City of SACRAMENTO

INITIAL STUDY/
MITIGATED NEGATIVE DECLARATION

REICHMUTH PARK
PHASE 2 IMPROVEMENTS PROJECT

CITY OF SACRAMENTO, CALIFORNIA

February 2016

INITIAL STUDY/
MITIGATED NEGATIVE DECLARATION

REICHMUTH PARK
PHASE 2 IMPROVEMENTS 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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4533 Oxbow Drive
Sacramento, CA 95864

Project No. L19153101

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:

Reichmuth Park Phase 2 Improvements Project (#L19153101) - The project site is bounded by 43rd Avenue on the north, Gloria Drive to the west, residences and Silver Lake Drive to the south and residences fronting South Land Park Drive on the east.

The Project would update and replace several of the existing park facilities, and create a new disc golf course. The majority of the existing playground area facilities would be removed and replaced with the following components:

- Most of the area occupied by the existing Water Play Area would be planted in turf. Picnic tables on a concrete slab would be installed as well.
- The Adventure Play Area would be replaced by new playground equipment, including a fire station/truck feature with fire truck sounds, slides, and climbing elements. A new set of swings would also be installed. The surface would be replaced with approximately 12 inches of wood fiber.
- A Water Mister Area would be created in the area currently occupied by the Tot Lot. The Water Mister Area will have a fire fighter theme to match the other new playground equipment. The misters will include overhead and ground-based sprayers, and will use approximately 30 to 40 gallons per minute (gpm).
- The two ADA parking spaces would be improved and resurfaced.
- Signs would be installed, including interpretive and rule signs.

A new 18-hole disc golf course including baskets, concrete tee pads and signs would be installed. The disc golf course would require clearing of understory brush (approximately 30'x180') to create fairways with in the wooded 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, 3rd 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: 2/10/2016

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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.

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.

SECTION I - BACKGROUND

Project Name and File Number: Reichmuth Park Phase 2 Improvements Project (#L19153101)

Project Location: The project site is located within Reichmuth Park, which is bounded by Gloria Drive, 43rd Avenue, rear yards along South Land Park Drive, and Silver Lake Drive in south Sacramento.

Project Applicant: City of Sacramento

Project Planner: Jason Wiesemann, Landscape Architect,
Department of Parks and Recreation
915 I Street, Room 3000
Sacramento, CA 95814
Phone: 916-808-7634
E:mail: JWiesemann@cityofsacramento.org

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

Date Initial Study Completed: September 1, 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

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 October 1, 2015.

Please send written responses to:

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

SECTION II - PROJECT DESCRIPTION

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 and Setting

The project site is located within Reichmuth Park in south Sacramento, east of Interstate 5 (see Figure 1). Reichmuth Park is bounded by 43rd Avenue on the north, Gloria Drive to the west, residences and Silver Lake Drive to the south and residences fronting South Land Park Drive on the east (see Figure 2). The proposed Project site includes two components—playground-related improvements in the northwest portion of the park and a disc golf course in the central and southern portions of the park.

Reichmuth Park is an approximately 42-acre community park, originally developed in 1972. As shown in Figure 2, the park is generally divided into two components. Active park facilities, such as soccer fields, are located in the northern portion of the park and along its western edge. A large nature area is located in the southeastern portion of the park.

Active park facilities include a baseball diamond, soccer fields, restrooms, lighted tennis courts, basketball court, skate park, tennis courts, and a play area, which includes a large water feature (no longer functional), tot lot and Adventure Play Area (see Figure 3). The water feature and tot lot are known as the Koehler Play Area, which was dedicated in 1973. A parking lot is located adjacent to the water feature, tot lot and Adventure Play Area.

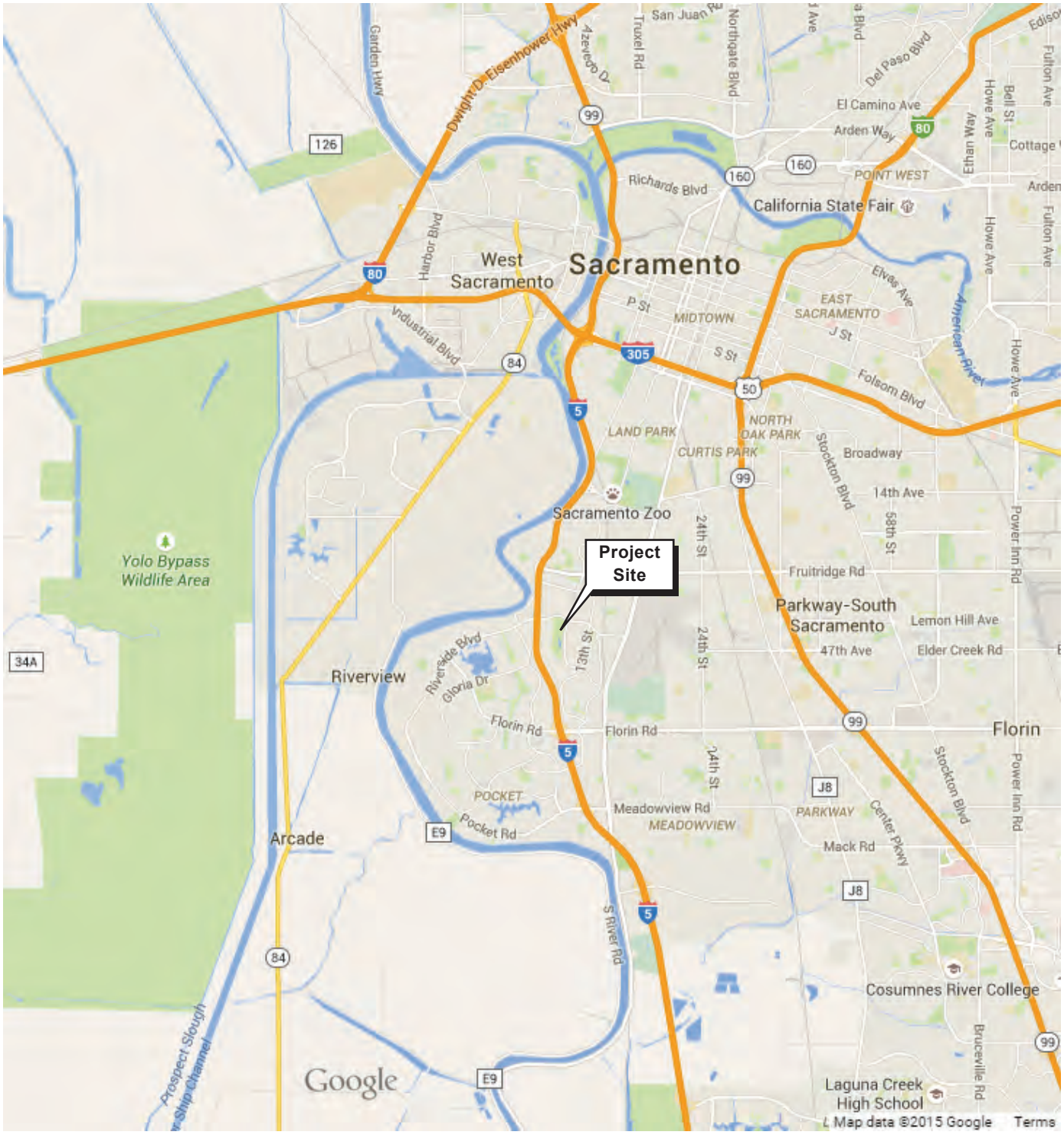
The nature area is composed of a large, continuous stand of mixed-oak riparian forest surrounding Mungers Lake, a small water body that collects local stormwater drainage and irrigation runoff. Park improvements within the nature area are limited to trails that provide connections to the northern, western and southern portions of the park. A 6- to 10-foot dirt trail runs north-south through the nature area.

The topography of the park is relatively flat, with a slight bowl shape. The eastern edge is bermed so that the homes on the eastern side of the park are higher than the center of the park.

Reichmuth Park is surrounded on all sides by suburban development. The backyards of single-family homes line the eastern and southwestern boundaries of the park. Apartments and condominiums are located to the west, across Gloria Drive, and north of the project site, across 43rd Avenue. A gas station and convenience store are located to the north, across 43rd Avenue.

The project site is designated Parks and Recreation in the 2035 General Plan, and is zoned R-1, which allows park uses.

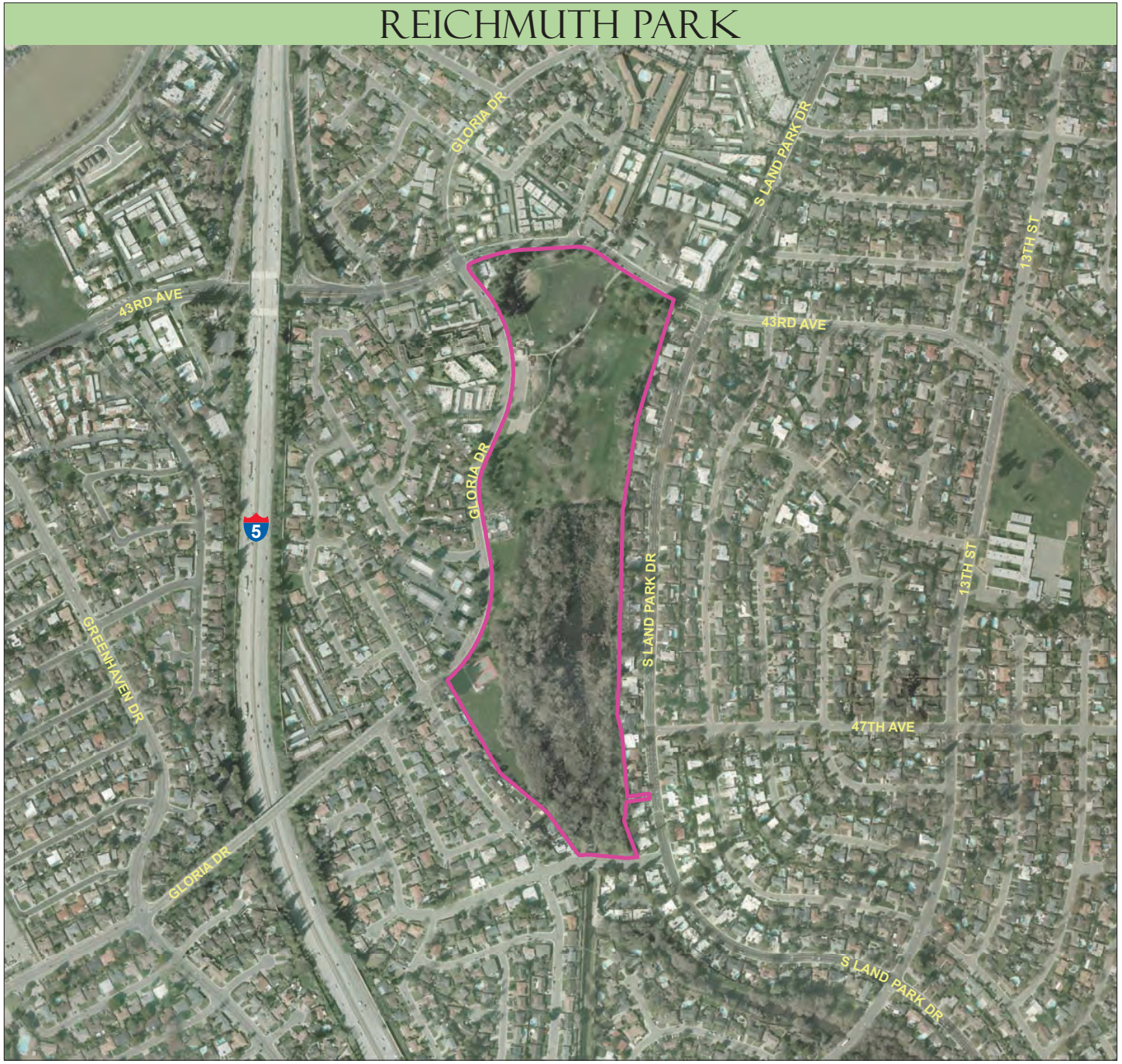
There are public facilities located on the periphery of the park. A fire station is located in the northwest corner of the park. Sump 55 is located on 43rd Avenue west of the skate park.



N
No Scale

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

Figure 1
Project Location



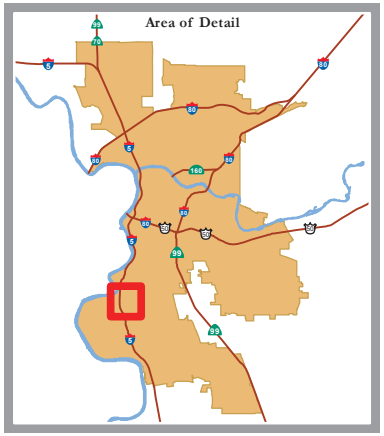


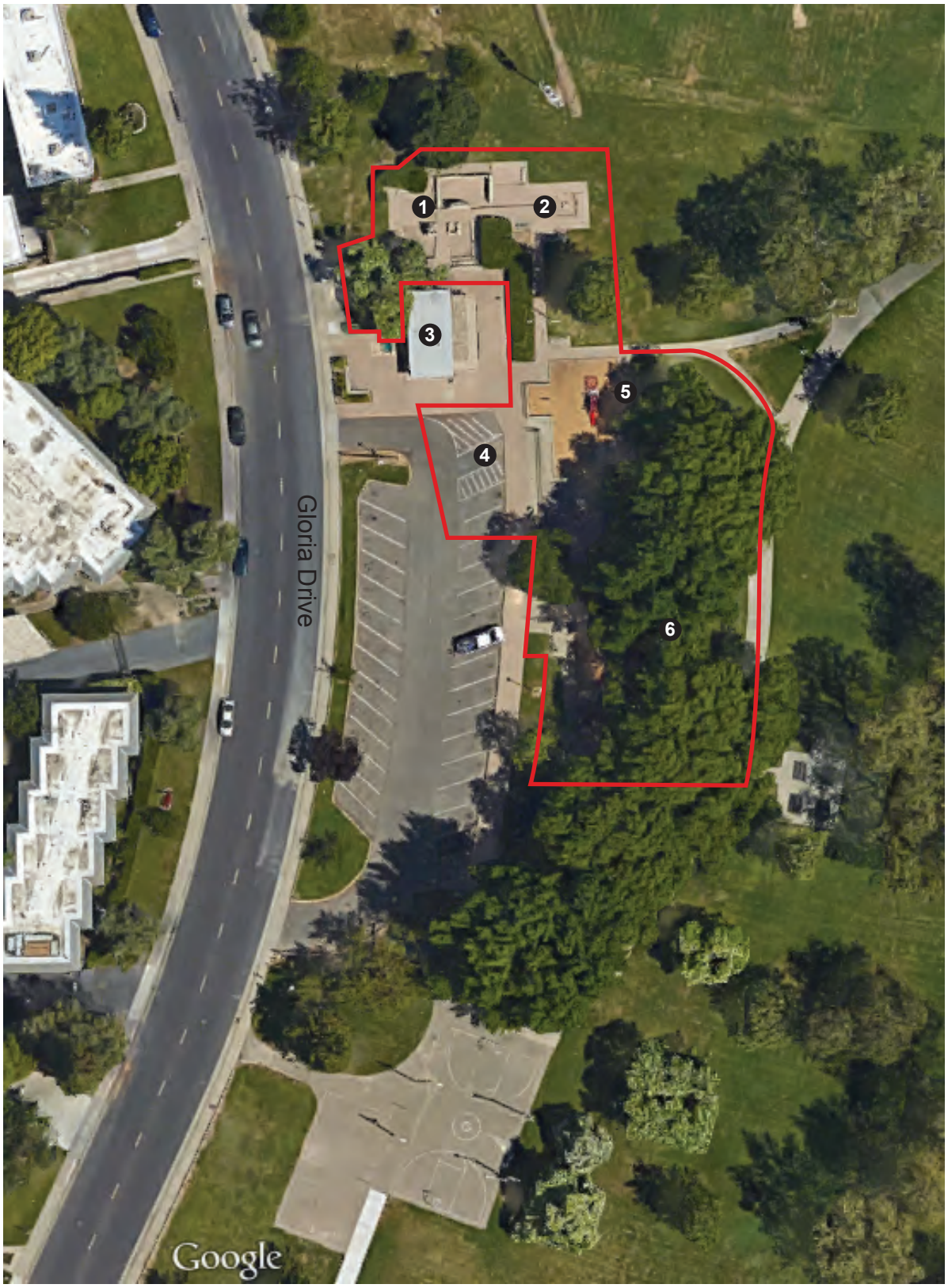
Figure 2
Project
Vicinity

SOURCE: City of Sacramento Dept. of Parks and Recreation, A.L. Graham and Associates, 2015; Aerial Photograph April 2009.

N

0 500 1,000

Feet



Project Boundary

1 Existing Water Play Area Replaced with Turf
2 Portion of Existing Water Play Area Replaced with New Accessible Picnic Tables
3 Existing Restrooms (No Change / Not Part of Project)
4 ADA Parking Spaces to be Improved and Resurfaced
5 Existing Tot Lot Replaced with Water Mister
6 Existing Adventure Area to be Replaced with New Playground Equipment

N

No Scale

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

Figure 3
Project Components: Playground Area

Sump Station 65 is located adjacent to Silver Lake Drive, and collects stormwater and then pumps it to the South Sacramento Drainage Canal to the south of Silver Lake Drive. The soccer fields and surrounding turf areas function as a detention basin during storm events.

Project Background

A Master Plan for Reichmuth Park was adopted by the City in 2008, and identified a number of improvements for the park, including a water mister area, additional walkways, a demonstration garden, interpretive signs, expansion and lighting of the parking lot, a skate park, an additional soccer field, a relocated basketball court and tennis court parking lot with lights and gates. Phase 1 of the improvements has been completed with the construction of the skate park and associated hardscape and landscape improvements. The proposed Project would implement the second phase of improvements with replacement of outdated playground equipment, installation of the water mister area and parking lot improvements. The disc golf course, which is also part of the proposed Project, is not identified in the Master Plan, but was added to the Parks and Recreation Department 2014-2019 Capital Improvement Program, which was approved by City Council in June 2014.

PROJECT DESCRIPTION

The proposed Project would update and replace several of the existing park facilities, and create a new disc golf course. Each of the project components is described below. Figure 3 shows the location of the improvements within the playground area, and Figure 4 shows the location of the disc golf course improvements.

Removal of Existing Facilities

The majority of the existing playground area facilities would be removed, as follows:

- The entire existing Water Play Area located at the north end of the playground area would be dismantled and removed. The water lines would be capped and reused for the water mister area.
- The play structure, fire engine structure, swing sets and spring animals would be removed from the existing Tot Lot and Adventure Play Area. The existing surface, about 12-inches of wood fiber, would be removed.
- Wooden benches adjacent to the playground would be removed.
- Concrete ramps, footings and curbs would be removed.

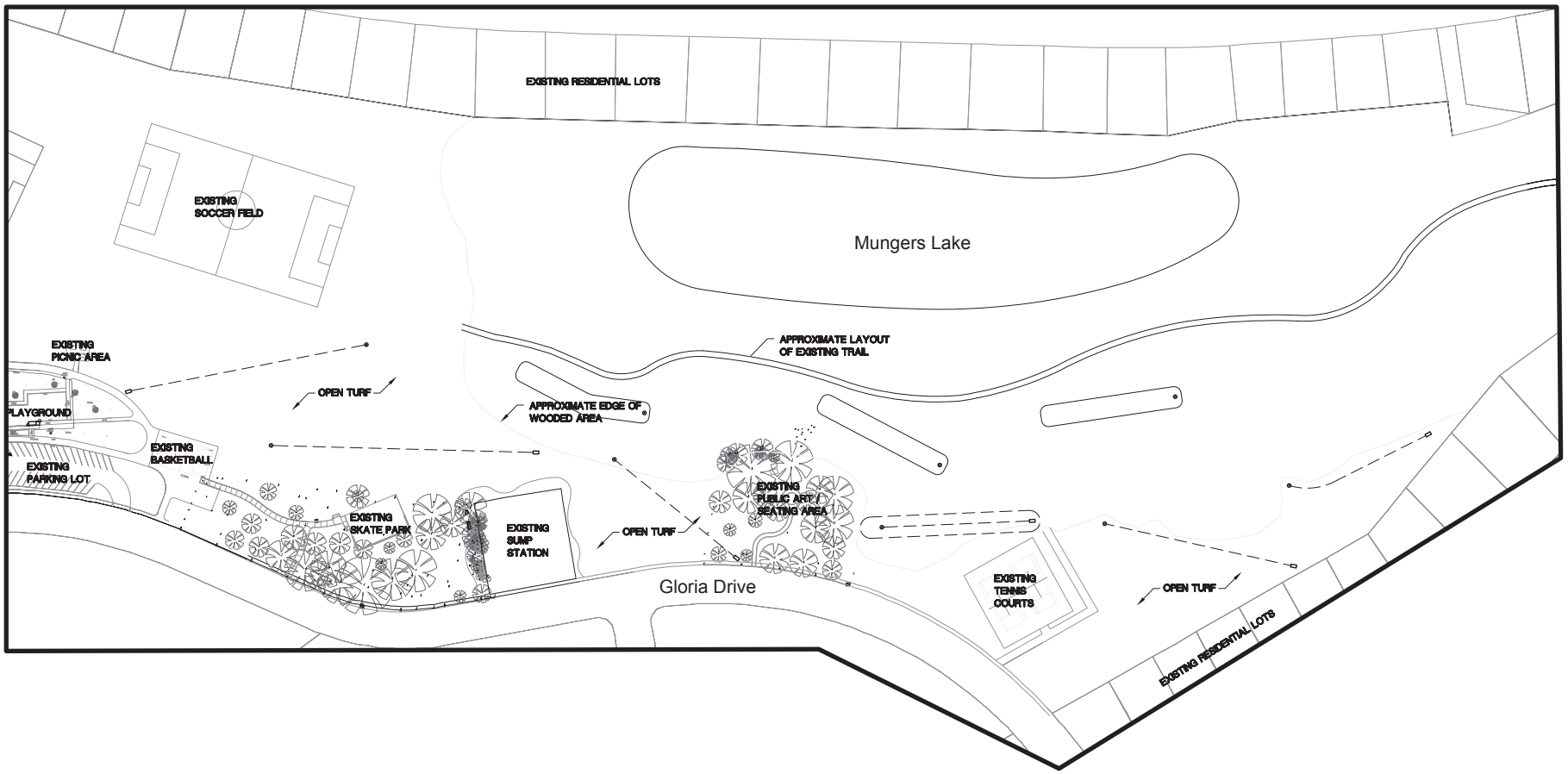
No existing facilities would need to be removed for the disc golf course.

Vegetation Removal

No trees would be removed to accommodate the new play structures and features. However, two trees would be removed due to poor condition, as recommended by a professional arborist.[1]

The disc golf course would require removal of vegetation between and around the tees, fairways and baskets. No trees over 3 inches in diameter at breast height (dbh) are planned to be

1. Abacus Consulting Arborists, *Consulting Arborist Report prepared at the request of the City of Sacramento for the Reichmuth Park Playground*, February 24, 2015.



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

Figure 4
Project Components:
Disk Golf Course (9 Holes)

removed solely to accommodate the placement of the disc golf course facilities. However, an arborist evaluated the trees in proximity to the golf course alignment, and recommended that certain trees be avoided or removed due to poor condition. It is anticipated that 4 to 7 trees that exceed 3-inches dbh would be removed to comply with the arborist's recommendations.

New Facilities

The playground area would be reconfigured with the following improvements:

- Most of the area occupied by the existing Water Play Area would be planted in turf. Picnic tables on a concrete slab would be installed as well.
- The Adventure Play Area would be replaced by new playground equipment, including a fire station/truck feature with fire truck sounds, slides, and climbing elements. A new set of swings would also be installed. The surface would be replaced with approximately 12 inches of wood fiber.
- A Water Mister Area would be created in the area currently occupied by the Tot Lot. The Water Mister Area will have a fire fighter theme to match the other new playground equipment. The misters will include overhead and ground-based sprayers, and will use approximately 30 to 40 gallons per minute (gpm).
- The two ADA parking spaces would be improved and resurfaced.
- Signs would be installed, including interpretive and rule signs.

A new 18-hole disc golf course including baskets, concrete tee pads and signs would be installed. Initially, only 9 baskets would be installed, 4 of which would be located within the nature area, as shown in Figure 4. The layout for the additional 9 baskets is not known at this time, but to be conservative, it is assumed that all would be located within the nature area, because impacts would be greatest there. The disc golf course would require clearing of understory brush (approximately 30'x180') to create fairways with in the wooded area. It is anticipated that 4 to 7 trees would be removed to make room for the golf course and/or due to the recommendation of the arborist, based on the condition of the trees. An additional approximately 6 trees would be trimmed. The second 9 holes would require additional tree removal and/or trimming. The specific trees that would be determined during planning for the second 9 holes.

Figure 5 provides a schematic drawing of the baskets.

The entire project would require approximately 45 working days, or about 2 months, including removal of existing facilities, installation of new facilities and landscaping.

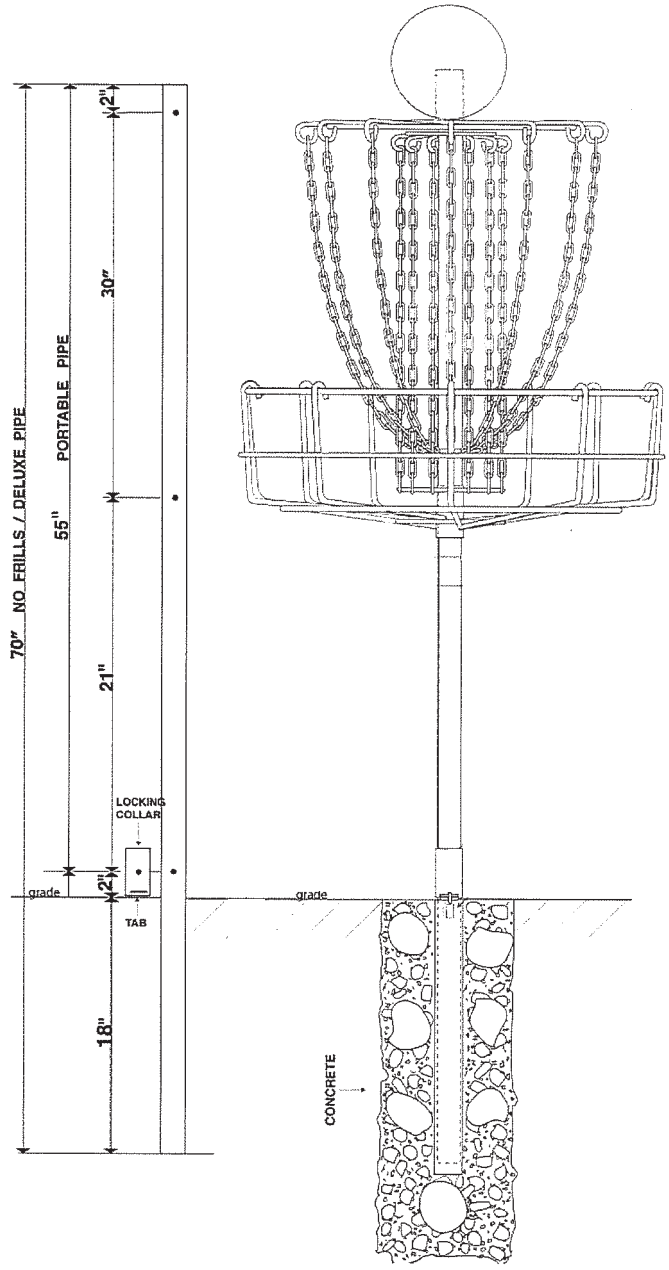
CONSTRUCTION EQUIPMENT

The construction staging area would be located within the parking lot. Typical construction equipment would include the following:

- Crane (if needed for tree removal),
- Backhoe,
- Excavator,
- Concrete saw,
- Cement truck,
- Paver,
- Rollers,

- Motor grader,
- Dump truck, and
- Light tools (i.e. saws, jackhammer).

All construction work for the project will comply with the City of Sacramento Standard Construction Specifications (or Best Management Practices).



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

Figure 5
Disk Golf Basket
Cross Section

Section III – Environmental Checklist and Discussion

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 could 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 could, however, generate changes in retail demand or demand for governmental services, and the demand for housing could 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 community park. The proposed Project would replace existing playground equipment, and add a mister area, install a disc golf course, and resurface ADA parking. All of these recreational facilities are consistent and compatible with the existing park uses.

The proposed Project would be constructed in two separate areas of Reichmuth Park. The replacement of the playground equipment and installation of the mister play area would be located within the existing playground area in the northwest of Reichmuth Park. This site is surrounded by ball fields and other active park facilities to the north, east and south, and the parking lot and restrooms to the east. The nearest residential development is the multifamily uses to the west, across Gloria Drive. The disc golf course would be located in the southwest portion of Reichmuth Park. A portion of the course would be located within the nature area; the remainder would be located within the existing turf areas. For these reasons, the proposed Project 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.[2] 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 within the project site, and power for the water mister pumps. Therefore, the proposed Project would not result in any impacts not identified and evaluated in the Master EIR.

2. 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. AESTHETICS, LIGHT AND GLARE 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 community park with recreation and sports facilities distributed in and around large expanses of turf (see Figure 6). The park is visible from the adjacent streets and residential areas to the west. Views of the park are blocked from South Land Park Drive by residences. The backyards of those residences border the park, but views from most of the backyards are blocked by standard wood fencing. Landscape trees are evident around the edges of the park, and are scattered throughout the northern and eastern portions of the park (outside of the sports fields), as shown in Figure 7.

The nature area is densely wooded, so the interior of the nature area is not visible from other portions of the park (see Figure 8). Within the nature area, views from the trail are of cottonwoods, oak trees and other trees, which form a canopy above the trail (see Figure 9). Mungers Lake and a drainage canal are located within the nature area, but views of these features are obscured from most areas by trees.

The play area consists of playground equipment (see Figure 10) and a Water Play Area composed entirely of concrete (see Figure 11). As shown in Figure 10, trees surround the playground on three sides, so it is well shaded. The play area is easily visible from the parking lot and Gloria Drive.

Views from the play area include the restrooms, the parking lot, and Gloria Drive to the west, the sports fields to the north and east, backyard fences to the east and the skate board ramps, turf, ornamental trees and the edge of the nature area to the south.

The sports fields are lit, and there are light posts throughout the developed portion of the park. There are no light sources within the nature area.

Figure 6: Play Field

Figure 7: Trees in Central Portion of Reichmuth Park

Figure 8: Nature Area as Seen from Developed Portion of the Park

Figure 9: Trail within Nature Area

Figure 10: Existing Playground Equipment

Figure 11: Water Play Area

Standards of Significance

The significance criteria used to evaluate the project impacts related 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

- 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. Although there are lights within areas of Reichmuth Park, the proposed Project does not provide for any artificial lighting.

The proposed Project would consist of playground equipment, turf, landscape materials and disc golf course baskets. None of these features are expansive enough to produce glare. No artificial lighting would be installed as part of the project. Because the project does not include any materials that would produce glare or any artificial light impact, there would be ***no impact***.

C. Visual Character

As described above, the proposed Project would replace existing recreational facilities within a community park setting. While the new facilities would differ somewhat from those that are replaced, they would be in keeping with the visual elements of a developed park. Turf would replace the concrete Water Play Area, and new playground equipment and a water mister area would replace the existing playground equipment. Views of the play area would therefore not substantially change. The resurfacing of the ADA parking spaces would not alter visual character of the parking lot.

The disc golf course would be located within both the developed portion of the park and the nature area. Some vegetation and tree removal and thinning would be required within the nature area, but the area would still appear densely vegetated from outside the nature area (as shown in Figure 8) and from the trails within the nature area. The disc golf course tees, signs and baskets would add new visual elements to the park, but these features would be visually unobtrusive (see, for example, Figure 5 for an illustration of the basket), and signage and small-scale features (e.g., signs, rope swings, benches) are common in both the park and the nature area at present. 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
2. AIR QUALITY *Would the proposal:* A) Result in construction emissions of NO_x above 85 pounds per day?		X	
B) Result in operational emissions of NO_x 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_{10} 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_{10}) and under 2.5 microns ($PM_{2.5}$). The County is also in nonattainment for ozone and PM_{10} under the federal standards. [3]

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_x above 85 pounds per day;
- operational emissions of NO_x 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_{10} 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_x and ROG are below the emission thresholds given above, then the project would not result in violations of the PM_{10} 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 preference to contractors using reduced-emission equipment. The Master EIR found that these

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

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.[4]

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 demolition of buildings, trenching, a compact schedule or cut and fill activities. The existing playground structures and fountain would be dismantled and removed, but this would not generate the level

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

of emissions associated with building demolition. The project would require import of landscaping material, 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 NOx 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 NOx

After project construction is complete, air emissions will be very low. The proposed Project would not increase the number of parking spaces or the size of the playground area, so there would not be a corresponding increase in traffic to that area. The disc golf course would be a new facility that could attract a new population to the park, but such use would be intermittent and would be a small percentage of overall park use. Maintenance of the improvements would be part of regular, ongoing maintenance for Reichmuth Park. No electricity or natural gas would be required for project operation except for the water mister system. 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 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. Use of the playground facilities and disc golf course would not generate any emissions in and of themselves (see Item B. for a discussion of traffic-related emissions). 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_{10} 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-1, do not have the potential to exceed the thresholds for PM_{10} or $PM_{2.5}$[5]. 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 CO from trucks and construction equipment powered by gasoline and diesel engines 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

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

construction site and detour area, but only for a short period of time (less than 4 months). The amount of congestion in the project vicinity would not be great enough to exceed CO thresholds, even with project traffic. Further, the proposed Project includes Mitigation Measures AQ-1 and AQ-2 to ensure that local roads are not affected by idling vehicles and congestion due to construction traffic. After construction, there could be intermittent increases in traffic due to the new disc golf course. However, use of the course is likely to occur in the evenings and weekends, when traffic levels on local roads would be reduced. Therefore, the proposed Project would not cause local intersections to become so congested that CO levels would exceed applicable standards. Therefore, the proposed Project would have a ***less-than-significant impact*** on CO emissions.

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 approximately 150 feet west 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.

G. 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, except for minor traffic emissions from people driving to the park. 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

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 threshold. 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
3. BIOLOGICAL RESOURCES Would the proposal: 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?			X
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?		X	
C) Affect other species of special concern to agencies or natural resource organizations (such as regulatory waters and wetlands)?		X	

ENVIRONMENTAL SETTING

The following discussion is taken from the *Reichmuth Park Phase 2 Improvements Biological Resources Evaluation, Sacramento, California,* prepared by Bumgardner Biological Consulting (January 2015). The biological resources evaluation included a field survey conducted on January 12, 2015. Table 1 in Appendix B identifies the special-status species that have the potential to occur and/or are known to occur within the project area.

The northern portion of the project site, where the play area is located, is composed of turf and exotic landscaping. No vegetation that is natural to the region is located in this area.

The southern portion of the project site, within the nature area, supports a large, continuous stand of mixed oak-riparian forest. The overstory in this area is dominated by valley oak (*Quercus lobata)*, interior live oak (*Q. wislizeni*), willows (*Salix* spp.), and California wild grape (*Vitus californica).* The understory is dominated by Himalayan blackberry (*Rubus armeniacus)* and *California rose (Rosa californica).* The nature area forms an ecological island within urban development. The nearest natural habitat is located approximately 0.4 miles west of Reichmuth Park, along the Sacramento River.

Mungers Lake is located within the mixed oak-riparian forest, and collects local stormwater drainage and irrigation runoff. It supports small, localized stands of cattail (*Typha* sp.) and duckweed (*Lemma* sp.), but little else of submergent or emergent aquatic plants.

There are no wetlands or other waters subject to the jurisdiction of the US Army Corps of Engineers or California Department of Fish and Wildlife (CDFW).

No State or federally listed plant species were observed in or adjacent to the reconnaissance-

level survey. As indicated in Table 1, there is one special-status plant species that could occur

within the project area--northern California black walnut (*Juglans hindsii)*. California black walnut is a relatively common element of low-elevation woodland communities, particularly riparian communities. This plant is a CNPS List 1B.1 species, which means that it is considered rare, threatened or endangered in California and elsewhere. The reconnaissance survey was conducted outside of the blooming and leaf-out period for this species, which could preclude identification.

There are several special-status wildlife species that could occur within the project site, specifically 5 bird species [Cooper's hawk (*Accipiter cooperii)*, Swainson's hawk (*Buteo swainsoni)*, Nuttall's woodpecker (*Picoides nuttallii*), Oak titmouse *(Baeolophus inornatus)* and song sparrow ("Modesto" population, *Melospiza melodia mailliardi*] 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 the nature area. Oak titmouse, also a CDFW special animal, has been recorded within the nature area, but was not observed during the field survey. Both of these species are expected to nest within the nature area, although there are no records of observed nests for either.

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. There are over 30 records each of sightings of Cooper's hawk and Swainson's hawk within the nature area between 1994 and 2015. The "Modesto" population of song sparrow has an affinity for emergent freshwater marshes dominated by tules and cattails and riparian willow thickets. 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.

Two arborists reports were also prepared for the proposed Project by Abacus Consulting Arborists for the play area (February 24, 2015) and the nature area (February 25, 2015). For the play area, 7 trees were evaluated. The trees included 4 Chinese Evergreen Elm, 1 Pin Oak, 1 Tulip Tree and 1 Catalpa. The Catalpa and Tulip Tree were recommended to be removed. Of those, 2 trees (the Catalpa and the Tulip tree) were rated 2 (poor) and the remaining 5 were rated 3 (fair). Recommendations were provided for the removal, replacement and pruning of the trees.

For the nature area, 171 trees were assessed, including 25 Western Cottonwood, 120 Valley Oak, 9 Box Elder, 3 Gooddings Willow, 1 Eucalyptus and 2 unidentified species. Of these, 134 trees were subjected to a "Level 1" inspection, which is a limited visual assessment of a population of trees in order to identify individual trees with a probably or imminent likelihood of failure. The remaining 37 trees were subjected to a "Level 2" inspection, which is a ground level assessment of the conditions and defects that are readily visible. Of the trees subjected to the Level 2 inspection, 10 were rated 1 (dangerous/non-correctable), 22 were rated 2 (poor) and 5 were rated 3 (fair). Recommendations were made regarding the avoidance, removal and/or pruning of the 37 trees. The arborist recommended that (1) all trees rated 1 be removed, (2) that a 100-foot diameter zone of no heavy foot traffic be provided for western cottonwoods, and (3) that trees that were not subjected to a Level 2 analysis but would be included in a heavy foot traffic area should be re-evaluated at a Level 2 or 3 inspection. Specific recommendations were also made for pruning and protection of trees to be retained.

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 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:

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.

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. Staging would occur in the parking lot, which drains to the street, so there would be no risk of a spill reaching the play area or nature area. Therefore, there would be ***no impact***.

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

As discussed above, the vegetation within the play area is not native to the area, and includes turf and trees. The two trees characterized as in poor condition by the arborist would be removed as part of the proposed Project. The remaining five trees would be retained. After construction, the play area would be re-landscaped, including the installation of turf where the concrete play feature is currently located.

The disc golf course site includes both turf and a portion of the nature area. Five of the first nine holes would be located within the turf area, and would not require the removal of any trees or groundcover, except in the immediate vicinity of the baskets. Four holes would be located in the nature area. The understory would be cleared for an area of approximately 30-feet by 180-feet, about one-third acre in total. If and when an additional 9 baskets are constructed, there could be additional vegetation removal, the extent of which would depend on how many baskets were sited within the nature area. As noted above, the understory of the nature area is composed primarily of Himalayan blackberry and California rose, neither of which are special-status species. However, California black walnut, which is a CNPS 1.B.1 species, could be present. Project construction could damage or destroy this species if it occurs within the area being cleared. Although the impact on plant species would be less than significant because it is not a listed species, mitigation is recommended for protocol surveys, 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 this plant species.

There are no wetlands within the project area, and the proposed Project would not encroach on Mungers Lake.

The proposed Project would also require removal of trees to ensure safety within the fairways and to clear areas for play. The fairways would be designed to avoid the removal of trees that are rated 3 or better and/or larger trees. At this time, it is assumed that 4 trees rated 1 or 2 would be removed per the Arborist's recommendations, because they are located within the proposed fairways. An additional 3 trees that are rated 1 may be removed as well. The species of the trees that could be removed are:

- 3 Gooddings willow *(Salix gooddingii),*
- 1 valley oak (*Quercus lobata*),
- 2 Western cottonwood (*Populus fremonti),* and
- 1 Unidentified interior live oaks (*Quercus wislizenii*).

None of these trees qualify as a "heritage tree", because of their poor condition, and, with one exception (a western cottonwood with a 45" dbh), these trees do not meet the dbh criteria. No healthy trees would be removed.

In addition to removal of trees in poor health, the canopies of several western cottonwoods

would be reduced as recommended by the arborist to create a 100-foot diameter zone free of branches. Tree pruning and construction activities in the vicinity of trees to be retained could damage the health of these trees by improperly cutting limbs and/or disturbing the trees' root zones. If there were substantial loss of trees within the nature area, it could diminish the quality of the forest. The area to be affected by the 4 fairways that will be located within the nature area initially (with the first 9 fairways) would disturb a relatively small area (less than one-third of an acre). The location of the second 9 fairways has not been determined, but at least some would likely be located within the nature area, which would increase the potential area of disturbance. In addition, trees that are in poor health could pose a danger to people walking in the area. Implementation of arborist's recommendations for removal, pruning and protecting trees in the nature area would ensure that the impact related to trees would be ***less than significant*** by removing trees in poor condition that are located in areas that would be heavily trafficked, ensuring that pruning is done in a manner that would protect the health of trees, and protecting trees from construction and other project activities.

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 one CNPS plant species, northern California black walnut, discussed above.

The project site and surrounding area also include potential habitat for several wildlife species, including 2 raptor species, 3 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.

After the project is constructed, there would be no additional disturbance beyond the maintenance and recreation activities that currently occur within the park and fairways, and park users. The playground area would be subject to similar use as under current conditions. The disc course would increase activity in the nature area, but disc golf is a relatively quiet, low impact activity that would not disturb wildlife. Therefore, there would be no substantial 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 (Tree Removal and Protection)

A. The recommendations provided in February 2015 arborist reports shall be implemented, including:

    1. Trees located within a fairway or other high traffic area within the project area and that are rated 0 or 1 shall be removed.

2. A 100-foot diameter zone where there will be no public foot traffic shall be provided around all Western Cottonwood trees within the project site, as recommended in Chart B of the arborist report.

3. If the fairways or other heavily trafficked project components would include any trees that are not included in Chart B, those tress shall be re-evaluated using Level 2 or 3 inspection. If any such trees are rated 0 or 1, they shall be avoided or removed.

B. Prior to siting the second 9 fairways, additional Level 2 or 3 inspections of trees within the potential fairway or other heavily trafficked areas shall be conducted by a qualified arborist. The recommendations of the arborist for the removal or avoidance of dangerous limbs or trees and the protection of trees to be retained shall be implemented. To the extent feasible, oak trees with a 11.5-inch dbh or greater and other trees with a 32-inch dbh or greater that are healthy (i.e., rated 3 or better) shall not be removed.

C. The "General Recommendations during Development" in the February 2015 arborist report shall be implemented for all trees within the project area that will be retained.

Mitigation Measure BIO-2 (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 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 Reichmuth Park nature area. 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-3 (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 3 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 nesting song sparrows or 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-4 (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. CULTURAL RESOURCES 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 2035 General Plan Background Report identifies areas that are considered of high and moderate sensitivity for archaeological resources. The project site falls within an area designated as "high" sensitivity according to the General Plan Background Report.[6]

There are no buildings within the project site. There are several structures, including the Koehler Play Area and playground equipment. Reichmuth Park was dedicated in 1972 and the Koehler Play Area was designed by a City of Sacramento Landscape Architect in 1973, so none of the existing structures are over 45 years of age (the age at which it is recommended that buildings and structures be evaluated for historic significance[7]). The City of Sacramento Preservation Director has made a preliminary determination that the Koehler Play Area is not eligible as a historical resource for CEQA purposes.[8]

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. Two recorded prehistoric-period cultural resources (P-34-104 and P-34-248) and 1 record of a historic-period cultural resource (P-34-3484) were found within the search area. According to the NCIC, there is a high potential for identifying prehistoric-period cultural resources and a low potential for identifying historic-period cultural resources within the project area. Additional archival and/or field study was recommended.[9]

Paleontological resources, such as fossil remains, can be present in fossil bearing soils and rock formations. The City of Sacramento and surrounding area are not known to have abundant

6. City of Sacramento, *Sacramento 2035 General Plan Draft Background Report*, August 2014, Figure 6.4-1.
7. North Central Information Center, *Records Search Results for Reichmuth Park Phase 2 Improvements,* NCIC File No.: SAC-15-75b, May 1, 2015.
8. Roberta Deering, Preservation Director, City of Sacramento, electronic communication to Dana Mahaffey, City of Sacramento Associate Planner, June 4, 2015.
9. North Central Information Center, *Records Search Results for Reichmuth Park Phase 2 Improvements,* NCIC File No.: SAC-15-75b, May 1, 2015.

paleontological resources, although there have been some discoveries.[10]

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, including tribal, 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.

ANSWERS TO CHECKLIST QUESTIONS

As discussed above, the project site is not considered likely to contain historic or paleontological resources. The features that would be removed from the play area are not considered historically significant. The project site is considered highly sensitive for prehistoric archaeological resources, which, if present, could be damaged or destroyed during construction activities such as excavation. Within the play area, all work will be done within the existing footprint, which has already been disturbed. The ADA parking will be treated with a 2-inch overlay, which will not require excavation. Each of the 9 golf baskets will require excavation of a hole 1 foot wide and 2 feet deep. Five of the baskets will be placed in the turf area, which has been disturbed for construction of the park. The remaining 4 golf baskets will be placed in the nature area, which has been subject to less past disturbance than the turf and play areas. If

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

any archaeological resources are present on the surface, they could be disturbed during vegetation removal. Because most of the project area has been disturbed in the past, and the amount of subsurface disturbance that would result from the project would be minimal, the City has determined that a cultural resource study is not warranted for the proposed Project.

While it is unlikely that project activities would encounter cultural resources due to the minimal amount of excavation within undisturbed areas, the potential cannot be ruled out. 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

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
5. GEOLOGY AND SOILS 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?			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[11]. The known faults nearest the project site are the Foothills fault system to the east of Sacramento, the Midland Fault to the west, and the Dunnigan Hills Fault to the northwest.[12] The project site is within an area that could experience 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.[13]

The site does not contain unique geologic or physical features.

Three soils have been mapped within the project site:

- Egbert Clay, partially drained, 0 to 2 percent slopes,
- Egbert-Urban land complex, partially drained, 0 to 2 percent slopes, and
- Xerarents-San Joaquin complex, 0 to 1 percent slopes.[14]

The Egbert clay and Egbert-Urban soils, which underlay the western side of play area and turf areas and the nature area, are poorly drained and typically composed of clay in the upper 18 inches and silty clay loam in at 18 to 46 inches. The Xerarents-San Joaquin complex, which underlays the eastern portion of the play area and ball fields, is well drained and typically composed of fine sandy loam in the upper 13 inches and loam at 13 to 30 inches.[15]

11. California Department of Conservation, Regional Geological Hazards and Mapping Program, www.conservation.ca.gov/CGS/Regional Geological Hazards and Mapping Program/AP, accessed May 21, 2015.
12. City of Sacramento, *Sacramento 2035 General Plan Draft Background Report*, August 2014, page 7-2.
13. City of Sacramento, *Sacramento 2035 General Plan Draft Background Report*, August 2014, page 7-4.
14. Natural Resources Conservation Service, *Custom Soil Resource Report for Sacramento County, California, Reichmuth Park,* June 12, 2015.
15. Natural Resources Conservation Service, *Custom Soil Resource Report for Sacramento County, California, Reichmuth Park,* June 12, 2015.

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. The underlying geology of the site and the site soils could affect the stability and durability of constructed project features, particularly if the soils are subject to shrinking and swelling, expansiveness or similar characteristics. As required by General Plan Policy EC 1.1.2, a geotechnical investigation will be required to evaluate the potential geologic or soils conditions that are specific to the project site, and the extent to which those conditions could affect the stability and durability of project facilities. 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.***

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
6. HAZARDS Would the project: A) Expose people (e.g., residents, pedestrians, construction workers) to existing contaminated soil during construction activities?		X	
B) Expose people (e.g., residents, pedestrians, construction workers) to asbestos-containing materials or other hazardous materials?		X	
C) Expose people (e.g., residents, pedestrians, construction workers) to existing contaminated groundwater during dewatering activities?			X

ENVIRONMENTAL AND REGULATORY SETTING

The project site has been a park since the early 1970s. The project site is not on any list of hazardous materials sites compiled by the State of California (e.g., the Cortese list).[16] There is a leaking underground storage tank (LUST) site located north of Reichmuth Park, across 43rd Avenue. Two gasoline underground storage tanks were removed from the site in May 1989, and contaminated soils were removed at that time from the site. Petroleum-based constituents were found in groundwater samples at the time. A groundwater monitoring well was installed within Reichmuth Park (northeast of the project site). Soils sampled at this location in 2008 did not show presence of organic vapors and the only contaminant that exceeded reporting limits was lead, which was reported to occur at levels of 8.1 mg/kg at 3 feet below ground surface. The LUST site is still classified as "open".[17]

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.

STANDARDS OF SIGNIFICANCE

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

16. California Department of Toxic Substances, *Envirostar Database*, accessed June 4, 2015.
17. Geo Tracker, TOSCO #6281 (T0606700288), Summary, accessed June 23, 2015.

- expose people (e.g., residents, pedestrians, construction workers) to existing contaminated soil during construction activities;
- 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 found to be 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 park facilities could be exposed. The staging area, which is where fuels and other chemicals would be stored and most likely to be spilled, would be located in the parking lot, which drains into the local stormdrain system. If contaminants were allowed to migrate through stormwater into the local drainage system, they could degrade local water quality. However, the proposed Project would be subject to an erosion control plan and implement best management practices (BMPs) to prevent the migration of soils or contaminants outside of the staging area. These measures would protect the surrounding areas from any fuels or other contaminants that might be 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 park (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. As discussed above, the only known contaminated site within the project vicinity is located to the northeast. The primary concern with the contamination from underground tanks leaking

gasoline is groundwater, which would not be encountered at the depth of excavations associated with project construction. Further, the proposed Project would use treated water from the City's water system, rather than groundwater from the project site. . While some lead was identified in soils at 3 feet below ground surface, the reports do not indicate that it has migrated to the project site, and the proposed Project would not excavate to that depth. Therefore, the risk of exposure to known contaminants is slight to nonexistent. However, there is always the possibility that unknown contaminants could be present.

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 buildings on the project site. The water feature was constructed in 1973, but is concrete and unlikely to have been insulated, which will be confirmed in the geotechnical report discussed in Item 5, Geology and Soils. If asbestos were present, it would be removed pursuant to applicable laws and regulations and Mitigation Measure HAZ-1. Therefore, this impact would be ***less than significant***.

C. Exposure to Contaminated Groundwater

The proposed Project involves grading, but no deep 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

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. HYDROLOGY AND WATER QUALITY 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 located east of the Sacramento River. Several components of the local drainage system are located in the vicinity of the project site. Sump 55 is located on 43rd Avenue west of the skate park. Sump 55 is owned and operated by the City. Sump Station 65 is located adjacent to Silver Lake Drive, and collects stormwater and then pumps it to the South Sacramento Drainage Canal to the south of Silver Lake Drive. The soccer fields and surrounding turf areas function as a detention basin during storm events.

The parking lot drains to the stormdrain system in Gloria Drive. The remainder of the project area drains to inlets located within the park, which connect to the CWCS.

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.[18]

Impervious surfaces within the project site, primarily the ADA parking spaces and the concrete fountain, drain to the City's stormdrain system. Pervious surfaces include landscaping material and turf. None of these areas are likely to contain the chemicals that exceed standards for the

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

Sacramento River.

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.[19]

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 project site is located in an area that is protected from the 100-year flood by a levee system. A 100-year flood is the flood event that has a 1 percent chance of occurring in any year.

As stated above, the project site is largely composed of turf and landscape material, which would not generate large volumes of runoff. The small areas of impervious surface, primarily the concrete fountain and the ADA parking spaces, drain to the City's drainage system.

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,

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

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:

Policy 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.

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 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, which would then enter the City's stormwater drainage system. 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. The erosion control plan would protect water quality and ensure compliance with General Plan Policy ER 1.1.7. In addition, Mitigation Measure HAZ-1 in Item 6, Hazards, requires containment and clean up of any spilled contaminants.

After the project is constructed, the only source of contaminants in stormwater would be vehicles parking in the ADA spaces. While the proposed Project would resurface these sites, it would not increase the number of spaces, so the potential for contamination would be the same as existing conditions. The remainder of the project site would be primarily turf and landscaping material, which would not be a source of contaminants beyond those currently used for landscape maintenance.

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

B. Flooding

As stated above, the project site is located in an area that is protected from the 100-year flood by existing levees. The project site is not located within a floodway. Reichmuth Park is used as a detention basin during the rainy season, but none of the project features are large enough to displace stormwater or reduce the capacity of the basin. The proposed Project would not increase the amount of impervious surface, so there would be no increase in stormwater runoff as the result of the Project.

The proposed Project would not in and of itself substantially increase the number of people who use Reichmuth Park, because it is primarily replacing existing facilities. Some additional use could result from the new disc golf course. 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 and Water Quality.

Issues:	Effect will be studied in the EIR	Effect can be mitigated to less than significant	No additional significant environmental effect
8. NOISE Would the project: 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?			X
B) Result in residential interior noise levels of 45 dBA L_{dn} or greater caused by noise level increases due to the project?			X
C) Result in construction noise levels that exceed the standards in the City of Sacramento Noise Ordinance?			X
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?			X
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?			X
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?			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 local roadways, including 43rd Avenue.

The closest noise-sensitive receptors are the residential buildings across Gloria Drive. These buildings are separated from the project site by the two-lane road and building setbacks. The distance between the project site and the closes residential buildings is approximately 150 feet.

The City General Plan states that the normally acceptable noise level for playgrounds and neighborhood parks is 70 dBA Community Noise Equivalent Level (CNEL). The acceptable noise level for residential areas are 60 dBA for single family and 65 dBA for multifamily.[20] According to the Master EIR, the distance to the 70 dBA CNEL for Gloria Drive adjacent to Reichmuth Park would be 2 feet from the centerline, which is within the road itself (at buildout of the General Plan). The distance to the 70 dBA CNEL for 43rd Avenue near the park is 4 feet, which also would be within the road. The distance to the 60 dBA would be 23 feet from centerline for Gloria Drive and 38 feet for 43rd Avenue, which indicates that the noise levels at residential uses near the project site would experience acceptable noise levels.[21]

The City of Sacramento noise ordinance states that exterior noise limits in residential 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)]. Tree and park maintenance activities conducted by the City Parks Department are also exempt from the Noise Ordinance standards [Section 8.68.080(H)]. 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.

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.

20. City of Sacramento, *Sacramento 2035 General Plan Master Environmental Impact Report*, August 11, 2014, page 4.8-4, Table 4.8-2.
21. City of Sacramento, *Sacramento 2035 General Plan Master Environmental Impact Report*, August 11, 2014, Table 4.8-4.

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 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:

Policy 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. As discussed in Item 11, the proposed Project could increase traffic slightly, due to additional park users using the disc golf course. Typically, a doubling of a noise source is needed to result in a noticeable change in traffic noise. Gloria Drive is expected to carry approximately 3,900 cars per day. The replacement of existing playground facilities would result in few if any additional vehicle trips to the park. There could be periods when there are additional park users due to the disc golf course, but they would not substantially increase the number of vehicles using Gloria Drive.

There could be noise from park users at the play area and disc golf course, although it would be limited to unamplified vocal noise from children playing and people using the disc golf course. This noise would occur during the day, when ambient noise levels are also higher due to traffic and other park activity. The project site is located approximately 150 feet from the nearest residential uses, and separated by a road so this periodic activity-related noise should not cause

undue disturbances. The proposed Project would not alter park hours. For these reasons, the impact on long-term noise levels would be ***less than significant***, 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. For the play area, construction activities would include removal of existing play ground equipment and the water play area, landscaping material and associated facilities, regarding, cement pouring, connection of water lines, installation of misters, new playground equipment, landscape material, and signs, and resurfacing of two ADA spaces in the parking lot. The disc golf course would require clearing of vegetation, tree removal, grading, concrete pouring, and installation of baskets, pads and signs. 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 of limited duration (less than 4 months). The noise from construction equipment would vary depending on location and the specific activities. Although nearby residences are set back from the project site by at least 150 feet, at various times, residents on Gloria Drive near the project site would be able to hear construction equipment noise. People using the park would also be able to hear equipment noise, particularly near 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. 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
9. PUBLIC SERVICES 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?			X

ENVIRONMENTAL SETTING

The City of Sacramento provides law enforcement services within the City, including the project site. Reichmuth Park is located in the District 4 of the South command area.

The City of Sacramento Fire Department provides fire protection and emergency medical services to the City. The closest fire station is Station 13 at the corner of 43rd Avenue and Gloria Drive. The City has a mutual aid agreement with Metro Fire as well as other fire protection districts in the region.

The project site and surrounding area are in the Sacramento City Unified School District. The schools serving the project site and vicinity are John Cabrillo, Sam Brennan Middle School and John F. Kennedy High School.[22] None of these schools are located in the immediate vicinity of the park.

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.

22. Sacramento City Unified School District, *Elementary/K8 Assignment Areas 2014/2015, Middle School Assignment Areas 2014/2015 and High School Assignment Areas 2014/2015*.

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 ongoing demand for fire protection, law enforcement, schools or other public services. As part of Reichmuth Park, the project site is already served by the City's Police and Fire Departments. The proposed Project would replace an existing play area and add a new facility to the park, the disc golf course. There could be slight increases in park use, but not enough to require police or fire services beyond those identified in the General Plan. Therefore, the proposed Project would impact on public services would be ***less than significant***.

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
10. RECREATION Would the project: A) Cause or accelerate substantial physical deterioration of existing area parks or recreational facilities?			X
B) Create a need for construction or expansion of recreational facilities beyond what was anticipated in the 2035 General Plan?			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.[23]

Reichmuth Park is an approximately 42-acre community park. Active park facilities include a baseball diamond, soccer fields, restrooms, lighted tennis courts, basketball court, skate park, tennis courts, large water feature (no longer functional), tot lot and Adventure Play Area. The park also has a nature area composed of a large, continuous stand of mixed-oak riparian forest surrounding Mungers Lake, a small water body that collects local stormwater drainage and irrigation runoff. Park improvements within the nature area are limited to trails that provide connections to the northern, western and southern portions of the park, and seating areas. A 6- to 10-foot dirt trail runs north-south through the nature 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.

23. 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 replace existing play ground facilities and add a new amenity to the park, a disc golf course. As discussed throughout this Initial Study, the environmental effects of the proposed Project have been addressed in the Master EIR or, in come 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
11. TRANSPORTATION AND CIRCULATION Would the project: 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.			X
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.?			X
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?			X
D) Transit: adversely affect public transit operations or fail to adequately provide for access to public?			X
E) Bicycle facilities: adversely affect bicycle travel, bicycle paths or fail to adequately provide for access by bicycle?			X
F) Pedestrian: adversely affect pedestrian travel, pedestrian paths or fail to adequately provide for access by pedestrians?			X

ENVIRONMENTAL SETTING

Primary vehicular access to Reichmuth Park is provided by Gloria Drive, which borders the park on the west and connects to 43rd Avenue to the north (see Figure 2). The playground area is located close to the Reichmuth Park parking lot that connects to Gloria Drive. The disc golf course area can be accessed either from the parking lot or from parking along Gloria Drive or

Silver Lake Drive to the south. There is no vehicular access to the park from the east.

Gloria Drive is classified as a minor collector in the 2035 General Plan[24]. In the vicinity of the project, it is a 2-lane road with sidewalks, and operates at an acceptable level of service, as do 43rd Avenue and other roads in the vicinity of the park[25]. Gloria Drive is projected to carry 3,900 average daily trips (ADT) and operate at Level of Service A at buildout of the 2035 GP.[26]

There are existing bike lanes on Gloria Road adjacent to the project site, and a bike route on 43rd Avenue and South Land Park Drive.[27] There are sidewalks on both sides of Gloria Drive.

Regional Transit (RT) operates bus service along Gloria Drive, 43rd Avenue and South Land Park Drive, but there are no bus routes on the portions of 43rd Avenue and Gloria Drive adjacent to the project site.

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
- the LOS (without project) is E or F, and project generated traffic increases the peak hour period 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.

24. City of Sacramento, *Sacramento 2035 General Plan Master Environmental Impact Report*, August 2014, Exhibit 4.12-1.
25. City of Sacramento, *Sacramento 2035 General Plan Master Background Report*, August 2014, Figure 3-2.
26. City of Sacramento, *Sacramento 2035 General Plan Master Environmental Impact Report*, August 2014, Exhibit 4.12-3.
27. Bikeway Master Plan Map, updated March 24, 2015, portal.cityofsacramento.org/public works/transportation/programs&services/bikewayprogam, accessed May 17, 2015.

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.

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, equipment and employees would travel to the project site. However, the project is a small-sized improvement project, so the number of trips would be limited, and the duration of construction would be less than 4 months. Further, Mitigation Measure AQ-2 in Item 2, Air Quality, requires that construction traffic be scheduled to avoid peak periods of traffic to the extent possible. The staging area for construction would be in the parking lot, so Gloria

Drive would not be blocked during construction.

After construction, the project would not substantially increase vehicular traffic over existing conditions. Some additional traffic could be generated by the new disc golf course, which could attract a players to the park who would not be there if there were no disc course. It is not anticipated that there would be any large number of people using the course at any one time during the weekday peak hours, because most of the players would arrive during the weekends. The replacement of existing play equipment would not be expected to substantially increase the number of people using the playground area.

Gloria Drive is the primary access to the project site, and is projected to operate at an acceptable level of service under buildout of the General Plan. The small amount of additional traffic generated by the proposed Project would occur primarily in the evenings and on weekends, which are outside of the peak period for traffic. Therefore, the proposed Project would not cause conditions on Gloria Drive or other local roads to drop below acceptable levels.

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

D. Transit

Construction activities would not interfere with transit operations because there are no bus lines or bus stops adjacent to the project site.

The proposed Project would not generate substantial additional transit demand. The play area would not substantially increase park use because existing facilities would be replaced. The disk golf course could generate some additional park usage, and some of project patrons could choose to travel by transit. However, there are no bus stops adjacent to the project site, so transit use would be limited, and would not exceed the ability of RT to provide service. For these reasons, the impact on transit would be ***less than significant.***

E. Bicycle and F. Pedestrian

Construction activities would occur within the park, and the staging area would be in the parking lot, so the Project would not interfere with bike lanes or sidewalks.

Park users could access the project site via existing bike lanes and sidewalks on Gloria Drive, which would be unaffected by project elements. Therefore, 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
12. UTILITIES AND SERVICE SYSTEMS Would the project: A) Result in the determination that adequate capacity is not available to serve the project's demand in addition to existing commitments?			X
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?			X

ENVIRONMENTAL SETTING

The City of Sacramento provides domestic water service to Reichmuth Park and the surrounding area. The City obtains water from the American and Sacramento Rivers and groundwater wells. There are existing City water lines within the park, connecting to the fountain (which no longer operates) and the irrigation system.

Water demand in the City was approximately 113,340 afy in 2010, and is projected to be approximately 261,000 afy at buildout of the General Plan in 2040[28]. The City has adequate water entitlements to meet this demand[29]. Under drought conditions, the City's supply from the American River is restricted, but there would still be adequate supply due to the use of groundwater and slight reductions in demand (4%).[30] However, on peak days, the demand for treated water would exceed the City's production capacity after 2020. [31] Maximum day water demand for the General Plan is project to be approximately 400 million gallons per day (mgd) by 2040.[32] The Master EIR identifies several infrastructure improvements that would result in adequate production capacity, but concluded that the impact was significant and unavoidable, because an option had not yet been selected, and all of the options would have environmental effects that had yet to be fully evaluated.[33]

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 City

28. City of Sacramento, *Sacramento 2035 General Plan Master Environmental Impact Report*, August 2014, page 4.11-3, Table 4.11-1, and page 4.11-6.
29. City of Sacramento, *Sacramento 2035 General Plan Master Environmental Impact Report*, August 2014, page 4.11-3
30. City of Sacramento, *Sacramento 2035 General Plan Master Environmental Impact Report*, August 2014, page 4.11-6.
31. City of Sacramento, *Sacramento 2035 General Plan Master Environmental Impact Report*, August 2014, page 4.11-7, Table 4.11-3.
32. City of Sacramento, *Sacramento 2035 General Plan Master Environmental Impact Report*, August 2014, page 4.11-7, Table 4.11-3.
33. City of Sacramento, *Sacramento 2035 General Plan Master Environmental Impact Report*, August 2014, page 4.11-11.

of Sacramento provides sewer service to the project site. There are sewer lines within Gloria Drive that connect to the restrooms at Reichmuth Park.

Sump 55 is located on 43rd Avenue west of the skate park, and is owned and operated by the City. Sump Station 65 is located adjacent to Silver Lake Drive, and collects stormwater and then pumps it to the South Sacramento Drainage Canal to the south of Silver Lake Drive. The soccer fields and surrounding turf areas function as a detention basin during storm events.

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.[34]

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).

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, 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).

34. City of Sacramento, *Sacramento 2035 General Plan Background Report*, August 2014, page 4-45.

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 use water for the water misters. The existing fountain and water play area would be removed, and the water lines would be extended to the mister area. Water misters would be used during the warmer months. The water misters would use approximately 30 to 40 gallons per minute (gpm). Assuming that the misters were to operate for 8 hours a day, the daily demand would be approximately 19,200 gallons per day (gpd), or 0.005 percent of projected General Plan demand. Assuming that the water misters operate for 4 months a year combined with irrigation of the new turf area[35], total annual water use would be less than 8 acre feet per year (afy), or 0.007 percent of existing demand. This demand is relatively small, and can be accommodated by existing and future City water supplies. The proposed Project is consistent with the land uses assumed in the Master EIR and project demand for treated water would not be great enough to alter the ultimate size of new treatment facilities, or the impacts associated with the new facilities. Therefore, the proposed Project would not substantially increase the severity of the significant and unavoidable impact on water treatment.

No changes would be made to the existing restrooms as part of the proposed Project, so there would be ***no impact*** on wastewater treatment or conveyance.

The proposed Project would drain to the existing storm drainage system, similar to current conditions. There would be a reduction in the amount of impervious surface due to removal of the existing fountain and its replacement with turf, so there would not be an increase in stormwater flows. Therefore, the existing drainage system would be able to accommodate project runoff, and the impact on the drainage system would be ***less than significant***.

The proposed Project would not provide lighting or other facilities that could require a substantial source of electricity. The proposed Project would use only small amounts of electricity for the water mister system. No natural gas would be used. The amount of electricity used for the mister system would be within the electrical demands anticipated by the 2035 General Plan. Therefore, the impact on electrical use would be ***less than significant***.

Demolition of the existing fountain and water play area and removal of play structures and existing landscaping material would result in construction waste that would be disposed of at a landfill. Once constructed, individuals using project facilities would generate small amounts of waste, which would be collected as part of standard park maintenance. As stated above, the Kiefer landfill has enough capacity to accommodate its service area (including the City of Sacramento General Plan area) until 2065. The amount of waste generated by park users would not be enough to alter the landfill's lifespan. For these reasons, impacts on solid waste collection and disposal would be ***less than significant***.

35. Assumes 4 acre-feet/year of water for irrigation of 2,400 square feet of new turf and misters operating for 8 hours per day for 4 months @ 40 gallons per minute.

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
13. MANDATORY FINDINGS OF SIGNIFICANCE 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 that are considered historically significant, but the site has moderate to high 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, 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, would protect residents from air emissions and noise. For these reasons, this is an impact that is ***less than significant with mitigation incorporated***.

SECTION IV - ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

X	Aesthetics	X	Hazards
X	Air Quality	X	Noise
X	Biological Resources	X	Public Services
X	Cultural Resources	X	Recreation
	Energy and Mineral Resources	X	Transportation/Circulation
X	Geology and Soils	X	Utilities and Service Systems
X	Hydrology and Water Quality		
	None Identified		

SECTION V - DETERMINATION

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))

___ 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))

D Mahaffey
Signature

8/27/15
Date

DANA MAHAFFEY
Printed Name

REFERENCES CITED

Abacus Consulting Arborists, *Consulting Arborist Report prepared at the request of the City of Sacramento for the Reichmuth Park Nature* Area, February 25, 2015.

Abacus Consulting Arborists, *Consulting Arborist Report prepared at the request of the City of Sacramento for the Reichmuth Park Playground*, February 24, 2015.

Bumgardner Biological Consulting, *Reichmuth Park Phase 2 Improvements, Biological Resources Evaluation, Sacramento, California,* January 2015.

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

California Department of Conservation, Regional Geological Hazards and Mapping Program, www.conservation.ca.gov/CGS/Regional Geological Hazards and Mapping Program/AP, accessed May 21, 2015.

California Department of Toxic Substances, *Envirostar Database*, accessed June 4, 2015.

California Department of Toxic Substances, *Geotracker*, accessed June 23, 2015.

City of Sacramento, Bikeway Master Plan Map, updated March 24, 2015, portal.cityofsacramento.org/publicworks/transportation/programs&services/bikewayprogam, accessed May 17, 2015.

City of Sacramento, *Sacramento 2035 General Plan*, March 2015.

City of Sacramento, *Sacramento 2035 General Plan Draft Background Report*, August 2014.

City of Sacramento, *Sacramento 2035 General Plan Draft Master Environmental Impact Report*, August 2014.

City of Sacramento, *Sacramento Entertainment and Sports Center & Related Development Draft Environmental Impact Report*, December 2013.

City of Sacramento, Parks and Recreation, Landscape Architecture Division, Construction Plans for Reichmuth Park Phase 2 Improvements, 75 percent, May 2015.

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

Deering, Roberta, Preservation Director, City of Sacramento, electronic communication to Dana Mahaffey, City of Sacramento Associate Planner, June 4, 2015.

Federal Emergency Management Agency, *Flood Insurance Rate Map (FIRM), Sacramento County, California, and Incorporated Areas, Panel 170 of 705*, *Map Number 06067C0170H,* August 16, 2012.

Natural Resources Conservation Service, *Custom Soil Resource Report for Sacramento County, California, Reichmuth Park,* June 12, 2015.

North Central Information Center, *Records Search Results for Reichmuth Park Phase 2 Improvements,* NCIC File No.: SAC-15-75b, May 1, 2015.

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

Sacramento City Unified School District, Elementary/K8 Assignment Areas 2014/2015, Middle School Assignment Areas 2014/2015 and High School Assignment Areas 2014/2015.

Appendix A
Climate Action Plan Checklist

City of SACRAMENTO
Community Development

300 Richards Blvd., 3rd Floor
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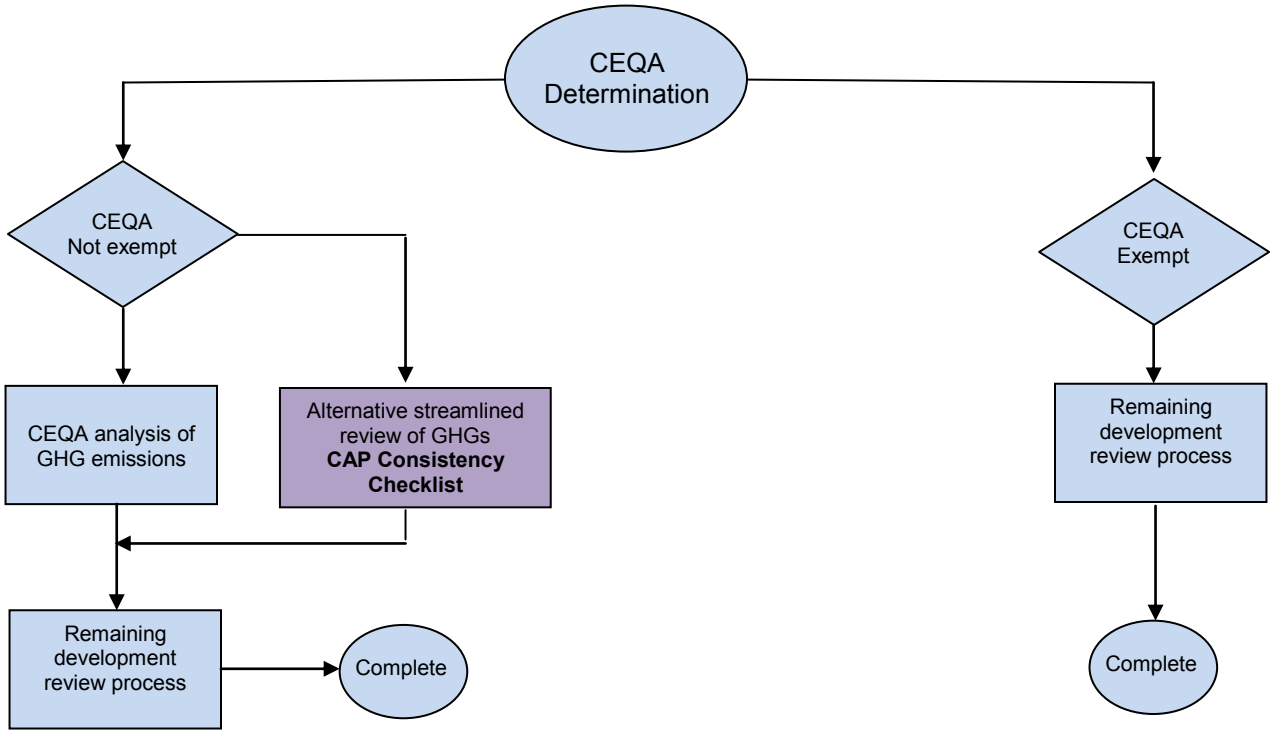
CLIMATE ACTION PLAN – CONSISTENCY REVIEW CHECKLIST

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



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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: L19153101

Address of Property: 6135 Gloria Drive, Sacramento

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

Consultant Name*: _____

Company: _____

Phone: _____ E-Mail: _____

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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?		X

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)

The proposed Project is consistent with the General Plan land use designation of Parks and Recreation. No changes in density, FAR, land use or urban form are proposed.

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?	Yes	No*	NA
			X

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.

The proposed Project does not include any residential, commercial or other land uses that generate substantial vehicle trips. The Project would generate only minimal vehicular traffic, if any. The proposed Project would not increase parking capacity at the park. The replacement of existing playground equipment would not generate new trips. The new disk golf course could result in small increases in traffic, particularly on weekends.

(Attach a copy of the VMT model input 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.

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Checklist Item (Check the appropriate box, and provide explanation for your answer).	Yes	NA
3. Would the project incorporate traffic calming measures? *(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.)*		X

Please explain how the proposed project meets this requirement (list traffic calming measures). If "not applicable", explain why traffic calming measures were not required.

The proposed Project would not generate substantial vehicular traffic, because it would replace existing playground equipment, and would not increase parking. The only increase in traffic would be associated with the disk golf course. The proposed Project would not affect or improve existing streets.

4. Would the project incorporate pedestrian facilities and connections to public transportation consistent with the City's Pedestrian Master Plan?	Yes	NA
	X	

Please explain how the proposed project meets this requirement. If "not applicable", explain why this was not required.

The project site is not identified in the City's Pedestrian Master Plan. However, the proposed Project would is located in Reichmuth Park, which is served by sidewalks and pedestrian paths.

*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.

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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
		X

Please explain how the proposed project meets this requirement. If "not applicable", explain why this was not required.

The Bicycle Master Plan does not identify bike facilities within the project site. No change in land use is proposed, and no residential, commercial or other employment-generating uses would be developed as part of the project, so no bicycle facilities are 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
			X

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.

The proposed Project is not a residential or commercial project.

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
		X

Please explain how the proposed project meets this requirement. If "not applicable", explain why this was not required.

The proposed Project does not include any structures, so CALGreen does not apply.

*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.

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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: 24 AUG 15

Appendix B
Special-Status Species Table

APPENDIX B
TABLE 1
SPECIAL-STATUS SPECIES RECORDED OR POTENTIALLY OCCURRING WITHIN THE REICHMUTH PARK PHASE 2 IMPROVEMENT PROJECT SITE

Genus/Species	Common Name	Status Federal/CA/Other	Habitats and Seasonal Distribution in California	Likelihood of Occurrence in Project Area
PLANTS				
Juglans hindsii	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 *J. regia* 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.
BIRDS				
Accipiter cooperii	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.

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Buteo swainsoni	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. In addition, multiple nests have been documented within five miles or less of the project site. Though the potential nesting habitat is isolated from the nearest foraging habitat by at least 1.5 miles, the species has been found nesting in similar situations elsewhere (e.g., downtown Davis). Therefore, the species is considered to have some potential, albeit low, to nest within the project site.
Picoides nuttallii	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 ReichmuthPark in the eBird data base. Therefore, the species is known to occur within or immediately adjacent to the project site.

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Baeolophus inornatus	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 Reichmuth Park in the eBird data base. Therefore, the species is known to occur within or immediately adjacent to the project site.

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Melospiza melodia mailliardi	Song sparrow ("Modesto" population)	none/CSC/none	This subspecies is endemic to California, residing only in the north central portion of the Central Valley from Colusa County in the Sacramento Valley south through the Delta (exclusive of Suisun Marsh) to the northern San Joaquin Valley of Stanislaus County. The ecological requirements of the subspecies are largely undescribed, but it has an affinity for emergent freshwater marshes dominated by tules and cattails as well as riparian willow thickets. It has also been found nesting in riparian forests of valley oak with a sufficient understory of blackberry, along vegetated irrigation canals and levees, and in recently planted valley oak restoration sites.	Low Potential. There is suitable habitat for this subspecies (i.e., dense understory of Himalayan blackberry within mixed oak-riparian woodland) within and immediately adjacent to the project site. Therefore, the subspecies is considered to have some potential, albeit low, to occur within the project site.

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MAMMALS				
Lasiurus cinereus	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.
Lasiurus blossevillii	Western red bat	none/CSC/none	The species occurs at scattered locations throughout the lowland portions of California west of the Sierra Nevada crest and desert regions (typically in riparian forest or orchards). It is less abundant at low and middle elevations in coniferous forest. Roosting sites are found in tree or shrub foliage between 2 and 40 feet above ground (typically in large cottonwoods, sycamores, walnuts, and willows).	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.

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SPECIAL-STATUS SPECIES RECORDED OR POTENTIALLY OCCURRING WITHIN THE REICHMUTH PARK PHASE 2 IMPROVEMENT PROJECT SITE

Genus/Species	Common Name	Status Federal/CA/Other	Habitats and Seasonal Distribution in California	Likelihood of Occurrence in Project Area
FEDERAL				
		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)	
STATE				
		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”	
OTHER				
		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)	

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Genus/Species	Common Name	Status Federal/CA/Other	Habitats and Seasonal Distribution in California	Likelihood of Occurrence in Project Area

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

RESPONSES TO COMMENTS

This Response to Comments document contains comments received during the public review period of the Reichmuth Park Phase 2 Improvement Project (proposed Project) Initial Study/Mitigated Negative Declaration (IS/MND). The proposed Project would update and replace several of the existing park facilities, including play equipment and a water mister area, and create a new disc golf course.

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 September 1, 2015, and ending on October 1, 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

The City of Sacramento received one comment letter on the IS/MND for the proposed Project during the public comment period. An additional letter was received after the comment period. The comment letters were authored by the following agencies:

Letter 1	Central Valley Regional Water Quality Control Board
Letter 2	United Auburn Indian Community of the Auburn Rancheria

RESPONSE TO COMMENTS

The Response to Comments section includes responses to the comment letters submitted regarding the proposed Project. The comment letters have 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 has the following format: 1-1. No revisions to the IS/MND were made in response to comments received.

California Water Boards

Edmund G. Brown Jr.
Governor

Matthew Rodriquez
Secretary for Environmental Protection

Central Valley Regional Water Quality Control Board

22 September 2015

Dana Mahaffey
City of Sacramento
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811

CERTIFIED MAIL
91 7199 9991 7035 8420 5457

COMMENTS TO REQUEST FOR REVIEW FOR THE MITIGATED NEGATIVE DECLARATION, REICHMUTH PARK PHASE 2 IMPROVEMENT PROJECT, SCH# 2015082066, SACRAMENTO COUNTY

Pursuant to the State Clearinghouse's 31 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 Reichmuth Park Phase 2 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. 1-1

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 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/.

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

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.

1-1 (cont.)

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

1-2

(SWPPP).

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.

1-2 (cont.)

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits[1]

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.

1-3

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/.

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

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.

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

[1] 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.

drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements.

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.

1-4 (cont.)

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.

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; or contact water board staff at (916) 464-4611 or via email at 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 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.

1-4 (cont.)

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

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

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

Trevor Cleak
Environmental Scientist

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

LETTER 1: CENTRAL VALLEY REGIONAL WATER QUALITY CONTROL BOARD

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 47 of the IS/MND, the proposed Project would disturb less than one acre 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,

Letter 2

MIWOK MAIDU United Auburn Indian Community of the Auburn Rancheria

Gene Whitehouse, Chairman | John L. Williams, Vice Chairman | Danny Rey, Secretary | Brenda Adams, Treasurer | Calvin Moman, Council Member

October 22, 2015

Dana Mahaffey
City of Sacramento
300 Richards Blvd. 3rd Floor
Sacramento, CA 95811

Subject: Notice of Availability / Intent - Reichmuth Park Phase 2 Improvement Project (#L19153101)

Dear Dana Mahaffey,

Thank you for requesting information regarding the above referenced project. The United Auburn Indian Community (UAIC) of the Auburn Rancheria is comprised of Miwok and Southern Maidu (Nisenan) people whose tribal lands are within Placer County and whose service area includes El Dorado, Nevada, Placer, Sacramento, Sutter, and Yuba counties. The UAIC is concerned about development within its aboriginal territory that has potential to impact the lifeways, cultural sites, and landscapes that may be of sacred or ceremonial significance. We appreciate the opportunity to comment on this and other projects in your jurisdiction. 2-1

In order to ascertain whether the project could affect cultural resources that may be of importance to the UAIC, we would like to receive copies of any archaeological reports that are completed for the project. We also request copies of future environmental documents for the proposed project so that we have the opportunity to comment on potential impacts and proposed mitigation measures related to cultural resources. And, we would like the opportunity to have our tribal monitors accompany you during the field survey. The information gathered will provide us with a better understanding of the project and cultural resources on site and is invaluable for consultation purposes. 2-2

The UAIC's preservation committee would like to set up a meeting and begin consulting on the proposed project. Thank you again for taking these matters into consideration, and for involving the UAIC early in the planning process. We look forward to reviewing the documents requested above and consulting on your project. Please contact Marcos Guerrero, Cultural Resources Manager, at (530) 883-2364 or by email at mguerrero@auburnrancheria.com if you have any questions. 2-3

Sincerely,

Gene Whitehouse,
Chairman

CC: Marcos Guerrero, CRM

Letter 2: United Auburn Indian Community of the Auburn Rancheria

Note that the public review period for this MND was from September 1st to September 30th, 2015. The UAIC comment letter is dated October 22, 2015, and was received after the close of the comment period. Nonetheless, responses are provided to the comments, below.

Response to Comment 2-1

The comment provides information about UAIC. No response is warranted.

Response to Comment 2-2

As requested, the UAIC has been provided the environmental document (the IS/MND) for the proposed Project, which describes the potential impacts on cultural resources and provides mitigation, as discussed below.

The Mitigated Negative Declaration for the Reichmuth Park Improvement Project includes the following mitigation measure:

> Mitigation Measure CUL-1
>
> 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).

As discussed on page 37 of the IS/MND, even though this is a sensitive area based on the records of NCIC and CHRIS, the scope of the project does not require a preconstruction archaeological survey as requested in the comment. The vegetation removal will not involve excavation below the surface area within the nature area where the disc golf baskets are to be located, so no special measures are needed for that task. Only four of the nine disc golf basket brackets will be installed within the previously undisturbed nature area, and excavation for the brackets is only a 1 foot wide and 2 foot deep hole. Therefore, it is highly unlikely that such a shallow and limited excavation using hand tools and not heavy equipment will disturb any buried artifacts. That is why the Mitigated Negative Declaration study concluded that: "Because most of the project area has been disturbed in the past, and the amount of subsurface disturbance that would result from the project would be minimal, the City has determined that a cultural resource study is not warranted for the proposed Project."

As required by Mitigation Measure CUL-1, if artifacts are uncovered, work would be

stopped. At that time the City would notify the Tribe if the artifacts are determined to be Native American to address where and how the artifacts are to be reburied in accordance with the stated codes identified above and the mitigation measure. The City would then hire a licensed archaeologist to monitor the remaining excavation work.

Response to Comment 2-3

As requested, City staff met with a UAIC representative on January 12, 2016, at the project site to consult on the proposed Project. The City appreciates the Tribe's comments and suggestions, but for the reasons set forth above, the mitigation measure as set forth in the IS/MND would adequately protect cultural resources, if any are present in the project site.