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

Project Information

Project Name: Northview Pointe 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 composed of approximately 1.23 acres of undeveloped, previously disturbed land located approximately 270 feet north of the intersection of Northview Drive and Northfield Drive in the City of Sacramento in Sacramento County, California. The address for the Project Site is 2314 Northview Drive, Sacramento, California, Sacramento County (Assessor Parcel Numbers [APNs] 274-0232-013 and -014).

The Project Site is surrounded by an affordable senior housing development (the Eskaton Natomas Manor), a single-family residential neighborhood, and West El Camino Avenue to the north; Northview Drive, the Kingdom Hall of Jehovah’s Witnesses, and multifamily residential development to the west; an undeveloped parcel and multifamily development to the south; and a region-serving commercial center (including grocery, general store, hardware store, restaurants, and retail uses) and Northgate Boulevard to the east.

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 Northview Pointe affordable housing project (Project), which would consist of the construction of 66 units of affordable permanent supportive housing for low-income households experiencing homelessness with one additional two-bedroom unit reserved for management staff (for a Project total of 67 units). The Project has applied for project-based vouchers, but has not been awarded yet.

The Project would include indoor and outdoor community amenities, as well as a surface parking lot on the northern portion of the Project Site and landscaping on the western, eastern, and southern portions. The proposed development area has been previously disturbed/graded and is relatively flat. A Regional Location Map and a Project Location Map are provided in Figure 1 and Figure 2, respectively.

Proposed Structure

The Project would consist of a two-story structure with a total of 67 units, including one unit for use by the property manager and 66 studio units restricted to low-income households experiencing homelessness. Each studio unit would include a kitchen, full bathroom, and storage space and would enter onto open-air walkways and common areas. A common courtyard and common deck would be located in the center of the proposed structure, along with communal offices, a lounge area with bathrooms, and conference space. The residential and communal components (i.e., management areas and amenities) of the Project would be placed in a series of structures connected by covered walkways, trellises, and rooflines, giving the impression of a single two-story structure. The result is a garden-style apartment building designed around central courtyards and open spaces that allow airflow through the courtyards and breezeways. This is illustrated by the Project’s Site Plan, provided in Figure 3 and in the Project’s proposed elevations (provided in Figure 4 and Figure 5), as well as in conceptual Project renderings (provided in Figure 6a and Figure 6b). The structure would be clad in neutral-colored stucco on the north, east, and southern elevations and would include casement windows. The western building elevation, facing Northview Drive, would include multiple materials and textures to provide visual interest, such as a two-story corrugated, perforated metal screen (with stucco behind the screen) on the northwest building elevation, cement board siding, corrugated metal siding, and casement windows, which are identified in Figure 4.

The 66 affordable residential units would be located on both levels of the proposed structure on the north, east, and south sides of the building, with the western and central portions of the development reserved for community amenities, such as those detailed in the next paragraph. Each studio unit would be 372 square feet in size, while the two-bedroom, one-bathroom unit reserved for management staff would be 750 square feet in size. In total, the Project would be 31,026 square feet in size (including areas within
interior walls and excluding exterior, covered, non-enclosed areas), with 15,598 square feet of residential, office, and communal uses on the first floor and 15,428 square feet of residential uses on the second floor. The structure would include rooftop-mounted photovoltaic panels (as shown in Figure 6b), which would be screened from view by a decorative parapet that would rise to a maximum height of 23 feet and 6 inches.

The Project would include indoor community amenities, such as an on-site management office; on-site offices and conference rooms for service provision by case managers, resident services coordinators, and visiting service providers; a resident lounge/meeting room with television and seating; a community room with full kitchen, bathrooms, seating, and television; a conference room; a laundry room; a mail room; and short- and long-term bicycle parking areas. As stated above, these amenities would be concentrated in the center and the west side of the proposed structure on the first floor. Outdoor amenities would include 14 parking spaces, as well as a common deck and a common courtyard located in the center of the structure.

Parking and Circulation

As stated above, the Project would include a 14-space surface parking lot on the north side of the Project Site. Twelve of these parking spaces would be located behind a rolling gate with the remaining two parking spaces (both compliant with the Americans with Disabilities Act of 1990) located west of the gate, closer to Northview Drive. Two of the twelve spaces located behind the rolling gate would support charging of electric vehicles. The rolling gate would be located approximately 55 feet east of Northview Drive. This parking area would be paved in concrete and provide ingress and egress onto Northview Drive via a driveway at the northwest corner of the Project Site, as shown in Figure 3. A driveway and fire lane would be located on the south side of the Project Site, which would extend approximately 140 feet east of Northview Drive. The fire lane would be secured by a gate with a Knox Box located 23.75 feet east of Northview Drive.

Additionally, the Project would provide bike racks for short-term bike storage on the west side of the proposed structure near the front entrance, with an additional 34 spaces of long-term bike storage located on the southwest side of the proposed structure.

Landscaping and Lighting

As shown in the Project’s Conceptual Landscape Plan, presented in Figure 7, decorative trees, shrubs, and groundcover would be utilized throughout the Project Site. Specifically, eight shade trees would be planted within the parking area (little leaf linden); four shade and screening trees would be planted at the southeast corner of the Project Site (native valley oak and sycamore maple); and smaller decorative trees would be planted throughout the Project Site, including marina strawberry trees in the deck area and Northern California black walnut trees in the courtyard area. Upon maturity of the trees in the parking area on the north side of the Project Site, the parking area would be approximately 63 percent shaded. Additionally, one sycamore maple tree and two Northern California black walnut trees would be located on the Project Site’s Northview Drive frontage. Decorative shrubs would be placed on the east side of the Project Site, including two rows of mills glory and one row of California wildrose bushes. Decorative groundcover (California fuchsia) would be located on the northern and western Project Site frontages, while decorative grasses (soft rush) would be located in the parking area, along the building’s northern elevation, and in interior portions of the Project Site. The common courtyard area in the center of the Project Site would include three Northern California black walnut trees and turf grass (native bentgrass). Three bioswales to collect Project Site runoff would be located in the common courtyard, along the north building elevation, and on the south side of the common deck. These areas are populated with the decorative soft rush grasses discussed above and identified in the Conceptual Landscape Plan, available as Figure 7.

[3]
A total of nine existing trees are located along the Project Site’s eastern boundary. Of these nine trees, five would be protected in place and four would be removed. The five trees that would remain range in size and health and include four valley oaks and one glossy privet. Additional information about the existing trees on the Project Site is provided in the Existing Conditions and Trends section, below.

Lighting would be located throughout the Project Site, including recessed can lighting in ceilings above pathways and breezeways; surface-mounted floodlights on the second-floor trellis on the western elevation; landscape lighting in the small landscaped strip between the proposed surface parking lot and the northern Project Site boundary; overhead lights illuminating the parking area; decorative lights at the base of each tree located in the Project’s interior courtyard and deck areas; and wall-mounted security lights located 24 feet above grade on the south, east, and portions of the northern building elevations. All lighting would be from energy-efficient light emitting diode (LED) lights.

Walls and Fences

As stated above, the Project would include a rolling gate on the north side of the Project Site, which would restrict access to the surface parking lot. A security gate with a Knox Box would restrict access to the proposed fire lane on the south side of the Project Site. The Project would include a 6-foot-high cedar wood fence on the north, east, and southern Project Site boundaries that would connect to the security gate and rolling gate on the western building elevations, thus securing the entire proposed structure and parking area.

Construction

Project construction would occur over approximately 16 months, anticipated to begin in October 2022. Construction of the Project would include the following phases: grading, paving, building construction, and architectural coating application. It is anticipated that the Project would be completed and operational by June 2024. Grading would involve approximately 1,400 cubic yards of cut and 1,100 cubic yards of fill, which would result in approximately 300 cubic yards of soil export.

Approvals

City of Sacramento approvals required for the Proposed Project include site plan and design review for construction of a 67-unit affordable housing development in an R-3-R Zone (zoning is discussed in the Existing Conditions and Trends section, below).
FIGURE 1
Regional Location Map

Legend
★ Project Site

Source: ESRI World Imagery Service
FIGURE 3
Proposed Site Plan

Source: Brooks + Scarpa Architects, Inc., May 2021

Northview Drive
FIGURE 4
East and West Building Elevations

West Building Elevation

- Rolling gate at parking area
- Stucco behind perforated metal screen
- Corrugated metal siding
- Cement board siding
- 23 feet 6 inches top of parapet
- Gate at fire lane

East Building Elevation

- Existing Tree
- Breezeway
- Exterior stairs
- 23 feet 6 inches top of parapet

Source: Brooks + Scarpa Architects, Inc., May 2021
FIGURE 5
North and South Building Elevations

Source: Brooks + Scarpa Architects, Inc., May 2021
Bird's Eye Conceptual Rendering of Project Site

Source: Brooks + Scarpa Architects, Inc., May 2021
FIGURE 7
Conceptual Landscape Plan

PLANT LEGEND

- LITTLE LEAF LINDEN
- MILLS GLORY
- CALIFORNIA WILDROSE
- SYCAMORE MAPLE
- NATIVE VALLEY OAK
- MARINA STRAWBERRY TREE
- NORTHERN CALIFORNIA BLACK WALNUT
- RED BEARDTONGUE
- CALIFORNIA FUCHSIA
- SOFT RUSH
- NATIVE BENT GRASS

Source: Design Studio Landscape Development, LLC, 2021

Northview Drive

Existing Trees

Existing Trees
**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 people living in Sacramento City and County who do not have incomes or financial means to afford conventional, market-rate residential units. Specifically, the affordability levels of the 66 proposed affordable residential units are shown in **Table 1**, below.

**Table 1**  
Proposed Unit Affordability Levels

<table>
<thead>
<tr>
<th>Unit Size</th>
<th>25 % AMI</th>
<th>30 % AMI</th>
<th>40 % AMI</th>
<th>50 % AMI</th>
</tr>
</thead>
<tbody>
<tr>
<td>Studio</td>
<td>4</td>
<td>30</td>
<td>23</td>
<td>9</td>
</tr>
</tbody>
</table>

Note: AMI = area median income. According to the California Department of Housing and Community Development, the AMI for a family of four in Sacramento County in 2021 is $91,110.\(^2\)

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

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

As stated above, the Project Site is composed of approximately 1.23 acres of undeveloped, previously disturbed land located approximately 270 feet north of the intersection of Northview Drive and Northfield Drive in the City of Sacramento, California. The Project Site consists of two parcels (APNs 274-0232-013 and -014) that are rectangular in shape except for the Project Site’s slightly curved western border with Northview Drive. The Project Site is characterized by managed (i.e., mowed) non-native grasses and nine trees located along the site’s eastern boundary that vary in size, species, and health. Of these nine trees, four would be removed by the Project. The trees proposed for removal include two dead glossy privet trees, one holly oak with severe fire damage, and one English walnut that has major structural and health problems. The remaining five trees would be incorporated into the Proposed Project, as described above. There are no existing improvements on the Project Site apart from a chain-link security fence that surrounds the site. The Project Site’s Northview Drive frontage is improved with curbs and gutters, as well as sidewalks on the east and west sides of the street.

While the Project Site has not been developed, it has been previously disturbed by past uses. Specifically, the Project Site was used for agricultural purposes from 1937 to at least 1964. According to historical aerial imagery, the commercial development to the east was constructed between 1972 and 1984, while the multifamily residential development to the south and the church development to the west were developed between 1984 and 1993. The senior housing complex to the north was constructed between 2002 and 2005.

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2 California Department of Housing and Community Development, State income limits for 2021, April 2021.
The Project Site has a General Plan designation of Suburban Neighborhood High Density and a zoning designation of R-3-R (multi-family). The second ‘R’ in the R-3-R zoning designation refers to a section that has been removed from the Sacramento City Code (SCC). In short, development on the entire Project Site is governed by R-3 design and construction standards. The Project Site is located within the South Natomas Community Planning Area, which is one of the 10 community plans that were drafted as part of the Sacramento 2035 General Plan process. Finally, the Project Site is located within the South Natomas FBA fee district, which collects fees from developers to support transportation and public facilities projects in the South Natomas area of the City.

**Funding Information**

The Proposed Project would be funded, in part, through the HUD HOME Investment Partnership program (HOME funds). The Project has applied for project-based vouchers, but has not been awarded yet.

<table>
<thead>
<tr>
<th>Grant Number</th>
<th>HUD Program</th>
<th>Funding Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>M21MC060210</td>
<td>HOME Investment Partnership</td>
<td>$2,500,000</td>
</tr>
<tr>
<td>N/A</td>
<td>Project-Based Vouchers</td>
<td>$9,443,520 (66 20-year vouchers)</td>
</tr>
</tbody>
</table>

**Estimated Total HUD Funded Amount:** $11,943,520  
**Estimated Total Project Cost** (HUD and non-HUD funds) [24 CFR 58.32(d)]: $27,595,255

**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>
</table>

**STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6**

<table>
<thead>
<tr>
<th>Airport Hazards</th>
<th>Yes</th>
<th>No</th>
<th>Compliance determinations</th>
</tr>
</thead>
<tbody>
<tr>
<td>24 CFR Part 51</td>
<td></td>
<td></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 the record 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...</td>
</tr>
</tbody>
</table>
Airports designated by the Federal Aviation Administration (FAA) as commercial airports in the National Plan of Integrated Airports are considered civilian airports subject to HUD Regulation 24 CFR 51D.

The closest military airport to the Project Site is the Coast Guard Air Station Sacramento at McClellan Airfield, located approximately 4.9 miles (25,870 feet) northeast of the Project Site. The closest civilian airport is the Sacramento McClellan Airport, located approximately 4.9 miles (25,870 feet) northeast of the Project Site. The next nearest civilian airport is Rio Linda Airport, located approximately 5.0 miles (26,400 feet) northeast 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:**


<table>
<thead>
<tr>
<th>Coastal Barrier Resources</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]</td>
<td>☒</td>
<td>☐</td>
</tr>
</tbody>
</table>

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 US Fish and Wildlife Service within the State of California. Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary.

**References:**


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

Section 202 of the Flood Disaster Protection Act of 1973 (42 USC 4106) requires that projects receiving federal assistance and located in an area identified by the Federal Emergency Management Agency (FEMA) as being within a Special Flood Hazard Areas (SFHA) be covered by flood insurance under the National Flood Insurance Program.

According to FEMA’s Flood Insurance Rate Map for the Project area (06067C0176J), the Project Site is located within Zone A99, which means the Project Site is subject to inundation by the one-percent-annual-chance flood event, but will ultimately be protected upon completion of an under-construction federal flood protection system. Zone A99 is considered an SFHA and, as such, would

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require flood insurance. Therefore, the Project would be required to maintain a flood insurance amount of coverage that is at least equal the total Project cost or the maximum coverage limit of the National Flood Insurance Program, whichever is less. This requirement is described as Mitigation Measure FI-1, outlined below.

With implementation of Mitigation Measure FI-1, there would be no further analysis necessary.

**Mitigation Measure FI-1**

Prior to expenditure of HUD funding, the Project developer shall provide a copy of the flood insurance policy declaration or a paid receipt for the current annual flood insurance premium and a copy of the application for flood insurance. The Project Developer shall maintain flood insurance coverage, which shall be continued for the life of the building, irrespective of the transfer of ownership, or until the Project Site is removed from a Special Flood Hazard Area, as determined by FEMA. The amount of flood insurance coverage must at least equal the total project cost or the maximum coverage limit of the National Flood Insurance Program, whichever is less.

**References:**

Federal Emergency Management Agency, Flood Insurance Rate Map 06067C0176J.

| STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5 |
|---|---|
| **Clean Air** | Yes No |
| Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93 | ☑ |
| The analysis in this section is informed, in part, by the Air Quality Technical Memorandum prepared for this Project by Michael Baker International, June 2021. This technical memorandum is 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 within the Sacramento Valley Air Basin |
The Sacramento Metropolitan Air Quality Management District (SMAQMD) has jurisdiction in the Basin, which has a history of recorded air quality violations and is an area where both state and federal ambient air quality standards are exceeded. Areas that meet ambient air quality standards are classified as attainment areas, while areas that do not meet these standards are classified as nonattainment areas. The SMAQMD is required, pursuant to the federal Clean Air Act, to reduce emissions of the air pollutants for which the Basin is in nonattainment. The Basin is designated a nonattainment area for the federal and state 8-hour ozone standard, federal 24-hour particulate matter 2.5 microns in diameter or less (PM$_{2.5}$) standard, and the state annual particulate matter 10 microns in diameter or less (PM$_{10}$) standard. As such, under the Clean Air Act, the SMAQMD has adopted federal attainment plans for ozone, PM$_{10}$, and PM$_{2.5}$. The Sacramento Regional 2008 NAAQS 8-Hour Ozone Attainment and Reasonable Further Progress Plan, which addresses attainment of the federal 8-hour ozone standard, and the 2015 Triennial Report and Plan Revision are the current plans required by the US Environmental Protection Agency (USEPA) and California Air Resources Board and issued by the SMAQMD to meet attainment. These plans need to demonstrate reasonable progress toward attainment as required by the SIP and the California Clean Air Act.

Per guidelines set forth by HUD, because the Project Site is in a nonattainment area for ozone, PM$_{2.5}$ and PM$_{10}$, the Project must either demonstrate that estimated emissions levels for the Project do not exceed de minimis emissions levels for the nonattainment or maintenance level pollutants or demonstrate conformity with the SIP. A project is shown to conform with the SIP if its criteria pollutant emissions remain below the local air district’s significance thresholds and it is consistent with the local air quality attainment plan.

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

**Construction Emissions**

The Project involves construction activities associated with grading, building construction, paving, and architectural coating applications. The project would be constructed over approximately 16 months. Exhaust emission factors for typical diesel-powered heavy equipment are based on the California Emissions Estimator Model Version 2020.4.0 (CalEEMod) program defaults. Variables factored into estimating the total construction emissions include the level of activity, length of construction period, number of pieces and types of equipment in use, site characteristics, weather conditions, number of construction personnel, and the amount of materials to be
transported on- or off-site. The analysis of daily construction emissions was prepared using CalEEMod. Short-term construction-related emissions, along with SMAQMD significance thresholds, are displayed in Table AQ-1, below. Reactive organic gases (ROG) and nitrogen oxides (NOx) are considered ozone precursors because they react with sunlight to create photochemical smog, or ozone. Therefore, ROG and NOx are included in the analysis of construction emissions as they contribute to ozone levels in the atmosphere.

<table>
<thead>
<tr>
<th>Pollutant (pounds/day)</th>
<th>ROG</th>
<th>NOx</th>
<th>PM10</th>
<th>PM2.5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maximum daily emissions (lbs/day)</td>
<td>21.46</td>
<td>37.16</td>
<td>4.96</td>
<td>3.02</td>
</tr>
<tr>
<td>SMAQMD Thresholds</td>
<td>N/A</td>
<td>85</td>
<td>80</td>
<td>82</td>
</tr>
<tr>
<td>Threshold Exceeded?</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Annual Emissions (tons/year)</td>
<td>0.64</td>
<td>1.62</td>
<td>0.13</td>
<td>0.08</td>
</tr>
<tr>
<td>EPA De Minimis Thresholds</td>
<td>25</td>
<td>25</td>
<td>100</td>
<td>100</td>
</tr>
<tr>
<td>Threshold Exceeded?</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
</tbody>
</table>

Notes:
1. Emissions were calculated using CalEEMod, version 2020.4.0.
2. Modeling assumptions include compliance with SMAQMD Basic Construction Emission Control Practices/Best Management Practices which requires the following: properly maintain mobile and other construction equipment; water exposed surfaces two times daily; cover or maintain at least two feet of free board space on haul trucks; use wet power vacuum street sweepers to remove any visible trackout mud or dirt; and limit speeds on unpaved roads to 15 miles per hour.

Fugitive Dust

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

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

Project-related construction activities would comply with the SMAQMD-required best available control technology (BACT) and best management practices (BMPs), which include SMAQMD Rule 403. SMAQMD Rule 403 requires that excessive fugitive dust emissions be controlled by regular watering or other dust prevention measures. Adherence to SMAQMD regulations would greatly reduce PM$_{10}$ and PM$_{2.5}$ concentrations. Such reductions are accounted for in the modeling results provided in Table AQ-1, which shows that emissions of PM$_{10}$ and PM$_{2.5}$ would be less than the SMAQMD’s designated significance thresholds as well as the USEPA de minimis thresholds during construction.

**Construction Equipment and Vehicle Exhaust**

Exhaust emissions (e.g., NO$_x$) from construction activities include emissions associated with the transport of machinery and supplies to and from the Project Site, emissions produced on-site as the equipment is used, and emissions from trucks transporting materials to/from the Site. As presented in Table AQ-1, construction equipment and worker vehicle exhaust NO$_x$ emissions would be below the established SMAQMD thresholds and USEPA de minimis thresholds.

**Construction ROG Emissions**

In addition to gaseous and particulate emissions, the application of asphalt and surface coatings creates ROG emissions, which are ozone precursors. The SMAQMD has not established thresholds for ROG emissions during construction. ROG emissions associated with the Project would not exceed USEPA de minimis thresholds and the impacts would be less than significant, as displayed in Table AQ-1.

**Total Daily Construction Emissions**

In summary, and as displayed in Table AQ-1, construction-related emissions of ROG, NO$_x$, PM$_{10}$, and PM$_{2.5}$ are all below SMAQMD significance thresholds and USEPA de minimis thresholds.

**Operational Emissions**

Long-term operational air quality impacts associated with the Project consist of mobile source emissions generated from Project-
related traffic and emissions from area and energy sources. Table AQ-2, below, presents anticipated Project operation emissions.

### Table AQ-2
Long-Term Operational Air Emissions

<table>
<thead>
<tr>
<th>Emissions Source</th>
<th>Pollutant (lbs/day)</th>
<th>ROG</th>
<th>NOx</th>
<th>PM10</th>
<th>PM2.5</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Summer Emissions</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Area Source Emissions</td>
<td>1.83</td>
<td>0.06</td>
<td>0.03</td>
<td>0.03</td>
<td></td>
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<tr>
<td>Energy Emissions</td>
<td>0.02</td>
<td>0.20</td>
<td>0.02</td>
<td>0.02</td>
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<tr>
<td>Mobile Emissions</td>
<td>1.79</td>
<td>1.75</td>
<td>2.97</td>
<td>0.81</td>
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<tr>
<td><strong>Total Emissions</strong></td>
<td>3.65</td>
<td>2.01</td>
<td>3.02</td>
<td>0.85</td>
<td></td>
</tr>
<tr>
<td>SMAQMD Threshold</td>
<td>65</td>
<td>65</td>
<td>80</td>
<td>82</td>
<td></td>
</tr>
<tr>
<td><strong>Threshold Exceeded? (Y/N)</strong></td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td></td>
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<tr>
<td><strong>Winter Emissions</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Area Source Emissions</td>
<td>1.83</td>
<td>0.06</td>
<td>0.03</td>
<td>0.03</td>
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<tr>
<td>Energy Emissions</td>
<td>0.02</td>
<td>0.20</td>
<td>0.02</td>
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<tr>
<td>Mobile Emissions</td>
<td>1.41</td>
<td>2.03</td>
<td>2.97</td>
<td>0.81</td>
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<td><strong>Total Emissions</strong></td>
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<td>2.29</td>
<td>3.02</td>
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<td>SMAQMD Threshold</td>
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<td>65</td>
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<td></td>
</tr>
<tr>
<td><strong>Threshold Exceeded? (Y/N)</strong></td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td><strong>Project Annual Emissions (tons/year)</strong></td>
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<tr>
<td>Area Source Emissions</td>
<td>0.33</td>
<td>0.01</td>
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<td>Energy Emissions</td>
<td>&lt;0.01</td>
<td>0.04</td>
<td>&lt;0.01</td>
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<tr>
<td>Mobile Emissions</td>
<td>0.24</td>
<td>0.31</td>
<td>0.47</td>
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<tr>
<td><strong>Total Emissions</strong></td>
<td>0.57</td>
<td>0.35</td>
<td>0.47</td>
<td>0.13</td>
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<td>USEPA De Minimis Threshold</td>
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<td>100</td>
<td>100</td>
<td></td>
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<tr>
<td><strong>Threshold Exceeded? (Y/N)</strong></td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td></td>
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</tbody>
</table>

Notes:
1. Emissions were calculated using CalEEMod, version 2020.4.0.
2. The numbers may be slightly off due to rounding.

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

### Mobile Source Emissions

Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, ROG, NOx, PM10, PM2.5, and sulfur oxides are all pollutants of regional concern; however, carbon monoxide tends to be a localized pollutant, dispersing rapidly at the source. According to CalEEMod default trip generation rates, the Project would generate approximately 490 daily trips on weekdays, 545 daily trips on Saturdays, and 421 daily trips on Sundays. It is worth noting that these trip generation rates calculated in CalEEMod are for a market-rate, low-rise apartment land use. While the Project would consist of a low-rise residential building, the nature of the Project being affordable housing and having only 14 parking spaces provided on-site (meaning that few residents would have personal vehicles) means that the actual trip
generation for the Project would be much lower than these estimates. This is because affordable housing has been known to result in fewer trips than market-rate housing, according to the California Office of Planning and Research. Therefore, using the trip generation rate for market-rate housing when estimating Project-generated vehicle trips provides a conservative analysis, as actual Project-related trip generation would likely be much less. Even with this conservative calculation of anticipated Project-generated vehicle trips, emissions generated by vehicle traffic associated with the Project would not exceed established SMAQMD thresholds or USEPA de minimis thresholds, as shown in Table AQ-2. Impacts from mobile source air emissions would be less than significant.

Area and Energy Source Emissions

In addition to mobile source emissions, Table AQ-2 shows area source and energy emissions. Area source emissions would be generated from consumer products, architectural coatings, and landscaping. Energy source emissions would be generated as a result of electricity usage associated with the Proposed Project. As shown in Table AQ-2, area source and energy source emissions from the Proposed Project would not exceed SMAQMD thresholds or USEPA de minimis thresholds for ROG, NO\textsubscript{X}, PM\textsubscript{10}, or PM\textsubscript{2.5}.

Conclusion

As discussed above, the Project would not generate emissions exceeding SMAQMD or USEPA de minimis thresholds during Project construction and operation. Therefore, no adverse effect would result from the Proposed Project, the Proposed Project would be consistent with HUD’s guidance on air quality, and no formal compliance steps or mitigation are required.

References:

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


Sacramento Metropolitan Air Quality Management District, Guide to Air Quality Assessment in Sacramento County, December 2009.


<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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</table>

The Coastal Zone Management Program (CZMP) is authorized by the Coastal Zone Management Act (CZMA). Projects that can affect a coastal zone must be carried out in a manner consistent with the state CZMP under Section 307(c) and (d) of the CZMA.

The Project does not require state review under the CZMA as the City of Sacramento 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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</table>

HUD policies state that all property proposed for use in HUD programs shall be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of occupants or conflict with the intended use of the property. Further, an environmental review of residential properties shall include an evaluation of previous uses of the site and other evidence of contamination on or near the site, to ensure that future residents of proposed site are not adversely affected by the hazards.

Locations of potential toxic substances and contamination in California are identified by the California Department of Toxic Substances Control (DTSC) and the State Water Resources Control Board. There are no hazardous waste clean-up sites listed by the DTSC within one-half mile (2,640 feet) of the Project Site. The State Water Resources Control Board’s GeoTracker database identifies four leaking underground storage tank clean-up sites located within one-half mile of the Project Site. All four of these sites are associated with existing and former gasoline stations located at the intersection of West El Camino Avenue and Northgate Boulevard, approximately 1,000 feet northeast of the Project Site. The cleanup processes at all four of these cleanup sites have been completed, with the State Water Resources Control Board listing each cleanup site as “case closed.” Given that the cleanup has been completed at each of these sites, these sites would not negatively impact future residents of the Project.

Further, a Phase I Environmental Site Assessment (ESA) completed for the Project by Partner Engineering and Science, Incorporated, on May 12, 2020, did not identify any recognized environmental conditions, controlled recognized environmental conditions, or historic recognized environmental conditions on the Project Site. As stated above, the Project Site was historically used for agricultural purposes. As such, there is a potential that agricultural-related chemicals such as pesticides, herbicides, and fertilizers may have been used and stored on-site. Previous Project Site management activities likely disturbed near-surface soils (where residual...
agricultural chemical concentrations would have most likely been present, if at all). These variables serve to reduce the potential for exposure to residual agricultural chemicals (if any). Therefore, the Phase I ESA concluded that the possible former use of agricultural chemicals is not expected to represent a significant environmental concern at this time.

Because there is no evidence of toxic substances on or near the Project Site, the Project Site would not have any environmental conditions of concern that would preclude the use of the Project Site as proposed. Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary.

References:

<table>
<thead>
<tr>
<th>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</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 US Fish and Wildlife Service identifies the giant garter snake (threatened) (*Thamnophis gigas*), California red-legged frog (threatened) (*Rana draytonii*), California tiger salamander (threatened) (*Ambystoma californiense*), Delta smelt (threatened) (*Hypomesus transpacificus*), valley elderberry longhorn beetle (threatened) (*Desmocerus californicus dimorphus*), vernal pool fairy shrimp (threatened) (*Branchinecta lynchii*), and vernal pool tadpole shrimp (endangered) (*Lepidurus packardi*) 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 July 8, 2021).

The giant garter snake is a threatened species that inhabits agricultural wetlands and other waterways. Further, amphibians, fish, and crustaceans all require sources of water (at least seasonally in the case of crustaceans) for their habitat. The valley elderberry
longhorn beetle also requires elderberry plants along rivers or streams for its habitat. Due to the Project Site’s lack of standing, seasonal, or running water, the Project Site would not be a viable habitat for any of these threatened or endangered species.

Additionally, the IPaC report did not find any critical habitat within the Project Site. Project-related grading and construction activities would take place on a site that has been previously disturbed by past agricultural uses and is completely surrounded by existing residential and other suburban land uses. Because the Project Site is located within a fully developed environment that is surrounded by disturbed areas (such as a sidewalk, multifamily residential land uses, roadways, and institutional land uses), implementation of the Proposed Project would not result in the loss of habitat utilized by any of the endangered or threatened species identified above. However, the Project Site does contain several mature trees, varying in size, species, and condition, which may provide shelter for migratory birds protected under the Migratory Birds Treaty Act. Discussion of the Proposed Project’s impact on migratory birds and related habitat is provided in the Natural Features section, below.

The Project Site is within the Natomas Basin Habitat Conservation Plan (NBHCP), which was created as a requirement of the Endangered Species Act and designed to support applications for federal permits under Section 10(a)(1)(B) of the Endangered Species Act. The NBHCP is also intended to serve as an application for incidental take permits under state law pursuant to Section 2081(b) of the California Fish and Game Code. The NBHCP applies to the 53,537-acre area encompassed by the levees surrounding the Natomas Basin, located in the northern portion of Sacramento County and the southern portion of Sutter County. The Basin contains incorporated and unincorporated areas within the jurisdictions of the City of Sacramento, Sacramento County, and Sutter County. The Project Site is located within the southern, urbanized portion of the NBHCP area. As shown in Figure 8 of the NBHCP, there are no grasslands, oak groves, ponds, riparian areas, or tree groves in close proximity to the Project Site. Further, as shown in Figures 9 through 14 of the NBHCP, the Project Site and surrounding area is classified as urban land, which does not show any recorded incidences of the endangered and threatened species identified above. However, there is one record of a Swainson’s hawk (which is listed as a threatened species by the State of California) occurring approximately one-half mile west of the Project Site. Swainson’s hawk is further discussed in the Natural Features section, below.

Because there are no incidences of federally protected species occurring on the Project Site, per the NBHCP, and given the lack of natural habitat on the Project Site, the Project would have no effect on endangered or threatened species or critical habitat. Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary.
Explosive and Flammable Hazards

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<th>Yes</th>
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The Project Site is currently undeveloped and characterized by managed non-native grasses. The Project would include development 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.

The USEPA identifies two locations within one-half mile that are in the Resource Conservation and Recovery Act (RCRA) system, which is an inventory of all generators, transporters, treaters, storers, and disposers of hazardous materials and waste. These locations include the Harbor Freight hardware store site located at 2361 Northgate Boulevard, which is listed as a small quantity hazardous waste/material generator, and the Chevron/Seven-Eleven convenience store located at 2449 Northgate Boulevard, which is classified as a hazardous waste generator. Upon review of aerial photography of these facilities, aboveground storage tanks of more than 100-gallon capacity do not appear on these sites. Further, the above described land uses are minor users and storers of hazardous wastes and materials and, therefore, would not represent a significant threat to Project occupants.

Additionally, per the National Pipeline Mapping System maintained by the US Department of Transportation, the nearest gas transmission pipeline is located approximately 870 feet north of the Project Site, within the right-of-way of West El Camino Avenue, which turns north and runs underneath Northview Drive. There are no hazardous liquid pipelines, liquid spill accidents, or gas release incidences within the immediate vicinity of the Project Site. Because the Project would not involve physical disturbance beyond the boundaries of the Project Site, the Project would not result in ground disturbance within the immediate vicinity of this gas transmission pipeline. In short, the Project Site and the immediate surrounding area are free of explosive and flammable hazards.
hazards, as well as other hazardous materials, contamination, toxic chemicals, gases, and radioactive substances that could affect health or safety, or conflict with the intended use of the Project Site.

References:
Google Earth, map data June 30, 2021.
USEPA, NEPA Assist Map of RCRA sites near Project Site, map generated June 30, 2021.

<table>
<thead>
<tr>
<th>Farmlands Protection</th>
<th>Yes</th>
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<tr>
<td>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</td>
<td>☑</td>
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</tr>
<tr>
<td>Federal projects are subject to Farmland Protection Policy Act requirements if they may irreversibly convert farmland to a nonagricultural use. The Proposed Project would involve construction of 66 units of affordable housing, with an additional manager’s unit, on the Project Site. While the Project Site has been used for agricultural purposes in the past, agricultural uses have not been present on the site for over 50 years. Further, the Project Site has been classified by the California Department of Conservation as Urban and Built-Up Land. Land classified by the State of California as farmland of local importance is located 1,500 feet south of the Project Site south of Arden Garden Connector; however, this land is bisected by overhead electrical transmission lines and is part of the American River Parkway, managed by Sacramento County Regional Parks. Therefore, it would not be used for agricultural purposes. Further, the Project Site would not result in substantial physical impacts beyond the boundaries of the Project Site, and would not impact any prime farmland, unique farmland, or farmland of local importance, as designated by the California Department of Conservation. Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary.</td>
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References:
California Department of Conservation, California Important Farmland Finder, map generated on June 22, 2021.

<table>
<thead>
<tr>
<th>Floodplain</th>
<th>Yes</th>
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<tbody>
<tr>
<td>Compliance with Executive Order 11988, Floodplain Management, is required if a project involves property acquisition, land</td>
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</table>
management, construction, or improvement within a 100-year floodplain or a "critical action" within a 500-year floodplain. As stated above, the Project Site is located within an SFHA and, therefore, requires completion of the HUD 8-Step Process. HUD’s 8-Step Process exists to determine whether there are practical alternatives to locating a HUD-supported project in a floodplain and provides the public an opportunity to comment on proposed actions that are taking place within a floodplain.

Because the Project Site is located within Zone A99, Special Flood Hazard Area, as designated by FEMA, and because none of the exceptions provided in Section 24 CFR 55.12(c) apply to the Project, the SHRA is required to complete the 8-Step Process for the Project. The 8-Step Process was completed and documented in an 8-Step Process report, prepared by Michael Baker International (August 2021) and involves a detailed description of consistency with noticing requirements and an evaluation of Project alternatives. This alternatives analysis is also provided in the Alternatives section of this Environmental Assessment.

In short, the SHRA determined through the 8-Step Process that there is no practicable alternative to locating the Project in the floodplain. This is due to: 1) the location of the Project being entirely within the 100-year floodplain; 2) the limited number of available project sites outside of SFHA areas that would meet project goals; 3) the desire to provide low-income residential housing for residents of the City and County of Sacramento; and 4) the ability to mitigate and minimize impacts on human health, public property, and floodplain values through compliance with local and state development regulations. With completion of the 8-Step Process, there are no formal compliance steps or mitigation required and no further analysis is necessary.

**References:**

Federal Emergency Management Agency, Flood Insurance Rate Map 06067C0176J.


<table>
<thead>
<tr>
<th>Historic Preservation</th>
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</thead>
<tbody>
<tr>
<td>National Historic Preservation Act of 1966, particularly</td>
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</table>

The National Historic Preservation Act (NHPA) directs each federal agency, and those tribal, state, and local governments that assume federal agency responsibilities, to protect historic properties and to avoid, minimize, or mitigate possible harm that may result from agency actions. The review process, known as Section 106 review, is detailed in 36 CFR Part 800. As part of required compliance with Section 106 of the NHPA, Michael Baker International prepared a Historic Property Identification Memorandum, which details the
sections 106 and 110; 36 CFR Part 800

records and literature searches conducted for the project, Native American consultation process, archaeological field study, and archaeological sensitivity assessment to determine whether the project could result in adverse effects to historic properties. The following analysis is based on the analysis provided in the above-mentioned memorandum and includes a summary of the correspondence with tribes and the California Office of Historic Preservation (OHP).

**Background Research**

On May 21, 2021, Michael Baker International conducted a records search at the North Central Information Center (NCIC; File No. SAC-21-104). The records search included the area of potential effect (APE) and a quarter-mile radius. The NCIC, as part of the California Historical Resources Information System, California State University, Sacramento, an affiliate of the OHP, is the official state repository of cultural resources records and reports for Sacramento County. The full list of resources reviewed as part of this records search is available in the Historic Property Identification Memorandum prepared for this Project, which is available in the Environmental Review Record.

One previously recorded cultural resource was identified as overlapping with the APE. This resource is the Reclamation District No. 1000 (also known as RD 1000) and is a rural historic landscape district associated with the history of reclamation and flood control within the Sacramento Valley. RD 1000 was officially created by the California State legislature on April 8, 1911, and was the largest flood control work project in the United States at the time it was implemented. The district’s boundaries are generally the Cross Canal’s northern edge on the north, the eastern edge of the Sacramento River on the west, the eastern edge of the Natomas East Main Drainage Canal on the east, and the southern edge of the Natomas East Main Drainage Canal on the south. The APE is within the district near the district’s southeastern boundary. The APE is located in an urbanized area of the City of Sacramento, and within an area determined ineligible and non-contributing to the RD 1000.

No other cultural resources were identified as immediately adjacent to the APE, and 17 cultural resources were identified within a quarter mile of the APE. None of these resources are designated as historic, apart from one resource identified at 2108 Northgate Boulevard (approximately 0.25 miles away from the Project Site), whose historic property designation is unknown. Further, 21 cultural resources studies have previously been completed within one-quarter mile of the Project Site; however, none of these studies include the Project Site within their boundaries or identify historic properties within the Project Site.

Michael Baker International also conducted a literature review of maps, aerial photography, and historical and archaeological information about the APE. The APE is located on an elevated area above the American River flood basin approximately 270 meters
from the northern riverbank. Before the early and mid-twentieth century levee projects, the American River Basin included seasonal marshland that flooded from the nearby Sacramento River during heavy winter storms. The American River provided rich flora and fauna resources for prehistoric inhabitants of the area. Areas suitable for permanent human occupation were elevated areas along the river, and topographic high spots scattered among the marshes, such as the APE. Native peoples traditionally lived in villages along the Sacramento and American rivers, and on ridges, knolls, and terraces above the streams. The confluence of the American and Sacramento Rivers is the approximate border between the Nisenan, Patwin, and Miwok peoples. The APE is within the territory of the Nisenan, who spoke one of three languages in the Maiduan language family. Though outside the NCIC records search radius for this undertaking, two archaeological sites in the vicinity of the APE are well known and have been documented beneath recent (Holocene age) sediment, including a site near Sand Cove Park and a site near Discovery Park between 0.5 miles and 4 miles west of the Project Site. The review of historical maps and aerial photographs indicates the APE is located on land which was formerly part of Rancho del Paso.

Pedestrian Survey

An intensive archaeological pedestrian survey of the APE was conducted on May 28, 2021. Transects were spaced at 10 meters. Photographs were taken of the APE and location information for each photograph was recorded. Ground visibility ranged between 10 percent and 60 percent. No native soil was observed. The fills consisted of light brown colluvial silt clay which showed evidence of discing for vegetation abatement or agriculture. Inclusions ranged from fine gravels to large cobbles between 5 and 10 percent and included igneous rock and gravel fill. The slope ranged from 0 to 2 percent and the aspect was open. Vegetation consisted of sparse oak along the east side of the property and various non-native grasses that had recently been mowed throughout the property. Disturbances include landscaping, grading, bioturbation, and trash dumping. No cultural resource or historic properties were identified within the APE.

Effects Analysis for RD 1000

Pursuant to 36 CFR 800.5(a)(1–2), an adverse effect on a historic resource includes any direct or indirect effect that may alter characteristics of a historic property that qualify the property for listing in the NRHP. Adverse effects diminish the integrity of a historic property’s location, design, setting, materials, workmanship, feeling, or association.

RD 1000 consists of a rural historic landscape district with various contributing features, including large blocks of fields, levees, canals, and roads. In 1994, the State Historic Preservation Officer (SHPO) determined RD 1000 eligible for listing in the NRHP at the local level of significance under Criterion A for its significance in reclamation within the Sacramento River Basin. As stated above, the
APE is within an urbanized area near the southeastern edge of the district that was determined to be non-contributing to the district. A finding of no effect is appropriate for RD 1000 because the Project is located within a non-contributing area of RD 1000 and would not result in physical destruction or damage; alteration; removal from location; change of use, or change of physical features within the property’s setting that contribute to its historic significance; introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s significant historic features; neglect; or property transfer, lease, or sale out of federal ownership, as defined in the Criteria of Adverse Effect at 36 CFR §800.5(a)(2)(i-vii).

Archaeological Sensitivity Analysis

Sensitivity for buried archaeological historic properties is high. A detailed review of the geoarchaeological sensitivity of the Sacramento and American River Basins conducted for the nearby Sacramento and Fairburn Water treatment plants found that locations such as raised areas with Holocene-aged alluvial formation soil and landforms have a high sensitivity for buried archaeological deposits. The APE displays similar aged soil at a similar geomorphic arrangement, in direct proximity to the American River. The lack of development in the APE indicates that the subsurface is likely natural and therefore has a high potential to contain buried archaeological deposits.

Native American Consultation

On May 24, 2021, Michael Baker International sent a letter describing the Proposed Project to the Native American Heritage Commission (NAHC) in Sacramento, asking the commission to review the Sacred Lands File for any Native American cultural resources that might be affected by the Project. Also requested were the names of Native Americans who might have information or concerns about the APE. Per HUD’s guidelines, consultation invitations were sent via email on May 25, 2021, to federally recognized tribes identified in the HUD Tribal Directory Assessment Tool for Sacramento County.

On June 28, 2021, the NAHC responded via email and stated that a search of the Sacred Lands File provided positive results, and recommended contacting the United Auburn Indian Community of the Auburn Rancheria (UAIC) for more information. The NAHC also provided a list of Native American contacts. Additional consultation invitations were sent via email on June 29, 2021, to the Native American tribes provided by the NAHC.

On June 29, 2021, the Wilton Rancheria responded, stating that the Project area is “very sensitive for cultural resources” and that the “Tribe would like to consult.” Additionally, on July 2, 2021, the UAIC responded, stating that the Project is on sacred land with burials present. The UAIC asked to consult with the lead agency, collaborate on a testing plan if one is to be implemented, and
requested tribal monitors present for all ground-disturbing activities.

A consultation meeting with the Wilton Rancheria was held on July 21, 2021, where the SHRA and Wilton Rancheria agreed to the activities outlined in **Mitigation Measures CUL-1** and **CUL-2**, described below. When notified of the mitigatory actions that will be undertaken for the Project, the UAIC opted to defer consultation to the Wilton Rancheria. However, per the UAIC’s request, the UAIC will be given the opportunity to review and comment on the reports/plans identified in the mitigation measures, below.

In short, through the consultation process, the SHRA, Wilton Rancheria, and the UAIC agreed upon a series of actions to be undertaken by the Project developer, which are summarized in the mitigation measures provided below.

**Mitigation Measure CUL-1**

Prior to Project-related ground-disturbing construction activities, the Project developer shall conduct a canine forensics search of the Project Site in order to identify any previously undocumented Native American burials. Following completion of the canine forensics search of the Project Site, the Wilton Rancheria may request development of a controlled testing plan. If requested, the Project developer shall develop and implement such a testing plan, to the satisfaction of Wilton Rancheria. Prior to finalization of the canine forensics report and any subsequent testing plan, the UAIC shall be given the opportunity to review and comment on the canine forensics report and testing plans.

**Mitigation Measure CUL-2**

The Project developer shall be required to retain and compensate for the services of a tribal monitor/consultant, who is approved by the Wilton Rancheria, to monitor ground-disturbing activities associated with Project construction. Upon discovery of any tribal cultural or archaeological resources, construction activities shall cease in the immediate vicinity of the find until the find can be assessed. All tribal cultural and archaeological resources unearthed by Project-related construction activities shall be evaluated by a qualified archaeologist and/or tribal monitor/consultant approved by the Wilton Rancheria. Ground-disturbing activities include, but are not limited to, pot-holing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching within the Project area. The on-site monitoring shall end when the Project Site grading and excavation activities are completed or when the tribal representatives and monitor/consultant have indicated that the site has a low potential for impacting tribal cultural resources. If a find is determined by the qualified archaeologist and/or tribal monitor/consultant approved by the Wilton Rancheria to be eligible for listing on the National Register of Historic Places, then a treatment plan shall be developed and implemented to protect or preserve the resource.

Any human remains encountered during Project ground-disturbing
activities shall be treated in accordance with California Health and Safety Code Section 7050.5. There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the County coroner has determined the manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation or to his or her authorized representative. Project personnel/construction workers shall not collect or move any human remains and associated materials. If the human remains are of Native American origin, the coroner must notify the Native American Heritage Commission (NAHC) within 24 hours of this identification. The NAHC will immediately identify a Native American most likely descendant to inspect the site and provide recommendations within 48 hours for the proper treatment of the remains and associated grave goods.

**SHPO Consultation**

The SHRA sent a letter (dated July 12, 2021) to the California OHP, SHPO that summarized the findings presented above and stated that consultation meetings with tribal governments that expressed interest in consulting were either scheduled or pending. Further, the letter stated that the SHRA would continue consultation with the Wilton Rancheria and UAIC and will develop a testing, treatment, and monitoring plan in collaboration with the tribes, pursuant to 36 CFR 800.6 (Resolution of adverse effects) and 36 CFR 800.13 (Post-review discoveries). The letter concluded that based on the findings of the cultural resources study, the SHRA has determined that a finding of “No Historic Properties Affected with implemented measures” is appropriate for the undertaking. The SHPO responded in a letter dated July 20, 2021, stating that the California OHP does not object to SHRA’s Finding of no adverse effects for this undertaking, “with the condition that consultation with the tribes will continue and the requested tribal monitors will be present as they deem appropriate.” These conditions are addressed by the mitigation measures presented above.

**Summary**

Based on the NCIC records search, literature review, archival research, Native American consultation, and SHPO consultation, the Proposed Project (the undertaking) would not result in an adverse effect on historic resources with implementation of the mitigation measures presented above. Therefore, the Project is in compliance with NHPA Section 106. There are no formal compliance steps required and no further mitigation is necessary.

**References:**


Polanco, Julianne, State Historic Preservation Officer, Letter to Stephanie Green, SHRA, July 20, 2021.
The analysis in the following paragraphs is a summary of the Noise Technical Memorandum prepared for the Proposed Project (June 17, 2021).

To demonstrate consistency with HUD guidance on noise abatement and control, HUD requires that for projects involving new construction, 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 L<sub>dn</sub> [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 L<sub>dn</sub>) and identifying noise attenuation requirements that will bring the interior noise level to 45 L<sub>dn</sub> and/or exterior noise level to 65 L<sub>dn</sub>.

In addition to HUD’s noise standards, which are provided in 24 CFR Part 51, the City of Sacramento’s General Plan Noise Element and the SCC contain the City’s policies on noise. The SCC and the Noise Element establish guidelines for controlling construction and operational noise in the City. For operational noise standards, the City identifies noise-sensitive land uses and noise sources with the intent of separating these uses.

The Project Site is located within an urbanized area where the primary sources of stationary noise are generated by urban-related activities (i.e., mechanical equipment and parking areas). The noise associated with these sources may represent a single-event noise occurrence or short-term or long-term/continuous noise. As stated above, McClellan Airfield is located approximately 4.9 miles (25,870 feet) northeast of the Project Site. The nearest railroad is located approximately 4,000 feet east of the Project Site. The nearest major roadway is Northgate Boulevard, which includes four travel lanes with a central turn lane and is located 500 feet east of the Project Site. Since the Project Site is within the distance screen criteria set by HUD in that it is within 1,000 feet of a major roadway and within 15 miles of a military or FAA-regulated civil airfield, the record must, therefore, include documentation showing that the Project Site’s noise level is acceptable (at or below 65 L<sub>dn</sub>) or that a noise barrier provides sufficient protection to future project inhabitants. The following paragraphs summarize the findings in the Noise Technical Memorandum prepared for the Project.

**Existing Ambient Noise Levels**
To quantify existing ambient noise levels in the Project area, Bollard Acoustical Consultants conducted two noise measurements on May 27, 2021, displayed in Table NOI-1, below. The noise measurement sites were representative of typical existing noise exposure within and immediately adjacent to the Project Site. The ten-minute measurements were taken between 9:30 a.m. and 11:00 a.m. Short-term (L_{eq}) measurements are considered representative of the noise levels throughout the day. Noise measurements were also taken during “off-peak” traffic noise hours (9:00 a.m. through 3:00 p.m.) as this provides a more conservative baseline. During rush hour traffic, vehicle speeds and heavy truck volumes are often low. Free-flowing traffic conditions just before or after rush hour often yield higher noise levels.

<table>
<thead>
<tr>
<th>Site No.</th>
<th>Location</th>
<th>L_{eq} (dBA)</th>
<th>L_{min} (dBA)</th>
<th>L_{max} (dBA)</th>
<th>Peak (dBA)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>NW Corner of the Project Site</td>
<td>52.0</td>
<td>43.8</td>
<td>64.5</td>
<td>84.5</td>
</tr>
<tr>
<td>2</td>
<td>South of Project Site</td>
<td>53.2</td>
<td>42.8</td>
<td>70.1</td>
<td>84.5</td>
</tr>
</tbody>
</table>


As shown in Table NOI-1, measured daytime noise levels ranged from 52.0 to 53.2 dBA L_{eq} as measured on the northwest side of the Project Site, and south of the Project Site, adjacent to the existing multifamily residential building. Therefore, existing daytime noise levels on and adjacent to the Project Site, as measured in late May 2021, would comply with HUD’s noise standards found at 24 CFR 51 given that the daytime noise levels would be considered acceptable (not exceeding 65 dB).

**Traffic-Generated Noise Levels**

According to CalEEMod version 2020.4.0 (i.e., the air emissions model used for the Project) program default trip generation rates, the Project would generate approximately 490 daily trips on weekdays, 545 daily trips on Saturdays, and 421 daily trips on Sundays. These trip generation rates are calculated for a market-rate, low-rise apartment land use. While the Project would consist of a low-rise residential building, the nature of the Project being affordable housing and having only 14 parking spaces provided on-site (meaning that not all residents would have personal vehicles) means that the actual trip generation for the Project would be much lower than the programmed value.

There are several metrics used to characterize community noise exposure, which fluctuate constantly over time. One such metric, the equivalent sound level (L_{eq}), represents the average sound level over the period of sound measurement. L_{min} and L_{max} represent the lowest and highest values measured by the sound level meter over the period of sound measurement. Peak represents the highest value measured by the sound level meter, which is not weighted using the L scale, and could be the result of short, sporadic passing vehicle or a gust of wind.

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[34]
than these values. This is because affordable housing has been known to result in fewer trips than market-rate housing, according to the California Office of Planning and Research. Therefore, using the trip generation rate for market-rate housing when estimating Project-generated vehicle trips provides a conservative analysis, as actual Project-related trip generation would likely be much less.

The average daily trips (ADT) along Northview Drive were collected in 2000 and 2003, growing from 2,225 in 2000 to 2,308 in 2003, which represents an approximately 1.2 percent annual growth rate. Therefore, a 1.2 percent annual growth rate was applied to the ADT and the existing ADT along Northview Drive was calculated as approximately 2,861 trips per day. As such, the Proposed Project would increase the daily trips in the Project vicinity by up to 19.0 percent. According to the California Department of Transportation (Caltrans), a doubling of traffic (100 percent increase) on a roadway would result in a perceptible increase in traffic noise levels (3 dBA). As such, the Project-related increase in traffic volume along the surrounding roadway would not be significant compared to existing traffic, as the project would increase daily trips by 19.0 percent and would not result in a perceptible increase traffic noise level (less than 100 percent).

Given that there are no sources of substantial stationary noise near the Project Site, such as industrial land uses, the major noise source that would potentially impact the Project Site would be generated by traffic along Northview Drive. The proposed on-site residences that would be exposed to the highest potential level of traffic noise would be the units located closest to Northview Drive at the northwest corner of the Project Site, on the south side of the proposed parking area and driveway. These units would be located approximately 35 feet from the centerline of Northview Drive. A Federal Highway Administration traffic noise model (FHWA RD-77-108) was used to model traffic noise levels at the proposed on-site residences under existing plus Project conditions. The modeled results are shown in Table NOI-2, below.

### Table NOI-2

**Exterior and Interior Noise Levels on the Project Site**

<table>
<thead>
<tr>
<th>Roadway Segment</th>
<th>Existing Plus Project ADT</th>
<th>L_{dn} at 100 Feet from Centerline of Roadway (dBA)</th>
<th>Exterior L_{dn} at Proposed On-Site Residences (dBA)</th>
<th>Interior L_{dn} at Proposed On-Site Residences (dBA)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Northview Drive</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>South of West El Camino Avenue</td>
<td>3,406</td>
<td>54.9</td>
<td>64.0</td>
<td>40.0</td>
</tr>
</tbody>
</table>

ADT = average daily trips; L_{dn} = day-night sound level

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4 The closest roadway segment to the project side with available data is Northview Drive at West El Camino Avenue. The total of northbound and southbound daily trips represents the segment daily trips.
As shown in Table NOI-2, above, noise levels at the proposed on-site residences would be acceptable per HUD’s criteria for exterior noise of 65 dBA L_{dn} described above. According to the USEPA’s Protective Noise Levels, typical buildings in warm climates could provide 24 dBA exterior to interior noise reduction with windows closed. Therefore, in addition to noise levels being acceptable, the interior noise levels at the proposed on-site residences would be 40 dBA L_{dn}, which would meet HUD’s criteria of 45 dBA L_{dn} for attenuated indoor noise.

Therefore, while the Project Site is located within 1,000 feet of a major roadway and within 15 miles of a military or FAA-regulated airfield, the Project Site is located within an acceptable noise zone. As such, there are no formal compliance steps or mitigation required and no further analysis is necessary.

References:
Governor’s Office of Planning and Research, Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018.
amended, particularly section 1424(e); 40 CFR Part 149

aquifer given the distance between this aquifer and the Project Site, as well as a level of groundwater demand associated with the Project (further discussed in the Community Facilities and Services section, below).

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 Executive Order 11990 (“draining, dredging, channelizing, filling, diking, impounding, and related activities and any structures or facilities begun or authorized after the effective date of this Order [May 1977]).”

As determined using the US Fish and Wildlife Service’s National Wetlands Inventory, there are no known wetlands within or adjacent to the Project Site. The National Wetlands Inventory identifies the channel on the south side of Garden Highway, 1,220 feet south of the Project Site, as the closest riverine feature. This riverine feature is surrounded on the north and south sides by a freshwater forested/shrub wetland feature. Given the distance between the Project Site and these features, construction activities associated with the Proposed Project would not result in sedimentation or other impacts that would negatively impact wetland habitats.

As described above, the Project Site is a flat, 1.23-acre rectangular parcel that is characterized by non-native ruderal grasses. There are no drainages or hydrologic features on the Project Site, nor are there depressions or topographical features indicative of potential wetland areas.

Further, grading and construction activities associated with the Proposed Project would be required to comply with state stormwater runoff and sedimentation prevention requirements (such as the State Water Resources Control Board’s Construction General Permit), and new construction requirements enforced by the City of Sacramento (such as completion of a required Water Quality Management Plan and Stormwater Pollution Prevention Plan, per SCC 13.16). These requirements are discussed further in the Land Development section, below. Because grading- and construction-related sediment would be regulated by state and local water quality protections, and because the nearest surface water feature is approximately over 1,200 feet away from the Project Site, no wetlands would be impacted in terms of Executive Order 11990’s definition of new construction.

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><strong>Wild and Scenic</strong> Rivers Act of 1968, particularly section 7(b) and (c)</td>
<td>☑️</td>
<td>☐</td>
</tr>
</tbody>
</table>

The Project Site is located approximately one-half mile north of the American River, which is identified as part of the National Wild and Scenic Rivers System, operated by the US Fish and Wildlife Service. Specifically, the US Fish and Wildlife Service states that the lower American River is the most heavily used recreation river in California, providing an urban greenway for trail and boating activities. The river is also known for its runs of steelhead trout and salmon.

While the Project Site is located approximately one-half mile north of the lower American River, the Project would not adversely affect the wild and scenic nature of the river. The Project would develop affordable housing on a currently vacant site and is not a water resources project that could affect the free-flowing condition of the American River (such as dams, water diversion projects, bridges, roadways, etc.). Further, because direct impacts associated with the Project would be limited to the Project Site, the Project would not have a direct and adverse effect within wild and scenic river boundaries, invade the area or unreasonably diminish the river outside wild and scenic river boundaries, or have an adverse effect on the natural, cultural, and/or recreational values of the American River.

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

**References:**


<table>
<thead>
<tr>
<th>ENVIRONMENTAL JUSTICE</th>
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</tr>
</thead>
<tbody>
<tr>
<td><strong>Environmental Justice</strong></td>
<td>☑️</td>
<td>☐</td>
</tr>
<tr>
<td>Executive Order 12898</td>
<td></td>
<td></td>
</tr>
</tbody>
</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 Executive Order 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>LAND DEVELOPMENT</td>
<td>(2) No impact anticipated</td>
<td>Conformance with Plans</td>
</tr>
</tbody>
</table>

The Sacramento Area Council of Government’s (SACOG) 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (2020 MTP/SCS) represents a 20-year plan for growth and transportation investment in the SACOG region that “facilitates vibrant, healthy communities where residents have access to affordable homes, good jobs, clean air, and ready access to the places and destinations that are part of everyday life.” According to the 2020 MTP/SCS, the regional population growth is projected to increase from 2,376,311 persons in 2016 to 2,996,832 persons in 2040. Further, the number of housing units within the SACOG region is projected to grow from 921,123 in 2016 to 1,181,251 in 2040. In the City of Sacramento, the total number of housing units is anticipated to grow from 194,470 in 2016 to 267,970 in 2040 (an increase of 73,500 housing units).

One of the actions listed under the 2020 MTP/SCS’s stated goal to “build vibrant places for today’s and tomorrow’s residents” is to develop a regional housing needs plan with action steps and incentives that put member agencies in a better position to accelerate infill and affordable housing production. This regional housing needs plan (referred to as the regional housing needs allocation or RHNA) was adopted by the SACOG board of directors on March 19, 2020, and includes a total number of housing units that each jurisdiction should accommodate in order to ensure cities and counties are planning for enough housing for future
needs. The California Department of Housing and Community Development (HCD) provided SACOG a regional target of 153,512 housing units. SACOG’s RHNA plan includes a breakdown of how many housing units each jurisdiction within SACOG’s region should plan to accommodate. Of the 153,512 regional housing units, the RHNA identifies 45,580 total units for the City of Sacramento between 2021 and 2029 (16,769 of which would be for very low- and low-income households).

According to the California Department of Finance, the City of Sacramento has an estimated total population of 515,673 (as of January 2021) with an average of 2.7 persons per household.

The City of Sacramento’s 2035 General Plan Land Use Element states that the City shall regulate building density set out in the General Plan and SCC in order to ensure cumulative development would not exceed a population of 640,400 persons. Specifically, the 2035 General Plan estimates that the population in the City of Sacramento would grow to 560,278 in 2025 and to 640,381 in 2035.

The Project would result in an increase of 67 residential units, 66 of which would be studio units for low-income households experiencing homelessness. While the average household size in Sacramento is 2.7 persons per household, studio units could have a maximum of two persons per unit. Therefore, the Project could result in an increase of up to 135 persons to the population of Sacramento; however, the actual increase in population would likely be lower as it is unlikely that every studio apartment would house two persons. Regardless, an increase of 135 persons to the City of Sacramento would represent approximately 0.16 percent of the 2035 General Plan’s planned population growth between 2025 and 2035. Further, 67 units of new residential housing would add 67 housing units to the SACOG region, or approximately 0.09 percent of the number of housing units anticipated to be developed in the SACOG region between 2016 and 2040. Additionally, the proposed 66 affordable housing units would account for approximately 0.39 percent of the City of Sacramento’s low-income housing unit RHNA allocation.

Therefore, because the Project would represent a minute percentage of the projected/anticipated growth in the City of Sacramento’s General Plan, and a minute percentage of the total regional growth projected by the MTP/SCS, the Project would not conflict with the population growth projections identified in these plans. Further, by providing affordable housing, the Project would contribute to the affordable housing construction goals outlined in the SACOG RHNA.

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

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5 66 studio units * 2 persons per unit = 132. 2.7 persons per household * one-market rate manager’s unit = 2.7. The total would be 134.7 or 135 persons.
Land Use and Urban Design Element

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

Housing Element

- Goal H-3.1: Provide a variety of housing options for extremely low-income households.

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

Project design features, such as common outdoor spaces located on the interior of the proposed structure, landscaping, and amenities such as community and meeting rooms, a kitchen, and lounge comply with many of the recommendations in the Design Guidelines, including, but not limited to:

- 1-1: Residential buildings should be arranged to provide functional public and private outdoor spaces.
- 1-4: Encourage appropriate amenities to serve anticipated residents.
- 1-5: Active common spaces should encourage gatherings and avoid noise, light, and other potential conflicts with adjacent neighbors.
- 1-6: Infill development within existing neighborhoods should be sensitively designed to respect existing residential patterns and development, and reinforce the character and functional relationships of existing neighborhoods.
- 2-1: Multi-unit buildings are encouraged to be oriented to the adjacent public street by providing large windows, porches, balconies and entryways or other entry features along the street. Multi-unit structures that present a blank wall are not allowed. Active spaces provide visual access to street side activities. Balconies are allowed internally.
- 2-4: Building ends should contain windows and active spaces to provide for additional security, and visual interest.
- 2-6: Pedestrians should have clear, unobstructed access to the
street and nearby transit stops.

- 4-1: Surface parking lots should be located away from the adjacent public roadways, to the rear of (or beneath) buildings where possible. Parking areas should not be located adjacent to public roadways.
- 6-4: Common facilities such as recreation rooms, laundry and mail areas should be located adjacent to common open space to increase activity in these areas.
- 6-5: Common open spaces should be designated as a visible, accessible transition between the street and individual units.
- 7-1: Exterior site design and landscaping should provide functional recreational spaces and/or community site amenities.
- 7-2: Exterior spaces should be designed to enhance the overall appearance and compatibility of such development by providing privacy, buffering daylight, and to provide a pleasant transition to the street.
- 7-5: Incorporate appropriate landscaping that includes a variety of trees, shrubs, and other plantings. Unpaved areas should be planted with irrigated plant materials. Unpaved areas where landscaping would be challenging should be mulched to minimize weed growth and improve appearance.
- 7-8: Landscaping should be in scale and compatible with the project and adjacent land uses.
- 16-1: Variety in the architecture, which adds interest and character, is encouraged.
- 16-4: Use high quality (permanent and long lasting) building materials to contribute to sustained quality and sense of permanence.

Compatible with Land Use and Zoning

According to the City of Sacramento Planning and Development Code, the Project Site is classified as R-3-R, which is not represented in the City’s Zoning Code. According to the City of Sacramento Planning Department, there is no difference between zone R-3-R and zone R-3. The second ‘R’ in the R-3-R designation refers to a section that has been removed from the SCC. In short, development on the entire Project Site is governed by R-3 design and construction standards.

The purpose of the R-3 zone is to accommodate traditional types of apartments. This zone is located outside the central city, serving as a buffer along major streets and near shopping centers. The maximum building height is 35 feet, the maximum density is 30 dwelling units per net acre, the maximum lot coverage is 50 percent, and the minimum lot size is 2,000 square feet. The front yard minimum setback is 10 feet and the rear yard setback is 15 feet. The Project would meet these design standards by constructing a structure that would have a maximum building height of 23.5 feet, a 10-foot front setback, and a 22-foot rear setback. Further, the Project would have a lot coverage of approximately
44 percent with a lot size of 52,559.5 square feet. The City of Sacramento General Plan designates the Project Site as Suburban Neighborhood High Density (15-30 dwelling units per acre) with a floor area ratio (FAR) between 0.35 and 1.55. Per SCC Sections 17.208.310 and 17.228.117, multi-unit dwellings in R-3 zones must have a manager residing on-site. Section 17.608.030B of the SCC requires 1.5 parking spaces per unit since the Project is located in what the City classifies as a Suburban District. Therefore, the total parking requirement for the Project (with 67 residential units) would be 100.5 parking spaces; however, a 50 percent reduction in parking is allowed for affordable housing. Further, Assembly Bill (AB) 1763 provides incentives for affordable housing development, including a waiver of parking requirements for special needs housing, such as the Proposed Project.

Chapter 17.704 of the SCC provides density bonuses, waivers, and incentives for affordable housing projects and establishes procedures to implement the State Density Bonus Law in Government Code Section 65915. Incentives provided for affordable housing construction pursuant to AB 1763 include an 80 percent increase in density, which would increase the maximum number of dwelling units permitted on the Project from 36.9 (30 dwelling units per acre on a 1.23-acre site) to 67 units. Therefore, because multiunit residential is an allowable use within the R-3 zone, and with a density bonus pursuant to AB 1763, the Project's density would be consistent with the Project Site’s zoning and General Plan designation.

Further, the Project would be required to comply with wall and fence regulations, as outlined in Section 17.620.100 of the SCC, as well as building height and setback regulations, as outlined in Chapter 17.208, Article III of the SCC and described above.

In short, with the development incentives provided to the Project pursuant to AB 1763 and Chapter 17.704 of the SCC, and with final approval of designs by City of Sacramento Planning staff, the Project would be consistent with current SCC zoning regulations.

**Scale and Urban Design**

As stated in the Project Description of this Environmental Assessment, the Project would consist of a series of structures connected by covered walkways, trellises, and rooflines, giving the impression of a single two-story structure. The result is a two-story, garden-style apartment building designed around central courtyards and open spaces that allow airflow through the courtyards and breezeways. This is illustrated by the Project’s proposed elevations (provided in Figure 4 and Figure 5), as well as in conceptual Project renderings (provided in Figure 6a and Figure 6b). The structure would be clad in neutral-colored stucco on the north, east, and southern elevations and would include casement windows. The western building elevation, facing Northview Drive, would include multiple materials and textures to provide visual interest, such as a two-story corrugated, perforated metal screen (with stucco behind the screen)
on the northwest building elevation, cement board siding, corrugated metal siding, and casement windows.

In total, the Project would be 31,026 square feet in size (including areas within interior walls and excluding exterior, covered, non-enclosed areas), and would rise to a maximum height of 23 feet and 6 inches. The Project would be similar in height, scale, and use to surrounding multifamily development to the south and west. For example, the Project would be similar in height to the two-story multifamily residential structure south of the Project Site (which has a building height of approximately 26 feet), but taller than the two-story multifamily residential structure to the west, across Northview Drive (which has a building height of approximately 21 feet). The Project would be similar in height to the church to the west of the Project Site (approximately 24 feet high) and the senior housing north of the Project Site (approximately 28 feet high). Finally, the Project would be similar in height, but much smaller in scale when compared to the large, region-serving commercial center to the east. Therefore, the Project would be similar in scale, mass, and height to other residential and institutional land uses surrounding the Project Site and would be less intense than the commercial development to the east. The Project would not represent a significant change in the size, scale, placement, or height of the site in relation to surrounding structures. Further, the Project would enhance street-level activity along Northview Drive given the Project’s storefront design and short setback from the western Project Site boundary.

Additionally, the Project would be consistent with the City of Sacramento’s Multi-Unit Dwelling Design Guidelines, which provides guidance as to appropriate designs for multifamily residential structures in the City. This document describes a number of design approaches/guidelines relating to site design, parking/circulation, landscaping, lighting, drainage, architecture, and fencing/walls. The Project would be consistent with numerous guidelines in this document, including providing appropriate amenities to serve anticipated residents (guideline 1-4); orienting multiunit buildings such that the street-facing façade provides clear entryways, porches, or other entry features along the street (guideline 2-1); providing interior common spaces and facilities (guideline 6-4); design exterior landscaping to enhance the overall appearance of the structure (guideline 7-2); including a variety of trees, shrubs, and other plantings in the landscaping plan (7-5); including a variety in the architecture to add interest and character (guideline 16-1); and using high quality building materials (guideline 16-4).

Therefore, no Project-related impacts related to compatibility with plans, zoning, scale, and urban design are anticipated.

References

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

City of Sacramento, 2035 General Plan Land Use and Urban Form
<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**

The following paragraphs summarize the Preliminary Soil Investigation conducted for the Project by Raney Geotechnical, Inc. on May 29, 2020. A soil investigation was performed on the Project Site in 2006 as part of a previous project. This 2006 investigation included three test borings to a depth of 15 feet. To supplement this past investigation, Raney Geotechnical, Inc. conducted an additional test boring to a maximum depth of 58.5 feet.

**Existing Conditions**

The Project Site is located in the Great Valley geomorphic province of California. The Great Valley is a flat, alluvial plain approximately 50 miles wide and 400 miles long in the central portion of California. It is composed of the Sacramento Valley drained by the Sacramento River in the north and the San Joaquin Valley drained by the San Joaquin River in the south. It is surrounded by the Sierra Nevada to the east, the Tehachapi Mountains to the south, the Coastal Range to the west, and the Cascade Range to the north. The geology of the Great Valley is typified by thick sequences of alluvial sediments derived primarily from erosion of the Sierra Nevada Range and, to a lesser extent, erosion of the Klamath Mountains and Cascade Range to the north. These sediments were transported downstream and subsequently laid down as a river channel, floodplain deposits, and alluvial fans.

As stated above, the Project Site is undeveloped, relatively flat, and is characterized by non-native grasses and ruderal plant species. Given the flat nature of the Project Site, there would not be any substantial slopes that would result in landslide, erosion hazards, or other slope stability problems for future residents of the Project. The soil borings conducted as part of the soil investigation encountered surface soils consisting of loose, light brown, very fine sandy silts and very silty fine sands. The
silty/sandy surface soils were observed to extend to depths varying from about 4 to 7 feet. Beneath the surface soils, and extending to depths varying from about 12 to 14 feet, stiff to very stiff, gray-brown to brown clayey fine sandy silts and silty clays were observed. Beneath the clayey soils and extending to a depth on the order of 28 feet, medium dense, light brown silty fine sands and very stiff, fine sandy clayey silts were encountered. Between depths of about 28 feet and 32 feet, loose, light brown, fine sandy silts and silty fine sands were observed. Beneath the loose sandy layers and extending to the 58.5-foot maximum depth drilled, dense to very dense light brown to gray fine to coarse sands and dense/hard partially cemented fine sandy to clayey silts were found.

**Groundwater**

Groundwater was encountered in 2006 at depths varying from 13 to 14.5 feet below existing site grades. Groundwater was encountered in the updated test boring at a depth of 15 feet below the ground surface. Groundwater levels in the area fluctuate with rainfall and flow levels in the nearby Sacramento and American Rivers. During the rainy season and prolonged high river stages, groundwater levels could be expected to rise to levels higher than those measured. Soil color mottling observed in the test borings would indicate groundwater levels at least as high as 5 feet below the existing ground surface have periodically occurred. Based on this information, Raney Geotechnical, Inc concluded that the groundwater table can rise to within a few feet of the ground surface. The groundwater is not expected to have a significant effect on the performance of the completed construction. Utility or other construction excavations may experience groundwater inflow, depending on depth, weather, and the construction season. The near-surface soils have poor drainage characteristics and can retain high moisture contents during and for some time following the rainy season. High moisture content soils can be unstable under construction equipment and considerable aeration may be required to achieve a moisture content which will allow compaction.

**Expansive Soils**

The borings encountered surface soils consisting of nonplastic to low plasticity silts and silty sands within the upper 2 feet across the Project Site. These soils are considered to be of low expansion potential and are not expected to develop significant swelling potential with variations in moisture content. The clays below 2 feet are moderately plastic and are capable of developing significant expansion pressures; however, at the depth encountered, overburden pressures and reduced moisture variations are expected to reduce expansive soil effects.

Further, the analysis states that the Project should follow a series of construction recommendations, as well as all applicable state (i.e., California Building Code) and local building standards to ensure soil suitability and building safety. The construction recommendations relate to Project Site preparation (e.g., clearing existing vegetation/root systems and removal and recompaction of the upper 810 inches of previously disturbed soils); foundation depths and reinforcement of
foundation trenches; pavement recommendations (e.g., preparation of subgrade soils for new pavements); and corrosivity (e.g., consulting a qualified corrosion engineer as soils are characterized as being highly corrosive to cast iron and ductile iron piping). The full list of recommendations is provided in the Preliminary Soil Investigation prepared for the Project.

**Erosion, Drainage, and Stormwater Runoff**

There are no watercourses or drainage features on or adjacent to the Project Site that would be impacted by the Proposed Project. While Project-related construction would result in ground disturbance, the Project would be required to include appropriate sediment and pollution control measures. Specifically, stormwater-related erosion of uncovered soils during construction activities would be prevented by complying with local sediment and pollution control measures, in accordance with the area-wide National Pollution Discharge Elimination System (NPDES) stormwater permit, regulating discharge of urban runoff from the Municipal Separate Storm Sewer System, issued by the Central Valley Regional Water Quality Control Board. This NPDES permit requires the City of Sacramento to develop pollutant control programs for urban stormwater runoff discharges. Further, because the Project Site is greater than 1 acre in size, the Project would be required to comply with the State Water Resources Control Board Construction General Permit, which requires construction activities to incorporate BMPs, which could include the use of berms or drainage ditches to divert water around the site and preventing sediment from migrating off-site by using temporary swales, filters, or silt fencing.

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

Once occupied, the Project Site, which is currently undeveloped, would be covered by impervious surfaces and managed landscaping and, thus would not be susceptible to substantial erosion or siltation. The Proposed Project would tie into the existing stormwater drainage system within Northview Drive. Further, the Project would be required to comply with SCC 13.08.145, which states that when a property
contributing to a storm drain system or combined sewer system is developed, all project-related stormwater and surface runoff drainage impacts shall be fully mitigated to ensure that the project does not affect function of the storm drain or sewer system. Additionally, the Project would be required to comply with stormwater discharge requirements enforced by the City of Sacramento, such as completion of a Stormwater Pollution Prevention Plan (SWPPP), per Chapter 13.16 of the SCC. Examples of typical best practices in SWPPPs include storing materials and equipment to ensure that spills or leaks do not enter a storm drain or a surface water feature and installing filters or sediment traps preventing contaminants from entering storm drains. Therefore, because the Project would be required to comply with existing local and regional water requirements, the Project would not result in impacts related to water quality.

References:

<table>
<thead>
<tr>
<th>Hazards and Nuisances including Site Safety and Noise</th>
<th>(2) No impact anticipated</th>
</tr>
</thead>
</table>

Hazards and Site Safety
The Project Site is located in an urbanized area and is not in the vicinity of most natural hazards, including hazardous terrain, volcanoes, steep slopes/landslide areas, and fire-prone areas. The Project Site does not include any known poisonous plants, animals, or insects, nor is it located in an area susceptible to wind or sandstorms.

Pursuant to Policy PHS 3.1.1, in the Sacramento 2035 General Plan, which states that the “City shall ensure building and sites are investigated for the presence of hazardous materials and/or waste contamination before development for which City discretionary approval is required,” a Phase I ESA was completed for this Project by Partner Engineering and Science, Inc., in May 2020. This study is discussed in the Contamination and Toxic Substances section, above. In short, the Phase I ESA did not find any recognized environmental conditions on the Project Site.

Seismic Hazards
According to the City of Sacramento’s 2035 General Plan Background Report, there are no known earthquake faults within the greater Sacramento region. However, significant earthquakes have occurred on previously undetected faults. Known faults located nearest to the region are the Foothills fault system to the east, the Midland Fault to the west, and the Dunnigan Hills Fault to the northwest. The Foothills fault
system is located on the western edge of the Sierra Nevada Range over 20 miles from the Sacramento area and consists of a complex of north-south trending faults. The Midland fault zone is considered to be a deep pre-Pleistocene subsurface feature extending nearly 50 miles along the west side of the Sacramento Valley, from the Delta to Lake Berryessa. The Dunnigan Hills Fault is approximately 20 miles northwest of the City of Sacramento. Therefore, the Project Site is not situated within a mapped earthquake fault zone, nor do any mapped faults cross the site.

Soil liquefaction is the loss of strength of low- to no-cohesion soils (usually sands) that occurs when pore water pressure exceeds the confining stress (weight) of the soils. Liquefaction normally occurs only under saturated conditions and in soils with a low relative density. Liquefaction can occur during earthquakes as vibrations induce soils to readjust to a more compact state. Experience has shown that earthquake-induced liquefaction normally occurs only within the upper 50 to 60 feet of the soil profile. The test borings on this and nearby sites show soils within about 14 feet of the ground surface predominantly consist of clays and clayey silts. Such cohesive soils are not considered susceptible to liquefaction. Medium dense and loose sands and sandy to clayey silts were found in saturated or potentially saturated zones between depths of 14 and about 32 feet. Such soils can be susceptible to liquefaction depending on the level of seismic shaking. Below about 32 feet only dense and hard/cemented soils that are not susceptible to liquefaction were found. Analysis performed by Raney Geotechnical, Inc. determined that loose sands at a depth of about 30 feet below ground surface on the Project Site may approach a state of liquefaction during a maximum shaking event. Under such conditions and at the maximum potential shaking levels, some densification of the sandy soils may occur with resulting surface settlements. The maximum potential settlement is estimated to be on the order of three-quarters inch. The Project can reduce the effects of such settlement by using increased foundation depths and reinforcement.

While the Project may be exposed to seismic ground shaking hazards, the Project would be subject to the California Building Code, which requires the design of structures to consider dynamic forces resulting from seismic events.

Nuisances

A field inspection of the Project Site identified no evidence that the Project Site would be affected by gas, smoke, or fumes; odors; vibration; glare from adjacent residential, institutional, or commercial uses; vacant buildings; unsightly land uses; front lawn parking; abandoned vehicles; or vermin infestation from the uses surrounding the Project Site.

Noise

The Project itself would not be a noise-generating facility, such as an industrial land use. Noise generated by operation of the Project would be typical of other residential land uses in the Project vicinity. There are
no design characteristics of the Project that would generate substantial noise levels that would be out of character for the area, such as amplified noise, trucks, or outdoor play fields. Project construction would generate noise during construction; however, this noise would be temporary in nature and would fluctuate depending on the day of construction and the location of the equipment on the Project Site. The following paragraphs outline the noise impacts of the Project on nearby noise-sensitive uses during Project construction and operation.

Construction

The Project involves construction activities associated with grading, paving, building construction, and architectural coating applications. The Project would be constructed over approximately 16 months. Ground-borne noise and other types of construction-related noise impacts would typically occur during the initial earthwork phases. This phase of construction has the potential to create the highest levels of noise. Typical noise levels generated by construction equipment are shown in Table NOI-3, below. Operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be due to random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts).

### Table NOI-3

<table>
<thead>
<tr>
<th>Type of Equipment</th>
<th>Acoustical Use Factor$^1$</th>
<th>$L_{max}$ at 50 Feet (dBA)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Concrete Saw</td>
<td>20</td>
<td>90</td>
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<tr>
<td>Crane</td>
<td>16</td>
<td>81</td>
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<tr>
<td>Concrete Mixer Truck</td>
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<td>79</td>
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<tr>
<td>Backhoe</td>
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<td>78</td>
</tr>
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<td>Dozer</td>
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</tr>
<tr>
<td>Excavator</td>
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</tr>
<tr>
<td>Forklift</td>
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</tr>
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<td>Paver</td>
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<td>77</td>
</tr>
<tr>
<td>Roller</td>
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<td>Tractor</td>
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<tr>
<td>Water Truck</td>
<td>40</td>
<td>80</td>
</tr>
<tr>
<td>Grader</td>
<td>40</td>
<td>85</td>
</tr>
<tr>
<td>General Industrial Equipment</td>
<td>50</td>
<td>85</td>
</tr>
</tbody>
</table>

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

Source: Federal Highway Administration, Roadway Construction Noise Model
Noise levels depicted in Table NOI-3 represent maximum sound levels ($L_{max}$), which are the highest individual sound occurring during an individual time period. Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Additional land uses such as parks, historic sites, cemeteries, and recreation areas are considered sensitive to increases in exterior noise levels. Schools, churches, hotels, libraries, and other places where low interior noise levels are essential are also considered noise-sensitive land uses. The nearest sensitive receptor is a church located approximately 75 feet to the west of the Project Site across Northview Drive. The nearest residential uses are multifamily residences located approximately 105 feet south of the Project Site.

These sensitive receptors may be exposed to elevated noise levels during Project construction. The SCC does not establish quantitative construction noise standards. Instead, the SCC has established allowable hours of construction (7:00 a.m. to 6:00 p.m. Monday through Saturday, and 9:00 a.m. to 6:00 p.m. on Sunday), provided in Section 8.68.080 of the SCC. These permitted hours of construction are required in recognition that construction activities undertaken during daytime hours are a typical part of living in an urban environment and do not cause a significant disruption.

Operation

Future development generated by the Proposed Project would result in some additional traffic on adjacent roadways, thereby potentially increasing vehicular noise in the vicinity of existing and proposed land uses. The most prominent source of mobile traffic noise in the project vicinity is along Northview Drive. Based on the City’s General Plan Noise Chapter, Northview Drive is not considered a major roadway and no noise contours are available.

According to the CalEEMod 2020.4.0 (i.e., the air emissions model used for the Project) default trip generation rates, the Project would generate approximately 490 daily trips on weekdays, 545 daily trips on Saturdays, and 421 daily trips on Sundays. As stated in the Air Quality section above, this calculation is an overestimate given the affordable nature of the proposed residential units, proximity of the Project Site to transit, and relatively few parking spaces available on the Project Site. While Project-generated trips would likely be less than this estimate, an overestimate would result in a greater noise impact and is therefore analyzed below to provide a conservative analysis.

The average daily trips (ADT) along Northview Drive were collected in
2000 and 2003, growing from 2,225 in 2000 to 2,308 in 2003, which represents approximately 1.2 percent annual growth rate. Therefore, a 1.2 percent annual growth rate was applied to the ADT and the existing ADT along Northview Drive was calculated as approximately 2,861 trips per day. As such, the Proposed Project would increase the daily trips in the project vicinity by up to 19.0 percent. According to Caltrans, a doubling of traffic (100 percent increase) on a roadway would result in a perceptible increase in traffic noise levels (3 dBA). As such, the Project-related increase in traffic volume along the surrounding roadway would not be significant compared to existing traffic, as the Project would increase daily trips by 19.0 percent and would not result in a perceptible increase in traffic noise level (less than 100 percent). Thus, no Project impact is anticipated.

**References:**

California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013

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


Google Earth, map data 2021.


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

### Energy Usage

An increase in energy consumption would result from the development of the Project; however, the Project would be required to comply with the 2020 California Green Building Standards Code (CALGreen, Title 24, Part 11), 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-efficient technologies and methods. The 2019 update to the Title 24 standards includes energy-efficient improvements to residential development, including photovoltaic panel standards, which would be included on the rooftop of the Proposed Project, as well as improved wall, attic, water heating, and lighting efficiency standards.

The Project Site is located in an urban environment, and is within walking distance (one-half mile) of a general store; churches; a hardware store; restaurants; retail uses; and recreation assets, such as Ninos Park, located northwest of the Project Site, and open space and trails along the American River south of the Project Site.

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6 The closest roadway segment to the Project Site with available data is Northview Drive at West El Camino Avenue. The total of northbound and southbound daily trips represents the segment daily trips.
Further, the Project is within one-quarter mile of West El Camino Avenue, which is served by the Sacramento Regional Transit District’s Route 88 bus route, which connects the Project area to downtown Sacramento, the State Capitol, and light rail service to other regional attractions, such as commercial centers, the Sacramento Zoo, and Sacramento City College. As a result, the Project would encourage walking and transit usage, resulting in less energy consumption than a similar development in an auto-dependent, rural area.

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

**Energy Utilities and GHG Emissions**

The Sacramento Municipal Utility District (SMUD) is responsible for the generation, transmission, and distribution of electrical power to its 900-square-mile service area, which includes the Project Site. SMUD is a publicly owned utility that has arrangements with other area electricity providers to purchase and sell short-term power to meet load requirements and reduce costs. SMUD’s power sources include 28 percent renewable (biomass, geothermal, hydroelectric, solar, and wind), 44 percent large hydroelectric, and 27 percent natural gas. Further, SMUD is required to comply with the state’s Renewables Portfolio Standard, which requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 60 percent by 2030 and requires all the state’s electricity to come from carbon-free resources by 2045. Natural gas is supplied to the Sacramento area by Pacific Gas and Electric (PG&E). The Master Environmental Impact Report prepared to support the Sacramento 2035 General Plan Update outlines a series of service upgrades that PG&E plans to implement in the Sacramento area, which are designed to reduce the overall cost of meeting future customer load growth, avoiding stranded assets, and ensuring reliable service to customers in Sacramento. No major upgrades to the electrical or natural gas delivery system are anticipated as a result of this Project. This is because overall projections put forth by the California Energy Commission’s 2014-2024 California Energy Demand Forecast suggest that natural gas demand is likely to decrease due to local and regional efficiency initiatives, higher projected natural gas rates, and climate change, resulting in projected decreases in heating degree days. The annual growth rate for electricity demand is projected to be between 0.76 and 1.54 percent for low energy demand and high energy demand scenarios, respectively. As such, overall electricity demand is not anticipated to increase significantly. The long-term impact from the increased energy use by the Proposed Project is not significant in relationship to the total number of consumers served by SMUD and PG&E; therefore, the Project would not require expansion of energy or natural gas facilities.

The majority of GHG emissions associated with construction of the
The Proposed Project would involve construction of 66 affordable housing units (studio units) and one market rate manager’s unit. A minor increase in construction-related employment opportunities would occur as a result of construction phases of the Project. Further, the Project would provide conference and meeting spaces for case

<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></td>
<td></td>
</tr>
<tr>
<td>Employment and Income Patterns</td>
<td>(1) Minor beneficial impact</td>
<td>The Proposed Project would involve construction of 66 affordable housing units (studio units) and one market rate manager’s unit. A minor increase in construction-related employment opportunities would occur as a result of construction phases of the Project. Further, the Project would provide conference and meeting spaces for case</td>
</tr>
</tbody>
</table>
workers and social workers to meet with Project inhabitants, which may increase employment opportunities for such social workers. However, Project’s influence on employment and income patterns is anticipated to be temporary and/or minor. According to analysis performed by SHRA using a calculation tool developed by the Center for Strategic Economic Research (CSER), the Project is projected to create approximately 388 total jobs (219 direct jobs and 168 jobs through indirect and induced activities) and create $33,136,428 in total economic output ($20,198,717 of direct output and another $12,937,710 of output through indirect and induced activities). CSER utilized the IMPLAN input-output model (2009 coefficients) to quantify the economic impacts of a hypothetical $1 million of spending in various construction categories within the City of Sacramento in an average one-year period. Actual impacts could differ significantly from the estimates. Regardless, the Project would not result in a substantial adverse effect on employment and income patterns and would, rather, result in a minor beneficial impact on employment and income patterns.

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<tr>
<th>Demographic Character Changes, Displacement</th>
<th>(2) No impact anticipated</th>
</tr>
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</table>

**Demographic Character Changes**

The Project would consist of construction of 66 affordable housing units (studio units) and one market rate manager’s unit on a currently vacant site. No existing residential units would be removed as part of the Proposed Project. Therefore, the Project would provide more housing opportunities for low-income households.

There are no design features as part of the Proposed Project that would isolate a particular neighborhood or population, making access to local services, facilities, and institutions or other parts of the City more difficult. Rather, the Project would be located near community resources, such as churches, recreation assets, commercial uses, and transit opportunities, such as the Sacramento Regional Transit District’s Route 88 bus route located on West El Camino Avenue, which reduces physical barriers and population isolation.

Further, the Project Site is surrounded by residential land uses to the south, west, and north (beyond the senior care facility to the north), a church to the west across Northview Drive, and commercial land uses to the east. Because of the diversity of Project land uses in the area, the Project would not create a significant concentration of low-income or disadvantaged people in violation of HUD site and neighborhood standards and HUD Environmental Justice policies.

**Displacement**

The Project Site is currently vacant and does not contain any improvements apart from a chain-link fence that surrounds the Project Site. As such, the Project would not result in the removal of any

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7 IMPLAN is an economic impact analysis software that estimates a project’s potential direct and indirect economic impact with a defined area and over a defined period of time.
The Project would result in the construction of 66 new affordable housing units and one market rate manager’s unit on a vacant Project Site. Therefore, the Project would not result in displacement of any residents.

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

### Environmental Assessment

<table>
<thead>
<tr>
<th>Environmental Assessment Factor</th>
<th>Impact Code</th>
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</tr>
</thead>
<tbody>
<tr>
<td>COMMUNITY FACILITIES AND SERVICES</td>
<td>(2) No impact anticipated</td>
<td>The Project Site is located within the Sacramento City Unified School District (SCUSD), which serves over 42,231 students on 75 campuses that span 70 square miles. However, because the residential units associated with the Project would be studio units and would be reserved for households experiencing homelessness, 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, a dining and lounge area, deck, and courtyard 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>
</tr>
<tr>
<td>Educational and Cultural Facilities</td>
<td>(2) No impact anticipated</td>
<td>The Project would consist of the construction of 66 affordable housing units (studio units) and one market-rate manager’s unit on a currently vacant site. A wide range of retail and commercial services with a variety of price ranges exists within a one-half-mile radius of the Project Site, including the Northgate Boulevard corridor between Garden Highway to the south and Haggin Avenue (approximately one-half mile to the north). The commercial uses located along Northgate Boulevard include a supermarket, hardware store, general store, gas stations, restaurants, and a pharmacy. Further, public transportation is available on West El Camino Avenue, which is served by Sacramento Regional Transit District’s Route 88 bus route. This route provides access to downtown Sacramento and other regional commercial centers. Therefore, existing commercial facilities serving the Project</td>
</tr>
<tr>
<td>Commercial Facilities</td>
<td>(2) No impact anticipated</td>
<td></td>
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</tbody>
</table>

**References:**

Sacramento City Unified School District, Developer Fee Justification Report, March 2012.
Health Care and Social Services | (2) No impact anticipated
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Site are adequate and accessible and no adverse Project-related impact would occur.

There are no public hospitals serving the Project area; rather, Sacramento County contracts with private hospitals to serve area residents. The nearest hospitals with emergency services to the Project Site include the Sutter Medical Center and Mercy General Hospital, located approximately 2.5 miles and 3 miles south of the Project Site, respectively. These hospitals include emergency services and are located in downtown Sacramento, which would be accessible via transit.

The Sutter Medical Center is part of the not-for-profit Sutter Health group, which operates hospitals and medical centers in cities around Northern California (such as Berkeley/Oakland, San Francisco, Modesto, Davis, Antioch, Sacramento, and Santa Cruz). The Sutter Medical Center, located at 2825 Capitol Avenue, offers emergency services, internal medicine, and specialty medical services, in addition to cancer treatment programs, fertility services, kidney disease, liver care, diabetes services, orthopedic services, pediatric services, pregnancy and childbirth services, and physical therapy.

Mercy General Hospital is part of the Dignity Health group, which operates six hospitals in the greater Sacramento Area, as well as hospice centers, imaging centers, and home health centers. Mercy General Hospital, located at 4001 J Street, is a 343-bed hospital, which provides emergency services, an eye institute, home care services, and a preventative health center.

First-response emergency services are provided by the Sacramento Fire Department, which operates out of the Public Safety Center, located at 5770 Freeport Boulevard. The Sacramento Fire Department operates multiple engine companies evenly dispersed throughout the City, each with four personnel (a company officer, engineer, and two firefighters). The Project Site is served by Station No. 15, located at 1591 Newborough Drive, approximately 1.2 miles west of the Project Site. However, Station No. 15 provides an engine company and not medic or rescue services. The nearest station that provides medic services is Station 20, located at 2512 Rio Linda Boulevard, approximately 1.7 miles east of the Project Site. Therefore, adequate health care services, including emergency medical services, are available to serve the Project.

The Project may result in a minor increase in the population in the City of Sacramento, as discussed in previous sections. However, the Sacramento County Health and Social Services Department provides state and federally mandated benefits and services to low-income residents in Sacramento and Sacramento County. Such benefits and services include 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. Further, the Project would provide on-site conference and meeting spaces for social
workers and case workers to meet with Project residents. Therefore, adequate social services would be available to residents of the Project Site and no Project impacts are anticipated.

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

<table>
<thead>
<tr>
<th>Solid Waste Disposal / Recycling</th>
<th>(2) No impact anticipated</th>
</tr>
</thead>
</table>

As of 2011, the City of Sacramento generated over 420,000 tons of solid waste per year, including everything from recycling to construction demolition materials to garden refuse. The City of Sacramento collects approximately one half of this waste, with the remainder collected by private parties, such as franchise haulers. Refuse is conveyed to and disposed of at the Sacramento County Kiefer Landfill. The Kiefer Landfill is a Class III solid waste facility located in eastern Sacramento County, and has a total permitted capacity of 117.4 million cubic yards. According to the California Department of Resources Recycling and Recovery (CalRecycle), the Kiefer Landfill has a remaining capacity of 112.9 million cubic yards with a cease operation date of January 1, 2064.

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

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

References:
California Department of Resources Recycling and Recovery, Solid Waste Information System Facility/Site Activity Details: Sacramento County Landfill (Kiefer),
Waste Water / Sanitary Sewers | (2) No impact anticipated
---|---

Wastewater in the Sacramento area is collected by both the City and the County, depending on location. The Sacramento Regional County Sanitation District (Regional San) and the Sacramento Area Sewer District (SASD) provide both collection and treatment services for portions of the City of Sacramento. The SASD maintains about 35 percent of the public collection system within the City, while the City maintains the remaining 65 percent. The Project Site is located within the service area of the SASD, which provides wastewater collection services to approximately 270 square miles in the greater Sacramento area. The SASD network includes 3,100 miles of main sewer lines, 1,500 miles of lower lateral lines, 299,000 connections, and 106 pump stations and serves a customer population of 1.2 million people. Wastewater is collected by a local sewer system maintained by the City of Sacramento and conveyed to the SASD’s sewer system, then to the Sacramento Regional Wastewater Treatment Plant (SRWTP). The SRWTP manages the wastewater treatment needs for approximately 1.6 million people and treats over 150 million gallons of wastewater per day.

The SRWTP is permitted to treat an average dry weather flow of 181 million gallons per day (mgd). Once treated, some of the water is recycled, with the rest safely discharged into the Sacramento River. Further, Regional San’s EchoWater Project is upgrading the wastewater treatment plant by constructing nutrient removal facilities, installing nitrifying sidestream treatment equipment, and expanding existing filtration facilities. Once this expansion is complete in 2023, ammonia discharges from the SRWTP will be reduced by 99 percent and the SRWTP will produce more recycled water for use in irrigation.

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

The Proposed Project would be constructed on a currently vacant site and would result in 67 new dwelling units. As stated above, the SRWTP is permitted to treat an average dry weather flow of 181 mgd and, as of 2018, treats an average of 130 mgd. As such, the SRWTP has a capacity of 51 mgd. The Project, with an increase of 67 residential units, would not represent a substantial increase in the SRWTP’s service population of 1.4 million residents. Further, the City’s Sewer System Management Plan includes a System Evaluation and Capacity Assurance Plan, where the long-term needs of the City’s sewer infrastructure are periodically reviewed and addressed through 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.

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

**References:**
Sacramento Regional County Sanitation District, A Guide to the Sacramento Region’s Sewer Services, undated.

<table>
<thead>
<tr>
<th>Water Supply</th>
<th>(2) No impact anticipated</th>
</tr>
</thead>
</table>
| 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. The City is currently finalizing the 2020 UWMP; however, as the 2020 UWMP is a draft at the time of this Environmental Assessment, the following analysis is based on the final 2015 UWMP, adopted in June 2016. According to the 2015 UWMP for the City of Sacramento, the City provided water to 135,830 customer connections and supplied 86,031 acre-feet (AF) of water in 2015 to wholesale and retail customers (84,832 AF for retail customers and 1,199 AF for wholesale customers). Approximately 83 percent of the retail water supply is derived from the Sacramento River and the American River. The remaining water is derived from groundwater and mutual aid agreements (utilized in emergencies). Of the water provided to retail customers, the largest user in the City is single-family residential land uses, which account for approximately 42 percent of overall demand. Multifamily residential land uses account for approximately 17 percent of overall demand. Total retail water demand is anticipated to increase from 84,832 AF in 2015 to 123,229 AF in 2020. This is primarily due to the increase in population of the City’s water service area (a population of 480,105 in 2015 and an anticipated population of 528,866 in 2020). The UWMP projects that, under normal year supply and demand scenarios, supply would exceed demand in 2020, 2025, 2030, and 2035 by between 132,390 AF and 152,668 AF. These values are unchanged when evaluating the multiple dry year scenario.8 This is because the City is allowed to divert the same amount of water from the American River and the Sacramento River so long as the total combined

8 Although the 2020 UWMP is in draft form as of the preparation of this Environmental Assessment, the preliminary findings show that supply would exceed demand in 2025, 2030, 2035, 2040, and 2045 by between 198,436 AF and 235,391 AF. Thus, it is anticipated that the City would have sufficient water supplies based on the draft 2020 UWMP.
diversion from both rivers does not exceed the maximum combined diversion specified in an existing water rights settlement reached between the City and US Bureau of Reclamation. Therefore, based on current management practices, the City would have sufficient water supplies to serve the Proposed Project.

References:

<table>
<thead>
<tr>
<th>Public Safety - Police, Fire and Emergency Medical</th>
<th>(2) No impact anticipated</th>
</tr>
</thead>
</table>

**Police**
The Proposed Project would be served by the City of Sacramento Police Department. The police department has multiple facilities located throughout the city within four area commands (North, Central, East, and South). The Project Site is located in the North area command. The nearest Sacramento Police Department facility to the Project Site is the Richards station, located at 300 Richards Boulevard (approximately 1.3 miles southwest of the Project Site). However, the Richards station is located within the Central area command. The nearest police station within the North area command is the Kinney Station, located at 3550 Marysville Boulevard (approximately 3 miles northeast of the Project Site). Overall, the Sacramento Police Department supports 1,052 full-time equivalent positions (751 sworn and 301 civilian) according to the most recently available annual report (2016). The median response time for priority service calls has increased from 0:08:05 in 2011 to 0:09:57 in 2016. This increase is partially due to an increase in calls for service, as well as increasing traffic congestion coincident with the increasing population of Sacramento.

As stated above, the Proposed Project would develop 66 studio apartments for low-income households experiencing homelessness. The Project would also include one market-rate manager’s unit. As stated above, while the average household size in Sacramento is 2.7 persons per household according to the California Department of Finance, studio units could have a maximum of two persons per unit. Therefore, the Project could result in an increase of up to 135 persons to the population of Sacramento; however, the actual increase in the City’s population would likely be lower as it is unlikely that every studio apartment would house two persons and further unlikely that all residents would relocate from outside of the City of Sacramento. Regardless, an increase of 135 persons to the City of Sacramento would represent approximately 0.16 percent of the 2035 General Plan’s planned population growth between 2025 and 2035.

Further, the Project would not present any unique features or

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9 66 studio units * 2 persons per unit = 132. 2.7 persons per household * one -market rate manager’s unit = 2.7. The total would be 134.7 or 135 persons.
operational aspects that could reasonably be expected to result in an increased need for police facilities. Additionally, the 2035 General Plan contains Policy PHS 1.1.4, which mandates that the City of Sacramento’s police services keep pace with all development and growth within the City to ensure that adequate facilities and staffing are available to serve residents. Therefore, given the relatively small increase in population associated with the Project, and the lack of design features that would create public safety concerns, adequate police protection would be provided to the Project with existing and planned resources.

**Fire**

Fire protection and emergency services are provided by the City of Sacramento Fire Department. As stated above, the Project Site is served by Station No. 15, located at 1591 Newborough Drive, located approximately 1.2 miles west of the Project Site, which provides an engine company, but not medic or rescue services.

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. Further, the Project Site is not located within or adjacent to a Very High Fire Hazard Severity Zone as designated by the California Department of Forestry and Fire Protection’s Fire and Resource Assessment Program.

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

**Emergency Medical Services**

See the Health Care and Social Services discussion, above.

**References:**


City of Sacramento, 2035 General Plan.
### Parks, Open Space and Recreation

| (2) No impact anticipated | The Project Site is located approximately 600 feet southeast of Ninos Park, a neighborhood park operated and maintained by the City of Sacramento, which is 4.18 acres in size and includes amenities such as a playground, basketball court, soccer field, and open lawn areas. Immediately west of Ninos Park is the Ninos community garden, which includes 36 plots and an additional 4 plots that are accessible for disabled persons. Ninos Park is also the southern terminus of the Ninos Parkway, which is a landscaped parkway that runs north/south within the right-of-way of overhead electrical transmission lines and includes an off-road bike path and walkway that runs from Ninos Park, north 1.2 miles to San Juan Road, thus connecting Ninos Park and the community garden to amenities such as Rio Tierra Park, Rio Tierra Junior High School, Strauch Elementary School, and Strauch Park. Because the Proposed Project would not result in substantial population growth, as discussed previously, and given the proximity of multiple recreation assets to the Project Site, the Project would not warrant construction of additional park space, nor would it result in substantial deterioration of any existing recreation facilities. Given the relatively small increase in population associated with the Project, as well as the Project’s close proximity to existing recreation assets, the Project would not result in adverse impacts to the existing municipal park system. |

### Transportation and Accessibility

| (2) No impact anticipated | The Project would result in both short-term and long-term impacts to transportation and accessibility. For short-term impacts, Project construction would consist of grading, paving, construction, and painting. Project-related construction activities (and construction-related traffic) would occur during daylight hours on an intermittent basis, depending on the scope and intensity of the work taking place. While construction traffic would temporarily affect traffic flow on the surrounding street network, particularly along the truck haul routes, the impacts would be temporary and would fluctuate in intensity throughout the construction day and vary throughout the overall construction program, with less traffic generated in phases following construction. Because the construction traffic impacts associated with the Proposed Project would be temporary and would largely occur during off-peak hours, they would not significantly affect the performance of the vehicular transportation network with respect to level of service standards or other metrics related to congestion and travel delay. Project-related long-term traffic impacts include the impact of resident, visitor, and delivery/service vehicles. As of July 1, 2020, transportation impact assessments prepared in |

References:  
City of Sacramento, 2035 General Plan Education, Recreation, and Culture Element, March 2015.  
City of Sacramento, Citywide Development Impact Fee Program, July 23, 2021.
accordance with the California Environmental Quality Act 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 Sacramento has not adopted guidelines to set new significance criteria for transportation impacts based on VMT for land use projects, the California Governor’s Office of Planning and Research (OPR) published a technical advisory that includes recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures. The OPR technical advisory suggests that lead agencies may screen out VMT impacts using project-specific characteristics, such as project location, transit availability, and provision of affordable housing. Specifically, the OPR technical advisory states that affordable housing development in infill locations generally improves jobs-housing match and, in turn, shortens commutes and reduces VMT. Further, 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 OPR guidance states that “evidence supports a presumption of less than significant impact for a 100 percent affordable residential development in infill locations.” 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, not all residents would own or be permitted to store a vehicle while living at the Project Site, as there are only 14 total parking spaces for the 67 total residential units. Further, the Project’s location, close to commercial uses and transit options, 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 on the west and east sides of Northview Drive, bus stops for Sacramento Regional Transit located along Northgate Boulevard (Bus Route 13) and West El Camino Road (Bus Route 88), and the bike and pedestrian pathway (Ninos Parkway) that connects nearby parks to parks further north.

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

References:
Governor’s Office of Planning and Research, Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018.
Sacramento Regional Transit, Transit Services Map, July 2021.
NATURAL FEATURES

<table>
<thead>
<tr>
<th>Unique Natural Features, Water Resources</th>
<th>(2) No impact anticipated</th>
</tr>
</thead>
</table>
| The Project Site is a flat, 1.23-acre group of two parcels located in a highly urbanized area. As stated above, the Project Site is characterized by non-native grasses as well as trees along the eastern Project Site boundary that range in size, species, and health. The grasses on the Project Site have been maintained (i.e., mowed). The Project Site is currently vacant and while it has been disturbed by past agricultural uses, the Project Site has never been developed. There are no surface water features, sole source aquifers, or other water resources on or adjacent to the Project Site, as noted above in the Sole Source Aquifers, Wetlands Protection, and Wild and Scenic Rivers sections of this Environmental Assessment. Further, there are no unique geological features on or adjacent to the Project Site that are of special social/cultural, economic, educational, aesthetic, or scientific value.

As the Project Site is located in an urbanized area, it is not part of a contiguous natural area or wildlife corridor. While the Project Site is currently undeveloped, it has been disturbed by past uses and/or management and does not contain any native plant communities. Additionally, the Project Site does not contain any wetlands or riparian habitat as identified by the National Wetlands Inventory and the Project Site is located outside of the areas identified by the County of Sacramento as potential mitigation areas for Swainson’s hawk. The Project is located near a known occurrence of Swainson’s hawk, which is described in further detail, below.

Therefore, because Project-related construction activities would take place on a site that has been disturbed by past land management activities, and because the Project Site is located within a fully urbanized environment that is surrounded by disturbed areas (such as sidewalks, residential buildings, religious and commercial uses, streetlights, and major arterial streets), the Project would not impact any natural features, water resources, or geologic features.

References:

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


Vegetation, Wildlife | (3) Minor Adverse Impact – May require mitigation |
|---------------------|-----------------------------------------------|
| The Project Site is located in a fully urbanized area, surrounded by existing multifamily development and religious/commercial land uses, and is characterized by managed non-native grasses. The Project would not damage or destroy existing remnant or endemic plant communities, nor would it result in the substantial disruption of wildlife, habitat alteration or removal, effects to rare species (including those that are considered threatened or endangered, as described in the Endangered Species section of this Environmental Assessment), or the proliferation of pest species. Due to the disturbed nature of the Project Site, the Site...
would not support special-status species listed by the US Fish and Wildlife Service, or species listed on the California Department of Fish and Wildlife’s Special Animals and Plants Lists, as described in the Endangered Species Act section of this Environmental Assessment.

However, there is one record of a Swainson’s hawk (which is listed as a threatened species by the State of California) occurring approximately one-half-mile west of the Project Site, according to the NBHCP (discussed in the Endangered Species Act section of this Environmental Assessment). Swainson’s hawk typically breeds in riparian forest habitat and is known for nesting in large trees along the Sacramento River in the Natomas Basin (preferring large valley oaks, cottonwoods, or willow trees). When large trees are unavailable, Swainson’s hawk is known to nest in smaller trees in urban areas. Swainson’s hawk forages for small mammals in grasslands and croplands that are common in the northern and western portions of the Natomas Basin. Given that Swainson’s hawk nesting and foraging behavior occurs throughout the Natomas Basin, part of the NBHCP conservation strategy is to both preserve habitat within an area designated as the Swainson’s Hawk Zone and protect habitats through provision of suitable trees and groves in proximity to upland foraging areas. The Swainson’s Hawk Zone encompasses an approximately one-mile-wide buffer along the east side of the Sacramento River for the length of the Natomas Basin. The Project Site is located approximately one mile east of the Swainson’s Hawk Zone, as designated by the NBHCP. Regardless, given the Project Site’s close proximity to the Sacramento and American Rivers, and the trees on the Project Site that are proposed for removal, there is potential for Swainson’s hawk to nest or forage over the Project Site. As such, mitigation in the form of a preconstruction survey is required to determine if Swainson’s hawk is present on the Project Site prior to ground-disturbing activities.

As previously discussed, the Project Site includes nine trees located along the site’s eastern boundary that vary in size, species, and health. Of these nine trees, four would be removed by the Project. The trees proposed for removal include two dead glossy privet trees, one holly oak with severe fire damage, and one English walnut that has major structural and health problems. The remaining five trees would be incorporated into the Proposed Project. The trees proposed for removal may provide nesting sites for migratory birds and raptors, such as Swainson’s hawk. 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 (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 the
trees located on the east side of the Project Site in the spring and summer. Therefore, impacts to nesting birds protected by the Migratory Bird Treaty Act could occur if vegetation removal were to occur during nesting season (March 1 to August 31).

While migratory bird species are considered highly mobile and would naturally avoid areas with loud construction noise, removal of active nests would result in the potential for minor impacts. Therefore, Mitigation Measure WILD-1, described below, would protect nesting birds, including migratory birds and Swainson’s hawk, during Project-related tree removal and construction activities, and would ensure that the Project would be consistent with the Migratory Bird Treaty Act.

With implementation of Mitigation Measure WILD-1, Project-related impacts on vegetation and wildlife species would be less than significant.

**Mitigation Measure WILD-1**

Tree removal should not occur during the local nesting season (February 1 to September 15 for nesting birds and Swainson’s hawk and February 1 to June 30 for other nesting raptors), to the extent practicable. If ground clearing activities occur during the bird nesting season identified above, a nesting bird survey shall be conducted by a qualified biologist prior to commencement of grading or removal of any trees on the property. A copy of the survey shall be provided to SHRA. If the biologist determines that nesting birds (including evidence of nesting Swainson’s hawk) are present, restrictions will be placed on construction activities in the vicinity of the nest observed until the nest is no longer active, as determined by the biologist based on the location of the nest, type of the construction activities, the existing human activity in the vicinity of the nest, and the sensitivity of the nesting species. Grading and/or construction may resume in this area when a qualified biologist has determined that the nest is no longer occupied, and/or all juveniles have fledged.

**References:**

California Department of Fish and Wildlife, State and Federally Listed Endangered, Threatened, and Rare Plants of California, October 2019.

City of Sacramento, Sutter County, and Natomas Basin Conservancy, Final Natomas Basin Habitat Conservation Plan, April 2003.

**Other Factors**

None Identified.

**Additional Studies Performed:**

Michael Baker International:


Additional Technical Studies


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:

City of Sacramento approvals required for the Proposed Project include site plan and design review for construction of a 67-unit affordable housing development in an R-3-R Zone.

Public Outreach [24 CFR 50.23 & 58.43]:

As part of the HUD 8-Step Decision Making Process, an Early Notice and Public Review of a Proposed Activity within a 100-year Floodplain was published in a local paper with general circulation (the Daily Recorder) on June 09, 2021. The purpose of the notice and public review was to notify the public that the SHRA determined that the Project Site is located within a 100-year floodplain, and that SHRA will be identifying and evaluating practicable alternatives to locating the action in the floodplain and the potential impacts on the floodplain from the proposed action, as required by Executive Order 11988, in accordance with HUD regulations at 24 CFR 55.20 Subpart C. Further, SHRA distributed the Early Notice and Public Review document described above to the agency’s standard distribution list, which includes local and regional stakeholders, such as the City of Sacramento, California State University Sacramento, Caltrans, SACOG, SMUD, Sacramento County, the Sacramento Business Journal, SMAQMD, Sacramento Regional Transit, Sacramento Metropolitan Fire District, the Sacramento Public Library, USEPA, and California Environmental Protection Agency (CalEPA). No public comments were received as part of this noticing requirement of the 8-Step Process.

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 also publish a Final Notice and Public Explanation of a Proposed Activity in a 100-year Floodplain, pursuant to 24 CFR 55.20(g). 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]:

[68]
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. The parcels immediately north and immediately south of the Project Site are vacant, but there are no known development projects underway on those parcels. The City of Sacramento’s draft 2021-2029 General Plan Housing Element identifies residential projects that are in the “pipeline” meaning that the projects are either seeking City entitlements or are actively pursuing construction. There are no “pipeline residential projects” in the vicinity of the Project Site (the nearest is located approximately 2.5 miles west of the Project Site). Therefore, there are no reasonably foreseeable projects within the immediate vicinity of the Project Site that would result in cumulatively considerable impacts.

The Proposed Project would involve construction of 66 units of affordable housing with an additional manager’s unit, as well as ancillary infrastructure (such as a surface parking lot and indoor and outdoor landscaping). As stated above, the Project’s construction- and operation-related noise would not generate noise levels that would exceed the City’s noise standards at the closest sensitive receptors. With regard to air quality, the Proposed Project would not result in short- or long-term air quality impacts, as emissions would not exceed the SMAQMD-adopted construction or operational thresholds. As evaluated above, the Proposed Project would not contribute a cumulatively considerable net increase of any non attainment criteria pollutant and, therefore, the Project’s incremental operational impacts would be less than cumulatively considerable. As such, the Project would not result in cumulatively considerable air quality or noise impacts.

Regarding potential transportation impacts, as discussed above, the OPR Technical Advisory states that “evidence supports a presumption of less than significant impact for a 100 percent affordable residential development in infill locations.”10 Since the Proposed Project would involve development of 100 percent affordable residential units and one manager’s unit 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 or multiple projects that are related either on a geographical or functional basis, or are logical parts of a composite of contemplated actions.

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

In addition to the Proposed Project, four alternative sites were considered as they generally met the size and price/availability criteria to accommodate the Proposed Project. The alternative sites are identified in Table ALT-1, below, which provides zoning and General Plan designations, as well as the flood hazard zones each site is located within.

<table>
<thead>
<tr>
<th>Alternative No.</th>
<th>Address</th>
<th>Zoning Designation</th>
<th>General Plan Designation</th>
<th>Flood Hazard Zone</th>
<th>FEMA Flood Insurance Rate Map</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>2112 Alhambra</td>
<td>C-2 SPD</td>
<td>Urban Corridor</td>
<td>Zone X - area</td>
<td>06067C0190H</td>
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</tbody>
</table>

10 Governor’s Office of Planning and Research, Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018.
Further, this alternative analysis takes environmental justice into consideration using the USEPA’s EJSCREEN tool, which provides a percentile score offering a perspective on how the selected site (and a surrounding 0.25 mile radius) compares to the entire state with regard to environmental justice issues, such as pollution and income levels. For example, if an alternative site location is at the 95th percentile statewide, this means that only 5 percent of the population of California experiences a greater impact than the average person located within 0.25 miles of the alternative project location under review.

Table ALT-2

<table>
<thead>
<tr>
<th>No.</th>
<th>Location</th>
<th>State Percentiles</th>
<th>Percent low income population</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Particulate Matter</td>
<td>Ozone</td>
</tr>
<tr>
<td></td>
<td></td>
<td>55</td>
<td>57</td>
</tr>
<tr>
<td>1</td>
<td>2112 Alhambra Blvd</td>
<td>46</td>
<td>49</td>
</tr>
<tr>
<td>2</td>
<td>3815 Florin Rd</td>
<td>91</td>
<td>90</td>
</tr>
<tr>
<td>3</td>
<td>3216 Northgate Blvd</td>
<td>81</td>
<td>83</td>
</tr>
<tr>
<td>4</td>
<td>2350 Northview Dr</td>
<td>55</td>
<td>57</td>
</tr>
</tbody>
</table>

Source: USEPA, EJSCREEN Reports, 2021.
Notes: 1. data are based on a one-quarter mile radius around the alternative site locations.
In general, Alternative No. 1 is located southeast of downtown Sacramento immediately northeast of the intersection of Interstate 80 (the Elvas Freeway) and Highway 50 (the El Dorado Freeway). The site is currently characterized by a single-story commercial building (a door and window supplier) and is surrounded by the two freeways identified above to the south and west and single-family residential homes immediately across Alhambra Boulevard to the east and across 30th Street to the north. Given that the site of Alternative No. 1 is already improved with a commercial building, construction of affordable housing at this location would involve demolition, in addition to construction activities and would, therefore, result in a greater amount of air quality and noise impacts associated with demolition equipment and activities. Further, the site does not have as many commercial amenities in close proximity as compared with the Project Site (such as recreational assets or commercial land uses, e.g., a grocery store, general store, pharmacy, or other commercial amenities). Additionally, this site’s close proximity to the Elvas Freeway and the El Dorado Freeway would result in a high ambient noise level on the site and the potential for decreased air quality from vehicle emissions on the two adjacent freeways. While this alternative site does have a lower percentage of low-income residents within one-quarter mile, as shown in Table ALT-2, above, the location next to two freeways creates noise and air quality concerns. For these reasons, this alternative site was rejected from consideration.

Alternative No. 2 is generally located in South Sacramento at the northwest corner of the intersection of Florin Road and Franklin Boulevard, and approximately 0.75 miles west of Highway 99 (Golden State Highway). Alternative No. 2 is a formerly developed site that is currently vacant and characterized by a large surface parking lot surrounded by chain-link fencing. There are a number of trees varying in species, size, and health, as well as areas of bare earth where former site improvements used to be located. The site was previously a car dealership and service location and large market, both of which stopped operation between 2007 and 2011, according to available aerial imagery. On-site improvements, such as buildings and overhead lights in the car lots, were removed between 2011 and 2014. As with Alternative No. 1, given the expanse of impervious surfaces that would need to be demolished and removed, this site would involve more intensive site preparation activities as compared with the Proposed Project Site, which would result in greater noise and air quality impacts associated with site preparation. Further, this location’s use history includes a car dealership with a vehicle service department, which included a leaking underground storage tank that required remediation, according to the State Water Resources Control Board (remediation of the site was completed in 2011). Additionally, while this location is near commercial and retail amenities along Franklin Boulevard and Florin Road, these are major roadways that could expose future residents to noise and air pollution associated with vehicle traffic. Finally, this site is located within a high poverty census track, which is reflected in the EJSCREEN values provided in Table ALT-2, above. For these reasons, this alternative is not the preferred alternative.

Alternative No. 3 is located on Northgate Boulevard, approximately 1 mile north of the Proposed Project Site. In general, the site is surrounded by Northgate Boulevard and single-family residential homes to the west, Winter Garden Avenue and commercial development to the north, single-family residential land uses to the east, and an autobody repair shop to the south. As shown in Table ALT-1, above, this alternative site is located within an SFHA (Zone A99). Alternative No. 3 is undeveloped and characterized by non-native grasses that appear to be maintained (mowed) and contains no mature trees. Aerial imagery shows that this site was developed with low-density development in the mid-1900s, which remained in place until around 2005, when site improvements were removed. Alternative No. 3 is located along a major roadway (Northgate Boulevard is a four-lane roadway), which may require noise attenuation to reduce the ambient noise levels of the area to normally acceptable levels. Further, the site is zoned RMX (residential mixed use), which would permit a mixed-use project that could include commercial or retail uses in addition to residential units, thus resulting in a greater number of vehicle trips and therefore greater operational emissions. Further, the owner of this site was unresponsive, thus reducing the likelihood that the site could be acquired for development. Therefore, given the site’s location on a major roadway, the site’s availability, and the flood hazards on the site, this alternative is not the preferred alternative.

[71]
Alternative No. 4 is located immediately north of the Project Site at 2350 Northview Drive. Similar to the Project Site, this site is currently vacant, is characterized by managed non-native grasses, and has a history of agricultural land uses on the site up until the mid-1900s. As shown in Table ALT-1, this alternative site is located within a SFHA (Zone A99) and has a zoning designation of R-2B Multifamily. As an R-2B zone, the site has a maximum allowable dwelling units per acre of 21, as compared with 30 dwelling units per acre permitted in the R-3 zone immediately south of this alternative site (the Project Site). This zoning difference is the only discernable difference between the Proposed Project Site and this alternative site. Given that Alternative No. 4 is subject to a more limiting zoning designation as compared with the Proposed Project Site, this alternative is not the preferred alternative.

Therefore, because the Project would meet SHRA’s goal to “develop, preserve, and finance a continuum of affordable housing opportunities for Sacramento City and County residents”\textsuperscript{11} and because the alternatives identified above would not substantially reduce environmental impacts as compared to implementing the Project on the proposed Project Site, 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 development. Over time, it is possible that the vacant site would be sold to another developer and developed with market-rate housing. As discussed in the Statement of Purpose and Need for the Proposal Section, above, the SHRA has documented a persistent demand for affordable housing. The No Action Alternative would not result in the beneficial effects associated with constructing affordable housing units near community resources, such as recreational assets and commercial land uses. Therefore, the Project is preferred over this alternative.

Summary of Findings and Conclusions:

After implementation of the mitigation measures included in this Environmental Assessment, as well as compliance with the federal, state, and local regulations discussed throughout this Environmental 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>
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| **Flood Insurance**       | **Mitigation Measure FI-1**  
Prior to expenditure of HUD funding, the Project developer shall provide a copy of the flood insurance policy declaration or a paid receipt for the current annual flood insurance premium and a copy of the application for flood insurance. The Project Developer shall maintain flood insurance coverage, which shall be continued for the life of the building, irrespective of the transfer of ownership, or until the Project Site is removed from a Special Flood Hazard Area, as determined by FEMA. The amount of flood insurance coverage must at least equal the total project cost or the maximum coverage limit of the National Flood Insurance Program, whichever is less. |
| **Historic Preservation** | **Mitigation Measure CUL-1**  
National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800  
Prior to Project-related ground-disturbing construction activities, the Project developer shall conduct a canine forensics search of the Project Site in order to identify any previously undocumented Native American burials. Following completion of the canine forensics search of the Project Site, the Wilton Rancheria may request development of a controlled testing plan. If requested, the Project developer shall develop and implement such a testing plan, to the satisfaction of Wilton Rancheria. Prior to finalization of the canine forensics report and any subsequent testing plan, the UAIC shall be given the opportunity to review and comment on the canine forensics report and testing plans.  
**Mitigation Measure CUL-2**  
The Project developer shall be required to retain and compensate for the services of a tribal monitor/consultant, who is approved by the Wilton Rancheria, to monitor ground-disturbing activities associated with Project construction. Upon discovery of any tribal cultural or archaeological resources, construction activities shall cease in the immediate vicinity of the find until the find can be assessed. All tribal cultural and archaeological resources unearthed by Project-related construction activities shall be evaluated by a qualified archaeologist and/or tribal monitor/consultant approved by the Wilton Rancheria. Ground-disturbing activities include, but are not limited to, pot-holing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching within the Project area. The on-site monitoring shall end when the Project Site grading and excavation activities are completed or when the tribal representatives and monitor/consultant have indicated that the site has a low potential for impacting tribal cultural... |
resources. If a find is determined by the qualified archaeologist and/or tribal monitor/consultant approved by the Wilton Rancheria to be eligible for listing on the National Register of Historic Places, then a treatment plan shall be developed and implemented to protect or preserve the resource.

Any human remains encountered during Project ground-disturbing activities shall be treated in accordance with California Health and Safety Code Section 7050.5. There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the County coroner has determined the manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation or to his or her authorized representative. Project personnel/construction workers shall not collect or move any human remains and associated materials. If the human remains are of Native American origin, the coroner must notify the Native American Heritage Commission (NAHC) within 24 hours of this identification. The NAHC will immediately identify a Native American most likely descendant to inspect the site and provide recommendations within 48 hours for the proper treatment of the remains and associated grave goods.

### Vegetation, Wildlife

**Mitigation Measure WILD-1**

Tree removal should not occur during the local nesting season (February 1 to September 15 for nesting birds and Swainson’s hawk and February 1 to June 30 for other nesting raptors), to the extent practicable. If ground clearing activities occur during the bird nesting season identified above, a nesting bird survey shall be conducted by a qualified biologist prior to commencement of grading or removal of any trees on the property. A copy of the survey shall be provided to SHRA. If the biologist determines that nesting birds (including evidence of nesting Swainson’s hawk) are present, restrictions will be placed on construction activities in the vicinity of the nest observed until the nest is no longer active, as determined by the biologist based on the location of the nest, type of the construction activities, the existing human activity in the vicinity of the nest, and the sensitivity of the nesting species. Grading and/or construction may resume in this area when a qualified biologist has determined that the nest is no longer occupied, and/or all juveniles have fledged.
**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: _______________________________ Date: July 30, 2021
Name/Title/Organization: Brent Schleck/Senior Environmental Planner/Michael Baker Intl.

Certifying Officer Signature: _________________________ Date:________
Name/Title: ________________________________________________

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