City of Galt
Community Development Department

East Galt Infill Annexation/Simmerhorn Ranch Project

Initial Study/Mitigated Negative Declaration

May 2020

Prepared by

RANEY PLANNING & MANAGEMENT, INC. 20 years
1501 Sports Drive, Suite A, Sacramento, CA 95834

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APPENDICES:

INITIAL STUDY

May 2020

A. BACKGROUND

1. Project Title: East Galt Infill Annexation/Simmerhorn Ranch Project

2. Lead Agency Name and Address:
City of Galt
Community Development Department
495 Industrial Drive
Galt, CA 95632

3. Contact Person and Phone Number:
Chris Erias
Community Development Director
(209) 366-7230

4. Project Location: Generally bounded by Amador Avenue to the north, Marengo Road to the east, Boessow Road to the south, and SR 99 to the West

5. Project Sponsor's Name and Address:
Elliott Homes, Inc.
Price Walker
340 Palladio Parkway #521
Folsom, CA 95630
(916) 984-1300

6. Existing County of Sacramento General Plan Designation:
Agricultural - Urban Reserve (UR)

7. Existing Sacramento County Zoning Designation:
Urban Reserve (UR)
Agricultural Residential – 1 Acres (AR-1)
Agricultural Residential – 2 Acres (AR-2)
Agricultural Residential – 5 Acres (AR-5)
Agricultural Residential – 10 Acres (AR-10)
Auto Commercial (AC)

8. Existing City of Galt General Plan Designation:
Low Density Residential (LDR)
Medium Density Residential (MDR)
Medium High Density Residential (MHDR)
Mixed-Use (MU)
Commercial (C)
Light Industrial (LM)
Public/Quasi Public (PQ)
Park (P)
Open Space (OS)

9. Proposed City of Galt City Zoning:
Intermediate-Density Single-Family (R1B)
Maximum-Density Single-Family (R1C)

Medium-Density (R2)
Medium-Density Planned Development (R3-PD)
Light Industrial (LM)
Mixed Use (MU)
Commercial (C)
Pubic/Quasi Public (PQ)
Open Space (OS)

10. Required Approvals from Other Public Agencies: California Department of Fish and Wildlife
Central Valley Regional Water Quality Control Board
Sacramento Local Agency Formation Commission
South Sacramento Conservation Agency
United States Army Corps of Engineers

11. Surrounding Land Uses and Setting:

The project consists of the 338-acre East Galt Infill Annexation Area located within Sacramento County, California, within the City of Galt's Sphere of Influence. The East Galt Infill Annexation Area is generally bounded by Amador Avenue to the north, Marengo Road to the east, Boessow Road to the south, and SR 99 to the west. Existing residential developments are located to the north of the project site, and a planned residential development is located south of the project site. Downtown Galt exists to the west of the project site, across State Route (SR) 99. The existing land uses on the East Galt Infill Annexation Area are predominantly agricultural with single-family residences. The Sacramento County General Plan designates the East Galt Infill Annexation Area as Agricultural – Urban Reserve (UR). The Galt General Plan designates portions of the East Galt Infill Annexation Area as Light Industrial, Low Density Residential, Medium Density Residential, Medium-High Density Residential, Commercial, Public/Quasi-Public, and Mixed-Use. The Sacramento County Zoning designation for the site is UR.

A 119.5-acre portion of the East Galt Infill Annexation Area, hereinafter referred to as Simmerhorn Ranch, is proposed for development as part of the proposed project. The Simmerhorn Ranch Project Site is bounded by Simmerhorn Road to the north, Marengo Road to the east, and Boessow Road to the south. A proposed extension of Carillion Boulevard and Crystal Way from Simmerhorn Road would define the western boundary of the Simmerhorn Ranch Project Site. Surrounding land uses include single-family residential development to the north and west, agricultural fields to the east, and Dry Creek, which demarcates the San Joaquin County Line, to the south beyond Boessow Road.

12. Project Description Summary:

The proposed project would include annexation of the 338-acre East Galt Infill Annexation Area and development of the approximately 119.5-acre Simmerhorn Ranch Project Site with a residential subdivision consisting of 429 single-family lots with a mix of lot sizes and densities, as well as a proposed Park and Elementary School site. With the exception of the proposed development within the Simmerhorn Ranch Project Site, the proposed project would not involve any development within the East Galt Infill Annexation Area, and all existing land uses would remain unchanged. The proposed project would require the following discretionary approvals from the City of Galt: Annexation; Approval of a Small

Lot and a Large Lot Vesting Tentative Map; Pre-Zoning; and General Plan Amendment to on-site land use designations and the Circulation Element.

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

    In compliance with Assembly Bill (AB) 52 (Public Resources Code Section 21080.3.1), a project notification letter was distributed to the chairpersons of the Wilton Rancheria and the Torres Martinez Desert Cahuilla Indians on April 2, 2019. One letter was received from the Wilton Rancheria within the 30-day response period.

B. SOURCES

The following documents are referenced information sources utilized for this analysis:

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

California Air Resources Board. *The 2017 Climate Change Scoping Plan Update.* January 20, 2017.

California Department of Conservation. *DOC Maps: Agriculture*. Available at: https://maps.conservation.ca.gov/agriculture/#dataviewer. Accessed October 2019.

California Department of Conservation. *Fault Activity Map of California*. Available at: http://maps.conservation.ca.gov/cgs/fam/. Accessed November 4, 2019.

California Department of Finance. *E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2019, with 2010 Benchmark.* Available at: http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/. Accessed December 2019.

California Department of Forestry and Fire Protection. *Sacramento County, Very High Fire Hazard Severity Zones in LRA*. July 20, 2008.

California Department of Resources Recycling and Recovery (CalRecycle). *Facility/Site Summary Details: Sacramento County Landfill (Kiefer) (34-AA-0001)*. Available at: https://www2.calrecycle.ca.gov/swfacilities/Directory/34-AA-0001/. Accessed October 2019.

California Geologic Survey. *Data Viewer.* Available at: https://maps.conservation.ca.gov/geologichazards/#dataviewer. Accessed February 2020.

City of Galt. *2015 Urban Water Management Plan Update*. June 2016.

City of Galt. *2030 Galt General Plan, Policy Document, Final*. April 2009.

City of Galt. *City of Galt 2030 General Plan EIR*. April 2009.

City of Galt. *Community Profile: City of Galt Demographic Overview.* Available at: http://www.ci.galt.ca.us/city-departments/economic-development/community-profile. Accessed December 2019.

City of Galt. *Galt General Plan Update 2030: Environmental Impact Report.* [pg. 10-17] July 2008.

City of Galt. *Sanitary Sewer Management Plan*. July 2009.

City of Galt. *Wastewater Treatment Plant.* Available at: http://www.ci.galt.ca.us/city-departments/public-works/utilities-division/wastewater-services/wastewater-treatment-plant. Accessed April 2020.

Department of Toxic Substances Control. Hazardous Waste and Substances Site List. Available at: https://www.envirostor.dtsc.ca.gov/public/search.asp?cmd=search&reporttype=CORTESE&site_type=CSITES. Accessed November 2019.

ECORP Consulting, Inc. *Biological Resources Assessment, Simmerhorn Ranch Project, Sacramento County, California.* May 2019.

ECORP Consulting, Inc. *Biological Resources Assessment: East Galt Infill Annexation Area.* June 19, 2019

ECORP Consulting, Inc. *Bird and Bat Pre-Demolition Clearance Survey – Simmerhorn Ranch Development Project, Sacramento County, California*. January 14, 2020.

ECORP Consulting, Inc. *Cultural Resources Inventory and Evaluation Report.* April 18, 2019.

ECORP Consulting, Inc. *RE: Cultural Resources Records Search Literature Review for the Galt East Infill Annexation Area, Sacramento County, California – T 5 North, R 6 East, Sections 23 and 26 (ECORP) Project No 2018-180.* May 24, 2019.

ECORP Consulting, Inc. *Special-Status Plant survey Report, Simmerhorn Ranch Project, Sacramento County, California.* December 2019.

Federal Emergency Management Agency. *Flood Insurance Rate Map 060670468J.* Effective October 20, 2016.

GHD, Inc. *Simmerhorn Ranch Traffic Impact Study*. November 6, 2019.

Sacramento County. *Sacramento County Open Data: Williamson Act Parcels*. Available at: http://data-sacramentocounty.opendata.arcgis.com/datasets/199810930ef9465a9a1ae0315e5a7535_0?geometry=-121.343%2C38.247%2C-121.216%2C38.271. Accessed November 2019.

Sacramento Metropolitan Air Quality Management District. *Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District*. January 31, 2020.

Saxelby Acoustics. *Simmerhorn Ranch. January 9, 2020*.

Sierra Nevada Arborist. *Arborist Report and Tree Inventory Summary*. November 5, 2019.

Wood Rodgers, Inc. *Simmerhorn Ranch (119.5 acres) Preliminary Storm Drainage Analysis*. March 22, 2019.

Wood Rodgers, Inc. *Subject: Simmerhorn Ranch (119.5 acres) Preliminary Sewer, Water and Storm Drainage Plans*. March 22, 2019.

C. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

D. DETERMINATION

On the basis of this initial study:

☐ I find that the Proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the Proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the applicant. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the Proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature	Date
Chris Erias	City of Galt
Printed Name	For

E. BACKGROUND AND INTRODUCTION

This IS/MND identifies and analyzes the potential environmental impacts of the East Galt Infill Annexation/Simmerhorn Ranch Project (proposed project). The information and analysis presented in this document is organized in accordance with the California Environmental Quality Act (CEQA) checklist in Appendix G of the CEQA Guidelines. Where the analysis provided in this document identifies potentially significant environmental effects of the project, mitigation measures are prescribed. The mitigation measures prescribed for environmental effects described in this IS/MND will be implemented in conjunction with the project, as required by CEQA. The mitigation measures will be incorporated into the project through project conditions of approval. The City will adopt findings and a Mitigation Monitoring/Reporting Program for the project in conjunction with approval of the project.

In 2009, the City of Galt completed a comprehensive General Plan Update (GPU). An EIR was prepared for the GPU. The GPU EIR is a program EIR, prepared pursuant to Section 15168 of the CEQA Guidelines (Title 14, California Code of Regulations, Sections 15000 et seq.). The Galt GPU EIR analyzed full implementation of the Galt GPU and identified measures to mitigate the significant adverse impacts associated with the General Plan.

Several technical reports were prepared for the proposed project, including separate Biological Resources Assessments for the East Galt Infill Annexation Area as well as the Simmerhorn Ranch Project Site, and an Aquatic Resources Delineation for the Simmerhorn Ranch Project Site, all of which were prepared by ECORP Consulting, Inc (ECORP). In addition to the foregoing reports, ECORP prepared a cultural resources memorandum and a Cultural Resources Inventory and Evaluation Report for the East Galt Infill Annexation Area and the Simmerhorn Ranch Project Site, respectively. A Transportation Impact Analysis was prepared by GHD for the East Galt Infill Annexation Area, including the Simmerhorn Ranch Project Site. Saxelby Acoustics prepared a Noise and Vibration Study that included both the East Galt Infill Annexation Area as well as the Simmerhorn Ranch project. All of the technical reports used for the project analysis are available as appendices to this IS/MND

F. BASELINE FOR ANALYSIS

According to CEQA Guidelines Section 15125, Environmental Setting, the environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The purpose of this requirement is to give the public and decision makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts. According to Section 15125(a)(1):

> Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective.

In the case of the proposed project, at the initiation of the environmental review process, the Simmerhorn Ranch Project Site contained a complex of structures associated with previous use of the Simmerhorn Ranch Project Site for dairy production. During preparation of this environmental analysis the project applicants applied for a demolition permits with the County of Sacramento. Because the entire project site, including the Simmerhorn Ranch Project Site and the dairy production facilities, is currently within an unincorporated portion of Sacramento County, Sacramento County retains the authority to grant demolition permits outside of the City of Galt's environmental review process for the proposed project. Consequently, the demolition permit was approved by the County of Sacramento without the City of Galt taking any discretionary actions.

Due to the timing of the demolition of the dairy complex structures, the majority of the analyses within this IS/MND include consideration of potential impacts resulting from demolition of the existing dairy structures as part of the proposed project. However, because such demolition activity has occurred separately from implementation of the project, demolition is not considered a result of the proposed project, and impacts resulting solely from demolition of the dairy structures are not considered significant in this analysis.

G. PROJECT DESCRIPTION

A detailed description of the proposed project, including the project setting, surrounding land uses, project components, and required City of Galt approvals is provided below.

Project Location and Setting

The proposed project consists of the 338-acre East Galt Infill Annexation Area located within Sacramento County, California, within the City of Galt's Sphere of Influence. The site is approximately 25 miles south of the City of Sacramento and 26 miles north of the City of Stockton. SR 99 runs north and south through the City of Galt and provides primary regional access to the City. The project site is generally bounded by Amador Avenue to the north, Marengo Road to the east, Boessow Road to the south, and SR 99 to the west (see Figure 1 and Figure 2). Existing residential developments are located to the north of the project site, and a planned residential development is located south of the project site. Downtown Galt exists to the west of the project site, across State Route (SR) 99. The existing land uses on the project site are predominantly agricultural with dispersed single-family residences. The Galt General Plan designates portions of the project site as LDR, MDR, MHDR, MU, C, LM, PQ, P, and OS. The Sacramento County has designated and zoned the site UR.

A 119.6-acre portion of the East Galt Infill Annexation Area, hereinafter referred to as the Simmerhorn Ranch Project Site, is proposed for development as part of the proposed project. The Simmerhorn Ranch Project Site is bounded by Simmerhorn Road to the North, Marengo Road to the East, and Boessow Road to the south. The proposed extensions of Carillion Boulevard and Crystal way from Simmerhorn Road would define the western boundary of the project site. Surrounding land uses include single-family residential development to the north and west, agricultural fields to the east, and Dry Creek, which demarcates the San Joaquin County Line, to the south beyond Boessow Road.

Project Components

The proposed project would include annexation of the 338-acre East Galt Infill Annexation Area into the City of Galt. Within the overall 338-acre East Galt Infill Annexation Area, only the 119.6-acre Simmerhorn Ranch Project Site is proposed for development. Development activity in the remaining 218.4 acres of the East Galt Infill Annexation Area is not currently proposed, and all existing uses would remain unchanged with implementation of the proposed project. Thus, for the purposes of this analysis, the portions of the 338-acre East Galt Infill Annexation Area that are not proposed for development are referred to collectively as the Non-Participating Properties.

The East Galt Infill Annexation and the Simmerhorn Ranch project are discussed separately in further depth below.

Figure 1
Regional Project Location

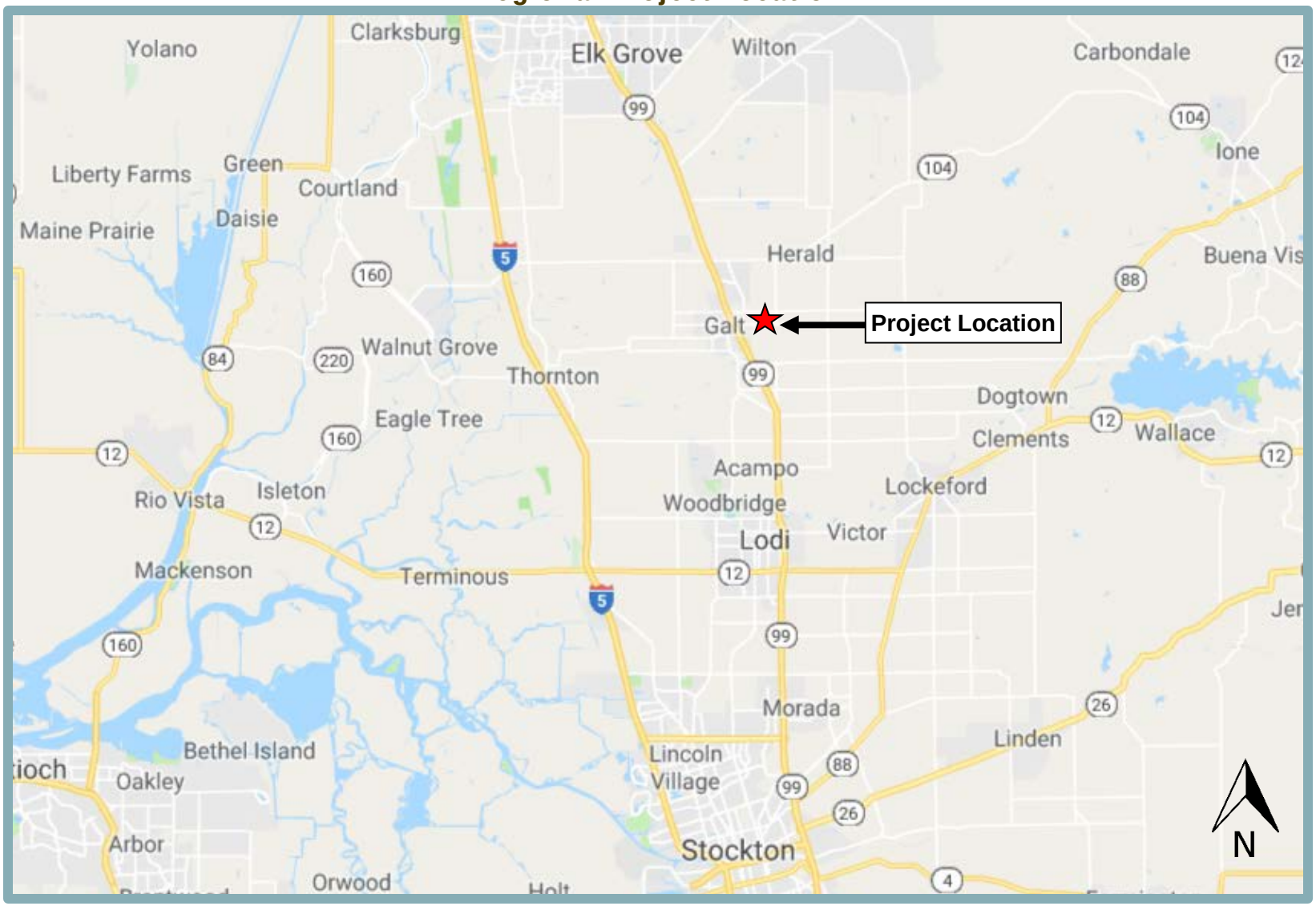
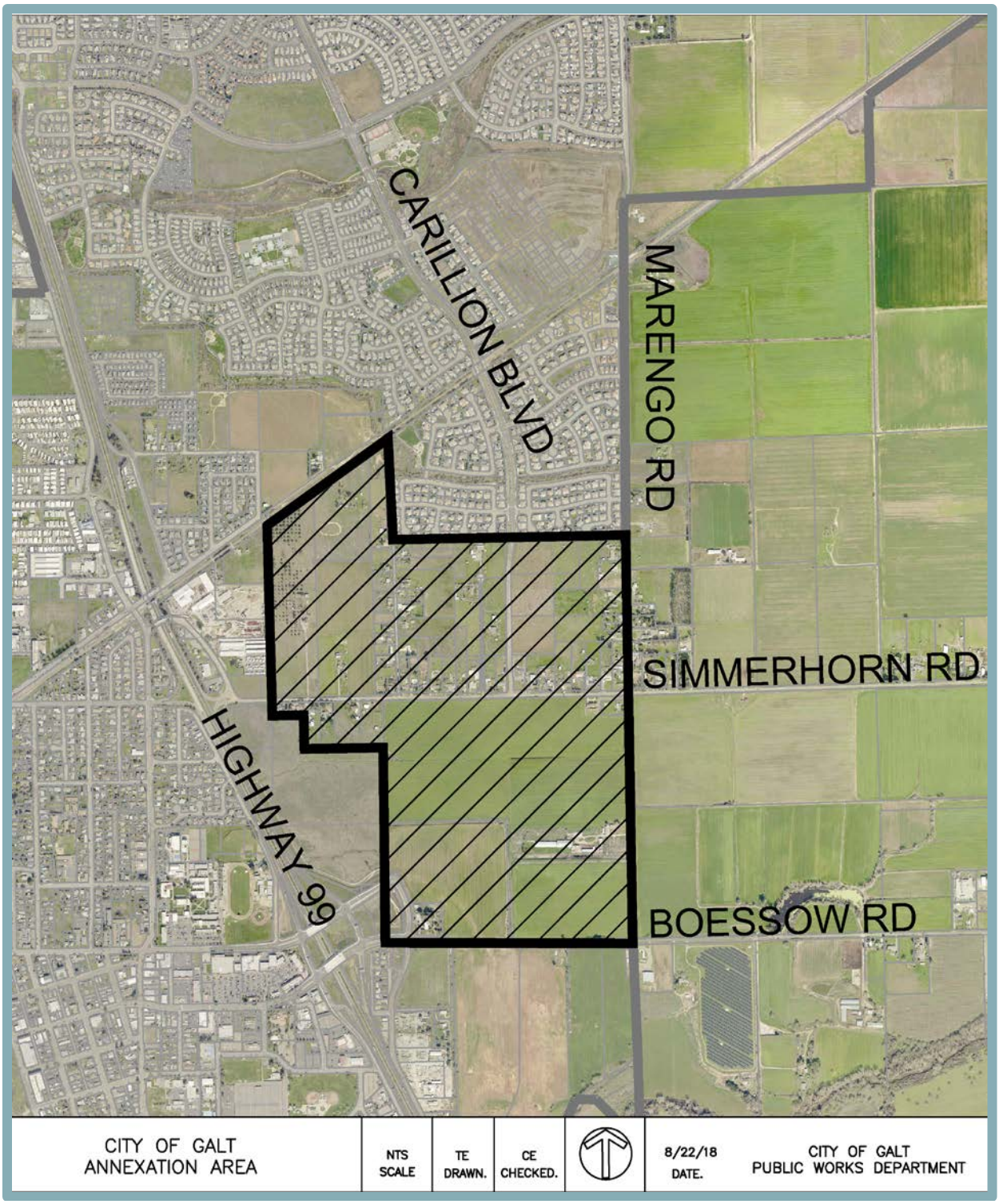


Figure 2
East Galt Infill Area



Annexation

As stated above, the proposed project would include annexation of the entire 338-acre East Galt Infill Annexation Area into the City of Galt. Annexation of the East Galt Infill Annexation Area to the City of Galt, including the Simmerhorn Ranch Project Site and all Non-Participating Properties within the East Galt Infill area, is a formal municipal reorganization action that requires approval by the Sacramento Local Agency Formation Commission (LAFCo). For this annexation to occur, first, the City would approve an annexation resolution for the project, which would subsequently be submitted to the Sacramento LAFCo for approval as a responsible agency. A Property Tax Exchange Agreement must be executed between the County (including any affected special districts) and the City prior to consideration of the Reorganization request by LAFCo.

The annexation would formally transfer all local governmental powers and municipal services pertaining to the East Galt Infill Annexation Area from the County of Sacramento to the City of Galt. Annexation would require detachment of the project site from the Galt Irrigation District and the Sloughhouse Resource Conservation District. Upon annexation, the City would be responsible for providing water service, sewer service, police protection, library and general government services, along with maintaining water and sewer mains, the on-site storm drainage system, and local parks and recreation resources. Although City water and sewer services would be made available to Non-Participating Properties within the East Galt Infill Annexation Area, existing on-site water or wastewater systems could be maintained at the discretion of the land owner. However, should non-participating property owners within the East Galt Infill Annexation Area wish to further develop their properties in excess of what is currently allowed under the County of Sacramento land use regulations, such development would be required to meet the City of Galt's development standards. Such standards include the requirement that new development be connected to City water and sewer services. The detachment of the project site from the Galt Irrigation District and the Sloughhouse Resource Conservation District would require approval from the Sacramento Local Agency Formation Commission (Sacramento LAFCo).

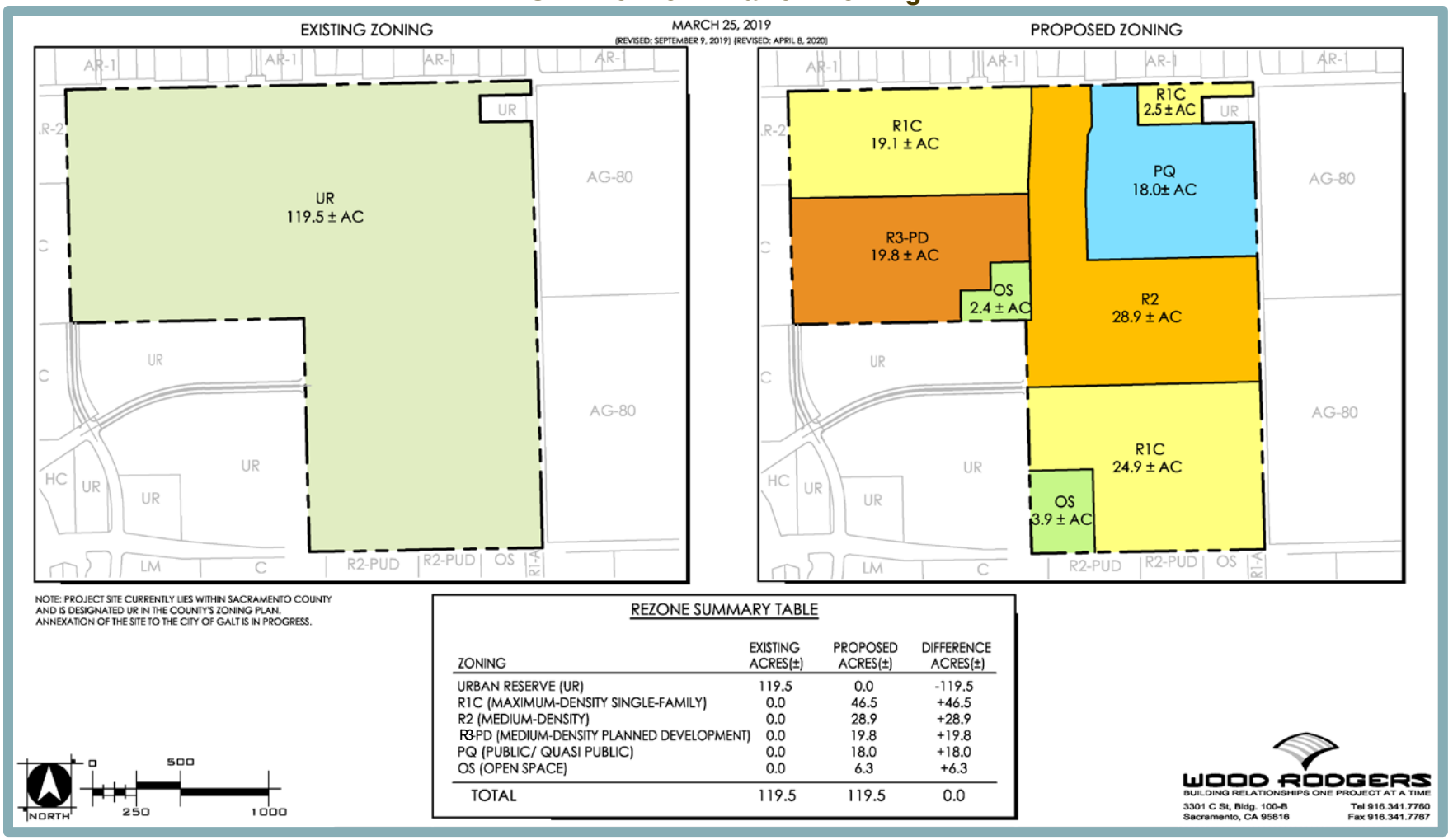
Pre-Zoning

As part of the annexation action, pre-zoning would be required for the entire 338-acre East Galt Infill Annexation Area. The Non-Participating Properties as well as the Simmerhorn Ranch Project Site are currently under the jurisdiction of Sacramento County. Sacramento County's existing zoning designation for the East Galt Infill Annexation Area is UR. The proposed pre-zoning for the Non-Participating Properties in the East Galt Infill Annexation Area includes R1B, LM, MU, C, and PQ, while the proposed pre-zoning designations for the Simmerhorn Ranch Project Site include R1C, R2, R3-PD, PQ, and OS, as shown in Figure 3. The project includes pre-zoning of the Simmerhorn Ranch Project Site and the Non-Participating Properties. The pre-zoning for the Non-Participating Properties would be consistent with the General Plan land use designations included in the City of Galt's adopted General Plan Update. Pre-zoning for the Simmerhorn Ranch Project Site would be consistent with the proposed General Plan land use designations discussed in further depth below.

Amendments to the Circulation Element of the General Plan

The proposed project includes requests for amendments to the Circulation Element of the City's General Plan, with relation to the future number of lanes included in the portions of A Street, Carillion Boulevard, Marengo Road, and Simmerhorn Road within the East Galt Infill Annexation Area.

Figure 3
Simmerhorn Ranch Zoning



REZONE SUMMARY TABLE

ZONING	EXISTING ACRES(±)	PROPOSED ACRES(±)	DIFFERENCE ACRES(±)
URBAN RESERVE (UR)	119.5	0.0	-119.5
R1C (MAXIMUM-DENSITY SINGLE-FAMILY)	0.0	46.5	+46.5
R2 (MEDIUM-DENSITY)	0.0	28.9	+28.9
R3-PD (MEDIUM-DENSITY PLANNED DEVELOPMENT)	0.0	19.8	+19.8
PQ (PUBLIC/ QUASI PUBLIC)	0.0	18.0	+18.0
OS (OPEN SPACE)	0.0	6.3	+6.3
TOTAL	119.5	119.5	0.0

Within the East Galt Infill Annexation Area, A Street and Carillion Boulevard were planned to be extended as four-lane arterial streets. In addition, Simmerhorn Road and Marengo Road were anticipated to be improved to accommodate four-lanes of vehicle traffic. As part of the proposed project, the Circulation Element of the City's General Plan would be amended to allow for the development of the extensions to A Street and Carillion Boulevard, as well as the improvements to Simmerhorn Road and Marengo Road to include only two-lanes, rather than the previously anticipated four-lanes. Despite the reduction in the number of lanes, all four roadways would be classified as arterials. In addition to the reduction in the number of lanes included in A Street, the City's General Plan anticipated the development of an extension of A Street through the project site, to a future connection with Marengo Road through a curving pattern. The Simmerhorn Ranch project, discussed in further depth below, includes a request to amend the Circulation Element of the General Plan to reflect a proposed realignment of the extension of A Street to create a more direct, perpendicular connection between A Street and Marengo Road. The proposed amendments are summarized below:

- A Street – Reduced from four-lanes to two-lanes from SR 99 to Marengo Road, and realigned to remove the proposed curved connection to Marengo Road;
- Carillion Boulevard – Reduced from four-lanes to two-lanes from Simmerhorn Road to Boessow Road;
- Marengo Road – Reduced from four-lanes to two-lanes from Simmerhorn Road to Boessow Road; and
- Simmerhorn Road – Reduced from four-lanes to two-lanes from Carillion Boulevard to SR 99.

It should be noted that the alignment and design of Carillion Boulevard Road would comply with the recommendations of the recently completed Carillion Boulevard Complete Street Corridor Study.

Simmerhorn Ranch

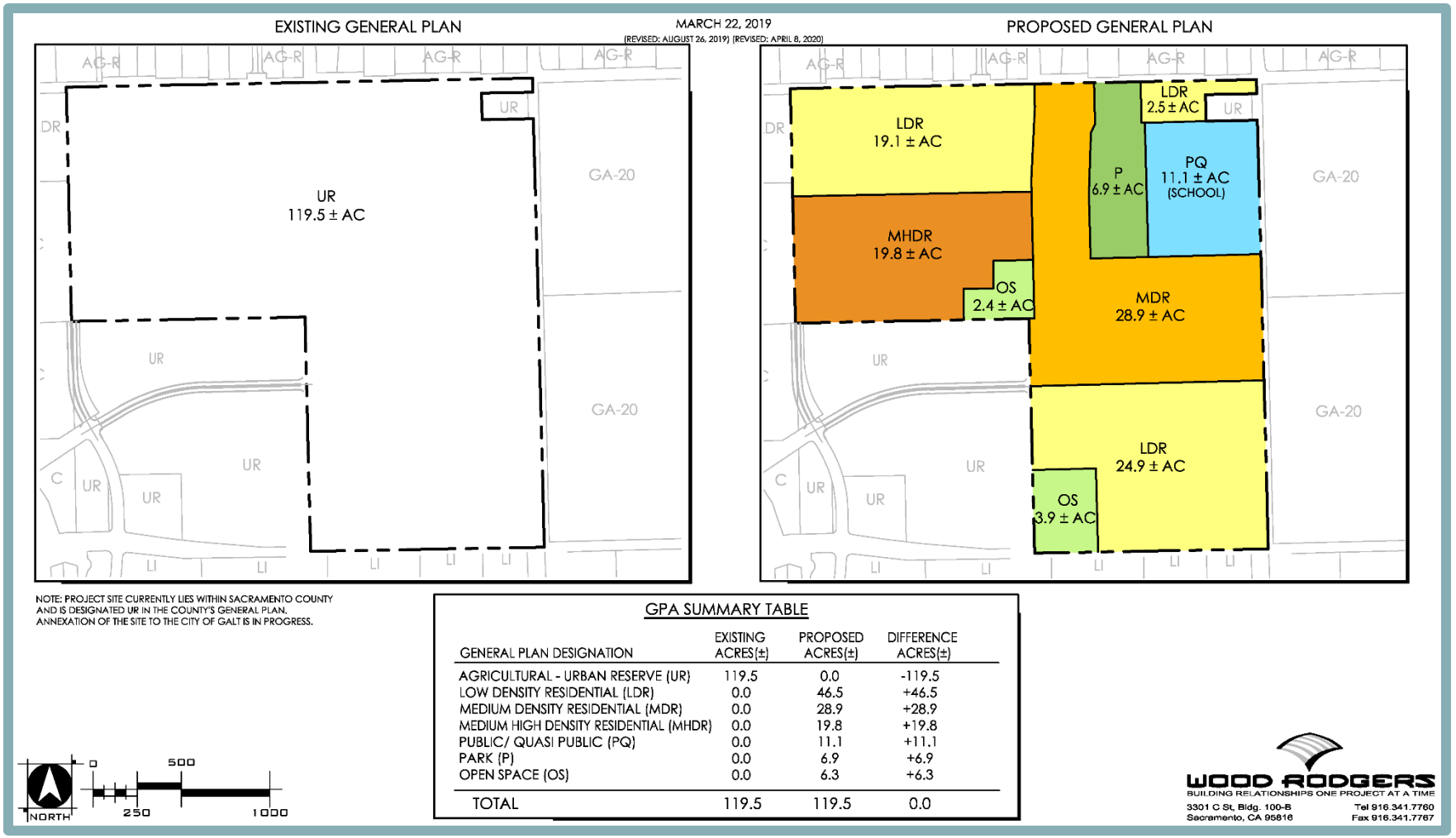
The Simmerhorn Ranch Project Site is depicted in Figure 2, and is the only area of the East Galt Infill Annexation Area that is currently proposed for development. The Simmerhorn Ranch project would include development of the 119.6-acre site with a total of 429 residential units, a park, and dedication of a school site for future development of an elementary school. Further information about the Simmerhorn Ranch project is provided below.

General Plan Amendment

A General Plan Amendment would be required for the Simmerhorn Ranch Project Site. Land within the Simmerhorn Ranch Project Site is currently designated in the City's General Plan for a mix of residential uses, including Low, Medium, and Medium High Density Residential, as well as Park and Public/Quasi Public space (see Figure 3).

As shown in Figure 4, the proposed General Plan Amendment would redistribute the land use designations within the 119.6-acre site, but would not introduce any new land use designations not previously anticipated for the project site. As a result of the reorganization of land uses, the amount of low density residential uses would be slightly increased while the amount of medium density residential uses would be slightly reduced within the Simmerhorn Ranch Project Site. Reorganization of the land uses within the Simmerhorn Ranch Project Site would require an amendment to the General Plan Land Use Map.

Figure 4
Simmerhorn Ranch General Plan Amendment



GPA SUMMARY TABLE

GENERAL PLAN DESIGNATION	EXISTING ACRES(±)	PROPOSED ACRES(±)	DIFFERENCE ACRES(±)
AGRICULTURAL - URBAN RESERVE (UR)	119.5	0.0	-119.5
LOW DENSITY RESIDENTIAL (LDR)	0.0	46.5	+46.5
MEDIUM DENSITY RESIDENTIAL (MDR)	0.0	28.9	+28.9
MEDIUM HIGH DENSITY RESIDENTIAL (MHDR)	0.0	19.8	+19.8
PUBLIC/ QUASI PUBLIC (PQ)	0.0	11.1	+11.1
PARK (P)	0.0	6.9	+6.9
OPEN SPACE (OS)	0.0	6.3	+6.3
TOTAL	119.5	119.5	0.0

WOOD RODGERS
BUILDING RELATIONSHIPS ONE PROJECT AT A TIME
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Sacramento, CA 95816
Tel 916.341.7760
Fax 916.341.7767

As discussed above, various amendments related to the number of lanes included in roadways and the alignments of certain roadways have been included in the Simmerhorn Ranch Project and the larger East Galt Infill Annexation. In particular, the number of lanes within future sections of Simmerhorn Road, Carillion Boulevard, A Street, and Marengo Road within the Simmerhorn Ranch Project Site would be reduced from four-lanes anticipated in the General Plan, to two lanes. Furthermore, the alignment of A Street would be amended to create a perpendicular connection with Marengo Road.

Tentative Subdivision Map

A Tentative Subdivision Map will be required for the 119.6-acre Simmerhorn Ranch Project Site proposed for development. Two subdivision maps are being prepared to facilitate financing, sale, and development of the 119.6-acre project site. The Large Lot Map would create large lots consisting of one or more development phases that could be used to secure financing for site development and infrastructure improvements or sold to merchant builders (see Figure 5).

The Large Lot Tentative Subdivision Map includes a total of ten large lots divided into the following uses:

- Unit 1A: 22.2 acres of LDR;
- Unit 1B: 17.4 acres of LDR;
- Unit 2A: 19.9 acres of MDR;
- Unit 2B: 6.4 acres of MDR;
- Unit 3: 19.1 acres of MHDR;
- Lot A: 2.5 acres of LDR;
- Lot B: 10.1 acres for proposed elementary school;
- Lot C: 6.6 acres of Park;
- Lot D: 2.1 acres of open space/water quality basin; and
- Lot E: 3.0 acres of open space/water quality basin.

The Small Lot Tentative Subdivision Map would create individual residential lots for sale and home construction, define rights-of-way for the streets, utilities and energy infrastructure, and identify common open space areas (see Figure 6). The infrastructure required to serve the development, including stormwater, wastewater, water, electric, gas, and telephone services, would be reflected on the small-lot tentative map.

Infrastructure Improvements

The proposed Simmerhorn Ranch development would include construction of infrastructure necessary to connect the Simmerhorn Ranch Project Site to existing municipal water, wastewater, and stormwater connections within Simmerhorn Road and Boessow road. Pacific Gas & Electric (PG&E) would provide natural gas to the site, Sacramento Municipal Utilities District (SMUD) would provide electricity, and American Telephone and Telegraph (AT&T) would provide telephone service. The project would include the construction of electric, gas, and telephone services with various points of connection. In addition, circulation improvements would be developed throughout the project site.

Figure 5
Large Lot Vesting Tentative Map

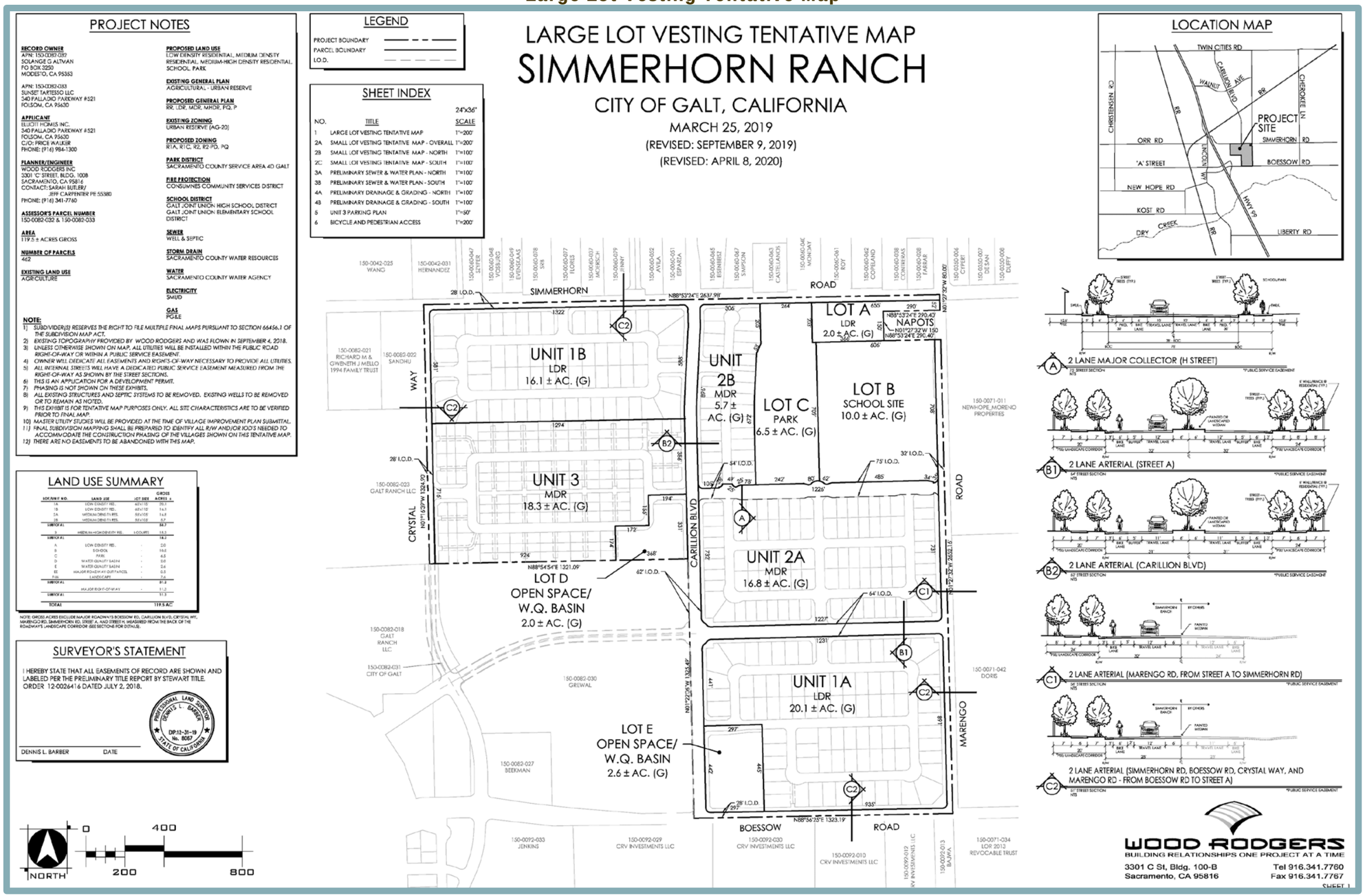
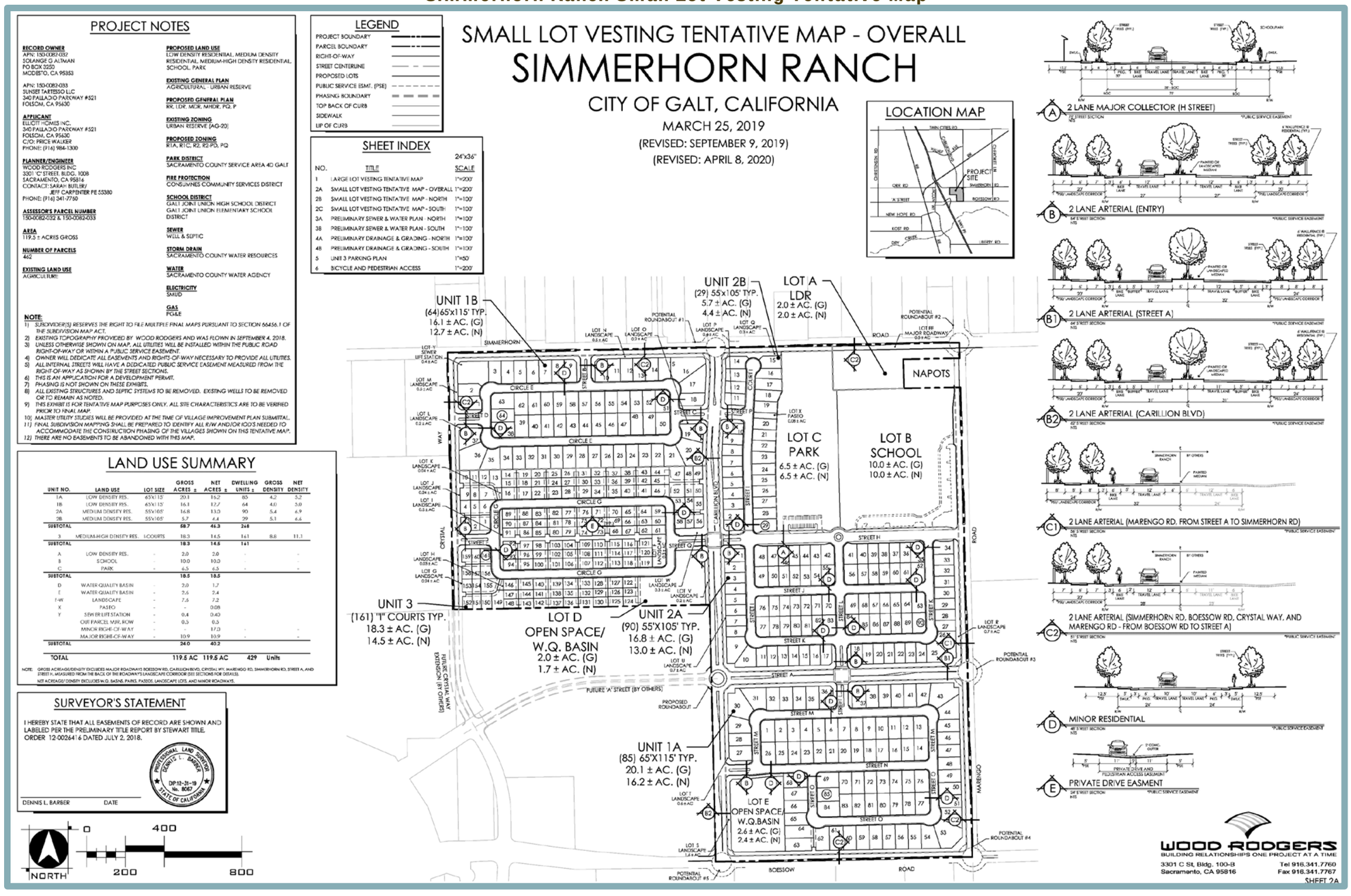


Figure 6
Simmerhorn Ranch Small Lot Vesting Tentative Map



Electricity

Existing 69 kilovolt (kV) facilities are located on portions of the west side of Marengo Road. The transmission line would need to be extended south to serve the entire Simmerhorn Ranch Project Site; the 69 kV line would cross to the east side of Marengo Road at McCaffrey Middle School and would continue down to Elk Hills Drive, where the line would connect to an existing line that extends from the SMUD substation located northwest of the intersection of Marengo Road and the UPRR corridor within the River Oaks Unit 3 subdivision. With the exception of the Marengo Road 69 kV transmission lines, electric service would be extended by running lines underground within Public Utility Easements (PUEs) which run alongside the proposed roadways. The PUEs provide a location of joint utility trenches that would parallel roadways behind the back of curb, and have been sized to allow for various utility vaults, transformers, and other appurtenances to be located within landscaped areas.

Natural Gas

PG&E provides natural gas service to the City of Galt from a pipeline located on the north side of the City. Service to the project site is provided by an existing six-inch natural gas line that runs along Marengo Road. Gas service would be extended into the project site by utilizing the PUEs that parallel roadways.

Water System

An existing 12-inch water main is located within Simmerhorn Road and extends from SR 99 to the line's existing terminus at Carillion Boulevard.

The Simmerhorn Ranch project would include extension of water mains in compliance with the City's Water Distribution System Master Plan. In particular, the Water Distribution System requires the following improvements:

- Simmerhorn Road: extension of the existing 12-inch main from the current terminus at Carillion Boulevard to Marengo Road;
- Crystal Way: construction of a 12-inch water main south from Simmerhorn Road;
- Carillion Boulevard: construction of a 12-inch water main from Simmerhorn Road down to Street "N". From Street "N" an eight-inch water main would continue to a connection point in Boessow Road;
- Marengo Road: construction of a 12-inch water main from Simmerhorn Road down to Street "N". From Street "N" an eight-inch water main would continue to a connection point in Boessow Road; and
- Either the main in Crystal Way or Street "A" would be required to connect to the existing 10-inch main within A Street, or future water mains constructed along with the Dry Creek Oaks Project.

The proposed improvements are presented in Figure 7 and Figure 8. It should be noted that the proposed 12-inch water main along Crystal Way would be located in close proximity to, but outside of the Simmerhorn Ranch Project Site (see Figure 7). Although the 12-inch water main along Crystal Way would be outside of the Simmerhorn Ranch Project Site, the water main would be within the East Galt Infill Annexation Area, and potential impacts related to development of such infrastructure are analyzed throughout this IS/MND. Eight-inch water lines would be constructed within the proposed internal roadways and would provide water service to each of the proposed residences, the park, and the elementary school site.

Figure 7
Simmerhorn Ranch Proposed Water and Sewer Improvements – North

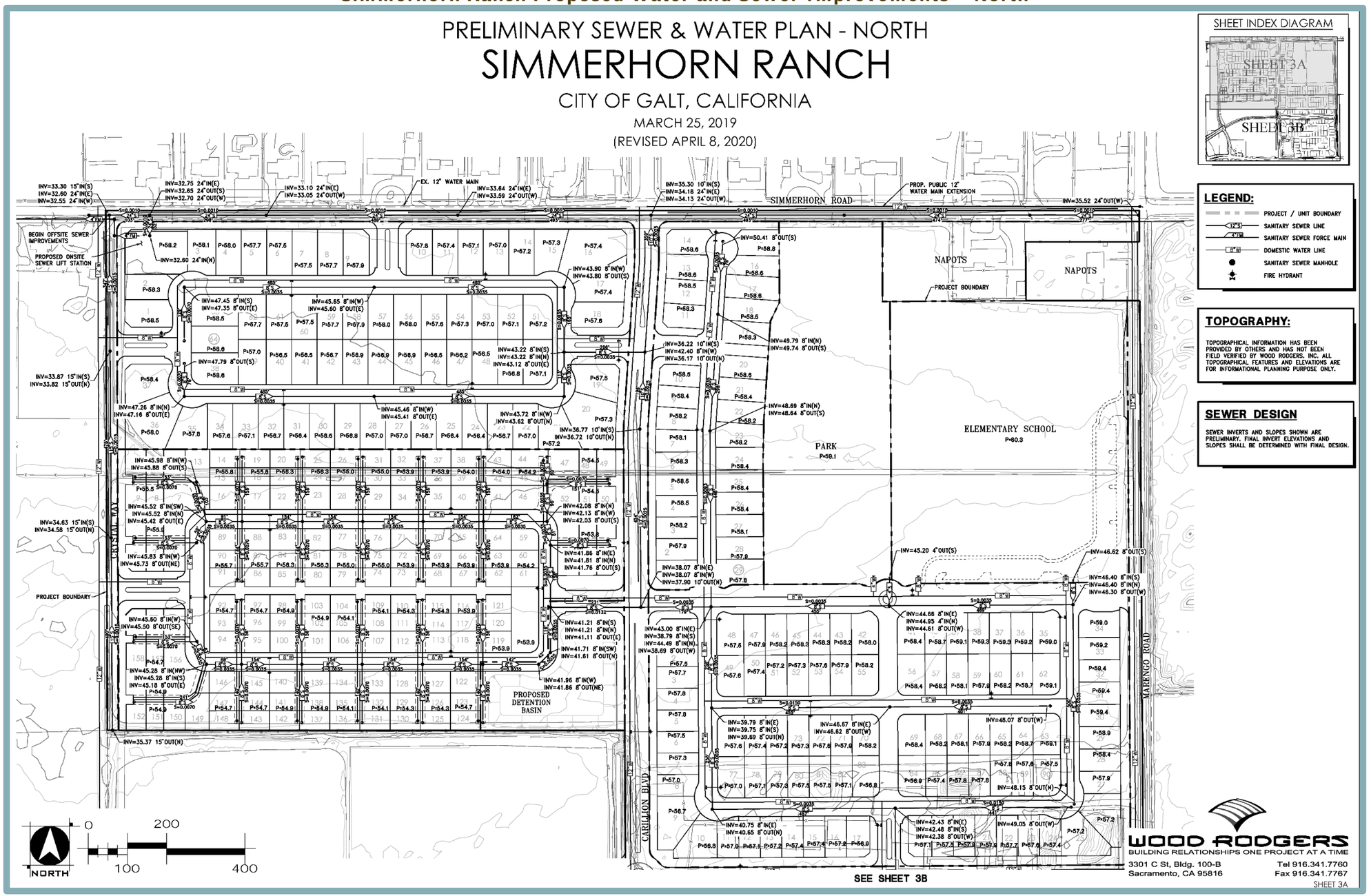
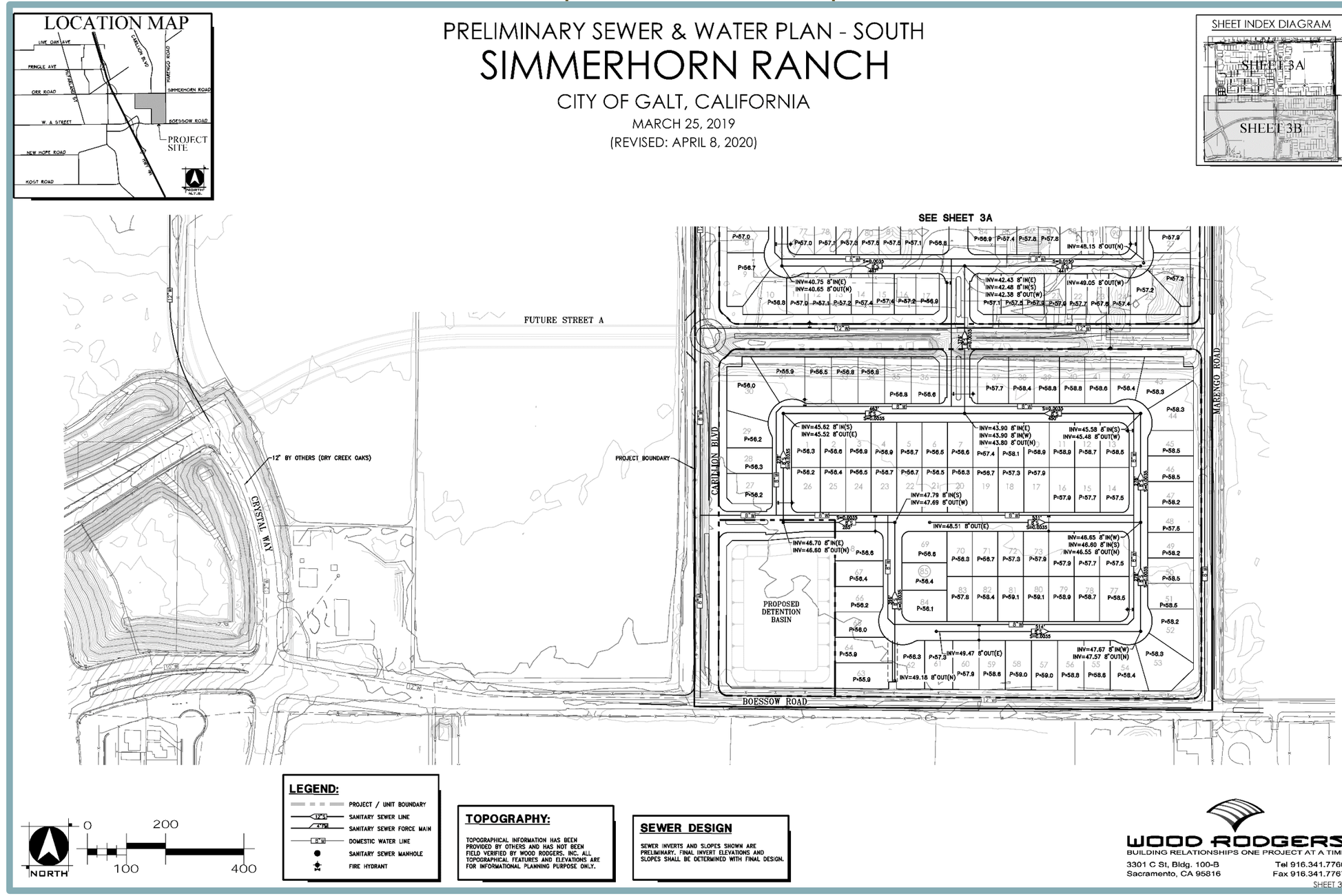


Figure 8
Simmerhorn Ranch Proposed Water and Sewer Improvements – South



Wastewater System

The nearest existing point of connection to the project site is a 10-inch sewer main located approximately 1,150 linear feet west of the Simmerhorn Ranch Project Site, within Simmerhorn Road.

As shown in Figure 7 and Figure 8, the proposed project would include construction of an on-site temporary sewer lift station that would convey collected wastewater from the proposed residences through a four-inch force main that would extend north along Carillion Boulevard to Simmerhorn Road and tie into the existing 10-inch off-site sewer main. Extension of the proposed four-inch force main to the existing 10-inch sewer main would require construction activity outside of the Simmerhorn Ranch Project Site, but within the East Galt Infill Annexation Area, and within the existing Simmerhorn Road right-of-way.

In addition to the above, a 15-inch gravity sewer main would be constructed within Crystal Way, south from Simmerhorn Road to the southwestern corner of the Simmerhorn Ranch Project Site. A 24-inch sewer main would be constructed within Simmerhorn Road to Marengo Road.

Storm Drainage

On-site stormwater drainage infrastructure would consist of a network of 18-, 24-, and 36-inch underground storm drains with flows directed to the underground storm drains by way of curb and gutter. The underground infrastructure would direct stormwater to one of the two proposed on-site detention basins located along Carillion Boulevard (see Figure 9 and Figure 10). As shown in Figure 9 and Figure 10, water treated in the on-site detention basins would be conveyed west by way of a proposed underground 42-inch storm drain within the northerly portion of the Boessow Road right-of-way to connect to an existing 72-inch culvert at Boessow Road, approximately 450 linear feet east of Crystal Way. Stormwater discharged to the culvert would be directed to Dry Creek.

Required City of Galt Approvals

The following entitlements are required for approval:

- Approval of this Initial Study/Mitigated Negative Declaration;
- Adoption of a Mitigation Monitoring and Reporting Plan (MMRP);
- Annexation;
- General Plan Amendment (land use designations and Circulation Element);
- Pre-Zoning;
- Approval of a Large Lot Vesting Tentative Map; and
- Approval of a Small Lot Vesting Tentative Map.

Required Approvals from Other Agencies

The Sacramento LAFCo would be required to approve the requested annexation into the City of Galt and detachment of the project site from the Galt irrigation District and the Sloughhouse Resource Conservation District.

Figure 9
Simmerhorn Ranch Proposed Grading and Drainage Improvements – North

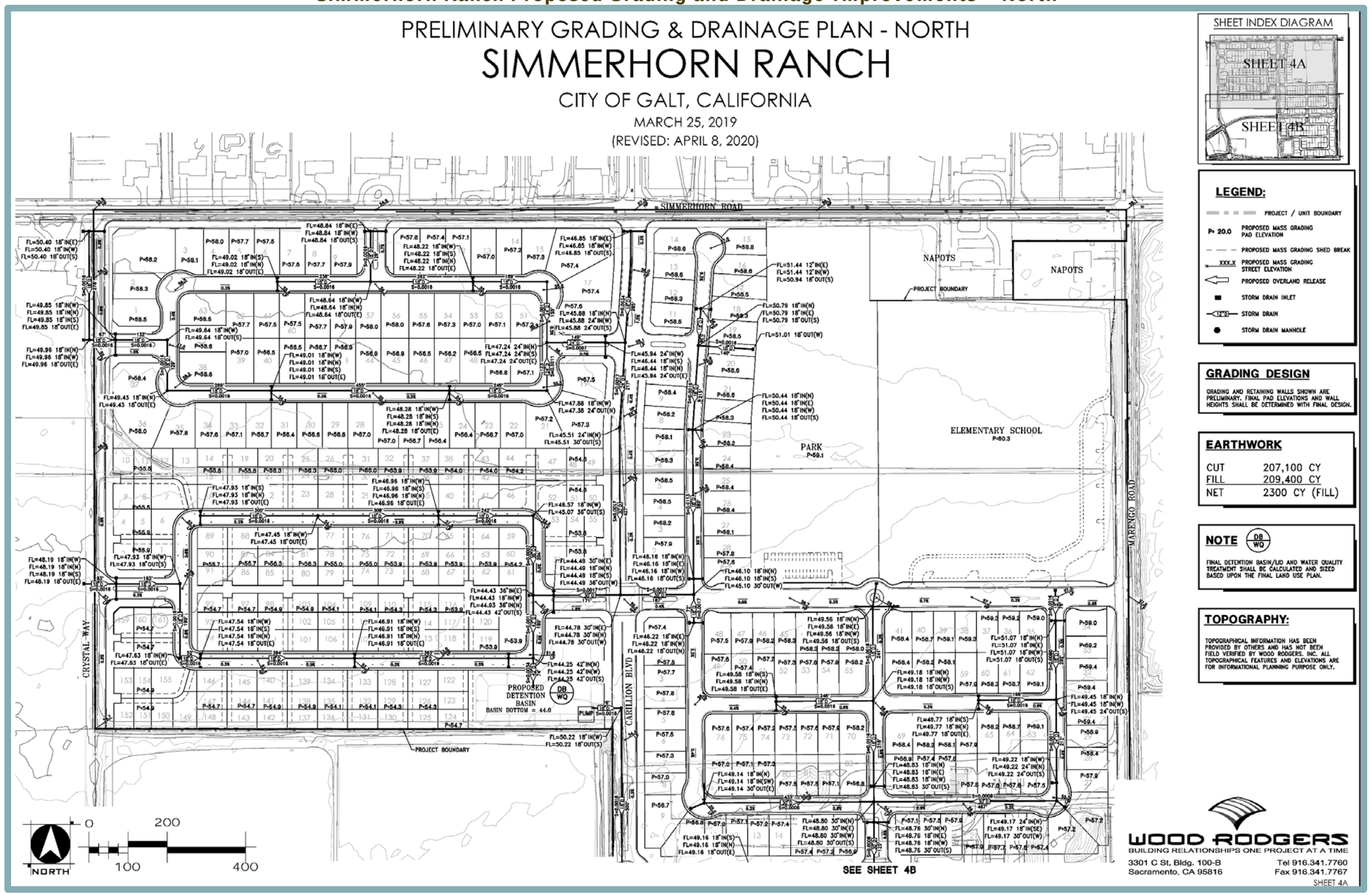
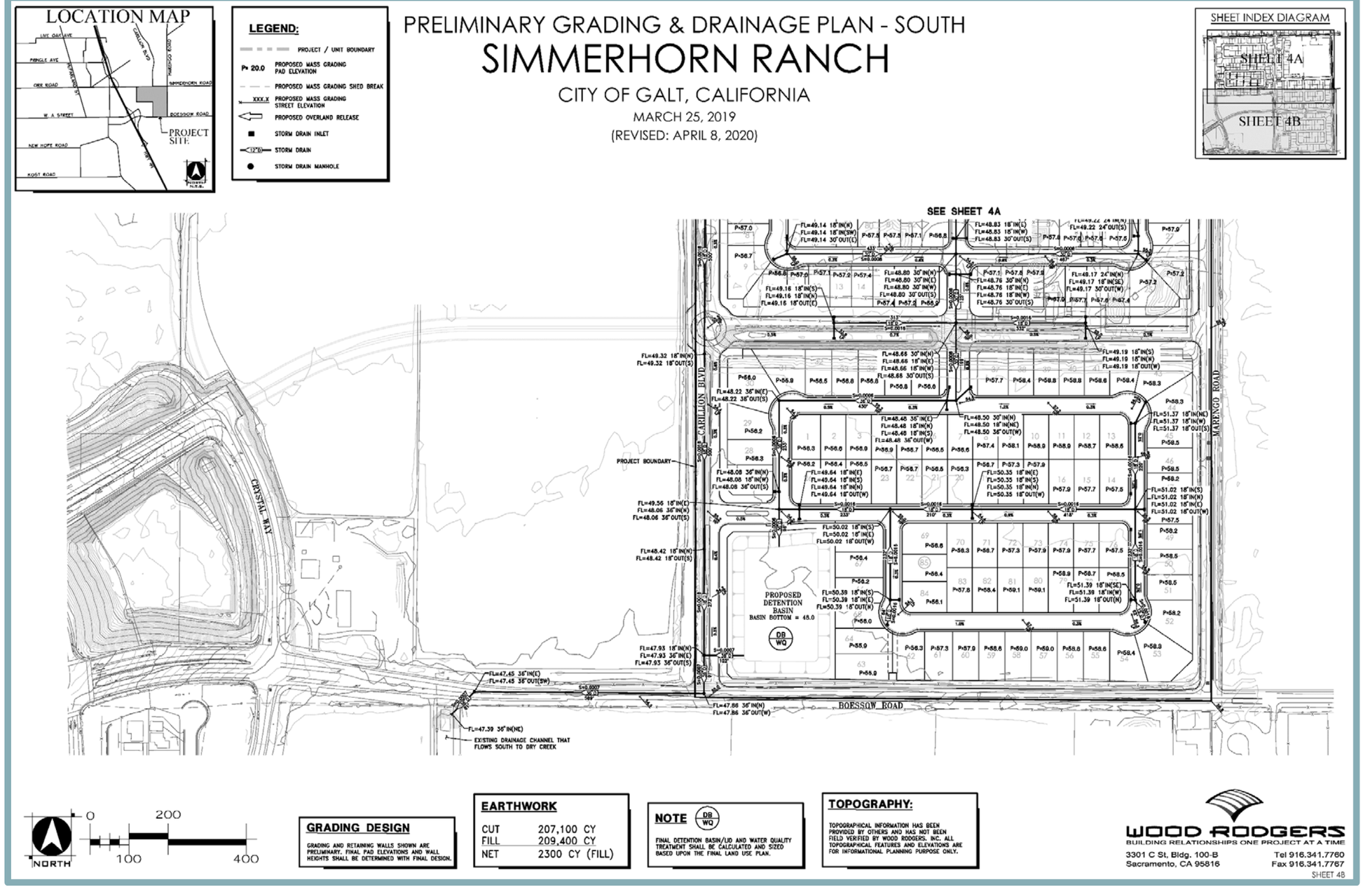


Figure 10
Simmerhorn Ranch Proposed Grading and Drainage Improvements – South



H. ENVIRONMENTAL CHECKLIST

The following checklist contains the environmental checklist form presented in Appendix G of the CEQA Guidelines. The checklist form is used to describe the impacts of the proposed project. A discussion follows each environmental issue identified in the checklist. For this checklist, the following designations are used:

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

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

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

No Impact: The project would not have any impact.

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

Discussion

a,b. **Non-Participating Properties/Simmerhorn Ranch Project**

Examples of typical scenic vistas include mountain ranges, ridgelines, or bodies of water as viewed from a highway, public space, or other area designated for the express purpose of viewing and sightseeing. In general, a project's impact to a scenic vista would occur if development of the project would substantially change or remove a scenic vista. The City's General Plan identifies a number of roadways within the Planning Area that are considered scenic routes. Scenic routes are designated as such because they pass through areas of high scenic value or provide access to important scenic, recreational, cultural, or historic points.

According to the City's General Plan, routes that provide views of the City's scenic qualities could include Christensen Road, Marengo Road, and Twin Cities Road. However, the aforementioned roadways are not designated as scenic roadways in any City or County planning documents. According to the California Scenic Highway Mapping System, the project site is not located within the vicinity of an officially designated State Scenic Highway. In addition, the General Plan does not designate any scenic vistas within the City's Planning Area. Therefore, the proposed project would not substantially affect a scenic vista or substantially damage scenic resources within a state scenic highway, and the project would have ***no impact.***

c. The scenic vistas have not been designated within the City's planning area; however, views of existing open space and agricultural areas are considered by the City to be important views. The East Galt Infill Annexation Area is at the eastern edge of the developed area of the City, and predominantly consists of rural residential and agricultural uses. According to the City's General Plan EIR, development along the periphery of the existing City boundary, particularly in the eastern portions of the City's study area that is currently used for open space/agricultural activities, would substantially degrade the visual character or quality of the area. The General Plan EIR determined that General Plan Policies and feasible mitigation measures were not sufficient to reduce the impact and concluded that a significant and unavoidable impact related to the degradation of the existing visual character or quality of the area would occur with buildout of the General Plan.

Sensitive public viewers in the surrounding area would primarily consist of motorists, pedestrians, and bicyclists travelling along local roadways, which include, but are not limited to Marengo Road, Simmerhorn Road, Carillion Boulevard, Crystal Way, Amador Avenue, and Boessow Road.

Non-Participating Properties

Development is not proposed within the Non-Participating Properties, and all existing uses outside of the Simmerhorn Ranch Project Site would be retained. Thus, approval of the project would not result in any direct impacts related to the scenic quality or character of the 218.5-acre portion of the East Galt Infill Annexation Area outside of the Simmerhorn Ranch Project Site.

The proposed annexation would not involve any changes to land use designations within the Non-Participating Properties. Should future development occur within the Non-Participating Properties, such development would occur separate from the proposed project, and would occur in accordance with the City's existing General Plan land use designations for the Non-Participating Properties. Development of the East Galt Infill Annexation Area under the existing General Plan land use designations was previously analyzed within the City of Galt's General Plan EIR. Considering that the proposed project would not result in the alteration of existing land use designations for any of the Non-Participating Properties, impacts related to the change in visual character or quality of the East Galt Infill Annexation Area resulting from potential future development would be consistent with the analysis presented in the General Plan EIR.

Because the proposed project would not result in development within any of the Non-Participating Properties, and any potential future development within the East Galt Infill Annexation Area would be subject to the land use regulations within the City's General Plan, the proposed annexation would not have the potential to degrade the existing visual character or quality of the Non-Participating Properties.

Simmerhorn Ranch

The 119.6-acre Simmerhorn Ranch portion of the project site has historically been used for small scale farming, cattle grazing, and was previously operated as a dairy farm. A home associated with the past dairy operations, located in the northeast corner of the Simmerhorn Ranch Project Site, is not a part of the proposed project and would remain unchanged with implementation of the Simmerhorn Ranch project. The site is primarily vacant and comprised of ruderal vegetation and a small number of ornamental and other trees, primarily adjacent to existing roadways. Previously, dairy barns, sheds, and a small residential building, existed just east of the midpoint of Marengo Road. However, the foregoing structures were demolished following independent approval of such demolition by Sacramento County.

Construction of the Simmerhorn Ranch project would change the site's existing visual character from a primarily undeveloped, agricultural area, to a residential subdivision with 428 proposed single-family homes, 6.5 acres of park, and an elementary school site. Development of the Simmerhorn Ranch Project Site for low, medium, medium high, park, and quasi-public uses, such as a school, was previously analyzed within the City's General Plan EIR. Although the Simmerhorn Ranch project would include amendments to the General Plan, as shown in Figure 3 and Figure 4, the type and intensity of land uses would remain largely consistent with the current General Plan land use designations for the site.

As such, development of the Simmerhorn Ranch Project Site with the proposed Simmerhorn Ranch project has been previously anticipated and analyzed in the General Plan EIR.

In addition, the proposed Simmerhorn Ranch project would be subject to Design Review by the City of Galt per Chapter 18.68.100 of the Galt Municipal Code. The purpose of Design Review is to establish procedures and standards to promote excellence in site planning and building design, to encourage the harmonious appearance of buildings and sites, to ensure that new and modified uses will be compatible with existing and potential development of the surrounding area, to ensure that projects comply with the design standards and intent of specific plans, and to produce an environment of stable and desirable character.

Because development of the Simmerhorn Ranch Project Site associated with implementation of the proposed project would be largely consistent with the General Plan and subject to the City of Galt's Design Review Process, impacts related to degrading the existing character of the site and its surroundings have been previously analyzed and project-specific impacts would be less than significant.

Conclusion

As discussed above, the proposed project would not directly result in development within any of the Non-Participating Properties, and the proposed development within the Simmerhorn Ranch Project Site would be largely consistent with the City's General Plan and subject to the City of Galt's Design Review process. Therefore, implementation of the proposed project would result in a ***less-than-significant*** impact related to the degradation of the existing visual character or quality of the site.

d. **Non-Participating Properties**

The Non-Participating Properties contain residential and agricultural uses as well as roadways, all of which currently contribute varying amounts of light and glare to the area. Changes are not proposed for any existing development within the Non-Participating Properties. Although the proposed project would not include development activities within the Non-Participating Properties, future development within the Non-Participating Properties could occur in accordance with the City's existing General Plan land use designations for the Non-Participating Properties.

Consequently, existing sources of light and glare would remain unchanged within the Non-Participating Properties. However, following annexation into the City, the Non-Participating Properties could be developed in the future, in accordance with the City's existing General Plan land use designations for the properties. Potential future development of the Non-Participating Properties, although not anticipated at this time, would have the potential to introduce new sources of light and glare into an area that currently has minimal light or glare. Thus, the impact is considered potentially significant.

Simmerhorn Ranch

The Simmerhorn Ranch Project Site is predominantly agricultural land with few existing sources of light or glare. The only existing sources of light and glare within the Simmerhorn Ranch Project Site are the existing residences, located at the northeast corner of the Simmerhorn Ranch Project Site. Structures previously existed within the center of the Simmerhorn Ranch Project Site and could have contributed light and glare within the area;

however, all such structures were recently demolished. It should be noted that the existing residences within the northeast portion of the Simmerhorn Ranch Site would remain unchanged with implementation of the proposed project. The change from a predominantly agricultural area to a development containing residential and public/quasi-public uses would generate new sources of light. In addition, new sources of potential glare, such as windows or other potentially reflective surfaces or materials, could be introduced by development of new structures. It should be noted that the project site is not located along an air traffic route that could be affected by night lighting on the site. The introduction of new sources of light and glare due to buildout of the project site would substantially alter the predominantly unlit conditions of the Simmerhorn Ranch Project Site. Night lighting would be evident to neighboring properties to the north and west.

In an effort to minimize impacts, new sources of lighting would be required to comply with all applicable goals and policies in the City's General Plan, and the City of Galt's Municipal Code. The proposed project would implement the following General Plan goals and policies that are designed to minimize impacts resulting from new sources of substantial light or glare:

- Policy CC-1.11: Outdoor Lighting. The City shall ensure that future development includes provisions for the design of outdoor light fixtures to be directed/shielded downward and screened to avoid nighttime spillover effects on adjacent land uses and nighttime sky conditions.
- Policy CC-1.12: Reflective Materials. The City shall consider a range of building materials to ensure that future building design reduces the impacts of daytime glare.

Despite the required compliance of development within the Simmerhorn Ranch Project Site with the foregoing General Plan Policies, considering the size of the area proposed for development, the proposed project would substantially increase the amount of light and glare on-site from currently unlit conditions, which could be visible from nearby sensitive visual receptors. Therefore, because the project would introduce land uses and structures that would contribute a substantial amount of new light or glare into an area that currently has minimal light or glare, the impact is considered potentially significant.

Conclusion

Although the Simmerhorn Ranch Project would be largely consistent with the development anticipated for the site by the General Plan and the project would not result in direct development of any of the Non-Participating Properties, development of the Simmerhorn Ranch Project and potential future development within the Non-Participating Properties could result in the creation of substantial new sources of light and glare affecting nighttime views in the area and a ***potentially significant*** impact could occur.

Mitigation Measure(s)

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

Non-Participating Properties/Simmerhorn Ranch

I-1. *Prior to the issuance of building permits for any development on the project site, the project applicant(s) shall submit a lighting plan for the project to the Community Development Department for review and approval. The*

lighting plan shall include, but shall not be limited to, the following provisions:

- *Shield or screen lighting fixtures to direct the light downward and prevent light spill on adjacent properties;*
- *Place and shield or screen flood and area lighting needed for construction activities and/or security so as not to disturb adjacent residential areas and passing motorists;*
- *For public lighting in residential neighborhoods, prohibit the use of light fixtures that are of unusually high intensity or brightness (e.g., harsh mercury vapor, low-pressure sodium, or fluorescent bulbs) or that blink or flash;*
- *Use appropriate building materials (such as low-glare glass, low-glare building glaze or finish, neutral, earth-toned colored paint and roofing materials), shielded or screened lighting, and appropriate signage (in the commercial land use area) to prevent light and glare from adversely affecting motorists on nearby roadways.*

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

Discussion

a,e. According to the California Department of Conservation, the entire annexation includes approximately 43.1 acres of urban and built-up land, 199.0 acres of Farmland of Local Importance, 21.7 acres of Farmland of Statewide Importance, and 72.4 acres of Other Land.[1] Potential impacts related to the conversion/loss of farmland are discussed separately for the Non-Participating Properties and the Simmerhorn Ranch Project Site below. It should be noted that a discussion of the Sacramento Local Agency Formation Commission (LAFCo) policies related to the protection of agricultural resources is presented in Section XI, Land Use and Planning of this IS/MND.

Non-Participating Properties

The Non-Participating Properties contain residential and agricultural uses as well as roadways. In particular, the Non-Participating Properties contain approximately 40.3 acres of urban and built-up land, 80.4 acres of Farmland of Local Importance, 20.9 acres of Farmland of Statewide Importance, and 72.4 acres of Other Land. The Non-Participating Properties are currently designated and zoned as UR by the County of Sacramento. Implementation of the proposed project would result in annexation of the Non-Participating Properties into the City of Galt, as well as designation of such properties under the City's existing General Plan and prezoning of the properties. However, because a development plan for the Non-Participating Properties does not currently exist, existing agricultural operations within the Non-Participating Properties would be intended to continue with implementation of the proposed project. Thus, implementation of the proposed project would not directly result in loss of farmland.

Although the proposed project would not directly result in the loss of farmland within the Non-Participating Properties, development of the Non-Participating Properties could occur through independent future actions in accordance with the proposed City of Galt General

[1] California Department of Conservation. *DOC Maps: Agriculture*. Available at: https://maps.conservation.ca.gov/agriculture/#dataviewer. Accessed October 2019.

Plan land use designations and zoning designations for the Non-Participating Properties. Development of the Non-Participating Properties, and resulting loss in Farmland of Statewide Importance due to development of the Non-Participating Properties accordance with the proposed City of Galt General Plan land use designations has been previously analyzed in the City's General Plan EIR. The 2030 Galt General Plan EIR evaluated the impacts of Prime Farmland conversion that would result from buildout of the General Plan and determined that impacts would remain significant and unavoidable even with implementation of General Plan goals and policies aimed at preserving agricultural lands. Because the 2030 General Plan designated the Non-Participating Properties for development, the conversion of Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use, the project's impact would be less than significant.

Simmerhorn Ranch

The majority of the Simmerhorn Ranch Project Site was previously used for a dairy operation. Based on information from the California Department of Conservation, the Simmerhorn Ranch Project Site contains approximately 2.8 acres of urban and built-up land, 118.6 acres of Farmland of Local Importance, and 0.8 acres of Farmland of Statewide Importance. Urban and built-up land within the Simmerhorn Ranch Project Site includes the area previously developed with structures related to past dairy operations, and structures related to non-participating single-family residences on the northeastern corner of the site.

It should be noted that the proposed project would not block any rural roads, stub existing water or utility lines, or otherwise involve changes in the existing environment which could result in the conversion of agricultural land adjacent to or in the vicinity of the project site to non-agricultural uses.

The Galt General Plan does not identify farmland resources within the project area, and the site is not designated for farmland uses by the Galt General Plan. However, due to the existing California Department of Conservation designations and the existing Sacramento County land use and zoning designations of the site, implementation of the proposed project would convert land designated as Farmland of Local Importance and Farmland of Statewide Importance to non-agricultural uses. Similar to the discussion related to the Non-Participating Properties above, development of the Simmerhorn Ranch Project Site for non-agricultural uses has been previously analyzed in the 2030 Galt General Plan EIR. Although the project would include amendments to the General Plan, the proposed amendment would serve to redistribute uses within the site, and would not result in an increase in the amount of farmland converted from the levels anticipated in the 2030 Galt General Plan EIR. Because the conversion of Farmland of Statewide Importance to non-agricultural uses at the Simmerhorn Ranch Project Site was anticipated in the 2030 Galt General Plan and the project would not alter the amount of farmland converted, the project's impact would be less than significant

Sacramento LAFCo

Sacramento LAFCo is required to make findings regarding five tests of "prime agricultural land" as defined by Government Code §56064. LAFCo has specific qualifications to help define 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 qualifications outlined below. Table 1 compares the characteristics of the proposed East Galt Infill Annexation, as well as the Simmerhorn Ranch Project Site, to the six qualifications outlined by LAFCo.

Table 1
Sacramento LAFCo "Prime Agricultural Land" Comparison

Criteria	Discussion
(a) Land that qualifies for rating as Class I or Class II in the Soil Conservation Service land use capability classification.	All of the on-site soils are in Class III. Class III soils have severe limitations that restrict the choice of plants or that require special or very careful conservation practices. As such, the soils within the East Galt Annexation Area do not meet criteria (a).
(b) Land that qualifies for rating 80 through 100 Storie Index Rating.	The on-site soils have a Storie Index Rating of Grade 4 (21 to 40). Soils with a Storie Index Rating ranging from 21 to 40 are severely limited and require special management. As such, the soils within the East Galt Annexation Area do not meet criteria (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 Simmerhorn Ranch Project Site has previously been used for dairy production activities. However, dairy production at the site ceased approximately 20 years prior to preparation of this analysis. Livestock are not supported for commercial purposes within the remaining portions of the East Galt Annexation Area. As such, the land within the East Galt Annexation Area does not meet criteria (c).
(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 have not been grown in the Simmerhorn Ranch Project Site within the past five years. As such, the land within the Simmerhorn Ranch Site does not meet criteria (d). Some of the Non-Participating Properties do include fruit or nut-bearing trees; however, implementation of the proposed project would not result in the conversion of the existing orchard to non-orchard uses. Although the value of the crops currently produced within the Non-Participating Properties is not currently known by the City, because the proposed project would not include development of the existing orchard, the project would not conflict with LAFCo policies related to the preservation of agricultural resources. Given the above, the currently proposed area of development (i.e., the Simmerhorn Ranch Project Site) 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.	The project site was previously used for dairy production, and has not supported unprocessed agricultural crops with an annual gross value of $400 or more per acre for any three of the past five years. Therefore, the site does not meet criteria (e).

(Continued on next page)

(f) Land which is used to maintain livestock for commercial purposes.	As discussed in criteria (c) above, the Simmerhorn Ranch Project Site was previously used for livestock raising, but livestock production has not occurred on-site in approximately 20 years. Livestock production is not known to occur in any other properties within the East Galt Annexation Area. As such, the land does not meet criteria (f).
Source: Sacramento Local Agency Formation Commission. Policy, Standards and Procedures Manual. September 2007.	

Approval by the Sacramento LAFCo requires special provisions related to Williamson Act territory to be met; however, land within the East Galt Annexation Area is not under a Williamson Act. Therefore, the Sacramento LAFCo goals and provisions related to Williamson Act Territory would not apply to the proposed project.

Although portions of the Simmerhorn Ranch Project Site were previously used for dairy operations, dairy operations within the Simmerhorn Ranch Project Site ceased approximately 20 years ago and have not been subsequently replaced by other agricultural activities. Select area within the Non-Participating Properties do currently contain orchards; however, implementation of the proposed project would not directly result in any changes to the existing orchard operations. The proposed East Galt Infill Annexation represents an orderly reorganization of land, that is consistent with the City of Galt's Sphere of Influence and General Plan.

Considering the above, the project would result in a less-than-significant impact in regard to compliance with LAFCo's policies related to the conversion of agricultural land to urban uses.

Conclusion

As discussed above, the 2030 Galt General Plan EIR anticipated conversion of all agricultural lands within the East Galt Infill Annexation Area to non-agricultural uses, and the project would not conflict with LAFCo policies related to annexations of agricultural land. The proposed project would not increase the amount of agricultural land converted to non-agricultural uses within the East Galt Infill Annexation Area, and, consequently, the project's impact related to the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses, and other changes that could result in conversion of farmland to non-agricultural uses would be ***less than significant***.

b. Non-Participating Properties/Simmerhorn Ranch Project

Neither the East Galt Infill Annexation Area, nor any portion thereof, is under a Williamson Act contract.[2] The East Galt Infill Annexation Area is currently located within Sacramento County, though the project site is within the City of Galt Sphere of Influence (SOI) and designated for urban development in the Galt General Plan. Current County zoning for the project site is AC, AR-1, AR-2, AR-5, AR-10, but consistent with the Cortese-Knox-Hertzberg Local Government Reorganization Act, prezoning shall be applied to East Galt Infill Annexation Areas (see Gov. Code Section 56375). The project site would be prezoned to be consistent with the Galt General Plan designations for residential, light industrial, mixed use, open space, commercial and public uses for the project site. The

[2] Sacramento County. *Sacramento County Open Data: Williamson Act Parcels*. Available at: http://data-sacramentocounty.opendata.arcgis.com/datasets/199810930ef9465a9a1ae0315e5a7535_0?geometry=-121.343%2C38.247%2C-121.216%2C38.271. Accessed November 2019.

conversion of the Simmerhorn Ranch Project Site to residential and public/quasi-public land uses would be generally consistent with the urban land use designations in the Galt General Plan for the Simmerhorn Ranch Project Site. Although development is not currently proposed within the Non-Participating Properties, should future development activity occur in these areas, such development would be anticipated to occur in a manner consistent with the existing General Plan land use designations for the Non-Participating Properties. Therefore, the proposed project would result in a ***less-than-significant*** impact with regard to land that is currently zoned for agricultural use or under a Williamson Act contract.

c,d. The project site is not considered forest land (as defined in Public Resources Code section 12220[g]), timberland (as defined by Public Resources Code section 4526), and is not zoned Timberland Production (as defined by Government Code section 51104[g]). The project site is not currently zoned as forest land or for timber production. Therefore, the proposed project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production, and the project would not otherwise result in the loss of forest land or conversion of forest land to non-forest use. Thus, ***no impact*** would occur.

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

Discussion

a,b. The City of Galt is located within the boundaries of the Sacramento Valley Air Basin (SVAB) and under the jurisdiction of the Sacramento Metropolitan Air Quality Management District (SMAQMD). Federal and State ambient air quality standards (AAQS) have been established for six common air pollutants, known as criteria pollutants, due to the potential for pollutants to be detrimental to human health and the environment. The criteria pollutants include particulate matter (PM), ground-level ozone, carbon monoxide (CO), sulfur oxides, nitrogen oxides (NO_X), and lead. At the federal level, Sacramento County is designated as severe nonattainment for the 8-hour ozone AAQS, nonattainment for the 24-hour $PM_{2.5}$ AAQS, and attainment or unclassified for all other criteria pollutant AAQS. At the State level, the area is designated as a serious nonattainment area for the 1-hour ozone AAQS, nonattainment for the 8-hour ozone AAQS, nonattainment for the PM_{10} and $PM_{2.5}$ AAQS, and attainment or unclassified for all other State AAQS.

Due to the nonattainment designations, SMAQMD, along with the other air districts in the SVAB region, is required to develop plans to attain the federal and State AAQS for ozone and particulate matter. The attainment plans currently in effect for the SVAB are the 2013 Revisions to the Sacramento Regional 8-Hour Ozone Attainment and Reasonable Further Progress Plan (2013 Ozone Attainment Plan), $PM_{2.5}$ Implementation/Maintenance Plan and Re-designation Request for Sacramento $PM_{2.5}$ Nonattainment Area ($PM_{2.5}$ Implementation/Maintenance Plan), and the 1991 Air Quality Attainment Plan (AQAP), including triennial reports. 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.

Nearly all development projects in the Sacramento region have the potential to generate air pollutants that may increase the difficultly of attaining federal and State AAQS. Therefore, evaluation of air quality impacts is required. In order to evaluate ozone and other criteria air pollutant emissions and support attainment goals for those pollutants that the area is designated nonattainment, SMAQMD has developed the Guide to Air Quality Assessment in Sacramento County (SMAQMD Guide), which includes recommended thresholds of significance, including mass emission thresholds for construction-related and operational ozone precursors, as the area is under nonattainment for ozone. The SMAQMD's recommended thresholds of significance for the ozone precursors reactive organic compounds (ROG) and NO_X, which are expressed in pounds per day (lbs/day), are presented in Table 2.

Table 2
SMAQMD Thresholds of Significance (lbs/day)

Pollutant	Construction Thresholds	Operational Thresholds
ROG	N/A	65
NO_X	85	65
PM_{10}	80	80
$PM_{2.5}$	82	82

Source: SMAQMD, May 2015.

Non-Participating Properties

Implementation of the proposed project would involve annexation of the Non-Participating Properties; however, applications for development of any of the Non-Participating Properties have not been submitted to the City. Consequently, any development of the Non-Participating Properties is speculative at this time. Although such development is speculative, future buildout of the Non-Participating Properties has been anticipated within the City of Galt's General Plan and analyzed within the General Plan EIR. Because potential future development within the Non-Participating Properties would be required to occur in compliance with existing General Plan land use designation, any potential future impacts resulting from buildout of the Non-Participating Properties have been previously anticipated and the proposed annexation would not result in any new or more severe impacts from what has been previously anticipated. Consequently, the a less-than-significant impact would occur from annexation of the Non-Participating Properties.

Simmerhorn Ranch Project

Implementation of the Simmerhorn Ranch Project would involve development of the Simmerhorn Ranch Project Site with a variety of uses that were previously anticipated for the project site in the City's General Plan. Although the uses proposed for development within the Simmerhorn Ranch Project Site would be similar to the uses anticipated for the site by the General Plan, considering the size of the Simmerhorn Ranch Project and the proposed General Plan Amendments, the project has been further analyzed as discussed below.

The project's construction and operational emissions were quantified using the California Emissions Estimator Model (CalEEMod) software version 2016.3.2 - a Statewide model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify air quality emissions, including greenhouse gas (GHG) emissions, from land use projects. The model applies inherent default values for various land uses, including construction data, vehicle mix, trip length, average speed, etc. Where project-specific information is available, such information should be applied in the model. Accordingly, the project's modeling assumed the following:

- Construction would occur over an approximately two-and-a-half-year period;
- Demolition of 40,000 sf of on-site structures occurred in December 2019;
- The remaining construction activity associated with the project would begin in Spring of 2021;
- Development of the entire Simmerhorn Ranch Site would occur in one extended construction phase;
- Off-site improvements would include construction of connections to sewer lines, storm drainage infrastructure, and water lines in the project vicinity;
- A total of 119 acres would be disturbed during project construction;

- Trip generation rates were updated based on the Traffic Impact Study prepared by GHD for the proposed project;
- All proposed residences were assumed to include natural gas hearths, based on applicant provided information; and
- Approximately 25 percent of roadways within the project site would be designed with traffic calming devices.

As noted in Section E of this document and in the list above, demolition of the existing structures within the Simmerhorn Ranch Project Site occurred through approvals obtained from Sacramento County. Despite demolition activity already having occurred, in order to ensure that all potential emissions from implementation of the Simmerhorn Ranch Project are considered within this analysis, emissions related to demolition activity have been quantified and are presented herein. It should be further noted that emissions estimates for the Simmerhorn Ranch Project were based on earlier versions of the proposed site plan, which included 438 residential units. The plans for the Simmerhorn Ranch Project have since been updated and buildout of the Simmerhorn Ranch Site is now anticipated to involve construction of a maximum of 429 residential units. The difference in units would not be anticipated to result in substantial changes in construction or operational emissions from the proposed project, and any such changes would reduce the intensity of project-related emissions from the levels presented within this analysis. Consequently, the emissions estimates presented within this document likely represent a conservative estimate of future emissions.

The project's estimated emissions associated with construction and operations are presented and discussed in further detail below. A discussion of the project's contribution to cumulative air quality conditions is provided below as well. All CalEEMod results are included in Appendix A of this IS/MND.

Construction Emissions

According to the CalEEMod results, the proposed project would result in maximum unmitigated construction criteria air pollutant emissions as shown in Table 3. As shown in the table, the project's construction emissions would be below the applicable SMAQMD thresholds of significance for NO_X, ROG, PM_{10}, and $PM_{2.5}$. In addition, development within the project site would be required to comply with the SMAQMD Basic Construction Emission Control Practices, which would likely further reduce emissions beyond the estimates shown in the table below. Thus, in accordance with SMAQMD guidance, the proposed project would be considered to have a less-than-significant impact on air quality during construction.

Table 3
Maximum Unmitigated Construction Emissions (lbs/day)

Pollutant	Proposed Project Emissions	Threshold of Significance	Exceeds Threshold?
ROG	11.20	N/A	**NO**
NO_X	62.95	85	**NO**
PM_{10}	20.25	80	**NO**
$PM_{2.5}$	11.85	82	**NO**

Source: CalEEMod, February 2020 (see Appendix A).

Operational Emissions

According to the CalEEMod results, the proposed project would result in maximum unmitigated operational criteria air pollutant emissions as shown in Table 4. As shown in the table, the project's operational emissions would be below the applicable thresholds of significance. As such, the proposed project would not result in a significant air quality impact during operations.

Table 4
Maximum Unmitigated Operational Emissions (lbs/day)

Pollutant	Proposed Project Emissions	Threshold of Significance	Exceeds Threshold?
ROG	27.49	65	**NO**
NO_X	23.86	65	**NO**
PM_{10}	23.29	80	**NO**
$PM_{2.5}$	6.56	82	**NO**

Source: CalEEMod, February 2020 (see Appendix A).

Cumulative Emissions

Past, present, and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By nature, air pollution is largely a cumulative impact. A single project is not sufficient in size to, by itself, result in nonattainment of AAQS. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant. In developing thresholds of significance for air pollutants, SMAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. The thresholds of significance presented in Table 2 represent the levels at which a project's individual emissions of criteria air pollutants or precursors would result in a cumulatively considerable contribution to the SVAB's existing air quality conditions. Because the proposed project would result in emissions below the applicable thresholds of significance established by SMAQMD for criteria pollutants, the project would not result in a cumulatively considerable contribution to the region's existing air quality conditions.

Conclusion

As discussed above, both construction-related and operational emissions resulting from implementation of the proposed project would be below SMAQMD's applicable thresholds of significance. Because the proposed project would result in emissions below the applicable thresholds of significance during both construction and operations, the proposed project would not violate an AAQS, contribute substantially to an existing or projected air quality violation, or result in PM concentrations greater than the applicable thresholds. Thus, a ***less-than-significant*** impact would result.

c. Some land uses are considered more sensitive to air pollution than others, due to the types of population groups or activities involved. Heightened sensitivity may be caused by health problems, proximity to the emissions source, and/or duration of exposure to air pollutants. Children, pregnant women, the elderly, and those with existing health problems are especially vulnerable to the effects of air pollution. Sensitive receptors are typically defined as facilities where sensitive receptor population groups (i.e., children, the elderly, the acutely ill, and the chronically ill) are likely to be located. Accordingly, land uses that are typically considered to be sensitive receptors include residences, schools,

playgrounds, childcare centers, retirement homes, convalescent homes, hospitals, and medical clinics.

The East Galt Infill Annexation Area contains numerous existing residences and is in proximity to existing residences. In particular, residences exist along the northern boundary of the East Galt Infill Annexation Area, as well as in close proximity to the northeast, southeast, and southwest corners of the East Galt Infill Annexation Area.

As noted throughout this analysis, the development plans have not been proposed within any of the Non-Participating Properties at this time. However, the Simmerhorn Ranch Project Site is proposed for development, and is in close proximity to existing residences. In particular, existing residences are located to the west, north, and southeast of the Simmerhorn Ranch Site. Additionally, the Simmerhorn Ranch Site contains a parcel in the northeast corner that is not a part of the subdivision of the Simmerhorn Ranch Project Site; the parcel not included in the Simmerhorn Ranch subdivision contains an existing residence.

Non-Participating Properties

Development of the Non-Participating Properties is not proposed at this time. As such, the existing residential and agricultural uses within the Non-Participating Properties would be anticipated to continue. Operations of residential uses do not typically result in the emission of pollutants of concern. Agricultural activities can often include minimal emissions of pollutants, such as pollutants related to the use diesel powered agricultural equipment or agricultural chemical use. However, considering the limited nature of existing agricultural uses within the Non-Participating Properties, such agricultural activities within the Non-Participating Properties are not anticipated result in substantial pollutant emissions. Furthermore, the proposed project would not result in any increase in agriculture-related emissions relative to existing conditions.

Following annexation of the Non-Participating Properties, the potential exists that future development within the Non-Participating Properties could occur. Such development would be required to comply with the existing General Plan land use designations for the project site, which include a mixture of residential, commercial, light industrial, public/quasi-public, park, and open space designations. Residential, mixed use, public/quasi-public, park, and open space uses are not typically considered sources of substantial emissions. light industrial and commercial developments can, in some cases, result in emission of pollutants; however, should future light industrial or commercial developments include sources of emissions, such uses would be subject to relevant SMAQMD rules and regulations. For instance, SMAQMD's Rule 202 requires that any new or modified stationary sources of air pollution obtain an authority to construct and permit to operate prior to installation and operations, respectively. Prior to issuance of an authority to construct or permit to operate, SMAQMD would assess the potential for the source to result in the exposure of receptors to substantial pollutant concentrations.

Considering the speculative nature of future development within the Non-Participating Properties, as well as the existing regulations related to the permitting of new sources of emissions, implementation of the proposed project would not result in the exposure of sensitive receptors to substantial pollutant concentrations due to the annexation of the Non-Participating Properties.

Simmerhorn Ranch Site

The Simmerhorn Ranch Project would include development of the Simmerhorn Ranch Project Site with residential, open space, and public/quasi-public uses, which are anticipated to include a school and park uses. Typically, such uses are not associated with emissions of substantial pollutants. Nevertheless, the following section provides further analysis related to major pollutants of concern. The major pollutant concentrations of concern are localized carbon monoxide (CO) emissions and toxic air contaminant (TAC) emissions, as well as regional effects of emissions of criteria pollutants, which are addressed in further detail below.

Localized CO Emissions

Localized concentrations of CO are related to the levels of traffic and congestion along streets and at intersections. 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. Consequently, the proposed project is not anticipated to result in significant impacts to air quality related to localized CO emissions.

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, distribution centers, and rail yards.[3] The CARB has identified diesel particulate matter (DPM) from diesel-fueled engines as a TAC; thus, high volume freeways, stationary diesel engines, and facilities attracting heavy and constant diesel vehicle traffic are identified as having the highest associated health risks from DPM. 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 nearest sensitive receptor to the Simmerhorn Ranch Project development area is the existing residence located at the northeastern corner of the Simmerhorn Ranch Project Site (this residence is not a part of the proposed subdivision). Outside of the project site, the nearest sensitive receptors are residences within the Non-Participating Properties to the north and northwest of the project site, as well as residences outside of the East Galt Infill Annexation Area to the southwest and southeast of the Simmerhorn Ranch Project Site.

The proposed project does not include any operations that would be considered a substantial source of TACs. Accordingly, operations of the proposed project would not expose sensitive receptors to excess concentrations of TACs.

Construction-related activities have the potential to generate concentrations of TACs, specifically DPM, from on-road haul trucks and off-road equipment exhaust emissions. However, construction would be temporary and would occur over a relatively short duration in comparison to the operational lifetime of the proposed project. While methodologies for conducting health risk assessments are associated with long-term exposure periods (e.g., over a 30-year period or longer), construction activities associated with the proposed project were estimated to occur over an approximately two-and-a-half-

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

year period, which would include all off-site work as well. Only portions of the site or off-site improvement areas would be disturbed at a time throughout the construction period, with operation of construction equipment occurring intermittently throughout the course of a day rather than continuously at any one location on the project site or within the off-site improvement areas. In addition, all construction equipment and operation thereof would be regulated per the In-Use Off-Road Diesel Vehicle Regulation. The In-Use Off-Road Diesel Vehicle Regulation includes emissions reducing requirements such as limitations on vehicle idling, disclosure, reporting, and labeling requirements for existing vehicles, as well as standards relating to fleet average emissions and the use of Best Available Control Technologies. Additionally, DPM is a highly dispersive gas, and concentrations of DPM decline rapidly with distance.[4] The Simmerhorn Ranch Project Site is approximately 119 acres, and development activity would occur over portions of the site at any given time. Considering the large area of the site, most construction activity would occur with ample separation from existing developments, which would allow for ample dispersion of construction-related DPM, prior to DPM emissions reaching any nearby receptors. Thus, the likelihood that any one sensitive receptor would be exposed to high concentrations of DPM for any extended period of time would be low, and the Simmerhorn Ranch Project would not expose any existing sensitive receptors to any new permanent or substantial TAC emissions.

Criteria Pollutant Emissions

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 potential health impacts resulting from the emission of criteria pollutants during operations of proposed projects. Although analysis of project-level health risks related to the emission of CO and TACs has long been practiced under CEQA, the analysis of health impacts due to individual projects resulting from emissions of criteria pollutants is a relatively new field. In fact, the analysis of potential health impacts resulting from criteria pollutant emissions has long been focused on a regional or air basin wide level. The reason for a wide geographic focus on health impacts from criteria pollutants is that criteria pollutants act on a large, regional scale, whereas TACs and CO act on a more localized level. For instance, according the CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*, health impacts related to many common sources of TACs are experienced within the first 500 to 1,000 feet from a source of emissions.[5] The localized nature of impacts from TACs allows for dispersion modeling of TACs to be undertaken with a detailed scope of focus and high degree of confidence. In contrast, health risks from criteria pollutants occur over entire air basins, such as the Sacramento Federal Nonattainment Area (SFNA) for ground-level ozone, which encompasses all of Sacramento and Yolo counties, and portions of Placer, El Dorado, Solano, and Sutter counties.

In many cases, the concern regarding health risks from criteria pollutants is not related to the specific pollutant itself, such as ROG or NO_X, but the potential for the pollutant to undergo reactions within the atmosphere and form secondary pollutants, such as ozone. In such cases, the secondarily formed ozone is the pollutant of concern related to health risks, rather than the pollutant ROG or NO_X itself. The formation of ozone is dependent upon various regional factors, including the presence or absence of chemicals and elements in the atmosphere, geography of the given area, the presence of solar energy,

[4] California Air Resources Board. *Air Quality and Land Use Handbook: A Community Health Perspective*. April 2005.
[5] California Air Resources Board. *Air Quality and Land Use Handbook: A Community Health Perspective*. April 2005.

as well as meteorological and climatological conditions. In addition, while PM can be emitted directly to the atmosphere by projects, PM can also be formed secondarily by precursor emissions. Thus, the formation of PM can similarly be dependent on regional atmospheric chemistry, geography, weather, and climate. The complex reactions and conditions that lead to the formation of ozone and PM in the atmosphere can also result in the transport of pollutants over wide areas. For instance, transport of emissions from development within the San Francisco Bay Area are often cited as a leading cause of poor air quality in the SFNA. The potential for criteria pollutant emissions to be transported over wide areas means that the emissions of ozone precursor pollutants, such as ROG and NO_X, from a single project does not necessarily translate directly into a specific concentration of ozone, or a specific level of health risk, in that area.

In December of 2019, SMAQMD released the *Draft Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District* (Draft Guidance) for the analysis of criteria emissions in areas within the District's jurisdiction.[6] The Draft 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 Draft 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 draft 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 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.[7] Considering the proposed project would result in emissions lower than the SMAQMD's thresholds of significance, the project would qualify for the Minor Project Health Effects Screening Tool. Based on the Minor Project Health Effects Screening Tool, the proposed project would result in 1.21 premature deaths per year due to the project's PM impacts, and would result in 0.019 premature deaths per year due to the project's ozone impacts (see Appendix A). Such numbers represent a very small increase over the background incidence of pre-mature deaths due to PM and ozone concentrations (0.00065 percent and 0.0002 percent, respectively).

As discussed above, the nature of criteria pollutants is such that the emissions from an individual project cannot be directly identified as responsible for health impacts within any specific geographic location. As a result, attributing health risks at any specific geographic location to a single proposed project is not feasible. Nonetheless, the results of the Minor Project Health Effects Screening Tool have been presented for informational purposes. Overall, because the proposed project would be relatively small compared to the regional growth and development that drives health impacts from criteria pollutants, and the anticipated air quality emissions would fall below all applicable thresholds of significance, potential health impacts related to criteria air pollutants would be less-than-significant.

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6 Sacramento Metropolitan Air Quality Management District. *Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District*. December, 2019.

7 Sacramento Metropolitan Air Quality Management District. *Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District* [pgs 5-10]. January 31, 2020.

Conclusion

Based on the above discussion, the East Galt Infill Annexation Project would not expose any sensitive receptors to substantial concentrations of pollutants, including localized CO, TACs, or criteria air pollutants during construction or operation. Therefore, the East Galt Infill Annexation Project would result in a ***less-than-significant*** impact related to the exposure of sensitive receptors to substantial pollutant concentrations.

d. Non-Participating Properties/Simmerhorn Ranch Project

While offensive odors rarely cause physical harm, they can be unpleasant, leading to considerable annoyance and distress among the public and can generate citizen complaints to local governments and air districts. Due to the subjective nature of odor impacts, the number of variables that can influence the potential for an odor impact, and the variety of odor sources, quantitative or formulaic methodologies to determine the presence of a significant odor impact do not exist. Adverse effects of odors on residential areas and other sensitive receptors warrant the closest scrutiny; but consideration should also be given to other land use types where people congregate, such as recreational facilities, worksites, and commercial areas. 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.

Examples of land uses that have the potential to generate considerable odors include, but are not limited to, wastewater treatment plants, landfills, confined animal facilities, composting stations, food manufacturing plants, refineries, and chemical plants. The proposed project would not introduce any such land uses. Furthermore, residential, parkland, and educational land uses are not typically associated with the creation of substantial objectionable odors. As a result, operations of the Simmerhorn Ranch Project would not create any objectionable odors that would affect a substantial number of people. Because development of the Non-Participating Properties is not proposed at this time, annexation of the Non-Participating Properties as part of the proposed project would not result in any new sources of odors.

Should future development within the Non-Participating Properties occur, such development would be subject to all relevant regulations related to odors. The SMAQMD regulates objectionable odors through Rule 402 (Nuisance), which prohibits any person or source from emitting air contaminants that cause detriment, nuisance, or annoyance to a considerable number of persons or the public. Rule 402 is enforced based on complaints. If complaints are received, the SMAQMD is required to investigate the complaint, as well as determine and ensure a solution for the source of the complaint, which could include operational modifications. Thus, although not anticipated, if odor complaints are made after the proposed project is approved, the SMAQMD would ensure that such odors are addressed and any potential odor effects reduced to less than significant.

Although neither the Simmerhorn Ranch Project nor the Non-Participating Properties include any new land uses that are typically associated with the creation of odors, the Simmerhorn Ranch Project would include the installation of a sewer lift station. The City of Galt's *Sanitary Sewer Management Plan* (SSMP) includes specifications for the design of sewer lift stations. The specifications are intended to ensure the safe and sanitary operations of all lift station within the City. Furthermore, as specified in the SSMP, the City regularly maintains and inspects all lift stations within the City. In addition to the regularly

scheduled maintenance inspections, City staff respond to any odor complaints received related to odors.[8] Design of the proposed lift stations in compliance with City standards would ensure that the proposed lift station would not result in substantial odors, and, should odor complaints be received regarding the proposed lift station, City staff would investigate the source of the odors and implement operational modifications sufficient to substantively eliminate the odors..

Considering the above, the proposed project would not be anticipated to create any objectionable odors that would affect a substantial number of people, a ***less-than-significant*** impact would result.

[8] City of Galt. *Sanitary Sewer Management Plan*. July 2009.

IV. BIOLOGICAL RESOURCES. *Would the project:*	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	✖	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	✖	☐	☐
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	✖	☐	☐
d. Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?	☐	✖	☐	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	✖	☐	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	✖	☐

Discussion

a. The following discussion is based primarily on a Memorandum prepared for the East Galt Infill Annexation Area,[9] a Biological Resources Assessment (BRA) prepared Simmerhorn Ranch Project Site,[10] and a Special-Status Plant Survey Report[11] by ECORP (see Appendix B). It should be noted that for the purposes of analyzing potential impacts to biological resources from implementation of the Simmerhorn Ranch Project, ECORP considered potential impacts that could occur due to the proposed development within the Simmerhorn Ranch Project Site as well as off-site sewer infrastructure improvements that would be outside of the Simmerhorn Ranch Project Site, but within the East Galt Infill Annexation Area. A general description of the existing habitats and special-status species with the potential to occur within the entire East Galt Infill Annexation Area, including the Simmerhorn Ranch Project Site, is provided below.

Currently, the existing land uses within the Non-Participating Properties consist of agricultural land with dispersed single-family residences and related infrastructure. The Simmerhorn Ranch Project Site consists of agricultural land with dairy infrastructure and a rural residence located within the central eastern portion of the site. A small rural

[9] ECORP Consulting, Inc. *Biological Resources Assessment: East Galt Infill Annexation Area.* June 19, 2019

[10] ECORP Consulting, Inc. *Biological Resources Assessment, Simmerhorn Ranch Project, Sacramento County, California.* May 2019.

[11] ECORP Consulting, Inc. *Special-Status Plant survey Report, Simmerhorn Ranch Project, Sacramento County, California.* December 2019.

residence is also located in the northeastern portion of the Simmerhorn Ranch Site and would remain unchanged with implementation of the proposed project.

The entire East Galt Infill Annexation Area is located within the boundaries of the *South Sacramento Habitat Conservation Plan* (SSHCP), which is intended to provide an effective framework to protect natural resources in south Sacramento County, including special-status species. As part of the preparation of the SSHCP, land cover types for all areas within the SSHCP area were classified. Figure 11 presents the land cover types present within the East Galt Infill Annexation Area as determined by the SSHCP. Subsequent to preparation of the SSHCP, ECORP performed a site assessment for the Simmerhorn Ranch Project Site and prepared a revised land cover map for the Simmerhorn Ranch Project Site, which is presented in Figure 12.

After determining the land cover types present within the East Galt Infill Annexation Area, ECORP analyzed the potential for special-status species to occur within the identified land cover types. For the purposes of the BRA and special-status plant surveys, special-status species are defined as wildlife or plants that meet one or more of the following criteria, as applicable:

- Species that are listed, proposed for listing, or candidates for future listing as threatened or endangered under the Federal Endangered Species Act (FESA);
- Species that are listed or candidates for future listing as threatened or endangered under the California Endangered Species Act (CESA);
- Species that meet the definitions of endangered or rare under § 15380 of the CEQA Guidelines;
- Species that are identified as a Species of Special Concern (SSC) by the California Department of Fish and Wildlife (CDFW);
- Species that are birds identified as Birds of Conservation Concern by the United States Fish and Wildlife Service (USFWS);
- Species that are considered by the California Native Plant Society (CNPS) to be "rare, threatened, or endangered in California", “plants about which more information is needed”, or “plants of limited distribution – a watch list” (i.e., species with a CNPS California Rare Plant Rank of 1B, 2, 3, or 4);
- Species that are plants listed as rare under the Native Plant Protection Act (California Fish and Game Code, § 1900 et seq.);
- Species that are fully protected in California in accordance with the California Fish and Game Code, §§ 3511 (birds), 4700 (mammals), 5050 (amphibians and reptiles), and 5515 (fishes); or
- Species that are Covered Species as defined by the South Sacramento Habitat Conservation Plan (SSHCP).

ECORP used a combination of literature review and field assessments to determine the presence or absence of special-status species. In particular, the following literature sources were reviewed:

- CDFW’s California Natural Diversity Database (CNDDB);
- USFWS Resource Report List Federal Endangered and Threatened Species;
- USFWS Information, Planning, and Consultation System Resource Report List;
- CNPS’s electronic Inventory of Rare and Endangered Plants of California; and
- The SSHCP-Modeled Species Habitat data.

Figure 11
SSHCP Land Cover Types

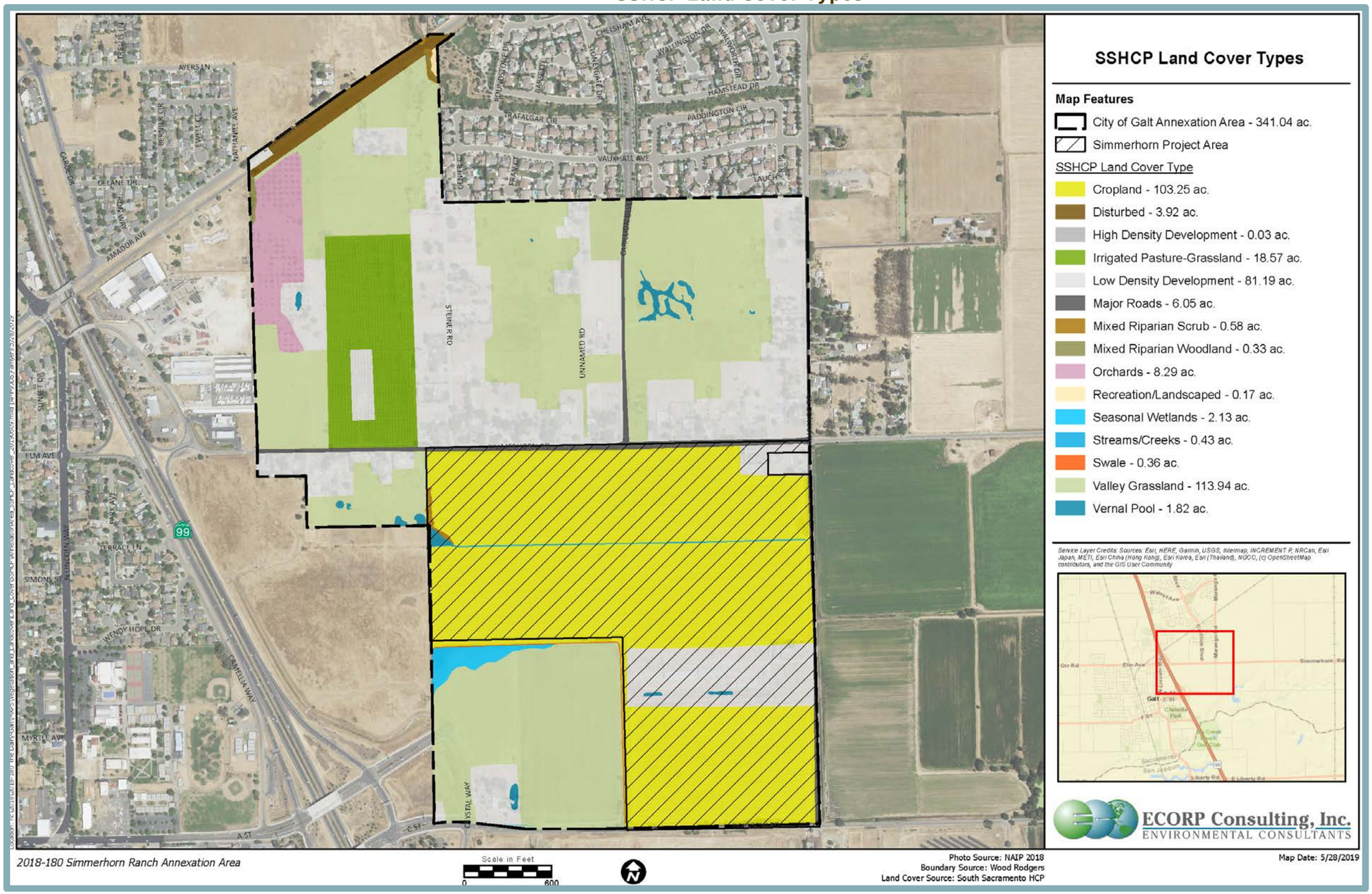
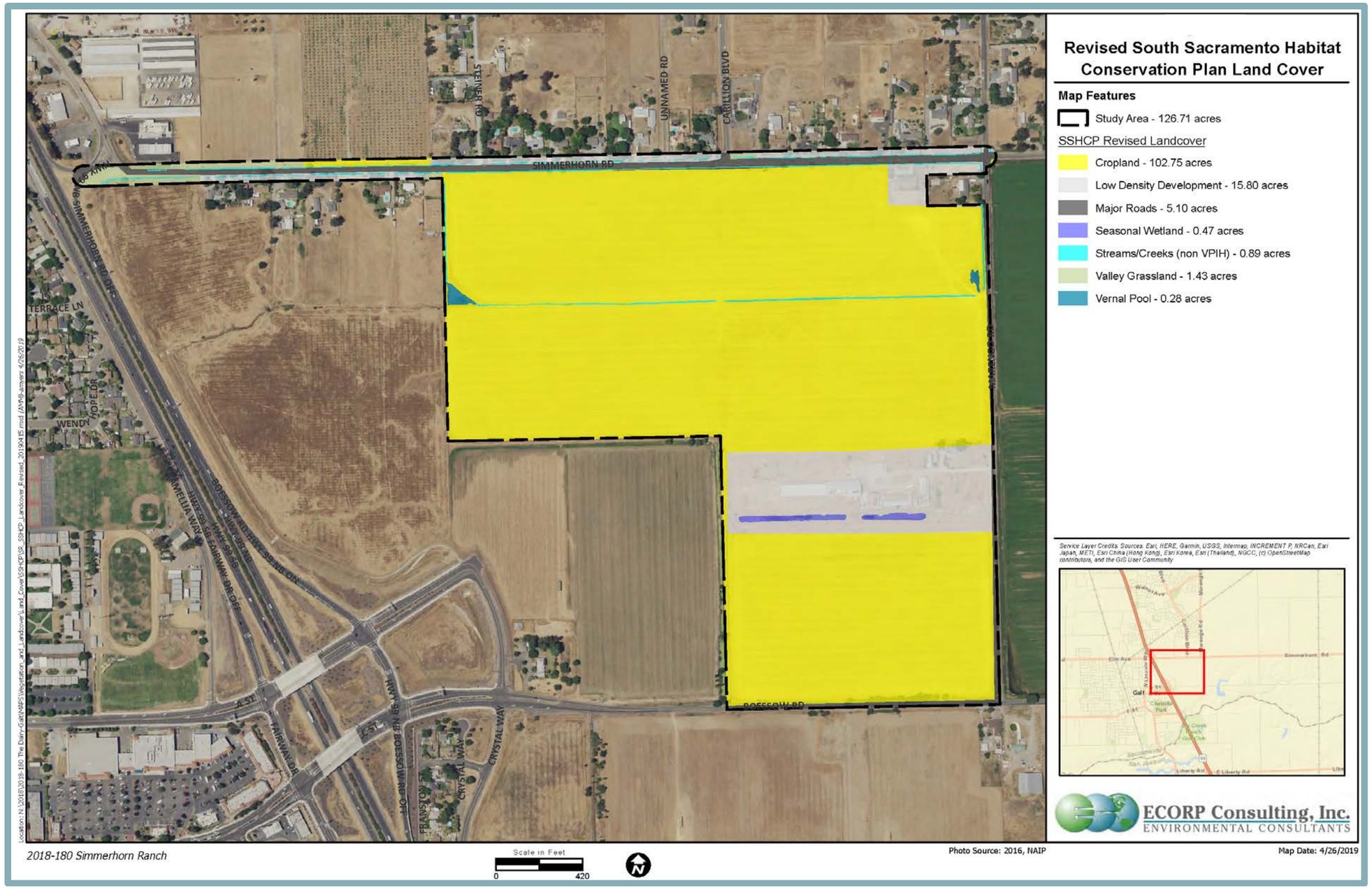


Figure 12
Revised Simmerhorn Ranch



In addition to the literature reviews conducted by ECORP site visits were conducted of the Simmerhorn Ranch Project Site on November 7, 2018, April 4 and 24 of 2019, and June 20, 2019. Further information related to the methods applied during the field surveys is presented in Appendix B.

Based on the Memorandum, the entire East Galt Infill Annexation Area contains potential habitat for 27 SSHCP Covered Species and 34 additional special-status species, for a total of 61 species.

The potential for species covered by the SSHCP and other special-status species to occur within the East Galt Infill Annexation Area, including the Non-Participating Properties and the Simmerhorn Ranch Project Site, is discussed in further detail below.

Special-Status Plants

Special-status plants generally occur in relatively undisturbed areas within vegetation communities such as vernal pools, marshes and swamps, chenopod scrub, seasonal wetlands, riparian scrub, chaparral, alkali playa, dunes, and areas with unusual soil characteristics.

ECORP used information based on literature and aerial photo assessments prepared for the East Galt Infill Annexation Area, including the Non-Participating Properties and the Simmerhorn Ranch Project Site, to determine that 27 special-status plant species could occur within the project area. However, based on existing site conditions, eight of the 27 species have a low potential to occur within the East Galt Infill Annexation Area, and five of the remaining 19 species have the potential to occur within the East Galt Infill Annexation.

Non-Participating Properties

As further discussed in the Memorandum prepared for the East Galt Infill Annexation Area, the Non-Participating Properties include valley grasslands, vernal pools, other wetland areas, and SSHCP modeled habitat for several special-status plant species. Because a development plan for the Non-Participating Properties does not currently exist, existing land covers are anticipated to persist within the Non-Participating Properties, and special-status species are not anticipated to be directly impacted by implementation of the proposed project.

Although the proposed project would not directly result in direct impacts to special-status plants within the Non-Participating Properties, development of the Non-Participating Properties could occur through independent future actions in accordance with the proposed City of Galt General Plan land use designations and zoning designations for the Non-Participating Properties. If special-status plants exist within the Non-Participating Properties, potential future development of the Non-Participating Properties, could result in land disturbance and direct or indirect adverse impacts to special-status plants. Thus, without compliance with the SSHCP or implementation of other mitigation measures potential future development within the Non-Participating Properties could result in impacts related to special-status plants.

Simmerhorn Ranch

According to the Special-Status Plant Survey Report prepared for the Simmerhorn Ranch Project Site, a total of 13 special-status plant species have the potential to occur within

the Simmerhorn Ranch Project Site. Of the 13 special-status plants with the potential to occur within the Simmerhorn Ranch Project Site, four are SSHCP-covered species. The SSHCP-covered species include: dwarf downingia, Boggs Lake hedge-hyssop, legenere, and Sanford's arrowhead. The remaining nine species are not SSHCP-covered, but are considered special-status and include, valley brodiaea, bristly sedge, succulent owl's clover, Parry's rough tarweed, hogwallow starfish, Ferris' goldfields, Heckard's pepper-grass, hoary navarretia, and saline clover.

To determine the presence or absence of the foregoing species field surveys were conducted on April 24 and June 20 of 2019. Special-status plant species were not identified during either of the site surveys. Although special-status plants were not identified within the Simmerhorn Ranch Project Site, the USFWS only considers plant surveys to be valid for three years. Should project construction not occur within three years from the date of the survey, construction activity could impact special-status plant species that may have colonized the project site. Therefore, impacts related to the disturbance of special-status plant species would be potentially significant.

Special-Status Wildlife

Many of the 34 special-status wildlife species identified as a result of the CNDDB search have habitat requirements that are not present on the project site (i.e., chaparral, oak woodland, etc.). As noted previously, the East Galt Infill Annexation Area has been disturbed through past agricultural uses and previous development. Per the Memorandum prepared for the East Galt Infill Annexation Area, 22 special-status wildlife have the potential to occur within the Non-Participating Properties while 21 special-status wildlife have the potential to occur within the Simmerhorn Ranch Project Site. Furthermore, other avian species protected by the MBTA could use the existing grassland as foraging and potential nesting habitat.

Invertebrates

Per the Memorandum and the BRA, the Non-Participating Properties and the Simmerhorn Ranch Project Site consist of SSCHCP modeled habitat for five different invertebrate species. The five species include vernal pool fairy shrimp, midvalley fairy shrimp, valley elderberry longhorn beetle, Ricksecker's water scavenger beetle, and vernal pool tadpole shrimp. The aforementioned species are often known to occur within vernal pool and riparian habitat which is present throughout both the Non-Participating Properties and the Simmerhorn Ranch Project Site. Thus, the proposed project could result in a potentially significant impact to invertebrates known to occur in the East Galt Infill Annexation Area.

California Tiger Salamander

Per the Memorandum and the BRA, the project site contains vernal pool and valley grassland which could provide habitat for the California tiger salamander. The East Galt Infill Annexation Area is within the SSHCP modeled range of the species and contains land mapped as aquatic habitat. While a site survey was not conducted, the proposed project could result in a significant impact to the California tiger salamander.

Western Spadefoot

The East Galt Infill Annexation Area contains suitable habitat for the western spadefoot. Necessary habitat for the western spadefoot includes loss soils for underground burrowing and vernal pools as breeding site. While the CNDDB results did not indicate a known occurrence within five miles of the East Galt Infill Annexation Area, Vernal Pools/Seasonal

Wetlands are considered a model habitat type under the SSHCP. Thus, the proposed project could result in a significant impact to the western spadefoot.

Western Pond Turtle

The northwestern pond turtle is known to occur within a variety of fresh and brackish water habitats including marshes, lakes, ponds, and slow-moving streams. The CNDDB results documented one occurrence within five miles of the East Galt Infill Annexation Area. Due to the presence of suitable habitat within the East Galt Infill Annexation Area and the known occurrence of the species, the project could result in a potentially significant impact to the species.

Western Burrowing Owl

The primary habitat requirement for western burrowing owls is small mammal burrows that the species uses for nesting. Typically, the species uses abandoned ground squirrel burrows, but western burrowing owls have been known to dig burrows in softer soils. In urban areas, western burrowing owls may use pipes, culverts, and piles of material as artificial burrows. Western burrowing owls breed semi-colonially from March through August.

The East Galt Infill Annexation Area, including the Non-Participating Properties and the Simmerhorn Ranch Project Site, is located within the SSHCP-modeled habitat for the burrowing owl. The CNDDB did not present any known occurrences within five miles of the area. Nonetheless, the proposed project could result in the loss of habitat for Western burrowing owl, and, thus, could result in a significant adverse effect.

Cooper's Hawk

Cooper's hawk typically nests and forages in riparian woodland, dense woodland, and other woodlands near water. Cooper's hawk is also known to occur within mixed and evergreen forests, as well as urban landscapes. Although the CNDDB did not list any documented occurrences within the area, the SSHCP-modeled habitat is located throughout the East Galt Infill Annexation Area, including the Non-Participating Properties and the Simmerhorn Ranch Project Site. Thus, the proposed project could result in a potentially significant impact to the species.

Ferruginous Hawk

Ferruginous hawk occurrences within the Central Valley of California typically occur during the non-breeding season (September through March). Winter foraging habitat consist of a variety of open areas including grasslands, agricultural areas, deserts, and savannahs. While documented occurrences of the species do not exist within five miles of the East Galt Infill Annexation Area, suitable habitat for ferruginous hawk exists. SSHCP-modeled habitats for ferruginous hawk within the East Galt Infill Annexation Area include Valley Grassland, Cropland, and ruderal vegetation in the Low-Density Development present within the East Galt Infill Annexation Area. Therefore, the proposed project could result in a significant adverse effect to the species.

Greater Sandhill Crane

Greater sandhill crane is known to nest in northeastern California and in the Central Valley during winters. The SSHCP-modeled habitat for the greater sandhill crane consists of Vernal Pools/Seasonal Wetlands, Valley Grassland, Cropland, and ruderal vegetation in the Low-Density Development areas. Due to the suitable habitat in the area, the species

could occupy the site before development and result in significant adverse effects to the species. Thus, pre-construction surveys and other measures for greater sandhill crane are required.

Loggerhead Shrike

As previously mentioned, the project site is located within the SSHCP-modeled habitat, including small trees and shrubs in open country with short vegetation such as pastures, old orchards. According to the BRA, the species has not been documented in the area; however, the East Galt Infill Annexation Area presents suitable habitat for the species. Thus, the proposed project could result in a potentially significant impact to loggerhead shrike.

Merlin

Merlin is a falcon that is known to occur in Canada and Alaska, as well as California as a migrant and during the non-breeding season. Foraging habitat in the winter includes open forests, grasslands, and tidal flats. Merlin do not typically nest in the area; however, the species may forage within grassland and woodland areas in the East Galt Infill Annexation Area. Thus, the proposed project could result in significant adverse effects to merlin.

Northern Harrier

The northern harrier is known to be a ground nesting species, typically found in wetland/marsh, open grasslands, and savanaugh communities with dense vegetation. In addition, the species often forages in open environments such as marshes, agricultural fields, and grasslands. While the CNDDB results did not list any known occurrences, the East Galt Infill Annexation Area is composed of modeled-habit for the species covered under the SSHCP. Thus, the proposed project could result in a potentially significant impact to northern harrier.

Song Sparrow "Modesto" Population

Song sparrows are known to occur in the Central Valley from Colusa County south to Stanislaus county, and east of the Suisun Marshes. Suitable nesting habitat for song sparrows include riparian thickets and freshwater marsh communities, with nesting occurring from April through June. According to the BRA prepared for the Simmerhorn Ranch Project Site, one documented occurrence is listed within five miles of the site. Given the similarity between the Non-Participating Properties and the Simmerhorn Ranch Project Site, the species could occur within the annexation. Therefore, the proposed project and any future development could result in significant adverse effects to the species.

Swainson's Hawk

According to the Memorandum and the BRA, the project site is modeled as high-value foraging habitat with a nesting occurrence adjacent to the project site. The site contains a few trees within the center of the site and trees adjacent to the site that present suitable nesting habitat for the Swainson's. The agricultural fields located throughout the East Galt Infill Annexation Area are also considered suitable foraging habitat for the species.

Given that the site presents suitable nesting and foraging habitat for the Swainson's hawk, development within the East Galt Infill Annexation Area could result in a significant adverse impact to the species. Pre-construction surveys and avoidance measures for Swainson's hawk are required by the SSHCP.

Tricolored Blackbird

The East Galt Infill Annexation Area, including the Non-Participating Properties and the Simmerhorn Ranch Project Site, contains suitable foraging and nesting-foraging habitat for the tricolored blackbird, including dense blackberry bushes and other dense vegetation along Dry Creek. The agricultural fields could also present suitable nesting habitat for the species, depending on the typed of crop planted. Should development occur within the East Galt Infill Annexation Area at any time, construction and grading would result in habitat loss and a potentially significant impact to the tricolored blackbird.

White-Tailed Kite

While known occurrences of the white-tailed kite have not been documented in the project vicinity, the East Galt Infill Annexation Area presents suitable nesting and foraging habitat for the species. Furthermore, the East Galt Infill Annexation Area includes SSHCP-modeled habitat for white-tailed kite. Thus, the proposed project could have a significant adverse effect on the species.

American Badger

The presence of agricultural land on the project site presents suitable habitat for American badger. In addition, the agricultural lands of the site support California ground squirrels, which provide a prey base for the species. Thus, in the event that such species occur on-site, ground-disturbing activities could result in an adverse effect to American badger.

Nesting Raptors and Migratory Birds

The East Galt Infill Annexation Area contains existing trees that could be used by raptors and migratory birds protected by the MBTA for nesting. Such trees would be removed as part of the proposed project. Construction activities that adversely affect the nesting success of raptors and migratory birds (i.e., lead to the abandonment of active nests) or result in mortality of individual birds constitute a violation of State and federal laws. Thus, in the event that such species occur on-site during the breeding season, the proposed project could result in an adverse effect to species protected under the MBTA.

Western Red Bat and Other Special-Status Bats

Although the CNDDB results did not list any occurrences of the western red bat or other special-status bats, structures could be a suitable roosting habitat for any bats. Furthermore, the East Galt Infill Annexation Area, including the Non-Participating Properties and the Simmerhorn Ranch Project Site, consists of roosting habitat suitable for the western red bat and other special-status bats. Although the CNDDB results included in the BRA do not show signs of bat occurrences, bat species could roost in nearby trees and, thus, result in a potential adverse impact.

Non-Participating Properties

As noted above, approximately 22 of the 34 special-status wildlife within the Non-Participating Properties have the potential to occur. This includes the giant garter snake which has the potential to occur within the Non-Participating Properties but is not likely to occur within the Simmerhorn Ranch Project Site. Furthermore, future development within the proposed project could result in significant adverse effects on the special status plant species listed above, should development occur.

Simmerhorn Ranch

Although many of the species listed above have not been documented within the Simmerhorn Ranch Project Site, the site is composed of SSHCP-modeled habitat for the covered species and suitable habitat for other special-status species. Grading and construction activities within the project site could result in the destruction of habitat or other significant adverse effects to the aforementioned species. In addition, the Simmerhorn Ranch Project Site presents suitable habitat for SSHCP-covered plant species and nine additional special-status plant species. Therefore, preconstruction surveys and avoidance measures would be required in order to ensure that special-status species are not impacted as result of the propose project.

Demolition of the Dairy Complex Structures

As noted previously in this IS/MND, the dairy complex structures that were previously located within the Simmerhorn Ranch Project Site were demolished in early 2020 with approval from Sacramento County. The demolition approval was conducted without discretionary actions from the City of Galt, and granting of the demolition permit was outside of the City of Galt's jurisdiction.

Prior to demolition of the dairy complex structures, ECORP conducted a pre-demolition clearance survey for nesting birds and roosting bats on January 14, 2020.[12] The survey of the project site failed to identify any evidence of actively nesting birds or roosting bats within the structures to be demolished. Nevertheless, ECORP recommended four precautionary measures to allow any roosting birds or bats to vacate the structures prior to demolition. The recommendations included the following actions:

1. Use an excavator or large equipment to knock on the side of the building to be demolished to allow a moment for bats or any other animals that may be inhabiting the structures to vacate;
2. Remove a small section of roof material (when feasible);
3. Use the excavator to knock on the side of the building again and allow a moment for any bats (or other animals) to vacate; and
4. Stay out of flagged wetland areas.

The project applicant indicated that all recommendations would be implemented during the demolition activities. Consequently, demolition of the dairy complex structures, although conducted outside of the proposed project, were not anticipated to result in impacts to special-status species.

Conclusion

Based on the above, development of the Simmerhorn Ranch Project Site and future development of the Non-Participating Properties could potentially result in adverse effects to special-status plants, special-status invertebrates, California tiger salamander, western spadefoot, northwestern pond turtle, western burrowing owl, Cooper's hawk, ferruginous hawk, greater sandhill crane, loggerhead shrike, merlin, northern harrier, song sparrow "Modesto" population, Swainson's hawk, tricolored blackbird, white-tailed kite, American badger, western red bat, special-status bats, or nesting raptors and migratory birds protected by the MBTA. Thus, the proposed project could have an adverse effect, either directly or through habitat modifications, on species identified as special-status species in

[12] ECORP Consulting, Inc. *Bird and Bat Pre-Demolition Clearance Survey – Simmerhorn Ranch Development Project, Sacramento County, California*. January 14, 2020.

local or regional plans, policies, or regulations, or by the CDFW or the USFWS, and a ***potentially significant*** impact could result.

Mitigation Measure(s)

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

Non-Participating Properties

Prepare Biological Resources Assessment and Preliminary Wetland Assessment

IV-1. *If a proposed development within the Annexation Area includes undisturbed areas or is adjacent to undisturbed areas, a Biological Resources Assessment (BRA) shall be prepared to determine the potential biological sensitivities associated with the development. The BRA shall include (but not be limited to) the following:*

- *A review of existing biological information in the region and any documentation specific to the area (i.e., aerial photography and any documentation of projects in the vicinity of the site),*
- *A query of the CDFW CNDDB, USFWS Species List, and CNPS Inventory of Rare and Endangered Plants for potentially occurring special-status species in the vicinity of the project site,*
- *A reconnaissance pedestrian field survey to verify mapped SSHCP terrestrial and aquatic land cover types*
- *A reconnaissance pedestrian field survey to assess the onsite biological resources/constraints, including a delineation of aquatic resources,*
- *A summary of the findings including data on special-status species, jurisdictional waters of the U.S., sensitive natural communities, and wildlife habitat movement corridors,*

Obtain an SSHCP Permit

IV-2. *Before the approval of grading and improvement plans and before any groundbreaking activity associated with the project, the Project applicants shall ensure that authorization pursuant to SSHCP will be obtained. To obtain such authorization, the SSHCP Permit Application shall include the following components as identified in Chapter 10, Section 10.4.2 of the SSHCP:*

- *Applicant Information;*
- *Project Description and Map;*
- *Land Cover Type Map;*
- *Wetland Delineation Map;*
- *Modeled Species Habitat Map;*
- *Description of How the Development Complies with the SSHCP Avoidance and Minimization Measures outlined in Chapter 5, Section 5.4 of the SSHCP;*
- *Proposed Mitigation; and*

- *Results of Covered Species (special-status species) Pre-Construction Surveys.*

Non-Participating Properties/Simmerhorn Ranch Site

Special-Status Plants

IV-3(a). *If a Covered Activity project site contains modeled habitat for Ahart's dwarf rush (Juncus leiospermus var. ahartii), Bogg's Lake hedge-hyssop (Gratiola heterosepala), dwarf downingia (Downingia pusilla), legenere (Legenere limosa), pincushion navarretia (Navarretia myersii), or Sanford's arrowhead (Sagittaria sanfordii), the Covered Activity project site shall be surveyed for the rare plant by an approved biologist and following the California Department of Fish and Wildlife (CDFW) rare plant survey protocols (CDFG 2009) or the most recent CDFW rare plant survey protocols. An approved biologist shall conduct the field surveys and shalll identify and map plant species occurrences according to the protocols. See Chapter 10 for the process to submit survey information to the Plan Permittee and the Permitting Agencies." (SSHCP 2018). If rare plants are not found during surveys, the remainder of the mitigation measures for plants are not necessary.*

IV-3(b). *If a rare plant listed in Mitigation Measure IV-3(a) is detected within an area proposed to be disturbed by a Covered Activity or is detected within 250 feet of the area proposed to be disturbed by a Covered Activity, the Implementing Entity shall assure one unprotected occurrence of the species is protected within a SSHCP Preserve before any ground disturbance occurs on the project site. (SSHCP 2018).*

Invertebrates

IV-4. *There are no species-specific SSHCP AMMs for vernal pool fairy shrimp (Branchinecta lynchi), midvalley fairy shrimp (Branchinecta mesovallensis), Valley Elderberry Longhorn Beetle (Desmocerus californicus dimorphus), Ricksecker's water scavenger beetle (Hydrochara ricksecker), and vernal pool tadpole shrimp (Lepidurus packardi). However, these are Covered Species, and the Project applicants shall comply with SSHCP requirements, In-Lieu Fee Program, and relevant general AMMs.*

California Tiger Salamander

IV-5. *If a development project in the Annexation Area contains Modeled Covered Species Habitat for California Tiger Salamander (Ambystoma californiense), the Project Proponent shall comply with SSHCP AMMs CTS-1 (California Tiger Salamander Daily Construction Schedule), CTS-2 (California Tiger Salamander Exclusion Fencing), CTS-3 (California Tiger Salamander Monitoring), CTS-4 (Avoid California Tiger Salamander Entrapment), CTS-5 (California Tiger Salamander Encounter Protocol), CTS-6 (Erosion Control Materials in California Tiger Salamander Habitat), and CTS-7 (Rodent Control).*

Western Spadefoot

IV-6. If a development project in the Annexation Area contains Modeled Covered Species Habitat for Western Spadefoot (Spea hammondii), the Project Proponent shall comply with SSHCP AMMs WS-1(Western Spadefoot Work Window), WS-2 (Western Spadefoot Exclusion Fencing), WS-3 (Western Spadefoot Monitoring), WS-4 (Avoid Western Spadefoot Entrapment), WS-5 (Erosion Control Materials in Western Spadefoot Habitat), and WS-6 (Western Spadefoot Encounter Protocol).

Western Pond Turtle

IV-7. If a development project in the Annexation Area contains Modeled Covered Species Habitat for Western Pond Turtle (Actinemys marmorata), the Project Proponent shall comply with SSHCP AMMs WPT-1 (Western Pond Turtle Survey), WPT-2 (Western Pond Turtle Work Window), WPT-3 (Western Pond Turtle Monitoring), WPT-4 (Western Pond Turtle Habitat Dewatering and Exclusion), WPT-5 (Avoid Western Pond Turtle Entrapment), WPT-6 (Erosion Control Materials in Western Pond Turtle Habitat), WPT-7 (Western Pond Turtle Modeled Habitat Speed Limit), WPT-8 (Western Pond Turtle Encounter Protocol), and WPT-9 (Western Pond Turtle Post-Construction Restoration.

Tricolored Blackbird

IV-8. If a development project in the Annexation Area contains Modeled Covered Species Habitat for Tricolored Blackbird (Agelaius tricolor), the Project Proponent shall comply with SSHCP AMMs TCB- 1(tricolored blackbird surveys) and TCB-2 (tricolored blackbird pre-construction surveys) and based on the results of surveys conducted under those measures, comply with TCB-3 (tricolored blackbird nest buffer), TCB-4 (tricolored blackbird nest buffer monitoring), and TCB-5 (timing of pesticide use and harvest timing on agricultural preserve).

Swainson's Hawk

IV-9. If a development project in the Annexation Area contains Modeled Covered Species Habitat for Swainson's Hawk (Buteo swainsoni), the Project Proponent shall comply with SSHCP AMMs SWHA-1 (Swainson's hawk surveys) and SWHA-2 (Swainson's hawk pre-construction surveys) and based on the results of surveys conducted under those measures, comply with SWHA-3 (Swainson's hawk nest buffer) and SWHA-4 (Swainson's hawk nest buffer monitoring).

Greater Sandhill Crane

IV-10. If a development project in the Annexation Area contains Modeled Covered Species Habitat for Greater Sandhill Crane (Antigone canadensis tabida), the Project Proponent shall comply with SSHCP AMMs GSC-1 (greater sandhill crane surveys) and GSC-2 (greater sandhill crane pre-construction surveys) and based on the results of surveys conducted under those

measures, comply with GSC-3 (greater sandhill crane roosting buffer), GSC-4 (greater sandhill crane visual barrier), and GSC-5 (greater sandhill crane roosting buffer monitoring).

Western Burrowing Owl

IV-11. *If a development project in the Annexation Area contains Modeled Covered Species Habitat for Western Burrowing Owl (Athene cunicularia), the Project Proponent shall comply with SSHCP AMMs WBO-1 (western burrowing owl surveys) and WBO-2 (western burrowing owl pre-construction surveys) and based on the results of surveys conducted under those measures, comply with WBO-3 (burrowing owl avoidance), WBO-4 (burrowing owl construction monitoring), WBO-5 (burrowing owl passive relocation), WBO-6 (burrowing owl timing of maintenance activities), and WBO-7 (rodent control).*

American Badger

IV-12. *There are no species-specific SSHCP AMMs for American badger. However, this is a Covered Species, and the Project applicants shall comply with SSHCP requirements, In-Lieu Fee Program, and relevant AMMs.*

Nesting Raptors and Migratory Birds including Loggerhead Shrike, Merlin, Northern Harrier, Song Sparrow "Modesto" Population, and White-Tailed Kite

IV-13(a). *The project applicants shall comply with SSHCP AMMs RAPTOR-1 (raptor surveys) and RAPTOR-2 (raptor pre-construction surveys), and based on the results of surveys conducted under those measures, comply with RAPTOR-3 (raptor nest/roost buffer), and RAPTOR-4 (raptor nest/roost buffer monitoring.*

IV-13(b). *A qualified biologist shall conduct a preconstruction nesting bird survey (can be conducted concurrently with IV-14) of all areas associated with construction activities, and a 100-foot buffer around these areas, within 14 days prior to commencement of construction if construction occurs during the nesting season (February 1 through August 31). These surveys can be conducted concurrently with surveys required under IV-14. If active nests are found, a no-disturbance buffer around the nest shall be established. The buffer distance shall be established by a qualified biologist in consultation with the CDFW. The buffer shall be maintained until the fledglings are capable of flight and become independent of the nest, to be determined by a qualified biologist. Once the young are independent of the nest, no further measures are necessary.*

Western Red Bat and Other Special-Status Bats

IV-14. *The project applicants shall comply with SSHCP AMM BAT-1 (winter hibernaculum surveys), and based on the results of the survey conducted, comply with BAT-2 (winter hibernaculum pre-construction surveys), BAT-3 (winter hibernaculum buffer), and BAT-4 (bat eviction methods).*

b,c. **Non-Participating Properties**

An assessment of potentially jurisdictional waters of the U.S. or wetlands on the Non-Participating Properties was performed by ECORP Per the Memorandum, the SSHCP land cover types include riparian habitat associated with Canyon Creek Park, which is located in the northwest corner of the Non-Participating Properties. Although development within the Non-Participating Properties is not proposed at this time, development within the area could result in potential adverse effects to riparian habitat if present at the time. In addition, waters of the U.S are also present within the Non-Participating Properties and could be adversely affected, should development occur in the future.

Simmerhorn Ranch

According to the BRA, the Simmerhorn Ranch Project Site does not contain sensitive natural communities, including wetlands. However, per the BRA, the Simmerhorn Ranch Project Site contains approximately 1.64 acres of potential jurisdictional waters of the U.S. that would be filled with development of the proposed project. The project applicant would be required to apply for the Clean Water Act (CWA) Section 404 and 401 authorization under the SSHCP Aquatic Resource Program. The project applicant would also be required to pay all necessary in-lieu fees to mitigate potential impacts to jurisdictional waters.

Conclusion

As discussed above, the development within the Simmerhorn Ranch Project Site could potentially result in the loss of jurisdictional wetlands. Furthermore, any development within the Non-Participating Properties could also result in substantial adverse effects to jurisdictional wetlands or riparian habitat, dependent upon where the development would occur. Therefore, the proposed project could have a substantial adverse effect on riparian habitat, sensitive natural communities, or federally protected wetlands, and a ***potentially significant*** impact would occur.

Mitigation Measure(s)

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

Non-Participating Properties

IV-15. *Implementation of Mitigation Measure IV-1 and IV-2.*

IV-16. *Before the approval of grading and improvement plans and before any groundbreaking for a development project in the Annexation Area, the Project Proponent shall ensure that authorization pursuant to CWA Section 404 from the USACE and CWA Section 401 from the Central Valley Regional Water Quality Control Board (RWQCB) is obtained (i.e., through permitting under the SSHCP ARP). The construction contractor shall adhere to all conditions outlined in the SSHCP ARP. The Project applicants shall ensure that the Project replaces, restores, or enhances on a "no net loss" basis (in accordance with the USACE and the Central Valley RWQCB) the acreage of all wetlands and other waters of the United States/State that would be removed, lost, and/or degraded due to project implementation, either through the SSHCP In-Lieu Fee Program or by other methods agreeable to the USACE, the Central Valley RWQCB, and the*

City, as appropriate, depending on agency jurisdiction, and as determined during the Section 401 and Section 404 permitting processes.

IV-17. *Before the approval of grading and improvement plans and before any groundbreaking for a development project in the Annexation Area, the Project Proponent shall ensure that authorization pursuant to Section 1600-1616 of the California Fish and Game Code (CDFW 1602 Streambed Alteration Agreement) has been obtained (i.e., through direct application to CDFW for a Section 1602 SAA or through participation in the SSHCP). The construction contractor shall adhere to all conditions outlined in the Section 1602 SAA or SSHCP.*

IV-18. *Before any groundbreaking for a development project in the Annexation Area, the Project Proponent shall comply with SSHCP AMMs BMP-1 through BMP-11.*

IV-19. *Before the approval of grading and improvement plans and before any groundbreaking for a development project in the Annexation Area, the Project Proponent shall ensure that mitigation for impacts to aquatic features and other habitat for special-status species has been implemented through the SSHCP In-Lieu Fee Program or by other methods agreeable to the USACE, RWQCB, USFWS, CDFW, and the City, as appropriate, depending on agency jurisdiction.*

Simmerhorn Ranch

IV-20. *Implementation of Mitigation Measures IV-16, IV-17, and IV-19.*

d. Non-Participating Properties

According to the Memorandum, limited wildlife movement corridors may occur within the Non-Participating Properties; however, wildlife nursery sites do not currently exist within the area. However, without a site survey, the absence of wildlife movement corridors and nursery sites cannot be confirmed. While development is not proposed within the Non-Participating Properties, any future development within the area could result in impacts to wildlife movement corridors and nursery sites. In addition, development within the East Galt Infill Annexation Area was previously analyzed under the existing General Plan land use designations. Therefore, any impacts to wildlife movement corridors and nursery sites resulting from potential future development would be consistent with the City's General Plan EIR. Nonetheless, should development occur within the Non-Participating Properties, a potentially significant impact could occur.

Simmerhorn Ranch

The Simmerhorn Ranch Project Site contains existing streams and other aquatic features which could support wildlife movement corridors. According to the BRA, the aquatic features do not provide high quality movement corridors due to the lack of significant riparian vegetation and perennial water present. In addition, the Simmerhorn Ranch Project Site does not contain any known nursery sites. As such, the Simmerhorn Ranch project would not result in a significant impact to wildlife movement corridors or nursery sites.

Conclusion

While the Simmerhorn Ranch Project Site is not anticipated to result in a significant impact to wildlife movement corridors, any proposed development within the Non-Participating Properties could result in significant adverse effects to wildlife movement corridors. As such, the project could interfere with the movement of any resident or migratory fish or wildlife species or with established resident or migratory wildlife corridors, or impede the use of wildlife nursery sites, and a ***potentially significant*** impact would occur.

Mitigation Measure(s)

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

Non-Participating Properties

IV-21. Implementation of Mitigation Measures IV-1 and IV-2.

e. Non-Participating Properties

Because development is not proposed within the Non-Participating Properties, the Non-Participating Properties have not been subject to an arborist survey. However, protected oak trees are likely to exist within the Non-Participating Properties. Potential future development within the Non-Participating Properties has been anticipated by the City's General Plan, and potential impacts related to the creation of conflicts local policies or ordinances protecting biological resources have been addressed in the City's General Plan EIR. Moreover, any future development within the Non-Participating Properties would be required to comply with Section 18.52.060, Cutting and Removal of Heritage Oak Trees, of the Galt Municipal Code as the section relates to tree removal. Should development of the Non-Participating Properties occur without compliance with Section 18.52.060 of the City's Municipal Code, a potentially significant impact could occur.

Simmerhorn Ranch

Sierra Nevada Arborists prepared an *Arborist Report and Tree Inventory Summary* for the Simmerhorn Ranch Project site.[13] As part of preparation of the Arborist Report, all trees within and/or overhanging the project site were visually evaluated. Individual trees were numbered and the overall structural condition and vigor of each tree was assessed. In summary, a total of 36 trees measuring four inches or more in diameter at breast height were identified. Of the 36 total on-site trees, 13 Coast Live Oak, and 14 Valley Oak trees were identified as protected trees under Section 18.52.060 of the City's Municipal Code. One of the protected Valley Oak trees, as well as two other non-protected species were recommended for removal due to the nature and extent of defects, compromised health, and/or structural instability noted by the arborist. Although the arborist has identified the foregoing three trees for removal, Arborist Report did not provide a detailed review of the project site plans to determine other on-site trees that may require removal in order to accommodate the proposed project. Consequently, implementation of the Simmerhorn Ranch Project could require removal of additional protected trees. Section 18.52.060 of the Galt Municipal Code requires a tree permit for removal of any heritage oak trees. In the event that the Simmerhorn Ranch Project does not comply with the requirements within Section 18.52.060 of the City's Municipal Code, then significant adverse effects could occur.

[13] Sierra Nevada Arborist. *Arborist Report and Tree Inventory Summary*. November 5, 2019.

Conclusion

Considering the above, the proposed project could conflict with the City of Galt Tree Ordinance, and a ***potentially significant*** impact would occur related to conflicting with local policies or ordinances protecting biological resources.

Mitigation Measure(s)

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

Non-Participating Properties/Simmerhorn Ranch

IV-22. *A tree removal permit shall be procured from the City for removal of any heritage oak trees and the project proponent shall provide appropriate mitigation as required by the tree removal permit. Mitigation may include payment into the City's Tree Preservation Fund.*

f. Non-Participating Properties/Simmerhorn Ranch

Both the Non-Participating Properties and the Simmerhorn Ranch Project Site are located within the boundaries of the SSHCP, which establishes an effective framework to protect natural resources in south Sacramento County, while improving and streamlining the environmental permitting process for impacts on endangered species and provides guidance for the mitigation of impacts to covered species. Applicable Avoidance and Minimization Measures for SSHCP covered species known to occur within the project region, have been included in Mitigation Measures IV-1 through IV-22 of this IS/MND. Additionally, the proposed project would be subject to pay all applicable development fees according to the sites land cover types. It should be noted that if a development application is submitted for the Non-Participating Properties, implementation of the mitigation measures within this section would be required to ensure consistency with the SSHCP.

Therefore, the proposed project would not conflict with the applicable provisions of the SSHCP and a ***less-than-significant*** impact would occur related to conflicts with an adopted HCP, NCCP, or other approved local, regional, or State HCP.

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

Discussion

The following is based primarily on a Cultural Resources Inventory and Evaluation Report (Cultural Report)[14] and a Cultural Resources Literature Review (Literature Review)[15] prepared for the proposed project by ECORP. The Cultural Report focused specifically on the Simmerhorn Ranch Project Site, while the Literature Review included information related to the entire East Galt Infill Annexation Area.

a. As part of the Literature Review prepared by ECORP, a cultural resources records search was conducted at the North Coast Information Center (NCIC) of the California Historical Resources Information Center (CHRIS). In addition to the records search, other literature reviewed included survey reports, archaeological site records, historic maps, and listings of resources on the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), Historic Property Data File for Sacramento County, California Points of Historical Interest, California Historical Landmarks, and National Historic Landmarks. The Literature Review concluded that at least 45 historic-period structures are located within the vicinity of the East Galt Infill Annexation Area. The Cultural Report was prepared to evaluate the potentially historic resources discovered or recorded within the Simmerhorn Ranch Project Site.

In addition to the CHRIS records search, ECORP conducted further literature reviews for relevant survey reports, historic maps, and historic data from several public agencies. To augment the review of documentation, pedestrian surveys were conducted on October 3, 4, and 5, 2018 and April 17, 2019. The pedestrian surveys were conducted using 15-meter transects and were conducted within the Simmerhorn Ranch Project Site.

In order to determine whether the resources found within the Simmerhorn Ranch Project Site are historically significant, ECORP evaluated the resources using the NRHP and CRHR eligibility criteria.

The NRHR and CRHR eligibility criteria include the following:

(1)/(A) It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the U.S.;
(2)/(B) It is associated with the lives of persons important to local, California, or national history;

[14] ECORP Consulting, Inc. *Cultural Resources Inventory and Evaluation Report.* April 18, 2019.
[15] ECORP Consulting, Inc. *RE: Cultural Resources Records Search Literature Review for the Galt East Infill Annexation Area, Sacramento County, California – T 5 North, R 6 East, Sections 23 and 26 (ECORP) Project No 2018-180.* May 24, 2019.

(3)/C) It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values; or

(4)/D) It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

In addition, the resource must retain integrity. Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association. The resource must be at least 50 years old, except in exceptional circumstances.

Non-Participating Properties

Because plans for development of the Non-Participating Properties do not currently exist, the Non-Participating Properties were not subject to intensive field survey, but instead were evaluated based on available literature. As discussed in the Literature Review, a historic map review indicated that 45-historic period structures exist within the entire East Galt Infill Annexation Area, which includes both the Non-Participating Properties and the Simmerhorn Ranch Project Site. Furthermore, because field surveys were not conducted within the Non-Participating Properties, the presence or absence of additional historic period or archaeological resources cannot be determined at this time.

Although the proposed project would not include development activities within the Non-Participating Properties, future development within the Non-Participating Properties could occur in accordance with the City's existing General Plan land use designations for the Non-Participating Properties. Such development would be required to comply with the policies contained in the Historic Resources Element of the City's General Plan. For instance, Policy HRE-1.2 encourages the preservation of architectural styles, while Policy HRE-1.7 requires that CEQA review "be conducted on demolition permit applications for buildings designated as, or potentially eligible for designation as, historic structures…"[16] Consequently, should future development that would have the potential to impact historic resources be proposed within the Non-Participating Properties, such development would be subject to separate CEQA review. It should be noted that development within the Non-Participating Properties, and potential impacts to historic resources has been previously analyzed in the City's General Plan EIR. According to the City's General Plan EIR, buildout of the City's General Plan would result in significant and unavoidable impacts to historic resources. Accordingly, even with future CEQA review, potential future development within the non-participating could result in impacts as previously analyzed in the City's General Plan EIR.

Considering that development within the Non-Participating Properties is not proposed at this time, CEQA review of potential future development would be required if such development would have the potential to impact historic structures, and that development of the Non-Participating Properties was previously analyzed in the City's General Plan EIR, the proposed project would not have the potential to cause a substantial adverse change in the significance of a historical resource beyond what has been previously anticipated in the City's General Plan EIR.

[16] City of Galt. *2030 Galt General Plan, Policy Document, Final* [pg. HRE-2]. April 2009.

Simmerhorn Ranch

ECORP identified several potential resources within the Simmerhorn Ranch Project Site, some of which extend into portions of the project site containing Non-Participating Properties. In particular, ECORP identified three roadway segments, two irrigation standpipes, and a historic period dairy complex as potentially historic. All such potential resources are discussed in further depth in the following sections.

Roadway Segments

ECORP has evaluated roadway segments both wholly within the Simmerhorn Ranch Project Site as well as segments that extend outside of the Simmerhorn Ranch Project Site into the Non-Participating Properties.

As indicated by ECORP, sections of Simmerhorn Road, Marengo Road, and Boessow Road, both within the Simmerhorn Ranch Project Site and in the Non-Participating Properties, have been previously recorded as potentially historic resources. All three roadway segments consist of two-lane rural roads. Th recorded segment of Simmerhorn Road is 0.8-mile long, approximately 30-feet wide, and first appears on historic maps in 1953. The recorded segment of Marengo Road is 0.5-mile long, approximately 25-feet wide, and first appears on historic maps in 1885. While the recorded segment of Boeessow Road is 0.25-mile long, approximately 30-feet wide, and first appears on historic maps in 1885. All three road segments are currently paved, in use, and maintained.

According to ECORP, the archival research indicates that the roadway was named after the Marengo Ranch Complex; however, very little information exists about the products of the ranch other than general farming and stock raising. Ranching was common in the project area during the late 1800s and early 1900s, and the use of roads was common. Archival research did not indicate that Marengo Road, Simmerhorn Road, or Boessow Road are associated with a significant historical event, nor are the roads important within the contexts of ranching, agriculture or road development in Galt. Consequently, the roads are not eligible under criteria 1/A.

With regard to Marengo Road, the archival research indicates that the roadway was named after the Marengo Ranch Complex; however, very little information exists about the products of the ranch other than general farming and stock raising. Although members of the Marengo family were found to be active members of the early community within Sacramento County, ECORP did not discover documentation supporting a finding that the Marengo family gained historic significance in the context of Sacramento County history. Therefore, Marengo Road does not demonstrate an association with the lives of persons of significant history and is not eligible under criterion 2/B.

Similarly, ECORP did not identify any connections between Simmerhorn Road and Boessow Road with persons or groups with a significant contribution to the history of Galt or Sacramento County. Therefore, neither Simmerhorn Road nor Boessow Road are eligible under criterion 2/B.

All three of the roadways follow the same historical alignment as when they were originally constructed. Due to the continued use of each road way, all three roadways have undergone decades of maintenance, repairs, and upgrades for modern usage. As a result, the roadways do not embody any distinctive characteristics of a type, period, or method of roadway construction aside from modern maintained rural roads. The roadways are not

uniquely artistic or designed with any distinctive engineering characteristics. Thus, the roadways are not eligible under criteria 3/C.

The information potential in historic roads lies in the alignment and route of each roadway. The alignment and route of the roads in question were recorded relatively accurately in historical topographic maps and, thus, the information regarding their historical route is provided in the archival record. Furthermore, the roads do not possess the potential for subsurface archaeological deposits, and, accordingly, were not tested for such deposits. According to ECORP, the roads do not possess the potential to yield any additional information regarding the relationship or functionality of roads or provide any information that is not already represented in the archival record. Therefore, the roads are not eligible under criteria 4/D.

Because the roadways do not meet the criteria for listing under the NRHR and/or the CRHR, any changes to the roadways occurring during implementation of the Simmerhorn Ranch Project, including off-site project work, would not result in adverse change in historic resources.

Irrigation Standpipes

Two irrigation standpipes were identified within the project site. ECORP determined that concrete standpipes, such as those found within the project site, are common features within the central valley, and, although the pipes are related to twentieth century agriculture, ECORP determined that the pipes do not hold any significance within that context. Similarly, the standpipes cannot be associated with any persons or groups of people who made a significant contribution to history. As such, the resources are not eligible under NRHP Criterion A and B or CRHR Criterion 1 and 2. In addition, the function and components of the pipes are well known, which means the system ultimately does not include any subsurface archaeological deposits that may yields important information. With regards to the design of the standpipes, the pipes do not retain integrity of feeling or setting, as they are adjacent to a modern road and do not convey the aesthetic sense of a particular historic time period. Therefore, the underground irrigation standpipes are not eligible under NRHP Criterion C and D or CRHR Criterion 3 and 4. Accordingly, the standpipes are not eligible for listing under the NRHP or CRHR and removal of the standpipes with implementation of the Simmerhorn Ranch project would not constitute an impact to historic resources,

Dairy Complex

As noted in Section F of this IS/MND, the Simmerhorn Ranch Project Site previously contained an abandoned dairy complex. During preparation of this environmental analysis, the project applicant was granted a demolition permit for the dairy complex by the County of Sacramento. Because the Simmerhorn Ranch Project Site is currently outside of the City limits of the Galt, Sacramento County had sole discretion over the approval of the demolition permit, and the City of Galt did not take any action regarding the demolition of the dairy complex. Prior to demolition of the dairy complex, ECORP conducted an historic resource assessment of the Dairy Complex. The results of ECORPs' assessment are discussed below.

The dairy complex consisted of historic-period and modern elements. The historic-period elements included an abandoned dairy barn and adjacent holding pen, an abandoned open-air barn, a house, a large cement foundation, a water pump, and several

deteriorating wooden and metal fences, all dating to approximately 1957. Modern elements included large cattle holding areas, poured concrete and metal troughs, corrugated metal awnings over feeding areas for shade, and two trailers.

The dairy complex was developed in the 1950s for agricultural purposes; the majority of agricultural development in the area of the City of Galt occurred between 1869 and 1920. Therefore, the dairy complex did not contribute to the historical importance or possess significant association within the context of local agricultural development or dairying in the City of Galt, Sacramento County, or the region. Furthermore, the dairy complex was not associated with any significant local context or statewide or national trend in agricultural development and was not associated with other locally significant agricultural or dairy operations. The complex was not associated with any existing historic district. Consequently, the dairy complex was not eligible under criteria A/1.

Property owners of the dairy complex changed multiple times throughout the existence of the dairy complex, but none of the past owners were considered historically significant individuals. Consequently, the dairy complex and individual buildings and structures are not associated with the lives of persons significant in the past and are not eligible under criteria B/2.

The residential structure demonstrated aspects of both the Minimal and Ranch styles of architecture. However, ECORP determined that the residence did not contain many of the important character-defining design features of either architectural style, and the residence did not represent a good example of either architectural style in the context of Galt or Sacramento County. The residence was built and designed by unknown individuals and the structure was not distinct or notable compared to other structures built during the 1950s. The utility buildings, including the barns and ranching structures such as the corral and fences, were common agricultural structures and did not embody any distinctiveness from an architectural or historical perspective. Thus, the dairy complex structures did not embody distinctive characteristics of a type, period or method of construction, or represent the work of a master, or possess high artistic values, or possess any significant distinguishable components either individually or as part of a district, and are ineligible under criteria C/3.

ECORP performed subsurface testing within the Simmerhorn Ranch Project Site prior to demolition of the structures. The subsurface testing did not yield any artifacts. The dairy complex did not meet the data thresholds to address research questions outlined in the research design, and does not contain data considered important to history. As such, the dairy complex is not eligible under criteria D/4.

Although the dairy complex retained integrity of location, setting, and association, the disrepair of the structures, integrity of materials, workmanship, and design diminished the integrity of all structures.

Regardless of the integrity of the location, setting, and association, ECORP determined that the dairy complex did not meet any criteria for listing as a historic resource under the NRHP and the CRHR, and demolition of the structures did not result in adverse impacts to historic resources.

Historic Resources within Simmerhorn Ranch Site

Based on the above, the resources found within the Simmerhorn Ranch Project Site would not be considered eligible historical resources for the NRHP or CRHR. As such, development within the Simmerhorn Ranch Project Site would not be expected to result in a significant impact to any historical resources.

Conclusion

As described above, ECORP evaluated all potential historic resources within the Simmerhorn Ranch Project Site, including those resources that extend from the Simmerhorn Ranch Project Site onto surrounding properties within the Non-Participating Properties, and determined that all such potential historic resources are ineligible from listing under the NRHP and CRHR. Furthermore, because development is not currently proposed within the Non-Participating Properties, implementation of the proposed project would not directly result in adverse impacts to historic resources within the Non-Participating Properties.

Despite the absence of identified historic resources within the Simmerhorn Ranch Project Site, the possibility remains that implementation of the Simmerhorn Ranch project, including ground-disturbing activity associated with project construction, could result in discovery of previously unknown resources. Furthermore, ECORP did not perform surveys of all Non-Participating Properties; consequently, potential future development could result in impacts to historic resources if eligible resources exist within the Non-Participating Properties.

Given the above, implementation of the proposed project would result in a ***potentially significant*** impact related to causing a substantial adverse change in the significance of a historical resource pursuant to Section 15064.45.

Mitigation Measure(s)

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

Non-Participating Properties/Simmerhorn Ranch

V-1. *Prior to grading permit issuance, the developer shall submit plans to the Community Development Department for review and approval which indicate (via notation on the improvement plans) that if historic and/or cultural resources are encountered during site grading or other site work, all such work shall be halted immediately within 100 feet and the developer shall immediately notify the Community Development Department of the discovery. In such case, the developer shall be required, at their own expense, to retain the services of a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeologist for the purpose of recording, protecting, or curating the discovery as appropriate. The archaeologist shall be required to submit to the Community Development Department for review and approval a report of the findings and method of curation or protection of the resources. Further grading or site work within the area of discovery shall not be allowed until the preceding work has occurred.*

V-2. *If human remains, or remains that are potentially human, are found during construction, a professional archeologist shall ensure reasonable*

protection measures are taken to protect the discovery from disturbance. The archaeologist shall notify the Sacramento County Coroner (per §7050.5 of the State Health and Safety Code). The provisions of §7050.5 of the California Health and Safety Code, §5097.98 of the California Public Resources Code, and Assembly Bill 2641 will be implemented. If the Coroner determines the remains are Native American and not the result of a crime scene, then the Coroner will notify the Native American Heritage Commission (NAHC), which then will designate a Native American Most Likely Descendant (MLD) for the project (§5097.98 of the Public Resources Code). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the applicant does not agree with the recommendations of the MLD, the NAHC can mediate (§5097.94 of the Public Resources Code). If an agreement is not reached, the qualified archaeologist or most likely descendent must rebury the remains where they will not be further disturbed (§5097.98 of the Public Resources Code). This will 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 the county in which the property is located (AB 2641). Work cannot resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.

b,c. **Non-Participating Properties/Simmerhorn Ranch**

According to the Cultural Report, Dry Creek, located to the south of the East Galt Infill Annexation Area, has experienced deposit of alluvium over time, which could have buried pre-contact archaeological resources. Archaeological sites often occur along, or in proximity to, perennial waterways. Thus, given the site's location to Dry Creek, the potential exists for buried archaeological sites to occur within the East Galt Infill Annexation Area. Furthermore, unknown archaeological resources, including human remains, have the potential to be uncovered during ground-disturbing construction and excavation activities at Simmerhorn Ranch or future development within the Non-Participating Properties. If previously unknown resources are encountered during construction activities, the proposed project could cause a substantial adverse change in the significance of a unique archaeological resource pursuant to CEQA Guidelines Section 15064.5 and/or disturb human remains, including those interred outside of dedicated cemeteries, during construction. Therefore, impacts could be considered ***potentially significant***.

Mitigation Measure(s)

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

Non-Participating Properties/Simmerhorn Ranch

V-3. Implement Mitigation Measures V-1 and V-2.

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

Discussion

a,b. The main forms of available energy supply are electricity, natural gas, and oil. A description of the relevant sections of the 2019 California Building Standards Code (CBSC), with which the proposed project would be required to comply, as well as discussions regarding the proposed project's potential effects related to energy demand during construction and operations is provided below.

California Green Building Standards Code

The 2019 California Green Building Standards Code, otherwise known as the CALGreen Code (CCR Title 24, Part 11), is a portion of the CBSC, which became effective with the rest of the CBSC on January 1, 2020. 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 CALGreen Code include, but are not limited to, the following measures:

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

Building Energy Efficiency Standards

The 2019 Building Energy Efficiency Standards is a portion of the CBSC, which expands upon energy efficiency measures from the 2016 Building Energy Efficiency Standards resulting in a seven percent reduction in energy consumption from the 2016 standards for residential structures and a 30 percent reduction in energy consumption for non-residential structures. Energy reductions relative to previous Building Energy Efficiency Standards are achieved through various regulations including requirements for the use of high

efficacy lighting, improved water heating system efficiency, and high-performance attics and walls.

One of the improvements included within the 2019 Building Energy Efficiency Standards will be the requirement that certain residential developments, including some single-family and low-rise residential developments, include on-site solar energy systems capable of producing 100 percent of the electricity demanded by the residences. Certain residential developments, including developments that are subject to substantial shading, rendering the use of on-site solar photovoltaic systems infeasible, are exempted from the foregoing requirement; however, such developments would continue to be subject to all other applicable portions of the 2019 Building Energy Efficiency Standards.

Non-Participating Properties

Any future development within the Non-Participating Properties would be subject to compliance with the previously mentioned CBSC requirements. Furthermore, development of the Non-Participating Properties under the existing General Plan land use designations was previously analyzed within the City of Galt's General Plan EIR. Because the proposed project would not include development within the Non-Participating Properties and the existing land use designations would remain the same, any potential impacts related to energy resources from potential future development would be consistent with the analysis in the General Plan EIR.

Simmerhorn Ranch

The following sections describe energy use associated with construction and operation of the Simmerhorn Ranch Project Site.

Construction Energy Use

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

The CARB has recently prepared the *2017 Climate Change Scoping Plan Update* (2017 Scoping Plan),[17] which builds upon previous efforts to reduce GHG emissions and is designed to continue to shift the California economy away from dependence on fossil fuels. Appendix B of the 2017 Scoping Plan includes examples of local actions (municipal code changes, zoning changes, policy directions, and mitigation measures) that would support the State's climate goals. The examples provided include, but are not limited to, enforcing idling time restrictions for construction vehicles, utilizing existing grid power for electric energy rather than operating temporary gasoline/diesel-powered generators, and increasing use of electric and renewable fuel-powered construction equipment. The In-Use Off Road regulation described above, with which the proposed project must comply, would be consistent with the intention of the 2017 Scoping Plan and the recommended actions included in Appendix B of the 2017 Scoping Plan.

[17] California Air Resources Board. *The 2017 Climate Change Scoping Plan Update.* January 20, 2017.

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. The proposed project would be required to comply with all applicable regulations related to energy conservation and fuel efficiency, which would help to reduce the temporary increase in demand.

Operational Energy Use

Following implementation of the proposed project, SMUD would provide electricity and PG&E would provide natural gas to the project site. Energy use associated with operation of the proposed project would be typical of residential and school uses, requiring electricity and natural gas for interior and exterior building lighting, heating, ventilation, and air conditioning (HVAC), 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 residential and school development.

The proposed residential project would be subject to all relevant provisions of the most recent update of the CBSC, including the Building Energy Efficiency Standards. Adherence to the most recent CALGreen Code and the Building Energy Efficiency Standards would ensure that the proposed structures would consume energy efficiently through the incorporation of such features as efficient water heating systems, high performance attics and walls, and high efficacy lighting. Required compliance with the CBSC would ensure that the building energy use associated with the proposed project would not be wasteful, inefficient, or unnecessary.

With regard to transportation energy use, the proposed project would comply with all applicable regulations associated with vehicle efficiency and fuel economy. In addition, as discussed in Section XVII, Transportation, of this IS/MND, the City of Galt and surrounding areas provides residents with numerous public transportation options. Transit options include Dial-A-Ride, Highway 99 Express, Delta Route, and other modes of public transit. Transit would provide access to several grocery stores, restaurants, banks, and schools within close proximity to the project site. The site's access to public transit and proximity to such uses would reduce VMT and, consequently, fuel consumption associated with the proposed single-family residences. Furthermore, the project would be designed in order to accommodate several roundabouts and bike lanes meeting the City's standards. Roundabouts reduce vehicle idling at stop signs, which conserves fuel, while the provision of bike lanes would encourage the use of active means of transportation.

Simmerhorn Ranch Energy Use

Considering the anticipated construction-related and operational energy use discussed above for the Simmerhorn Ranch Project, the Simmerhorn Ranch Project would not in wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

Conclusion

As discussed above, neither the potential future development of the Non-Participating Properties nor the proposed development of the Simmerhorn Ranch Project would result in wasteful, inefficient, or unnecessary consumption of energy resources or conflict with

or obstruct a State or local plan for renewable energy or energy efficiency. Thus, a ***less-than-significant*** impact would occur.

VII. GEOLOGY AND SOILS. *Would the project:*	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	✖	☐
ii. Strong seismic ground shaking?	☐	☐	✖	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	✖	☐
iv. Landslides?	☐	☐	✖	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	✖	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	✖	☐
d. Be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	✖	☐	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	✖
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	✖	☐	☐

Discussion

ai-ii. **Non-Participating Properties/Simmerhorn Ranch**

The City of Galt's topography is relatively flat and Galt is not located within an Alquist-Priolo Earthquake Fault Zone nor is the City in the immediate vicinity of an active fault.[18] The nearest mapped fault to the East Galt Infill Annexation Area is the Midland Fault and the nearest active fault is the Clayton-Marsh Creek-Greenville Fault, which is located over 40 miles southwest of the East Galt Infill Annexation Area. According to the Galt 2030 General Plan EIR, ground shaking hazards are considered to be low.[19] The City of Galt is located in Seismic Risk Zone 3, and, although the potential for earthquakes is low within Zone 3, the possibility for damage could still occur.

Damage on the project site would be likely to occur in the event of a major earthquake from ground shaking and seismically-related ground failure. However, Policy SS-1.7 of the Galt 2030 General Plan requires all new buildings to be built according to seismic requirements of the California Building Standards Code (CBSC).[20] All residences and structures within the East Galt Infill Annexation Area would be constructed in accordance with the applicable state-of-the-art seismic requirements. Framed construction on proper foundations constructed in accordance with Uniform Building Code and CBSC

[18] California Department of Conservation. *Fault Activity Map of California*. Available at: http://maps.conservation.ca.gov/cgs/fam/. Accessed November 4, 2019.
[19] City of Galt. *City of Galt 2030 General Plan EIR*. [pg. 8-24]. April 2009.
[20] City of Galt. *City of Galt General Plan Policy Document*. [pg. SS-2]. April 2009.

requirements are generally flexible enough to sustain minor structural damage from ground shaking without risk of collapse.

Given that development is not currently proposed within the Non-Participating Properties as part of the project, all existing uses outside of the Simmerhorn Ranch Project Site would be retained. Any future development within the Non-Participating Properties would be subject to compliance with the CBSC. In addition, development of the East Galt Infill Annexation Area under the existing General Plan land use designations was previously analyzed within the City of Galt's General Plan EIR. Although the Simmerhorn Ranch Project would include amendments to the General Plan, the amendments would result in changes to the location of proposed uses, not changes to the type of uses that would be developed within the site. Consequently, the Simmerhorn Ranch Project would not result in increased risk related to seismic hazards beyond the level that has been previously analyzed in the City of Galt's General Plan EIR. Considering that the proposed project would not result in the alteration of existing land use designations for any of the Non-Participating Properties, any potential impacts from seismic ground shaking would be consistent with the analysis presented in the General Plan EIR. Therefore, people and structures would not be exposed to potential substantial adverse effects involving strong seismic ground shaking or failure, and a ***less-than-significant*** impact would occur.

aiii,aiv,

c. **Non-Participating Properties/Simmerhorn Ranch**

The City of Galt's General Plan EIR concluded that the City of Galt SOI is considered to be at a low to moderate risk of hazard from liquefaction and subsidence. Due to the relatively flat topography of the City of Galt SOI, the City of Galt's General Plan EIR did not consider landslide to be a risk to new or existing development within the City. Consequently, existing or future development within the East Galt Infill Annexation Area would not be subject to risk from landslides, either seismically induced or otherwise.

Liquefaction

Liquefaction is a phenomenon in which granular material is transformed from a solid state to a liquefied state as a consequence of increased pore-water pressure and reduced effective stress. Increased pore-water pressure is induced by the tendency of granular materials to densify when subjected to cyclic shear stresses associated with earthquakes. Per the California Geologic Survey, the Simmerhorn Ranch Project Site is not located within a designated seismic hazard zone for liquefaction.[21] The nearest liquefaction zone is located approximately 20 miles southwest of the East Galt Infill Annexation Area. According to the United States Department of Agriculture's Web Soil Survey, the project site is underlain by San Joaquin silt loam. Silt loams do not represent the type of unconsolidated that is typically subject to liquefaction. Furthermore, per Policy SS-2.1 of the City of Galt's General Plan, development within the East Galt Infill Annexation Area, including the Simmerhorn Ranch Project as well as any potential future development within the Non-Participating Properties may be required to prepare a soils report to determine whether permitting requirements should be placed on the project to avoid impacts related to liquefaction. Due to the low-likelihood that development within the East Galt Infill Annexation Area would be subject to risks from liquefaction, implementation of the proposed project would not result in risks related to liquefaction, either seismically induced or otherwise.

[21] California Geologic Survey. *Data Viewer.* Available at: https://maps.conservation.ca.gov/geologichazards/#dataviewer. Accessed February 2020.

Lateral Spreading

Lateral spreading is horizontal/lateral ground movement of relatively flat-lying soil deposits towards a free face such as an excavation, channel, or open body of water; typically, lateral spreading is associated with liquefaction of one or more subsurface layers near the bottom of the exposed slope. The East Galt Infill Annexation Area does not contain any open faces that would be considered susceptible to lateral spreading. In addition, as noted above, the development within the East Galt Infill Annexation Area is not anticipated to be subject to substantial liquefaction hazards. Therefore, the potential for lateral spreading to pose a risk to the proposed Simmerhorn Ranch development or any potential future development in the Non-Participating Properties is relatively low.

Subsidence/Settlement

Subsidence is the settlement of soils of very low density generally from either oxidation of organic material, or desiccation and shrinkage, or both, following drainage. Subsidence takes place gradually, usually over a period of several years. The General Plan EIR determined that the probability of subsidence occurring in the study area is considered a low to moderate hazard. Given that the proposed project would comply with General Plan Policy SS-1.7, requiring new buildings be built in accordance with the CBSC, and Policy SS-2.1 the potential for subsidence to pose a risk to the proposed development is relatively low.

Conclusion

Based on the above, the proposed project would not be subject to substantial risks related to liquefaction, landslides, lateral spreading, and subsidence/settlement. Compliance with standard construction regulations included in the CBSC would ensure that the proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving liquefaction, subsidence, or settlement, and would not 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 subsidence, liquefaction, or collapse. Thus, a ***less-than-significant*** impact would occur.

b. **Non-Participating Properties/Simmerhorn Ranch**

Issues related to erosion and degradation of water quality during construction are discussed in Section X, Hydrology and Water Quality, of this IS/MND, under question 'a'. As noted therein, the proposed project would not result in substantial soil erosion or the loss of topsoil. Thus, a ***less-than-significant*** impact would occur.

d. **Non-Participating Properties/Simmerhorn Ranch**

Expansive soils can undergo significant volume change with changes in moisture content. Specifically, such soils shrink and harden when dried and expand and soften when wetted. If structures are underlain by expansive soils, foundation systems must be capable of tolerating or resisting any potentially damaging soil movements, and building foundation areas must be properly drained. Per the City's General Plan EIR, expansive soils located within the City have been mixed with more granular soils during site excavation or buried beneath more granular soils during excavation operations to reduce the soil's overall expansiveness.[22] However, the potential still exists that expansive soils are located within the East Galt Infill Annexation Area and pose a risk to any future development within the area.

[22] City of Galt. *Galt General Plan Update 2030: Environmental Impact Report.* [pg. 10-17] July 2008.

Therefore, a ***potentially significant*** impact could occur related to being located on expansive soil, as defined in Table 18-1B of the Uniform Building Code, thereby creating substantial direct or indirect risks to life or property.

Mitigation Measure(s)

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

Non-Participating Properties/Simmerhorn Ranch

VII-1. *Prior to issuance of a grading permit, the applicant/developer shall incorporate the recommendations of a design-level geotechnical report into project Improvement Plans for review and approval by the City Engineer. Should expansive or otherwise unstable soils be found within the project site, the design-level geotechnical report shall include measures necessary to ensure that such on-site conditions are fully mitigated. Methods of mitigating potential on-site soil expansive soils may include, but shall not be limited to, the following measures:*

- *Remove and replace potentially expansive soils; and/or*
- *Strengthen foundations (e.g., post-tensioned slab, reinforced mat or grid foundation, or other similar system) to resist excessive differential settlement associated with seismically-induced soil expansion.*

e. **Non-Participating Properties/Simmerhorn Ranch**

The proposed project would connect to existing City sewer services. Thus, the construction or operation of septic tanks or other alternative wastewater disposal systems is not included as part of the project. Therefore, ***no impact*** regarding the capability of soil to adequately support the use of septic tanks or alternative wastewater disposal systems would occur.

f. **Non-Participating Properties/Simmerhorn Ranch**

The City's General Plan indicates that known paleontological resources could exist along the major waterways, especially the Cosumnes River, and along the Dry Creek corridor. However, development allowed under the General Plan could result in the discovery and disturbance of previously unknown or undiscovered paleontological resources. The City's General Plan EIR concluded that with implementation of Policy HRE-4.1 through HRE-4.4, which requires all new development projects to comply with procedures upon discovery of unique paleontological resources, impacts related to disturbance of paleontological resources would be less than significant.

In addition, the City's General Plan does not note the existence of any unique geologic features within the City. Consequently, implementation of the proposed project would not be anticipated to have the potential to result in direct or indirect destruction of unique geologic features.

Although the proposed project would not have the potential to result in the destruction of unique geologic features, previously unknown paleontological resources could exist within the East Galt Infill Annexation Area. Thus, ground-disturbing activity, such as grading, trenching, or excavating associated with implementation of the proposed project, could have the potential to disturb or destroy such resources. Therefore, the proposed project

could result in the direct or indirect destruction of a unique paleontological resource, and a ***potentially significant*** impact could occur.

Mitigation Measure(s)

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

Non-Participating Properties/Simmerhorn Ranch

VII-2. *Should construction or grading activities result in the discovery of unique paleontological resources, all work within 100 feet of the discovery shall cease. The Community Development Director shall be notified, and the resources shall be examined by a qualified archaeologist or paleontologist, 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 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.*

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

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

Non-Participating Properties

The Non-Participating Properties would retain the current General Plan land use designations and development of the Non-Participating Properties is not proposed at this time. Existing development within the Non-Participating Properties currently results in GHG emissions. As discussed in further depth below, the City's recently adopted Climate Action Plan (CAP) included an inventory of existing Citywide emissions as well as an estimation of future emissions based on buildout of the City's General Plan. The City's CAP includes Citywide measures intended to reduce emissions from existing sources, such as those sources that currently exist within the Non-Participating Properties, as well as measures aimed at reducing emissions from future sources related to development within the City. Should any of the Non-Participating Properties be developed in the future, such development would be required to comply with the City's CAP. Consequently, implementation of the proposed project would not result in impacts related to GHG emissions from the Non-Participating Properties.

Simmerhorn Ranch

Implementation of the proposed project would cumulatively contribute to increases of GHG emissions. Estimated GHG emissions attributable to the project would be primarily associated with increases of carbon dioxide (CO_2) and, to a lesser extent, other GHG pollutants, such as methane (CH_4) and nitrous oxide (N_2O) associated with area sources, mobile sources or vehicles, utilities (electricity and natural gas), water usage, wastewater generation, and the generation of solid waste. The primary source of GHG emissions for the project would be mobile source emissions. The common unit of measurement for GHG is expressed in terms of annual metric tons of CO_2 equivalents ($MTCO_2e$/yr).

For disclosure purposes, the GHG emissions associated with the Simmerhorn Ranch Project have been estimated using CalEEMod, based on the modeling assumptions presented in Section III, Air Quality, of this IS/MND. According to the CalEEMod results, the Simmerhorn Ranch Project would result in maximum unmitigated annual construction GHG emissions of 890.86 $MTCO_2e$/yr and unmitigated annual operational GHG emissions of 4,250.61 $MTCO_2e$/yr under the existing setting and 4,642.33 $MTCO_2e$/yr in the

cumulative setting discussed in further depth in Section XVII, Transportation, of this IS/MND.

Multiple agencies maintain guidance for the analysis of GHG emissions in the project area. For instance, SMAQMD has adopted thresholds of significance for GHG emissions during construction and operations of projects. Although SMAQMD maintains GHG emissions thresholds, SMAQMD's CEQA Guidelines note that where local jurisdictions have adopted thresholds or guidance for analyzing GHG emissions, the local thresholds should be used in project analysis. The City of Galt's recently adopted CAP provides a jurisdiction-wide approach to the analysis of GHG emissions. The Galt CAP includes a sustainability checklist to be used in analyzing the consistency of new development projects within the City of Galt with the City's CAP. Accordingly, the sustainability checklist has been completed for the proposed project, and is included as Appendix C of this IS. The analysis presented within the sustainability checklist is summarized below.

The sustainability checklist includes certain requirements for new developments within the City to ensure compliance with the City's CAP. For instance, the sustainability checklist requires that 50 percent of all roadways and intersections within the Simmerhorn Ranch Project be designed with traffic calming measures. The project would be designed in compliance with the recommendations within the *Carillion Boulevard Complete Street Corridor Study*, which would include traffic calming measures, and internal streets would be designed with pedestrian and bicycle infrastructure as appropriate. Depending on the buildout timeline of the project, the Simmerhorn Ranch Project construction fleet may be required to include a percentage of construction equipment meeting the U.S. EPA's Tier 4 standards. Furthermore, the Galt CAP sustainability checklist requires outdoor electrical outlets or infrastructure to support the use of all electric landscaping equipment. Considering that the Simmerhorn Ranch Project would include dedication of a school site, the Simmerhorn Ranch Project would be required to include infrastructure sufficient to provide safe routes to school for future students. Pursuant with the CBSC as well as the City's Municipal Code, the Simmerhorn Ranch Project

- Outdoor landscaping must reduce outdoor water use through compliance with the California Department of Water Resources Model Water Efficient Landscape Ordinance (MWELO) and landscape water efficiency standards set forth in Chapter 18.52 of the Municipal Code;
- 65 percent of construction and demolition waste must be diverted from landfills;
- Installation of high efficacy lighting and water heating systems;
- Installation of electric vehicle charging infrastructure;
- Inclusion of high-performance attics and walls; and
- Implementation of on-site solar energy systems capable of producing 100 percent of the on-site electricity demand for proposed residences.

Although the Simmerhorn Ranch Project site is bordered by agricultural lands and rural residential developments, the existing development within the incorporated City of Galt exists to the north and east of the project site. Furthermore, the land to the south of the project site, across Boessow Road, has been approved for residential development. Thus, while the project does not meet the technical definition for infill development, the project would serve as infill development by providing a linkage in between existing and proposed urban uses within the City of Galt.

Nevertheless, to ensure that the final design of the Simmerhorn Ranch Project fulfills the requirements of the City of Galt's CAP mitigation is requires below to avoid the creation of conflicts between the proposed project and the City of Galt's CAP.

Consequently, the Simmerhorn Ranch Project could generate GHG emissions 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 GHG. Therefore, impacts would be considered ***potentially significant***.

Mitigation Measure(s)

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

VIII-1. *Prior to the issuance of building permits, the project applicant/developer shall incorporate traffic calming measures into project Improvement Plans, on 50 percent of project roadways and intersections, for review and approval by the City Engineer. Traffic calming features may include, but are not limited to, the following features: marked crosswalks, count-down signal timers, curb extensions, speed tables, raised crosswalks, raised intersections, median islands, tight corner radii, roundabouts or mini-circles, on-street parking, planter strips with street trees, and chicanes/chokers. Infrastructure used to achieve this requirement may also be used to provide safe routes to the proposed school site. Infrastructure providing a safe route to school for future students shall include pedestrian and bicycle safety features that allow for pedestrian and bicycle access to the proposed school site.*

VIII-2. *Prior to the issuance of building permits, the project applicant/developer shall demonstrate, to the satisfaction of the City, the incorporation of outdoor electrical outlets or other infrastructure into project Improvement Plans for review and approval by the City Engineer.*

VIII-3. *In the event that project construction occurs after the year 2025:*

Prior to the start of construction activities, the project applicant shall submit a construction equipment inventory list to the City Engineer demonstrating compliance with U.S. EPA Tier 4 engine requirements as outlined in the City's Sustainability Checklist and CAP. The use of alternatively fueled construction equipment, such as hybrid electric or natural gas-powered equipment, would be acceptable, given that such technologies are implemented to a level sufficient to achieve similar emission reductions as would occur with the use of Tier 4 engines.

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

Discussion

a. **Non-Participating Properties**

The Non-Participating Properties would retain the current General Plan land use designations and further development of the Non-Participating Properties is not proposed at this time. Accordingly, construction activities would not occur on the Non-Participating Properties with implementation the proposed project. However, should development occur within the Non-Participating Properties in the future, the proponent for such developments would be required to comply with the regulations of governing the use of potentially hazardous products during both construction and operations of any future development.

Considering that the proposed project would not alter the existing land use within the Non-Participating Properties, the potential impacts related to creating a significant hazard to the public through the routine transport, use, or disposal of hazardous materials would be consistent with the analysis in the General Plan EIR.

Simmerhorn Ranch

Residential, park, and educational uses are not typically associated with the routine transport, use, disposal, or generation of substantial amounts of hazardous materials. Construction activities would involve the use of heavy equipment, which would contain fuels and oils, and various other products such as concrete, paints, and adhesives. All chemicals required for construction activities of the Simmerhorn Ranch Project Site would be required to comply with all relevant California Health and Safety Codes and local City ordinances regulating the handling, storage, and transportation of hazardous and toxic materials. Additionally, on-site maintenance may involve the use common household

cleaning products, fertilizers, and herbicides, any of which could contain potentially hazardous chemicals; however, such products would be expected to be used in accordance with label instructions. Due to the regulations governing use of such products and the small 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.

Conclusion

Based on the above, development of the Non-Participating Properties would not occur as part of the proposed project. Should future development of the Non-Participating Properties occur, any future use of hazardous materials would be limited, and would occur in compliance with the levels anticipated for the project site in the City's General Plan EIR. Furthermore, the Simmerhorn Ranch Project Site would include the development of residential, park, and educational uses, none of which include the routine use, transport, or disposal of hazardous materials during operations. Therefore, the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and a ***less-than-significant*** impact would occur.

b. The following discussion provides an analysis of potential hazards and hazardous materials associated with upset or accident conditions related to the proposed project and the existing site conditions.

Non-Participating Properties

The Non-Participating Properties would retain the current General Plan land use designations and the proposed project would not include development within the Non-Participating Properties. As such, ground-disturbing activities would not occur within the Non-Participating Properties as part of the proposed project. However, because a Phase I ESA has not been completed for the Non-Participating Properties, the potential exists for future development to release hazardous materials into the environment through ground-disturbing activities or demolition of the existing on-site structures. Therefore, without mitigation to ensure future development does not result in the release of hazardous materials into the environment, a potentially significant impact could occur.

Simmerhorn Ranch

Construction activities associated with the Simmerhorn Ranch Project would involve the use of heavy equipment, which would contain fuels and oils, and various other products such as concrete, paints, and adhesives. Small quantities of potentially toxic substances (e.g., petroleum and other chemicals used to operate and maintain construction equipment) would be used at the project site and transported to and from the site during construction. However, the project contractor would be required to comply with all California Health and Safety Codes and local City ordinances regulating the handling, storage, and transportation of hazardous and toxic materials. Thus, construction of the proposed project 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.

Contaminated Soils

Although not documented at the Simmerhorn Ranch Project site, past agricultural activities within the site may have included the use of pesticides, fertilizers, or other chemicals. Agricultural uses could result in concentrations of residual chemicals being present in the near surface soil if use or storage of pesticides, fertilizers, or other chemicals has occurred.

However, upon development of the project, the site would primarily be covered by pavement and other impervious surfaces, thereby limiting future upset of on-site soils. Nonetheless, issues related to contaminated soils could pose a risk to construction workers during ground disturbing activities. Therefore, without a Phase I Environmental Site Assessment (ESA), the proposed project could result in a potentially significant impact related to contaminated soils.

Septic System and Wells

The Simmerhorn Ranch Project Site previously contained facilities related to a dairy facility. Although the facilities were recently demolished, the possibility exists for a well or septic field associated with the past uses to be uncovered during project construction. Proper abandonment and removal of the facilities, if present, would be required prior to construction. Thus, a significant impact could occur.

Conclusion

Although the site is currently vacant and unused, the historical agricultural and livestock activities could have contaminated on-site soils or septic systems and wells may exist within the Simmerhorn Ranch Project Site. Therefore, 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, and a ***potentially significant*** impact could occur.

Mitigation Measure(s)

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

Non-Participating Properties/Simmerhorn Ranch

IX-1. *Prior to initiation of construction activities on the proposed project site, the project applicant shall complete an analysis of on-site soils to determine whether substantial concentrations of organochloride pesticides or other soil contaminants are present above the applicable direct exposure Environmental Screening Levels (ESLs) set by the Regional Water Quality Control Board, the residential screening levels set by the Department of Toxic Substances Control's Human Health Risk Assessment Note 3, and/or the U.S. Environmental Protection Agency's Regional Screening Levels for Region 9. If contaminants are not detected above applicable ESLs/RSLs, then further mitigation is not required. If contaminants are detected above the applicable ESLs/RSLs, then the soils shall be remediated by off-hauling to a licensed landfill facility. Such remediation activities shall be performed by a licensed hazardous waste contractor (Class A) and contractor personnel that have completed 40-hour OSHA hazardous training. The results of soil sampling and analysis, as well as verification of proper remediation and disposal, shall be submitted to the Planning Division for review and approval.*

IX-2. *Prior to issuance of grading permits, the site shall be examined for existing septic systems. If septic systems are not found, no further mitigation is required. In the event of a discovery, the system shall be abandoned in consultation with the Sacramento County Environmental Management*

Department. Proof of abandonment shall be provided to the City Community Development Department and City Engineer.

IX-3. *Prior to initiation of any ground disturbance activities, a survey shall be performed to inspect the site for abandoned wells. If wells are not found, no further mitigation is required. If any wells are found, the applicant shall hire a licensed well contractor to obtain a well abandonment permit from Sacramento County Environmental Management Department and properly abandon the on-site wells to the satisfaction of the Sacramento County Environmental Health Department. Proof of abandonment shall be provided to the City Community Development Department and City Engineer.*

c. **Non-Participating Properties**

The Non-Participating Properties are located within a quarter mile of Galt High School, located approximately 0.20-mile west of the southernmost portion of the Non-Participating Properties. Existing uses within the Non-Participating Properties do not involve the use or transport of hazardous materials. Although further development activity within the Non-Participating Properties is not proposed at this time, should future development occur in the future, such development would be anticipated to occur in compliance with the existing land use designations included in the City's General Plan and any potential impacts resulting from such potential future development have been previously anticipated in the City's General Plan EIR.

Nevertheless, implementation of Mitigation Measure IX-1 requires preparation of a Phase I ESA prior to any future development within the Non-Participating Properties. The Phase I ESA required by Mitigation Measure IX-1 would identify any RECs and provide mitigation measures should any RECs be identified.

Simmerhorn Ranch

The Simmerhorn Ranch Project Site is located approximately 0.26-mile from Galt High School. Moreover, the Simmerhorn Ranch Project has limited potential for the routine transport, use, or disposal of hazardous materials as discussed above in Questions 'a' & 'b'. The proposed residential, park, and educational uses would not involve the routine transport, use, or dispose of hazardous materials, or present a reasonably foreseeable release of hazardous materials.

Conclusion

Based on the above, the proposed project would result in a ***less-than-significant*** impact related to hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

d. **Non-Participating Properties / Simmerhorn Ranch**

According to the Department of Toxic Substance Control's Hazardous Waste and Substances Site List, the East Galt Infill Annexation Area does not include a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.[23] However, without preparation of a Phase I ESA, the existing conditions

[23] Department of Toxic Substances Control. Hazardous Waste and Substances Site List. Available at: https://www.envirostor.dtsc.ca.gov/public/search.asp?cmd=search&reporttype=CORTESE&site_type=CSITES. Accessed November 2019.

of the East Galt Infill Annexation Area are still unknown. With implementation of Mitigation Measure IX-1, impacts related to creating a significant hazard to the public or the environment would be reduced. Thus, the proposed project would not create a significant hazard to the public or the environment, and a ***less-than-significant*** impact would occur.

e. **Non-Participating Properties/Simmerhorn Ranch**

The nearest airport to the East Galt Infill Annexation Area is Bottimore Ranch Airport, located approximately 2.9 miles northeast of the site.. As such, the neither the Non-Participating Properties nor the Simmerhorn Ranch Project Site are located within two miles of any public airports, and does not fall within an airport land use plan area. Therefore, ***no impact*** would occur related to the project being located within an airport land use plan or within two miles of a public airport or public use airport, thereby resulting in a safety hazard or excessive noise for people residing or working in the project area.

f. **Non-Participating Properties**

The Non-Participating Properties would retain the current General Plan land use designations and development of the Non-Participating Properties is not proposed at this time. Considering that the proposed project would not alter the existing land use within the Non-Participating Properties, the potential impacts related to impairing the implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan would be consistent with the analysis in the General Plan EIR.

Simmerhorn Ranch

The Simmerhorn Ranch Project Site has been designed in compliance with the City of Galt's standards for roadway design and access. As such, adequate emergency access would be provided to the Simmerhorn Ranch Project Site with implementation of the proposed project. During construction of the proposed project, all construction equipment would be staged on-site so as to prevent obstruction of local and regional travel routes in the City that could be used as evacuation routes during emergency events. Transportation-related improvements implemented as part of the Simmerhorn Ranch Project would largely be limited to on-site improvements, and would be designed per the City of Galt's existing standards for roadways and emergency access. Therefore, the development of the Simmerhorn Ranch Project Site would not be anticipated interfere with an adopted emergency response plan, and a less-than-significant impact would occur.

Conclusion

Based on the above, the proposed project would not impair implementation of or physically interfere with an existing emergency response plan or emergency evacuation plan. As a result, the project would have a ***less-than-significant*** impact related to such.

g. **Non-Participating Properties/Simmerhorn Ranch**

Issues related to wildfire hazards are discussed in Section XX, Wildfire, of this IS/MND. As noted therein, the Non-Participating Properties and the Simmerhorn Ranch Project Site are not located within or near a Very High Fire Hazard Severity Zone.[24] However, grass fires can occur on uncultivated lands, particularly where there is native vegetation. Given that the East Galt Infill Annexation Area is surrounded by residential areas, agricultural property, and cultivated land, wildland fire vulnerability is considered low. Based on the

[24] California Department of Forestry and Fire Protection. *Sacramento County, Very High Fire Hazard Severity Zones in LRA*. July 20, 2008.

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

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

Discussion

a. **Non-Participating Properties**

The Non-Participating Properties would retain the current General Plan land use designations and further development of the Non-Participating Properties is not proposed at this time. Accordingly, construction activities would not occur on the Non-Participating Properties with implementation the proposed project. Should development occur within the Non-Participating Properties in the future, all such development would be subject to the relevant regulations within the City's General Plan and Municipal Code, as well as other regulations as discussed for the Simmerhorn Ranch Project below. Considering the lack of current development proposals for the Non-Participating Properties as well as the existing regulations related to the protection of water quality, the proposed project would not be anticipated to result in impacts related to water quality due to annexation of the Non-Participating Properties.

Simmerhorn Ranch

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

The City of Galt has a Phase I National Pollutant Discharge Elimination System (NPDES) permit and is part of the Sacramento Stormwater Quality Partnership (SSQP). The City of Galt is regulated by Order No. R5-2002-0206 NPDES No. CAS082597, "Waste Discharge Requirements for County of Sacramento and Cities of Citrus Heights, Elk Grove, Folsom, Galt and Sacramento Storm Water Discharges From Municipal Separate Storm Sewer Systems Sacramento County" issued by the Central Valley Regional Water Quality Control Board (CVRWQCB). However, the City of Galt Municipal Separate Storm Sewer System (MS4) is noncontiguous with other MS4s and is surrounded by rural and agricultural areas that are not subject to NPDES regulations.

The City of Galt participates in the County-wide Sacramento Stormwater Quality Improvement Program (SQIP), which was established in 1990 to reduce the pollution carried by stormwater into local creeks and rivers. The SQIP is based on the NPDES municipal stormwater discharge permit. The comprehensive SQIP includes pollution reduction activities for construction sites, industrial sites, illegal discharges and illicit connections, new development, and municipal operations.

Grading and excavation during construction, as well as development of new structures associated with the proposed project, would create the potential to degrade water quality from increased sedimentation and increased discharge (increased flow and volume of runoff) associated with stormwater runoff. Disturbance of site soils would increase the potential for erosion from stormwater. The State Water Resources Control Board (SWRCB) adopted a statewide general NPDES permit for stormwater discharges associated with construction activity. Dischargers whose projects disturb one or more acres of soil are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ. Construction activity subject to the General Permit includes clearing, grading and disturbances to the ground such as stockpiling, or excavation. The Simmerhorn Ranch Project would include disturbance of more than one acre of land, and, thus, is subject to the relevant requirements within the aforementioned General Permit.

According to the Preliminary Drainage Analysis prepared for the Simmerhorn Ranch Project, stormwater detention basins would act as water quality treatment facilities during operation.[25] In addition, the Simmerhorn Ranch Project would include low impact development (LID) features such as disconnected roofs and landscape buffers that would provide further stormwater volume and quality controls. The stormwater treatment system within the detention basins would be designed to be a volume-based treatment. Based on the extent of proposed development, a total of 5.1 gross acres over two locations have been dedicated for use as water quality basins within the Simmerhorn Ranch Project Site. The provision of on-site detention basis would accommodate water quality storage, as well as flood control and hydromodification. Additionally, as discussed under questions 'ci' through 'ciii' the Preliminary Drainage Analysis concluded that the basins and other infrastructure would ensure that the proposed project meets the relevant hydromodification requirements.

It should be noted that near-surface groundwater could be present within the project site. Should near-surface groundwater be present within the Simmerhorn Ranch Project Site, construction activities may require dewatering activities, which could result in the violation of discharge requirements.

[25] Wood Rodgers, Inc. *Simmerhorn Ranch (119.5 acres) Preliminary Storm Drainage Analysis*. March 22, 2019.

Construction activity associated with the Simmerhorn Ranch Project would be required to implement any applicable goals, policies and Best Management Practices (BMPs) set forth by the above programs. Construction related BMPs would likely include, but are not limited to, installation of storm drain inlet protection, stabilization of construction exists, and proper maintenance of material stock piles. The project's compliance with the requirements of the SWRCB, the SQIP, and the City of Galt's Stormwater Management Program would ensure that construction activities, and operation of the project, would not result in degradation of downstream water quality. Compliance with the foregoing requirements is typically demonstrated through implementation of a Stormwater Pollution Prevention Plan (SWPPP). However, a SWPPP has not yet been prepared for the Simmerhorn Ranch Project. Without preparation of a SWPPP, proper implementation of BMPs can not be ensured at this time, and the proposed project's construction activities could result in an increase in erosion, and consequently affect water quality.

Conclusion

Based on the above, impacts would not occur associated with the Non-Participating Properties. In addition, compliance with the SWRCB standards and City's NPDES Permit would ensure that construction activities associated with the Simmerhorn Ranch Project do not result in the degradation of water quality. However, without proper implementation of a SWPPP prepared for the Simmerhorn Ranch Project and mitigation to ensure potential dewatering activities do not result in impacts to water quality, construction of the proposed Simmerhorn Ranch development could violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Thus, a ***potentially significant*** impact would occur.

Mitigation Measure(s)

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

Simmerhorn Ranch

X-1. *Prior to the issuance of grading permits, the developer shall obtain and comply with the NPDES general construction permit including the submittal of a Notice of Intent (NOI) and associated fee to the SWRCB and the preparation of a SWPPP that includes both construction stage and permanent storm water pollution prevention practices to be submitted to the City Engineer for review.*

X-2. *If a site-specific geotechnical report identifies a near-surface groundwater table within the project site, the project applicant shall obtain the appropriate NPDES dewatering general permit prior to commencement of dewatering activities. Should such a permit be required, the project applicant shall prepare a Dewatering Plan that includes measures sufficient to ensure that dewatering activity does not result in a violation of water quality standards. Such measures may include sediment detention basins or clarifiers sufficient to properly treat any dewatering runoff prior to discharge. The plan shall be reviewed and approved by the City Community Development Department.*

b,e. **Non-Participating Properties**

As previously discussed, the proposed project does not include development within the Non-Participating Properties. As such, the proposed project would not be anticipated to increase the amount of impervious surfaces or demand for water within the Non-Participating Properties that could deplete groundwater supplies or interfere with recharge on the Non-Participating Properties. Although development of the Non-Participating Properties is not proposed at this time, the City's General Plan has anticipated future development within the Non-Participating Properties. The proposed project would not result in alterations to the existing land use designations of the Non-Participating Properties; consequently, the potential impacts to the degradation of water supplies or conflicts with groundwater management plans would be consistent with the analysis presented in the General Plan EIR.

Simmerhorn Ranch

Water supplies for the project site are supplied by the City of Galt. Per the City's 2015 Urban Water Management Plan (UWMP),[26] the City of Galt's groundwater is derived from the Cosumnes Subbasin, which is part of the San Joaquin Valley Groundwater Basin. Despite growth within the City of Galt, on-going groundwater use, and the uncertainty of overdraft conditions, monitoring groundwater levels within the City has shown little change in depth to groundwater since 1961. The 2015 UWMP concludes that groundwater resources within the City are anticipated to be sufficient to meet future demand. Increases in demand for groundwater that occur with buildout of the City, including buildout of the project site, can be met through continued pumping from existing wells and the construction of new wells as needed.[27] The proposed project is not anticipated to require construction of a new well, and continued pumping from existing City of Galt wells is not anticipated to inhibit the use of groundwater by the City.

Implementation of the Simmerhorn Ranch Project would include overlay of large portions of the project site with impervious surfaces. Despite development of the project site with urban uses, portions of the project site would remain pervious. For instance, the Simmerhorn Ranch Project would include provision of a 6.5-acre park, the majority of which would be pervious green space, as well as 7.5 acres of landscaping areas. The proposed residential developments would also include LID measures, such as disconnected downspouts. The provision of parkland, landscaping areas, and LID measures would allow stormwater to continue to percolate through on-site soils and recharge groundwater. Finally, once stormwater is treated on-site, the treated stormwater would be discharged to an existing culvert that leads to Dry Creek. Stormwater discharged to Dry Creek could infiltrate the soil underlying Dry Creek, thus contributing to recharge of groundwater in the project area. Considering the above, implementation of the project would limit groundwater infiltration within the project site; however, some recharge of groundwater on-site would continue to occur.

Although the Simmerhorn Ranch Project involves a request for amendments to the General Plan, the proposed General Plan Amendment would result in shifting of land uses within the Simmerhorn Ranch Project Site, but would not introduce new or more intensive uses than what was previously anticipated for the site. Consequently, buildout of the Simmerhorn Ranch Project Site would result in similar impacts as was previously anticipated for the project site in the City's General Plan EIR.

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[26] City of Galt. *2015 Urban Water Management Plan Update*. June 2016.
[27] City of Galt. 2015 *Urban Water Management Plan Update*. June 2016.

Conclusion

Given the above, the project would not result in increased use of groundwater supplies beyond what has been anticipated by the City and accounted for in the UWMP. Moreover, groundwater recharge would continue to occur within the Simmerhorn Ranch Project Site following implementation of the proposed project. Therefore, the proposed project would result in a ***less-than-significant*** impact with respect to substantially decreasing groundwater supplies or interfering substantially with groundwater recharge such that the project would impede sustainable groundwater management of the basin. In addition, the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

ci-iii. **Non-Participating Properties**

Development within the Non-Participating Properties is not proposed at this time, and the Non-Participating Properties would retain the currently adopted General Plan land use designations with implementation of the proposed project. Because the Non-Participating Properties would retain the current General Plan Land Use designations, potential impacts resulting from future development of the Non-Participating Properties would occur consistent with the findings of the City's General Plan EIR. Because development within the Non-Participating Properties is not proposed at this time and has been previously analyzed in the City's General Plan EIR, implementation of the proposed project would not result in any impacts related to alterations of existing drainage patterns.

Simmerhorn Ranch

The Simmerhorn Ranch Project Site primarily consists of disturbed land, previously used for dairy and agricultural operations. Implementation of the proposed project would involve grading of the site, development of 429 single-family residential lots, development of a park, and future development of a school site. The proposed uses are not considered substantial sources of pollutants during operations. However, the proposed development would increase the amount of impervious surfaces within the Simmerhorn Ranch Project Site and alter the drainage pattern within the site. Considering the amount of impervious surfaces that would be developed within the Simmerhorn Ranch Project Site, the altering of on-site drainage patterns could increase the rate or amount of runoff on- and off-site.

The on-site drainage system would be designed to meet the requirements of Section 9 of the Sacramento County Improvement Standards as well as the draft Sacramento Region Stormwater Quality Design Manual. Sacramento County drainage requirements include the following:

- One-ft of freeboard to manholes and 0.5-ft freeboard to inlets during the design storm event;
- Pad elevations must be 1.2-ft above Base Flood Elevation;
- Ponding cannot exceed 12 inches above the lip of the gutter;
- Drainage must be conveyed in closed conduits for developments smaller than 160 acres; and
- No adverse impacts to upstream or downstream channels.

Sacramento County stormwater quality requirements include the following:

- 48-hour drawdown time;
- Depth of water quality volume in treatment basin not to exceed one foot; and
- Hydromodification requirements must be met.

According to Preliminary Drainage Memo, the on-site drainage system would designed to meet the requirements of Section 9 of the Sacramento County Improvement Standards as well as the draft Sacramento Region Stormwater Quality Design Manual.[28] Flood control and hydromodification for the Simmerhorn Project site would be provided by two detention basins located within the project site. In addition to the two detention basins, the proposed project would include LID measures such as disconnected roofs and landscape buffers that would aid in both water quality treatment, as well as hydromodification.

Although the project engineer has concluded that the preliminary design of the Simmerhorn Ranch Project, including the aforementioned stormwater features, would be sufficient to meet all of the requirements of Section 9 of the Sacramento County Improvement Standards as well as the draft Sacramento Region Stormwater Quality Design Manual, a final drainage plan has not been prepared for the Simmerhorn Ranch Project that demonstrates such compliance. Without preparation of a final drainage plan compliance with all relevant requirements cannot be ensured at this time.

Conclusion

Based on the above, the proposed project would be required to comply with all applicable regulations, would not involve uses associated with the generation or discharge of polluted water, and would be designed to adequately treat stormwater runoff from the site prior to discharge. Development of the Non-Participating Properties is not proposed at this time, and, thus, the proposed project would not result in impacts related to altered drainage patterns in the Non-Participating Properties. However, without preparation of a final drainage plan, the Simmerhorn Ranch Project could substantially alter drainage patterns within the Simmerhorn Ranch Project Site, which could result in substantial erosion, siltation, or contribution of polluted runoff. Thus, the proposed would result in a ***potentially significant*** impact.

Mitigation Measure(s)

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

Simmerhorn Ranch

X-3. *Implement Mitigation Measure X-1 and X-2.*

X-4. *Prior to issuance of grading permits, the developer shall submit a Final Drainage Plan to the City. The Final Drainage Plan shall identify permanent stormwater control measures to be implemented within the project site. The final plan shall include calculations demonstrating that post-project stormwater flows comply with the applicable provisions of Section 9 of the Sacramento County Improvement Standards as well as the draft Sacramento Region Stormwater Quality Design Manual. The Final Drainage Plan shall be submitted to the Public Works Department for review and approval.*

[28] Wood Rodgers, Inc. *Simmerhorn Ranch (119.5 acres) Preliminary Storm Drainage Analysis*. March 22, 2019.

civ. **Non-Participating Properties**

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map for the project site, the majority of the Non-Participating Properties are located within an Area of Minimal Flood Hazard (Zone X).[29] However, a portion of the northern most corner of the Non-Participating Properties is considered a Special Flood Hazard Area (Zone A). The remainder of the Non-Participating Properties is not within the 100-year floodplain.

The Non-Participating Properties would retain the currently adopted General Plan land use designations and development of the Non-Participating Properties would not occur as part of the proposed project. Should a future project be proposed within the special flood hazard zone within the Non-Participating Properties, such projects would be subject to all relevant regulations within Chapter 19.20, Provisions for Flood Hazard Reduction, within the City's Municipal Code. Compliance with Chapter 19.20 of the City's Municipal Code would ensure that potential future development within the Non-Participating Properties would not result in impacts related to the creation of impediments to flood flows.

Simmerhorn Ranch

According to the FEMA Flood Insurance Rate Map for the Simmerhorn Ranch Project Site, the project site is located within an Area of Minimal Flood Hazard (Zone X).[30] The site is not classified as a Special Flood Hazard Area or otherwise located within a 100-year or 500-year floodplain. Therefore, the Simmerhorn Ranch Project would not place housing within a 100-year flood hazard area, place within a 100-year floodplain structures that would impede or redirect flood flows, or expose people or structures to a significant risk of loss, injury or death involving flooding.

Conclusion

Based on the above, the Simmerhorn Ranch Project would not place housing within a 100-year flood hazard area in a way that would impede or redirect flood flows. Should development occur within the Non-Participating Properties, such development would be subject to existing City regulations. Therefore, the proposed project would not impede or redirect flood flows and a ***less-than-significant*** impact would result.

d. **Non-Participating Properties/Simmerhorn Ranch**

As discussed under question 'civ' above, the Simmerhorn Ranch Project Site is not located within a flood hazard zone, and only a small portion of the Non-Participating Properties include a special flood hazard zone. Development of the Non-Participating Properties is not proposed at this time, and any future development within the Non-Participating Properties would be subject to existing Municipal Code requirements that would ensure that hazards relating to flooding are not created due to development in the Non-Participating Properties. Tsunamis are defined as sea waves created by undersea fault movement, whereas a seiche is a long-wavelength, large-scale wave action set up in a closed body of water such as a lake or reservoir. The East Galt Infill Annexation Area is not located in proximity to a coastline and would not be potentially affected by flooding risks associated with tsunamis. Seiches do not pose a risk to the existing and proposed structures, as the East Galt Infill Annexation Area is not located adjacent to a large closed body of water. Based on the above, the proposed project would not pose a risk related to

[29] Federal Emergency Management Agency. *Flood Insurance Rate Map 060670468J.* Effective October 20, 2016.
[30] Federal Emergency Management Agency. *Flood Insurance Rate Map 060670468J.* Effective October 20, 2016.

the release of pollutants due to project inundation due to flooding, tsunami, or seiche, and would be ***less-than-significant***.

XI. LAND USE AND PLANNING. *Would the project:*	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Physically divide an established community?	☐	☐	✖	☐
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	✖	☐

Discussion

a. **Non-Participating Properties/Simmerhorn Ranch**

A project risks dividing an established community if the project would introduce infrastructure or alter land use so as to change the land use conditions in the surrounding community, or isolate an existing land use. The East Galt Infill Annexation Area includes existing residences, agricultural uses, and accessory structures. Residences within the Non-Participating Properties would remain unchanged with implementation of the proposed project. Implementation of the Simmerhorn Ranch Project would include development of 429 single-family residences, a school site, and a park site, as well as supporting infrastructure, such as roadways. Roadway infrastructure would include improvements to existing roadways, such as Simmerhorn Road, Marengo Road, and Boessow Road, as well as extension of Carillion Boulevard through the Simmerhorn Ranch Project Site. The proposed developments would not result in a division of an established community, but would instead improve the connectivity of the East Galt Infill Annexation Area with other portions of the City of Galt, principally the area west of SR 99. Furthermore, as discussed under question 'b' below, the proposed project would be generally consistent with relative General Plan and Municipal code policies. As such, the proposed project would not physically divide an established community and a ***less-than-significant*** impact would occur.

b. **Non-Participating Properties/Simmerhorn Ranch**

The East Galt Infill Annexation Area is designated for agricultural residential uses, auto commercial uses, and urban reserve. In addition, the City of Galt has designated the site for various urban uses, such as low, medium, and medium high density residential, mixed-use, commercial, light industrial, park, open space, and public/quasi-public. The proposed project would not involve any changes to the land use designations assigned to the Non-Participating Properties by the City of Galt's General Plan. Although the Simmerhorn Ranch Project would include a General Plan amendment, the amendment would allow for the redistribution of uses on-site, and would not introduce any uses that were not previously anticipated for the Simmerhorn Ranch Project Site. The project site is in close proximity to existing urban uses associated with the City of Galt, and the proposed circulation improvements included in the Simmerhorn Ranch Project would improve the connectivity of the City of Galt. The proposed Simmerhorn Ranch Project would be consistent with the planned residential uses proposed directly to the south of the project site, opposite the site across Boessow Road, and would be consistent with the residential uses that exist to the west of SR 99.

Despite inclusion of a request for amendments to the General Plan, the Simmerhorn Ranch Project and any potential future development within the Non-Participating Properties would be required to comply with all applicable development standards established by Title 18 of the City's Municipal Code. The development standards include maximum lot coverage, building heights, and building setback requirements.

In addition, the proposed project would not conflict with any City policies and regulations adopted for the purpose of avoiding or mitigating an environmental effect. For example, the proposed project would comply with the City of Galt General Plan Noise Element. Additionally, as discussed in Section IV, Biological Resources, with implementation of Mitigation IV-22, the proposed project would comply with Section 18.52.060, The Cutting and Removal of Heritage Oak and Public Trees, of the City's Municipal Code.

Furthermore, the proposed project would not conflict with any LAFCo standards or policies regarding annexations. In order for LAFCo to make determinations required under Section 56668 of the Cortese-Knox-Hertzberg Local Government Reorganization Act (CKH) (Government Code Section 56000 et seq.), further analysis and discussion regarding the extent to which the proposed project would contribute to environmental justice and the consistency with SACOG's Blueprint Project is provided below.

Environmental Justice

Although environmental justice is not a CEQA issue, a brief summary of the topic related to the proposed project is provided and will also be provided in the City's staff report for the proposed project. The CKH states in Government Code Section 56668(o) that "environmental justice" means the fair treatment of people of all races, cultures, and incomes with respect to the location of public facilities and the provision of public services. With approval of the proposed project and annexation into the City of Galt, all public services would be provided to the project site by the City of Galt. Therefore, the proposed project would not result in environmental injustice with respect to the provision of public services. It should be noted that City services such as water and wastewater utilities would be provided to the Simmerhorn Ranch Project Site upon development of that site, the Non-Participating Properties would only be required to connect to City services at such time as further development within the properties is proposed. In addition, as discussed in the Public Services, Recreation, and Utilities and Services sections of this IS/MND, with the implementation of Mitigation Measures, all impacts would be less-than-significant.

SACOG's Blueprint Project

The SACOG Board of Directors adopted the "Preferred Blueprint Scenario" in December 2004, which is a vision for growth in the Sacramento region. The Preferred Blueprint Scenario comprises of the following seven growth principles:

- Transportation Choices;
- Mixed-Use Development;
- Compact Development;
- Housing Choice and Diversity;
- Use of Existing Assets;
- Quality Design; and
- Natural Resources Conservation.

The proposed project would directly implement several of the growth principles included in the Preferred Blueprint Scenario. The Simmerhorn Ranch Project's pedestrian friendly design would encourage people to walk or ride bicycles. For instance, all streets would include sidewalks, and all arterial streets would include bicycle infrastructure. In addition, the Simmerhorn Ranch Project would provide compact and efficient development in order to maximize efficiency, minimize energy consumption, and reduce greenhouse gas emissions. In particular, Unit 3 within the Simmerhorn Ranch Project Site would be

developed with medium high residential densities, which would provide for a compact development form. The proposed medium high density developments would be complimented by medium and low density residential units that would provide a range of housing options within the development. The East Galt Infill Annexation Area is located in close proximity to existing developments within the City of Galt, including Downtown Galt, Galt Joint Union High School, and Chabolla Park. Development of the proposed uses in close proximity to the existing developments within Downtown Galt would allow future residents to easily access existing amenities and services.

Sacramento County LAFCo Standards

The discussion in Table 5 evaluates the proposed annexation of the project site in light of relevant Sacramento County LAFCo policies and standards regarding annexation and reorganization found in Chapter V of the Sacramento LAFCo Policy, Standards and Procedures Manual.

As demonstrated in Table 5, the proposed project is generally consistent with the standards set forth by Sacramento County LAFCo. Ultimately, the reorganization is a discretionary action by Sacramento County LAFCo. Therefore, the proposed project would have a less-than-significant impact.

Conclusion

Based on the above, the project would not cause a significant environmental impact due to conflicts with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, a ***less-than-significant*** impact would occur.

Table 5
Sacramento County LAFCo Policy Discussion

Policy	Project Consistency
Annexations to Cities	
1. LAFCo will utilize Spheres of Influence through application of the following standards: 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 agency for territory within its Sphere of Influence; d. An annexation must be consistent with a city's Master Services Plan Element of its Sphere of Influence Plan; and 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.	a. The project site is located completely within the City of Galt's SOI and is within the City of Galt General Plan Area. b. The proposed project does not include an SOI amendment. c. The project site is anticipated for development and the impacts of such have been analyzed in the City's General Plan EIR; therefore, the project site is part of the City's long range vision for community expansion and development. d. An updated Municipal Services Review would be submitted to the Sacramento County LAFCo at such time the annexation process has been initiated. e. The proposed project is located adjacent to the current Galt city limits and is located completely within the City of Galt's SOI. The project includes annexation of the Non-Participating Properties specifically as a means of reducing the potential for the Simmerhorn Ranch Project to lead to the creation of an island. Consequently, implementation of the proposed project, which involves annexation of the entire East Galt Infill Annexation Area, would not result in the creation of an island and would represent a logical change to the City's boundaries.
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: a. Does not exceed 300 acres; b. Is owned by the City; c. Is used for municipal purposes; and d. Is located within the same county as the city.	The project site is contiguous with the existing boundaries of the City of Galt on three sides (north, west, and south).

Table 5
Sacramento County LAFCo Policy Discussion

Policy	Project Consistency
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 when 50 percent of the property on either or both sides of the street is within the City.	All roadways included in the proposed annexation would be maintained by the City following annexation. The western half of Marengo Road, which creates the eastern boundary of the East Galt Infill Annexation Area would be improved to City standards, while future developments on the eastern half of Marengo Road would be responsible for improvement of the eastern half to City standards.
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 rural and agricultural uses to the east, and the City of Galt to the north, west, and south. All roads and rights-of-way within the project site would be annexed into the City of Galt and maintained by the City.
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 contiguous with the existing Galt City limits on the north, west, and south sides of the project site. The project cannot be annexed by another City, and would not result in an island 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.	The extension of services resultant from the proposed project would be part of the annexation process, or, in the case of the Non-Participating Properties, contingent on future development of those properties following annexation into the City.
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.	With the project site's annexation to the City of Galt, the site would be detached from the Galt Irrigation District and Sloughhouse Resource Conservation District and the City of Galt would provide services to the proposed project. Because the City of Galt currently provides utilities services in the vicinity of the project site, the City 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 Galt 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 proposed project upon annexation into the City of Galt.

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

Discussion

a,b. **Non-Participating Properties/Simmerhorn Ranch**

Buildout of the City's General Plan has been previously analyzed in the City's General Plan EIR. The General Plan EIR determined that impacts to mineral resources would be less-than-significant. Although the Simmerhorn Ranch Project would include General Plan Amendments, the proposed amendments would involve shifting uses internally within the site, and would not result in any changes to the analysis provided within the General Plan EIR related to Mineral Resources. Additionally, the City of Galt is within Sacramento County's General Plan area, which analyzes mineral resources within the County. According to the Sacramento County General Plan the mineral zone closest to the City of Galt is located near New Hope Road. New Hope Road is located approximately 1.5 miles southeast east of the East Galt Infill Annexation Area. The East Galt Infill Annexation Area itself is not known to contain any mineral resources, and, due to the lack of known resources on-site, construction of the proposed Simmerhorn Ranch Project Site and annexation of the Non-Participating Properties would not result in the loss of any known resource. Furthermore, mineral extraction activity on the project site would not be compatible with the existing uses within the East Galt Infill Annexation Area and in the vicinity. Therefore, a ***less-than-significant*** impact to mineral resources would occur.

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

Discussion

The following discussion is based primarily on a Noise Assessment prepared for the proposed project by Saxelby Acoustics (see Appendix D).[31] The Noise Assessment included consideration of the annexation of the entire East Galt Infill Annexation Area as well as development of the Simmerhorn Ranch Project.

a. The following sections present information regarding sensitive noise receptors in proximity to the project site, the existing noise environment, and the potential for the proposed project to result in impacts during project construction and operation. The following terms are referenced in the sections below:

- Decibel (dB): A unit of sound energy intensity. An A-weighted decibel (dBA) is a decibel corrected for the variation in frequency response to the typical human ear at commonly encountered noise levels. All references to decibels (dB) in this report will be A-weighted unless noted otherwise.
- Average, or equivalent, sound level (L_{eq}): The L_{eq} corresponds to a steady-state A weighted sound level containing the same total energy as a time varying signal over a given time period (usually one hour).
- Day-Night Average Level (Ldn): The average sound level over a 24-hour day, with a +10 decibel weighing applied to noise occurring during nighttime (10:00 PM to 7:00 AM) hours.

Sensitive Noise Receptors

Some land uses are considered more sensitive to noise than others, and, thus, are referred to as sensitive noise receptors. Land uses often associated with sensitive noise receptors generally include residences, schools, libraries, hospitals and passive recreational areas. Noise sensitive land uses are typically given special attention in order to achieve protection from excessive noise. In the vicinity of the project site, sensitive land uses include existing single-family residential uses located to the north, northeast, northwest, southwest, and planned residences to the south.

[31] Saxelby Acoustics. *Simmerhorn Ranch. January 9, 2020*.

Existing Noise Environment

The existing noise environment in the project area is primarily defined traffic on Simmerhorn Road, Marengo Road, and Boessow Road.

To quantify the existing ambient noise environment in the project vicinity, Saxelby Acoustics conducted three continuous (24-hour) noise level measurements and four short-term noise level measurements in the vicinity of the project site. Noise measurement locations are shown in Figure 13, and a summary of the noise level measurement survey results is provided in Table 6.

Table 6
Summary of Existing Background Noise Measurement Data

Site	Date	CNEL /L_{dn}	Average Measured Hourly Noise Levels (dBA)					
			Daytime (7 AM to 10 PM)			Nighttime (10 PM to 7 AM)		
			L_{eq}	L_{50}	L_{max}	L_{eq}	L_{50}	L_{max}
LT-1	04/24/19	62	58	45	73	55	53	65
LT-2	04/24/19	70	67	57	85	62	52	81
LT-3	04/24/19	68	66	56	86	60	53	80
ST-1	04/25/19	N/A	63	56	77	N/A	N/A	N/A
ST-2	04/25/19	N/A	63	47	81	N/A	N/A	N/A
ST-3	04/25/19	N/A	54	54	70	N/A	N/A	N/A
ST-4	04/25/19	N/A	63	48	79	N/A	N/A	N/A

Source: Saxelby Acoustics. 2020.

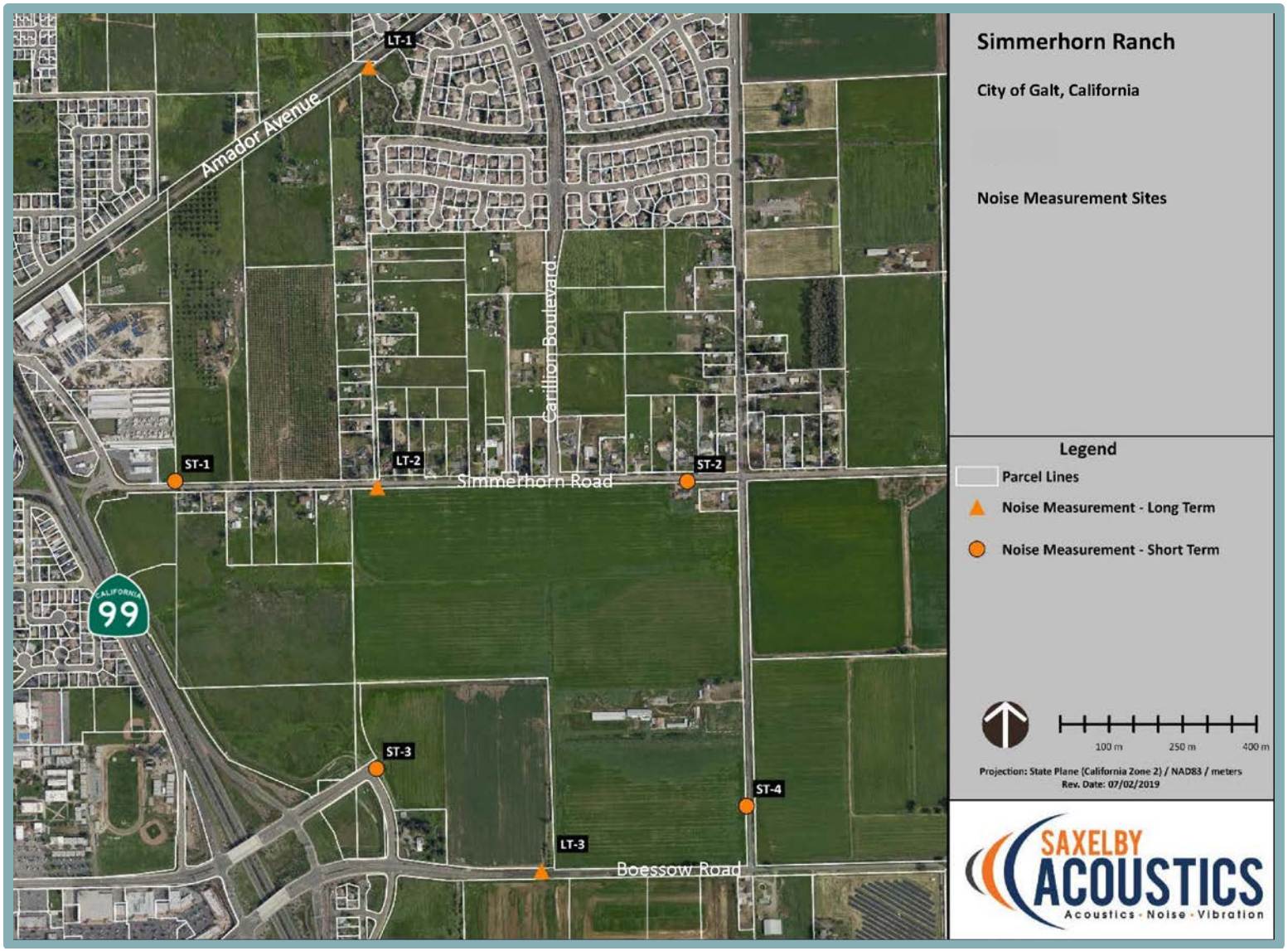
Standards of Significance

The City of Galt General Plan Noise Element establishes a noise level standard of 60 dB as normally acceptable at residential land uses. Noise levels up to 70 dB are considered conditionally acceptable for residential uses. The City of Galt considers the following significance criteria for noise impacts:

- If the noise level resulting from project operations would exceed the "normally acceptable" range for a given land use where the existing noise level exceeds the normally acceptable range, a 3 dBA or greater increase due to a project is considered significant;
- If the noise level resulting from project operations would exceed the "normally acceptable" range for a given land use where the existing noise level is within the normally acceptable range, a 5 dBA or greater increase due to a project is considered significant; and
- If the noise level resulting from project operations would be within the "normally acceptable" range for a given land use, a 10 dBA or greater increase due to a project is considered significant.

In addition to General Plan standards noted above, Section 8.40.040 of the City's Municipal Code outlines criteria for "non-transportation" or "locally regulated" noise sources.

Figure 13
Noise Measurement Locations



Source: Saxelby Acoustics, 2020.

The noise level performance standards for non-transportation noise in the City of Galt are shown in Table 7 below.

Table 7
Noise Level Performance Standards for Residential Areas Affected by Non-Transportation Noise

Noise Level Descriptor	Exterior Noise Level Standards, dBA	
	Daytime (7 AM-10 PM)	Nighttime (10 PM-7 AM)
Hourly L_{eq}, dB	50	45
Maximum Level, dB	70	65

Source: City of Galt Municipal Code.

Impact Analysis

The following sections provide an analysis of potential noise impacts associated with the proposed project.

Non-Participating Properties

The proposed project does not include development within the Non-Participating Properties. As such, the proposed project would not result in any construction-related noise associated with the Non-Participating Properties, nor would the project result in increased operational noise associated with the Non-Participating Properties. Future development of the Non-Participating Properties has been anticipated within the General Plan EIR, and should development occur within the Non-Participating Properties subsequent to approval of the proposed project, noise related impacts resulting from such development would not exceed the levels previously analyzed in the City's General Plan EIR. Nevertheless, because vehicle traffic associated with the Non-Participating Properties was included in the traffic volume estimates used in the Traffic Impact Study prepared for the project, noise related to traffic from the existing and future development within the Non-Participating Properties is inherently included in the operational analysis presented below.

Construction Noise

During construction of the proposed project, heavy-duty equipment would be used for demolition, grading, excavation, paving, and building construction, which would result in temporary noise level increases. Noise levels would vary depending on the type of equipment used, how the equipment is operated, and how well the equipment is maintained. In addition, noise exposure at any single point outside the project site would vary depending on the proximity of construction activities to that point. Standard construction equipment, such as backhoes, dozers, and dump trucks would be used on-site.

Table 8 shows the predicted construction noise levels for development of the proposed project. Based on the table, activities involved in typical construction would generate maximum noise levels up to 90 dB at a distance of 50 feet. Construction activities would be temporary in nature and are anticipated to occur during normal daytime hours.

Table 8
Construction Equipment Noise

Type of Equipment	Maximum Level, dB at 50 feet
Auger Drill Rig	84
Backhoe	78
Compactor	83
Compressor (air)	78
Concrete Saw	90
Dozer	82
Dump Truck	76
Excavator	81
Generator	81
Jackhammer	89
Pneumatic Tools	85

Source: ***Federal Highway Administration, Roadway Construction Noise Model User's Guide, January 2006.***

Noise would also be generated during the construction phase by increased truck traffic on area roadways. A project-generated noise source would be truck traffic associated with transport of heavy materials and equipment to and from the construction site. Noise increase from truck traffic related to the movement of material would be of short duration, and would likely occur primarily during daytime hours.

The City of Galt establishes permissible hours of construction in Section 8.40.060(E) and (F) of the Municipal Code. The ordinance restricts noise-producing construction activities to weekday hours between 6:00 AM and 8:00 PM Monday through Friday, and from 7:00 AM to 8:00 PM on Saturdays and Sundays. During the permissible hours, construction activities are conditionally exempt from the Noise Ordinance Standards established by Section 8.40.040(A) of the City's Municipal Code.

Although construction activities are temporary in nature and would likely occur during normal daytime working hours, construction-related noise could result in sleep interference at existing noise-sensitive land uses in the vicinity of the project if construction activities were to occur outside the normal daytime hours. Therefore, impacts resulting in the 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 could be considered significant.

Project Operational Noise

Operations of the proposed project would generate noise primarily associated with increased traffic on nearby roadways. Transportation related noise at sensitive receptors are discussed in further detail below.

Traffic Noise at New Sensitive Receptors – Exterior Areas

As further discussed in Section XVII. Transportation/Traffic, of this IS/MND, the proposed project would result in an increase in vehicle trips on local roadways. Increased vehicle trips would result in increased noise levels from vehicle traffic along local roadways. The Galt 2030 General Plan EIR considers an increase of at least three dB to be a significant increase in traffic-related noise.

To examine the effect of project-generated traffic increases, traffic noise levels associated with the proposed project were calculated for roadway segments in the project area using the FHWA model. Traffic noise levels were modeled under Existing and Background conditions with and without the proposed project. Table 9 summarizes the modeled traffic noise levels at the nearest sensitive receptors along each roadway segment in the project area.

As shown in Table 9, the proposed project would result in a maximum traffic noise level increase of 1.5 dB. As such, the proposed project would not result in a maximum noise level increase greater than 3.0 dB and a less-than-significant impact would occur related to traffic noise.

Traffic Noise at New Sensitive Receptors – Exterior Areas

Recent rulings by the California Supreme Court have clarified that environmental analyses prepared under CEQA are intended to analyze a project's impact on the environment, rather than the potential impact of the environment on the project. In the case of the proposed project, potential impacts related to future traffic noise on new sensitive receptors within the project site, such as the proposed residences, would be an example of impacts of the environment on the project. Consequently, impacts of noise on future on-site receptors would not typically be considered a required topic of analysis under CEQA. Nevertheless, the City has elected to prepare an analysis of potential noise-related impacts on future residences within the project site to ensure that the Simmerhorn Ranch Project complies with all City regulations intended to protect the health and welfare of the citizens of Galt.

The Simmerhorn Ranch Project includes development of new residential, park, and school uses. Under the 2030 Galt General Plan, residential uses are considered normally acceptable in ambient noise environments up to 60 dBA L_{dn}, and conditionally acceptable in noise environments up to 70 dBA L_{dn}; school uses are considered normally acceptable in ambient noise environments up to 70 dBA L_{dn}, and conditionally acceptable in noise environments up to 70 dBA L_{dn}; and parks are considered normally acceptable in ambient noise environments up to 70 dBA L_{dn}, and conditionally acceptable in noise environments up to 75 dBA L_{dn}.

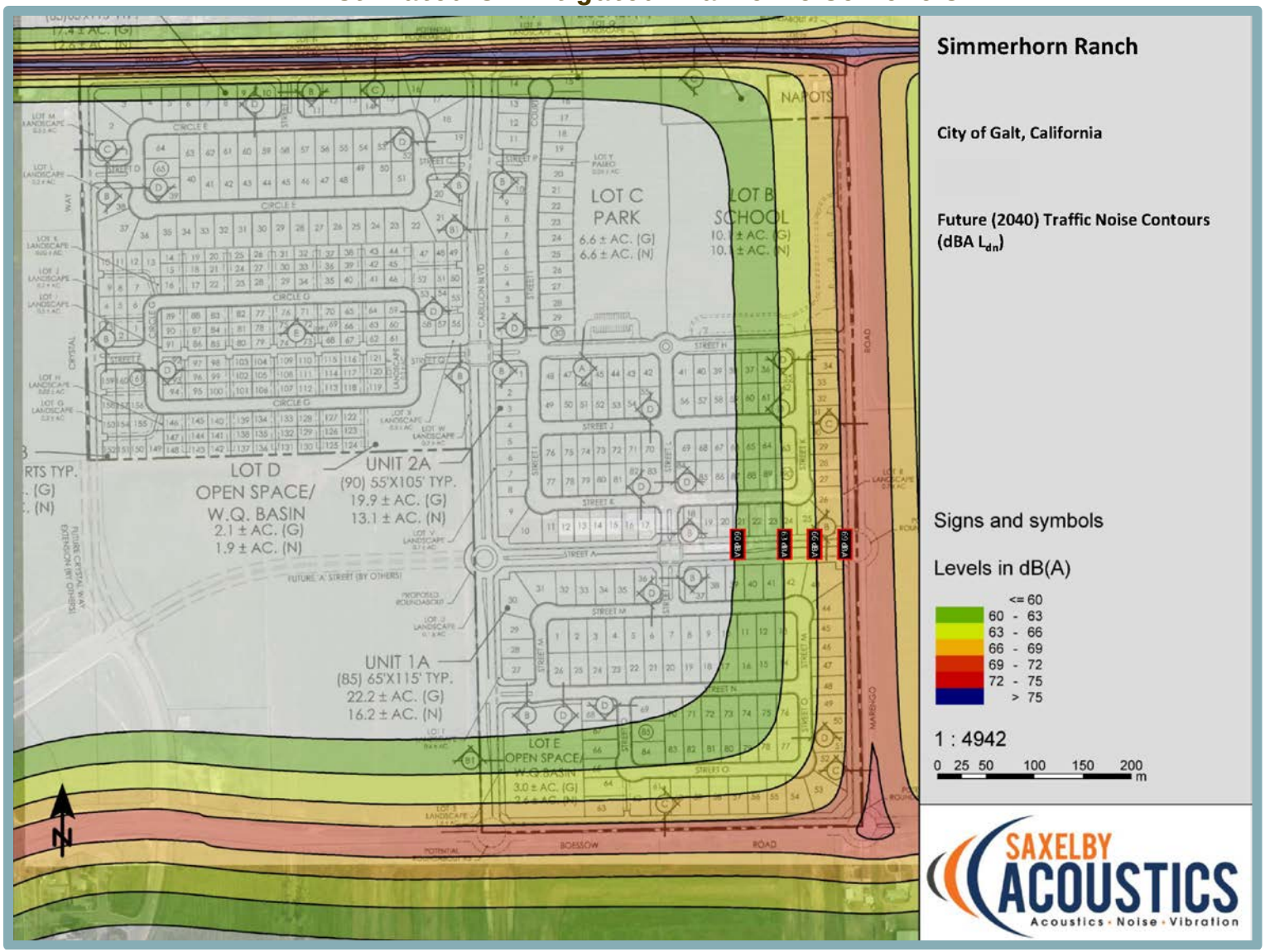
As shown on Figure 14, the eastern boundary of the project site is predicted to be exposed to exterior noise levels up to approximately 69 dBA L_{dn}. The estimated level would exceed the 60 dB normally acceptable limit for residential land use but would not exceed the City's conditionally acceptable limit of 70 dBA L_{dn}.

Table 9
Predicted Traffic Noise Level and Traffic Noise Level Increases

Roadway	Segment	Predicted Exterior Noise Level					
		Existing No Project	Existing Plus Project	Change	2040 No Project	2040 Plus Project	Change
Simmerhorn Rd.	East of Hwy. 99	56.7	57.2	0.4	61.8	62.0	0.1
Simmerhorn Rd.	Carillion Blvd. to Marengo Rd.	55.9	56.5	0.6	62.7	62.9	0.1
Simmerhorn Rd.	West of Carillion Blvd.	54.9	55.1	0.2	61.4	61.4	0.0
Simmerhorn Rd.	East of Marengo Rd.	55.7	55.8	0.1	62.8	62.8	0.0
Marengo Rd.	North of Simmerhorn Rd.	64.2	65.7	1.5	65.9	66.7	0.8
Marengo Rd.	South of Simmerhorn Rd.	61.1	61.6	0.4	66.4	66.6	0.1
Marengo Rd.	Boessow Rd. to Simmerhorn Rd.	61.5	62.7	1.3	63.0	63.3	0.3
Boessow Rd.	East of Crystal Way	64.2	64.9	0.7	72.0	72.1	0.2
Boessow Rd.	East of Marengo Rd.	60.8	61.2	0.4	67.9	68.0	0.2
Boessow Rd.	West of Marengo Rd.	58.7	58.8	0.1	64.8	64.8	0.1
Carillion Blvd.	North of Walnut Ave.	57.8	58.0	0.2	60.7	60.7	0.1
Carillion Blvd.	South of Walnut Ave.	63.9	64.0	0.1	65.8	65.9	0.1
Walnut Ave.	East of Carillion Blvd.	63.6	64.5	1.0	66.9	67.1	0.2
Walnut Ave.	West of Carillion Blvd.	64.5	64.5	0.0	65.7	65.7	0.0
A Street	West of Hwy. 99	58.1	58.1	0.0	60.3	60.4	0.1
C Street	West of Fairway Dr.	66.0	66.0	0.0	66.2	66.2	0.0

Source: Saxelby Acoustics, 2020

Figure 14
Estimated Unmitigated Traffic Noise Levels



Source: Saxelby Acoustics, 2020.

Furthermore, the project would not exceed the normally acceptable level for schools and parks. Without the inclusion of mitigation for the residential uses, exterior areas of future residences on-site could be exposed to noise levels in excess of the City's normally acceptable. In order to reduce noise levels within the City's normally acceptable levels, the proposed project would be required to include sound walls as specified in the Noise Assessment prepared for the proposed project.

Traffic Noise at New Sensitive Receptors – Interior Areas

Based upon Table 10, new receptors at the Simmerhorn Ranch Project Site would be exposed to exterior noise levels of up to 69 dBA L_{dn} at the ground floor building facades closest to Marengo Road, prior to construction of sound walls. Second floor locations would not benefit from shielding from sound walls and would be exposed to exterior noise levels approximately 2-3 dB higher, or up to 72 dBA L_{dn}.

Modern building construction typically yields an exterior-to-interior noise level reduction of 25 dBA. Therefore, where exterior noise levels are 70 dBA L_{dn}, or less, additional interior noise control measures are not typically required. For the Simmerhorn Ranch Project, exterior noise levels at lots along Marengo Road are predicted to be up to 72 dBA L_{dn}, resulting in an interior noise level of 47 dBA L_{dn} based on typical building construction. Interior noise levels of 47 dBA L_{dn} would exceed the City's 45 dBA L_{dn} interior noise level standard.

Impacts resulting from interior traffic noise levels would be considered potentially significant and would require mitigation.

Park and School Uses

The Simmerhorn Ranch Project includes lots for future school and park uses. Future development on the school and park parcels could cause exterior noise levels to exceed the City's non-transportation noise level standards at new residential receptors located near the school and park parcels. Children playing at neighborhood parks, outdoor recreational fields (softball, soccer, basketball, tennis), and school playgrounds are often considered potentially significant noise sources which could adversely affect adjacent noise-sensitive land uses. Typical noise levels associated with groups of approximately 50 children playing at a distance of 50 feet generally range from 55 to 60 dB L_{eq} and 70-75 dB L_{max}. Park and school activities are anticipated to occur during daytime hours. Therefore, noise levels from the playgrounds would need to comply with the City of Galt exterior noise level standards of 50 dB L_{eq} and 70 dB L_{max} at the nearest residential uses.

Based upon the reference noise level data discussed above, the 50 dB L_{eq} noise contour would be located approximately 160 feet from the center of playgrounds or recreational fields. The 70 dB L_{max} noise contour would extend approximately 90 feet from the center of playground or recreational fields.

Based upon the project site plan, the school facilities would generally be separated by local roadways and the center of the park and school uses would be approximately 160 feet, or more, from the nearest residential uses. Therefore, park and playground-related noise levels would be less than 50 dB L_{eq} and 70 dB L_{max} and additional mitigation would not be required.

Table 10
Future (2040) Noise Levels at Sensitive Receptors

Segment	Approximate Residential Setback (feet)[1]	ADT	Predicted Traffic Noise Levels, dB Ldn[2]					
			No Sound Wall	6' Wall	7' Wall	8' Wall	9' Wall	10' Wall
Simmerhorn Road - West of Carillion Blvd.	65	5,710	64	58	57	56	55	54
Simmerhorn Road - East of Carillion Blvd.	65	6,810	65	59	58	57	55	55
Marengo Road - South of Simmerhorn Road	65	16,800	69	63	62	61	59	58
Boessow Road - West of Marengo Road	65	4,550	63	57	56	55	54	53

Notes:
1 Setback distances are measured in feet from the centerlines of the roadways to the center of residential backyards.
2 The modeled noise barriers assume flat site conditions where roadway elevations, base of wall elevations, and building pad elevations are approximately equivalent. Sound wall height may be achieve d through the use a wall and earthen berm to achieve the total height (i.e. 6-foot wall on 2-foot berm is equivalent to an 8-foot tall wall).

Source: Saxelby Acoustics, 2020.

Conclusion

Based on the above, operation of the Simmerhorn Ranch Project would not result in the generation of a substantial permanent increase in ambient noise levels in the vicinity of the Simmerhorn Ranch Project Site in excess of standards established in the City's General Plan and the Municipal Code. However, construction noise could result in a significant impact, should activities occur outside the normal daytime hours. Additionally, noise levels at the proposed residences could exceed the City's exterior and interior noise standards. Therefore, considering the potential for construction noise as well as exterior and interior environments to experience noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, a ***potentially significant*** impact could occur.

Mitigation Measure(s)

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

Simmerhorn Ranch

XIII-1. *Prior to approval of project improvement plans, the Improvement Plans for the proposed project shall show that the first-row lots shall be shielded from Simmerhorn Road, Marengo Road, and Boessow Road through the use of 6-9 foot tall masonry sound walls, as recommended in the Noise Analysis prepared for the proposed project, per the approval of the City Engineer. Other types of barrier may be employed but shall be reviewed by an acoustical engineer prior to being constructed.*

XIII-2. *Prior to issuance of building permits, the applicant shall provide a detailed analysis of interior noise control measures. The analysis should be prepared by a qualified noise control engineer and shall outline the specific measures required to meet the City's 45 dBA Ldn interior noise level standard. Such measures shall be required for Lots bordering Marengo Road. Implementation of the appropriate construction techniques and noise control measures shall be shown on building plans for the proposed project, and such plans shall be reviewed by the City Engineer.*

Simmerhorn Ranch/Non-Participating Properties

XIII-3. *Construction activities shall comply with the City of Galt Noise Ordinance and shall be limited to the hours set forth below:*

Monday-Friday	*6:00 AM to 8:00 PM*
Saturday and Sunday	*7:00 AM to 8:00 PM*

These criteria shall be included in the grading plan submitted by the applicant/developer for review and approval of the Public Works Department prior to issuance of grading permits. Exceptions to allow expanded construction activities shall be reviewed on a case-by-case basis as determined by the Chief Building Official and/or City Engineer.

XIII-4. *Construction activities shall adhere to the requirements of the City of Galt with respect to hours of operation, muffling of internal combustion engines, and other factors that affect construction noise generation and its effects*

on noise-sensitive land uses. Prior to issuance of grading permits, these criteria shall be included in the grading plan submitted by the applicant/developer for the review and approval of the Public Works Department.

XII-5. *During construction, the applicant/developer shall designate a disturbance coordinator and conspicuously post this person's number around the project site and in adjacent public spaces. The disturbance coordinator will receive all public complaints about construction noise disturbances and will be responsible for determining the cause of the complaint, and implement feasible measures to be taken to alleviate the problem. The disturbance coordinator shall report all complaints and corrective measures taken to the Community Development Director.*

b. **Non-Participating Properties**

The proposed project does not include development within the Non-Participating Properties. As such, the proposed project would not result in any construction-related vibrations associated with the Non-Participating Properties, nor would the project result in increased operational vibrations associated with the Non-Participating Properties. Future development of the Non-Participating Properties has been anticipated within the General Plan EIR, and should development occur within the Non-Participating Properties subsequent to approval of the proposed project, vibration related impacts resulting from such development would not exceed the levels previously analyzed in the City's General Plan EIR.

Simmerhorn Ranch

Similar to noise, vibration involves a source, a transmission path, and a receiver. However, noise is generally considered to be pressure waves transmitted through air, whereas vibration usually consists of the excitation of a structure or surface. As with noise, vibration consists of an amplitude and frequency. A person's perception to the vibration depends on their individual sensitivity to vibration, as well as the amplitude and frequency of the source and the response of the system which is vibrating.

Vibration is measured in terms of acceleration, velocity, or displacement. A common practice is to monitor vibration in terms of peak particle velocities (PPV) in inches per second (in/sec). Standards pertaining to perception as well as damage to structures have been developed for vibration levels defined in terms of PPV. 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. Table 11, which was developed by the California Department of Transportation (Caltrans), shows the vibration levels that would normally be required to result in damage to structures. As shown in the table, the threshold for architectural damage to structures is 0.20 in/sec PPV and continuous vibrations of 0.10 in/sec PPV, or greater, would likely cause annoyance to sensitive receptors.

Table 11
Effects of Vibration on People and Buildings

PPV		Human Reaction	Effect on Buildings
mm/sec	in/sec		
0.15 to 0.30	0.006 to 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 to 15	0.4 to 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: Caltrans. Transportation Related Earthborne Vibrations. TAV-02-01-R9601. February 20, 2002.

The primary vibration-generating activities associated with the Simmerhorn Ranch Project would occur during construction when activities such as grading, utilities placement, and parking lot construction occur. Table 12 shows the typical vibration levels produced by construction equipment at various distances. The most substantial source of groundborne vibrations associated with project construction would be the use of vibratory compactors.

Table 12
Vibration Levels for Various Construction Equipment

Type of Equipment	PPV at 25 feet (in/sec)	PPV at 50 feet (in/sec)
Large Bulldozer	0.089	0.031
Loaded Trucks	0.076	0.027
Small Bulldozer	0.003	0.001
Auger/drill Rigs	0.089	0.031
Jackhammer	0.035	0.012
Vibratory Hammer	0.070	0.025
Vibratory Compactor/roller	0.210 (less than 0.20 at 26 feet)	0.074

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Guidelines, May 2006.

With the exception of vibratory compactors, the Table 12 data indicate that construction vibration levels anticipated for the project are less than the 0.2 in/sec threshold at distance of 26 feet. The proposed project construction would occur at distances greater than 26 feet from the nearest single-family residential uses. It should be noted that the nearest single-family residential uses are within the Non-Participating Properties.

Conclusion

Based on the above, the proposed project would not expose people to or generate excessive groundborne vibration or groundborne noise levels and a ***less-than-significant*** impact would occur.

c. **Non-Participating Properties/Simmerhorn Ranch**

The nearest airport to the site is the Bottimore Ranch Airport, located approximately 2.9 miles northeast of the site. The site is not covered by an existing airport land use plan. Given that the project site is not located within two miles of a public or private airport, the proposed project would not expose people residing or working in the project area to excessive noise levels associated with airports. Thus, ***no impact*** would occur.

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

Discussion

a. The proposed project would include annexation of the 338-acre East Galt Infill Annexation Area into the City of Galt and development of the 119.6-acre Simmerhorn Ranch Project Site with 429 single-family residences. The following sections discuss the impacts to population and housing that could result from annexation of the Non-Participating Properties and development of the Simmerhorn Ranch Project Site.

Non-Participating Properties

The Non-Participating Properties would retain the current General Plan land use designations and development of the Non-Participating Properties is not proposed at this time. However, should development occur within the Non-Participating Properties in the future, the project applicant would be required to comply with relevant regulations and policies governing population and housing. Considering that the Non-Participating Properties have been assigned land use designations in the City's General Plan, future development of the Non-Participating Properties has been planned and the proposed project would not induce substantial unplanned population growth in the Non-Participating Properties.

Simmerhorn Ranch

The Simmerhorn Ranch Project would include the construction of 429 residential units on a 119.6-acre site. Using the City of Galt average persons per household value for single-family uses of 3.27, the proposed projects addition of 429 single-family residential units would result in approximately 1,403 new residents.[32] The Department of Finance estimates the 2019 population of Galt, based on the 2010 Census, to be approximately 26,489.[33] It should be noted that population growth itself does not constitute an environmental impact; rather, increased demands on the physical environment resulting from increases in population are considered environmental impacts. Physical environmental effects associated with development of the proposed project area evaluated throughout this IS.

A General Plan Amendment would be required in order to develop the pattern of uses included in the Simmerhorn Ranch Project. However, as discussed throughout this IS, the General Plan Amendment would not introduce any new or previously unplanned uses to the site, but would rather serve to redistribute those uses that were anticipated for the site

[32] City of Galt. *Community Profile: City of Galt Demographic Overview.* Available at: http://www.ci.galt.ca.us/city-departments/economic-development/community-profile. Accessed December 2019.

[33] California Department of Finance. *E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2019, with 2010 Benchmark.* Available at: http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/. Accessed December 2019.

by the City's General Plan. Furthermore, as discussed in Section XVIII, Utilities and Services Systems, of this IS, adequate utility infrastructure and services exist to meet the additional demands that would be created by the Simmerhorn Ranch Project. Similarly, as discussed in Section XIV, Public Services, public service providers such as local police and fire departments would be capable of accommodating the demands of the Simmerhorn Ranch project.

LAFCo has requested that further analysis and discussion regarding the extent to which the proposed project would contribute to environmental justice. The City of Galt currently does not have an ordinance addressing environmental justice. Furthermore, the analysis of environmental justice is not required by CEQA. Regardless, the proposed project would not result in environmental injustice with respect to public services.

Conclusion

Based on the above, development within the Non-Participating Properties is not proposed at this time, but such development has been anticipated by the City's General Plan and General Plan EIR. Furthermore, development of the Simmerhorn Ranch Project Site for the uses proposed has been generally anticipated in the City's General Plan and analyzed in the General Plan EIR. Consequently, the proposed project would not induce substantial population growth in an area, either directly or indirectly, and a ***less-than-significant*** impact would occur.

b. **Non-Participating Properties**

Residential and agricultural uses currently exist within the Non-Participating Properties. The proposed project would not involve any changes to the existing uses. Thus, the proposed project would not result in the displacement of substantial numbers of people or the need to construct replacement housing due to annexation of the Non-Participating Properties.

Simmerhorn Ranch

The Simmerhorn Ranch Project Site currently contains two rural residences, both of which would remain with implementation of the proposed project. Consequently, the proposed project would not result in the displacement of substantial numbers of people or the need to construct replacement housing due to implementation of the Simmerhorn Ranch Project.

Conclusion

Based on the above, the proposed project would not displace any residences within the East Galt Infill Annexation Area. Accordingly, implementation of the proposed project would not necessitate the construction of replacement housing elsewhere, and impacts would be considered ***less than significant***.

XV. PUBLIC SERVICES. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:*	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Fire protection?	☐	☐	✖	☐
b. Police protection?	☐	☐	✖	☐
c. Schools?	☐	☐	✖	☐
d. Parks?	☐	☐	✖	☐
e. Other Public Facilities?	☐	☐	✖	☐

Discussion

a. **Non-Participating Properties/Simmerhorn Ranch**

The proposed project site is located within the jurisdiction of the Cosumnes Community Services District Fire Department (CCSDFD). The CCSDFD operates eight fire stations to serve the cities of Galt and Elk Grove, as well as areas of unincorporated Sacramento County covering a total of approximately 157 square miles. The CCSDFD currently staffs 177 personnel which includes 175 full-time and two part-time employees. Two fire stations are located in the City of Galt: Fire Station 45 at 229 Fifth Street and Fire Station 46 at 1050 Walnut Avenue. Fire Station 45 is located approximately 0.77-mile from the project site to the southwest, and Fire Station 46 is located approximately 1.00-mile to the north.

The increase in the overall demand on fire and police protection services associated with buildout of the City of Galt has been previously anticipated by the City and analyzed in the General Plan EIR. The General Plan EIR found that buildout of the General Plan would increase the need for fire protection services and result in a significant and unavoidable impact. However, as identified in the City's Municipal Services Review, the CCSDFD has a Strategic Plan to help guide mid- and long-term planning efforts for facility siting and operation. Therefore, the Strategic Plan would ensure that the CCSDFD has adequate facilities and operations capacity to support the proposed project.

Additionally, any development within the East Galt Infill Annexation Area, including the currently proposed Simmerhorn Ranch Project and any potential future development in the Non-Participating Properties, would adhere to Chapter 15.28, the Fire Code, of the Municipal Code, which requires that projects install a fire sprinkler system and adhere to all fire protection codes established by the CCSDFD. The above features would reduce the risk of fire at the project site, and, thus reduce potential for the project to increase demand. In addition, the applicant for the Simmerhorn Ranch Project and any future development within the Non-Participating Properties would be required to pay all applicable fees, including a development impact fee and public safety fee. The payment of fees would ensure that adequate fire services would be available to serve the proposed project, and the proposed project would not require the construction of new or physically altered fire protection facilities, the construction of which could cause an environmental impact. Thus, the proposed project would result in a ***less-than-significant*** impact.

b. **Non-Participating Properties/Simmerhorn Ranch**

The Galt 2030 General Plan EIR determined that the increased cost to maintain equipment and facilities and to train and equip personnel would be offset through the increased revenue, and fees, generated by increased development. The applicant for the Simmerhorn Ranch Project, and any future development within the Non-Participating Properties, would be required to pay all applicable fees, including a development impact fee and public safety fee. Given that the project site has been anticipated for urban development, the increase in police protection services has been analyzed in the City's General Plan EIR. Furthermore, the City of Galt General Plan includes the Public Facilities and Services Element to establish goals and policies for the City. The General Plan ensures that emergency response equipment and personnel training are adequate to follow the procedures contained within the City's Emergency Operations Plan. Therefore, the proposed project would not result in the need for new or physically altered police protection facilities, the construction of which could cause an environmental impact, and a ***less-than-significant*** impact would occur.

c. **Non-Participating Properties/Simmerhorn Ranch**

The proposed project includes the development of 429 single-family residences, a park, and a school site within the Simmerhorn Ranch Site, but would not result in any changes to the Non-Participating Properties. The project site is served by the Galt Joint Union Elementary School District (GJUESD) which operates middle and elementary schools within the City, as well as the Galt Joint Union High School District which operates the high schools. According to the Galt 2030 General Plan Existing Conditions, Galt High School and GJUESD were exceeding capacity; however, funding for school facilities is provided through State and local revenue sources, and recent discussions with the GJUESD have indicated that the existing schools in the project area are not at capacity.[34] The proposed residences within the Simmerhorn Ranch Project would be anticipated to generate new students. As shown in Table 13, the Simmerhorn Ranch Project would generate approximately 369 total students.

Table 13
Simmerhorn Ranch Project Student Generation

Grade	Number of Units	Students/Unit Rate[1]	Number of Students
K-5	429	0.48	206
6-8	429	0.17	73
9-12	429	0.21	90
Total	429	0.86	369

[1] Source: School Facility Needs Analysis, September 2011.

Funding for new school construction is provided through State and local revenue sources. Senate Bill (SB) 50 (Chapter 407, Statutes of 1998) governs the amount of fees that can be levied against new development. Payment of fees authorized by the statute is deemed "full and complete mitigation." These fees would be used in combination with State and other funds to construct new schools. The applicant for development within the Simmerhorn Ranch Site, and any future applicants for development within the Non-Participating Properties, would be required to pay development impact fees in order to fund new facilities.

[34] GHD, Inc. *Simmerhorn Ranch Traffic Impact Study*. November 6, 2019.

Furthermore, the Simmerhorn Ranch Project includes designation of a ten-acre site within the Simmerhorn Ranch Project Site for development of a future elementary school. Although plans have not yet been finalized for development of the future school within the Simmerhorn Project Site, the impacts of the development of a school have been analyzed throughout the relevant technical sections of this IS. The payment of development impact fees and designation of the ten-acre school site would be sufficient to ensure adequate school capacity is provided and a ***less-than-significant*** impact would occur.

d. **Non-Participating Properties/ Simmerhorn Ranch**

The proposed project would not result in any changes to the Non-Participating Properties that would increase the demand for parks or recreation facilities from the existing developments.

Using an average persons per household value of 3.27 per residential unit, the Simmerhorn Ranch Project would generate a population of 1,403 persons. The 2030 Galt General Plan requires five acres of parkland per 1,000 residents; therefore, the project would be required to supply 7.02 acres of parkland. The Simmerhorn Ranch Project would include provision of a 6.5-acre park. Thus, the proposed project would be subject to compliance with Section 18.64.080B of Galt's Municipal Code, which requires the applicant to pay a fee in-lieu of land dedication for the remaining acreage.

Similarly, any future development within the Non-Participating Properties would be subject to the City's Municipal Code requirements, and would either provide on-site parkland or be subject to in-lieu fees.

Although the proposed project would result in an increase in population within the City, the project would not result in a substantial loss of parkland. Designation of parkland within the Simmerhorn Ranch Project Site as well as payment of in-lieu fees at the time of development would be considered sufficient to ensure that adequate public parkland is provided for future residents, and a ***less-than-significant*** impact would occur.

e. The Galt 2030 General Plan anticipates increased demand for public facilities with growth in the City of Galt. Both the Non-Participating Properties as well as the Simmerhorn Ranch Project Site are designated for development. Development of the Non-Participating Properties is not proposed at this time; however, upon annexation into the City, the City would be responsible for providing public and governmental facilities to the existing residents within the Non-Participating Properties. Furthermore, implementation of the Simmerhorn Ranch Project would result in an increase in demand for public and governmental facilities through the development of new residences. Considering the provision of an on-site park as well as a school, and the existence of public and governmental facilities within the City, the proposed project would not be anticipated to result in the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service for any other public services.

In addition, LAFCo has requested that further analysis and discussion regarding the extent to which the proposed project would contribute to environmental justice, shall be provided. The CKH states in Government Code Section 56668(o) that "environmental justice" means the fair treatment of people of all races, cultures, and incomes with respect to the location of public facilities and the provision of public services. With approval of the proposed project and annexation into the City of Galt, all public services would be provided to the

project site by the City of Galt. Therefore, the proposed project would not result in environmental injustice with respect to the provision of public services. Therefore, a ***less-than-significant*** impact would occur.

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

Discussion

a,b. **Non-Participating Properties**

As previously discussed, development within the Non-Participating Properties is not proposed at this time. Because development is not proposed within the Non-Participating Properties, population growth would not occur and the proposed project would not result in increased use of parks or recreation facilities due to the annexation of the Non-Participating Properties. Future development within the Non-Participating Properties has been anticipated in the City's General Plan, and potential physical effects on the environment resulting from the provision of parks and recreation facilities sufficient to serve any potential future development has been analyzed in the City's General Plan EIR. Moreover, should development occur within the Non-Participating Properties, development would be required to provide on-site parkland or be required to pay the City's in-lieu fees.

Simmerhorn Ranch

Approximately 429 units, a park, and a school site would be developed on the Simmerhorn Ranch Project Site. Using an average persons per household of 3.27 per residential unit, the Simmerhorn Ranch population would be approximately 1,403 residents. As noted previously the Simmerhorn Ranch Project Site would include a 6.5-acre park. Given that the Simmerhorn Ranch Project would result in approximately 1,403 residents, the Simmerhorn Ranch Project would be required to dedicate at least 7.02 acres of parkland. As such, the Simmerhorn Ranch Project would not include an adequate amount of dedicated parkland and would be subject to the payment of in-lieu fees. Additionally, as discussed throughout this IS, construction of the proposed park would not have a significant adverse effect on the environment. It should be noted that although the Simmerhorn Ranch Project includes amendments to the General Plan, the proposed amendment would only shift land uses within the site, and would not introduce any new or more dense land uses. Therefore, provision of park and recreation facilities adequate to serve the future population of the Simmerhorn Ranch Project Site as well as potential physical effects to the environment, including those effects related to increased use of recreational facilities, have been analyzed in the City's General Plan EIR.

Conclusion

The proposed project would not result in increased use of existing recreational facilities beyond what has been previously anticipated in the City's General Plan EIR. Furthermore, development of park facilities within the Simmerhorn Ranch Project Site has been analyzed throughout this IS. All environmental impacts have been determined to be less-

than-significant with or without implementation of mitigation. Therefore, a ***less-than-significant*** impact would occur.

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

Discussion

a. GHD, Inc. prepared a Traffic Impact Study (TIS) to analyze the potential impacts related to the circulation system and alternative modes of transportation associated with implementation of the proposed project (see Appendix E).[35] For the purposes of the TIA, the proposed project included annexation of the entire East Galt Infill Annexation Area as well as development within the Simmerhorn Ranch Project Site. The results of the TIA are discussed in the following sections.

Project Study Intersections and Scenarios

The TIS included evaluation of the following study intersections:

1. Carillion Boulevard/Walnut Avenue;
2. Simmerhorn Road/Lincoln Way;
3. SR 99 Southbound Ramps/Elm Avenue/Lincoln Way;
4. SR 99 Northbound Ramps/Simmerhorn Road;
5. Carillion Boulevard/Simmerhorn Road;
6. Marengo Road/Simmerhorn Road;
7. SR 99 Southbound Off-Ramp/A Street;
8. SR 99 Northbound On-Ramp/A Street;
9. Fairway Drive/C Street;
10. SR 99 Northbound Off-Ramp/C Street/Boessow Road;
11. Crystal Way/Boessow Road;
12. SR 99 Southbound On-Ramp/Fairway Drive;
13. Marengo Road/Boessow Road;
14. SR 99 Northbound Ramps/Crystal Way;
15. Carillion Boulevard/Boessow Road (Future);
16. A Street/Crystal Way (Future);
17. Carillion Boulevard/A Street (Future); and
18. Marengo Road/A Street (Future).

As indicated among the above intersections, seven intersection are at ramp termini with SR 99. These intersections were included to meet the requirement of the Caltrans Traffic Impact Study Guidelines. In addition, based on comments from Caltrans, SR 99 ramp merge, diverge, and weave operations were evaluated in terms of density and LOS for the analysis scenarios at the following locations:

[35] GHD, Inc. *Simmerhorn Ranch Traffic Impact Study*. November 6, 2019.

1. SR 99 Northbound/Crystal Way Off-Ramp;
2. SR 99 Northbound Auxiliary lane (weave analysis) between Crystal Way and Boessow Road;
3. SR 99 Northbound Auxiliary lane (weave analysis) between A Street and Simmerhorn Road;
4. SR 99 Northbound/Simmerhorn Road On-Ramp;
5. SR 99 Southbound/Elm Avenue Off-Ramp;
6. SR 99 Southbound Auxiliary lane (weave analysis) between Elm Avenue and A Street; and
7. SR 99 Southbound Auxiliary lane (weave analysis) between Fairway Drive On-Ramp and Fairway Drive (South) Off Ramp.

The study intersections were evaluated for the following five scenarios:

- Existing Conditions – The existing traffic operations at the study locations using Year 2019 peak hour traffic counts and intersection configurations.
- Existing Plus Project – Existing traffic volumes plus trips from the proposed project.
- Cumulative Conditions – This scenario includes year 2040 cumulative volumes based on planned and approved projects and the most recent release of the Citywide Travel Demand Model.
- Cumulative Plus Project Conditions – This scenario includes year 2040 cumulative volumes based on the most recent release of the Citywide Travel Demand Model plus the trips from the proposed project.
- Cumulative Plus Project with Road Diet Conditions – This scenario includes all of the assumptions used in the Cumulative Plus Project Condition, but assumes the implementation of all recommendations proposed in the *Carillion Boulevard Complete Street Corridor Study*. The improvements included in the Corridor Study are hereby referred to as the "Road Diet."

Traffic operations were quantified through the determination of LOS. LOS is a qualitative measure of traffic operating conditions, whereby a letter grade "A" through "F" is assigned to an intersection, or roadway segment, representing progressively worsening traffic conditions. LOS "A" represents free-flow operating conditions and LOS "F" represents over-capacity conditions. LOS was calculated for all intersection control types, and freeway ramp merge, diverge, and weave sections using the methods documented in the Transportation Research Board Publication *Highway Capacity Manual, Sixth Edition, A Guide for Multimodal Mobility Analysis, 2016* (HCM 6). Traffic counts at the study intersections were variously conducted in February and October of 2017, February of 2018, and May of 2019 at times when local schools were in session.

Significance Criteria

The Galt 2030 General Plan Circulation Element specifies minimum Level of Service (LOS) standards for all streets and intersections within the City of Galt's jurisdiction in Policy C-1.3, Level of Services. Policy C-1.3 requires that roadway systems shall be developed and managed to maintain LOS "E" on all streets and intersections within a quarter-mile of State Routes, along A Street and C Street between SR 99 to the railroad tracks, and along Lincoln Way between Pringle Avenue to Meladee Lane. A LOS "D" or better shall be developed on all other streets and intersections.

In addition to the City of Galt standards discussed above, GHD also relied on Caltrans' Guide for the Preparation of Traffic Impact Studies, which contains policies pertaining to LOS standards within Caltrans jurisdiction. Caltrans policies states that their target is to maintain LOS at the transition between LOS "C" and LOS "D" on State highway facilities; however, Caltrans further acknowledges that this may not be feasible at all locations and further recommends that lead agencies consult with Caltrans to determine appropriate target LOS.

Non-Participating Properties

The Non-Participating Properties would retain the currently adopted General Plan land use designations and development of the Non-Participating Properties is not proposed as part of the project. Therefore, impacts related to existing and proposed intersections would not occur associated with annexation of the Non-Participating Properties. Any potential future development within the Non-Participating Properties would occur in compliance with the existing General Plan land use designations for the Non-Participating Properties; thus, such potential future development would be inherently included in the growth assumptions used by GHD for this analysis.

Simmerhorn Ranch

The following sections present a discussion of the estimated amount of vehicle trips generated by the Simmerhorn Ranch Project and the results of GHD's impact analysis. It should be noted that GHD's analysis included the proposed amendment to the Circulation Element of the City's General Plan that is included in the Simmerhorn Ranch Project. Thus, any impacts resulting from the proposed General Plan Amendment related to the realignment of A Street have been included in this analysis.

Trip Generation

As part of the TIS, GHD, Inc. estimated the weekday project trip generation for both Existing and Cumulative project conditions. Several important considerations should be noted regarding trip generation. First, the trip generation used in this analysis is based on the site plan dated March 25, 2019, which included 438 dwelling units within the Simmerhorn Ranch Project. Since preparation of the TIS, the Simmerhorn Ranch Project has been revised to include a total of 429 dwelling units. The decrease in the number of units included in the Simmerhorn Ranch Project is not considered substantial enough to result in significant changes to the findings of the TIS. Therefore, the project trip generation remains to be based on 438 dwelling units. The second consideration is that GHD factored in the internal capture rate and level of school enrollment that would occur with inclusion of a school site within the Simmerhorn Ranch Project. Although buildout of the entire residential portion of the Simmerhorn Ranch Project is anticipated to occur under the Existing Condition, the proposed elementary school is anticipated to grow from an enrolment of 200 students under the Existing Condition to an enrolment of 600 students under the Cumulative Condition.

Under the foregoing assumptions, the external trip generation estimates are presented in Table 14 and Table 15 below for Existing and Cumulative conditions respectively.

Table 14
Weekday Project Trip Generation Rates and Estimates: Existing Conditions

Land Use	Trip Rate	ADT	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Single-Family Detached	9.24	3,763	33	183	216	251	143	394
Elementary School	1.89	94	18	16	34	4	5	9
Total Trip Generation		**3,857**	**51**	**199**	**250**	**225**	**148**	**403**

Note: Internal Capture trip pairs are based on a 75 percent internal capture rate, and the lower number of trips shared internally

Source: GHD, Inc., 2019.

Table 15
Weekday Project Trip Generation Rates and Estimates: Cumulative Conditions

Land Use	Trip Rate	ADT	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Single-Family Detached	9.24	3,707	55	172	227	248	140	388
Elementary School	1.89	794	152	161	313	34	37	71
Total Trip Generation		**4,501**	**207**	**333**	**540**	**282**	**177**	**459**

Note: Internal Capture trip pairs are based on a 30 percent internal capture rate, and the lower number of trips shared internally

Source: GHD, Inc., 2019.

Existing Plus Project Conditions

Existing Plus Project conditions refers to the analysis scenario in which project trips generated by the proposed project are compared to the existing traffic volumes. Table 16 below summarizes the peak hour LOS at the study intersections under Existing Plus Project conditions.

As shown in the table, all intersections would operate at an acceptable LOS under Existing Plus Project conditions. Thus, implementation of the proposed project would not exceed the City's thresholds for intersection operations, and, thus would not create a conflict with an adopted plan related to the City's circulation system.

Existing Plus Project weekday AM and PM peak hour ramp and weaving segment operations were quantified by superimposing the additional increments in traffic generated by the proposed project onto existing traffic volumes from ramp-adjacent intersections and Caltrans data. As shown in Table 17, the proposed project would operate below the City's threshold of LOS D under Existing Plus Project conditions. Thus, implementation of the proposed project would not exceed the applicable thresholds for ramp operations, and, thus, would not create a conflict with an adopted plan related to the City's circulation system.

Table 16
Existing Plus Project Conditions Intersection LOS

Intersection	Control	Target LOS	AM Peak Hour		PM Peak Hour	
			Delay[1]	LOS	Delay[1]	LOS
1. Carillion Boulevard / Walnut Avenue	AWSC	D	10.5	B	6.5	A
2. Simmerhorn Road / Lincoln Way	TWSC	E	16.3	C	16.7	C
3. SR 99 SB Ramps / Elm Avenue / Lincoln Way	AWSC	D	18.3	C	16.0	C
4. SR 99 NB Ramps / Simmerhorn Road	TWSC	D	13.1	B	11.8	B
5. Carillion Boulevard / Simmerhorn Road	AWSC	D	19.0	C	12.3	B
6. Marengo Road / Simmerhorn Road	RNDBT	D	6.1	A	5.4	A
7. SR 99 SB Off-Ramp / A Street	Signal	D	7.5	A	7.4	A
8. SR 99 NB On-Ramp/ A Street	Signal	D	11.0	B	9.7	A
9. Fairway Drive / C Street	Signal	D	15.3	B	15.9	B
10. SR 99 NB Off-Ramp / C Street / Boessow Road	Signal	D	14.4	B	12.4	B
11. Crystal Way / Boessow Road	TWSC	E	19.2	C	15.0	B
12. SR 99 SB On-Ramp / Fairway Drive	Signal	D	4.6	A	4.6	A
13. Marengo Road / Boessow Road	RNDBT	D	5.8	A	5.8	A
14. SR 99 NB Ramps / Crystal Way	TWSC	D	9.2	A	9.3	A
15. Carillion Boulevard / Boessow Road	TWSC	D	12.9	B	11.3	B
1. Carillion Boulevard / A Street	TWSC	D	10.4	B	10.8	B
2. Marengo Road/A Street	RNDBT	D	4.2	A	4.2	A

[1] Study intersection #16 does not exist under Existing Plus Project Conditions

Source: GHD, Inc., 2019

Table 17
Existing Plus Project Conditions Ramp LOS

Location	Direction	AM Peak Hour			PM Peak Hour		
		Volume	Density	LOS	Volume	Density	LOS
1. Crystal way Off-Ramp	SR 99 Northbound	5	24.6	C	9	34.1	A
2. Crystal Way to C Street Auxiliary Lane	SR 99 Northbound	1/346	15.9	B	10/448	22.2	C
3. A Street to Simmerhorn Road Auxiliary Lane	SR 99 Northbound	541/171	18.1	B	496/285	23.1	C
4. Simmerhorn Ranch On-Ramp	SR 99 Northbound	151	26.7	C	92	32.4	B
5. Elm Avenue Off-Ramp	SR 99 Southbound	109	25.2	C	241	34.7	B
6. Elm Avenue to A Street Auxiliary Lane	SR 99 Southbound	266/349	17.2	B	179/482	22.7	A
7. C Street to Fairway Drive Auxiliary Lane	SR 99 Southbound	386/35	17.1	B	309/59	20.7	A

[1] Density for each ramp is measured in pc/mi/ln.
[2] The target LOS for each ramp and weaving segment is LOS D.

Source: GHD, Inc., 2019

Cumulative Plus Project Conditions

Cumulative Plus Project conditions refers to the analysis scenario in which projected trips generated by the proposed project are superimposed on 2040 no project traffic volumes, and analyzed using lane geometrics and intersection controls presented in Table 7.1 of the TIS. As shown in Table 18, all intersections would operate at an acceptable LOS during Cumulative Plus Project conditions in the AM and PM peak hours.

Each ramp-adjacent intersection in the project vicinity was also evaluated under Cumulative Plus Project conditions. It should be noted that under Cumulative No Project conditions, the Crystal Way Crystal Way Off-Ramp, Simmerhorn Ranch On-Ramp, and Elm Avenue Off-Ramp would operate at an unacceptable LOS. As shown in Table 19, under Cumulative Plus Project Conditions, the Crystal Way Off-Ramp, Simmerhorn Ranch On-Ramp, and Elm Avenue Off-Ramp would continue to operate at an unacceptable LOS with consideration of additional, project-related vehicle trips. All other ramp and merging segments would operate at an acceptable LOS under Cumulative Plus Project conditions. According to the TIS, the percent difference in density and volume to capacity (v/c) ratio between Cumulative No Project conditions and Cumulative Plus project Conditions is not substantial enough to warrant a significant impact.

Table 18
Cumulative Plus Project Conditions Intersection LOS

Intersection	Control	Target LOS	AM Peak Hour		PM Peak Hour	
			Delay	LOS	Delay	LOS
1. Carillion Boulevard / Walnut Avenue	Signal	D	23.5	C	20.8	C
2. Simmerhorn Road / Lincoln Way	TWSC	E	17.9	C	18.4	C
3. SR 99 SB Ramps / Elm Avenue / Lincoln Way	AWSC	D	28.5	D	17.6	C
4. SR 99 NB Ramps / Simmerhorn Road	RNDBT	D	8.4	A	8.5	A
5. Carillion Boulevard / Simmerhorn Road	Signal	D	25.8	C	22.4	C
6. Marengo Road / Simmerhorn Road	RNDBT	D	8.2	A	8.3	A
7. SR 99 SB Off-Ramp / A Street	Signal	D	10.8	B	10.6	B
8. SR 99 NB On-Ramp/ A Street	Signal	D	14.6	B	12.5	B
9. Fairway Drive / C Street	Signal	D	29.5	C	51.3	D
10. SR 99 NB Off-Ramp / C Street / Boessow Road	Signal	D	46.1	D	26.5	C
11. Crystal Way / Boessow Road	Signal	E	19.9	B	14.7	B
12. SR 99 SB On-Ramp / Fairway Drive	Signal	D	6.4	A	6.3	A
13. Marengo Road / Boessow Road	RNDBT	D	5.9	A	6.0	A
14. SR 99 NB Ramps / Crystal Way	TWSC	D	10.2	B	10.7	B
15. Carillion Boulevard / Boessow Road	Signal	D	19.0	B	21.0	C
16. Crystal Way/A Street	Signal	E	37.7	D	51.6	D
17. Carillion Boulevard / A Street	Signal	D	44.5	D	31.8	C
18. Marengo Road/A Street	RNDBT	D	7.3	A	7.5	A

Source: GHD, Inc., 2019

Table 19
Cumulative Plus Project Conditions Ramp LOS

Location	Direction	AM Peak Hour			PM Peak Hour		
		Volume	Density	LOS	Volume	Density	LOS
1. Crystal way Off-Ramp	**SR 99 Northbound**	**188**	**35.4**	**E**	**103**	**v/c = 1.12**	**F**
2. Crystal Way to C Street Auxiliary Lane	SR 99 Northbound	105 / 720	23.1	C	15 / 794	33.1	D
3. A Street to Simmerhorn Road Auxiliary Lane	SR 99 Northbound	497 / 220	21.2	C	483 / 297	30.0	D
4. Simmerhorn Ranch On-Ramp	**SR 99 Northbound**	**408**	**33.0**	**D**	**362**	**v/c = 1.02**	**F**
5. Elm Avenue Off-Ramp	**SR 99 Southbound**	**218**	**33.2**	**D**	**227**	**40.9**	**E**
6. Elm Avenue to A Street Auxiliary Lane	SR 99 Southbound	302 / 395	22.7	C	314 / 447	28.9	D
7. C Street to Fairway Drive Auxiliary Lane	SR 99 Southbound	713 / 126	26.0	C	640 / 210	31.5	D

[1] Density for each ramp is measured in pc/mi/ln.
[2] The target LOS for each ramp and weaving segment is LOS D.

Source: GHD, Inc., 2019

Cumulative Plus Project Conditions with Road Diet

Cumulative Plus Project Conditions with Road Diet evaluates scenarios in which traffic impacts associated with the project are investigated in comparison to 2040 cumulative conditions. Under Cumulative Plus Project conditions with Road Diet, the following roadway geometry features vary from Cumulative No Project and Cumulative Plus Project conditions.

- Carillion Boulevard is narrowed to two (2) lanes between Twin Cities Road and Boessow Road, with roundabouts located in place of the 2040 No Project (four-lane scenario) intersection controls at the following study intersections:
  - Carillion Boulevard at Walnut Avenue;
  - Carillion Boulevard at Simmerhorn Road;
  - Carillion Boulevard at A Street; and
  - Carillion Boulevard at Boessow Road.

It should be noted that roundabouts at other locations along Carillion Boulevard not analyzed in this study are also assumed to be in place.

The Cumulative Plus Project with Road Diet forecasts were derived from the *Carillion Boulevard Complete Street Corridor Study*. The forecasts were first derived for 2040 "No Project" with the road diet, to check for consistency and balancing between the study intersections, and then the 2040 Project Only traffic volumes were added to obtain the "2040 Plus Project with Road Diet" traffic forecast. As shown in in Table 20, the intersection of SR 99 Southbound Ramps/Elm Avenue at Lincoln Way would operate at unacceptable LOS under Cumulative Plus Project Conditions with Road Diet.

Cumulative Plus Project Conditions with Road Diet weekday AM and PM peak hour ramp and weaving segment operations were also analyzed as part of the TIS. Table 14 below provides a summary of the LOS and density at each location. As shown in Table 21, the location of Crystal Way Off-Ramp, Simmerhorn Ranch On-Ramp, and Elm Avenue Off-Ramp would operate unacceptable LOS under Cumulative Plus Project Conditions with Road Diet. However, because the percent change in density and v/c ratio between Cumulative No Project conditions and Cumulative Plus Project Conditions with Road Diet is minimal, a less-than-significant impact would occur.

Table 20
Cumulative Plus Project Conditions with Road Diet Intersection LOS

Intersection	Control	Target LOS	AM Peak Hour		PM Peak Hour	
			Delay	LOS	Delay	LOS
1. Carillion Boulevard / Walnut Avenue	RNDBT	D	7.5	A	6.9	A
2. Simmerhorn Road / Lincoln Way	TWSC	E	32.3	D	31.5	D
3. SR 99 SB Ramps / Elm Avenue / Lincoln Way	**AWSC**	**D**	**44.0**	**E**	**36.9**	**E**
4. SR 99 NB Ramps / Simmerhorn Road	RNDBT	D	8.7	A	8.9	A
5. Carillion Boulevard / Simmerhorn Road	RNDBT	D	8.2	A	7.6	A
6. Marengo Road / Simmerhorn Road	RNDBT	D	13.8	B	8.9	A
7. SR 99 SB Off-Ramp / A Street	Signal	D	11.0	B	10.6	B
8. SR 99 NB On-Ramp/ A Street	Signal	D	14.1	B	12.9	B
9. Fairway Drive / C Street	Signal	D	28.7	C	43.6	D
10. SR 99 NB Off-Ramp / C Street / Boessow Road	Signal	D	29.8	C	19.4	B
11. Crystal Way / Boessow Road	Signal	E	20.2	C	15.8	B
12. SR 99 SB On-Ramp / Fairway Drive	Signal	D	6.3	A	6.2	A
13. Marengo Road / Boessow Road	RNDBT	D	6.0	A	6.1	A
14. SR 99 NB Ramps / Crystal Way	TWSC	D	10.2	B	10.2	B
15. Carillion Boulevard / Boessow Road	RNDBT	D	8.9	A	8.6	A
16. Crystal Way/A Street	Signal	E	23.8	C	18.8	B
17. Carillion Boulevard / A Street	RNDBT	D	13.3	B	18.5	B
18. Marengo Road/A Street	RNDBT	D	9.6	A	8.6	A

Source: GHD, Inc., 2019

Table 21
Cumulative Plus Project Conditions with Road Diet Ramp LOS

Location	Direction	AM Peak Hour			PM Peak Hour		
		Volume	Density	LOS	Volume	Density	LOS
1. Crystal way Off-Ramp	**SR 99 Northbound**	**188**	**35.4**	**E**	**203**	**v/c = 1.12**	**F**
2. Crystal Way to C Street Auxiliary Lane	SR 99 Northbound	105 / 710	23.1	C	105 / 784	33.2	D
3. A Street to Simmerhorn Road Auxiliary Lane	SR 99 Northbound	617 / 230	22.6	C	603 / 302	31.4	D
4. Simmerhorn Ranch On-Ramp	**SR 99 Northbound**	**443**	**34.5**	**D**	**402**	**v/c = 1.06**	**F**
5. Elm Avenue Off-Ramp	**SR 99 Southbound**	**218**	**33.2**	**D**	**227**	**40.9**	**E**
6. Elm Avenue to A Street Auxiliary Lane	SR 99 Southbound	302 / 470	22.9	C	314 / 517	29.0	D
7. C Street to Fairway Drive Auxiliary Lane	SR 99 Southbound	713 / 126	25.3	C	635 / 210	30.7	D

[1] Density for each ramp is measured in pc/mi/ln.
[2] The target LOS for each ramp and weaving segment is LOS D.

Source: GHD, Inc., 2019

Transit, Bicycle, and Pedestrian Facilities

The following is a discussion of the regional transit, bicycle, and pedestrian access in existing conditions and with implementation of the proposed project.

Non-Participating Properties

The proposed project would not alter the existing General Plan land use designation of the Non-Participating Properties and development of the Non-Participating Properties is not proposed at this time. As such, impacts related to transit, bicycle, and pedestrian facilities would not occur associated with the Non-Participating Properties.

Simmerhorn Ranch

Discussions of transit facilities as well as bicycle and pedestrian facilities within the Simmerhorn Ranch Project Site are presented below.

Transit Facilities

Public transportation is provided by South County Transit within the City of Galt. South County Transit provided options include Dial-A-Ride, Highway 99 Express, Delta Route, and other modes of public transit. Dial-a-Ride provides curb-to-curb service for individuals within the service area. Existing transit within the City, principally the Dial-a-Ride service, would provide access to several grocery stores, restaurants, banks, and schools in the area. Thus, the proposed project would not conflict with any applicable plans or policies addressing the circulation system.

Bicycle and Pedestrian Facilities

Detailed plans for bicycle facilities within the Simmerhorn Ranch Project Site have not yet been finalized. However, Figure XX presents the conceptual bicycle and pedestrian access plan for the Simmerhorn Ranch Project Site. As shown in Figure XX, bicycle and pedestrian infrastructure would be provided throughout the project site. In particular, buffered bicycle lanes would be provided along Carillion Boulevard, Street A, and the west side of Marengo Road. Where buffered bicycle lanes are not provided, class II bicycle lanes within roadways would be provided. The ultimate design of the proposed infrastructure would be required to comply with the City's Complete Street OrdinanceFurthermore, all streets within the Simmerhorn Ranch Project Site would include the provision of pedestrian sidewalks. Pedestrian crosswalks would be provided at all major intersections; and the design of the proposed extension of Carillion Boulevard would comply with the recommendations presented within the *Carillion Boulevard Complete Street Corridor Study*. The *Carillion Boulevard Complete Street Corridor Study* is intended to reduce vehicle speeds along Carillion Boulevard allowing Carillion Boulevard to better serve multi-modal transportation options, including pedestrian and bicycle traffic.

Considering the above, the Simmerhorn Ranch Project would not conflict with any plans or policies related to bicycle and pedestrian facilities.

Conclusion

As discussed above, the proposed project would not result in impacts related to transit, bicycle, and pedestrian facilities. Under Existing Conditions, project-related vehicle trips would not result in impacts to any intersections or freeway segments. Although certain intersections and freeway facilities would operate unacceptably under the Cumulative No Project Conditions, the additional vehicle volumes resulting from development of the Simmerhorn Ranch Project would not result in substantial degradations of such facilities, and, thus, the Simmerhorn Ranch Project would not result in impacts under the Cumulative No Project Conditions. However, under Cumulative Plus Project Conditions, trips related to the Simmerhorn Ranch Project would result in a significant impact to the intersection of SR 99 Southbound Ramp/Elm Avenue/Lincoln Way. Due to the identified impact to the foregoing intersection, the proposed project could conflict with an applicable plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and a ***potentially significant*** impact could occur.

Mitigation Measure

Implementation of the following mitigation measure would improve the LOS at the intersection of Lincoln Way/SR 99 Southbound Ramps/Elm Avenue and reduce potential impacts to a *less-than-significant* level.

Simmerhorn Ranch

XVII-1. *Prior to issuance of a building permit, the project applicant shall pay the appropriate Transportation Impact Fees (TIF). Proof of payment shall be submitted to the Community Development Department.*

Figure 15
Bicycle and Pedestrian Access

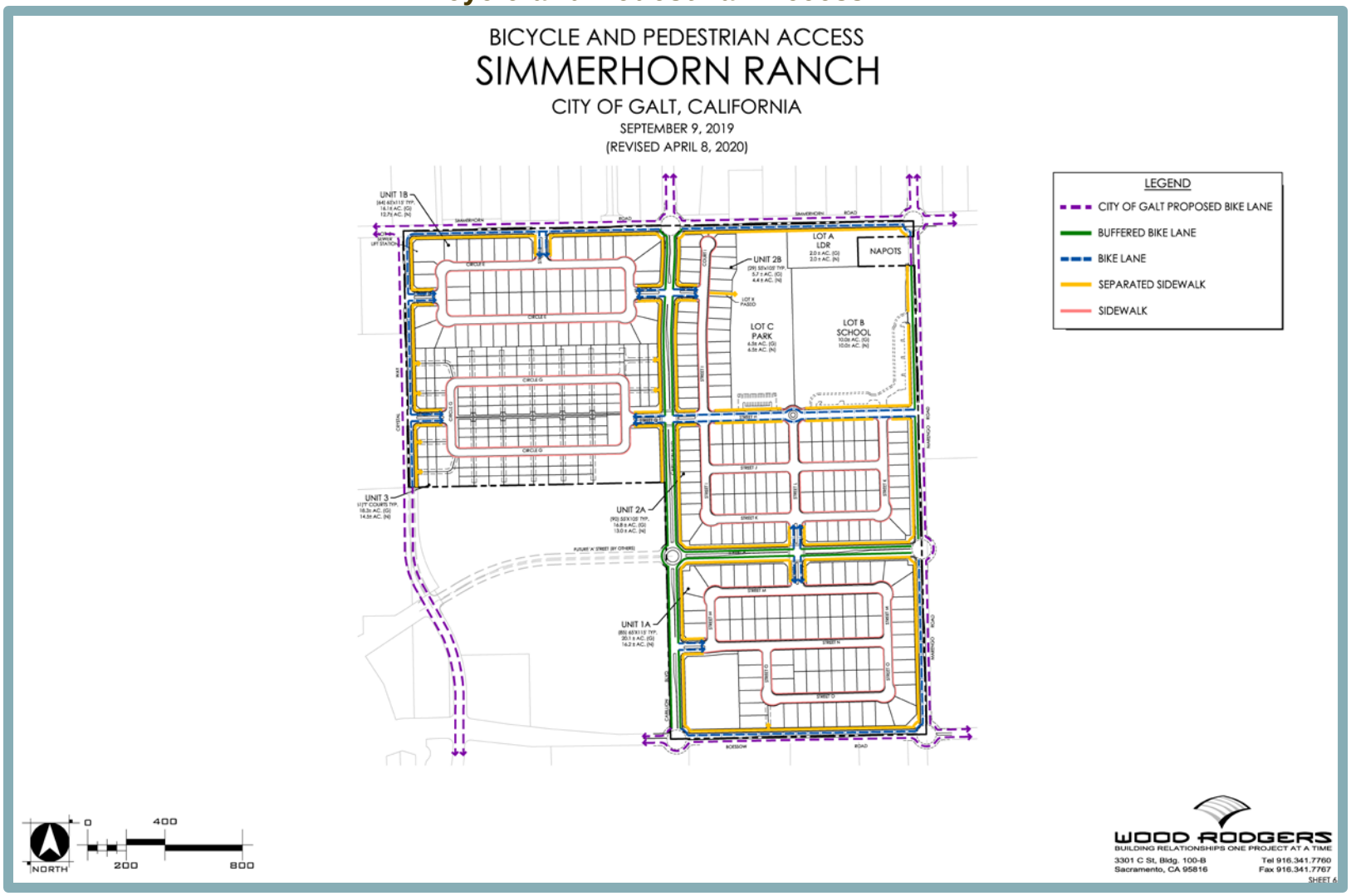


Table 22
Fair Share Calculations for Impacts to SR 99 SB Ramps/Elm Avenue/Lincoln Way

Scenario	AM Peak Volume	PM Peak Volume
Existing Volume	1,048	1,086
Cumulative Plus Project with Road Diet	1,430	1,436
Total Growth	382	350
Project-Generated Growth	25	51
Fair Share Contribution	6.5%	14.6%

b. Section 15064.3 of the CEQA Guidelines provides specific considerations for evaluating a project's transportation impacts. Per Section 15064.3, analysis of vehicle miles traveled (VMT) attributable to a project is the most appropriate measure of transportation impacts. While a qualitative discussion of VMT has been provided below, the provisions of Section 15064.3 apply only prospectively; determination of impacts based on VTM is not required Statewide until July 1, 2020.

Per Section 15064.3(3), a lead agency may analyze a project's VMT qualitatively based on the availability of transit, proximity to destinations, etc. While changes to driving conditions that increase LOS times are an important consideration for traffic operations and management, the method of analysis does not fully describe environmental effects associated with fuel consumption, emissions, and public health. Section 15064.3(3) changes the focus of transportation impact analysis in CEQA from measuring impact to drivers to measuring the impact of driving. A discussion of VMT related to the Non-Participating Properties and Simmerhorn Ranch is discussed in further detail below.

Non-Participating Properties

The proposed project would not alter the existing General Plan land use designation of the Non-Participating Properties and development of the Non-Participating Properties is not proposed at this time. As such, impacts related to VMT would not occur associated with the Non-Participating Properties.

Simmerhorn Ranch

The TIS used CalEEMod to analyze VMT associated with the proposed project. The Sacramento Area of Council of Governments (SACOG) current Household Generated VMT per capita is 17.95. According to the TIS the proposed project would result in approximately 16.56 VMT per capita under existing plus project trip generation conditions. Under Cumulative Plus Project Trip Generation conditions, the proposed project would result in approximately 17.95 VMT per capita. As such, under Existing Plus Project Trip Generation conditions the VMT is lower than the SACOG average and under Cumulative Plus Project Trip Generation conditions the VMT is the same. Additionally, as noted in question 'a' above, the proposed project would include access to public transit and bicycle and pedestrian facilities. The inclusion of pedestrian and bicycle infrastructure would encourage use of alternative means of transportation to and from the project site. In addition, the project would include design of the section of Carillion Boulevard within the Simmerhorn Ranch Project Site in compliance with the guidelines of the *Carillion Boulevard Complete Street Corridor Study*, which would help to reduce vehicle usage and increase active transportation within the Carillion Boulevard corridor. Finally, the method

of analysis employed in the TIS does not necessarily consider some of the inherent site features that would contribute to potentially reduced VMT. For instance, the East Galt Infill Annexation Area is located in close proximity to the Downtown Galt, as well as Chabolla Park and the Galt Market. Residents at the project site would be afforded convenient access to the aforementioned existing amenities, which could contribute to reduced VMT. The extension of Carillion Boulevard would also enhance connectivity within the City, which could further reduce VMT.

Conclusion

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

c. **Non-Participating Properties**

Development within the Non-Participating Properties is not proposed at this time. As such, implementation of the proposed project would not result in any changes to the circulation system within the Non-Participating Properties and would not have the potential to result in substantially increased hazards.

Simmerhorn Ranch

GHD included an analysis of Site Access and Circulation within the TIS prepared for the proposed project. Although the site plans for the Simmerhorn Ranch Project Site have changed slightly since preparation of the TIS, the recommendations within the TIS are considered to remain valid.

In general, the TIS considered the potential for increased internal trip volumes and traffic levels to result in conflicts due to the proposed inclusion of numerous access points along several internal roadway frontages. In particular, the following intersections and roadway features would require specific design considerations in order to ensure safe operations:

- Access to Street C/Street P;
- The intersection of Street H/Street Q at Carillion Boulevard;
- Access to the proposed School site from Marengo Road;
- The intersection of Marengo Road/Street H;
- Extension of the median with Street H to restrict turning movements from Street K and the school site;
- Consolidation of driveways along Street H;
- The intersection of Crystal Way at Simmerhorn Road;
- The intersection of Street D and Crystal Way; and
- The intersections of Street F and Crystal Way as well as Street B and Crystal Way under future development conditions.

The design of the foregoing intersections and roadway features would be subject to review by the City of Galt Public Works Department, and the ultimate configuration of the intersections and roadways features will depend on implementation of other projects within the City, such as the recommendations within the *Carillion Boulevard Complete Street Corridor Study*. However, without implementation of the recommendations included in the GHD Traffic Impact Study, or other equivalent recommendations made by the City's Public Works Department, implementation of the Simmerhorn Ranch Project could result in the creation of hazards.

Conclusion
Based on the above, the implementation of the proposed project could alter the circulation systems that could substantially increase hazards due to a design feature or incompatible uses, and a ***potentially significant*** impact could occur.

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

Simmerhorn Ranch
XVII-2. *Prior to Issuance of grading permits, the project applicant shall submit Improvement Plans that reflect the intersection and roadway feature design recommendations included in the Traffic Impact Study prepared for the proposed project by GHD. Intersection and roadway feature designs within the project site may be altered from the designs recommended by GHD only with the express written consent of the City's Public Works Department. Consistency of the proposed intersection and roadway design features with the recommendations made by GHD or the City's Public Works Department shall be confirmed by the City's Public Works Department and/or the City Engineer prior to issuance of grading permits.*

d. Sufficient emergency access is determined by factors such as number of access points, roadway width, and proximity to fire stations. The proposed project includes three vehicle access points for emergency vehicles. Additionally, all lane widths within the project meet the minimum width that can accommodate emergency vehicles. Emergency access related to the Non-Participating Properties and the Simmerhorn Ranch Project Site are discussed in further detail below.

Non-Participating Properties
Development within the Non-Participating Properties is not proposed at this time. Potential future development of the Non-Participating Properties under the existing General Plan land use designations was previously analyzed within the City of Galt's General Plan EIR. Considering that the proposed project would not result in the alteration of existing land use designations for any of the Non-Participating Properties, any potential impacts related to emergency access resulting from potential future development would be consistent with the analysis presented in the General Plan EIR.

Simmerhorn Ranch
Construction traffic associated with the proposed project would include heavy-duty vehicles which would share the area roadways with normal vehicle traffic, creating potential conflicts with other roadway users, as well as transport of construction material, and daily construction employee trips to and from the site. Although the number of added daily trips would be less than would be generated by the project at completion, the short-term increase in traffic that would occur during the construction phase of the proposed project could temporarily disrupt daily traffic flows on area roadways, including emergency response vehicles in transit.

Conclusion
Based on the above, the Non-Participating Properties would not be subject to development or any other changes. However, the construction traffic associated with

development of the Simmerhorn Ranch Project Site could disrupt daily traffic flows. Therefore, development of the Simmerhorn Ranch Project Site could result in inadequate emergency access, and a ***potentially significant*** impact would occur.

Mitigation Measure(s)

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

Simmerhorn Ranch

XVII-3. *Prior to initiation of construction activities, the project applicant shall prepare a Construction Traffic Management Plan for review and approval by the City Engineer. The plan shall include the following:*

- *A project staging plan to maximize on-site storage of materials and equipment;*
- *A set of comprehensive traffic control measures, including scheduling of major truck trips and deliveries to avoid peak hours; lane closure proceedings; signs, cones and other warning devices for drivers; and designation of construction access routes;*
- *Permitted construction hours;*
- *Designated locations for construction staging areas;*
- *Identification of parking areas for construction employees, site visitors, and inspectors, including on-site locations; and*
- *Provisions for street sweeping to remove construction-related debris on public streets.*

XVIII. TRIBAL CULTURAL RESOURCES. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:*	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k).	☐	✖	☐	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	✖	☐	☐

Discussion

a,b. **Non-Participating Properties**

As discussed in Section V, Cultural Resources, of this IS, for development of the Non-Participating Properties do not currently exist, and, thus, the Non-Participating Properties were not subject to intensive field survey, but instead were evaluated based on available literature.

Considering that development within the Non-Participating Properties is not proposed at this time, the proposed project would not have the potential to result in adverse effects to any tribal cultural resources within the Non-Participating Properties. Future development within the Non-Participating Properties has been analyzed in the City's General Plan EIR, and potential impacts related to development of the Non-Participating Properties following implementation of the proposed project would be similar to what was anticipated within the City's General Plan EIR. Nevertheless, based on the records search and literature review performed by ECORP for the proposed project, potential future development within the Non-Participating Properties could result in impacts to previously unknown tribal cultural resources.

Simmerhorn Ranch

The Simmerhorn Ranch Project Site previously contained structures related to past agricultural and dairy operations. All such structures have been analyzed for eligibility under the CRHR and the NRHP, and were found not to be eligible for listing on either of the foregoing resources or per Public Resources Code section 5020.1(k) or subdivision (c) of Public Resources Code Section 5024.1.

Pursuant with the requirements of AB 52, the City contacted the following tribes: Wilton Rancheria, The Ohlone Indian Tribe, North Valley Yokuts Tribe, Muwekma Ohlone Indian Tribe of the San Francisco Bay Area, Ione Band of Miwok Indians, Indian Canyon Mutsun Band of Costanoan, and Amah Mutsun Tribal Band of Mission, San Juan Bautista. The conact letters were mailed on April 11, 2019. One letter was received from the Wilton

Rancheria within the 30-day response period; the City is working with the Wilton Rancheria to arrange a meeting to further discuss the project.

Although field surveys of the Simmerhorn Ranch Project Site did not identify any tribal cultural resources, the potential for such resources to occur within the project site remains. Consequently, development of the Simmerhorn Ranch Project Site could result in adverse effects to previously unknown tribal cultural resources during ground disturbing activities.

Conclusion

Based on the above, the possibility exists that construction of the Simmerhorn Ranch Project or potential future development within the Non-Participating Properties could result in a substantial adverse change in the significance of a Tribal Cultural Resource if previously unknown cultural resources are uncovered during grading or other ground-disturbing activities. Thus, a ***potentially significant*** impact to tribal cultural resources could occur.

Mitigation Measure(s)

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

Non-Participating Properties/Simmerhorn Ranch

XVIII-1. *Avoidance and preservation in place is the preferred manner of mitigating impacts to tribal cultural resources and will be accomplished by several means, including:*

- *Planning construction to avoid tribal cultural resources, archaeological sites and/ or other resources; incorporating sites within parks, green-space or other open space; covering archaeological sites; deeding a site to a permanent conservation easement; or other preservation and protection methods agreeable to consulting parties and regulatory authorities with jurisdiction over the activity. Recommendations for avoidance of cultural resources will be reviewed by the CEQA lead agency representative, interested Native American Tribes and the 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 area to avoid cultural resources, modification of the design to eliminate or reduce impacts to cultural resources or modification or realignment to avoid highly significant features within a cultural resource. Native American Representatives from interested Native American Tribes will be allowed to review and comment on these analyses and shall have the opportunity to meet with the CEQA lead agency 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 resource can be avoided, the construction contractor(s), with paid Native American monitors from culturally affiliated Native*

American Tribes present, will install protective fencing outside the site boundary, including a buffer area, before construction restarts. 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". Native American representatives from interested Native American Tribes and the CEQA lead agency representative will also consult to develop measures for long term management of the resource and routine operation and maintenance within culturally sensitive areas that retain resource integrity, including tribal cultural integrity, and including archaeological material, Traditional Cultural Properties and cultural landscapes, in accordance with state and federal guidance including National Register Bulletin 30 (Guidelines for Evaluating and Documenting Rural Historic Landscapes), Bulletin 36 (Guidelines for Evaluating and Registering Archaeological Properties), and Bulletin 38 (Guidelines for Evaluating and Documenting Traditional Cultural Properties); National Park Service Preservation Brief 36 (Protecting Cultural Landscapes: Planning, Treatment and Management of Historic Landscapes) and using the Advisory Council on Historic Preservation (ACHP) Native American Traditional Cultural Landscapes Action Plan for further guidance. Use of temporary and permanent forms of protective fencing will be determined in consultation with Native American rrepresentatives from interested Native American Tribes.

XVIII-2 *Develop a standard operating procedure, points of contact, timeline and schedule for the project so all possible damages can be avoided or alternatives and cumulative impacts properly accessed.*

If potential tribal cultural resources, archaeological resources, other cultural resources, articulated, or disarticulated human remains are discovered by Native American Representatives or Monitors from interested Native American Tribes, qualified cultural resources specialists or other Project personnel during construction activities, work will cease in the immediate vicinity of the find (based on the apparent distribution of cultural resources), whether or not a Native American Monitor from an interested Native American Tribe is present. A qualified cultural resources specialist and Native American Representatives and Monitors from culturally affiliated Native American Tribes will assess the significance of the find and make recommendations for further evaluation and treatment as necessary. These recommendations will be documented in the project record. For any recommendations made by interested Native American Tribes which are not implemented, a justification for why the recommendation was not followed will be provided in the project record.

If adverse impacts to tribal cultural resources, unique archeology, or other cultural resources occurs, then consultation with Wilton Rancheria regarding mitigation contained in the Public Resources Code sections 21084.3(a) and (b) and CEQA Guidelines section 15370 should occur, in

order to coordinate for compensation for the impact by replacing or providing substitute resources or environments.

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

Discussion

a-c. **Non-Participating Properties**

Development within the Non-Participating Properties is not proposed at this time. Existing developments within the Non-Participating Properties are currently provided utility services by way of existing connections to infrastructure, or on-site infrastructure such as wells or septic systems. Potential future development of the Non-Participating Properties under the existing General Plan land use designations was previously analyzed within the City of Galt's General Plan EIR. Considering that the proposed project would not result in the alteration of existing land use designations for any of the Non-Participating Properties, any potential impacts related to electricity, natural gas, telecommunications, water, and sanitary sewer from potential future development would be consistent with the analysis presented in the General Plan EIR.

Simmerhorn Ranch

Electricity, natural gas, telecommunications, water, and sanitary sewer services would be provided by way of new connections to existing infrastructure in the immediate project area. Brief discussions of the water, sewer service, stormwater drainage, electrical, natural gas, and telecommunications facilities that would serve the proposed project are included below.

Water

As previously mention under Section X, Hydrology and Water Quality, water service for the proposed project would be provided by the City by way of new connections and extensions to existing water lines

Per the City's 2015 UWMP, the City of Galt relies upon groundwater from the Cosumnes Subbasin of the San Joaquin Valley Groundwater basin as the sole source of domestic potable water for current and future water demand.[36] The Cosumnes Subbasin is managed through the south Basin Groundwater Management plan which was adopted in 2011. Per the 2015 UWMP, the City has eight active wells to extract groundwater from the Cosumnes Subbasin. The wells have capacities ranging from 600 to 1,900 gallons per minute (gpm) with a total capacity of approximately 10,400 gpm. The depth to groundwater is approximately 80 feet to 100 feet with the wells drawing water at depths ranging from 652 feet to 1,539 feet. As discussed in the General Plan EIR, the City can supply all of the water demands with groundwater from the Cosumnes Subbasin through the year 2040, which includes buildout of the General Plan.

According to the 2015 UWMP, the estimated baseline average per capita per day (gpcd) water demand between the years 2000 and 2009 was approximately 217 gallons per day per capita. The 2020 water demand target for the City of Galt is approximately 174 gpcd. Per the 2015 UWMP, the City can supply all of the water demands with groundwater from the Cosumnes Subbasin through the year 2040. Furthermore, the City is projected to have sufficient water supplies to meet projected water needs through 2040 during normal, dry, and multiple dry years. The UWMP notes that water usage could be reduced by over 30 percent should conservation measures be necessary.

Although the Simmerhorn Ranch Project includes a request for General Plan Amendments, the proposed amendments would serve to redistribute land uses that were anticipated for the project site in the City's General Plan, but the proposed General Plan Amendments would not result in increased levels of development within the Simmerhorn Ranch Project Site. Because development of the Simmerhorn Ranch Project Site has been anticipated within the City's General Plan, the 2015 UWMP included increased demand for water resources resulting from development of the Simmerhorn Ranch Project Site. Considering that development of the Simmerhorn Ranch Project Site has been previously anticipated, the increased water demand resulting from implementation of the proposed project can be met within the City's available water supply.

Stormwater Systems

As discussed in Section X, Hydrology and Water Quality, stormwater draining off impervious surfaces such as roofs, parking areas, and drive aisles within the project site would be captured by curb inlets and routed, by way of new underground drain pipes, to stormwater detention basins in the Simmerhorn Ranch Project Site. Treated runoff from the stormwater detention basin would be routed off-site to an existing culvert that leads to Dry Creek. The stormwater treatment system would be design to comply with Sacramento County standards for hydromodification and stormwater quality. Furthermore, Mitigation Measure X-1 would ensure that the project applicant comply with the NPDES general construction permit requirements. Consequently, implementation of the Simmerhorn Ranch Project would include provision of adequate on-site infrastructure, and the existing off-site infrastructure would be sufficient to meet the demand from the Simmerhorn Ranch Project.

[36] City of Galt. *2015 Urban Water Management Plan Update*. June 2016.

Wastewater Treatment

Sewer service would be provided to the Simmerhorn Ranch Project by new connections to existing off-site infrastructure and construction of on-site infrastructure.

The City of Galt's current wastewater treatment collection system approximately 79 miles of sewer mains and trunk sewers. The wastewater is collected through the sewer mains and trunk sewers, then conveyed to the City of Galt's wastewater treatment plant (WWTP), which is located approximately 2.6 miles northwest of the project site. The WWTP has a capacity of 3.0 million gallons per day (mgd) and is currently operating at 2.0 mgd.[37] Thus, the WWTP has a remaining capacity of approximately 1.0 mgd.

A Technical Memorandum was prepared for the Simmerhorn Ranch Project by Wood Rodgers, Inc.[38] Wood Rogers, Inc. calculated the project's design flow and estimated that the on-site peak wet weather flow of 0.52 mgd. Considering the WWTP's remaining capacity, the WWTP maintains enough capacity to treat the peak wet weather flow from the Simmerhorn Ranch Project. In addition, the existing 10-inch sewer line within Simmerhorn Road is sufficiently sized to accommodate project-related flows. As discussed in the Project Description section of this IS, the Simmerhorn Ranch Project would be required to provide an on-site sewer lift station and construct the infrastructure sufficient to connect to the existing 10-inch sewer line within Simmerhorn Road. With implementation of the aforementioned infrastructure, the Simmerhorn Ranch Project would not exceed the capacity of current wastewater infrastructure in the project area.

It should further be noted that the Simmerhorn Ranch Project would result in development of the Simmerhorn Ranch Project Site with the same uses and at the same densities as was anticipated in the City's General Plan. Although the Simmerhorn Ranch Project includes amendments to the General Plan, the wastewater generated by operations of the Simmerhorn Ranch Project have been anticipated within the City's General Plan and wastewater related analyses, such as the City's Sanitary Sewer Management Plan and the City's Wastewater Treatment Plant Facilities Master Plan.

Other Utilities

Electrical utilities would be provided by SMUD, while natural gas utilities would be provided by PG&E by way of connections to existing infrastructure located within the immediate project vicinity. Telecommunications utilities would be provided by way of connections to existing infrastructure located within the immediate project vicinity. The proposed project would not require major upgrades to, or extension of, existing infrastructure. Thus, impacts to electricity, natural gas, and telecommunications infrastructure would be less than significant.

Conclusion

Considering the above, sufficient utility infrastructure exists in the project vicinity to serve the proposed project. Furthermore, the Simmerhorn Ranch Project would include extension of existing infrastructure to provide service to the project site and potential impacts from the extension of such infrastructure has been analyzed throughout this IS. Finally, increased demand for water, sewer, and other utilities resulting from the proposed

[37] City of Galt. *Wastewater Treatment Plant.* Available at: http://www.ci.galt.ca.us/city-departments/public-works/utilities-division/wastewater-services/wastewater-treatment-plant. Accessed April 2020.

[38] Wood Rodgers, Inc. *Subject: Simmerhorn Ranch (119.5 acres) Preliminary Sewer, Water and Storm Drainage Plans*. March 22, 2019.

project can be accommodating by the City's existing utility capacity. Therefore, the project would result in a ***less-than-significant*** impact related to the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

d,e. **Non-Participating Properties/Simmerhorn Ranch**

Solid waste, recyclable materials, and compostable material collection within the City of Galt is operated by California Waste Recovery Systems (CWRS). CWRS is a private franchise that can haul solid waste to any approved landfill facility in the area. The Sacramento County Landfill located on Kiefer Boulevard has been recently expanded. The Sacramento County Landfill covers 1,084 acres of land; 660 acres are permitted for disposal. The sites permit allows the landfill to receive a maximum of 10,815 tons of waste per day. According to the California Department of Resources Recycling and Recovery (CalRecycle), the Sacramento County Landfill has a remaining capacity of 112,900,000 cubic yards out of a total permitted capacity of 117,400,000, or 96 percent remaining capacity.[39]

Development of the Non-Participating Properties is not proposed at this time, and the existing developments are currently served by CWRS. Thus, the proposed project would not result in increased solid waste generation from the Non-Participating Properties.

Development of the Simmerhorn Ranch Project Site has been anticipated by the City's General Plan. Although the Simmerhorn Ranch Project includes General Plan Amendments, the Simmerhorn Ranch Project would be substantively consistent with the level and type of development assumed for the project site. Thus, increased solid waste generation due to development of the Simmerhorn Ranch Project Site has been anticipated in the City's General Plan and potential impacts analyzed in the General Plan EIR.

Because of the Sacramento County Landfill remaining capacity, construction and operation of the Simmerhorn Ranch Project would not result in increased solid waste in excess of the Sacramento County Landfill capacity. In addition, the Simmerhorn Ranch Project would be required to comply with all applicable provisions of Chapter 8.16, Garbage, of the City's Municipal Code.

Therefore, 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 and would comply with federal, State, and local management and reduction statutes and regulations related to solid waste. Therefore, a ***less-than-significant*** impact would occur.

[39] California Department of Resources Recycling and Recovery (CalRecycle). *Facility/Site Summary Details: Sacramento County Landfill (Kiefer) (34-AA-0001)*. Available at: https://www2.calrecycle.ca.gov/swfacilities/Directory/34-AA-0001/. Accessed October 2019.

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

Discussion

a-d. **Non-Participating Properties/Simmerhorn Ranch**

According to the CAL FIRE Fire and Resource Assessment Program, neither the Non-Participating Properties or the Simmerhorn Ranch Project Site are located within or near a state responsibility area or lands classified as Very High Fire Hazard Severity Zone.[40] Furthermore, the Simmerhorn Ranch Project Site would be developed residences and remove the existing grass fields that present a higher fire risk than that of the proposed project. Therefore, the proposed project would not be subject to risks related to wildfires and a ***less-than-significant*** impact would occur.

[40] California Department of Forestry and Fire Protection. *Sacramento County, Very High Fire Hazard Severity Zones in LRA*. July 30, 2008.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE.	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	✖	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	✖	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	✖	☐

Discussion

a. As discussed in Section IV, Biological Resources, of this Initial Study, while a limited potential exists for special-status plants, special-status invertebrates, California tiger salamander, western spadefoot, northwestern pond turtle, western burrowing owl, Cooper's hawk, ferruginous hawk, greater sandhill crane, loggerhead shrike, merlin, northern harrier, song sparrow "Modesto" population, Swainson's hawk, tricolored blackbird, white-tailed kite, American badger, western red bat, special-status bats, or nesting raptors and migratory birds protected by the MBTA on-site, Mitigation Measures IV-1 through IV-20 would ensure that any impacts related to special-status species would be reduced to a less-than-significant level. The project site is predominantly undeveloped, has been previously disturbed, and intensive site surveys have determined that the site does does not contain any known historic or prehistoric resources. Thus, implementation of the proposed project is not anticipated to have the potential to result in impacts related to historic or prehistoric resources. Nevertheless, Mitigation Measures V-1 through V-3 would ensure that in the event that historic or prehistoric resources are discovered within the project site, such resources would be protected in compliance with the requirements of CEQA.

Considering the above, the proposed project would not degrade the quality of the environment, substantially reduce or impact the habitat of fish or wildlife species, cause fish or wildlife populations to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. Therefore, a ***less-than-significant*** impact would occur.

b. The proposed project in conjunction with other development within the City of Galt could incrementally contribute to cumulative impacts in the area. However, as demonstrated in this IS/MND, all potential environmental impacts that could occur as a result of project implementation would be reduced to a less-than-significant level through compliance with

the mitigation measures included in this IS/MND, as well as applicable General Plan policies, Municipal Code standards, and other applicable local and State regulations. In addition, the project would be consistent with the site's existing land use and zoning designations. Accordingly, buildout of the site for commercial use was generally considered in the cumulative analysis of buildout of the General Plan within the General Plan EIR.

As noted in Section 21083.3 of the CEQA Guidelines, where a project is consistent with zoning and general plan designations for the site, and an EIR has been certified with respect to that general plan, the analysis of potential environmental impacts resulting from the individual project should focus on those effects that are peculiar to the proposed project. As demonstrated throughout this IS/MND, the proposed project would not result in any significant environmental impacts peculiar to the project, and, thus, the proposed project would not contribute any new or additional impacts not previously analyzed in the General Plan EIR, despite the requested General Plan Amendment included in the Simmerhorn Ranch Project. Therefore, when viewed in conjunction with other closely related past, present, or reasonably foreseeable future projects, development of the proposed project would not result in a cumulatively considerable contribution to cumulative impacts in the City of Brentwood, and the project's incremental contribution to cumulative impacts would be ***less than significant***.

c. As described in this IS/MND, the proposed project would comply with all applicable General Plan policies, Municipal Code standards, other applicable local and State regulations, and mitigation measures included herein. In addition, as discussed in Section III, Air Quality, Section IX, Hazards and Hazardous Materials, and Section XIII, Noise, of this IS/MND, the proposed project would not cause substantial effects to human beings substantially beyond the background levels for such effects, including effects related to exposure to air pollutants, hazardous materials, traffic, and noise. Therefore, the proposed project's impact would be ***less than significant***.

APPENDIX A

AIR QUALITY AND GHG MODELING RESULTS

APPENDIX B

BIOLOGICAL RESOURCES REPORTS

APPENDIX C

SUSTAINABILITY CHECKLIST

APPENDIX D

NOISE ASSESSMENT

APPENDIX E

TRAFFIC IMPACT STUDY