



INTERDEPARTMENTAL M E M O

DATE: March 11, 2021

TO: Planning Commission

FROM: Joelle Inman *JBI*
Environmental Coordinator

SUBJECT: Memo for Sacramento County 2021-2029 Housing Element Update

The proposed Sacramento County 2021-2029 Housing Element Update (project) would amend the Sacramento County General Plan to update the Housing Element. An Initial Study/Negative Declaration was prepared for the project and released for public review on March 29, 2021 through April 28, 2021.

Since the release of the Initial Study/Negative Declaration on March 29, 2021, minor changes were made to the Project Description to reflect a reduced shortfall of land and units to meet the County's lower-income Regional Housing Needs Allocation (RHNA). The amount of land that the County will be required to rezone was reduced from 155 to 142 acres and the amount of lower-income units was reduced from 3,102 to 2,834 units. The language of the rezone program (program A1) was changed to indicate that the County will rezone 164 acres instead of 178 acres to provide a buffer to accommodate for "no net loss". The revisions to the Project Description also indicate that several parcels that were included in the inventory for lower-income units during the previous Housing Element cycle will be included in the rezone program (program A1) and will reduce the shortfall once rezoned. The attached version of the Initial Study/Negative Declaration reflects these minor changes in the Project Description and in the Population/Housing discussion.

In addition to the changes described above, the attached version of the Initial Study/Negative Declaration corrects a typo in the Energy discussion by correcting the name of the Sacramento Municipal Utility District (SMUD).

The Environmental Coordinator has determined that there are no substantial changes in the project or in the circumstances under which the project is to be undertaken and that the project involves no new significant impacts that were not considered in the prior environmental documents. No further Environmental Documents are required.



Negative Declaration

Pursuant to Title 14, Division 6, Chapter 3, Article 6, Sections 15070 and 15071 of the California Code of Regulations and pursuant to the Procedures for Preparation and Processing of Environmental Documents adopted by the County of Sacramento pursuant to Sacramento County Ordinance No. SCC-116, the Environmental Coordinator of Sacramento County, State of California, does prepare, make, declare, publish, and cause to be filed with the County Clerk of Sacramento County, State of California, this Negative Declaration re: The Project described as follows:

1. **Control Number:** PLNP2019-00027
2. **Title and Short Description of Project:** Sacramento County 2021-2029 Housing Element Update
The proposed Sacramento County 2021-2029 Housing Element Update (hereafter referred to as the Housing Element Update or Project) would amend the Sacramento County General Plan (General Plan) to update the Housing Element.
3. **Assessor's Parcel Number:** Not applicable (NA)
4. **Location of Project:** The project area covers the entire unincorporated portion of the county, which encompasses approximately 496,083 acres or 775 square miles (approximately 79 percent of the entire county). The remaining 21 percent of the county, which is not part of the project area, is comprised of the cities of Sacramento, Citrus Heights, Folsom, Rancho Cordova, Galt, Elk Grove and Isleton
5. **Project Applicant:** Not applicable
6. Said project will not have a significant effect on the environment for the following reasons:
 - a. It will not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.
 - b. It will not have the potential to achieve short-term, to the disadvantage of long-term, environmental goals.
 - c. It will not have impacts, which are individually limited, but cumulatively considerable.
 - d. It will not have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly.
7. As a result thereof, the preparation of an environmental impact report pursuant to the Environmental Quality Act (Division 13 of the Public Resources Code of the State of California) is not required.
8. The attached Initial Study has been prepared by the Sacramento Office of County Planning and Environmental Review in support of this Negative Declaration. Further information may be obtained by contacting the Office Planning and Environmental Review at 827 Seventh Street, Room 225, Sacramento, California, 95814, or phone (916) 874-6141.

[Original Signature on File]

Joelle Inman

Environmental Coordinator
County of Sacramento, State of California

COUNTY OF SACRAMENTO
OFFICE OF PLANNING AND ENVIRONMENTAL REVIEW
INITIAL STUDY

1.1 PROJECT INFORMATION

CONTROL NUMBER: PLNP2019-00027

NAME: Sacramento County 2021-2029 Housing Element Update

Location: The project area covers the entire unincorporated portion of the county, which encompasses approximately 496,083 acres or 775 square miles (approximately 79 percent of the entire county). The remaining 21 percent of the county, which is not part of the project area, is comprised of the cities of Sacramento, Citrus Heights, Folsom, Rancho Cordova, Galt, Elk Grove and Isleton (Figure 1).

ASSESSOR'S PARCEL NUMBER: Not applicable (NA)

OWNER: NA

APPLICANT: County of Sacramento
827 7th Street, Room 225
Sacramento, CA 95814

1.2 PROJECT DESCRIPTION

The proposed Sacramento County 2021-2029 Housing Element Update (hereafter referred to as the Housing Element Update or Project) would amend the Sacramento County General Plan (General Plan) to update the Housing Element.

1.2.1 Project Objectives

The purpose of the Housing Element Update is to address the housing needs of the County and to meet the requirements of State law. Based on the goals of the Project, the following objectives have been established for the purposes of this document:

- Provide adequate supply of land for housing;
- Reduce constraints to housing production;
- Conserve and rehabilitate existing housing and neighborhoods;
- Improve housing opportunities for special needs groups;
- Preserve existing affordable housing stock and provision of affordable housing;
- Promote the efficient use of energy in residences and improve the air quality of Sacramento County; and
- Promote and affirmatively further fair housing opportunities for County residents.

1.2.2 Project Background and History

State law requires each city and county to adopt a general plan containing at least eight elements including a housing element. The housing element, required to be updated regularly, is subject to detailed statutory requirements and mandatory review by the State Department of Housing and Community Development (HCD). This Housing Element Update is an update of the County's previous housing element, which was adopted by the Sacramento County on October 8, 2013.

Housing element law requires local governments to plan adequately to accommodate their existing and projected housing needs, including their share of the regional housing need. Housing element law is the State's primary market-based strategy to increase housing supply, choice, and affordability. The law recognizes that in order for the private for-profit and non-profit sectors to adequately address housing needs and demand, local governments must adopt land use plans and regulatory requirements that provide opportunities for, and do not unduly constrain, housing development.

The timing for jurisdictions to update their housing elements is based on the update schedule of the regional transportation plans (RTPs) by the federally designated metropolitan planning organizations (MPOs). Sacramento County is a member of the Sacramento Area Council of Governments (SACOG), which is the designated MPO for the region. SACOG is required to update its Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) every four years, which puts all member jurisdictions on a schedule to update their housing elements every eight years. The SACOG board adopted the 2020 MTP/SCS and accompanying documents at a special board meeting on November 18, 2019. For SACOG's member jurisdictions, the 6th Cycle Housing Element planning period extends from May 15, 2021 through May 15, 2029.

The Regional Housing Needs Allocation (RHNA) for the planning period is established for each region in the state by the California Department of HCD, as detailed in the Housing Needs Assessment Chapter.

The overall allocation is divided into four income categories:

- Very low-income: up to 50 percent of median countywide income, which also includes extremely low-income at less than 30 percent of median countywide income (Health and Safety Code section 50105);
- Low-income: 50 to 80 percent of median countywide income (Health and Safety Code section 50079.5);
- Moderate-income: 80 to 120 percent of median countywide income (Health and Safety Code section 50093); and
- Above moderate-income: over 120 percent of median countywide income.

Due to unmet needs for housing, the State and Regional housing projections are substantially higher than in prior periods. The 2021-2029 RHNA for unincorporated Sacramento County is 21,272 new units, which is an increase of 7,428 units over the previous 2013-2021 planning period of 13,844 units. As a percentage of the 153,512 units in the SACOG region, Sacramento County is assigned approximately 14 percent of units. The unincorporated Sacramento County allocation is a one-percent increase from its regional share in the prior cycle. And, while the overall number of units allocated to the County is substantially increased

(including the total number of affordable units needed), the share of very low and low income units decreased by 5.1 percent from 38.7 to 33.6 percent from the previous cycle allocation.

1.2.3 Project Description

The Housing Element Update addresses any changes that have occurred since adoption of the current (2013-2021) Housing Element. These changes include updated demographic information, housing needs data, and analysis of the availability of housing sites. The currently adopted Housing Element map of available housing sites identifies sites that could accommodate additional residential units, based on the County's RHNA for the 2021–2029 planning period.

The Housing Element includes the following components, consistent with the requirement of California Government Code Section 65583:

- A review of the previous element's goals, policies, programs, and objectives to ascertain the effectiveness of each of these components, as well as the overall effectiveness of the Housing Element.
- An assessment of housing needs and an inventory of resources and constraints related to the meeting of these needs.
- An analysis and program for preserving assisted housing developments.
- A statement of community goals, quantified objectives, and policies relative to the preservation, improvement, and development of housing.
- A program that sets forth a schedule of actions that the County is taking or intends to take, in implementing the policies set forth in the Housing Element to identify adequate sites to accommodate the housing needs of all economic segments of the community. The program must do all of the following:
 - Identify actions that will be taken to make adequate sites available to accommodate the County's share of the regional housing need, if the need could not be accommodated by the existing inventory of residential sites.
 - Assist in the development of adequate housing to meet the needs of extremely low, very low, low, and moderate income households.
 - Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities.
 - Conserve and improve the condition of the existing affordable housing stock, which may include addressing ways to mitigate the loss of dwelling units demolished by public or private action.
 - Promote and affirmatively further fair housing opportunities and promote housing throughout the County for all persons regardless of race, religion, sex, marital status,

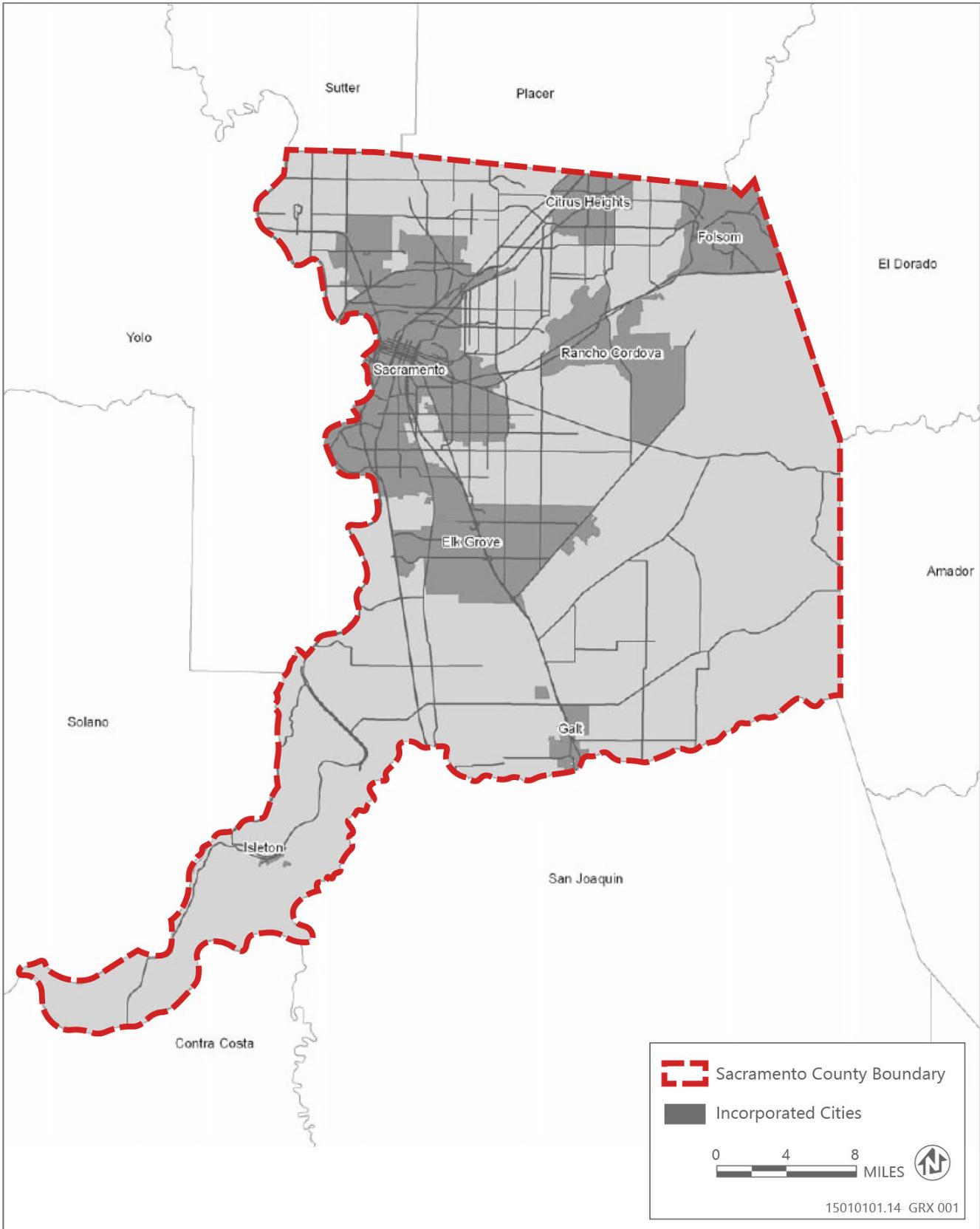
ancestry, national origin, color, familial status, or disability, and other characteristics protected any State and federal fair housing and planning law.

- Preserve assisted housing developments for lower income households.
- Develop a plan that incentivizes and promotes the creation of accessory dwelling units that can be offered at affordable rent for very low, low-, or moderate-income households.
- Include an identification of the agencies and officials responsible for the implementation of the various actions and the means by which consistency will be achieved with other general plan elements and community goals.
- Include a diligent effort by the County to achieve public participation of all economic segments of the community in the development of the housing element, and the program shall describe this effort.
- Include an assessment of fair housing in the County.

California Government Code Sections 65583 and 65583.2 require a parcel-specific inventory of appropriately zoned, available and suitable sites to provide opportunities for the provision of housing to all income segments within the community. The sites inventory addresses how the County can meet projected housing needs. While the inventory analyzes sites available for the construction of new housing at all income levels, particular focus and analysis is done to identify sites available at the lower income categories. The County's evaluation of adequate sites began with a listing of individual sites by General Plan designation and zoning. The suitability analysis demonstrated these sites are currently available and unconstrained to provide development opportunities prior to 2029. To demonstrate the development viability of the sites, the analysis addressed the following:

- Sites have appropriate zoning.
- Development standards do not place an undue impact on projected development capacity and affordability.
- Existing constraints, including any known environmental issues, have been taken into consideration.
- Public services will be available to allow development within the planning period.

The County has sufficient residential capacity to accommodate its RHNA for moderate- and above-moderate income units but has a current shortfall of sites to accommodate its lower-income RHNA. The County only has appropriately-zoned sites to accommodate 4,324 lower-income units, compared to a RHNA of 7,158. Thus, there is a current shortfall of 2,834 units. It should be noted there are parcels that were on the affordable inventory in the 2013 Housing Element that could not be counted in this Housing Element cycle. These parcels will be included in the rezone program (Program A1) and will substantially reduce this shortfall once rezoned.



Source:

Figure 1 Project Location

Sacramento County would accommodate an adequate inventory with the following mechanisms and programs:

- The inventory of vacant residentially and commercially zoned sites available for by right construction of new units by income category including some small and large parcels as documented with additional analysis;
- Inventory of non-vacant but underutilized sites available for by right construction of new units by income category;
- Estimating the construction of Accessory Dwelling Units; and
- Programs to increase the vacant land inventory including:
 - Program A1 of the Proposed Housing Element Update to identify and rezone at least 164 acres of land to allow multifamily residential uses by-right, at a minimum density of 20 units per acre and a maximum density that allows at least 30 units per acre by May 2024.
 - Program A2 of the Proposed Housing Element Update to amend the Zoning Code to ensure that developments in which 20 percent or more of the units are affordable to lower income households are allowed by-right on vacant sites identified in the 4th and 5th cycle Housing Elements and non-vacant sites identified in the 5th Cycle Housing Element, even if the development exceeds 150 units by May 2024.

As directed by the mechanisms and program choices outlined in the Housing Element, Sacramento County will be amending its zoning code to include additional residential capacity. However, the degree to which and locations of these amendments has yet to be determined and will be evaluated as a separate effort and discretionary action under the California Environmental Quality Act (CEQA) once the program has been selected, funded, and drafted. The County will be required to rezone a minimum of 142 acres to meet its RHNA obligation for 2,834 lower income units. However, as indicated in the Program A1 language above, the County has committed to rezoning 164 acres to provide a buffer to accommodate for “no net loss”. In addition, the Zoning Code would be amended to ensure that developments in which 20 percent or more of the units are affordable to lower income households are allowed by-right on vacant sites, even if the development exceeds 150 units. When identifying rezone sites, preference would be given to properties in moderate and high resource areas, pursuant to AB 686. Preference would also be given to sites that are: between 0.85 and 10 acres; along transit routes or major roadway corridors and in proximity to commercial and employment centers; and currently served by both public water and sewer service or ability to hook up to services. Some of the sites that would likely be rezoned by program A1 to accommodate the lower-income RHNA are currently counted in sites inventory as moderate-income sites. As the rezone program is implemented and sites are reclassified as lower-income, the County would also ensure there remains adequate capacity to accommodate the moderate-income RHNA. However, at present the locations of the parcels to be rezoned have yet to be determined and cannot be evaluated but would be appropriately addressed at the time the County considers adoption of amendments to its zoning code.

The Housing Element Update does not propose new development that would result in physical changes to the environment. No new housing sites are proposed as a part of this Housing

Element Update beyond those already designated in the County General Plan and evaluated for potential environmental impacts in the County General Plan EIR. No changes to existing zoning are proposed, and the location of development will continue to be guided by the County General Plan land use map and zoning code.

1.2.4 Project Approvals

Implementation of the Housing Element Update would require the following discretionary actions by the County Board of Supervisors:

- Adoption of the Initial Study/Negative Declaration; and
- Adoption of the Housing Element for the County of Sacramento through the General Plan Amendment process.

In addition to adoption by the County Board of Supervisors, the Housing Element Update will be submitted for review and approval by the California Department of Housing and Community Development.

1.3 ENVIRONMENTAL SETTING

Sacramento County lies within the Central Valley of California, and is the County seat of the state capitol of Sacramento. The County has a history as a center of government, trade, transportation and agriculture, and as a result, the County is a major transportation hub. Interstates 80 and 5; U.S. Highway 50 (US 50); and State Routes (SR) 99, 16 and 160 all extend from the outer edges of the County and converge in downtown Sacramento. Similarly, all of the rail lines in the County converge in Sacramento at the site of the old Sacramento Rail Yard. Airports within the County include Sacramento International, Sacramento Executive, Mather Air Force Base, McClellan Air Force Base, and other smaller airports.

The County is divided into 14 Community Planning Advisory Councils (CPAC) and seven cities. Most of these communities in the unincorporated County are in the urbanized core in the western, northwestern or northern portion of the County. The southwestern, eastern and southern portions of the County are more agricultural and rural residential. Many portions of the developed County are within the historic floodplains of the three major rivers (Sacramento, American, and Cosumnes Rivers) and are protected by a system of levees.

1.4 ENVIRONMENTAL EFFECTS

Appendix G of the CEQA provides guidance for assessing the significance of potential environmental impacts. Based on this guidance, Sacramento County has developed an Initial Study Checklist (located at the end of this report). The Checklist identifies a range of potential significant effects by topical area. The topical discussions that follow are provided only when additional analysis beyond the Checklist is warranted.

1.4.1 Background

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is subject to detailed statutory requirements and mandatory review by the California Department of Housing and Community Development (HCD). This Housing Element Update is an update of the County's previous housing element, which was adopted by Sacramento County on October 8, 2013.

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TIERING AND SIGNIFICANCE DETERMINATIONS

This Initial Study is relying on the tiering provisions of CEQA, which are laid out in CEQA Guidelines Section 15152. Tiering refers to using the analysis contained in a broader EIR for subsequent, more specific projects that usually follow. In cases where an EIR has been prepared and certified for a more general project, the environmental document for any subsequent, consistent project should limit the analysis to any effects which had not previously been analyzed or which could be further reduced by new mitigation or avoidance measures. As part of this process, the environmental document must incorporate by reference the prior analysis, which includes summarizing any relevant analysis from the EIR being used for tiering. On these grounds, the key issue being examined in this Initial Study will be whether or not the proposed Project increases impacts beyond those examined within the General Plan EIR. If it does not, then the impacts of this Project are found to be less than significant.

The Housing Element is part of the Sacramento County General Plan. The 2030 Sacramento County General Plan was adopted on November 9, 2011, and the Environmental Impact Report (EIR) was prepared for the General Plan. This IS/ND tiers from the General Plan EIR, thus, it is incorporated by reference. It is available for review at 827 7th Street, Room 220, Sacramento, CA 95814 (State Clearinghouse Number 2007082086) and at <https://planning.saccounty.net/PlansandProjectsIn-Progress/Pages/GeneralPlan.aspx>. Relevant discussions within the General Plan EIR are summarized throughout this document.

1.4.2 Land Use

This section supplements the Initial Study Checklist by analyzing if the Project would:

- Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?
- Physically disrupt or divide an established community?

ENVIRONMENTAL SETTING

Sacramento County is located in the southern portions of the Sacramento Valley in the Central Valley region. It is bounded by the Sacramento River to the west and extends approximately 40 miles east to the foothills of the Sierra Nevada mountains. Several major freeways intersect the County, including north and southbound State Route (SR) 99, east and westbound US (United States Highway)-50, east and westbound US-80, and east and westbound SR-16.

Existing land uses in the county range from small single-family residences to commercial, agricultural, industrial, recreational, and conservation uses. Developed areas are generally located around and between the incorporated cities, in the northern areas of the county. The southern portions of the county consist primarily of open space uses including agriculture and recreation resources.

DISCUSSION

The General Plan EIR states that impacts related to plan compatibility were determined to be significant and unavoidable (Sacramento County: pp 3-22 – 3-35); and, impacts related to land

use policy compatibility were determined to be less-than-significant after implementation of mitigation measures (Sacramento County: pp 3-35 – 3-44). The General Plan EIR stated there would be less-than-significant impacts related to division or disruption of an established community (Sacramento County: p 3-47).

Establishing policies that increase single-family or multi-family densities is consistent with land use plans and policies which are intended to avoid significant effects. Including such policies is often a key component of “smart growth” principles, because developing at increased densities is a means of reducing the ultimate regional growth footprint.

The Project includes revisions to housing policy and programs and does not propose new development that would physically divide an established community or conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

No new housing sites are proposed as a part of this Housing Element Update beyond those already designated in the County General Plan and evaluated for potential environmental impacts in the County General Plan EIR. No changes to existing zoning are proposed, and the location of development will continue to be guided by the County General Plan land use map and zoning code. The Housing Element Update would be consistent with the existing General Plan as required by State law. Future housing projects will continue to be reviewed through the County’s entitlement process and CEQA to ensure consistency with local, State, and federal regulations and all General Plan goals and policies intended to avoid dividing established communities, ensure new development remains interconnected with established communities, and ensure new development does not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The Project does not result in any new significant impacts not analyzed within the General Plan EIR, nor does it worsen any impacts; impacts due to the Project are **less than significant** related to land use and planning.

1.4.3 Population/Housing

This section supplements the Initial Study Checklist by analyzing if the Project would:

- Induce substantial unplanned population growth in an area either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of infrastructure)?
- Displace substantial amounts of existing people or housing, necessitating the construction of replacement housing elsewhere?

ENVIRONMENTAL SETTING

The total population of Sacramento County in January 2020 was 1,555,365 people, 961,564 of which resided in the incorporated portion of the County. In terms of housing, 579,115 housing units are located within Sacramento County (as a whole), 355,409 of which are located in the unincorporated area of the County (i.e., project area) (California Department of Finance [DOF] 2021).

The 2013-2021 Housing Element of the County General plan estimated that the population of unincorporated Sacramento County will be 696,590 by 2035, a 20.1 percent growth increase from 2020-2035 (Sacramento County 2013).

DISCUSSION

The General Plan EIR indicated that there would be less-than-significant impacts related to displacement of housing (Sacramento County 2010: 3-60 – 3-61).

The Project includes revisions to housing policies and programs, and does not propose new development that could induce substantial unplanned population growth or displace existing people or housing units. The 2021-2029 RHNA for unincorporated Sacramento County is 21,272 new units, which is an increase of 7,428 units over the previous 2013-2021 planning period of 13,844 units. Total growth assumed within the adopted General Plan was 99,700 units, which would not increase due to RHNA requirements associated with this Housing Element Update. However, as discussed in the Project Description (above), the County only has appropriately-zoned sites to accommodate 4,324 lower-income units, compared to a lower-income RHNA obligation of 7,158. Thus, there is a currently projected shortfall of 2,834 units. However, Sacramento County would, through implementation of the mechanisms and programs outlined in the Housing Element (see the Project Description, above, for more information), implement specific actions to guide the County and achieve the RHNA housing need within the County. This would allow for future accommodation of the projected affordable housing demand within the County, thereby avoiding the potential for induced population growth elsewhere in the region.

As directed by the mechanisms and program choices outlined in the Housing Element, Sacramento County would, as a later action, amend its zoning code and rezone potential parcels within the County to allow for additional residential capacity. However, the increase in residential capacity and specific locations of these amendments has yet to be determined and will be evaluated as a separate effort and discretionary action under CEQA once the program has been selected, funded, and drafted. Because the potential impacts associated with these amendments are too speculative for meaningful evaluation, specific details cannot be discussed or evaluated further, consistent with CEQA requirements (refer to CEQA Guidelines Section 15145).

As discussed above, no new housing sites are proposed as a part of this Housing Element Update beyond those already designated in the County General Plan and evaluated for potential environmental impacts in the County General Plan EIR. Potential new housing sites in Master Plan communities, such as NewBridge, Cordova Hills, and Mather South, are evaluated in their respective environmental documents and are not evaluated in this document. No changes to existing zoning are proposed, and the location of development will continue to be guided by the County General Plan land use map and zoning code. The County General Plan EIR considered the population and housing projections in the 2013–2021 Housing Element in its analysis of physical impacts associated with future development in the County. The Housing Element Update would not change the population or housing projections identified by the 2013–2021 Housing Element; therefore, the Housing Element Update would not induce unplanned population and housing growth that is not already contemplated in the County General Plan. The Project does not result in any new significant impacts not analyzed within the General Plan EIR, nor does it worsen any impacts; impacts due to the Project are **less than significant** related to population and housing.

1.4.4 Agricultural Resources

This section supplements the Initial Study Checklist by analyzing if the Project would:

- Convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance or areas containing prime soils to uses not conducive to agricultural production?
- Conflict with any existing Williamson Act contract?
- Introduce incompatible uses in the vicinity of existing agricultural uses?

ENVIRONMENTAL SETTING

The California Department of Conservation (DOC) classifies farmlands based on a system that combines technical soil ratings and current land use, as part of the Farmland Mapping and Monitoring Program (FMMP). The categories of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland are collectively referred to under CEQA as “Important Farmland.”, Areas classified as Important Farmland are located in the southern and northwestern portions of the County (DOC 2021) Lands subject to Williamson Act contracts are located in the southern and northwestern portions of the County (Sacramento County 2012).

Major crops grown in the County include wine grapes, milk, flowers, pears and other fruit, hay and alfalfa, rice, corn, and nuts including almonds and walnuts (Sacramento County 2019).

No lands zoned as forestland, timberland, or Timberland Production Zones were identified within unincorporated areas of the County (Sacramento County 2013).

DISCUSSION

The General Plan EIR indicated that there would be significant and unavoidable impacts related to conversion of or conflict with farmland (Sacramento County 2010: 3-47 – 3-60).

The Project includes revisions to existing housing policies and programs and does not propose new development that would convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance; conflict with existing zoning for agricultural use; or involve other changes in the environment that could cause the conversion of agricultural land to non-agricultural uses.

No new housing sites are proposed as a part of the Housing Element Update beyond those already designated in the County General Plan and evaluated for potential environmental impacts in the General Plan EIR. No changes to existing zoning are proposed, and the location of development will continue to be guided by the County General Plan land use map and zoning code. Future housing projects will continue to be reviewed through the County’s entitlement process and CEQA to ensure consistency with all relevant County General Plan goals and policies related to the preservation of agricultural resources within the County. The Project does not result in any new significant impacts not analyzed within the General Plan EIR, nor does it worsen any impacts; impacts due to the Project are **less than significant** related to agricultural resources.

1.4.5 Aesthetics

This section supplements the Initial Study Checklist by analyzing if the Project would:

- Substantially alter existing viewsheds such as scenic highways, corridors, or vistas?
- In non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings?
- If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?
- Create a new source of substantial light, glare, or shadow that would result in safety hazards or adversely affect day or nighttime views in the area?

ENVIRONMENTAL SETTING

Sacramento County lies near the center of California's Central Valley, at the southern end of the Sacramento Valley. Aesthetic views within the valley region are generally characterized by broad sweeping panoramas of flat agricultural lands and open space dotted with trees, divided by numerous rivers and creeks, and populated with scattered towns and cities. To the east, the Sierra Nevada and their foothills form a background, and the Coast Range provides a backdrop on the western horizon. In general, the dominant visual characteristics within the unincorporated area are the open sections of the valley floor, urbanized land uses, agricultural land uses, rivers and creeks, and trees. Because the unincorporated area consists of relatively flat terrain, views of these resources are available from roadways throughout the area including US 50, State Route 99 (SR 99), SR 16, SR 160/River Road, Grant Line Road, and Scott Road. Oak trees, vernal pools, streams, creeks, the Delta region and the historic structures and rural communities such as Locke and Sloughouse are among the County's visual heritage that many residents value as part of their quality of life. Distant views of the Sierra Nevada, the Coast Range, Mount Diablo, and the Sutter Buttes can be visible under clear conditions and are also considered part of the County's visual heritage.

The Scenic Highways Element of the County General Plan designates scenic corridors within the County. These corridors include River Road, Isleton Road, Garden Highway, Scott Road (from White Rock Road south to Latrobe Road), Latrobe Road, Michigan Bar Road, and Twin Cities Road (from State Route 160 east to Highway 99). SR160/River Road extends from the County border with Contra Costa County to the southern limit of the City of Sacramento and is a state designated scenic highway (Caltrans 2015). River Road meanders through the historic Delta agricultural areas and small towns along the Sacramento River. Scenic views along this corridor include the river, agricultural fields, and orchards, patches of riparian forest, several historic homes, and buildings (Sacramento County 2010).

DISCUSSION

The General Plan EIR indicates that there would be significant and unavoidable impacts on scenic resources and visual character or quality of an area associated with buildout of planned communities and new growth areas, and less-than-significant impacts related to infill and commercial corridor development. In addition, there would be significant and unavoidable impacts related to light and glare (Sacramento County 2010: 16-19 – 16-21).

The Project includes revisions to housing policy and programs and as a result does not propose new development that would result in physical changes affecting scenic vistas, visual character, and light and glare. State and County routes identified in the Environmental Setting Section above would not be affected by the Project.

No new housing sites are proposed as a part of this Housing Element Update beyond those already designated in the County General Plan and evaluated for potential environmental impacts in the County General Plan EIR. No changes to existing zoning are proposed, and the location of development will continue to be guided by the County General Plan land use map and zoning code. Future housing projects will continue to be reviewed through the County's entitlement process and CEQA to ensure consistency with all relevant federal and State policies and consistency with all relevant County General Plan goals and policies related to aesthetic resources. Future development of housing within the County will also be evaluated to consider the potential for degradation of existing visual character or quality of public views of the site and its surroundings. The Project does not result in any new significant impacts not analyzed within the General Plan EIR, nor does it worsen any impacts; impacts due to the Project are **less than significant**. related to aesthetics.

1.4.6 Airports

This section supplements the Initial Study Checklist by analyzing if the Project would:

- Result in a safety hazard for people residing or working in the vicinity of an airport/airstrip?
- Expose people residing or working in the project area to aircraft noise levels in excess of applicable standards?
- Result in a substantial adverse effect upon the safe and efficient use of navigable airspace by aircraft?
- Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

ENVIRONMENTAL SETTING

There are four major airports and a total of seven public airports located in the County. Sacramento International, Mather Field, and McClellan Air Park, all have adopted Comprehensive Land Use Plans (CLUPs) and/or Airport Policy Areas which address noise contours for each respective facility. In addition, there are many small private airstrips used for personal agricultural, and other uses (Sacramento County 2010).

DISCUSSION

The General Plan EIR indicated that there would be less-than-significant impacts related to airport safety zone compatibility (Sacramento County pp 3-61 – 3-63). In addition, compliance with the existing airport land use plans would ensure that people residing or working in the vicinity of County airports will not be exposed to excessive airport noise (Sacramento County 2010: 10-18 – 10-19).

The Project includes revisions to housing policy and programs, and does not propose new development that could affect airports.

No new housing sites are proposed as a part of this Housing Element Update beyond those already designated in the County General Plan and evaluated for potential airport-related impacts in the County General Plan EIR. No changes to existing zoning are proposed, and the location of development will continue to be guided by the County General Plan land use map and zoning code. Future housing projects will continue to be reviewed through the County's entitlement process and CEQA to ensure consistency with all relevant federal and State policies and consistency with all relevant County General Plan goals and policies related to aesthetic resources. Future development will also be evaluated to consider the potential to affect safety noise levels, navigable airspace, and air traffic patterns associated with airports and airstrips. The Project does not result in any new significant impacts not analyzed within the General Plan EIR, nor does it worsen any impacts; impacts due to the Project are **less than significant** related to airports.

1.4.7 Public Services

This section supplements the Initial Study Checklist by analyzing if the Project would:

- Have an adequate water supply for full buildout of the project?
- Have adequate wastewater treatment and disposal facilities for full buildout of the project?
- Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?
- Result in substantial adverse physical impacts associated with the construction of new water supply or wastewater treatment and disposal facilities or expansion of existing facilities?
- Result in substantial adverse physical impacts associated with the provision of storm water drainage facilities?
- Result in substantial adverse physical impacts associated with the provision of electric or natural gas service?
- Result in substantial adverse physical impacts associated with the provision of emergency services?
- Result in substantial adverse physical impacts associated with the provision of public school services?
- Result in substantial adverse physical impacts associated with the provision of park and recreation services?

ENVIRONMENTAL SETTING

There are a total of 28 water purveyors providing water services to County residents, including within City boundaries. Sources of water within the region include groundwater from the North

Area Groundwater Basin, and water from the Sacramento River (Sacramento County 2010; 18-10).

Wastewater conveyance and treatment is provided primarily by the Sacramento Regional County Sanitation District (Regional San). Regional San provides wastewater conveyance and treatment services to County residents, Regional San operates 177 miles of interceptors (pipe systems), and water is treated at the Sacramento Regional Wastewater Treatment Plant near Elk Grove (Sac County 2021).

The County operates one landfill, Keifer Landfill, which is located near the community of Sloughhouse. Keifer Landfill has a remaining capacity of approximately 117,400,000 cubic yards and is expected to cease operations in 2064 (Calrecycle 2021).

Electricity within the County is supplied and provided mainly by the Sacramento Metropolitan Utility District (SMUD), and Pacific Gas and Electric (PG&E). Telecommunications services to County residents are provided by AT&T and Comcast.

Fire service is provided in the County of Sacramento by the Cities of Sacramento and Folsom, and eleven fire districts. The Natomas Fire Protection District is governed by the Sacramento County Board of Supervisors. The remaining districts (including the Elk Grove Community Services District) are independent special districts and are governed by elected Boards of Directors. Portions of the foothill areas are also protected by the State Division of Forestry, although it provides no structural protection. The unincorporated community of Freeport and a portion of its surrounding area are not located within any organized fire protection agency (Sacramento County 2010).

The following 11 fire districts serve the unincorporated areas:

- Sacramento Metropolitan Fire District
- Cosumnes Community Services District
- Delta
- Herald
- Fruitridge
- Wilton
- Pacific
- Natomas
- River Delta
- Walnut Grove
- Courtland. (Sacramento County 2010).

Unincorporated Sacramento County is served by the Sacramento County Sheriff's Department, which provides police protection services to County residents.

The entire County, including existing cities within the County, is served by 11 different K-12 public school districts. This list includes primary, secondary, and high school services provided to county residents (Sacramento County Office of Education 2021).

In Sacramento County, recreation services are provided by five different types of government entities: dependent park districts, independent park districts, County service areas, cities, and the County regional park system. There are thirteen park districts, two County service areas, four city parks departments, and one County regional park system (Sacramento County 2010). The primary library system serving County residents is the Sacramento Public Library. The Sacramento Public Library Authority is governed by a Joint Exercise of Powers Agreement between the County of Sacramento and the Cities of Citrus Heights, Galt, Isleton, Elk Grove, Rancho Cordova, and Sacramento. The City of Folsom operates the Folsom Public Library.

DISCUSSION

Water Supply

The General Plan EIR concluded that water purveyors would likely need additional conveyance infrastructure to serve development in newly urbanizing areas. Most Sacramento County water purveyors had sufficient supply to serve future development, with the exception of the California-American Water Company (CalAm), Florin County Water District, Tokay Park Water Company, and Sacramento County Water Agency Zone 40. In addition, CalAm, Tokay Park Water Company, and the Florin County Water District all have enough water rights and infrastructure to provide the needed water, but have contaminated wells that cannot be used at this time. The Sacramento County Water Agency had enough supply at the time of the EIR analysis to serve all of the development which could be expected to result from the increased units associated with the Housing Element policies, but not enough to serve that development in addition to other cumulative development. The EIR analysis included a cumulative assessment of water needs, and identified the various methods by which additional supply could be obtained. Mitigation Measure WS-1 required the addition of General Plan policies that would prohibit approval of new developments or building permits if sufficient water supply is not available (Sacramento County 2010: Chapter 6).

The Project includes revisions to housing policy and programs, and does not propose new development that could result in new or physically altered public services facilities or provision of utilities and service systems.

No new housing sites are proposed as a part of this Housing Element Update beyond those already designated in the County General Plan and evaluated for potential public services impacts in the County General Plan EIR. No changes to existing zoning are proposed, and the location of development will continue to be guided by the County General Plan land use map and zoning code. The County General Plan EIR considered the increased demand public services required to serve the population projected in the 2013-2021 Housing Element. The location of new housing units or changes to density associated with Programs A1 and/or A2 of the Housing Element Update would be considered based on consistency with County General Plan policies, which preclude development within the County where adequate water supplies are not available (per adopted Mitigation Measure WS-1 in the General Plan EIR). Future

housing projects will continue to be reviewed through the County's entitlement process and CEQA to ensure that public services are provided consistent with all County General Plan goals and policies and to ensure acceptable service ratios, response times, and provision of utilities and service systems. The Project does not result in any new significant impacts not analyzed within the General Plan EIR, nor does it worsen any impacts; impacts due to the Project are **less than significant** related to public services.

Sewer Service

The General Plan EIR indicated that the existing flows to the Sacramento Regional Wastewater Treatment Plant (SRWTP) were 141 million gallons per day (mgd) and that buildout of the General Plan would result in flows of 193.9 mgd, which would exceed the permitted capacity at Regional San (Sacramento County 2010: 5-13 – 5-18). While significant impacts could be reduced to a less-than-significant level for flows attributed to the General Plan, regional flows were estimated to reach 292.5 mgd, and available mitigation measures would not reduce impacts to a less-than-significant level (Sacramento County 2010: 5-18 – 5-20).

However, since release of the General Plan EIR, a substantial upgrade to SRWTP was approved, and is currently under way. The upgrade, known as the EchoWater Project, must be built by 2023 to meet new water quality requirements that were issued by the Central Valley RWQCB as part of Regional San's 2010 NPDES permit. In addition, flows to the SRWTP have decreased as a result of water conservation efforts over the last 10 years and adequate capacity for wastewater is anticipated well into the future. Flows in 2014 were approximately 141 million gallons per day (mgd), compared to the current permitted capacity of 181 mgd (Regional San 2014). According to the most recent Regional San State of the District report, the amount of wastewater treated has reduced to 115 mgd (Regional San 2019). It is not anticipated that Regional San will need to consider further improvements to the SRWTP until after 2050. The SRWTP has been master planned to accommodate up to 350 mgd ADWF of treatment capacity (Regional San 2014).

The Project includes revisions to housing policy and programs, and does not propose new development that could result in new or physically altered public services facilities or provision of utilities and service systems.

No new housing sites are proposed as a part of this Housing Element Update beyond those already designated in the County General Plan and evaluated for potential public services impacts in the County General Plan EIR. No changes to existing zoning are proposed, and the location of development will continue to be guided by the County General Plan land use map and zoning code. The County General Plan EIR considered the increased demand public services required to serve the population projected in the 2013-2021 Housing Element. The Housing Element Update would not change the population or housing projections identified by the 2013–2021 Housing Element; therefore, the Housing Element Update would not have any impacts on public services, such as fire, police, schools, parks, and other services, that are not already contemplated in the County General Plan (and addressed in the County's existing General Plan EIR). Future housing projects will continue to be reviewed through the County's entitlement process and CEQA to ensure that public services are provided consistent with all City General Plan goals and policies and that acceptable service ratios, response times, and provision of utilities and service systems. The Project does not result in any new significant

impacts not analyzed within the General Plan EIR, nor does it worsen any impacts; impacts due to the Project are **less than significant** related to public services.

Public Services

The General Plan EIR indicated there would be less-than-significant impacts related to construction of new schools, libraries, Sheriff's facilities, fire stations, energy transmission lines, energy transfer stations, and parks (Sacramento County 2010: 4-20) The General Plan EIR also indicated there would be less-than-significant impacts related increased demand on to solid waste disposal (Sacramento County 2010: 4-21 – 4-22), public school facilities (Sacramento County 2010: 4-22 – 4-24), library services (Sacramento County 2010: 4-24 – 4-25), law enforcement services (Sacramento County 2010: 4-26 – 4-27), fire protection and emergency services (Sacramento County 2010: 4-27 – 4-28) energy facilities (Sacramento County 2010: 4-28 – 4-29). In addition, impacts related to parks and recreation facilities would be less-than-significant after implementation of mitigation measures (Sacramento County 2010: 4-30 – 4-31).

The Project includes revisions to housing policy and programs, and does not propose new development that could result in new or physically altered public services facilities or provision of utilities and service systems.

No new housing sites are proposed as a part of this Housing Element Update beyond those already designated in the County General Plan and evaluated for potential public services impacts in the County General Plan EIR. No changes to existing zoning are proposed, and the location of development will continue to be guided by the County General Plan land use map and zoning code. The County General Plan EIR considered the increased demand public services required to serve the population projected in the 2013-2021 Housing Element. The Housing Element Update would not change the population or housing projections identified by the 2013–2021 Housing Element; therefore, the Housing Element Update would not have any impacts on public services, such as fire, police, schools, parks, and other services, that are not already contemplated in the County General Plan (and addressed in the County's existing General Plan EIR). Future housing projects will continue to be reviewed through the County's entitlement process and CEQA to ensure that public services are provided consistent with all County General Plan goals and policies and to ensure acceptable service ratios, response times, and provision of utilities and service systems. The Project does not result in any new significant impacts not analyzed within the General Plan EIR, nor does it worsen any impacts; impacts due to the Project are **less than significant** related to public services.

1.4.8 Transportation

This section supplements the Initial Study Checklist by analyzing if the Project would:

- Conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) – measuring transportation impacts individually or cumulatively, using a vehicles miles traveled standard established by the County?
- Result in a substantial adverse impact to access and/or circulation?
- Result in a substantial adverse impact to public safety on area roadways?

- Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

ENVIRONMENTAL SETTING

The County's roadway network consists of a network of arterial, collector, local streets, and freeways. Several major freeways intersect the County, including north and southbound State Route (SR) 99, east and westbound US (United States Highway)-50, east and westbound US-80, and east and westbound SR-16.

The primary transit provider in the region is Sacramento Regional Transport, which operates bus and light rail serving city centers and surrounding urban areas. Rural areas of eastern and southern Sacramento County are served by South County Transit, Delta Breeze, and Amador Transit. Passenger rail in the County is also provided by Amtrak and Caltrain.

On October 6, 2020, the Board of Supervisors adopted revised significance thresholds for CEQA transportation analysis using vehicle miles traveled (VMT), in compliance with SB 743. In conjunction with the Office of Planning and Environmental Review, the Department of Transportation has updated the Transportation Analysis Guidelines (TAG) to provide guidance on VMT analysis. The TAG outlines screening criteria, by which projects may be exempted from VMT analysis. If screening criteria are not met, a proponent must analyze the project's VMT, using methodologies outlined in the TAG. If a project is found to have a significant impact, VMT-reducing mitigation will be required.

The Department of Transportation continues to require traffic studies, now called Local Transportation Analysis (LTA), for certain projects. Generally, this includes projects generating 100 or more new a.m. or p.m. peak hour vehicle trip-ends, projects generating 1,000 or more daily vehicle trip-ends, or projects which are likely to cause or substantially contribute to traffic congestion or safety issues. The purpose of the LTA is to ensure compliance with the multimodal policies in General Plan, including level of service (LOS), safety, transit service, and a comprehensive, safe, convenient, and accessible bicycle and pedestrian system. The project will be conditioned to provide any improvements recommended in the LTA in order to comply with General Plan policies. Depending on the project, the Department of Transportation may require additional analysis, including, but not limited to: turn pocket queuing, drive-thru queuing, traffic signal warrants, traffic safety, neighborhood cut-through traffic, truck impacts, access control, and phasing analysis. Requirements and guidance for preparing an LTA are included in the TAG.

SACRAMENTO COUNTY'S ADOPTED VMT THRESHOLDS FOR RESIDENTIAL PROJECTS IS 85 PERCENT OR LESS OF THE REGIONAL AVERAGE, WHICH IS LESS THAN OR EQUAL TO 15.0 VMT PER CAPITA.DISCUSSION

The General Plan EIR indicated that the Mixed Use Alternative would cause many of the roadways serving those areas to degrade to unacceptable LOS. In particular, increasing densities would affect Antelope Road, Easton Valley Parkway, Elk Grove-Florin Road, Elkhorn Boulevard, Fair Oaks Boulevard, Greenback Lane, Hazel Avenue, Hillsdale Boulevard, Madison Avenue, Stockton Boulevard, and Walerga Road more heavily than if densities were not increased. The Mixed Use Alternative was also found to have significant impacts to

roadways within other jurisdictions, such as within the City of Sacramento. Significant impacts to the freeway system were also disclosed, including to I-5, US 50, Business 80, I-80, and SR 99. Ultimately, it was found that the Mixed Use Alternative had the greatest potential to reduce roadway impacts on a regional basis, but at the cost of increasing roadway impacts in localized areas, however, impacts were found to be significant and unavoidable (Sacramento County 2010: 9-69 – 9-93).

The Project includes revisions to housing policies and programs, and does not propose new development that would result in conflicts with policies related to transit, roadway, bicycle, and pedestrian facilities; hazardous design features; or inadequate emergency access. The Project would not conflict with existing policies or ordinances.

No new housing sites are proposed as a part of this Housing Element Update beyond those already designated in the County General Plan and evaluated for potential transportation impacts in the County General Plan EIR. No changes to existing zoning are proposed, and the location of development will continue to be guided by the County General Plan land use map and zoning code. Future housing projects will continue to be reviewed through the County's entitlement process and CEQA to ensure that future housing projects are consistent with all relevant transportation-related City General Plan goals and policies, including the County's policies related to managing vehicular travel demand. In addition, as noted above in Section 1.2.2, "Project Description," while no new housing sites have been identified, preference would be given to parcels that are located along transit routes or major roadway corridors and in proximity to commercial and employment centers. Because the County is generally urbanized and has an extensive public transit system, implementation of zoning programs that would increase density in areas along transit routes are anticipated to reduce overall per capita VMT by making the use of public transit more readily accessible. This is considered to be consistent with guidance from the Governor's Office of Planning and Research (OPR), which states that adding affordable housing to infill locations generally improves jobs-housing match, in turn shortening commutes and reducing VMT. Furthermore, a project would reduce VMT through developing in areas near transit and increasing density and mix of uses (OPR 2018). Thus, implementation of the potential zoning programs that would increase density and meet the RHNA requirements is anticipated to reduce overall VMT. The Project does not result in any new significant impacts not analyzed within the General Plan EIR, nor does it worsen any impacts; impacts due to the Project are **less than significant** related to transportation.

1.4.9 Air Quality

This section supplements the Initial Study Checklist by analyzing if the Project would:

- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?
- Expose sensitive receptors to pollutant concentrations in excess of standards?
- Create objectionable odors affecting a substantial number of people?

ENVIRONMENTAL SETTING

Sacramento County is located within the Sacramento Valley Air Basin (SVAB). The SVAB is bounded on the north by the North East Plateau Air Basin, on the south by the San Joaquin Valley Air Basin, on the east by the southern portion of the Cascade Range and the northern portion of the Sierra Nevada, and on the west by the Coast Ranges. Sacramento County is currently designated as nonattainment for both the federal and state ozone standards, the federal PM_{2.5} standard, and the state PM₁₀ standard. The region is designated as in attainment or being unclassifiable for all other NAAQS and CAAQS (CARB 2019).

SMAQMD is part of the Sacramento Regional 2008 National Ambient Air Quality Standards 8-Hour Ozone Attainment and Reasonable Further Progress Plan. The 8-Hour Ozone Plan is intended to encourage infill development and growth patterns that promote alternatives to the automobile.

DISCUSSION

The General Plan EIR concluded that impacts related to construction and operational air quality would be significant and unavoidable, due to the overall cumulative scale of development that would occur. It was also found that development near the Roseville Rail Yard would have the potential to expose sensitive receptors to substantial health risks, and impacts were found to be significant and unavoidable. The EIR analyses also found that the General Plan would not cause exposure of sensitive receptors to substantial concentrations of carbon monoxide, cause elevated health risks associated with the Sacramento County International Airport, expose sensitive receptors to elevated health risks associated with diesel particulates, or result in substantial impacts related to naturally occurring asbestos exposure (Sacramento County 2010: 11-74 – 11-102).

The Project includes revisions to housing policies and programs and does not propose new development that would result in physical changes that could conflict with an applicable air quality plan, increase criteria air pollutants, expose sensitive receptors to substantial pollutant concentrations, or result in other emissions adversely affecting a substantial number of people.

No new housing sites are proposed as a part of this Housing Element Update beyond those already designated in the County General Plan and evaluated for potential air quality impacts in the County General Plan EIR. No changes to existing zoning are proposed, and the location of development will continue to be guided by the County General Plan land use map and zoning code. Future housing projects will continue to be reviewed through the County entitlement process and CEQA to ensure consistency with local, State, and federal air quality standards and that future housing projects are consistent with all relevant County General Plan goals and policies, including those that would avoid locating housing near sources of substantial pollutant concentrations. The Project does not result in any new significant impacts not analyzed within the General Plan EIR, nor does it worsen any impacts; impacts due to the Project are ***less than significant*** pertaining to air quality.

1.4.10 Noise

This section supplements the Initial Study Checklist by analyzing if the Project would:

- Result in generation of a temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established by the local general plan, noise ordinance or applicable standards of other agencies?
- Result in a substantial temporary increase in ambient noise levels in the project vicinity?
- Generate excessive groundborne vibration or groundborne noise levels?

ENVIRONMENTAL SETTING

The primary sources of noise in Sacramento County are from transportation, including car, aircraft, and train traffic. The primary noise sources for cars and other vehicles are primarily major roadways including State Route (SR) 99, US (United States Highway)-50, US-80, SR-16. In addition, there are also major and minor stationary sources in the County, such as aggregate mining and manufacturing facilities. Parks and schools are considered sensitive receptors, but these facilities may also generate noise, such as during outdoor sports events (Sacramento County 2010).

DISCUSSION

The General Plan EIR identified less-than-significant impacts, with adopted mitigation, to long-term noise (Sacramento County 2010: 10-15 – 10-17). Impacts related to increased transportation related noise would be significant and unavoidable (Sacramento County 2010: 10-22 – 10-24).

The Project includes revisions to housing policies and programs, and does not propose new development that would result in physical changes that generate temporary or permanent increase in ambient noise levels or excessive groundborne vibrations.

No new housing sites are proposed as a part of this Housing Element Update beyond those already designated in the County General Plan and evaluated for potential noise impacts in the County General Plan EIR. No changes to existing zoning are proposed, and the location of development will continue to be guided by the County General Plan land use map and zoning code. Future housing projects will continue to be reviewed through the County's entitlement process and CEQA to ensure that residents are not exposed to unacceptable noise and vibration levels, and that the projects are consistent with all General Plan goals and policies. The Project does not result in any new significant impacts not analyzed within the General Plan EIR, nor does it worsen any impacts; impacts due to the Project are ***less than significant*** related to noise.

1.4.11 Hydrology and Water Quality

This section supplements the Initial Study Checklist by analyzing if the Project would:

- Substantially deplete groundwater supplies or substantially interfere with groundwater recharge?
- Substantially alter the existing drainage pattern of the project area and/or increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?

- Develop within a 100-year floodplain as mapped on a federal Flood Insurance Rate Map or within a local flood hazard area?
- Place structures that would impede or redirect flood flows within a 100-year floodplain?
- Develop in an area that is subject to 200 year urban levels of flood protection (ULOP)?
- Expose people or structures to a substantial risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?
- Create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems?
- Create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality?

ENVIRONMENTAL SETTING

The Sacramento River Basin encompasses about 26,500 square miles and is bounded by the Sierra Nevada Mountains to the east, the Coast Ranges to the west, the Cascade Range and Trinity Mountains to the north and the Delta Central Sierra area to the south. Within the Sacramento River Basin are sub-basins or smaller watersheds that drain to the tributaries of the Sacramento River. The American River watershed is a sub-basin of the Sacramento River watershed. The American River originates in the Tahoe and Eldorado National Forests and flows into the Folsom Lake reservoir, which holds approximately 1 million acre feet of water. The Cosumnes and the Mokelumne Rivers are not tributaries of the Sacramento River; they flow into the San Joaquin River and are typically considered part of a separate watershed. The majority of Sacramento County is within the Sacramento River basin; however, southwestern Sacramento County contains Delta waterways, which interconnect the Sacramento, San Joaquin and Mokelumne Rivers.

The Delta contains vital water resources and a complex hydrologic system of islands and channels. Historically, the Delta was a vast tidal marsh; it was transformed to a series of channels and leveed islands in the first half of the 20th century. Sacramento is one of six counties that comprise the Delta region.

DISCUSSION

The General Plan Draft EIR stated that there would be less-than-significant impacts associated with risk of flooding, upon implementation of mitigation measures (Sacramento County 2010: 7-21 – 7-51) and significant and unavoidable impacts to water quality. The Mixed-Use Alternative, which was adopted by the County, would have less-than-significant impacts related to the risk of flooding and significant and unavoidable impacts related to water quality (Sacramento County 7-61 – 7-63).

The Project includes revisions to housing policy and programs, and does not propose new development that would result in physical changes that could affect flooding, water quality, or stormwater drainage.

No new housing sites are proposed as a part of this Housing Element Update beyond those already designated in the County General Plan and evaluated for potential environmental impacts in the County General Plan EIR. No changes to existing zoning are proposed, and the location of development will continue to be guided by the County General Plan land use map and zoning code. Future housing projects will continue to be reviewed through the County's entitlement process and CEQA to ensure consistency with federal and State policies and consistency with all relevant County General Plan goals and policies related to flooding, water quality, or stormwater drainage. The Project does not result in any new significant impacts not analyzed within the General Plan EIR, nor does it worsen any impacts; impacts due to the Project are **less than significant** related to hydrological resources.

1.4.12 Geology and Soils

This section supplements the Initial Study Checklist by analyzing if the Project would:

- Directly or indirectly cause potential substantial adverse effects, including risk of loss, injury or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?
- Result in substantial soil erosion, siltation or loss of topsoil?
- Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, soil expansion, liquefaction or collapse?
- Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available?
- Result in a substantial loss of an important mineral resource?
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

ENVIRONMENTAL SETTING

The earthquake shaking potential in the east and central portions of the County present a relatively low intensity potential for groundshaking, while the westernmost portion of the County in a relatively moderate potential for groundshaking. There are no areas zoned under the Alquist Priolo Earthquake Fault Zone Act in the County. Active faulting has not been mapped as occurring across or immediately adjacent to the County, and surface rupture due to faulting is not expected to occur unless some unknown fault is to rupture. Approximately one-third of the soil types in Sacramento County are considered to be expansive soils. In addition, potential liquefaction problems are associated with areas near downtown Sacramento and in the Delta. (Sacramento County 2010).

There is one known Pleistocene-age fossil-bearing formation, known as the Riverbank formation, located in the County. Fossil vertebrates have been recovered from the Riverbank formation at Arco Arena, along Chicken Ranch Slough near Howe Avenue and Arden Way, at

the Teichert Gravel Pit, the Davis Gravel Pit, and on Ehrhardt Avenue, near the Sacramento Regional Wastewater Treatment Plant (UCMP qtd in Sacramento County, 2010).

Mineral Resource Zones (MRZ) are identified within Sacramento County (Sacramento County 2010). Three MRZs are identified; for areas with known occurrences of minerals with undetermined significance, areas with inferred or indicated significant presence of resources, and areas where geologic information does not rule out either the presence or absence of significant mineral resources.

Significant mineral deposits are present in developed urban areas just south of US-80, within City of Sacramento boundaries, and in the north eastern corner of the County. Kaolin clay deposits may be found along the eastern edge of the County, approximately 3 miles south east of the City of Rancho Murieta. Natural gas deposits are found in the south west region of the county, in the Delta's Rio Vista Field.

Main resources in production are aggregate (sand and gravel), and natural gas (Sacramento County 2010).

DISCUSSION

The General Plan EIR states that there would be less-than-significant impacts related to soils and soil hazards, mineral resources, and geologic hazards (Sacramento County: 13-24 - 13-35).

The Project includes revisions to housing policy and programs and does not propose new development that would result in physical changes that directly or indirectly expose persons or structures to hazards associated with strong seismic ground shaking that results in landslides or liquefaction, unstable soils, or expansive soils. The Project does not propose new development that could cause soil erosion or destroy any unique paleontological resource or site or unique geologic feature. There are no active faults zoned under the Alquist-Priolo Earthquake Fault Zone Act or other known active faults in the County. No known mineral resources would be affected.

No new housing sites are proposed as a part of this Housing Element Update beyond those already designated in the County General Plan and evaluated for potential environmental impacts in the County General Plan EIR. No changes to existing zoning are proposed, and the location of development will continue to be guided by the County General Plan land use map and zoning code. Future housing projects will be subject to site-specific geotechnical studies as determined by the County and required by County General Plan policies. Future housing projects will continue to be reviewed through the County's entitlement process and CEQA to ensure compliance with State and local building codes and seismic safety design standards, such as California Building Code, and to ensure consistency with all relevant County General Plan goals and policies related to seismic, soils, mineral resources, and geologic hazards. The Project does not result in any new significant impacts not analyzed within the General Plan EIR, nor does it worsen any impacts; impacts due to the Project are **less than significant** related to geology and soils.

1.4.13 Biological Resources

This section supplements the Initial Study Checklist by analyzing if the Project would:

- Have a substantial adverse effect on any special status species, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, or threaten to eliminate a plant or animal community?
- Have a substantial adverse effect on riparian habitat or other sensitive natural communities?
- Have a substantial adverse effect on streams, wetlands, or other surface waters that are protected by federal, state, or local regulations and policies?
- Have a substantial adverse effect on the movement of any native resident or migratory fish or wildlife species?
- Adversely affect or result in the removal of native or landmark trees?
- Conflict with any local policies or ordinances protecting biological resources?
- Conflict with the provisions of an adopted Habitat Conservation Plan or other approved local, regional, state or federal plan for the conservation of habitat?

ENVIRONMENTAL SETTING

Sacramento County habitat types include wetland, riverine, riparian, grassland, woodland, cropland, and urban forest. Wetlands are found in association with the County's rivers and creeks and their extended watersheds. Riverine includes the aquatic habitat of the Sacramento, American and Cosumnes Rivers, as well as lesser sized streams and creeks. Riparian habitat is composed of the bank vegetation and forested areas adjacent to the County's rivers, streams, and creeks; most notable is the riparian habitat found along the American River Parkway. Grassland is found throughout the County's open areas, much of it converted from native prairie to grazing land consisting of mostly non-native grasses. Scattered amongst the grazing land are vernal pools which harbor a number of state and federally listed species. Blue oak woodland habitat is found on the County's eastern edge where the valley floor transitions to the lower foothills of the Sierra Nevada. Cropland is found through much of rural southern Sacramento County drawing irrigation waters from the Sacramento and Cosumnes Rivers, as well as groundwater wells. The County's urban forest is comprised of a broad mix of mostly non-native deciduous and evergreen trees with a few stands of remnant and newly planted native oaks.

The species that inhabit these varied landscapes include large mammals, such as deer and the occasional mountain lion along major river corridors; medium sized mammals typically associated with rural landscapes such as badgers, raccoons and skunks; migratory waterfowl; colony nesting birds; shore birds; migratory and resident raptors and songbirds; anadromous and resident fish, amphibians, reptiles, and freshwater invertebrates. Major native vegetation in the County's rural landscapes include oaks, cottonwoods, grape, blackberry, elderberry, native grasses, and a number of small flowering plants associated with vernal pool habitats. Most cropland provides habitat values, typically for foraging. The County's urban forest provides

nesting, roosting, and foraging habitat for many songbirds, as well as other species who have successfully adapted to the human environment.

There are two adopted habitat conservation plans (HCPs) in the County: Natomas Basin HCP (NBHCP) and South Sacramento HCP (SSHCP). Sacramento County led local efforts to adopt the SSHCP. The SSHCP encompasses a 317,000 acre area in south Sacramento County and streamlines federal and state permitting for development and infrastructure projects while conserving habitat. An interconnected regional preserve system of over 36,000 acres – roughly 1.2 times the total size of San Francisco - will be created over the next 50 years to protect twenty-eight plant and wildlife species and their natural habitats (Sacramento County 2021).

The NBHCP applies to the 53,537-acre area interior to the toe of levees surrounding the Natomas Basin, located in the northern portion of Sacramento County and the southern portion of Sutter County. The Basin contains incorporated and unincorporated areas within the jurisdictions of the City of Sacramento, Sacramento County, and Sutter County. The purpose of the NBHCP is to promote biological conservation in conjunction with economic and urban development within the Permit Areas. The NBHCP establishes a multispecies conservation program to minimize and mitigate the expected loss of habitat values and incidental take of Covered Species that could result from urban development, operation and maintenance of irrigation and drainage systems, and certain activities associated with The Natomas Basin Conservancy management of its system of reserves established under the NBHCP. The goal of the NBHCP is to minimize incidental take of the Covered Species in the Permit Areas and to provide mitigation for the impacts of Covered Activities on the Covered Species and their habitat (Sacramento County et al. 2003).

DISCUSSION

The General Plan EIR indicates that there would be significant and unavoidable impacts to special-status species under some circumstances, including development of new growth areas and buildout of planned areas (Sacramento County 2010: 8-31 - 8-69). In addition, the General Plan EIR concluded that there would be significant and unavoidable impacts related to loss of native tree and loss of tree canopy (Sacramento County 2010: 8-69 - 8-81).

The Project includes revisions to housing policies and programs, and does not propose new development that would result in physical changes affecting biological resources.

No new housing sites are proposed as a part of this Housing Element Update beyond those already designated in the County General Plan and evaluated for potential environmental impacts in the County General Plan EIR. No changes to existing zoning are proposed, and the location of development will continue to be guided by the County General Plan land use map and zoning code. Future housing projects will continue to be reviewed through the County entitlement process and CEQA to ensure compliance with federal and State regulations and local policies and ordinances related to biological resources; ensure consistency with the Natomas Basin HCP and South Sacramento HCP, as appropriate; and ensure consistency with all relevant County General Plan goals and policies. The Project does not result in any new significant impacts not analyzed within the General Plan EIR, nor does it worsen any impacts; impacts due to the Project are **less than significant** related to biological resources.

1.4.14 Cultural Resources

This section supplements the Initial Study Checklist by analyzing if the Project would:

- Cause a substantial adverse change in the significance of a historical resource?
- Have a substantial adverse effect on an archaeological resource?
- Disturb any human remains, including those interred outside of formal cemeteries?

ENVIRONMENTAL SETTING

The Sacramento Valley region was populated by indigenous people for thousands of years prior to the influx of Euro-American settlers in the mid-1800s. In fact, occupation in the Sacramento Valley during the Prehistoric Period is estimated to have occurred as early as 12,000 years ago, but only a few archaeological sites have been identified that predate 5,000 years ago. Ethnographic records (from missions and other documents) show that the groups that inhabited Sacramento County are the Nisenan, or Southern Maidu, and the Plains Miwok, a subgroup of the Eastern Miwok. Thus, the Project is located within the territory commonly attributed to the ethnographic Nisenan and the Plains Miwok (Sacramento County 2010).

Established settlement of the Sacramento area did not begin until the late 1830s and early 1840s, when resourceful and independent individuals such as Sutter and Jared Sheldon obtained land grants from the Mexican government, usually in exchange for an agreement to protect Mexican interest in these remote interior regions. With the initial Euro-American settlement of Sacramento County by John Sutter in 1839 at what would become Sutter's Fort, the established outpost brought with it an increase in Euro-American trappers, hunters and settlers to the area. After the arrival of Sutter, several individuals obtained large Mexican Land Grants in the area. As a result of the Mexican War (1847-1848), California became part of the territory of the United States. In 1848, gold was discovered at Sutter's Mill in Coloma. With the discovery of gold in 1848, a torrent of settlers from the east flooded into the Sacramento region. As the population increased and easily found gold decreased, newcomers who decided to stay turned to alternative vocations, particularly agriculture. Many found land comparatively plentiful and cheap. Raising grain, livestock, and produce to sell to the thousands of miners heading to the gold fields proved a profitable venture. These combined events hastened the settlement of the area and the development of Sacramento as an economic and transportation center. The designation of Sacramento as the state capital, in 1854, also resulted in the area's increase in socio-political importance (Sacramento County 2010).

Sacramento County is home to numerous culturally sensitive areas that function as a testament of the substantial, as well as persistent, events and lifeways that have occurred in the County's long history of human habitation. In general, prehistoric, ethnohistoric, and historic period sites were established throughout the County; however, both prehistoric and historic sites are found in greater concentration along waterways which supplied year-around resources to prehistoric and historic period inhabitants. According to the General Plan, areas that are likely or extremely likely to contain prehistoric sites include the Cosumnes River area, the American River area, and the Delta and Sacramento River areas. Historic sites tend to be concentrated in areas still inhabited such as the City of Sacramento, City of Folsom, the Delta, along old travel routes like the Jackson Highway, Central California Traction Railroad, and Southern Pacific Railroad routes and along river and stream beds (Sacramento County 2010).

DISCUSSION

The General Plan EIR indicated that significant impacts to historical and archeological resources would be significant and unavoidable (Sacramento County 2010: 15-22 – 15-31).

The Project includes revisions to housing policy and programs, and does not propose new development that would result in physical changes that could affect a historical resource or an archaeological resource or disturb human remains.

No new housing sites are proposed as a part of this Housing Element Update beyond those already designated in the County General Plan and evaluated for potential environmental impacts in the County General Plan EIR. No changes to existing zoning are proposed, and the location of development will continue to be guided by the County General Plan land use map and zoning code. Future housing projects will continue to be reviewed through the County's entitlement process and CEQA to ensure consistency with federal and State policies and consistency with all relevant County General Plan goals and policies related to the protection and preservation of cultural resources. The Project does not result in any new significant impacts not analyzed within the General Plan EIR, nor does it worsen any impacts; impacts due to the Project are **less than significant** related to cultural resources.

1.4.15 Tribal Cultural Resources

This section supplements the Initial Study Checklist by analyzing if the Project would:

- Would the Project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074?

Under PRC Section 21084.3, public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. California Native American tribes traditionally and culturally affiliated with a geographic area may have expertise concerning their tribal cultural resources (21080.3.1(a)).

ENVIRONMENTAL SETTING

Under PRC Sections 21080.3.1 and 21082.3, Sacramento County must consult with tribes traditionally and culturally affiliated with the project area that have requested formal notification and responded to project notification letters with a request for consultation. The parties must consult in good faith. Consultation is deemed concluded when the parties agree to measures to mitigate or avoid a significant effect on a tribal cultural resource when one is present or when a party concludes that mutual agreement cannot be reached. Mitigation measures agreed on during the consultation process must be recommended for inclusion in the environmental document.

TRIBAL CONSULTATION

On February 16, 2021, Sacramento County sent notification letters that the Project was being addressed under CEQA, as required by PRC 21080.3.1, to the three Native American tribes that had previously requested such notifications: Lone Band of Miwok Indians, Wilton Rancheria, and United Auburn Indian Community of the Auburn Rancheria. The County received no responses by the close of the 30-day response period for AB 52 as defined in

PRC Section 21080.3.1. Therefore, no tribal cultural resources were identified as described under AB 52 and defined in PRC Section 21074.

DISCUSSION

The Project includes revisions to housing policy and programs, and does not propose new development that would result in physical changes that could affect tribal cultural resources.

No new housing sites are proposed as a part of this Housing Element Update beyond those already designated in the County General Plan and evaluated for potential environmental impacts in the County General Plan EIR. No changes to existing zoning are proposed, and the location of development will continue to be guided by the County General Plan land use map and zoning code. Future housing projects will continue to be reviewed through the County's entitlement process and CEQA (including site-specific AB 52 consultation) to ensure consistency with federal and State policies and regulations, as well as consistency with all relevant County General Plan goals and policies, related to tribal cultural resources. The Project does not result in any new significant impacts not analyzed within the General Plan EIR, nor does it worsen any impacts; impacts due to the Project are ***less than significant*** related to tribal cultural resources.

1.4.16 Hazards and Hazardous Materials

This section supplements the Initial Study Checklist by analyzing if the Project would:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment?
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?
- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the project area?
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

ENVIRONMENTAL SETTING

The County of Sacramento has a substantial number of industries and activities that transport, store, or use toxic or hazardous chemicals that pose potential safety hazards. The State Water Resources Control Board's (SWRCB's) Geo Tracker web site indicates that there are 68 open leaking underground storage tank cleanup (SWRCB 2021a) sites across the County, which are generally located in urban areas. There are 15 hazardous materials sites in Sacramento County on the California Department of Toxic Substance Control EnviroStor database. Of these 15 sites, 11 are certified and under operation and maintenance. One active DTSC-listed site is subject to the Federal Superfund program, while the remainder are within State jurisdiction (DTSC 2021). In addition, McClellan Air Force Base Landfill, Mater Field Landfill, and the Sacramento Army Depot are identified by SWRCB as solid waste disposal sites with waste constituents above hazardous waste levels outside the waste management unit (SWRCB 2021b).

There are 11 school districts encompassing all of Sacramento County- serving both communities within existing cities and unincorporated areas of the County (Sacramento County Office of Education 2021).

Seven public airports are located in Sacramento County. Major facilities include Sacramento International, Sacramento Executive, Mather Air Force Base, McClellan Air Force Base and other smaller airports. Sacramento Executive Airport is located in Southwestern Sacramento, in the City of Sacramento. Sacramento International Airport is located at the northwestern corner of the County, north of the US-5 and east of I-9 freeways. The Mather Airport is a commercial airport located in eastern Sacramento County, approximately one mile south of US-50, in of the City of Rancho Cordova. Franklin field is a public use airport located in the south western portion of Sacramento County, approximately 6 miles north west of the City of Galt.

The Sacramento County Emergency Response Operations Plan, Integrated Preparedness Plan, Sacramento County Operational Area Plan, and the Sacramento County Hazard Mitigation Plan are all active and apply to emergency response procedures in the County.

The majority of Sacramento County is not mapped as a Fire Hazard Severity Zone, with the exception of the eastern edge of the County, which is primarily zoned as Moderate in the State Responsibility Area. A small area approximately 3 miles to the east of the community of Herald is zone as Very High Fire Hazard Severity in the Local Responsibility Area and State Responsibility Area (CalFire 2021).

DISCUSSION

The General Plan EIR concluded that existing regulations would ensure that hazards-related impacts would be less than significant (Sacramento County 2010 14-13 – 14-17).

The Project includes revisions to housing policies and programs and does not propose new development that would result in physical changes that could create a hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; result in the accidental release of hazardous materials; interfere with an emergency response plan; or cause wildland fires.

No new housing sites are proposed as a part of this Housing Element Update beyond those already designated in the County General Plan and evaluated for potential environmental impacts in the County General Plan EIR. No changes to existing zoning are proposed, and the location of development will continue to be guided by the County General Plan land use map and zoning code. Construction of new development is required by law to implement and comply with existing federal, State, and local hazardous material regulations to ensure public safety. Future housing projects will continue to be reviewed through the County's entitlement process and CEQA to ensure that future housing projects are consistent with all relevant County General Plan goals and policies related to routine transport, uses, or disposal of hazardous materials; emergency response; and wildland fires. The Project does not result in any new significant impacts not analyzed within the General Plan EIR, nor does it worsen any impacts; impacts due to the Project are **less than significant** related to hazards and hazardous materials.

1.4.17 Energy

This section supplements the Initial Study Checklist by analyzing if the Project would:

- Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction?
- Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

ENVIRONMENTAL SETTING

California relies on a regional power system composed of a diverse mix of natural gas, petroleum, renewable, hydroelectric, and nuclear generation resources:

- **Natural gas:** Almost two-thirds of California households use natural gas for home heating, and about half of California's utility-scale net electricity generation is fueled by natural gas (EIA 2018).
- **Petroleum:** Petroleum products (gasoline, diesel, jet fuel), which are consumed almost exclusively by the transportation sector. Gasoline and diesel fuel sold in California for motor vehicles is refined in California to meet specific formulations required by the California Air Resources Board.
- **Electricity and renewables:** The California Energy Commission estimates that 34 percent of California's retail electricity sales in 2018 was provided by Renewable Portfolio Standard-eligible renewable resources (EIA 2018).
- **Alternative fuels:** Conventional gasoline and diesel may be replaced (depending on the capability of the vehicle) with many alternative transportation fuels (e.g., biodiesel, hydrogen, electricity). Use of alternative fuels is encouraged through various statewide regulations and plans (e.g., Low Carbon Fuel Standard, 2017 Scoping Plan).

Electricity is provided to Sacramento County from SMUD; and gas service is provided by the Pacific Gas and Electric Company.

DISCUSSION

The Project includes revisions to housing policies and programs, and does not propose new development that would result in physical changes that could affect energy resources or plans.

No new housing sites are proposed as a part of this Housing Element Update beyond those already designated in the County General Plan and evaluated for potential environmental impacts in the County General Plan EIR. No changes to existing zoning are proposed, and the location of development will continue to be guided by the County General Plan land use map and zoning code. Future housing projects will continue to be reviewed through the County's entitlement process and CEQA to ensure consistency with federal and State policies and consistency with all relevant County General Plan goals and policies related to energy resources. The Project does not result in any new significant impacts not analyzed within the General Plan EIR, nor does it worsen any impacts; impacts due to the Project are **less than significant** related to energy resources.

1.4.18 Greenhouse Gas Emissions

This section supplements the Initial Study Checklist by analyzing if the Project would:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- Conflict with an applicable plan, policy or regulation for the purpose of reducing the emission of greenhouse gases?

ENVIRONMENTAL SETTING

Certain gases in the earth's atmosphere, classified as greenhouse gases (GHGs), play a critical role in determining the earth's surface temperature. Solar radiation enters the earth's atmosphere from space. Most solar radiation passes through GHGs; however, infrared radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on earth.

Prominent GHGs contributing to the greenhouse effect are carbon dioxide (CO₂), methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. GHG emissions contributing to global climate change are attributable, in large part, to human activities associated with on-road and off-road transportation, industrial/manufacturing, electricity generation by utilities and consumption by end users, residential and commercial on-site fuel use, and agriculture and forestry. It is "extremely likely" that more than half of the observed increase in global average surface temperature from 1951 to 2010 was caused by the anthropogenic increase in GHG concentrations and other anthropogenic forcing together (IPCC 2014:5).

In general, climate change is considered a global problem. GHGs have long atmospheric lifetimes (one to several thousand years) and persist in the atmosphere long enough to be dispersed around the globe. Although the lifetime of any particular GHG molecule is dependent on multiple variables and cannot be determined with any certainty, it is understood that more

CO₂ is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, and other forms of sequestration (IPCC 2013:467).

In 2009, the County and SMUD completed a GHG emissions inventory for the incorporated and unincorporated areas of the County, using 2005 as the emissions baseline year. The 2005 inventory included both emissions generated by the community and internal operations. In 2011, the County adopted a Climate Action Plan (CAP) Strategy and Framework Document (Phase 1 CAP), and in 2012 the County adopted a County Government Operations CAP document (Phase 2A CAP). In 2011, new data and methods were applied to some sectors in the 2005 inventory to update the 2005 emissions estimates (Ascent Environmental 2016). The updated GHG emissions inventory and forecasts provided a foundation for the Climate Action Plan – Communitywide Greenhouse Gas Reduction and Climate Change Adaptation (Communitywide CAP), which was started in 2016. The Communitywide CAP is envisioned to include strategies that will both (1) reduce greenhouse gas emissions that are causing climate change, and (2) help the community prepare for and adapt to the effects of climate change. Preparation of the CAP is ongoing (Sacramento County 2021).

DISCUSSION

The General Plan EIR indicates there would be significant and unavoidable impacts related to GHG emission. Sacramento County has adopted thresholds as part of mitigation required in the General Plan EIR. The thresholds have been updated and revised since the original analysis, but the EIR explicitly states that updates and revisions are to be expected, and the overall conclusions of the General Plan EIR remain appropriate. The General Plan EIR also included other mitigation measures, such as a requirement to develop a detailed Countywide CAP for the community and for government operations (Sacramento County 2010: 12-16 – 12-39). A summary of the Countywide CAP is discussed above under “Environmental Setting.”

The Project includes revisions to housing policies and programs and does not propose new development that would result in physical changes that directly or indirectly generate GHGs.

No new housing sites are proposed as a part of this Housing Element Update beyond those already designated in the County General Plan and evaluated for potential environmental impacts in the County General Plan EIR. No changes to existing zoning are proposed, and the location of development will continue to be guided by the County General Plan land use map and zoning code. Future housing projects will continue to be reviewed through the County’s entitlement process and CEQA to ensure that future housing projects comply with relevant State and local regulations related to GHG emissions and are consistent with all relevant County General Plan goals and policies. The Project does not result in any new significant impacts not analyzed within the General Plan EIR, nor does it worsen any impacts; impacts due to the Project are ***less than significant*** related to GHG emissions.

1.5 INITIAL STUDY CHECKLIST

Appendix G of the CEQA Guidelines provides guidance for assessing the significance of potential environmental impacts. Based on this guidance, Sacramento County has developed the following Initial Study Checklist. The Checklist identifies a range of potential significant effects by topical area. The words "significant" and "significance" used throughout the following checklist are related to impacts as defined by the California Environmental Quality Act as follows:

1. Potentially Significant indicates there is substantial evidence that an effect MAY be significant. If there are one or more "Potentially Significant" entries an Environmental Impact Report (EIR) is required. Further research of a potentially significant impact may reveal that the impact is actually less than significant or less than significant with mitigation.
2. Less than Significant with Mitigation applies where an impact could be significant but specific mitigation has been identified that reduces the impact to a less than significant level.
3. Less than Significant or No Impact indicates that either a project will have an impact but the impact is considered minor or that a project does not impact the particular resource.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
1. LAND USE - Would the project:					
a. Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			X		The Project does not propose new development that would result in physical changes that could conflict with any applicable land use plan.
b. Physically disrupt or divide an established community?			X		The Project does not propose new development that would result in physical changes that could disrupt or divide an established community.
2. POPULATION/HOUSING - Would the project:					
a. Induce substantial unplanned population growth in an area either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of infrastructure)?			X		The Project does not propose new development that would result in physical changes that could induce substantial, unplanned population growth.
b. Displace substantial amounts of existing people or housing, necessitating the construction of replacement housing elsewhere?			X		The Project does not propose new development that would result in physical changes that would either displace substantial amounts of people or housing nor would it require construction of housing elsewhere.
3. AGRICULTURAL RESOURCES - Would the project:					
a. Convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance or areas containing prime soils to uses not conducive to agricultural production?			X		The Project involves revisions to housing policy and programs, and does not propose new development that would result in physical changes that could affect farmland.
b. Conflict with any existing Williamson Act contract?			X		The Project does not propose new development that would result in physical changes that could conflict with a Williamson Act contract.
c. Introduce incompatible uses in the vicinity of existing agricultural uses?			X		The Project does not propose new development that would result in physical changes to agricultural uses within the County.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
4. AESTHETICS - Would the project:					
a. Substantially alter existing viewsheds such as scenic highways, corridors or vistas?			X		The Project involves revisions to existing County housing policy and programs, and does not propose new development that could result in physical changes that could scenic highways, corridors, or vistas.
b. In non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings?			X		The Project does not propose new development that would result in physical changes to the environment that could affect visual character.
c. If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?			X		The Project does not propose new development that would result in physical changes that could conflict with existing and applicable regulations related to scenic quality.
d. Create a new source of substantial light, glare, or shadow that would result in safety hazards or adversely affect day or nighttime views in the area?			X		The Project does not propose new development that would result in new sources of light and glare.
5. AIRPORTS - Would the project:					
a. Result in a safety hazard for people residing or working in the vicinity of an airport/airstrip?			X		The Project involves revisions to County housing policy and programs, and does not propose new development that would result in physical changes that could affect people residing or working near an airport or airstrip.
b. Expose people residing or working in the project area to aircraft noise levels in excess of applicable standards?			X		The Project does not propose new development that would result in physical changes that could affect noise levels.
c. Result in a substantial adverse effect upon the safe and efficient use of navigable airspace by aircraft?			X		The Project does not propose new development that would result in physical changes that could affect navigable airspace.
d. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?			X		The Project includes revisions to housing policy and programs, and does not propose new development that would result in changes to air traffic patterns.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
6. PUBLIC SERVICES - Would the project:					
a. Have an adequate water supply for full buildout of the project?			X		The Project includes revisions to County housing policy and programs, and does not propose new development that would result in physical changes that could affect water supply.
b. Have adequate wastewater treatment and disposal facilities for full buildout of the project?			X		The Project does not propose new development that would result in physical changes that could affect wastewater treatment capacity.
c. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?			X		The Project does not propose new development that would result in physical changes that could affect landfill capacity.
d. Result in substantial adverse physical impacts associated with the construction of new water supply or wastewater treatment and disposal facilities or expansion of existing facilities?			X		The Project does not propose new development that could result in the need for new/expanded water, wastewater, or solid waste disposal facilities.
e. Result in substantial adverse physical impacts associated with the provision of storm water drainage facilities?			X		The Project does not propose new development that would result in physical changes that could affect stormwater drainage facilities.
f. Result in substantial adverse physical impacts associated with the provision of electric or natural gas service?			X		The Project does not propose new development that would result in physical changes that could affect the provisions of electric and natural gas service.
g. Result in substantial adverse physical impacts associated with the provision of emergency services?			X		The Project does not propose new development that would result in physical changes that could affect emergency services provisions.
h. Result in substantial adverse physical impacts associated with the provision of public school services?			X		The Project includes revisions to housing policy and programs, and does not propose new development that would result in physical changes that could affect the provision of public school services.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
i. Result in substantial adverse physical impacts associated with the provision of park and recreation services?			X		The Project includes revisions to housing policy and programs, and does not propose new development that would result in physical changes that could affect park and recreation services.
7. TRANSPORTATION - Would the project:					
a. Conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) – measuring transportation impacts individually or cumulatively, using a vehicles miles traveled standard established by the County?			X		The Project includes revisions to housing policy and programs, and does not propose new development that would result in physical changes that could affect VMT standards.
b. Result in a substantial adverse impact to access and/or circulation?			X		The Project includes revisions to housing policy and programs, and does not propose new development that would result in physical changes that could affect transportation access and/or circulation.
c. Result in a substantial adverse impact to public safety on area roadways?			X		The Project includes revisions to housing policy and programs, and does not propose new development that would result in physical changes that could affect public safety on area roadways.
d. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?			X		The Project includes revisions to housing policy and programs, and does not propose new development that would result in physical changes that could conflict with policies related to the provision of alternative transportation.
8. AIR QUALITY - Would the project:					
a. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?			X		The Project includes revisions to housing policy and programs, and does not propose new development that would result in cumulatively considerable increases in criteria air pollutants.
b. Expose sensitive receptors to pollutant concentrations in excess of standards?			X		The Project does not propose new development that could result in exposure of sensitive receptors to pollutant concentrations in excess of standards.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
c. Create objectionable odors affecting a substantial number of people?			X		The Project does not propose new development that could cause objectionable odors affecting a substantial number of people.
9. NOISE - Would the project:					
a. Result in generation of a temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established by the local general plan, noise ordinance or applicable standards of other agencies?			X		The Project includes revisions to housing policy and programs, and does not propose new development that would result in physical changes that could cause increased ambient noise levels.
b. Result in a substantial temporary increase in ambient noise levels in the project vicinity?			X		The Project does not propose new development that could increase ambient noise levels.
c. Generate excessive groundborne vibration or groundborne noise levels.			X		The Project does not propose new development that generated excessive groundborne vibration or noise.
10. HYDROLOGY AND WATER QUALITY - Would the project:					
a. Substantially deplete groundwater supplies or substantially interfere with groundwater recharge?			X		The Project includes revisions to housing policy and programs, and does not propose physical changes that could substantially deplete groundwater supplies or interfere with groundwater recharge.
b. Substantially alter the existing drainage pattern of the project area and/or increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?			X		The Project does not propose new development that could affect drainage patterns.
c. Develop within a 100-year floodplain as mapped on a federal Flood Insurance Rate Map or within a local flood hazard area?			X		The Project does not propose new development within a 100-year floodplain or local flood hazard area.
d. Place structures that would impede or redirect flood flows within a 100-year floodplain?			X		The Project does not propose new development that would result in physical changes that could redirect or otherwise impeded flood flows.
e. Develop in an area that is subject to 200 year urban levels of flood protection (ULOP)?			X		The Project does not propose new development in an area subject to 200-year ULOP.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
f. Expose people or structures to a substantial risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?			X		The Project does not propose new development that would result in additional risks associated with dam or levee failure.
g. Create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems?			X		The Project does not propose new development that would result in physical changes to existing drainage such that the capacity of existing or planned stormwater facilities may be exceeded.
h. Create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality?			X		The Project does not propose new development that would result in physical changes that could otherwise degrade ground or surface water quality.
11. GEOLOGY AND SOILS - Would the project:					
a. Directly or indirectly cause potential substantial adverse effects, including risk of loss, injury or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?			X		The Project does not propose new development that would result in physical changes that could affect earthquake risks.
b. Result in substantial soil erosion, siltation or loss of topsoil?			X		The Project does not propose new development that would result in physical changes that could result in substantial soil erosion, siltation, or loss of topsoil.
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, soil expansion, liquefaction or collapse?			X		The Project does not propose new development that would be located on unstable soils.
d. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available?			X		The Project does not propose new development involving alternative wastewater disposal systems or septic tanks.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
e. Result in a substantial loss of an important mineral resource?			X		The Project does not propose new development that could affect mineral resources.
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X		The Project does not propose new development that could affect paleontological resources.
12. BIOLOGICAL RESOURCES - Would the project:					
a. Have a substantial adverse effect on any special status species, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, or threaten to eliminate a plant or animal community?			X		The Project does not propose new development that would result in physical changes to the environment that could affect special status species.
b. Have a substantial adverse effect on riparian habitat or other sensitive natural communities?			X		The Project does not propose new development that would result in physical changes to the environment that could affect sensitive communities.
c. Have a substantial adverse effect on streams, wetlands, or other surface waters that are protected by federal, state, or local regulations and policies?			X		The Project does not propose new development that would result in physical changes to the environment that could affect streams, wetlands, or other surface waters.
d. Have a substantial adverse effect on the movement of any native resident or migratory fish or wildlife species?			X		The Project does not propose new development that would result in physical changes to the environment that could affect movement of any native resident or migratory fish or wildlife species.
e. Adversely affect or result in the removal of native or landmark trees?			X		The Project does not propose new development that would result in physical changes to the environment that could result in tree removal.
f. Conflict with any local policies or ordinances protecting biological resources?			X		The Project does not propose new development that would result in physical changes to the environment that could conflict with local policies or ordinances protecting biological resources.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
g. Conflict with the provisions of an adopted Habitat Conservation Plan or other approved local, regional, state or federal plan for the conservation of habitat?			X		The Project does not propose new development that would result in physical changes to the environment that could conflict with an HCP or other approved conservation plan.
13. CULTURAL RESOURCES - Would the project:					
a. Cause a substantial adverse change in the significance of a historical resource?			X		The Project does not propose new development that would result in physical changes to the environment or structures that could affect historical resources.
b. Have a substantial adverse effect on an archaeological resource?			X		The Project does not propose new development that would result in physical changes to the environment that could affect archaeological resources.
c. Disturb any human remains, including those interred outside of formal cemeteries?			X		The Project does not propose new development that would result in physical changes to the environment that could disturb human remains.
14. TRIBAL CULTURAL RESOURCES - Would the project:					
a. Would the Project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074?			X		The Project does not propose new development that would result in physical changes to the environment that could cause a substantial adverse change in the significance of a tribal cultural resource.
15. HAZARDS AND HAZARDOUS MATERIALS - Would the project:					
a. Create a substantial hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X		The Project does not propose new development that would result in a substantial hazard to the public or environment through the routine transport, use, or disposal of hazardous materials.
b. Expose the public or the environment to a substantial hazard through reasonably foreseeable upset conditions involving the release of hazardous materials?			X		The Project does not propose new development that would expose the public or environment to a substantial hazard through reasonably foreseeable upset conditions involving the release of hazardous materials.
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?			X		The Project does not propose new development that would emit hazardous emissions near existing or proposed schools.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
d. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, resulting in a substantial hazard to the public or the environment?			X		The Project does not propose new development that could result in a substantial hazard to the public or environment.
e. Impair implementation of or physically interfere with an adopted emergency response or emergency evacuation plan?			X		The Project does not propose new development that would affect adopted emergency response or evacuation plans.
f. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to or intermixed with urbanized areas?			X		The Project does not propose new development that would result in physical changes to the environment or structures that could increase wildfire-related risks.
16. ENERGY – Would the project:					
a. Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction?			X		The Project does not propose new development that would result in wasteful, inefficient, or unnecessary consumption of energy resources.
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X		The Project does not propose new development that would conflict with renewable energy or energy efficiency plans.
17. GREENHOUSE GAS EMISSIONS – Would the project:					
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X		The Project does not propose new development that would generate GHG emissions.
b. Conflict with an applicable plan, policy or regulation for the purpose of reducing the emission of greenhouse gases?			X		The Project does not propose new development that would result in physical changes that could affect applicable GHG reduction plans.

1.6 INITIAL STUDY PREPARERS

Sacramento County

Environmental Coordinator Joelle Inman
Section Manager Todd Smith
Project Leader Kate Rose
Initial Review Leanne Mueller
Office Manager Kim Lettini
Administrative Support..... Justin Maulit

Ascent Environmental

Principal in ChargeChris Mundhenk
Project Manager Marianne Lowenthal
Environmental Planner Richa Nanavati
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RESPONSE TO COMMENTS ON THE
DRAFT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION (IS/ND)

SACRAMENTO COUNTY HOUSING ELEMENT UPDATE

CONTROL NUMBER: PLNP2019-00027

The Initial Study and Notice of Intent (NOI) to Adopt a Negative Declaration was released on March 30, 2021, with a 30-day public review period. The review period for the NOI closed on April 28, 2020. One comment letter was received during the public review period.

The text that follows introduces each Draft IS/ND reviewer and presents their comments in either as stated or paraphrased form. Responses to those comments immediately follow. Written comments received in full letter format conclude the Response to Comments.

Comment letters were received from the following individuals and/or agencies:

Letter 1 Department of Toxic Substances Control, 8800 Cal Center Drive, Sacramento, California 95826-3200.

LETTER 1: DEPARTMENT OF TOXIC SUBSTANCES CONTROL

8800 Cal Center Drive, Sacramento, California 95826-3200

COMMENT 1.1 (PARAPHRASED):

The Department of Toxic Substances Control (DTSC) received a Negative Declaration for Sacramento County 2021-2029 Housing Element.

DTSC recommends that the following issues are evaluated: the potential for historic or future release of hazardous waste, presence of aerially deposited lead in soil, proximity to former mining activities, demolition-related hazards, sampling of fill, and the potential for organochlorinated pesticides within the project site.

RESPONSE 1.1:

Comments noted. As discussed in Section 1.4.16 of the IS/ND (refer to pages IS-31 through IS-33), no new housing sites are proposed as part of the Housing Element Update. The recommendations listed by DTSC include site-specific issues that cannot be feasibly evaluated at this time because the location of new housing sites is not known. Construction of new development is required by law to implement and comply with existing federal, State, and local hazardous material regulations to ensure public safety, including those identified in this comment. Future housing projects will continue to be reviewed through the County's entitlement process and CEQA consistent with the commenter's request.

ATTACHMENT 1

Letter 1 – Department of Toxic Substance Control



Jared Blumenfeld
Secretary for
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D.
Director
8800 Cal Center Drive
Sacramento, California 95826-3200



Gavin Newsom
Governor

April 1, 2021

Ms. Kate Rose
Sacramento County
827 7th Street, Room 225
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RoseKat@saccounty.net

NEGATIVE DECLARATION FOR SACRAMENTO COUNTY 2021-2029 HOUSING
ELEMENT UPDATE – DATED MARCH 29, 2021 (STATE CLEARINGHOUSE
NUMBER: 2021030670)

Ms. Rose:

The Department of Toxic Substances Control (DTSC) received a Negative Declaration (ND) for Sacramento County 2021-2029 Housing Element Update (Project). The Lead Agency is receiving this notice from DTSC because the Project includes one or more of the following: groundbreaking activities, work in close proximity to a roadway, work in close proximity to mining or suspected mining or former mining activities, presence of site buildings that may require demolition or modifications, importation of backfill soil, and/or work on or in close proximity to an agricultural or former agricultural site.

DTSC recommends that the following issues be evaluated in the ND Hazards and Hazardous Materials section:

1. The ND should acknowledge the potential for historic or future activities on or near the project site to result in the release of hazardous wastes/substances on the project site. In instances in which releases have occurred or may occur, further studies should be carried out to delineate the nature and extent of the contamination, and the potential threat to public health and/or the environment should be evaluated. The ND should also identify the mechanism(s) to initiate any required investigation and/or remediation and the government agency who will be responsible for providing appropriate regulatory oversight.
2. Refiners in the United States started adding lead compounds to gasoline in the 1920s in order to boost octane levels and improve engine performance. This practice did not officially end until 1992 when lead was banned as a fuel additive in California. Tailpipe emissions from automobiles using leaded gasoline contained lead and resulted in aerially deposited lead (ADL) being deposited in

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and along roadways throughout the state. ADL-contaminated soils still exist along roadsides and medians and can also be found underneath some existing road surfaces due to past construction activities. Due to the potential for ADL-contaminated soil DTSC, recommends collecting soil samples for lead analysis prior to performing any intrusive activities for the project described in the ND.

3. If any sites within the project area or sites located within the vicinity of the project have been used or are suspected of having been used for mining activities, proper investigation for mine waste should be discussed in the ND. DTSC recommends that any project sites with current and/or former mining operations onsite or in the project site area should be evaluated for mine waste according to DTSC's 1998 Abandoned Mine Land Mines Preliminary Assessment Handbook (https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/11/aml_handbook.pdf).
4. If buildings or other structures are to be demolished on any project sites included in the proposed project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with DTSC's 2006 *Interim Guidance Evaluation of School Sites with Potential Contamination from Lead Based Paint, Termiticides, and Electrical Transformers* (https://dtsc.ca.gov/wpcontent/uploads/sites/31/2018/09/Guidance_Lead Contamination_050118.pdf).
5. If any projects initiated as part of the proposed project require the importation of soil to backfill any excavated areas, proper sampling should be conducted to ensure that the imported soil is free of contamination. DTSC recommends the imported materials be characterized according to *DTSC's 2001 Information Advisory Clean Imported Fill Material* (https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/SMP_FS_Cleanfill-Schools.pdf).
6. If any sites included as part of the proposed project have been used for agricultural, weed abatement or related activities, proper investigation for organochlorinated pesticides should be discussed in the ND. DTSC recommends the current and former agricultural lands be evaluated in accordance with DTSC's 2008 *Interim Guidance for Sampling Agricultural Properties (Third Revision)* (<https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/Ag-Guidance-Rev-3-August-7-2008-2.pdf>).

DTSC appreciates the opportunity to comment on the ND. Should you need any assistance with an environmental investigation, please submit a request for Lead Agency Oversight Application, which can be found at: <https://dtsc.ca.gov/wp->

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[content/uploads/sites/31/2018/09/VCP_App-1460.doc](#). Additional information regarding voluntary agreements with DTSC can be found at: <https://dtsc.ca.gov/brownfields/>.

If you have any questions, please contact me at (916) 255-3710 or via email at Gavin.McCreary@dtsc.ca.gov.

Sincerely,



Gavin McCreary
Project Manager
Site Evaluation and Remediation Unit
Site Mitigation and Restoration Program
Department of Toxic Substances Control

cc: (via email)

Governor's Office of Planning and Research
State Clearinghouse
State.Clearinghouse@opr.ca.gov

Mr. Dave Kereazis
Office of Planning & Environmental Analysis
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov