# Environmental Assessment Determinations and Compliance Findings for HUD-assisted Projects 24 CFR Part 58

# **Project Information**

Project Name: Villa Jardin and Coral Gables Project

**Responsible Entity:** Sacramento Housing and Redevelopment Agency

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Certifying Officer Name and Title: La Shelle Dozier, Executive Director, Sacramento Housing

and Redevelopment Agency

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# **Project Location:**

Villa Jardin Apartments: 2701 Meadowview Road, Sacramento, CA 95832. Located approximately 1,000 feet east of the intersection of 24<sup>th</sup> Street and Meadowview Road. Sacramento County Assessor Parcel Numbers (APNs): 049-0250-034 and 019-0250-033.

Coral Gables: 49, 63, and 81 Coral Gables Court, Sacramento, CA 95822. Located at the western terminus of Coral Gables Court.

Sacramento County APNs: 049-0250-027, 049-0250-028, and 049-0250-035.

# **Description of the Proposed Project** [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

The Proposed Project would consist of two components: the construction of 38 affordable housing units and a community center building (the Coral Gables new construction Project); and the rehabilitation of the existing 44-unit Villa Jardin apartment complex (the Villa Jardin rehabilitation Project). Combined, the Project Site contains five contiguous parcels, totaling 2.32 acres, located north of Meadowview Road and west of Coral Gables Court. A Regional Location Map and a Project Location Map are provided respectively as **Figure 1** and **Figure 2**. A detailed Site Plan of the Proposed Project is provided as **Figure 3** with a bird's eye conceptual rendering of the Project available as **Figure 4**. Specifically, the Villa Jardin apartment complex is located approximately 1,000 feet east of the intersection of 24th Street and Meadowview Road at 2701 Meadowview Road in the City of Sacramento, Sacramento County, California. The proposed location of the Coral Gables new construction Project is the western terminus of Coral Gables Court, and consists of vacant parcels located directly north of the existing Villa Jardin Apartments. The addresses for the parcels that make up the Coral Gables Project Site are 49, 63, and 81 Coral Gables Court in Sacramento, California.

#### Coral Gables Project

The Coral Gables Project would involve development of three multifamily residential buildings containing 38 affordable housing units, a community center building, and an open space area with play equipment; development would occur across three vacant parcels, as well as a portion of the parcels containing the Villa Jardin apartments. The residential units would include 18 onebedroom/one-bathroom units and 20 two-bedroom/one-bathroom units. The three proposed residential structures would be three stories tall and are planned to be located on the northern and western portions of the Project Site. The northern building would contain 20 one- and twobedroom units (displayed in Figure 5). The buildings on the western portion of the Project Site would each include one- and two-bedroom units (displayed in Figure 6). As shown in Figure 5 and Figure 6, these structures would be constructed in a traditional style with gabled rooflines, articulated elevations, contrasting siding colors, and exterior staircases accessing the upper floors. The Coral Gables Project would include a community center building and an open space area that would be shared with the Villa Jardin apartments immediately to the south (displayed in Figure 7). The single-level community center building would contain common space, property management offices, services spaces, bathrooms, a laundry room, and a community kitchen. The open space area immediately north and west of the community center building would include two playgrounds for children ages 2-5 and ages 5-12. The common area would include a lawn west of Coral Gables Court; climbing blocks and a DNA-shaped climbing structure on the north side of the lawn; and half balls, mule, dance chimes, and a stone abacus on the south side of the lawn. The

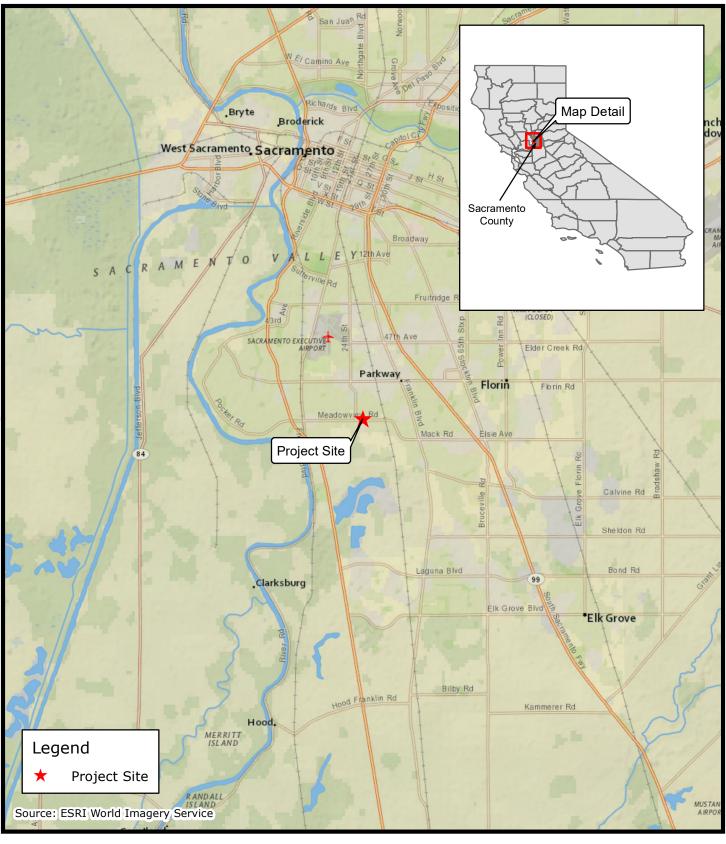
climbing equipment would be surrounded by a rubberized surface. The community center would have a contemporary design with an angled roof, exposed roof trusses, and tall windows facing the playgrounds and lawn, as shown in **Figure 7**. A bench and picnic tables would be located between the lawn and Coral Gables Court, with a low wall and fence separating the picnic and play area from Coral Gables Court. Two pedestrian fences would allow access to the sidewalk along Coral Gables Court.

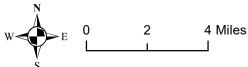
Due to an existing vapor-intrusion condition at the subject property, the Project includes soil vapor barriers placed beneath each of the proposed buildings in the Coral Gables development. The vapor barriers would address potential health concerns associated with soil vapor intrusion for both 1,3 butadiene and benzene, as well as chlorinated hydrocarbons, and would include a triple-layer nitrile composite barrier system. The existing vapor-intrusion condition on the Project Site, as well as the proposed vapor barriers, are discussed below.

The Project Site is relatively flat and would not require extensive grading to prepare for construction of the proposed residential structures. Total grading quantities are anticipated to include approximately 400 cubic yards of cut and zero cubic yards of fill. As such, the grading quantities are anticipated to result in approximately 400 cubic yards of soil export.

The proposed residential structures would be arranged in a grid pattern, with landscaped, common open spaces, and concrete walkways in between the structures. Common space areas would be planted with drought-tolerant landscaping and shade trees. The north side of the Project Site would contain a surface parking lot with 26 uncovered parking spaces (including two spaces with electric vehicle charging infrastructure) and 12 tuck-under parking spaces below the two-bedroom housing units (including four spaces compliant with the Americans with Disabilities Act [ADA]), for a total of 38 parking spaces. The parking lot would include a gated trash enclosure near the entrance gate, as well as a bicycle storage area on the northeast corner of the Project Site. Access to the parking lot would be through a single gated ingress and egress point onto Coral Gables Court. The entrance gate would be remote controlled and would provide vehicle access to residents and employees. Transportation network companies (such as Uber and Lyft) would use the cul-de-sac at the end of Coral Gables Court. Pedestrians would access the Site from the sidewalk along Coral Gables Court.

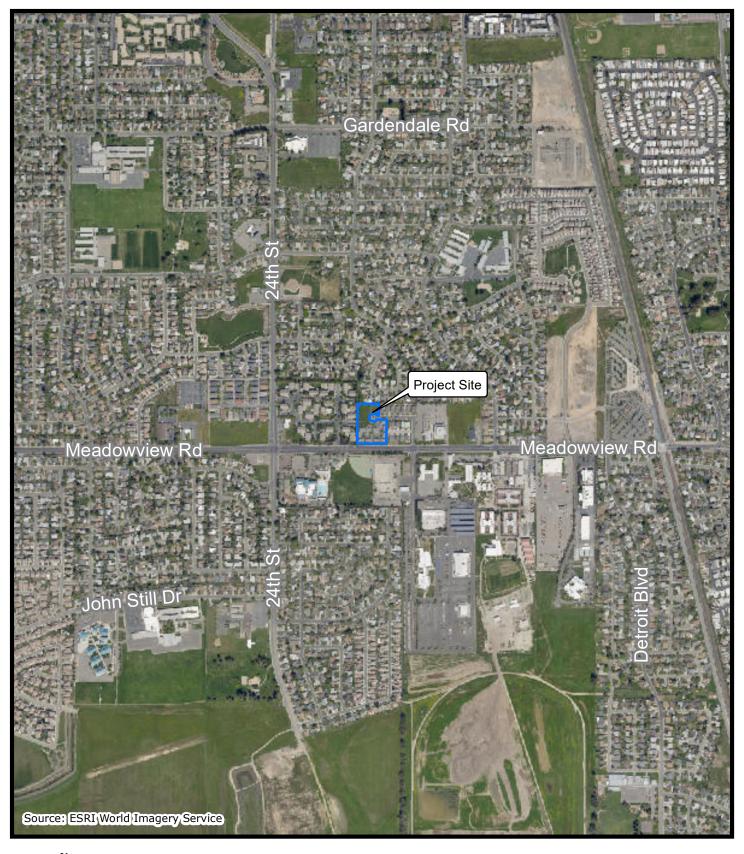
The Coral Gables Project Site boundary would be lined with trees, providing a landscape buffer between the Proposed Project and the single-family and multifamily residential uses surrounding the Project Site. Tree species native to California, such as coast live oaks and valley oaks, would be planted throughout the Project Site to provide shade in the common areas and parking lots. The proposed landscape plan is provided in **Figure 8.** 

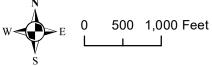




**FIGURE 1** Regional Location Map



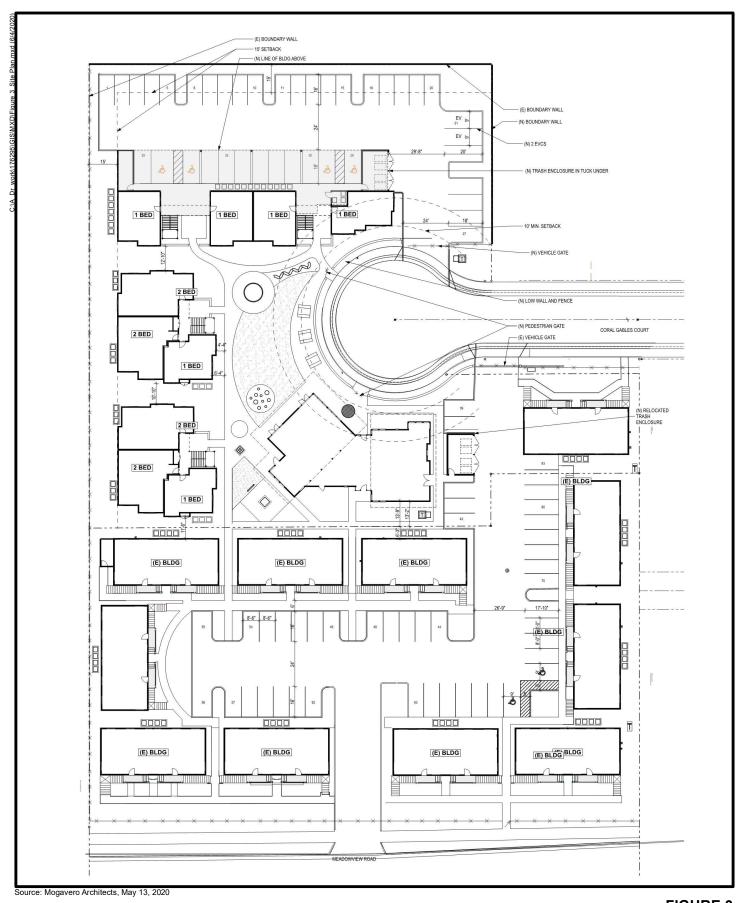


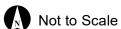


# FIGURE 2

Project Location Map

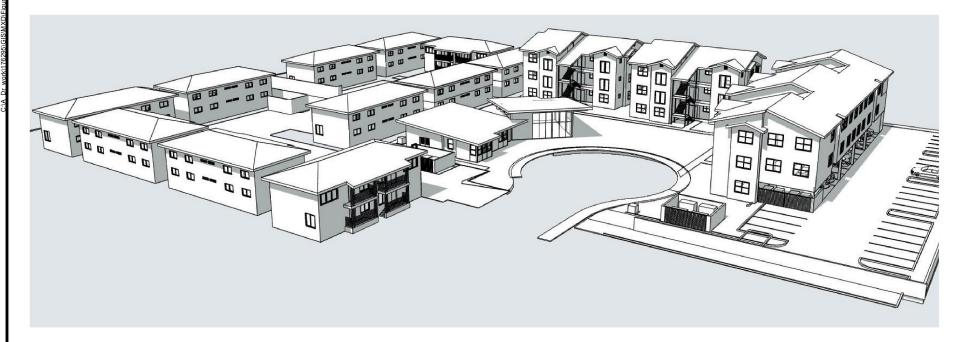












Bird's eye view of the Project looking southwest

FIGURE 4

Conceptual Project Rendering





FIGURE 5

Coral Gables Building A: Elevation and Floor Plan





FIGURE 6

Coral Gables Building B and C: Elevation and Floor Plan



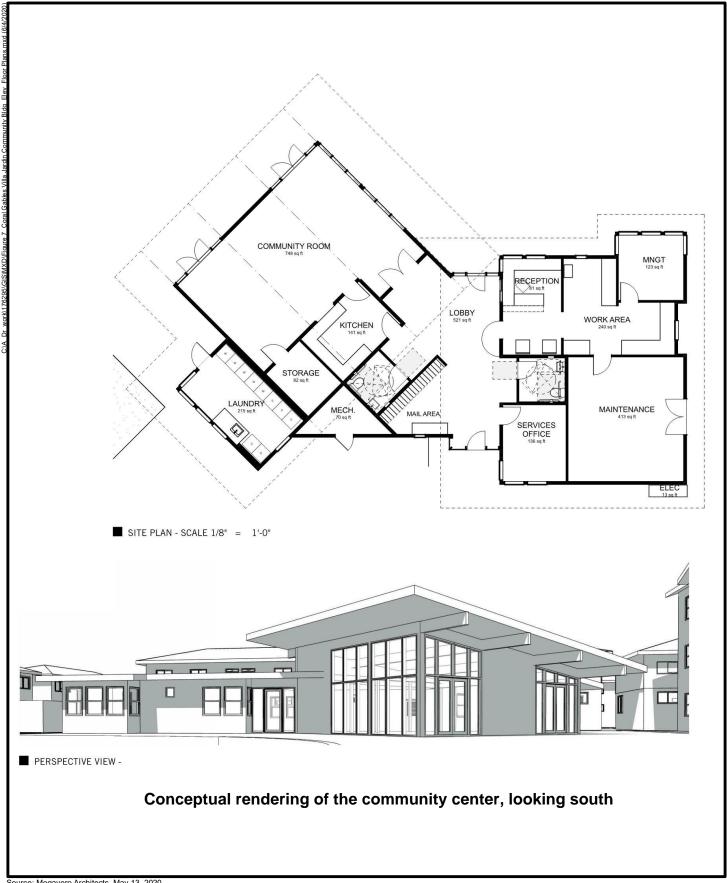
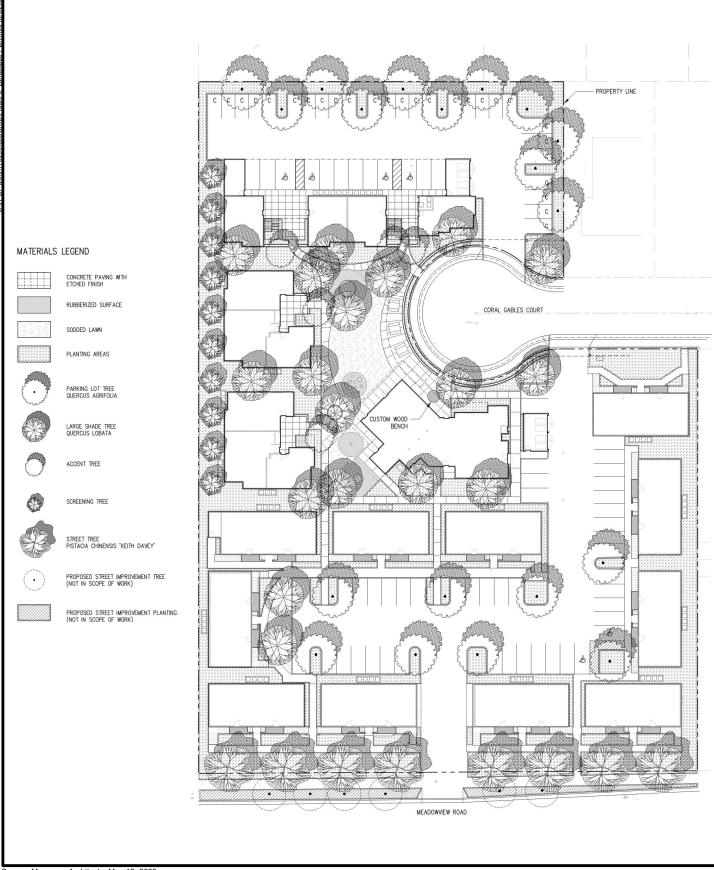


FIGURE 7

Coral Gables and Villa Jardin Community Building: Elevation and Floor Plan





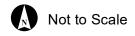


FIGURE 8 Landscape Plan



#### Villa Jardin Project

The Villa Jardin Project would consist of rehabilitation of an existing apartment complex consisting of 44 two-bedroom/one-bathroom affordable housing units. Physically, the complex consists of 11 two-story buildings arranged around an L-shaped surface parking lot, with each building containing four units. Access to the parking lot, which contains 44 parking spaces, is provided via a driveway onto Coral Gables Court. A gated, seldom-used driveway also connects the parking lot to Meadowview Road.

Rehabilitation activities within the units would include installation of new flooring, window coverings, kitchen and bath cabinets, kitchen countertops, appliances (e.g., electric ranges, refrigerators, and dishwashers), toilets, bathtubs, bathroom sinks and fans, gas wall furnaces, air conditioning units, and smoke/carbon monoxide alarms, as necessary. Rehabilitation work on the 11 residential structures would include repairing dry rot, cement plaster, and exterior stairs; replacing all stair railings, electrical panelboard, and exterior lighting; drywall repairs; asbestos abatement; replacing the majority (75 percent) of the windows in the community with dual pane, energy-efficient windows; replacing the roof on all 11 buildings; replacing all exterior entry doors; and making alterations to make the manager's office an ADA-compliant/accessible unit. The Project would replace all of the windows in the four buildings on the southern side of the Project Site, nearest Meadowview Road, so as to reduce roadway noise for Project inhabitants.

Other rehabilitation work on the Site would include new overlay asphalt paving in the parking area; landscape, irrigation, and sewer repairs; installation of a new closed-circuit television (CCTV) system; new vehicular and pedestrian gates; and a new entry access system. A row of eight street trees (Keith Davey Chinese pistache trees) would be planted between the four buildings on the south side of the Project Site and Meadowview Road, as shown in **Figure 8**. The rehabilitation of the Villa Jardin Apartments would also involve planting two large shade trees (valley oak trees) on the west side of the Project Site and shade trees in the parking area (coast live oak trees).

### **Statement of Purpose and Need for the Proposal** [40 CFR 1508.9(b)]:

The Sacramento Housing and Redevelopment Agency (SHRA) was created to ensure the ongoing development of affordable housing and to continuously fuel community redevelopment projects in the City and County of Sacramento. Specifically, a goal of the SHRA, as identified in the 2017 SHRA Annual Report, is to "develop, preserve, and finance a continuum of affordable housing opportunities for Sacramento City and County residents." The Proposed Project contributes toward this goal by constructing new affordable housing and rehabilitating existing affordable housing, which would provide low- and moderate-income housing opportunities for people living in Sacramento City and County who do not have incomes or financial means to afford conventional, market-rate residential units.

Further, the City of Sacramento's General Plan Housing Element states that approximately 48 percent of the households in the City are extremely low-, very low-, or low-income households. By providing affordable housing, the Project is addressing a need for affordable housing, as identified in the City's General Plan.

<sup>&</sup>lt;sup>1</sup> Sacramento Housing and Redevelopment Agency, Changing Lives: 2017 Annual Report, Page 5.

# **Existing Conditions and Trends** [24 CFR 58.40(a)]:

As stated above, the Villa Jardin apartment complex is located approximately 1,000 feet east of the intersection of 24th Street and Meadowview Road at 2701 Meadowview Road in the City of Sacramento, Sacramento County, California. The proposed location of the Coral Gables new construction Project is the western terminus of Coral Gables Court, and consists of vacant parcels located directly north of the existing Villa Jardin apartments. The addresses for the parcels that make up the Coral Gables Project Site are 49, 63, and 81 Coral Gables Court in Sacramento, California.

The existing Villa Jardin apartment complex consists of 11 buildings oriented around a L-shaped surface parking lot, each containing four two-bedroom units. The two parcels that make up the Villa Jardin apartment complex total 1.45 acres and are located on the south side of the Project Site. Each of the 11 buildings is clad in light pink stucco, with field stone accents on the building corners. Each unit has an exterior entry point, with second-level units accessed through outdoor, covered walkways and staircases. The property contains sidewalks extending from the L-shaped parking lot. The area between the units and Meadowview Road is characterized by turf grass and a black metal fence. The parking lot is accessed via a gated driveway on Coral Gables Court on the north side of the property. An open space area with playground equipment is located on the north side of the Villa Jardin property, which is surrounded by the same black metal fencing that extends along the Meadowview Road property frontage.

The Coral Gables property is irregularly shaped and consists of three adjoining parcels with a combined area of 0.87 acres; it is located immediately north of the Villa Jardin property and west of the terminus of Coral Gables Court. The Site is vacant and characterized by seasonal grasses, with sporadic shrubs and trees that vary in size, species, and health. The Site is bound by the black metal fencing of Villa Jardin to the south, a masonry wall to the west, a wooden fence and masonry wall to the north, and a chain-link fence topped with barbed wire to the east. A chain-link fence extends across the southern and eastern portions of the Coral Gables property, dividing the property into three sections.

# **Funding Information**

The Proposed Project would be funded by Project-based vouchers (PBVs). These funds are obligated by HUD to the SHRA under its annual contributions contract. The vouchers would cover portions of the rent of the proposed residential units by covering the difference between 30 percent of family income and the gross rent for the unit. The developer and the SHRA will enter into a housing assistance payment (HAP) contract, under which the owner agrees to construct and rehabilitate the units in the Proposed Project and the SHRA agrees to subsidize the units upon satisfactory completion of the rehabilitation and construction. The value of the PBVs for the Coral Gables component of the Proposed Project is based on the annual federal funding received over the 20-year HAP contract.

<b>Grant Number</b>	HUD Program	<b>Funding Amount</b>
N/A	Project-Based Vouchers for	\$9,639,327
	Coral Gables Project	

**Estimated Total HUD Funded Amount:** \$9,639,327

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$32,482,300

# Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, Exand 58.6	XECUTIVE (	ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4
Airport Hazards  24 CFR Part 51 Subpart D	Yes No	HUD guidance states that if a project consists of new construction or other activities that would increase the density of people at the Project Site, then an environmental assessment must demonstrate that the Project is greater than 2,500 feet from a civilian airport or 15,000 feet from a military airport. According to HUD, if a project is within these distances, then additional design measures may be necessary to protect project inhabitants.  The closest military airport to the Project Site is the Coast Guard Air Station Sacramento at McClellan Airfield, located approximately 12 miles (63,357 feet) northeast of the Project Site. The closest civilian airport is the Sacramento Executive Airport, located approximately 1.78 miles (9,413 feet) northwest of the Project Site. The Project Site is located greater than 15,000 feet from a military airport and greater than 2,500 feet from of civilian airport. Therefore, the Project is in compliance with this section.
		References:  Attached map showing location of Sacramento Executive Airport in relation to the Project Site.  HUD, HUD Exchange: Airport Hazards, <a href="https://www.hudexchange.info/environmental-review/airport-hazards/">https://www.hudexchange.info/environmental-review/airport-hazards/</a> , accessed May 19, 2020.

Coastal Barrier Resources  Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes	No 	The Coastal Barrier Resources Act prohibits federal assistance within barrier islands that are subject to frequent damage by hurricanes and high storm surges. There are no Coastal Barrier Resources identified by the U.S. Fish and Wildlife Service within the State of California. Therefore, the Project is compliant with the Coastal Barrier Resources Act.  References:  U.S. Fish and Wildlife Service, Coastal Barrier Resources System, CBRS Mapping Projects by State, https://www.fws.gov/CBRA/Maps/Mapper.html, accessed December 27, 2019.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes	No 	The Proposed Project would involve rehabilitation of existing housing and construction of new housing and an associated community space in the City of Sacramento. According to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map (FIRM) for the Project area, the Project Site is not within a Special Flood Hazard Area as designated by FEMA. The Project Site is located in an area designated as Zone X, which is an "area of minimal flood risk." As such, the Project does not require flood insurance and no further evaluation is necessary.  References:  FEMA, Flood Insurance Rate Map (FIRM) 06067C0305H.
STATUTES, EX	XECU'	TIVE (	ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes	No 🖂	<ul> <li>The analysis in this section is informed, in part, by the Air Quality Technical Memorandum prepared for this Project by Michael Baker International, June 2020. This technical memorandum is available in the Environmental Review Record.</li> <li>To demonstrate consistency with HUD guidance on air quality, HUD requires that the Environmental Review Record contain one of the following:         <ul> <li>A determination that the project does not include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities or five or more dwelling units;</li> <li>Documentation that the project's county or air quality management district is not in nonattainment or maintenance status for any criteria pollutants;</li> <li>Evidence that estimated emissions levels for the project do not exceed de minimis emissions levels for the nonattainment or maintenance level pollutants; or</li> <li>A determination that the project can be brought into compliance with the State Implementation Plan (SIP) through</li> </ul> </li> </ul>

modification or mitigation, including documentation on how the project can be brought into compliance.

The Project Site is located within the Sacramento Valley Air Basin (Basin). The Sacramento Metropolitan Air Quality Management District (SMAQMD) has jurisdiction in the Basin, which has a history of recorded air quality violations and is an area where both state and federal ambient air quality standards are exceeded. Areas that meet ambient air quality standards are classified as attainment areas, while areas that do not meet these standards are classified as nonattainment areas. The SMAQMD is required, pursuant to the federal Clean Air Act (CAA), to reduce emissions of the air pollutants for which the Basin is in nonattainment. The Basin is designated nonattainment area for the federal and state 8-hour ozone (O<sub>3</sub>) standard, federal 24-hour particulate matter 2.5 microns in diameter or less (PM<sub>2.5</sub>) standard, and the state annual particulate matter 10 microns in diameter or less (PM<sub>10</sub>) standard. As such, under the CAA, the SMAQMD has adopted federal attainment plans for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. The Sacramento Regional 2008 NAAQS 8-Hour Ozone Attainment and Reasonable Further Progress Plan, which addresses attainment of the federal 8hour ozone standard, and the 2015 Triennial Report and Plan Revision, are the current plans required by U.S. Environmental Protection Agency (USEPA) and California Air Resources Board (CARB) and issued by the SMAQMD to meet attainment. These plans need to demonstrate reasonable progress toward attainment as required by the SIP and the California Clean Air Act. To demonstrate compliance with these plans, the analysis of the Project must incorporate the land use assumptions and travel demand modeling from the Sacramento Area Council of Governments (SACOG). To determine compliance with the applicable air quality plan, the SMAQMD recommends, as inferred by the SIP, comparing the Project's VMT and population growth rate to the SACOG growth projections included in the 2016 Metropolitan Transportation Plan/Sustainable Communities Strategy (2016 MTP/SCS).

Per guidelines set forth by HUD, because the Project Site is in a nonattainment area for  $O_3$ ,  $PM_{2.5}$  and  $PM_{10}$ , the Project must demonstrate conformity with the SIP. A project is shown to conform with the SIP if its criteria pollutant emissions remain below the local air district's significance thresholds and it is consistent with the local Air Quality Management Plan.

The Project's criteria pollutant emissions during short-term construction and long-term operations would remain below the SMAQMD regional thresholds of significance for criteria pollutants. Criteria pollutant emissions from construction and operation are outlined below.

#### **Construction Emissions**

The Project involves construction activities associated with grading, building construction, paving, and architectural coating applications

of the Coral Gables apartments. The Project would be constructed over approximately 14 months (between May 2021 and June 2022). Exhaust emission factors for typical diesel-powered heavy equipment are based on CalEEMod 2016.3.2 program defaults. Variables factored into estimating the total construction emissions include the level of activity, length of construction period, number of pieces and types of equipment in use, site characteristics, weather conditions, number of construction personnel, and the amount of materials to be transported on- or off-site. The analysis of daily construction emissions was prepared using CalEEMod. Short-term constructionrelated emissions, along with SMAQMD significance thresholds, are displayed in Table AQ-1, below. Reactive organic gases (ROG) and nitrogen oxides (NO<sub>x</sub>) are considered ozone precursors because they react with sunlight to create photochemical smog, or ozone. Therefore, ROG and NO<sub>x</sub> are included in the analysis of construction emissions as they contribute to  $O_3$  levels in the atmosphere.

Table AQ-1 Short-Term Construction Emissions

Emissions Source	Pollutant (pounds/day)¹				
Emissions Source	ROG	NOx	PM <sub>10</sub>	PM <sub>2.5</sub>	
Year 1					
Construction Related Emissions <sup>2</sup>	1.95	14.88	2.80	1.74	
Year 2					
Construction Related Emissions <sup>2</sup>	20.40	13.15	0.08	0.65	
SMAQMD Thresholds	None	85	80 <sup>2</sup>	82 <sup>3</sup>	
Is Threshold Exceeded?	Not Applicable	No	No	No	

#### Notes

Emissions were calculated using CalEEMod, version 2016.3.2.

- 1. Modeling assumptions include compliance with all feasible Best Available Control Technology and Best Management Practices (BMPs). This includes compliance with SMAQMD Rule 403 which requires the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces two times daily; cover stock piles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. This also includes compliance with the idling requirements found in California Code of Regulations, Title 13, Sections 2449(d)(3) and 2485, and California Code of Regulations Title 13, Sections 2449 and 2449.1 requiring certificate of compliance for CARB's In-Use Off-Road Diesel-Fueled Fleet Regulation.
- 2. If all feasible Best Available Control Technology/Best Management Practices are applied, then 80 lbs/day.
- 3. If all feasible Best Available Control Technology/Best Management Practices are applied, then 82 lbs/day.

Source: Refer to the Technical Memorandum prepared for this Project, for detailed model input/output data.

Construction activities are a source of fugitive dust emissions that may have a substantial, temporary impact on local air quality. In addition, fugitive dust may be a nuisance to those living and working in the project area. Fugitive dust emissions are associated with land clearing, ground excavation, cut-and-fill, and truck travel on unpaved roadways (including demolition as well as construction activities). Fugitive dust emissions vary substantially from day to day, depending on the level of activity, specific operations, and weather conditions. Fugitive dust from grading and construction is expected to be short term and would cease upon project completion. It should be noted that most of this material is inert silicates, rather than the complex organic particulates released from combustion sources, which are more harmful to health.

Dust (larger than 10 microns) generated by such activities usually becomes more of a local nuisance than a serious health problem. Of particular health concern is the amount of  $PM_{10}$  (particulate matter smaller than 10 microns) generated as a part of fugitive dust emissions.  $PM_{10}$  poses a serious health hazard alone or in combination with other pollutants.  $PM_{2.5}$  is mostly produced by mechanical processes. These include automobile tire wear, industrial processes such as cutting and grinding, and resuspension of particles from the ground or road surfaces by wind and human activities such as construction or agriculture.  $PM_{2.5}$  is mostly derived from combustion sources, such as automobiles, trucks, and other vehicle exhaust, as well as from stationary sources.

Construction activities would comply with the SMAQMD-required best available control technology (BACT) and best management practices (BMPs), which include SMAQMD Rule 403. SMAQMD Rule 403 requires that excessive fugitive dust emissions be controlled by regular watering or other dust prevention measures. BMPs also include compliance with California Code of Regulations, Title 13, Sections 2449(d)(3) and 2485, which require that idling time is minimized either by shutting equipment off when not in use or reducing the time of idling to 5 minutes. Adherence with the SMAQMD BMPs, SMAQMD Rule 403, and the California Code of Regulations, Title 13, Sections 2449(d)(3) and 2485 would greatly reduce PM<sub>10</sub> and PM<sub>2.5</sub> concentrations. As shown in **Table AQ-1**, emissions of PM<sub>10</sub> and PM<sub>2.5</sub> would be less than the SMAQMD's designated significance thresholds.

#### Construction Equipment and Vehicle Exhaust

Exhaust emissions (e.g.,  $NO_x$ ) from construction activities include emissions associated with the transport of machinery and supplies to and from the Project Site, emissions produced on-site as the equipment is used, and emissions from trucks transporting materials to/from the Site. As presented in **Table AQ-1**, construction equipment and worker vehicle exhaust  $NO_x$  emissions would be below the established SMAQMD thresholds.

#### Construction ROG Emissions

In addition to gaseous and particulate emissions, the application of asphalt and surface coatings creates ROG emissions, which are O<sub>3</sub> precursors. As required, all architectural coatings for the Proposed Project structures would comply with SMAQMD Rule 442 (Architectural Coatings) and Rule 453 (Cutback and Emulsified Asphalt Paving Materials). Rule 442 provides specifications on painting practices as well as regulating the ROG content of paint, while Rule 453 regulates the volatile organic compounds (VOC) content of paving materials. ROG emissions associated with the Proposed Project would be less than significant, as displayed in **Table AQ-1**.

#### Total Daily Construction Emissions

In summary, and as displayed in **Table AQ-1**, construction-related emissions of ROG, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> are all below SMAQMD significance thresholds.

#### Asbestos

Asbestos is a term used for several types of naturally occurring fibrous minerals that are a human health hazard when airborne. The most common type of asbestos is chrysotile, but other types such as tremolite and actinolite are also found in California. Asbestos is classified as a known human carcinogen by state, federal, and international agencies and was identified as a toxic air contaminant by CARB in 1986. Asbestos can be released from serpentinite and ultramafic rocks when the rock is broken or crushed. At the point of release, the asbestos fibers may become airborne, causing air quality and human health hazards. As stated in the Air Quality Technical Memorandum prepared for this Project, serpentinite and ultramafic rocks are not known to occur within the Project area and, therefore, there would be no impact in this regard.

#### **Operational Emissions**

Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, ROG, NO<sub>X</sub>, sulfur oxides, PM<sub>10</sub>, and PM<sub>2.5</sub> are all pollutants of regional concern; however, CO tends to be a localized pollutant, dispersing rapidly at the source. **Table AQ-2**, below, presents anticipated mobile source emissions.

Table AQ-2 Long-Term Operational Air Emissions

Emissions Source	Pollutant (lbs/day)¹					
Emissions Source	ROG	NO <sub>X</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>		
Summer Emissions <sup>2</sup>						
Area Source Emissions	1.11	0.04	0.02	0.02		
Energy Emissions	<0.01	0.09	<0.01	<0.01		

Mobile Emissions <sup>3</sup>	0.84	1.19	1.42	0.39
Total Emissions <sup>4</sup>	1.96	1.31	1.44	0.41
	1.50	1.31	1.44	0.41
Winter Emissions <sup>2</sup>				
Area Source Emissions	1.11	0.04	0.02	0.02
Energy Emissions	<0.01	0.09	<0.01	<0.01
Mobile Emissions <sup>3</sup>	0.72	1.33	1.42	0.39
Total Emissions⁴	1.84	1.46	1.44	0.41
SMAQMD Threshold	65	65	80	82
Is Threshold Exceeded?	No	No	No	No

#### Notes

- 1. Emissions were calculated using CalEEMod, version 2016.3.2.
- The "mitigated" emissions from CalEEMod were used as they take into account the mandatory requirements from the 2019 California Building Standards Code (Title 24) energy efficiency guidelines, 2019 CALGreen Code water efficiency guidelines, and AB 342 – solid waste diversion.
- 3. The mobile source emissions were calculated using the CalEEMod default trip generation values based off the land-use build out the 38 multi-family dwelling units.
- 4. The numbers may be slightly off due to rounding.

Source: Refer to the Air Quality Technical Memorandum prepared for this Project for detailed model input/output data.

In addition to mobile source emissions, **Table AQ-2** shows area source and energy emissions. Area source emissions would be generated from consumer products, architectural coatings, and landscaping. Energy source emissions would be generated as a result of electricity and natural gas (non-hearth) usage associated with the Proposed Project. The primary use of electricity and natural gas by the Project would be for space heating and cooling, water heating, ventilation, lighting, appliances, and electronics. In short, mobile source, area source, and energy source emissions from the Proposed Project would not exceed SMAQMD thresholds for ROG,  $NO_X$ ,  $PM_{10}$ , or  $PM_{2.5}$ .

Regarding carbon monoxide (CO) emissions from vehicle tailpipes, under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels (i.e., adversely affecting residents, school children, hospital patients, the elderly, etc.). The Basin is designated as in attainment for the federal and state CO standards. Further, three major control programs have contributed to the reduced per-vehicle CO emissions: exhaust standards, cleaner burning fuels, and motor vehicle inspection/maintenance programs. Nonetheless, according to the SMAQMD CEQA Guide, a potential CO impact may occur at any location where the background CO concentration and the project emissions already exceeds 9.0 parts per million (ppm), which is the 8-hour California ambient air quality standard. The closest monitoring station representative of meteorological conditions near the Project Site is the Sacramento-Bercut Drive Station, which is approximately 7.96 miles north of the Project Site. The highest CO concentration at the Sacramento-Bercut Drive Station was measured at 3.29 ppm in 2018. As such, the background CO concentration does not exceed 9.0 ppm and the Project's relatively small number of anticipated trips would have a negligible increase on local CO concentrations. Furthermore, the Basin has been in CO attainment since 1998. Therefore, CO emissions and hotspot impacts would be less than significant.

With respect to the Proposed Project's construction-related air quality emissions and cumulative Basin-wide conditions, the SMAQMD has developed strategies to reduce criteria pollutant emissions outlined in the 2015 Triennial Report and Plan Revision pursuant to federal CAA mandates. As such, the Proposed Project would comply with SMAQMD Rule 403 requirements and the adopted 2015 Triennial Report and Plan Revision emissions control measures. Rule 403 requires that fugitive dust be controlled with the best available control measures in order to reduce dust so that it does not remain visible in the atmosphere beyond the property line of the proposed project. Per SMAQMD rules and mandates, these same requirements (i.e., Rule 403 compliance and compliance with adopted 2015 Triennial Report and Plan Revision emissions control measures) would also be imposed on construction projects throughout the Basin, which would include related projects.

As discussed previously, the Proposed Project would not result in short- or long-term air quality impacts, as emissions would not exceed the SMAQMD adopted construction or operational thresholds. Additionally, adherence to SMAQMD rules and regulations would alleviate potential impacts related to cumulative conditions on a project-by-project basis. Emission reduction technology, strategies, and plans are constantly being developed. As a result, the Proposed Project would not contribute a cumulatively considerable net increase of any nonattainment criteria pollutant. Therefore, the Project's incremental operational impacts would be less than cumulatively considerable and impacts in this regard are less than significant.

#### SIP Consistency Determination

As stated above, the Project's criteria pollutant emissions during short-term construction and long-term operations would remain below the SMAQMD regional thresholds of significance for criteria pollutants. In the past, the USEPA has also required that an action's annual emissions are evaluated against 10 percent of the region's nonattainment or maintenance pollutants to determine if the action's emissions are regionally significant. On March 24, 2010, the USEPA removed this requirement from its General Conformity Rule. Since the Project-generated construction and operational emissions would not exceed the SMAQMD thresholds of significance, the de minimis levels established within 40 CFR Section 93.153 would also not be exceeded. Therefore, the Proposed Project conforms with the SIP.

The City of Sacramento is subject to the SMAQMD's 2015 Triennial Report and Plan Revision. Additionally, the Proposed Project is located within the Sacramento County subregion of the SACOG 2016 MTP/SCS, which governs population growth. The City's General Plan is consistent with the SACOG 2016 MTP/SCS, and since the

SACOG 2016 MTP/SCS is consistent with the 2015 Triennial Report and Plan Revision, growth under the General Plan is consistent with the 2015 Triennial Report and Plan Revision. As discussed in the Conformance with Plans section of this EA, below, no changes to the General Plan land use designation are proposed. Therefore, the Proposed Project is considered consistent with the General Plan, and is consistent with the types, intensity, and patterns of land use envisioned for the Site vicinity in the SACOG 2016 MTP/SCS Summary of Growth and Land Use Forecast. The population, housing, and employment forecasts, which are adopted by SACOG Regional Council, are based on the local plans and policies applicable to the City. Additionally, as the SMAQMD has incorporated these same projections into the 2015 Triennial Report and Plan Revision, the Proposed Project would be consistent with the projections. Therefore, no adverse effect would result from the Proposed Project, the Proposed Project would be consistent with HUD's guidance on air quality, and no formal compliance steps or mitigation are required.

#### **References:**

City of Sacramento, 2035 General Plan Land Use & Urban Form Diagram, https://www.cityofsacramento.org/-/media/Corporate/Files/CDD/Planning/General-Plan/2035-GP/2035-SacGPU\_LUD.pdf?la=en, accessed May 27, 2020.

City of Sacramento, 2035 General Plan, adopted March 3, 2015.

City of Sacramento, *Planning and Development Code*, https://www.cityofsacramento.org/-/media/Corporate/Files/CDD/Planning/Maps/Sacramento\_Zoning\_E

v10/Sacramento\_Zoning\_34X44.pdf?la=en, February 22, 2017.

Department of Conservation Division of Mines and Geology, *A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos Report*, August 2000, https://ww3.arb.ca.gov/toxics/asbestos/ofr\_2000-019.pdf.

Michael Baker International, Villa Jardin and Coral Gables Project – Air Quality Technical Memorandum, June 1, 2020.

Sacramento Area Council of Governments, 2016 Metropolitan Transportation Plan/Sustainable Communities Strategy, adopted February 18, 2016.

Sacramento Metropolitan Air Quality Management District, 2004 Revision to the California State Implementation Plan for Carbon Monoxide, July 22, 2004.

Sacramento Metropolitan Air Quality Management District, 2016 Annual Progress Report, March 23, 2017.

Sacramento Metropolitan Air Quality Management District, Guide to Air Quality Assessment in Sacramento County Chapter 2: Environmental Review, April 2020.

		Sacramento Metropolitan Air Quality Management District, CEQA Guide Chapter 8: Cumulative Air Quality Impacts, May 2020.
		Sacramento Metropolitan Air Quality Management District, PM2.5 Implementation/Maintenance and Redesignation Request for Sacramento PM2.5 Nonattainment Area, February 5, 2014.
		Sacramento Metropolitan Air Quality Management District, <i>PM</i> <sub>10</sub> <i>Implementation/Maintenance Plan and Redesignation Request for Sacramento County</i> , October 28, 2010.
		Sacramento Metropolitan Air Quality Management District, Sacramento Regional 2008 NAAQS 8-Hour Ozone Attainment and Reasonable Further Progress Plan, July 24, 2017.
		Sacramento Metropolitan Air Quality Management District, Triennial Report and Air Quality Plan Revision, May 28, 2015.
		U.S. Environmental Protection Agency, Carbon Monoxide Emissions, https://cfpub.epa.gov/roe/indicator_pdf.cfm?i=10, accessed May 27, 2020.
		U.S. Environmental Protection Agency, Revisions to the General Conformity Regulations, https://www.epa.gov/sites/production/files/2016-03/documents/20100324rule.pdf, March 24, 2010.
Coastal Zone Management  Coastal Zone Management	Yes No	The Proposed Project does not require state review under the Coastal Zone Management Act, as the City of Sacramento is not within the California Coastal Commission's jurisdiction. As such, no further analysis is required.
Act, sections 307(c) & (d)		References:
307(c) & (u)		California Coastal Commission, <i>Maps: Coastal Zone Boundary</i> , <a href="https://www.coastal.ca.gov/maps/czb/">https://www.coastal.ca.gov/maps/czb/</a> , accessed December 27, 2019.
Contamination and Toxic Substances  24 CFR Part 50.3(i) & 58.5(i)(2)	Yes No	The Project Site is characterized by the Villa Jardin apartment complex (which contains 11 two-story multifamily residential structures located on 1.45 acres of land), as well as an undeveloped lot (which contains three parcels totaling 0.87 acres). The Villa Jardin property currently contains 44 dwelling units, a leasing office, a surface parking lot, and decorative landscaping. The Project Site has been characterized by these uses since 1966. Prior to 1966, the Project Site was undeveloped.
		State and Federal Hazard Materials Database Results
		Locations in the Project vicinity known to contain toxic substances and contamination are identified using data from the California Department of Toxic Substances Control's (DTSC) EnviroStor database. The Project Site is not identified as a cleanup site. There are only four cleanup sites located within 1 mile of the Project Site,

all of which are school investigations. Three of these school investigations are closed, with no further action needed. The final school investigation site is located approximately 0.9 miles north of the Project Site and is designated as "inactive."

Further, the GeoTracker database, maintained by the California State Water Resources Control Board (SWRCB), identified two permitted underground storage tanks and no oil/gas sites, hazardous waste sites, or land disposal sites within 1 mile of the Project Site. These sites include the Florin Food and Gas site, located at 2460 Florin Road, and the Meadowview City Service Center, located at 2812 Meadowview Road. There are five leaking underground storage tank cleanup sites within 1 mile of the Project Site, with cleanup completed at all five sites. There are three cleanup programs within 1 mile of the Project Site. The cleanup of two of these sites has been completed. The remaining cleanup program site is the Meadowview Community Center, located at 2450 Meadowview Road, which is currently undergoing remediation. The 5-acre site was acquired by the City of Sacramento in 1993 for the purpose of building a community center. It was the former site of a retail complex with a gas station on the corner of Meadowview Road and 24th Street. Initial environmental investigations showed the presence of dry cleaner solvent (perchloroethylene or PCE) in the soil, as well as petroleum hydrocarbons (gasoline) from the gas station. The City installed soil vapor extraction and air sparging systems to clean up the PCE and the gasoline in the soil. The City also began extracting and treating groundwater for PCE in 2002. The site is under active remediation and is used as a community center, with the majority of the site covered by impervious surfaces or managed landscaping and turf. Further, there are shallow and deep monitoring wells located on Coral Gables Court and Meadowview Road, as well as located in the residential development west of the Project Site.

The USEPA identifies one brownfield site (through its Assessment, Cleanup and Redevelopment Exchange System) in the Project vicinity, which is located at 2380 Meadowview Road. This site contains petroleum-contaminated soils, which are capped by an existing concrete pad on the surface of the site. The USEPA closely monitors the emissions of these facilities to ensure annual limits are not exceeded.

There is no evidence of noncompliance, violations, or enforcement actions at these locations, which would indicate that these facilities represent a hazard affecting the health and safety of the occupants of the Proposed Project; however, groundwater flow direction and depth to groundwater could result in contamination at the Project Site, thus requiring further investigation. This investigation is described in the Environmental Site Assessment (ESA) section, below.

Environmental Site Assessments (ESAs) and Soil Vapor Sampling

As stated in the Phase I ESA, completed by Professional Service Industries, Inc. (PSI) in September 2019, no hazardous materials were observed during a visual inspection of the existing apartments and vacant lot other than liquid cement, popcorn/acoustic ceilings, ceiling texturing, paint, leak sealant, and cleaning products. However, several properties associated with the former retail complex located at 2450 Meadowview Road, approximately 550 to 650 feet southwest of the Project Site, were listed on local and state environmental databases as a site of subsurface contamination. The contamination at this site is described above. PSI determined that based on the presence of PCE in monitoring wells located 150 feet south of the Project Site, and based on groundwater flow direction, depth to groundwater, and impact to the subsurface, the PCE contamination (and resulting vapor encroachment conditions) originating from the former retail property at 2450 Meadowview Road could be present at the Project Site. As such, PSI prepared a Soil-Vapor Sampling and Analysis Report, dated January 2020, which details the findings of a soil vapor investigation of the Project Site.

This January 2020 report analyzes soil vapor samples taken from four locations within the vacant lot that makes up the northern portion of the Project Site in October 2019 (where ground disturbance is proposed through site preparation and construction of the Coral Gables component of the Project). Numerous VOCs associated with petroleum hydrocarbons, as well as PCEs and trichloroethene (TCEs), were detected in each of the soil vapor samples taken from this area. When comparing the concentrations of all detected VOCs to DTSC's ambient air screening levels, none of the soil vapor samples had concentrations greater than screening levels other than one sampling location (Sampling Location 3), which found levels of chloroform, PCE, and TCE higher than DTSC's screening level. Further, benzene (a constituent of gasoline) was detected above its screening level in two of the soil vapor samples (Sampling Locations 1 and 3). The average of the benzene found in the four soil samples taken at the Project Site was 4.0 micrograms per cubic meter (ug/m3), which is above the DTSC screening level for residential uses (3.2 ug/m3).

PSI conducted further soil vapor testing at the Project Site in March 2020, collecting eight additional soil samples from beneath the proposed Coral Gables buildings. The locations of the sampling locations are available as Figure 2 of the April 16, 2020, PSI report (Soil Vapor Sampling). The soil vapor results for samples collected in March 2020 indicate that numerous VOCs, including the chlorocarbons TCE, bromodichloromethane, chloroform, and PCE, were detected in the soil vapor samples. Additionally, many VOCs associated with petroleum hydrocarbon-gasoline impact were

detected. A summary of the analytical results from the October 2019 and March 2020 soil vapor investigations is presented in **Table CON-1**, below. For Sampling Location 1 through Sampling Location 7, located in proposed residential development areas, PSI compared the soil vapor sample concentrations of all detected VOCs to the soil vapor residential DTSC screening levels, or USEPA regional screening levels, if no DTSC screening level was presented. Since Sampling Location 8 is to be a community building, PSI compared the Sampling Location 8 results to the commercial DTSC screening level, or USEPA regional screening level, if no DTSC screening level was presented.

As shown in Table CON-1, soil vapor concentrations were found the DTSC screening levels for 1.3 butadiene. bromodichloromethane, benzene, chloroform, PCE, and TCE for residential and commercial uses. Benzene and 1.3 butadiene are constituents of gasoline with their presence possibly being associated with a small spill of gasoline from a motor vehicle or from some impacted fill that was used at the subject property. Chloroform and bromodichloromethane are found as byproducts of chlorination of water. Their presence is possibly associated with a leak of drinking water from adjacent properties that has migrated vertically to groundwater and then migrated horizontally beneath the subject property, and then off gassing into the soil vapor. PCE and TCE appear to be present as a result of the off-site release to the south leading to off-gassing from impacted groundwater into the soil vapor beneath the Site.

Based on these results, the PSI analysis determined that a potential vapor intrusion condition is present at the subject property. As a result, the Project includes soil vapor barriers placed beneath each of the proposed buildings in the Coral Gables development, in order to address potential health concerns associated with soil vapor intrusion for both 1,3 butadiene and benzene, as well as the chlorinated hydrocarbons detected above the DTSC screening levels for future residential development. The Project includes a triple-layer nitrile composite barrier system. The base layer and top layer are composed of a high-density polyethylene (HDPE) material bonded to a geotextile. HDPE is known for chemical resistance, high tensile strength, excellent stress-crack resistance, and highly reliable surface containment. The core layer of the Nitra-Seal system is composed of a unique nitrile-modified asphaltic membrane. Nitrile is more chemically resistant than styrene-butadiene or rubber and would provide additional protection against vapor transmission. The soil vapor barrier included in the Project is designed for redevelopment projects in locations such as gas stations, dry cleaners, and other manufacturing sites with VOC contamination and thus would be appropriate for the Project Site. Because soil vapor samples collected at the proposed Coral Gables Project Site in October 2019 were

below DTSC's screening levels for existing residential buildings, additional testing of the Villa Jardin property was not necessary.

With the inclusion of the above described soil vapor barrier in the Project, the health and safety of Project occupants would not be affected by the existing contamination, nor would the contamination conflict with the intended residential use of the Site.

Lead-Based Paint and Asbestos-Containing Materials

PSI performed an asbestos and lead-based paint survey of the existing Villa Jardin apartments, which would be rehabilitated as part of the Proposed Project. This analysis is included in the Limited Hazardous Materials Survey for Villa Jardin Apartments assessment, dated October 8, 2019, and is summarized below.

Asbestos-containing materials (ACM) are highly regulated by local, state, and federal agencies, such as the SMAQMD, the California Occupational Safety and Health Agency (Cal-OSHA) and the USEPA. A material is considered by USEPA to be asbestos containing if at least one sample collected from an area shows asbestos present in an amount greater than 1 percent. In California, Cal-OSHA considers a material to be asbestos-containing construction material if at least one sample collected from an area shows asbestos present in an amount greater than one-tenth of 1 percent. Specific removal requirements apply if ACM would be disturbed during maintenance, renovation, or demolition activities.

A total of 68 samples of suspected ACM were collected during the survey of the Villa Jardin apartments, conducted on September 30, 2019. The survey identified ACM in many of the units, limited to drywall joint compound, wall texturing, and acoustical "popcorn" ceilings. While these materials may be disturbed during the proposed rehabilitation of Villa Jardin Apartments, construction contractors would be required to comply with local, state, and federal laws regulating the removal, handling, and disposal of ACM, including 40 CFR Part 61 (the National Emissions Standards for Hazardous Air Pollutants), Cal-OSHA Rule 1529, and SMAOMD Rule 902. Further, these regulations have permit and noticing requirements, including SMAQMD's requirement of written notification at least 10 days prior to work on friable or non-friable ACM, and Cal-OSHA's requirement of notification at least 24 hours prior to work on ACM. Further, ACM abatement contractors must maintain current licenses for the removal, transporting, or disposal of ACM and must obtain all building and special permits required for the asbestos removal work. Compliance with these mandatory regulations would ensure that occupants would not be exposed to contamination and impacts would be less than significant.

Regarding lead-based paint hazards, Cal-OSHA and the federal Occupational Safety and Health Administration do not define the amount of lead in paint which would require a regulatory treatment; however, HUD guidelines state that lead content in paint which exceeds 0.5 percent by weight requires corrective action. Federal and state standards use the term "trigger task" activities, which involve compliance regulations based on the level of paint disturbance, rather than the level of lead in the paint. Regardless, lead-based paint samples collected at the Villa Jardin Apartments (including samples taken from the walls and ceilings of multiple units) did not find lead concentrations higher than HUD's standard. Specifically, paint samples collected at the Project Site had lead concentrations less than 0.008 percent by weight, far below HUD action level of 0.5 percent. While the inspection found the paint to be in overall good condition, there is a possibility that other surfaces may contain lead-based paint. As such, contractors performing the proposed rehabilitation activities at Villa Jardin Apartments would be required to comply with state and federal regulations, such as 24 CFR Part 35, Cal-OSHA rule 1532.1, and 40 CFR Part 745 regarding evaluation, testing, and reducing lead-based paint hazards. Compliance with these required regulations would reduce lead-based paint hazards to an insignificant level.

#### References:

California Department of Toxic Substances Control, EnviroStor Map, generated January 6, 2020.

California State Water Resources Control Board, Geotracker Maps (LUST and Clean Up Program; Permitted USTs), generated January 6, 2020.

City of Sacramento, Monitoring Well Location Map, Meadowview Community Center, June 2008.

Professional Service Industries, Inc., Phase I Environmental Site Assessment: Villa Jardin Apartment and Undeveloped Land, September 26, 2019.

PSI, Soil-Vapor Sampling and Analyses Report; Undeveloped Land [Coral Gables Property], November 4, 2019.

PSI, Limited Hazardous Materials Survey: Villa Jardin Apartments, October 8, 2019.

U.S. Environmental Protection Agency, ACRES Brownfield Property Progress Profile, report generated January 6, 2020.

U.S. Environmental Protection Agency, NEPA Assist Map of RCRA sites near Project Site, map generated January 6, 2020.

**Summary of Soil Vapor Testing Analysis** 

Sampling Location	Date	Benzene (ug/m³)	Chloroform (ug/m³)	Tetrachloroethene (ug/m³)	Trichloroethene (ug/m³)	1,3 Butadiene (ug/m³)	Bromodichloromethane (ug/m³)
1	23-Oct-19	8.5	<5.0	<6.9	<5.5	<4.5	<6.8
2	23-Oct-19	<160	<250	<180	<270	<110	<340
3	23-Oct-19	7.5	14	35	42	<4.5	<6.8
5	23-Oct-19	<3.3	<5.0	<6.9	<5.5	<4.5	<6.8
1	26-Mar-20	<3.3	<5.0	210	<5.5	<4.5	<6.8
2	26-Mar-20	<3.3	<5.0	14	16	<4.5	<6.8
3	26-Mar-20	3.6	380	89	<5.5	<4.5	76
4	26-Mar-20	<3.3	7.8	8.5	<5.5	<4.5	<6.8
5	26-Mar-20	<3.3	5.7	51	<5.5	<4.5	<6.8
6	26-Mar-20	5.1	360	25	21	<4.5	35
7	26-Mar-20	4.9	160	41	<5.5	<4.5	8.3
8	26-Mar-20	11	140	<6.9	<5.5	8.6	8.1
	DTSC Soil Vapor Screening Levels (Residential and Commercial)						
Resid	lential	3.2	4	15	16	0.57	2.5
Comr	nercial	14	17.7	67	100	2.4	11
Source: PSI,	Source: PSI, Soil-Vapor Sampling and Analyses Report, Undeveloped Land (Coral Gables), Sacramento, California, Table 1, April 16, 2020.						

Endangered	Vac Ma	According to IIID Cuidones on Environmental According
Species  Endangered Species Act of 1973, particularly section 7; 50	Yes No	"consider potential impacts of the HUD-assisted project to endangered and threatened species and critical habitats." Further, the review must "evaluate potential impacts not only to any listed but also to any proposed endangered or threatened species and critical habitats."  HUD states that "A No Effect determination can be made if the
CFR Part 402		Project has no potential to have any effect on any listed species or designated critical habitats." This finding is appropriate if the Project has no potential to affect any species or habitats or if there are no federally listed species or designated critical habitats in the action area.
		The U.S. Fish and Wildlife identifies the giant garter snake (threatened) ( <i>Thamnophis gigas</i> ), California red-legged frog (threatened) ( <i>Rana draytonii</i> ), California tiger salamander (threatened) ( <i>Ambystoma californiense</i> ), Delta smelt (threatened) ( <i>Hypomesus transpacificus</i> ), valley elderberry longhorn beetle (threatened) ( <i>Desmocerus californicus dimporhpus</i> ), vernal pool fairy shrimp (threatened) ( <i>Branchinecta lynchi</i> ), and vernal pool tadpole shrimp (endangered) ( <i>Lepidurus packardi</i> ) as endangered or threatened species that could be found in the vicinity of the Project Site (see included Information for Planning and Consultation (IPaC) report, generated December 2019).
		The giant garter snake is a threatened species that inhabits agricultural wetlands and other waterways. Further, amphibians, fish, and crustaceans all require sources of water (at least seasonally in the case of crustaceans) for their habitat. The valley elderberry longhorn beetle also requires elderberry plants along rivers or streams for its habitat. Due to the Project Site's lack of standing, seasonal, or running water, the Project Site would not be a viable habitat for any of these threatened or endangered species.
		Additionally, the IPaC report did not find any critical habitat within the Project Site. Project-related grading and construction activities would take place on a site that has been previously disturbed by past construction or is completely surrounded by existing residential and other suburban land uses. Because the Project Site is located within a fully developed environment that is surrounded by disturbed areas (such as a sidewalk, residential homes, roadways, and institutional land uses), implementation of the Proposed Project would not result in loss of habitat utilized by any of the endangered or threatened species identified above. However, the Project Site does contain several mature trees, varying in size, species, and condition, which may provide shelter for migratory birds protected under the Migratory
		Birds Treaty Act. Discussion of the Proposed Project's impact on migratory birds and related habitat is provided in the Natural Features Section, below.

		Therefore, the Project would have no effect on endangered or threatened species or critical habitat.
		References:
		U.S. Fish and Wildlife Service, <i>Information for Planning and Conservation (IPAC) Report</i> , generated December 2019.
		U.S. Fish and Wildlife Service, Sacramento Fish and Wildlife Office, Species Information, Giant Garter Snake, <a href="https://www.fws.gov/sacramento/es-species/Accounts/Amphibians-Reptiles/giant_garter_snake/">https://www.fws.gov/sacramento/es-species/Accounts/Amphibians-Reptiles/giant_garter_snake/</a> , accessed December 27, 2019.
		U.S. Fish and Wildlife Service, Sacramento Fish and Wildlife Office, Species Information, Valley Elderberry Longhorn Beetle, <a href="https://www.fws.gov/sacramento/es_species/Accounts/Invertebrates/valley_elderberry_longhorn_beetle/">https://www.fws.gov/sacramento/es_species/Accounts/Invertebrates/valley_elderberry_longhorn_beetle/</a> , accessed December 27, 2019.
Explosive and Flammable Hazards  24 CFR Part 51 Subpart C	Yes No	The Project Site is currently characterized by an existing 44-unit apartment complex (comprising 11 two-story buildings referred to as Villa Jardin) and vacant land consisting of three parcels that total approximately 0.87 acres in size. The Project would include development, construction, and rehabilitation that will increase residential densities; therefore, HUD requires an analysis of current or planned stationary aboveground storage containers within 1 mile of the Project Site.
		The USEPA identifies three locations within 1 mile that are in the RCRA (USEPA's Resource Conservation and Recovery Act) system, which is an inventory of all generators, transporters, treaters, storers, and disposers of hazardous materials and waste. These locations include the California Highway Patrol site located at 2812 Meadowview Drive, which is listed as a small quantity hazardous waste/material generator; the California Department of Food and Agriculture Center for Analytical Chemistry located at 3292 Meadowview Road, which is classified as a hazardous waste/material transporter; and the Army National Guard facility located at 3250 Meadowview Road, which is classified as a hazardous waste/material transporter. Upon review of aerial photography of the facilities identified above, aboveground storage tanks of more than 100-gallon capacity do not appear on these sites. Further, the California Highway Patrol, California Department of Food and Agriculture, and U.S. Army National Guard are minor users and storers of hazardous wastes and materials and, therefore, would not represent a significant threat to Project occupants.  Additionally, per the National Pipeline Mapping System maintained by the U.S. Department of Transportation, the nearest gas transmission pipeline is located approximately 3,000 feet east of the Project Site, within the railroad right of way. There are no hazardous liquid pipelines, liquid spill accidents, or gas release incidence within the Project vicinity. In short, the Project Site and the

		immediate surrounding area are free of hazardous materials, contamination, toxic chemicals, gases, and radioactive substances that could affect health or safety, or conflict with the intended use of the Project Site.  References: Google Earth, Map data 2020. U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration, National Pipeline Mapping System, Map generated June 10, 2020. U.S. Environmental Protection Agency, NEPA Assist Map of RCRA sites near Project Site, map generated January 6, 2020.
Farmlands Protection  Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes No	Federal projects are subject to Farmland Protection Policy Act requirements if they may irreversibly convert farmland to a nonagricultural use. The Proposed Project would involve the rehabilitation of existing affordable housing and the construction of new affordable housing and an associated community building. The Project Site has been classified by the California Department of Conservation as Urban and Built-Up Land. Land classified by the State of California as farmland of local importance is located 1,650 feet east of the Project Site. However, this land has been cleared and has not been used for agricultural purposes for more than a decade. Aerial imagery shows this land as barren and subdivided by Elwood Avenue and Wainscott Way since 2007. The land is currently for sale. Therefore, because the Project Site would not result in physical impacts beyond the boundaries of the Project Site, the Proposed Project would not convert prime farmland or farmland of local importance to another use.  References:  California Department of Conservation, California Important Farmland Finder, map generated on December 27, 2019.  Google Earth, Map data 2007.  HUD, HUD Exchange: Farmland Protection, https://www.hudexchange.info/programs/environmental-review/farmlands-protection/, accessed June 10, 2020.
Floodplain Management	Yes No	The Proposed Project would involve the rehabilitation of existing affordable housing and the construction of new affordable housing and an associated community building in the City of Sacramento.
Executive Order 11988, particularly		Per HUD guidance, the Project is not exempt from compliance with HUD Floodplain Management regulations in Part 55 (through 24 CFR 55.12(c)). The Project is outside of the 100-year floodplain but

section 2(a); 24 CFR Part 55		within a 500-year floodplain; however, the Project Site is located in an area with reduced flood risk due to levees located south and east of the Project Site. Under 24 CFR 55.20, projects that occur in a 500-year floodplain shall comply with HUD's 8-step process if the project is deemed a critical action as defined in 24 CFR 55.2(b)(3). Critical actions are those activities for which even a slight chance of flooding would be too great, because flooding may result in loss of life, injury, or damage to property. A Project would be considered a "critical action" if it would create, maintain, or extend the useful life of structures or facilities that produce, use, or store hazardous materials; provide essential and irreplaceable records or emergency services; or would likely contain occupants with limited mobility (i.e., hospitals, nursing homes, or retirement service facilities). As the Project is not considered a "critical action" under this definition, and because the levees south and east of the Project Site reduce flood risks in the area, no further analysis is required, and the Project is in compliance with this section.
		References:
		FEMA, Flood Insurance Rate Map (FIRM) 06067C0305H.
		HUD, HUD Exchange: Floodplain Management, <a href="https://www.hudexchange.info/environmental-review/floodplain-management/">https://www.hudexchange.info/environmental-review/floodplain-management/</a> , accessed May 26, 2020.
Historic Preservation  National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes No	As stated above, the Proposed Project would consist of two components: the construction of 38 affordable housing units and a community center building (Coral Gables Project); and the renovation of the existing 44-unit Villa Jardin apartment complex (Villa Jardin Project). To determine whether the Project would result in adverse effects to historic properties in accordance with Section 106 of the National Historic Preservation Act, Michael Baker International completed a cultural resources identification and evaluation report, dated January 21, 2020, which is summarized below.  **Background Research**
		The cultural resources identification and evaluation report completed by Michael Baker details the North Central Information Center (NCIC) records search, archival research, literature review, historical map review, historical society consultation, Native American Heritage Commission Sacred Lands File search, field surveys, and evaluation of Villa Jardin Apartments' eligibility to the National Register of Historical Resources (National Register) and California Register of Historical Resources (California Register). The NCIC, as part of the California Historical Resources Information System, California State University, Sacramento, an affiliate of the California Office of Historic Preservation, is the official state repository of cultural resources records and reports for Sacramento County. As part

of the records search, the following federal and California inventories were reviewed:

- California Inventory of Historic Resources (OHP 1976).
- California Points of Historical Interest (OHP 1992 and updates).
- California Historical Landmarks (OHP 1996).
- Archaeological Determinations of Eligibility (ADOE) (OHP 2012a).
- Directory of Properties in the Historic Property Data File (HPDF) (OHP 2012b). The directory includes the listings of the National Register, National Historic Landmarks, California Register, California Historical Landmarks, and California Points of Historical Interest.

One cultural resource was identified within the APE and one cultural resource was identified within the quarter-mile search radius of the APE as described below. These include the Sacramento River Tribal Cultural Landscape (a roughly 55-mile-long corridor of the lower Sacramento River and its immediate riparian surroundings, from its confluence with the Mokelumne River to its confluence with the Feather River, which has cultural meaning to local tribes) and the Franklin Family Cemetery Site (a historic period cemetery located approximately 950 feet from the APE). No cultural resources studies have been previously completed within the APE or within the quarter-mile search radius.

A review of historic maps shows the Project Site as undeveloped from 1855 to 1953. In 1885 it was noted as part of a 200-acre ranch. By 1947 it was depicted as part of a farm associated with a farmhouse located approximately a quarter-mile northwest of the APE. The current apartment complex was constructed in 1964.

A search of the City of Sacramento online building permit database revealed that 10 of the 11 buildings were constructed in 1964, and the 11th building in 1966. Records also indicate minor maintenance work on the property, such as HVAC, sewer service line, furnace, carbon monoxide and smoke alarm, and water-conserving appliances replacement.

On January 14, 2020, Michael Baker International staff conducted an archaeological and architectural survey of the Project Site. The archaeological survey was completed using 10-meter transect lines. The surface area was 75 percent vegetated with moderate visibility. One hundred percent of the Project Site was surveyed. Observed soils consisted of gravel clay loam, dark in color with patches of yellow discoloring. Modern garbage debris littered the surface. The landscaped areas around the Villa Jardin apartment buildings were inspected. No archaeological materials were identified within the APE.

## Tribal Consultation

On December 3, 2019, Michael Baker International sent a letter describing the project to the Native American Heritage Commission

(NAHC) in Sacramento asking the commission to review its Sacred Lands File for any Native American cultural resources that might be affected by the project. Also requested were the names of Native Americans who might have information or concerns about the APE. The NAHC provided the names of five federally recognized tribes as having interest in Sacramento County. Consultation invitations were sent to these five tribes on December 16, 2019. Two tribes did not respond to the request for consultation (the United Auburn Indian Community of the Auburn Rancheria and the Ione Band of Miwok Indians). One tribe responded via email that they had no concerns with the Project and closed consultation (the Wilton Rancheria Nation). Two tribes responded, indicating they had no concerns with the Project, but requested notification if new cultural resources or human remains are identified during the course of the Project (the Buena Vista Rancheria of Me-Wuk Indians and the Shingle Springs Band of Miwok Indians).

National Register and California Register Evaluations

A resource would be considered National or California Register eligible if it:

- A. is associated with events that have made a significant contribution to the broad patterns of our history; or
- B. is associated with the lives of significant persons in or past; or
- C. contains distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. yields or may be likely to yield, information important in history or prehistory.

The Villa Jardin Apartment complex appears ineligible for listing in the National Register under Criteria A, B, C, and D. Further, it appears ineligible for listing in the California Register under Criteria 1, 2, 3, and 4 (which mirror the National Register Criteria A-D) because it lacks association with a historic context. Specifically, the apartment buildings are not eligible for listing under Criterion A/1 because research failed to suggest that the apartment complex played an important role in suburbanization, or in community planning or development, as it was not mentioned in any form of literature. Apartment buildings are not eligible for listing under Criterion B/2 because research failed to identify information regarding significant individuals associated with the property given the high turnover an apartment complex typically experiences. Apartment buildings are not eligible for listing under Criterion C/3 because the Ranch-style apartment complex is a minor example of the style commonly seen throughout the region. It was constructed by George Reed, a prolific area building contractor known for low-cost multifamily and singlefamily residential construction throughout Northern California. He, however, does not appear to rise to the level of master builder, which is defined as a person of generally recognized greatness in the field and a known craftsman of consummate skill. He is neither widely recognized nor were his low-cost residential projects known for excellent craftsmanship. Finally, the apartment buildings are not eligible for listing under Criterion D/4, because the property is not and never was the principal source of important information pertaining to subjects such as mid-twentieth century apartment complexes.

#### SHPO Consultation

Based on the above information, the SHRA sent a letter (dated March 6, 2020) to the California Office of Historic Preservation, State Historic Preservation Officer (SHPO) stating that based on the findings of the cultural resources study, the SHRA has determined that a finding of "No Historic Properties Affected" is appropriate for the undertaking. The SHPO responded in a letter dated April 13, 2020, stating that the California Office of Historic Preservation does not object to the SHRA finding of No Historic Properties Affected by the Proposed Project (the undertaking).

# Summary

In short, the NCIC records search, literature review, archival research, historical society consultation, Native American consultation, field survey, and National Register and California Register evaluations identified no historic properties or historical resources within the APE. Standard late discovery mitigation measures will be implemented by the Project in the event archaeological resources are identified during Project-related ground-disturbing activities. With these mitigation measures in place, the Project would not result in an adverse effect on historic resources. As such, the Project is in compliance with Section 106 of the National Historic Preservation Act and no further analysis is required.

#### **Mitigation Measures:**

# CUL-1: Treatment of previously unidentified archaeological deposits.

If suspected prehistoric or historical archaeological deposits are discovered during construction, all work within 25 feet of the discovery shall be redirected and a Secretary of the Interior Professionally Qualified archaeologist and/or Registered Professional Archaeologist shall assess the situation and make recommendations regarding the treatment of the discovery. Impacts to significant archaeological deposits should be avoided if feasible, but if such impacts cannot be avoided, the deposits shall be evaluated for their eligibility for the California Register of Historical Resources. If the deposits are not California Register eligible, no further protection of the find is necessary. If the deposits are California Register eligible, impacts shall be avoided or mitigated. Acceptable mitigation may consist of but is not necessarily limited to systematic recovery and analysis of archaeological deposits, recording the resource,

			preparation of a report of findings, and accessioning recovered archaeological materials at an appropriate curation facility.
			CUL-2: Treatment of previously unidentified human remains.
			Any human remains encountered during project ground-disturbing activities shall be treated in accordance with California Health and Safety Code Section 7050.5. There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the County coroner has determined the manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation or to his or her authorized representative. Project personnel/construction workers shall not collect or move any human remains and associated materials. If the human remains are of Native American origin, the coroner must notify the Native American Heritage Commission (NAHC) within 24 hours of this identification. The NAHC will immediately identify a Native American most likely descendant to inspect the site and provide recommendations within 48 hours for the proper treatment of the remains and associated grave goods.
			References:
			Green, Stephanie, Environmental Coordinator, Sacramento Housing and Redevelopment Agency, letter to Shannon Lauchner, Office of Historic Preservation, March 6, 2020.
			Michael Baker International, Cultural Resources Identification and Evaluation Memo Report for the Villa Jardin and Coral Gables Project, City of Sacramento, Sacramento County, California, January 21, 2020.
			Polanco, Julianne, State Historic Preservation Officer, Letter to Stephanie Green, SHRA, April 13, 2020.
Noise Abatement and Control  Noise Control Act of 1972, as amended by the Quiet Communities	Yes	No	The analysis in the following paragraphs is a summary of the Noise Technical Memorandum prepared for the Proposed Project (the Noise Technical Memorandum, Villa Jardin and Coral Gables Project prepared by Michael Baker International in 2020). As rehabilitation activities proposed at the Villa Jardin Apartments would not result in substantial or prolonged noise impacts, the following analysis focuses on Site preparation and construction of the Coral Gables component of the Project.
Act of 1978; 24 CFR Part 51 Subpart B			The Project Site is located within 1,000 feet of a major roadway and within 3,000 feet of a railroad. Specifically, the existing Villa Jardin apartments are located approximately 65 feet from Meadowview Road and approximately 2,900 feet west of existing railroad tracks (the Sacramento Regional Transit, Blue Line). HUD guidance states that if a Project Site is within these distances, environmental analysis

must demonstrate that the noise level is currently acceptable (at or below 65 DNL (day/night noise level)). If noise levels are above acceptable levels, the environmental documentation must demonstrate that there is an effective noise barrier that would bring interior noise levels to 45 DNL and/or exterior noise levels to 65 DNL. This analysis first provides an overview of the Project's noise impacts, as well as an analysis of ambient noise levels in the Project area.

The City of Sacramento's General Plan Noise Element and the Sacramento City Code (SCC) contain the City's policies on noise. The SCC and the Noise Element establish guidelines for controlling construction and operational noise in the City. For operational noise standards, the City identifies noise-sensitive land uses and noise sources with the intent of separating these uses.

#### Construction (Short-term) Noise Impacts

Temporary increases in ambient noise levels as a result of the Project would predominantly be associated with construction activities. Construction activities would occur over approximately 14 months and would include the following phases: grading, building construction, and architectural coating. Typical noise levels generated by construction equipment are shown in **Table NOI-1**. It should be noted that the noise levels identified in **Table NOI-1** are maximum sound levels ( $L_{max}$ ), which is the highest individual sound occurring at an individual time period. Operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be due to random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts).

Table NOI-1

Maximum Noise Levels Generated by Construction Equipment

Type of Equipment	Acoustical Use Factor <sup>1</sup>	L <sub>max</sub> at 50 Feet (dBA)
Concrete Saw	20	90
Crane	16	81
Concrete Mixer Truck	40	79
Backhoe	40	78
Dozer	40	82
Excavator	40	81
Forklift	40	78
Paver	50	77
Roller	20	80
Tractor	40	84
Water Truck	40	80
Grader	40	85

General Industrial Equipment	50	85		
Note:  1. Acoustical Use Factor (percent): Estimates the fraction of time each piece of construction equipment is operating at full power (i.e., its loudest condition) during a construction operation.				

Source: Federal Highway Administration, Roadway Construction Noise Model (FHWA-HEP-05-054), January 2006.

Sensitive receptors surrounding the Project Site include residences in all directions of the Project Site. These sensitive receptors may be exposed to elevated noise levels during Project construction. However, the Project would adhere to the City's Noise Ordinance, which governs hours of construction, noise levels generated by construction and mechanical equipment, and the allowed level of ambient noise (SCC 8.68.080[D]). In accordance with these regulations, construction noise would be limited to normal working hours (7:00 a.m. to 6:00 p.m. Monday through Saturday, and 9:00 a.m. to 6:00 p.m. on Sunday). Construction would occur across the entire project Site and would not be localized to off-site sensitive receptors. The City's Noise Ordinance does not have specific construction noise limits. In addition, all construction activities would comply with SCC 8.68.080(D). Therefore, noise impacts from shortterm construction activities would be less than significant following compliance with the City's allowable construction hours.

Operational (long-term) Noise Impacts

#### Off-Site Mobile Noise

Future development of the Proposed Project would result in some additional traffic on adjacent roadways, thereby potentially increasing vehicular noise in the vicinity of existing and proposed land uses. This increase in vehicular traffic would be generated by the Coral Gables component of the Project. Because the Villa Jardin apartments are currently occupied, rehabilitation activities that are part of the Proposed Project would not increase capacity of the apartments and, thus, would not increase vehicular noise above current conditions. The most prominent source of mobile traffic noise in the Project vicinity is along Meadowview Road and 24th Street. Based on the City's General Plan Mobility Element and RD-77-108 modeling, Meadowview Road and 24th Street experience noise levels that range between 59.8 to 63.8 dBA CNEL at 100 feet from the roadway centerlines.

The Project's average daily trips were calculated using California Emission Estimator Model version 2016.3.2 (CalEEMod) trip length and generation values based off the 38 multifamily dwelling units proposed for the Coral Gables development. Based off the CalEEMod results, the Project would generate a peak of 272 average daily trips (ADTs). The current average daily trips on roadways surrounding the Project Site range between 13,800 and 25,300. As a worst-case scenario, assuming all Project-generated daily trips occurring on the roadway with lowest average daily trips of 13,800, the Proposed Project would increase the daily trips in the Project vicinity by 2

percent. The daily trips from the Proposed Project would represent a nominal percent increase in daily traffic compared to existing traffic conditions on the surrounding roadways. According to the California Department of Transportation (Caltrans), a doubling of traffic (100 percent increase) on a roadway would result in a perceptible increase in traffic noise levels (3 dBA). As such, the Project-related increase in traffic volume along surrounding roadways would be nominal compared to existing traffic, as the Project would increase daily trips by 2 percent and would not result in a perceptible increase traffic noise level (less than 100 percent). Thus, a less than significant impact would occur in this regard.

#### Stationary Noise

As stated above, the Project proposes development of 38 affordable housing units, a community center building, and an open space area with play areas. Stationary noise sources associated with the Project would include the operation of mechanical equipment, parking lot activities, and outdoor patio area activities.

#### Mechanical Equipment Noise

Heating, ventilation and air conditioning (HVAC) units would be installed at the proposed Coral Gables buildings. Typically, mechanical equipment noise is 55 dBA at 50 feet from the source. The nearest sensitive receptor/use to the Project Site is the multifamily residence located approximately 40 feet west of where the HVAC units could potentially be located.

Noise has a decay rate due to distance attenuation, which is calculated based on the inverse square law of sound propagation. Based upon this law, sound levels decrease by 6 dBA for each doubling of distance from the source. As a result, HVAC unit noise would be 57 dBA at the nearest sensitive receptor and would not exceed the City's 65 dBA CNEL normally acceptable exterior noise compatibility standard for multifamily residential uses. Thus, the Proposed Project would not result in noise impacts to nearby sensitive receptors from HVAC units, and stationary noise levels from the proposed HVAC units would comply with the City's noise compatibility standard and Noise Ordinance. Impacts in this regard would be less than significant.

#### Parking Lot Noise

The Proposed Project would include 38 surface parking spaces. Estimates of the maximum noise levels associated with the parking lot activities attributed to the Project are presented in **Table NOI-2**.

Table NOI-2

Maximum Noise Levels Generated By Parking Lots

Noise Source	Maximum Noise Levels at 50 Feet from Source
Car door slamming	61 dBA L <sub>eq</sub>
Car starting	60 dBA L <sub>eq</sub>

Car idling	53 dBA L <sub>eq</sub>
Source: Kariel, H. G., Noise	in Rural Recreational Environments,
Canadian Acoustics 19(5), 3-10,	1991.

As shown in **Table NOI-2**, parking lot activities can result in noise levels up to 61 dBA at a distance of 50 feet. It is noted that parking lot noises are instantaneous noise levels compared to noise standards in the CNEL scale, which are averaged over time. As a result, noise levels over time resulting from parking lot activities would be far lower than what is identified in **Table NOI-2**, which is lower than the existing ambient noise levels (between 59.8 and 63.8 dBA Ldn) in the Project vicinity and would not exceed the City's 65 dBA CNEL normally acceptable exterior noise compatibility standard for multifamily residential uses. Furthermore, an 8-foot wall would be in between the surface parking lot and the nearest sensitive receptor to the east. This 8-foot wall would break the line of sight between the surface parking lot and the sensitive receptor and would attenuate the noise levels by approximately 8 dBA. Therefore, parking lot noise associated with the Project would range between 45 to 53 dBA at 50 feet and would not exceed the City's noise standards. Impacts would be less than significant in this regard.

#### Outdoor Gathering Area Noise

The Project would include a community center and open space area. This area has the potential to be accessed by groups of people intermittently. Noise generated by groups of people (i.e., crowds) is dependent on several factors including vocal effort, impulsiveness, and the random orientation of the crowd members. Crowd noise is estimated at 60 dBA at 1 meter (3.28 feet) away for raised normal speaking. This noise level would have a +5 dBA adjustment for the impulsiveness of the noise source, and a -3 dBA adjustment for the random orientation of the crowd members. This would result in crowd noise being approximately 62 dBA at 1 meter from the source (i.e., the outdoor area). Therefore, noise levels at the property boundary would be less than the City's 65 dBA CNEL normally acceptable exterior noise compatibility standard for multifamily residential uses.

#### Groundborne Vibration and Groundborne Noise Levels

Project construction can generate varying degrees of groundborne vibration, depending on the construction procedure and the construction equipment used. Operation of some heavy-duty construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of the construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Groundborne vibrations from

construction activities rarely reach levels that cause structural damage.

The Federal Transit Administration (FTA) has published standard vibration velocities for construction equipment operations. In general, the FTA architectural damage criterion for continuous vibrations (i.e., 0.20 inch/second) appears to be conservative. The types of construction vibration impacts include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural. Typical vibration produced by commonly used construction equipment is listed in **Table NOI-3**, below.

Table NOI-3
Typical Vibration Levels for Construction Equipment

Equipment	Approximate peak particle velocity at 25 feet (inches/second) <sup>1</sup>	Approximate peak particle velocity at 20 feet (inches/second) <sup>1</sup>
Large bulldozer	0.089	0.1244
Loaded trucks	0.076	0.1062
Small bulldozer	0.003	0.0042
Jackhammer	0.035	0.0489

#### Notes:

1. Calculated using the following formula:

PPV  $_{equip}$  = PPV $_{ref}$  x  $(25/D)^{1.5}$ 

where: PPV (equip) = the peak particle velocity in in/sec of the equipment adjusted for the distance

PPV (ref) = the reference vibration level in in/sec from Table 7-4 of the FTA *Transit Noise and Vibration Impact Assessment Manual.* 

D = the distance from the equipment to the receiver

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018. Table 7-4 *Vibration Source Levels for Construction Equipment*.

Groundborne vibration decreases rapidly with distance. As indicated in **Table NOI-3**, based on the FTA data, vibration velocities from typical heavy construction equipment operations that would be used during Project construction (Coral Gables) range from 0.004 to 0.1244 inch/second PPV at 20 feet from the source of activity. The nearest structures to the Coral Gables construction site are the Villa Jardin apartment (residential) buildings located approximately 15 feet to the south; however, the Project would not utilize heavy-duty construction equipment with noticeable vibration levels (e.g., vibratory rollers, jackhammers, pile drivers) near off-site uses or nearby structures. Therefore, construction activities would not be capable of exceeding the 0.2 inch/second PPV significance threshold for vibration and a less than significant impact would occur in this regard.

Ambient Noise Analysis and Compliance with 24 CFR Part 51 Subpart B

Short-term construction noise is temporary and of a short duration, resulting in periodic increases in the ambient noise environment. As discussed above, construction of the Project would comply with allowable construction hours between 7:00 a.m. to 6:00 p.m. Monday through Saturday, and 9:00 a.m. to 6:00 p.m. on Sunday. Further, vibration impacts from construction activities and operations would not exceed human annoyance or building damage threshold.

The nearest public use airport to the Project Site is the Sacramento Executive Airport which lies approximately 1.8 miles to the northwest of the Project Site. As such, the Project Site is not located within the Sacramento Executive Airport CNEL contours. Further, the Project Site is not in the vicinity of a private airstrip.

The proposed on-site residences (Coral Gables) would be located at the middle to north portion of the Project Site, which would be approximately 230 feet from the centerline of Meadowview Road and 875 feet from the centerline of 24th Street. The existing Villa Jardin Apartments are located on the southern portion of the Project Site and are approximately 65 feet from the centerline of Meadowview Road and 860 feet from the centerline of 24th Street. The FHWA RD-77-108 program was used to model traffic noise levels at the proposed on-site residences (Coral Gables) and the existing on-site residences (Villa Jardin) under existing and existing plus Project conditions. The modeled results are shown in **Table NOI-4**, Noise Levels at Proposed Coral Gables Residences and **Table NOI-5**, Noise Levels at Existing Villa Jardin Residences, below. Noise modeling assumptions and results are included in Appendix A of the Noise Technical Memorandum prepared for this Project.

As shown in **Table NOI-4**, existing and existing plus Project noise levels at the proposed Coral Gables residences would not exceed HUD's exterior noise requirement of 65 dBA Ldn. According to the USEPA's Protective Noise Levels, typical buildings in warm climates could provide 24 dBA exterior to interior noise reduction with windows closed. Therefore, interior noise levels at the proposed Coral Gables residences would not exceed HUD's interior noise requirement of 45 dBA Ldn. As depicted in Table NOI-5, the existing and existing plus Project noise levels at the existing Villa Jardin apartments would exceed the HUD's exterior noise requirement of 65 dBA Ldn. According to the HUD guidance, a major rehabilitation project found in a "Normally Unacceptable" Noise Zone (i.e., over 65 dBA) is strongly recommended to attenuate the noise impact. The Villa Jardin rehabilitation would include doublepane windows, new building roofs, new front entrance doors, and updated HVAC that would help attenuate the existing roadway noise from Meadowview Road. Further, as noted in Table NOI-5, the Project's ADT would not have a perceptible noise increase over the existing conditions, as the difference between the existing and existing plus Project noise level would be 0.1 dBA, which is significantly below the Caltrans perceptible noise level threshold of 3 dBA. In addition, the interior noise levels at the existing on-site residences would not exceed HUD's interior noise requirement of 45 dBA.

As described above, the proposed on-site development would not result in any adverse noise effects and would be consistent with HUD's guidance on noise abatement and control. Additionally, while the existing on-site residences (Villa Jardin apartments) are located within an area currently exceeding the HUD 65 dBA Ldn requirement, the rehabilitation of these on-site residences would include substantial upgrades, such as double-pane windows, new air conditioning units, new exterior doors, and new roofs, which would attenuate the noise impact, consistent with HUD guidance. Furthermore, the interior noise level would be below HUD's interior noise requirement of 45 dBA. Therefore, no adverse effect would result from the proposed rehabilitation at the existing on-site residential uses, and the Proposed Project would be consistent with HUD's guidance on noise abatement and control, and no formal compliance steps or mitigation are required.

#### **References:**

Berger, Elliott H., Rick Neitzel, and Cynthia A. Kladden, Noise Navigator Sound Level Database with Over 1700 Measurement Values, July 6, 2010.

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**Table NOI-4 Noise Levels at Proposed Coral Gables Residences** 

Roadway Segment	Existing ADT <sup>1,2</sup>	Existing L <sub>dn</sub> @ 100 Feet from Roadway Centerline	Existing Exterior L <sub>dn</sub> at Proposed On-Site Residences (dBA) <sup>3,4</sup>	Existing Interior L <sub>dn</sub> at Proposed On-Site Residences (dBA) <sup>2, 5</sup>	Existing plus Project ADT <sup>1,2</sup>	Existing plus Project Ldn @ 100 Feet from Roadway Centerline	Existing plus Project Exterior L <sub>dn</sub> at Proposed On-Site Residences (dBA) <sup>3,4</sup>	Existing plus Project Interior L <sub>dn</sub> at Proposed On-Site Residences (dBA) <sup>2,5</sup>	Difference in Exterior dBA
Meadowview Road between Amherst Street and Brookfield Drive.	32,049	64.8	57.6	33.6	32,321	64.9	57.7	33.7	0.1
24 <sup>th</sup> street between Meadowview Road and Florin Road.	17,481	60.8	42.0	18.0	17,753	60.8	42.1	18.1	0.1

ADT = average daily trips; L<sub>dn</sub> = day-night sound level

- 1. ADT along Meadowview Road and 24th Street are from the *City of Sacramento 2035 General Plan: Chapter 3 Mobility Element*, adopted March 3, 2015. As these ADT's were from 2012, a yearly three percent growth rate was applied to calculate the 2020 volumes.
- 2. Project-generated 272 daily trips were added to both segments.
- 3. Traffic noise levels were calculated using the FHWA roadway noise prediction model. Refer to Appendix A, Noise Model Results for noise modeling assumptions and results.
- 4. The proposed on-site residences would be located in the middle to northern portion of the project site, which would be approximately 230 feet from the centerline of Meadowview Road and 875 feet from the centerline of 24<sup>th</sup> Street.

According to the EPA Protective Noise Levels, typical buildings in warm climate could provide 24 dBA exterior to interior noise reduction with windows closed.

Sources: City of Sacramento 2035 General Plan: Chapter 3 Mobility Element, adopted March 3, 2015.

# Table NOI-5 Noise Levels at Existing Villa Jardin Residences

Roadway Segment	Existing ADT <sup>1,2</sup>	Existing L <sub>dn</sub> @ 100 Feet from Roadway Centerline	Existing Exterior L <sub>dn</sub> at Existing On-Site Residences (dBA) <sup>3,4</sup>	Existing Interior L <sub>dn</sub> at Existing On-Site Residences (dBA) <sup>2, 5</sup>	Existing plus Project ADT <sup>1,2</sup>	Existing plus Project Ldn @ 100 Feet from Roadway Centerline	Existing plus Project Exterior L <sub>dn</sub> at Existing On-Site Residences (dBA) <sup>3,4</sup>	Existing plus Project Interior L <sub>dn</sub> at Existing On-Site Residences (dBA) <sup>2,5</sup>	Difference in Exterior dBA
Meadowview Road between Amherst Street and Brookfield Drive.	32,049	64.8	68.5	44.5	32,321	64.9	68.6	44.6	0.1
24th street between Meadowview Road and Florin Road.	17,481	60.8	64.8	40.8	17,753	60.9	60.9	40.9	0.1

ADT = average daily trips; L<sub>dn</sub> = day-night sound level

- 5. ADT along Meadowview Road and 24th Street are from the *City of Sacramento 2035 General Plan: Chapter 3 Mobility Element*, adopted March 3, 2015. As these ADT's were from 2012, a yearly three percent growth rate was applied to calculate the 2020 volumes.
- 6. Project-generated 272 daily trips were added to both segments.
- 7. Traffic noise levels were calculated using the FHWA roadway noise prediction model. Refer to <u>Appendix A</u>, <u>Noise Model Results</u> for noise modeling assumptions and results.
- 8. The existing Villa Jardin Apartment complex is be located in the southern portion of the project site, which would be approximately 65 feet from the centerline of Meadowview Road and 860 feet from the centerline of 24th Street.

According to the EPA Protective Noise Levels, typical buildings in warm climate could provide 24 dBA exterior to interior noise reduction with windows closed.

Sources:

City of Sacramento 2035 General Plan: Chapter 3 Mobility Element, adopted March 3, 2015.

Sole Source Aquifers  Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	Yes No	The Project would involve rehabilitation of existing affordable apartments and construction of new affordable apartments and associated community space in the City of Sacramento. The Proposed Project is not located within a sole source aquifer area, as shown on the USEPA's online mapping portal (the nearest Sole Source Aquifer is approximately 97 miles southwest of the Project Site). Therefore, per HUD guidance, the Project is in compliance with this section.  References:  U.S. Environmental Protection Agency, Map of Sole Source Aquifers in California, generated December 27, 2019. Map generated via U.S. Environmental Protection Agency's ArcGIS online portal. <a href="https://epa.maps.arcgis.com">https://epa.maps.arcgis.com</a>
Wetlands Protection  Executive Order 11990,	Yes No	The Proposed Project would involve new construction, as defined in Executive Order 11990 ("draining, dredging, channelizing, filling, diking, impounding, and related activities and any structures or facilities begun or authorized after the effective date of this Order [May 1977])."

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particularly	As determined using the U.S. Fish and Wildlife Service's National				
sections 2 and 5	Wetland Inventory (NWI), there are no wetlands within or adjacent				
	to the Project Site. The NWI identifies the Sacramento River as the				
	closest riverine feature, which is located 1.7 miles to the west of the Project Site. Given the distance between the Project Site and the				
	Sacramento River, demolition and construction activities associated				
	with the Proposed Project would not result in sedimentation or other				
	impacts that would negatively impact wetland habitats.				
	Further, grading and construction activities associated with the Proposed Project would be required to comply with state stormwater runoff and sedimentation prevention requirements (such as the State Water Resources Control Board's Construction General Permit), and new construction requirements enforced by the City of Sacramento (such as completion of a required Water Quality Management Plan and Stormwater Pollution Prevention Plan, per SCC 13.16). These requirements are discussed further in the Land Development Section of this Environmental Assessment. Because grading- and construction-related sediment would be regulated by state and local water quality protections, and because the nearest surface water feature is approximately 1.7 miles from the Project Site, no wetlands would be impacted in terms of Executive Order 11990's definition of new construction.				
	References:				
	HUD, Wetlands Protection, <a href="https://www.hudexchange.info/programs/environmental-review/wetlands-protection/">https://www.hudexchange.info/programs/environmental-review/wetlands-protection/</a> , accessed December 27, 2019.				
	U.S. Fish and Wildlife Service. National Wetlands Inventory.				
	Wetlands near Coral Gables Court, December 27, 2019 (see attached				
	map).				
Wild and Scenic Rivers	The Project Site is not within the vicinity of a Wild and Scenic River				
Yes I	as identified on the National Wild and Scenic Rivers System,				
Wild and Scenic	operated by the U.S. Fish and Wildlife Service, or the Nationwide Rivers Inventory, operated by the National Park Service. The closest				
Rivers Act of	Wild and Scenic Rivers to the Project Site are the American River				
1968,	and the Cosumnes River, which are located 6.25 miles northeast and				
particularly section 7(b) and	11 miles southeast of the Project Site, respectively. Therefore, the				
(c)	Project is in compliance with this section.				
	References:				
	U.S. Fish and Wildlife Service, National Wild and Scenic Rivers				
	System, Map of California Scenic and Wild Rivers (see attached), Map generated December 27, 2019.				
	U.S. National Park Service, Nationwide Rivers Inventory (see attached map), Map generated December 27, 2019.				
ENVIRONMENTAL JUSTICE					

Environmental Justice  Executive Order 12898	Yes	No 🖂	There were no significant adverse environmental impacts identified in any of the other compliance review portions of this Project's total environmental review. Therefore, there is no adverse environmental impact that would disproportionately occur on low-income and/or minority communities and the Project is compliant with Executive Order 12898.
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Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 & 1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. All conditions, attenuation or mitigation measures have been clearly identified.

**Impact Codes**: Use an impact code from the following list to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor adverse impact May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

Environmen		
tal		
Assessment	Impact	
Factor	Code	Impact Evaluation
LAND DE	EVELOPI	MENT
Conformanc	(2)	Conformance with Plans
e with Plans / Compatible Land Use and Zoning / Scale and Urban Design	No impact anticipat ed	According to the Sacramento Area Council of Government's (SACOG) 2016 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS), the regional population growth is projected to average 33,500 persons per year between 2008 and 2035. The SACOG region is projected to add approximately 11,000 households per year between 2008 and 2035. Historically, household growth was much higher between 2000 and 2005 (approximately 18,000 households per year); however, this trend declined sharply due to the high costs of housing and the recession in the late 2000s. According to the California Department of Finance, the City of Sacramento has an estimated total population of 510,931 (as of January 2020) with an average of 2.7 persons per household. This represents an increase over 2010 population estimates (466,488 with an average persons per household of

2.62) of approximately 44,000 persons, or an average increase of approximately 4,400 persons per year.

The City of Sacramento's 2035 General Plan Land Use Element states that the City shall regulate building density set out in the General Plan and Municipal Code in order to ensure cumulative development would not exceed a population of 640,400 persons. Specifically, the 2035 General Plan estimates that the population in the City of Sacramento would grow to 560,278 in 2025 and to 640,381 in 2035. The Project would result in an increase of 38 residential units through the construction of the Coral Gables portion of the Project. With an average household of 2.7 persons per household, the Project would result in an increase of approximately 103 persons to the population of Sacramento. This increase would represent 0.13 percent of the 2035 General Plan's planned population growth between 2025 and 2035. Further, 38 units of new residential housing would add 38 households to the SACOG region, or approximately 0.3 percent of the number of households that SACOG projects are added in a typical year to the MTP/SCS planning area.

Therefore, because the Project would represent a minute percentage of the projected/anticipated growth in the City of Sacramento's General Plan, and a minute percentage of the total regional growth projected by the MTP/SCS, the Project would not conflict with the population projections in these plans.

Further, the City's General Plan has a number of goals and policies beyond population that the Project contribute to. These goals and policies include:

Land Use and Urban Design Element

• Goal 1: Growth and Change Policy LU 1.1.5: Infill Development. The City shall promote and provide incentives (e.g., focused infill planning, zoning/rezoning, revised regulations, provision of infrastructure) for infill development, reuse, and growth in existing urbanized areas to enhance community character, optimize City investments in infrastructure and community facilities, support increased transit use, promote pedestrian- and bicycle-friendly neighborhoods, increase housing diversity, ensure integrity of historic districts, and enhance retail viability.

#### Housing Element

- Goal H-3.1: Provide a variety of housing options for extremely low-income households.
- Goal H-4: Preserve, maintain, and rehabilitate existing housing to ensure neighborhood liability and promote housing affordability.

The Project would also contribute toward the quantified objectives identified in the Housing Element:

- Construct:
  - o 20 extremely low-income units;
  - o 30 very low-income units; and
  - o 610 low-income units.

- Rehabilitate:
  - o 30 extremely low-income units;
  - o 60 very low-income units; and
  - 200 low-income units.

Additionally, the Project would comply with goals within the City of Sacramento's Citywide Multi-unit Dwelling Design Guidelines. These guidelines include recommendations on topics such as building placement and orientation, landscaping, building materials, common spaces, parking, and lighting. Reviewers, such as the City's Planning and Design Commission, use the design principles to provide consistent, objective, and fair reviews of proposed projects.

Project design features, such as common spaces with play equipment and benches, picnic areas, a community building with amenities such as common rooms and laundry facilities, landscaping, and pedestrian pathways, comply with many of the recommendations in the Design Guidelines, including, but not limited to:

- 1-1: Residential buildings should be arranged to provide functional public and private outdoor spaces.
- 1-4: Encourage appropriate amenities to serve anticipated residents (e.g., on-site childcare and play lots for projects for families with children, less parking and more walking paths, etc.).
- 1.5: Active common spaces should encourage gatherings and avoid noise, light, and other potential conflicts with adjacent neighbors.
- 1.6: Infill development within existing neighborhoods should be sensitively designed to respect existing residential patterns and development, and reinforce the character and functional relationships of existing neighborhoods.
- 2-4: Building ends should contain windows and active spaces to provide for additional security, and visual interest.
- 2-6: Pedestrians should have clear, unobstructed access to the street and nearby transit stops.
- 4-1: Surface parking lots should be located away from the adjacent public roadways, to the rear of (or beneath) buildings where possible. Parking areas should not be located adjacent to public roadways.
- 6-4: Common facilities such as recreation rooms, laundry and mail areas should be located adjacent to common open space to increase activity in these areas.
- 6-5: Common open spaces should be designated as a visible, accessible transition between the street and individual units.
- 7-1: Exterior site design and landscaping should provide functional recreational spaces and/or community site amenities.
- 7-5: Incorporate appropriate landscaping that includes a variety of trees, shrubs, and other plantings. Unpaved areas should be planted with irrigated plant materials. Unpaved areas where landscaping

- would be challenging should be mulched to minimize weed growth and improve appearance.
- 7-8: Landscaping should be in scale and compatible with the project and adjacent land uses.

#### Compatible with Land Use and Zoning

The following analysis focuses on the new construction portion of the Project (i.e., the Coral Gables Project with construction of 38 new affordable housing units). According to the City of Sacramento Planning and Development Code, the Project Site is classified as R-3 on the southern portion of the Site containing the Villa Jardin apartments and R-3-R on the northern portion of the Site, where the Coral Gables apartments are proposed. According to the City of Sacramento Planning Department, there is no difference between zone R-3-R and zone R-3. The second 'R' in the R-3-R designation refers to a section that has been removed from the City Code. In short, development on the entire Project Site is governed by R-3 design and construction standards.

The purpose of the R-3 zone is to accommodate traditional types of apartments. This zone is located outside the central city, serving as a buffer along major streets and near shopping centers. The maximum building height is 35 feet, the maximum density is 30 dwelling units per net acre, the maximum lot coverage is 50 percent, and the minimum lot size is 2,000 square feet. The front yard minimum setback is 10 feet and the rear yard setback is 15 feet. The City of Sacramento General Plan designates the Project Site as Suburban Neighborhood High (15-30 dwelling units per acre) with a floor area ratio (FAR) between 0.35 and 1.55. Per SCC Sections 17.208.310 and 17.228.117, multi-unit dwellings in R-3 zones must have a manager residing on-site. Section 17.608.030B of the SCC requires 1.5 parking spaces per unit since the Project is located in what the City classifies as a Suburban District. Therefore, the total parking requirement for the Coral Gables Project (with 38 residential units) would be 57 parking spaces; however, up to 75 percent of the required number of off-street parking spaces may be waived with a director-level site plan and design review.

Chapter 17.704 of the SCC provides density bonuses, waivers, and incentives for affordable housing projects and establishes procedures to implement the State Density Bonus Law in Government Code Section 65915. As discussed in Section 17.704.030 of the SCC, a project can receive up to a 35 percent density bonus for development of affordable housing units. As the Project would include 100 percent affordable housing, it would qualify for the maximum density bonus (35 percent) pursuant to SCC Section 17.704.030. Therefore, while the maximum density of the R-3 zone is 30 dwelling units per acre, a density bonus of 35 percent would increase this maximum density to 40.5 dwelling units per acre. While only a portion of the Project would include new construction, the Project would be evaluated by the City as a whole for purposes of determining compliance with the zoning code and General Plan. As such, the Project would include a total of 82 dwelling units on 2.32 acres of land, or 35.3 dwelling units per

acre. Therefore, because multiunit residential is an allowable use within the R-3 zone, and with a density bonus pursuant to Section 17.704.030 of the SCC, the Project's density would be consistent with the Project Site's zoning and General Plan designation.

While the Project would provide 38 parking stalls, less than the 57 normally required per Section 17.608.030B of the SCC, 38 parking stalls may be allowed per the above-described director-level site plan and design review. Further, the Project would be required to comply with wall and fence regulations, as outlined in Section 17.620.100 of the SCC, as well as building height and setback regulations, as outlined in Chapter 17.208, Article III of the SCC.

Additionally, the Project would qualify for additional incentives (such as reduced lot coverage, increased maximum building heights, reduced parking standards, and/or reduced minimum outdoor or private living areas), pursuant to Chapter 17.704 of the SCC. As such, with final approval of designs by City of Sacramento Planning staff, the Project would be consistent with current SCC zoning regulations.

#### References

City of Sacramento, Planning and Development Code, Zoning Mapbook, Map Page U9, August 2014.

City of Sacramento, 2035 General Plan Land Use and Urban Form Diagram, February 22, 2017.

City of Sacramento, General Plan, Land Use and Urban Design Element, March 3, 2015.

City of Sacramento, General Plan, Housing Element, December 17, 2013.

City of Sacramento, Multi-Unit Dwelling Design Guidelines, Citywide Design Review Area, June 2019.

Price, Deja, Junior Planner, personal communication, City of Sacramento, June 10, 2020.

Sacramento Area Council of Governments, 2016 MTP/SCS, Appendix D-1: Regional Projections, December 2013.

# Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff

(2) No impact anticipat ed

#### Soil Suitability and Slope

The southern portion of the Project Site, consisting of the Villa Jardin apartment complex, is relatively flat and is currently improved with 11 two-story apartment buildings arranged around an L-shaped parking lot. The northern portion of the Project Site, which is the proposed location of the Coral Gables component of the Project, is also relatively flat and has a gentle slope downward towards the southeast (from the north of the vacant lot toward Coral Gables Court).

The Project Site is located within a large region known as the Great Valley geomorphic province, which consists of an alluvial plain, approximately 50 miles wide and 400 miles long between the Coast Range and the Sierra

Nevada mountain ranges. A geotechnical engineering report prepared for the Coral Gables portion of the Project Site documented 1.5-inch-wide vertical cracks in the ground surface of the Site that are consistent with the presence of highly expansive clay soils. Further, soil borings determined that the Coral Gables portion of the Project Site is underlain with about 5 to 7 feet of stiff to very stiff, fat clay. Beneath this surficial clay, subsurface materials encountered at the soil boring locations generally consist of very stiff to hard sandy silt and very dense silty sand to a depth of about 28 feet below ground surface, where groundwater was encountered. As groundwater was encountered 28 feet below ground surface, it is not expected to impact the Proposed Project construction. Historic groundwater elevation is estimated to be around 12 feet below ground surface and is expected to vary seasonally, annually, and from location to location.

As stated above, soil deposits, generally consisting of expansive fat clay near the ground surface and lean clay, silt and poorly graded sand below, were encountered at the Site. Fine grained soils were observed to be stiff to hard, while coarse soils were observed to be medium dense to very dense. As such, the Geotechnical Study prepared for this Project determined that the near-surface soils are not suitable for conventional shallow foundation and floor slab support and provides recommendations to address impacts related to soil stability. Further, the analysis states that the Project should follow a series of construction recommendations, as well as all applicable state (i.e., California Building Code) and local building standards to ensure soil suitability and building safety. The construction recommendations relate to Site preparation (e.g., clearing existing vegetation/root systems and replacement with engineered fill, over-excavating parking and drive aisle areas and backfilling with engineered fill, treating subgrade materials to prevent excessive movement, avoiding grading activities between October and April (or stabilizing the subgrade with aggregate); engineered fill (e.g., design criteria for engineered fill used on the Project Site); excavations (e.g., establishing limitations for cut or fill slopes, complying with regulations related to how personnel enter utility trench excavation, and protecting excavation areas from the elements and from actions of repetitive or heavy construction loadings); foundations (e.g., providing options for conventional shallow foundations and for post tensioned slabs and what level of site preparations are required for each); pavement recommentations (e.g., preparation of subgrade soils for new pavements and moisture control near paved areas); corrosivity (e.g., consulting a qualified corrosion engineer as soils are characterized as being highly corrosive to cast iron and ductile iron piping); and construction monitoring (e.g., continuous testing of engineered fills to ensure uniformity of compaction). The full list of recommendations is provided in the Geotechnical Engineering Report, prepared by PSI for the Proposed Coral Gables Project.

#### **Erosion, Drainage, and Stormwater Runoff**

There are no watercourses or drainage features on or adjacent to the Project Site that would be impacted by the Proposed Project. While Project-related

construction would result in ground disturbance, the Project would be required to include appropriate sediment and pollution control measures. Specifically, stormwater-related erosion of uncovered soils during construction activities would be prevented by complying with local sediment and pollution control measures, in accordance with the area-wide National Pollution Discharge Elimination System (NPDES) stormwater permit, regulating discharge of urban runoff from the Municipal Separate Storm Sewer System, issued by the Central Valley Regional Water Quality Control Board. This NPDES permit requires the City of Sacramento to develop pollutant control programs for urban stormwater runoff discharges. Further, because the Project Site is greater than 1 acre in size, the Project would be required to comply with the State Water Resources Control Board Construction General Permit, which requires construction activities to incorporate BMPs, which could include the use of berms or drainage ditches to divert water around the site and preventing sediment from migrating off-site by using temporary swales, filters, or silt fencing.

At the local level, grading and construction activities associated with the Proposed Project would be required to comply with the City of Sacramento's Grading, Erosion, and Sediment Control Ordinance (Section 15.88 of the SCC, Ordinance No. 93-068), which requires preparation of an erosion and sediment control plan (ESC plan), and compliance with processes outlined in the City of Sacramento's Grading and Erosion and Sediment Control manual. The Grading and Erosion and Sediment Control manual outlines the requirements to obtain grading and building permits and provides guidance on minimum stormwater quality standards to be used in the preparation of ESC plans in accordance with the City's Grading, Erosion, and Sediment Control Ordinance. An ESC plan consists of a set of BMPs or equivalent measures designed to control surface runoff and erosion, retain sediment on a particular site, and prevent pollution of site runoff during the period beginning when any preconstruction- or construction-related grading or soil storage first occurs, until all final improvements and permanent structures are completed.

Once occupied, the Coral Gables portion of the Project Site, which is currently undeveloped, would be covered by impervious surfaces and managed gardens/turf areas, and thus, would not be susceptible to substantial erosion or siltation. The Coral Gables development would tie into the existing stormwater drainage system on the Project Site, which conveys stormwater from the Project Site to existing stormwater infrastructure in Meadowview Road. Further, the Project would be required to comply with SCC 13.08.145, which states that when a property contributing to a storm drain system or combined sewer system is developed, all project-related stormwater and surface runoff drainage impacts shall be fully mitigated to ensure that the project does not affect function of the storm drain or sewer system. Additionally, the Project would be required to comply with stormwater discharge requirements enforced by the City of Sacramento, such as completion of a Stormwater Pollution Prevention Plan (SWPPP), per Chapter 13.16 of the SCC. Examples of typical best practices in SWPPPs include storing materials and equipment to ensure that spills or leaks do not enter a storm drain or a surface water feature and installing filters or sediment traps preventing

contaminants from entering storm drains. Therefore, because the Project would be required to comply with existing local and regional water requirements, the Project would result in less than significant impacts related to water quality.

#### **References:**

California State Water Resources Control Board, Construction General Permit,

https://www.waterboards.ca.gov/water\_issues/programs/stormwater/construction.html, accessed June 24, 2020.

City of Sacramento, Municipal Code Section 15.88, City Grading, Erosion, and Sediment Control.

City of Sacramento, Municipal Code Section 13.16, Stormwater Management and Discharge Control.

City of Sacramento, Administrative and Technical Procedures Manual for Grading and Erosion and Sediment Control, October 2013.

Professional Service Industries, Inc., Geotechnical Engineering Report for the Proposed Coral Gables Multi-Family Residential Development, November 25, 2019.

#### Hazards and Nuisances including Site Safety and Noise

## (2) No impact anticipat ed

## **Hazards and Site Safety**

The Project Site is located in an urbanized area and is not in the vicinity of most natural hazards, including hazardous terrain, volcanoes, steep slopes/landslide areas, and fire-prone areas. The Project Site does not include any known poisonous plants, animals, or insects, nor is it located in an area susceptible to wind or sandstorms. The Project Site is located within a 500-year floodplain; however, it is located in an area with reduced flood risk due to levees, which are located south and west of the Project Site. Pursuant to Policy PHS 3.1.1, in the Sacramento 2035 General Plan, which states that the "City shall ensure building and sites are investigated for the presence of hazardous materials and/or waste contamination before development for which City discretionary approval is required," a Phase I Environmental Site Assessment (ESA) was completed for this Project. This study, as well as the follow-up Phase II ESA, is discussed further in the Contamination and Toxic Substances Section of this EA, above.

The Geotechnical Engineering Report prepared for the Coral Gables component of the Project states that the Project Site is not situated within a mapped earthquake fault zone, nor do any mapped faults cross the site. However, the Project Site would be affected by seismic shaking as a result of earthquakes on major active faults given that there are many active faults in the Northern California region. The Project would be subject to the 2019 California Building Code, which requires the design of structures to consider dynamic forces resulting from seismic events. The Geotechnical Engineering Study prepared for the Coral Gables component of the Project conducted a hazard assessment and determined that, based on soil conditions and depth to groundwater, dry seismically induced settlement and liquefaction are not considered design constraints for the

Project and the potential for ground rupture, lateral spreading, or ground surface disturbances is very low. Expansive soils found on the Project Site would experience significant volumetric changes corresponding to changes in moisture, which could have adverse impacts on building foundations. The report provides recommendations for mitigating the expansive soils on the Project Site, as described above.

#### **Nuisances**

A field inspection of the Project Site identified no evidence that the Project Site would be affected by gas, smoke, or fumes; odors; vibration; glare from adjacent industrial or commercial uses; vacant buildings; unsightly land uses; front lawn parking; abandoned vehicles; or vermin infestation from the uses surrounding the Project Site. A pest report completed in September 2019 documents multiple instances of dry rot, wood decay fungi, and deteriorating rain gutters, plumbing, and flooring in some units of the existing Villa Jardin apartment complex. No termites or other wood destroying pests/organisms were detected through this investigation. The purpose of the Proposed Project would be to address these deteriorating features of the Villa Jardin apartment complex through the rehabilitation activities identified in the project description of this Environmental Assessment.

#### **Noise**

The Project itself would not be a noise-generating facility. Noise generated by the Project is addressed in the Noise Abatement and Control section, above.

#### **References:**

City of Sacramento, 2035 General Plan, Public Health and Safety Element, 2015.

Google Earth, map data 2020.

Highlander Termite and Pest Control, Inc., Wood Destroying Pests and Organisms Inspection Report: Villa Jardin, September 25, 2019.

Professional Service Industries, Inc., Geotechnical Engineering Report for the Proposed Coral Gables Multi-Family Residential Development, November 25, 2019.

# Energy Consumptio n

(2) No impact anticipat ed

#### **Energy Usage**

An increase in energy consumption would result from the development of the Project; however, the Project would be required to comply with the 2020 California Green Building Standards Code (CALGreen, Title 24, Part 6), which require the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The 2019 update to the Title 24 standards

includes energy-efficient improvements to residential development, including photovoltaic panel standards, as well as improved wall, attic, water heating, and lighting standards.

The Project Site is located in an urban environment, which is within walking distance (one-half mile) of a corner market; multiple churches and schools; and recreation assets, such as baseball fields, parks, and the Pannell Meadowview Community Center. Further, the Project is within one-half mile of the Meadowview light rail station, where residents could take the Blue Line (Sacramento Regional Transit, 533-Blue Line) to downtown Sacramento or other regional attractions, such as commercial centers, the Sacramento Zoo, and Sacramento City College. As a result, the Project would encourage walking and transit usage, resulting in less energy consumption than a similar development in an auto-dependent, rural area.

Therefore, compliance with required local and state energy efficiency and design review requirements, as well as the close proximity of the Project Site to amenities, services, and transit service, would ensure that the Proposed Project would not result in a significant source of energy consumption

#### **Energy Utilities and GHG Emissions**

The Sacramento Municipal Utility District (SMUD) is responsible for the generation, transmission, and distribution of electrical power to its 900 square mile service area, which includes the Project Site. SMUD is a publicly owned utility that has arrangements with other area electricity providers to purchase and sell short-term power to meet load requirements and reduce costs. SMUD's power sources include 20 percent renewable (biomass, geothermal, hydroelectric, solar, and wind), 26 percent large hydroelectric, and 54 percent natural gas. Further, SMUD is required to comply with the state's Renewables Portfolio Standard, which requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total procurement by 2020 and to 60 percent by 2030. Natural gas is supplied to the Sacramento area by Pacific Gas and Electric (PG&E). The Master Environmental Impact Report prepared to support the Sacramento 2035 General Plan Update outlines a series of service upgrades that PG&E plans to implement in the Sacramento area. which are designed to reduce the overall cost of meeting future customer load growth, avoiding stranded assets, and ensuring reliable service to customers in Sacramento. No major upgrades to the electrical or natural gas delivery system are anticipated as a result of this Project. This is because overall projections put forth by the California Energy Commission's 2014-2024 California Energy Demand Forecast suggest that natural gas demand is likely to decrease due to local and regional efficiency initiatives, higher projected natural gas rates, and climate change, resulting in projected decreases in heating degree days. The annual growth rate for electricity demand is projected to be between 0.76 and 1.54 percent for low energy demand and high energy demand scenarios, respectively. As such, overall electricity demand is not anticipated to increase significantly. The long-term impact from the

increased energy use by the Proposed Project is not significant in relationship to the total number of consumers served by SMUD and PG&E; therefore, the Project would not require expansion of energy or natural gas facilities.

The majority of GHG emissions associated with construction of the Proposed Project would occur during the grading and site preparation phase of the Coral Gables construction component of the Project, because it would involve the use of large construction equipment, generators, and haul trucks, which produce GHG emissions. These GHG emissions would be temporary in nature, occurring during the 14-month construction period. Temporary energy use during construction of the Proposed Project would not result in a significant increase in peak or base demands on regional energy supplies or require additional capacity from local or regional energy supplies, and it would not result in inefficient or unnecessary consumption of energy resources during Project construction. During operation, the primary contributor of GHG emissions for the Proposed Project would be internal combustion vehicles used by residents and guests of the Project and any internal combustion landscape maintenance equipment used to maintain common-space areas and decorative landscaping. Due to the California Air Resources Board's (CARB) increasing vehicle efficiency standards, it is assumed the longterm transportation fuel consumption from Project operation would steadily decline over time. Therefore, GHG emissions associated with operation of the Project are not anticipated to be significant due to existing federal and state vehicle emissions regulations and the relatively small size of the Project in comparison to the region and state as a whole. Air quality impacts associated with GHG emissions are discussed further in the Clean Air section of this Environmental Assessment.

#### **References:**

California Energy Commission, California Energy Demand, 2014-2024 Revised Forecast, September 2013.

California Energy Commission, 2019 Building Energy Efficiency Standards for Residential and Non Residential Buildings, <a href="https://ww2.energy.ca.gov/2018publications/CEC-400-2018-020/CEC-400-2018-020-CMF.pdf">https://ww2.energy.ca.gov/2018publications/CEC-400-2018-020/CEC-400-2018-020-CMF.pdf</a>, accessed July 2020.

California Public Utilities Commission, Renewables Portfolio Standard Program, https://www.cpuc.ca.gov/rps/, accessed January 13, 2019.

Sacramento Municipal Utility District, 2018 Power Content Label, July 2019.

Environmental	Impact	
Assessment Factor	Code	Impact Evaluation

SOCIOECONOMIC			
Employment and Income Patterns	(2) No impact anticipated	The Proposed Project would involve rehabilitation of an existing affordable housing apartment complex and construction of 38 affordable housing units. A minor increase in construction-related employment opportunities would occur as a result of rehabilitation and construction phases of the Project; however, the Project would not significantly increase or decrease temporary and/or permanent employment opportunities and would not affect income patterns.	
Demographic	(2)	Demographic Character Changes	
Character Changes, Displacement	No impact anticipated	The Project would consist of the rehabilitation of an existing 44-unit, affordable housing complex; construction of 38 affordable housing units; and construction of a shared community center. No existing residential units would be removed as part of the Proposed Project. Therefore, the Project would provide more housing opportunities for low-income households.	
		There are no design features as part of the Proposed Project that would isolate a particular neighborhood or population, making access to local services, facilities, and institutions or other parts of the City more difficult. Rather, the Project would be located near community recreation assets like the Pannell Meadowview Community Center, and transportation assets like Meadowview light rail station, which reduces physical barriers and population isolation.	
		Further, the Project Site is surrounded by single-family homes to the north, multifamily residential buildings to the west and east, and the Pannell Meadowview Community Center and a City of Sacramento Solid Waste Department property to the south, across Meadowview Road. Because of the diversity of Project land uses in the area, the Project would not create a significant concentration of low-income or disadvantaged people in violation of HUD site and neighborhood standards and HUD Environmental Justice policies.	
		Displacement	
		The Project Site currently contains 44 affordable housing units, all of which would be rehabilitated as part of the Proposed Project. As such, the Project would not result in the removal of any housing units. Rather, the Project would result in the construction of 38 new affordable housing units on a currently vacant portion of the Project Site. Therefore, the Project would not result in displacement of any residents.	

Further, the SHRA has identified a shortage of housing,
including available low- and moderate-income housing. The
Project would help to meet this need.

	1				
Environmental	Impact				
Assessment Factor	Code	Impact Evaluation			
<b>COMMUNITY F</b>	ACILITIE	S AND SERV	ICES		
Educational and Cultural Facilities  (2) No impact anticipated  (3) No impact school District (SCUSD). Specifically, the Project be served by Edward Kemble Elementary School, C Elementary School, Rosa Parks Middle School, Burbank High School. The following table providence in the Proposed Project Site is located within the Sacramento of School District (SCUSD). Specifically, the Project Site is located within the Sacramento of School District (SCUSD). Specifically, the Project Site is located within the Sacramento of School District (SCUSD). Specifically, the Project Site is located within the Sacramento of School District (SCUSD). Specifically, the Project Site is located within the Sacramento of School District (SCUSD). Specifically, the Project Site is located within the Sacramento of School District (SCUSD). Specifically, the Project Site is located within the Sacramento of School District (SCUSD). Specifically, the Project Site is located within the Sacramento of School District (SCUSD). Specifically, the Project Site is located within the Sacramento of School District (SCUSD). Specifically, the Project Site is located within the Sacramento of School District (SCUSD). Specifically, the Project Site is located within the Sacramento of School District (SCUSD). Specifically, the Project Site is located within the Sacramento of School District (SCUSD). Specifically, the Project Site is located within the Sacramento of School District (SCUSD). Specifically, the Project Site is located within the Sacramento of School District (SCUSD). Specifically, the Project Site is located within the Sacramento of School District (SCUSD). Specifically, the Project Site is located within the Sacramento of School District (SCUSD). Specifically, the Project Site is located within the Sacramento of School District (SCUSD). Specifically, the Project School District (SCUSD) is located within the Sacramento of School District (SCUSD) is located within the Sacramento of School District (SCUSD) is located within the Sacramento of Scho			ject Site would l, Cesar Chave ool, and Luthe ovides the tota for each of the		
		attend, as provide completed for the		35 General Pla	-
		P	roject Site Scho		t
		School	Enrollment	Capacity	Address
		Edward Kemble Elementary School	512	670	7495 29 <sup>th</sup> Street
		Cesar Chavez Elementary School	301	546	7500 32 <sup>nd</sup> Street
		Rosa Parks Middle School	465	907	2250 68 <sup>th</sup> Avenue
		Luther Burbank High School	1,828	2,113	3500 Florin Road
		Source: City of Sacra Report, Table 5-21,		al Plan Public Ser	vices Background
		The Proposed Pr housing units an housing units. So Jardin developm	d would constructudents residing	ct an additiona in the existing	al 38 affordable g 44-unit, Villa

above enrollment and capacity values. Therefore, because the Villa Jardin rehabilitation would not result in an increased number of units, this portion of the Proposed Project would not

		impact area school capacity. The Coral Gables component of the Project, which proposes to construct 38 new units of affordable housing on a vacant lot immediately adjacent to the existing Villa Jardin apartments, would increase the number of students attending these area schools. Based on the average student rate analysis completed by the SCUSD, a new multifamily residential unit would generate an average of 0.26 K-12 students. Using this student generation factor, the Coral Gables component of the Project would be expected to generate approximately 10 K-12 students (38 units * 0.26 = 9.88, rounded to 10). As shown in <b>Table EDU-1</b> , all of the schools serving the Project Site are well under the capacity of each facility. Therefore, the additional students generated by the Proposed Project would not exceed school capacity.
		References: City of Sacramento, 2035 General Plan Public Services Background Report, Table 5-21, March 2015.
		Sacramento City Unified School District, Developer Fee Justification Report, March 2012.
Commercial Facilities	(2) No impact anticipated	The Project would consist of rehabilitation of an existing residential development, and infill construction of a 38-unit residential complex with a community center shared by the two developments. There is a wide range of retail and commercial services with a variety of price ranges within a 1-mile radius of the Project Site, including the Florin Road commercial corridor between 24th Street and 29th Street, approximately 1 mile north of the Project Site (which includes a supermarket, gas stations, restaurants, and a pharmacy). Further, public transportation is available at the Meadowview Blue Line light rail station, located approximately one-half mile east of the Project Site, which provides access to downtown Sacramento and other regional commercial centers. Therefore, existing commercial facilities serving the Project Site are adequate and accessible and no adverse Project-related impact would occur.
Health Care and Social Services	(2) No impact anticipated	There are no public hospitals serving the Project area; rather, Sacramento County contracts with private hospitals to serve area residents. The nearest hospitals with emergency services to the Project Site include the Kaiser Permanente South Sacramento Medical Center and Methodist Hospital, which are located approximately 3 miles east of the Project Site. Five other hospitals with emergency services are located in downtown Sacramento and would be accessible from the Project Site via the Meadowview Blue Line light rail station located near the Project Site. Kaiser Permanente South

Sacramento Medical Center is a 179-bed hospital with 24-hour emergency services, internal medicine, and specialty medical services, in addition to alcohol and drug abuse programs, HIV/AIDS services, home health, hospice, nutrition, optometry, perinatal, physical therapy, and social services. Mercy General Hospital is a 343-bed hospital, which provides emergency services, an eye institute, home care services, and a preventative health center.

First-response emergency services are provided by the Sacramento Fire Department (SFD), which operates out of the Public Safety Center, located at 5770 Freeport Boulevard. The SFD operates multiple engine companies evenly dispersed throughout the City, each with four personnel. The Project Site is served by Station No. 16, located at 7363 24<sup>th</sup> Street, located approximately one-half mile northwest of the Project Site. Therefore, adequate health care services, including emergency medical services, are available to serve the Project.

The Project would result in a minor increase in the population in the City of Sacramento, as discussed in previous sections. However, the Sacramento County Health and Social Services Department provides state and federally mandated benefits and services to low-income residents in Sacramento and Sacramento County. Such benefits and services include adoption and foster care services, protective services, public health and immunizations, and other social services such as HIV and other sexually transmitted disease testing, mental services. CalFresh (food stamps) program administration, and veterans' services. Therefore, adequate social services would be available to residents of the Project Site.

#### **References:**

City of Sacramento, 2035 General Plan Public Services Background Report, March 2015.

Sacramento County, Health and Social Services Department homepage (list of services), <a href="https://www.saccounty.net/live-visit/Pages/HealthSocialServices.aspx">https://www.saccounty.net/live-visit/Pages/HealthSocialServices.aspx</a>, accessed January 13, 2020.

# Solid Waste Disposal / Recycling No impact anticipated

As of 2011, the City of Sacramento generated over 420,000 tons of solid waste per year, including everything from recycling to construction demolition materials to garden refuse. The City of Sacramento collects approximately one half of this waste, with the remainder collected by private parties, such as franchise haulers. Refuse from the south side of the City, where the Project Site is located, is transported to the Sacramento Recycling and Transfer Station, which is located at 8491 Fruitridge Road. This refuse is then conveyed to and disposed

of at the Sacramento County Kiefer Landfill. The Kiefer Landfill is a Class III solid waste facility located in eastern Sacramento County, which collects 10,815 total tons of refuse per day. As of 2012, 30 million cubic yards of refuse has been placed at the Kiefer Landfill, which has a total permitted capacity of 117.4 million cubic yards. As of 2012, Sacramento County estimated that based on projected waste flows, the facility had approximately 65 years of capacity remaining.

The City's Construction and Demolition Debris Recycling Ordinance applies to all new building permits and states that projects must divert (recycle or reuse) 50 percent of all construction-generated debris. Further, the 2035 General Plan indicates that the City has met or exceeded the state's annual per capita disposal rate per resident and employee since the state established targets in 2007.

While the development of new housing would have a corresponding incremental increase in residential solid waste and recycling generation, the generation of the waste can be accommodated by the existing landfills and recycling infrastructure. The solid waste generated by the Proposed Project would be typical of the types of wastes generated by multifamily residential land uses throughout the City of Sacramento. Nothing inherent in the Project description or in the type or intensity of land uses would indicate that the Project would generate a higher than normal level of typical municipal solid waste, or that it would generate any unique or hazardous types of wastes requiring unusual disposal methods. Therefore, given that there is existing landfill capacity, and that the City administers a recycling and household hazardous waste disposal program, the Project would not result in significant impacts related to solid waste or recycling.

#### **References:**

City of Sacramento, 2035 General Plan Utilities background report, March 2015.

Sacramento County, Integrated Solid Waste Management Systems: SWANA 2012 Excellence Award Application, 2012.

Waste Water / Sanitary Sewers (2) No impact anticipated Wastewater in the Sacramento area is collected by both the City and the County, depending on location. The Sacramento Regional County Sanitation District (Regional San) and the Sacramento Area Sewer District (SASD) provide both collection and treatment services for portions of the City of Sacramento. The Project Site is located within the service area of Regional San, which serves a total of 1.4 million residents. Wastewater is collected by a local sewer system maintained by the City of Sacramento and conveyed to the Sacramento Regional Wastewater Treatment Plant (SRWTP) via a system of large diameter pipes and pump stations. The SRWTP is permitted to treat an average dry weather flow of 181 million

gallons per day (mgd) and a daily peak wet weather flow of 392 mgd. As of 2018, the SRWTP treats an average of 130 mgd. Once treated, some of the water is recycled, with the rest safely discharged into the Sacramento River. Further, Regional San's EchoWater Project is upgrading the wastewater treatment plant by constructing nutrient removal facilities, installing nitrifying sidestream treatment equipment, and expanding existing filtration facilities. Once this expansion is complete in 2023, ammonia discharges from the SRWTP will be reduced by 99 percent and the SRWTP will produce more recycled water for use in irrigation.

The City of Sacramento's sewer collection system is made up of a combined sewer system in the older, central city area of Sacramento, and a separate sewer system in the northeast, south, and southwest portions of the City. Wastewater is conveyed to the Regional San's treatment system by force mains or gravity collection pipes. The Project Site is located in an area served by the City's separated sewer system with gravity collection pipes.

The Project Site is currently developed with the 44-unit, Villa Jardin affordable housing apartment complex. Because the Project proposes to rehabilitate this existing affordable housing complex, there would not be a change in the number of units available at the Villa Jardin apartment complex and, therefore, no change in the amount of wastewater generated by these units. The Coral Gables apartment complex and community center (the second component of the Proposed Project) would be constructed on a currently vacant site and would result in 38 new dwelling units. As stated above, the SRWTP is permitted to treat an average dry weather flow of 181 mgd and as of 2018, treats an average of 130 mgd. As such, the SRWTP has a capacity of 51 mgd. The Project, with a net increase of 38 residential units, would not represent a substantial increase in the SRWTP's service population of 1.4 million residents. Further, the City's Sewer System Management Plan includes a System Evaluation and Capacity Assurance Plan, where the long-term needs of the City's sewer infrastructure are periodically reviewed and addressed through improvement projects such as increases in pipe sizes, storage capacities, and ensuring system redundancy. This long-term planning ensures that the City's sewer system has capacity to meet growth within the service area.

Because the SRWTP has adequate treatment capacity to serve the Project and because the City of Sacramento's conveyance system has adequate capacity to serve the Project, the Project would not require the construction of additional facilities to meet anticipated wastewater treatment needs.

		References:
		Sacramento Regional County Sanitation District, State of the District Report, 2018.
		City of Sacramento, Department of Utilities, Sewer System Management Plan 2018-2019.
Water Supply	(2) No impact anticipated	The City provides water to wholesale and retail customers and is therefore required to conduct long-range planning through preparation of Urban Water Management Plans (UWMPs) every five years. According to the 2015 UWMP for the City of Sacramento, the City provided water to 135,830 customer connections and supplied 86,031 acre-feet (AF) of water in 2015 to wholesale and retail customers (84,832 AF for retail customers and 1,199 AF for wholesale customers). Approximately 83 percent of the retail water supply is derived from the Sacramento River and the American River. The remaining water is derived from groundwater and mutual aid agreements (utilized in emergencies). Of the water provided to retail customers, the largest user in the City is single-family residential land uses, which account for approximately 42 percent of overall demand. Multifamily residential land uses account for approximately 17 percent of overall demand. Total retail water demand is anticipated to increase from 84,832 AF in 2015 to 123,229 AF in 2020. This is primarily due to the increase in population of the City's water service area (a population of 480,105 in 2015 and an anticipated population of 528,866 in 2020).
		The UWMP projects that, under normal year supply and demand scenarios, supply would exceed demand in 2020, 2025, 2030, and 2035 by between 132,390 AF and 152,668 AF. These values are unchanged when evaluating the multiple dry year scenario. This is because the City is allowed to divert the same amount of water from the American River and the Sacramento River so long as the total combined diversion from both rivers does not exceed the Maximum Combined Diversion specified in an existing water rights settlement reached between the City and U.S. Bureau of Reclamation. Therefore, based on current management practices, the City would have sufficient water supplies to serve the Proposed Project.
		References:
		City of Sacramento, 2015 Urban Water Management Plan, June 2016.
Public Safety -	(2)	Police
Police, Fire and Emergency Medical	No impact anticipated	The Proposed Project would be served by the City of Sacramento Police Department (Sacramento PD). Sacramento PD has multiple facilities located throughout the city within

four area commands (North, Central, East, and South). The Project Site is located in the South area command. The nearest Sacramento PD facility to the Project Site is the Public Safety Center (shared with Sacramento Fire Department), located at 5770 Freeport Boulevard (approximately 3 miles north of the Project Site), and the Rooney Station, located at 5303 Franklin Boulevard (approximately 3.1 miles north of the Project Site). Overall, the Sacramento PD supports 1,052 full-time equivalent positions (751 sworn and 301 civilian) according to the most recently available annual report (2016). The median response time for priority service calls has increased from 0:08:05 in 2011 to 0:09:57 in 2016. This increase is partially due to an increase in calls for service, as well as increasing traffic congestion coincident with the increasing population of Sacramento.

As stated above, the Proposed Project would develop 38 new units of housing, which would house approximately 103 persons based on California Department of Finance data.<sup>2</sup> As such, the Project would account for approximately 0.2 percent of the projected population growth within the City of Sacramento between 2019 and 2025 and approximately 0.08 percent of projected population growth between 2019 and 2035.<sup>3</sup> Further, the Project would not present any unique features or operational aspects that could reasonably be expected to result in an increased need for police facilities. Additionally, 2035 General Plan contains Policy PHS 1.1.4, which mandates that the City of Sacramento's police services keep pace with all development and growth within the City to ensure that adequate facilities and staffing are available to serve residents. Therefore, given the relatively small increase in population associated with the Project, and the lack of design features that would create public safety concerns, adequate police protection would be provided to the Project with existing and planned resources.

#### Fire

Fire protection and emergency services are provided by the City of Sacramento Fire Department. The nearest fire station to the Project Site is located at 7363 24<sup>th</sup> Street, approximately 0.6 miles north of the Project Site.

The Project Site is located within a fully urbanized area with an urban street network, a fully pressurized water system, and

The California Department of Finance estimates that there is an average of 2.7 persons per household in the City of Sacramento. Therefore, because the Proposed Project would construct 38 new affordable housing units, the Project would result in a population increase of approximately 103 persons.

The population of the City of Sacramento in 2020, per the California Department of Finance, is 510,931. The 2035 General Plan estimates that the population in the City of Sacramento would grow to 560,278 in 2025 and to 640,381 in 2035. Therefore, the estimated 103 persons associated with the Project would be responsible for 0.13 percent of anticipated population growth between 2025 and 2035.

managed landscaping limited to decorative trees, shrubs, and ground cover. Further, the Project Site is not located within or adjacent to a Very High Fire Hazard Severity Zone (VHFHSZ) as designated by CAL Fire's Fire and Resource Assessment Program.

While the Proposed Project would increase the density of the Project Site as compared with existing conditions, the Proposed Project would not result in a significant population increase, as described above. Additionally, the Proposed Project is required to incorporate safety and security features, including fire sprinklers, alarm systems, and adequate access for emergency vehicles, which must be reviewed and approved by the Sacramento Fire Department prior to issuance of a building permit. With review and approval of Project plans by the City's Fire Department, the Proposed Project would not adversely impact fire protection services in the City.

#### **Emergency Medical Services**

See the Health Care and Social Services discussion, above.

#### **References:**

California Department of Finance, Report E-5, City/County Population and Housing Estimates January 1, 2010-2020, May 2020.

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

City of Sacramento, Sacramento Police Department 2016 Annual Report, 2016.

City of Sacramento, 2035 General Plan.

# Parks, Open Space and Recreation

## (2) No impact anticipated

The Project Site is located immediately northeast of the Sam and Bonnie Pannell Meadowview Community Center. This community center, maintained by the City of Sacramento, includes amenities such as a 12-acre park, meeting rooms, multipurpose rooms, an auditorium, dance room, fitness/weight room, computer room, outdoor basketball courts and baseball diamonds, and a pool. The community center also provides free programs, such as monthly Friday activity nights for youth ages 13-19, flag football and basketball leagues, computer and smartphone assistance workshops, and after school youth and teen programs.

Because the Proposed Project would not result in substantial population growth, as discussed previously, the Project would not warrant construction of additional park space, nor would it result in substantial deterioration of any existing recreation facilities. Further, the City of Sacramento General Plan 2035

identifies a service level goal of 5 acres of neighborhood and community parks and other recreational facilities per 1,000 residents. To meet this goal, Policy ERC 2.2.5 of the 2035 General Plan states that the City shall require new residential development to meet its fair share of the park acreage service level goal by either dedicating land for new parks or paying a fair share of the costs for new parks and recreation facilities, or renovation of existing parks and recreation facilities. As such, the City of Sacramento implements a development impact fee program, through which it calculates fees based on a residential project's area that serve to offset the strain that a project would have on public services, facilities, and community amenities. However, Sacramento City Council approved Resolution No. 2018-0428 in October 2018, which reduces the existing development impact fees for new affordable dwelling units to a zero-dollar rate. As such, the Proposed Project would not be required to pay development impact fees related to parks and recreation.

Even though the Proposed Project would not contribute development impact fees to the Department of Parks and Recreation, the Project would include a picnic area, playground, and a 1,300-square-foot community center building, which would be shared by the residents of Coral Gables and Villa Jardin. With development of these on-site recreational assets, and the relatively small increase in population associated with the Project, the Project would not result in substantial adverse impacts to municipal parks and recreation resources. Therefore, the Project-related strain on public park and recreation resources would not result in adverse impacts to the existing municipal park system.

#### **References:**

City of Sacramento, Sam and Bonnie Pannell Community Center,

http://www.cityofsacramento.org/parksandrec/community-centers/sambonniepannellcenter, accessed January 14, 2020.

City of Sacramento, 2035 General Plan Education, Recreation, and Culture Element, March 2015.

City of Sacramento, Citywide Development Impact Fee Program.

Transportation and Accessibility

(2) No impact anticipated The Project would result in both short-term and long-term impacts to transportation and accessibility. For short-term impacts, Project construction would consist of demolition, grading, paving, construction, and painting. Project-related construction activities (and construction-related traffic) would occur during daylight hours on an intermittent basis, depending on the scope and intensity of the work taking place. While

construction traffic would temporarily affect traffic flow on the surrounding street network, particularly along the truck haul routes, the impacts would be temporary and would fluctuate in intensity throughout the construction day and vary throughout the overall construction program, with less traffic generated in phases following construction. Because the construction traffic impacts associated with the Proposed Project would be temporary and would largely occur during off-peak hours, they would not significantly affect the performance of the vehicular transportation network with respect to level of service standards or other metrics related to congestion and travel delay. Project-related long-term traffic impacts include the impact of resident, visitor, and delivery/service vehicles.

As of July 1, 2020, transportation impact assessments prepared in accordance with the California Environmental Quality Act are required analyze transportation impacts using vehicle miles traveled (VMT) as the primary measure of transportation impact. VMT is generally defined as the amount and the distance of automobile travel associated with a Project. While the City of Sacramento has not adopted guidelines to set new significance criteria for transportation impacts based on VMT for land use projects, the California Governor's Office of Planning and Research (OPR) published a technical advisory that includes recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures. The OPR technical advisory suggests that lead agencies may screen out VMT impacts using Project-specific characteristics, such as Project location, transit availability, and provision of affordable housing. Specifically, the OPR technical advisory states that affordable housing development in infill locations generally improves jobs-housing match and, in turn, shortens commutes and reduces VMT. Further, "low-wage workers in particular would be more likely to choose a residential location close to their workplace, if one is available" (OPR, Page 14). The OPR technical advisory states that a project consisting of a high percentage of affordable housing may be a basis for the lead agency to find a less than significant impact on VMT. Specifically, the guidance document states that "evidence supports a presumption of less than significant impact for a 100 percent affordable residential development (or the residential component of a mixed-use development) in infill locations" (OPR, page 15). Since the Proposed Project would involve development of 100 percent affordable residential units at Coral Gables, and because the Project Site is considered an infill location given the surrounding urban land uses, the Project can be presumed to have a less than significant traffic (VMT) impact.

Regarding public transportation, the Project Site's location affords multiple alternative transportation options, with sidewalks on the north and south sides of Meadowview Road, a

bus stop for Sacramento Regional Transit's (SRT) 56 line, located at the intersection of Meadowview Road and Coral Gables Court, and the Meadowview Blue Line light rail station one half mile east of the Project Site. The SRT 56 bus line connects to Kaiser and Methodist Hospitals southeast of the Project Site and the Pocket Transit Center west of the Project Site.

Therefore, the Project would not result in significant impact to transportation and mobility.

#### References:

Governor's Office of Planning and Research, Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018.

Sacramento Regional Transit, Transit Services Map, September 2019.

Environmental	Impact		
Assessment Factor Code		Impact Evaluation	
NATURAL FEATURES			
Unique Natural Features, Water Resources	(2) No impact anticipated	The Project Site is a flat, 2.32-acre group of parcels located in a highly urbanized area. The Project Site includes an existing 44-unit apartment complex containing 11 buildings and an L-shaped parking lot, as well as a 0.87-acre vacant lot characterized by turf grass, fencing, and scattered trees varying in species and condition. There are no surface water features, sole-source aquifers, or other water resources on or adjacent to the Project Site. Further, there are no unique geological features on or adjacent to the Project Site that are of special social/cultural, economic, educational, aesthetic, or scientific value.	
		As the Project Site is located in an urbanized area, it is not part of a contiguous natural area or wildlife corridor. While the northern portion of the Project Site is currently undeveloped, it has been disturbed by past uses and/or management and does not contain any native plant communities. Additionally, the Project Site does not contain any wetlands or riparian habitat as identified by the National Wetlands Inventory and the Project Site is located outside of the South Sacramento Habitat Conservation Plan area and areas identified by the County of Sacramento as potential mitigation areas for Swainson's hawk (an endangered species).  Therefore, because Project-related rehabilitation and construction activities would take place on a site that has been disturbed by past development and land management activities,	

and because the Project Site is located within a fully urbanized environment that is surrounded by disturbed areas (such as a sidewalks, residential buildings, public recreation facilities, streetlights, and major arterial streets), the Project would not impact any natural features, water resources, or geologic features. **References:** Sacramento County, South Sacramento Habitat Conservation Plan, Plan Area Map, 2019. Sacramento County, Swainson's Hawk Mitigation Areas Map, November 2005. U.S. Environmental Protection Agency, NEPA Assist Map, generated January 14, 2020. U.S. Fish and Wildlife Service, National Wetlands Inventory, accessed December 20, 2019. Vegetation, Wildlife (3) The Project Site is located in a fully urbanized area, surrounded Minor by existing multifamily development and municipal land uses (recreation and solid waste disposal), and contains an existing Adverse 44-unit apartment complex. The 0.87-acre vacant lot north of Impact – this existing apartment complex is characterized by trees of May varying species and condition and maintained turf grass. The require mitigation Project would not damage or destroy existing remnant or endemic plant communities, nor would it result in the disruption of wildlife, habitat alteration or removal, effects to rare species (including those that are considered threatened or endangered as described in the Endangered Species Section of this Environmental Assessment), or the proliferation of pest species. Due to the disturbed nature of the Project Site, the Site would not support special-status species listed by the USFWS, or species listed on the California Department of Fish and Wildlife's (CDFW) Special Animals and Plants Lists. There are a number of trees on the Project Site that vary in size, species, and health. These trees may provide nesting sites for migratory birds and raptors. Raptors (birds of prey), migratory birds, and other avian species are protected by state and federal laws, such as the federal Migratory Bird Treaty Act (MBTA) (42 USC Sections 703-712), which prohibits the killing, possessing, or trading of migratory birds except in accordance with regulations prescribed by the Secretary of Interior, as well as Section 3503.5 of the California Fish and Game Code, which states that it is "unlawful to take, possess, or destroy any birds in the order Falconiformes or Strigiformes 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." There are no known nests on the Project Site; however, there is potential for birds to nest in these trees in the

spring and summer. Therefore, impacts to nesting birds

	protected by the MBTA could occur if construction activities were to occur during nesting season (March 1 to August 31).
	While migratory bird species are considered highly mobile and would naturally avoid areas with loud construction noise, removal of active nests would result in the potential for minor impacts. Therefore, <b>Mitigation Measure WILD-1</b> , described below, would protect nesting birds during Project-related demolition and construction activities, and would ensure that the Project would be consistent with the Migratory Bird Treaty Act. With implementation of <b>Mitigation Measure WILD-1</b> , Project-related impacts on vegetation and wildlife species would be less than significant.
	Mitigation Measures:
	WILD-1: Migratory Bird Survey
	Tree removal should not occur during the local nesting season (February 1 to September 15 for nesting birds and February 1 to June 30 for nesting raptors), to the extent practicable. If any construction or tree removal occurs during the nesting season, a nesting bid survey shall be conducted by a qualified biologist prior to commencement of grading or removal of any trees on the property. If the biologist determines that nesting birds are present, restrictions will be placed on construction activities in the vicinity of the nest observed until the nest is no longer active, as determined by the biologist based on the location of the nest, type of the construction activities, the existing human activity in the vicinity of the nest, and the sensitivity of the nesting species. Grading and/or construction may resume in this area when a qualified biologist has determined that the nest is no longer occupied, and all juveniles have fledged.
	References:
	California Department of Fish and Wildlife, State and Federally Listed Endangered, Threatened, and Rare Plants of California, October 2019.
	California Department of Fish and Wildlife, Special Animals List, August 2019.
Other Factors	None Identified.

# **Additional Studies Performed:**

Michael Baker International:

- Michael Baker International, Villa Jardin and Coral Gables Project Air Quality Technical Memorandum, June 1, 2020.
- Michael Baker International, Villa Jardin and Coral Gables Project Noise Technical Memorandum, 2020.
- Michael Baker International, Cultural Resources Identification and Evaluation Report, January 21, 2020.

#### Professional Service Industries, Incorporated (PSI)

- PSI, Phase I Environmental Assessment, September 26, 2019.
- PSI, Revised Soil-Vapor Sampling and Analyses Report; Undeveloped Land [Coral Gables Property], January 28, 2020.
- PSI, Soil-Vapor Sampling and Analyses Report, Undeveloped Land [Coral Gables Property], April 16, 2020
- PSI, Limited Hazardous Materials Survey for Villa Jardin Apartments, October 8, 2019.

#### **Field Inspection** (Date and completed by):

Field inspections performed as part of the studies listed above are detailed within those studies.

#### **List of Sources, Agencies and Persons Consulted** [40 CFR 1508.9(b)]:

See list of references for each checklist section, above.

#### **List of Permits Obtained:**

Permits that are anticipated to be required include but are not limited to: building permits, air quality permit, driveway permit, and encroachment permit.

#### **Public Outreach** [24 CFR 50.23 & 58.43]:

Letters describing the Proposed Project and Project timeline and inviting recipients to share questions or schedule a telephone or video call were sent to neighbors of the Project Site on May 28, 2020, and to current tenants of the Villa Jardin Apartments on June 30, 2020. Emails describing the Proposed Project and timeline and inviting further comment were sent to Bless Child Community Association and the Meadowview Neighborhood Association on June 11, 2020. The development team anticipates hosting additional outreach meetings as the design process continues, when public health orders make it safe to do so.

Before finalizing the Project's Environmental Assessment, the SHRA will publicly disseminate/publish the Environmental Assessment's findings, as required by 24 CFR 58.43 and 24 CFR 58.70. The SHRA will consider the public comments received on any Project-related notices and, if appropriate, would make modifications in response to the comments.

#### **Cumulative Impact Analysis** [24 CFR 58.32]:

According to 24 CFR 58.32, a Responsible Agency must group together and evaluate as a single project all individual activities which are related either on a geographical or functional basis, or are logical parts of a composite of contemplated actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. There are no reasonably foreseeable projects within the immediate vicinity of the Project Site that would result in cumulatively considerable impacts.

The Proposed Project would involve rehabilitation of an existing 44-unit apartment complex and construction of 38 affordable housing units, a shared community building, and ancillary infrastructure (such as a surface parking lot and outdoor play equipment). The proposed new construction (Coral Gables component of the Project) would result in generation of noise and air pollutants. As stated above, the Project's construction- and operation-related noise would not generate noise levels that would exceed the City's noise standards at the closest sensitive receptors (the existing Villa Jardin apartments). With regard to air quality, the Proposed Project would not result in short- or long-term air quality impacts, as emissions would not exceed the SMAQMD adopted construction or operational thresholds. As evaluated above, the Proposed Project would not contribute a cumulatively considerable net increase of any nonattainment criteria pollutant and, therefore, the Project's incremental operational impacts would be less than cumulatively considerable. As such, the Project would not result in cumulatively considerable air quality or noise impacts.

Regarding potential transportation impacts, as discussed above, the OPR Technical Advisory states that "evidence supports a presumption of less than significant impact for a 100 percent affordable residential development (or the residential component of a mixed-use development) in infill locations." Since the Proposed Project would involve development of 100 percent affordable residential units at Coral Gables, and because the Project Site is considered an infill location given the surrounding urban land uses, the Project can be presumed to have a less than significant traffic (VMT) impact and would not contribute to a cumulative transportation impact.

Based on the analysis herein, the Project would not considerably contribute to any significant cumulative impacts resulting from successive projects of the same type in the same place over time.

#### **Alternatives** [24 CFR 58.40(e); 40 CFR 1508.9]

#### Alternate Site

Because portions of the Project would involve rehabilitation of the existing Villa Jardin apartment complex, it is not possible for the rehabilitation component of the Project to be conducted on another site. Further, the Coral Gables portion of the Project includes construction of a community center and outdoor recreation amenities, which would be shared with the Villa Jardin apartments to the south. The ability to use existing undeveloped land on the north side of the parcels containing the Villa Jardin apartments is integral to the Project's site design. Therefore, the Project is uniquely suited to the Project Site, and the Proposed Project is preferred over this alternative.

#### Alternate Design

Governor's Office of Planning and Research, Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018.

An alternative site design was considered for the Project, which placed the community center building on the western side of the Project Site, in the southwest corner of the 41 Coral Gables Court parcel. In this alternative, the community center would also have residential units on a second floor, with a community room and property management offices on the ground floor of the building. The second-floor units would not be as accessible for disabled persons, so these were removed from the community center building design. Further, placing the community center farther away from the terminus of Coral Gables Court would result in less outdoor activity around the driveway and along the sidewalks. The Proposed Project alternative places the community center and recreation uses near the terminus of Coral Gables Court for additional "eyes on the street," a concept popularized by Jane Jacobs in the 1960s, which essentially states that a populated street or park with a consistent presence of people will naturally draw the attention of people in the area. By placing a community gathering place near the Coral Gables Court sidewalk and driveway entrance, public safety would likely be greater given the greater number of people using the space and the greater attention it would create. Because the alternative would place the community center farther away from Coral Gables Court, the Proposed Project is preferred over this alternative.

#### **No Action Alternative** [24 CFR 58.40(e)]:

Under this alternative, the Coral Gables component of the Project would not be constructed and the Villa Jardin apartments restoration Project would not occur. As such, there would be no environmental impacts. However, the Project Site would remain as a partially developed R-3 property zoned for residential development. Over time, it is possible that the vacant parcels that make up the Coral Gables portion of the Project Site would be sold to another developer and developed with market-rate housing. Further, the Villa Jardin apartments would continue to deteriorate due to normal wear and tear on the buildings and appurtenances and would not be updated. Since rehabilitation activities would include energy-efficient upgrades, such as new front entry doors, new roofs, new air conditioning units, and new double-pane windows, the no-action alternative would result in greater long-term energy consumption as the apartments would continue to use older and less efficient air conditioning units and would have less energy-efficient windows and doors. As discussed in the Statement of Purpose and Need for the Proposal Section, above, the SHRA has documented a persistent demand for affordable housing for low- and moderate-income households. The no-action alternative would not result in the beneficial effects associated with constructing affordable housing units. Therefore, the Project is preferred over this alternative.

#### **Summary of Findings and Conclusions:**

After implementation of the mitigation measures included in this assessment, as well as compliance with the federal, state, and local regulations discussed throughout this assessment, the Project would not negatively impact the surrounding environment and would not have an adverse environmental or health effect on end users. The project complies with NEPA and other related federal and state environmental laws.

# Mitigation Measures and Conditions [40 CFR 1505.2(c)]

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	CUL-1: Treatment of previously unidentified archaeological deposits.  If suspected prehistoric or historical archaeological deposits are discovered during construction, all work within 25 feet of the discovery shall be redirected and a Secretary of the Interior Professionally Qualified archaeologist and/or Registered Professional Archaeologist shall assess the situation and make recommendations regarding the treatment of the discovery. Impacts to significant archaeological deposits should be avoided if feasible, but if such impacts cannot be avoided, the deposits shall be evaluated for their eligibility for the California Register of Historical Resources. If the deposits are not California Register eligible, no further protection of the find is necessary. If the deposits are California Register eligible, impacts shall be avoided or mitigated. Acceptable mitigation may consist of but is not necessarily limited to systematic recovery and analysis of archaeological deposits, recording the resource, preparation of a report of findings, and accessioning recovered archaeological materials at an appropriate curation facility.
	CUL-2: Treatment of previously unidentified human remains.  Any human remains encountered during project ground-disturbing activities shall be treated in accordance with California Health and Safety Code Section 7050.5. There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the County coroner has determined the manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation or to his or her authorized representative. Project personnel/construction workers shall not collect or move any human remains and associated materials. If the human remains are of Native American origin, the coroner must notify the Native American

	Heritage Commission (NAHC) within 24 hours of this identification. The NAHC will immediately identify a Native American most likely descendant to inspect the site and provide recommendations within 48 hours for the proper treatment of the remains and associated grave goods.
Vegetation, Wildlife	WILD-1: Migratory Bird Survey
	Tree removal should not occur during the local nesting season (February 1 to September 15 for nesting birds and February 1 to June 30 for nesting raptors), to the extent practicable. If any construction or tree removal occurs during the nesting season, a nesting bid survey shall be conducted by a qualified biologist prior to commencement of grading or removal of any trees on the property. If the biologist determines that nesting birds are present, restrictions will be placed on construction activities in the vicinity of the nest observed until the nest is no longer active, as determined by the biologist based on the location of the nest, type of the construction activities, the existing human activity in the vicinity of the nest, and the sensitivity of the nesting species. Grading and/or construction may resume in this area when a qualified biologist has determined that the nest is no longer occupied, and all juveniles have fledged.
The project will not result in a signific	npact [24 CFR 58.40(g)(1); 40 CFR 1508.27] cant impact on the quality of the human environment. ct [24 CFR 58.40(g)(2); 40 CFR 1508.27] the quality of the human environment.
Preparer Signature:	Date:

Name/Title/Organization:

Certifying Officer Signature: \_\_\_\_\_\_Date:\_\_\_\_\_

Name/Title:

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).