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

# **Project Information**

Project Name: Promenade Circle/Vista Nueva Home Key Project

Responsible Entity: Sacramento Housing and Redevelopment Agency

Grant Recipient (if different than Responsible Entity):

**State/Local Identifier**: The project site is located at 140 Promenade Circle in the City of Sacramento (APN: 225-2110-049).

Preparer: Sacramento Housing and Redevelopment Agency

Certifying Officer Name and Title: LaShelle Dozier, Executive Director

Grant Recipient (if different than Responsible Entity):

Consultant (if applicable): Gail M. Ervin, Ph.D., NCE

#### **Direct Comments to:**

Stephanie Green, Environmental Coordinator Sacramento Housing and Redevelopment Agency 801 12th St., Sacramento, CA 95814 Email: sgreen@shra.org or Telephone: 916-440-1302

#### **Project Location:**

The proposed project is approximately 2.29-acres site that contains a 117-unit hotel at 140 Promenade Circle, in the City of Sacramento, California (APN: 225-2110-049) (Figure 1).

The USGS Quadrangle is Taylor Monument and Rio Linda. The Township is 9 North, Range 4 East, Section 13.

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

The proposed project is the acquisition of a hotel to provide affordable residential housing. The project would convert 117 hotel rooms into permanent affordable supportive housing for eligible homeless and at-risk individuals (Figure 2). The units will be comprised of sixty-three (63) studio units, thirty-nine (39) 1-bedroom/1-bathroom units and fourteen (14) 2-bedroom/2-bathroom units. One 2-bedroom/2-bathroom unit will be reserved for the on-site manager.

No demolition will occur of the existing building. The project would house residents permanently after the renovation utilizing the current building and infrastructure for residential purposes while undergoing minor reconfiguration. Renovation will include new interior and exterior paint, new windows, new interior and exterior fixtures, new flooring, resurfaced cabinetry, and new appliances. These reconfigurations will include ensuring all units meet local, state, federal regulations meet residential building codes.

Indoor amenities include interior common space, a computer room and a multipurpose room that will include a kitchen available for group dining, social activities, celebrations, and community programs. There will also be laundry facilities throughout the building. There will be separate office spaces for resident services and property management to use for the provision services to meet with residents needed.

The landscape is designed to complement the overall project design and provide outdoor spaces for residents as well as pleasant views from the building to the exterior. Outdoor amenities will include the existing pool, and a social picnic area with BBQ and seating for gatherings. There will also be a playground area with turf and a tot lot.

Vehicle access to the property is located north and east of the site off North Freeway Boulevard. Pedestrian access to the site would be provided west off of Truxel Road.

Figures 1 and 2 showing the site are located at the end of this document.

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

The purpose of the acquisition is to provide affordable and permanent supportive housing to homeless individuals in the City of Sacramento. The recommended actions for the development are consistent with City of Sacramento policies to prioritize special needs housing and maximize the use of all appropriate state, federal, local, and private funding for the development of housing affordable for extremely low-, very low-, and low-income households, while maintaining economic competitiveness in the region. The project will target eligible homeless and at-risk individuals.

In addition, the project meets the City's projected "fair share" requirement to provide housing for all sectors of the community, and is consistent with the City's adopted goals, policies, and actions designed to meet the housing needs for low-income families and individuals.

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

The project site is approximately 2.29-acres and is currently occupied by a Staybridge Suites hotel at 140 Promenade Circle. The site consists of a four-story building, a pool, and an asphalt parking lot. The existing parking lot provides uncovered standard parking spaces with landscaping around the perimeter of the site. The existing hotel is currently owned by Staybridge Suites Sacramento Airport and includes 117 hotel rooms, and fitness center.

Driveway access to the property is located north and east of the site off North Freeway Boulevard. The site is in a commercial and retail center (Promenade at Natomas). In the vicinity, there is restaurants, professional offices such as law and tax accountants, banks, and other commercial businesses to the east and south. To the north and west there is an undeveloped parcel. In the immediate surroundings of the retail center is a Target shopping center to the north and a Walmart west of the site.

The area has good regional linkage via Interstate 80 and public transportation is provided by Sacramento Regional Transit (RT). Approximately 0.4 miles west from the site are the bus stops for RTs lines 11, 13, 113, and 180 all of which provide access to Light Rail, major medical centers, and other shopping in the vicinity at less than 30-minute intervals.

Grant Number	HUD Program	Funding Amount
M21-MP060210	HOME	\$4,125,000
B20MW060003	CDBG	\$1,720,000
E20MW060003	ESG (Acquisition and	\$1,673,000
	Construction)	
E20MW060003	ESG (Operating Reserve)	\$1,477,000

# **Funding Information**

#### **Estimated Total HUD Funded Amount:**

\$ 8,995,000

**Estimated Total Project Cost** (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$ 11,115,000

# 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.

<b>Compliance Factors</b> : Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE OI and 58.6	RDERS, AND	REGULATIONS LISTED AT 24 CFR 50.4
<b>Airport Hazards</b> 24 CFR Part 51 Subpart D	Yes No	The proposed project is located approximately 7.8 miles away from the closest civilian airport (Rio Linda Airport) and is not within a Runway Potential Zone/ Clear Zone (RPZ/CZ) or Accident Potential Zone (APZ).
		Exhibit 2-A
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No	The proposed project is located approximately 110 miles inland and is not within a coastal zone. California does not contain protected costal barrier resources.
		Exhibit 2-B
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes No	The project site is located within Zone A99 (an area of Special Flood Hazard without base flood elevation), panel FEMA panel 06067C0045J, effective 6/16/2015. Flood insurance will be required due to habitable structures located within the floodplain.
5154aj		Whereas the recipient will not take title of the property prior to funding, a mitigation measure has been adopted that requires proof of flood insurance on the property prior to issuance of an occupancy permit. Exhibit 2-C
STATUTES, EXECUTIVE OI & 58.5	XDEKS, AND	REGULATIONS LISTED AT 24 CFR 50.4
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes No	The project would be in an identified nonattainment area for PM2.5 (moderate) and 8- hour ozone (severe). However, emissions resulting from project construction and operation fall below the Sacramento Air Quality Management District (SMAQMD) screening levels. SMAQMD operational screening levels for low rise apartment projects are less than 740 units for ozone precursors, and 1,485 units for PM, with construction BMPs incorporated;

		control of fugitive dust is required by District Rule 403 and enforced by SMAQMD staff. The project would convert 117 existing hotel units on a developed site that falls well below the Sacramento Air Quality Management District (SMAQMD) screening levels for ROG and PM <sub>2.5</sub> (<35 acres construction, 740 units operational), even if it were new construction. Therefore, emissions would be far below SMAQMD's thresholds of significance, which are also well below the de minimus levels for federal conformity (65 pounds per day ozone precursor = 12 tons per year (SMAQMD), vs. the 25 tons (severe), and 15 tons per year PM <sub>2.5</sub> (SMAQMD) vs. 100 tons per year (moderate) federal de minimus threshold). The proposed project is thus exempt from federal general conformity requirements. Exhibit 2-D
Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)	Yes No	The proposed project is located 110 miles inland and is not within a coastal zone.
		Exhibit 2-E
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes No	A Phase I Environmental Site Assessment was conducted on the proposed project site. The Phase I did not identify any hazardous materials on site that can propose a threat to human health. The Phase I concluded that no further investigation is needed for the proposed project. Exhibit 2-F
Endangered Species Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes No	The project site is developed and contains a four- story building. The parking lot is asphalt pavement. There is landscape vegetation throughout the property, including mature trees. The project involves interior rehabilitation with minor outdoor construction of a tot lot and turf in a developed area and therefore would have no effect on biological resources. There is no sensitive habitat near the site. Development in the area was required to comply with the North Natomas Habitat Conservation Plan when the site was developed. Exhibit 2-G
Explosive and Flammable Hazards	Yes No	No above ground storage tanks were identified in a 1-mile radius around the project site.
24 CFR Part 51 Subpart C		Exhibit 2-H

<b>Farmlands Protection</b> Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes No	The proposed project site is fully developed and is not currently used for farming. According to the California Department of Conservation Division of Land resource Protection Farmland Mapping and Monitoring Program, the site does not meet the definition of prime or unique farmlands and is not of statewide or local significance. There is farmland of local significance adjacent to the proposed project site. The project involves interior rehabilitation and minor outdoor construction and would have no effect on the adjacent farmland. Exhibit 2-I
<b>Floodplain Management</b> Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes No	The project site is located within Zone A99 (an area of Special Flood Hazard without base flood elevation), panel FEMA panel 06067C0045J, effective 6/16/2015. An 8-Step Review process was completed and the project will have no effect on the floodplain. Exhibit 2-J
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes No	A search of the Native American Heritage Commission (NAHC) Sacred Lands File was initiated for the project area on August 31, 2021, and a response has not yet been received. Pursuant to Section 106, consultation has been initiated with Native American Tribes in the region using existing lists, to solicit feedback regarding potential Native American resources within or in proximity to the project site. Follow up phone calls have been conducted. Tribal letters that were sent out are provided as Exhibit 1-A. No response has been received to date. An updated records search of the project site was conducted by the North Central Information Center and indicated that the survey lies within the Reclamation District; no historic resources were identified on site and the entire area has been developed as part of the North Natomas Community Plan area within the last 20 years. SHRA has determined that the undertaking would have no effect on historic properties. SHPO concurrence with this determination was received on October 8, 2021. Exhibit 2-K
Noise Abatement and Control	Yes No	The project site is not new construction for residential use, a major or substantial

Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B		rehabilitation of an existing residential property, or a research demonstration project; thus, it is exempt from noise abatement and control.
-		Exhibit 2-L
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	Yes No	According to the Environmental Protection Agency (EPA) SSA interactive online map, the project location does not lie above a sole source aquifer. Exhibit 2-M
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	Yes No	According to the National Wetlands Inventory (NWI) interactive online map, the proposed project is not located on a wetland identified by the U.S. Fish and Wildlife Services. A Riverine feature is approximately 1 mile away from the proposed project on the other side of a vacant lot. The project involves interior minor rehabilitation only and would have no effect on nearby wetlands. Exhibit 2-N
Wild and Scenic Rivers		The American River is located approximately 3
Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes No	miles south of the project and is considered a National Wild and Scenic River System (NWSRS) river. The project involves interior minor rehabilitation only and would have no effect on any river.
		Exhibit 2-O
ENVIRONMENTAL JUSTIC	E	
Environmental Justice Executive Order 12898	Yes No	The proposed project would provide permanent supportive housing units to homeless individuals in a high quality, modern building near services. The project would convert the existing extended stay hotel units into affordable units that would provide new and affordable housing within the City of Sacramento. The surrounding area includes commercial developments. No adverse environmental issues have been identified for the site. Exhibit 2-P

**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

Environmental	Impact	
Assessment Factor	Code	Impact Evaluation
LAND DEVELO	PMENT	
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The proposed project is zoned as EC-50-PUD Employment Center Planned Unit Development zone. The project would rehabilitate existing extended stay hotel units and convert them into permanent supportive housing for homeless. The use is consistent with the City's zoning and the general plan. Refs 2, 3, 4
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	The topography of the site is relatively flat. The project plans to improve the interior of the building. The project involves interior rehabilitation with minor landscaping and addition of a tot lot, and would have minimal effect on soils, erosion, or drainage. Refs 1, 3
Hazards and Nuisances including Site Safety and Noise	2	No above ground storage tanks were observed within a 1-mile vicinity of the project area. The Phase I did not find any environmental hazardous on site that could pose a threat to human health. Exhibit 2-F
Energy Consumption	2	Electric services are provided by the Sacramento Municipal Utility District (SMUD). The rehabilitation would meet all minimum construction standards for California including sustainable building methods and energy efficiency requirements. Ref 4

Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOM	IIC	
Employment and Income Patterns		Temporary construction jobs would be generated during the minor interior and exterior improvements of the project. The project will provide three full time supportive service coordinators, one program manager and a part time adult educational and health and wellness employee.
		Ref 1

Demographic	2	The project would provide 117 units of permanent supportive
Character Changes,		housing for people and families experiencing homelessness. The
Displacement		demographic character would change from transient hotel uses to
1		permanent housing, which would be a minor change in
		demographics of the residents, but not character, nor would
		permanent residents be displaced.
		Ref

Environmental	Impact	
Assessment Factor	Code	Impact Evaluation
<b>COMMUNITY F</b>	ACILITIE	S AND SERVICES
Educational and Cultural Facilities	2	The proposed project would convert an existing hotel into 117 residential housing units. The Natomas Unified School District serves the project site; the site is served by Jefferson School for elementary and middle school and Natomas High School. It is unknown how many children may reside at the complex. The District ensures adequate school capacity to serve all children through development impact fees. Refs 3, 5
Commercial Facilities	2	The project area is surrounded by commercial businesses. A Best Buy, Fed Ex and restaurants are adjacent to the project site, and commercial facilities are located throughout the area, with accessible public transit to further services. Ref 1
Health Care and Social Services	2	Sutter Medical Group is located 2.1 miles northeast and is a full- service medical center. Supportive services will be provided on site. Ref 1
Solid Waste Disposal / Recycling	2	Rehabilitation would generate some construction waste and removal of debris. The residential uses would generate mixed waste consistent with levels currently generated by the hotel uses. Construction waste would be disposed of at the Sacramento County Landfill facility on Kiefer Road, which is the primary municipal solid waste disposal facility in Sacramento County. Residential waste would be transferred by franchised haulers authorized by the Sacramento Solid Waste Disposal Company to collect commercial garbage and commingled recycling within the City. Ref 3
Waste Water / Sanitary Sewers	2	Wastewater is conveyed through the Sacramento Area Sewer District sewer pipelines to the Sacramento Regional Wastewater Treatment Plant (SRWTP). As of 2010, the SRWTP system received 151 million gallons per day (mgd) with a maximum capacity of 181 mgd. The SWRWTP has determined it has enough long-term capacity for general plan buildout within the region due to increased water conservation efficiencies and requirements, and a continuing reduction in per capita wastewater demand. Conversion to permanent housing is not anticipated to change wastewater generation from the site. Refs 3, 6

Water Supply	2	Water would be provided to the project site by the City of Sacramento Department of Utilities. The City has sufficient water rights and supply to meet General Plan Buildout. Conversion to permanent housing is not anticipated to change water usage at the site. Ref 4
Public Safety - Police, Fire and Emergency Medical	2	Police:The Sacramento Police Department provides police protectionservices to the City. The police department is locatedapproximately 5.3 miles east of the site. Conversion to permanenthousing is not anticipated to change current demand levels.Fire:Sacramento Metropolitan Fire Department. The closest station tothe project site is Fire Station 18, located approximately 2.3 milesnortheast from the project site. Rehabilitation would meet currentfire standards and conversion to permanent housing is notanticipated to change current demand levels.http://www.cityofsacramento.org/Fire/About/Station-InformationEmergency Medical Services:Sacramento Metropolitan Fire District. All SFD Engine andTruck Companies are utilized as EMS first responders and staffedwith Firefighter-EMTs and/or Firefighter-Paramedics. Conversionto permanent housing is not anticipated to change current demandlevels.http://www.cityofsacramento.org/Fire/Operations/Emergency-Medical-Services
Parks, Open Space and Recreation	2	Refs 1,3 Linden Park is located approximately 1 mile northwest of the site and is accessible by public transit. Chuckwagon Park is located approximately 1.6 miles south of the site. Although conversion to permanent housing could minimally increase demand for services, the increase is minor and can be accommodated at the existing parks. A playground is proposed on site. Refs 1, 4
Transportation and Accessibility	2	Sacramento Regional Transit Systems (RT) provides service to the project area via Bus Route 11, 13, 113, 180, all of which provide access to Light Rail, major medical centers, and other shopping in the area at less than 30-minute intervals. Ref 7

Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATU	RES	
Unique Natural Features, Water Resources		The site contains a four-story building, a pool, and an asphalt paved parking lot. No unique natural or water resources features are on the project site.
		Exhibits 2-G, 2-N,2-O

Vegetation, Wildlife	2	The site is fully developed. No unique vegetation or wildlife features are on the project site. Exhibit 2-G
Other Factors	1	The proposed project has been reviewed for consistency with the goals, policies and targets of the Sustainability Master Plan and the 2030 General Plan. If approved, this Project will advance the following goal, policy, and target of goal number one – Energy Independence, specifically by reducing the use of fossil fuels and providing long-term affordable housing and a reduction in vehicle miles travelled through infill housing development. Refs 1, 3, 4

#### Additional Studies Performed:

No additional studies were performed. **Field Inspection** (Date and completed by):

1. Field observation conducted by Catrina Vaz, NCE, September 2, 2021.

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

- 1. Unless otherwise noted, assessments based upon expertise and experience of Gail M. Ervin, Ph.D., NCE.
- City of Sacramento. 2021. Current through Ordinance 2021-0025, effective September 16, 2021. Accessed on 10/8/2021 from: <u>http://www.qcode.us/codes/sacramento/view.php?topic=17</u>
- City of Sacramento. 2015. 2035 General Plan. Accessible from: <u>http://www.cityofsacramento.org/Community-Development/Resources/Online-Library/2035--</u> <u>General-Plan Accessed on 9/2/2021</u>
- City of Sacramento. 2012. Sustainability Climate Action Plan. Accessed from: <u>https://www.cityofsacramento.org/Community-Development/Resources/Online-Library/Sustainability Accessed on 9/2/2021</u>
- Natomas Unified School District. 2021. School Locater. Accessed from: <u>School Locator –</u> <u>Natomas Unified School District</u> Accessed on 9/5/2021
- Sacramento Regional County Sanitation District. Sacramento Regional Wastewater Treatment Plant. Accessible from: <u>https://www.regionalsan.com/profile/sacramento-</u> regionalwastewatertreatment-plant Accessed on 9/5/2021
- 7. Sacramento Regional Transit. 2018. Systems Map" Accessed on 9/5/2021 from: http://www.sacrt.com/systemmap/A1.stm

#### List of Permits Obtained:

An occupancy permit issued by the City of Sacramento will be required.

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

Due to the Covid-19 pandemic, community outreach for the proposed project has been conducted through in person meetings, phone meetings, distributed written materials, and a webpage. The proposed project webpage allows individuals to sign up for additional information about the Vista Nueva development and provide numerous links to information about permanent supportive housing and the Jamboree Corporation. The webpage can be accessed here:

https://www.affordablehousingpipeline.com/blogs/california-affordable-housing/vista-nueva-sacramento

The existing hotel Staybridge Hotel is subject to Codes, Covenants and Restrictions (CC&R) that are recorded against the property and the two adjacent property owners, Fieldstone LLC, and Kaiser Permanente. Jamboree has met with the property owners on August 30, 2021, September 8, 2021, and September 23, 2021. The property owners were provided details about the services, property management, and security features about the Vista Nueva development.

Jamboree has also meet with Fairbourne Properties to solicit feedback from the owners. Fairbourne properties are the owners of the adjacent commercial developments that include Target, Barns and Noble, Ulta and Old Navy. Jamboree met with them on September 16, 2021, and September 22, 2021. Details about the services, property management, and security features of the Vista Nueva development were distributed. The issues discussed included the family nature of the tenancy and the fact that many residents would likely have cars and not depend on public transportation.

A Finding of No Significant Impact and a Notice of Intent to Request Release of Funds will be published in a paper of general circulation 15 days before the RROF will be submitted to HUD and HCD to allow public comment on the project. The public will have 15 days to provide comment to HUD and HCD for anyone who wishes to challenge the bases for the FONSI determination

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

The proposed project is the conversion of a hotel to affordable housing units for individuals and families experiencing homelessness in the City of Sacramento. Currently, the site has one four-story building that is being used as a hotel, a pool, and an asphalt parking lot. The project proposes to convert the hotel units to 117 permanent and supportive housing units for unhoused individuals and families in need. The project is consistent with City zoning and general plan policies. Minor air emissions related to interior rehabilitation would be temporary, and operational emissions would be below SMAQMD screening criteria; SMAQMD has determined that projects below these thresholds result in a less than cumulatively significant effect. The project contains standard uncovered parking lots and is within walking distance of bus services. Operational impacts related to traffic are anticipated to be similar to or less than existing conditions and cumulatively less than significant. There are minor exterior improvements proposed for the fully developed site, thus the project would not result in a cumulative loss of biological or cultural resources. Therefore, the proposed project would result in no cumulatively significant effects on the human or natural environment.

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

Site identification for affordable housing has proven to be a major obstacle in providing affordable housing units. Sites zoned appropriately and at reasonable cost are extremely limited within City of Sacramento. The site was selected based on criteria for the Homekey Program. The Program looks for hotels available for purchase that can be occupied immediately as permanent and interim affordable housing. The rooms needed to be in good physical condition and available for purchase, and sites with units with bathrooms and kitchens were preferred.

There are no adverse effects on the human or physical environment associated with the preferred alternative, and there are benefits to the human environment by converting the existing hotel units to permanent housing units for individuals and families experiencing homelessness.

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

The No Action Alternative would leave the four-story building as a commercial hotel and would fail to provide needed additional and affordable housing units on a suitable site. There are no benefits to the physical or human environment by taking no federal action for this project. Physical impacts to the environment occurred when the building was constructed, and vehicle miles traveled would be similar or less than the current hotel use.

The City has determined the project it is consistent with all City land use plans, policies, and regulations for the project site. Not converting the hotel to permanent supportive housing on this site could result in more housing constructed further out from the City core to meet the demand for affordable housing, contributing to urban sprawl, regional traffic congestion and regional air quality problems.

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

The environmental assessment has determined that the construction of the Promenade Circle/Vista Nueva Homekey Housing project would have no adverse effect on the human or physical environment. The project would convert hotel units to low-income permanent housing units. The project would consist of 117 permanent housing units for homeless individuals and families on site. The conversion of hotel units to permanent housing is consistent with adopted plans and policies, and the interior rehabilitation would not generate adverse effects on the human or natural environment. Whereas the site is already used for extended stay hotel uses, there would be no change in demand for municipal services. The surrounding vicinity has transit access to a full range of commercial, medical, emergency, social and recreational services to serve the future residents. There are no hazards located near or within the vicinity of the project site. The project would therefore have a beneficial effect on the quality of the human environment and no adverse effect on the natural environment

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

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

Law, Authority, or Factor	Mitigation Measure
<b>Flood Insurance</b> Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Concurrent with construction loan closing, the applicant will obtain flood insurance for the property and provide verification to the City of Sacramento.



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#### **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:

Fiel Mr. Em

\_\_\_\_\_Date: 10/13/21

Name/Title/Organization: Gail M. Ervin, Ph.D., Principal, NCE

Certifying Officer Signature:

Date:\_\_\_\_\_

Name/Title: La Shelle Dozier, Executive Director

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).



