

October 15, 2025

To: Scott Johnson, Senior Planner
City of Sacramento Community Development Department
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811

**Subject: Airport South Industrial Project – Habitat Conservation
Plan Mitigation Lands Memorandum**

Mr. Johnson:

Raney Planning and Management, Inc. has prepared this memorandum to address further clarifications to the Airport South Industrial Project (proposed project) related to implementation of the off-site agricultural/open space requirements that were identified in Mitigation Measure 4.2-1 in the Draft Environmental Impact Report (EIR). Specifically, the project applicant has elected to include as part of the proposed project the preservation of the 50-acre habitat mitigation property (Assessor's Parcel Number [APN] 225-0020-014) and preservation of the 67.59-acre habitat mitigation property (APN 225-0020-015) which are also listed in section b of Mitigation Measure 4.2-1 (i.e., the Rosa Properties).

This memorandum documents the revisions to the EIR that further clarify and amplify the applicant's commitment to implement the conservation measures specified in the Natomas Basin Habitat Conservation Plan (NBHCP) as part of the proposed project in furtherance of the proposed annexation request and in response to comments that the City received on the Draft EIR. This memorandum includes a description of the proposed clarifications to the proposed project description, as well as an evaluation of the associated environmental impacts related to preservation of the above-noted properties relative to the project impacts evaluated in the Airport South Industrial Project EIR. The intent is to present an analysis of whether the changes alter the analysis in the Final EIR, as well as whether the changes necessitate recirculation pursuant to Section 15088.5 of the California Environmental Quality Act (CEQA) Guidelines. The information and discussion of the proposed changes set forth below demonstrate that the revisions to the proposed project in response to comments received on the Draft EIR and are consistent with the analyses and conclusions presented in the Final EIR and do not constitute "significant new information" that would necessitate recirculation of the Draft EIR.

Preservation of Habitat Conservation Plan Mitigation Lands

As discussed above, the project applicant intends to preserve the Rosa Properties as part of the proposed project consistent with the NBHCP preservation requirements set forth in Chapter IV of the NBHCP, as further discussed in Chapter 4.4 Biological Resources. As such, a total of 117.59 acres of off-site lands in the Natomas Basin would be dedicated to The Natomas Basin Conservancy (TNBC) for the preservation and management in perpetuity of open space/agricultural lands.

The project site is near existing TNBC reserves. The dedication of the Rosa Properties would result in TNBC completing a required 400-acre minimum size reserve in proximity to Fisherman's Lake, located southeast of the project site. The proposed reserve sites would improve connectivity of

habitats and TNBC reserves as contemplated in the NBHCP (see pages IV-8 through IV-11 of the NBHCP). The dedication of the Rosa Properties would also ensure the continued connectivity of canal habitats and TNBC reserves in the project area and would help to ensure that the Natomas Basin's giant garter snake population is not divided into two smaller, and thus less viable, populations, as well as provide suitable Swainson's Hawk foraging habitat in the Basin.

The project developer would dedicate proposed off-site mitigation reserves to TNBC, and would pay NBHCP fees that provide an endowment sufficient for the required management in perpetuity in accordance with the NBHCP. The reserves would be managed as described in NBHCP sections VI-D, V-B, VI-E, VI-F, and VI-G (Conservation Plan – Reserve/Management/Site Specific Management Plans; Take Avoidance, Minimization, and Mitigation; and Plan Implementation-Monitoring of the NBHCP, Adaptive Management, Annual Report, respectively) or comparable management would be developed in consultation with the U.S. Fish and Wildlife Service (USFWS) and incorporated into a new HCP or an amendment to the NBHCP to cover the portion of the project site outside of the City's permit area. As described in sections VI-D, V-B, VI-E, VI-F, and VI-G of the NBHCP, management would include:

- Development of a site-specific management plan;
- Implementation of measures to reduce take of covered species as a result of restoration and reserve management;
- Implementation of the NBHCP's conservation strategies for covered species on the reserves;
- Management activities that include invasive plant control, domestic/feral animal control, and restricting public access and patrolling reserves to enforce restrictions;
- Compliance and biological effectiveness monitoring; and
- An annual reporting and review meeting to cover progress toward meeting goals, implementation, monitoring, and adaptive management measures.

If the proposed project is annexed to the City, the dedication of the proposed reserves and their endowments would occur prior to the City of Sacramento issuance of a Notice to Proceed (NTP) for any grading (ground disturbance) on the project site, consistent with the requirements of the NBHCP Implementation Agreement (IA) and the City's incidental take permit (ITP).

Analysis of Environmental Impacts and Recirculation of the Draft EIR

Pursuant to CEQA Guidelines Section 15088.5(a), a lead agency is required to recirculate a Draft EIR if "significant new information" is added after the lead agency circulates the Draft EIR but before certification. Significant new information is defined as information that changes the Draft EIR "...in a way that deprives the public of a meaningful opportunity to comment on..." a significant impact, a feasible way to mitigate an impact, or a feasible way to avoid an impact. The following identifies circumstances that would be considered "significant new information" that would trigger recirculation:

- Information that shows a new significant impact;
- Information that shows an increase in the severity of an impact (unless mitigation measures are identified to reduce it to acceptable levels);
- Information that identifies a feasible new alternative or mitigation measure considerably different from other analyzed alternatives or mitigation measures that would clearly lessen project impacts and the applicant declines to implement the measure; and/or
- Information that demonstrates that the Draft EIR was fundamentally flawed, basically inadequate, and conclusory in nature, thus, precluding meaningful public review and comment.

Pursuant to CEQA Guidelines Section 15088.5(b), recirculation is not required if the information added to an EIR merely clarifies, amplifies, or makes insignificant modifications the EIR.

As previously discussed, the project applicant has elected to include preservation of the Rosa Properties as part of the proposed project. The parcels consist entirely of vacant grasslands and have a history of agricultural use. As such, a total of 117.59 acres of off-site lands in the Natomas Basin would be dedicated to TNBC for the preservation and management in perpetuity of open space/agricultural lands.

Table 1 below demonstrates that the proposed changes do not constitute “significant new information,” as the preservation of the Rosa Properties (APNs 225-0020-014 and 225-0020-015) would not result in a new significant impact or substantially more severe significant impact beyond the impacts evaluated in the Draft EIR. Furthermore, new information that identifies a new alternative or mitigation measures significantly different from those already studied and that the applicant declines to implement have not been identified. In fact, this memorandum includes revisions and clarifications to the project description because the applicant has agreed to include additional preservation lands in the Natomas Basin consistent with the mitigation measures described in Chapter 4.2 of the Draft EIR. Lastly, the proposed changes do not include information indicating that the Draft EIR was fundamentally flawed, basically inadequate, or conclusory in nature. Rather, any new information clarifies or amplifies the analysis and demonstrates that the project changes are consistent with the analysis in the Draft EIR and do not create any new significant impacts.

Table 1 Analysis of Environmental Impacts Associated with the Proposed Changes	
Draft EIR Conclusion	Evaluation of Proposed Changes
Chapter 4.1 – Aesthetics	
The Draft EIR concludes the proposed project would result in a less-than-significant impact related to the following: • Have a substantial adverse effect on a scenic vista. • Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway. • Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. • Creation of new sources of light or glare associated with cumulative development of the proposed project in combination with future buildout of the City of Sacramento 2040 General Plan. In addition, the Draft EIR concludes that feasible mitigation is not available, and, thus, the proposed project would result in a significant and unavoidable impact related to the following:	Preservation of the Rosa Properties consistent with Mitigation Measure 4.2-1 would not result in the development of any urban uses on-site, as lands would be restricted for conservation under the HCP, and would be required to remain in their existing state (i.e., as either open space or agricultural lands) in perpetuity. Thus, preservation of the Rosa Properties would not result in any increased development on-site as compared to existing allowed use. In addition, as discussed above, TNBC would implement NBHCP preservation and management requirements set forth in Chapters VI and V of the NBHCP to ensure all applicable NBHCP requirements are met. Based on the above, new significant impacts or substantially more severe significant impacts would not occur as a result of preservation of the Rosa Properties as part of the project beyond the impacts that were previously evaluated in the Draft EIR. Therefore, the proposed clarifications and amplifications to the project description are

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Draft EIR Conclusion	Evaluation of Proposed Changes
• In a non-urbanized area, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from a publicly accessible vantage point). • Long-term changes in visual character associated with cumulative development of the proposed project in combination with future buildout of the City of Sacramento 2040 General Plan and the Sacramento County General Plan.	consistent with the analysis and conclusions of the Draft EIR.
Chapter 4.2 – Agricultural Resources	
The Draft EIR concludes the proposed project would result in a less-than-significant impact related to the following: • Impacts related to conflicts with existing zoning for agricultural uses or Williamson Act contracts. • Impacts related to involving other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural uses or conversion of forest land to non-forest uses. In addition, the Draft EIR concludes that even with implementation of mitigation, the proposed project would result in a significant and unavoidable impact related to the following: • Impacts related to the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. • Impacts related to compliance with the requirements of the Cortese-Knox-Hertzberg act (Government Code, Section 56000 et. seq.) pertaining to the conversion of agricultural land. • Impacts related to cumulative loss of agricultural land.	The developer would preserve the Rosa Properties and would ensure successful implementation of the off-site agricultural/open space requirements identified in section b of Mitigation Measure 4.2-1 set forth in the Draft EIR. However, the proposed project would still require implementation of the remaining requirements in sections a and c through e of Mitigation Measure 4.2-1. In addition, while preservation of the Rosa Properties would be beneficial in addressing the impacts to agricultural resources identified in the Draft EIR, the proposed project would still result in the conversion of agricultural land to urban uses and would not create new agricultural land; as such, the proposed project would lead to an overall loss of Farmland. Therefore, the significant and unavoidable impacts identified in the Draft EIR would remain. Nonetheless, preservation of the Rosa Properties consistent with the Draft EIR Mitigation Measure 4.2-1 would not result in the development of any urban uses on-site, as lands would be restricted for conservation under the HCP, and would be required to remain in their existing state (i.e., as either open space or agricultural lands) in perpetuity. Thus, preservation of the Rosa Properties would not result in an increased loss to agricultural resources as compared to existing allowed uses. In addition, as discussed above, TNBC would implement NBHCP preservation and management requirements set forth in Chapters VI and V of the NBHCP to ensure all applicable NBHCP requirements are met. Based on the above, the developer's agreement to preserve the Rosa Properties consistent with

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Draft EIR Conclusion	Evaluation of Proposed Changes
	Mitigation Measure 4.2-1 would not result in new significant impacts or substantially more severe significant impacts beyond the impacts identified in the Draft EIR. Therefore, the proposed clarifications and amplifications to the project description are consistent with the analysis and conclusions of the Draft EIR.
Chapter 4.3 – Air Quality, Greenhouse Gas Emissions, and Energy	
The Draft EIR concludes the proposed project would result in a less-than-significant impact related to the following: • Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. • Result in the inefficient or wasteful use of energy, or conflict with a State or local plan for renewable energy or energy efficiency. • Result in a cumulatively considerable inefficient or wasteful use of energy or conflict with a State or local plan for renewable energy or energy efficiency. In addition, the Draft EIR concludes that with implementation of mitigation, the proposed project would result in a less-than-significant impact related to the following: • Conflict with or obstruct implementation of the applicable air quality plan during project construction. • Expose sensitive receptors to substantial pollutant concentrations. • Generation of GHG emissions that may have a significant impact on the environment or conflict with an applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. Finally, the Draft EIR concludes that even with implementation of mitigation, the proposed project would result in a significant and unavoidable impact related to the following: • Conflict with or obstruct implementation of the applicable air quality plan during project operation. • Result in a cumulatively considerable net increase of any criteria pollutant for which	Preservation of the Rosa Properties consistent with Mitigation Measure 4.2-1 would not result in the development of any urban uses on-site, as lands would be restricted for conservation under the HCP, and would be required to remain in their existing state (i.e., as either open space or agricultural lands) in perpetuity. Thus, preservation of the Rosa Properties would not result in any increased air pollutant/greenhouse gas (GHG) emissions or energy demand as compared to emissions or energy demand associated with existing allowed agricultural and open space uses. In addition, as discussed above, TNBC would implement NBHCP preservation and management requirements set forth in Chapters VI and V of the NBHCP to ensure all applicable NBHCP requirements are met. Based on the above, new significant impacts or substantially more severe significant impacts would not occur as a result of preservation of the Rosa Properties beyond the impacts that were previously evaluated in the Draft EIR. Therefore, the proposed clarifications and amplifications to the project description are consistent with the analysis and conclusions of the Draft EIR.

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the project region is in non-attainment under an applicable federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).	
Chapter 4.4 – Biological Resources	
The Draft EIR concludes the proposed project would result in a less-than-significant impact related to the following: • Have a substantial adverse effect, either directly or through habitat modifications, on monarch butterfly. • Have a substantial adverse effect, either directly or through habitat modifications, on Aleutian cackling goose, white-faced ibis, and tricolored blackbird. • Conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or State habitat conservation plan. In addition, the Draft EIR concludes that with implementation of mitigation, the proposed project would result in a less-than-significant impact related to the following: • Impacts to special-status plant species, either directly (e.g., threaten to eliminate a plant community) or through substantial habitat modifications. • Have a substantial adverse effect, either directly or through habitat modifications, on giant garter snake. • Have a substantial adverse effect, either directly or through habitat modifications, on northwestern pond turtle. • Have a substantial adverse effect, either directly or through habitat modifications, on Swainson's hawk. • Have a substantial adverse effect, either directly or through habitat modifications, on burrowing owl. • Have a substantial adverse effect, either directly or through habitat modifications, on loggerhead shrike. • Have a substantial adverse effect, either directly or through habitat modifications, on northern harrier, white-tailed kite, song sparrow, and other nesting birds and raptors protected under the MBTA and CFGC.	The dedication of the Rosa Properties would also ensure the continued connectivity of canal habitats and TNBC reserves in the project area and would help to ensure that the Basin's giant garter snake population is not divided into two smaller, and thus less viable, populations, as well as provide suitable Swainson's Hawk foraging habitat. In addition, dedication of the Rosa Properties would help to ensure that the proposed project preserves suitable Swainson's Hawk foraging habitat at a 1:1 ratio, as required by the NBHCP. Overall, preservation of the Rosa Properties would be beneficial in addressing the impacts to biological resources identified in the Draft EIR, by providing additional lands to be preserved as habitat for special-status species in the project area consistent with the NBHCP. In addition, preservation of the Rosa Properties consistent with Mitigation Measure 4.2-1 would not result in the development of any urban uses on-site, as lands would be restricted for conservation under the HCP, and would be required to remain in their existing state (i.e., as either open space or agricultural lands) in perpetuity. Thus, preservation of the Rosa Properties would not result in any increased habitat modifications in the project area as compared to the land disturbance associated with the existing allowed uses. Furthermore, as discussed above, TNBC would implement NBHCP preservation and management requirements set forth in Chapters VI and V of the NBHCP to ensure all applicable NBHCP requirements are met. Finally, given that the Rosa Properties would be required to remain in their existing state in perpetuity, preservation of the Rosa Properties would not result in any impacts to special-status species. Based on the above, new significant impacts or substantially more severe significant impacts would not occur as a result of preservation of the

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• Have a substantial adverse effect on any riparian habitat or other Sensitive Natural Community identified in local or regional plans, policies, regulations or by the CDFW or USFWS. • Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. • Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. • Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. • Cumulative loss of habitat for special-status species.	Rosa Properties beyond the impacts that were evaluated in the Draft EIR. Therefore, the proposed clarifications and amplifications incorporated into the project description are consistent with the analysis and conclusions of the Draft EIR.
Chapter 4.5 – Cultural Resources	
The Draft EIR concludes the proposed project would result in a less-than-significant impact related to the following: • Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines, Section 15064.5. • Cause a cumulative loss of cultural resources. In addition, the Draft EIR concludes that with implementation of mitigation, the proposed project would result in a less-than-significant impact related to the following: • Cause a substantial adverse change in the significance of a unique archeological resource pursuant to CEQA Guidelines, Section 15064.5 or disturb human remains, including those interred outside of dedicated cemeteries.	Preservation of the Rosa Properties consistent with Mitigation Measure 4.2-1 would not result in the development of any urban uses on-site, as lands would be restricted for conservation under the HCP, and would be required to remain in their existing state (i.e., as either open space or agricultural lands) in perpetuity. Thus, preservation of the Rosa Properties would not result in any increased ground disturbance as compared to existing allowed uses of the preserve sites. In addition, as discussed above, TNBC would implement NBHCP preservation and management requirements set forth in Chapters VI and V of the NBHCP to ensure all applicable NBHCP requirements are met. Based on the above, new significant impacts or substantially more severe significant impacts would not occur as a result of preservation of the Rosa Properties beyond the impacts that were evaluated in the Draft EIR. Therefore, the proposed clarifications and amplifications to the project description are consistent with the analysis and conclusions of the Draft EIR.

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Chapter 4.6 – Geology and Soils	
The Draft EIR concludes the proposed project would result in a less-than-significant impact related to the following: • Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides. • Result in substantial soil erosion or the loss of topsoil. • Cumulative impacts to geology, soils, seismicity, and paleontological resources. In addition, the Draft EIR concludes that with implementation of mitigation, the proposed project would result in a less-than-significant impact related to the following: • Be located on a geological unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, or be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code. • Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	Preservation of the Rosa Properties consistent with Mitigation Measure 4.2-1 would not result in the development of any urban uses on-site, as lands would be restricted for conservation under the HCP, and would be required to remain in their existing state (i.e., as either open space or agricultural lands) in perpetuity. Thus, preservation of the Rosa Properties would not result in any increased ground disturbance as compared to existing allowed use. In addition, as discussed above, TNBC would implement NBHCP preservation and management requirements set forth in Chapters VI and V of the NBHCP to ensure all applicable NBHCP requirements are met. Based on the above, new significant impacts or substantially more severe significant impacts would not occur as a result of preservation of the Rosa Properties beyond the impacts that were previously evaluated in the Draft EIR. Therefore, the proposed clarifications and amplifications to the project description are consistent with the analysis and conclusions of the Draft EIR.
Chapter 4.7 – Hazards and Hazardous Materials	
The Draft EIR concludes the proposed project would result in a less-than-significant impact related to the following: • Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. • Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. • Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.	Preservation of the Rosa Properties consistent with Mitigation Measure 4.2-1 would not result in the development of any urban uses on-site, as lands would be restricted for conservation under the HCP, and would be required to remain in their existing state (i.e., as either open space or agricultural lands) in perpetuity. Thus, preservation of the Rosa Properties would not result in any increased transport, use, storage, disposal, or release of hazardous materials, or increased hazardous conditions, as compared to existing allowed use. In addition, as discussed above, TNBC would implement NBHCP preservation and management requirements set forth in Chapters VI and V of the NBHCP to ensure all applicable NBHCP requirements are met.

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• Cumulative exposure to potential hazards and increases in the transport, storage, and use of hazardous materials. In addition, the Draft EIR concludes that with implementation of mitigation, the proposed project would result in a less-than-significant impact related to the following: • Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment. • For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area.	Based on the above, new significant impacts or substantially more severe significant impacts would not occur as a result of preservation of the Rosa Properties beyond the impacts that were previously evaluated in the Draft EIR. Therefore, the proposed clarifications and amplifications to the project description are consistent with the analysis and conclusions of the Draft EIR.
Chapter 4.8 – Hydrology and Water Quality	
The Draft EIR concludes the proposed project would result in a less-than-significant impact related to the following: • Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin or conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. • Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; or create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. • Cumulative impacts related to the violation of water quality standards or waste discharge requirements, and impacts	Preservation of the Rosa Properties consistent with Mitigation Measure 4.2-1 would not result in the development of any urban uses on-site, as lands would be restricted for conservation under the HCP, and would be required to remain in their existing state (i.e., as either open space or agricultural lands) in perpetuity. Thus, preservation of the Rosa Properties would not result in any increased ground disturbance, impervious surfaces on-site, or groundwater demand as compared to existing allowed use. In addition, as discussed above, TNBC would implement NBHCP preservation and management requirements set forth in Chapters VI and V of the NBHCP to ensure all applicable NBHCP requirements are met. Based on the above, new significant impacts or substantially more severe significant impacts would not occur as a result of preservation of the Rosa Properties beyond the impacts that were previously evaluated in the Draft EIR. Therefore, the proposed clarifications and amplifications to the project description are consistent with the analysis and conclusions of the Draft EIR.

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Draft EIR Conclusion	Evaluation of Proposed Changes
resulting from the alteration of existing drainage patterns. In addition, the Draft EIR concludes that with implementation of mitigation, the proposed project would result in a less-than-significant impact related to the following: • Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality during construction. • Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality during operations. • Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows, or in flood hazard, tsunami, or seiche zone, risk release of pollutants due to project inundation.	
Chapter 4.9 – Land Use and Planning/Population and Housing	
The Draft EIR concludes the proposed project would result in a less-than-significant impact related to the following: • Cause a significant environmental impact due to physically dividing an established community. • Cause a significant environmental impact due to a conflict with any Sacramento LAFCo plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. • Cause a significant environmental impact due to a conflict with the City of Sacramento 2040 General Plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. • Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (e.g., through projects in an undeveloped area or extension of major infrastructure). • Cause a significant cumulative environmental impact due to a conflict with	Preservation of the Rosa Properties consistent with Mitigation Measure 4.2-1 would not result in the development of any urban uses on-site, as lands would be restricted for conservation under the HCP, and would be required to remain in their existing state (i.e., as either open space or agricultural lands) in perpetuity. Thus, preservation of the Rosa Properties would not result in any increased development or population growth as compared to existing allowed use, as the existing land use of the properties would not change. In addition, as discussed above, TNBC would implement NBHCP preservation and management requirements set forth in Chapters VI and V of the NBHCP to ensure all applicable NBHCP requirements are met. Based on the above, new significant impacts or substantially more severe significant impacts would not occur as a result of preservation of the Rosa Properties beyond the impacts that were previously evaluated in the Draft EIR. Therefore, the proposed clarifications and amplifications to the

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any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. • Cause a significant cumulative environmental impact due to cumulative substantial unplanned population growth.	project description are consistent with the analysis and conclusions of the Draft EIR.
Chapter 4.10 – Noise	
The Draft EIR concludes the proposed project would result in a less-than-significant impact related to the following: • Generation of a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. • Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels. • For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose persons residing or working in the project area to excessive noise levels. • Generation of a substantial permanent increase in ambient noise levels associated with development of the proposed project in combination with future development. In addition, the Draft EIR concludes that with implementation of mitigation, the proposed project would result in a less-than-significant impact related to the following: • Generation of a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	Preservation of the Rosa Properties consistent with Mitigation Measure 4.2-1 would not result in the development of any urban uses on-site, as lands would be restricted for conservation under the HCP, and would be required to remain in their existing state (i.e., as either open space or agricultural lands) in perpetuity. Thus, preservation of the Rosa Properties would not result in any temporary or permanent noise level or vibration increases as compared to existing allowed use. In addition, as discussed above, TNBC would implement NBHCP preservation and management requirements set forth in Chapters VI and V of the NBHCP to ensure all applicable NBHCP requirements are met. Based on the above, new significant impacts or substantially more severe significant impacts would not occur as a result of preservation of the Rosa Properties beyond the impacts that were previously evaluated in the Draft EIR. Therefore, the proposed clarifications and amplifications to the project description are consistent with the analysis and conclusions of the Draft EIR.
Chapter 4.11 – Public Services, Utilities, and Service Systems	
The Draft EIR concludes the proposed project would result in a less-than-significant impact related to the following: • Result in substantial adverse physical impacts associated with the provision of new	Preservation of the Rosa Properties consistent with Mitigation Measure 4.2-1 would not result in the development of any urban uses on-site, as lands would be restricted for conservation under the HCP, and would be required to remain in their existing state (i.e., as either open space or

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or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. • Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection services. • Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable performance objectives for schools. • Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable performance objectives for parks or other government services; or result in an increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, or include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. • Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. • Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.	agricultural lands) in perpetuity. Thus, preservation of the Rosa Properties would not result in any increased demand for public services or utilities as compared to existing allowed use. In addition, as discussed above, TNBC would implement NBHCP preservation and management requirements set forth in Chapters VI and V of the NBHCP to ensure all applicable NBHCP requirements are met. Based on the above, new significant impacts or substantially more severe significant impacts would not occur as a result of preservation of the Rosa Properties beyond the impacts that were previously evaluated in the Draft EIR. Therefore, the proposed clarifications and amplifications to the project description are consistent with the analysis and conclusions of the Draft EIR.

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• Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. • Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, or conflict with federal, State, and local management and reduction statutes and regulations related to solid waste. • Cumulative impacts to public services. • Increase in demand for utilities and service systems associated with the proposed project, in combination with future buildout of the Sacramento General Plan.	
Chapter 4.12 – Transportation	
The Draft EIR concludes the proposed project would result in a less-than-significant impact related to the following: • Conflict with a program, plan, ordinance, or policy addressing the circulation system during construction activities. • Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment) or result in inadequate emergency access. • Substantially increase cumulative hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). In addition, the Draft EIR concludes that with implementation of mitigation, the proposed project would result in a less-than-significant impact related to the following: • Conflict with a program, plan, ordinance, or policy addressing the circulation system during operations. • Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).	Preservation of the Rosa Properties consistent with Mitigation Measure 4.2-1 would not result in the development of any urban uses on-site, as lands would be restricted for conservation under the HCP, and would be required to remain in their existing state (i.e., as either open space or agricultural lands) in perpetuity. Thus, preservation of the Rosa Properties would not result in any increased vehicle activity as compared to existing allowed use. In addition, as discussed above, TNBC would implement NBHCP preservation and management requirements set forth in Chapters VI and V of the NBHCP to ensure all applicable NBHCP requirements are met. Based on the above, new significant impacts or substantially more severe significant impacts would not occur as a result of preservation of the Rosa Properties beyond the impacts that were previously evaluated in the Draft EIR. Therefore, the proposed clarifications and amplifications to the project description are consistent with the analysis and conclusions of the Draft EIR.
Chapter 4.13 – Tribal Cultural Resources	
The Draft EIR concludes the proposed project would result in a less-than-significant impact related to the following:	Preservation of the Rosa Properties consistent with Mitigation Measure 4.2-1 would not result in the development of any urban uses on-site, as lands

Table 1
Analysis of Environmental Impacts Associated with the Proposed Changes

Draft EIR Conclusion	Evaluation of Proposed Changes
• Cause a cumulative loss of tribal cultural resources. In addition, the Draft EIR concludes that with implementation of mitigation, the proposed project would result in a less-than-significant impact related to the following: • Cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074.	would be restricted for conservation under the HCP, and would be required to remain in their existing state (i.e., as either open space or agricultural lands) in perpetuity. Thus, preservation of the Rosa Properties would not result in any increased ground disturbance as compared to existing allowed use. In addition, as discussed above, TNBC would implement NBHCP preservation and management requirements set forth in Chapters VI and V of the NBHCP to ensure all applicable NBHCP requirements are met. Based on the above, new significant impacts or substantially more severe significant impacts would not occur as a result of preservation of the Rosa Properties beyond the impacts that were previously evaluated in the Draft EIR. Therefore, the proposed clarifications and amplifications to the project description are consistent with the analysis and conclusions of the Draft EIR.
Chapter 5 – Effects Not Found to be Significant	
The Draft EIR concludes the proposed project would not result in a significant effect related to the following environmental issue areas: • Forestry Resources ○ Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code [PRC] Section 12220[g]), timberland (as defined by PRC Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g]); or ○ Result in the loss of forest land or conversion of forest land to non-forest use. • Geology and Soils ○ Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. • Hazards and Hazardous Materials ○ Impair implementation of or physically interfere with an	Preservation of the Rosa Properties consistent with Mitigation Measure 4.2-1 would not result in the development of any urban uses on-site, as lands would be restricted for conservation under the HCP, and would be required to remain in their existing state (i.e., as either open space or agricultural lands) in perpetuity. Thus, preservation of the Rosa Properties would not result in any increased tree removal, ground disturbance, impairment of an adopted emergency response plan or emergency evacuation plan, loss of mineral resources, displacement of people or housing, or wildfire risk as compared to existing allowed use. In addition, as discussed above, TNBC would implement NBHCP preservation and management requirements set forth in Chapters VI and V of the NBHCP to ensure all applicable NBHCP requirements are met. Based on the above, new significant impacts or substantially more severe significant impacts would not occur as a result of preservation of the Rosa Properties beyond the impacts that were previously evaluated in the Draft EIR. Therefore, the proposed clarifications and amplifications to the project description are consistent with the analysis and conclusions of the Draft EIR.

Table 1
Analysis of Environmental Impacts Associated with the Proposed Changes

Draft EIR Conclusion	Evaluation of Proposed Changes
adopted emergency response plan or emergency evacuation plan; and ○ Expose people or structures, either directly or indirectly, to the risk of loss, injury or death involving wildland fires. • Mineral Resources ○ Result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state; or ○ Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. • Population and Housing ○ Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. • Wildfire ○ Substantially impair an adopted emergency response plan or emergency evacuation plan; ○ Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire; ○ Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or ○ Expose people or structures to significant risks, including downslope or downstream flooding, or landslides, as a result of the runoff, post-fire slope instability, or drainage changes.	

As demonstrated in Table 1, the proposed changes are consistent with the analyses and conclusions of the Draft EIR and revisions to the Draft EIR and/or Final EIR are not required. In addition, the proposed changes do not constitute:

- Information that shows a new significant impact;
- Information that shows an increase in the severity of an impact (unless mitigation measures are identified to reduce it to acceptable levels);
- Information that identifies a feasible new alternative or mitigation measure considerably different from other analyzed alternatives or mitigation measures that would clearly lessen project impacts and the applicant declines to implement the measure; or
- Information that demonstrates that the Draft EIR was fundamentally flawed, basically inadequate, and conclusory in nature, thus, precluding meaningful public review and comment.

Rather, any new information clarifies or amplifies the analyses in the Draft EIR. In fact, as discussed above, preservation of the Rosa Properties would ensure successful implementation of the off-site agricultural/open space requirements included within section b of Mitigation Measure 4.2-1 of the Draft EIR. Based on the above, recirculation of the Draft EIR is not warranted.

If you have any questions regarding the contents of this document, please do not hesitate to contact me at (916) 372-6100, or via email at rods@raneymanagement.com.

Thank you,

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