

**INITIAL STUDY/  
MITIGATED NEGATIVE DECLARATION**

**DEL PASO REGIONAL PARK  
TRAIL IMPROVEMENT PROJECT  
CITY OF SACRAMENTO, CALIFORNIA**



February 2016

**INITIAL STUDY/  
MITIGATED NEGATIVE DECLARATION**

**DEL PASO REGIONAL PARK  
TRAIL IMPROVEMENT PROJECT  
CITY OF SACRAMENTO, CALIFORNIA**

Submitted to:

City of Sacramento  
Community Development Department  
300 Richards Boulevard 3rd Floor  
Sacramento, California 95811

Prepared by:

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Project No. L19114100

February 2016

City of  
**SACRAMENTO**

COMMUNITY DEVELOPMENT  
DEPARTMENT

ENVIRONMENTAL PLANNING  
SERVICES

300 Richards Boulevard  
Third Floor  
Sacramento, CA 95811

**MITIGATED NEGATIVE DECLARATION**

The City of Sacramento, California, a municipal corporation, does hereby prepare, declare, and publish this Mitigated Negative Declaration for the following described project:

**Del Paso Regional Park Phase 1 Trail Improvements (#L19114100)** - The proposed Project would improve an existing trail located in the eastern-most portion of the project, and add several amenities. This area is generally unimproved natural habitat except for a narrow trail and a post and cable fence. The proposed Project would provide passive recreational amenities in keeping with the natural habitat area.

The Lead Agency is the City of Sacramento. The City of Sacramento, Community Development Department, has reviewed the proposed project and, on the basis of the whole record before it, has determined that there is no substantial evidence that the project, with mitigation measures as identified in the attached Initial Study, will have a significant effect on the environment. This Mitigated Negative Declaration reflects the lead agency's independent judgment and analysis. An Environmental Impact Report is not required pursuant to the Environmental Quality Act of 1970 (Sections 21000, et seq., Public Resources Code of the State of California).

This Mitigated Negative Declaration has been prepared pursuant to the California Environmental Quality Act (Public Resources Code Sections 21000 et seq.), CEQA Guidelines (Title 14, Sections 15000 et seq. of the California Code of Regulations), the Sacramento Local Environmental Regulations (Resolution 91-892) adopted by the City of Sacramento, and the Sacramento City Code.

A copy of this document and all supportive documentation may be reviewed or obtained at the City of Sacramento, Community Development Department, 300 Richards Boulevard, 3<sup>rd</sup> Floor, Sacramento, CA 95811 from 9:00 a.m. to 4:00 p.m. (or 8:00 a.m. to 5:00 p.m. with prior arrangement). The document is also available on the CDD website at:

<http://portal.cityofsacramento.org/Community-Development/Planning/Environmental/Impact-Reports>

Environmental Services Manager, City of Sacramento,  
California, a municipal corporation

By: 

Date: 2/22/16

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# **DEL PASO REGIONAL PARK TRAIL IMPROVEMENT PROJECT (#L19114100)**

## **INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION FOR ANTICIPATED SUBSEQUENT PROJECTS UNDER THE 2035 GENERAL PLAN MASTER EIR**

This Initial Study has been prepared by the City of Sacramento, Community Development Department, 300 Richards Boulevard, Third Floor, Sacramento, CA 95811, pursuant to the California Environmental Quality Act (Public Resources Code Sections 21000 *et seq.*), CEQA Guidelines (Title 14, Section 15000 *et seq.* of the California Code of Regulations) and the Sacramento Local Environmental Regulations (Resolution 91-892) adopted by the City of Sacramento.

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### **ORGANIZATION OF THE INITIAL STUDY**

This Initial Study is organized into the following sections:

**SECTION I - BACKGROUND:** Provides summary background information about the project name, location, sponsor, and the date this Initial Study was completed.

**SECTION II - PROJECT DESCRIPTION:** Includes a detailed description of the proposed Project.

**SECTION III - ENVIRONMENTAL CHECKLIST AND DISCUSSION:** Reviews proposed Project and states whether the project would have additional significant environmental effects (project-specific effects) that were not evaluated in the Master EIR for the 2035 General Plan.

**SECTION IV - ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:** Identifies which environmental factors were determined to have additional significant environmental effects.

**SECTION V - DETERMINATION:** States whether environmental effects associated with development of the proposed Project are significant, and what, if any, added environmental documentation may be required.

**REFERENCES CITED:** Identifies source materials that have been consulted in the preparation of the Initial Study.

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## SECTION I - BACKGROUND

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Project Name and File Number: Del Paso Regional Park Trail Improvements (#L19114100)

Project Location: The project site is located at 3615 Auburn Boulevard in the eastern portion of the Del Paso Regional Park, near the intersection of Auburn Boulevard and Park Road in northeast Sacramento.

Project Applicant: City of Sacramento

Project Planner: Dennis Day, Landscape Architect  
Department of Parks and Recreation  
915 I Street, Rm 3000  
Sacramento, CA 95814  
Phone: 916-808-7633  
E:mail: dday@cityofsacramento.org

Environmental Planner: Dana Mahaffey, Associate Planner,  
Community Development Department  
City of Sacramento  
300 Richards Blvd, 3<sup>rd</sup> Floor  
Sacramento, CA 95811  
Phone: (916) 808- 2762  
Email: dmahaffey@cityofsacramento.org

Date Initial Study Completed: August 28, 2015

This Initial Study was prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code Sections 1500 *et seq.*). The Lead Agency is the City of Sacramento.

The City of Sacramento, Community Development Department, has reviewed the proposed Project and, on the basis of the whole record before it, has determined that the proposed Project is an anticipated subsequent project identified and described in the 2035 General Plan Master EIR and is consistent with the land use designation and the permissible densities and intensities of use for the project site as set forth in the 2035 General Plan. See CEQA Guidelines Section 15176 (b) and (d).

The City has prepared the attached Initial Study to (a) review the discussions of cumulative impacts, growth inducing impacts, and irreversible significant effects in the 2035 General Plan Master EIR to determine their adequacy for the project (see CEQA Guidelines Section 15178(b),(c)) and (b) identify any potential new or additional project-specific significant environmental effects that were not analyzed in the Master EIR and any mitigation measures or alternatives that may avoid or mitigate the identified effects to a level of insignificance, if any.

As part of the Master EIR process, the City is required to incorporate all feasible mitigation measures or feasible alternatives appropriate to the project as set forth in the Master EIR (CEQA Guidelines Section 15177(d)) The Master EIR mitigation measures that are identified as appropriate are set forth in the applicable technical sections below. Policies included in the 2035

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General Plan that reduce significant impacts identified in the Master EIR are identified and discussed in the Master EIR.

This analysis incorporates by reference the general discussion portions of the 2035 General Plan Master EIR. (CEQA Guidelines Section 15150(a)). The Master EIR is available for public review at the City of Sacramento, Community Development Department, 300 Richards Boulevard, Third Floor, Sacramento, CA 95811, and on the City's web site at:

<http://portal.cityofsacramento.org/Community-Development/Planning/Environmental/Impact-Reports>.

The City is soliciting views of interested persons and agencies on the content of the environmental information presented in this document. Due to the time limits mandated by state law, your response must be sent at the earliest possible date, but no later than the 30-day review period ending September 28, 2015.

Please send written responses to:

Dana Mahaffey, Associate Planner  
Community Development Department  
City of Sacramento  
300 Richards Blvd, 3<sup>rd</sup> Floor  
Sacramento, CA 95811  
Direct Line: (916) 808-2762  
dmahaffey@cityofsacramento.org



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## SECTION II - PROJECT DESCRIPTION

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### Introduction

Section II provides information on the location of the proposed Project in the City of Sacramento, background information on the site and surrounding area where the proposed Project would be located, and a description of the components associated with the proposed Project.

### Project Location

The project site is located in the eastern portion of the Del Paso Regional Park, near the intersection of Auburn Boulevard and Park Road in northeast Sacramento (see Figure 1). The project site is bounded by Arcade Creek and Park Road. Rural residences, a boarding stable, picnic areas and the Interstate 80 (I-80)/Auburn Boulevard on- and off-ramps surround the project site (see Figure 2).

### Project Background

Del Paso Regional Park is an approximately 680-acre, multi-use park (see Figure 3), some components of which have been in operation for many decades. The Park includes three golf courses, the Haggin Oaks Golf Complex, which has been open for over 80 years. The Park also includes lighted ball fields. Other recreational features include picnic areas, a sand volleyball court, a play structure and area, restrooms and the Sacramento Softball Complex. The Sacramento Horsemen's Association is located within the Park boundaries, and the park trails are used by equestrians. The Discovery Museum and City Sports Office are also located within the Park boundaries. As shown in Figure 3, substantial portions of the park are designated natural habitat areas, generally along Arcade Creek. In general, the only improvements within the nature areas are dirt trails and post and cable fencing.

The proposed Project would improve an existing trail located in the eastern-most portion of the project, and add several amenities. This area is generally unimproved natural habitat except for a narrow trail and a post and cable fence. The proposed Project would provide passive recreational amenities in keeping with the natural habitat area.

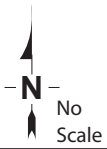
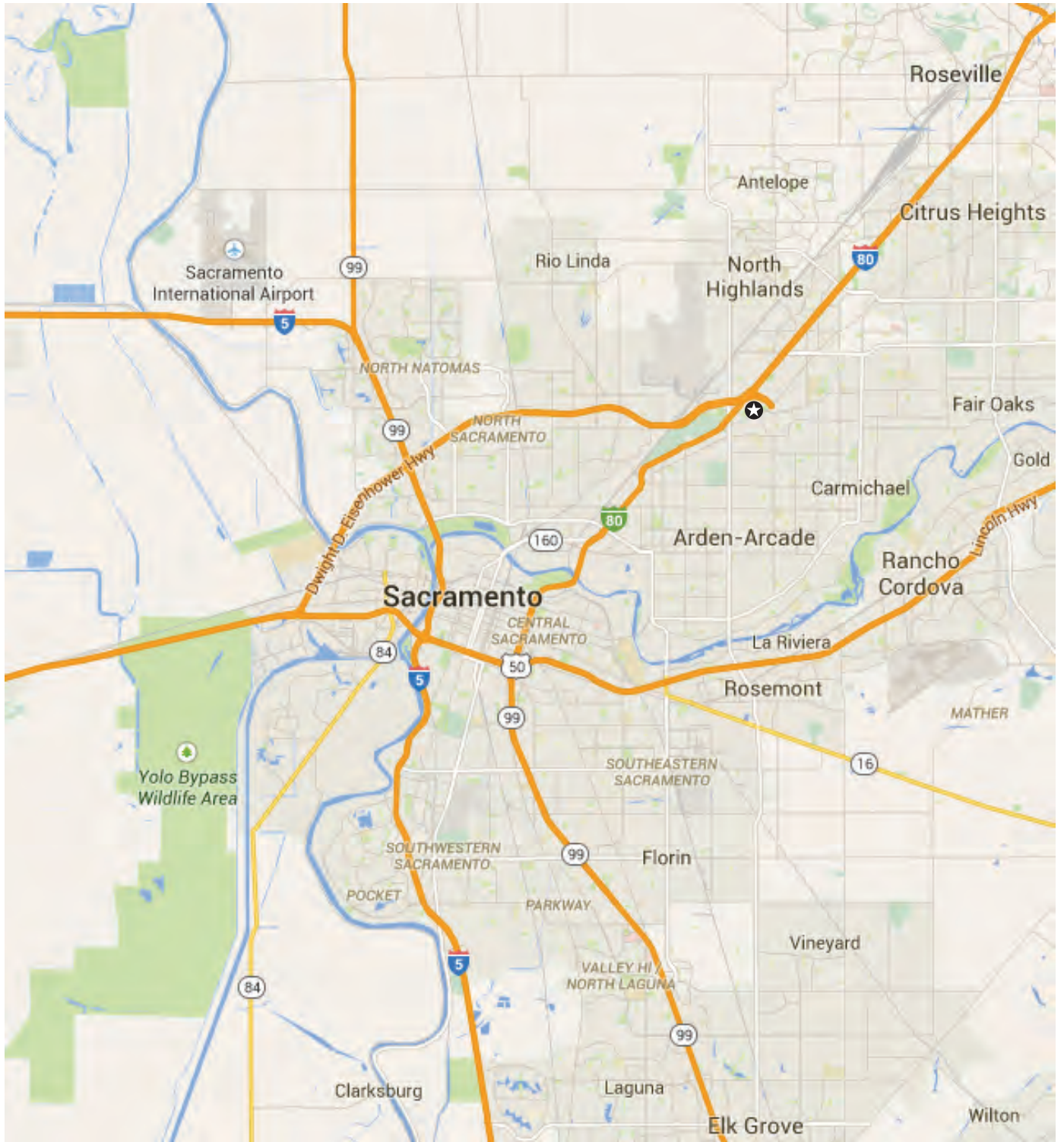
In 1985, the City adopted a Master Plan for the park, which provided for ball fields and parking near Auburn Boulevard and Bridge Street and a nature area and bridle paths in the easternmost portion of the park, including the project site. The 1985 Master Plan designates the majority of the project site as Natural Habitat Area. The easternmost portion of the project site is designated Neighborhood Park in the Master Plan.

The project site is within a natural area composed primarily of grassland and oak woodland.

The project site is designated Recreation and is zoned R-1. Passive recreational facilities are allowed uses within this zoning.

### PROJECT DESCRIPTION

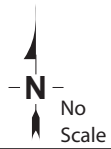
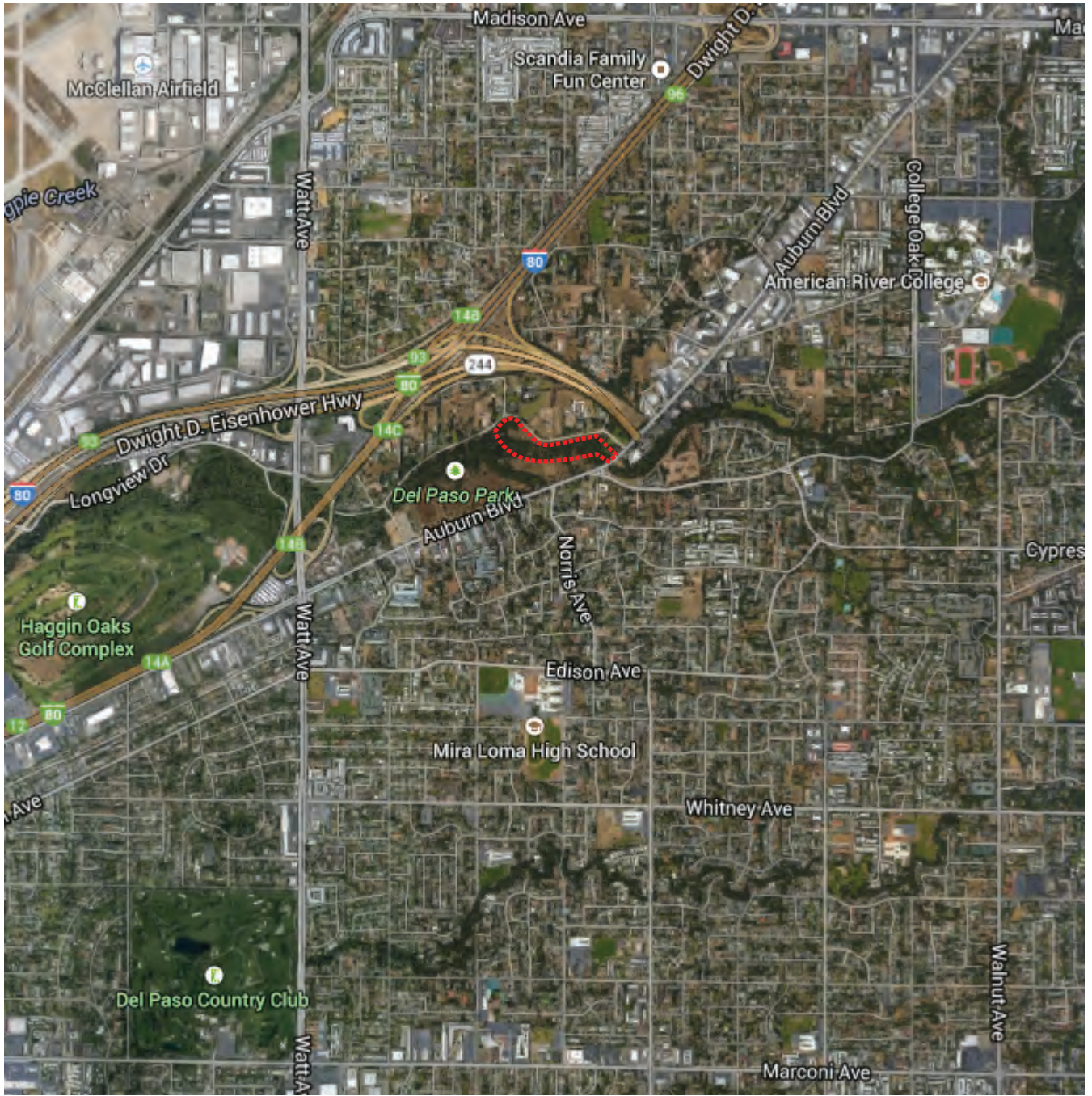
The proposed Project would improve approximately 1,400 linear feet of existing trail adjacent to Arcade Creek (see Figure 4). The trail would be widened to a width of 8 feet using decomposed granite. A new entrance to the trail will be provided at its eastern end. Several new amenities



★ Project Site

SOURCE: A.L. Graham & Associates, 2015.

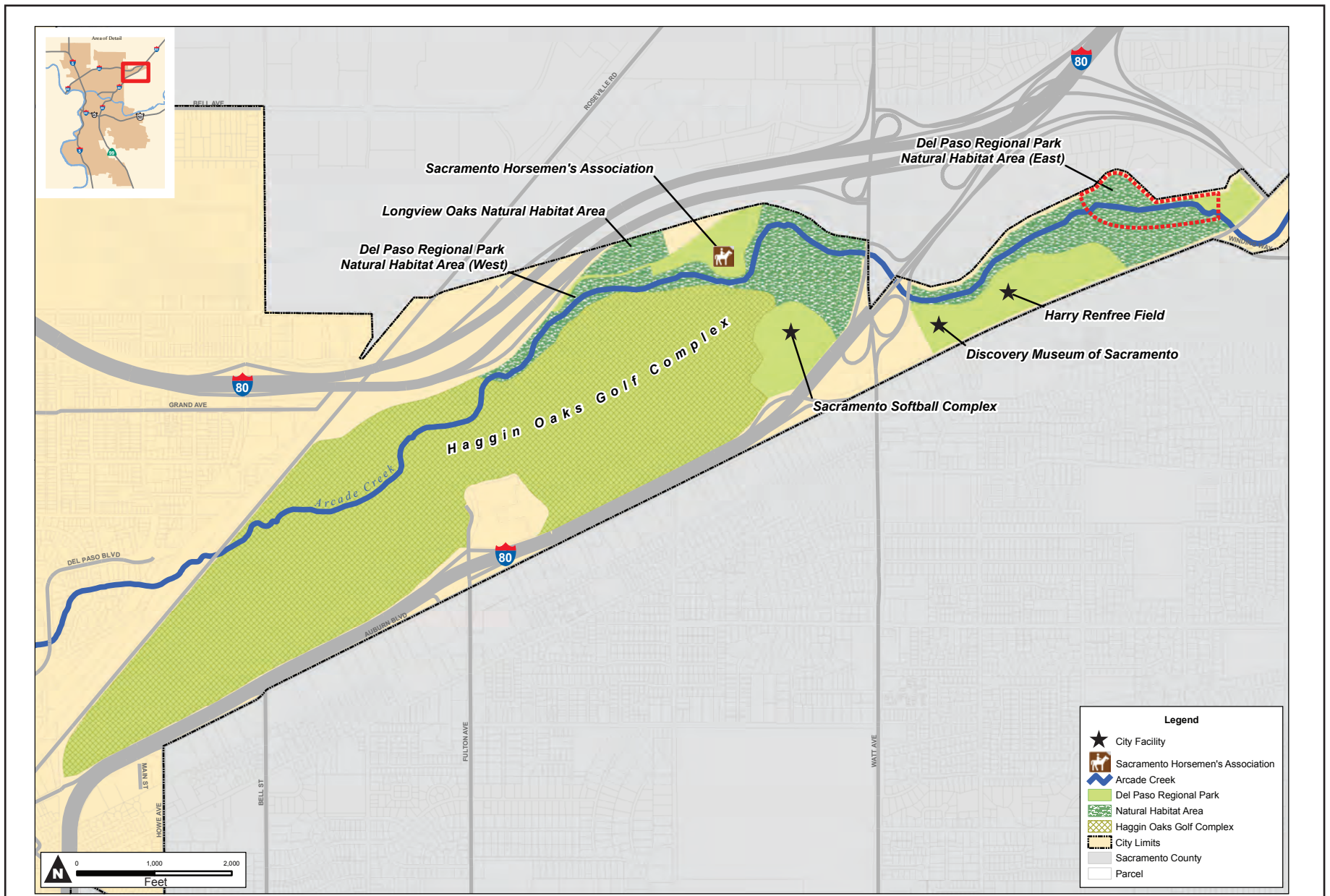
**Figure 1**  
**Project Location**



..... Project Site

SOURCE: A.L. Graham & Associates, 2015.

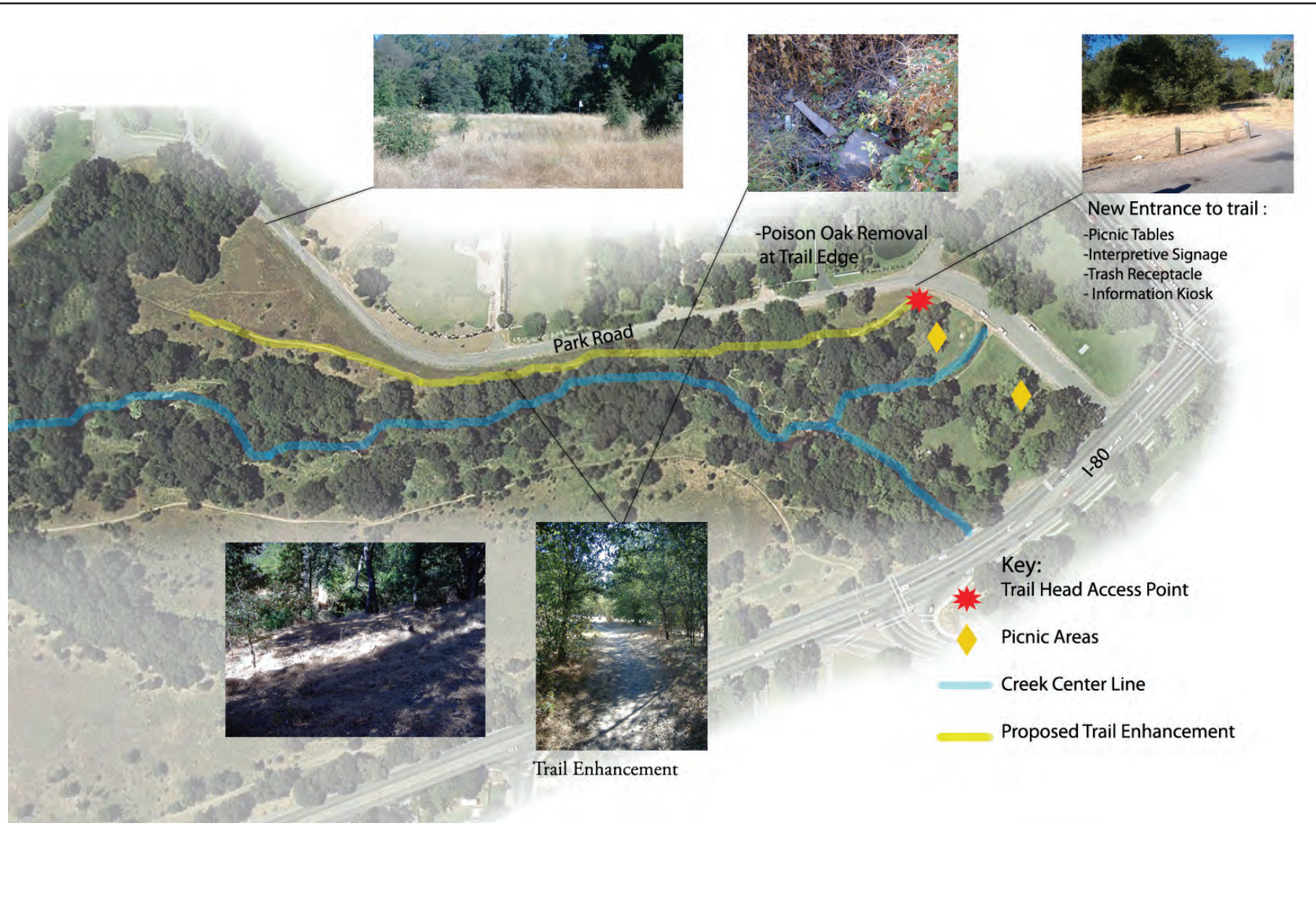
**Figure 2**  
**Project Vicinity**




..... Project Site

SOURCE: City of Sacramento Dept. of Parks and Recreation, A.L. Graham and Associates, 2015.

**Figure 3**  
**Del Paso Regional Park**




 SOURCE: City of Sacramento Dept. of Parks and Recreation, A.L. Graham and Associates, 2015.  
 No Scale

**Figure 4**  
**Proposed Project Improvements**

will be provided in this area, including picnic tables, information kiosk, interpretive sign and a trash receptacle. These amenities are consistent with the Master Plan for the park.

There are no parking lots on the eastern end of Del Paso Regional Park and on-street parking is prohibited on the adjacent Park Road. The nearest parking lot is located at Renfree Field, approximately one-half mile west of the project site. Therefore, access to the project site at present is by foot, horseback or bike only. The proposed Project would provide access points from Park Road for non-vehicular traffic. No additional parking or vehicle access would be provided by the proposed Project.

Construction activities would include vegetation and tree removal where grading and construction would occur. Approximately 6 Valley Oak, 3 Interior Live Oak, 2 Blue Oak and 3 Black Locust would be removed. Additional non-native trees and vegetation may be removed to improve conditions for native trees and vegetation. Poison oak along the trail edge will also be removed.

Minor grading will be required to widen the path and to create pads for the picnic tables. The total area to be disturbed would be approximately 0.75 acre, and is not part of a larger common plan for development. Some cut and fill would be required to balance the site, and excavations would be approximately 1 to 2 feet. Approximately 225 cubic yards of on-site soils would be graded. Approximately 196 cubic yards of decomposed granite would be imported to the project site for the widening of the trail.

Concrete pads will be poured for picnic table pad and as needed to set posts for the post and cable fence and signage.

The fueling area and a concrete wash-out pad will be located near the entrance to the project site.

Typical construction equipment would include the following:

- Backhoe,
- Excavator,
- Cement truck,
- Paver,
- Rollers,
- Motor grader,
- Dump truck, and
- Light tools (i.e. saws, jackhammer).

Most construction related noise would occur during site clearing and grading. All construction work for the proposed Project will comply with the City of Sacramento Standard Construction Specifications (or Best Management Practices).

### **Utilities**

No utilities (e.g. water, sewer or electricity) would be installed on site, and there would be no connections to existing utility lines. There are no utilities within the project site, but there are utilities within the adjacent roadway. Existing utilities in proximity to the project site include natural gas, water, sewer, and telecommunications service. Natural gas is provided by Pacific

Gas and Electric Company (PG&E). Sacramento Municipal Utility District (SMUD) is an overhead utility providing electricity. The City provides municipal water service within the project area, while Sacramento County Sacramento Regional County Sanitation District (SRCSD) provides wastewater collection (sewer) within the project area. Telecommunications services in the project area are provided by AT&T and Comcast.

**Permits**

No permits are required in order to implement the proposed Project.

**Coordination Efforts:**

No wetlands, discharge or other permits are required from the resource agencies (e.g., US Army Corps of Engineers, Regional Water Quality Control Board), so no early consultation has been undertaken with these agencies.

The City held a meeting with stakeholders (e.g., local residents, Sacramento Horsemen's Association) to discuss the proposed Project on July 15, 2015. In addition to reviewing the proposed plans, staff and attendees walked the proposed trail alignment. As a result of this meeting, the proposed trail width was reduced from 10 to 8 feet, and several minor changes were made to the trail alignment and placement of picnic tables and other facilities.

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## **SECTION III – ENVIRONMENTAL CHECKLIST AND DISCUSSION**

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### **LAND USE, POPULATION AND HOUSING, AGRICULTURAL AND FOREST RESOURCES AND ENERGY**

#### **Introduction**

The California Environmental Quality Act (CEQA) requires the Lead Agency to examine the effects of a project on the physical conditions that exist within the area that would be affected by the project. CEQA also requires a discussion of any inconsistency between the proposed Project and applicable general plans and regional plans.

An inconsistency between the proposed Project and an adopted plan for land use development in a community would not constitute a physical change in the environment. When a project diverges from an adopted plan, however, it may affect planning in the community regarding infrastructure and services, and the new demands generated by the project may result in later physical changes in response to the project.

In the same manner, the fact that a project brings new people or demand for housing to a community does not, by itself, change the physical conditions. An increase in population may, however, generate changes in retail demand or demand for governmental services, and the demand for housing may generate new activity in residential development. Physical environmental impacts that could result from implementing the proposed Project are discussed in the appropriate technical sections.

This section of the Initial Study identifies the applicable land use designations, plans and policies, and discusses any potential inconsistencies between these plans and the proposed Project. This section also discusses population and housing, agricultural resources, forestry resources and energy, and explains why the proposed Project would not affect these resources.

#### **Discussion**

##### Land Use and Planning

The project site has been designated as Parks and Recreation in the 2035 General Plan, and is zoned R-1, Single-Unit Dwelling Zone, which allows for recreational uses.

The project site is located in an urbanized portion of the community, within an existing regional park. The proposed Project would widen an existing trail and add a picnic area to the project site, which are consistent and compatible with the existing park uses.

The park site is surrounded by rural residential and horse properties to the north, Arcade Creek to the south, nature area to the west, and parkland and a freeway off-ramp to the east. Once constructed, the proposed Project would provide benefits to trail users. The proposed Project would not interfere with traffic or freeway operations. For these reasons, the proposed widening of the trail and addition of picnic tables is compatible with the surrounding uses.

##### Population and Housing

The proposed Project does not include the development of new housing, so it would not increase the City of Sacramento's current housing stock. Nor is the proposed Project located on



a parcel occupied by residential units that would need to be removed prior to Project implementation. The proposed Project would therefore not displace substantial numbers of existing housing or require the construction of replacement housing to accommodate displaced residents. Based on the information above, the proposed Project would not have an impact on population and housing in the City of Sacramento.

#### Agricultural Resources and Forestry Resources

The Master EIR discussed the potential impact of development under the 2035 General Plan on agricultural resources in Chapter 4.1. In addition to evaluating the effect of the General Plan on sites within the City, the Master EIR noted that to the extent the 2035 General Plan accommodates future growth within the City limits, the conversion of farmland outside the City limits is minimized (Master EIR, Impact 4.1-2 on page 4.1-4). The Master EIR concluded that the impact of the 2035 General Plan on agricultural resources within the City was less than significant.

The project site is designated Urban and Built-Up Land on the Important Farmland Map for Sacramento County.<sup>1</sup> The site is not zoned for agricultural uses, and there are no Williamson Act contracts that affect the project site. No existing agricultural or timber-harvest uses are located on or in the vicinity of the project site. For these reasons, the proposed Project would result in no impacts on agricultural or forestry resources.

#### Energy

The 2035 General Plan includes policies (see Policies U 6.1.9 through 6.1.16) to encourage the spread of energy-efficient technology by offering rebates and other incentives to commercial and residential developers, and recruiting businesses that research and promote energy conservation and efficiency.

Policies U 6.1.6 through 6.1.8 focus on promoting the use of renewable resources, which would reduce the cumulative impacts associated with use of non-renewable energy sources. In addition, Policies 6.1.10 and 6.1.14 call for the City to work closely with utility providers and industries to promote new energy conservation technologies.

The Master EIR evaluated the potential impacts on energy and concluded that the effects would be less than significant (see Master EIR Impact 4.11-6). The proposed Project would require fuels for construction equipment. After construction, the only energy source that would be required would be fuel for landscape equipment, which is already in use to periodically maintain the trail and remove debris. Therefore, the proposed Project would not result in any impacts not identified and evaluated in the Master EIR.

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1. California Department of Conservation, Division of Land Resources, Farmland Mapping and Monitoring Program, *Sacramento County Farmland 2012*, August 2014.

Issues:	Effect will be studied in the EIR	Effect can be mitigated to less than significant	No additional significant environmental effect
1. <u>AESTHETICS, LIGHT AND GLARE</u> Would the proposal:  A) Create a source of glare that would cause a public hazard or annoyance?			X
B) Create a new source of light that would be cast onto oncoming traffic or residential uses?			X
C) Substantially degrade the existing visual character of the site or its surroundings?			X

**ENVIRONMENTAL SETTING**

The visual character of the project site is typical of a nature area in a suburban environment, composed primarily of grassland and oak trees (see Figure 5). The existing dirt path is approximately 1 to 3 feet wide. The current trail is relatively flat through the project area, with some undulations (see Figure 6). The project site is bounded by Arcade Creek to the south, a wooded area to the west, and Park Road to the north and east. Rural residences and a boarding stable are located north of the road in the vicinity of the project site. A post and cable fence runs parallel to Park Road. The creek channel is incised and bordered by trees, but it is visible from the existing trail where it parallels the creek. The trail splits into a “Y” at midway through the project site. The southern arm continues parallel to the creek while the northern arm moves through open grassland to the edge of the project site. Nearby residences and the road are visible from the trail and project area. The project site can be seen from several residences, and from people traveling on Park Road, which often includes pedestrians walking for leisure or recreation. The trail itself is used for walking, horseback riding and biking.

The project site itself does not have any sources of artificial lighting. There are lighted ball fields on the western side of Del Paso Regional Park, but they are not visible from the project site. Lighting from the nearby residences is visible from the project site after dark. There are no street lights on Park Road, so the only nearby illumination originates from the homes adjacent to the road.

**Standards of Significance**

The significance criteria used to evaluate the project impacts to aesthetics are based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines, thresholds of significance adopted by the City in applicable general plans and previous environmental documents, and professional judgment. A significant impact related to aesthetics would occur if the project would:

- substantially degrade the existing visual character or quality of the site and its surroundings; or



**Figure 5: Western Portion of the Project Site**



**Figure 6: Trail through Project Site**

- create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

### **SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MASTER EIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS**

The Master EIR described the existing visual conditions in the General Plan policy area, and the potential changes to those conditions that could result from development consistent with the 2035 General Plan. See Master EIR, Chapter 4.13, Visual Resources.

The Master EIR identified potential impacts for lighting and glare (Impact 4.13-1). However, the proposed Project does not include any elements that would create glare (e.g., reflective surfaces such as large expanses of glazing) or artificial lighting, so these impacts would not apply to the project. The Master EIR also addressed changes in scenic resources and views, and found that the impact of the General Plan would be less than significant with implementation of applicable General Plan policies (Impact 4.13-2).

### **MITIGATION MEASURES FROM 2035 GENERAL PLAN MASTER EIR THAT APPLY TO PROJECT**

There are no mitigation measures that apply to this project.

### **ANSWERS TO CHECKLIST QUESTIONS**

#### A. Glare and B. Light

Glare can be produced by large expanses of reflective surfaces, such as windows or white walls. These surfaces can reflect light at certain times of the day, creating a public hazard or annoyance if the glare persists for a sustained period of time. The proposed Project does not include any elements that would contain glass surfaces or large areas of light colored materials, so it would not produce any glare.

Artificial lighting can create a hazard if it shines directly into vehicular traffic or an annoyance if it spills onto residential property or other sensitive uses. The proposed Project does not provide for any artificial lighting.

Because the project does not include any materials that would produce glare or any artificial impact, there would be ***no impact***.

#### C. Visual Character

As described above, the visual character of the project site is typical of a nature area, with a natural setting and minimal improvements. The proposed Project would provide amenities that would be consistent with the nature area, including a wider trail, picnic tables and interpretive signs. The widened trail would not be noticeably different from the existing trail, especially when the adjacent grass is long. The picnic tables and signs would be visible from portions of the trail and the adjacent road, but would be in character with the nature park like setting. No views would be blocked or interrupted. For these reasons, the change in visual character would be a ***less-than-significant impact***.

### **MITIGATION MEASURES**

No mitigation would be required.

**FINDINGS**

The project would have no additional project-specific environmental effects relating to Aesthetics.

Issues:	Effect will be studied in the EIR	Effect can be mitigated to less than significant	No additional significant environmental effect
<b>2. AIR QUALITY</b>			
<i>Would the proposal:</i>			
A) Result in construction emissions of NO <sub>x</sub> above 85 pounds per day?		X	
B) Result in operational emissions of NO <sub>x</sub> or ROG above 65 pounds per day?			X
C) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?		X	
D) Result in PM <sub>10</sub> concentrations equal to or greater than five percent of the State ambient air quality standard (i.e., 50 micrograms/cubic meter for 24 hours) in areas where there is evidence of existing or projected violations of this standard?		X	
E) Result in CO concentrations that exceed the 1-hour state ambient air quality standard (i.e., 20.0 ppm) or the 8-hour state ambient standard (i.e., 9.0 ppm)?			X
F) Result in exposure of sensitive receptors to substantial pollutant concentrations?			X
G) Result in TAC exposures create a risk of 10 in 1 million for stationary sources, or substantially increase the risk of exposure to TACs from mobile sources?			X
H) Conflict with the Climate Action Plan?			X

**ENVIRONMENTAL SETTING**

The project site is located in the Sacramento Valley Air Basin (SVAB). The primary sources of air pollutants in the SVAB are stationary (most typically associated with manufacturing and industry) and mobile sources (motor vehicles). The Sacramento Metropolitan Air Quality Management District (SMAQMD) is responsible for overseeing air emissions in Sacramento County.

The State and federal governments have set standards for outdoor air quality in order to protect human health. Sacramento County has been designated as non-attainment for three pollutants

under State standards—ozone and particulate matter (PM) under 10 microns (PM<sub>10</sub>) and under 2.5 microns (PM<sub>2.5</sub>). The County is also in nonattainment for ozone and PM<sub>10</sub> under the federal standards.<sup>2</sup>

## STANDARDS OF SIGNIFICANCE

For purposes of this Initial Study, air quality impacts may be considered significant if construction and/or implementation of the proposed Project would result in the following impacts that remain significant after implementation of General Plan policies or mitigation from the General Plan MEIR:

- construction emissions of NO<sub>x</sub> above 85 pounds per day;
- operational emissions of NO<sub>x</sub> or ROG above 65 pounds per day;
- violation of any air quality standard or contribute substantially to an existing or projected air quality violation;
- PM<sub>10</sub> concentrations equal to or greater than five percent of the State ambient air quality standard (i.e., 50 micrograms/cubic meter for 24 hours) in areas where there is evidence of existing or projected violations of this standard. However, if project emissions of NO<sub>x</sub> and ROG are below the emission thresholds given above, then the project would not result in violations of the PM<sub>10</sub> ambient air quality standards;
- CO concentrations that exceed the 1-hour state ambient air quality standard (i.e., 20.0 ppm) or the 8-hour state ambient standard (i.e., 9.0 ppm); or
- exposure of sensitive receptors to substantial pollutant concentrations.

Ambient air quality standards have not been established for toxic air contaminants (TAC). TAC exposure is deemed to be significant if:

- TAC exposures create a risk of 10 in 1 million for stationary sources, or substantially increase the risk of exposure to TACs from mobile sources.

A project is considered to have a significant effect relating to greenhouse gas emissions if it fails to satisfy the requirements of the City's Climate Action Plan.

## SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MASTER EIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

The Master EIR addressed the potential effects of the 2035 General Plan on ambient air quality and the potential for exposure of people, especially sensitive receptors such as children or the elderly, to unhealthful pollutant concentrations (see Master EIR, Chapter 4.2).

Policies in the 2035 General Plan in Environmental Resources were identified as mitigating potential effects of development that could occur under the 2035 General Plan. For example, Policy ER 6.1.1 calls for the City to work with the California Air Resources Board and the SMAQMD to meet state and federal air quality standards; Policy ER 6.1.2 requires the City to review proposed development projects to ensure that the projects incorporate feasible measures that reduce construction and operational emissions; Policy ER 6.1.10 calls for coordination of City efforts with SMAQMD; and Policy ER 6.1.15 requires the City to give

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2. Sacramento Metropolitan Air Quality Management District, *Guide to Air Quality Assessment in Sacramento County*, December 2009, revised November 2014, page 1-2.



preference to contractors using reduced-emission equipment. The Master EIR found that these policies would lessen impacts on air quality, but the long-term operational emissions of ozone precursors and particulate matter would remain a significant and unavoidable impact (Impact 4.2-3).

The Master EIR identified exposure to sources of toxic air contaminants (TAC) as a potential effect. Policies in the 2035 General Plan would reduce the effect to a less-than-significant level. The policies include LU 2.7.5, regarding development along freeways, and Policies ER 6.11.2 and ER 6.11.5, referred to above.

The Master EIR found that greenhouse gas emissions that would be generated by development consistent with the 2035 General Plan would be a less-than-significant impact (see Impact 4.14-1). The Master EIR identified numerous policies included in the 2035 General Plan that addressed greenhouse gas emissions and climate change, including Policies ER 6.1.5-6.1.9 (see Draft MEIR, Chapter 14). Policies identified in the 2035 General Plan include directives relating to sustainable development patterns and practices, and increasing the viability of pedestrian, bicycle and public transit modes. A complete list of policies addressing climate change is included in the Master EIR in Table 4.14-3.

## ANSWERS TO CHECKLIST QUESTIONS

### A. Construction Emissions of NOx

The proposed Project would generate air emissions during construction, including nitrous oxides (NOx), which is an ozone precursor. The SMAQMD has identified a threshold of 85 lbs/day for determining whether NOx emissions would be significant. The SMAQMD has determined that a project will not exceed the District's NOx threshold if the project is less than 35 acres in size, and the project would not include any of the following activities:

- Include buildings more than 4 stories tall;
- Include demolition activities;
- Include significant trenching activities;
- Have a construction schedule that is unusually compact, fast-paced, or involves more than 2 phases (i.e., grading, paving, building construction, and architectural coatings) occurring simultaneously;
- Involve cut-and-fill operations (moving earth with haul trucks and/or flattening or terracing hills);
- Require import or export of soil materials that will require a considerable amount of haul truck activity; and
- Involve soil disturbance activity (i.e., grading) that exceeds 15 acres per day. Note that 15 acres is a screening level and shall not be used as a mitigation measure.<sup>3</sup>

In addition, the SMAQMD requires that projects that use the screening methodology implement the SMAQMD's Basic Construction Emission Control Practices (BCECP), which include measures that would minimize construction-related dust and emissions.

The proposed Project would disturb less than one acre of land, and would not include

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3. Sacramento Management Air Quality Management District, *Guide to Air Quality Assessment in Sacramento County*, December 2009, revised November 2014, page 3-4.

demolition, trenching, a compact schedule or cut and fill activities. The project would require import of decomposed granite for the new trail, but the amount would not require a considerable amount of haul truck trips. No buildings would be constructed.

Because the proposed Project would meet the SMAQMD screening criteria, it would not be expected to exceed 85 lbs/day of NO<sub>x</sub> during construction. Furthermore, Mitigation Measure AQ-1 requires that the proposed Project implement the applicable BCECP. Therefore, this would be a ***less-than-significant impact***.

#### B. Operational Emissions of ROG or NO<sub>x</sub>

After project construction is complete, air emissions will be virtually non-existent. Access to the project site would continue to be by foot, bicycle or horseback, none of which would generate ROG or NO<sub>x</sub>. The project improvements do not include parking or any components that would increase vehicle emissions. Maintenance of the improvements would be part of regular, ongoing maintenance for Del Paso Regional Park. No electricity or gas would be required for project operation. For these reasons, there would be ***no impact*** on air quality due to project operation.

#### C. Ambient Air Quality

As discussed above, the proposed Project would generate minimal air emissions during construction, and none during operation. During construction, the proposed Project could generate some dust and particulate matter due to grading, but the area to be graded would be small (less than an acre) and short term. The project will adhere to the Sacramento Metropolitan Air Quality Management District's Rule 403 - Fugitive Dust as a mitigation measure (AQ-3) in order to take every precaution to limit the dust generation. Therefore, the proposed Project would not violate an air quality standard or contribute to an existing or projected air quality violation. This impact would be ***less than significant***.

#### D. PM<sub>10</sub> Concentrations

The SMAQMD has determined that projects that would disturb fewer than 15 acres and implement the Basic Construction Emission Control Practices, as required by Mitigation Measure AQ-3, do not have the potential to exceed the thresholds for PM<sub>10</sub> or PM<sub>2.5</sub><sup>4</sup>. The project would disturb less than one acre and would implement the identified BCECP; therefore, this would be a ***less-than-significant impact***.

#### E. Carbon Monoxide Concentrations

Carbon monoxide (CO) emissions that exceed established threshold typically occur in areas where there is a concentration of idling motor vehicles. The proposed Project would generate a small amount of traffic from trucks and construction equipment powered by gasoline and diesel engines, which generate exhaust emissions. If construction activities were to increase traffic congestion in the project area, CO and other emissions from traffic would increase slightly while those vehicles are delayed. These emissions would be temporary and limited to the immediate area surrounding the construction site and detour area. The amount of congestion would not be sufficient to exceed CO thresholds, even with project traffic. Furthermore, the proposed Project includes Mitigation Measure AQ-2 to ensure that local roads are not affected by potential idling

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4. Sacramento Management Air Quality Management District, *Guide to Air Quality Assessment in Sacramento County*, December 2009, revised November 2014, page 3-7.

vehicles. After construction, the proposed Project would not increase traffic levels. Therefore, the proposed Project would not result in any increases in CO emissions, and there would be ***no impact***.

#### F. Exposure to Substantial Pollutant Concentrations and G. Toxic Air Contaminants (TAC)

SMAQMD defines sensitive receptors as facilities that house or attract children, the elderly, people with illnesses, or others who are especially sensitive to the effects of air pollutants or may experience adverse effects from unhealthful concentrations of air pollutants. Hospitals, clinics, schools, convalescent facilities, and residential areas are examples of sensitive receptors. The nearest sensitive receptors in the vicinity of the project site are residences located over 75 feet north of the project site.

During construction, the proposed Project could create some dust and emissions from equipment. The amount of dust would be minimized by watering as required by Mitigation Measures AQ-1 and AQ-3, and would occur short-term and emissions are expected to be well below the thresholds. After construction, the proposed Project would not generate dust or other pollutants. There are no other sources of concentrated pollutants or toxic air contaminants in the project vicinity, so those using the project site after construction would not be adversely affected. For these reasons, ***no impact*** would occur.

#### H. Greenhouse Gas Emissions

As discussed above, the proposed Project would generate only minimal air pollutants during construction, and would have no air emissions after construction. This would be the case for greenhouse gases as well. As indicated in the Climate Action Plan Checklist (Appendix A), the proposed Project would not generate greenhouse gasses after construction. Therefore, there would be ***no impact***.

### **MITIGATION MEASURES**

The following project-specific mitigation measures shall be implemented by the proposed Project.

#### Mitigation Measure AQ-1 (Construction Emissions)

The following Basic Construction Emission Control Practices (BCECP) shall be implemented during project construction:

- Water all exposed surfaces two times daily. Exposed surfaces include, but are not limited to soil piles, graded areas, unpaved parking areas, staging areas, and access roads.
- Cover or maintain at least two feet of free board space on haul trucks transporting soil, sand, or other loose material on the site. Any haul trucks that would be traveling along freeways or major roadways should be covered.
- Use wet power vacuum street sweepers to remove any visible trackout mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited.
- Limit vehicle speeds on unpaved roads to 15 miles per hour (mph).

The following practices describe exhaust emission control from diesel powered fleets

working at a construction site. California regulations limit idling from both on-road and off-road diesel powered equipment. The California Air Resources Board enforces the idling limitations.

- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes [required by California Code of Regulations, Title 13, sections 2449(d)(3) and 2485]. Provide clear signage that posts this requirement for workers at the entrances to the site.

Although not required by local or state regulation, many construction companies have equipment inspection and maintenance programs to ensure work and fuel efficiencies.

- Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determine to be running in proper condition before it is operated.

#### Mitigation Measure AQ-2 (Construction Traffic)

Route and schedule construction traffic to avoid peak travel times as much as possible to reduce congestion and related air quality impacts caused by idling vehicles along local roads.

#### Mitigation Measure AQ-3 (Fugitive Dust)

Sacramento Metropolitan Air Quality Management District's Rule 403 - Fugitive Dust would be followed. The general requirements of Rule 403 are: 301 Limitations: A person shall take every reasonable precaution not to cause or allow the emissions of fugitive dust from being airborne beyond the property line from which the emission originates, from any construction, handling or storage activity, or any wrecking, excavation, grading, clearing of land or solid waste disposal operation. Reasonable precautions shall include, but are not limited to:

301.1 Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the construction of roadways or the clearing of land.

301.2 Application of asphalt, oil, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which can give rise to airborne dusts.

301.3 Other means approved by the Air Pollution Control Officer.

With implementation of AQ-1 through AQ-3, the air pollutant emissions of the project would be well below the identified thresholds. Therefore, this impact would be ***less than significant***.

## **FINDINGS**

All additional significant environmental effects of the project relating to Air Quality can be mitigated to a ***less-than-significant level***.

Issues:	Effect will be studied in the EIR	Effect can be mitigated to less than significant	No additional significant environmental effect
<p>3. <u>BIOLOGICAL RESOURCES</u> Would the proposal:</p> <p>A) Create a potential health hazard, or use, production or disposal of materials that would pose a hazard to plant or animal populations in the area affected?</p>			X
<p>B) Result in substantial degradation of the quality of the environment, reduction of the habitat, reduction of population below self-sustaining levels of threatened or endangered species of plant or animal species?</p>		X	
<p>C) Affect other species of special concern to agencies or natural resource organizations (such as regulatory waters and wetlands)?</p>		X	

**ENVIRONMENTAL SETTING**

The following discussion is taken from the *Del Paso Regional Park Trail Improvements Biological Resources Evaluation, Sacramento, California*, prepared by Bumgardner Biological Consulting (January 2015). The biological resources evaluation included a field survey conducted on January 14, 2015. A protocol survey for Brandegees clarkia was conducted on June 11, 2015.

The project site is composed largely of non-native, annual grassland that is managed (i.e., routinely mowed). A portion of the project site also includes a large, continuous stand of mixed-oak riparian woodland bordering Arcade Creek. The overstory is dominated by valley oak (*Quercus lobata*), interior live oak (*Q. wislizeni*) and blue oak (*Q. douglasii*). Other species include canyon live oak (*Q. chrysolepis*), black locust (*Robinia pseudoacacia*) and big leaf maple (*Acer macrophyllum*). The understory is dominated by annual grasses, coyote brush (*Baccharis pilularis*) and poison oak (*Toxicodendron diversilobum*).

No waters that are subject to the jurisdiction of the U.S. Army Corps of Engineers (USACE) or the California Department of Fish and Wildlife (CDFW) occur within or immediately adjacent to the project site.

There are no State or federally listed plant species that could occur within the project area, but there are two plant species on the California Native Plant Society (CNPS) list that have low potential to occur within the project site (see Appendix B). The plant species are Brandegees clarkia (*Clarkia biloba* ssp. *brandegeae*) and northern California black walnut (*Juglans hindsii*). Brandegees clarkia, a CNPS List 4.2 plant (of limited distribution in California), occurs in cismontane woodland, such as the oak-riparian woodland that occurs within and adjacent to the project site. California black walnut is a relatively common element of low-elevation woodland communities, particularly riparian communities such as the woodland within and adjacent to the

project site. This plant is a CNPS List 1B.1 species, which means that it is considered rare, threatened or endangered in California and elsewhere. Neither of these plant species was observed during the field survey, but the survey was conducted outside of the blooming period for each species, which could preclude identification. A protocol survey was conducted for Brandegee's clarkia on June 11, 2015, and the plant was not found.<sup>5</sup>

There are several special-status wildlife species that could occur within the project site, specifically 4 bird species [Cooper's hawk (*Accipiter cooperii*), Swainson's hawk (*Buteo swainsoni*), Nuttall's woodpecker (*Picoides nuttallii*) and Oak titmouse (*Baeolophus inornatus*)] and two bat species [hoary bat (*Lasiurus cinereus*) and western red bat (*Lasiurus blossevillii*)]. Nuttall's woodpecker, a CDFW-designated "special animal", was observed during the field survey, and has been recorded regularly within Del Paso Regional Park. Oak titmouse, also a CDFW special animal, has been recorded within Del Paso Regional Park, but was not observed during the field survey. Both of these species could nest within the project area.

The remaining species are considered to have low potential for presence within the project area. There is suitable nesting habitat for Cooper's hawk, a CDFW special animal, which prefers dense stands of mixed oak and riparian woodlands near water sources, and which has been found nesting in urban areas. Swainson's hawk, a CDFW threatened species, typically nests in riparian woodland or forest stands located adjacent to suitable foraging habitat (e.g., grassland, certain crops). There are no records for Swainson's hawk nests in or adjacent to the project site, but it has been recorded within other portions of Del Paso Regional Park. Finally, the project site contains suitable roosting habitat for two bat species—hoary bat, a CDFW special animal, and western red bat, a CDFW species of special concern.

## STANDARDS OF SIGNIFICANCE

For purposes of this environmental document, an impact would be significant if any of the following conditions or potential thereof, would result with implementation of the proposed Project:

- Creation of a potential health hazard, or use, production or disposal of materials that would pose a hazard to plant or animal populations in the area affected;
- Substantial degradation of the quality of the environment, reduction of the habitat, reduction of population below self-sustaining levels of threatened or endangered species of plant or animal; or
- Affect other species of special concern to agencies or natural resource organizations (such as regulatory waters and wetlands).

For the purposes of this document, "special-status" has been defined to include those species, which are:

- Listed as endangered or threatened under the federal Endangered Species Act (or formally proposed for, or candidates for, listing);
- Listed as endangered or threatened under the California Endangered Species Act (or proposed for listing);
- Designated as endangered or rare, pursuant to California Fish and Game Code (Section 1901);
- Designated as fully protected, pursuant to California Fish and Game Code (Section

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5. Bumgardner Biological Consulting, 2015 Brandegee's Clarkia Survey for Del Paso Regional Park Trail Improvements Project, July 6, 2015.

- 3511, 4700, or 5050);
- Designated as species of concern by U.S. Fish and Wildlife Service (USFWS), or as species of special concern to California Department of Fish and Game (CDFG);
- Plants or animals that meet the definition of rare or endangered under the California Environmental Quality Act (CEQA).

### **SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MASTER EIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS**

Chapter 4.3 of the Master EIR evaluated the effects of the 2035 General Plan on biological resources within the General Plan policy area. The Master EIR identified potential impacts in terms of degradation of the quality of the environment or reduction of habitat or population below self-sustaining levels of special-status birds, through the loss of both nesting and foraging habitat.

Policies in the 2035 General Plan were identified as mitigating the effects of development that could occur under the provisions of the 2035 General Plan. Policy 2.1.5 calls for the City to preserve the ecological integrity of creek corridors and other riparian resources; Policy ER 2.1.10 requires the City to consider the potential impact on sensitive plants for each project and to require pre-construction surveys when appropriate; and Policy 2.1.11 requires the City to coordinate its actions with those of the California Department Fish and Wildlife, U.S. Fish and Wildlife Service, and other agencies in the protection of resources. General Plan Policy ER 3.1.3 requires the City to preserve trees of significance.

The Master EIR concluded that the cumulative effects of development that could occur under the 2035 General Plan would be less-than-significant significant as they related to effects on special-status plant species (Impact 4.3-1), reduction of habitat for special-status invertebrates (Impact 4.3-2), loss of habitat for special-status birds (Impact 4.3-3), loss of habitat for special-status amphibians and reptiles (Impact 4.3-4), loss of habitat for special-status mammals (Impact 4.3-4), special-status fish (Impact 4.3-6) and, in general, loss of riparian habitat, wetlands and sensitive natural communities such as elderberry savannah, and trees (Impacts 4.3-7 through 4.3-10). The contribution to the regional loss of special-status species or their habitat was found to be significant and unavoidable (Impact 4.3-11).

General Plan Policies that would apply to the proposed Project include the following:

**General Plan Policy ER-1.1.7:** The City shall minimize disturbances of natural water bodies and natural drainage systems, protect areas of disturbance from erosion and sediment loss, and comply with the City's erosion and sediment control ordinance and stormwater management and discharge control ordinance.

**Policy ER 2.1.2: Conservation of Open Space.** The City shall continue to preserve, protect, and provide appropriate access to designated open space areas along the American and Sacramento Rivers, floodways, and undevelopable floodplains, provided access would not disturb sensitive habitats or species.

**Policy ER 2.1.5: Riparian Habitat Integrity.** The City shall preserve the ecological integrity of creek corridors, canals, and drainage ditches that support riparian resources by preserving native plants and, to the extent feasible, removing invasive nonnative plants. If preservation is not feasible, adverse impacts on riparian habitat shall be mitigated by the preservation and/or restoration of this habitat in compliance with State and Federal regulations or at a minimum 1:1 ratio, in perpetuity.

**Policy ER 2.1.6: Wetland Protection.** The City shall preserve and protect wetland resources including creeks, rivers, ponds, marshes, vernal pools, and other seasonal wetlands, to the extent feasible. If not feasible, the mitigation of all adverse impacts on wetland resources shall be required in compliance with State and Federal regulations protecting wetland resources, and if applicable, threatened or endangered species. Additionally, the City shall require either on- or off-site permanent preservation of an equivalent amount of wetland habitat to ensure no-net-loss of value and/or function.

**Policy ER 2.1.7: Annual Grasslands.** The City shall preserve and protect native grasslands and vernal pools that provide habitat for rare and endangered species. If not feasible, the mitigation of all adverse impacts on annual grasslands shall comply with State and Federal regulations protecting foraging habitat for those species known to utilize this habitat.

**Policy ER 2.1.8: Oak Woodlands.** The City shall preserve and protect oak woodlands, heritage oaks, and/or significant stands of oak trees in the city that provide habitat for common native, and special-status wildlife species, and shall address all adverse impacts on oak woodlands in accordance with the City's Heritage Tree Ordinance.

**Policy ER 2.1.10: Habitat Assessments and Impact Compensation.** The City shall consider the potential impact on sensitive plants and wildlife for each project requiring discretionary approval. If site conditions are such that potential habitat for sensitive plant and/or wildlife species may be present, the City shall require habitat assessments, prepared by a qualified biologist, for sensitive plant and wildlife species. If the habitat assessment determines that suitable habitat for sensitive plant and/or wildlife species is present, then either (1) protocol-level surveys shall be conducted (where survey protocol has been established by a resource agency), or, in the absence of established survey protocol, a focused survey shall be conducted consistent with industry-recognized best practices; or (2) suitable habitat and presence of the species shall be assumed to occur within all potential habitat locations identified on the project site. Survey Reports shall be prepared and submitted to the City and the California Department of Fish and Wildlife (CDFW) or the United States Fish and Wildlife Service (USFWS) (depending on the species) for further consultation and development of avoidance and/or mitigation measures consistent with state and federal law.

**Policy ER 2.1.11: Agency Coordination.** The City shall coordinate with State and Federal resource agencies (e.g., California Department of Fish and Wildlife (CDFW)), U.S. Army Corps of Engineers, and United States Fish and Wildlife Service (USFWS)) to protect areas containing rare or endangered species plants and animals.

**General Plan Policy ER-3.1.3:** The City shall protect in place all heritage trees, defined under Sacramento City Code Title 12, Chapter 12.64 Heritage Trees as follows:

1. Any tree of any species with a trunk diameter at breast height (dbh) of thirty-two (32) inches or more, which is of good quality in terms of health, vigor of growth and conformity to generally accepted horticultural standards of shape and location for its species.
2. Any native Oak (*Quercus* sp.), California buckeye (*Aesculus californica*) or California sycamore (*Platanus racemosa*), having a dbh of eleven and a half (11.5) inches or greater when a single trunk, or a cumulative dbh of 11.5 inches or greater when a multi-trunk, which is of good quality in terms of health, vigor of growth and conformity to generally accepted horticultural standards of shape and location for its species.



3. Any tree with an eleven and a half (11.5) inches dbh or greater in a riparian zone. The riparian zone is measured from the centerline of the water course to thirty (30) feet beyond the high water line.
4. Any tree, grove of trees or woodland trees designated by resolution of the city council to be of special historical or environmental value or of significant community benefit.

Where tree removal cannot be avoided, the project shall replace removed trees or provide suitable mitigation.

#### MITIGATION MEASURES FROM 2035 GENERAL PLAN MASTER EIR THAT APPLY TO THE PROJECT

The proposed Project would implement the above policies, which were identified as mitigation in the 2035 General Plan Master EIR, to reduce impacts on biological resources, as discussed in more detail below.

#### ANSWERS TO CHECKLIST QUESTIONS

##### A. Health Hazard or Materials that Would Pose a Hazard to Plants or Animals

The proposed Project would not create any health hazards, and does not include the use of any hazardous materials, other than fuels during construction. No storage or refueling would occur onsite, so there would be no risk of a spill. Therefore, there would be **no impact**.

##### B. and C. Sensitive Habitats and Special-Status Species

As discussed above, the project site is composed primarily of non-native, annual grasses and mixed oak riparian woodland. Arcade Creek is located immediately south of the project site, but the proposed Project would not infringe on the creek corridor, and would be compatible with the existing natural setting, and, as discussed in more detail below, would not substantially destroy or degrade riparian vegetation. Therefore, the proposed Project would be consistent with Policy ER 2.1.5, Riparian Habitat Integrity. There are no jurisdictional waters or other wetlands within the project site. Therefore, the proposed Project is consistent with Policy ER 2.1.6, Wetland Protection.

The proposed Project would remove vegetation along the length of the existing trail in order to widen it, and where picnic tables would be located. In addition to grasses, the trail widening would necessitate the removal of 14 trees, consisting of:

- 6 valley oaks (*Quercus lobata*),
- 3 interior live oaks (*Quercus wislizenii*),
- 2 blue oaks (*Quercus douglasii*), and
- 3 black locusts (*Robinia pseudoacacia*).

None of the trees that would be removed for the proposed Project are over 7 inches dbh (diameter at breast height), so none would be considered heritage trees. The removal of the 11 relatively small oak trees would not compromise the integrity of the oak woodland within the project site and surrounding area. The project site would continue to be part of a larger natural area. For these reasons, the impact of removing trees would be **less than significant**.

As required by Policy 2.1.10, Habitat Assessments, a field survey was conducted to identify the habitats and potential special-status species within the project area. The project site contains habitat that could support two CNPS plant species, Brandegee's clarkia and northern California black walnut. A survey was conducted for Brandegee's clarkia, and the plant was not found, so there would be no impact on this species. The likelihood of northern California black walnut being present within the project area is low; however, if present, the species could be damaged or destroyed during vegetation removal and/or grading. Because the area to be cleared is small, the loss of potential habitat would not be substantial, especially since the remainder of the park, which has similar habitat, would be unaffected by the project. Furthermore, the potential loss of habitat and individual plants from within the project area would not reduce the populations below self-sustaining levels. For these reasons, the potential for the proposed Project to affect northern California black walnut would be **a less-than-significant impact**.

Although the impact on northern California black walnut would be less than significant, mitigation is recommended for a protocol survey, consistent with General Plan Policy ER 2.1.10. If any plants are present, they should be avoided if feasible. If avoidance is not feasible, then additional measures are available to replant northern California black walnut. The identified measures would further reduce the less-than-significant impact of the project on these plant species.

The project site and surrounding area also include potential habitat for several wildlife species, including 2 raptor species, 2 other bird species and 2 bat species. Construction activities could be disruptive to these species when they are nesting or roosting. If construction activities caused one or more individuals to abandon their young (or eggs in the case of nesting birds), it would be considered a significant loss. However, mitigation described below would require preconstruction surveys and buffer zones around the nests of any raptor, migratory or special-status birds that are found. Mitigation is also recommended to deter bats from using roosting sites. These mitigation measures would ensure that construction activities would not occur in proximity to nesting birds and roosting bats. Therefore, this would be a **less-than-significant impact with project-specific mitigation**.

The project site would remove only minimal areas of grassland (less than one acre) that would be considered potential foraging habitat for Swainson's hawk, which would not substantially impede the species ability to sustain itself. Therefore, the loss of habitat would be **less than significant**.

After the project is constructed, there would be no additional disturbance beyond the maintenance and recreation activities that currently occur within the park. Therefore, there would be no additional adverse impacts on plant or wildlife species post construction.

## MITIGATION MEASURES

The following project-specific mitigation measures shall be implemented by the proposed Project.

### Mitigation Measure BIO-1 (Northern California Black Walnut)

Although the impact on northern California black walnut would be less than significant, it is recommended that, prior to construction, surveys for this species be conducted during its bloom period or leaf-out (whichever occurs first). The bloom period for this latter species is April to May. Alternatively, a qualified arborist may be able to

identify the taxon prior to blooming or leaf-out. If individual northern California black walnut trees are found, vegetation clearance and ground disturbance should be avoided within 20 feet of the trees if feasible. If avoidance is not feasible, seeds should be collected from other nearby northern California black walnut trees later in the year and planted at appropriate locations elsewhere within Del Paso Regional Park. The replacement plantings should be at a ratio of no less than 5:1 (i.e., 5 seeds planted and protected for each northern California black walnut removed). Protection (e.g., wire cages) should be used for the first three years of growth to reduce potential adverse effects from herbivory (i.e., rodent damage).

#### Mitigation Measure BIO-2 (Raptors, Migratory Birds and Special Status Bird Species)

- A. Preconstruction surveys for nesting special-status birds, raptors protected under Section 3503.5 of the California Fish and Game Code, and other migratory birds shall be conducted prior to any vegetation clearing or other ground disturbance associated with the proposed Project. The preconstruction surveys shall be conducted by a qualified consulting biologist under a two-visit protocol with the first visit occurring no more than 14 days prior to initiation of project construction. The second visit shall occur within the three days prior to initiation of the project. If no nesting raptors, migratory birds or special-status birds are identified, then no further action is required.
- B. If nesting Swainson's hawks are found, project construction shall not be initiated until it can be demonstrated by a qualified biologist that the young-of-the-year are no longer dependent upon the nest site. If other nesting raptors are found, an exclusion zone around each nest shall be established such that no project disturbance occurs within 300 feet of the nests until the young-of-the-year are no longer dependent upon the nest site. Lastly, if other nesting migratory or special-status birds are found, an exclusion zone around each nest shall be established that precludes any project disturbance within 100 feet of the nests until the young-of-the-year are no longer dependent upon the nest site. Alternatively, project construction may be delayed until after August 15, when all local nesting birds are assumed to have completed nesting.
- C. If project construction commences after August 15, when all local nesting birds are assumed to have completed nesting, no surveys would be required.

#### Mitigation Measure BIO-3 (Bats)

A preconstruction survey for hoary bat and western red bat shall be conducted by a qualified consulting biologist within three days prior to initiation of the project. If roosting bats are found, white plastic shall be placed under the roost sites to create glare that encourages the bats to seek roost sites elsewhere (given that these species typically select roost sites over dark ground cover). Once the bats are confirmed as having left the site, construction can begin in the affected area.

## **FINDINGS**

All significant environmental effects of the project relating to Biological Resources can be mitigated to a ***less-than-significant level***.

Issues:	Effect will be studied in the EIR	Effect can be mitigated to less than significant	No additional significant environmental effect
4. <u>CULTURAL RESOURCES</u> Would the project:			
A) Cause a substantial adverse change in the significance of a historical or archaeological resource as defined in § 15064.5?		X	
B) Directly or indirectly destroy a unique paleontological resource?		X	
C) Adversely affect tribal cultural resources?		X	

**ENVIRONMENTAL SETTING**

The project lies within the territory ascribed ethnographically to the Nisenan, or Southern Maidu. Humans may have inhabited the Arcade Creek corridor or portions thereof, for as long as 10,000 years. A prehistoric archaeological site has been identified downstream of the project area on the southern side of Arcade Creek. The site was buried under 9 feet of alluvium. A cultural resource survey was conducted 2004 for the Del Paso Regional Park Detention and Filtration Wetland Project, which is located downstream of the project site, south of Arcade Creek. That study did not identify any cultural resources within the Detention and Filtration Wetland Project boundaries.<sup>6</sup>

Del Paso Regional Park is located in an area that was formerly part of a 44,000-acre Mexican Land Grant known as Rancho del Paso that dates to 1844. Initially, the Rancho was used to raise cattle and wheat. Subsequent owners also used the land for raising sheep, cattle and horses, and for growing grain, hay and hops along the bottomlands of the American River. In the late 1800s, the Rancho was well-known for breeding championship racehorses, including a Kentucky Derby winner. In 1910, the Rancho was sold to a development company. The acreage that became Del Paso Park was acquired by the City of Sacramento in 1914. Over the decades, various recreational facilities were added to the park, including trap shooting in 1926 (replaced by Mel Rapton Honda dealership in 2009), the MacKenzie 18-hole golf course in 1932, a second golf course in 1954, the Sacramento Horsemen’s Association clubhouse and arena (1946) and Renfree Field in 1968. The Sacramento Discovery Science Center and Junior Museum was established in 1974. The Sacramento Softball Complex was built in 1985.<sup>7</sup>

The 2035 General Plan Background Report identifies areas that are considered of high and moderate sensitivity for archaeological resources. The project site does not fall into either of these classifications.<sup>8</sup>

There are no buildings or other structures within the project site.

6. City of Sacramento, *Revised Initial Study/Negative Declaration, Del Paso Regional Park Detention and Filtration Wetland Project*, February 2005, page 59.  
 7. City of Sacramento, Community Development Department, *Draft Haggin Oaks Area Background Report*, October 2009, pages 7 and 8.  
 8. City of Sacramento, *Sacramento 2035 General Plan Draft Background Report*, August 2014, Figure 6.4-1.

The North Central Information Center (NCIC) conducted a search of the California Historic Resources Information System (CHRIS) maps for cultural resource records and surveys within 1/8 mile of the project site. No records of prehistoric-period resources were found. One record of a historic-period cultural resource in the search area was found (P-34-4267). According to the NCIC, there is a low potential for identifying either prehistoric-period, which would include tribal resources, or historic-period cultural resources within the project area. Due to the extent of known cultural resources and the patterns of local land use, the NCIC concluded that further archival and/or field surveys were not recommended.

Paleontological resources, such as fossil remains, can be present in fossil bearing soils and rock formations. The City of Sacramento and surrounding area is not known to have abundant paleontological resources, although there have been some discoveries.<sup>9</sup>

### **STANDARDS OF SIGNIFICANCE**

For purposes of this Initial Study, cultural resource impacts may be considered significant if the proposed Project would result in one or more of the following:

- Cause a substantial change in the significance of a historical or archaeological resource as defined in CEQA Guidelines Section 15064.5 or
- Directly or indirectly destroy a unique paleontological resource.

### **SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MASTER EIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS**

The Master EIR evaluated the potential effects of development under the 2035 General Plan on prehistoric and historic resources (see Chapter 4.4). The Master EIR identified significant and unavoidable effects on historic resources and archaeological resources (see Impacts 4.4-1 and 4.4-2). The Master EIR also addressed the potential destruction of paleontological resources, which was found to be mitigated to a less-than-significant level with implementation of applicable regulations and policies (see Impact 4.5-5).

General Plan policies identified as reducing such effects call for identification of resources on project sites (Policy HCR 2.1.1), implementation of applicable laws and regulations (Policy HCR 2.1.2, HCR 2.1.8 and HCR 2.1.16), consultation with appropriate agencies (Policy HCR 2.1.3), incentives for and enforcement of protection of historic and cultural resources (Policy HCR 2.1.4), early consultation with owners and land developers to minimize effects (Policy HCR 2.1.10) and encouragement of adaptive reuse of historic resources (Policy HCR 2.1.14). Demolition of historic resources is deemed a last resort (Policy HCR 2.1.15).

### **MITIGATION MEASURES FROM 2035 GENERAL PLAN MASTER EIR THAT APPLY TO THE PROJECT**

The proposed Project would implement the above policies, which were identified as mitigation in the 2035 General Plan Master EIR, to reduce impacts on cultural resources, as discussed in more detail below.

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9. City of Sacramento, *Sacramento 2035 General Plan Draft Environmental Impact Report*, August 2014, page 4.5-7.

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## ANSWERS TO CHECKLIST QUESTIONS

As discussed above, the project site is not considered likely to contain archaeological, including tribal resources, historic or paleontological resources. There are no structures on the project site, so there would be no demolition. The proposed Project would include grading along the trail and for the picnic table pads, but this grading would be shallow, and there would be no trenching or excavation. An archaeological site was identified south of Arcade Creek, but at a depth (approximately 9 feet) that greatly exceeds the excavation depths for the proposed Project.

While it is unlikely that the project site contains any cultural or paleontological resources that would be disturbed by project grading, it is possible that such resources are present. Mitigation Measure CUL-1 would ensure that if such resources are present, they would be identified and treated appropriately. With this mitigation, the impact would be **less than significant**, and consistent with the General Plan policies referenced above.

## MITIGATION MEASURES

The following project-specific mitigation measures shall be implemented by the proposed Project.

### Mitigation Measure CUL-1 (Discovery of Cultural or Paleontological Resources)

If buried cultural or paleontological resources, such as chipped or ground stone, historic debris, building foundations or fossils, are discovered during ground-disturbing activities, work shall stop in that area and within 100 feet of the find until a qualified archaeologist can assess the significance of the find and, if necessary, develop appropriate treatment measures in consultation with the City. If human burials are encountered, all work in the area shall stop immediately and the Sacramento County Coroner's office shall be notified immediately. If the remains are determined to be Native American in origin, both the Native American Heritage Commission and any identified descendants will be notified and recommendations for treatment solicited (14 CCR 15064.5; California Health and Safety Code 7050.5; PRC 5097.94 and 5097.98).

## FINDINGS

All additional significant environmental effects of the project relating to Cultural Resources can be mitigated to a **less-than-significant level**.

Issues:	Effect will be studied in the EIR	Effect can be mitigated to less than significant	No additional significant environmental effect
<p>5. <u>GEOLOGY AND SOILS</u></p> <p>Would the project allow a project to be built that will either introduce geologic or seismic hazards by allowing the construction of the project on such a site without protection against those hazards?</p>			X

**ENVIRONMENTAL SETTING**

The Sacramento Valley is subject to seismic activity, although the intensity of seismic events is lower than in most areas of the state. There are no faults or Alquist-Priolo Earthquake Fault Zoning Act special studies zones within Sacramento County<sup>10</sup>. The project site is located approximately 14 miles west of the Prairie Creek-Spenceville-Deadman branch of the Foothills Fault System.<sup>11</sup> According to the California Division of Mines and Geology, the site is within a Low Severity Zone, which is subject to potential damage from earthquake groundshaking at a maximum intensity of VIII of the Modified Mercalli Scale. An earthquake of intensity VIII could cause alarm, and structural damage would be moderate depending on structural design. The potential for liquefaction at the project site is considered very low.<sup>12</sup>

The site does not contain unique geologic or physical features.

Four soils have been mapped within the project site:

- Bruella sandy loam, 0 to 2 percent slopes,
- Liveoak sandy clay loam, 0 to 2 percent slopes, occasionally flooded,
- Fiddymment-Urban land complex, 1 to 8 percent slopes, and
- Reiff fine sandy loam, 0 to 2 percent slopes, occasionally flooded.

These soils do not pose constraints that would preclude construction of trails and recreational facilities. The Bruella series soils are very deep, well or moderately well drained, and form in alluvium from granitic rock sources. Bruella series soils typically occur on low terraces and fans. The Liveoak series soils are very deep, moderately well drained, and form in loamy alluvium from mixed sources. Liveoak series soils form on low alluvial terraces.<sup>13</sup> Fiddymment-urban soils are moderately deep and well-drained. Reiff soils are very deep and well drained.

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10. California Department of Conservation, Regional Geological Hazards and Mapping Program, [www.conservation.ca.gov/CGS/Regional](http://www.conservation.ca.gov/CGS/Regional) Geological Hazards and Mapping Program/AP, accessed May 21, 2015.

11. City of Sacramento, *Revised Initial Study/Negative Declaration, Del Paso Regional Park Detention and Filtration Wetland Project*, February 2005, page 18.

12. Wallace Kuhl & Associates, *Geotechnical Engineering Report, Del Paso Park Multi-Use Trail, WKA No. 9330.53P*, May 22, 2015, page 5.

13. Natural Resources Conservation Service, Web Soil Survey, National Cooperative Soil Survey, Soil Map—Sacramento County, California, April 16, 2015.

A Geotechnical Engineering Report was prepared for the proposed Project to characterize the geological and soils conditions on the project site. In preparing the report, soil samples were collected and tested, existing information was reviewed, and an engineering analysis was prepared. The report concluded that surface and near surface soils could support the park structures that are proposed, and that site soils have a low expansion potential.<sup>14</sup> The permanent groundwater table is located approximately 105 to 140 feet below the project surface, and no groundwater was detected in the borings that were done on site to depths of 2.25 to 4.5 feet below surface.<sup>15</sup> However, perched or seepage water could be present at shallower depths during certain times of the year.<sup>16</sup> The report makes recommendations for site clearing, subgrade preparation, engineered fill, exterior flatwork, compaction of the subgrade, drainage, and other construction considerations.<sup>17</sup>

### STANDARDS OF SIGNIFICANCE

For the purposes of this Initial Study, an impact is considered significant if it allows a project to be built that will either introduce geologic or seismic hazards by allowing the construction of the project on such a site without protection against those hazards.

### SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MASTER EIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

Chapter 4.5 of the Master EIR evaluated the potential effects related to seismic hazards, underlying soil characteristics, slope stability, erosion, existing mineral resources and paleontological resources in the General Plan policy area. Implementation of identified policies in the 2035 General Plan reduced all effects to a less-than-significant level. Policies EC 1.1.1 and 1.1.2 require regular review of the City's seismic and geologic safety standards and geotechnical investigations for project sites.

### MITIGATION MEASURES FROM 2035 GENERAL PLAN MASTER EIR THAT APPLY TO THE PROJECT

None.

### ANSWERS TO CHECKLIST QUESTIONS

#### A. Geologic and Seismic Hazards

The proposed Project is not located in an area subject to substantial seismic activity, and no habitable structures would be constructed as part of the project. As discussed above, the project soils and geology can support trails and picnic tables. The proposed Project will be constructed according to the recommendations of the geotechnical report, which will ensure that project features are stable. For these reasons, impacts related to soils and geology would be ***less than significant***.

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14. Wallace Kuhl & Associates, *Geotechnical Engineering Report, Del Paso Park Multi-Use Trail, WKA No. 9330.53P*, May 22, 2015, pages 4 and 6.
  15. Wallace Kuhl & Associates, *Geotechnical Engineering Report, Del Paso Park Multi-Use Trail, WKA No. 9330.53P*, May 22, 2015, page 4.
  16. Wallace Kuhl & Associates, *Geotechnical Engineering Report, Del Paso Park Multi-Use Trail, WKA No. 9330.53P*, May 22, 2015, page 8.
  17. Wallace Kuhl & Associates, *Geotechnical Engineering Report, Del Paso Park Multi-Use Trail, WKA No. 9330.53P*, May 22, 2015, pages 8 through 12.



**MITIGATION MEASURES**

None required.

**FINDINGS**

The project would have no additional project-specific environmental effects relating to Geology and Soils.

Issues:	Effect will be studied in the EIR	Effect can be mitigated to less than significant	No additional significant environmental effect
<p><b>6. HAZARDS</b></p> <p>Would the project:</p> <p>A) Expose people (e.g., residents, pedestrians, construction workers) to existing contaminated soil during construction activities?</p>		X	
<p>B) Expose people (e.g., residents, pedestrians, construction workers) to asbestos-containing materials or other hazardous materials?</p>			X
<p>C) Expose people (e.g., residents, pedestrians, construction workers) to existing contaminated groundwater during dewatering activities?</p>			X

**ENVIRONMENTAL AND REGULATORY SETTING**

Before the Del Paso Regional Park was created, it was used for pasture land and limited agricultural use. The project site does not appear to have been used for orchards, row crops or other agricultural activities that would have involved extensive application of pesticides, herbicides, fertilizers or other potentially hazardous materials. Currently, the project site is part of a nature area that is mown periodically, rather than sprayed.

Federal regulations and regulations adopted by the Sacramento Metropolitan Air Quality Management District (SMAQMD) apply to the identification and treatment of hazardous materials during construction activities. Failure to comply with these regulations respecting asbestos may result in a Notice of Violation being issued by the AQMD and civil penalties under state and/or federal law, in addition to possible action by U.S. EPA under federal law.

The project site is not on any list of hazardous materials sites compiled by the State of California (e.g., the Cortese list), and there are no sites in the project vicinity.<sup>18</sup>

**STANDARDS OF SIGNIFICANCE**

For the purposes of this Initial Study, an impact is considered significant if the proposed Project would:

- expose people (e.g., residents, pedestrians, construction workers) to existing contaminated soil during construction activities;

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18. California Department of Toxic Substances, *Envirostar Database*, accessed May 21, 2015.

- expose people (e.g., residents, pedestrians, construction workers) to asbestos-containing materials or other hazardous materials; or
- expose people (e.g., residents, pedestrians, construction workers) to existing contaminated groundwater during dewatering activities.

### **SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MASTER EIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS**

The Master EIR evaluated effects of development on hazardous materials, emergency response and aircraft crash hazards (see Chapter 4.6). Implementation of the General Plan may result in the exposure of people to hazards and hazardous materials during construction activities, and exposure of people to hazards and hazardous materials during the life of the General Plan. Impacts identified related to construction activities and operations were found to be less than significant. Policies included in the 2035 General Plan, including PHS 3.1.1 (investigation of sites for contamination), PHS 3.1.2 (preparation of hazardous materials actions plans when appropriate), and PHS 3.1.4 (restricting routes for transportation of hazardous materials), and PHS 4.1.1 (multi-hazard emergency plan), were effective in reducing the identified impacts.

### **MITIGATION MEASURES FROM 2035 GENERAL PLAN MASTER EIR THAT APPLY TO THE PROJECT**

None.

### **ANSWERS TO CHECKLIST QUESTIONS**

#### **A. Exposure to Contaminated Soils**

Construction equipment requires small quantities of hazardous materials (e.g., petroleum and other chemicals). If fuels or other hazardous chemicals were spilled in the project area and left unattended, people using the project area could be exposed. The proposed Project would be subject to an erosion control plan that would prevent project soils from entering Arcade Creek. These measures would protect the creek from any fuels or other contaminants that were spilled within the project site.

If a spill were to occur, and the contaminated area was not cleaned up quickly, there would be the possibility that construction workers and/or people using the trail or picnic tables (as well as wildlife and pets) could be exposed to contamination. The potential risk of exposure is low due to the small area where construction equipment would be working and the short duration of project construction.

Exposure to contaminated soils could also occur if hazardous materials had been spilled within the project site in the past, and project grading uncovers the residual contamination.

Mitigation Measure HAZ-1 would ensure that if any contaminants were exposed or released within the project site, they would be cleaned up immediately in compliance with applicable laws, eliminating the risk of exposure for construction workers and park users. With mitigation, the potential for exposure to contaminated soils during construction would be a ***less-than-significant impact***.

## B. Exposure to Asbestos-Containing Materials

Asbestos was used for insulation in buildings and infrastructure (e.g., pipes) prior to 1978. Exposure to asbestos can occur when pre-1978 buildings or facilities are demolished. There are no structures on the project site, so no demolition will occur. Therefore, there will be ***no impact***.

## C. Exposure to Contaminated Groundwater

The proposed Project involves grading, but no excavation. Therefore, project construction will not encounter groundwater, and ***no impact*** would occur.

## **MITIGATION MEASURES**

The following project-specific mitigation measures shall be implemented by the proposed Project.

### Mitigation Measure HAZ-1 (Discovery of Contaminated Soil or Groundwater)

To minimize impacts from the handling and use of potentially hazardous materials, the contractor shall follow all necessary precautions according to the applicable California Health and Safety Codes to prevent any spill of a toxic or hazardous substance.

If evidence of contaminated soils is discovered during grading, work in the vicinity of the contaminated area shall cease until the suspected contaminated soils are characterized and remediated.

Hazardous or contaminated materials may be removed and disposed of from the project site only in accordance with the following provisions:

- a. All work is to be completed in accordance with the following regulations and requirements:
  - i. Chapter 6. 5, Division 20, California Health and Safety Code;
  - ii. California Administration Code, Title 22, relating to Handling, Storage, and Treatment of Hazardous Materials; and
  - iii. City of Sacramento Building Code and the Uniform Building Code.
- b. Coordination shall be made with the County of Sacramento Environmental Management Department, Hazardous Materials Division, and the necessary applications shall be filed.
- c. Any hazardous materials shall be disposed of at an approved disposal site and shall be hauled only by a current California registered hazardous waste hauler using correct manifesting procedures and vehicles displaying a current Certificate of Compliance. The contractor shall identify by name and address the toxic substances disposal site. No payment for removal and disposal services shall be made without a valid certificate from the approved disposal site that the material was delivered.

**FINDINGS**

All additional significant environmental effects of the project relating to Hazards can be mitigated to a ***less-than-significant level***.

Issues:	Effect will be studied in the EIR	Effect can be mitigated to less than significant	No additional significant environmental effect
7. <u>HYDROLOGY AND WATER QUALITY</u> Would the project:			
A) Substantially degrade water quality and violate any water quality objectives set by the State Water Resources Control Board, due to increases in sediments and other contaminants generated by construction and/or development of the project?			X
B) Substantially increase the exposure of people and/or property to the risk of injury and damage in the event of a 100-year flood ?			X

**ENVIRONMENTAL SETTING**

The City of Sacramento is located in an area that has a Mediterranean climate where summers are hot and dry and winters are mild and wet. Most of the precipitation that the City of Sacramento receives occurs between November and April. Average rainfall in the City of Sacramento is 17.54 inches per year.

The project site is bordered on the south by Arcade Creek, one of many creeks in the Sacramento region that drain to the Sacramento River via a network of creeks and canals.

**Water Quality**

The Sacramento and American Rivers in the City of Sacramento have been identified by the Central Valley Regional Water Quality Control Board (CVRWQCB) as surface water bodies that have beneficial uses that are impacted by poor water quality. The beneficial uses identified on both of these rivers include: municipal/agricultural/recreational water supplies; freshwater habitat; spawning grounds; wildlife habitat; navigation on the Sacramento River; and industrial uses on the American River. The Sacramento River is listed as impaired under the 303(d) list for mercury, diazinon, chlordane, DDT, dieldrin and polychlorinated biphenyls (PCBs); the American River is listed for mercury and PCBs. Arcade Creek exceeds water quality standards for chlorpyrifos, diazinon, copper, malathion, pyrethroids and sediment toxicity.<sup>19</sup>

Arcade Creek receives stormwater from surrounding developed areas and garden and lawn irrigation runoff. Water from these sources can contain urban contaminants, such as fuels, herbicides and pesticides. The City has constructed a detention basin in the park, south of Arcade Creek, that includes a wetland area designed to filter contaminants from run off.

The project site is not a source of water quality contaminants, because it does not include impervious surfaces or areas that collect fuels and related contaminants, such as roads and

19. City of Sacramento, *Sacramento 2035 General Plan Draft Background Report*, August, 11, 2014, Table 6-4.

driveways. However, run off from Park Road and residential areas to the north could contain urban contaminants that enter Arcade Creek.

### Stormwater Quality/Urban Runoff Management

The County of Sacramento and the cities of Sacramento, Folsom, Citrus Heights, Elk Grove, Rancho Cordova, and Galt have a joint Municipal Separate Storm Sewer System NPDES permit (MS4 Permit No. CAS082597) that was granted on September 11, 2008. The permittees formed the Sacramento Stormwater Quality Partnership and prepared a Stormwater Quality Improvement Plan (SQIP) to address the MS4 permit requirements and reduce the pollution carried by stormwater into local creeks and rivers. The SQIP addresses pollution reduction activities for construction sites, industrial sites, illegal discharges and illicit connections, new development, and municipal operations.<sup>20</sup>

The City's Grading and Sediment Erosion Control Ordinance (Chapter 15.88 of the City Code) requires erosion, sediment and pollution control plans for both during and after construction of a project, and grading plans. The Ordinance applies to projects where the volume of material graded is more than 50 cubic yards.

### **Flood Risk and Drainage**

The Arcade Creek system provides flood protection to areas of North Sacramento east of Steelhead Creek. Arcade Creek is part of a broader drainage system that discharges to the Natomas East Main Drainage Canal (NEMDC)/Steelhead Creek and ultimately to the Sacramento River. The Arcade Creek watershed has changed over the last 70 years. Prior to the area being developed, stormwater runoff would infiltrate the ground or slowly travel by surface flow to Arcade Creek. Development has covered much of the ground, so that stormwater now flows quickly into stormdrains, and then into the creek channel. Drainage from the area south of Auburn Boulevard, between Watt and Norris Avenues, enters Arcade Creek via a culvert under Auburn Boulevard near Norris Avenue (Norris Tributary). Flows into Norris Tributary are comprised of water from garden and lawn watering, runoff from rainfall, leakage from water mains and sewers, and groundwater interception. Some water in the tributary and the creek is absorbed into the stream embankments and surrounding vegetation.<sup>21</sup>

During storm events, the creek also spills over into the lawn area of the western portion of the park, and will periodically inundate the portion of Park Road near Auburn Boulevard.

Portions of Arcade Creek have been subject to flash flood conditions because of channel incision and a loss of soil along the banks. A detention basin and filtration project was constructed on the south side of Arcade Creek within the nature area of Del Paso Regional Park. The facility provides storage for storm flows and a wetland designed to filtrate water to improve water quality.<sup>22</sup>

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20. City of Sacramento, *Sacramento Entertainment and Sports Center & Related Development Draft Environmental Impact Report*, December 2013, page 4.7-16 and 4.7-17.

21. City of Sacramento, *Revised Initial Study/Negative Declaration, Del Paso Regional Park Detention and Filtration Wetland Project*, February 2005, page 5.

22. City of Sacramento, *Revised Initial Study/Negative Declaration, Del Paso Regional Park Detention and Filtration Wetland Project*, February 2005, page 6.

A portion of the project site is located in Zone AE, representing the 100-year floodplain of Arcade Creek.<sup>23</sup>

The project site drains overland to the creek or into ditches and culverts that drain to the creek. There are no storm drain facilities in the project site or Park Road, except for ditches along some residential frontages that connect to ditches and culverts that drain to Arcade Creek.

## STANDARDS OF SIGNIFICANCE

For purposes of this Initial Study, impacts to hydrology and water quality may be considered significant if construction and/or implementation of the proposed Project would result in the following impacts that remain significant after implementation of General Plan policies or mitigation from the General Plan MEIR:

- substantially degrade water quality and violate any water quality objectives set by the State Water Resources Control Board, due to increases in sediments and other contaminants generated by construction and/or development of the Specific Plan; or
- substantially increase the exposure of people and/or property to the risk of injury and damage in the event of a 100-year flood.

## SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MASTER EIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

Chapter 4.7 of the Master EIR evaluates the potential effects of the 2035 General Plan as they relate to surface water, groundwater, flooding, stormwater and water quality. Potential effects include water quality degradation due to construction activities and operation (Impacts 4.7-1, 4.7-2), and exposure of people to flood risks (Impacts 4.7-3). Policies included in the 2035 General Plan, including a directive for regional planning and cooperation (EC 2.1.1, EC 2.1.2), pursuit of 200-year flood protection (Policies EC 2.1.4 and 2.1.5), levee, floodplain and flood facility improvement and management (Policies EC 2.1.3, 2.1.6, 2.1.7, 2.1.8, 2.1.9, 2.1.13 through 2.1.16) and land use planning for flood protection (EC 2.1.10 through 2.1.12) were among the policies that reduced flood impacts to a less-than-significant level. Water quality impacts would be lessened to a less-than-significant level by Policies ER 1.1.1 through 1.1.10, which address regional planning, conservation of open space, stormwater protection measures, groundwater recharge, limiting peak storm flows, and watershed education.

## MITIGATION MEASURES FROM 2035 GENERAL PLAN MASTER EIR THAT APPLY TO THE PROJECT

The following policy that would lessen the impact of the proposed Project on water quality:

**ER 1.1.7 Construction Site Impacts.** The City shall minimize disturbances of natural water bodies and natural drainage systems caused by development, implement measures to protect areas from erosion and sediment loss, and continue to require construction contractors to comply with the City's erosion and sediment control ordinance and stormwater management and discharge control ordinance.

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23. Federal Emergency Management Agency, *Flood Insurance Rate Map (FIRM), Sacramento County, California, and Incorporated Areas, Panel 88 of 705, Map Number 06067C0088H*, August 16, 2012.



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## ANSWERS TO CHECKLIST QUESTIONS

### A. Water Quality

Construction activities have the potential to degrade water quality. The removal of vegetation and grading would expose soils to potential erosion, although the area to be graded would be small (less than 1 acre) and shallow. If construction equipment were to leak oil, gasoline and/or diesel fuel, the contaminants could be washed into stormwater. Because runoff from the project site flows overland to the creek, exposed contaminants and/or soils could enter the creek via stormwater runoff, which would degrade water quality in the creek. The proposed Project is planned to be constructed within the dry season, which would minimize the potential for stormwater runoff to be affected by construction activities.

The proposed Project must prepare an erosion control plan in compliance with the City's Land, Grading and Sediment Erosion Control Ordinance, which would ensure that soils and any leaked contaminants from cleared and graded areas are properly contained within the site. Sediment and control measures for the project include placement of inlet filter bags around any existing drainage structures, berming and fencing around construction storage areas, and replanting of exposed soils with native vegetation.<sup>24</sup> The erosion control plan would protect water quality and ensure compliance with General Plan Policy ER 1.1.7.

After the project is constructed, the widened path and picnic area would be stable, so they would not be subjected to erosion. Further, there would be no fuels or other contaminants used or stored within the project site, with the exception of landscape maintenance equipment when the site is mowed.

For the above reasons, the proposed Project would have a ***less-than-significant impact*** on water quality.

### B. Flooding

As stated above, a portion of the project site is located within the 100-year floodplain for Arcade Creek. The proposed Project would not construct any residences or other structures, so the project would not impede flood flows. The proposed Project would not in and of itself substantially increase the number of people who use Del Paso Regional Park, but could increase the amount of time people spend in the project area, particularly at the picnic tables. However, these facilities are unlikely to be used during storms. For these reasons, the proposed Project would not substantially increase the risk of exposure to flood hazards, so the impact would be ***less than significant***.

## MITIGATION MEASURES

None required.

## FINDINGS

The project would have no additional project-specific environmental effects relating to Hydrology

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24 City of Sacramento, Parks and Recreation, Landscape Architecture Division, Construction Plans for Del Paso Park Multi-use Trail, 75 percent, October 2014.

and Water Quality.

Issues:	Effect will be studied in the EIR	Effect can be mitigated to less than significant	No additional significant environmental effect
<p>8. <u>NOISE</u></p> <p>Would the project:</p> <p>A) Result in exterior noise levels in the project area that are above the upper value of the normally acceptable category for various land uses due to the project's noise level increases?</p>			X
<p>B) Result in residential interior noise levels of 45 dBA L<sub>dn</sub> or greater caused by noise level increases due to the project?</p>			X
<p>C) Result in construction noise levels that exceed the standards in the City of Sacramento Noise Ordinance?</p>			X
<p>D) Permit existing and/or planned residential and commercial areas to be exposed to vibration-peak-particle velocities greater than 0.5 inches per second due to project construction?</p>			X
<p>E) Permit adjacent residential and commercial areas to be exposed to vibration peak particle velocities greater than 0.5 inches per second due to highway traffic and rail operations?</p>			X
<p>F) Permit historic buildings and archaeological sites to be exposed to vibration-peak-particle velocities greater than 0.2 inches per second due to project construction and highway traffic?</p>			X

**ENVIRONMENTAL SETTING**

The project site is relatively quiet due to its location within a park surrounded by residential development. The primary source of noise is traffic on the Interstate 80/Auburn Boulevard off-ramp and Auburn Boulevard adjacent to the park. Intermittent noise sources include landscape maintenance equipment and amplified events at the ball fields and a local community center.

The closest noise-sensitive receptors are four residences located north of the project site, along Park Road. These are rural residences on large lots, and with large front yards and homes facing the street. The houses are approximately 150 to 200 feet from the project site.

The City General Plan states that the normally acceptable noise level for playgrounds and neighborhood parks is 70 dBA Community Noise Equivalent Level (CNEL). According to the Master EIR, the distance to the 70 CNEL for Auburn Boulevard adjacent to Del Paso Park would be 39 feet from the centerline (at buildout of the General Plan), which is located close to the roadway right-of-way.<sup>25</sup> Therefore, the noise levels at the park, including the project site, would be considered acceptable.

The City of Sacramento noise ordinance states that exterior noise limits in residential and agricultural areas shall not exceed 55 dBA between 7 a.m. and 10 p.m. and 50 dBA between 10:00 p.m. and 7:00a.m. [City Code Section 8.68.060(A)]. The ordinance further states that internal combustion engines in use on construction sites must be equipped with "suitable exhaust and intake silencers that are in good working order." [City Code Section 8.68.080(D)]. The ordinance does not address noise levels in City parks.

Tree and park maintenance activities conducted by the City Parks Department are also exempt from the Noise Ordinance standards [Section 8.68.080(H)].

### STANDARDS OF SIGNIFICANCE

For purposes of this Initial Study, impacts due to noise may be considered significant if construction and/or implementation of the proposed Project would result in the following impacts that remain significant after implementation of General Plan policies or mitigation from the General Plan MEIR:

- result in exterior noise levels in the project area that are above the upper value of the normally acceptable category for various land uses due to the project's noise level increases;
- result in residential interior noise levels of 45 dBA  $L_{dn}$  or greater caused by noise level increases due to the project;
- result in construction noise levels that exceed the standards in the City of Sacramento Noise Ordinance;
- permit existing and/or planned residential and commercial areas to be exposed to vibration-peak-particle velocities greater than 0.5 inches per second due to project construction;
- permit adjacent residential and commercial areas to be exposed to vibration peak particle velocities greater than 0.5 inches per second due to highway traffic and rail operations; or
- permit historic buildings and archaeological sites to be exposed to vibration-peak-particle velocities greater than 0.2 inches per second due to project construction and highway traffic.

### SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MASTER EIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

The Master EIR evaluated the potential for development under the 2035 General Plan to increase noise levels in the community (see Chapter 4.8). New noise sources would include

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25. City of Sacramento, *Sacramento 2035 General Plan Master Environmental Impact Report*, August 11, 2014, Table 4.8-4.

vehicular traffic, aircraft, railways, light rail and stationary sources. The General Plan policies establish exterior (Policies EC 3.1.1 and EC 3.1.2) and interior (EC 3.1.3) noise standards for noise-sensitive uses. A variety of policies provide standards for the types of development envisioned in the General Plan. For example, Policy EC 3.1.8 requires new mixed-use, commercial and industrial development to mitigate the effects of noise from operations on adjoining sensitive land use. Policy 3.1.9 calls for the City to limit hours of operations for parks and active recreation areas to minimize disturbance to nearby residences. Notwithstanding application of the General Plan policies, noise impacts for exterior noise levels (Impact 4.8-1) and interior noise levels (Impact 4.8-2), and construction vibration impacts (Impact 4.8-4) were found to be significant and unavoidable. Construction noise impacts would be reduced to less-than-significant levels with implementation of the City's noise ordinance, and Policy EC 3.1.10, which requires development projects to assess and minimize the potential construction noise impacts on nearby sensitive uses (Impact 4.8-3). Exposure to vibration from transportation facilities would be less than significant with Policy 3.1.6 and 3.1.7, which require that the effects of vibration of these facilities be evaluated and mitigated as needed.

One noise policy specifically addresses parks:

**EC 3.1.9** Compatibility with Park and Recreation Uses: The City shall limit the hours of operation for parks and active recreation areas in residential areas to minimize disturbance to residences.

#### MITIGATION MEASURES FROM 2035 GENERAL PLAN MASTER EIR THAT APPLY TO THE PROJECT

None.

#### ANSWERS TO CHECKLIST QUESTIONS

##### A. and B. Long-term Interior and Exterior Noise Levels

As discussed above, the primary source of noise in the project vicinity comes from area traffic. The proposed Project does not include residential, commercial or other uses that would substantially increase traffic noise. The proposed Project does not include any parking, so it would not increase the number of cars in the immediate vicinity. As part of a nature area, the proposed Project would not host recreational activities that generate substantial noise, such as concerts or ball games. The project site is not planted in lawn or ornamental shrubs, so the only ongoing landscape maintenance is periodic mowing. This regimen would be unaffected by the proposed Project. For these reasons, there would be **no impact** on long-term noise levels, and the proposed Project would be consistent with General Plan policy EC 3.1.9.

##### C. Construction Noise

Construction of the proposed Project would generate noise, primarily from heavy equipment and construction worker vehicles. Construction activities would include vegetation removal, grading, cement pouring, and installation of the trail surface and picnic tables. No deep excavation would be required. Because the project is small, only a couple of pieces of major equipment (e.g., grader, cement mixer) would be operating at one time, and the total duration for construction would be short. The noise from construction equipment would vary from house to house as the equipment progressed along the 1,400 feet of trail. Although nearby residences are set back from the project site, at various times, residents adjacent to Park Road near the project site would be able to hear construction equipment noise. People using the park and/or trails would also be able to hear equipment noise, particularly near the project site. There are

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several horse properties, including a private arena and a boarding stable, immediately north of the project site. However, project construction would comply with the City's noise ordinance, so construction noise would occur only during the day when traffic ambient noise levels are higher and residents are less likely to be engaged in activities that require quiet, such as sleeping or watching TV. The proposed Project would not alter park hours. For these reasons, the impacts from construction noise would be ***less than significant***.

#### D., E., and F. Vibration

Vibration from certain construction activities, such as pile driving, can disturb people and damage buildings. Project construction would not require deep excavation, blasting, pile driving or other activities that would generate enough vibration to disturb nearby residents and/or damage buildings, which are located approximately 150 feet or more from the project site. Therefore, there would be ***no impact*** due to vibration.

#### **MITIGATION MEASURES**

None required.

#### **Findings**

The project would have no additional project-specific environmental effects relating to Noise.

Issues:	Effect will be studied in the EIR	Effect can be mitigated to less than significant	No additional significant environmental effect
<p><u>9. PUBLIC SERVICES</u></p> <p>Would the project result in the need for new or altered services related to fire protection, police protection, school facilities, or other governmental services beyond what was anticipated in the 2035 General Plan?</p>			X

**ENVIRONMENTAL SETTING**

The City of Sacramento provides law enforcement services within the City, including the project site. Del Paso Regional Park is located in the North command area.

The City of Sacramento Fire Department provides fire protection and emergency medical services to the City. Del Paso Regional Park, including the project site, is located within the first response zone of Fire Station 19, which is located at 1700 Challenge Drive. The closest station to project site is Metro Fire Station 103 on Watt Avenue, which serves the County. The City has a mutual aid agreement with Metro Fire as well as other fire protection districts in the region.

The area surrounding the project site is mainly served by the San Juan Unified School District with the area to the west served by the Del Paso Heights School District.

**STANDARDS OF SIGNIFICANCE**

For the purposes of this Initial Study, an impact would be considered significant if the project resulted in the need for new or altered services related to fire protection, police protection, school facilities, or other governmental services beyond what was anticipated in the 2035 General Plan.

**SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MASTER EIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS**

The Master EIR evaluated the potential effects of the 2035 General Plan on various public services. These include parks (Chapter 4.9) and police, fire protection, schools, libraries and emergency services (Chapter 4.10).

The General Plan provides that adequate staffing levels for police and fire are important for the long-term health, safety and well-being of the community (Goal PHS 1.1, PHS 2.1). The Master EIR concluded that effects on these services would be less than significant (Impacts 4.10-1 and 4.10-2) with implementation of public health and safety policies regarding the provision of these services.

General Plan policies that call for the City to consider impacts of new development on schools (see, for example, Policy ERC 1.1.2 setting forth locational criteria, and Policy ERC 1.1.4 that

encourages joint-use development of facilities) reduced impacts on schools to a less-than-significant level (Impacts 4.19-3 and 4.10-4). Impacts on library facilities were also considered less than significant (Impact 4.10-5). Impacts on emergency response facilities were also found to be less than significant with implementation of General Plan policies (Impact 4.10-6).

#### **MITIGATION MEASURES FROM 2035 GENERAL PLAN MASTER EIR THAT APPLY TO THE PROJECT**

None.

#### **ANSWERS TO CHECKLIST QUESTIONS**

##### A. Public Services

The proposed Project does not include any residential or other uses that would increase demand for fire protection, law enforcement, schools or other public services. As part of the Del Paso Regional Park, the project site is already served by police and fire departments. The proposed Project would improve amenities within the park, but would not increase park capacity or attract substantial numbers of people. Therefore, the proposed Project would have ***no impact*** on public services.

#### **MITIGATION MEASURES**

None required.

#### **FINDINGS**

The project would have no additional project-specific environmental effects relating to Public Services.



Issues:	Effect will be studied in the EIR	Effect can be mitigated to less than significant	No additional significant environmental effect
<p>10. <u>RECREATION</u> Would the project:</p> <p>A) Cause or accelerate substantial physical deterioration of existing area parks or recreational facilities?</p>			X
<p>B) Create a need for construction or expansion of recreational facilities beyond what was anticipated in the 2035 General Plan?</p>			X

**ENVIRONMENTAL SETTING**

The City of Sacramento Parks and Recreation Department manages parks and recreational facilities within the City of Sacramento. The City has 222 parks and parkways containing a total of almost 3,200 acres. There are three types of parks within the City:

- 1) neighborhood parks, which range in size from 2 to 10 acres, and serve a ½ mile radius;
- 2) community parks, which range in size from 6 to 60 acres, serve a 3-mile radius or several neighborhoods, and may contain lighted sports fields or courts, skate parks, dog parks, nature areas, and off-street parking and restrooms; and,
- 3) regional parks, typically 75 to 200 acres that serve the entire City and beyond, and may contain similar facilities to community parks as well as sports complexes, large scale picnic areas, golf courses or other region-wide attractions.<sup>26</sup>

The project site is located within the 680-acre Del Paso Regional Park, which is classified as a regional park. The park contains a variety of park and recreational facilities, including pedestrian and equestrian trails, natural habitat areas, lighted ball fields, restrooms, Sacramento Horsemen’s Association, picnic areas two children’s play areas, the Discovery Museum Science and Space Center, three golf course, two food vendors, Renfree Baseball Field, the Sacramento Softball Complex and the Longview Oaks Natural Habitat Area.

**STANDARDS OF SIGNIFICANCE**

For purposes of this Initial Study, impacts to recreational resources are considered significant if the proposed Project would do either of the following:

- cause or accelerate substantial physical deterioration of existing area parks or recreational facilities; or
- create a need for construction or expansion of recreational facilities beyond what was anticipated in the 2035 General Plan.

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26. City of Sacramento website (cityofsacramento.org), Parks.

**SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MASTER EIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS**

Impacts on parks and recreation were found to be less than significant (see Impacts 4.9-1 and 4.9-2) due to Quimby Act and City Code requirements that new development offset its demand for those facilities, and General Plan Policies ERC 2.2.1 (maintaining the Parks and Recreation Master Plan), Policies ERC 2.1 through 2.2.8, 2.2.11, 2.2.16 through 2.2.18 (ensuring planning for and provision of parks and related facilities), ERC 2.4.1 (service levels for trails), and ERC 2.4.2, 2.5.1 and 2.5.4 (access, planning and maintenance of waterways and parkways).

**MITIGATION MEASURES FROM 2035 GENERAL PLAN MASTER EIR THAT APPLY TO THE PROJECT**

None required.

**ANSWERS TO CHECKLIST QUESTIONS**

A. and B. Deterioration and/or Expansion of Parks and Recreation

The proposed Project does not include any residential or other uses that would increase the demand for parks and recreational facilities. The proposed Project would make improvements within an existing park by widening 1,400 linear feet of a trail and installing picnic tables. These improvements are consistent with the 1985 Master Plan for the park, so they would have been anticipated in the 2035 General Plan. As discussed throughout this Initial Study, the environmental effects of the proposed Project have been addressed in the Master EIR or, in some cases, can be lessened to a less-than-significant level by mitigation measures identified herein. For these reasons, the proposed Project would have a ***less-than-significant impact*** on parks and recreation facilities.

**MITIGATION MEASURES**

No project-specific mitigation measures are required.

**FINDINGS**

The project would have no additional project-specific environmental effects relating to Recreation.

Issues:	Effect remains significant with all identified mitigation	Effect can be mitigated to less than significant	No additional significant environmental effect
<p>11. <u>TRANSPORTATION AND CIRCULATION</u> Would the project:</p>			
<p>A) Roadway segments: degrade peak period Level of Service (LOS) from A,B,C or D (without the project) to E or F (with project) or the LOS (without project) is E or F, and project generated traffic increases the Volume to Capacity Ratio (V/C ratio) by 0.02 or more.</p>			X
<p>B) Intersections: degrade peak period level of service from A, B, C or D (without project) to E or F (with project) or the LOS (without project) is E or F, and project generated traffic increases the peak period average vehicle delay by five seconds or more.?</p>			X
<p>C) Freeway facilities: off-ramps with vehicle queues that extend into the ramp's deceleration area or onto the freeway; project traffic increases that cause any ramp's merge/diverge level of service to be worse than the freeway's level of service; project traffic increases that cause the freeway level of service to deteriorate beyond level of service threshold defined in the Caltrans Route Concept Report for the facility; or the expected ramp queue is greater than the storage capacity?</p>			X
<p>D) Transit: adversely affect public transit operations or fail to adequately provide for access to public?</p>			X
<p>E) Bicycle facilities: adversely affect bicycle travel, bicycle paths or fail to adequately provide for access by bicycle?</p>			X
<p>F) Pedestrian: adversely affect pedestrian travel, pedestrian paths or fail to adequately provide for access by pedestrians?</p>			X

**ENVIRONMENTAL SETTING**

The eastern portion of Del Paso Regional Park is accessed primarily from Auburn Boulevard, which runs along the park's southern boundary (see Figure 2). Park Road runs along the northern boundary of the park (in the western portion).

Auburn Boulevard is classified as a major collector in the 2035 General Plan<sup>27</sup>. In the vicinity of the project, it is a 4-lane road. Auburn Boulevard between Watt Avenue and the freeway on-ramps carries approximately 18,800 trips per day, and operates at an acceptable level of service<sup>28</sup>. This segment is project to carry 20,400 average daily trips (ADT) and operate at Level of Service D or better at buildout of the 2035 GP.<sup>29</sup>

Park Road is a two-lane road without sidewalks, curbs or gutters that provides access to the park and local residential development. Park Road dead ends at the eastern terminus where it is cut off by the freeway. Bridge Street provides a second access between Park Road and Auburn Boulevard, and is the primary access point for the softball field. There are no through connections to other areas of the City or county. Consequently, Park Road carries relatively small amounts of traffic and is also used by pedestrians.

There are no bike lanes on Auburn Boulevard in the vicinity of the project site, nor on Park Road. The Sacramento Bikeway Master Plan proposes on-street bike paths on Auburn Boulevard between Watt Avenue and the Interstate 80 on-ramp near the project site.<sup>30</sup> There is a sidewalk on the southern side of Auburn Boulevard between Winding Way and the Interstate 80 on/off-ramp.

Regional Transit (RT) operates bus service along Auburn Boulevard, with several bus stops in proximity to Del Paso Regional Park. There is no bus service on Park Road or Bridge Street. A light rail station is located approximately one-half mile northwest of the park.

## STANDARDS OF SIGNIFICANCE

For purposes of this Initial Study, impacts resulting from changes in transportation or circulation may be considered significant if construction and/or implementation of the proposed Project would result in the following impacts that remain significant after implementation of General Plan policies or mitigation from the General Plan MEIR:

### Roadway Segments

- the traffic generated by a project degrades peak period Level of Service (LOS) from A,B,C or D (without the project) to E or F (with project); or
- the LOS (without project) is E or F, and project generated traffic increases the Volume to Capacity Ratio (V/C ratio) by 0.02 or more.

### Intersections

- the traffic generated by a project degrades peak period level of service from A, B, C or D (without project) to E or F (with project) or

27. City of Sacramento, *Sacramento 2035 General Plan Master Environmental Impact Report*, August 2014, Exhibit 4.12-1.

28. City of Sacramento, *Sacramento 2035 General Plan Master Background Report*, August 2014, Figure 3-2.

29. City of Sacramento, *Sacramento 2035 General Plan Master Environmental Impact Report*, August 2014, Exhibit 4.12-3.

30. Bikeway Master Plan Map, updated March 24, 2015, [portal.cityofsacramento.org/publicworks/transportation/programs&services/bikewayprogram](http://portal.cityofsacramento.org/publicworks/transportation/programs&services/bikewayprogram), accessed May 17, 2015.

- the LOS (without project) is E or F, and project generated traffic increases the peak hour average vehicle delay by five seconds or more.

### **Freeway Facilities**

- off-ramps with vehicle queues that extend into the ramp's deceleration area or onto the freeway;
- project traffic increases that cause any ramp's merge/diverge level of service to be worse than the freeway's level of service;
- project traffic increases that cause the freeway level of service to deteriorate beyond level of service threshold defined in the Caltrans Route Concept Report for the facility; or
- the expected ramp queue is greater than the storage capacity.

### **Transit**

- adversely affect public transit operations or
- fail to adequately provide for access to public transit.

### **Bicycle Facilities**

- adversely affect bicycle travel, bicycle paths or
- fail to adequately provide for access by bicycle.

### **Pedestrian Circulation**

- adversely affect pedestrian travel, pedestrian paths or
- fail to adequately provide for access by pedestrians.

## **SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MASTER EIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS**

Transportation and circulation were discussed in the Master EIR in Chapter 4.12. Various modes of travel were included in the analysis, including vehicular, transit, bicycle, pedestrian and aviation components. The analysis included consideration of roadway capacity and identification of levels of service, and effects of the 2035 General Plan on the public transportation system. Provisions of the 2035 General Plan that provide substantial guidance include Goal Mobility 1.1, calling for a transportation system that is effectively planned, managed, operated and maintained, promotion of multimodal choices (Policy M 1.2.1), identification of level of service standards (Policy M 1.2.2), support for expansion of Caltrans facilities consistent with the SACOG MTP/SCS (Policy M 1.5.6) and development of complete streets (Goal M 4.2).

The Master EIR concluded that most traffic impacts would be less than significant with implementation of General Plan policies. However, impacts on freeway segments (Impact 4.12-4) and impacts on roadway segments (Impact 4.12-3) in adjacent jurisdictions were found to be significant and unavoidable.

According to Policy M1.2.2, the identified level of service for streets within the City that are in proximity to the project site is LOS D or better during peak hour conditions.

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**MITIGATION MEASURES FROM 2035 GENERAL PLAN MASTER EIR THAT APPLY TO THE PROJECT**

None.

**ANSWERS TO CHECKLIST QUESTIONS**

A., Roadway Segments, B., Intersections, and C., Freeway Facilities

During construction, construction equipment and employees would travel to the project site. However, the project is a small size improvement project, so the number of trips would be limited, and the duration of construction would be less than 2 months.

After construction, the project would not increase vehicular traffic over existing conditions. The proposed Project would not create any new facilities to attract a new population to the park. The project site is accessed on foot, bicycle or horseback, and there is no parking in the project vicinity. Therefore, it is not expected that more people would drive to the project site to use the expanded trail and picnic tables.

For these reasons, the impact on roadways, intersections and the freeways would be ***less than significant***.

D. Transit

The proposed Project would not in and of itself generate substantial additional transit demand. People traveling to the park to use existing facilities may travel on foot to the project site, but would be unlikely to travel to the park just to use the newly widened trail and/or picnic tables. The proposed Project would not interfere with existing or future transit services, because it is not adjacent to a street with a transit line. For these reasons, ***no impact*** would occur on transit services.

E. Bicycle and F. Pedestrian

The proposed Project would improve 1,400 feet of the nature trail, which would be a benefit for pedestrians, bicyclists and equestrians. This portion of the trail would be closed during construction, but the closure would be for a limited time. Pedestrians and bicyclists using the trail to travel to or from the park area to the southwest would need to use Park Road during construction, a two-lane road without sidewalks but with low traffic volumes. Once constructed, the proposed Project would benefit for pedestrians and equestrians by providing a wider trail and picnic tables. For these reasons, the impact on pedestrian and bicycle circulation would be ***less than significant***.

**MITIGATION MEASURES**

No Project-specific mitigation measures are required.

**FINDINGS**

The project would have no additional project-specific environmental effects relating to Transportation and Circulation.

Issues:	Effect will be studied in the EIR	Effect can be mitigated to less than significant	No additional significant environmental effect
<p>12. <u>UTILITIES AND SERVICE SYSTEMS</u></p> <p>Would the project:</p> <p>A) Result in the determination that adequate capacity is not available to serve the project's demand in addition to existing commitments?</p>			X
<p>B) Require or result in either the construction of new utilities or the expansion of existing utilities, the construction of which could cause significant environmental impacts?</p>			X

**ENVIRONMENTAL SETTING**

The City of Sacramento provides domestic water service to Del Paso Regional Park and surrounding area. The City obtains water from the American and Sacramento Rivers and groundwater wells. The project site overlies the North American Groundwater Basin. There are water lines within the Park Road right-of-way adjacent to the project site.

Wastewater in the City of Sacramento is treated by the Sacramento Regional County Sanitation District (SRCSD) at its regional plant, located in South Sacramento area. The project site is located within the Sacramento Area Sewer District (formerly County Services District [CSD] 1), which collects and conveys wastewater to the treatment plant. Sewer lines are located within the Park Road right-of-way. These sewer lines are separate from storm drainage facilities.

Commercial and residential solid waste within the city is collected by the City. Commercial solid waste is taken to the Sacramento Recycling and Transfer station and the North Area Transfer Station, and then transferred to the Lockwood Regional Landfill located in Sparks, Nevada. Residential and municipal solid waste is taken to the North Area Recovery Station for processing and then transported to the Sacramento County (Kiefer) Landfill. The Kiefer Landfill has enough capacity to collect waste from its service area until 2065.<sup>31</sup>

Electrical service in the City of Sacramento is provided by the Sacramento Municipal Utilities District (SMUD). Natural gas is provided by Pacific Gas & Electric (PG&E). There are above-ground electrical lines along Park Drive. Gas lines are located within the Park Road right-of-way.

There are no water fountains, restrooms, lights or other facilities connected to water, wastewater, or electrical or gas lines.

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31. City of Sacramento, *Sacramento 2030 General Plan Background Report*, August 2014, page 4-45.

Runoff from the project area flows overland or by ditch and/or culvert to Arcade Creek. Portions of the developed areas along Park Road have ditches, which discharge to Arcade Creek through the nature area. There is no storm drain system within the Park Road.

### STANDARDS OF SIGNIFICANCE

For the purposes of this Initial Study, an impact would be considered significant if the project resulted in the need for new or altered services related to water, wastewater, storm drainage, solid waste or dry utilities beyond what was anticipated in the 2035 General Plan:

- result in the determination that adequate capacity is not available to serve the project's demand in addition to existing commitments; or
- require or result in either the construction of new utilities or the expansion of existing utilities, the construction of which could cause significant environmental impacts.

### SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MASTER EIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS

The Master EIR evaluated the effects of development under the 2035 General Plan on water supply, sewer and storm drainage, solid waste, electricity, natural gas and telecommunications. See Chapter 4.11.

The Master EIR evaluated the impacts of increased demand for water that would occur with development under the 2035 General Plan. Policies in the General Plan would lessen the impacts on water supply, but the increased demand and need for new water facilities would remain significant and unavoidable impacts (Impacts 4.11-1 and 4.11-2). The potential need for expansion of wastewater and stormwater drainage conveyance facilities was found to be less than significant (Impacts 4.11-3), as was the need to expand wastewater treatment facilities (Impact 4.11-4). Impacts on solid waste facilities were less than significant (Impact 4.11-5). Implementation of energy efficient standards as set forth in Titles 20 and 24 of the California Code of Regulations for residential and non-residential buildings and General Plan Policies U6.1.1 through 6.1.17 would reduce effects for energy to a less-than-significant level (Impact 4.11-6).

### MITIGATION MEASURES FROM 2035 GENERAL PLAN MASTER EIR THAT APPLY TO THE PROJECT

None available for water supply; none required for other utilities.

### ANSWERS TO CHECKLIST QUESTIONS

#### A. and B. (Utility Service Capacity)

The proposed Project would not provide drinking fountains, restrooms, lighting or other facilities that require connection to water, sewer, electrical or gas lines. The project area would continue to drain overland or by ditch/culvert to Arcade Creek. There would be a small amount of impervious surface created for the picnic table pads, but storm water would flow onto the adjacent ground and either be absorbed or flow to the creek. Therefore, the proposed Project would not increase the demand for any utilities, and would not require the extension or expansion of generation, treatment or conveyance facilities. **No impact** would occur.



**MITIGATION MEASURES**

None required.

**FINDINGS**

The project would have no additional project-specific environmental effects relating to Utilities and Service Systems.

**MANDATORY FINDINGS OF SIGNIFICANCE**

Issues:	Effect remains significant with all identified mitigation	Effect can be mitigated to less than significant	No additional significant environmental effect
<b>13. MANDATORY FINDINGS OF SIGNIFICANCE</b>			
A) Does the project 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?		X	
B) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)		X	
C) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		X	

**Answers to Checklist Questions**

A. Plants and Wildlife and Historic Resources

As discussed in Item 3, Biological Resources, the project site does provide habitat for several special-status plant and wildlife species. Mitigation is identified to ensure that any impacts on special-status species are less than significant. As discussed in Item 4, Cultural Resources, there are no structures on the site and the site has low sensitivity for archaeological resources. Mitigation Measure CUL-1 would protect any subsurface historic or prehistoric cultural resources, if present, that are encountered during construction. These measures would reduce impacts on biological and cultural resources to a less-than-significant level, so this impact would be ***less than significant level***.

B. Cumulative Impacts

As discussed in Items 1 through 12 with implementation of applicable General Plan policies,

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required regulation and ordinances, and the mitigation measures previously identified herein and, the proposed Project would not substantially contribute to cumulative impacts and/or cause the cumulative impacts of the 2035 General Plan EIR to exceed the levels described in the Master EIR. Therefore, this is an impact that is ***less than significant***.

#### C. Adverse Effects on Human Beings

As discussed in Item 6, Hazards, it is not expected that contaminated soils would be located on site, but if they are discovered, Mitigation Measure HAZ-1 would ensure that park users and construction workers would be protected from exposure to contamination. In addition, General Plan policies and mitigation measures identified in Item 2, Air Quality, and Item 8, Noise, would protect residents from air emissions and noise. For these reasons, this is an impact that is ***less than significant with mitigation incorporated***.

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## **SECTION IV - ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED**

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The environmental factors checked below would potentially be affected by this project.

- |  |   |
|--|---|
| <input type="checkbox"/> Aesthetics                      | <input checked="" type="checkbox"/> Hydrology and Water Quality |
| <input checked="" type="checkbox"/> Air Quality          | <input checked="" type="checkbox"/> Noise                       |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Public Services             |
| <input checked="" type="checkbox"/> Cultural Resources   | <input checked="" type="checkbox"/> Recreation                  |
| <input type="checkbox"/> Energy and Mineral Resources    | <input checked="" type="checkbox"/> Transportation/Circulation  |
| <input checked="" type="checkbox"/> Geology and Soils    | <input type="checkbox"/> Utilities and Service Systems          |
| <input checked="" type="checkbox"/> Hazards              |   |
| <input type="checkbox"/> None Identified                 |   |

## SECTION V - DETERMINATION

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**On the basis of the Initial Study:**

— I find that (a) the proposed Project is an anticipated subsequent project identified and described in the 2035 General Plan Master EIR; (b) the proposed Project is consistent with the 2035 General Plan land use designation and the permissible densities and intensities of use for the project site; and (c) the proposed Project will not have any project-specific additional significant environmental effects not previously examined in the Master EIR, and no new mitigation measures or alternatives will be required. Mitigation measures from the Master EIR will be applied to the proposed Project as appropriate. Notice shall be provided pursuant to CEQA Guidelines Section 15087. (CEQA Guidelines Section 15177(b))

X I find that (a) the proposed Project is an anticipated subsequent project identified and described in the 2035 General Plan Master EIR; (b) the proposed Project is consistent with the 2035 General Plan land use designation and the permissible densities and intensities of use for the project site; (c) that the discussions of cumulative impacts, growth inducing impacts, and irreversible significant effects in the Master EIR are adequate for the proposed Project; and (d) the proposed Project will have additional significant environmental effects not previously examined in the Master EIR. A Mitigated Negative Declaration will be prepared. Mitigation measures from the Master EIR will be applied to the project as appropriate, and additional feasible mitigation measures and alternatives will be incorporated to revise the proposed Project before the negative declaration is circulated for public review, to avoid or mitigate the identified effects to a level of insignificance. (CEQA Guidelines Section 15178(b))

— I find that (a) the proposed Project is an anticipated subsequent project identified and described in the 2035 General Plan Master EIR; (b) the proposed is consistent with the 2035 General Plan land use designation and the permissible densities and intensities of use for the project site; (c) that the discussions of cumulative impacts, growth inducing impacts, and irreversible significant effects in the Master EIR are adequate for the proposed Project; and (d) the proposed Project **will** have additional significant environmental effects not previously examined in the Master EIR. A focused EIR shall be prepared which shall incorporate by reference the Master EIR and analyze only the project-specific significant environmental effects and any new or additional mitigation measures or alternatives that were not identified and analyzed in the Master EIR. Mitigation measures from the Master EIR will be applied to the project as appropriate. (CEQA Guidelines Section 15178(c))

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\_\_\_ I find that (a) the proposed Project is an anticipated subsequent project identified and described in the 2035 General Plan Master EIR; (b) the proposed Project is consistent with the 2035 General Plan land use designation and the permissible densities and intensities of use for the project site; (c) that the discussions of cumulative impacts, growth inducing impacts, and irreversible significant effects in the Master EIR are not adequate for the proposed Project; and (d) the proposed Project will have additional significant environmental effects not previously examined in the Master EIR. An EIR shall be prepared, which shall tier off of the Master EIR to the extent feasible. (CEQA Guidelines Section 15178(e))

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Signature

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Date

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Printed Name

## REFERENCES CITED

Bumgardner Biological Consulting, *Del Paso Regional Park Trail Improvements, Biological Resources Evaluation, Sacramento, California*, January 2015.

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**Appendix A**  
**Climate Action Plan Checklist**

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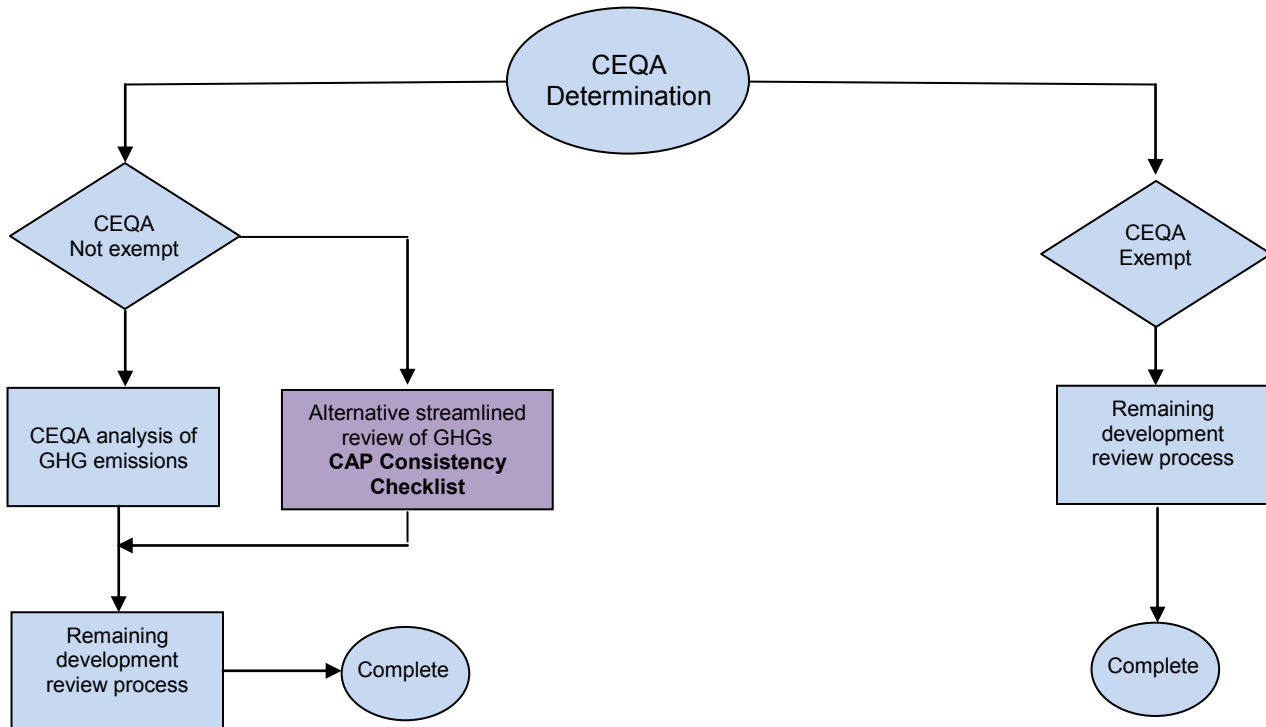
## CLIMATE ACTION PLAN – CONSISTENCY REVIEW CHECKLIST

The purpose of the Climate Action Plan Consistency Review Checklist (CAP Consistency Review Checklist) is to provide a streamlined review process for proposed new development projects which are subject to discretionary review and trigger environmental review pursuant to the California Environmental Quality Act (CEQA)..

CEQA Guidelines require the analysis of greenhouse gas (GHG) emissions and potential climate change impacts from new development. The Sacramento Climate Action Plan qualifies under section 15183.5 of the CEQA Guidelines as a plan for the reduction of GHG emissions for use in cumulative impact analysis pertaining to development projects. This allows projects that demonstrate consistency with the CAP to be eligible for this streamlining procedure. Projects that demonstrate consistency with the CAP and the Sacramento 2030 General Plan may be able to answer “No additional significant environmental effect” in the City’s initial study checklist. Projects that do not demonstrate consistency may, at the City’s discretion, prepare a more comprehensive project-specific analysis of GHG emissions consistent with CEQA requirements. (See FAQ about the CAP Consistency Review Checklist for more details.)

The diagram below shows the context for the CAP Consistency Review Checklist within the planning review process framework.

### Streamlined Review of GHG Emissions in Development Projects



## CLIMATE ACTION PLAN – CONSISTENCY REVIEW CHECKLIST

### Application Submittal Requirements

1. The CAP Consistency Review Checklist is required only for proposed new development projects which are subject to CEQA review (non-exempt projects)
2. If required, the CAP Consistency Review Checklist must be submitted in addition to the basic set of requirements set forth in the Universal Application and the Planning Application Submittal Matrix.
3. The applicant shall work with staff to meet the requirements of this checklist. These requirements will be reflected in the conditions of approval and/or mitigation measures.
4. All conditions of approval and mitigation measures from this checklist shall be shown on full-size sheets for building plan check submittals.

### Application Information

Project Number: \_\_\_\_\_

Address of Property: \_\_\_\_\_

Was a special consultant retained to complete this checklist?  Yes  No. If yes, complete following

Consultant Name\*: \_\_\_\_\_

Company: \_\_\_\_\_

Phone: \_\_\_\_\_ E-Mail: \_\_\_\_\_

**CAP Consistency Checklist Form for Projects that are Not Exempt from CEQA**

Checklist Item (Check the appropriate box, and provide explanation for your answer).	Yes	No*	
1. Is the proposed project substantially consistent with the City’s over-all goals for land use and urban form, allowable floor area ratio (FAR) and/or density standards in the City’s 2030 General Plan, as it currently exists?	<input type="checkbox"/>	<input type="checkbox"/>	
Please explain how proposed project compares to 2030 General Plan with respect to density standards, FAR, land use and urban form. (See directions for filling out CAP Checklist)			
2. Would the project reduce average vehicle miles traveled (VMT) per capita of the proposed residents, employees, and/or visitors to the project by a minimum of 35% compared to the statewide average?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Please explain how proposed project meets this requirement. If “not applicable”, explain why this was not required. If project does not meet this requirement, see Directions for filling out CAP Consistency Review Checklist for alternatives to meeting checklist requirements.			
(Attach a copy of the VMT model <u>input</u> and output. Record the model and version here _____)			

\*If “No”, equivalent or better GHG reduction must be demonstrated as part of the project, and incorporated into conditions of approval.

*Note: Requirements from this checklist should be incorporated into the conditions of approval, and shown on the full-size plans submitted for building plan check.*

Checklist Item (Check the appropriate box, and provide explanation for your answer).	Yes	NA
3. Would the project incorporate traffic calming measures? <i>(Examples of traffic calming measures include, but are not limited to: curb extensions, speed tables, raised crosswalks, raised intersections, median islands, tight corner radii, roundabouts or mini-circles, on-street parking, planter strips with street trees, chicanes/chokers.)</i>		
Please explain how the proposed project meets this requirement (list traffic calming measures). If "not applicable", explain why traffic calming measures were not required.		
4. Would the project incorporate pedestrian facilities and connections to public transportation consistent with the City's Pedestrian Master Plan?	Yes	NA
Please explain how the proposed project meets this requirement. If "not applicable", explain why this was not required.		

\*If "No", equivalent or better GHG reduction must be demonstrated as part of the project and incorporated into the conditions of approval.

*Note: Requirements from this checklist should be incorporated into the conditions of approval, and shown on the full-size plans submitted for building plan check.*

5. Would the project incorporate bicycle facilities consistent with the City's Bikeway Master Plan, and meet or exceed minimum standards for bicycle facilities in the Zoning Code and CALGreen?	Yes	NA	
Please explain how the proposed project meets this requirement. If "not applicable", explain why this was not required.			
6. For residential projects of 10 or more units, commercial projects greater than 25,000 square feet, or industrial projects greater than 100,000 square feet, would the project include on-site renewable energy systems (e.g., photovoltaic systems) that would generate at least a minimum of 15% of the project's total energy demand on-site? (CAP Actions: 3.4.1 and 3.4.2)	Yes	No*	NA
Please explain how the proposed project meets this requirement. If "not applicable", explain why this was not required. If project does not meet requirements, see DIRECTIONS FOR FILLING OUT CAP CONSISTENCY REVIEW CHECKLIST re: alternatives to meeting checklist requirements.  Attach a copy of the CalEEMod input and output. Record the model and version here _____. Do NOT select the "use historical" box in CalEEMod for energy demand analysis related to this requirement.			
7. Would the project (if constructed on or after January 1, 2014) comply with minimum CALGreen Tier I water efficiency standards?	Yes	NA	
Please explain how the proposed project meets this requirement. If "not applicable", explain why this was not required.			

\*If "No", equivalent or better GHG reduction must be demonstrated as part and incorporated into the conditions of approval.

Note: Requirements from this checklist should be incorporated into the conditions of approval, and shown on the full-size plans submitted for building plan check.

**Certification**

I hereby certify that the statements furnished above and in the attached exhibits present the data and information required for this initial evaluation to the best of my ability and that the facts, statements and information presented are true and correct to the best of my knowledge and belief.

Signature: \_\_\_\_\_



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

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**Appendix B**  
**Special-Status Species Table**

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**APPENDIX B  
SPECIAL-STATUS SPECIES RECORDED OR POTENTIALLY OCCURRING WITHIN THE  
DEL PASO PARK IMPROVEMENT PROJECT SITE**

Genus/Species	Common Name	Status Federal/CA/Other	Habitats and Seasonal Distribution in California	Likelihood of Occurrence in Project Area
<b>PLANTS</b>				
<i>Clarkia biloba</i> ssp. <i>brandegeae</i>	Brandegee's clarkia	none/none/CNPS 4.2	This annual herb occurs in chaparral, cismontane woodland, lower montane coniferous forest in Butte, Eldorado, Nevada, Placer, Sacramento, Sierra, and Yuba counties. It blooms from May to July.	Low Potential. No individuals of this subspecies were observed within or near the project site. However, suitable habitat (i.e., cismontane woodland) does occur at the project site. Furthermore, the subspecies has been recorded in grassy openings under interior live oaks and blue oaks near Folsom. Therefore, the subspecies has some potential, albeit low, to occur within the project site.
<i>Juglans hindsii</i>	Northern California black walnut	none/none/CNPS 1B.1	Only one confirmed native occurrence of this tree is now considered extant. However, the species has been widely naturalized in cismontane woodland in northern California. Also known to hybridize with <i>J. regia</i> and is used as rootstock for this latter species in orchards. It blooms from April to May.	Low Potential. No individuals of this species were observed within or near the project site. However, this species occurs widely in northern California in mixed oak- riparian woodland. Therefore, it has some potential, albeit low, to occur within the project site.

**APPENDIX B  
SPECIAL-STATUS SPECIES RECORDED OR POTENTIALLY OCCURRING WITHIN THE  
DEL PASO PARK IMPROVEMENT PROJECT SITE**

Genus/Species	Common Name	Status Federal/CA/Other	Habitats and Seasonal Distribution in California	Likelihood of Occurrence in Project Area
<b>BIRDS</b>				
<i>Accipiter cooperii</i>	Cooper's hawk (nesting)	none/SA/none	Found as a breeding resident throughout most wooded portions of California (other than high Sierra Nevada). It prefers dense stands of oak, mixed oak- conifer woodland, and riparian woodland or forest near water for nest sites. It should be noted that it has been found in recent years nesting in urban woodlands.	Low Potential. There is suitable nesting habitat for the species (i.e., dense stands of mixed oak-riparian woodland) within the project site. Therefore, the species is considered to have some potential, albeit low, to nest within the project site.
<i>Buteo swainsoni</i>	Swainson's hawk	none/ST/none	Occurs in California as a breeding resident in the Central Valley (primarily in the southern Sacramento and northern San Joaquin valleys), Klamath Basin, and Modoc Plateau. However, nesting pairs are also occasionally found in the Mojave Desert, Lanfair Valley (San Bernardino County), Antelope Valley (Los Angeles County), and eastern San Luis Obispo County. In the Central Valley the species typically nests in riparian woodland or forest stands, or oak savannah. Nest territories are located adjacent to suitable foraging habitat (e.g., grassland, suitable grain and row crop fields, alfalfa, and pastures).	Low Potential. There is suitable nesting habitat for the species (i.e., large trees) within and immediately adjacent to the project site. Though there have been no records of nesting individuals reported to the CNDDDB for the park or adjacent areas, there are 30+ records for Swainson's hawk in the eBird data base from Del Paso Regional Park from 2011 to 2014. As such, the species is considered to have some potential, albeit low, to nest within the project site.

**APPENDIX B  
SPECIAL-STATUS SPECIES RECORDED OR POTENTIALLY OCCURRING WITHIN THE  
DEL PASO PARK IMPROVEMENT PROJECT SITE**

<b>Genus/Species</b>	<b>Common Name</b>	<b>Status Federal/CA/Other</b>	<b>Habitats and Seasonal Distribution in California</b>	<b>Likelihood of Occurrence in Project Area</b>
<i>Picoides nuttallii</i>	Nuttall's woodpecker (nesting)	none/SA/none	The species occurs as a resident of low- elevation riparian deciduous and oak habitats (cismontane woodland) throughout much of California with the exception of the deserts, high Sierra Nevada, and redwood belt.	Known to Occur. There is suitable cismontane woodland for the species (i.e., mixed oak-riparian woodland) associated with the project site and surrounding lands. Furthermore, there are many records for the species from Del Paso Regional Park in the eBird data base. Therefore, the species is known to occur within or immediately adjacent to the project site.
<i>Baeolophus inornatus</i>	Oak titmouse (nesting)	none/SA/none	Occurs as a common resident throughout much of California other than the deserts, high Sierra Nevada, and redwood belt. It is generally found in cismontane woodland (particularly oak or riparian woodlands) where it nests in the cavities created by woodpeckers.	Known to Occur. There is suitable cismontane woodland for the species (i.e., mixed oak-riparian woodland) associated with the project site and surrounding lands. Furthermore, there are many records for the species from Del Paso Regional Park in the eBird data base. Therefore, the species is known to occur within or immediately adjacent to the project site.

**APPENDIX B  
SPECIAL-STATUS SPECIES RECORDED OR POTENTIALLY OCCURRING WITHIN THE  
DEL PASO PARK IMPROVEMENT PROJECT SITE**

Genus/Species	Common Name	Status Federal/CA/Other	Habitats and Seasonal Distribution in California	Likelihood of Occurrence in Project Area
<b>MAMMALS</b>				
<i>Lasiurus cinereus</i>	Hoary bat	none/SA/none	This species occurs throughout California, although its distribution is patchy in the southeastern deserts. It is a common, solitary species that typically occurs in woodlands and forests with undisturbed, medium to large-size trees and dense foliage up to 13,200 feet in elevation. It winters along the coast and in southern California.	Low Potential. There are suitable roost sites for this species (i.e., undisturbed, medium to large-size trees and dense foliage in mixed oak-riparian forest) within the project site. Therefore, the species has some potential, albeit low, to roost within the project site.
<i>Lasiurus blossevillii</i>	Western red bat	none/CSC/none	The species occurs at scattered locations throughout the lowland portions of California west of the Sierra Nevada.	Low Potential. There are suitable roost sites for this species (i.e., undisturbed, medium to large-size trees and dense foliage).

**APPENDIX B  
SPECIAL-STATUS SPECIES RECORDED OR POTENTIALLY OCCURRING WITHIN THE  
DEL PASO PARK IMPROVEMENT PROJECT SITE**

<b>Genus/Species</b>	<b>Common Name</b>	<b>Status Federal/CA/Other</b>	<b>Habitats and Seasonal Distribution in California</b>	<b>Likelihood of Occurrence in Project Area</b>
<b>FEDERAL</b>				
	FE	Federally listed as Endangered		
	FT	Federally listed as Threatened		
	FPE	Federally proposed as Endangered		
	FPT	Federally proposed as Threatened		
	FC	Federal Candidate Species (former Category 1 candidates)		
<b>STATE</b>				
	SE	State listed as Endangered		
	ST	State listed as Threatened		
	SR	State listed as Rare		
	CFP	California Department of Fish and Wildlife designated "Fully Protected"		
	CSC	California Department of Fish and Wildlife designated "Species of Special Concern"		
	SA	California Department of Fish and Wildlife designated "Special Animal"		
<b>OTHER</b>				
	CNPS List 1A	Plants presumed extinct in California		
	CNPS List 1B	Plants that are rare, threatened, or endangered in California and elsewhere		
	CNPS List 2	Plants that are rare, threatened, or endangered in California, but are more common elsewhere		
	CNPS List 3	Plants about which more information is needed—a review list		
	CNPS List 4	Plants of limited distribution in California—a watch list		
	CNPS Threat Rank 0.1	Seriously threatened in California (high degree/immediacy of threat)		
	CNPS Threat Rank 0.2	Fairly threatened in California (moderate degree/immediacy of threat)		
	CNPS Threat Rank 0.3	Not very threatened in California (low degree/immediacy of threats or no current threats known)		

**APPENDIX B  
SPECIAL-STATUS SPECIES RECORDED OR POTENTIALLY OCCURRING WITHIN THE  
DEL PASO PARK IMPROVEMENT PROJECT SITE**

<b>Genus/Species</b>	<b>Common Name</b>	<b>Status Federal/CA/Other</b>	<b>Habitats and Seasonal Distribution in California</b>	<b>Likelihood of Occurrence in Project Area</b>
LIKELIHOOD OF OCCURRENCE DEFINITIONS				
	Known to Occur	Taxon was observed within or immediately adjacent to the project site or has previously been documented within or immediately adjacent to the project site.		
	High Potential	Taxon has not been documented within or immediately adjacent to the project site, but should be expected on more than 50% of visits to suitable habitat on and near the project site during the appropriate season and time of day.		
	Moderate Potential	Taxon has not been documented within or immediately adjacent to the project site, but should be expected on less than 50% of visits to suitable habitat on and near the project site during the appropriate season and time of day.		
	Low Potential	Taxon has not been documented within or immediately adjacent to the project site nor is it likely to occur on or near the project site, but its presence cannot be completely discounted due to incomplete information on the taxon's distribution or habitat requirements.		
	No Potential	Taxon does not occur within or immediately adjacent to the project site due to the lack of required habitat features for the taxon, or the known range of the taxon is well defined and does not include the project vicinity.		

**Appendix C**  
**Responses to Comments & Errata**

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## RESPONSES TO COMMENTS

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This Response to Comments document contains comments received during the public review period of the Del Paso Park Trail Improvement Project (proposed Project) Initial Study/Mitigated Negative Declaration (IS/MND). The proposed Project would improve approximately 1,400 linear feet of existing trail adjacent to Arcade Creek within Del Paso Park. The trail would be widened to a width of 8 feet using decomposed granite. A new entrance to the trail will be provided at its eastern end. Several new amenities will be provided in this area, including picnic tables, information kiosk, interpretive sign and a trash receptacle. These amenities are consistent with the Master Plan for the park.

The IS/MND was prepared for the proposed Project pursuant to Section 15070 of the California Environmental Quality Act (CEQA) Guidelines. The City of Sacramento, as lead agency, released the IS/MND for public review beginning on August 28, 2015, and ending on September 28, 2015, pursuant to Section 15105 of the CEQA Guidelines. The IS/MND and supporting documents were made available at the City of Sacramento Planning Department at 300 Richards Boulevard, Third Floor, Sacramento, California, 95811, and online at the City of Sacramento website. Copies were also provided to the State Clearinghouse.

According to CEQA Guidelines Section 15074, the lead agency must consider comments received during consultation and review period together with the IS/MND. However, the CEQA Guidelines do not require the lead agency to send responses directly to commenters. Unlike within an Environmental Impact Report, comments received on an IS/MND are not required to be attached to the IS, nor must the lead agency make specific written responses to public agencies. In addition, comments on an IS/MND are typically responded to in the Staff Report prepared for project hearings. Nevertheless, the City of Sacramento, as the lead agency, has chosen to provide responses to all of the comments received during the public review process for the proposed Project IS/MND.

### LIST OF COMMENTERS

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The City of Sacramento received three comment letters on the IS/MND for the proposed Project during the public comment period. The comment letters were authored by the following agency and individuals:

Letter 1	Central Valley Regional Water Quality Control Board
Letter 2	Randall Smith
Letter 3	Tim Vendlinski

### RESPONSE TO COMMENTS

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The Response to Comments section includes responses to the comment letters submitted regarding the proposed Project. Each comment letter received has been numbered at the top and bracketed to indicate how the letter has been divided into individual comments. Each comment is given a number with the letter number appearing first, followed by the comment number. For example, the first comment in



Letter 1 would have the following format: 1-1. To the extent that any revisions to the IS/MND text are required based on the comments received, new text is identified as double underlined and deleted text is shown as ~~struck through~~.



EDMUND G. BROWN JR.  
GOVERNOR

MATTHEW RODRIGUEZ  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

**Central Valley Regional Water Quality Control Board**

16 September 2015

Dana Mahaffey  
City of Sacramento  
300 Richards Boulevard, 3<sup>rd</sup> Floor  
Sacramento, CA 95811

CERTIFIED MAIL  
91 7199 9991 7035 8420 5471

**COMMENTS TO REQUEST FOR REVIEW FOR THE MITIGATED NEGATIVE DECLARATION, DEL PASO PARK PHASE 1 IMPROVEMENT PROJECT, SCH# 2015082059, SACRAMENTO COUNTY**

Pursuant to the State Clearinghouse's 28 August 2015 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Mitigated Negative Declaration* for the Del Paso Park Phase 1 Improvement Project, located in Sacramento County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

**I. Regulatory Setting**

**Basin Plan**

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments

1-1

only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues.

For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/basin\\_plans/](http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/).

### **Antidegradation Considerations**

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Policy is available on page IV-15.01 at:

[http://www.waterboards.ca.gov/centralvalleywater\\_issues/basin\\_plans/sacsjr.pdf](http://www.waterboards.ca.gov/centralvalleywater_issues/basin_plans/sacsjr.pdf)

In part it states:

*Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.*

*This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.*

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

## **II. Permitting Requirements**

### **Construction Storm Water General Permit**

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).

1-1  
(cont.)

1-2

For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/constpermits.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml).

1-2  
(cont.)

### **Phase I and II Municipal Separate Storm Sewer System (MS4) Permits<sup>1</sup>**

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/storm\\_water/municipal\\_permits/](http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/).

1-3

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:

[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/phase\\_ii\\_municipal.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml)

### **Industrial Storm Water General Permit**

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ.

For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/storm\\_water/industrial\\_general\\_permits/index.shtml](http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml).

1-4

### **Clean Water Act Section 404 Permit**

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACOE). If a Section 404 permit is required by the USACOE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements.

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<sup>1</sup> Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACOE at (916) 557-5250.

**Clean Water Act Section 401 Permit – Water Quality Certification**

If an USACOE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications.

**Waste Discharge Requirements – Discharges to Waters of the State**

If USACOE determines that only non-jurisdictional waters of the State (i.e., "non-federal" waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation.

For more information on the Water Quality Certification and WDR processes, visit the Central Valley Water Board website at:  
[http://www.waterboards.ca.gov/centralvalley/help/business\\_help/permit2.shtml](http://www.waterboards.ca.gov/centralvalley/help/business_help/permit2.shtml).

**Regulatory Compliance for Commercially Irrigated Agriculture**

If the property will be used for commercial irrigated agricultural, the discharger will be required to obtain regulatory coverage under the Irrigated Lands Regulatory Program. There are two options to comply:

1. **Obtain Coverage Under a Coalition Group.** Join the local Coalition Group that supports land owners with the implementation of the Irrigated Lands Regulatory Program. The Coalition Group conducts water quality monitoring and reporting to the Central Valley Water Board on behalf of its growers. The Coalition Groups charge an annual membership fee, which varies by Coalition Group. To find the Coalition Group in your area, visit the Central Valley Water Board's website at: [http://www.waterboards.ca.gov/centralvalley/water\\_issues/irrigated\\_lands/app\\_approval/index.shtml](http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/app_approval/index.shtml); or contact water board staff at (916) 464-4611 or via email at [IrrLands@waterboards.ca.gov](mailto:IrrLands@waterboards.ca.gov).
2. **Obtain Coverage Under the General Waste Discharge Requirements for Individual Growers, General Order R5-2013-0100.** Dischargers not participating in a third-party group (Coalition) are regulated individually. Depending on the specific site conditions, growers may be required to monitor runoff from their property, install monitoring wells, and submit a notice of intent, farm plan, and other

1-4

(cont.)

action plans regarding their actions to comply with their General Order. Yearly costs would include State administrative fees (for example, annual fees for farm sizes from 10-100 acres are currently \$1,084 + \$6.70/Acre); the cost to prepare annual monitoring reports; and water quality monitoring costs. To enroll as an Individual Discharger under the Irrigated Lands Regulatory Program, call the Central Valley Water Board phone line at (916) 464-4611 or e-mail board staff at IrrLands@waterboards.ca.gov.

**Low or Limited Threat General NPDES Permit**

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Dewatering and Other Low Threat Discharges to Surface Waters* (Low Threat General Order) or the General Order for *Limited Threat Discharges of Treated/Untreated Groundwater from Cleanup Sites, Wastewater from Superchlorination Projects, and Other Limited Threat Wastewaters to Surface Water* (Limited Threat General Order). A complete application must be submitted to the Central Valley Water Board to obtain coverage under these General NPDES permits.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/general\\_orders/r5-2013-0074.pdf](http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0074.pdf)

For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/general\\_orders/r5-2013-0073.pdf](http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0073.pdf)

If you have questions regarding these comments, please contact me at (916) 464-4684 or [tcleak@waterboards.ca.gov](mailto:tcleak@waterboards.ca.gov).



Trevor Cleak  
Environmental Scientist

cc: State Clearinghouse unit, Governor's Office of Planning and Research, Sacramento

1-4  
(cont.)

**LETTER 1: CENTRAL VALLEY REGIONAL WATER QUALITY CONTROL BOARD**

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**Response to Comment 1-1**

The comment provides an overview of the Basin Plan and antidegradation considerations for the discharge of wastewater. The proposed Project would not result in any wastewater discharge, so an antidegradation analysis is not required.

**Response to Comment 1-2**

As indicated in the comment, a project that would disturb one acre or more must obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities. As stated on page 9 of the IS/MND, the proposed Project would disturb approximately 0.75 acres of land and is not part of a larger common plan for development. Therefore, the General Permit provisions do not apply to the proposed Project. Nonetheless, as discussed on page 44 of the IS/MND, the proposed Project must prepare an erosion control plan in compliance with the City's Land, Grading and Sediment Erosion Ordinance, which would protect water quality by ensuring that soils and any leaked contaminants from cleared and graded areas are properly contained.

**Response to Comment 1-3**

The proposed Project would be constructed in compliance with the City's MS4 permit, including the use of appropriate BMPs to protect water quality.

**Response to Comment 1-4**

The comment refers to a number of provisions that do not apply to the proposed Project. The project is not industrial or agricultural, so the Industrial Storm Water General Permit and Regulatory Compliance for Commercially Irrigated Agriculture do not apply. As stated on page 28 of the IS/MND, there are no wetlands on the site, so Sections 404 and 401 of the Clean Water Act do not apply. The proposed Project does not require dewatering, so the Low or Limited Threat General NPDES permit does not apply.

From: Randy Smith <[randalas@ardennet.com](mailto:randalas@ardennet.com)> Date: 09/28/2015 3:54 PM (GMT-08:00)  
To: Dana Mahaffey <[DMahaffey@cityofsacramento.org](mailto:DMahaffey@cityofsacramento.org)> Subject: comments on Mitigated Negative Declaration - Del Paso Regional Park - Phase 1 Trail Improvement Project (#L19114100)

Submitted to:

Dana Mahaffey, Associate Planner  
City of Sacramento, Community Development Department  
Environmental Planning Services  
300 Richards Boulevard, Third Floor  
Sacramento, CA 95811

It is hard to comment on the Mitigated Negative Declaration (MND) for the Del Paso Regional Park - Phase 1 Trail Improvement Project (#L19114100) when there are as yet no final plans to look at. After looking at plans for this project earlier this year, amenities were identified in those plans that were inconsistent with the 1985 Master Plan for Del Paso Regional Park, yet the top of page 9 of the MND states that "These amenities are consistent with the Master Plan for the park."

2-1

As referred to on page 10 under "Coordination Efforts", I requested a meeting July 15, 2015 with the project planner, Dennis Day, and other park users to discuss the plan's amenities that were inconsistent with the 1985 Master Plan. I have been told that changes will be made, but as yet no revised plans have been made available to the public to confirm this. Consequently, I feel that page 1, "Section II - Project Description" of the MND does not include "a detailed description of the proposed project" as it states.

2-2

As a frequent user of the trails in this park for the past 50 years, I request to be kept informed as this project proceeds forward.

2-3

Respectfully submitted,  
Randall A. Smith



**LETTER 2: RANDALL SMITH**

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**Response to Comment 2-1**

The improvements that would be implemented by the proposed Project are described on pages 4 and 9 of the Initial Study, and the locations of the improvements are shown in Figure 4 of the Initial Study. The information contained in the Project Description of the Initial Study provides sufficient detail to evaluate the impacts of the proposed Project. As stated on page 10 of the Initial Study, the proposed Project was revised after City staff met with stakeholders on July 15, 2015. The revisions included reducing the width of the trail from 10 to 8 feet, changes to the trail alignment, and placement of picnic facilities only on the eastern side of the project area. These revisions were included in the project analyzed in the Initial Study.

**Response to Comment 2-2**

The plans the comment refers to may be the preliminary construction plans. The preliminary construction plans were reviewed during the preparation of the Initial Study, but the level of detail in these drawings exceeds the information needed to analyze the environmental effects of the proposed Project. As discussed in Response to Comment 2-1, the proposed Project was revised after the first preliminary drawings were prepared, and those plans are being revised to incorporate the changes made after the last set of plans were prepared. Those changes will be consistent with the project described in the Initial Study, and are expected to be complete in January 2016.

The 1985 Master Plan designates the majority of the project area "Natural Habitat Area". Bridle paths are shown within the Natural Habitat Area. The easternmost part of the project area is not part of the Natural Habitat Area. The proposed Project would locate picnic areas in the eastern portion. Two picnic tables would be located within the Natural Habitat Area, in an area that is composed of non-native grasses. The only other improvements within the Natural Habitat Area would be the 8-foot wide trail and removal of poison oak. This is an existing trail that has become more narrow over the years so that it no longer serves effectively as a bridle path. Widening the trail would be consistent with the 1985 Master Plan, which recognized the existence of bridle paths in the Natural Habitat Area and included an equestrian crossing at the access bridge at Watt Avenue.

For clarification, the following sentences are added to the end of the third paragraph under **Project Background** on page 4 of the IS/MND:

The 1985 Master Plan designates the majority of the project site as Natural Habitat Area. The easternmost portion of the project site is designated Neighborhood Park in the Master Plan.

**Response to Comment 2-3**

As requested, Mr. Smith has been placed on the mailing list for notices related to the proposed Project.

**Letter 3**

**From:** Tim Vendlinski <[tvendlinski@sbcglobal.net](mailto:tvendlinski@sbcglobal.net)> **Date:** Sunday, September 27, 2015 at 2:51 PM  
**To:** Dana Mahaffey <[DMahaffey@cityofsacramento.org](mailto:DMahaffey@cityofsacramento.org)>  
**Cc:** "[dday@cityofsacramento.org](mailto:dday@cityofsacramento.org)" <[dday@cityofsacramento.org](mailto:dday@cityofsacramento.org)>, Mike Bumgardner <[michael.bumgardner@att.net](mailto:michael.bumgardner@att.net)>, Adrienne Graham <[algraham@surewest.net](mailto:algraham@surewest.net)>, Mary de Beauvieres <[MdeBeauvieres@cityofsacramento.org](mailto:MdeBeauvieres@cityofsacramento.org)>, Shannon Brown <[SDBrown@cityofsacramento.org](mailto:SDBrown@cityofsacramento.org)>  
**Subject:** DEL PASO PARK TRAIL IMPROVEMENT PROJECT (#L19114100)

DEL PASO PARK TRAIL IMPROVEMENT PROJECT (#L19114100) INITIAL STUDY PROPOSED  
MITIGATED NEGATIVE DECLARATION  
August 2015

TO: Dana Mahaffey, Associate Planner  
City of Sacramento, Community Development Department  
Environmental Planning Services  
[dmahaffey@cityofsacramento.org](mailto:dmahaffey@cityofsacramento.org)

FROM: Tim Vendlinski

DATE: 09/27/2015  
Dear Ms. Mahaffey:

Thank you for the opportunity to provide comments on the draft MND.

This proposed project was a complete surprise to those of us who have been involved for several decades in the conservation and restoration of Arcade Creek and Del Paso Regional Park. Furthermore, the proposed trail plan is not consistent with the carefully negotiated, permanent protections for natural habitat within Del Paso Regional Park (DPRP) as codified in the governance documents for the park:  
<http://www.cityofsacramento.org/ParksandRec/Parks/Park-Directory/Arden-Arcade/Del-Paso-Regional-Park>

3-1

3-2

The IS/MND portray this as Phase 1 of a multi-phase trail building project in the Regional Park, yet the potential impacts of this multi-phase project (both positive and negative) are not disclosed or evaluate. This is contrary to the tenets of CEQA, and represents piecemeal development and permitting in light of a larger implied, reasonably foreseeable project. This overlooks the potential for cumulative damage to aquatic, biological, and cultural resources. And while the IS/MND provide a good description and cross-reference to 2035 Master EIR regarding resources of citywide significance, the IS/MND does an extremely poor job of accounting for, and cross-referencing, provisions with the 1985 Master Plan for Del Paso Regional Park that designated most of the study area for permanent protection (not recreational development).

3-3

The proposed project seems to be the proverbial 'solution looking for a problem' as The City

3-4

never conducted a needs assessment for the proposed project and never consulted with neighbors in the surrounding area. On 03/9/09, a brief and vague mention was made to me about a proposed trail project for the Park, and on 03/11/09, I advised the City to direct any potential work toward the impassable segments of the trail, and, below, I submit this email correspondence for the record as a formal part of my comments on the MND.

For a proper needs assessment, the City should have convened representatives from the conservation, equestrian, and cross-country running groups and the surrounding neighbors so we can discuss your goals for the Park, the needs and interests of user groups when it comes to trail improvements, compliance with longstanding conservation agreements, and consistency with the natural resources provisions of the City's general plan.

There are many significant problems with the recreational and natural resource assets at the park. Historically, significant damage was done to the trail by the City, County, and State and never mitigated (e.g., the overpasses at the softball complex bridge, Watt Avenue, and I-80). This project represents a missed opportunity to repair the badly damaged trail segments beneath the bridges that have fragmented the park into eastern and western sections, and ruined recreational use of the trails.

The City and the Science Center have also allowed for the deterioration of the ADA trail segment that was built west of Bridge Road in the late 1980s, and this raises questions about how or whether the City will maintain the proposed trail segment into the future. Even worse, the City allowed the Science Center, without any public review or comment, to build a formidable barrier around the perimeter of their parcel, and this has greatly degraded the trail experience for all users. If the City wishes to add value to the trail experience, it should focus on repairing the trail in the proximity of the overpasses, and remove or significantly set-back the Science Center barrier. And when it comes to providing picnic facilities, the City should focus on revitalizing and improving security on the picnic grounds at 'Old Del Paso Park' (immediately east of your study area).

The study area for your proposed project is permanently protected under a legally-binding, CEQA-certified mitigation agreement (involving the construction of the Sacramento Softball Complex). It's an important part of the park's conservation portfolio as it constitutes the highest point in the park, is underlain by hardpan, and features a slowly recovering oak-savanna environment. Trees should not be added or subtracted to this setting, and the narrow trail should not be radically widened by your plan. Contrary to the conclusions in your Initial Study and MND, the proposed project is not consistent with the 1985 Master Plan as it creates a significant intrusion into the protected habitat, and potentially introduces a greater level of disturbance into the protected area.

In July 2015, a representative from the City met with neighbors and interested stakeholders, and verbally committed to make several significant changes to the proposed project, and the City should have reflected these changes in the IS/MND document that you issued in August 2015. Those changes would have actually constituted mitigations that would have added legitimacy to the conclusions in the MND. As it stands, the MND declares that the proposed project is somehow mitigated by reference to policy provisions in the 2035 Master EIR. These "paper mitigations" are no substitute for project-specific, tangible mitigations pledged in July 2015.

3-4  
(cont.)

3-5

3-6

**Some of these changes based on public input include the following:** -> move all the proposed picnic facilities (concrete pads, tables, waste receptacles) from the western end of the project and into Old Del Paso Park. -> delete the proposed spur trail from the western end of the project to avoid damage to the upland oak savanna. -> clear the dead and dying eucalyptus and black locust from the western end of the proposed project and retain the naturally occurring oak saplings underneath so the northern terrace can transition back into an oak woodland. -> swing trail northward in the proximity of the large heritage oak (and retain the poison oak vines on the trunk of this tree) to avoid any disturbance within the drip line of the tree, and to obviate the need for clearing poison oak. -> replace failed culverts along the corridor for proposed trail. -> significantly reduce the width of the proposed trail to minimize the loss of oaks and delete the proposed metal border from each side of the trail.

3-6  
(cont.)

**Enclosed below are verbatim sections from the IS/MND (in italics) followed by my specific comments:**

P. 3 (8 of 86)*The proposed Project would improve approximately 1,400 linear feet of existing trail adjacent to Arcade Creek...The trail would be widened to from 8 to10 feet using decomposed granite. A new entrance to the trail will be provided at its eastern end. Several new amenities will be provided in this area, including picnic tables, information kiosk, interpretive sign and a trash receptacle.*

**COMMENT:** The project manager from the City pledged to significantly reduce the proposed widening of the trail, and this scaling-back of the project should be reflected in the IS/MND.

P. 4 (9 of 86)

*Del Paso Regional Park is an approximately 145.6-acre, multi-use park...some components of which have been in operation for many decades. The Park includes three golf courses, the Haggin Oaks Golf Complex, which has been open for over 80 years. The Park also includes lighted ball fields. Other recreational features include picnic areas, a sand volleyball court, a play structure and area, restrooms and the Sacramento Softball Complex. The Sacramento Horsemen's Association is located within the Park boundaries...substantial portions of the park are designated natural habitat areas, generally along Arcade Creek. In general, the only improvements within the nature areas are dirt trails and post and cable fencing. P. 52 The project site is located within the 680-acre Del Paso Regional Park, which is classified as a regional park. The park contains a variety of park and recreational facilities, including pedestrian and equestrian trails, natural habitat areas, lighted ball fields, restrooms, Sacramento Horsemen's Association, picnic areas two children's play areas, the Discovery Museum Science and Space Center, three golf course, two food vendors, Renfree Baseball Field, the Sacramento Softball Complex and the Longview Oaks Natural Habitat Area.*

**COMMENT:** During the Master Plan process that concluded in 1985, the City described The Regional Park as encompassing ~680 acres including the ~200 acres that were address by that Master Plan. The more accurate description of the Park's assets is contained on page 52 of the IS/MND, and this description should replace the description contained on Page 4.

3-7

P. 4 (9 of 86)

*In 1985, the City adopted a Master Plan for the park, which provided for ball fields and parking near Auburn Boulevard and Bridge Street and a nature area and bridle paths in the easternmost portion of the park, including the project site. The project site is within a natural area composed primarily of grassland and oak woodland. The project site is designated Recreation and is zoned*

3-8

R-1. *Passive recreational facilities are allowed uses within this zoning.*

**COMMENT:** this statement is not correct. The Master Plan provided for the construction of the softball complex west of Watt Ave. and the designation of about 90 acres of natural habitat along the creek to mitigate for the development of the complex. The bridle paths were already there as was Harry Renfree baseball field (along Auburn Blvd). The zoning of this parcel is immaterial as it was declared as permanently protected natural habitat (mitigation lands) by the City Council in 1985. The proposed project was not envisioned by the Master Plan and actually intrudes upon, and could cause degradation of, the habitat.

3-8  
(cont.)

P. 4 (9 of 86) and P. 9 (14 of 86)

**PROJECT DESCRIPTION**

*The proposed Project would improve approximately 1,400 linear feet of existing trail adjacent to Arcade Creek (see Figure 4). The trail would be widened to a width of 8 feet using decomposed granite. A new entrance to the trail will be provided at its eastern end. Several new amenities will be provided in this area, including picnic tables, information kiosk, interpretive sign and a trash receptacle. These amenities are consistent with the Master Plan for the park.*

**COMMENT:** this statement is not correct. This type of recreational development is not consistent with the Master Plan. The natural areas were set aside as CEQA-approved mitigation to protect the oak woodlands and creek, and not for the development of park infrastructure. There are plenty of other acres within the Regional Park, especially wasted and mismanaged land within the golf course envelope that could be upgraded as recreational amenities. The fact remains that this project is unnecessary and strays from community recommendations that the City focus its trail management efforts where they are truly needed - beneath the over-passes of bridges built by the City, County, and State.

3-9

P. 9 (14 of 86)

*Construction activities would include vegetation and tree removal where grading and construction would occur. Approximately 6 Valley Oak, 3 Interior Live Oak, 2 Blue Oak and 3 Black Locust would be removed. Additional non-native trees and vegetation may be removed to improve conditions for native trees and vegetation. Poison oak along the trail edge will also be removed.*

**COMMENT:** The IS/MND repeat the same mistake encoded in City policy to disregard the importance of oak seedlings and saplings whose sources are mature/heritage trees (possessing thousands of years of site-specific genetic characteristics) that are growing naturally on City property cost-free and without need for irrigation. These young trees are arguably more valuable than the heritage oaks (protected by municipal code) as the young trees are genetically connected to the creek's original forest, have potentially hundreds of years ahead (while the heritage trees may have only tens of years ahead of them). For this proposed project, every effort should be made toward avoiding the destruction of oaks - especially blue oaks that have been disproportionately destroyed by suburban and military development in the region.

3-10

P. 10 (15 of 86)

*The City held a meeting with stakeholders (e.g., local residents, Sacramento Horsemen's Association) to discuss the proposed Project on July 15, 2015. In addition to reviewing the proposed plans, staff and attendees walked the proposed trail alignment. As a result of this meeting, the proposed trail width was reduced from 10 to 8 feet, and several minor changes were made to the trail alignment and placement of picnic tables and other facilities.*

**COMMENT:** The IS/MND should have detailed all the changes agreed to by the City and this

3-11

could have been easily accomplished by adding a 1-2 page addendum to the IS/MND. This would not only have been allowed by CEQA, it would have been completely consistent with the spirit of CEQA..

3-11  
(cont.)

P. 11 (16 of 86)

*CEQA also requires a discussion of any inconsistency between the proposed Project and applicable general plans and regional plans. Land Use and Planning.*

*The project site has been designated as Parks and Recreation in the 2035 General Plan, and is zoned R-1, Single-Unit Dwelling Zone, which allows for recreational uses. The project site is located in an urbanized portion of the community, within an existing regional park. The proposed Project would widen an existing trail and add a picnic area to the project site, which are consistent and compatible with the existing park uses.*

3-12

**COMMENT:** These conclusions are not correct: the proposed project is not consistent with the 1985 Master Plan as it creates an intrusion into the protected habitat, and serves as the apparent precursor to a much larger, unspecified trail project.

P. 16 (21 of 86)

*C. Visual Character*

*As described above, the visual character of the project site is typical of a nature area, with a natural setting and minimal improvements. The proposed Project would provide amenities that would be consistent with the nature area, including a wider trail, picnic tables and interpretive signs. The widened trail would not be noticeably different from the existing trail, especially when the adjacent grass is long. The picnic tables and signs would be visible from portions of the trail and the adjacent road, but would be in character with the nature park like setting. No views would be blocked or interrupted. For these reasons, the change in visual character would be a less-than-significant impact.*

3-13

**MITIGATION MEASURES**

*No mitigation would be required.*

**COMMENT:** This conclusion is not correct. These proposed recreational facilities were never envisioned by the 1985 Master Plan, and they are not consistent with the character of a nature preserve (where the focus should be unstructured natural habitat devoted to the conservation of flora and fauna).

P. 25 (30 of 86)

**STANDARDS OF SIGNIFICANCE**

*For purposes of this environmental document, an impact would be significant if any of the following conditions or potential thereof, would result with implementation of the proposed Project:*

- *Creation of a potential health hazard, or use, production or disposal of materials that would pose a hazard to plant or animal populations in the area affected;*
- *Substantial degradation of the quality of the environment, reduction of the habitat, reduction of population below self-sustaining levels of threatened or endangered species of plant or animal;*

3-14

**P. 26 (31 of 86) SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MASTER EIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS**

**Policy ER 2.1.5: Riparian Habitat Integrity.** *The City shall preserve the ecological integrity of creek corridors, canals, and drainage ditches that support riparian resources*

P. 27 (32 of 86)

*Policy ER 2.1.7: Annual Grasslands. The City shall preserve and protect native grasslands and vernal pools that provide habitat for rare and endangered species. If not feasible, the mitigation of all adverse impacts on annual grasslands shall comply with State and Federal regulations protecting foraging habitat for those species known to utilize this habitat.*

*Policy ER 2.1.8: Oak Woodlands. The City shall preserve and protect oak woodlands, heritage oaks, and/or significant stands of oak trees in the city that provide habitat for common native, and special-status wildlife species, and shall address all adverse impacts on oak woodlands in accordance with the City's Heritage Tree Ordinance.*

**COMMENT:** The project as proposed adversely affects natural resources and damages the riparian corridor, annual grasslands, and oak woodlands.

3-14  
(cont.)

P. 25 (30 of 86)

B-2, B-5, B-6

**COMMENT:** Cooper's Hawk has been documented along the creek as recently as 2014, so its "Likelihood" potential in the MND should be upgraded from "Low" to "Moderate". Cooper's Hawk @ Site

E <http://www.arcadecreekproject.org/studies/vertebrates/documents/Vertebrates%202014%20Spring%20Data.pdf>

3-15

P. 28 (33 of 86)

*The proposed Project would remove vegetation along the length of the existing trail in order to widen it, and where picnic tables would be located. In addition to grasses, the trail widening would necessitate the removal of 14 trees, consisting of:*

- 6 valley oaks (*Quercus lobata*),
- 3 interior live oaks (*Quercus wislizenii*),
- 2 blue oaks (*Quercus douglasii*), and
- 3 black locusts (*Robinia pseudoacacia*).

*None of the trees that would be removed for the proposed Project are over 7 inches dbh (diameter at breast height), so none would be considered heritage trees. The removal of the 11 relatively small oak trees would not compromise the integrity of the oak woodland within the project site and surrounding area. The project site would continue to be part of a larger natural area. For these reasons, the impact of removing trees would be less than significant.*

P. 61 (66 of 86)

*A. Plants and Wildlife and Historic Resources*

*As discussed in Item 3, Biological Resources, the project site does provide habitat for several special-status plant and wildlife species. Mitigation is identified to ensure that any impacts on special-status species are less than significant.*

**COMMENT:** The MND does not actually identify any mitigation for the destruction of these trees so it is not correct for the MND to conclude that impacts from removing the trees would be less than significant. The MND declares that the proposed project is somehow mitigated by reference to policy provisions in the 2035 Master EIR. These "paper mitigations" are no substitute for project-specific, tangible mitigations pledged by the City in July 2015.

3-16

P. 32 (37 of 86)

*SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MASTER EIR, INCLUDING CUMULATIVE IMPACTS, GROWTH INDUCING IMPACTS, AND IRREVERSIBLE SIGNIFICANT EFFECTS*

P. 61-62 (67-68 of 86)

*B. Cumulative Impacts*

3-17

*As discussed in Items 1 through 12 with implementation of applicable General Plan policies, required regulation and ordinances, and the mitigation measures previously identified herein and, the proposed Project would not substantially contribute to cumulative impacts and/or cause the cumulative impacts of the 2035 General Plan EIR to exceed the levels described in the Master EIR. Therefore, this is an impact that is less than significant.*

**COMMENT:** The IS/MND portray this as Phase 1 of a multi-phase trail building project in the Regional Park, yet the potential impacts of this multi-phase project (both positive and negative) are not disclosed or evaluate. This is contrary to the tenets of CEQA, and represents piecemeal development and permitting in light of a larger implied, reasonably foreseeable project. This overlooks the potential for cumulative damage to aquatic, biological, and cultural resources. And while the IS/MND provide a good description and cross-reference to 2035 Master EIR regarding resources of citywide significance, the IS/MND does an extremely poor job of accounting for, and cross-referencing, provisions with the 1985 Master Plan for Del Paso Regional Park that designated most of the study area for permanent protection (not recreational development).

3-17  
(cont.)

P. 52 (57 of 86)

*STANDARDS OF SIGNIFICANCE (Impacts to Recreation)*

*For purposes of this Initial Study, impacts to recreational resources are considered significant if the proposed Project would do either of the following:*

- cause or accelerate substantial physical deterioration of existing area parks or recreational facilities; or*
- create a need for construction or expansion of recreational facilities beyond what was anticipated in the 2035 General Plan.*

P. 53 (58 of 86) A. and B. *Deterioration and/or Expansion of Parks and Recreation*

*The proposed Project does not include any residential or other uses that would increase the demand for parks and recreational facilities. The proposed Project would make improvements within an existing park by widening 1,400 linear feet of a trail and installing picnic tables. These improvements are consistent with the 1985 Master Plan for the park, so they would have been anticipated in the 2035 General Plan.*

**COMMENT:** the proposed project is not consistent with the 1985 Master Plan.

3-18

P. 59 (64 of 86)

*A. and B. (Utility Service Capacity)*

*The proposed Project would not provide drinking fountains, restrooms, lighting or other facilities that require connection to water, sewer, electrical or gas lines. The project area would continue to drain overland or by ditch/culvert to Arcade Creek. There would be a small amount of impervious surface created for the picnic table pads, but storm water would flow onto the adjacent ground and either be absorbed or flow to the creek.*

**COMMENT:** The City should have detailed the pledge made in July 2015 to repair failing culverts along the trail corridor.

3-19



**LETTER 3: TIM VENDLINSKI**

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**Response to Comment 3-1**

The commenter communicated with City staff about the proposed Project on May 26, 2015, several months before the IS/MND was released for public review. City Parks staff met with Mr. Vendlinski on July 24, 2015. As the result of discussion with Mr. Vendlinski and other stakeholders, several changes were made to the proposed Project, as described in the Responses to Comments 2-1 and 2-2. In addition, in a subsequent comment, Mr. Vendlinski indicates that he first heard mention of a trail project in 2009.

**Response to Comment 3-2**

The 1985 Master Plan does identify most of the project area as Natural Habitat Area. The easternmost portion of the project area is not designated Natural Habitat Area. The Master Plan identifies bridle paths within the Natural Habitat Area, and calls for the installation of a post and cable fence along the boundary of the Natural Habitat Area to prevent vehicle access. The Master Plan does not preclude widening and improving the trail, and the trail has been wider in the past than it is today.

Please also see Response to Comment 2-2.

**Response to Comment 3-3**

The proposed Project is a stand-alone project with independent utility. That is, the trail widening and picnic facilities would improve conditions within the park in and of themselves, and do not depend on future improvements, if any, nor is the proposed Project a necessary component for such improvements to occur. For example, the City could decide, as a completely separate action, to replace culverts along the existing bridle paths without consideration of the proposed Project. For clarity, the title of the project on the cover and pages 1 and 2 of the Draft Initial Study are revised as follows:

Del Paso Regional Park ~~Phase 4~~Trail Improvements

The 1985 Master Plan identifies bridle paths in the portion of the Natural Habitat Area. Those trails have become degraded since adoption of the Master Plan. The proposed Project and other similar projects that would provide park improvements consistent with the 1985 Master Plan and the 2035 General Plan would be similar in character, and could be fully mitigated with measures similar to those identified in the 2035 General Plan Master EIR and/or the Initial Study for the proposed Project. Therefore, the impacts would not be cumulatively considerable.

**Response to Comment 3-4**

The comment expresses opinions about the outreach process that should have been used to identify park improvements and makes recommendations for other trail segment improvements within the regional park, outside of the proposed project limits. . These comments do not apply directly to the proposed Project, but will be considered by City staff during any future planning efforts for Del Paso Regional Park.

### Response to Comment 3-5

The 1985 Master Plan mitigation measures did not preclude the widening of trails through the Natural Habitat. Furthermore, the Del Paso Regional Park/Arcade Creek Management Plan<sup>1</sup> includes trail maintenance as one of its objectives (see page 11), along with preservation and restoration of natural habitats (page 4), flood control (page 7), fire control (page 9), and creek maintenance (page 10). The section of the Management Plan addressing trail maintenance states that a single, dominant main upland trail on each side of Arcade Creek will be maintained for pedestrian and equestrian use and to provide erosion control, as a smooth trail surface and enhancement of the park's recreational use (page 11). User-friendly park signage is suggested to explain proper and safe use of the trails, park rules and regulations and so on (page 14). The tree and brush trimming guidelines show vegetation being cleared for 8 feet in width and 10 feet in height along equestrian trails (Appendix C, page 40). The proposed project is consistent with these provisions of the Management Plan.

Most of the trail would be located within grassland, but a portion would be located within oak woodland. As discussed on pages 28 and 29 of the Initial Study, only 14 trees, all under 7 inches diameter at breast height (dbh) would be removed to accommodate the proposed Project. The loss of these trees would not compromise the integrity of the oak woodland located within the project area.

### Response to Comment 3-6

As discussed on page 10 of the Initial Study, several changes were made to the proposed Project in response to concerns expressed at the July 2015 stakeholder meeting, including the relocation of the portions of the project improvements outside of the Natural Habitat Area. The proposed Project analyzed in the Initial Study includes the revisions. These revisions were incorporated into the project, and as such are not mitigation measures.

The Initial Study identifies measures from the 2035 General Plan Master EIR that would reduce impacts of the project. The proposed Project must comply with these measures. The Initial Study also identifies additional measures where necessary to reduce the impacts specific to the proposed Project. A Mitigation Monitoring Program has been prepared as required by CEQA to ensure that the identified measures are implemented.

### Response to Comment 3-7

The reference to acreage on page 4 is incorrect. Therefore, the following revision is made to the first line in the first sentence of the third paragraph on page 4:

Del Paso Regional Park is an approximately ~~445.6~~ 680-acre multiuse park...

The remainder of the description is correct, and is consistent with the description on page 52 of the IS/MND. The above revision does not alter the conclusions of the IS/MND, because park size is reported as background and not used in the analysis of impacts.

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1. City of Sacramento, *Del Paso Regional Park/Arcade Creek Nature Area Maintenance and Management Agreement*, Circa 1998.

**Response to Comment 3-8**

The text on page 4 of the IS/MND provides background information on the project area. The 1985 Master Plan does show parking in the vicinity of Bridge Street and the Renfree baseball field, as well as the nature areas and bridle paths. The Master Plan does not call for the removal of these elements, so it does “provide” for them. The description focuses on the components of the Master Plan that are in proximity to the project site, so improvements west of Bridge Street are not discussed here.

The land use designations and zoning are reported as background and to show that the proposed Project is a consistent use. Consistency with the land use designation and zoning is relevant to the determination that the proposed Project was within the scope of 2035 General Plan.

**Response to Comment 3-9**

Please see Responses to Comments 2-2, 3-2, and 3-3.

**Response to Comment 3-10**

Please see Response to Comment 3-5.

**Response to Comment 3-11**

The changes to the project occurred prior to the preparation of the IS/MND, and were analyzed as the proposed Project. The changes are summarized on page 10 of the IS/MND. Because the proposed Project described on pages 4 and 10 of the IS/MND already incorporates the referenced changes, no addendum or addition to the IS/MND was necessary.

**Response to Comment 3-12**

Please see Responses to Comments 2-2, 3-2 and 3-3.

**Response to Comment 3-13**

For a discussion of consistency with the Master Plan, please see Responses to Comments 2-2 and 3-2. Regarding the visual compatibility of the proposed improvements, the trail is already present, and is located at grade or below, so widening and extending it would not substantially alter the visual character of the site. The tables and benches would be low profile and located at the edge of the natural area (actually within a portion of the park designated Neighborhood Park on the Master Plan). Viewers who could see the picnic area would also be able to see both the natural area and surrounding homes and the existing park, so the picnic tables would not degrade the existing view.

**Response to Comment 3-14**

As discussed on pages 28 through 30, the adverse effects of the project on biological resources would be less than significant with mitigation. The proposed Project would not require construction within the creek corridor, and would not substantially degrade the

riparian habitat, so the project would be consistent with Policy ER 2.1.5. The proposed Project would disturb less than one acre of non-native grassland. No native grassland or vernal pools would be affected, so the project would be consistent with Policy ER 2.1.7. The proposed Project would remove 11 oak trees, as discussed on page 28, but these trees are not protected by the City's Heritage Tree Ordinance due to their size, and their removal would not compromise the integrity of the oak woodland, so the project would be consistent with Policy ER 2.1.8.

### **Response to Comment 3-15**

The study cited in the comment reported one Cooper's hawk during a Spring 2014 survey conducted by the Arcade Creek Project at one site (Site E, located near American River College).<sup>2</sup> No sightings of Cooper's hawk were reported in the Fall 2013 survey. The one sighting does not warrant a change to the classification of the potential for Cooper's hawk to be present from "low" to "moderate". Nonetheless, the potential for the proposed Project to affect Cooper's hawk is discussed on page 29 of the IS/MND and mitigation to protect nesting raptors, which could include Cooper's hawk, is provided on page 30 (Mitigation Measure BIO-2).

### **Response to Comment 3-16**

CEQA requires that mitigation be identified to avoid or lessen significant impacts; mitigation measures are not required for effects that are not found to be significant [CEQA Guidelines 15126.4(a)(1) and (3)]. As discussed on page 28 of the IS/MND, none of the trees that would be removed are over 7 inches dbh, so none are considered heritage trees under the City's Heritage Tree Ordinance. Further, the removal of these trees would not compromise or substantially degrade the oak woodland habitat. For these reasons, the removal of oak trees was not found to be a significant. Therefore, no mitigation is required or identified.

### **Response to Comment 3-17**

Please see Responses to Comments 2-2, 3-2, and 3-3.

### **Response to Comment 3-18**

Please see Responses to Comments 2-2 and 3-2.

### **Response to Comment 3-19**

The comment refers to an existing condition (failing culverts), which is not addressed by the proposed Project. The proposed Project would not worsen the condition of the culvert, so no improvements are necessary as part of the project. City staff will consider the comment during planning for future improvements within the park, in coordination with the Department of Utilities and regulatory agencies.

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<sup>2</sup> [arcadecreekproject.org](http://arcadecreekproject.org)

## ERRATA

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This Errata presents, in ~~strike through~~ and double underline format, the revisions to the Del Paso Regional Park Improvement Project Initial Study/Mitigated Negative Declaration (IS/MND) being provided for clarification. The revisions to the IS/MND reflected in this Errata do not affect the adequacy of the environmental analysis.

### Section II - Project Description, Project Background

Cover,  
Pages 1

and 2 The title of the project on the cover and pages 1 and 2 of the Draft Initial Study is revised as follows:

Del Paso Regional Park ~~Phase 4~~ Trail Improvements

Page 4: The following revision is made to the first line in the first sentence of the third paragraph:

Del Paso Regional Park is an approximately ~~445.6~~ 680-acre multiuse park...

Page 4 The following sentences are added to the end of the third paragraph under **Project Background**:

The 1985 Master Plan designates the majority of the project site as Natural Habitat Area. The easternmost portion of the project site is designated Neighborhood Park in the Master Plan.

Page 9 The second sentence in the third full paragraph is revised as follows:

The total area to be disturbed would be approximately 0.75 acre, and is not part of a larger common plan for development.