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

Project Information

Project Name: Sage at Folsom (Scholar Way Senior Apartment Community) Project

Responsible Entity: Sacramento Housing and Redevelopment Agency

Preparer: Michael Baker International, Incorporated

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

Consultant (if applicable): Michael Baker International, Incorporated

Direct Comments to: Stephanie Green, Environmental Coordinator, Sacramento Housing and Redevelopment Agency
sgreen@shra.org
916-440-1302
Project Location:

The Project Site is comprised of approximately 4.2 acres of undeveloped, previously disturbed land located immediately east of the intersection of Scholar Way and East Bidwell Street in the City of Folsom in Sacramento County, California. The address for the Project Site is 89 Scholar Way, Folsom, California, Sacramento County (Assessor Parcel Number [APN] 072-0270-157).

The Project Site is surrounded by Scholar Way, College Point Business Park, and Folsom Lake College to the north; the Church of Jesus Christ of Latter-Day Saints (church), Cavitt Drive, and a residential neighborhood to the east; the Broadstone Marketplace commercial center to the south; and Southern Pacific Railroad/Placerville & Sacramento Valley Railroad track, bike trail, and East Bidwell Street to the west.

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

The Sacramento Housing and Redevelopment Agency (SHRA) is proposing to use HUD HOME Investment Partnership funds to support construction of the Sage at Folsom project (Project), which would consist of the construction of 109 one-bedroom/one-bathroom units of affordable housing for seniors with one additional unit reserved for management staff (for a Project total of 110 units). The Project would comprise two buildings, referred to herein as the North Building (i.e., building nearest to Scholar Way) and the South Building (i.e., the building nearest to the Broadstone Marketplace commercial center to the south), which would be connected by an open-air bridge connecting the second and third floors of each building. The Project would include indoor and outdoor community amenities, as well as a surface parking lot on the northern, eastern, and southern portions of the Project Site. The proposed development area has been previously disturbed/graded and consists of a flat area elevated above Scholar Way and East Bidwell Street. A Regional Location Map and a Project Location Map are provided in Figure 1 and Figure 2, respectively. As shown in Figure 2, the Project Site is a flag lot, which is rectangularly shaped along East Bidwell Street but has a small strip of land that extends to Cavitt Drive to the east.

Proposed Structures

The Project would consist of a total of 110 units, including one unit for use by the property manager and 109 units for low- and very low-income senior households. The units would be split between two three-story structures, which would be connected by an open-air bridge on the second and third floors. All 110 units would include one bedroom and one bathroom and would range in size from 530 square feet to 574 square feet. Each unit would include a full kitchen, living space, and storage closet; 22 of the units would include balconies ranging from 40 square feet to 55 square feet. Units with balconies would be limited to the second and third floors of the two proposed structures. The two buildings would each range in height from 36 feet to 41 feet and would include rooftop-mounted mechanical equipment and photovoltaic panels (approximately 199 kilowatts). The equipment and photovoltaic panels would be screened from view by a decorative parapet. A detailed site plan of the Project is provided in Figure 3 with conceptual renderings of the Project illustrated in Figure 4 and Figure 5.

The Project would include indoor community amenities, such as a community room on the first floor of the proposed structure and on-site laundry facilities, as well as outdoor amenities, such as a courtyard, garden, and bocce ball court. The first floor community room would be approximately 2,601 square feet and would include a great room with television, game, and lounge areas; a business center; and kitchen. Other amenities would include a community laundry room, lobby with mail room, and an outdoor patio with seating areas, umbrellas, patio tables, and a barbecue area. These amenities would be located on the first floor of the North Building, with the outdoor patio area located on the east side of the building, facing the proposed surface parking area and the church to the east. Other outdoor amenities would be located on the east side of the South Building, including a bocce ball court, a dog park with synthetic turf, and a community garden. A walking path would be located along the western, northern, and southern frontages of both
buildings, which would connect to the parking area and lobby by passing under the bridge between the two proposed buildings. As shown in Figure 3, this walking path would connect to the parking areas on the northern and southern portions of the Project Site. Pedestrian ramps would connect these parking areas to the sidewalk located on Scholar Way to the north and to the Broadstone Marketplace commercial center immediately to the south, as also shown in Figure 3.

As shown in the conceptual Project renderings in Figure 4 and Figure 5, the proposed structures would include articulated frontages with a mix of materials, including stone accents, fiberboard panels and siding, and metal accents on the second and third floor balconies, as well as on the bridge connecting the two structures. The articulated building elevations, varying building heights, and mix of materials add visual interest to each building elevation. These materials are designed to be consistent with the City’s Design Guidelines for Multi-family Development. The North Building would be L-shaped and would include community amenities, such as the community room, lobby, mail room, and office on the first floor and laundry on all three floors. The North Building would contain 57 units, while the South Building, which is rectangular in shape, would contain 53 units.

Parking and Circulation

Primary vehicle access to the Project Site would be from an existing driveway on Cavitt Drive. This driveway currently provides access to the existing church to the east. The Project would reconfigure this driveway to provide access to both the church property and the Project Site. The new driveway entrance would include a circular, stamped concrete divider and a monument sign for the Project. The entrance to the church would be gated, but access to the Project Site would be open. The driveway would be extended from Cavitt Drive along the south side of the church property to provide access to the Project Site and would be 24 feet wide. Secondary vehicle access to the Project Site would be available from Scholar Way through a right-turn, inbound-only driveway from Scholar Way on the northern portion of the Project Site.

The Project would include 115 parking spaces, which would be located within three parking areas on the northern, southern, and eastern portions of the Project Site. Included in this parking total would be 12 parking spaces compliant with the Americans with Disabilities Act (ADA) and 12 electric vehicle reserved spaces, with 6 of these spaces equipped with electrical charging infrastructure. Additionally, the Project would provide three bike racks with space to accommodate 24 bicycles. The racks would be located in the loading zone between the two structures (accommodating 10 bicycles), on the east side of the North Building near the patio (accommodating 6 bicycles), and on the south side of the South Building near the dog park (accommodating 8 bicycles).

Landscaping and Lighting

As shown in the Project’s Landscape Plan presented in Figure 6, decorative trees, shrubs, and groundcover would be utilized throughout the Project Site. Specifically, large shade trees (e.g., tulip tree or common olive) and smaller decorative trees (e.g., weeping bottlebrush or sweet gum), along with shrubs and decorative ground cover (e.g., blue fescue or emerald carpet manzanita), would be located along the entire southern edge of the Project Site, extending from Cavitt Drive along the main driveway to the Project Site's western boundary with the existing bicycle trail along East Bidwell Street. An existing bioswale located between the proposed surface parking lot and the existing church property would remain in place, with approximately 18 additional trees and a row of screening shrubs planted along the Project Site’s eastern boundary. The two proposed buildings would be surrounded by decorative shrubs and groundcover, as well as small trees, with additional trees planted near the bocce ball court, barbeque and patio area, and the dog park. The steep slope located on the western side of the Project Site would be planted with groundcover, stabilizing/decorative shrubs, and approximately 13 shade trees. Monument signs would be located at the primary entrance off of Cavitt Drive and at the secondary entrance from Scholar Way. Both monument signs would be surrounded by decorative shrubs and groundcover.
Overhead lighting would be installed along the driveway that extends to the proposed parking areas from Cavitt Drive, as well as in the proposed surface parking lots. Additional lighting would be placed along walkways, on the sides of the buildings, and at building entrances to promote safety and provide aesthetic benefits.

**Walls and Fences**

The Project would include a 42-inch-tall tubular steel fence that would be placed west of the walking trail on the west side of the proposed buildings. This fence would be located at the top of the slope that extends from the proposed development area down to the existing bicycle path, railroad track, and East Bidwell Street to the west. An existing fence made of masonry pillars and vertical steel tubes located along the Project Site’s southern boundary with the commercial center to the south would remain in place, with the exception of an opening for a pedestrian ramp to access the commercial uses south of the Project Site. The Project would include placement of a 24-inch-tall post and cable fence located between the proposed parking area and the existing bioswale. A 6-foot masonry wall would be located along the Project Site’s boundary with the existing church property to the east. This masonry wall would extend from the church and Project’s shared entrance from Cavitt Drive along the northern side of the Project driveway, then would turn north and run between the bioswale and the church’s surface parking lot. The masonry wall would terminate approximately 50 feet from Scholar Way.

**Construction**

Project construction and grading would occur in one phase and would take approximately 14 months to complete. The Project Site has been previously disturbed by grading and is characterized by an elevated flat area and steep slopes leading down to Scholar Way and East Bidwell Street. Grading would involve approximately 6,673 cubic yards of cut and 992 cubic yards of fill, which would result in approximately 5,681 cubic yards of soil export.

**Approvals**

An Initial Study and Mitigated Negative Declaration (IS/MND) was prepared for this Project pursuant to the California Environmental Quality Act (CEQA). The IS/MND, along with a mitigation monitoring and reporting program developed for the Project, was approved by the City of Folsom Planning Commission on November 18, 2020. A Notice of Determination was filed with the Sacramento County Clerk on November 19, 2020. City approvals required for the Proposed Project include a Planned Development Permit for the 110-unit residential development within an R-4 PD Zone (zoning is discussed in the Existing Conditions and Trends section, below).
Aerial View of the Project

View of Proposed Community Center Area

Source: Kuchman Architects PC and USA Properties Fund, September 2020
FIGURE 6
Landscape Plan

Source: Wilson Design Studio, September 2020
Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:

The 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 2018 SHRA Annual Report, is to “develop, preserve, and finance a continuum of affordable housing opportunities for Sacramento City and County residents.”¹ The Proposed Project contributes toward this goal by constructing new affordable housing, which would provide low- and very low-income housing opportunities for seniors living in the City of Folsom (City) and Sacramento County who do not have incomes or financial means to afford conventional, market-rate residential units.

A goal of the City of Folsom’s General Plan Housing Element (2013) is to facilitate affordable housing opportunities to serve the needs of people living and working in the community. Specifically, Policy H-3.6 of the General Plan Housing Element states that the City will support SHRA efforts to maintain existing levels of Housing and Urban Development (HUD) assistance available to extremely low-, very low-, and low-income residents of the City. Other policies included in the Housing Element provide incentives to encourage development of affordable housing and senior housing projects. Further, the Housing Element states that between 2006 and 2010, 37 percent of senior-owned households and 76 percent of senior-rented households had a housing cost burden greater than 30 percent, meaning that these households were spending more than 30 percent of their monthly budgets on housing.² By providing affordable housing for seniors, the Project is addressing the need for affordable senior housing as identified in the City’s General Plan.

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

As stated above, the Project Site is comprised of approximately 4.2 acres of undeveloped land located immediately east of the intersection of Scholar Way and East Bidwell Street in the City of Folsom in Sacramento County, California. The address for the Project Site is 89 Scholar Way, Folsom, California, which is shared with the church to the east. This is because the church property and the Project Site were part of the same parcel until the parcel was subdivided into two parcels in 2019. The Project Site has been previously disturbed and is characterized by a large, flat graded area with a moderately steep slope extending from the graded area down to East Bidwell Street on the western edge of the Project Site. An existing bioswale is located along the eastern boundary of the Project Site, between the relatively flat, graded area and the existing church to the east. The Project Site is currently characterized by ruderal plants, grasses, and sporadically placed trees and shrubs varying in size, species, and health. The Project Site’s Scholar Way frontage is improved with a sidewalk and includes a bus stop (with no bench or shelter) for Sacramento Regional Transit’s Route 10 (the Folsom Stage Line). The Project Site generally slopes to the southwest with the driveway entrance from Cavitt Drive being elevated approximately 20 feet above the flat area where the proposed buildings would be constructed. This flat proposed development area is at the same grade as Scholar Way at the northeastern corner of the Project Site and elevated approximately 20 feet above East Bidwell Street along the western boundary of the Project Site. Therefore, the southeastern corner of the Project Site is elevated approximately 40 feet above the southwestern corner of the Project Site.

The Project Site is located within the Broadstone Unit No. 3 Specific Plan area (SP 95-1), which includes approximately 570 acres of land that is bounded by East Bidwell Street to the east; the Empire Ranch Specific Plan area to the west; Folsom Lake College to the north; and U.S. Highway 50 (US 50) to the south. The Project Site is zoned R-4 PD SP 95-1, with R-4 PD referencing the Project Site’s General Apartment Planned Development District zoning designation and SP 95-1 referencing its location within the specific plan area.

The Project Site has a General Plan land use designation of Multifamily High Density (MHD) and is located within the East Bidwell Corridor overlay zone. This overlay zone allows properties along East Bidwell

² City of Folsom, General Plan Housing Element, October 2013.

[11]
Street the flexibility to be developed as mixed use, providing for a mixture of commercial and residential uses that are mutually compatible. The designation allows for multifamily housing, as well as shops, restaurants, services, offices, and other compatible uses. The East Bidwell Corridor overlay zone extends from US 50 to the southern edge of the City’s downtown historic district to the north and includes properties on both sides of East Bidwell Street.

**Funding Information**

The Proposed Project would be funded, in part, through the HUD HOME Investment Partnership program (HOME funds).

<table>
<thead>
<tr>
<th>Grant Number</th>
<th>HUD Program</th>
<th>Funding Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>M16DC060211</td>
<td>HOME Investment Partnership</td>
<td>$800,000</td>
</tr>
<tr>
<td>M17DC060211</td>
<td>HOME Investment Partnership</td>
<td>$800,000</td>
</tr>
<tr>
<td>M18DC060211</td>
<td>HOME Investment Partnership</td>
<td>$800,000</td>
</tr>
</tbody>
</table>

**Estimated Total HUD Funded Amount:** $800,000

**Estimated Total Project Cost** (HUD and non-HUD funds) [24 CFR 58.32(d)]: $31,212,943

Breakdown of Sources of Funding:

<table>
<thead>
<tr>
<th>Source of Funding</th>
<th>HUD Funding (Yes/No)</th>
<th>Funding Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Federal Tax Credit Equity</td>
<td>No</td>
<td>$10,117,512</td>
</tr>
<tr>
<td>Senior Loan</td>
<td>No</td>
<td>$12,750,000</td>
</tr>
<tr>
<td>NOI During Construction</td>
<td>No</td>
<td>$729,897</td>
</tr>
<tr>
<td>SHRA Loan (HOME Investment Partnership funding)</td>
<td>Yes</td>
<td>$800,000</td>
</tr>
<tr>
<td>Deferred Developer Fee</td>
<td>No</td>
<td>$2,315,534</td>
</tr>
<tr>
<td>City of Folsom</td>
<td>No</td>
<td>$4,500,000</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td></td>
<td><strong>$31,212,943</strong></td>
</tr>
</tbody>
</table>
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.

<table>
<thead>
<tr>
<th>Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6</th>
<th>Are formal compliance steps or mitigation required?</th>
<th>Compliance determinations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Airport Hazards 24 CFR Part 51 Subpart D</td>
<td>Yes No □ ☒</td>
<td>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 residents. The closest military airport to the Project Site is the Coast Guard Air Station Sacramento at McClellan Airfield, approximately 14.5 miles (76,560 feet) west of the Project Site. The closest civilian airport is the Cameron Airpark, approximately 7.8 miles (41,184 feet) east of the Project Site. The Project Site is greater than 15,000 feet from a military airport and greater than 2,500 feet from a civilian airport. Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary. References: Attached map showing location of McClellan Airfield and Cameron 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 December 10, 2020.</td>
</tr>
<tr>
<td>Coastal Barrier Resources</td>
<td>Yes No □ ☒</td>
<td>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 (USFWS) within the State of California.</td>
</tr>
</tbody>
</table>
Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]

Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary.

**References:**

<table>
<thead>
<tr>
<th><strong>Flood Insurance</strong></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

The Project would involve construction of new affordable senior housing and ancillary community amenities in the City of Folsom. 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 hazard.” As such, the Project does not require flood insurance. Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary.

**References:**
FEMA, Flood Insurance Rate Map (FIRM) 06067C0117H.

**STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5**

<table>
<thead>
<tr>
<th><strong>Clean Air</strong></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Clean Air Act, as amended, particularly section 176(c) &amp; (d); 40 CFR Parts 6, 51, 93</td>
<td>☑</td>
<td>☐</td>
</tr>
</tbody>
</table>

The analysis in this section is informed, in part, by the Air Quality Analysis prepared for the Project by Helix Environmental Planning, Inc. (Helix) in October 2020. This technical analysis was reviewed and found sufficient for addressing HUD’s Clean Air Act consistency thresholds by Michael Baker International, as discussed in the Air Quality Technical Memorandum prepared for the Project (Michael Baker International 2020). The Air Quality Analysis and the Air Quality Technical Memorandum are available in the Environmental Review Record.

To demonstrate consistency with HUD guidance on air quality, HUD requires that the Environmental Review Record contain one of the following:

- 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;
- Documentation that the project’s county or air quality management district is not in nonattainment or maintenance status for any criteria pollutants;
- Evidence that estimated emissions levels for the project do not exceed de minimis emissions levels for the nonattainment or maintenance level pollutants; or
- A determination that the project can be brought into compliance with the State Implementation Plan (SIP) through modification
or mitigation, including documentation on how the project can be brought into compliance.

The Project Site is located in the Sacramento Valley Air Basin (SVAB). The SVAB is designated as a moderate nonattainment area for ozone \((O_3)\), moderate maintenance area for particulate matter 10 microns in diameter or less \((PM_{10})\), and moderate nonattainment area for fine particulate matter \((PM_{2.5})\). It should be noted that volatile organic compounds \((VOCs)\) and nitrogen oxides \((NO_X)\) are \(O_3\) precursors (i.e., \(NO_X\) and \(VOCs\) react with sunlight to form \(O_3\) [photochemical smog]). Per guidelines set forth by HUD, while the SVAB is in nonattainment for \(O_3\) and \(PM_{2.5}\), the project would be in compliance with the Clean Air Act if the project’s estimated emissions levels are below de minimis levels for all nonattainment or maintenance pollutants.

In the past, the U.S. Environmental Protection Agency (USEPA) has required that an action’s annual emissions be 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. As shown in Table 1, below, Project-generated maximum annual construction and operational emissions combined would not exceed the de minimis levels established within 40 CFR Section 93.153.

Table 1: Project Annual Emissions

<table>
<thead>
<tr>
<th>Annual Emissions</th>
<th>Pollutant (tons/year)¹</th>
<th>VOCs</th>
<th>NO_X</th>
<th>PM_{10}</th>
<th>PM_{2.5}</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project Emissions (construction and operation)</td>
<td>0.938</td>
<td>2.2709</td>
<td>0.5894</td>
<td>0.2165</td>
<td></td>
</tr>
<tr>
<td>De Minimis Threshold</td>
<td>50</td>
<td>50</td>
<td>100</td>
<td>100</td>
<td></td>
</tr>
<tr>
<td><strong>Is Threshold Exceeded?</strong></td>
<td><strong>No</strong></td>
<td><strong>No</strong></td>
<td><strong>No</strong></td>
<td><strong>No</strong></td>
<td></td>
</tr>
</tbody>
</table>

Notes:
1. Emissions were calculated using CalEEMod, version 2016.3.2.
2. Project emissions include annual construction and operational emissions. Refer to the IS/MND Section III, Air Quality, and Appendix B, Air Quality Modeling Results and GHG Strategy Consistency Checklist.

Source: Helix Environmental Planning, Inc., Scholar Way Senior Apartment Community Initial Study and Mitigated Negative Declaration, October 2020.
Because no adverse effects would result from the Project, and because the Project would be consistent with HUD’s guidance on air quality, there are no formal compliance steps or mitigation required and no further analysis is necessary.

**References:**

United States Environmental Protection Agency, *Revisions to the General Conformity Regulations*, March 24, 2010,


<table>
<thead>
<tr>
<th>Coastal Zone Management</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Coastal Zone Management Act, sections 307(c) &amp; (d)</td>
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</tbody>
</table>

The Project does not require state review under the Coastal Zone Management Act as the City of Folsom is not within the California Coastal Commission’s jurisdiction. Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary.

**References:**


<table>
<thead>
<tr>
<th>Contamination and Toxic Substances</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>24 CFR Part 50.3(i) &amp; 58.5(i)(2)</td>
<td>☒</td>
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</tbody>
</table>

The analysis contained in this section is partially informed by the Phase I Environmental Site Assessment (ESA) completed for the Project by Essel Environmental Engineering and Consulting in May 2018.

The Project Site is currently undeveloped and is characterized by ruderal plants and grasses with scattered trees and shrubs. A rock-lined drainage swale is located on the eastern property line separating the Project Site from the surface parking lot of the church to the east. As described in the *Existing Conditions and Trends* section, above, the southwestern edge of the Project Site has a significant downward slope to a Class I bike path, railroad track, and East Bidwell Street. This steep downward slope is associated with grading of a level building pad on the Project Site, which was done in the early 2000s.

**Site History and Past Uses**

The Phase I ESA conducted for the Project indicated that the topographic maps and aerial photographs extending back to 1891 showed that the Project Site has never been developed. The elevated building pad was graded on the Project Site between 2006 and 2009. Aerial photography showed that the railroad track along the western boundary of the Project Site has been in place since at least 1937, with historical topographic maps showing the railroad track in its current location as early as 1891. East Bidwell Street was not depicted until 1941 in topographic maps reviewed as part of the Phase I ESA. Scholar Way and portions of Folsom Lake College north of the Project Site are visible in aerial photography beginning in 1993. The church property located
immediately east of the Project Site was visible in aerial photography beginning in 2009, around the same time that the graded building pad was visible on the Project Site. In short, with available records extending back to 1891, the Project Site was consistently observed as undeveloped, uncultivated land. As such, there are no significant environmental concerns associated with past use by industrial, agricultural, or other uses that would result in site contamination.

**State and Federal Hazard Materials Database Results**

The Phase I ESA completed for the Project included a review of state and federal regulatory agency database for activities that may present environmental concerns in the general vicinity of the Project Site. Further, the Phase I ESA included a review of historical auto and dry-cleaning commercial uses, which would pose a contamination threat. This database review included Sacramento County Environmental Management Department records, City of Folsom Fire Department, Sacramento Metropolitan Air Quality Management District (SMAQMD), Sacramento Regional County Sanitation District, State Water Resources Control Board (SWRCB), California Department of Toxic Substances Control (DTSC), and California Environmental Protection Agency (CalEPA).

As stated in the Phase I ESA, chemical releases (particularly petroleum-product releases) often result in only local impacts to soil and groundwater. The lateral migration of these contaminants in either liquid or vapor phases in soil or dissolved in the groundwater may extend several tens to a few hundred feet from the release point, depending on the magnitude of the release. Therefore, chemical releases at locations that are within one-eighth mile (660 feet) of a property, particularly locations that are upgradient with respect to the direction of groundwater flow (i.e., northeast of the Project Site), are considered to have a higher potential to impact that property, whereas more distant properties have less potential for such impact. The Phase I ESA indicated that the above-mentioned databases returned nine entries for facilities located within one-eighth mile of the Project Site. The closest facility was the church property immediately east of the Project Site, which was listed on the California Integrated Water Quality System (CIWQS) database. The CIWQS is a computer system utilized by SWRCB and Regional Water Quality Control Board (RWQCB) to track information about places of environmental interest, manage permits and other orders, track inspections, and manage violations and enforcement activities. Based on information in the CIWQS database, the church facility had a stormwater management permit during its construction. No enforcement actions were documented, and there was no evidence of hazard material usage, which would represent an environmental concern to the Project Site. Further, there were no hazardous cleanup sites identified on or within one-eighth mile of the Project Site on the SWRCB’s GeoTracker database. The EnviroStor database, maintained by California DTSC, did not identify the Project Site or any site within
one-eighth mile of the Project Site as a hazardous cleanup site. The USEPA’s Resource Conservation and Recovery Act (RCRA) database identified several hazardous materials handlers and waste generators in close proximity (south and west) to the Project Site; however, these were small generators and handlers of hazardous waste and included commercial uses that are commonly found in urban environments, such as home improvement stores, pharmacies, and photo processing businesses. The database listings for these uses did not indicate that any releases of hazardous materials have occurred that could affect future residents of the Project Site.

**Radon**

The USEPA assigns each county in the United States a zone (1, 2, or 3) based on radon potential. Zone 1 counties are areas where the average predicted indoor radon concentration in commercial dwellings exceeds the USEPA Action Limit of 4.0 picoCuries per liter (pCi/L). In Zone 2 and 3 counties, average predicted concentrations are less than the Action Limit. The USEPA has found elevated levels of radon in homes in all three zones and recommends site-specific testing to determine radon levels at a particular location.

According to the USEPA Map of Radon Zones, the Project Site is located in Zone 3, where average predicted radon levels are less than 2.0 pCi/L. In 51 State radon tests conducted in the Project Site’s zip code of 95630, six (12 percent) documented radon concentrations exceeding 4 pCi/L. Therefore, the Phase I ESA recommends that site-specific radon testing be performed prior to construction. **Mitigation Measure CON-01** would require site-specific radon testing to be performed on the Project Site prior to Project occupancy to confirm that radon levels on-site are at acceptable levels for on-site habitation. This mitigation measure is included below.

**Mitigation Measure CON-01**: Prior to the first occupancy permit, the Project applicant shall conduct site-specific radon testing to confirm that radon levels on-site are at acceptable levels for habitation on-site. Should results of the radon testing indicate that radon levels exceed State standards for habitation, the Project applicant shall follow recommended remediation procedures per the testing report prior to issuance of an occupancy permit by the City. Results from this testing shall be submitted to the City of Folsom and SHRA. A Radon Professional may conclude that testing or mitigation is not necessary based on exemptions laid out in the relevant state or ANSI-AARST radon standard. Any such justifications as to why testing or mitigation is not necessary must be provided in the Environmental Report in the form of a signed letter from the radon professional that references the appropriate standard.
With incorporation of this mitigation measure, ensuring that radon levels on the Project Site would be within safe levels for habitation, the Project Site would not have any environmental conditions of concern that would preclude the development of residential uses on the Project Site.

**References:**


California State Water Resources Control Board, Geotracker Map (LUST and Clean Up Program; Permitted USTs), generated December 11, 2020.

City of Folsom, Conditions of Approval for the Scholar Way Senior Housing Project (PN 19-284) Planned Development Permit, Planning Commission, November 18, 2020.


### Table: Endangered Species

<table>
<thead>
<tr>
<th>Endangered Species</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</strong></td>
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</table>

According to HUD Guidance, an Environmental Assessment must “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 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 USFWS identifies the giant garter snake (threatened), California red-legged frog (threatened), California tiger salamander (threatened), Delta smelt (threatened), valley elderberry longhorn beetle (threatened), vernal pool fairy shrimp (threatened), conservancy fairy shrimp (endangered), and vernal pool tadpole shrimp (endangered) 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 2020). The IPaC report also identifies several endangered flowering plants, including El Dorado bedstraw, Pine Hill ceanothus, Pine Hill flannelbush, Sacramento Orcutt grass, and Stebbins’ morning glory, as well as one threatened species (Layne’s butterweed), as being present in the vicinity of the Project Site. However, the IPaC report did not find any critical habitat within the Project Site.

The giant garter snake is a threatened species that inhabits agricultural wetlands and other waterways. Further, amphibians, fish, and
crustaceans all require consistent 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 or running water, the Project Site would not be a viable habitat for any of these threatened or endangered species. With regard to special-status plant species, the Project Site is a rough graded pad that lacks vernal pools or other wetland habitats, with the exception of the constructed stormwater bioswale, and the soil has been too disturbed to support special-status plant species. The constructed swale is highly disturbed and does not appear to hold water for any significant duration and would, therefore, not be suitable habitat for protected plant species that require nearly permanent water.

Further, the Project Site is located approximately 2.7 miles north of the South Sacramento Habitat Conservation Plan area (the northern boundary of which is White Rock Road, south of US 50) and areas identified by the County of Sacramento as potential mitigation areas for Swainson’s hawk (an endangered species).

Two site reconnaissance surveys were conducted by Helix, on June 17, 2020, and October 20, 2020, which assessed the Project Site for plant communities, habitat types, aquatic resources, wildlife and the Project Site’s potential to support special-status species or sensitive natural communities. No special-status species were identified during these surveys. The results of these surveys are discussed below.

**Biological Resource Surveys**

The June and October 2020 biological resources surveys conducted by Helix determined that the Project Site consists of ruderal/disturbed habitat as a result of the Project Site’s history of grading. Project Site vegetation was observed to include annual grasses and other weedy species, including medusa head, wild oats, soft chess, Italian ryegrass, and fescue, as well as common forbs, such as rose clover, vetch, prickly lettuce, and yellow star thistle.

A constructed bioswale is located between the Project Site and the church to the east. The southern portion of the swale is rock lined, while the remainder of the swale has earthen bed and banks. Runoff from the church property is conveyed to the bioswale, which drains to the northwest and into a storm drain inlet at Scholar Way. The swale contains a mix of species associated with the landscaping from the church, as well as some native and non-native wetland species, including dallis grass, pampas grass, narrow leaved cattail, bulrush, and wild rose.

As stated in the Description of the Proposed Project, above, a number of trees are located throughout the Project Site. The surveys of the Project Site found approximately eight trees located on the southern boundary of the Project Site along the existing masonry wall and fence. These trees are common trees in the urban environment (Fremont cottonwoods, arroyo willows, black willow, and an almond tree) and were found to be in fair condition with evidence of deferred maintenance. None of these trees would be considered “protected” by the City of Folsom’s Tree Preservation Ordinance (Chapter 12.16 of the Folsom Municipal Code).
which protects native oak trees, street trees, and landmark trees from removal, pruning, or encroachment.

No special-status species were observed on the Project Site during the biological reconnaissance. Several birds were observed during the surveys; however, these birds, which included California scrub jay, mourning dove, western kingbird, and black phoebe, are common in urban environments and would be highly tolerant of human presence.

**Jurisdictional Waters**

There are no waters of the U.S. on the Project Site. The Navigable Waters Protection Rule: Definition of “Waters of the United States” (33 CFR Part 328) exempts stormwater control features constructed or excavated in upland or in non-jurisdictional waters to convey, treat, infiltrate, or store stormwater runoff from the provisions of the Clean Water Act. The vegetated bioswale located along the eastern boundary of the Project Site, between the proposed surface parking lot and the existing church property, was constructed in fill soils associated with development of the church. Therefore, it is considered exempt from the provisions of the Clean Water Act.

There is also a small depression on the northeastern side of the Project Site that contains some wetland vegetation and likely holds water periodically during the wet season. This depression drains to the bioswale along the eastern boundary of the Project Site via a 2-foot-wide constructed outfall. This depression is a remnant of the construction activities and is likely a borrow pit associated with the mass grading of the church property, as well as the Project Site. The final rule for waters of the U.S. also excludes water-filled depressions constructed or excavated in upland or in non-jurisdictional waters incidental to mining or construction activity, and pits excavated in upland or in non-jurisdictional waters for the purpose of obtaining fill, sand, or gravel. The depression with wetland vegetation and the associated outfall was constructed or excavated in uplands incidental to construction activity and/or for the purpose of obtaining borrow material. Therefore, both the constructed vegetated swale and the depression are exempt from the provisions of the Clean Water Act and do not qualify as waters of the U.S.

**Conclusions**

Project-related grading and construction activities would take place on a site that has been previously disturbed by past construction and is completely surrounded by existing urban land uses. Because the Project Site is located within a fully developed environment that is surrounded by disturbed areas (such as a sidewalk, major roadways, commercial land uses, an existing church, and institutional land uses), implementation of the Project would not result in the loss of habitat utilized by any of the endangered or threatened species identified above. Additionally, no special-status species were observed during Project Site surveys completed in summer and fall 2020.
None of the special-status plant species or special-status animal species identified above have the potential of occurring on the Project Site due to lack of suitable habitat, given the Project Site’s history of ground disturbance.

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 Bird Treaty Act. Discussion of the Proposed Project’s impact on migratory birds and related habitat is provided in the Natural Features section of this Environmental Assessment, below.

Because the Project would have no effect on endangered or threatened species or critical habitat, there are no formal compliance steps or mitigation required and no further analysis is necessary.

References:

Helix Environmental Planning, Inc., Scholar Way Senior Apartment Community Initial Study and Mitigated Negative Declaration, October 2020.

Sacramento County, Swainson’s Hawk Mitigation Areas Map, 2005.


The Project would include construction that would increase residential densities; therefore, HUD requires an analysis of current or planned stationary aboveground storage containers within 1 mile of the Project Site.

As stated above, the USEPA’s RCRA database identified several hazardous materials handlers and waste generators in close proximity to the Project Site to the south and west; however, these were small generators and handlers of hazardous waste and included commercial uses that are typically found in urban environments, such as home improvement stores, pharmacies, and photo processing businesses. The database listings for these uses did not indicate that any releases of hazardous materials have occurred that could affect future residents of the Project Site. Upon review of aerial photography of the facilities identified above, aboveground storage tanks of more than 100-gallon capacity did not appear on these sites.
Additionally, per the National Pipeline Mapping System maintained by the U.S. Department of Transportation, the nearest gas transmission pipeline is located within East Bidwell Street along the western boundary of the Project Site. There are no hazardous liquid pipelines, liquid spill accidents, or gas release incidences within the Project vicinity. Further, Project-related grading and construction activities would not take place within the East Bidwell Street right-of-way. With standard construction precautions, there would be minimal risk of puncturing the gas transmission line to the west of the Project Site. 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. Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary.

**References:**

Google Earth, map data 2020.


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<th>Farmlands Protection</th>
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<td>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</td>
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Federal projects are subject to Farmland Protection Policy Act requirements if they may irreversibly convert farmland to a nonagricultural use. The Project would involve the construction of new housing for seniors on a site that has been previously disturbed (graded). 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 grazing land is located 1,300 feet north of the Project Site. However, this land is currently associated with Folsom Lake College and has not been used for agricultural purposes for at least three decades. Aerial imagery shows this land as undeveloped with the limited development of what is now Folsom Lake College immediately north of Scholar Way. Because the Project Site would not result in physical impacts beyond the boundaries of the Project Site, the Project would not convert prime farmland or farmland of local importance to another use. Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary.

**References:**

California Department of Conservation, California Important Farmland Finder, map generated on December 21, 2020.

<table>
<thead>
<tr>
<th>Floodplain Management</th>
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<td>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</td>
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The Project would involve construction of new affordable housing for seniors on a site that has been previously disturbed by past grading activities. Section 24 CFR 55.1 prohibits any HUD action other than a functionally dependent use (e.g., dams, marinas, and port facilities) to be located in a floodway. The Project Site is located within an Area of Minimal Flood Risk (Zone X) as designated by FEMA on flood map number 06067C0117H. As such, the Project Site is located outside of a 100-year or 500-year floodplain or floodway (outside of a Special Flood Hazard Area). Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary.

**References:**

FEMA, Flood Insurance Rate Map (FIRM) 06067C0117H.


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<th>Historic Preservation</th>
<th>Yes</th>
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<td>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</td>
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The Project would involve construction of new affordable housing for seniors on a site that is currently vacant but has been previously disturbed by past grading activities. The following analysis is based, in part, on a cultural resources assessment prepared for the Project by Helix in 2020, as well as correspondence with the California Office of Historic Preservation (OHP).

**Background Research**

The cultural resources assessment completed by Helix included details about the records search conducted at the North Central Information Center (NCIC), which addressed the Project Site and a 0.25-mile radius around the Project Site. Sources of information included previous survey and cultural resources files, the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), the OHP Archaeological Determinations of Eligibility, the OHP Directory of Properties in the Historic Property Data File, historical topographic maps, and historical aerial photographs. In total, the records search identified 17 studies that have previously been conducted within 0.25 miles of the Project Site, with four reports (003830, 004481, 009185, and 011191) addressing all or parts of the Project Site. These four reports relate to the Broadstone No. 3 Specific Plan area, within which the Project Site is included, and utility improvements in the Project area. Additionally, the records search determined that eight previously recorded cultural resources are located within 0.25 miles of the Project Site, with two resources partially located within the Project Site: the remains of the Woodard and Gould Ranch Fence and the Keeffe-McDerby Mine Ditch. The Woodard and Gould Ranch Fence was originally recorded in 1991 and consists of historic property boundary fences in the form of rock walls, brush fences, and wire fences totaling...
over 4.2 miles in length. A small section of the fence line originally ran north to south through the southeastern portion of the Project Site. This resource has been determined ineligible for the NRHP but has not been evaluated for eligibility for listing in the CRHR. The Keefe-McDerby Mine Ditch was also originally recorded in 1991, and, while the majority of the ditch is documented to the east of the Project Site, a small portion originally intersected the northeastern portion of the Project Site. This resource was found eligible for listing in the CRHR and NRHP in 2011. Potentially significant impacts to the ditch by the proposed Folsom South of U.S. Highway 50 Specific Plan were mitigated through Historic American Engineering Record (HAER) documentation in 2015. There is no evidence that either of these two sites remain on the Project Site. As such, the Project would not affect these historic properties.

**Archaeological Survey**

In May 2020, Helix conducted a pedestrian survey to characterize any prehistoric or historic-era archaeological resources located within the Project Site. The survey consisted of a pedestrian walkover of the approximately 4.2-acre Project Site in parallel transects spaced at 10-meter intervals. During the survey, the ground surface was examined for the presence of historic-era artifacts (e.g., metal, glass, ceramics), prehistoric artifacts (e.g., flaked stone tools, tool-making debris), and other features that might represent human activity that took place more than 50 years ago. Conditions during the survey were generally good, with sparse vegetation in many areas that allowed for adequate ground surface visibility. As stated above, the survey found no evidence of the Woodard and Gould Ranch Fence and the Keefe-McDerby Mine Ditch, and no new cultural resources were found. All man-made materials on the Project Site appeared to be less than 50 years old or were nondiagnostic fragments that cannot be attributed to a specific date range. Therefore, because the Project Site has been previously disturbed, and because the archaeological survey did not discover any resources, the potential for encountering buried historical or archeologic resources during grading or shallow excavation is low. **Mitigation Measure CUL-01** identifies procedures that the applicant shall follow if any historical or archaeological resources are discovered in order to reduce, if not eliminate, any unanticipated adverse impacts to cultural resources. This mitigation measure is included below.

**Mitigation Measure CUL-01:** In the event that cultural resources are exposed during ground-disturbing activities, construction activities should be halted in the immediate vicinity of the discovery. If the site cannot be avoided during the remainder of construction, an archaeologist who meets the Secretary of the Interior’s Professional Qualifications Standards should then be retained to evaluate the find’s significance under the California Environmental Quality Act (CEQA) and the National Historic Preservation Act (NEPA). A report of the evaluation must be submitted to SHRA. If the discovery proves to be significant, additional work, such as data
recovery excavation, may be warranted and should be discussed in consultation with the City and SHRA.

Native American Consultation

In compliance with California Assembly Bill (AB) 52 and CEQA, the City of Folsom initiated consultation with three tribes that have submitted general request letters with the City: Wilton Rancheria, Ione Band of Miwok Indians, and the United Auburn Indian Community (UAIC) of the Auburn Rancheria. Each tribe was provided a brief description of the Project and its location, the contact information for the City’s authorized representative, and a notification that the tribe has 30 days to request consultation. This consultation was initiated on April 13, 2020. On April 22, 2020, only nine days into the response window, the governor of California issued Executive Order (EO) N-54-20, due to the COVID-19 pandemic, which suspended the time frames associated with tribal consultation. As a result of the EO, the 30-day response window paused as of April 22 and resumed on June 22, 2020, which was the sunset date of the EO. Therefore, the response window for a tribe to request consultation closed on July 12, 2020. During the extended response window, only the UAIC responded to the City. Through the consultation process, the City and the UAIC agreed upon a series of actions to be undertaken by the Project applicant, which would address Project-impacts on unanticipated discovery of tribal cultural resources during Project construction. These actions are described below.

If potentially significant tribal cultural resources (TCRs) are discovered during ground disturbing construction activities, all work shall cease within 100 feet of the find. A Native American Representative from traditionally and culturally affiliated Native American Tribes that requested consultation on the project shall be immediately contacted and invited to assess the significance of the find and make recommendations for further evaluation and treatment, as necessary. If deemed necessary by the City, a qualified cultural resources specialist meeting the Secretary of Interior’s Standards and Qualifications for Archaeology, may also assess the significance of the find in joint consultation with Native American Representatives to ensure that tribal values are considered. Work at the discovery location cannot resume until the City, in consultation as appropriate and in good faith, determines that the discovery is either not a TCR or has been subjected to culturally appropriate treatment, if avoidance and preservation cannot be accommodated.

Per HUD Guidance, tribal consultation is required when substantial ground disturbance would occur as a result of a proposed project. Pursuant to Section 106 of the National Historic Preservation Act, consultation invitations were sent on December 21, 2020 to the four federally recognized tribes included in the HUD Tribal Directory Assessment Tool (TDAT) for the Project area. These tribes include the Buena Vista Rancheria of Me-Wuk Indians, the UAIC, the Wilton
Rancheria, and the Tule River Indian Tribe of the Tule River Reservation. HUD’s TDAT included two contacts (a chairperson and a Tribal Historic Preservation Officer) for three of these tribes. As a result, a total of seven consultation letters were sent to the four tribes, each containing a description of the Proposed Project, a summary of the AB 52 tribal consultation process conducted for the Project pursuant to CEQA, and the Proposed Project’s site plan. SHRA has not received any responses from these tribes, as of January 29, 2021.

**SHPO Consultation**

Based on the above information, the SHRA sent a letter (dated January 12, 2021) to the California OHP, 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 January 28, 2021, stating that the California OHP agrees with SHRA’s finding of No Historic Properties Affected by the Proposed Project (the undertaking).

**Summary**

Based on the NCIC records search, literature review, archival research, Native American consultation, and SHPO consultation, there are no historic properties or historical resources within the Project Site that would be affected by the Project. Standard late discovery mitigation measures have been included as conditions of approval for the Project, enforced by the City of Folsom, as discussed above. Further, Mitigation Measure CUL-01 will be implemented by the Project in the event that archaeological resources are identified during Project-related ground-disturbing activities (). The Project is in compliance with Section 106 of the National Historic Preservation Act. There are no formal compliance steps required and no further mitigation is necessary.

**References:**


<table>
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<tr>
<th>Noise Abatement and Control</th>
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<td>Noise Control Act of 1972, as amended by the Quiet</td>
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The analysis in this section is informed, in part, by the Noise Analysis prepared for this Project by Helix in October 2020. This technical analysis was reviewed by Michael Baker International and found sufficient for addressing HUD’s Noise Control Act/quiet Communities Act consistency thresholds, as discussed in the Noise Technical Memorandum prepared for this Project (Michael Baker International

To demonstrate consistency with HUD guidance on noise, HUD requires that the Environmental Review Record contain one of the following:

- Documentation the proposed action is not within 1,000 feet of a major roadway, 3,000 feet of a railroad, or 15 miles of a military or Federal Aviation Administration-regulated civil airfield;
- If within those distances, documentation showing the noise level is Acceptable (at or below 65 DNL [Day/Night Noise Level]);
- If within those distances, documentation showing that there is an effective noise barrier (i.e., that provides sufficient protection); or
- Documentation showing the noise generated by the noise source(s) is Normally Unacceptable (66–75 DNL) and identifying noise attenuation requirements that will bring the interior noise level to 45 DNL and/or exterior noise level to 65 DNL.

**Project Generated Noise**

**Project Construction**

Short-term construction noise levels are temporary and have a short duration, resulting in periodic increases in the ambient noise environment. The closest noise-sensitive receptors that may experience elevated noise levels during construction are an adjacent church to the east, residential uses to the east across Cavitt Drive, and a learning center to the southeast. Section 8.42.060 of the Folsom Municipal Code exempts construction noise from noise level limits provided that construction does not occur before 7:00 a.m. or after 6:00 p.m. on weekdays, or before 8:00 a.m. or after 5:00 p.m. on Saturday or Sunday. Therefore, Project compliance with the City’s allowable construction hours would ensure no adverse noise impacts would occur during construction.

An on-site source of vibration during Project construction would be a vibratory roller (primarily used to achieve soil compaction as part of the foundation and paving phase of construction), which is expected to be used within approximately 130 feet of the church to the east. A vibratory roller creates approximately 0.21 inch-per-second (in/sec) peak particle velocity (PPV) at a distance of 25 feet and a PPV of 0.03 in/sec at a distance of 130 feet. Therefore, the maximum construction vibration level of 0.03 in/sec PPV at the church property would be below the California Department of Transportation (Caltrans) designated annoyance threshold of 0.04 in/sec PPV, as noted in Caltrans’ *Transportation and Construction Vibration Guidance Manual* (2020). Further, the maximum vibration level (i.e., 0.03 in/sec PPV) would not exceed the Federal Transit Administration’s 0.2 in/sec PPV building damage threshold. Other than the church, the next nearest sensitive receptor to the Project Site would be the single-family residences east of the church. These residences would be farther than 130 feet away from Project construction activities and would, therefore, experience vibration...
less than 0.3 in/sec PPV. Thus, no adverse impacts concerning construction vibration would occur.

**Project Operation**

The Project would include the installation of heating, ventilation, and air conditioning (HVAC) units on the roof of the proposed buildings. The units would be located behind a parapet wall of equal or greater height to the HVAC unit, which would provide some noise attenuation. It was assumed that 14 HVAC units (16-ton capacity) would meet the Project's air circulation needs. Simultaneous use of these 14 HVAC units would result in an estimated noise level of 39.1 dBA eq at the property line to the east adjacent to the off-site church and an estimated noise level of 33.3 dBA L eq at the property line to the south adjacent to the off-site commercial uses. As the City’s exterior noise limit for air condition units is 50 dBA and the more stringent nighttime noise limit is 45 dBA, Project operation would not result in adverse noise impacts.

Per the Traffic Impact Analysis conducted for the Project, the Project is expected to generate approximately 417 daily trips. In general, doubling the traffic volume on a street segment would cause a doubling in sound energy (a 3-dBA increase), which would be considered a perceptible and, therefore, significant increase. Under existing conditions, Cavitt Drive accommodates 2,200 average daily trips (ADT), Scholar Way accommodates 6,700 ADT, and East Bidwell Street accommodates 38,100 ADT. At 417 daily trips, Project-generated traffic levels would be well below the level needed to double the existing traffic volumes. As such, the Project would not result in a perceptible increase in noise levels along roadways in the vicinity of the Project Site, and no adverse impacts would occur.

**Project Location**

The nearest airport to the Project Site is the Cameron Airpark, which lies approximately 7.8 miles to the east. The Project Site is not located within an Airport Land Use Compatibility Plan area. A Class I bicycle path and a railroad corridor is immediately adjacent to the Project Site to the west. The railroad track is occasionally used by the Placerville and Sacramento Valley Railroad, which is a nonprofit organization that offers recreational train rides on historic trains between downtown Folsom to the north and Latrobe to the south. The Project Site is immediately adjacent to East Bidwell Street, which is a major roadway. Given the Project Site’s proximity to this major roadway and a functioning railway, a HUD-required noise assessment was performed for the Project Site, the results of which are detailed below.

Ambient traffic noise levels were quantified for the Proposed Project’s outdoor activity areas (i.e. courtyard, bocce ball court, and community garden) and interior areas. The noise levels experienced at the Project’s outdoor activity areas would not exceed HUD’s exterior noise requirement of 65 dBA DNL (Ldn).³ Specifically, the community dining

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³ Noise levels presented in Section XIII, Noise, of the Initial Study and Mitigated Negative Declaration, prepared by Helix Environmental Planning, Inc. for the Project, are depicted in Community Noise Equivalent Level (CNEL) values. However,
patio is estimated to be exposed to noise levels of 57.7 L_{dn} from Scholar Way and 46.6 L_{dn} from Cavitt Drive, for an estimated combined noise level of 58.0 L_{dn}. The bocce ball court and community garden are estimated to be exposed to noise levels of 53.9 L_{dn} from Scholar Way and 47.7 L_{dn} from Cavitt Drive, for an estimated combined noise level of 54.8 L_{dn}. Noise levels at the Project’s outdoor use area would, therefore, comply with the HUD’s exterior noise requirement of 65 dBA L_{dn}.

Noise levels along Scholar Way and East Bidwell Street would exceed HUD’s interior noise standard of 45 dBA L_{dn} at units facing East Bidwell Street. The units experiencing the greatest noise impact would be those at the northwestern corner of the Project Site as they would be exposed to traffic noise from Scholar Way and East Bidwell Street. Specifically, the noise analysis prepared for the Project found that these units would be exposed to traffic noise of approximately 68.3 dBA L_{dn} from East Bidwell Street and Scholar Way. However, this is considered a conservative noise estimate because it assumes traffic along both East Bidwell Street and Scholar Way would be flowing at full speed simultaneously, which is not possible given their perpendicular orientation (if one street is flowing at full speed, the other must be at a stop). HUD guidance states that if a project is located within a normally unacceptable noise zone (greater than 65 dB, but not exceeding 70 dB), then noise attenuation is required for new construction.

To mitigate this impact, Mitigation Measure NOI-01 provides minimum design standards for habitable areas (bedrooms and living rooms) that have a direct line-of-sight to East Bidwell Street, which shall be implemented by the applicant. This mitigation measure includes performance standards for the ventilation system (so that windows can remain closed for extended periods of time), and minimum insulation standards for walls and windows to reduce interior noise below HUD’s exterior noise requirement of 65 dBA L_{dn}. This mitigation measure is included below.

Mitigation Measure NOI-01: Prior to the issuance of building permits, the project applicant shall demonstrate, to the satisfaction of the City of Folsom and SHRA, that final design plans include the following for the Project’s habitable areas (both living rooms and bedrooms) with a direct line of sight to East Bidwell Street:

- Minimum exterior wall requirement of STC 46 with a construction of standard 0.875-inch stucco over 0.5-inch shearwall on 2x6 studs with 0.625-inch Type “X” drywall.
- Minimum window requirement of STC 28 with a window construction of dual glazing window thickness 0.125-inch and 0.5-inch air gap.

Day-Night Sound Level (L_{dn}) values are typically always within 1 dBA of CNEL values. Therefore, this analysis considers the CNEL values of the Initial Study to be analogous with the L_{dn} values required for HUD noise assessments.
• Appropriate means of air circulation and provision of fresh air shall be incorporated in the project to allow windows to remain closed for extended intervals of time so that acceptable levels of noise can be maintained on the interior.

• The building design shall include a mechanical ventilation system that meets the criteria of the International Building Code (Chapter 12, §1203.3 of the 2013 California Building Code) to ensure that windows would be able to remain permanently closed.

As shown in Table 2, below, interior noise levels at the unit with the greatest noise exposure (the unit in the northwestern corner of the North Building, which would be the closest to East Bidwell Street and Scholar Way) would experience an interior noise level of 36.7 dBA $L_{dn}$ in the bedroom and 32.8 dBA $L_{dn}$ in the living room with mitigation incorporated.

**Table 2: Exterior to Interior Noise Levels**

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<td>Interior Noise with Mitigation</td>
<td>36.7</td>
<td>32.8</td>
</tr>
<tr>
<td>Above 45 dBA $L_{dn}$ Interior Noise Standard?</td>
<td><strong>No</strong></td>
<td><strong>No</strong></td>
</tr>
</tbody>
</table>

Notes:

• To determine interior noise levels at the units with the greatest noise exposure (those units located at the northwest corner of the Project Site), an exterior-to-interior analysis was conducted for the northwest corner unit bedroom that includes two walls with exposure to traffic noise and the northwest corner unit living room that includes one wall with exposure to traffic noise.

The interior noise level within the unit exposed to the greatest levels of exterior noise would not exceed HUD’s interior noise requirement of 45 dBA $L_{dn}$ with incorporation of Mitigation Measure NOI-01. Therefore, while exterior noise levels on portion of the Project Site would exceed the HUD threshold for a normally unacceptable noise zone (above 65 dBA, but below 70 dBA), noise attenuation features have been incorporated into the Project design, which would reduce interior noise levels to less than 45 dBA (as required by HUD environmental criteria and 24 CFR part 51). As such, with incorporation of Mitigation Measure NOI-1, the Project would comply with HUD noise regulations at 24 CFR Part 51 Subpart B and no formal compliance steps are required.

References:


<table>
<thead>
<tr>
<th>Sole Source Aquifers</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</td>
<td>☑️</td>
<td>☐️</td>
</tr>
</tbody>
</table>

The Project would involve construction of new affordable housing for seniors in the City of Folsom. The 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 121 miles southwest of the Project Site). Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary.

**References:**


<table>
<thead>
<tr>
<th>Wetlands Protection</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Executive Order 11990, particularly sections 2 and 5</td>
<td>☑️</td>
<td>☐️</td>
</tr>
</tbody>
</table>

The Proposed Project would involve new construction, as defined in EO 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]).”

As determined using the USFWS’s National Wetlands Inventory (NWI), there are no wetlands within or immediately adjacent to the Project Site. The NWI identifies a freshwater emergent wetland habitat (classified as PEM1C) west of the Project Site; however, this feature appears to run through existing commercial land uses northwest and southwest of the Project Site, across East Bidwell Street. As a result, this wetland feature is likely incorrectly mapped, as this feature does not currently exist. As such, grading and construction activities associated with the Project would not result in sedimentation or other impacts that would negatively impact wetland habitats.

Further, grading and construction activities associated with the Project would be required to comply with state stormwater runoff and sedimentation prevention requirements (such as the SWRCB’s Construction General Permit), and new construction requirements...
enforced by the City of Folsom (such as completion of a required Stormwater Pollution Prevention Plan, per Folsom Municipal Code Chapter 8.70, Stormwater Management and Discharge Control). 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, no wetlands would be impacted by new construction as defined by EO 11990. Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary.

References:

<table>
<thead>
<tr>
<th>Wild and Scenic Rivers</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</td>
<td>☒</td>
<td>☐</td>
</tr>
</tbody>
</table>

The Project Site is not within the vicinity of a Wild and Scenic River as identified on the National Wild and Scenic Rivers System, operated by the USFWS, or the Nationwide Rivers Inventory, operated by the National Park Service. The closest Wild and Scenic River to the Project Site is the American River, which is located approximately 5.3 miles southwest of the Project Site and runs from the confluence with the Sacramento River to the Nimbus Dam. Therefore, because the Project Site is not in the proximity of a Wild and Scenic River, as identified by the federal agencies that manage the National Wild and Scenic Rivers System (USFWS, National Park Service, Bureau of Land Management, and the National Forest Service), there are no formal compliance steps or mitigation required and no further analysis is necessary.

References:

**ENVIRONMENTAL JUSTICE**

<table>
<thead>
<tr>
<th>Environmental Justice Executive Order 12898</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐</td>
<td>☒</td>
<td></td>
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</table>

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 EO 12898.

**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

<table>
<thead>
<tr>
<th>Environmental Assessment Factor</th>
<th>Impact Code</th>
<th>Impact Evaluation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>LAND DEVELOPMENT</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design | (2) No impact anticipated | **Conformance with Plans**  
According to the Sacramento Area Council of Governments’ (SACOG) 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS), adopted on November 18, 2019, the SACOG region is experiencing rapid growth, with the region projected to add approximately 260,128 housing units between 2016 and 2040. The SACOG region includes 28 member cities in Yuba County, Placer County, Sutter County, Yolo County, Sacramento County, and El Dorado County. The SACOG region’s population is projected to grow from 2,376,311 in 2016 to 2,996,832 in 2040, which would be an increase of 620,521 persons. The population of residents over 65 years old in the SACOG region is projected to increase by 253,000 between 2019 and 2040. Within this group, approximately 210,000 are projected to be over 75 years old. As a result, SACOG states that communities in the SACOG region must focus on housing opportunities for seniors that will help them stay active, avoid social isolation, and connect to community resources.

The MTP/SCS estimates that the City of Folsom will experience an increase of 10,470 new housing units and 6,300 new jobs by 2040. According to the California Department of Finance, the City of Folsom has an estimated total population of 81,610 (as of January 2020) with an average of 2.69 persons per household. This represents an increase over 2010 population estimates (72,203 with an average persons per household of 2.62) of approximately
9,407 persons, or an average increase of approximately 941 persons per year.

The Project would result in an increase of 109 senior housing units and one manager’s unit, for a total of 110 residential units. With an average household size of 2.69 persons per household, a project of this size could result in an increase of approximately 296 persons to the population of the City of Folsom. However, the actual population increase associated with the Project would likely be smaller than 296 persons considering that all 110 units would be one bedroom and one bathroom, and, according to the City’s Housing Element, most senior households consist of a single elderly person living alone or a couple. Therefore, the maximum likely population increase associated with the Project would be 220 persons or 2 persons per unit. This would represent approximately 0.3 percent of the current population of the City of Folsom. Further, an increase of 220 seniors would represent approximately 0.09 percent of the total increase in persons over 65 within the SACOG region between 2019 and 2040.

Therefore, because the Project would represent a small percentage of the current population of the City of Folsom, and a small percentage of the total regional growth of persons over 65 projected by the MTP/SCS, the Project would not conflict with population projections.

Further, the City’s General Plan has a number of goals and policies to which the Project would contribute. These goals and policies include:

**Land Use and Urban Design Element**

- Goal LU 2.1, Policy LU 2.1.2, Broadstone District: Encourage a mix of uses, including an emphasis on high-density residential, and pedestrian- and bicycle-friendly street patterns in the Broadstone District to increase its functionality as a vibrant gathering place for the community.
- Goal LU 3.1, Policy LU 3.1.1, Mixed-Use Nodes: Encourage mixed-use development in nodes located at major intersections that include housing, open space, and offices. This development pattern should reflect best practices in mixed-use development, in contrast to strip retail developments along corridors.
- Goal LU 3.1, Policy LU 3.1.5, East Bidwell Street: Encourage new development along East Bidwell Street by creating a stronger mixed-use development pattern, both horizontal and vertical, with an emphasis on medium- and higher-density housing, while also addressing local and citywide demand for retail and services.

**Housing Element**

- Policy H-3.1: The City shall encourage residential projects affordable to a mix of household incomes and disperse affordable housing projects throughout the city to achieve a balance of housing in all neighborhoods and communities.
- Policy H-5.1: The City shall strive to ensure adequate and affordable housing for seniors.
• Policy H-5.2: The City shall encourage housing for seniors and persons with disabilities to be located near public transportation, shopping, medical, and other essential services and facilities.

Additionally, the Project Site is included on the Housing Element’s Vacant Residential Land Inventory (Table 3-A-2, January 2013), which identifies the Project Site for the development of 83 affordable housing units. The 109 units affordable to low- and very low-income units in the Project would satisfy the requirement for 83 affordable units identified for the Project Site under the City’s General Plan Housing Element Vacant Residential Land Inventory.

Compatible with Land Use and Zoning

As stated above, the Project Site is designated as Multifamily High Density (MHD) in the City of Folsom’s General Plan, which provides for multifamily residential units in apartment buildings and has a maximum density of 30 units per acre. The City’s General Plan also designates the Project Site as within the East Bidwell Corridor overlay zone, which allows mixed-use development, as well as commercial and residential uses that are mutually compatible along East Bidwell Street. The density range of this overlay zone is 20-30 units per acre, and the floor area ratio is 0.5 to 1.5. As the Project would provide 110 units on 4.2 acres of land, the number of units per acre would be 26.1 units/acre and would be within the allowable density on the Project Site. The Project’s floor area ratio would be approximately 0.5.

The zoning designation of the Project Site is SP 95-1 (Broadstone Unit No. 3 Specific Plan) with an underlying zoning designation of R-4 PD (General Apartment, Planned Development). The City’s General Plan Land Use Element states that the Broadstone District is a shopping and entertainment district with the Palladio shopping center (a walkable shopping, dining, and entertainment commercial center) at its center. The Palladio, which is located approximately 0.5 miles south of the Project Site, is ringed by other shopping and dining options, such as the commercial centers directly south and east of the Project Site. According to Section 17.18.020 of the Folsom Municipal Code, apartments are a permitted use within an R-4 zone. Per Section 17.38.050 of the Folsom Municipal Code, the Project would require a Planned Development permit review entitlement given the Project Site’s location within a Planned Development District. The purpose of this permit entitlement is to allow greater flexibility in the design of integrated developments than otherwise possible through strict application of land use regulations.

The Project would be consistent with the development standards required for development within an R-4 zone, including lot area (minimum 7,500 square feet required, 183,034 square feet provided), lot width (minimum 75 feet required, 215 feet provided), building coverage (maximum 60 percent of lot area allowed, 15.1 percent of lot area proposed), front yard setback (minimum 20 feet required, 55 feet proposed), rear yard setback (not less
than 10 feet required, 92 feet proposed), and side yard setback (minimum 10 feet required, 105 feet proposed).

As such, the Project would be consistent with current Folsom Municipal Code zoning regulations and no impact is anticipated.

**References**

City of Folsom, *General Plan, Land Use Element*, August 2018.


<table>
<thead>
<tr>
<th>Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff</th>
<th>(2) No impact anticipated</th>
</tr>
</thead>
</table>

**Soil Suitability and Slope**

According to the *Geotechnical Engineering Study for LDS Church Remainder Lot* (Geotechnical Study) prepared for the Project (Youngdahl Consulting Group 2019), the Project Site is located on the eastern edge of Sacramento County, located within the western foothills of the Sierra Nevada geomorphic province of California. The Project area and general vicinity are underlain by the Copper Hill volcanics, which are a sequence of Late Jurassic-age volcanic rock that overlies the Salt Spring Slate. It is composed of primarily andesitic or basaltic pyroclastic rocks, lava, and pillow lava with subordinate felsic porphyritic and pyroclastic rocks.

Subsurface explorations conducted as part of the Geotechnical Study included the excavation of six exploratory test pits on the Project Site. Test pits encountered sandy silt materials with gravel and were generally medium dense to very dense and in a slightly moist to moist condition, aside from test pit 4 (located in the central-east portion of the site), which encountered fill materials in a loose condition to a depth of approximately 4 feet.

Groundwater conditions were encountered 3 feet below ground surface at test pit No. 2 on the northeast side of the Project Site and 5 feet below ground surface at test pit No. 3 on the west side of the Project Site. While elevated groundwater may be present on the Project Site, it would only be elevated during the wet times of year.

There are no active faults or earthquake fault zones on or immediately adjacent to the Project Site. The nearest active fault is the Dunnigan Hills fault, which is 65 kilometers (approximately 40 miles) west of the Project Site. The nearest potentially active fault is the Rescue fault, which is 17 kilometers (approximately 11 miles) northeast of the Project Site. As such, given the distance between the Project Site and the nearest active or potentially active earthquake faults, the absence of permanently elevated groundwater, and the shallow depth to bedrock, the potential for seismically induced damage (i.e., related to liquefaction or settlement) would be negligible. Further, the existing slopes on the Project Site were observed to have adequate vegetation on the slope face, appropriate drainage away from the slope face, and no apparent tension cracks or slump blocks in the slope face or at the head of the slope. No other...
indications of slope instability, such as seeps or springs, were observed. Additionally, due to the absence of a permanently elevated groundwater table, the relatively low seismicity of the area, and the relatively shallow depth to rock, the potential for seismically induced slope instability for the existing slopes is considered negligible.

While a thin layer of highly expansive clay soils is present on top of the weathered bedrock on the Project Site, the amount of fill soil on the Project Site overlying these clay materials eliminates the need for mitigation of the existing clay expansive soils. The Geotechnical Study prepared for the Project states that once overexcavated and recompacted, the native soils, rock, and fills may be considered “engineered” and would be suitable to support the proposed development.

The Geotechnical Study 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., drainage controls, dust control, clearing and stripping existing vegetation, overexcavating unsuitable existing fills); engineered fill standards (e.g., criteria to determine suitability of on-site soils and import materials); slope configuration and grading; underground improvements; and design recommendations relating to seismic criteria, foundations, and retaining walls. The full list of recommendations is provided in the Geotechnical Study available in the Environmental Review Record.

**Erosion, Drainage, and Stormwater Runoff**

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, which regulates discharge of urban runoff from the Municipal Separate Storm Sewer System, issued by the Central Valley RWQCB. This NPDES permit requires the City of Folsom 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 SWRCB Construction General Permit, which requires construction activities to incorporate best management practices (BMPs). These BMPs could include the use of berms or drainage ditches to divert water around the site and prevent sediment from migrating off-site by using temporary swales, filters, or silt fencing. Additionally, the Project would be required to comply with the City of Folsom Grading Code (Folsom Municipal Code Section 14.29), which regulates grading citywide through a series of standards and procedures for grading and excavation to minimize hazards and protect against erosion.

Prior to the issuance of a grading or building permit, the City would require the applicant to prepare a soils report, which includes a detailed grading
plan and an erosion control plan, by a qualified and licensed engineer. This soils report would identify soil hazards, including potential impacts from erosion. The City would be required to review and approve the erosion control plan based on the California Department of Conservation’s *Erosion and Control Handbook*. The erosion control plan would identify protective measures to be implemented during excavation, temporary stockpiling, disposal, and revegetation activities.

Once occupied, the Project Site, which is currently undeveloped, would be predominantly covered by impervious surfaces and managed gardens/turf areas and, thus, would not be susceptible to substantial erosion or siltation. The slope along the western boundary of the Project Site would be covered by stabilizing ground cover, shrubs, and trees to reduce the potential for erosion or slope failure.

While Project operation would not result in substantial erosion, implementation of the Project would result in an increase in impervious surface area as compared with existing conditions. The Project would utilize the drainage swale along the eastern boundary of the Project Site to convey Project-generated stormwater off-site via an underground existing storm drain at the outlet of the drainage swale, which runs along the Project Site’s northern boundary with Scholar Way and connects to stormwater infrastructure in East Bidwell Street. The Project would install a pipe filter with manhole access within the Project’s proposed driveway entrance from Scholar Way which would capture solids in stormwater conveyed to the municipal stormwater system. The Preliminary Drainage Study prepared for this Project (TSD Engineering, Inc., 2020) states that the Project would utilize disconnected pavement and roof drains, meaning that runoff would drain to vegetated areas before entering the public underground system.

Further, the analysis performed as part of this Preliminary Drainage Study determined that the infiltration basins would be adequate to effectively treat generated runoff from the Project Site before draining to the public underground system. Finally, the Project applicant is required to submit final drainage plans and final erosion control plans for review and approval by the City prior to final approval of Project plans. The drainage plans must include measures to minimize the total amount of additional surface runoff and to limit the flows released to off-site receiving waters to existing pre-development levels in accordance with the requirements of the City of Folsom Public Works Department. The erosion control plan will include BMPs to minimize and control the level of pollutants in stormwater runoff, and in runoff released to off-site receiving waters.

Therefore, because the Project would be required to comply with existing local and regional water quality requirements, no project impacts are anticipated and no mitigation is necessary.

**References:**

Hazard and Site Safety

The Project Site is located in an urbanized area and is not in the vicinity of natural hazards, such as hazardous terrain, volcanoes, steep slopes/landslide areas, and fire-prone areas. The Project Site does not include any known poisonous plants, animals, or insects. In addition, the Project Site is not located in an area susceptible to wind or sandstorms. The Project Site is located outside of the 100-year and 500-year floodplains, as delineated by FEMA. The Phase I ESA prepared for the Project found that there are no recognized environmental concerns associated with the Project Site and that the site has no history of past land uses associated with potentially hazardous materials. The Phase I ESA indicated that the Project Site has the potential to contain elevated radon concentrations. With implementation of Mitigation Measure CON-01, the Project would not expose future residents to hazards or hazardous materials.

As stated above, there are no active faults or earthquake fault zones on or immediately adjacent to the Project Site. The nearest active fault is the Dunnigan Hills fault, which is 65 kilometers (approximately 40 miles) west of the Project Site and the nearest potentially active fault is the Rescue fault, which is 17 kilometers (approximately 11 miles) northeast of the Project Site.

According to the Geotechnical Study prepared for the Project, the existing slope on the Project Site has adequate vegetation, appropriate drainage, and no evidence of tension cracks or slump blocks in the slope face. Due to these observations, coupled with the relatively low seismicity of the area and the relatively shallow depth to bedrock, the Geotechnical Study determined that the potential for seismically induced slope instability, liquefaction, settlement, or surface ruptures is negligible.

Therefore, because there is little risk of these hazards posing a substantial threat to the proposed development on the Project Site or Project residents, no project impacts are anticipated and no mitigation is necessary.

Nuisances

An inspection of the Project Site conducted as part of the Phase I ESA prepared for this Project did not identify evidence that the site would be affected by gas, smoke, or fumes; odors; excessive vibration; glare from adjacent commercial uses; vacant buildings; unsightly land uses; front lawn parking; abandoned vehicles; or vermin infestation from the uses
surrounding the Project Site. Therefore, no project impacts are anticipated and no mitigation is necessary.

**Noise**

As a multifamily residential development, the Project itself would not be a noise-generating facility (such as a manufacturing or industrial use). Noise generated by the Project during construction is addressed in the Noise Abatement and Control section, above.

**References:**


| Energy Consumption | (2) No impact anticipated |

**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 2019 California Green Building Standards Code (CALGreen Code, Title 24, Part 6), which requires 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. In 2019, Title 24 standards were updated to include energy-efficient improvements to residential development, including photovoltaic panel standards, as well as improved wall, attic, water heating, and lighting standards. The Proposed Project would include rooftop photovoltaic panels, which would provide 199 kilowatts of energy for the Project and offset the Project’s electricity demands from electric utility providers. Additionally, Section 17.57.090 of the Folsom Municipal Code requires one bicycle parking space for every five units, which equates to 22 bicycle parking spaces required for the Project. The Project would provide bicycle parking infrastructure to accommodate 24 bicycles in designated parking spaces located on the north, south, and east sides of the proposed buildings. Providing bicycle parking would encourage use of alternative modes of transportation and subsequently reduce greenhouse gas (GHG) emissions from Project-related vehicle traffic.

The Project Site is located in an urban environment, which is within walking distance (0.5 mile) of restaurants, home improvement, retail, pharmacies, banking institutions, veterinarian, pet supply store, and a major grocery store. Further, the Project Site is located on the Folsom Stage Line (Bus Route 10), which stops on Scholar Way in front of the Project Site and connects to major commercial and institutional destinations throughout the City, including Kaiser Medical Center, Folsom Premium Outlets, historic downtown Folsom, Mercy Folsom Hospital, and the Palladio commercial center, as well as light rail stations at Iron Point and the historic downtown area. As a result, the Project would encourage...
walking and transit usage, resulting in less energy consumption than a similar development in an auto-dependent, suburban area.

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 Project would not result in a significant source of energy consumption. Therefore, no project impacts are anticipated and no mitigation is necessary.

**Energy Utilities and GHG Emissions**

Pursuant to the Environmental Factors guidance provided by HUD, the following analysis provides an overview of anticipated Project GHG emissions, as well as the capacity of energy utility providers. 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 company 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 28 percent renewable (biomass, geothermal, hydroelectric, solar, and wind), 44 percent large hydroelectric, 27 percent natural gas, and 1 percent nuclear.\(^4\)

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 60 percent by 2030 and requires all of the State’s electricity to come from carbon-free resources by 2045. Natural gas is supplied to the Sacramento area, including the Project Site, by Pacific Gas and Electric (PG&E).

No major upgrades to the electrical or natural gas delivery system are anticipated as a result of the 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 Project is not significant in relationship to the total number of consumers served by SMUD and PG&E. The Project would connect to existing electricity and natural gas utilities located within Scholar Way. As such, the Project would not require expansion of electricity or natural gas facilities.

The majority of GHG emissions associated with construction of the Project would occur during the grading and site preparation phase due to the use of large construction equipment, generators, and haul trucks, which

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\(^4\) SMUD includes multiple electrical power plans for consumers to choose from, including plans which would provide consumers with 100 percent solar power, as well as plans providing 80 percent natural gas generated power. The values discussed in this analysis are from the SMUD General Mix power plan. Source: SMUD, 2019 Power Content Label, revised October 2020.

[42]
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 Project residents and guests 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 that long-term transportation fuel consumption from Project operation would steadily decline over time. Further, the Project is required to comply with the City of Folsom’s Greenhouse Gas Reduction Strategy, which was adopted as part of the City’s General Plan update. A Consistency Checklist was created by the City to determine a project’s consistency with GHG reduction goals in the City’s General Plan and GHG Reduction Strategy document. The Checklist is required for projects that are subject to CEQA review. The Project includes the following GHG reduction strategies to help the City achieve its GHG emission reduction goals. These components of the Project include the following:

- The Project shall exceed the requirements of the 2016 California Building Energy Efficiency Standards (Title 24, Part 6) by 15 percent or more.
- The Project shall have a mix of uses with a minimum density of 20 units per acre or a floor area ratio of 0.75.
- The Project shall provide 5 percent more bicycle parking spaces than required in the City’s Municipal Code.
- The Project shall use high-performance diesel (also known as Diesel-HPR or Reg-9000/RHD) for construction equipment.
- The Project shall provide electric vehicle charging in 5 percent of total parking spaces.
- The Project shall divert to recycle or salvage at least 65 percent of nonhazardous construction and demolition waste generated at the Project Site in accordance with Appendix A4 of the CALGreen Code. This may be done by using a waste management company that can provide verifiable documentation that the waste diversion complies with this requirement.
- The Project shall comply with all applicable indoor and outdoor water efficiency and conservation measures required under CALGreen Tier 1, as outlined in the CALGreen Code.

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, as well as Project-specific GHG reduction strategies included as a condition of approval by the City of Folsom. Therefore, no project impacts are anticipated and no further mitigation is necessary.

References:
Helix Environmental Planning, Scholar Way Senior Apartment Community Initial Study and Mitigated Negative Declaration, October 2020.

<table>
<thead>
<tr>
<th>Environmental Assessment Factor</th>
<th>Impact Code</th>
<th>Impact Evaluation</th>
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<tbody>
<tr>
<td>SOCIOECONOMIC</td>
<td>(2) No impact anticipated</td>
<td>The Project would involve construction of 109 affordable housing units for seniors plus an additional unit for use by an on-site manager (for a total of 110 residential units). A minor increase in construction-related employment opportunities would occur as a result of Project construction and operation (leasing, site maintenance); however, this increase would not be substantial in relation to the surrounding commercial and institutional land uses that employ a greater number of people than the Project would generate during operation. The Project Site is surrounded by urban development, including existing roads, sidewalks, multiuse paths, and developed land uses that are served by existing utility infrastructure. As such, the Project would not extend infrastructure to a previously undeveloped area. Further, the Project would not be of a magnitude, either in terms of employment or number of available units, that would cause a significant number of people to relocate to the area solely for the purpose of being close to the Project Site. Therefore, the Project would not directly or indirectly increase or decrease temporary</td>
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</table>
Demographic Character Changes, Displacement

<table>
<thead>
<tr>
<th>(2) No impact anticipated</th>
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</table>

**Demographic Character Changes**

The Project would involve construction of 109 affordable housing units for seniors plus an additional unit for use by an on-site manager (for a total of 110 residential units). Because the Project Site is currently undeveloped, no existing residential units would be removed as part of the Proposed Project. Therefore, the Project would provide more housing opportunities for low-income senior households than current conditions.

There are no design features as part of the Project that would isolate a particular neighborhood or population, making access more difficult to local services, facilities, and institutions or other parts of the City. Rather, the Project would be located within walking distance (within 0.5 miles) of major commercial development with a variety of restaurant, retail, and other service uses. Additionally, the Project is bounded by a bicycle trail (separated from vehicle travel lanes) to the west along East Bidwell Street. Per the City of Folsom’s bicycle trail map, the City plans to expand this trail south to Iron Point Road, which contains a bicycle lane, and north to the Humbug Willow Creek Trail. The Project Site’s close proximity to commercial uses and transit opportunities, as well as easy access to recreation assets like the Folsom bicycle trail system, would serve to reduce physical barriers and population isolation.

Further, since the Project Site is surrounded by a church and single-family homes to the east, an institutional (higher education) use to the north, and commercial uses to the east and south, 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. Further, by introducing affordable, multi-family housing to the Project area, the Project would not significantly alter the racial, ethnic, or income segregation of the area’s housing.

**Displacement**

The Project Site is currently vacant and does not contain any residential units, commercial development, or institutions. As such, the Project would not result in the removal of any of these land uses. Rather, the Project would result in the construction of 109 new affordable housing units for seniors as well as a manager’s unit (for a total of 110 new housing units). Therefore, the Project would not result in displacement of any residents and would not destroy or relocate existing jobs or business establishments.

Further, the SHRA has identified a shortage of housing, including available low- and moderate-income housing. The Project would help to meet this need. Therefore, no project impacts are anticipated and no mitigation is necessary.

References:
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<tr>
<th>Environmental Assessment Factor</th>
<th>Impact Code</th>
<th>Impact Evaluation</th>
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<tr>
<td><strong>COMMUNITY FACILITIES AND SERVICES</strong></td>
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<tr>
<td>Educational and Cultural Facilities</td>
<td>(2)</td>
<td>No impact anticipated</td>
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<td>The Project Site is located within the Folsom Cordova Unified School District, the boundaries of which include the City of Folsom and the City of Rancho Cordova to the southwest. However, because the residential units associated with the Project would be restricted to affordable housing for seniors, there would be no school-aged children living at the Project Site. Therefore, the Project would not increase enrollment at area schools and would have no impact on educational facilities and classroom space. Further, the Project would provide on-site amenities, such as a community room, an outdoor dining and gather area, garden, dog park, and bocce ball court for use by Project residents. Such assets would reduce the demand on cultural facilities and recreation spaces provided by the City in nearby areas. Therefore, no project impacts are anticipated and no mitigation is necessary.</td>
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<tr>
<td>Commercial Facilities</td>
<td>(2)</td>
<td>No impact anticipated</td>
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<td>In addition to construction of 110 residential units, the Project would include indoor and outdoor community amenities, such as a community room, courtyard, garden, pet area, walking path, and bocce ball court. 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 Broadstone Marketplace commercial center directly to the south, which includes a grocery store, restaurants, a pharmacy, and other retail uses, and the Broadstone Plaza located west of the Project Site across East Bidwell Street, which includes restaurants, fast food, a pharmacy, and other retail uses. Further, a bus stop for the Folsom Stage Line 10 bus route is immediately north of the Project Site on Scholar Way, which connects the Project Site to other major commercial centers, such as downtown Folsom. Given the wide range of restaurant and retail uses within close proximity to the Project Site, there would be no substantial gaps in the range of available goods and services at a variety of price points that would be available to the Project’s residents. Finally, as the Project would not involve development of any commercial uses, the Project would not result in any new commercial enterprises that would displace existing small-scale retail establishments. Therefore, no project impacts are anticipated and no mitigation is necessary.</td>
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References:

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<tr>
<th>Health Care and Social Services</th>
<th>(2) No impact anticipated</th>
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The nearest hospital with emergency services to the Project Site is Mercy Hospital of Folsom, which is approximately 1.25 miles northwest of the Project Site. Five other hospitals are located in downtown Sacramento and would be accessible from the Project Site via the Gold Line light rail stations, which are accessible via the Folsom Stage Line 10, which stops on the north side of the Project Site. Mercy Hospital of Folsom has 24-hour emergency services, internal medicine, and specialty medical services. Additional medical facilities include the Kaiser Permanente Folsom Ambulatory Surgery Center, which is located approximately 0.7 miles south of the Project Site on Palladio Parkway, and the Kaiser Permanente Folsom Medical Center, which is located 1 mile southwest of the Project Site on Iron Point Road. Kaiser Permanente Folsom Medical Center includes radiology, urgent care, cancer care, adult and family medicine, addiction treatments, and optometry.

In the immediate Project vicinity, a medical office building occupied by the Sutter Health Medical Group, which includes an urgent care facility, is located approximately 500 feet north of the Project Site, on the west side of East Bidwell Street, immediately north of a Walgreens Pharmacy. An office building containing multiple dental health practices is located north of this medical office building. These medical office buildings, as well as the Walgreens Pharmacy, would be walkable from the Project Site and are accessible via sidewalks and crosswalks on Scholar Way and East Bidwell Street.

First-response emergency services are provided by the Folsom Fire Department (FFD), which operates out of four fire stations. The FFD includes 71 full-time equivalent staff. The Project Site is served by Station No. 37, located at 70 Clarksville Road, approximately 1,000 feet southwest of the Project Site. Therefore, adequate health care services, including emergency medical services, are available to serve the Project.

Regarding social services, the Sacramento County Health and Social Services Department provides state and federally mandated benefits and services to low-income residents in Sacramento County, including the City of Folsom. Such benefits and services include protective services, public health and immunizations, and other social services, such as HIV and other sexually transmitted disease testing, mental health services, CalFresh (food stamps) program administration, and veterans’ services. Because adequate social services would be available to residents of the Project Site, no project impacts are anticipated and no mitigation is necessary.

**References:**

City of Folsom, General Plan Draft EIR Public Services and Recreation Section, 2018.

Sacramento County, Health and Social Services Department home page (list of services), [https://www.saccounty.net/live-visit/Pages/HealthSocialServices.aspx](https://www.saccounty.net/live-visit/Pages/HealthSocialServices.aspx), accessed December 23, 2020.
As of 2016, the City of Folsom generated approximately 160 tons of solid waste per day, much of which is recycled. The City of Folsom’s Solid Waste Division of the Public Works Department provides collection and recycling service to residential and commercial users in the City. Refuse from the City, including the Project Site, is transported to the Sacramento County Kiefer Landfill, which is located at 12701 Kiefer Boulevard in Sloughhouse, California. The Kiefer Landfill is a Class III solid waste facility and collects 10,815 total tons of refuse per day. Kiefer Landfill has a total permitted capacity of 117.4 million cubic yards with 112.9 million cubic yards of capacity remaining. In 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) 65 percent of all construction-generated debris. 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 landfill and recycling infrastructure. The solid waste generated by the Project would be typical of the types of wastes generated by multifamily residential land uses throughout the City of Folsom. 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.

Finally, the City’s Solid Waste Division determined that the City’s solid waste disposal system would have sufficient capacity to serve the Project. Because there is available landfill capacity, and because the City administers a recycling and household hazardous waste disposal program, no project impacts are anticipated and no mitigation is necessary.

References:


City of Folsom, General Plan Draft EIR Utilities and Service Systems Section, 2018.


Helix Environmental Planning, Inc., Scholar Way Senior Apartment Community Initial Study and Mitigated Negative Declaration, October 2020

The City of Folsom Environmental and Water Resources Department is responsible for managing and maintaining the City’s wastewater collection system. The Sacramento Regional County Sanitation District (Regional San) provides wastewater treatment services for the City of Folsom. The Project Site is in 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 Folsom 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.

At the local level, the City of Folsom’s sewer collection system consists of 275 miles of pipeline and nine pump stations north of US 50. The City’s sewer system conveys approximately 8,000,000 gallons of wastewater per day to Regional San’s treatment system by force mains or gravity collection pipes.

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 an available treatment capacity of approximately 51 mgd. The Project, which would add 110 residential units and up to 220 residents to the City of Folsom and the Regional San service area, 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 capital 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. Finally, the City’s Wastewater Collection Division determined that the City’s sewer system would have capacity to serve the Project.

Because the SRWTP has adequate treatment capacity to serve the Project and because the City of Folsom’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. Therefore, no project impacts are anticipated and no mitigation is necessary.

References:

City of Folsom, General Plan Draft EIR, Utilities and Service Systems Section, 2018.
Water Supply

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<th>(2) No impact anticipated</th>
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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 Folsom, the City provides about 27,000 acre-feet per year (af/yr) to a population of approximately 64,000. The City has the rights to a total of 38,790 af/yr, with 22,000 af/yr derived from surface water rights to obtain water from Folsom Reservoir and Folsom South Canal and the remainder of the water supply derived from contracts and mutual aid agreements (utilized in emergencies) for surface water that is also obtained from the Folsom Reservoir and/or the Folsom South Canal. Due to contamination of the groundwater in the area, use of treated groundwater is restricted to only certain identified industrial uses. Total annual water demand is anticipated to increase from 25,575 af/yr in 2020 to 29,921 af/yr in 2040. This is primarily due to the increase in population of the City’s water service area, driven by isolated infill development projects, as well as large-scale residential development projects south of US 50.

The UWMP projects that, under normal year supply and demand scenarios, supply would exceed demand in 2020, 2025, 2030, 2035, and 2040 by between 8,869 af/yr and 13,215 af/yr. These values are decreased when evaluating the dry and multiple dry year scenarios; however, water supplies would continue to exceed demand by approximately 6,221 af/yr in 2040 under the multiple dry year scenario. Based on current management practices, the City would have sufficient water supplies to serve the Project. Therefore, no project impacts are anticipated and no mitigation is necessary.

References:

Public Safety - Police, Fire and Emergency Medical

| (2) No impact anticipated |

Police

The Project would be served by the City of Folsom Police Department (Folsom PD). Folsom PD is located at 46 Natoma Street, which is approximately 2.5 miles northwest of the Project Site. Overall, the Folsom PD supports 79 uniformed officers and 30 non-sworn employees divided across 5 “Beat” areas. The average response time for Priority 1 and Priority 2 service calls are 6 minutes and 12 seconds and 7 minutes and 37 seconds, respectively.

As stated above, the Project would develop 110 new one-bedroom/one-bathroom units of senior housing, which would house up to 220 residents.

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The population of the City of Folsom has increased since publication of the UWMP to an estimated 81,610 persons in January 2020, according to the California Department of Finance, Table 2: E-5 City/County Population and Housing Estimates.
This would represent approximately 0.3 percent of the current population of the City of Folsom. 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, the City’s General Plan contains Policy PFS 6.1.1, which mandates the Folsom PD to provide law enforcement services that adequately meet the needs of future development. 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 FFD. The Project Site is served by Station No. 37, located at 70 Clarksville Road, located approximately 1,000 feet southwest 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 managed landscaping limited to decorative trees, shrubs, and ground cover. Additionally, the Project is similar in height and scale to other land uses within the FFD’s service area. Further, the Project Site is not located within or adjacent to a Very High Fire Hazard Severity Zone as designated by California Department of Forestry and Fire Protection’s Fire and Resource Assessment Program.

While the 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 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 FFD prior to issuance of a building permit. With review and approval of Project plans by the FFD, the Project would not adversely impact fire protection services in the City.

Emergency Medical Services

See the Health Care and Social Services discussion, above.

References:


City of Folsom, 2035 General Plan.


| Parks, Open Space and Recreation | (2) No impact anticipated | The Project Site is located approximately 1,600 feet east of the John Kemp Community Park, 3,800 feet west of Hilcrest Park, and 3,600 feet north of Handy Family Park. These parks have a variety of amenities, including lighted baseball, softball, soccer, and lacrosse fields; lighted |
volleyball and basketball courts; picnic areas; pavilions; water features; and restrooms.

Because the Project would not result in substantial population growth, as discussed previously, the Project would not warrant construction of additional park space or result in substantial deterioration of any existing recreation facilities. Further, the Project is intended for seniors and would provide outdoor amenities on-site, such as a courtyard, patio with seating areas, bocce ball court, and a garden, in addition to indoor amenities, such as a 2,601-square-foot community room with lounge, kitchen, business center, and large screen television. Such on-site amenities would reduce the impact on municipal parks and other recreational facilities in the Project vicinity.

Additionally, the City’s General Plan 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, the City requires new commercial, industrial, multifamily residential, and single-family residential developments to pay park development impact fees or parkland dedication in-lieu fees (Folsom Municipal Code Chapter 4.10). As such, the City of Folsom implements a development impact fee program, through which it calculates fees based on a residential project’s total number of dwelling units. The Project would be required to pay development impact fees related to parks and recreation, further reducing Project-related impacts on park and recreation facilities.

In short, with the relatively small increase in population associated with the Project, and the indoor and outdoor amenities incorporated into the Project, the Project would not result in substantial adverse impacts to municipal parks and recreation resources. Therefore, no project impacts are anticipated and no mitigation is necessary.

**References:**
City of Folsom, 2035 General Plan, Parks and Recreation Element.

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<th>Transportation and Accessibility</th>
<th>(2) No impact anticipated</th>
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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 grading, paving, construction, and painting. Project-related construction activities (and construction-related traffic) would occur during daytime 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, the impacts would be temporary and would fluctuate in intensity throughout the construction day and vary throughout the overall construction duration. 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 CEQA are required to 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 Folsom 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 location, transit availability, and provision of affordable housing. Specifically, the OPR technical advisory states that low-income housing typically generates less VMT than market-rate housing. Further, 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” (page 15). The Project would involve development of 100 percent affordable residential units (with the exception of one manager’s unit). As such, the Project can be presumed to have a less than significant traffic (VMT) impact per OPR guidance. Additionally, age-restricted housing typically generates shorter trips than traditional housing because there are fewer commute trips associated with full-time jobs, which are typically the longest trips made by a household. Further, the Project’s location, close to commercial uses, would encourage walking and further reduce vehicle trips associated with the Project.

Regarding public transportation, the Project Site’s location affords multiple alternative transportation options, with sidewalks along both sides of Scholar Way and East Bidwell Street, a bus stop for Folsom Stage Line 10 on Scholar Way directly adjacent to the Project Site, and a bus stop for Folsom Stage Line 20 on Cavitt Drive approximately 340 feet to the east. As stated above, the Stage Line 10 bus line connects to Iron Point Station and Historic Folsom Station, both of which are also stops for the Sacramento Regional Transit Light Rail Gold Line, which travels into downtown Sacramento. Folsom Stage Line 20 primarily serves the residential neighborhoods on the east side of the City of Folsom. Therefore, no project impacts are anticipated and no mitigation is necessary.

References:

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

Unique Natural Features

As stated above, the Project Site is located within a fully urbanized area and is surrounded by commercial, residential, and institutional land uses. There are no unique geological features, such as caves, cliffs, rock outcroppings, canyons, waterfalls, or tree stands, 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 Project Site is currently undeveloped, it has been disturbed and contains mostly introduced annual grasses and other weedy species. Further, the Project Site is located approximately 2.7 miles north of the South Sacramento Habitat Conservation Plan area (the northern boundary of which is White Rock Road, south of US 50) and areas identified by the County...
of Sacramento as potential mitigation areas for Swainson’s hawk (an endangered species).

Therefore, because Project-related construction activities would take place on a site that has been disturbed by past grading activities, and because the Project Site is located within a fully urbanized environment that is surrounded by disturbed areas (such as sidewalks, residential buildings, commercial developments, Folsom Lake College, railroad track, a bike trail, streetlights, and major arterial streets), the Project would not impact any natural features, water resources, or geologic features. Therefore, no project impacts are anticipated and no mitigation is necessary.

**References:**

Sacramento County, South Sacramento Habitat Conservation Plan, Plan Area Map, 2019.

Sacramento County, Swainson’s Hawk Mitigation Areas Map, 2005.

U.S. Fish and Wildlife Service, National Wetlands Inventory, Wetlands near the Project Site, map generated December 22, 2020

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<thead>
<tr>
<th>Vegetation, Wildlife</th>
<th>(3) Minor Adverse Impact – May require mitigation</th>
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<td>The Project Site is located in a fully urbanized area, surrounded by existing commercial and religious land uses, as well as major roadways. The Project Site is characterized by ruderal, non-native grasses, scattered trees, and a bioswale on the eastern Project Site boundary. As discussed above in the Endangered Species Act section of this EA, the Project would not damage or destroy existing remnant or endemic plant communities or result in the disruption of wildlife, habitat alteration or removal; effects to rare, threatened, or endangered species; or the proliferation of pest species. Due to its disturbed nature, the Project Site would not support special-status species listed by the USFWS, or species listed on the California Department of Fish and Wildlife’s 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 the 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 typical avian breeding season (February 15 to August 31). Construction activities and construction-related disturbance (noise, vibration, and increased human activity) could adversely affect these</td>
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species if they were to nest in or adjacent to the Project Site. Potential effects include physical destruction of nests by construction equipment and/or nest abandonment. **Mitigation Measure WILD-01** would reduce Project-related adverse impacts to nesting birds. This mitigation measure is included below.

**Mitigation Measure WILD-01:** If ground-clearing activities occur during the typical bird nesting season (February 15 through August 31), preconstruction nesting bird surveys shall be conducted by a qualified biologist on the Project Site and within a 500-foot radius of proposed construction areas, where access is available, no more than 14 days prior to the initiation of construction. A copy of the survey must be provided to SHRA. If no nests are found, no further mitigation is required. If active nests are identified in these areas, the Project applicant shall coordinate with the City and SHRA to develop measures to avoid disturbance of active nests prior to the initiation of any construction activities, or construction could be delayed until the young have fledged. Avoidance measures may include establishment of a buffer zone and monitoring of the nest by a qualified biologist until the young have fledged the nest and are independent of the site. If a buffer zone is implemented, the size of the buffer zone shall be determined by a qualified biologist in coordination with the City and SHRA and shall be appropriate for the species of bird and nest location.

Implementation of **Mitigation Measure WILD-01** would ensure that the Project would be consistent with the MBTA and would avoid minor adverse impacts. Therefore, with implementation of **Mitigation Measure WILD-01**, no project impacts are anticipated.

**References:**


| Other Factors | None Identified. |

**Additional Studies Performed:**


Helix Environmental Planning Inc., *Initial Study and Mitigated Negative Declaration, Scholar Way Senior Apartment Community*, October 2020.


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:
The regulatory permits and approvals required to implement the Proposed Project include a Planned Development Permit from the City of Folsom for a 110-unit multifamily apartment project in the R-4 PD zone, as well as state agency permits discussed above, such as the Construction General Permit from the SWRCB.

Public Outreach [24 CFR 50.23 & 58.43]:
The Project applicant has conducted outreach in the Project vicinity as part of the City of Folsom entitlement process. Additionally, notices of entitlement applications and hearing dates were posted on-site. No inquiries or responses were received through this outreach. Further, the Planned Development Permit for the Project was approved by the City of Folsom Planning Commission at a public meeting (held virtually) on November 18, 2020. This Planning Commission meeting allowed members of the public to provide comments on the Project; however, no members of the public provided comments on the Project during this meeting. Following approval by the City of Folsom Planning Commission, a Notice of Determination was filed with the Sacramento County Clerk on November 19, 2020.

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 Project would involve construction of 109 units of affordable housing for seniors and one manager’s unit, along with related hardscape and landscape improvements. The proposed new construction would result in generation of noise and air pollution. The Project’s construction- and operation-related noise would not generate noise levels that would exceed the City’s noise standards (as outlined in Section 8.42 of the
Folsom Municipal Code) at the closest sensitive receptors (the church and single-family residences to the east). With regard to air quality, the Project would not result in short- or long-term air quality impacts, as discussed in the Clean Air section of this EA. As evaluated above, the Project would not contribute a cumulatively considerable net increase of any nonattainment criteria pollutant, and, therefore, the Project’s incremental operational impacts would not result in cumulatively adverse effects.

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 Project would involve development of 100 percent affordable residential units, 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**

As stated above, the Project Site is included on the Housing Element’s Vacant Residential Land Inventory (Table 3-A-2, January 2013), which identifies the Project Site for the development of 83 low-income housing units. The 109 units affordable to low- and very low-income units in the Project would satisfy this requirement for 83 affordable units. Therefore, because this site has been identified for placement of affordable housing, the Project is uniquely suited to the Project Site. The only other potential site identified in the Housing Element for residential development of similar size and that would support a similar number of units is a 4-acre site located 1.3 miles north of the Project Site, at the southwestern corner of the intersection of Blue Ravine Road and Oak Avenue Parkway. However, this site is partially located within a FEMA-designated Special Flood Hazard Area (zone AE), contains a large number of mature trees, is transected by overhead powerlines, and is surrounded by residential development, a church, and a skate park. Therefore, this alternative site would have greater environmental constraints given the overhead powerlines, existing habitat, and flooding issues, and it would not be well-suited for a community of seniors that would benefit from being located close to community resources and amenities (pharmacies, commercial uses, grocery stores, medical offices, etc.). Such close proximity increases walkability, reduces Project VMT and Project-related GHG emissions, and would encourage residents to connect with nearby community resources, thus reducing negative impacts associated with social isolation among seniors, as identified in the SACOG MTP/SCS. As such, the Project Site on Scholar Way is preferred over an alternative location that is not surrounded by similar community amenities and resources and that would present flooding risks to future residents, some of which may have limited mobility.

**Reduced Density Alternative**

As stated above, the Project Site is included on the Housing Element’s Vacant Residential Land Inventory (Table 3-A-2, January 2013), which identifies the Project Site for the development of 83 low-income housing units. This alternative considered for the Project would develop the 4.2-acre Project Site with 83 units of low-income housing, rather than 110 units of affordable senior housing. Reducing the development’s intensity would have a minor decrease in some environmental impacts, such as GHG emissions; however, the reduction in environmental impacts would be minimal. For example, an 83-unit development on the Project Site would still involve construction impacts relating to air quality, noise, and water quality that would be similar in scope to those proposed by the preferred alternative. Ambient noise levels on the Project Site would still exceed HUD requirements and would still require noise attenuation features for units facing East Bidwell Street; radon testing would still be required prior to project
occupation; and migratory/nesting bird surveys would still be required prior to construction activities. Constructing 83 units of affordable but non-age-restricted housing on the Project Site may result in impacts on the local school district as school-aged children could be assumed to live on-site. Additionally, non-age-restricted housing would likely result in greater impacts associated with traffic and transportation as residents may be generating more VMT by regularly commuting to work or school. This design alternative would not contribute to the goal outlined in the City’s Housing Element to encourage development of affordable housing for seniors or to use the Project Site and its proximity to community resources for senior housing, which would help them stay active, avoid social isolation, and connect to community resources. Therefore, because the Project would meet these General Plan goals and because the alternative would not substantially reduce environmental impacts as compared to the Project, the Project is the preferred alternative.

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

Under this alternative, the Project would not occur and the Project Site would remain undeveloped. As such, there would be no environmental impacts. However, the Project Site would remain as an undeveloped property zoned for residential or mixed-use development. Over time, it is possible that the vacant site would be sold to another developer and developed with market-rate housing or a mixed-use development. As discussed in the Statement of Purpose and Need for the Proposal Section, above, the SHRA has documented a persistent demand for affordable housing. Further, the SACOG MTP/SCS identifies affordable senior housing as a priority in the SACOG area, stating that locating these senior housing units close to community resources is important to reducing social isolation among seniors. The No Action Alternative would not result in the beneficial effects associated with constructing affordable housing units for seniors near community resources, such as recreational assets, commercial land uses, and medical services. Therefore, the Project is preferred over this alternative.

**Summary of Findings and Conclusions:**

With implementation of the conditions of approval adopted for this Project by the City of Folsom, which are discussed 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.

<table>
<thead>
<tr>
<th>Law, Authority, or Factor</th>
<th>Mitigation Measure</th>
</tr>
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<tbody>
<tr>
<td><strong>Contamination and Toxic Substances</strong></td>
<td><strong>Mitigation Measure CON-01:</strong> Prior to the first occupancy permit, the Project applicant shall conduct site-specific radon testing to confirm that radon levels on-site are at acceptable levels for habitation on-site. Should results of the radon testing...</td>
</tr>
</tbody>
</table>

[59]
indicate that radon levels exceed State standards for habitation, the project applicant shall follow recommended remediation procedures per the testing report prior to issuance of an occupancy permit by the City. Results from this testing shall be submitted to the City of Folsom and SHRA. A Radon Professional may conclude that testing or mitigation is not necessary based on exemptions laid out in the relevant state or ANSI-AARST radon standard. Any such justifications as to why testing or mitigation is not necessary must be provided in the Environmental Report in the form of a signed letter from the radon professional that references the appropriate standard.

### Historic Preservation

Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800

**Mitigation Measure CUL-01:** In the event that cultural resources are exposed during ground-disturbing activities, construction activities should be halted in the immediate vicinity of the discovery. If the site cannot be avoided during the remainder of construction, an archaeologist who meets the Secretary of the Interior’s Professional Qualifications Standards should then be retained to evaluate the find’s significance under the California Environmental Quality Act (CEQA) and the National Historic Preservation Act (NEPA). A report of the evaluation must be submitted to SHRA. If the discovery proves to be significant, additional work, such as data recovery excavation, may be warranted and should be discussed in consultation with the City and SHRA.

### Noise Abatement and Control

Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B

**Mitigation Measure NOI-01:** Prior to the issuance of building permits, the project applicant shall demonstrate, to the satisfaction of the City of Folsom and SHRA, that final design plans include the following for the project’s habitable areas (both living rooms and bedrooms) with a direct line-of-sight to East Bidwell Street:

- Minimum exterior wall requirement of STC 46 with a construction of standard 0.875-inch stucco over 0.5-inch shearwall on 2x6 studs with 0.625-inch Type “X” drywall.
- Minimum window requirement of STC 28 with a window construction of dual glazing window thickness 0.125-inch and 0.5-inch air gap.
- Appropriate means of air circulation and provision of fresh air shall be incorporated in the project to allow windows to remain closed for extended intervals of time so that acceptable levels of noise can be maintained on the interior.
- The building design shall include a mechanical ventilation system that meets the criteria of the International Building Code (Chapter 12, §1203.3 of the 2013 California Building Code) to ensure
| Environmental Assessment Factor: Natural Features, Vegetation, Wildlife | Mitigation Measure WILD-01: If ground-clearing activities occur during the typical bird nesting season (February 15 through August 31), preconstruction nesting bird surveys shall be conducted by a qualified biologist on the Project Site and within a 500-foot radius of proposed construction areas, where access is available, no more than 14 days prior to the initiation of construction. A copy of the survey must be provided to SHRA. If no nests are found, no further mitigation is required. If active nests are identified in these areas, the Project applicant shall coordinate with the City and SHRA to develop measures to avoid disturbance of active nests prior to the initiation of any construction activities, or construction could be delayed until the young have fledged. Avoidance measures may include establishment of a buffer zone and monitoring of the nest by a qualified biologist until the young have fledged the nest and are independent of the site. If a buffer zone is implemented, the size of the buffer zone shall be determined by a qualified biologist in coordination with the City and SHRA and shall be appropriate for the species of bird and nest location. |

**Determination:**

- **Finding of No Significant Impact** [24 CFR 58.40(g)(1); 40 CFR 1508.27]  
  The project will not result in a significant impact on the quality of the human environment.

- **Finding of Significant Impact** [24 CFR 58.40(g)(2); 40 CFR 1508.27]  
  The project may significantly affect the quality of the human environment.

Preparer Signature: [Signature] Date: 2-2-2021

Name/Title/Organization: John Bellas / Department Manager – Environmental / Michael Baker International

Certifying Officer Signature: [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).