



Mitigated Negative Declaration

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

1. Control Number: PLNP2021-00214

2. Title and Short Description of Project: Tributary Point Storage

The project applicant is requesting the following entitlements:

1. **Zoning Agreement Amendment (ZGB)** to remove/modify Condition of Approval (b)(3)(a)(5) in Exhibit II of the First Amended Zoning Agreement and allow the construction of three new structures, totaling ~137,768-sf.
2. **Use Permit (UPP)** to allow a mini-storage facility within a Shopping Center (SC) zone, pursuant to land uses specified in the SZC § 2.9, Light Commercial (LC) zoning district.
3. **A Development Plan Review (PSS)** to allow development of the 5.25-acre site for three new structures, totaling ~137,768-sf, including on-site parking and landscaping, per Condition of Approval (b)(3) in Exhibit II of the First Amended Zoning Agreement. Specifically, the self-storage buildings would be:
 - o Bldg 'A' 3-story, 124,650-sf,
 - o Bldg 'B' 1-story, 9,014-sf;
 - o Bldg 'C', 1-story, 3,264-sf, with attached 840-sf office
4. **A Design Review** to comply with the Countywide Design Guidelines.

The project would consist of the construction of three buildings totaling approximately 138,000 square feet. The first building (Building A) is approximately 124,650 square foot structure to be built on an existing building pad. The second building (Building B) is an approximately 9,014 square foot structure located on the southern portion of the project site on part of an existing paved parking area; and the third building (Building C) is an approximately 3,264 square foot structure with an approximately 840 square foot office on the eastern side of the project site on an existing paved parking area.

3. Assessor's Parcel Number: 069-0650-019-0000

4. Location of Project: The project site is located at 12130 Tributary Point Drive Between Tributary Point Drive And US 50 Approximately 1,400 Feet West Of Hazel Avenue In the Cordova Community

5. Project Applicant: American Recess, LLC

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

- a. It will not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.
- b. It will not have the potential to achieve short-term, to the disadvantage of long-term, environmental goals.
- c. It will not have impacts, which are individually limited, but cumulatively considerable.
- d. It will not have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly.

7. As a result thereof, the preparation of an environmental impact report pursuant to the Environmental Quality Act (Division 13 of the Public Resources Code of the State of California) is not required.

8. The attached Initial Study has been prepared by the Sacramento County Office of Planning and Environmental Review in support of this Mitigated Negative Declaration. Further information may be obtained by contacting the Office of Planning and Environmental Review at 827 Seventh Street, Room 225, Sacramento, California, 95814, or phone (916) 874-6141.

[Original Signature on File]

Joelle Inman

Environmental Coordinator

County of Sacramento, State of California

**COUNTY OF SACRAMENTO
PLANNING AND ENVIRONMENTAL REVIEW
INITIAL STUDY**

PROJECT INFORMATION

CONTROL NUMBER: PLNP2021-00214

NAME: Tributary Point Storage

LOCATION: The project site is located at 12130 Tributary Point Drive Between Tributary Point Drive And US 50 Approximately 1,400 Feet West Of Hazel Avenue In the Cordova Community (Plate IS-1).

ASSESSOR'S PARCEL NUMBER: 069-0650-019-0000

OWNER/APPLICANT: American Recess, LLC
85 Keystone Avenue, Suite E
Reno, NV 89503
Contact: Larry Thom

ENGINEER: Omega Engineering Consultants, Inc.
4340 Viewridge Avenue - Suite B
San Diego, CA 92123
Contact: Sean Savage

PROJECT DESCRIPTION

The project applicant is requesting the following entitlements:

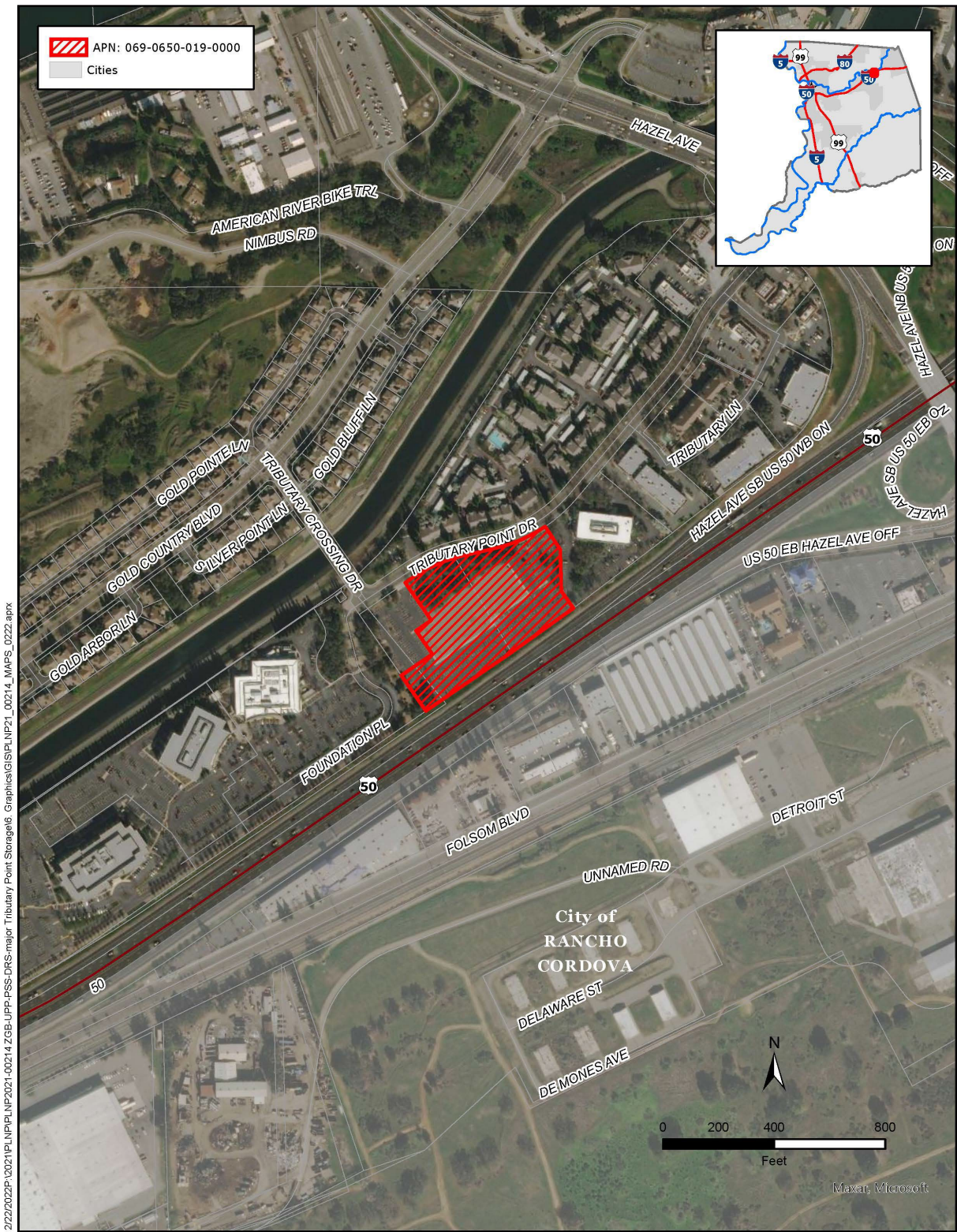
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 - Bldg 'A' 3-story, 124,650-sf,
 - Bldg 'B' 1-story, 9,014-sf;

- Bldg 'C', 1-story, 3,264-sf, with attached 840-sf office

4. A **Design Review** to comply with the Countywide Design Guidelines.

The project would consist of the construction of three buildings totaling approximately 138,000 square feet. The first building (Building A) is approximately 124,650 square foot structure to be built on an existing building pad. The second building (Building B) is an approximately 9,014 square foot structure located on the southern portion of the project site on part of an existing paved parking area; and the third building (Building C) is an approximately 3,264 square foot structure with an approximately 840 square foot office on the eastern side of the project site on an existing paved parking area. The project site plan is shown on Plate IS-2.

Plate IS-1: Aerial Photo



ENVIRONMENTAL SETTING

The project is located between Tributary Point Drive and US 50 west of Hazel Avenue in the Cordova community (Plate IS-1). Project site consists of an existing concrete building pad with paved/striped parking and circulation areas. The northern portion of the site is an area with multiple native and non-native trees. There are also trees located adjacent to the southwestern and eastern parking areas as well landscape trees located within the parking areas themselves. The project site land use designation is Commercial/Offices (Plate IS-3) and is zoned Shopping Center (SC) (Plate IS-4).

The area adjacent to the project site contains commercial office buildings to the west and east with a multi-family housing complex to the north and northeast. Beyond the multi-family housing complex is the Folsom South Canal.

ENVIRONMENTAL EFFECTS

Appendix G of the California Environmental Quality Act (CEQA) provides guidance for assessing the significance of potential environmental impacts. Based on this guidance, Sacramento County has developed an Initial Study Checklist (located at the end of this report). The Checklist identifies a range of potential significant effects by topical area. The topical discussions that follow are provided only when additional analysis beyond the Checklist is warranted.

BACKGROUND

The project area was to be developed as part of an office/industrial park and commercial development (and later residential development) dating back to 1984. The majority of the project area has been developed as envisioned, and the project site appears to be the last lot to be developed. The property has sat vacant with no activity or improvements since 2014.

Studies of alternative use of the site have found that the development of a self-storage facility would be an appropriate use and would supplement the rising need for mini-storage in the area.

The existing Zoning Agreement Amendment Condition (b)(3)(a)(5) states “Development in the SC portion of the project should be limited to one building/tenant to a maximum floor area of 25,000 square feet and two additional buildings/tenants to a maximum of 20,000 square feet. All other buildings shall be less than 20,000 square feet.” In order to develop the site as a self storage facility, the Zoning Agreement Amendment is required to remove/modify Condition (b)(3)(a)(5) and allow the construction of three new structures, totaling approximately 137,768 square feet.

PRIOR APPROVALS ASSOCIATED WITH THE SITE

The project site has been subject to a handful of prior approvals including:

- Control number 1994-0488:- A Final EIR (FEIR) was prepared for the Tributary Point Urban TOD, Community Plan Amendment and Rezone and included the adoption of a Transportation Systems Management Plan (TSMP). A MMRP was adopted with the EIR, and upon satisfaction of the mitigation measures, the MMRP was issued a Program Completion Certificate (PCC) in 2006.
- Control number 1997-0314: An amendment to Zoning Agreement Resolution No. 95-1502 for APN 069-0650-011, 012, 013, 014, an amendment to Zoning Agreement (Resolution No. 97-0813, (effective date 07-25-97) for APN 069-0650-001 and an amendment to the Transportation Systems Management Plan.
- Control number 1997-00433: A Development Plan Review of 3 proposed buildings with a gross square footage of 168,380 feet, and a height exception for two the of the buildings that exceed 40 feet in height in the SC zone.
- Control number 2008-00056: A Development Plan Review to build a two-story, approximately 90,000 gross square foot office building on approximately 6.3 acres in the SC (*Shopping Center*) zone.

Plate IS-2: Site Plan

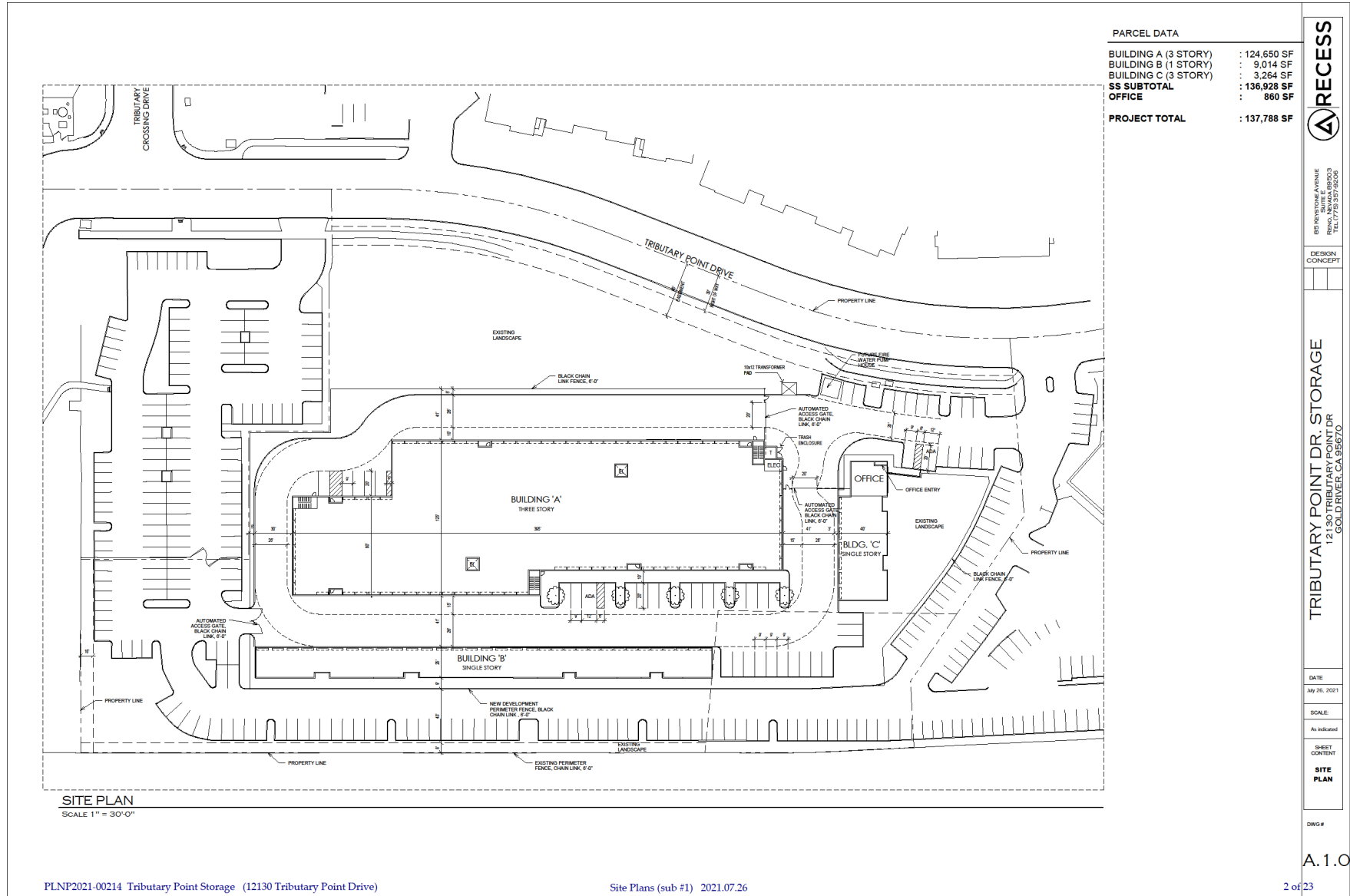


Plate IS-3: Land Use

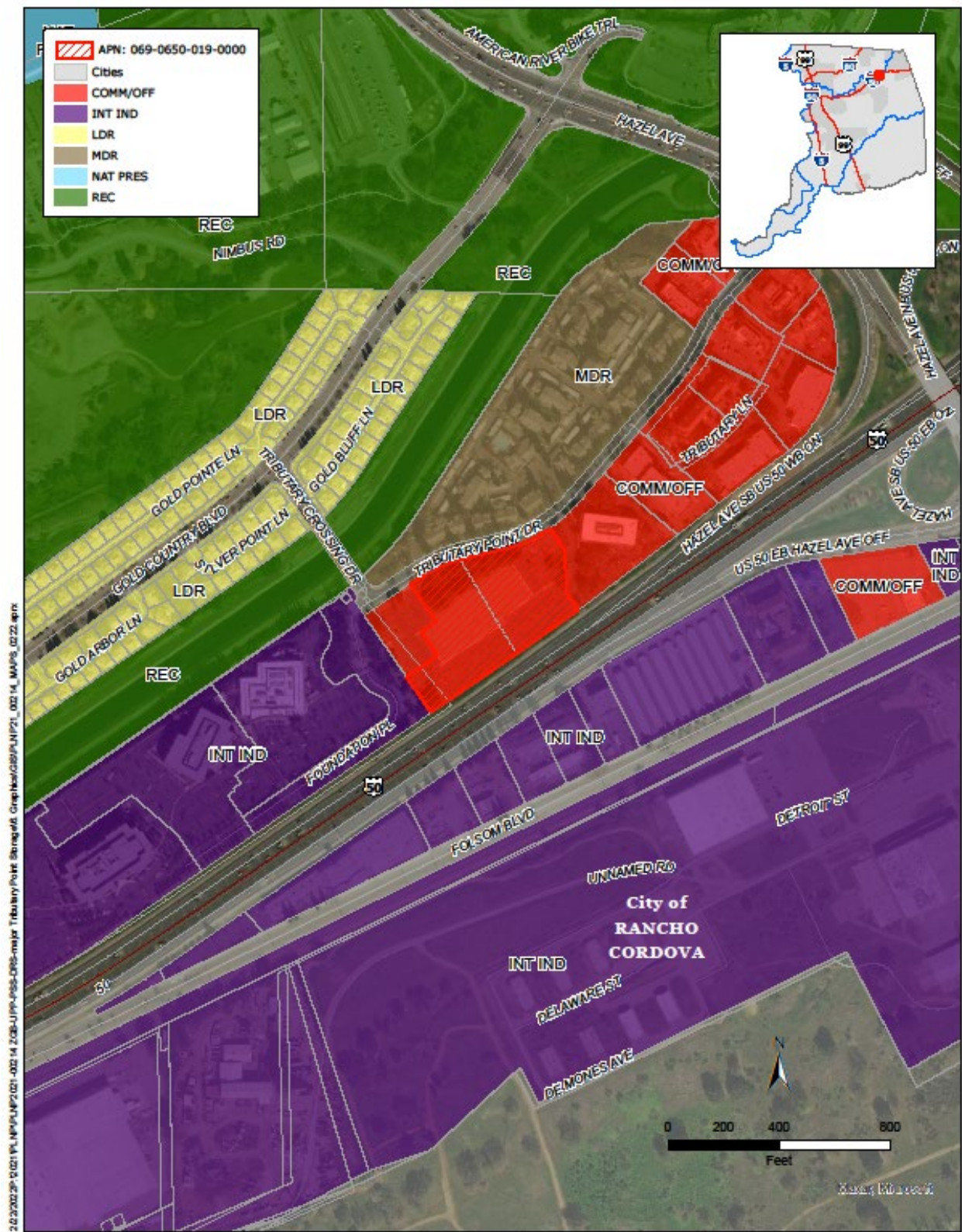
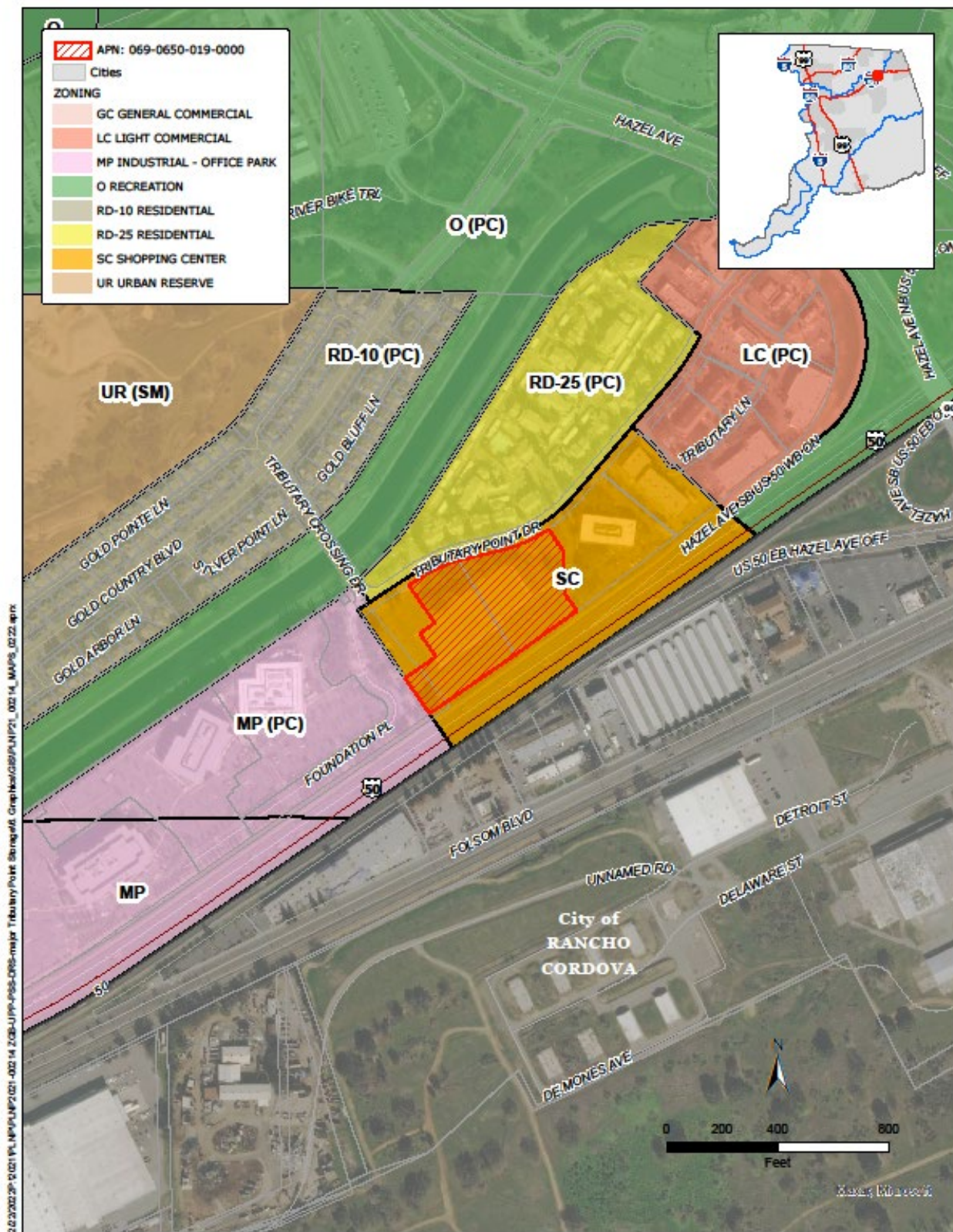


Plate IS-4: Zoning



AIR QUALITY

This section supplements the Initial Study Checklist by analyzing if the proposed project would:

- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard.

The proposed project site is located in the Sacramento Valley Air Basin (SVAB). The SVAB's frequent temperature inversions result in a relatively stable atmosphere that increases the potential for pollution. Within the SVAB, the Sacramento Metropolitan Air Quality Management District (SMAQMD) is responsible for ensuring that emission standards are not violated. Project related air emissions would have a significant effect if they would result in concentrations that either violate an ambient air quality standard or contribute to an existing air quality violation (Table IS-1). Moreover, SMAQMD has established significance thresholds to determine if a proposed project's emission contribution significantly contributes to regional air quality impacts (Table IS-2).

Table IS-1: Air Quality Standards Attainment Status

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

Hydrogen Sulfide	Unclassified (1 hour Standard)	No Federal Standard
<p>1. Per Health and Safety Code (HSC) § 40921.59(c), the classification is based on 1989-1001 data, and therefore does not change.</p> <p>2. Air Quality meets Federal 1-hour Ozone standard (77 FR 64036). EPA revoked this standard, but some associated requirements still apply. The SMAQMD attained the standard in 2009.</p> <p>3. For the 1997, 2008 and the 2015 Standard.</p> <p>4. Cannot be classified</p> <p>5. Designation was made as part of EPA's designations for the 2010 SO₂ Primary National Ambient Air Quality Standard – Round 3 Designation in December 2017</p> <p>* Designations based on information from http://www.arb.ca.gov/desig/changes.htm#reports</p> <p>Source: SMAQMD. "Air Quality Pollutants and Standards". Web. Accessed: December 3, 2018. http://airquality.org/air-quality-health/air-quality-pollutants-and-standards</p>		

Table IS-2: SMAQMD Significance Thresholds

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

CONSTRUCTION EMISSIONS/SHORT-TERM IMPACTS

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

PARTICULATE MATTER EMISSIONS

The SMAQMD Guide includes screening criteria for construction-related particulate matter. Projects that are 35 acres or less in size will generally not exceed the SMAQMD's construction PM₁₀ or PM_{2.5} thresholds of significance provided that the project does not:

- Include buildings more than 4 stories tall;
- Include demolition activities;
- Include significant trenching activities;
- Have a construction schedule that is unusually compact, fast-paced, or involves more than 2 phases (i.e., grading, paving, building construction, and architectural coatings) occurring simultaneously;
- Involve cut-and-fill operations (moving earth with haul trucks and/or flattening or terracing hills); or,
- Require import or export of soil materials that will require a considerable amount of haul truck activity

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

The project site is less than 35 acres (5.25 acres total) and does not involve buildings more than 4 stories tall; demolition activities; significant trenching activities; an unusually compact construction schedule; cut-and-fill operations; or, import or export of soil materials requiring a considerable amount of haul truck activity. Therefore, the project meets the SMAQMD Guide screening criteria for PM₁₀ and PM_{2.5}. The SMAQMD Guide includes a list of Basic Construction Emissions Control Practices that should be implemented on all projects, regardless of size. Dust abatement practices are required pursuant to SMAQMD Rule 403 and California Code of Regulations, Title 13, sections 2449(d)(3) and 2485; the SMAQMD Guide simply lays out the basic practices needed to comply. Although these are already required by existing rules and regulations, SMAQMD has recommended to formally include them as mitigation. Therefore, the project meets the SMAQMD Guide screening criteria for particulate matter, and impacts are considered ***less than significant***.

OZONE PRECURSOR EMISSIONS (NO_x)

The SMAQMD Guide currently provides screening criteria for construction-related ozone precursor emissions (NO_x) similar to those which will be implemented for particulate matter. Projects that are 35 acres or less in size will generally not exceed the SMAQMD’s construction NO_x thresholds of significance provided that the project does not:

- Include buildings more than 4 stories tall;
- Include demolition activities;
- Include significant trenching activities;

- Have a construction schedule that is unusually compact, fast-paced, or involves more than 2 phases (i.e., grading, paving, building construction, and architectural coatings) occurring simultaneously;
- Involve cut-and-fill operations (moving earth with haul trucks and/or flattening or terracing hills);
- Require import or export of soil materials that will require a considerable amount of haul truck activity; or,
- Require soil disturbance (i.e., grading) that exceeds 15 acres per day. Note that 15 acres is a screening level and shall not be used as a mitigation measure.

The project site is less than 35 acres (5.25 acres total) and does not involve buildings more than 4 stories tall; significant trenching activities; an unusually compact construction schedule; or, import or export of soil materials requiring a considerable amount of haul truck activity. Therefore, the project meets the SMAQMD Guide screening criteria for Ozone precursors impacts are considered to be ***less than significant***.

OPERATIONAL EMISSIONS/LONG-TERM IMPACTS

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

Ultimately, a project typically must have large acreages or intense uses in order to result in significant operational air quality impacts. For ozone precursor emissions the screening table in the SMAQMD Guide allows users to screen out projects which include up to 516,000 square feet for General Office Buildings. For particulate matter emissions the screening table allows users to screen out projects which include up to 1,100,000 square feet for commercial development. Depending on the type of commercial use, the screening level for both ozone precursor emissions and particulate matter emissions is hundreds of thousands of square feet of commercial use. The proposed project consists of the development of 137,000 square foot self-storage facility, and therefore falls below these screening thresholds. Additionally, the 1995 approval for the project site included the adoption of a TSMP that would further reduce impacts associated with operational emissions. Future property owners and tenants are required to participate in implementing the Transportation Systems Management (TSM) Plan (Control No. 1994-CZBSPP- 0488) prepared by the Hoyt Company dated September 6, 1995, including an annual report survey to be submitted annually to the County of Sacramento. Impacts related to operational emissions are expected to be ***less than significant***.

CRITERIA POLLUTANT HEALTH RISKS

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

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

HEALTH EFFECTS SCREENING

In order to estimate the potential health risks that could result from the operational emissions of ROG, NOX, and PM2.5, PER staff implemented the procedures within SMAQMD's Instructions for Sac Metro Air District Minor Project and Strategic Area Project Health Effects Screening Tools (SMAQMD's Instructions). To date, SMAQMD has published three options for analyzing projects: small projects may use the Minor Project Health Screening Tool, while larger projects may use the Strategic Area Project Health Screening Tool, and practitioners have the option to conduct project-specific modeling.

Both the Minor Project Health Screening Tool and Strategic Area Project Health Screening Tool are based on the maximum thresholds of significance adopted within the five air district regions contemplated within SMAQMD's Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District (SMAQMD's Friant Guidance; October 2020). The air district thresholds considered in SMAQMD's Friant Guidance included thresholds from SMAQMD as well as the El Dorado County Air Quality Management District, the Feather River Air Quality Management District, the Placer County Air Pollution Control District, and the Yolo Solano Air Quality Management District. The highest allowable emission rates of NOX, ROG, PM10, and PM2.5 from the five air districts is 82 pounds per day (lbs/day) for all four pollutants. Thus, the Minor Project Health Screening Tool is intended for use by projects that would result in emissions at or below 82 lbs/day, while the Strategic Area Project Health Screening Tool is intended for use by projects that would result in emissions between two and eight times greater than 82 lbs/day. The Strategic Area Project Screening Model was prepared by SMAQMD for five locations throughout the Sacramento region for two scenarios: two times and eight times the threshold of significance level (2xTOS and 8xTOS). The corresponding

emissions levels included in the model for 2xTOS were 164 lb/day for ROG and NOX, and 656 lb/day under the 8xTOS for ROG and NOX (SMAQMD 2020).

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

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

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

DISCUSSION OF PROJECT IMPACTS: CRITERIA POLLUTANT HEALTH RISKS

Since the project was below the daily operational thresholds for criteria air pollutants, the Minor Project Health Screening Tool was used to estimate health risks. The results are shown in Table IS-3 and Table IS-4.

Table IS-3: PM_{2.5} Health Risk Estimates

PM _{2.5} Health Endpoint	Age Range ¹	Incidences Across the Reduced Sacramento o 4-km Modeling Domain Resulting from Project Emissions (per year) ^{2,5}	Incidence s Across the 5-Air-District Region Resulting from Project Emissions (per year) ²	Percent of Backgroun d Health Incidences Across the 5-Air-District Region ³	Total Number of Health Incidences Across the 5-Air-District Region (per year) ⁴
		(Mean)	(Mean)		
Respiratory					
Emergency Room Visits, Asthma	0 - 99	0.84	0.77	0.0042%	18419
Hospital Admissions, Asthma	0 - 64	0.054	0.050	0.0027%	1846
Hospital Admissions, All Respiratory	65 - 99	0.34	0.31	0.0016%	19644
Cardiovascular					
Hospital Admissions, All Cardiovascular (less Myocardial Infarctions)	65 - 99	0.19	0.17	0.00072%	24037
Acute Myocardial Infarction, Nonfatal	18 - 24	0.000069	0.000062	0.0016%	4
Acute Myocardial Infarction, Nonfatal	25 - 44	0.0061	0.0057	0.0019%	308
Acute Myocardial Infarction, Nonfatal	45 - 54	0.016	0.015	0.0020%	741
Acute Myocardial Infarction, Nonfatal	55 - 64	0.027	0.025	0.0020%	1239

Acute Myocardial Infarction, Nonfatal	65 - 99	0.12	0.11	0.0022%	5052
Mortality					
Mortality, All Cause	30 - 99	2.3	2.1	0.0046%	44766
Notes: 1. Affected age ranges are shown. Other age ranges are available, but the endpoints and age ranges shown here are the ones used by the USEPA in their health assessments. The age ranges are consistent with the epidemiological study that is the basis of the health function. 2. Health effects are shown in terms of incidences of each health endpoint and how it compares to the base (2035 base year health effect incidences, or "background health incidence") values. Health effects are shown for the Reduced Sacramento 4-km Modeling Domain and the 5-Air-District Region. 3. The percent of background health incidence uses the mean incidence. The background health incidence is an estimate of the average number of people that are affected by the health endpoint in a given population over a given period of time. In this case, the background incidence rates cover the 5-Air-District Region (estimated 2035 population of 3,271,451 persons). Health incidence rates and other health data are typically collected by the government as well as the World Health Organization. The background incidence rates used here are obtained from BenMAP. 4. The total number of health incidences across the 5-Air-District Region is calculated based on the modeling data. The information is presented to assist in providing overall health context. 5. The technical specifications and map for the Reduced Sacramento 4-km Modeling Domain are included in Appendix A, Table A-1 and Appendix B, Figure B-2 of the <i>Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District</i> .					

Table IS-4: Ozone Health Risk Estimates

Ozone Health Endpoint	Age Range ¹	Incidences Across the Reduced Sacramento 4-km Modeling Domain Resulting from Project Emissions (per year) ^{2,5}	Incidences Across the 5-Air-District Region Resulting from Project Emissions (per year) ²	Percent of Background Health Incidences Across the 5-Air-District Region ³	Total Number of Health Incidences Across the 5-Air-District Region (per year) ⁴
		(Mean)	(Mean)		
Respiratory					
Hospital Admissions, All Respiratory	65 - 99	0.081	0.066	0.00033%	19644
Emergency Room Visits, Asthma	0 - 17	0.30	0.25	0.0042%	5859
Emergency Room Visits, Asthma	18 - 99	0.53	0.44	0.0035%	12560
Mortality					
Mortality, Non-Accidental	0 - 99	0.051	0.044	0.00014%	30386

Notes:

1. Affected age ranges are shown. Other age ranges are available, but the endpoints and age ranges shown here are the ones used by the USEPA in their health assessments. The age ranges are consistent with the epidemiological study that is the basis of the health function.
2. Health effects are shown in terms of incidences of each health endpoint and how it compares to the base (2035 base year health effect incidences, or “background health incidence”) values. Health effects are shown for the Reduced Sacramento 4-km Modeling Domain and the 5-Air-District Region.
3. The percent of background health incidence uses the mean incidence. The background health incidence is an estimate of the average number of people that are affected by the health endpoint in a given population over a given period of time. In this case, the background incidence rates cover the 5-Air-District Region (estimated 2035 population of 3,271,451 persons). Health incidence rates and other health data are typically collected by the government as well as the World Health Organization. The background incidence rates used here are obtained from BenMAP.
4. The total number of health incidences across the 5-Air-District Region is calculated based on the modeling data. The information is presented to assist in providing overall health context.
5. The technical specifications and map for the Reduced Sacramento 4-km Modeling Domain are included in Appendix A, Table A-1 and Appendix B, Figure B-2 of the *Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District*.

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

CONCLUSION: CRITERIA POLLUTANT HEALTH RISKS

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

HYDROLOGY AND WATER QUALITY

This section supplements the Initial Study Checklist by analyzing if the proposed project would:

- Create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality.

WATER QUALITY

CONSTRUCTION WATER QUALITY: EROSION AND GRADING

Construction on undeveloped land exposes bare soil, which can be mobilized by rain or wind and displaced into waterways or become an air pollutant. Construction equipment can also track mud and dirt onto roadways, where rains will wash the sediment into storm drains and thence into surface waters. After construction is complete, various other pollutants generated by site use can also be washed into local waterways. These pollutants include, but are not limited to, vehicle fluids, heavy metals deposited by vehicles, and pesticides or fertilizers used in landscaping.

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

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

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

Applicable projects applying for a County grading permit must show proof that a WDID # has been obtained and must submit a copy of the SWPPP. Although the County has no enforcement authority related to the CGP, the County does have the authority to ensure

sediment/pollutants are not discharged and is required by its Municipal Stormwater Permit to verify that SWPPPs include the minimum components.

The project must include an effective combination of erosion, sediment and other pollution control BMPs in compliance with the County ordinances and the State's CGP.

Erosion controls should always be the *first line of defense*, to keep soil from being mobilized in wind and water. Examples include stabilized construction entrances, tackified mulch, 3-step hydroseeding, spray-on soil stabilizers and anchored blankets. Sediment controls are the *second line of defense*; they help to filter sediment out of runoff before it reaches the storm drains and local waterways. Examples include rock bags to protect storm drain inlets, staked or weighted straw wattles/fiber rolls, and silt fences.

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

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

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

Project compliance with requirements outlined above, as administered by the County and the Regional Water Board will ensure that project-related erosion and pollution impacts are *less than significant*.

OPERATION: STORMWATER RUNOFF

Development and urbanization can increase pollutant loads, temperature, volume and discharge velocity of runoff over the predevelopment condition. The increased volume, increased velocity, and discharge duration of stormwater runoff from developed areas has the potential to greatly accelerate downstream erosion and impair stream habitat in natural drainage systems. Studies have demonstrated a direct correlation between the degree of imperviousness of an area and the degradation of its receiving waters. These

impacts must be mitigated by requiring appropriate runoff reduction and pollution prevention controls to minimize runoff and keep runoff clean for the life of the project.

The County requires that projects include source and/or treatment control measures on selected new development and redevelopment projects. Source control BMPs are intended to keep pollutants from contacting site runoff. Examples include “No Dumping-Drains to Creek/River” stencils/stamps on storm drain inlets to educate the public, and providing roofs over areas likely to contain pollutants, so that rainfall does not contact the pollutants. Treatment control measures are intended to remove pollutants that have already been mobilized in runoff. Examples include vegetated swales and water quality detention basins. These facilities slow water down and allow sediments and pollutants to settle out prior to discharge to receiving waters. Additionally, vegetated facilities provide filtration and pollutant uptake/adsorption. The project proponent should consider the use of “low impact development” techniques to reduce the amount of imperviousness on the site, since this will reduce the volume of runoff and therefore will reduce the size/cost of stormwater quality treatment required. Examples of low impact development techniques include pervious pavement and bioretention facilities.

The County requires developers to utilize the *Stormwater Quality Design Manual for the Sacramento Region, 2018* (Design Manual) in selecting and designing post-construction facilities to treat runoff from the project. Regardless of project type or size, developers are required to implement the minimum source control measures (Chapter 4 of the Design Manual). Low impact development measures and Treatment Control Measures are required of all projects exceeding the impervious surface threshold defined in Table 3-2 and 3-3 of the Design Manual. Further, depending on project size and location, hydromodification control measures may be required (Chapter 5 of the Design Manual).

Updates and background on the County’s requirements for post-construction stormwater quality treatment controls, along with several downloadable publications, can be found at the following websites:

<http://www.waterresources.saccounty.net/stormwater/Pages/default.aspx>

<http://www.beriverfriendly.net/Newdevelopment/>

The final selection and design of post-construction stormwater quality control measures is subject to the approval of the County Department of Water Resources; therefore, they should be contacted as early as possible in the design process for guidance. Project compliance with requirements outlined above will ensure that project-related stormwater pollution impacts are *less than significant*.

BIOLOGICAL RESOURCES

This section supplements the Initial Study Checklist by analyzing if the proposed project would:

- Have a substantial adverse effect on any special status species, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, or threaten to eliminate a plant or animal community.
- Have a substantial adverse effect on riparian habitat or other sensitive natural communities.
- Have a substantial adverse effect on streams, wetlands, or other surface waters that are protected by federal, state, or local regulations and policies.
- Have a substantial adverse effect on the movement of any native resident or migratory fish or wildlife species.
- Adversely affect or result in the removal of native or landmark trees.

BIOLOGICAL RESOURCES – REGULATORY SETTING

FEDERAL REGULATIONS

FEDERAL ENDANGERED SPECIES ACT

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

MIGRATORY BIRD TREATY ACT

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

STATE REGULATIONS

STATE ENDANGERED SPECIES ACT

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

CALIFORNIA FISH AND GAME CODE, SECTION 3503.5 - RAPTOR NESTS

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

LOCAL REGULATIONS

COUNTY OF SACRAMENTO GENERAL PLAN

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

BIOLOGICAL RESOURCES- IMPACTS AND ANALYSIS

SPECIAL STATUS SPECIES

Staff review of the project site, and search of the California Natural Diversity Database (CNDDDB) species list was used to determine the potential habitats and species which could be impacted by the project. Some sensitive habitats, plants, and animals occur within the Folsom quadrangle and adjacent Buffalo Creek quadrangle. The CNDDDB indicates documented occurrences of western pond turtle, tricolor blackbird, Swainson’s hawk, bank swallow, white tailed kite, silver-haired bat, pallid bat American badger, Valley elderberry long horn beetle (VELB), vernal pool tadpole shrimp, Northern Hardpan Vernal Pool, and steelhead within the specific quadrangles. However, the database does not indicate the presence of any of the above listed species within the project limits. The closest occurrences of the species listed above (i.e. western pond turtle) are approximately 1,048 feet north of the project limits. The CNDDDB shows there are no records of VELB being on the project site with the nearest record of a VELB approximately 2,334 to the east of the project site. However, during the preparation of the arborist report an elderberry plant was found on the property. This elderberry plant could be habitat for

VELB. The project site does not contain habitat to support western pond turtle, steelhead, tricolor blackbird, silver-haired bat, pallid bat American badger, vernal pool tadpole shrimp, and Northern Hardpan Vernal Pool. The species that have the potential for occurrence on the project site are discussed in further detail below.

VALLEY ELDERBERRY LONG HORN BEETLE

The VELB, was listed as a Federally threatened species on August 8, 1980. The beetle's range extends throughout California's Central Valley and associated foothills. It is a wood boring beetle that is completely dependent on its host plant, elderberry (*Sambucus* sp.). Adult beetles are short-lived and likely to feed on the flowers of the elderberry shrub. The majority of the species' life is spent in larval form within the stem of an elderberry plant where it feeds on the pith of larger stems and roots during development. Adults emerge from the stems in late March through June, near the time elderberries produce flowers. The presence of exit holes in elderberry stems, resulting from adult emergence, is often the only exterior evidence that a plant has been occupied by the beetle (USFWS 1984).

Elderberry shrubs are a common component of the remnant riparian forests and adjacent upland habitats of the Central Valley. Vegetation in these riparian communities commonly includes species such as Fremont cottonwood (*Populus fremontii*), California sycamore (*Plantanus recemosa*), willows (*Salix* spp.), valley oak (*Quercus lobata*), box elder (*Acer negundo* var. *californium*), and Oregon ash (*Fraxinus latifolia*). VELB is more abundant in dense native plant habitats with mature overstory and mixed understory (USFWS 1999).

PROJECT IMPACTS - VELB

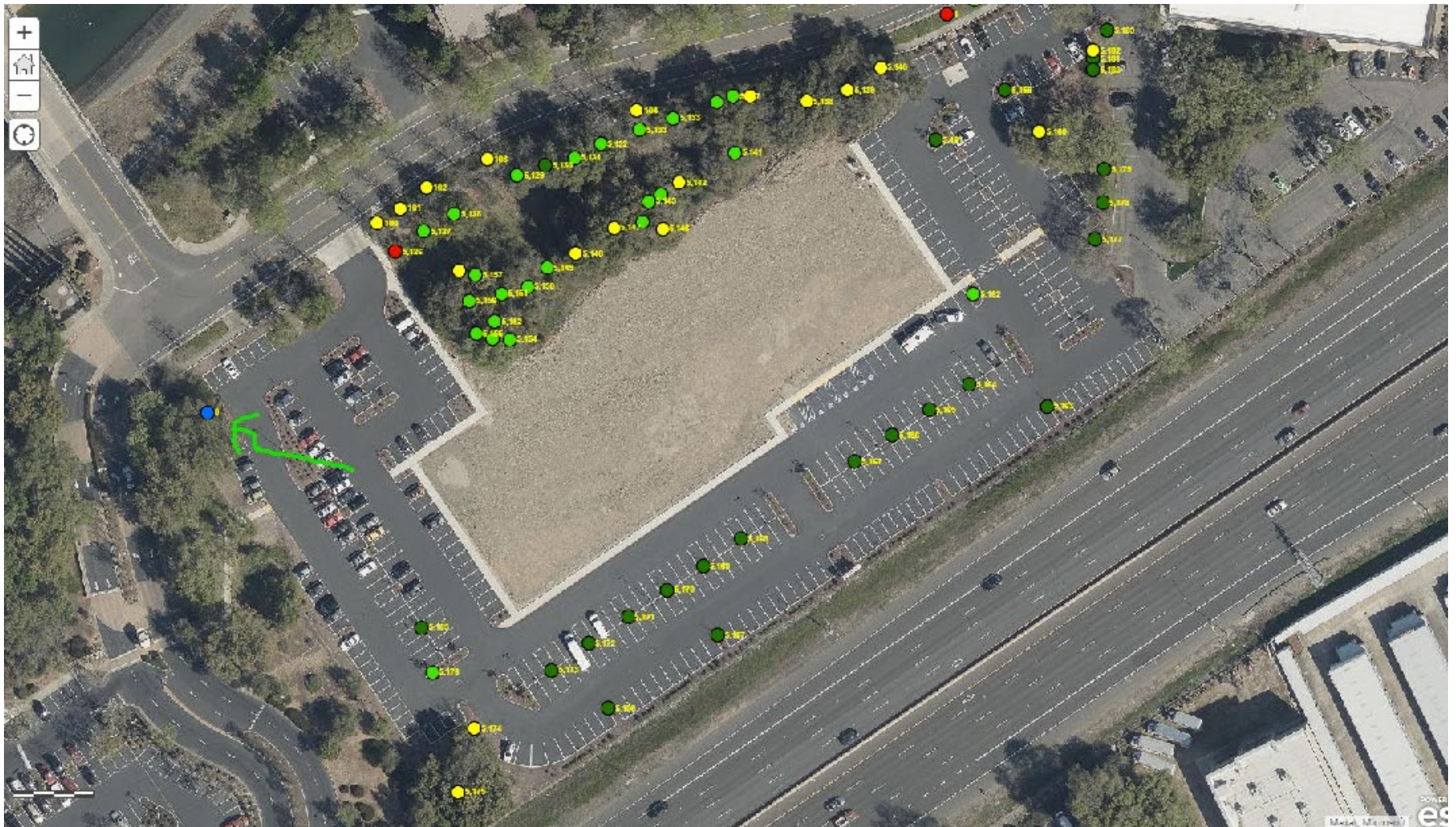
The Project site is not located within Critical Habitat for VELB. Critical Habitat was designated for this species in 1980 (45 No.155 FR 52803 52807). There are elderberry clumps growing within the project site, and along the Caltrans fence line. The nearest elderberry is within the project site, approximately 200 feet to the west of the project site activities (Plate IS-5).

No elderberry shrubs will be removed as a result of the project. The most recent USFWS guidance (2017) has established protocols to minimize impacts to VELB, including implementing an avoidance buffer of at least 20 feet around elderberry plants. While outside of the proposed development area, mitigation is proposed so that no construction, hauling, or staging will take place within 20 feet of identified elderberry plants. The project has been designed to avoid impacts to elderberry shrubs and VELB to the maximum extent possible. Thus, impacts to VELB are **less than significant**.

SWAINSON'S HAWK

The Swainson's hawk (*Buteo swainsoni*) is listed as a Threatened species by the State of California and is a candidate for federal listing as threatened or endangered. It is a migratory raptor typically nesting in or near valley floor riparian habitats during spring and summer months. Swainson's hawks were once common throughout the state, but various habitat changes, including the loss of nesting habitat (trees) and the loss of foraging habitat through the conversion of native Central Valley grasslands to certain incompatible agricultural and urban uses has caused an estimated 90% decline in their population.

Plate IS-5: Location of Elderberry Plants



Note: Elderberry plant shown as blue dot.

Swainson's hawks feed primarily upon small mammals, birds, and insects. Their typical foraging habitat includes native grasslands, alfalfa and other hay crops that provide suitable habitat for small mammals. Certain other row crops and open habitats also provide some foraging habitat. The availability of productive foraging habitat near a Swainson's hawk's nest site is a critical requirement for nesting and fledgling success. In central California, about 85% of Swainson's hawk nests are within riparian forest or remnant riparian trees. CEQA analysis of impacts to Swainson's hawks consists of separate analyses of impacts to nesting habitat and foraging habitat.

The CEQA analysis provides a means by which to ascertain impacts to the Swainson's hawk. When the analysis identifies impacts, mitigation measures are established that will reduce impacts to the species to a less than significant level. Project proponents are cautioned that the mitigation measures are designed to reduce impacts and do not constitute an incidental take permit under the California Endangered Species Act (CESA). Anyone who directly or incidentally takes a Swainson's hawk, even when in compliance with mitigation measures established pursuant to CEQA, may violate the California Endangered Species Act.

NESTING HABITAT IMPACT METHODOLOGY

For determining impacts to and establishing mitigation for nesting Swainson's hawks in Sacramento County, CDFW recommends utilizing the methodology set forth in the Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (Swainson's Hawk TAC 2000). The document recommends that surveys be conducted for the two survey periods immediately prior to the start of construction. The five survey periods are defined by the timing of migration, courtship, and nesting in a typical year (refer to Table IS-5). Surveys should extend a ½-mile radius around all project activities, and if active nesting is identified, CDFW should be contacted.

Table IS-3: Recommended Survey Periods for Swainson's Hawk (TAC 2000)

Period #	Timeframe	# of surveys required	Notes
I.	Jan. 1 – Mar. 20	1	Optional, but recommended
II.	Mar. 20 – Apr. 5	3	
III.	Apr. 5 – Apr. 20	3	
IV.	Apr. 21 – June 10	N/A	Initiating surveys is not recommended during this period
V.	June 10 – July 30	3	

For example, if a project is scheduled to begin on June 20, three surveys should be completed in Period III and three surveys in Period V, as surveys should not be initiated in Period IV. It is always recommended that surveys be completed in Periods II, III and V.

PROJECT IMPACTS – SWAINSON’S HAWK

The project site is located 3.4 miles from the nearest recorded Swainson’s hawk occurrence. The project site contains numerous mature trees that could provide adequate nesting habitat for Swainson’s hawk. Therefore, preconstruction surveys for nesting hawks are necessary prior to construction. The purpose of the survey requirement is to ensure that construction activities do not agitate nesting hawks, potentially resulting in nest abandonment or other harm to nesting success. If Swainson’s hawk nests are found, the developer is required to contact California Fish and Wildlife to determine what measures need to be implemented in order to ensure that nesting hawks remain undisturbed. The measures selected will depend on many variables, including the distance of activities from the nest, the types of activities, and whether the landform between the nest and activities provides any kind of natural screening. According to the Recommended Timing and Methodology for Swainson’s Hawk Nesting Surveys in California’s Central Valley (Swainson’s Hawk TAC 2000), the mitigation described above will ensure that impacts to nesting Swainson’s hawk will be ***less than significant***.

NESTING BIRDS OF PREY

This section addresses raptors which are not listed as endangered, threatened, or of special concern, but are nonetheless afforded general protections by the Fish and Game Code. Raptors and their active nests are protected by the California Fish and Game Code Section 3503.5, which states: It is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds of prey, or raptors) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto. Section 3(19) of the Federal Endangered Species Act defines the term “take” means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. Causing a bird to abandon an active nest may cause harm to egg(s) or chick(s) and is therefore considered “take.” Thus, take may occur both as a result of cutting down a tree or as a result of activities nearby an active nest which cause nest abandonment.

Raptors within the Sacramento region include tree-nesting species such as the red-tailed hawk and red-shouldered hawk, as well as ground-nesting species such as the northern harrier. The following raptor species are identified as “special animals” due to concerns over nest disturbance: Cooper’s hawk, sharp-shinned hawk, golden eagle, northern harrier, and white-tailed kite.

The project site contains numerous mature trees that could serve as suitable habitat for nesting raptors. If present, nesting raptors can be disturbed by construction equipment if appropriate measures are not taken. To avoid impacts to nesting raptors, mitigation involves pre-construction nesting surveys to identify any active nests and to implement avoidance measures if nests are found – if construction will occur during the nesting season of March 1 to September 15. The purpose of the survey requirement is to ensure

that construction activities do not agitate or harm nesting raptors, potentially resulting in nest abandonment or other harm to nesting success. If nests are found, the developer is required to contact California Fish and Wildlife to determine what measures need to be implemented in order to ensure that nesting raptors remain undisturbed. The measures selected will depend on many variables, including the distance of activities from the nest, the types of activities, and whether the landform between the nest and activities provides any kind of natural screening. If no active nests are found during the focused survey, no further mitigation will be required. Mitigation will ensure that impacts to nesting raptors will be ***less than significant***.

MIGRATORY BIRDS

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

The project site contains numerous mature trees that could serve as suitable habitat for migratory birds. If present, migratory birds can be disturbed by construction equipment if appropriate measures are not taken. To avoid take of nesting migratory birds, mitigation has been included to require that activities either occur outside of the nesting season, or to require that nests be buffered from construction activities until the nesting season is concluded. Impacts to migratory birds are ***less than significant***.

NATIVE TREES

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

CO-138. Protect and preserve non-oak native trees along riparian areas if used by Swainson’s Hawk, as well as landmark and native oak trees measuring a minimum

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

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

Native trees other than oaks include Fremont cottonwood (*Populus fremontii*), California sycamore (*Platanus racemosa*), California black walnut (*Juglans californica*, which is also a List 1B plant), Oregon ash (*Fraxinus latifolia*), western redbud (*Cercis occidentalis*), gray pine (*Pinus sabiniana*), California white alder (*Alnus rhombifolia*), boxelder (*Acer negundo*), California buckeye (*Aesculus californica*), narrowleaf willow (*Salix exigua*), Gooding's willow (*Salix gooddingii*), red willow (*Salix laevigata*), arroyo willow (*Salix lasiolepis*), shining willow (*Salix lucida*), Pacific willow (*Salix lasiandra*), and dusky willow (*Salix melanopsis*).

NATIVE TREE INVENTORY

The applicant provided a Pre-Development Report & Tree Inventory (Arborist Report) and a supplement (Supplement) prepared by California Tree and Landscape Consulting, Inc. (CalTLC) (Appendix A and B). The Arborist Report identified the species, size, and location of onsite and overhanging offsite trees. CalTLC inventoried and evaluated trees 4 inches or greater diameter at breast height (dbh) and all multi-trunk trees with an aggregate dbh of 10 inches or greater. A total of 94 trees were inventoried and evaluated. Of the 94 trees, 59 of the trees qualify as “protected native trees” by the standards of the Sacramento County Tree Ordinance and Zoning Code. Table IS-6 identifies those protected trees that would be removed or potentially impacted. Refer to Appendix A and B for full inventory of trees onsite. Of the 59 protected trees identified by the survey, 48 are located within the project area and 11 were adjacent to the project. Plate IS-8 shows the location of the trees – both protected and non-protected – to be removed and the potential building footprints. Note: “Tree” No. 1 shown Plate IS-6 is not a tree, but a property point for future reference in confirming point collection accuracy.

Table IS-4: Tree Inventory of Protected Native Trees

Tree #	Common Name	DBH (Inches)	Dripline (Feet)	Rating	Action	Onsite/Offsite Encroachment or impacts from Development	Mitigation
5126	Interior Live Oak	10	12	0	Arborist recommend removal	Onsite	N/A
5146	Interior Live Oak	20	30	2	Retain	Onsite. Potential encroachment impacts during construction.	Mitigation Measure F
5154	Valley Oak	20	27	3	Retain	Onsite. Potential encroachment impacts during construction.	Mitigation Measure F
5159	Valley Oak	4	6	4	Remove	Onsite	N/A size
Total							0 inches of mitigation and Mitigation Measure F

PROJECT IMPACTS: NATIVE TREES**ONSITE AND OFFSITE PROTECTED NATIVE TREES TO BE REMOVED**

The applicant is proposing to remove one onsite oak tree (Tree 5159); however, this tree is less than 6 inches in diameter and therefore considered a sapling and not a tree that requires mitigation. Impacts associated with the removal of protected native trees are ***less than significant***.

ONSITE AND OFFSITE NATIVE TREES SUBJECT TO DEVELOPMENT IMPACTS

There are two-onsite native, heritage-size trees (Trees 5146 and 5154) that could be impacted during grading or construction of roadways or building A. To protect these trees, mitigation has been proposed to reduce temporary impacts due to construction by implementing protective measures. Impacts to these trees are ***less than significant***.

NON-NATIVE TREES

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

CO-145. Removal of non-native tree canopy for development shall be mitigated by creation of new tree canopy equivalent to the acreage of non-native tree canopy removed. New tree canopy acreage shall be calculated using the 15-year shade cover values for tree species.

CO-146. If new tree canopy cannot be created onsite to mitigate for the non-native tree canopy removed for new development, project proponents (including public agencies) shall contribute to the Greenprint funding in an amount proportional to the tree canopy of the specific project.

CO-147. Increase the number of trees planted within residential lots and within new and existing parking lots.

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

The 15-year shade cover values for tree species referenced in policy CO-145 are also referenced by the Sacramento County Zoning Code, Chapter 30, Article 4, and the list is maintained by the Sacramento County Department of Transportation, Landscape Planning and Design Division. The list includes more than seventy trees, so is not included here, but it is available at <http://www.per.saccounty.net/Programs/Documents/Tree%20Coordinator/Tree%2015-year%20shade%20values%201-8-14.pdf#search=15%20year%20shade%20value>.

Policy CO-146 references the Greenprint program, which is run by the Sacramento Tree Foundation and has a goal of planting five million trees in the Sacramento region.

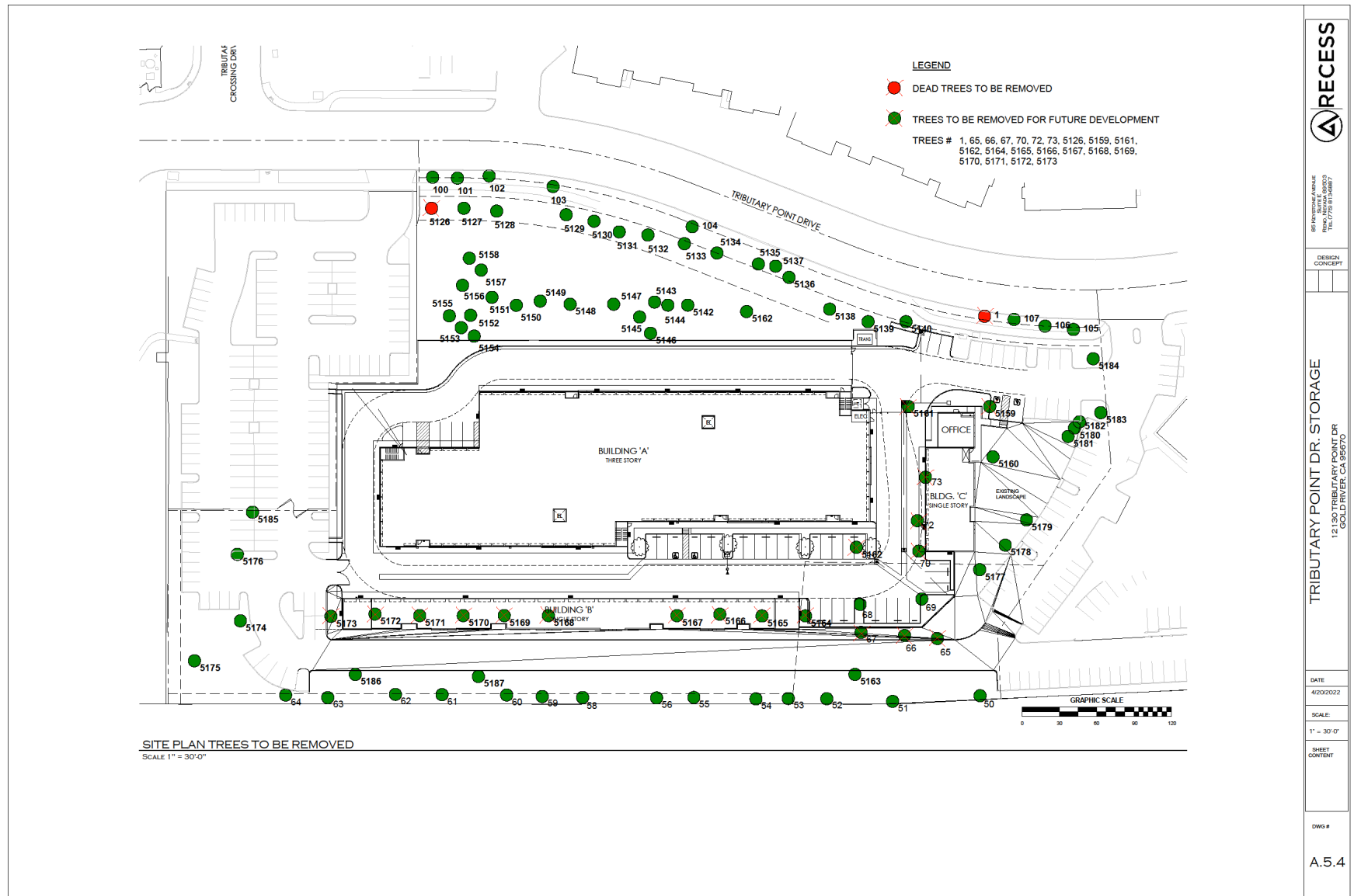
Plate IS-6: Tree Location Map



Plate IS-7: Supplemental Tree Location Map



Plate IS-8: Tree Removal Map



NON-NATIVE TREE INVENTORY

The Arborist Report identified the species, size, and location of onsite and overhanging offsite trees. Of the 94 trees, 35 of the trees are non-native and are not considered “protected trees” by the standards of the Sacramento County Tree Ordinance and Zoning Code (Table IS-7). However, any non-native tree canopy removed would be require mitigation. All trees identified are shown on Plate IS-6 and IS-7. Plate IS-8 shows the location of the trees to be removed and the potential building footprints.

Table IS-5: Tree Inventory of Non-Protected Trees

Tree #	Common Name	DBH (Inches)	Dripline (Feet)	Rating	Action	Mitigation sq. ft.
65	Zelcova	3	6	3	Remove	134
66	Zelcova	5	8	3	Remove	215
67	Zelcova	3	5	3	Remove	149
70	Chinese pistache	4	6	3	Remove	203
72	Chinese pistache	5	8	3	Remove	209
73	Chinese pistache	5	8	3	Remove	228
5161	Zelcova	6	9	4	Remove	290
5162	Chinese pistache	5.5	9	3	Remove	198
5164	Chinese pistache	5.5	9	4	Remove	286
5165	Chinese pistache	4.5	9	4	Remove	206
5166	Chinese pistache	6	9	4	Remove	325

Tree #	Common Name	DBH (Inches)	Dripline (Feet)	Rating	Action	Mitigation sq. ft.
5167	Chinese pistache	5	9	4	Remove	227
5168	Chinese pistache	5	9	4	Remove	179
5169	Chinese pistache	5	9	4	Remove	165
5170	Chinese pistache	4	9	4	Remove	231
5171	Chinese pistache	4	9	4	Remove	172
5172	Chinese pistache	4	9	4	Remove	167
5173	Chinese pistache	4	9	4	Remove	227
Total						3,811

NON-NATIVE TREES - PROJECT IMPACTS

Of the 35 non-native trees on-site, 20 are proposed for removal during the construction of buildings B and C, totaling 3,811 square feet of tree canopy. Mitigation has been included to ensure tree canopy is replaced. County Policy requires that impacts to tree canopy be addressed by replacement or contribution to the Greenprint Program project impacts to non-protected trees are expected to be ***less than significant***.

GREENHOUSE GAS EMISSIONS

This section supplements the Initial Study Checklist by analyzing if the proposed project would:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

GREENHOUSE GAS EMISSIONS REGULATORY BACKGROUND

California has adopted statewide legislation addressing various aspects of climate change and GHG emissions mitigation. Much of this establishes a broad framework for

the State's long-term GHG reduction and climate change adaptation program. Of particular importance is AB 32, which establishes a statewide goal to reduce GHG emissions back to 1990 levels by 2020, and Senate Bill (SB) 375 supports AB 32 through coordinated transportation and land use planning with the goal of more sustainable communities. SB 32 extends the State's GHG policies and establishes a near-term GHG reduction goal of 40% below 1990 emissions levels by 2030. Executive Order (EO) S-03-05 identifies a longer-term goal for 2050.¹

COUNTY OF SACRAMENTO CLIMATE ACTION PLANNING

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

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

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

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

Goals in the section on waste include reductions in waste generation, maximizing waste diversion, and reducing methane emissions at Kiefer landfill. Actions include solid waste reduction and recycling programs, a regional composting facility, changes in the waste

¹ EO S-03-05 has set forth a reduction target to reduce GHG emissions by 80 percent below 1990 levels by 2050. This target has not been legislatively adopted.

vehicle fleet to use non-petroleum fuels, carbon sequestration at the landfill, and methane capture at the landfill.

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

The Phase 1 CAP is a strategy and framework document. The County adopted the Phase 2A CAP (Government Operations) on September 11, 2012. Neither the Phase 1 CAP nor the Phase 2A CAP are “qualified” plans through which subsequent projects may receive CEQA streamlining benefits. The County is currently developing a Communitywide CAP, which will flesh out the strategies involved in the strategy and framework CAP, and will include economic analysis, intensive vetting with all internal departments, community outreach/information sharing, timelines, and detailed performance measures.. The Communitywide CAP is targeted for adoption in summer 2022.

GREENHOUSE GAS EMISSIONS THRESHOLDS OF SIGNIFICANCE

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

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

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

- BMP 1 – no natural gas: projects shall be designed and constructed without natural gas infrastructure.

- BMP 2 – electric vehicle (EV) Ready: projects shall meet the current CalGreen Tier 2 standards.
 - EV Capable requires the installation of “raceway” (the enclosed conduit that forms the physical pathway for electrical wiring to protect it from damage) and adequate panel capacity to accommodate future installation of a dedicated branch circuit and charging station(s)
 - EV Ready requires all EV Capable improvements plus installation of dedicated branch circuit(s) (electrical pre-wiring), circuit breakers, and other electrical components, including a receptacle (240-volt outlet) or blank cover needed to support future installation of one or more charging stations

Projects that implement BMP 1 and BMP 2 can utilize the screening criteria for operation emissions outlined in Table IS-8. Projects that do not exceed 1,100 metric tons per year are then screened out of further requirements. For projects that exceed 1,100 metric tons per year, then compliance with BMP 3 is also required:

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

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

Table IS-6: SMAQMD Criteria for Thresholds of Significance for Greenhouse Gases

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

GREENHOUSE GAS EMISSIONS PROJECT IMPACTS

CONSTRUCTION-GENERATED GREENHOUSE GAS EMISSIONS

GHG emissions associated with the project would occur over the short term from construction activities, consisting primarily of emissions from equipment exhaust. Table

IS-9 illustrates the specific construction-generated GHG emissions that would result from grading, construction of the three structures, and architectural coating.

Table IS-9: Construction-Related Greenhouse Gas Emissions (Metric Tons per Year)

Emissions Source	CO ₂ e
SMAQMD Construction Threshold	1,100
Project Construction-Related Emissions*	247.41
Exceeds Threshold?	No
Note: *combined construction-related emissions from CalEEMod accounting for grading, sub-grade utilities, building construction, and architectural coating. Source: CalEEMod version 2020.4.0 and Roadway Construction Emissions Model Ver. 9.0.0. See Appendix C for emission model outputs.	

As shown in Table IS-9, project construction would result in the generation of approximately 247.41 metric tons of CO₂e during construction. The project is within the screening criteria for construction related impacts related to air quality. Therefore, construction-related GHG impacts are considered ***less than significant***.

OPERATION-GENERATED GREENHOUSE GAS EMISSIONS

Operation of the project would result in GHG emissions predominantly associated with motor vehicle use. Table IS-10 summarizes all the direct and indirect annual GHG emissions level associated with the project.

Table IS-7: Operational-Related Greenhouse Gas Emissions (Metric Tons/Year)

Emissions Source	CO ₂ e
Area Source	3.9700 ^{-e003}
Energy	0.00 (less than 1 MT/Year)
Mobile	0.00
Waste	0.00
Water	0.00
Total	3.9700 ^{-e003}

Source: CalEEMod version 2020.4.0. See Appendix C for emission model outputs.

As shown in Table IS-10, the project would produce 3.9700^{-e003} metric tons of CO₂e annually. Area emissions are the primary source. The project will be required to implement Tier 1 BMP 1 and 2, and can therefore utilize the SMAQMD screening

thresholds. The project would not exceed SMAQMD's established annual threshold of 1,100 metric tons. The project GHG emissions would be less than a significant contribution to the cumulative operational GHG emissions of the plan-wide area. Mitigation has been included such that the project will implement BMP 1 and BMP 2. Implementation of BMPs will result in the project using electrical climate control equipment for the storage facilities and office space and the installation of 4 EV capable parking spaces based on the projects 52 parking space. The impacts from GHG emissions are ***less than significant with mitigation***.

ENVIRONMENTAL MITIGATION MEASURES

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

As the applicant, or applicant's representative, for this project, I acknowledge that project development creates the potential for significant environmental impact and agree to implement the mitigation measures listed below, which are intended to reduce potential impacts to a less than significant level.

Applicant [Original Signature on File] Date: _____

MITIGATION MEASURE A: BASIC CONSTRUCTION EMISSIONS CONTROL PRACTICES

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

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

- Water all exposed surfaces two times daily. Exposed surfaces include, but are not limited to soil piles, graded areas, unpaved parking areas, staging areas, and access roads.
- Cover or maintain at least two feet of free board space on haul trucks transporting soil, sand, or other loose material on the site. Any haul trucks that would be traveling along freeways or major roadways should be covered.

- Use wet power vacuum street sweepers to remove any visible trackout mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited.
- Limit vehicle speeds on unpaved roads to 15 miles per hour (mph).
- All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.

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

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

MITIGATION MEASURE B: VALLEY ELDERBERRY LONGHORN BEETLE

In order to minimize impacts to valley elderberry longhorn beetle and their habitat to the maximum extent possible, the following avoidance and minimization efforts shall be adhered to:

- Project activities may occur up to 20 feet from the dripline of elderberry shrubs if precautions are implemented to minimize the potential for indirect impacts. An avoidance area shall be established at least 20 feet from the drip line of an elderberry shrub for any activities that may damage or kill the elderberry shrub (e.g., trenching, paving, excavation). The project applicant shall implement avoidance and minimization measures specified in the USFWS Framework (USFWS 2017).
- To the extent feasible, excavation and trenching within 165 feet of elderberry shrubs shall occur outside of the VELB flight season (March through July).
- Signs shall be placed along the edge of the avoidance area with the following information: "This area is habitat of the valley elderberry longhorn beetle, a threatened species, and must not be disturbed. This species is protected by the

Endangered Species Act of 1973, as amended. Violators are subject to prosecution.” The signs should be clearly readable from a distance of 20 feet, and must be maintained for the duration of construction.

- Contractors and work crews shall be educated on the status of the beetle, the need to avoid damaging the elderberry plants, and the possible penalties for not complying with these requirements.
- A qualified biologist shall monitor the work areas within 165 feet of elderberry shrubs at project-appropriate intervals to assure that all avoidance and minimization measures are implemented. The amount and duration of monitoring will depend on specific project activities and shall be determined by the qualified biologist and should be discussed with a USFWS biologist.

MITIGATION MEASURE C: SWAINSON’S HAWK NESTING HABITAT

If construction, grading, or project-related improvements are to commence between March 1 and September 15, a focused survey for Swainson’s hawk nests on the site and within ½ mile of the site shall be conducted by a qualified biologist in accordance with the Recommended Timing And Methodology For Swainson’s Hawk Nesting Surveys In California’s Central Valley by Swainson’s Hawk Technical Advisory Committee (May 31, 2000) prior to the start of construction work (including clearing and grubbing). If active nests are found, the California Fish and Wildlife shall be contacted to determine appropriate protective measures, and these measures shall be implemented prior to the start of any ground-disturbing activities. If no active nests are found during the focused survey, no further mitigation will be required.

MITIGATION MEASURE D: RAPTOR NEST PROTECTION

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

MITIGATION MEASURE E: MIGRATORY BIRD NEST PROTECTION

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

1. If construction activity (which includes clearing, grubbing, or grading) is to commence within 50 feet of nesting habitat between February 1 and August 31, a

survey for active migratory bird nests shall be conducted no more than 14 day prior to construction by a qualified biologist.

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

MITIGATION MEASURE F: OAK TREE CONSTRUCTION PROTECTION

For the purpose of this mitigation measure, a native tree is defined as a valley oak and interior live oak having a diameter at breast height (dbh) of at least 6 inches, or if it has multiple trunks of less than 6 inches each, a combined dbh of at least 10 inches.

All native trees on the project site all portions of adjacent off-site native trees which have driplines that extend onto the project site, and all off-site native trees which may be impacted by utility installation and/or improvements associated with this project, shall be preserved and protected as follows:

1. A circle with a radius measurement from the trunk of the tree to the tip of its longest limb shall constitute the dripline protection area of the tree. Limbs must not be cut back in order to change the dripline. The area beneath the dripline is a critical portion of the root zone and defines the minimum protected area of the tree. Removing limbs which make up the dripline does not change the protected area.
2. Chain link fencing or a similar protective barrier shall be installed one foot outside the driplines of the native trees prior to initiating project construction, in order to avoid damage to the trees and their root system.
3. No signs, ropes, cables (except cables which may be installed by a certified arborist to provide limb support) or any other items shall be attached to the native trees.
4. No vehicles, construction equipment, mobile home/office, supplies, materials or facilities shall be driven, parked, stockpiled or located within the driplines of the native trees.
5. Any soil disturbance (scraping, grading, trenching, and excavation) is to be avoided within the driplines of the native trees. Where this is necessary, an ISA

Certified Arborist will provide specifications for this work, including methods for root pruning, backfill specifications and irrigation management guidelines.

6. All underground utilities and drain or irrigation lines shall be routed outside the driplines of native trees. Trenching within protected tree driplines is not permitted. If utility or irrigation lines must encroach upon the dripline, they should be tunneled or bored under the tree under the supervision of an ISA Certified Arborist.
7. Drainage patterns on the site shall not be modified so that water collects or stands within, or is diverted across, the dripline of oak trees.
8. No sprinkler or irrigation system shall be installed in such a manner that it sprays water within the driplines of the oak trees.
9. Tree pruning that may be required for clearance during construction must be performed by an ISA Certified Arborist or Tree Worker and in accordance with the American National Standards Institute (ANSI) A300 pruning standards and the International Society of Arboriculture (ISA) "Tree Pruning Guidelines".
10. Landscaping beneath the oak trees may include non-plant materials such as boulders, decorative rock, wood chips, organic mulch, non-compacted decomposed granite, etc. Landscape materials shall be kept two (2) feet away from the base of the trunk. The only plant species which shall be planted within the driplines of the oak trees are those which are tolerant of the natural semi-arid environs of the trees. Limited drip irrigation approximately twice per summer is recommended for the understory plants.
11. Any fence/wall that will encroach into the dripline protection area of any protected tree shall be constructed using grade beam wall panels and posts or piers set no closer than 10 feet on center. Posts or piers shall be spaced in such a manner as to maximize the separation between the tree trunks and the posts or piers in order to reduce impacts to the trees.
12. For a project constructing during the months of June, July, August, and September, deep water trees by using a soaker hose (or a garden hose set to a trickle) that slowly applies water to the soil until water has penetrated at least one foot in depth. Sprinklers may be used to water deeply by watering until water begins to run off, then waiting at least an hour or two to resume watering (provided that the sprinkler is not wetting the tree's trunk. Deep water every 2 weeks and suspend watering 2 weeks between rain events of 1 inch or more.

MITIGATION MEASURE G: CANOPY REPLACEMENT

Removal of 3,811 square feet of non-native tree canopy for development shall be mitigated by creation of new tree canopy equivalent to the acreage of non-native tree canopy removed. New tree canopy acreage shall be calculated using the Sacramento County Department of Transportation 15-year shade cover values for tree species.

Preference is given to on-site mitigation, but if this is infeasible, then funding shall be contributed to the Sacramento Tree Foundation's Greenprint Program in an amount proportional to the tree canopy lost.

MITIGATION MEASURE H: CULTURAL RESOURCES UNANTICIPATED DISCOVERY

In the event that human remains are discovered in any location other than a dedicated cemetery, work shall be halted and the County Coroner contacted. For all other unexpected cultural resources discovered during project construction, work shall be halted until a qualified archaeologist may evaluate the resource encountered.

1. Pursuant to Sections 5097.97 and 5097.98 of the State Public Resources Code, and Section 7050.5 of the State Health and Safety Code, if a human bone or bone of unknown origin is found during construction, all work is to stop and the County Coroner and the Office of Planning and Environmental Review shall be immediately notified. If the remains are determined to be Native American, the coroner shall notify the Native American Heritage Commission within 24 hours, and the Native American Heritage Commission shall identify the person or persons it believes to be the most likely descendent from the deceased Native American. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposition of, with appropriate dignity, the human remains and any associated grave goods.
2. In the event of an inadvertent discovery of cultural resources (excluding human remains) during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeology, shall be retained at the Applicant's expense to evaluate the significance of the find. If it is determined due to the types of deposits discovered that a Native American monitor is required, the Guidelines for Monitors/Consultants of Native American Cultural, Religious, and Burial Sites as established by the Native American Heritage Commission shall be followed, and the monitor shall be retained at the Applicant's expense.
 - a. Work cannot continue within the 100-foot radius of the discovery site until the archaeologist and/or tribal monitor conducts sufficient research and data collection to make a determination that the resource is either 1) not cultural in origin; or 2) not potentially eligible for listing on the National Register of Historic Places or California Register of Historical Resources.
 - b. If a potentially-eligible resource is encountered, then the archaeologist and/or tribal monitor, Planning and Environmental Review staff, and project

proponent shall arrange for either 1) total avoidance of the resource, if possible; or 2) test excavations or total data recovery as mitigation. The determination shall be formally documented in writing and submitted to the County Environmental Coordinator as verification that the provisions of CEQA for managing unanticipated discoveries have been met.

MITIGATION MEASURE I: GREENHOUSE GASES

The project is required to incorporate the following Tier 1 Best Management Practices (BMPs)

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

MITIGATION MEASURE COMPLIANCE

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

1. The proponent shall comply with the MMRP for this project, including the payment of a fee to cover Planning and Environmental Review staff costs incurred during implementation of the MMRP. The MMRP fee for this project is \$8,600.00. This fee includes administrative costs of \$948.00.
2. Until the MMRP has been recorded and the administrative portion of the MMRP fee has been paid, no final parcel map or final subdivision map for the subject property shall be approved. Until the balance of the MMRP fee has been paid, no encroachment, grading, building, sewer connection, water connection or occupancy permit from Sacramento County shall be approved.

INITIAL STUDY CHECKLIST

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

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

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
1. LAND USE - Would the project:					
a. Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			X		The project is requesting a Zoning Agreement Amendment to permit the self storage facility within the SC (Shopping Center) Zone. With approval of the amendment the project is consistent with environmental policies of the Sacramento County General Plan, Cordova Community Plan, and the Sacramento County Zoning Code. Specific, environmental-related policies are discussed elsewhere in this document under the appropriate topical heading.
b. Physically disrupt or divide an established community?			X		The project will not create physical barriers that substantially limit movement within or through the community.
2. POPULATION/HOUSING - Would the project:					
a. Induce substantial unplanned population growth in an area either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of infrastructure)?			X		The project will neither directly nor indirectly induce substantial unplanned population growth; the proposal is consistent with existing land use designations.
b. Displace substantial amounts of existing people or housing, necessitating the construction of replacement housing elsewhere?			X		The project will not result in the removal of existing housing, and thus will not displace substantial amounts of existing housing.
3. AGRICULTURAL RESOURCES - Would the project:					
a. Convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance or areas containing prime soils to uses not conducive to agricultural production?				X	The project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on the current Sacramento County Important Farmland Map published by the California Department of Conservation. The site does not contain prime soils.
b. Conflict with any existing Williamson Act contract?				X	No Williamson Act contracts apply to the project site.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
c. Introduce incompatible uses in the vicinity of existing agricultural uses?				X	The project does not occur in an area of agricultural production.
4. AESTHETICS - Would the project:					
a. Substantially alter existing viewsheds such as scenic highways, corridors or vistas?			X		The project does not occur in the vicinity of any scenic highways, corridors, or vistas.
b. In non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings?			X		The project is not located in a non-urbanized area.
c. If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X		It is acknowledged that aesthetic impacts are subjective and may be perceived differently by various affected individuals. Nonetheless, given the urbanized environment in which the project is proposed, it is concluded that the project would not substantially degrade the visual character or quality of the project site or vicinity.
d. Create a new source of substantial light, glare, or shadow that would result in safety hazards or adversely affect day or nighttime views in the area?			X		The project will not result in a new source of substantial light, glare or shadow that would result in safety hazards or adversely affect day or nighttime views in the area.
5. AIRPORTS - Would the project:					
a. Result in a safety hazard for people residing or working in the vicinity of an airport/airstrip?				X	The project occurs outside of any identified public or private airport/airstrip safety zones.
b. Expose people residing or working in the project area to aircraft noise levels in excess of applicable standards?				X	The project occurs outside of any identified public or private airport/airstrip noise zones or contours.
c. Result in a substantial adverse effect upon the safe and efficient use of navigable airspace by aircraft?				X	The project does not affect navigable airspace.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
d. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				X	The project does not involve or affect air traffic movement.
6. PUBLIC SERVICES - Would the project:					
a. Have an adequate water supply for full buildout of the project?			X		The water service provider has adequate capacity to serve the water needs of the proposed project.
b. Have adequate wastewater treatment and disposal facilities for full buildout of the project?			X		The Sacramento Regional County Sanitation District has adequate wastewater treatment and disposal capacity to service the proposed project.
c. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?			X		The Kiefer Landfill has capacity to accommodate solid waste until the year 2050.
d. Result in substantial adverse physical impacts associated with the construction of new water supply or wastewater treatment and disposal facilities or expansion of existing facilities?			X		Minor extension of infrastructure would be necessary to serve the proposed project. Existing service lines are located within existing roadways and other developed areas, and the extension of lines would take place within areas already proposed for development as part of the project. No significant new impacts would result from service line extension.
e. Result in substantial adverse physical impacts associated with the provision of storm water drainage facilities?			X		Minor extension of infrastructure would be necessary to serve the proposed project. Existing stormwater drainage facilities are located within existing roadways and other developed areas, and the extension of facilities would take place within areas already proposed for development as part of the project. No significant new impacts would result from stormwater facility extension.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
f. Result in substantial adverse physical impacts associated with the provision of electric or natural gas service?			X		Minor extension of utility lines would be necessary to serve the proposed project. Existing utility lines are located along existing roadways and other developed areas, and the extension of lines would take place within areas already proposed for development as part of the project. No significant new impacts would result from utility extension.
g. Result in substantial adverse physical impacts associated with the provision of emergency services?			X		The project would incrementally increase demand for emergency services, but would not cause substantial adverse physical impacts as a result of providing adequate service.
h. Result in substantial adverse physical impacts associated with the provision of public school services?			X		The project will not require the use of public school services.
i. Result in substantial adverse physical impacts associated with the provision of park and recreation services?			X		The project will not require park and recreation services.
7. TRANSPORTATION - Would the project:					
a. Conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) – measuring transportation impacts individually or cumulatively, using a vehicles miles traveled standard established by the County?			X		Analysis prepared by Sacramento DOT indicates that the expected trip generation from the proposed use would result in less than 237 trips per day, and as such, screens out from requiring further analysis as a small project. . Therefore, project impacts individually or cumulatively are less than significant.
b. Result in a substantial adverse impact to access and/or circulation?			X		The project will be required to comply with applicable access and circulation requirements of the County Improvement Standards and the Uniform Fire Code. Upon compliance, impacts are less than significant.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
c. Result in a substantial adverse impact to public safety on area roadways?			X		The project will be required to comply with applicable access and circulation requirements of the County Improvement Standards and the Uniform Fire Code. Upon compliance, impacts are less than significant.
d. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?			X		The project does not conflict with alternative transportation policies of the Sacramento County General Plan, with the Sacramento Regional Transit Master Plan, or other adopted policies, plans or programs supporting alternative transportation.
8. AIR QUALITY - Would the project:					
a. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?			X		The project does not exceed the screening thresholds established by the Sacramento Metropolitan Air Quality Management District and will not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment.
b. Expose sensitive receptors to pollutant concentrations in excess of standards?			X		See Response 8.a.
c. Create objectionable odors affecting a substantial number of people?			X		The project will not generate objectionable odors.
9. NOISE - Would the project:					
a. Result in generation of a temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established by the local general plan, noise ordinance or applicable standards of other agencies?			X		The project is not in the vicinity of any uses that generate substantial noise, nor will the completed project generate substantial noise. The project will not result in exposure of persons to, or generation of, noise levels in excess of applicable standards.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
b. Result in a substantial temporary increase in ambient noise levels in the project vicinity?			X		Project construction will result in a temporary increase in ambient noise levels in the project vicinity. This impact is less than significant due to the temporary nature of the these activities, limits on the duration of noise, and evening and nighttime restrictions imposed by the County Noise Ordinance (Chapter 6.68 of the County Code).
c. Generate excessive groundborne vibration or groundborne noise levels.			X		The project will not involve the use of pile driving or other methods that would produce excessive groundborne vibration or noise levels at the property boundary.
10. HYDROLOGY AND WATER QUALITY - Would the project:					
a. Substantially deplete groundwater supplies or substantially interfere with groundwater recharge?			X		The project will not rely on groundwater supplies and will not substantially interfere with groundwater recharge.
b. Substantially alter the existing drainage pattern of the project area and/or increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?			X		Compliance with applicable requirements of the Sacramento County Floodplain Management Ordinance, Sacramento County Water Agency Code, and Sacramento County Improvement Standards will ensure that impacts are less than significant.
c. Develop within a 100-year floodplain as mapped on a federal Flood Insurance Rate Map or within a local flood hazard area?			X		The project is not within a 100-year floodplain as mapped on a federal Flood Insurance Rate Map, nor is the project within a local flood hazard area.
d. Place structures that would impede or redirect flood flows within a 100-year floodplain?			X		The project site is not within a 100-year floodplain.
e. Develop in an area that is subject to 200 year urban levels of flood protection (ULOP)?				X	The project is not located in an area subject to 200-year urban levels of flood protection (ULOP).
f. Expose people or structures to a substantial risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?			X		The project will not expose people or structures to a substantial risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
g. Create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems?			X		Adequate on- and/or off-site drainage improvements will be required pursuant to the Sacramento County Floodplain Management Ordinance and Improvement Standards.
h. Create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality?			X		Compliance with the Stormwater Ordinance and Land Grading and Erosion Control Ordinance (Chapters 15.12 and 14.44 of the County Code respectively) will ensure that the project will not create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality.
11. GEOLOGY AND SOILS - Would the project:					
a. Directly or indirectly cause potential substantial adverse effects, including risk of loss, injury or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?			X		Sacramento County is not within an Alquist-Priolo Earthquake Fault Zone. Although there are no known active earthquake faults in the project area, the site could be subject to some ground shaking from regional faults. The Uniform Building Code contains applicable construction regulations for earthquake safety that will ensure less than significant impacts.
b. Result in substantial soil erosion, siltation or loss of topsoil?			X		Compliance with the County's Land Grading and Erosion Control Ordinance will reduce the amount of construction site erosion and minimize water quality degradation by providing stabilization and protection of disturbed areas, and by controlling the runoff of sediment and other pollutants during the course of construction.
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, soil expansion, liquefaction or collapse?			X		The project is not located on an unstable geologic or soil unit.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
d. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available?			X		A public sewer system is available to serve the project.
e. Result in a substantial loss of an important mineral resource?				X	The project is not located within an Aggregate Resource Area as identified by the Sacramento County General Plan Land Use Diagram, nor are any important mineral resources known to be located on the project site.
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X		No known paleontological resources (e.g. fossil remains) or sites occur at the project location.
12. BIOLOGICAL RESOURCES - Would the project:					
a. Have a substantial adverse effect on any special status species, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, or threaten to eliminate a plant or animal community?		X			The project site contains suitable habitat for VELB. However, no elderberry plants are to be disturbed or removed. Refer to the Biological Resources discussion in the Environmental Effects section above.
b. Have a substantial adverse effect on riparian habitat or other sensitive natural communities?		X			The project site contains suitable habitat for VELB. However, no elderberry plants are to be disturbed or removed. The site also contains potential nesting habitat for raptors and migratory birds. Refer to the Biological Resources discussion in the Environmental Effects section above.
c. Have a substantial adverse effect on streams, wetlands, or other surface waters that are protected by federal, state, or local regulations and policies?				X	No protected surface waters are located on or adjacent to the project site.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
d. Have a substantial adverse effect on the movement of any native resident or migratory fish or wildlife species?		X			The project site is developed with parking areas and a building pad with a wooded area to the north of the developed area. Project construction of three buildings would have a temporary impact on native resident or migratory species that could nest in adjacent trees.
e. Adversely affect or result in the removal of native or landmark trees?		X			Native and/or landmark trees occur on the project site; however, the project will not impact these trees. Refer to the Biological Resources discussion in the Environmental Effects section above.
f. Conflict with any local policies or ordinances protecting biological resources?			X		The project is consistent with local policies/ordinances protecting biological resources.
g. Conflict with the provisions of an adopted Habitat Conservation Plan or other approved local, regional, state or federal plan for the conservation of habitat?			X		There are no known conflicts with any approved plan for the conservation of habitat.
13. CULTURAL RESOURCES - Would the project:					
a. Cause a substantial adverse change in the significance of a historical resource?			X		No historical resources would be affected by the proposed project.
b. Have a substantial adverse effect on an archaeological resource?			X		The Northern California Information Center was contacted regarding the proposed project. A record search indicated that the project site is not considered sensitive for archaeological resources.
c. Disturb any human remains, including those interred outside of formal cemeteries?		X			No known human remains exist on the project site. Nonetheless, mitigation has been recommended to ensure appropriate treatment should remains be uncovered during project implementation.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
14. TRIBAL CULTURAL RESOURCES - Would the project:					
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074?			X		Notification pursuant to Public Resources Code 21080.3.1(b) was provided to the tribes and no requests for consultation were received. Tribal cultural resources have not been identified in the project area. Nonetheless, mitigation has been recommended to ensure appropriate treatment should resources are uncovered during project implementation.
15. HAZARDS AND HAZARDOUS MATERIALS - Would the project:					
a. Create a substantial hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X		The project does not involve the transport, use, and/or disposal of hazardous material.
b. Expose the public or the environment to a substantial hazard through reasonably foreseeable upset conditions involving the release of hazardous materials?			X		The project does not involve the transport, use, and/or disposal of hazardous material.
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?			X		The project does not involve the use or handling of hazardous material.
d. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, resulting in a substantial hazard to the public or the environment?			X		The project is not located on a known hazardous materials site.
e. Impair implementation of or physically interfere with an adopted emergency response or emergency evacuation plan?			X		The project would not interfere with any known emergency response or evacuation plan.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
f. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to or intermixed with urbanized areas?			X		The project is within the urbanized area of the unincorporated County. There is no significant risk of loss, injury, or death to people or structures associated with wildland fires.
16. ENERGY – Would the project:					
a. Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction?			X		The project is the development of a self-storage facility and office space and increase energy consumption, compliance with Title 24, Green Building Code, will ensure that all project energy efficiency requirements are met resulting in less than significant impacts.
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X		The project will comply with Title 24, Green Building Code, for all project efficiency requirements.
17. GREENHOUSE GAS EMISSIONS – Would the project:					
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X		The California Emissions Estimator Model (CalEEMod) was used to estimate the greenhouse gas emissions associated with the project. Based on the results, the established County threshold of 1,100 annual metric tons of CO ₂ e for the commercial/industrial energy and/or transportation sector of the proposed project will not be exceeded.
b. Conflict with an applicable plan, policy or regulation for the purpose of reducing the emission of greenhouse gases?			X		The project is consistent with County policies adopted for the purpose of reducing the emission of greenhouse gases.

SUPPLEMENTAL INFORMATION

LAND USE CONSISTENCY	Current Land Use Designation	Consistent	Not Consistent	Comments
General Plan	COMM/OFF	X		
Community Plan	SC	X		With the approval of Zoning Agreement Amendment
Land Use Zone	SC	X		With the approval of Zoning Agreement Amendment

APPENDICIES:

Appendix A: August 24, 2021. California Tree and Landscape Consulting, Inc. (CaTLC). Pre-Development Report & Tree Inventory (Arborist Report)

Appendix B: November 19, 2021. California Tree and Landscape Consulting, Inc. (CaTLC). Supplement to Arborist Report.

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