

**ADDENDUM TO AN ADOPTED MITIGATED NEGATIVE DECLARATION**

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

The proposed Natomas Crossing Apartments (P17-062) project is a request to make changes to the previously-approved Natomas Crossing Alleghany Area #2 PUD project (P96-083) and subsequent Plaza project (P06-070) (collectively the “prior project”) and to construct a 293-unit multi-family apartment complex on a 10.3-acre site in Natomas Crossing Alleghany Area #2 Planned Unit Development (PUD) in the North Natomas Community Plan area. The project is consistent with the previously-approved prior project site’s existing land use designation and zoning. The proposal requires a Conditional Use Permit to allow for multi-family residential within the SC-PUD zone) and Site Plan and Development Plan Review.

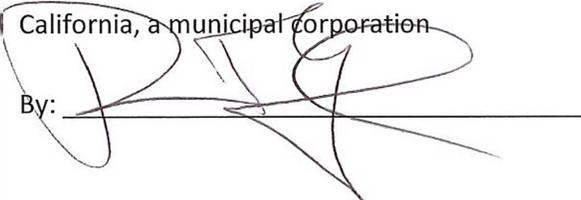
The City of Sacramento, Community Development Department, has reviewed the proposed changes to the previously-approved prior project and on the basis of the whole record before it, has determined that there is substantial evidence to support the determination that the attached previous Mitigated Negative Declaration (MND) and subsequent Addendum to the MND (collectively the “MND”) remain relevant in considering the environmental impacts of the project changes and that there is no substantial evidence to support a fair argument that the changes to the project, as identified in the attached Addendum, may have a significant effect on the environment beyond that which was evaluated in the attached MND. A Subsequent Environmental Impact Report (EIR) or MND is not required pursuant to the California Environmental Quality Act of 1970 (Sections 21000, et. seq., Public Resources Code of the State of California).

This Addendum to the MND has been prepared pursuant to Title 14, Section 15164 of the California Code of Regulations; the Sacramento Local Environmental Regulations (Resolution 91-892) adopted by the City of Sacramento.

A copy of this document and all supportive documentation may be reviewed or obtained at the City of Sacramento, Community Development Department, Planning Division, 300 Richards Boulevard, Sacramento, California 95811.

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

Date: 2/9/2018

By: 

## **Natomas Crossing Apartments (P17-062) Addendum to Mitigated Negative Declaration**

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The following information is provided as a minor revision in the language of the Initial Study/Mitigated Negative Declaration for the Natomas Crossing Alleghany Area #2 PUD (P96-083) and the subsequent Addendum to the MND for the Plaza project (P06-070) (collectively the "MND"). All responses to the City's CEQA Guidelines checklist questions, project impact analysis, and mitigation measures contained in the MND remain the same unless modified or replaced by the Addendum information provided below.

### **PROJECT INFORMATION**

**Project Name/File Number:** Natomas Crossing Apartments (P17-062)

**Project Location:** 3949 Truxel Road (APNs 225-1250-002 and 225-1250-049), southeast of the intersection of Arena Boulevard and Innovator Drive.

**Existing Plan Designations and Zoning:** The project site's General Plan Designation is Community Neighborhood Commercial and Offices. The project site is zoned Shopping Center Planned Unit Development (SC-PUD).

**Other Project Studies/Reports/References:** All documents are available at the City of Sacramento, Community Development Department, 300 Richards Boulevard, Sacramento, CA 95811.

- Natomas Crossing Alleghany Area #2 PUD (P96-083) Mitigated Negative Declaration (attached)
- The Plaza (P06-070) Addendum to Mitigated Negative Declaration (attached)
- City of Sacramento 2035 General Plan Update Master EIR

**Project Background:** On June 24, 1997, the City of Sacramento (the "City") adopted a Mitigated Negative Declaration for the Natomas Crossing Alleghany Area #2 PUD project. The Natomas Crossing Alleghany Area #2 PUD project MND evaluated several entitlements to allow development of a portion of one neighborhood in the North Natomas community, on approximately 210.8 acres, located at the southwest corner of North Market Boulevard and the Natomas East Main Drainage Canal. Specific entitlements included:

- A. *Development Agreement* between City and Alleghany Properties, Inc.
- B. *General Plan Amendment*.

- C. *1994 North Natomas Community Plan Amendment.*
- D. *Rezone of 210.75+ gross acres.*
- E. *Designation of a PUD and Establishment of PUD Guidelines and Schematic Plan for Natomas Crossing PUD - a portion of Neighborhood #4 of the North Natomas Community Plan consisting of 210.75 acres.*
- F. *Tentative Master Parcel Map for Alleghany Area #2 to subdivide 5 parcels totaling 210.75+ gross acres into 36 master parcels*
- G. *Tentative Map for Phase I - Natomas Crossing to subdivide 22 proposed master parcels.*
- H. *Subdivision Modification to allow private streets within a proposed gated community.*
- I. *Subdivision Modification to allow alleys within the Natomas Crossing subdivision.*

In 2006, the City approved The Plaza (P06-070) project in the Natomas Crossing Alleghany Area #2 PUD, which authorized a series of specific entitlements for a 17.5 acre project site located south of Arena Boulevard, west of Truxel Road and east of Innovator Drive. Entitlements included a rezone to relocate 10.7 acres of SC-PUD and 6.8 acres of Limited Commercial PUC zoning; a tentative map to subdivide two parcels into 8 parcels on 17.5 net acres in the SC-PUD and C-1-PUD zones; schematic plan amendment to develop 43,000 square feet of commercial development and devote 10.7 acres to future medium density residential development permitting up to 310 residential units; and plan review to develop approximately 43,000 square feet of commercial space in the C-1-PUD zone. The approval of the Plaza project resulted in the establishment of SC-PUD zoning on 10.7 acres adjacent to Innovator Drive south of Truxel Road and identification of this site for future medium density residential development.

**Project Purpose:** The purpose of the proposed project is to obtain necessary entitlements to develop a multi-family apartment complex consistent with the General Plan, the North Natomas Community Plan, and the Natomas Crossing PUD Guidelines on 10.3 acres of the 10.7-acre residential site, previously analyzed.

**Project Description:** The proposed project is a request by the project applicant to change the previously-approved prior project to construct a 293-unit multi-family apartment complex on a 10.3 acre portion of the 10.7 acre site within Area #2 of the Natomas Crossing PUD that was rezoned SC-PUD and set aside for medium density residential development with the approval of the Plaza project in 2006. The specific entitlements necessary to facilitate the requested changes to the previously-approved prior project include:

- A. Conditional Use Permit (to allow for multi-family residential within the SC-PUD zone);
- B. Site Plan and Development Plan Review.

### **Project Location**

The project site is located at 3949 Truxel Road, approximately 4 miles north of downtown Sacramento, near the northern limits of the City of Sacramento in the Natomas Basin region (see Figure 1, Regional Location). The irregularly shaped project site is approximately 10.3 acres and located to the southeast of the intersection of Arena Boulevard and Innovator Drive (see Figure 2, Project Location). It is bound by Arena Boulevard to the north, Truxel Road to the east, Prosper Road to the south, and Innovator Drive to the west.

Interstate 5 and 80 provide regional access to the project site. The Sacramento Regional Transit District (RT) has three bus lines that stop in the vicinity of the project site. The closest bus stops are at the intersection of Truxel Road and Arena Boulevard, where bus lines 11 and 13 provide service. The nearest bus stop for bus line 170 is located on Truxel Road approximately 0.6 miles south of the project site. Class II bike routes are located along Arena Boulevard and Truxel Road near the project site.

### **Existing Conditions**

The project site is currently vacant, undeveloped, and is disked on a regular basis. The generally flat site is characterized as ruderal. There are no trees or any water bodies on the project site. The entire project site has the General Plan land use designation of Community Neighborhood Commercial and Offices and is zoned as Shopping Center Planned Unit Development (SC-PUD).

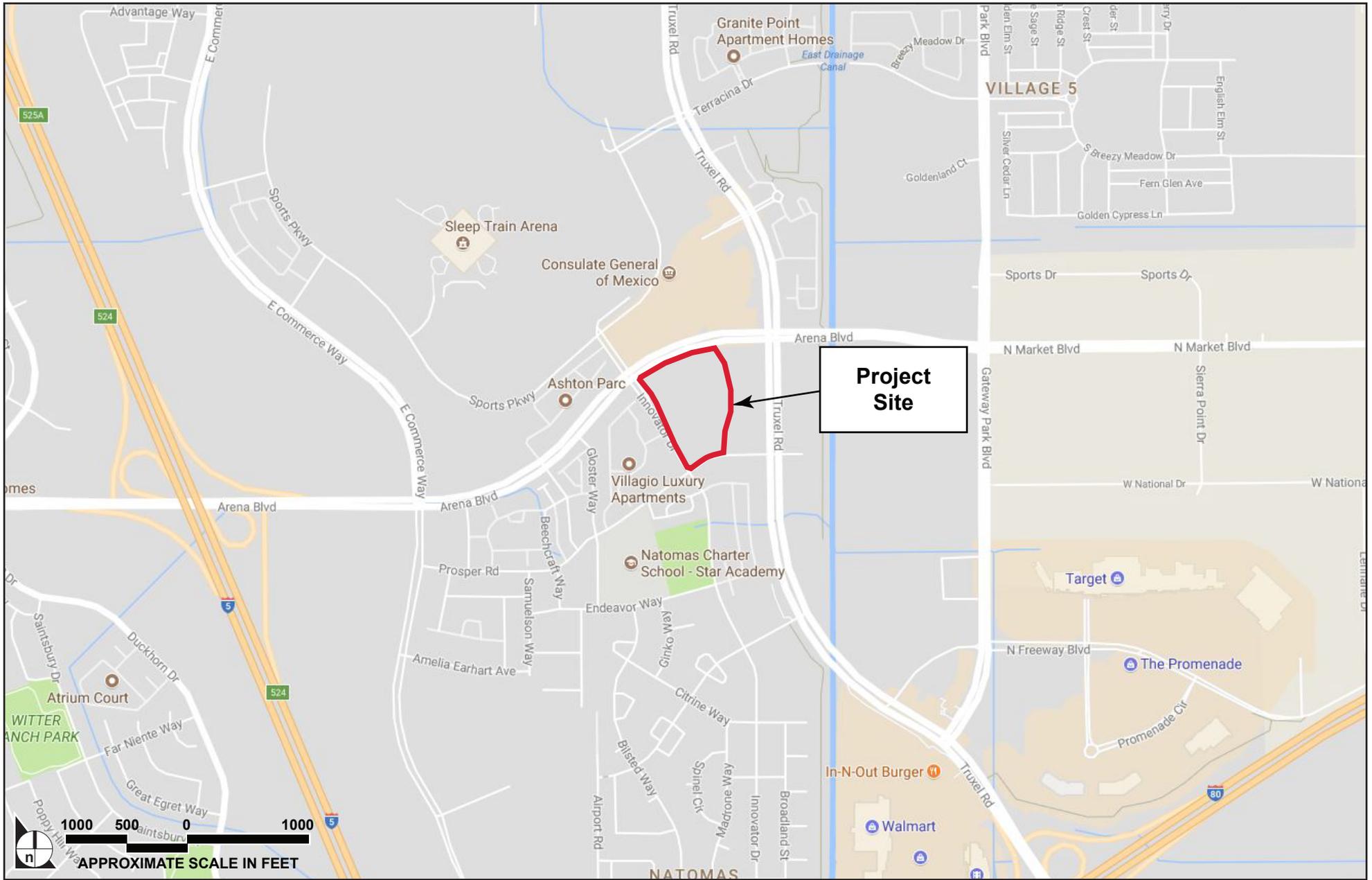
### **Surrounding Land Uses**

The neighborhood near the project site is characterized by residential and commercial uses. The Villagio Apartments are located to the west, the existing Natomas Crossings Apartments to the south, commercial and office buildings to the north, and a vacant lot planned for commercial development (The Plaza Project [P06-070]) adjacent to the eastern boundary of the project site.

### **Project Features and Operations**

The proposed project would construct a 293 unit multi-family apartment complex, as shown on Figure 3, Proposed Site Plan, which will be less than the 310 residential units previously-approved under the MND. The units would be distributed among five buildings, each building four stories high. Four of the five buildings would contain 60 units each while the fifth building would contain 53 units.





SOURCE: Impact Sciences, Inc., 2017

FIGURE 2

Project Location



Sizing of the units would range between approximately 571 square feet and 1,416 square feet. The buildings would exhibit craftsman style architecture, which utilizes warm colors and the use of abundant wood and stone materials. The proposed project would include approximately 394,556 gross square feet of residential building space and 28,844 square feet of landscaping.

### **Amenities and Landscaping**

The proposed project would include approximately 28,844 square feet of outdoor amenity and open space areas.<sup>1</sup> As shown in Figure 3, the proposed project includes an approximately 8,700 square foot clubhouse that is comprised of a vast array of high end outdoor amenities such as an outdoor kitchen, television and fire place lounges, a pool, a spa, sun bathing lounge areas, and cabanas, among other features. In addition, several smaller outdoor amenity areas are proposed around the project site that would include community gardens, grass areas for activities, picnic areas with barbeques, a hammock garden, a tot-lot, and an enclosed dog run area. A variety of trees and shrubs are proposed around the perimeter of the project site, outdoor amenity areas, and open space areas to provide shade. Trees are also planned nearby uncovered parking areas to provide shade per the City's shade tree requirement.

### **Access**

Vehicular and pedestrian access would be provided via two full access driveways. One point of access is proposed along Innovator Drive on the west side of the project site, and a second point of access is proposed along the future private road on the east side of the project site that would be accessed via Prosper Road.

### **Parking**

The proposed project would meet all applicable parking requirements. The proposed project would include a total of 554 parking spaces. Each of the buildings would include covered garage parking and a series of carports would be dispersed throughout the project site, in addition to tree-shaded parking areas.

The project proposes a total of 149 long-term bicycle parking spaces, as well as 28 short-term bicycle parking spaces, both of which are in excess of the numbers required by the City Code applicable to the project.

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<sup>1</sup> This square footage does not include indoor amenity space such as the clubhouse building.

## **Utilities**

**Water:** The City of Sacramento would provide water service to the project. An existing 12-inch water pipeline runs under the future private road along the eastern property line and continues under Prosper Road and Innovator Drive. The 12-inch pipeline running under the two roadways and future private road connects to a 10-inch water pipeline under Arena Boulevard. New water pipelines would be constructed throughout the project site and would connect to the existing water main located within Prosper Road.

**Wastewater:** The Sacramento Area Sewer District (SASD) would provide sanitary sewer service to the project site. There is an existing 8-inch sanitary sewer line under the future private road along the eastern property line that moves northerly and connects to an existing 8-inch sanitary sewer line in Arena Boulevard. There is another existing 8-inch sanitary sewer line under the future private road along the eastern property line that moves southerly and connects to an existing 8-inch sanitary sewer line in Prosper Road. Proposed 6 to 8-inch sanitary sewer lines from Buildings 1, 3, 4, 5, 6 and the Clubhouse would connect to existing sanitary sewer lines in Arena Boulevard or Prosper Road. Proposed 6-inch sanitary sewer line from Building 2 would connect to existing sanitary sewer lines in the future private road.

**Stormwater:** The project site is currently served by the City of Sacramento for storm drainage. Existing 18-inch storm drains are located in Innovator Drive and the future private road. A storm drain system is proposed for the project site that would connect to the existing storm drains within Innovator Drive and the future private road. All roof drains would be tight-lined to the storm drain system.

**Solid Waste:** Solid waste from the proposed project would be disposed of at the Sacramento County Kiefer Landfill. The landfill is permitted to accept up to 10,815 tons of solid wastes per day, averaging 6,300 tons per day.

**Electric and Natural Gas:** The project site would be served by Sacramento Municipal Utility District (SMUD) for purposes of electricity and Pacific Gas and Electric (PG&E) for natural gas.

## **Best Management Practices**

### *Air Quality*

During construction, the proposed project would be required to adhere to the Sacramento Metropolitan Air Quality Management District (SMAQMD) Basic Construction Emission Control Practices (Best Management Practices) listed below:

- 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.
- All roadways, driveways, sidewalks, and parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.

The project would also comply with California regulations which 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 conduct 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.

### ***Biological Resources***

The project is located within the boundaries of the May, 2003 revised Natomas Basin Habitat Conservation Plan (NBHCP) that was approved by the City of Sacramento, USFWS, and CDFW. The project has implemented the NBHCP by previously grading the property and by paying the required habitat mitigation fees. The project would be further implemented in compliance with all provisions of the NBHCP.

## **Project Construction**

Project construction is expected to last approximately 18 months beginning in summer 2018 and continuing through early 2020. Construction staging would take place on the project site. The proposed project would not result in any road closures or off-site improvements.

## **CEQA ANALYSIS**

In the case of a project proposal requiring discretionary approval by the City concerning changes to a project for which the City has previously adopted an MND for the overall project, as here, the City must determine whether, in light of the proposed changes to the project, the environmental analysis in the previously adopted MND remains relevant because it retains some informational value and, if so, whether a subsequent EIR or MND is required, which would be the case if substantial evidence supports a fair argument that the changes to the project may result in a significant environmental impact that was not originally considered when the project was previously approved. As described above, the proposed changes to the previously-approved prior project will remain within the same original footprint and will retain many of the original features, but with fewer residential units, rendering the previously adopted MND highly relevant to the environmental analysis of the changes to the project now proposed.

*CEQA Guidelines* Section 15164(b) states that an addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.

*CEQA Guidelines* Section 15162(a) provides guidance in this matter and states that when “an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
  
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.”

*CEQA Guidelines* Section 15164(d) provides that the decision-making body shall consider the addendum in conjunction with the adopted negative declaration prior to making a decision on the project.

The purpose of this Addendum is to analyze whether the impacts which may result from the proposed Natomas Crossing Apartments (P17-062) project are within the scope of the impacts of the MND.

Based on the analysis in this Addendum, the City has determined that the proposed project would not result in any new significant adverse impacts, nor an increase in the severity of significant adverse impacts previously identified in the MND. The project would not require the adoption of any new or considerably different mitigation measures or alternatives. Lastly, although there have been some changes in the circumstances since the MND was approved, the changes are considered minor technical changes and the analysis in this Addendum demonstrates that there would be no new or more severe impacts due to these changes than previously evaluated and disclosed in the MND. Therefore, this Addendum is the appropriate form of environmental review required under CEQA. This Addendum has been prepared to satisfy the requirements of *CEQA Guidelines* Sections 15164 and 15162.

## **ENVIRONMENTAL IMPACTS OF THE PROPOSED PROJECT**

As noted earlier, the MND evaluated the potential environmental impacts of the 210-acre Natomas Crossing Alleghany Area #2 PUD project, which includes the subsequent approvals for up to 310

residential units on a 10.7 acre site provided for by the Plaza project. Under *CEQA Guidelines* Section 15162, this Addendum provides an analysis of several environmental issues identified in the MND to determine whether, in the context of the proposed changes to the previously-approved project, there is substantial evidence to support the determination that the MND remains relevant in considering the environmental impacts of the project changes and that there is no substantial evidence to support a fair argument that the changes to the project, as identified in this Addendum, may have a significant effect on the environment beyond that which was evaluated in the MND. As mentioned above, *CEQA Guidelines* Section 15164(b) states that the lead agency shall prepare an addendum to an adopted negative declaration if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for preparation of a subsequent negative declaration or EIR have occurred.

## **Aesthetics**

At the time of approval of the Natomas Crossing Alleghany Area #2 PUD, no specific uses or building footprints were identified on the Natomas Crossing Schematic Plan. As no buildings were identified at that time, the MND concluded that before any building other than single family residential can be approved, a Special Permit must be obtained. During the review of the Special Permit request, the potential for glare from the proposed building and lighting features would be analyzed. Therefore, the MND concluded that there would be a less than significant impact to light and glare.

The proposed project site is currently vacant, undeveloped and located in an urbanized area. There are no scenic vistas from the project site or in the project vicinity. Additionally, the proposed buildings would comply with all height, area, and setback requirements of the PUD Guidelines. Therefore, implementation of the proposed project would not adversely affect the scenic views in the area.

There is no state designated scenic route in the immediate vicinity of the proposed project. Therefore, the project impact to scenic resources would be less than significant.

The neighborhood near the project site is characterized by residential and commercial uses. The proposed project would consist of 293 apartment units located in five four-story buildings. The buildings would exhibit craftsman style architecture, which utilizes warm colors and the use of abundant wood and stone materials. Additionally, a variety of trees and shrubs are proposed around the perimeter of the project site, outdoor amenity areas, and open space areas to provide vertical relief, interest at the pedestrian level, and shade. Trees are also planned nearby uncovered parking areas to provide shade per the City's shade tree calculation. Therefore, the impact of the proposed project on the visual character of the project site and its surroundings would be less than significant.

Per the City of Sacramento's City Code, Chapter 8.68, construction work for the proposed project would be completed during daytime hours and no lighting would be required. Operation of the proposed project would add light and glare to the project site but this would be consistent with the surrounding urban area. Furthermore, a variety of trees and shrubs are proposed around the perimeter of the project site and nearby uncovered parking areas to provide shade. Therefore, there would be a less than significant impact from light and glare.

In summary, the proposed project would not result in any new or more severe aesthetic impacts.

## **Air Quality**

The MND concluded that the Natomas Crossing Alleghany Area #2 PUD project would have a significant impact on existing air quality as a result of increased automobile emissions. The MND stated that to reduce this impact, the Natomas Crossing Alleghany Area #2 PUD project would be required to implement a Transportation Systems Management (TSM) strategy. The TSM would result in a minimum 35 percent decrease in peak hour vehicle trips compared to the single occupant vehicle baseline. The MND stated that an Air Quality Mitigation Strategy would be required for the substantial lessening of all significant and potentially significant air impacts resulting from the development of the North Natomas Community Plan area, and would result in a minimum 35 percent community-wide (20 percent for residential and 50 percent for non-residential) decrease in Reactive Organic Gas (ROG) emissions when measured against the baseline conditions and promote electric, other zero-emission, and low-emission vehicle use. Additionally, the MND found that construction management practices related to reducing PM10 emissions would reduce the impacts of PM10 emissions to a less than significant level. The MND concluded that the decreases in trips and emissions would reduce the Natomas Crossing Alleghany Area #2 PUD project's contribution to project specific and cumulative air quality impacts to a less than significant level.

Although the proposed project is consistent with the land use designation and zoning of the project site and therefore within the scope of the prior analysis, the project's construction and operational emissions were estimated and compared to thresholds set forth by the Sacramento Metropolitan Air Quality Management District (SMAQMD) in its *Guide to Air Quality Assessment in Sacramento County* (last revised September 2016).

### *Construction Phase Impacts*

As noted in the Project Description, the proposed project would apply SMAQMD Basic Construction Emissions Control Practices. These practices are consistent with practices listed under Mitigation Measure #2 in the MND, but update the control practices to current standards. Construction-related

emissions for the proposed project were estimated using the SMAQMD approved CalEEMod 2016.3.2 model. With the application of the SMAQMD Basic Construction Emission Control Practices which are included in the project, daily construction emissions of criteria pollutants, fugitive dust and diesel particulate emissions would be below the significance thresholds. Similar to the conclusion of the MND, the project's air quality impact during construction would be less than significant.

#### *Operational Impacts*

The project will produce long-term air quality impacts to the region primarily from motor vehicles that access the project site. Operational emissions were estimated using the SMAQMD approved CalEEMod 2016.3.2 model and the trip generation estimate provided in the project's traffic study. Estimated daily operational emissions would not exceed SMAQMD's significance thresholds for ROG, NO<sub>x</sub>, CO, PM<sub>10</sub> and PM<sub>2.5</sub> emissions. As a result, the project's operational impacts on regional air quality are considered less than significant and implementation of a TSM plan would not be required.

#### *Hotspots*

Long-term operations of the project would not result in exceedances of CO air quality standards at roadways in the area. This is due to three key factors. First, CO hotspots are extremely rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to this project area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology in the vehicle fleet. Finally, the project would not contribute to the levels of congestion that would be needed to produce the amount of emissions needed to trigger a potential CO hotspot. Screening analysis guidelines for localized CO hotspot analyses from Caltrans recommend that projects in CO attainment areas focus on emissions from traffic intersections where air quality may get worse (Caltrans 2010). Specifically, projects that significantly increase the percentage of vehicles operating in cold start mode, significantly increase traffic volumes, or worsen traffic flow should be considered for more rigorous CO modeling. According to the traffic study for the proposed project, level of service impacts would be considered less than significant (Kimley Horn 2017). In addition, the project would not significantly increase the percentage of vehicles operating in cold start mode or substantially worsen traffic flow.

#### *Toxic Air Contaminants*

Finally, the project would not result in any substantial emissions of TACs during the construction or operations phase. During the construction phase, the primary air quality impacts would be associated

with the combustion of diesel fuels, which produce exhaust-related particulate matter that is considered a toxic air contaminant by ARB based on chronic exposure to these emissions.<sup>2</sup> However, construction activities would not produce chronic, long-term exposure to diesel particulate matter. During long-term project operations, the project does not include typical sources of acutely and chronically hazardous TACs such as industrial manufacturing processes and automotive repair facilities. As a result, the project would not create substantial concentrations of TACs. In addition, health risk assessments are generally recommended for substantial sources of diesel particulate emissions (e.g., truck stops and warehouse distribution facilities). The project would not generate a substantial number of truck trips. Based on the limited activity of TAC sources, the project would not warrant the need for a health risk assessment associated with on-site activities. Therefore, project impacts related to TACs would be less than significant.

## **Biological Resources**

As documented in the MND, development of the larger 210-acre PUD project site would result in a less than significant impact on special-status plants. The MND found that nine special-status wildlife species are known to occur in the 201-acre PUD project site. However, the MND concluded that the Natomas Crossing Alleghany Area #2 PUD project would comply with mitigation measures from the 1994 North Natomas Community Plan Supplement EIR ("1994 NNCP SEIR") related to provision of giant garter snake habitat, burrowing owl conservation, and protection of other special-status wildlife species. The MND also would implement Mitigation Measure #8 to further reduce impact on burrowing owls. Additionally, the MND concluded that a less than significant impact on special status wildlife species would occur given the large areas of habitat area located elsewhere in the Natomas area and the fact that no nesting or communal roosting sites would be removed by the Natomas Crossing Alleghany Area #2 PUD project.

A wetlands delineation conducted by Gibson and Skordal for the Natomas Crossing Alleghany Area #2 PUD project, dated March 1997, indicated that there were three seasonal wetlands sites (#5, #6, and #7) totaling approximately 2.06 acres on the 210-acre PUD project site. The MND concluded that with implementation of Mitigation Measure #7, a less than significant impact on wetlands would occur.

The MND concluded that the Natomas Crossing Alleghany Area #2 PUD project would implement Mitigation Measure #6, which requires participation in the adopted Natomas Basin Habitat Conservation Plan (NBHCP) or otherwise fulfilling obligations to the CDFW and/or USFWS to mitigate for habitat loss

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<sup>2</sup> California Office of Environmental Health Hazard Assessment. Health Effects of Diesel Exhaust, website: [www.http://oehha.ca.gov/public\\_info/facts/dieselfacts.html](http://oehha.ca.gov/public_info/facts/dieselfacts.html).

from urban development. Thus, the MND concluded that the Natomas Crossing Alleghany Area #2 PUD project would have a less than significant impact on applicable habitat conservation plan.

In May 2003, a revised NBHCP was approved by the City of Sacramento, USFWS, and CDFW. The NBHCP is a conservation plan supporting application for incidental take permits (ITP) under Section 10(a)(1)(B) of the Endangered Species Act and under Section 2081 of the California Fish and Game Code. The purpose of the NBHCP is to promote biological conservation while allowing urban development and continuation of agriculture within the Natomas Basin. The proposed project is located within an area of North Natomas that would be required to comply with all provisions of the NBHCP (City of Sacramento 2003).

The proposed project would occupy a 10.3 acre site within the 210-acre Natomas Crossing Alleghany Area #2 PUD project site. On July 7, 2017, WSA performed a site reconnaissance survey of the project site. The results of the survey are summarized below and indicate that the proposed project would not result in any new or more severe biological resource impacts than analyzed and reported in the MND.

#### *Special-Status Plant Species*

Based upon a review of resources and databases, nine special-status plant species have been documented in the vicinity of the project site. All nine of these species are unlikely or have no potential to occur on the project site as a result of the regular, high level of disturbance and a lack of suitable habitat elements such as vernal pool or marsh habitats or alkaline or clay substrates. No special-status plant species were observed during the July 2017 site visit. Therefore, similar to the conclusions of the MND, the proposed project would not result in an impact on special-status plant species.

#### *Special-Status Wildlife Species and Habitat Conservation Plan*

Swainson's hawk may forage within the project site, but no other special-status wildlife species have potential to occur there. Based on current conditions observed during the site visit and a review of recent occurrences, it is unlikely a Swainson's hawk would nest within 0.25 mile of the project site. The project site is not within the NBHCP Swainson's hawk zone; however, the project site is within 1 to 5 miles of documented nest sites and habitat mitigation for loss of foraging habitat may be required.

The project site is within the Natomas Basin Habitat Conservation Plan (NBHCP) Permit Area, and projects may obtain authorization for take and mitigation coverage through payment of in-lieu fees to the NBHCP. The Applicant has already paid NBHCP fees for the project parcel. Therefore, the project site has already fulfilled mitigation fee requirements, and no additional habitat mitigation fees, including Swainson's hawk foraging habitat, would be required.

Although Swainson's hawk has no potential to nest within the project site and is unlikely to nest within 0.25 mile of the project site, the NBHCP requires a pre-construction survey of the project site and potential nest trees within 0.25 mile in urban areas. The required pre-construction survey must be performed, regardless of potential to occur, if work is to commence during the Swainson's hawk nesting season from March 15 to September 15.

Although burrowing owls are known to the vicinity, currently the project site does not contain burrows or burrow surrogates suitable for burrowing owl, and no ground squirrels were observed in the project site or vicinity during the July 2017 site visit. A lack of ground squirrels in the vicinity reduces the potential for this species to establish in the near future, and the regular discing of the project site further reduces the likelihood that ground squirrels could successfully colonize the site. However, if management practices on the site change such that the vegetation becomes short (less than 6 inches) and discing ceases such that the soil is not disturbed so that ground squirrels may colonize the site, then there would be potential for burrowing owl to inhabit the site in the future. Thus, the proposed project would implement Mitigation Measure #8 from the MND to reduce any potential impact on burrowing owls to a less than significant level.

#### *Non Special-Status Bird Species*

Although there are no trees or other suitable nesting habitat on the project site, birds protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code may nest on the ground within the project site or in the trees in the vicinity of the project site during the nesting season. As mentioned above, the project site is within the NBHCP Permit Area, and the NBHCP requires a pre-construction survey of the project site and potential nest trees within 0.25 mile in urban areas, regardless of potential to occur, if work is to commence from March 15 to September 15. Furthermore, as noted above, the proposed project would implement Mitigation Measure #8. Thus, potential impacts to nesting birds would be avoided.

#### *Sensitive Natural Communities*

The entirety of the project site is highly disturbed and almost entirely plowed. The project site is comprised of the ruderal herbaceous biological community, which is not a sensitive community. Therefore, the proposed project would not impact any sensitive natural communities.

#### *Jurisdictional Waters*

The majority of the project site is characterized by species typical of dry conditions and no strong wetland indicators were observed during preliminary investigations. As such, no potential wetland features were

mapped. As a result Mitigation Measure #7 from the MND is not applicable. Thus, similar to the Natomas Crossing Alleghany Area #2 PUD project, a less than significant impact to jurisdictional waters would occur.

#### *Wildlife Corridors*

The proposed project is within an urban area that has been previously disturbed and developed. Therefore, the proposed project would not impact any wildlife corridors.

In summary, all impacts would be less than significant or less than significant with implementation of applicable mitigation measures found in the MND.

### **Cultural Resources**

The MND noted that the Natomas Crossing Alleghany Area #2 PUD project site was identified as a Primary Impact Area in the City of Sacramento 2035 General Plan Update Master EIR. Also, the MND stated that the site was within a medium and high sensitivity area on the Archaeological Sensitivity Map prepared by David Chavez and Associates. However based on surveys conducted for the MND, no prehistoric archaeological sites or historic properties were found within the Natomas Crossing Alleghany Area #2 PUD. The MND concluded that buried cultural resources could be encountered during construction on the site and set forth Mitigation Measure #12 to reduce the impacts to cultural resources to a less than significant level.

The project site is currently vacant with no buildings located on the project site. A review of 19th and 20th century maps shows no buildings within the project site. Therefore, there is no potential for the proposed project to affect historical resources. A Historical Resources Study was prepared for the proposed project by Tom Origer & Associates, in August 2017. A request was sent to the State of California's Native American Heritage Commission seeking information from the sacred lands files and the names of Native American individuals and groups that would be appropriate to contact regarding the proposed project. The Native American Heritage Commission responded on July 31, 2017. The results of their sacred lands file review were negative. Letters were also sent to the list of recommended Native American contacts. No additional responses have been received as of the date of this report.

Based on the results of archival research, it is anticipated that prehistoric and historic-period resources could be found within the project site. Archival research found that although a historic district (Reclamation District 1000) has been identified by studies performed within a quarter mile of the project site, the project site is located in the non-contributing resources portion of the district and does not have the potential to extend into the contributing resources section of the historic district. There are no

reported ethnographic sites within one half-mile of the study area. Additionally, an intensive field survey was completed by qualified archaeologists on August 10, 2017. No historical resources were observed during the course of the field survey. Therefore, as with the Natomas Crossing Alleghany Area #2 PUD project, there would be no significant impacts on any known archaeological resources due to the proposed project. However, there would still be a potential to encounter buried resources, including human remains, during excavation and grading and Mitigation Measure #12 in the MND would apply to the proposed project to avoid a significant impact on any resources that are encountered.

In summary, all impacts would be less than significant or less than significant with implementation of applicable mitigation measures found in the 1997 IS/MND.

## **Geology and Soils**

The MND found that the 210-acre PUD project site lies within Seismic Zone "2" where zone 0 represents the least damage and 3 represents the most damage. The closest faults and the distance of them from Sacramento are the Dunnigan Hills fault, 25 kilometers from Sacramento; the Midland fault, 35 kilometers; the Bear Mountain fault, 35 kilometers; and the New Melones fault, 65 kilometers. The MND concluded that prior to issuance of building permits, the City Planning and Development Department would require a site-specific soil investigation for individual structures proposed for development. The MND also found that if the potential for geologic, soils, or seismic hazards exists on the site, the Planning and Development Department would require that the UBC standards be met in order to ensure proper design to mitigate potential impacts. Therefore, the MND concluded that the potential for significant geology, soils, and seismic impacts created by development of the Natomas Crossing Alleghany Area #2 PUD project would be substantially lessened by the use of regulatory requirements.

A Geotechnical Engineering Report was prepared for the project site by Wallace Kuhl & Associates (WKA), in August 2017. The site specific report concluded that the potential for liquefaction of the soils beneath the site is relatively low and seismically induced settlement would be negligible. WKA found that the near-surface clay soils at the project site are expansive. The potential impact from expansive soils would be reduced to a less than significant level by following the recommendations detailed in the site specific Geotechnical Engineering Report and conformance to UBC standards. The proposed project would not utilize septic tanks and there would be no impact. In summary, similar to the conclusions in the MND, all impacts would be less than significant.

## **Greenhouse Gas Emissions**

The MND did not address potential impacts related to greenhouse gas emissions, as there was no requirement at the time to do so. Since the MND was adopted, the City has taken steps towards reducing

GHG emissions. The City adopted the City of Sacramento Climate Action Plan (CAP) on February 14, 2012, which identifies how the City and the broader community could reduce Sacramento's GHG emissions and included reduction targets, strategies, and specific actions. The Sacramento CAP was incorporated into the City of Sacramento 2035 General Plan Update and adopted on March 3, 2015. The update incorporated measures and actions from the CAP into the City of Sacramento 2035 General Plan Update. As a result, the City has determined that if a project is consistent with the goals and policies included in the City of Sacramento 2035 General Plan Update, the project would also be consistent with the City's CAP. Since the approval of the MND, a number of regulations with the purpose of, or with an underlying goal of, reducing GHG emissions, such as the California Green Building Standards Code (CALGreen Code) and the California Building Energy Efficiency Standards Code have been enacted. Such regulations have become increasingly stringent since the MND was adopted and would apply to the project. The proposed project would be consistent with the Natomas Crossing Alleghany Area #2 PUD project within the North Natomas Community Plan which is in turn consistent with the City's 2035 General Plan Update and no Community Plan or General Plan amendments are needed to implement the proposed project. As the project is consistent with the 2035 General Plan, it is also therefore consistent with the CAP. The project will also comply with regulations set forth by the CALGreen Code and California Building Energy Efficiency Standards Code. Therefore, the proposed project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. This impact is considered less than significant. No new mitigation is required.

## **Hazards and Hazardous Materials**

The MND did not analyze the impact from hazards since no construction was proposed with the application. The MND concluded that a Special Permit must be approved prior to any future development. The MND also concluded that a Phase I Preliminary Site Assessment (PSA) must be conducted for the site prior to approval of any Special Permit, including any staff level Special Permit. Any recommendations from the PSA would likely be included as mitigation measures or conditions for future development.

Although hazardous materials, including fuel, lubricants, and cleaning products, would be used on-site during project construction, compliance with local, state, and federal regulations, including NPDES regulations that require proper containment and control of hazardous materials used during construction as part of the project's stormwater pollution prevention plan, would minimize risks associated with the routine transport, use, or disposal of hazardous materials during project construction. The operation of the proposed residential project would not involve the routine transport, use, or disposal of hazardous materials, other than fuel, cleaning products, and maintenance materials. Due to the nature of the

materials and the quantities used, impacts with regard to the routine transport, use, or disposal of hazardous materials are expected to be less than significant.

Wallace-Kuhl & Associates ("WKA") prepared a Phase I Environmental Site Assessment ("ESA") for the project parcels. According to historical land use research dating back to the early 1900s the project site was used for irrigated crop or dry-farm crop cultivation from at least 1937 to at least 1998 and has been vacant land with a soil stockpile on the southern portion since at least 2005. WKA conducted a visual site reconnaissance on July 11, 2017 and observed the soil stockpile that extended to the eastern adjoining property on the southern portion of the project site. The soil stockpile was reportedly imported from adjacent properties during grading activities. Review of historical topographic maps and aerial photographs indicate that adjoining properties have a similar history of land use as the site. Therefore, WKA concluded that historical activities on the adjoining properties are unlikely to have impacted the soils. WKA also evaluated agency listings and concluded that none of the nearby listed sites had the potential to affect the project site. WKA also conducted a screening evaluation for vapor encroachment and concluded that there were no sources of vapor close enough to affect the project site.

## **Hydrology/Water Quality**

The proposed project would be subject to National Pollutant Discharge Elimination System (NPDES) requirements, and would be required to develop and implement a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP would identify measures (or Best Management Practices [BMPs]) to be implemented during construction activities to control erosion and release of sediment and other pollutants. The SWPPP would also ensure that construction activities would not cause an exceedance of the Central Valley Regional Water Quality Control Board's (CVRWQCB) water quality standards. The proposed project would increase the amount of impervious areas but would incorporate an on-site storm drain system to reduce runoff. Therefore, the project would not significantly increase the volume of runoff.

The proposed project site is located within a Special Flood Hazard Area (SFHA), as designated by the Federal Emergency Management Agency (FEMA). The SFHA requires the mandatory purchase of flood insurance applies (FEMA 2017). Within the SFHA the project site is located within Zone A99 (areas subject to inundation by the 1-percent-annual-chance flood event, but which will ultimately be protected upon completion of an under-construction federal flood protection system). The project site is within the area where the Natomas Levee Improvement Program (NLIP) is enforced which aims to upgrade the levee system protecting the Natomas Basin. With the requirements of the NLIP and implementation to policies proposed under the City of Sacramento 2035 General Plan Update, the proposed project would result in a less than significant impact related to flood risks. No new mitigation is required. Thus, the

proposed project would not result in new or more significant impacts related to hydrology and water quality.

## **Land Use and Planning**

The project site is part of the Natomas Crossing Alleghany Area #2 PUD and has the General Plan land use designation of Community Neighborhood Commercial and Offices and is zoned SC-PUD. The proposed project would not change the designated land uses of the project parcels. Thus, the proposed project would not result in significant land use impacts.

## **Noise**

The MND concluded that noise associated with construction activities is regulated by the Sacramento City Code, Chapter 66. The MND also found that buildings along Truxel Road and Arena Boulevard (North Market Boulevard) would be subjected to noise levels 60 or greater dB from noise generated by traffic on those major streets. The MND concluded that if a high or medium density residential use is proposed within the Employment Center designated areas, a noise study would be required with the Special Permit to show how potential noise impacts could be mitigated. The MND concluded that the 210-acre is not within the 60 dB CNEL noise contours of the Sacramento International Airport Comprehensive Land Use Plan (CLUP). Therefore, the MND concluded that development and operation of the various land uses under the Natomas Crossing Alleghany Area #2 PUD project was anticipated to create less than significant short-term and long-term noise impacts on the North Natomas community.

During site preparation, grading, construction, and other project construction phases, noise-generating activities would occur at the project site between the hours of 7:00 a.m. and 6:00 p.m. Monday through Friday. Section 8.68.080 of the Sacramento City Code exempts noise sources due to the erection (including excavation), demolition, alternation, or repair of any building or structure between the hours of 7 a.m. and 6 p.m., on Monday, Tuesday, Wednesday, Thursday, Friday, and Saturday, and between 9 a.m. and 6 p.m. on Sunday; provided, however, that the operation of an internal combustion engine shall not be exempt pursuant to this subsection if such engine is not equipped with suitable exhaust and intake silencers which are in good working order. Construction of the proposed project would occur within the construction time limitations set forth in the Sacramento City Code, and construction equipment would be equipped with exhaust and intake silencers in good working order. As such, construction activities performed during the exempted hours would not result in excessive noise. Additionally, construction activities are temporary in nature and would not lead to a long-term increase in ambient noise levels. Therefore, construction impacts would be considered less than significant.

Construction of the proposed project would involve the use of equipment that would cause vibration levels to increase at nearby receptors. Of the sample construction equipment, a large bulldozer is most representative of the type of construction equipment that is anticipated to be on-site during project construction. A large bulldozer would be expected to cause a maximum vibration level of approximately 0.016 PPV (inches/second) at the nearby residences to the west of the project site along Innovator Drive. These vibration levels would not exceed vibration levels at which building damage or human annoyance could occur. As a result, construction of the proposed project would not expose persons to or generation of excessive ground borne vibration. Therefore, this impact would be less than significant. No mitigation is required.

The normally acceptable noise level for multi-family residential housing, according to Table EC 1 of the City of Sacramento 2035 General Plan Update, is 65 dBA CNEL<sup>3</sup>. According to Table EC 2 of the General Plan, the maximum allowable noise increase for a community with a 55 dBA Ldn<sup>4</sup> ambient noise level is 3 dBA. The maximum allowable noise level increase for a community with a 60 dBA Ldn ambient noise level is 2 dBA Ldn. The maximum allowable noise level increase for a community with a 65 dBA Ldn ambient noise level is 1 dBA Ldn. Utilizing these criteria, a noise study as required by the MND was conducted for the project to determine the impact of traffic noise and land use compatibility.<sup>5</sup> The majority of the project's operational noise impacts would be from indirect mobile noise impacts associated with new daily vehicle trips. The impact of this additional traffic on ambient noise levels in the project's vicinity was modeled with Federal Highway Administration's Traffic Noise Model Version 2.5, comparing an existing year no project scenario to an existing year with project scenario. The increase in ambient noise levels as a result of increased project traffic noise would range from 0.3 dBA to 1.0 dBA. These increases would not exceed those limits identified in Tables EC 1 and EC 2 of the City of Sacramento 2035 General Plan Update. As a result, operation of the proposed project would not result in the exposure of persons to generation of noise levels in excess of standards established in the noise ordinance, or result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. Therefore, operational impacts would be considered less than significant.

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<sup>3</sup> Community Noise Equivalent Level (CNEL) is an Ldn with an additional 5 dBA "penalty" for the evening hours between 7:00 PM and 10:00 P.M., and a 10 dBA penalty for the hours between 10:00 PM and 7:00 AM.

<sup>4</sup> Ldn is a sound level with an additional 10 dBA "penalty" for the evening hours between 10:00 PM and 7:00 A.M.

<sup>5</sup> J.C. Brennan & Associates, Inc., *Environmental Noise Analysis Arena Boulevard Apartments*, July 2017.

## **Population and Housing**

The proposed project would add approximately 797<sup>6</sup> additional residents to the project site and the City of Sacramento. This growth is accounted for and analyzed in 2035 General Plan Update Master EIR. Thus, the proposed project would not result in new or more severe impacts related to population and housing.

## **Public Services, Including Recreation**

The MND found that the Natomas Crossing Alleghany Area #2 PUD project would not significantly impact fire services, police services, schools, parks or other recreational facilities, or other governmental services. The MND stated that the public services needed for the NNCP area have been planned for within the NNCP and the capital costs of these services would be funded through the North Natomas Financing Plan. Operation and maintenance costs would be paid for through City-wide and community-wide revenue programs. The MND concluded that changes proposed for the site would not be expected to create additional public services impacts for the project area. Additionally, participation in the North Natomas Financing Plan would be a condition of development approval.

**Fire Protection:** The 293 apartments would add approximately 797 residents to the City. The department strives to provide 1 fire station per 16,000 residents (City of Sacramento 2015). The 2035 General Plan Update Master EIR analyzed the need for twelve additional fire stations due to the expected population increase of 165,000 new residents by 2035, an estimation which includes development of the proposed project. Therefore, the need for fire prevention facilities associated with the proposed project is within the growth planned within the 2035 General Plan Update. Additionally, the proposed project would participate in the North Natomas Financing Plan which would fund any capital costs related to fire services. Similar to the conclusions of the MND, the proposed project's impact related to fire services would be less than significant.

**Law Enforcement:** The 293 apartments included in the proposed project would add approximately 797 residents to the City. The SPD strives to maintain an unofficial officer-to-service population ratio of 2.0 to 2.5 officers per 1,000 residents (City of Sacramento 2015). To meet this standard, the City would need to add up to 2 officers to serve the 797 project residents. The 2035 General Plan Update Master EIR anticipated that development would result in the addition of between 495 and 620 new police staff, including both sworn officers and civilian support staff. The growth would necessitate the remodeling of existing facilities and the construction of new facilities. The remodeling of existing facilities and the construction of new facilities was analyzed in the 2035 General Plan Update Master EIR. The proposed

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<sup>6</sup> Based on an average household size of 2.72 persons per household (DOF 2017).

project is within the growth planned under the 2035 General Plan Update. The proposed project would also participate in the North Natomas Financing Plan which would fund any capital costs related to police services. Therefore, similar to the conclusions of the MND, the proposed project would not result in new or more severe police service impacts.

**Schools:** The 293 apartments would contribute to an increase in demand for schools because the 293 additional homes would potentially generate, at most, 129 grade K-5 students, 36 grade 6–8 students, and 68 high school students, for a total of 233 students. The MND found that the Natomas Crossing Alleghany Area #2 PUD project is located within the boundaries of the Natomas Unified School District. The MND found that that the applicant shall be subject to the School Facilities Fee, adopted by the City Council on October 31, 1995 (Ordinance No. 95-061 and Resolution No. 95-624). Therefore, the MND concluded a less than significant impact would occur on school facilities.

**Libraries:** The 293 apartments would add a total of 797 residents to the City. As of 2005, the City’s library system had 0.56 square feet of library space per capita and 1.72 library volumes per capita, and therefore was meeting or exceeding the service goals of 0.5 square feet of library space per capita but did not meet the target goal of 2.15 volumes (books) per capita. However, the number of volumes has greatly increased since 2005 and the service ratio is expected to increase to 0.89 square feet of library space per capita by 2025 (City of Sacramento 2015). Furthermore, the proposed project would participate in the North Natomas Financing Plan which would fund any capital costs related to library services. Therefore, similar to the conclusions of the MND, the impact of the proposed project on library services would be less than significant. The proposed project would not result in new or more severe library impacts.

**Parks and Recreation:** The 293 apartments would contribute to an increase in demand for parkland because the project would potentially add an additional 797 residents to the City. Park acreage service level goal for areas outside the Central City is 3.5 acres of neighborhood and community parks per 1,000 population (City of Sacramento 2015). The City currently provides approximately 3.4 acres of neighborhood and community park per 1,000 persons citywide. The increased population associated with the proposed project would demand 2.8 acres of neighborhood and community parks. The proposed project would include approximately 0.7 acres of outdoor amenity and open space areas.<sup>7</sup> This would be comprised of a clubhouse area with a vast array of high end outdoor amenities such as an outdoor kitchen, television and fire place lounges, a pool, a spa, sun bathing lounge areas, and cabanas, among other features. Several smaller outdoor amenity areas are proposed around the project site that would include community gardens, grass areas for activities, picnic areas with barbeques, a hammock garden, a

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<sup>7</sup> This square footage does not include indoor amenity space such as the clubhouse building.

tot-lot, and an enclosed dog run area. In addition to providing outdoor amenity and open space areas, the applicant would satisfy the City's parkland dedication requirement by paying park in-lieu fees and other required fees. Therefore, outdoor amenities and payment of park in-lieu fees would ensure the proposed project's impact related to parks and recreational facilities remain less than significant and the proposed project would not result in new or more severe parkland impacts.

## **Transportation and Traffic**

### Natomas Crossing Alleghany Area #2 PUD IS/MND

The traffic impact analysis (TIA) prepared for the Natomas Crossing Alleghany Area #2 PUD project and reported in the MND analyzed the following 8 intersections:

- Truxel Road/ Del Paso Road
- Truxel Road/ Arena Boulevard
- Truxel Road/ Road D
- Truxel Road/ Road F
- Road J/ Arena Boulevard
- Road J/ Road D
- Road J/ Road E
- Road J/ Road F

The conclusions of the TIA indicated that the Natomas Crossing Alleghany Area #2 PUD project would add a significant number of vehicles to the existing roadway. Thus, the MND concluded that, per Mitigation Measure #9, the intersection of Road J/Road F should be signalized to mitigate significant impacts created by the Natomas Crossing Alleghany Area #2 PUD project, and the intersections of Truxel Road/Road D and Truxel Road/Road F should be signalized in order to provide access to and from Truxel Road. The Natomas Crossing Alleghany Area #2 PUD project was conditioned to construct these signals with the first phase of development. The MND concluded that it could be possible to defer the use of the signal(s) until actual traffic volumes increase to a point where each signal would be needed.

The MND also concluded that to mitigate the impacts of increased traffic, the applicant must comply with the City Zoning Ordinance related to transportation systems management. The MND found that implementation of Mitigation Measure #10, which requires preparation of a Transportation Management Plan, would promote efficient utilization of existing transportation facilities and result in a 35 percent reduction in peak hour trips for the site to the satisfaction of the Public Works Director. Thus, the MND concluded that the regional traffic impacts were significant unavoidable impacts overridden in conjunction with the adoption of the North Natomas Community Plan and the local impacts of the Natomas Crossing Alleghany Area #2 PUD project would be mitigated to a less than significant level.

## Project Traffic Study

In August 2017, Kimley-Horn conducted a traffic assessment of the proposed project.<sup>8</sup> The purpose of the assessment was to evaluate traffic access and circulation of the proposed project on the immediately adjacent transportation system, limited to consideration of Existing and Existing plus Proposed Project Conditions. The assessment evaluated two intersections: Innovator Drive/Arena Boulevard and Innovator Drive/Prosper Road.

The proposed project is estimated to generate 1,796 daily, 138 AM peak-hour, and 167 PM peak-hour vehicle trips entering and exiting the project driveways. The project trip distribution percentages show that due to the close proximity of the proposed project to Interstate-5, 70 percent of the project traffic is expected to travel west along Arena Boulevard. Due to similar reasons, 20 percent of the project traffic is expected to travel south along Truxel Road towards Interstate-80 and the commercial area along Gateway Park Boulevard. The remaining 10 percent of project trips are expected to travel east along Arena Boulevard and north along Truxel Road in approximately equal volumes. Due to the close proximity of the proposed project to Arena Boulevard, the project driveway located on Innovator Drive was assumed to be the main driveway handling approximately 75 percent of the project traffic. Both driveways were assumed to be full access given the presence of a two way left turn lane along both Innovator Drive and Prosper Road.

The traffic assessment found that under Existing (2017) conditions, both study intersections would operate between acceptable LOS A and D for both the AM and PM peak hours. Under Existing (2017) plus Proposed Project conditions, both study intersections would continue to operate between LOS A and D for both the AM and PM peak hour indicating that the addition of the proposed project would not trigger any significant impacts to the immediate roadway network. The additional 293 units would not cause new significant impacts at the study intersections under Existing (2017) plus Proposed Project conditions.

## General Plan Update Master EIR Traffic Analysis

The City's 2035 General Plan Update Master EIR is the most current and applicable document that analyzes the cumulative transportation and circulation impacts of growth within the City of Sacramento. As noted earlier, the proposed project would be consistent with the Natomas Crossing Alleghany Area #2 PUD project within the North Natomas Community Plan which is in turn consistent with the City's 2035

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<sup>8</sup> Kimley Horn. 2017. *Spanos Apartments, Arena Boulevard #11-56-04*, August.

General Plan Update and no Community Plan or General Plan amendments are needed to implement the proposed project. As the project is consistent with the 2035 General Plan, therefore, the cumulative traffic impacts of planned development on the project site were analyzed in the 2035 General Plan Update Master EIR. The 2035 General Plan Update Master EIR found that although implementation of the 2035 General Plan Update would result in daily traffic volume increases, the roadway segments of Arena Boulevard and Truxel Road near the proposed project site would operate at acceptable LOSs ranging from LOS A through LOS D. Therefore the intersection at Arena Boulevard and Truxel Road would also operate at an acceptable level. The 2035 General Plan Update Master EIR concluded that there would be less than significant LOS impacts based on the 2035 horizon year analysis. The 2035 General Plan Update Master EIR also concluded that through adherence to policies of the General Plan, the impact to transit, bicycle facilities, pedestrian circulation would be less than significant.

### **Tribal Cultural Resources**

At the time the MND was prepared, CEQA did not require an analysis of impacts to tribal cultural resources due to project implementation. AB 52, which was approved in September 2014 and became effective on July 1, 2015, requires that CEQA lead agencies consult with California Native American tribes that are traditionally and culturally affiliated with the geographic area of a project, if so requested by the tribes. AB 52 applies only to projects where the MND was adopted after July 1, 2015. The MND for the Natomas Crossing Alleghany Area #2 PUD project was adopted in 1997, and as an element of the previously approved planned development, the proposed project is not subject to AB 52.

### **Utilities and Service Systems**

The MND concluded that the increase in impervious surfaces resulting from the development of the Natomas site would increase run-off. To mitigate any negative effects related to drainage, future projects must incorporate an on-site storm drain system. The MND concluded that after implementation of Mitigation Measure #3, the impact relating to drainage would be less than significant. With regards to sewer service, the MND declared that the County of Sacramento would provide sanitary services to the 210-acre PUD site but any extension or installation of sewer service would be the responsibility of the developer. The MND concluded the impact to sanitary sewer would be less than significant. The MND also concluded less than significant impacts to solid waste and recycling, as future developments would be subject to Section 34 of the Zoning Ordinance, which mandates the development of a recycling program and an approved Special Permit. The MND concluded that, prior to the development of a project, the project proponent must incorporate SMUD energy efficiency programs where feasible. As determined in the MND, incorporation of such programs would reduce any impacts relating to energy to a less than significant level.

Water Supply: The City of Sacramento would provide water service to the project. New water pipelines would be constructed throughout the project site and would connect to the existing water main located within Prosper Road. The 2035 General Plan Update Master EIR concluded that the City would have sufficient water supplies through the year 2035. The proposed project is within the growth planned under the 2035 General Plan Update. Therefore, the proposed project would not result new significant water supply impacts.

Sanitary Sewer: The Sacramento Area Sewer District (SASD) would provide sanitary sewer service to the project site. Proposed 6 to 8-inch sanitary sewer lines from Buildings 1, 3, 4, 5, 6 and the Clubhouse would connect to existing sanitary sewer lines in Arena Boulevard or Prosper Road. Proposed 6-inch sanitary sewer line from Building 2 would connect to existing sanitary sewer lines in the future private road. The proposed project would increase the amount of wastewater. However, a regional connection fee would be paid to the SASD for connecting to or expanding sewer collection systems. Therefore, the proposed project would not result new significant sanitary sewer impacts.

Stormwater: The project site is currently served by the City of Sacramento for storm drainage. A storm drain system is proposed for the project site that would connect to the existing storm drains within Innovator Drive and the future private road. All roof drains would be tight-lined to the storm drain system. As the project site is currently vacant, development of the proposed project would substantially increase the amount of impervious surfaces on the site. However, per the MND, the proposed project would incorporate an on-site storm drain system to reduce runoff. The State Water Resources Control Board (SWRCB) and Regional Water Quality Control Board (RWQCB) are responsible for stormwater pollution control in the City. Stormwater pollution control is implemented through the use of National Pollution Discharge Elimination System (NPDES) permits. The City of Sacramento is responsible for ensuring compliance with the stormwater pollution control standards. Therefore, although there would be an increase in impervious areas on the project site, the proposed project would comply with the requirements of the NPDES permits. The proposed project would not result in new significant stormwater impacts.

Solid Waste: Solid wastes from the proposed project would be disposed of at the Sacramento County Kiefer Landfill. The landfill is permitted to accept up to 10,815 tons of solid wastes per day, averaging 6,300 tons per day (City of Sacramento 2015). When applying the solid waste generation factor for residential land uses, the occupancy and operation of the 293 units would generate approximately 1.80 tons of solid waste per day. Current peak and average daily disposal at the Sacramento County Kiefer Landfill is significantly lower than the current permitted amounts (City of Sacramento 2015). Thus, the proposed project would be served by the landfill with sufficient permitted capacity to accommodate project solid waste disposal needs and no new solid waste impact would occur.

Electric and Natural Gas: The project site would be served by Sacramento Municipal Utility District (SMUD for purposes of electricity and Pacific Gas and Electric (PG&E) for natural gas. The proposed project is within the planned growth of the 2035 General Plan Update and is accounted for in the 2035 General Plan Update Master EIR. Thus, with policies set forth in the 2035 General Plan Update, the proposed project would be accommodated by SMUD and PG&E. There would be less than significant impacts from increased electricity and natural gas usage associated with the proposed project.

## **Conclusion**

As established in the discussions above regarding the potential impacts of the proposed project, substantial changes are not proposed to the project nor have any substantial changes occurred with respect to the circumstances under which the project is undertaken that would require major revisions to the MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Impacts beyond those identified and analyzed in the MND would not be expected to occur as a result of the proposed project. Overall, the proposed changes to the previously-approved project would not result in any new information of substantial importance that would have new, more severe impacts, new mitigation measures, or new or revised alternatives from what was identified for the previously-approved project in the MND. Therefore, the City of Sacramento's Community Development Department concludes that the analyses conducted and the conclusions reached in the MND remain relevant and valid. As such, based on the record as a whole, there is no substantial evidence to support a fair argument that the proposed project may result in significant environmental impacts not previously studied in the MND and, accordingly, the project changes would not result in any conditions identified in CEQA Guidelines Section 15162. Thus, a subsequent EIR or MND is not required for the changes to the project. The proposed project would remain subject to all applicable previously required mitigation measures from the MND.

## **Supporting Information Sources**

City of Sacramento. 1997. Natomas Crossing Alleghany Area #2 PUD Project IS/MND.

City of Sacramento. 2006 . The Plaza (P06-070) Addendum to an Adopted Negative Declaration.

City of Sacramento. 2015. 2035 General Plan Update Master Environmental Impact Report.

City of Sacramento. 2015. 2035 General Plan Update.

J.C. Brennan & Associates, Inc. 2017. Acoustical Study for the Arena Boulevard Apartments. July.

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