

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

**Project Information**

**Project Name:** Sutter House Motel Conversion 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

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916-440-1302

## **Project Location:**

The Project Site is bound by H Street to the north, 12<sup>th</sup> Street to the east, Terminal Way to the south, and 11<sup>th</sup> Street to the west. The Project Site is rectangular in shape and contains two adjacent parcels (Assessor's Parcel Numbers 006-0045-002 and -003), totaling approximately 1.1 acres in size. A Regional Location Map and a Project Location Map are provided respectively as **Figure 1** and **Figure 2**.

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

The Proposed Project would consist of the conversion of an existing motel property containing a motel building, shown in **Figure 3**, and a detached restaurant building located in downtown Sacramento into an affordable housing community with the restaurant building providing space for resident services. The existing motel would be converted from 94 motel rooms to 92 affordable residential units and a one-bedroom manager's unit. Each of the 92 affordable units would be 424-square-foot studio units and would include a full bathroom and a new kitchenette with sink, two-burner electric stove, refrigerator, and microwave. The remaining two hotel rooms would be combined into a 652-square-foot, one-bedroom, one-bathroom manager's unit. Other proposed rehabilitation activities include upgrading the electrical system to meet new electrical demands (i.e., from addition of kitchenettes in each studio); replacing carpeting with vinyl tile; new bedroom and common area furniture throughout; and installing packaged terminal air conditioners (PTACs) in each unit to provide efficient heating and air conditioning. The existing central heating and air conditioning units would be disconnected and removed as part of the Project. The 92 affordable units would be restricted to rental units with future residents meeting a maximum 30 percent area median income (AMI) limit. Additionally, the interior of the motel structure would be sealed and painted. There would be minimal alterations made to the exterior of the motel structure, apart from removal of the existing motel signage and painting of the exterior of the structure. The existing pool and pool deck would be maintained.

The parking available on the ground floor of the motel structure would be maintained; however, the surface parking lot on the northern portion of the Project Site would be converted to a proposed dog park, sports gaming area, and an outdoor seating area. A designated smoking area would be installed in the existing parking area on the ground floor of the motel structure, which would include seating and lighting. Additional changes to the Project Site would include installation of perimeter fencing (i.e., extending the existing wrought iron fencing so that it surrounds the Project Site), automated vehicle and pedestrian gates, and security camera systems to secure the site. The driveway onto 11<sup>th</sup> Street would be removed and primary vehicle access to the Project Site would be provided by the existing gated entrance onto Terminal Way on the south side of the Project Site. Construction of the outdoor amenities would involve grading up to 18 inches deep, which would be limited to the existing parking areas. Proposed outdoor upgrades to the Project Site are shown on **Figure 4**.

As proposed, only a portion of the restaurant structure would be utilized by the Project residents. The restaurant use would be removed from the Project Site. The first floor would be unimproved, while the second floor of the existing restaurant (which has stair and elevator access) would be renovated to provide space for resident supportive service programs.



0 5 10 Miles

**FIGURE 1**  
Regional Location Map

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0 350  
FEET

**FIGURE 2**  
Project Location Map





View of the pool area and the motel's interior from the third level of the existing motel structure, looking south.

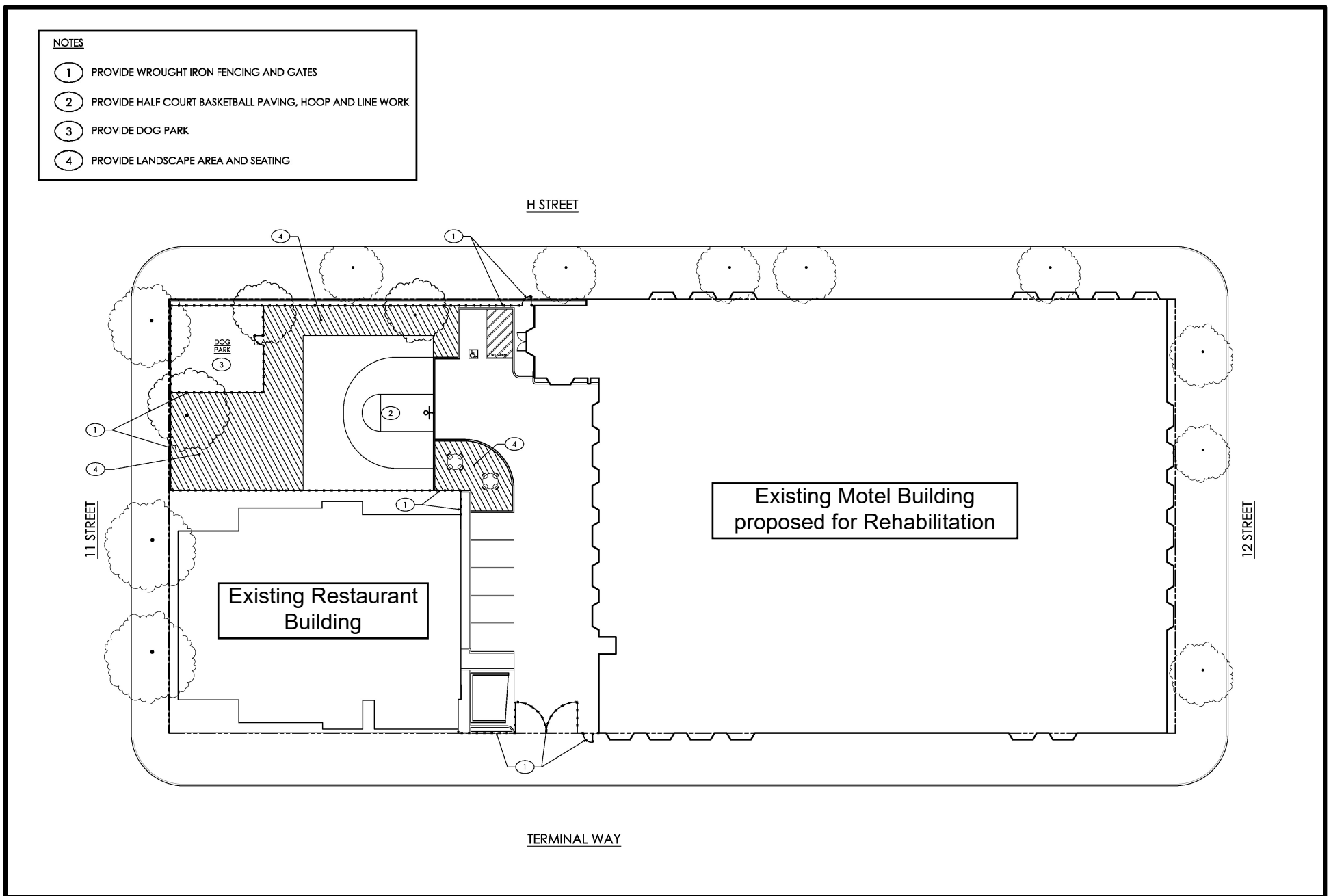


View of the motel's main entrance, looking southeast.

Source: TheSutterHouse.com

**FIGURE 3**  
Existing Conditions

**Michael Baker**  
INTERNATIONAL



Source: Pressey and Associates, 2021

**FIGURE 4**  
Project Site Plan



The construction process would take approximately 8 months, with a target opening year of 2022. Because the portions of the Project Site that would contain the proposed improvements (i.e., gazebo, gaming area, dog park, and smoking area) are already disturbed by existing surface parking, the Project would not require extensive grading to prepare for construction. The maximum depth of grading is anticipated to be 18 inches and would be limited to areas previously disturbed by the surface parking lot on the northwest side of the Project Site.

#### **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.”<sup>1</sup> The Proposed Project contributes toward this goal by providing new affordable housing, which would offer 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.

Further, the City of Sacramento’s General Plan Housing Element states that approximately 50 percent of the households in the City are extremely low-, very low-, or low-income households. By providing affordable housing, the Project is addressing a need for affordable housing, as identified in the City’s General Plan.<sup>2</sup> The annual median income (AMI) for a family of four in Sacramento County in 2021 is \$91,100.<sup>3</sup>

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

The Project Site is characterized by an existing three-story motel, constructed in 1975, and a two-story restaurant building constructed in 1977.<sup>4</sup> The motel building is square in shape with a rectangular pool and pool deck located within the motel building’s courtyard. The motel’s main entrance is located on the northwest side of the building, facing 11<sup>th</sup> Street, with sidewalk access to H Street, as shown in **Figure 3**. The main entrance is characterized by a short-gabled overhang supported by several white columns. The hotel structure is clad in taupe, textured stucco with beige siding and white accents around bay windows that protrude from each elevation, as shown in **Figure 3**. The ground floor of the motel includes the main entrance, lobby, and other amenities (e.g., business center and mechanical rooms) at the northwest corner of the building, as well as surface parking. The parking area is ventilated and covered with an ungated driveway accessing 11<sup>th</sup> Street, two gated vehicle access points on 12<sup>th</sup> Street, and one gated vehicle access point on Terminal Way. Each of the three metal gates surrounding the parking area are rolling gates with vertical black bars and decorative accents (i.e., pointed arrow tops and decorative metal vines and leaf accents). The second floor of the motel includes the pool and pool deck area, as shown in

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<sup>1</sup> Sacramento Housing and Redevelopment Agency, *Changing Lives: 2018 Annual Report*, page 6, [https://www.shra.org/wp-content/uploads/2019/12/2018%20Annual%20Report\\_final.pdf](https://www.shra.org/wp-content/uploads/2019/12/2018%20Annual%20Report_final.pdf).

<sup>2</sup> City of Sacramento, *Housing Element 2021-2029*, Appendix H-1 Community Profile, <https://www.cityofsacramento.org/Community-Development/Planning/Long-Range/Housing-Programs/Housing-Element>.

<sup>3</sup> California Department of Housing and Community Development, State income limits for 2021, April 2021.

<sup>4</sup> Sacramento County, Assessor Parcel Viewer, accessed September 27, 2021, <https://assessorparcelviewer.saccounty.net/jsviewer/assessor.html>.

**Figure 3**, with the motel rooms oriented in a square surrounding the pool area on floors two and three of the motel. The motel has mechanical equipment located on the southeast corner of a white, flat roof that rises to a height of approximately 30 feet. The main entrance of the motel at the northwest corner of the building is taller than the rest of the building at 40 feet and includes some grey-colored wooden shingle accents on the exterior that are not seen elsewhere on the structure. The motel currently has a golden reflective ‘S’ above the main entrance to signify the “Sutter House” motel and has two lighted signs on the first-floor corner of the building at the intersection of H Street and 12<sup>th</sup> Street, which display “Best Western PLUS” to identify the motel as part of the Best Western family of hotels. Additionally, a two-sided lighted sign is located on the northwest corner of the Project Site, which displays “Best Western PLUS Sutter House.” Other amenities at the motel include a breakfast room, fitness center, small event space (large enough to accommodate a 15-person conference), two electric car charging stations, and a secured motorcycle parking cage within the parking area.

The existing two-story restaurant building (address of 815 11<sup>th</sup> Street) is located at the southwest corner of the Project Site and is clad in beige stucco and vertical metal siding. Large portions of the southern and western elevations are covered in climbing ivy. The northern building elevation includes the main entrance covered by a red awning, bicycle racks, an accessible ramp, and a small patio surrounded by a short decorative metal railing. The restaurant structure is rectangular in shape and has an angular roofline sloping to the south, east, and north. Mechanical equipment on the roof is obstructed from view by being recessed into the roof on the southeast side of the restaurant building. The eastern elevation includes the loading area and a masonry block trash enclosure.

The Project Site includes a surface parking lot that serves both the motel and the restaurant. As previously stated, the parking area is accessed by an ungated driveway from 11<sup>th</sup> Street on the northwest side of the Project Site. This drive aisle runs from 11<sup>th</sup> Street to the covered parking area that makes up the majority of the first level of the motel structure. Eleven parking spaces are available on the north and south sides of the driveway between 11<sup>th</sup> Street and the covered motel parking area, and include two Americans with Disabilities Act-compliant spaces. Landscaping in the parking area includes small trees and shrubs located between the parking area and the sidewalk on the south side of H Street. The south side of H Street includes several mature trees and decorative shrubs/groundcover along the sidewalk, as well as streetlamps and metered parking spaces. The northern elevation of the motel building also includes short, manicured shrubs that obstruct views of the short brick wall and vertical metal bars that secure the parking area. All four sides of the Project Site are surrounded by sidewalks.

As stated above, the Project Site is bound by H Street to the north, 12<sup>th</sup> Street to the east, Terminal Way to the south, and 11<sup>th</sup> Street to the west. Across H Street to the north is a white brick single-story automotive repair building and a two-story office building. A 17-story office building is located to the west across 11<sup>th</sup> Street. A single-story automotive repair building and a small diner are located to the south across Terminal Way. A six-story, square office building is located across 12<sup>th</sup> Street to the east. North of the Project Site, H Street is a two-lane, one-way street running west to east. East of the Project Site, 12<sup>th</sup> Street is a three-lane, one-way street running north to south that also includes light rail service (the Sacramento Regional Transit Blue Line, which connects



downtown Sacramento to Cosumnes River College to the south and Watt/I-80 to the north). H Street also provides bus service (Route 129) during peak times.

## **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.

Grant Number	HUD Program	Funding Amount
#M21-MP060210	HOME	\$4,088,000

**Estimated Total HUD Funded Amount:** \$4,088,000

**Estimated Total Project Cost** (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$29,398,111

## **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
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6</b>		
<b>Airport Hazards</b>  24 CFR Part 51 Subpart D	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p>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 protect project residents from airport hazards.</p> <p>Airports designated by the Federal Aviation Administration as commercial airports in the National Plan of Integrated Airports are considered civilian airports subject to HUD Regulation 24 CFR 51D.</p>

		<p>As the Project Site is currently characterized by an existing motel structure, the Project would not result in an increase in the density of people at the Project Site. Regardless, the closest military airport to the Project Site is the Coast Guard Air Station Sacramento at McClellan Airfield, located approximately 6.5 miles (approximately 34,320 feet) northeast of the Project Site. The closest civilian airport is the Sacramento McClellan Airport, located approximately 6.5 miles (approximately 34,320 feet) northeast of the Project Site. The next nearest airport is the Rio Linda Airport, approximately 6.6 miles (approximately 34,850 feet) north-northeast of the Project Site.</p> <p>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.</p> <p><b>References:</b></p> <p>HUD, HUD Exchange, Airport Hazards, <a href="https://www.hudexchange.info/environmental-review/airport-hazards/">https://www.hudexchange.info/environmental-review/airport-hazards/</a>, accessed on October 11, 2021.</p> <p>Federal Aviation Administration, Report to Congress, National Plan of Integrated Airport Systems 2021-2025, Appendix B, September 2020.</p>
<p><b>Coastal Barrier Resources</b></p> <p>Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]</p>	<p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>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 (USFWS) within the State of California. Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary.</p> <p><b>References:</b></p> <p>US Fish and Wildlife Service, <i>Coastal Barrier Resources System, CBRS Mapper</i>, <a href="https://www.fws.gov/CBRA/Maps/Mapper.html">https://www.fws.gov/CBRA/Maps/Mapper.html</a>, accessed October 11, 2021.</p>
<p><b>Flood Insurance</b></p> <p>Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</p>	<p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>The Proposed Project would involve the conversion of an existing motel property into an affordable housing complex. According to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map (FIRM) for the Project area, the Project Site is not within a Special Flood Hazard Area as designated by FEMA. The Project Site is located in an area designated as Zone X, which is an "area with reduced flood risk due to levee." Therefore, per HUD guidance, because the Project is not located within a Special Flood Hazard Area, there are no formal compliance steps or mitigation required and no further analysis is necessary.</p> <p><b>References:</b></p> <p>Federal Emergency Management Agency, Flood Insurance Rate Map 06067C0180J.</p>



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

<p><b>Clean Air</b></p> <p>Clean Air Act, as amended, particularly section 176(c) &amp; (d); 40 CFR Parts 6, 51, 93</p>	<p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>Federally funded projects must conform to Clean Air Act requirements if they may constitute a significant new source of air pollution. If a project does not involve new construction, or conversion of land use facilitating the development of public, commercial, or industrial facilities, or five or more dwelling units, it can be assumed that emissions are below the US Environmental Protection Agency's (USEPA) de minimis threshold levels.</p> <p>The Proposed Project does not involve new construction other than outdoor gathering spaces (such as a dog park, gaming area, and outdoor seating area), none of which would result in any significant air quality pollutant emissions. Further, because the Project Site is currently characterized by an existing 94-room motel and an existing restaurant, the Project would not involve a conversion of land use that would facilitate development of commercial, industrial, public, or residents land uses of five or more dwelling units. This is because the existing motel use and the proposed residential use are functionally very similar from an environmental impact standpoint, as they both involve non-owner-occupied residential units that share common spaces with on-site care-taking staff. Because the Project would combine two of the existing motel rooms to create a one-bedroom manager's unit (resulting in 93 proposed residential units), the Project would result in a reduction of residential densities. While the Project would reduce residential densities and would remove the existing restaurant use from operation, Project-related construction and operation would generate minor amounts of air pollutants, as described in the following paragraphs.</p> <p><b><i>Construction Emissions</i></b></p> <p>The Project involves construction activities associated with demolition, ground disturbance, and construction. These construction activities would include the use of construction equipment (such as tractors, backhoes during grading, jackhammers to break apart asphalt, and loaders), which would generate exhaust emissions. Construction-related exhaust emissions would result from the transport of this machinery and equipment to and from the Project Site, the use of equipment on-site, and worker vehicle exhaust emissions. Construction activities that involve ground disturbance, such as grading, are also a source of air pollutants in the form of fugitive dust emissions, which can vary substantially from day to day, depending on the level of activity, specific operations, and weather conditions. However, with such a small area of disturbance and given the limited daily construction activities, impacts associated with fugitive dust are not anticipated to be substantial. Regardless, construction activities would be required to comply with the Sacramento Metropolitan Air Quality Management District (SMAQMD)-required best available control technology and best management practices, which include SMAQMD Rule 403, a</p>
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		<p>requirement that excessive fugitive dust emissions be controlled by regular watering or other dust prevention measures. In short, while Project construction would likely be the greatest source of Project-generated air pollutants, construction emissions would be temporary in duration and minor in scale. Therefore, emissions of these pollutants during Project construction would be clearly below SMAQMD's thresholds of significance.</p> <p><b><i>Operational Emissions</i></b></p> <p>Operational air quality impacts would be similar if not less than the existing land uses on the Project Site (a 94-room motel and restaurant). The existing outdoor pool would remain in use as is and the number of units would decrease through implementation of the Project. Further, the restaurant would no longer host outside visitors and vehicles at peak mealtimes but would rather be limited to providing social services primarily for on-site residents. As such, it is reasonable to assume that air quality impacts associated with the restaurant (which typically result from natural gas emissions from the kitchen and vehicle exhaust from employees and patrons) would be largely eliminated in the Proposed Project, as the proposed use of a facility for social services would eliminate the natural gas and char broiler emissions from the restaurant and would reduce the amount of vehicle trips to and from the site.</p> <p>Because the Project would not result in new construction or conversion of land use that would increase residential or commercial densities, it can be assumed that air quality pollutant emissions associated with the Project would be below USEPA de minimis threshold levels. Regardless, because construction emissions would be temporary in duration and minor in scale and operation would not generate substantial quantities of air quality emissions beyond those already generated at the site by existing conditions, Project-related activities would be clearly below USEPA de minimis threshold levels. 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</p> <p><b>References:</b></p> <p>HUD, HUD Exchange, Air Quality, <a href="https://www.hudexchange.info/programs/environmental-review/air-quality/">https://www.hudexchange.info/programs/environmental-review/air-quality/</a>, accessed on October 11, 2021.</p> <p>Sacramento Metropolitan Air Quality Management District, <i>Air Quality Pollutants and Standards</i>, <a href="http://airquality.org/air-quality-health/air-quality-pollutants-and-standards">http://airquality.org/air-quality-health/air-quality-pollutants-and-standards</a>, accessed October 11, 2021.</p> <p>US Environmental Protection Agency, <i>40 CFR Section 93.153, De Minimis Tables</i>, <a href="https://www.epa.gov/general-conformity/de-minimis-tables">https://www.epa.gov/general-conformity/de-minimis-tables</a>, accessed October 11, 2021.</p>
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<p><b>Coastal Zone Management</b></p> <p>Coastal Zone Management Act, sections 307(c) &amp; (d)</p>	<p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>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.</p> <p>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.</p> <p><b>References:</b></p> <p>California Coastal Commission, <i>Maps: Coastal Zone Boundary</i>, <a href="https://www.coastal.ca.gov/maps/czb/">https://www.coastal.ca.gov/maps/czb/</a>, accessed October 11, 2021.</p>
<p><b>Contamination and Toxic Substances</b></p> <p>24 CFR Part 50.3(i) &amp; 58.5(i)(2)</p>	<p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>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.</p> <p>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. While the DTSC does not identify the Project Site as a hazardous materials cleanup site, the DTSC's EnviroStor database identifies four hazardous material cleanup sites within one-half mile (2,640 feet) of the Project Site. All four of these sites were part of the Voluntary Cleanup Program and are located greater than one-quarter mile (1,320 feet) away from the Project Site. Two of the sites, one located at the intersection of 5<sup>th</sup> Street and I Street and the other bounded by 3<sup>rd</sup>, 7<sup>th</sup>, J, and L Streets, have been closed. The two active sites, one bounded by Government Alley, 6<sup>th</sup>, 7<sup>th</sup>, and G Streets and one located at 501 G Street, are active, but investigations and soil remediation have been completed pursuant to remedial action plans. Groundwater remediation is ongoing at both sites. The contamination at all four of these cleanup sites is due, at least in part, to the groundwater plume that extends from the downtown Sacramento Railyards. The Railyards-wide Soil and Groundwater Management Plan was approved by DTSC in 2015 and is currently being implemented. As the Project Site lies more than one-quarter mile from the nearest cleanup site, and because the Project would not involve ground disturbance that could potentially exacerbate any potential underlying contamination, these sites and the associated contamination from the Railyards would not negatively impact future residents of the Project.</p> <p>The State Water Resources Control Board's GeoTracker database identifies 20 leaking underground storage tank cleanup sites and one</p>

		<p>Cleanup Program Site located within one-half mile of the Project Site. Cleanup processes and testing at all 21 sites have been completed, with the State Water Resources Control Board listing each cleanup site as “case closed.” Given that cleanup has been completed at each of these sites, these sites would not negatively impact future residents of the Project.</p> <p>Additionally, a Phase I Environmental Site Assessment (Phase I ESA) was completed for this Project by AEI Consultants, on October 1, 2021. This Phase I ESA determined that there were no environmentally sensitive occupancies of the Project Site noted in City Directories or building records going back to the Project Site’s use as residential land in the late 1800s and as part of the Union Station bus/rail station between 1933 and 1973. As stated previously, the existing motel structure was constructed in 1975 and continues to operate on the Project Site. The Phase I ESA also does not identify the presence of any recognized environmental conditions (RECs) (i.e., the presence or likely presence of hazardous substances in, on, or at the property); a controlled REC (i.e., a release of hazardous substances or petroleum products); or a historical REC (i.e., a past release of any hazardous substances or petroleum products). The Phase I ESA identifies two “other environmental concerns,” which warrant discussion, but are not considered RECs. These environmental concerns are asbestos-containing materials (ACM) and lead-based paint.</p> <p>Regarding ACMs, given the age of the existing improvements on the Project Site, there is a potential that ACMs are present. The Phase I ESA documents that the observed suspected ACMs on the Project Site were in good condition at the time of the site reconnaissance (2021) and are not expected to pose a health and safety concern to the occupants. Based on the potential presence of ACMs, the Phase I ESA recommends the implementation of an operations and maintenance plan, which would stipulate that the repair and maintenance of ACMs disturbed as part of the rehabilitation activities be performed to protect the health and safety of the building occupants. Further, because building renovation activities are proposed, a thorough asbestos survey to identify asbestos-containing building materials is required in accordance with the USEPA National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 61 prior to renovation activities that may disturb suspected ACMs. While ACMs may be disturbed during the proposed rehabilitation of motel structure, construction contractors would be required to comply with local and state laws regulating the removal, handling, and disposal of ACMs in addition to USEPA’s NESHAP regulations, including 40 Cal-OSHA Rule 1529, and SMAQMD Rule 902. Further, these regulations have permit and noticing requirements, including SMAQMD’s requirement of written notification at least 10 days prior to work on friable or non-friable ACM, and Cal-OSHA’s requirement of notification at least 24 hours prior to work on ACMs. Further, ACM abatement contractors must maintain current licenses for the removal, transporting, or disposal of ACMs and must obtain all</p>
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		<p>building and special permits required for the asbestos removal work. Compliance with these mandatory regulations would ensure that Project occupants would not be exposed to hazards related to ACMs.</p> <p>Regarding lead-based paint, due to the age of the buildings on the Project Site, there is potential for lead-based paint to be present. The Phase I ESA states that all painted surfaces were in good condition upon site inspection and are not expected to pose a health and safety concern to building occupants. Construction activities that disturb materials or paints containing any amount of lead may be subject to certain state and federal regulations, such as 24 CFR Part 35, Cal-OSHA Rule 1532.1, and 40 CFR Part 745 regarding evaluation, testing, and reducing lead-based paint hazards. Compliance with these required regulations would reduce lead-based paint hazards for future residents.</p> <p>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. Further, because addressing ACM and lead-based paint hazards on the Project Site would be required pursuant to federal, state, and local laws, as identified above, there are no formal compliance steps or mitigation required and no further analysis is required.</p> <p><b>References:</b></p> <p>AEI Consultants, Incorporated, <i>Phase I Environmental Site Assessment</i>, 1100 H Street, Sacramento, October 1, 2021.</p> <p>California Department of Toxic Substances Control, EnviroStor Database, accessed October 8, 2021.</p> <p>California Department of Toxic Substances Control, 2013, <i>Sacramento Railyards – Fact Sheet: Proposed Cleanup Plan Available for Public Comment</i>.</p> <p>State Water Resources Control Board, GeoTracker Database, accessed October 8, 2021.</p>
<p><b>Endangered Species</b></p> <p>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>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.”</p> <p>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.</p>



		<p>The USFWS identifies the giant garter snake (threatened) (<i>Thamnophis gigas</i>), California red-legged frog (threatened) (<i>Rana draytonii</i>), California tiger salamander (threatened) (<i>Ambystoma californiense</i>), Delta smelt (threatened) (<i>Hypomesus transpacificus</i>), monarch butterfly (candidate) (<i>Danaus plexippus</i>), valley elderberry longhorn beetle (threatened) (<i>Desmocerus californicus dimporhpus</i>), vernal pool fairy shrimp (threatened) (<i>Branchinecta lynchi</i>), and vernal pool tadpole shrimp (endangered) (<i>Lepidurus packardi</i>) as endangered, threatened, or candidate species that could be found in the vicinity of the Project Site (see included Information for Planning and Consultation [IPaC] report, generated October 11, 2021).</p> <p>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. The monarch butterfly is currently only a candidate species and not currently protected under federal law. Further, no critical habitat has been identified for the monarch butterfly at this time.</p> <p>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 within an urbanized area that has been previously disturbed and predominantly covered by impervious surfaces and is surrounded by existing office and commercial buildings. Because the Project Site is located within a fully developed environment that is surrounded by disturbed areas, implementation of the Proposed Project would not result in the loss of habitat utilized by any of the endangered, threatened, or candidate species identified above. However, the Project Site does contain limited areas of managed landscaping and trees, which may provide shelter for migratory birds protected under the Migratory Birds Treat Act. Discussion of the Proposed Project's impact on migratory birds and related habitat is provided in the Natural Features section, below.</p> <p>Given the lack of natural habitat on the Project Site, the Project would have no effect on endangered, threatened, or candidate species or critical habitat. Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary.</p> <p><b>References:</b></p> <p>US Fish and Wildlife Service, <i>Information for Planning and Conservation (IPaC) Report</i>, generated October 11, 2021.</p>
<b>Explosive and Flammable Hazards</b>	<p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>There are inherent potential dangers associated with locating HUD-assisted projects near hazardous facilities which store, handle, or process hazardous substances of a flammable or explosive nature. According to HUD Guidance, if a project includes development,</p>

24 CFR Part 51 Subpart C		<p>construction, rehabilitation that will increase residential densities, or conversion, then the record must demonstrate that the project site is not located near hazardous facilities or must implement mitigation measures.</p> <p>The Project Site is currently developed with a motel and restaurant as well as limited surface parking, consisting of a total of 1.1 acres. As stated above, the Project would not increase residential densities and would not represent a substantial functional change in land use when compared with existing conditions apart from removal of the restaurant use from operation. That said, the Project would include conversion of the existing motel property and restaurant buildings into affordable housing and related services. Therefore, an analysis of current or planned stationary aboveground storage containers within 1 mile of the Project Site is provided below.</p> <p>The USEPA identifies approximately 35 locations within one-half mile that are in the RCRA (USEPA's Resource Conservation and Recovery Act) system, which is an inventory of all generators, transporters, treaters, storers, and disposers of hazardous materials and waste. These locations include multiple state buildings, automotive repair shops, and varied commercial and industrial buildings. Upon review of aerial photography of the facilities, aboveground storage tanks of more than 100-gallon capacity do not appear on these sites.</p> <p>Additionally, per the National Pipeline Mapping System maintained by the US Department of Transportation, the nearest gas transmission pipeline is located approximately 1,600 feet west of the Project Site, within the railroad right-of-way. There are no hazardous liquid pipelines, liquid spill accidents, or gas release incidences within the Project vicinity. In short, the Project Site and the immediate surrounding area are free of hazardous materials, contamination, toxic chemicals, gases, and radioactive substances that could affect health or safety, or conflict with the intended use of the Project Site. Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary.</p> <p><b>References:</b></p> <p>Google Earth, Map data 2020.</p> <p>US Department of Transportation, Pipeline and Hazardous Materials Safety Administration, National Pipeline Mapping System, map generated October 11, 2021.</p> <p>US Environmental Protection Agency, NEPA Assist Map of RCRA sites near Project Site, map generated October 11, 2021.</p>
<b>Farmlands Protection</b>	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	Federal projects are subject to Farmland Protection Policy Act requirements if they may irreversibly convert farmland to a nonagricultural use. The Proposed Project would involve the

<p>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>		<p>conversion of an existing motel and associated restaurant to an affordable housing use. The Project Site has been classified by the California Department of Conservation as Urban and Built-Up Land. The nearest land classified by the California Department of Conservation as Prime Farmland is located 3.25 miles northwest of the Project Site. Further, the Project would not result in physical impacts beyond the boundaries of the Project Site, and would not impact any prime farmland, unique farmland, or farmland of local importance. Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary.</p> <p><b>References:</b></p> <p>California Department of Conservation, California Important Farmland Finder, map generated on October 11, 2021.</p> <p>HUD, HUD Exchange: Farmland Protection, <a href="https://www.hudexchange.info/programs/environmental-review/farmlands-protection/">https://www.hudexchange.info/programs/environmental-review/farmlands-protection/</a>, accessed October 11, 2021.</p>
<p><b>Floodplain Management</b></p> <p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>Per HUD guidance, the Project is not exempt from compliance with HUD Floodplain Management regulations in Part 55 (through 24 CFR 55.12[c]). As stated above, the Project Site is not located within a Special Flood Hazard Area, but is rather located within Zone X, “area with reduced flood risk due to levee.” Further, HUD regulations at 24 CFR 55.20 require compliance with the HUD 8-Step Process for development within a floodplain if a project is deemed a critical action as defined in 24 CFR 55.2(b)(3). Critical actions are those activities for which even a slight chance of flooding would be too great, because flooding may result in loss of life, injury, or damage to property. A Project would be considered a “critical action” if it would create, maintain, or extend the useful life of structures or facilities that produce, use, or store hazardous materials; provide essential and irreplaceable records or emergency services; or would likely contain occupants with limited mobility (i.e., hospitals, nursing homes, or retirement service facilities). As the Project is not considered a “critical action” under this definition, and because existing levees reduce flood risks in the Project Area to minimal levels, there are no formal compliance steps or mitigation required and no further analysis is necessary.</p> <p><b>References:</b></p> <p>Federal Emergency Management Agency, Flood Insurance Rate Map 06067C0180J.</p>
<p><b>Historic Preservation</b></p> <p>National Historic Preservation Act of 1966, particularly sections 106 and</p>	<p>Yes    No</p> <p><input checked="" type="checkbox"/>    <input type="checkbox"/></p>	<p>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</p>

<p>110; 36 CFR Part 800</p>		<p>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).</p> <p><i>Background Research</i></p> <p>On October 8, 2021, Michael Baker staff conducted a records search at the North Central Information Center (NCIC) for the Project. The NCIC, as part of the California Historical Resources Information System, California State University, Sacramento, an affiliate of the California OHP, is the official state repository of cultural resources records and reports for Sacramento County. The records search included the area of potential effect (APE) and a quarter-mile radius search for archaeological resources. Due to the high amount of built environment resources (250+) within the search radius, the search radius for built environment resources was reduced to the indirect APE, which is roughly a city block in all directions. This was completed to reduce the effects/impacts analysis to only resources with the potential to be directly or indirectly affected by the Project.</p> <p>One historic property is mapped within the direct APE. This resource is the Raised Streets and Hollow Sidewalks (RSHS) District. This resource, also known as Sacramento's Buried Cultural Landscape, is a historic vernacular landscape district resulting from citizens who chose to raise the city streets in the 1860s and 1870s to mitigate flooding. In 2011, the RSHS District was found eligible under National Register of Historic Places (NRHP) Criteria A, C, and D. Under Criterion A, it was found eligible within the context of social history, commerce, politics/government, community planning and development, and engineering. Under Criterion C, it was found significant for its association with the method of construction by which Sacramento and other cities were raised in the 1850s to the 1870s. Finally, under Criterion D, the RSHS District was found to have a potential to yield information about nineteenth century vernacular design and construction of retaining walls and bulkheads. The period of significance is 1864 to 1878, the years of construction. The RSHS District's boundaries are Front Street to the west, 12<sup>th</sup> Street to the east, the southern sidewalk edge on H Street to the north, and the southern sidewalk edge on L Street to the south. The original street grade was buried beneath roughly 10 feet of fill and covered with various nineteenth century paving materials. The character-defining features of the aboveground elements are dipping alleyways, starred manhole covers, granite curbs, and cast-iron and quartz skylights. The character-defining features of the belowground resource are the extant hollow sidewalk segments with street-retaining walls, building walls, corbelled buttresses, timber and concrete supports, elevator access, original storefronts, end walls,</p>
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		<p>water tanks, and brick-barrel and lintel vaults. Many of the hollow sidewalks and raised areas below the streets and buildings were filled in, demolished, or otherwise altered, including the construction of Interstate 5 during the 1970s, Westfield Downtown Plaza in 1998, and extensive repaving over time in the areas north of L Street.</p> <p>The APE is located at the northeast edge of the RSHS District. The RSHS District is listed in the Sacramento County Built Environment Resource Directory with a status code of 3S and 3D (Appears Eligible for Listing in the NRHP). The RSHS District is not listed in the NRHP or the Sacramento Register.</p> <p>Five historical resources are located within the indirect APE, and ten additional cultural resources were identified within a quarter mile of the APE. The five historical resources located within the indirect APE are the Julius Wetzlar House (1021 H Street), listed in the NRHP; Jim Denny's commercial building (816 12<sup>th</sup> Street), designated locally; The Daily Recorder building (1115 H Street), eligible for local listing; 719 11<sup>th</sup> Street single-family residence, designated locally; and the 1210 H Street single-family residence, designated locally.</p> <p>No cultural resources studies have previously been completed within the direct APE. Fifty-three cultural resources studies have previously been completed within the indirect APE and a quarter-mile search radius.</p> <p><i>Pedestrian Survey</i></p> <p>An archaeological pedestrian survey was not undertaken for the Proposed Project because there are no exposed soils within the APE. The APE was surveyed on October 22, 2021, to identify any aboveground character-defining features of the RSHS District within the APE. No features of the district were identified. Buildings within the APE are not 50 years of age or over and were not included in the survey. The APE does not contain any surface archaeological or built environment resources that would require evaluation to the NRHP.</p> <p><i>Effects Analysis</i></p> <p>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.</p> <p>The RSHS District, an NRHP-eligible historic district, consists of a cultural landscape with various aboveground character-defining features, including streets raised roughly 10 feet above their original grade, dipping alleyways, starred manhole covers, granite curbs, cast-iron and quartz skylights; belowground features include hollow sidewalk segments, retaining walls, building walls, corbelled buttresses, timber and concrete supports, elevator access, original storefronts, end walls, water tanks, and brick-barrel and lintel vaults. No character-defining features were identified within the direct APE because the roadways, sidewalks, and aboveground character-</p>
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		<p>defining features are outside of the direct APE. The Project proposes to remove the current parking lot and construct a park, a small, covered seating area, and perimeter fencing. These changes require grading of up to 18 inches in depth. As the APE does not encroach on the sidewalks or roadways, the Project would not directly or indirectly affect character-defining features of the RSHS District. As such, a finding of no effect is appropriate for the RSHS District because the historic property will remain in place, as is, with no physical destruction or damage; alteration; removal from location; change of use, or change of any known 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, as defined in the Criteria of Adverse Effect at 36 CFR 800.5(a)(2)(i-vii).</p> <p>The Julius Wetzlar House (P-34-002391), built in 1871, is located within the indirect APE and is listed in the NRHP under Criterion B for its association with a significant individual in Sacramento's early history and Criterion C for its architectural significance. The Project will not directly or indirectly affect the reasons for which this property is listed in the NRHP. Further, the Project will have no effect on the Julius Wetzlar House because the historic property will remain in place, as is, with no physical destruction or damage; alteration; removal from location; change of use, or change of any known 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, as defined in the Criteria of Adverse Effect at 36 CFR 800.5(a)(2)(i-vii).</p> <p>The Project would not affect the other resources within the indirect APE that are not listed in the NRHP, including Jim Denny's, the Daily Recorder, and the single-family residences located at 719 11<sup>th</sup> Street and 1210 H Street because the Project would not demolish or materially alter these historical resources, and the physical characteristics that convey their historical significance would remain intact and unchanged.</p> <p>In short, the Project would have no effect and no impact on the resources identified above within the direct and indirect APEs.</p> <p><i>Archaeological Sensitivity</i></p> <p>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 direct APE displays similar aged soil at a similar geomorphic arrangement, in direct proximity to the American River.</p>
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		<p>Sediments at the surface of the Project area are less than 150 years old, or historical to modern in age. These soils thus have the potential to overlie buried archaeological deposits.</p> <p>Historic aerial imagery show that the Project Site included Victorian-era dwellings (late 1800s and early 1900s), as well as a boarding house in 1915 and a bus depot in the 1930s. While the direct APE went through several periods of demolition and construction, the levels of previous demolition and construction are not fully known. Therefore, the direct APE has a moderate to high potential for subsurface buried historic-period material associated with the lot use between the late nineteenth century and early to mid-twentieth century.</p> <p>Because the above-described buried archaeological sensitivity assessment determined moderate to high sensitivity for buried historic-period archaeological resources within the direct APE, <b>Mitigation Measures CUL-1</b> and <b>CUL-2</b> shall be implemented to mitigate adverse effects to historic properties. These mitigation measures, provided below, require sensitivity training for all personnel that would be involved with Project-related ground disturbance, as well as a requirement to retain a qualified archaeologist to monitor ground-disturbing activities.</p> <p><i>Native American Consultation</i></p> <p>On October 5, 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. Consultation invitations were sent via email on October 19 and 21, 2021, to federally recognized tribes identified in the HUD Tribal Directory Assessment Tool for Sacramento County and the NAHC contact list. To expedite consultation, Michael Baker International utilized an NAHC contact list provided to SHRA by NAHC in June 2021 for Sacramento County. The Native American tribes contacted as part of the consultation process include the Buena Vista Rancheria of Me-Wuk Indians of California; United Auburn Indian Community of the Auburn Rancheria of California; Tule River Indian Tribe of the Tule River Reservation; Ione Band of Miwok Indians; Shingle Springs Band of Miwok Indians; Wilton Rancheria; Colfax-Todds Valley Consolidated Tribe; and Tsi Akim Maidu. The United Auburn Indian Community (UAIC) responded to SHRA via e-mail on November 9, 2021 with a request to consult on the Project. The consultation meeting between SHRA and UAIC took place on November 23, 2021, during which UAIC requested specific mitigation measures related to monitoring and training be implemented for the Project. UAIC also communicated that a known burial site is located within a block of the Project Site. These mitigation measures are provided as <b>Mitigation Measure CUL-1</b> through <b>Mitigation Measure CUL-4</b>, below.</p>
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		<p>may be encountered and the procedures to be followed if identified. A qualified archaeologist must be supervised by a Secretary of the Interior (SOI) qualified archaeologist.</p> <p><b>CUL-2 Archaeological Monitoring Program:</b> The Project developer/applicant shall retain a qualified archaeologist to prepare an Archaeological Monitoring Plan (AMP) prior to ground-disturbing activities. The AMP must describe the procedures for the appropriate identification and treatment of archaeological resources (including Tribal resources) if any are discovered during grading or construction activities. The plan shall include provisions to halt work in the immediate area in the event of a discovery to allow for resource evaluation. The plan shall also identify the need for archaeological monitoring and provide detailed guidance outlining when and for what activities monitors must be present. The qualified archaeologist shall also prepare a report of findings after construction is completed, and shall transmit this report to SHRA.</p> <p><b>CUL-3 Tribal Monitoring:</b> The Project developer/applicant shall contact consulting tribes at least 2 weeks prior to Project ground-disturbing activities to retain the services of a paid/contracted Tribal Monitor(s). The duration of the monitoring and construction schedule shall be determined at this time. Field monitoring activities shall be documented on a Tribal Monitor log. The total time commitment of the Tribal Monitor will vary depending on the intensity and location of construction and the sensitivity of the area, including the number of finds. A contracted Tribal Monitor(s) from traditionally and culturally affiliated Native American Tribes shall monitor the grading, or other Project-related ground-disturbing activities. Tribal Representatives and Tribal Monitors act as a representative of their Tribal government and have the authority to identify sites or objects of cultural value to Native American Tribes and recommend appropriate treatment of such sites or objects. Tribal Monitors or Representatives have the authority to request that work be temporarily paused, diverted, or slowed within 100 feet of the direct impact area if sites or objects of significance are identified. Only a Tribal Monitor or Representative from a culturally and geographically affiliated tribe can recommend appropriate treatment and final disposition of cultural, or archaeological Tribal resources.</p> <p><b>CUL-4 Post Review Discoveries:</b> If potentially significant Tribal cultural resources or archaeological resources are discovered during Project-related ground disturbing construction activities, all work shall cease within 100 feet of the find. The Tribal Monitor discussed in <b>Mitigation Measure CUL-3</b>, or a Native American Representative from traditionally and culturally affiliated Native American Tribes shall be contacted immediately to assess the significance and cultural value of the find and make recommendations for further evaluation and treatment, as necessary. A qualified cultural resources specialist meeting the Secretary of Interior's Standards and Qualifications for Archaeology, may also assess the significance of the find in joint consultation with Native American Representatives to ensure that Tribal values are considered. Work shall remain suspended or slowed</p>
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		<p>within 100 feet of the find until the resource is evaluated, which shall occur within one day, but no more than two days, of the find.</p> <p>The Project developer/applicant shall coordinate with a UAIC Tribal Representative any necessary investigation and evaluation of the discovery under the requirements of Section 106 of the National Historic Preservation Act. Preservation in place is the preferred alternative and every effort must be made to preserve the resources in place, including through project redesign. The contractor shall implement any measures deemed by the lead agency to be necessary and feasible to preserve in place, avoid, or minimize significant effects to the resources, including the use of a paid Native American Monitor whenever work is occurring within 100 feet of the find.</p> <p>If adverse impacts to a cultural resource or unique archeological resources occurs, then consultation with UAIC and other traditionally and culturally affiliated Native American Tribes regarding adverse effects shall occur, pursuant to 36 Code of Federal Regulations §800.5, Assessing Adverse Effects, and §800.6, Resolution of Adverse Effects.</p> <p><b>CUL-5 Native American Consultation:</b> The SHRA shall continue consultation with any Native American tribes that may request consultation. Through this consultation process, if deemed necessary by consulting Native American tribes and the SHRA, the SHRA shall develop a testing, treatment, and monitoring plan in collaboration with the consulting tribes pursuant to 36 CFR 800.6 (Resolution of adverse effects) and 800.13 (Post-review discoveries).</p> <p><b>References:</b></p> <p>Michael Baker International, Inc., Confidential: Historic Property Identification Memorandum for the Sutter House Motel Conversion Project, October 29, 2021.</p> <p>Polanco, Julianne, State Historic Preservation Officer, Letter to Stephanie Green, SHRA, December 6, 2021.</p>
<p><b>Noise Abatement and Control</b></p> <p>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>To demonstrate consistency with HUD guidance on noise abatement and control, HUD requires that for projects involving new construction or rehabilitation of an existing residential property, the Environmental Review Record contain one of the following:</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• If within those distances, documentation showing the noise level is acceptable (at or below 65 L<sub>dn</sub> [day/night noise level]);</li> <li>• If within those distances, documentation showing that there is an effective noise barrier (i.e., that provides sufficient protection); or</li> </ul>

		<ul style="list-style-type: none"> <li>Documentation showing the noise generated by the noise source(s) is normally unacceptable (66–75 <math>L_{dn}</math>) and identifying noise attenuation requirements that will bring the interior noise level to 45 <math>L_{dn}</math> and/or exterior noise level to 65 <math>L_{dn}</math>.</li> </ul> <p>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 City of Sacramento City Code (SCC) contain the City’s policies on noise. The SCC and the Noise Element establish guidelines for controlling construction and operational noise in the City. For operational noise standards, the City identifies noise-sensitive land uses and noise sources with the intent of separating these uses.</p> <p>The Project Site is located within a fully urbanized area, characterized by dense urban development, mass transit, and vehicle traffic. The primary sources of noise in such urban areas include mechanical equipment, transportation, and parking areas.</p> <p>As stated above, McClellan Airfield is located approximately 6.5 miles (approximately 34,320 feet) northeast of the Project Site. The nearest railroad is the light rail corridor located within 12<sup>th</sup> Street, immediately east of the Project Site. The nearest major roadway is J Street, which includes four travel lanes heading east and is located approximately 630 feet south of the Project Site. Since the Project Site is within the distance screening criteria set by HUD for roadways, railroads, and airports, the record must, therefore, identify whether the Project Site’s noise level is acceptable (at or below 65 <math>L_{dn}</math>) and if not, the record must state whether noise attenuation features would be included as part of the proposed rehabilitation activities.</p> <p>The City of Sacramento General Plan Noise Element, Appendix C, establishes noise contours for the City of Sacramento. The closest identified measurement is located on I Street, between 5<sup>th</sup> Street and 12<sup>th</sup> Street, located approximately 210 feet south of the Project Site. This measured area also lies between the major roadway identified above (J Street) and the Project Site, meaning that noise generated by J Street would be measured at a lower level at the Project Site as compared with this measurement point in I Street. The 2035 General Plan identified the existing Community Noise Equivalent Level (CNEL) at this location as 62.9 dBA with a future projected CNEL in 2035 of 63.8 dBA. The CNEL is similar to the <math>L_{dn}</math>, but also adds a penalty of 5 dB for the evening hours of 7:00 pm to 10:00 pm and a penalty of 10dB for the nighttime hours of 10:00 pm to 7:00 am. This results in the CNEL being a more conservative measurement than <math>L_{dn}</math>.</p> <p>Additionally, the light rail corridor located within 12<sup>th</sup> Street, immediately east of the Project Site, would generate noise from passing light rail trains; however, these light rail trains are electrically powered and are common in urban environments, generating less noise than a commuter or freight train (noise generation is typically similar to noise generated by a bus).</p>
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		<p>Further, HUD guidance “strongly encourages” noise abatement for “major rehabilitation” projects located within normally unacceptable noise zones (i.e., day-night average sound levels above 65 dB but not exceeding 75dB). While ambient noise levels at the Project Site are close to this 65dB threshold, the Project would involve installation of new PTAC units within each residential unit, as well as inspection, sealing, and painting of the exterior of the structure. These Project activities would effectively reduce noise impacts on residents by removing outdated central heating and air conditioning and providing residents efficient air conditioning/ventilation without the need to open windows. Also, sealing and repainting the exterior would make the structure more insulated from exterior noise.</p> <p>Therefore, because the Project Site is within HUD’s Acceptable Noise Zone (not exceeding 65 dB) and because the Project would provide noise attenuation features through the rehabilitation process, there are no formal compliance steps or mitigation required and no further analysis is necessary.</p> <p><b>References:</b></p> <p>HUD, Noise Abatement and Control, <a href="https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/">https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control/</a>, accessed October 12, 2021.</p> <p>Sacramento, City of, 2015, General Plan 2035, Noise Element, Appendix C – Noise Contours.</p>
<p><b>Sole Source Aquifers</b></p> <p>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>The Project would involve conversion of an existing motel and associated restaurant to an affordable housing use in the City of Sacramento. The Proposed Project is not located within a sole source aquifer area, as shown on the USEPA’s online mapping portal (the nearest sole source aquifer is approximately 103 miles southwest of the Project Site). Project-related improvements to the Project Site would not result in impacts to this sole source aquifer given the distance between the aquifer and the Project Site. Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary.</p> <p><b>References:</b></p> <p>US Environmental Protection Agency, Map of Sole Source Aquifers in California, generated October 29, 2021.</p>
<p><b>Wetlands Protection</b></p> <p>Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>The Proposed Project would involve the conversion of existing structures that were constructed prior to the effective date, 1977, of Executive Order 11990. The Proposed Project would not 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]”). However, the Project would involve minimal ground disturbance in the northwestern</p>

		<p>portion of the Project Site associated with removal of the existing parking lot and construction of outdoor amenities.</p> <p>As determined using the USFWS's National Wetlands Inventory, there are no known wetlands within or adjacent to the Project Site. As described above, the Project Site is a flat, 1.1-acre rectangular parcel that is fully developed. There are no drainages or hydrologic features on the Project Site, nor are there depressions or topographical features indicative of potential wetland areas. The National Wetlands Inventory identifies the Sacramento River, approximately 0.8 miles west of the Project Site, as the closest wetland (riverine) feature. This riverine feature has freshwater forested/shrub wetland features along the western bank at the nearest point to the Project Site. 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.</p> <p>Grading and construction activities associated with the Proposed Project would be required to comply with state stormwater runoff and sedimentation prevention requirements. 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 0.8 miles away from the Project Site, no wetlands would be impacted in terms of Executive Order 11990's definition of new construction.</p> <p>Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary.</p> <p><b>References:</b></p> <p>HUD, Wetlands Protection, <a href="https://www.hudexchange.info/programs/environmental-review/wetlands-protection/">https://www.hudexchange.info/programs/environmental-review/wetlands-protection/</a>, accessed October 12, 2021.</p> <p>US Fish and Wildlife Service, National Wetlands Inventory. Wetlands near Project Site, generated October 12, 2021.</p>
<p><b>Wild and Scenic Rivers</b></p> <p>Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>The Project Site is located approximately 1.2 miles southwest at the closest point to the American River, which is identified as part of the National Wild and Scenic Rivers System, operated by the USFWS. Specifically, the USFWS 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.</p> <p>The Project Site would not adversely affect the wild and scenic nature of the river given the distance between the Project Site and the river. The Project does not include any water control features that could affect the free-flowing condition of the American River, such as dams, water diversion structures, bridges, or roadways. Further, because direct impacts associated with the Project would be limited</p>



		<p>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.</p> <p>Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary.</p> <p><b>References:</b></p> <p>HUD, Wild and Scenic Rivers, <a href="https://www.hudexchange.info/programs/environmental-review/wild-and-scenic-rivers/">https://www.hudexchange.info/programs/environmental-review/wild-and-scenic-rivers/</a>, accessed October 12, 2021.</p> <p>US Fish and Wildlife Service, National Wild and Scenic Rivers System, American River (lower), California, <a href="https://rivers.gov/rivers/american-lower.php">https://rivers.gov/rivers/american-lower.php</a>, October 12, 2021.</p>
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### ENVIRONMENTAL JUSTICE

<b>Environmental Justice</b>	<p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>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.</p>
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

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>LAND DEVELOPMENT</b>		

<p>Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design</p>	<p>(2) No impact anticipated</p>	<p><b>Conformance with Plans</b></p> <p>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).</p> <p>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 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).</p> <p>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.</p> <p>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 to ensure that cumulative development does 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.</p> <p>The Project would result in an increase of 93 residential units, 92 of which would be studio units for low-income households. 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 187 persons to the population of</p>
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		<p>Sacramento;<sup>5</sup> 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 187 persons to the City of Sacramento would represent approximately 0.2 percent of the 2035 General Plan’s planned population growth between 2025 and 2035.<sup>6</sup> Further, 92 units of new residential housing would add 92 housing units to the SACOG region, or approximately 0.1 percent of the number of housing units anticipated to be developed in the SACOG region between 2016 and 2040.<sup>7</sup> Additionally, the proposed 92 affordable housing units would account for approximately 0.5 percent of the City of Sacramento’s low-income housing unit RHNA allocation.<sup>8</sup></p> <p>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.</p> <p>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:</p> <p><b>Land Use and Urban Design Element</b></p> <ul style="list-style-type: none"> <li>• 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.</li> </ul> <p><b>Housing Element</b></p> <ul style="list-style-type: none"> <li>• Goal H-3.1: Provide a variety of housing options for extremely low-income households.</li> </ul> <p><b>Compatible with Land Use and Zoning</b></p> <p>According to the SCC, both parcels that make up the Project Site are classified as zone C-2-SPD, meaning the Project Site has an underlying zoning designation of C-2 (General Commercial), and is located within the</p>
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<sup>5</sup> 92 studio units \* 2 persons per unit = 184. 2.7 persons per household \* one-market rate manager’s unit = 2.7. The total would be 184 + 2.7 = 186.7 or 187 persons.

<sup>6</sup> 2035 estimated population of 640,381 – 2025 estimated population of 560,278 = 80,103. 187 persons/80,103 anticipated growth = 0.002 or 0.2 percent.

<sup>7</sup> 2040 estimated housing units in Sacramento of 267,970 – 2016 housing units in Sacramento of 194,470 = 73,500. 93 units /73,500 anticipated number of new housing units between 2016 and 2040 = 0.001 or 0.1 percent.

<sup>8</sup> 92 proposed affordable studio units / Sacramento RHNA affordable housing allocation of 16,769 = 0.005 or 0.5 percent.

		<p>Central City Special Planning District (SPD). Multifamily buildings are permitted within the C-2-SPD zone, provided the project adheres to Section 17.228.117 of the SCC. Section 17.228.117 states that projects with greater than 15 dwelling units must maintain an on-site property manager, and that the owner shall establish a regular program of routine maintenance for the building and grounds/landscaping. Building height is limited to a maximum of 85 feet. The Project, with an on-site manager and a building height of approximately 38 feet, would meet these requirements. The General Plan designation of the Project Site is Urban Corridor High, which permits buildings between 3 and 8 stories high, a minimum density of 33 dwelling units per acre and a maximum density of 155 dwelling units per acre. The Project, which would have a density of 84 units per acre (93 units / 1.1 acres) and would remain three stories, would fall within this allowable density range.</p> <p>The Proposed Project would involve rehabilitation of an existing motel structure and would not involve any new construction of residential units that would require approval by Sacramento City Council. As such, City approvals are limited to staff-level Site Plan and Design Review.</p> <p><b>Scale and Urban Design</b></p> <p>As previously stated, the Project would result in minor exterior alterations to an already developed Project Site. Specifically, the exterior of the motel structure would be painted, but no other improvements are proposed for the motel or the restaurant buildings that would substantially modify the exterior of the structures. Exterior alterations to the Project Site include outdoor amenities constructed on the northwest portion of the Project Site, as shown in <b>Figure 4</b>, which includes a dog park, gaming area, and a seating area that are surrounded by fencing along the Project Site boundary.</p> <p>Therefore, the Project would not alter the Project Site's appearance in a way that would result in an intrusion of design elements that are out of character or scale with the existing physical environment. As the Project Site is located within a dense urban area with a mix of low-rise and high-rise structures of varying uses, as well as plazas and parks, a medium-rise structure with outdoor recreational amenities would not be out of character for the community in which the Project Site is located. Therefore, because the Project would not result in construction of a structure that would create a change in the size, scale, placement, or height in relation to neighboring structures, the Project would not have an impact relating to scale and urban design.</p> <p><b>References</b></p> <p>City of Sacramento, 2035 General Plan Land Use and Urban Form Diagram, February 22, 2017.</p> <p>City of Sacramento, General Plan, Land Use and Urban Design Element, March 3, 2015.</p> <p>City of Sacramento, General Plan, 2021-2029 Housing Element, 2021.</p>
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<p>Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff</p>	<p>(2) No impact anticipated</p>	<p><b>Soil Suitability</b></p> <p>According to HUD Guidance, soil suitability is the physical capacity of a soil to support a particular land use. To be suitable for a building, for example, the soil must be capable of adequately supporting its foundation without settling or cracking.</p> <p>As previously stated, the Project would involve rehabilitation of an existing motel structure and an existing restaurant structure. New construction associated with the Project would be limited to the construction of outdoor amenities. The Project would not result in construction of new residential structures that would require an analysis of soil suitability.</p> <p>There is no evidence of subsidence or structural failure of the existing structures. Therefore, because the Project would not involve new construction of permanent residential structures, there would be no impact relating to soil suitability.</p> <p><b>Slope</b></p> <p>The Project Site is entirely covered in impervious surfaces or managed landscaping and does not contain any naturally occurring landforms or steep slopes. The Project would not involve alteration of hillsides or steep vegetated slopes and would, therefore, not substantially change the visual character of the site or alter any native plant communities. No further compliance steps are required.</p> <p><b>Erosion, Drainage, and Stormwater Runoff</b></p> <p>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 limited ground disturbance, the Project would be required to include appropriate sediment and pollution control measures during construction, such as those required by the City of Sacramento's Grading, Erosion, and Sediment Control Ordinance (Section 15.88 of the SCC, Ordinance No. 93-068). Construction activities would be required to include measures designed to control surface runoff and erosion, such as retaining sediment on-site, and preventing site runoff during the construction period.</p> <p>Following construction of the outdoor amenities, the Project Site would remain entirely covered by impervious surfaces and managed landscaping. As such, the Project Site would not include any areas of unmanaged vegetation or uncovered/exposed soils that could result in soil erosion following a rain event. Therefore, because the Project would primarily involve interior renovations of existing structures, and because</p>

		<p>ground disturbance of outdoor areas would be limited in scale and scope, the Project would not result in impacts related to erosion, drainage, or stormwater runoff.</p> <p><b>References:</b></p> <p>City of Sacramento, Administrative and Technical Procedures Manual for Grading and Erosion and Sediment Control, October 2013.</p>
Hazards and Nuisances including Site Safety and Noise	(2) No impact anticipated	<p><b>Hazards and Site Safety</b></p> <p>The Project Site is located in an urbanized area and is not exposed to potential 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.</p> <p>Pursuant to Policy PHS 3.1.1 in the Sacramento 2035 General Plan, which states that the “City shall ensure buildings 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 AEI Consultants, on October 1, 2021.</p> <p>This study is discussed in the Contamination and Toxic Substances section, above. In short, the Phase I ESA did not find any RECs on the Project Site; however, the Phase I ESA states that ACM and lead-based paint may pose a risk to inhabitants if disturbed. Compliance with mandatory federal, state, and local regulations regarding the handling and disposing of ACM and lead-based paint would reduce the risks to future inhabitants posed by these materials.</p> <p><b>Seismic Hazards</b></p> <p>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 nearest fault traces mapped by the California Department of Conservation as an Earthquake Zone of Required Investigation, pursuant to the Alquist-Priolo Act, is the Hunting Creek Fault located near the Knoxville Wildlife Area north of Lake Berryessa, approximately 40 miles west of the Project Site. Therefore, the Project Site is not situated within a mapped earthquake fault zone, nor do any mapped faults cross the site.</p>



Like all of California, the Project Site is located within a seismically active area; however, building codes in California are, and have historically been, focused on prioritizing protection of life and property from seismic-related impacts. As such, the Project would not be at a greater risk than other residential land uses of this kind.

#### **Nuisances**

There is no evidence that the Project Site would be affected by gas, smoke, or fumes; odors; vibration; glare from adjacent 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 similar to existing conditions (i.e., a motel and restaurant land use) and would be typical of other multifamily 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 or large trucks. The following paragraphs outline the noise impacts of Project construction and operation.

#### *Construction*

Construction of the proposed outdoor amenities within the parking area would involve demolition of the asphalt surfaces in the parking area, and grading to a maximum depth of 18 inches. While such activities would be limited in scope and duration, these construction activities would generate construction-related noise. The Project would be occurring within a fully urbanized area, characterized by dense development, light rail transit, and vehicle traffic, all of which contribute to elevated ambient noise in the Project area. Further, the Project would adhere to the City's noise ordinance, which governs hours of construction, noise levels generated by construction and mechanical equipment, and the allowed level of ambient noise (SCC 8.68.080[D]). In accordance with these regulations, construction noise would be limited to normal working hours (7:00 a.m. to 6:00 p.m. Monday through Saturday, and 9:00 a.m. to 6:00 p.m. on Sunday). The most intensive day of construction would likely occur during demolition of the existing parking area on the northwest portion of the Project Site and limited grading to accommodate the proposed outdoor amenities. With the limited scope and scale of Project grading and outdoor construction activities, and given the Project Site's location within a fully urbanized area, the most intensive day of Project construction would be well below any threshold of significance related to construction noise impacts.

#### *Operation*

The Project would generate on-site noise through Project operation from sources such as vehicles, mechanical equipment, and the proposed new

		<p>outdoor amenities. Vehicle noise and mechanical equipment noise would be the same or less than existing conditions as vehicle traffic is anticipated to decrease with removal of the restaurant use from the Project Site. The Project may generate on-site noise through the introduction of the proposed outdoor amenities on the northwest side of the Project Site. However, while outdoor gathering spaces have the potential to generate noise from large groups of people, the outdoor dog park, smoking area, and gaming area would be for use by Project residents and would not likely host large gatherings of people. As such, Project operation would not generate noise levels that would exceed the City's noise standards.</p> <p><b>References:</b></p> <p>AEI Consultants, Phase I Environmental Site Assessment, 1100 H Street, October 1, 2021.</p> <p>California Department of Conservation, Earthquake Zones of Required Investigation, map generated November 3, 2021.</p>
Energy Consumption	(2) No impact anticipated	<p><b>Energy Usage</b></p> <p>Because the Project Site is currently characterized by an existing motel and restaurant use, the Project would not represent a substantial change in the Project Site's energy demands. Rather, with removal of the restaurant use from the Project Site, it is likely that the Project would result in a decrease in energy usage. Further, proposed rehabilitation activities, such as removal of the existing central air conditioning system and installation of new individual air conditioning and heating units within each unit, would improve energy efficiency of the Project.</p> <p>Additionally, the Project Site is located within close proximity (less than one-half mile) to a wide range of retail and commercial services, as well as public transportation options (as discussed further below). Project Site proximity to these commercial and transportation resources, as well as the Project's proposed on-site bicycle storage area, would encourage residents to walk or use alternative modes of transportation, thus decreasing energy consumption in the form of vehicle fuels.</p> <p>Therefore, compliance with required local and state energy efficiency 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.</p> <p><b>Energy Utilities and GHG Emissions</b></p> <p>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 (as of 2021) include 39 percent renewable (biomass, geothermal, hydroelectric, solar, and wind), 29</p>

percent large hydroelectric, and 35 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 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.

Given the limited duration and scope of proposed construction of the outdoor amenities, temporary energy use during construction would not result in a significant increase in peak or base demands on regional energy supplies or require additional capacity from local or regional energy supplies, and it would not result in inefficient or unnecessary consumption of energy resources during Project construction. Because the proposed land use is functionally similar to the existing motel use, there would not be a substantial increase in greenhouse gas (GHG) emissions during Project operation. Specifically, the primary contributor of GHG emissions during operation of the Proposed Project would be internal combustion vehicles used by residents and guests of the Project and any internal combustion landscape maintenance equipment used to maintain common-space areas and decorative landscaping. Due to the California Air Resources Board's increasing vehicle efficiency standards, it is assumed that long-term transportation fuel consumption from Project operations would steadily decline over time. Therefore, GHG emissions associated with operation of the Project are not anticipated to be significant due to existing federal and state vehicle emissions regulations and the relatively small size of the Project in comparison to the region and state as a whole. Air quality impacts associated with energy consumption are discussed further in the Clean Air section of this Environmental Assessment.

		<p><b>References:</b></p> <p>California Energy Commission, California Energy Demand, 2014-2024 Revised Forecast, September 2013.</p> <p>California Public Utilities Commission, Renewables Portfolio Standard Program, <a href="https://www.cpuc.ca.gov/rps/">https://www.cpuc.ca.gov/rps/</a>, accessed October 27, 2021.</p> <p>Sacramento Municipal Utility District, 2020 Power Content Label, October 2021.</p>
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Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>SOCIOECONOMIC</b>		
Employment and Income Patterns	(2) No impact anticipated	<p>The Proposed Project would involve rehabilitation of an existing 94-room motel into 92 affordable housing units (studio units) and one market-rate manager's unit. Other Project activities include construction of outdoor amenities and retrofitting the second floor of the existing restaurant to provide social services for Project residents. A minor increase in construction-related employment opportunities would occur as a result of construction phases of the Project, which are anticipated to be filled by the existing regional workforce. Further, the Project would provide conference and meeting spaces for case workers and social workers to meet with Project inhabitants, which may increase employment opportunities for such social workers. However, the Project's influence on employment and income patterns is anticipated to be temporary and/or negligible.</p>
Demographic Character Changes, Displacement	(2) No impact anticipated	<p><b>Demographic Character Changes</b></p> <p>The Project would involve conversion of 94 motel rooms to 92 affordable housing units and one manager's unit. As such, no existing residential units would be removed as part of the Proposed Project and the Project would provide more housing opportunities for low-income households.</p> <p>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 recreation assets, government offices/buildings, commercial uses, and transit opportunities, which reduce physical barriers and population isolation.</p> <p>Because of the diversity of 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.</p> <p><b>Displacement</b></p>

		<p>The Project Site is currently occupied by existing motel and restaurant uses. As such, the Project would not result in the removal of any permanent housing units. Rather, the Project would result in the conversion of 94 motel rooms into 92 affordable studio units and one manager's unit. Therefore, the Project would not result in displacement of any residents.</p> <p>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.</p>
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Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>COMMUNITY FACILITIES AND SERVICES</b>		
Educational and Cultural Facilities	(2) No impact anticipated	<p>The Project Site is located within the Sacramento City Unified School District (SCUSD), which serves over 40,711 students on 75 campuses that span 70 square miles. However, because the residential units associated with the Project would be studio units, there would be few, if any, 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.</p> <p>Further, the Project would provide on-site amenities, such as a pool and pool deck, a gaming area, a dog park, an outdoor seating area, and community rooms in the restaurant building for social services provided to 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.</p> <p><b>References:</b></p> <p>Sacramento City Unified School District, Developer Fee Justification Report, March 2012.</p> <p>Sacramento City Unified School District, Our District, <a href="https://www.scusd.edu/our-district">https://www.scusd.edu/our-district</a>, accessed November 2, 2021.</p>
Commercial Facilities	(2) No impact anticipated	<p>The Project would consist of the conversion of an existing 94-room motel and an existing restaurant building into 92 units of affordable housing, one manager's unit, and community spaces for social services provided to Project residents (on the second floor of the restaurant). 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 restaurants along 12<sup>th</sup> Street, 15<sup>th</sup> Street, and K Street; a convenience store at the southeast corner of the intersection of 14<sup>th</sup> Street and G Street; a pharmacy and grocery store located south of the intersection of</p>

		<p>J Street and 9<sup>th</sup> Street; and other uses commonly found in dense downtown areas, such as banks, convenience stores, barber shops, nail salons, and entertainment venues (e.g., movie theaters).</p> <p>Further, the Sacramento Regional Transit's blue line light rail service runs along 12<sup>th</sup> Street immediately east of the Project Site, connecting north Sacramento, downtown, and south Sacramento. In addition to the multitude of available commercial facilities available to residents of downtown Sacramento, the 28 stations located along the blue line would provide Project residents with access to commercial facilities in other areas of the City. Therefore, existing commercial facilities serving the Project Site are adequate and accessible and no adverse Project-related impacts would occur.</p>
Health Care and Social Services	(2) No impact anticipated	<p>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 1.3 miles and 2.1 miles east of the Project Site, respectively. These hospitals are located in downtown Sacramento, which would be accessible via transit (Sacramento Regional Transit bus route 30, which runs west to east along J Street).</p> <p>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.</p> <p>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, and provides emergency services, an eye institute, home care services, and a preventative health center.</p> <p>First-response emergency services are provided by the Sacramento Fire Department (SFD), which operates out of the Public Safety Center, located at 5770 Freeport Boulevard, 4.1 miles south of the Project Site. The SFD operates multiple engine companies evenly dispersed throughout the City, each with four personnel (a company officer, engineer, and two firefighters). A total of 24 fire stations are strategically located throughout the City of Sacramento to provide assistance to area residents and businesses. Although each fire station operates within a specific response district encompassing the immediate geographical area around the station, all five fire agencies operating within Sacramento County (SFD, Sacramento Metro Fire District, Sacramento International Airport Fire, Cosumnes Fire District, and the Folsom Fire Department) share an automatic aid agreement, which means that the closest fire unit</p>



		<p>would respond to an emergency, regardless of jurisdiction. The Project Site is primarily served by SFD Station No. 2, located at 1229 I Street, approximately 400 feet southeast of the Project Site. SFD Station No. 2 provides an engine company and medic/rescue services. Given Station No. 2's close proximity to the Project Site and the services provided by this station, there would be adequate health care services, including emergency medical services, available to serve the Project.</p> <p>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 in the existing restaurant building. Therefore, adequate social services would be available to residents of the Project Site and no Project impacts are anticipated.</p> <p><b>References:</b></p> <p>City of Sacramento, 2035 General Plan Public Services Background Report, March 2015.</p> <p>Sacramento County, Health and Social Services Department, <a href="https://www.saccounty.net/live-visit/Pages/HealthSocialServices.aspx">https://www.saccounty.net/live-visit/Pages/HealthSocialServices.aspx</a>, accessed June 30, 2021.</p>
Solid Waste Disposal / Recycling	(2) No impact anticipated	<p>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.</p> <p>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.</p> <p>While the conversion of an existing motel and restaurant to new affordable housing would result in an increase in residential solid waste and recycling generation, the removal of the existing commercial uses on the Project Site (the motel and restaurant uses), both of which were</p>

		<p>generating commercial solid waste, would likely result in the Project having similar or less solid waste and recycling generation as compared with existing conditions. Further, given the existing capacity of the area landfill, any net change in solid waste generation could be accommodated by the existing landfill and recycling infrastructure.</p> <p>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.</p> <p><b>References:</b></p> <p>California Department of Resources Recycling and Recovery, Solid Waste Information System Facility/Site Activity Details: Sacramento County Landfill (Kiefer), accessed October 12, 2021.</p> <p>City of Sacramento, 2035 General Plan Utilities background report, March 2015.</p>
Waste Water / Sanitary Sewers	(2) No impact anticipated	<p>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 City's service area. Specifically, the Project Site is served by the City's combined sewer system, which serves an area approximately 7,500 acres in size in the older, central portion of the City by conveying wastewater through 276 miles of 4- to 120-inch diameter pipes. During typical operating conditions, wastewater conveyed through the City's combined sewer system is routed by the collection system pipes to the Sacramento Regional Wastewater Treatment Plant (SRWTP), which is located south of the City limits. The SRWTP is owned and operated by Regional San and manages the wastewater treatment needs for approximately 1.6 million people and treats over 150 million gallons of wastewater per day.</p> <p>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</p>

		<p>discharges from the SRWTP will be reduced by 99 percent and the SRWTP will produce more recycled water for use in irrigation.</p> <p>While the Proposed Project would result in 92 new affordable residential units plus one manager's unit, the Project would also involve removal of existing motel and restaurant uses on the Project Site (while keeping the structures in place). As such, wastewater generated by the Project would likely be the same or less than wastewater generated under existing conditions. Regardless, 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 treatment capacity of 51 mgd. When just considering the proposed 92 studio units and one manager's unit, without acknowledging the loss of wastewater generation resulting from removal of the existing uses on the Project Site, the Proposed Project 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.</p> <p>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.</p> <p><b>References:</b></p> <p>City of Sacramento, Department of Utilities, <i>Sewer System Management Plan 2018-2019</i>.</p> <p>Sacramento Regional County Sanitation District, <i>A Guide to the Sacramento Region's Sewer Services</i>, undated.</p> <p>Sacramento Regional County Sanitation District, <i>2020 State of the District Report</i>, 2020.</p>
Water Supply	(2) No impact anticipated	<p>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 2020 UWMP was adopted by the City in June 2021. According to the 2020 UWMP, the City provided water to 143,946 customer connections and supplied 100,483 acre-feet (AF) of water in 2020 to wholesale and retail customers. The majority 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 44 percent of overall demand. Multifamily residential</p>

		<p>land uses account for approximately 14 percent of overall demand. Total retail water demand is anticipated to increase from 108,432 AF in 2025 to 127,564 AF in 2040. This is primarily due to the increase in population of the City's water service area (a population of 510,931 in 2020 and an anticipated population of 695,830 in 2040).</p> <p>The 2020 UWMP projects that, under normal year supply and demand scenarios, supply would exceed demand in 2025, 2030, 2035, and 2040 by between 216,258 AF and 235,391 AF. Similar differences between supply and demand are shown in the UWMP when evaluating the single dry year and multiple dry year scenarios. This is because the City is allowed to divert the same amount of water from the American River and the Sacramento River so long as the total combined diversion from both rivers does not exceed the maximum combined diversion specified in an existing water rights settlement reached between the City and US Bureau of Reclamation. Therefore, based on current management practices, the City would have adequate water supplies to serve the Proposed Project.</p> <p><b>References:</b></p> <p>City of Sacramento, 2020 Urban Water Management Plan, Final Report, June 2021.</p>
Public Safety - Police, Fire and Emergency Medical	(2) No impact anticipated	<p><b>Police</b></p> <p>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 Central area command. The nearest Sacramento Police Department facility to the Project Site is the Richards station, located at 300 Richards Boulevard (approximately 1.1 miles northwest 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.</p> <p>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 187 persons to the population of Sacramento;<sup>9</sup> 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 187 persons to the City of Sacramento would represent approximately 0.2</p>

<sup>9</sup> 92 studio units \* 2 persons per unit = 184. 2.7 persons per household \* one-market rate manager's unit = 2.7. The total would be 186.7 or 187 persons.

percent of the 2035 General Plan's planned population growth between 2025 and 2035.

Further, the Project would not present any unique features or operational aspects that could reasonably be expected to result in an increased need for police facilities. Additionally, 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. Additionally, the police were already serving the hotel property and there are no design elements or inherent characteristics that would suggest that the police service demands of an affordable housing property would be greater than a hotel property. 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 SFD. As stated above, the Project Site is primarily served by Station No. 2, located at 1229 I Street, located approximately 400 feet southeast of the Project Site, which provides an engine company, medic and 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 result in an increase in population as compared with existing conditions, it would not be a significant increase, as described above. Additionally, the Project Site is currently served by fire protection services and would continue to operate in a similar way as existing conditions. Therefore, the Proposed Project would not adversely impact fire protection services in the City.

#### **Emergency Medical Services**

See the Health Care and Social Services discussion, above.

#### **References:**

California Department of Finance, Report E-5, City/County Population and Housing Estimates January 1, 2010-2021, January 2021.

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

		City of Sacramento, <i>Sacramento Police Department 2016 Annual Report</i> , 2016.
Parks, Open Space and Recreation	(2) No impact anticipated	<p>The Project Site is located approximately 700 feet east of the Cesar Chavez Plaza, approximately 1,000 feet south of the J. Neely Johnson Park, and 1,600 feet north of the California State Capitol Park. These three assets, located within one-half mile of the Project Site, provide outdoor recreation spaces, lawns, memorials, a rose garden, community gardens, and outdoor gathering spaces.</p> <p>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. Further, the Project would provide on-site recreation assets, such as the existing pool, as well as the proposed dog park, outdoor seating area, and gaming area, which would further offset the limited demand on area recreation assets that would be generated by the Project. Given the relatively small increase in population associated with the Project, the existing and proposed on-site recreation assets, and the Project's close proximity to existing recreation assets, the Project would not result in adverse impacts to the existing municipal park system.</p>
Transportation and Accessibility	(2) No impact anticipated	<p>The Project would result in minor short-term and long-term impacts to transportation and accessibility. For short-term impacts, Project construction would consist of site preparation and construction of the proposed outdoor amenities, as well as rehabilitation activities within the existing structures on the Project Site. 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-related traffic (i.e., trucks and worker vehicles) could temporarily affect traffic flow on the surrounding street network, the impacts would be temporary and would fluctuate in intensity throughout the construction day and vary throughout the overall construction 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.</p> <p>Project-related long-term traffic impacts include the impact of resident, visitor, and delivery/service vehicles. As of July 1, 2020, transportation impact assessments prepared in accordance with the California Environmental Quality Act are required 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)</p>



		<p>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 VMT impacts per OPR guidance. Additionally, it is not likely that all residents would own or be permitted to store a vehicle while living at the Project Site; also, the Project’s proximity to commercial uses and transit options would encourage walking and further reduce vehicle trips associated with the Project. Further, the existing motel and restaurant uses on the Project Site are currently generating vehicle trips, which are not accounted for in this analysis. As such, considering that the motel and restaurant uses are being replaced by affordable housing and social services, the Project would likely generate fewer vehicle trips when compared with existing conditions.</p> <p>Regarding public transportation, the Project Site’s location affords multiple alternative transportation options, such as sidewalks connecting the Project Site to the urban street network in downtown Sacramento, light rail service located across 12<sup>th</sup> Street to the east (the Sacramento Regional Transit Blue Line, which connects downtown Sacramento to Cosumnes River College to the south and Watt/I-80 to the north), and a bus stop on the H Street Project Site frontage for Sacramento Regional Transit’s Route 129, which provides service during peak times.</p> <p>Therefore, the Project would not result in a significant impact to transportation and mobility.</p> <p><b>References:</b></p> <p>Governor’s Office of Planning and Research, Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018.</p>
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Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>NATURAL FEATURES</b>		

Unique Natural Features, Water Resources	(2) No impact anticipated	<p>The Project Site is a flat, 1.1-acre group of two parcels located in a highly urbanized area. As stated above, the Project Site is characterized by an existing three-story motel, a two-story restaurant building, and surface parking. As such, nearly the entire Project Site is covered by impervious surfaces, except for limited decorative landscaping (including two trees) located on the northwest portion of the Project Site. 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 immediately adjacent to the Project Site that are of special social/cultural, economic, educational, aesthetic, or scientific value.</p> <p>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, commercial uses, streetlights, and major arterial streets), the Project would not impact any natural features, water resources, or geologic features.</p> <p><b>References:</b></p> <p>US Fish and Wildlife Service, National Wetlands Inventory. Wetlands near Project Site, generated October 12, 2021.</p>
Vegetation, Wildlife	(2) No impact anticipated	<p>Because the Project Site is located within a fully urbanized area, and because the Project Site is nearly entirely covered by impervious surfaces, apart from some limited areas of decorative landscaping, there are no existing remnant or endemic plant communities on the Project Site. As such, the Project would not damage or destroy such 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. The Project proposes to install new landscaping in the outdoor seating area on the western portion of the Project Site, identified in <b>Figure 4</b>, and all existing landscaping would remain in place. Due to the disturbed nature of the Project Site and the limited amount of existing landscaping, the Project Site would not support special-status species listed by the USFWS, or species listed on the California Department of Fish and Wildlife's Special Animals and Plants Lists, as described in the Endangered Species Act section of this Environmental Assessment.</p>
Other Factors		None Identified.

**Additional Studies Performed:**

**Michael Baker International:**

Cultural Resources Technical Memorandum, November 2021.

**Additional Technical Studies:**

AEI Consultants, Incorporated, Phase I Environmental Site Assessment, 1100 H Street, Sacramento, October 1, 2021

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

Field Inspection completed by AEI Consultants as part of preparation of the Phase I Environmental Site Assessment, dated October 1, 2021.

**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 staff-level Site Plan and Design Review.

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

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

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

According to 24 CFR 58.32, a Responsible Agency must group together and evaluate as a single project all individual activities which are related either on a geographical or functional basis, or are logical parts of a composite of contemplated actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

The Proposed Project would involve rehabilitation of an existing 94-room motel into 92 units of affordable housing with an additional manager's unit, as well as construction of outdoor amenities and retrofitting the existing restaurant building into spaces for providing social services to Project residents. As stated above, the Project's construction- and operation-related noise would be far below any City noise standard. With regard to air quality, the Proposed Project would not result in short- or long-term air quality impacts, as emissions would be far below SMAQMD-adopted construction or operational thresholds. 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."<sup>10</sup> Since the Proposed Project would involve 100 percent affordable residential units and one manager's unit and because the Project Site is located within a dense, urban area

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<sup>10</sup> Governor's Office of Planning and Research, *Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018.

directly adjacent to a light rail transit station, 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]**

#### **Alternate Site**

Because the Project would involve rehabilitation of an existing motel and restaurant building, it is not possible for the Project to be conducted on another site. There may be other motel properties within the downtown Sacramento area that could be rehabilitated to provide affordable housing and social services; however, because the proposed Project Site is available and would have existing spaces to provide social services for the Project's residents (in the form of the existing restaurant building), the Project is uniquely suited to the Project Site and the Proposed Project is preferred over this alternative.

#### **Alternate Scope**

The primary purpose of the Project is to provide affordable housing opportunities within downtown Sacramento to address housing needs identified by the SHRA and the City of Sacramento. This alternative would involve demolition of the existing motel and restaurant buildings and construction of a multifamily residential or mixed-use tower up to 85 feet tall, as allowed in the C-2-SPD zone.<sup>11</sup> Because this alternative would involve demolition of the existing structures, this Project would involve an increase in emissions associated with demolition and debris hauling, as well as emissions associated with site preparation, grading, and building construction, as compared with the Proposed Project. Given the greater amount of demolition and construction emissions and noise associated with this alternative, as well as greater amount of construction materials that would be required when constructing an entirely new structure, the Project is preferred over this alternative.

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

Under this alternative, the Project would not occur and the Project Site would continue to operate as a 94-room motel and a restaurant. As discussed above, the Project would result in similar or fewer air quality emissions or transportation impacts as compared with the existing uses. As such, under the No Action alternative, some environmental impacts, such as air quality emissions and transportation impacts (i.e., number of trips to the site) would be equal or more severe than air quality emissions and transportation impacts resulting from the Proposed Project. Further, as discussed in the Statement of Purpose and Need for the Proposal Section, above, the SHRA has documented a persistent demand for affordable housing for low- and moderate-income households. Over time, it is possible that the motel and restaurant building would be sold to another developer and redeveloped with a use permitted within a C-2 zone (i.e., residential or commercial uses), which would not result in the benefits associated with reusing existing structures (as opposed to demolishing the existing structures) and providing new affordable housing units. Therefore, the Project is preferred over this alternative.

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

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<sup>11</sup> SCC: Section 17.228.117, Multi-unit Dwellings; Section 17.444.090, Central City Special Planning District / C-2 General Commercial Zone

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.

Law, Authority, or Factor	Mitigation Measure
<p>Historic Preservation</p> <p><b>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</b></p>	<p><b>CUL-1 Cultural and Tribal Resources Sensitivity Training:</b> The Project developer/applicant shall retain a qualified archaeologist to provide archaeological sensitivity training to all personnel planned for earth moving activities prior to the beginning of Project-related ground disturbing activities. The training session will focus on how to identify archaeological resources (including Tribal resources) that may be encountered and the procedures to be followed if identified. A qualified archaeologist must be supervised by a Secretary of the Interior (SOI) qualified archaeologist.</p> <p><b>CUL-2 Archaeological Monitoring Program:</b> The Project developer/applicant shall retain a qualified archaeologist to prepare an Archaeological Monitoring Plan (AMP) prior to ground-disturbing activities. The AMP must describe the procedures for the appropriate identification and treatment of archaeological resources (including Tribal resources) if any are discovered during grading or construction activities. The plan shall include provisions to halt work in the immediate area in the event of a discovery to allow for resource evaluation. The plan shall also identify the need for archaeological monitoring and provide detailed guidance outlining when and for what activities monitors must be present. The qualified archaeologist shall also prepare a report of findings after construction is completed, and shall transmit this report to SHRA.</p> <p><b>CUL-3 Tribal Monitoring:</b> The Project developer/applicant shall contact consulting tribes at least 2 weeks prior to Project ground-disturbing activities to retain the services of a paid/contracted Tribal Monitor(s). The duration of the</p>

monitoring and construction schedule shall be determined at this time. Field monitoring activities shall be documented on a Tribal Monitor log. The total time commitment of the Tribal Monitor will vary depending on the intensity and location of construction and the sensitivity of the area, including the number of finds. A contracted Tribal Monitor(s) from traditionally and culturally affiliated Native American Tribes shall monitor the grading, or other Project-related ground-disturbing activities. Tribal Representatives and Tribal Monitors act as a representative of their Tribal government and have the authority to identify sites or objects of cultural value to Native American Tribes and recommend appropriate treatment of such sites or objects. Tribal Monitors or Representatives have the authority to request that work be temporarily paused, diverted, or slowed within 100 feet of the direct impact area if sites or objects of significance are identified. Only a Tribal Monitor or Representative from a culturally and geographically affiliated tribe can recommend appropriate treatment and final disposition of cultural, or archaeological Tribal resources.

**CUL-4 Post Review Discoveries:** If potentially significant Tribal cultural resources or archaeological resources are discovered during Project-related ground disturbing construction activities, all work shall cease within 100 feet of the find. The Tribal Monitor discussed in **Mitigation Measure CUL-3**, or a Native American Representative from traditionally and culturally affiliated Native American Tribes shall be contacted immediately to assess the significance and cultural value of the find and make recommendations for further evaluation and treatment, as necessary. A qualified cultural resources specialist meeting the Secretary of Interior's Standards and Qualifications for Archaeology, may also assess the significance of the find in joint consultation with Native American Representatives to ensure that Tribal values are considered. Work shall remain suspended or slowed within 100 feet of the find until the resource is evaluated, which shall occur within one day, but no more than two days, of the find.

The Project developer/applicant shall coordinate with a UAIC Tribal Representative any necessary investigation and evaluation of the discovery under the requirements of Section 106 of the National Historic Preservation Act. Preservation in place is the preferred alternative and every effort must be made to preserve the resources in place, including through project redesign. The contractor shall implement any measures deemed by the lead agency to be necessary and feasible to preserve in place, avoid, or minimize significant effects to the resources, including the use of a paid Native



	<p>American Monitor whenever work is occurring within 100 feet of the find.</p> <p>If adverse impacts to a cultural resource or unique archeological resources occurs, then consultation with UAIC and other traditionally and culturally affiliated Native American Tribes regarding adverse effects shall occur, pursuant to 36 Code of Federal Regulations §800.5, Assessing Adverse Effects, and §800.6, Resolution of Adverse Effects.</p> <p><b>CUL-5 Native American Consultation:</b> The SHRA shall continue consultation with any Native American tribes that may request consultation. Through this consultation process, if deemed necessary by consulting Native American tribes and the SHRA, the SHRA shall develop a testing, treatment, and monitoring plan in collaboration with the consulting tribes pursuant to 36 CFR 800.6 (Resolution of adverse effects) and 800.13 (Post-review discoveries).</p>
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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:  Date: December 14, 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).