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

Project Information

Project Name: Rodeway Inn Homekey Conversion (RWI) Project

Responsible Entity: Sacramento Housing and Redevelopment Agency

Grant Recipient (if different than Responsible Entity):

State/Local Identifier: The project is located at 25 Howe Avenue, City of Sacramento, California (APN: 079-0200-055).

Preparer: Sacramento Housing and Redevelopment Agency

Certifying Officer Name and Title: LaShelle Dozier, Executive Director

Grant Recipient (if different than Responsible Entity):

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

Direct Comments to:

Eduardo Dominguez
Management Analyst – Environmental Analyst
Sacramento Housing and Redevelopment Agency
801 12th St., Sacramento, CA 95814
Email: edominguez@shra.org or Telephone: 916-440-1377
**Project Location:**

The project is approximately 1.67 acres and is located at 25 Howe Avenue, City of Sacramento, California (APN: 079-0200-055).

The project lies within Township 8 North, Range 5 East, and Section 15 in USGS quadrangle is Sacramento East. See Figures 1 and 2 and the end of this document.

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

The proposed project involves the acquisition and conversion of an existing hotel to provide affordable residential housing. The project would convert 101 hotel rooms into 70 permanent affordable supportive housing for eligible homeless and at-risk individuals (Figure 2). The units would be converted into 3 different studio apartment plans, plus 1 irregular staff unit. Out of the 70 units, 11 of the units would be mobility units and 7 would be vision and hearing disability units.

No demolition would occur of the existing building. Renovation would include new interior and exterior paint, new windows, new interior and exterior fixtures, new flooring, resurfaced cabinetry, and new appliances. These reconfigurations would include ensuring all units meet local, state, federal codes and regulations.

Interior amenities would include existing common areas, lobby, lounge, and restrooms. A kitchen would be added to the lounge/meeting area. One former unit is already an office and would serve property management along with the front desk. Five additional rooms near the lobby would be converted into offices/small meeting spaces for resident services and case management. The commercial laundry room would be converted to a resident laundry room.

Landscaping improvements would consist of installing drought-tolerant plants and shrubs, removal and replacement of trees, adding bark/mulch, and a Smart programmable automated irrigation system. The existing pool and equipment would all be removed and filled in for recreation, gathering/landscaping uses. The addition of a water feature is being considered. Barbeque, seating, smoking areas, and ball court would be created at the south parking lot; and at the far western parking area, pet areas would be constructed.

The parking lot would be repaved and restrriped where the paving is badly damaged with a combination of complete AC paving replacement at drive aisles, and non-conforming ADA parking. A grind and overlay would be used in the parking stalls. The existing security surveillance camera system would be upgraded, and additional cameras would be added. Camera locations would include primary ingress/egress points to and from the site, parking lots, and indoor and outdoor common areas where people congregate (including management office, and laundry room). The project would repair/replace curb and sidewalk areas where there is excessive cracking, tree root damage and non-conforming ADA path of travel slopes and barriers.

Vehicle access to the property is located on the southeastern corner of the property off Howe Avenue. New fencing would be installed to enclose the converted south parking lot area into a landscaped gathering space. An emergency only pedestrian access gate would be included, the existing 3-foot-tall front vehicle gate entry system would be replaced with 6-foot-tall system, and a pedestrian gate system would be added.

All staging areas during construction would be placed within the existing parking lot.
**Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:**

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

The project would also contribute to meeting the goals and policies of the County of Sacramento 2021-2029 Housing Element. The County of Sacramento is committed to responding to homelessness for individuals and families, and to making the community stronger and safer for all. On any given night in Sacramento, thousands of people are unsheltered, and many suffer from mental health issues and addiction. During 2019, an estimated 10,000 to 11,000 individuals experienced homelessness over the course of the year. An estimated 93 percent are originally from Sacramento or long-term residents.

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

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

The project site is approximately 1.67-acres and is currently occupied by a motel. The site contains a three-story building, a pool, and an asphalt parking lot. The existing parking lot provides uncovered standard parking spaces with landscaping around the perimeter of the site and throughout the parking lot. The existing motel includes 101 rooms and a swimming pool. The site is surrounded by a white iron fence.

Driveway access to the property is located on the southeastern corner of the site on Howe Avenue. The site is in a commercial area with a storage facility to the west and a Comfort Inn Hotel, Goodwill and Chevron Gas Station to the south. In the vicinity, there are residential homes, a Starbucks, a Mexican Restaurant, a Justice Center and a Car Wash.

The area has good regional linkage via Highway 50 and public transportation is provided by Sacramento Regional Transit (RT). Approximately 0.3 miles southeast from the site are the bus stops for RT’s line 211 and the Power Inn Light Rail Station, which provide access to major medical centers, and other shopping in the vicinity at less than 30-minute intervals.

Housing costs within the County hit an all-time high in 2020 and have continued to increase in price. Similar to home values, rental costs have also increased significantly within the County. As of 2023, the average monthly asking rent was $1,676. This rent amount is not affordable to an extremely low-, very low-, and low-income household. Renters in Sacramento County need to earn $32.23 per hour - 2.1 times the state minimum wage - to afford the average monthly asking rent of $1,676. 81% of extremely low-income households in Sacramento County are paying more than half of their income on housing costs compared to 1% of moderate-income households. The current standard of housing affordability indicates that households spending 30 percent or more of their gross income on housing are “cost burdened.” The impact of high housing costs disproportionately affects extremely low-, very low-, and low-income households (Sacramento County 2023).
### Funding Information

<table>
<thead>
<tr>
<th>Grant Number</th>
<th>HUD Program</th>
<th>Funding Amount</th>
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<tbody>
<tr>
<td></td>
<td>Project Based Vouchers</td>
<td>69 vouchers</td>
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</tbody>
</table>

**Estimated Total HUD Funded Amount:**

69 project based vouchers

**Estimated Total Project Cost** (HUD and non-HUD funds) [24 CFR 58.32(d)]:

$25,000,000

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

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

#### Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6

<table>
<thead>
<tr>
<th>Compliance Factors</th>
<th>Are formal compliance steps or mitigation required?</th>
<th>Compliance determinations</th>
</tr>
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<tbody>
<tr>
<td></td>
<td>Yes</td>
<td>No</td>
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</table>

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

<table>
<thead>
<tr>
<th>Airpport Hazards</th>
<th>Yes</th>
<th>No</th>
<th>The proposed project is located approximately 4.57 miles from the closest civilian airport (Executive Airport) and is not within the overflight zone. The project is not within a Runway Potential Zone / Clear Zone (RPZ/CZ) or Accident Potential Zone (APZ).</th>
</tr>
</thead>
<tbody>
<tr>
<td>24 CFR Part 51 Subpart D</td>
<td>![Yes]</td>
<td>![No]</td>
<td>Exhibit 2-A</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Coastal Barrier Resources</th>
<th>Yes</th>
<th>No</th>
<th>The proposed project is located 79 miles inland and is not within a coastal zone. California does not contain protected coastal barrier resources.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]</td>
<td>![Yes]</td>
<td>![No]</td>
<td>Exhibit 2-B</td>
</tr>
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<table>
<thead>
<tr>
<th>Flood Insurance</th>
<th>Yes</th>
<th>No</th>
<th>The project site is located within Zone X Area with reduced flood risk due to a levee, per FEMA panel 06067C0195H effective 8/16/2012. No flood insurance is required.</th>
</tr>
</thead>
</table>
Clean Air

Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93

The Sacramento Metro area is designated as “maintenance” for the 1971 carbon monoxide standard. Sacramento County is designated as “non-attainment” for the 2006 24-hour PM2.5 standard of 35 ug/m3. The Sacramento Metro is also designated non-attainment “serious” for the primary 8-hour federal ozone standard of 0.070 ppm. The Metro area meets all other air quality standards. Source: https://www.epa.gov/green-book

The US EPA delegates attainment of air quality standards to the states. California in turn has delegated local air emission regulation to the 35 air districts. This project falls within the Sacramento Metropolitan Air Quality Management District (SMAQMD).

The SMAQMD sets screening levels below which projects are de facto considered non-significant emission sources. Such sources would not interfere with attainment or maintenance of a federal air quality standard. SMAQMD operational screening levels for new construction of low-rise apartment projects are less than 740 units for ozone precursors, and 1,485 units for PM, with construction Best Management Practices incorporated. Fugitive dust control is required by District Rule 403 and enforced by SMAQMD staff, and this is considered Best Management Practice.

As a rehabilitation project, emissions would be far below SMAQMD’s thresholds of significance, and they are also well below the de minimus levels for federal conformity (65 pounds per day ozone precursor = 12 tons per year (SMAQMD), vs. the 25 tons (severe), and 15 tons per year PM2.5 (SMAQMD) vs. 100 tons per year (moderate) federal de minimus threshold). The proposed project is thus exempt from federal general conformity requirements.

Coastal Zone Management

Coastal Zone Management Act, sections 307(c) & (d)

The proposed project is located 79 miles inland from the coast and is not within a coastal zone.

Contamination and Toxic Substances

A Phase I Environmental Site Assessment (ESA) was prepared to identify and confirm, to the
<table>
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<tr>
<th>Section</th>
<th>Description</th>
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<tbody>
<tr>
<td>24 CFR Part 50.3(i) &amp; 58.5(i)(2)</td>
<td>extent feasible, any potential for Recognized Environmental Conditions resulting from the improper use, manufacture, storage, and/or disposal of hazardous or toxic substances at or in the vicinity of the project site that may be encountered. The ESA has revealed no evidence of recognized environmental conditions, controlled recognized environmental conditions, or significant data gaps in connection with the proposed project site.</td>
</tr>
<tr>
<td><strong>Endangered Species</strong></td>
<td>A review of special status species databases including the California Natural Diversity Database, United States Fish and Wildlife Service Information for Planning and Conservation Database, and the California Native Plant Society’s Inventory of Rare and Endangered Plants of California was completed in order to identify special status species that may occur within the project area. No federally listed species were observed during the site visit on April 4, 2023. There is only landscape vegetation throughout the property, including mature trees. The project involves interior rehabilitation with minor outdoor construction of a ball court and an open space area with pet areas in a developed area. Based on the results of this review, its location within an urbanized area, and the site visit, no habitat for special status species is present within or adjacent to the project area.</td>
</tr>
<tr>
<td><strong>Explosive and Flammable Hazards</strong></td>
<td>Based on aerial imagery and the site visit, land uses within 1 mile are residential with supporting commercial uses. The site is located within 1 mile of an existing above-ground storage container for explosive or flammable fuels or chemicals. There is an above-ground storage tank at a 7 Eleven Gas Station approximately 0.1 miles south. The propane tank is less than 1,000 gallons (cylinder is approximately 4’x10’/3.5’ diameter; volume of a cylinder is ( \pi \times (radius \ squared) \times height = 4 \times \pi \times 10 = \text{approximately 125}. ) At 7.48 gallons per cubic foot, 125*7.48 is 940 gallons). Containers of liquified petroleum gas (LPG) or propane with a water volume capacity of 1,000 gallons or less that meet the requirements of the 2017 or later version of National Fire Protection Association</td>
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<th>Yes</th>
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**Exhibit 2-F**

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**Exhibit 2-G**
(NFPA) Code 58 are exempt from this requirement. Therefore, since the tank is less than 1,000 gallons it would have no effect on the proposed project.

The California Environmental Protection Agency (CalEPA) Regulated Site Portal was also used to determine if there were any facilities with ASTs within a 1-mile radius of the site. One site with an AST was identified just outside the 1 mile radius of the project site. The Site is listed as Arden Sewer Pump Station. The site was listed to have tanks that can hold up to 1,200 gallons of fuel. The Acceptable Distance Calculator determined that the acceptable distance for Thermal Radiation for People is 298 ft and the acceptable distance for Thermal Radiation for a building is 55 ft. The project is approximately 1,200 feet northwest of the tank. Therefore, the tanks would not pose a threat to the project.

In addition, no ASTs were identified in the Phase I Environmental Site Assessment. Please see Exhibit 2-H for a map showing the distance to the 7 Eleven Gas Station from the proposed project site, the CalEPA Regulated Site Portal Map, and ASD Calculations.

<table>
<thead>
<tr>
<th>Farmlands Protection</th>
<th>Yes</th>
<th>No</th>
<th>The proposed project site is in a fully developed area. According to the California Department of Conservation Division of Land Resource Protection Farmland Mapping and Monitoring Program, the site does not meet the definition of prime or unique farmlands and is not of statewide or local significance. There is no farmland within 0.5 miles of the project.</th>
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<table>
<thead>
<tr>
<th>Floodplain Management</th>
<th>Yes</th>
<th>No</th>
<th>The project site is located within Zone X Area with reduced flood risk due to a levee, per FEMA panel 06067C0195H effective 8/16/2012.</th>
</tr>
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<table>
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<tr>
<th>Historic Preservation</th>
<th>Yes</th>
<th>No</th>
<th>A records search of the APE and a 100-meter buffer was requested from the North Central Information Center (NCIC). The records search results did not identify any historic or prehistoric cultural resources recorded in the APE, but five historic resources have been previously recorded within 100 meters of the APE. These resources</th>
</tr>
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</table>

Exhibit 2-H

Exhibit 2-I

Exhibit 2-J
within the indirect APE include a transmission line located on the east side of Howe Avenue and four structures to the southwest of the APE. Records indicate all five resources have previously been considered not eligible for inclusion in the National Register of Historic Places or California Register of Historical Resources. Presently, no prehistoric cultural resources have been formally recorded within or adjacent to the APE.

A search of the Native American Heritage Commission (NAHC) Sacred Lands File was initiated for the project area on April 4, 2023; the result was positive. Pursuant to Section 106, consultation was initiated with known Native American Tribes in the region on April 14, 2023, based on a recent nearby project NAHC list, to solicit feedback regarding potential Native American resources within or in proximity to the project site and follow up emails were made May 8, 2023. Wilton Rancheria, United Auburn Indian Community and the Buena Vista Rancheria of Me-Wuk Indians have requested inadvertent discoveries avoidance measures for proposed project. A log of communication is provided is attached.

Per 36 CFR Part 800.3(c)(4) Failure of the SHPO/THPO to respond, SHPO concurs with the determination of no adverse effect on a historic resource.

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<tr>
<th>Noise Abatement and Control</th>
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<tr>
<td>Yes</td>
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</table>

Noise levels in the project area are defined primarily by traffic on Highway 50 and Howe Avenue. The average day/night sound levels are 71 dBA, which falls into the Normally Unacceptable range, according to HUD Noise Standards. The project site is predicted to be exposed to future exterior noise levels within the normally unacceptable 65-75 dBA DNL range for HUD projects. A noise study concluded that an exterior-to-interior noise level reduction of 25 dBA would be required to meet HUD Standards.

To achieve a noise level reduction of 25 dBA, specific design elements would be incorporated into the residential building facing Howe Avenue and a 6-foot sound wall must be incorporated into the designs for the perimeter of the outdoor area to block noise from Howe Avenue. In addition,
noise from construction activities would increase levels in the vicinity; thus, require additional noise control measures. Noise control measures shall be incorporated into designs to the satisfaction of SHRA before construction begins on the proposed project.

### Exhibit 2-L

<table>
<thead>
<tr>
<th><strong>Sole Source Aquifers</strong></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</td>
<td>☑️</td>
<td>☐️</td>
</tr>
<tr>
<td>According to the Environmental Protection Agency (EPA) Sole Source Aquifer (SSA) interactive online map, the project location does not lie above a sole source aquifer. Therefore, the Safe Drinking Water Act does not apply.</td>
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### Exhibit 2-M

<table>
<thead>
<tr>
<th><strong>Wetlands Protection</strong></th>
<th>Yes</th>
<th>No</th>
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<tbody>
<tr>
<td>Executive Order 11990, particularly sections 2 and 5</td>
<td>☐️</td>
<td>☑️</td>
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<tr>
<td>According to the National Wetlands Inventory (NWI) interactive online map, the proposed project location is not located on a wetland identified by the U.S. Fish and Wildlife Services. There are no wetlands identified within the vicinity of the proposed project site.</td>
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### Exhibit 2-N

<table>
<thead>
<tr>
<th><strong>Wild and Scenic Rivers</strong></th>
<th>Yes</th>
<th>No</th>
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<tbody>
<tr>
<td>Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</td>
<td>☐️</td>
<td>☑️</td>
</tr>
<tr>
<td>The proposed project would be constructed in a commercial area that is surrounded by a mix of residential, commercial uses and Highway 50. The closest listed wild and scenic river near the project area is the American River, approximately 0.6 miles to the north. The area between the American River and the project site is fully developed.</td>
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### Exhibit 2-O

<table>
<thead>
<tr>
<th><strong>ENVIRONMENTAL JUSTICE</strong></th>
<th>Yes</th>
<th>No</th>
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<tbody>
<tr>
<td>Environmental Justice Executive Order 12898</td>
<td>☑️</td>
<td>☐️</td>
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<tr>
<td>The project area encompasses government buildings, retail businesses, motels, and apartments or condominiums. Nearby major local streets/highways include US Hwy 50 about 1,000 feet to the north, Howe Avenue and Folsom Boulevard are also major roads within 400 feet of the Project. Sacramento Executive Airport is about 4.57 miles to the southwest, and Mather Airport is about 5 miles east. These airports support general aviation, government, and cargo functions. There is also a railroad freight line within 1,000 feet of the project. These are all local sources of air pollution such as PM2.5. Three EJScreen model runs were performed to estimate if the motel conversion would</td>
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</table>

Three EJScreen model runs were performed to define the EJ communities and the potential exposure to adverse effects from the proposed project. These runs identified potential exposure to air pollution from the project and its proposed impact on air pollution levels in the vicinity. The impact of the proposed project on the environment was evaluated in terms of its potential effects on air quality, water quality, and wildlife. The project was found to have no significant environmental impact, and therefore, it was determined to be consistent with the goals of the EJ policy.
disproportionally impact vulnerable populations. Reports for these model runs are included below. EJScreen model runs are typically performed for the immediate project site area and then at increasing distances in concentric circles. This allows for comparison between the project site and nearby areas. The model version V2.11 was used in April 2023 to estimate EJ metrics. The model considers five factors to calculate a “Demographic Index”. The factors considered are percent low-income, percent limited English-speaking, percent less than high school education, percent unemployed, and low life expectancy. (Source: https://www.epa.gov/newsreleases/epa-launches-updates-environmental-justice-mapping-tool-ejscreen)

The Demographic Index (DI) is calculated for a circle with the project as the center point. The values are expressed as a percentile of the state average (%) for each distance is as follows:

- 0.25 miles, with a population of about 643 people, the Demographic Index is 69%
- 0.5 miles, with a population of about 5,184, the Demographic Index is 74%, and
- 1 mile, with a population of about 11,723, the Demographic Index is 60%.

There is a roughly 20% difference between the one-half mile circle and the one-mile circle. This is probably because the number and size of large parking lots and buildings within the one-mile area skews the population dynamics lower at one-mile. The raw data from the model output is contained in the attached sheets.

EPA recommends considering pollution scores for various metrics that are over the 80th state percentile. The entire area shows high scores for businesses with Risk Management Plans (RMP), Air Cancer Risk, Respiratory Hazard Index, PM2.5 exposure, high traffic levels and Superfund sites.

Essentially, the population of the entire area is exposed to unhealthy air quality and proximity to superfund sites and businesses using potentially dangerous chemicals regulated by an RMP. Affected facilities that use, or store extremely hazardous substances must prepare and submit
RMPs to the US EPA. These plans must be updated every five years. The high cancer and respiratory hazard index scores are from proximity to high volumes of vehicle traffic on the major roads and highways in the immediate area. For instance, using the most recent Caltrans data (2017) for Highway 50, average daily traffic for both directions were about 218,000 vehicles. Vehicles on other local roads contribute to emissions as well. Intermittent aircraft traffic at regional airports and trains are lesser contributors.

Traffic volumes have probably increased since the 2017 counts, generally about 2% per year. The typical highway mix includes about 5% heavy diesel trucks. Diesel particulate matter is a known carcinogen with no acceptable exposure level. I-50 is a major haul route for heavy trucks in both directions. Likewise, Folsom Boulevard and Howe Avenue carry high daily traffic volumes. Because EJScreen shows high levels of PM2.5 and air toxics, it is recommended that enhanced air filtration for the project HVAC systems with at least a MERV 13 rating. EPA guidance shows that enhanced HEPA filtration can provide 60% to 90% improved indoor air quality. People typically spend about 22.5 hours per day indoors, and enhanced air filtration with MERV13 or better rating will provide residents a substantial long-term health benefit.

Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. All conditions, attenuation or mitigation measures have been clearly identified.

Impact Codes: Use an impact code from the following list to make the determination of impact for each factor.
(1) Minor beneficial impact
(2) No impact anticipated
(3) Minor Adverse Impact – May require mitigation
(4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

<table>
<thead>
<tr>
<th>Environmental Assessment Factor</th>
<th>Impact Code</th>
<th>Impact Evaluation</th>
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<tbody>
<tr>
<td><strong>LAND DEVELOPMENT</strong></td>
<td></td>
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</tr>
<tr>
<td>Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design</td>
<td>2</td>
<td>The proposed project is zoned as C2-General Commercial. The project would rehabilitate existing motel units and convert them into permanent supportive housing for the homeless. The use is consistent with the City’s zoning and the general plan. Refs 2, 3</td>
</tr>
<tr>
<td>Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff</td>
<td>2</td>
<td>The topography of the site is relatively flat. The project plans to improve the interior and exterior of the building. The project involves interior and exterior rehabilitation and new improvements such as the development of outdoor recreation areas, new roofing, and exterior repairs and painting. The project would have minimal effect on soils, erosion, or drainage. Refs 2, 3</td>
</tr>
<tr>
<td>Hazards and Nuisances including Site Safety and Noise</td>
<td>2</td>
<td>A Phase I ESA was conducted for the proposed project site and did not identify any hazardous sites that could pose a threat to the proposed project. The project area has a baseline noise measurement of 71 dBA primarily due to freeway and roadway traffic. The project will convert an existing motel into a long-term supportive housing project which will not introduce any noise source that could potentially impact the project area nor increase traffic. The project would have no noise impact. Exhibit 2-F, 2-L.</td>
</tr>
<tr>
<td>Energy Consumption</td>
<td>2</td>
<td>Electric services are provided by the Sacramento Municipal Utility District (SMUD). The rehabilitation would meet all minimum construction standards for California including sustainable building methods and energy efficiency requirements. Ref 2</td>
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<tr>
<th>Environmental Assessment Factor</th>
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<tbody>
<tr>
<td><strong>SOCIOECONOMIC</strong></td>
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<tr>
<td>Employment and Income Patterns</td>
<td>1</td>
<td>Temporary construction jobs would be generated during the interior and exterior improvements of the project. The project will provide one full time program manager. Ref 1</td>
</tr>
<tr>
<td>Demographic Character Changes, Displacement</td>
<td>2</td>
<td>The project would provide 70 units of permanent supportive housing for people and families experiencing homelessness. The demographic character would change from transient motel uses to</td>
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permanent housing, which would be a minor change in demographics of the residents, but not character.

### COMMUNITY FACILITIES AND SERVICES

<table>
<thead>
<tr>
<th>Environmental Assessment Factor</th>
<th>Impact Code</th>
<th>Impact Evaluation</th>
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</thead>
<tbody>
<tr>
<td>Educational and Cultural Facilities</td>
<td>2</td>
<td>The project proposes to construct 70 units for at-risk homeless individuals. No children are anticipated for this facility. However, the Sacramento City Unified School District serves the project site; the site is served by Hubert Bancroft Elementary, Kit Carson International Academy and Rosemont High School if needed. The District ensures adequate school capacity to serve all children through development impact fees.</td>
</tr>
<tr>
<td>Commercial Facilities</td>
<td>2</td>
<td>There is a Chevron gas station with an attached convenience store and Wendy’s Restaurant within 0.2 miles of the project site, and commercial facilities are located throughout the area, with accessible public transit to further services.</td>
</tr>
<tr>
<td>Health Care and Social Services</td>
<td>2</td>
<td>UC Davis Health Center is approximately 3.8 miles west of the site and is a full-service medical center.</td>
</tr>
<tr>
<td>Solid Waste Disposal / Recycling</td>
<td>2</td>
<td>Rehabilitation would generate some construction waste and removal of debris. The residential uses would generate mixed waste consistent with levels currently generated by the motel uses. Construction waste would be disposed of at the Sacramento County Landfill facility on Kiefer Road, which is the primary municipal solid waste disposal facility in Sacramento County. Residential waste would be transferred by franchised haulers authorized by the Sacramento Solid Waste Disposal Company to collect commercial garbage and commingled recycling within the City.</td>
</tr>
<tr>
<td>Waste Water / Sanitary Sewers</td>
<td>2</td>
<td>Wastewater is conveyed through the Sacramento Area Sewer District sewer pipelines to the Sacramento Regional Wastewater Treatment Plant (SRWTP). As of 2010, the SRWTP system received 151 million gallons per day (mgd) with a maximum capacity of 181 mgd. The SWRWTP has determined it has enough long-term capacity for general plan buildout within the region due to increased water conservation efficiencies and requirements, and a continuing reduction in per capita wastewater demand. Conversion to permanent housing is not anticipated to change wastewater generation from the site.</td>
</tr>
</tbody>
</table>
Water Supply

2 Water is currently being provided to the project site by the Sacramento Suburban Water District. The Sacramento Suburban Water District has sufficient water rights and supply to meet project.

Public Safety - Police, Fire and Emergency Medical

2 Police:
The Sacramento County Sheriff’s Department is providing police protection services to the project site. The County’s Sheriff’s Department is located approximately 6.9 miles southwest of the site. Project conversion from motel use to occupancy of 70 residential units would have a negligible effect on current service demand.

Fire:
Sacramento Metropolitan Fire Department. The closest station to the project site is Fire Station 54, located approximately 2.9 miles east from the project site. Project conversion from motel use to occupancy of 70 residential units would have a negligible effect on current service demand.

Emergency Medical Services:
Sacramento Metropolitan Fire District. All SFD Engine and Truck Companies are utilized as EMS first responders and staffed with Firefighter-EMTs and/or Firefighter-Paramedics. Project conversion from motel use to occupancy of 70 residential units would have a negligible effect on current service demand.

Parks, Open Space and Recreation

2 Granite Regional Park is approximately 0.9 miles south of the project site. Although conversion to permanent housing could minimally increase demand for services, the increase is minor and can be accommodated at the existing parks.

Transportation and Accessibility

2 Sacramento Regional Transit Systems (RT) provides service to the project area via Bus Route 61 and Light Rail, which provides access to major medical centers and other shopping in the area at 30-minute intervals.

Environmental Assessment Factor | Impact Code | Impact Evaluation
--- | --- | ---
NATURAL FEATURES
Unique Natural Features, Water Resources | 2 | The site contains an existing motel building. No unique natural or water resources features are on the project site.

Vegetation, Wildlife | 2 | The site is fully developed. No unique vegetation or wildlife features are on the project site. However, existing trees on and adjacent to the...
The site could provide nesting habitat for birds protected under the Migratory Bird Treaty Act. The developer must incorporate the required avoidance measures into the building plans, as specified in Exhibit 2-G.

### Other Factors

<table>
<thead>
<tr>
<th>Environmental Assessment Factor</th>
<th>Impact Code</th>
<th>Impact Evaluation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>CLIMATE AND ENERGY</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| Climate Change Impacts        | 2           | Climate change is a crucial factor to consider when planning for new housing. Climate change is producing wider swings in the weather cycle. Climate change is already impacting California through warmer temperatures, tree loss due to drought and heat stress, reduced snowpack, and more destructive wildfires. The biggest impact may be on water resources, which are increasingly at risk. In any given year, a drought condition may exist, or there may be heavy flooding. The challenge is to plan for both and avoid undue risk. Buildings should also be designed for an increase in heat waves. Currently high heat is the primary cause of death from climate change, and this is expected to worsen.

Riskfactor.com and other web-based tools provide community specific information about increased heat stress, flooding, drought, and other climate-related factors. According to Riskfactor, in the Sacramento area, a 3-day heat wave temperature is 102 degrees F or higher. In 1990 the likelihood of a 3-day heat wave in any given year was about 37%. This has increased to 66% in 2020, and by 2050 is forecast to be 95% in any given year. By 2050, Sacramento is expected to experience 16 days over 102, compared to about seven days now. Home insulation and reliable electricity are essential to protect vulnerable populations during heat waves.

(Source: [https://riskfactor.com/](https://riskfactor.com/))

According to the FEMA flood mapping center (see Exhibit 2-J) the project lies outside the currently identified flood areas for 100-year and 500-year floods. Primary roads leading to the project site are also outside the mapped flood zones. Thus, this project location avoids potential flooding that is increasing with climate change in many areas.

| Energy Efficiency             | 2           | The proposed project is an infill residential development project on existing developed parcels, consistent with sustainability goals for the State and the City. The project would ensure that all exterior and interior lighting would be LED which have high energy efficiency and all switches, outlets and light fixtures not meeting current applicable codes will be replaced. |

**Exhibit 2-Q**

Ref 2, 3
Additional Studies Performed:


Field Inspection (Date and completed by):

Field observation performed by Catrina Vaz, NCE, April 4, 2023.

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

1. Unless otherwise noted, assessments based upon expertise and experience of Gail M. Ervin, Ph.D., NCE.
4. Sacramento Regional County Sanitation District. “Sacramento Regional Wastewater Treatment Plant.” Accessible from: [Sacramento Regional Wastewater Treatment Plant - Regional San](http://www.cityofsacramento.org/Community-Development/Resources/Online-Library/2035--General-Plan)

List of Tribes and People Consulted

1. Buena Vista Rancheria of Me-Wuk Indians: Rhonda Morningstar Pope, Chairperson
2. Colfax-Todds Valley Consolidated Tribe: Clyde Prout, Chairman, and Pamela Cubbler, Treasurer
3. Ione Band of Miwok Indians: Sara Dutschke Setchwaelo, Chairperson
4. Nashville Enterprise Miwok-Maidu-Nishinam Tribe: Cosme A. Valdez, Chairperson
5. Shingle Springs Band of Miwok Indians: Regina Cuellar, Chairperson
6. Tsi Akim Maidu: Don Ryberg, Chairperson
7. United Auburn Indian Community of the Auburn Rancheria: Gene Whitehouse, Chairperson
8. Wilton Rancheria: Jesus Tarango, Chairperson; Steven Hutchason, THPO; Dahlton Brown, Director of Administration
9. Nashville Enterprise of Miwok-Maidu-Nishinam Tribe; Cosme Valdez
10. State Office of Historic Preservation

List of Permits Obtained:

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

Public Outreach [24 CFR 50.23 & 58.43]:

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

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

The proposed project is the conversion of a motel to affordable housing units for individuals experiencing homelessness in the City of Sacramento. Currently, the site contains one building that is being used as a hotel, a pool, and an asphalt parking lot. The project proposes to convert the motel units into 70 permanent and supportive housing units for unhoused individuals. The project is consistent with City zoning and general plan policies. Minor air emissions related to interior rehabilitation and minor outdoor improvements would be temporary, and operational emissions would be below SMAQMD screening criteria; SMAQMD has determined that projects below these thresholds result in a less than cumulatively significant effect. The project contains standard uncovered parking lots and is within walking distance of bus services and access to regional light rail. Operational impacts related to traffic are anticipated to be similar to or less than existing conditions and cumulatively less than significant. There are minor exterior improvements proposed for the fully developed site, thus the project would not result in a cumulative loss of biological or cultural resources. Avoidance measures would be incorporated into the project for any inadvertent discoveries during construction. Therefore, the proposed project would result in no cumulatively significant effects on the human or natural environment.

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

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

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

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

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

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

**Summary of Findings and Conclusions:**

The environmental assessment has determined that the Rodway Inn Homekey Conversion Project would have no adverse effect on the human or physical environment as mitigated. The project would convert 70 permanent housing units for homeless individuals and families on site. The conversion of motel units to
permanent housing is consistent with adopted plans and policies, and the interior rehabilitation with proposed noise attenuation measures would not result in adverse effects on the human or natural environment. Whereas the site is already used for extended stay motel uses, there would be no change in demand for municipal services. The surrounding vicinity has transit access to a full range of commercial, medical, emergency, social, and recreational services to serve the future residents. There are no hazards located near or within the vicinity of the project site. Mitigation measures for noise would be incorporated into the building facades facing Howe Avenue. Mitigation for ambient air pollutants would be mitigated through air filters. The project would therefore have a beneficial effect on the quality of the human environment and no adverse effect on the natural environment.

**Mitigation Measures and Conditions [40 CFR 1505.2©]**

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

<table>
<thead>
<tr>
<th>Law, Authority, or Factor</th>
<th>Mitigation and Avoidance Measures</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Endangered Species</strong></td>
<td>Migratory Bird Treaty Act of 1918 (MBTA), codified at 16: If any construction activities (e.g., clearing, grubbing, or grading) are scheduled during the bird nesting season (typically defined by CDFW as February 1 to September 1), the City or approved construction contractor shall retain a qualified biologist to conduct a pre-construction survey of the project area, including a 100-foot buffer, as access is available, to locate active bird nests, identify measures to protect the nests, and locate any other special status species. The pre-construction survey shall be conducted no more than 14 days prior to the implementation of construction activities (including staging and equipment storage). Any active nest should not be disturbed until the young have fledged or under the direction provided by a qualified biologist. Any special status species shall not be disturbed without the direction of a qualified biologist. If an active nest is found during construction, disturbance shall not occur without direction from a qualified biologist.</td>
</tr>
</tbody>
</table>
| **Noise Abatement and Control** | The proposed project is predicted to meet HUD exterior and interior noise level standards assuming the following requirements are incorporated into the design for the new residential building portions of the project:  
  • The proposed project incorporates a sound wall 6 feet in height that is constructed at the approximate location shown on Figure 5 of the Noise Report to shield the proposed outdoor recreation area.  
  • The affected building facades of the project shall include the following noise control measures, as outlined on Figure 6 of the Noise Report: |
- Exterior facades shall include use of exterior stucco with 5/8” interior gypsum at Group 1 and Group 2 facades.
- STC 34 minimum rated glazing shall be used for Group 1 and STC 31 for Group 2 windows.
- Interior gypsum wallboards and gypsum ceiling shall be 5/8”.
- Where vents must face toward Howe Avenue, it is recommended that the duct work be increased in length and make as many “S” turns as feasible prior to exiting the dwelling. This separates the openings between the noise source and the living space with a long circuitous route. Each time the sound turns a corner, it is reduced slightly. Flexible duct work is preferred ducting for this noise mitigation. Where the vent exits the building, a spring-loaded flap with a gasket should be installed to reduce sound entering the duct work when the vent is not in use.
- Mechanical ventilation shall be provided to allow occupants to keep doors and windows closed for acoustic isolation.
- PTAC’s shall have a minimum STC rating of 30 in Group 1 and Group 2 areas.
- In lieu of these measures, an interior noise control report may be prepared by a qualified acoustic engineer demonstrating that the proposed building construction would achieve the HUD interior noise reduction requirement of 25-30 dBA.

**Historic Preservation**

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

**MM CUL-1: Unanticipated discoveries**

The following measure is intended to address the evaluation and treatment of inadvertent/unanticipated discoveries of potential tribal cultural resources (TCRs), archaeological, or cultural resources during a project’s ground disturbing activities.

If any suspected TCRs are discovered during ground disturbing construction activities, all work shall cease within 100 feet of the find, or an agreed upon distance based on the project area and nature of the find. A Tribal Representative from a California Native American tribe that is traditionally and culturally affiliated with a geographic area shall be immediately notified and shall determine if the find is a TCR (PRC §21074). The Tribal Representative will make recommendations for further evaluation and treatment as necessary.

When avoidance is infeasible, preservation in place is the preferred option for mitigation of TCRs under CEQA and UAIC, Wilton and BVR protocols, and every effort shall be made to preserve the resources in place, including through project redesign, if feasible. Culturally appropriate treatment may be, but is not limited to, processing materials for reburial, minimizing handling of cultural objects, leaving objects in...
place within the landscape, or returning objects to a location within the project area where they will not be subject to future impacts. Permanent curation of TCRs will not take place unless approved in writing by UAIC or by the California Native American Tribe that is traditionally and culturally affiliated with the project area.

The contractor shall implement any measures deemed by the CEQA lead agency to be necessary and feasible to preserve in place, avoid, or minimize impacts to the resource, including, but not limited to, facilitating the appropriate tribal treatment of the find, as necessary. Treatment that preserves or restores the cultural character and integrity of a TCR may include Tribal Monitoring, culturally appropriate recovery of cultural objects, and reburial of cultural objects or cultural soil.

Work at the discovery location cannot resume until all necessary investigations and evaluations are completed.

**MM CUL-2: Post Review Discoveries**

The following measure is intended to address post review discoveries of cultural resources that may be of religious and cultural significance to the United Auburn Indian Community of the Auburn Rancheria (UAIC), Wilton Rancheria, and the Buena Vista Rancheria of Me-Wuk Indians (BVR).

Cultural items include isolated artifacts, darkened soil (midden), shell fragments, faunal bone fragments, fire affected rock and clay, bedrock mortars, bowl mortars, hand stones and pestles, flaked stone, and articulated, or disarticulated human remains. In general, the UAIC, BVR and Wilton Rancheria does not consider archaeological data recovery or curation of artifacts to be appropriate or respectful. The types of treatment preferred by UAIC that protects, preserves, or restores the integrity of a cultural resource may include Tribal Monitoring, and recovery and reburial of cultural objects or cultural soil that is done with dignity and respect. Recommendations of the treatment of a cultural resource will be documented in the project record. For any recommendations made by traditionally and culturally affiliated Native American Tribes that are not implemented, a justification for why the recommendation was not followed will be provided in the project record.

If potentially significant cultural resources are discovered during ground disturbing construction activities, all work shall cease within 100 feet of the find. A Native American Representative from traditionally and culturally affiliated Native American Tribes 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 (archaeologist) 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 applicant shall coordinate with a UAIC, Wilton Rancheria and BVR Tribal Representatives 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.

If adverse impacts to a cultural resource or unique archeological resources occurs, then consultation with UAIC, BVR and Wilton Rancheria 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. Activities within one hundred feet of the find and immediately contact the qualified Monitor. Work shall not resume until the potential resource can be evaluated by the qualified Monitor. The qualified Monitor shall be empowered to halt or redirect ground-disturbing activities away from the vicinity of the find until the qualified Monitor has evaluated the find, determined whether the find is culturally sensitive, and designed an appropriate short-term and long-term treatment plan. The Monitor shall determine the significance of the finding. If determined to be significant the Monitor shall prepare a treatment plan in consultation with local experts, Native American Representatives, and the City Planning & Development Services Department.

### Environmental Justice

**Executive Order 12898**

Because EJScreen shows high levels of PM2.5 and diesel particulate matter, it is recommended that enhanced air filtration for the Project HVAC systems with at least a MERV 13 rating. EPA guidance shows that enhanced HEPA filtration can provide 60% to 90% improved indoor air quality. People typically spend about 22.5 hours per day indoors, and enhanced air filtration with MERV13 or better rating will provide residents with a substantial long-term health benefit.
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: 7/14/23

Name/Title/Organization: _________ Gail M. Ervin, Ph.D., NCE___________

Certifying Officer Signature: ___________________________ Date: 07/14/2023

Name/Title: _______________ Eduardo Dominguez, Environmental Analyst, SHRA

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).
Rodeway Inn Homekey Conversion (RWI) Project
Sacramento County
Project Area Location Map

Legend

- Project Area

County: Sacramento
USGS 7.5' Quad Map: Sacramento East
TRS: T.08N, R.05E, Section 15
Legend
- Project Area

Rodeway Inn Homekey Conversion (RWI) Project
County of Sacramento
Project Detail Map

Source: Bing Aerial Basemap
Job Number: 487.47.55
Drawn by: cvaz
Date: 3/29/2023
Figure: 2