City of Galt
Community Development Department

Fairway Oaks and Island Annexation Project

Initial Study/Mitigated Negative Declaration

May 2020

Prepared by

RANEY PLANNING & MANAGEMENT, INC. 20 years
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INITIAL STUDY
MAY 2020

BACKGROUND

1. Project Title: Fairway Oaks and Island Annexation Project

2. Lead Agency Name and Address:
City of Galt
Community Development Department
495 Industrial Drive
Galt, CA 95632

3. Contact Person and Phone Number:
Chris Erias
Community Development Director
(209) 366-7230

4. Project Location:
Fairway Oaks Vesting Tentative Map (VTM) Site:
APNs: 150-0101-019, -021, -050, -052, and -059
South of Glendale Avenue and west of State Route 99
Galt, CA 95632

Island Annexation Area:
APNs: 150-0371-005, -009, -010, -011, -014, -017, -018, -019, -020, -025;
150-0372-001, -002, -003, -004, -005, -006, -008, -009, -010, -011;
150-0333-016, -022, -023, -024, -025, -026.
Along South Lincoln Way, between Southdale Court and Ranch Road
Galt, CA 95632

5. Project Sponsor's Name and Address:
Arcadia Development Co.
P.O. Box 5368
San Jose, CA 95150
(408) 866-0322

6. Existing General Plan Designation:
Fairway Oaks VTM Site:
Low Density Residential (City of Galt)
Open Space (City of Galt)

Island Annexation Area:
Low Density Residential (Sacramento County and City of Galt)

7. Existing City of Galt Zoning Designation:
Fairway Oaks VTM Site:
Intermediate Density Single Family Planned Development (R1B)
Maximum Density Single Family (R1C)
Open Space (OS)

Island Annexation Area:
None

8. Proposed City of Galt Zoning:

Fairway Oaks VTM Site:
Maximum Density Single Family Planned Development (R1C-PD)
Open Space (OS)

Island Annexation Area:
Maximum Density Single-Family (R1C)

9. Required Approvals from Other Public Agencies:

California Department of Fish and Wildlife
Central Valley Regional Water Quality Control Board
Sacramento Local Agency Formation Commission
South Sacramento Conservation Agency
United States Army Corps of Engineers

10. Surrounding Land Uses and Setting:

The entire project site consists of approximately 90 acres located south of Glendale Avenue, west of State Route (SR) 99, northwest of Dry Creek, and east of the Creekside 2 development in the southern portion of the City of Galt. The site is currently undeveloped and covered in annual grassland. Residential and commercial land uses are located to the north of the site; residential land uses and undeveloped land are located to the west; SR 99 is located to the east; and the Dry Creek Golf Club is located to the southeast of the site.

11. Project Description Summary:

The proposed project would consist of two components: annexation of the 39.5-acre unincorporated County island, the Island Annexation Area, into the City of Galt, and a Vesting Tentative Map to subdivide the 50.5-acre Fairway Oaks VTM Site into 173 single-family residential lots, and an open space lot along the Dry Creek frontage. The proposed annexation would include prezoning of the Island Annexation Area to match the City's General Plan land use designation for the site of Low Density Residential. Annexation of the site into the City of Galt is a formal municipal reorganization action that requires approval by the Sacramento LAFCo. Development plans do not currently exist for the Island Annexation Area. The proposed development of the Fairway Oaks VTM Site would include a new internal circulation system, landscaping, and associated improvements. Approval of the VTM and a Rezone for two of the parcels would be required prior to development of the 50.5-acre Fairway Oaks VTM Site.

12. Status of Native American Consultation Pursuant to Public Resources Code Section 21080.3.1:

In compliance with Assembly Bill (AB) 52 (Public Resources Code Section 21080.3.1), a project notification letter was distributed to the chairpersons of the Wilton Rancheria and the Torres Martinez Desert Cahuilla Indian Tribe on August 29, 2019. The contacted tribes have not requested formal consultation with the City of Galt.

SOURCES

The following documents are referenced information sources used for the purposes of this Initial Study:

1. California Air Resources Board. *The 2017 Climate Change Scoping Plan Update.* January 20, 2017.
2. California Department of Conservation. *California Important Farmland Finder*. Available at: https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed January 2020.
3. California Department of Conservation. *Farmland of Local Importance*. 2016.
4. California Department of Conservation. *Fault Activity Map of California*. Available at: http://maps.conservation.ca.gov/cgs/fam/. Accessed January 2020.
5. California Department of Forestry and Fire Protection. *Sacramento County, Very High Fire Hazard Severity Zones in LRA*. July 30, 2008.
6. California Department of Resources Recycling and Recovery (CalRecycle). *Facility/Site Summary Details: Sacramento County Landfill (Kiefer) (34-AA-0001)*. Available at: https://www2.calrecycle.ca.gov/swfacilities/Directory/34-AA-0001/. Accessed January 2020.
7. California Department of Transportation. *ArcGIS: California Scenic Highways*. Available at: https://www.arcgis.com/home/webmap/viewer.html?useExisting=1&layers=f0259b1ad0fe4093a5604c9b838a486a. Accessed January 2020.
8. California Geologic Survey. *Earthquake Zones of Required Investigation.* Available at: https://maps.conservation.ca.gov/cgs/EQZApp/app/. Accessed January 2020.
9. City of Galt. *2015 Urban Water Management Plan Update*. June 2016.
10. City of Galt. *City of Galt 2030 General Plan EIR*. April 2009.
11. City of Galt. *Galt 2030 General Plan, Existing Conditions Report*. November 2005.
12. City of Galt. *Galt Municipal Code*. April 16, 2019.
13. City of Galt. *Wastewater Treatment Plant.* Available at: http://www.ci.galt.ca.us/city-departments/public-works/utilities-division/wastewater-services/wastewater-treatment-plant. Accessed January 2020.
14. County of Sacramento, City of Rancho Cordova, City of Galt, Sacramento County Water Agency, Southeast Connector Joint Powers Authority. *Final South Sacramento Habitat Conservation Plan.* February 2018.
15. County of Sacramento. *2019 SSHCP Mitigation Fees Per Acre*. Available at: https://planning.saccounty.net/PlansandProjectsIn-Progress/Pages/SSHCPPlan.aspx. Accessed December 2019.
16. County of Sacramento. *County of Sacramento General Plan, Conservation Element*. Amended September 26, 2017.
17. Department of Toxic Substances Control. *Hazardous Waste and Substances Site List (Cortese).* Available at: https://www.envirostor.dtsc.ca.gov/public/. Accessed January 13, 2020.
18. ECORP Consulting, Inc. *Biological Resources Assessment: Fairway Oaks Project and Annexation Area*. 2019.

19. Federal Emergency Management Agency. *Sacramento County, California Flood Insurance Rate Map 06067C0606J.* Effective October 20, 2016.
20. GHD. *Fairway Oaks Traffic Impact Study*. January 28, 2020.
21. Sacramento Metropolitan Air Quality Management District. *Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District*. January 31, 2020.
22. Sacramento Metropolitan Air Management District. *Guide to Air Quality Assessment in Sacramento County*. May 2017.
23. South County Transit. *Welcome to South County Transit – SCT Link*. Available at: http://www.sctlink.com/. Accessed February 2020.
24. United States Census Bureau. *QuickFacts: Galt City, California*. Available at: https://www.census.gov/quickfacts/galtcitycalifornia. Accessed January 2020.
25. United States Department of Agriculture Natural Resources Conservation Service. *Web Soil Survey*. Available at: websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx. Accessed February 2020.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

As indicated by the checklist on the following pages, the proposed project would not result in significant impacts to any of the environmental factors listed below, and mitigation would not be required.

✖ **Aesthetics**	☐ **Agriculture and Forest Resources**	☐ **Air Quality**
✖ **Biological Resources**	✖ **Cultural Resources**	☐ **Energy**
✖ **Geology and Soils**	✖ **Greenhouse Gas Emissions**	✖ **Hazards and Hazardous Materials**
✖ **Hydrology and Water Quality**	☐ **Land Use and Planning**	☐ **Mineral Resources**
✖ **Noise**	☐ **Population and Housing**	☐ **Public Services**
☐ **Recreation**	☐ **Transportation**	✖ **Tribal Cultural Resources**
☐ **Utilities and Service Systems**	☐ **Wildfire**	☐ **Mandatory Findings of Significance**

DETERMINATION

On the basis of this initial study:

☐ I find that the Proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the Proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the applicant. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the Proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature	Date
Chris Erias, Community Development Director	City of Galt
Printed Name	For

BACKGROUND AND INTRODUCTION

This Initial Study/Mitigated Negative Declaration (IS/MND) identifies and analyzes the potential environmental impacts of the Fairway Oaks and Island Annexation Project (proposed project). The information and analysis presented in this document is organized in accordance with the order of the California Environmental Quality Act (CEQA) checklist in Appendix G of the CEQA Guidelines. Where the analysis provided in this document identifies potentially significant environmental effects of the project, mitigation measures are prescribed. The mitigation measures prescribed for environmental effects described in this IS/MND would be implemented in conjunction with the project, as required by CEQA. The mitigation measures would be incorporated into the project through conditions of approval. The City would adopt findings and a Mitigation Monitoring/Reporting Program for the project in conjunction with approval of the project.

In April 2009, the City of Galt completed a comprehensive General Plan Update (GPU). An EIR was prepared for the GPU. The GPU EIR is a program EIR, prepared pursuant to Section 15168 of the CEQA Guidelines (Title 14, California Code of Regulations, Sections 15000 et seq.). The Galt GPU EIR analyzed full implementation of the Galt GPU and identified measures to mitigate the significant adverse impacts associated with the General Plan. The project site, including the Island Annexation Area and the Fairway Oaks VTM Site, is included in the City's Planning Area. The proposed project does not involve any changes to existing land use designations and, thus, the proposed project would be consistent with the General Plan. As such, development of the Fairway Oaks VTM Site and Island Annexation Area was included in the GPU EIR analysis.

Per Public Resources Code (PRC) Section 21083.3, if a development project is consistent with the local general plan and zoning, the environmental analysis should be limited to effects on the environment which are peculiar to the parcel or to the project and which were not addressed as significant effects in the prior EIR. Therefore, in accordance with PRC Section 21083.3, the analysis within this IS/MND will rely on analysis and incorporate by reference the general discussions included in the General Plan EIR, as applicable.

A previous iteration of the Fairway Oaks VTM, involving a 100-unit subdivision, and a corresponding CEQA document, was approved by the City in 2012. Subsequent to approval, the development was not built within the allotted time, and the applicant is now proposing a revised VTM incorporating two additional parcels and including the annexation of the Island Annexation Area in order to ensure access to the Fairway Oaks VTM Site and to provide for more efficient municipal service to those living in and near the County island.

The proposed project would not involve any development within the Island Annexation Area and the area would remain as is. Future development within the Island Annexation Area would be consistent with what has already been anticipated and analyzed by the City in the GPU EIR. Should property owners within the Island Annexation Area wish to further develop their properties in excess of what is currently allowed under the County of Sacramento land use regulations, such development would be required to meet the City of Galt's development standards.

It is important to note that CEQA acknowledges that the degree of specificity required in an environmental document will correspond to the degree of specificity involved in the underlying activity which is described in the environmental document (Guidelines Section 15146). For an annexation project, such as the Island Annexation Area, where direct development is not currently proposed, the degree of specificity is programmatic in nature, but an effort should be made to address the secondary effects that could reasonably be expected to follow from approval of the requested annexation and prezoning. In this case, the secondary effects that could be reasonably

expected is development of the annexation area pursuant to the existing General Plan land use designations and requested prezoning. In doing such an analysis of the secondary effects, it need not be as detailed as that for a specific construction project (15146(b)).

PROJECT DESCRIPTION

The following provides a description of the project site's current location and setting, as well as the proposed project components and the discretionary actions required for the project.

Project Location and Setting

The project site consists of two adjacent areas: the Island Annexation Area and the Fairway Oaks VTM Site. Both sites are located south of Glendale Avenue and west of SR 99, northwest of Dry Creek, and east of the Creekside 2 development in the southern portion of the City of Galt (see Figure 1). Two schools, the Galt Christian School and Fairsite Elementary School, are located approximately 250 north of the project site and 600 feet north of the project site, respectively. The Island Annexation Area and the Fairway Oaks VTM Site are located on relatively flat terrain at approximately 40 to 60 feet above sea level.

Island Annexation Area

The Island Annexation Area is currently an island of unincorporated Sacramento County land, and consists of scattered existing development, including rural residences, residential roadways, a Kingdom Hall of Jehovah's Witnesses, and grassland. The area is designated by Sacramento County and the City of Galt General Plan as Low Density Residential. Surrounding land includes residential and commercial uses to the north, residential uses, a church, and undeveloped land to the west, the Fairway Oaks VTM Site to the east, and a cemetery to the southwest. Several trees, including oaks, are present throughout the Island Annexation Area.

Fairway Oaks VTM Site

Currently, the Fairway Oaks VTM Site is vacant and undeveloped. The site has been used for cattle grazing over the past several decades, and is comprised of annual grassland within the north, central, and western portions of the site and riparian woodland along the southeast border of the site. The City of Galt 2030 General Plan designates the Fairway Oaks VTM Site as Low Density Residential. Three of the properties within the Fairway Oaks VTM Site (APNs 150-0101-019, -021, and -059) have a zoning designation of Maximum Density Single Family (R1C), and two of the parcels (APNs 150-0101-052 and -050) have a zoning designation of Intermediate Density Single Family (R1B). A portion of the Fairway Oaks VTM Site is designated Open Space (OS), associated with Dry Creek.

Surrounding land includes residential and commercial uses to the north, undeveloped lots and rural residential uses to the west, residential uses to the south, and Dry Creek and SR 99 along the southern and eastern borders, respectively. The Dry Creek Ranch Golf Course is located to the east of the site, across SR 99. At the eastern border of the site, along Dry Creek, a riparian area exists, with well-established native and planted trees present and evidence of use by campers. A dirt road runs parallel to the eastern site boundary and narrows to a trail that connects the south end of the Fairway Oaks VTM Site to open space. A row of trees, including oak trees, is present along the southeastern site boundary, adjacent to Dry Creek. In addition, isolated patches of trees exist scattered throughout the site and along the project's borders adjacent to existing residences.

Figure 1
Regional Project Location

Project Components

The proposed project would consist of two separate components: annexation of the Island Annexation Area and development of the Fairway Oaks VTM Site (Figure 2). The Island Annexation Area and the Fairway Oaks VTM are discussed separately in further detail below.

Island Annexation Area

The proposed project would include a request for annexation of a 39.5-acre area of land, referred to as the Island Annexation Area, into the City of Galt. The proposed annexation would include prezoning of the Island Annexation Area to match the City's existing General Plan land use designation for the site of Low Density Residential. Development plans do not exist for the Island Annexation Area at this time. Annexation of the site into the City of Galt is a formal municipal reorganization action that requires approval by the Sacramento LAFCo. For this annexation to occur, first, the City would need to approve an annexation resolution for the project, which would subsequently be submitted to the Sacramento LAFCo for approval as a responsible agency. A Property Tax Exchange Agreement must be executed between the County, including any affected special districts, and the City prior to consideration of the Reorganization request by LAFCo.

The annexation would formally transfer all local governmental powers and municipal services pertaining to the project site from the County of Sacramento to the City of Galt. The proposed annexation would require detachment from the Sloughhouse Resource Conservation District (RCD), the Groundwater Sustainability Agency for the Cosumnes Subbasin. Upon annexation, the City would be responsible for providing water service, sewer service, police protection, library and general government services, along with maintaining water and sewer mains, the on-site storm drainage system, and local parks and recreation resources. The Cosumnes Community Services District currently provides and would continue to provide fire protection services to the area. Although City water and sewer services would be made available to the properties within the Island Annexation Area, existing on-site water or wastewater systems could be maintained at the discretion of the land owner. However, should property owners within the Island Annexation Area wish to further develop their properties in excess of what is currently allowed under the County of Sacramento land use regulations, such development would be required to meet the City of Galt's development standards. Such standards include the requirement that new development be connected to City water and sewer services. The detachment of the project site from the Sloughhouse RCD would require approval from the LAFCo.

The Low Density Residential land use designation allows zero to six residential units per acre. Based on the maximum allowable buildout of the site, the residential buildout capacity of the Island Annexation Area that could ultimately result from the proposed annexation would be up to 237 single-family residential units (39.5 acres x 6.0 units per acre). However, as noted in the General Plan, the average density within the Low Density Residential land use designation was assumed to be four units per acre for the purpose of the General Plan EIR analysis. Based on the average density assumed in the EIR, buildout of the Island Annexation Area is expected to include approximately 158 single-family residential units. For the purpose of this analysis, consistent with the General Plan EIR, future buildout of the Island Annexation Area is assumed to occur at the average residential density.

Figure 2
Approximate Project Site Boundaries Map

Fairway Oaks Vesting Tentative Map Site

Within the 50.5-acre Fairway Oaks VTM Site, the proposed project would include construction of 173 single-family residences and establishment of an 11-acre open space area (see Figure 3). Construction of the residential neighborhood would include a paved circulation system and associated improvements. The residential lots would range from 5,500 sf to 15,273 sf. Each unit would have a private driveway. Dry Creek and the surrounding vegetation would be preserved within the open space area. The open space area would include a park, bike trail, and oak grove preserve, which would remain as a conservation area.

Access and Circulation

Vehicle access to the Fairway Oaks VTM Site would be provided at four points, with the main entrance at Ranch Road. Ranch Road would be a 60-foot-wide access road with an entry feature to distinguish the entrance into the neighborhood. Consistent with the project theme, the entry feature would incorporate stacked stone buttresses, stucco facia, and neo-classic lettering denoting entrance into the subdivision. The three additional access roads would be located along the exterior of the development and would include entry from Glendale Avenue (via Lillian Lane), Chase Drive, and Cornell Road. Internal streets would be constructed to circulate the site and provide access to all lots. The internal streets would be constructed to be the proper widths to accommodate two-way traffic and emergency vehicle access.

The proposed project would include improvements to Cornell Road, including reconditioning, repaving, and construction of a dedicated six-foot-wide pedestrian walkway and bike path on the north side of the pavement, separated from vehicular traffic. The improvements would maintain the rural character of Cornell Road by conserving the mature tree canopy and maintaining the relatively narrow drive lane that is intended to slow traffic.

Pedestrian access would be provided along three of the four access points. A sidewalk would be constructed on at least one side of all internal streets for circulation throughout the development. Additionally, a 10-foot-wide asphalt bicycle and pedestrian pathway would be provided from Chase Drive in the southern portion of the site, within the open space area along Dry Creek along the eastern border of the site, and west to connect to Lillian Lane.

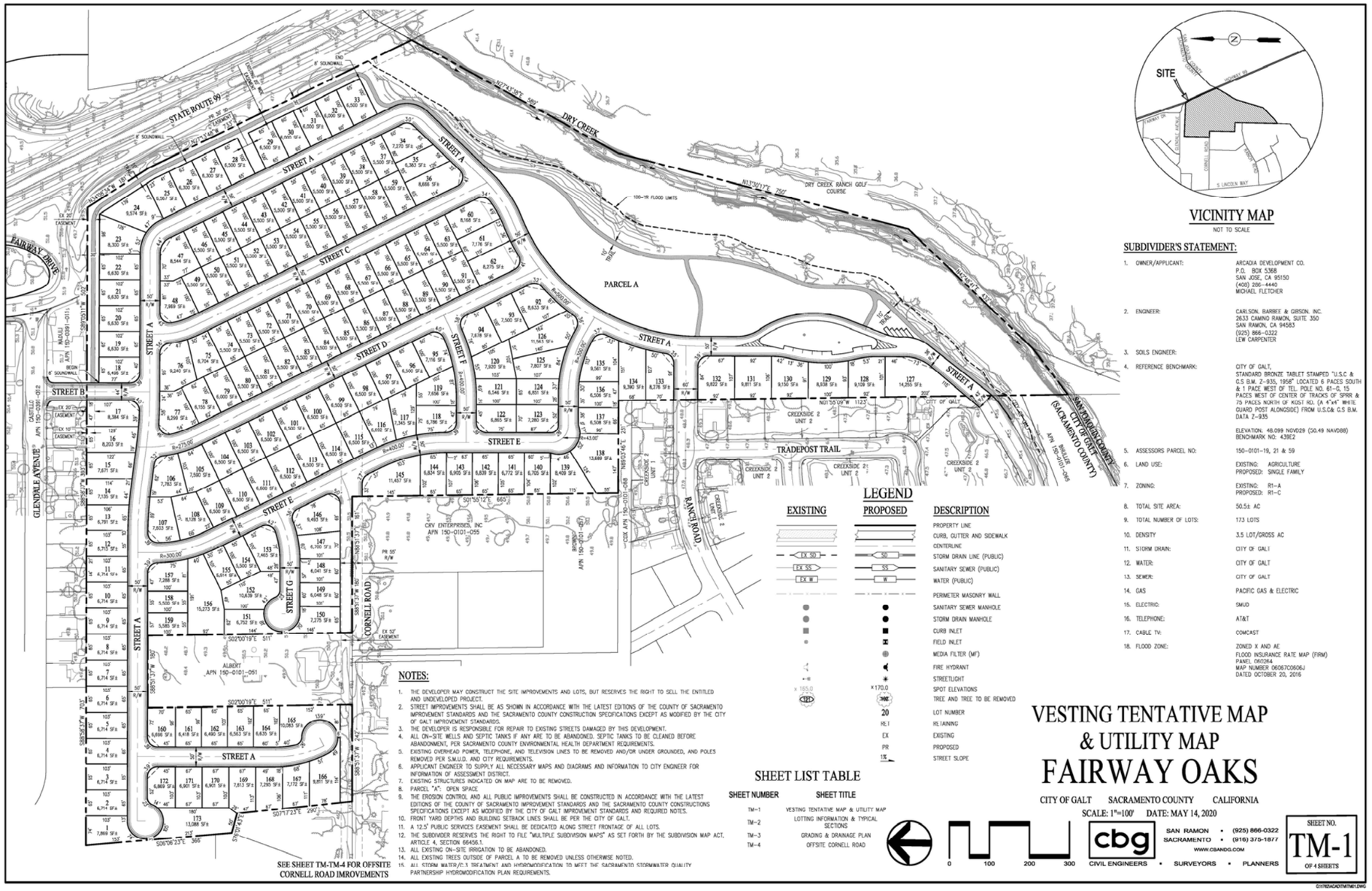
Utilities

Infrastructure requirements for the proposed project include water supply, a sanitary sewer system, stormwater drainage, street lights, fire hydrants, and various other utility components, such as power poles, manholes, water meters, and catch basins with bicycle-safe grates. The proposed water, wastewater, stormwater, and electricity and natural gas improvements are discussed in further detail below.

Water

Potable water would be provided to the site by the City of Galt Public Works Department. The proposed project includes construction of eight-inch water lines within each internal street, which would connect to an existing 12-inch water line either within Glendale Avenue or along the project site perimeter. Pipes would be arranged in a typical grid pattern to ensure adequate flow rates to all portions of the site for both domestic use and fire protection. Several new fire hydrants would be installed throughout the neighborhood as part of the proposed project.

Figure 3
Tentative Subdivision Map



Wastewater

Like water, wastewater services would be provided by the City of Galt Public Works Department, and treated at the City's wastewater treatment plant. Wastewater from the proposed project would be conveyed via a system of new eight- to 12-inch sanitary sewer lines, which would connect to an existing 10-inch sewer main within Ranch Road. The proposed project would also include installation of a new sewer main in Cornell Road and Bernal Road (in Cornell Drive from the project site to Bernal Road), connecting to the existing line on the east side of Bernal Road to the south.

Stormwater

Stormwater draining off of roofs, parking areas, and drive aisles within the Fairway Oaks VTM Site would be captured by curb inlets and routed, by way of new underground drain pipes, to an existing network of storm drains. The existing drainage main is located along the northeast property line, adjacent to SR 99. The project would be required to comply with the current Sacramento County C.3 permit.

Electricity and Natural Gas

Electrical utilities would be provided by SMUD, while natural gas utilities would be provided by PG&E, by way of connections to existing infrastructure located within the immediate project vicinity. Any existing overhead electricity, telephone, or television lines on the project site would be removed or undergrounded.

Rezone

The existing R1C zoned area within the Fairway Oaks VTM Site, as well as the two R1B parcels north of Cornell Road would be rezoned to R1C-PD (see Figure 4). The R1C district is intended for single-family detached homes and secondary residential units, and provides a higher density single-family residential environment compared to the R1B district. The R1C district is characterized by small residential lots designed to promote the development of single-family dwellings at a higher suburban density with cohesive neighborhoods and easy access to urban facilities. The proposed project would have a gross density of 3.5 units per acre, which would comply with the R1C allowable residential density range of zero to six dwelling units per acre. The R1C zoning district is consistent with the Low-Density Residential land use designation of the General Plan.

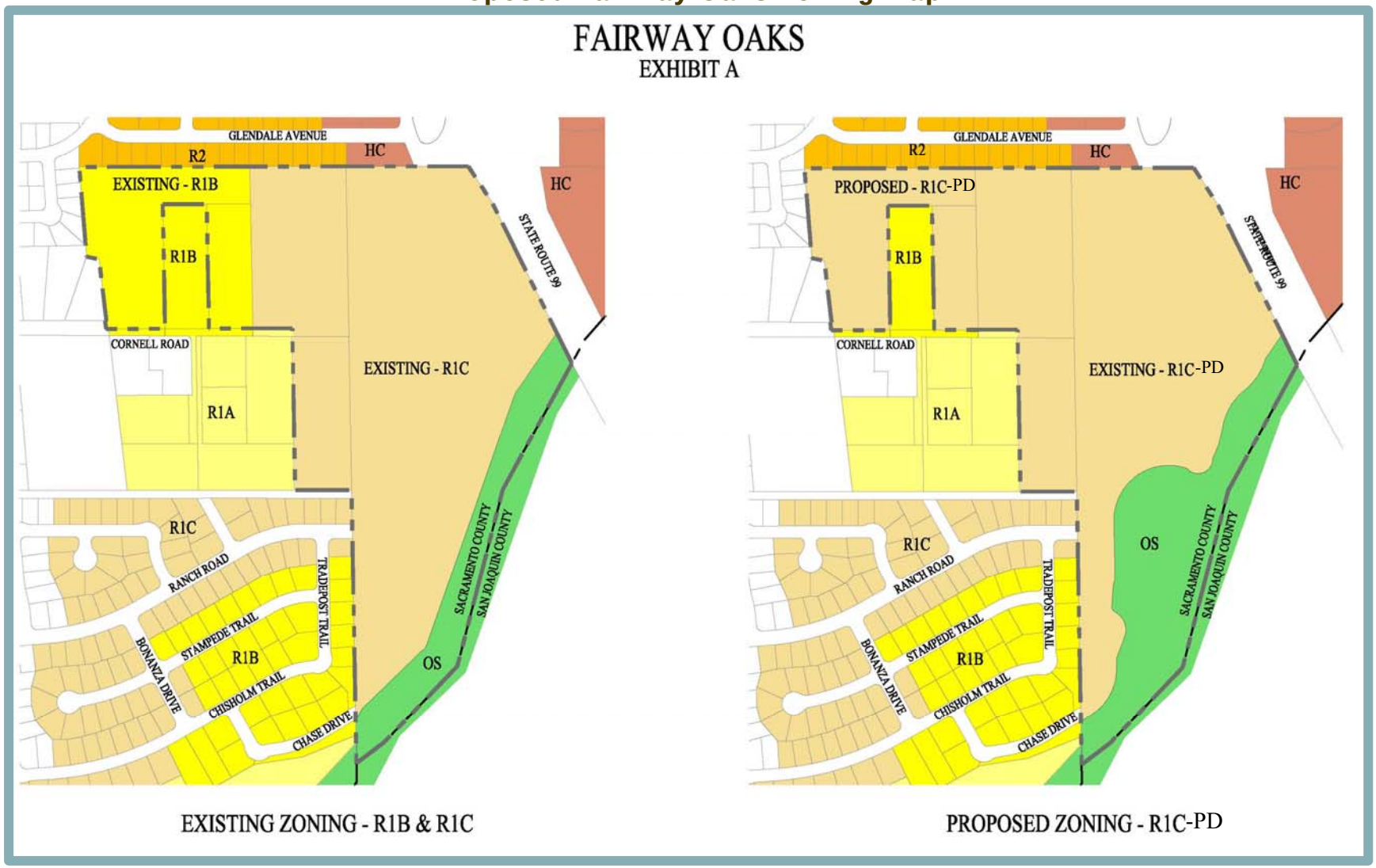
Discretionary Actions

The proposed project would require the following approval from the City of Galt:

- Approval of this Initial Study/Mitigated Negative Declaration;
- Adoption of a Mitigation Monitoring and Reporting Plan (MMRP);
- Annexation and prezoning of the Island Annexation Area;
- Approval of a Rezone of APNs 150-0101-050 and 150-0101-052 from R1B to R1C-PD and APNs 150-0101-019, -021, and -059 from R1C to R1C-PD; and
- Approval of the VTM to subdivide the 50.5-acre Fairway Oaks site into 173 single-family residential lots and an open space lot.

As a responsible agency, the Sacramento LAFCo would be required to approve the proposed annexation and associated requirements.

Figure 4
Proposed Fairway Oaks Zoning Map



ENVIRONMENTAL CHECKLIST

The following checklist contains the environmental checklist form presented in Appendix G of the CEQA Guidelines. The checklist form is used to describe the impacts of the proposed project. A discussion follows each environmental issue identified in the checklist. For this checklist, the following designations are used:

Potentially Significant Impact: An impact that could be significant, and for which no mitigation has been identified. If any potentially significant impacts are identified, an EIR must be prepared.

Less Than Significant with Mitigation Incorporated: An impact that requires mitigation to reduce the impact to a less-than-significant level.

Less-Than-Significant Impact: Any impact that would not be considered significant under CEQA relative to existing standards.

No Impact: The project would not have any impact.

I. AESTHETICS. *Would the project:*	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?	☐	☐	✖	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	☐	☐	☐	✖
c. In non-urbanized areas, 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 publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	✖	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	✖	☐	☐

Discussion

The proposed project does not involve any development within the Island Annexation Area. Because the Island Annexation Area would remain as is, impacts related to aesthetics associated with such would not occur. Although future development of the Island Annexation Area could result in approximately 158 single-family residences, which could affect aesthetics in the area, buildout would be consistent with the General Plan land use designation for the site. As such, associated impacts have been anticipated by the City and analyzed in the General Plan EIR. Per PRC Section 21083.3, if a development project is consistent with the local general plan and zoning, the environmental analysis should be limited to effects on the environment which are peculiar to the parcel or to the project and which were not addressed as significant effects in the prior EIR.

According to the General Plan EIR, impacts related to aesthetics were determined to remain significant and unavoidable as a result of buildout of the General Plan, including the Island Annexation Area. The City Council adopted a Statement of Overriding Considerations for the impacts resulting from adoption of the General Plan and associated EIR. Because the Island Annexation Area would be consistent with the General Plan land use designation, any potential impacts associated with future development of the site related to aesthetics have been previously anticipated by the City. In addition, the project would not include any effects on the environment that would be considered peculiar to the area. Accordingly, further analysis of aesthetics associated with future development of the Island Annexation Area is not necessary. Therefore, the following discussion focuses only on aesthetic impacts resulting from development of the Fairway Oaks VTM Site.

a. Examples of typical scenic vistas include mountain ranges, ridgelines, or bodies of water as viewed from a highway, public space, or other area designated for the express purpose of viewing and sightseeing. The Galt General Plan does not designate any scenic vistas within the City's Planning Area. Furthermore, mountain ranges, ridgelines, or bodies of water are not located in the vicinity of the Fairway Oaks VTM Site and would not be affected by development of the site. Therefore, the proposed project would not substantially affect a scenic vista and the project would have a ***less-than-significant*** impact.

b. According to the California Scenic Highway Mapping System, the project site is not located within the vicinity of an officially designated State Scenic Highway.[1] As such, implementation of the proposed project would not result in visual impacts to a designated State scenic highway, and ***no impact*** would occur.

c. The Fairway Oaks VTM Site is currently undeveloped and consists of annual grassland within the northern, central, and western portions of the site. The visual quality of the site is characterized by natural, open lands, bordered by clusters of oak trees, and Dry Creek to the southeast. The natural quality of the site defines the southern approach into Galt, while buffering the residential development north and west of the site. The southeastern portion of the Fairway Oaks VTM Site is bordered by Dry Creek, which flows north to south. Several native oak trees exist along the southern and eastern portions of the site associated with Dry Creek. Dry Creek and the surrounding vegetation that define the visual quality from the entrance of Galt, would be preserved as an 11-acre open space zone that would include a park, bike trail, and oak grove preserve, which would remain as a conservation area.

   The Galt 2030 General Plan EIR states that new development along the periphery of the existing City boundary would substantially degrade the existing visual character or quality of the site and its surroundings through the introduction of developed uses within areas currently used for open space or agricultural activities. However, the Fairway Oaks VTM Site has been anticipated for residential development in the General Plan and associated EIR. The proposed project is consistent with the General Plan land use designations for the site and the project would be consistent with the surrounding existing land uses. Therefore, the impacts of buildout of the Fairway Oaks VTM Site have been previously addressed in the General Plan EIR.

   Because the proposed project is consistent with the 2030 General Plan and includes conservation of the majority of the trees and riparian areas of the site as an open space park, implementation of the proposed project would not substantially degrade the existing visual character or quality of the site or its surroundings, and a ***less-than-significant*** impact would occur.

d. The proposed project includes the development of 173 single-family housing units, a park, and a Class I bike trail within the Fairway Oaks VTM Site, which would generate new sources of light and glare where none currently exist. Anticipated new sources of light include outdoor street lighting, residential lighting, glare from windows, and light associated with vehicles entering and exiting the site. However, the proposed project would be required to implement all relevant General Plan goals and policies designed to minimize impacts resulting from a new source of substantial light or glare. Applicable City policies include, but are not limited to, the following:

   - Policy CC-1.11: Outdoor Lighting. The City shall ensure that future development includes provisions for the design of outdoor light fixtures to be directed/shielded downward and screened to avoid nighttime lighting spillover effects on adjacent land uses and nighttime sky conditions.
   - Policy CC-1.12 Reflective Materials. The City shall consider a range of building materials to ensure that future building design reduces the potential impacts of daytime glare.

[1] California Department of Transportation. *ArcGIS: California Scenic Highways*. Available at: https://www.arcgis.com/home/webmap/viewer.html?useExisting=1&layers=f0259b1ad0fe4093a5604c9b838a486a. Accessed January 2020.

The General Plan EIR concluded that new development along the periphery of the City boundary would result in new sources of light and glare within areas currently used for a variety of open space and agricultural activities. Because the proposed project would be consistent with the General Plan land use designations, impacts resulting from the proposed developed have been previously analyzed in the General Plan EIR. However, because the type and amount of lighting are not currently specified, the possibility exists for a ***potentially significant*** impact to result.

Mitigation Measure(s)

Implementation of the following mitigation measure would reduce the above potential impact to a *less-than-significant* level.

Island Annexation Area and Fairway Oaks VTM Site

I-1. *In conjunction with the submittal of Improvement Plans, the applicant shall submit a lighting plan for the review and approval of the Community Development Department. The lighting plan shall indicate the provision of shielding for all light fixtures to avoid nighttime lighting spillover effects on adjacent land uses and nighttime sky conditions. In addition, the lighting plan shall address limiting light trespass and glare through the use of shielding and directional lighting methods including, but not limited to, fixture location, design, and height. The applicant shall implement the approved lighting plan in conjunction with development of the proposed project, for the review and approval of the City of Galt Community Development Department.*

II. AGRICULTURE AND FOREST RESOURCES. *Would the project:*	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	✖	☐
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	✖	☐
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	✖
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	✖
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	✖	☐

Discussion

a,b,e. According to the California Department of Conservation Important Farmland Finder, the entire project site includes approximately 38.6 percent of Urban and Built-up Land, 0.6 acres of Grazing Land, 37.0 acres of Farmland of Local Importance, and 22.4 acres of Other Land.[2] Potential impacts related to the conversion or loss of farmland are discussed separately for the Island Annexation Area and the Fairway Oaks VTM Site below. It should be noted that a discussion of the LAFCo policies related to the protection of agricultural resources is presented in Section XI, Land Use and Planning, of this IS/MND.

Island Annexation Area

The Island Annexation Area consists of low-density residential uses, associated roadways, and vacant land. In particular, the Island Annexation Area contains approximately 33 acres of Urban and Built-up Land and 6.5 acres of Other Land. Agricultural activities do not occur on-site. The Island Annexation Area is currently designated and zoned as Low Density Residential by the County of Sacramento, and designated by the City's General Plan as Low Density Residential. Implementation of the proposed project would result in annexation of the Island Annexation Area into the City of Galt, as well as prezoning of the site to match the City's existing General Plan land use designation for the site. Any future development within the Island Annexation Area would be consistent with the land use designation for the site, and designated Farmland does not exist on the site. Thus, future development within the Island Annexation Area would not result in the conversion of Farmland, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.

Sacramento LAFCo is required to make findings regarding five tests of "prime agricultural land" as defined by Government Code §56064. LAFCo has specific qualifications to help

[2] California Department of Conservation. *California Important Farmland Finder*. Available at: https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed January 2020.

define prime agricultural lands. Prime agricultural land means an area of land, whether a single parcel or contiguous parcels, that has not been developed for a use other than an agricultural use and that meets any of the qualifications outlined below. Table 1 compares the characteristics of the Island Annexation Area to the six qualifications outlined by LAFCo.

Approval by the Sacramento LAFCo requires special provisions related to Williamson Act territory to be met; however, land within the Island Annexation Area is not under a Williamson Act contract. Therefore, the Sacramento LAFCo goals and provisions related to Williamson Act Territory would not apply to the proposed project.

Approval of the proposed annexation of the unincorporated island by the Sacramento LAFCo requires the statutory goals related to the development of logical local boundaries, the preservation of prime agricultural land and open space, and Williamson Act contracts to be met. As discussed above, the project site is not located on a site that contains Prime Farmland and the proposed project would not conflict with the agricultural preservation goals and policies of LAFCo. It should be noted that the Galt General Plan does not identify Farmland resources within the project area, and the Island Annexation Area is not designated or zoned for Farmland uses. Considering the Island Annexation Area is not under a Williamson Act contract, the Sacramento LAFCo goals and provisions related to Williamson Act Territory would not apply. Therefore, the proposed project would result in a less-than-significant impact related to compliance with LAFCo's policies associated with conversion of agricultural lands to urban uses.

Fairway Oaks VTM Site

The Fairway Oaks VTM Site contains approximately three acres of Urban and Built-up Land, 0.6 acres of Grazing Land, 35.6 acres of Farmland of Local Importance, and 11.3 acres of Other Land. As such, the development of the site with residential uses would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Furthermore, the Galt General Plan does not identify farmland resources within the project area, and the Fairway Oaks VTM Site is not designated for farmland uses by the Galt General Plan.

Due to the existing California Department of Conservation designations of the site, implementation of the proposed project would convert land designated as Grazing Land and Farmland of Local Importance to non-agricultural uses. Similar to the discussion related to the Island Annexation Area above, development of the Fairway Oaks VTM Site for non-agricultural uses has been previously analyzed in the General Plan EIR. Because the conversion of Farmland to non-agricultural uses at the Fairway Oaks VTM Site was anticipated in the General Plan and analyzed in the General Plan EIR, the project's impact would be less than significant.

Conclusion

Based on the above, because the site is not designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, or under a Williamson Act contract, the proposed project would have a ***less-than-significant*** impact related to the conversion of such lands to non-agricultural uses.

Table 1
Sacramento LAFCo "Prime Agricultural Land" Comparison

Criteria	Discussion
(a) Land that qualifies for rating as Class I or Class II in the Soil Conservation Service land use capability classification.	All soils within the Island Annexation Area are designated Class III. Class III soils have severe limitations that restrict the choice of plants or require special conservation practices. As such, the on-site soils do not meet criteria (a).
(b) Land that qualifies for rating 80 through 100 Storie Index Rating.	The majority of on-site soils (83 percent) have a Storie Index Rating of Grade 4 (21 to 40). Soils with a Storie Index Rating ranging from 21 to 40 are severely limited and require special management. The remaining 17 percent of soils have a Store Index Rating of Grade 2 (61 to 80). As such, the on-site soils do not meet criteria (b).
(c) Land that supports livestock used for the production of food and fiber and that has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the United States Department of Agriculture in the National Handbook on Range and Related Grazing Lands, July 1967, developed pursuant to Public Law 46, December 1935.	Grazing operations do not occur on the Island Annexation Area and livestock have not been raised on the project site. As such, the land does not meet criteria (c).
(d) Land planted with fruit or nut-bearing trees, vines, bushes, or crops that have a nonbearing period of less than five years and that will return during the commercial bearing period on an annual bases from the production of unprocessed agricultural plant production not less than four hundred dollars ($400) per acre.	Fruit or nut-bearing trees, vines, bushes, or crops have not been grown on the Island Annexation Area within the past five years. As such, the land does not meet criteria (d).
(e) Land that has returned from the production of unprocessed agricultural plant products an annual gross value of not less than four hundred dollars ($400) per acre for three of the previous five calendar years.	The Island Annexation Area is characterized by low-density, rural residential development and associated roadways. Therefore, the site does not include the production of unprocessed agricultural plant products. As such, the land does not meet criteria (e).
(f) Land which is used to maintain livestock for commercial purposes.	As noted under question (c), the Island Annexation Area is not used to maintain livestock for commercial purposes. As such, the land does not meet criteria (f).

Source: Sacramento Local Agency Formation Commission. Policy, Standards and Procedures Manual. September 2007.

c,d. The project site is not considered forest land (as defined in Public Resources Code section 12220[g]), timberland (as defined by Public Resources Code section 4526), and is not zoned Timberland Production (as defined by Government Code section 51104[g]). Therefore, the proposed project would have ***no impact*** with regard to conversion of forest land or any potential conflict with forest land, timberland, or Timberland Production zoning.

III. AIR QUALITY. *Would the project:*	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	✖	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	✖	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	✖	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	✖	☐

Discussion

The proposed project does not involve any development within the Island Annexation Area. Because the Island Annexation Area would remain as is, impacts related to air quality associated with such would not occur. Although future development of the Island Annexation Area could result in approximately 158 single-family residences, which could affect air quality, buildout would be consistent with the General Plan land use designation for the site. Because potential future development within the Island Annexation Area would be required to occur in compliance with the existing General Plan land use designation, any potential future impacts resulting from buildout of the Island Annexation Area have been previously anticipated and the proposed annexation would not result in any new or more severe impacts from what has been previously anticipated. Consequently, the a less-than-significant impact related to air quality would occur from annexation of the Island Annexation Area. Therefore, the following discussion focuses only on air quality impacts resulting from development of the Fairway Oaks VTM Site.

a,b. The City of Galt is located in the Sacramento Valley Air Basin (SVAB), which is under the jurisdiction of the Sacramento Metropolitan Air Quality Management District (SMAQMD). Federal and State ambient air quality standards (AAQS) have been established for six common air pollutants, known as criteria pollutants, due to the potential for pollutants to be detrimental to human health and the environment. The criteria pollutants include particulate matter (PM), ground-level ozone, carbon monoxide (CO), sulfur oxides, nitrogen oxides (NO_X), and lead. At the federal level, Sacramento County is designated as severe nonattainment for the 8-hour ozone AAQS, nonattainment for the 24-hour $PM_{2.5}$ AAQS, and attainment or unclassified for all other criteria pollutant AAQS. At the State level, the area is designated as a serious nonattainment area for the 1-hour ozone AAQS, nonattainment for the 8-hour ozone AAQS, nonattainment for the PM_{10} and $PM_{2.5}$ AAQS, and attainment or unclassified for all other State AAQS.

Due to the nonattainment designations, SMAQMD, along with the other air districts in the SVAB region, is required to develop plans to attain the federal and State AAQS for ozone and particulate matter. The attainment plans currently in effect for the SVAB are the 2013 Revisions to the Sacramento Regional 8-Hour Ozone Attainment and Reasonable Further Progress Plan (2013 Ozone Attainment Plan), $PM_{2.5}$ Implementation/Maintenance Plan and Re-designation Request for Sacramento $PM_{2.5}$ Nonattainment Area ($PM_{2.5}$ Implementation/Maintenance Plan), and the 1991 Air Quality Attainment Plan (AQAP), including triennial reports. The air quality plans include emissions inventories to measure the sources of air pollutants, to evaluate how well different control measures have worked,

and show how air pollution would be reduced. In addition, the plans include the estimated future levels of pollution to ensure that the area would meet air quality goals.

The aforementioned air quality plans contain mobile source controls, stationary source controls, and transportation control measures to be implemented in the region to attain the State and federal AAQS within the SVAB. Adopted SMAQMD rules and regulations, as well as the thresholds of significance, have been developed with the intent to ensure continued attainment of AAQS, or to work towards attainment of AAQS for which the area is currently designated nonattainment, consistent with applicable air quality plans.[3] The SMAQMD's established significance thresholds associated with development projects for emissions of the ozone precursors reactive organic gases (ROG) and NO_X, as well as for PM_{10} and $PM_{2.5}$, expressed in pounds per day (lbs/day) and tons per year (tons/yr), are listed in **Error! Reference source not found.**. By exceeding the SMAQMD's mass emission thresholds for ROG, NO_X, PM_{10}, or $PM_{2.5}$, a project would be considered to conflict with or obstruct implementation of the SMAQMD's air quality planning efforts.

Table 2
SMAQMD Thresholds of Significance

Pollutant	Construction Thresholds	Operational Thresholds
ROG	N/A	65 lbs/day
NO_X	85 lbs/day	65 lbs/day
PM_{10}	80 lbs/day 14.6 tons/yr	80 lbs/day 14.6 tons/yr
$PM_{2.5}$	82 lbs/day 15 tons/yr	82 lbs/day 15 tons/yr

Source: SMAQMD, CEQA Guidelines, May 2017.

The project's construction and operational emissions were quantified using the California Emissions Estimator Model (CalEEMod) software version 2016.3.2 - a Statewide model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify air quality emissions, including GHG emissions, from land use projects. The model applies inherent default values for various land uses, including construction data, vehicle mix, trip length, average speed, etc. Where project-specific information is available, such information should be applied in the model. According to applicant-provided information and inherent project and/or site features, the project's modeling assumed the following:

- Construction was conservatively assumed to commence in June of 2020;
- Construction would occur over an approximately five-year period;
- The proposed single-family residences would result in a trip generation rate of 9.79 daily vehicle trips per dwelling unit;
- Only natural gas hearths would be installed in each unit;
- The project would improve the local pedestrian network connectivity; and
- The project would comply with the required 2019 California Building Standards Code (CBSC), including generation of 100 percent of the project's electricity demand on-site from renewable sources.

[3] Sacramento Metropolitan Air Management District. *Guide to Air Quality Assessment in Sacramento County*. May 2017.

It should be noted that the CalEEMod analysis was performed for an earlier submittal of the project that included 169 units rather than the currently proposed 173 units. However, the increase of four units would not modify the conclusions of the analysis presented below.

The project's estimated emissions associated with construction and operations are presented and discussed in further detail below. A discussion of the project's contribution to cumulative air quality conditions is provided below as well. All CalEEMod results are included in Appendix A of this IS/MND.

Construction Emissions

According to the CalEEMod results, the buildout of the Fairway Oaks VTM would result in maximum unmitigated construction criteria air pollutant emissions as shown in Table 3. As shown in the table, the project's construction emissions would be below the applicable SMAQMD thresholds of significance for NO_X, ROG, PM_{10}, and $PM_{2.5}$. In addition, development within the project site would be required to comply with the SMAQMD Basic Construction Emission Control Practices, which would help to further reduce emissions beyond the estimates shown in the table below. Thus, in accordance with SMAQMD guidance, the Fairway Oaks VTM would be considered to have a less-than-significant impact on air quality during construction.

Table 3
Maximum Unmitigated Construction Emissions

Pollutant	Fairway Oaks VTM Emissions	Threshold of Significance	Exceeds Threshold?
ROG	5.93 lbs/day	N/A	**N/A**
NO_X	50.25 lbs/day	85 lbs/day	**NO**
PM_{10}	20.40 lbs/day 1.01 tons/yr	80 lbs/day 14.6 tons/yr	**NO**
$PM_{2.5}$	11.99 lbs/day 0.66 tons/yr	82 lbs/day 15 tons/yr	**NO**

Source: CalEEMod, January 2020 (see Appendix A).

Operational Emissions

According to the CalEEMod results, the Fairway Oaks VTM Site would result in maximum unmitigated operational criteria air pollutant emissions as shown in Table 4. As shown in the table, the project's operational emissions would be below the applicable thresholds of significance. As such, the Fairway Oaks VTM would not result in a significant air quality impact during operations.

Table 4
Maximum Unmitigated Operational Emissions

Pollutant	Fairway Oaks VTM Emissions	Threshold of Significance	Exceeds Threshold?
ROG	10.47 lbs/day	65 lbs/day	**NO**
NO_X	8.79 lbs/day	65 lbs/day	**NO**
PM_{10}	6.22 lbs/day 1.06 tons/yr	80 lbs/day 14.6 tons/yr	**NO**
$PM_{2.5}$	1.81 lbs/day 0.31 tons/yr	82 lbs/day 15 tons/yr	**NO**

Source: CalEEMod, January 2020 (see Appendix A).

In addition, it should be noted that the emissions presented below do not include the mitigation measures required within Section VIII, Greenhouse Gas Emissions, of this IS/MND, which would help to further reduce the emissions of criteria pollutants. As such, the operational emissions presented above represent a conservative estimate.

Cumulative Emissions

Past, present, and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By nature, air pollution is largely a cumulative impact. A single project is not sufficient in size to, by itself, result in nonattainment of AAQS. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant. In developing thresholds of significance for air pollutants, SMAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. The thresholds of significance presented in **Error! Reference source not found.** represent the levels at which a project's individual emissions of criteria air pollutants or precursors would result in a cumulatively considerable contribution to the SVAB's existing air quality conditions. Because the Fairway Oaks VTM would result in emissions below the applicable thresholds of significance established by SMAQMD for criteria pollutants, the project would not result in a cumulatively considerable contribution to the region's existing air quality conditions.

Conclusion

As discussed above, the Fairway Oaks VTM would not result in construction or operational emissions in excess of the applicable thresholds of significance. Because the Fairway Oaks VTM would result in emissions below the applicable thresholds of significance during both construction and operations, the proposed project would not conflict with or obstruct implementation of the applicable air quality plan, result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state AAQS. Therefore, a ***less-than-significant*** impact would result.

c. Some land uses are considered more sensitive to air pollution than others, due to the types of population groups or activities involved. Heightened sensitivity may be caused by health problems, proximity to the emissions source, and/or duration of exposure to air pollutants. Children, pregnant women, the elderly, and those with existing health problems are especially vulnerable to the effects of air pollution. Sensitive receptors are typically defined as facilities where sensitive receptor population groups (i.e., children, the elderly, the acutely ill, and the chronically ill) are likely to be located. Accordingly, land uses that are typically considered to be sensitive receptors include residences, schools, playgrounds, childcare centers, retirement homes, convalescent homes, hospitals, and medical clinics. The nearest existing sensitive receptors would be the single-family residences located adjacent to the project site, along Ranch Road, Tradepost Trail, and Glendale Avenue, Cornell Road, and Bernal Road.

The major pollutant concentrations of concern are localized carbon monoxide (CO) emissions and toxic air contaminant (TAC) emissions, as well as regional effects of emissions of criteria pollutants, which are discussed in further detail below.

Localized Carbon Monoxide Emissions

Localized concentrations of CO are related to the levels of traffic and congestion along streets and at intersections. Per the SMAQMD's CEQA Guidelines, emissions of CO are generally of less concern than other criteria pollutants, as operational activities are not likely to generate substantial quantities of CO, and the SVAB has been in attainment for CO for multiple years. Consequently, the proposed project is not anticipated to result in significant impacts to air quality related to localized CO emissions.

TAC Emissions

Another category of environmental concern is TACs. The CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* (Handbook) provides recommended setback distances for sensitive land uses from major sources of TACs, including, but not limited to, freeways and high traffic roads, distribution centers, and rail yards. The CARB has identified diesel particulate matter (DPM) from diesel-fueled engines as a TAC; thus, high volume freeways, stationary diesel engines, and facilities attracting heavy and constant diesel vehicle traffic are identified as having the highest associated health risks from DPM. Health risks associated with TACs are a function of both the concentration of emissions and the duration of exposure, where the higher the concentration and/or the longer the period of time that a sensitive receptor is exposed to pollutant concentrations would correlate to a higher health risk.

The proposed project does not include any operations that would be considered a substantial source of TACs. Accordingly, operations of the proposed project would not expose sensitive receptors to excess concentrations of TACs.

Construction activities have the potential to generate DPM emissions related to the number and types of equipment typically associated with construction. Off-road heavy-duty diesel equipment used for site grading, paving, and other construction activities result in the generation of DPM. However, construction is temporary and occurs over a relatively short duration in comparison to the operational lifetime of the proposed project. Health risks are typically associated with exposure to high concentrations of TACs over extended periods of time (e.g., 30 years or greater), whereas the construction period associated with the Fairway Oaks VTM Site would likely last approximately five years. All construction equipment and operation thereof would be regulated per the In-Use Off-Road Diesel Vehicle Regulation, which is intended to help reduce emissions associated with off-road diesel vehicles and equipment, including DPM. In addition, only portions of the site would be disturbed at a time, with operation of construction equipment regulated by federal, State, and local regulations, including SMAQMD rules and regulations, and occurring intermittently throughout the course of a day. Thus, the likelihood that any one sensitive receptor would be exposed to high concentrations of DPM for any extended period of time would be low.

Therefore, the proposed project would not expose any existing sensitive receptors to any new permanent or substantial TAC emissions.

Criteria Pollutant Emissions

Recent rulings from the California Supreme Court (including the *Sierra Club v. County of Fresno* (2018) 6 Cal. 5th 502 case regarding the proposed Friant Ranch Project) have underscored the need for potential health impacts resulting from the emission of criteria pollutants during operations of proposed projects. Although analysis of project-level health

risks related to the emission of CO and TACs has long been practiced under CEQA, the analysis of health impacts due to individual projects resulting from emissions of criteria pollutants is a relatively new field. In fact, the analysis of potential health impacts resulting from criteria pollutant emissions has long been focused on a regional or air basin wide level. The reason for a wide geographic focus on health impacts from criteria pollutants is that criteria pollutants act on a large, regional scale, whereas TACs and CO act on a more localized level. For instance, according the CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*, health impacts related to many common sources of TACs are experienced within the first 500 to 1,000 feet from a source of emissions.[4] The localized nature of impacts from TACs allows for dispersion modeling of TACs to be undertaken with a detailed scope of focus and high degree of confidence. In contrast, health risks from criteria pollutants occur over entire air basins, such as the Sacramento Federal Nonattainment Area (SFNA) for ground-level ozone, which encompasses all of Sacramento and Yolo counties, and portions of Placer, El Dorado, Solano, and Sutter counties.

In many cases, the concern regarding health risks from criteria pollutants is not related to the specific pollutant itself, such as ROG or NO_X, but the potential for the pollutant to undergo reactions within the atmosphere and form secondary pollutants, such as ozone. In such cases, the secondarily formed ozone is the pollutant of concern related to health risks, rather than the pollutant ROG or NO_X itself. The formation of ozone is dependent upon various regional factors, including the presence or absence of chemicals and elements in the atmosphere, geography of the given area, the presence of solar energy, as well as meteorological and climatological conditions. In addition, while PM can be emitted directly to the atmosphere by projects, PM can also be formed secondarily by precursor emissions. Thus, the formation of PM can similarly be dependent on regional atmospheric chemistry, geography, weather, and climate. The complex reactions and conditions that lead to the formation of ozone and PM in the atmosphere can also result in the transport of pollutants over wide areas. For instance, transport of emissions from development within the San Francisco Bay Area are often cited as a leading cause of poor air quality in the SFNA. The potential for criteria pollutant emissions to be transported over wide areas means that the emissions of ozone precursor pollutants, such as ROG and NO_X, from a single project does not necessarily translate directly into a specific concentration of ozone, or a specific level of health risk, in that area.

In December of 2019, SMAQMD released the *Draft Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District* (Draft Guidance) for the analysis of criteria emissions in areas within the District's jurisdiction.[5] The Draft Guidance represents SMAQMD's effort to develop a methodology that provides a consistent, reliable, and meaningful analysis in response to the Supreme Court's direction on correlating health impacts to a project's emissions.

The Draft Guidance was prepared by conducting regional photochemical modeling, and relies on the USEPA's Benefits Mapping and Analysis Program (BenMAP) to assess health impacts from ozone and $PM_{2.5}$. SMAQMD has prepared two draft tools that are intended for use in analyzing health risks from criteria pollutants. Small projects with criteria pollutant emissions close to or below SMAQMD's adopted thresholds of

[4] California Air Resources Board. *Air Quality and Land Use Handbook: A Community Health Perspective*. April 2005.
[5] Sacramento Metropolitan Air Quality Management District. *Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District*. December, 2019.

significance may use the Minor Project Health Screening Tool, while larger projects with emissions between two and six times greater than SMAQMD's adopted thresholds may use the Strategic Area Project Health Screening Tool.[6] Considering the proposed project would result in emissions lower than the SMAQMD's thresholds of significance, the project would qualify for the Minor Project Health Effects Screening Tool. Based on the Minor Project Health Effects Screening Tool, the proposed project would result in 1.21 premature deaths per year due to the project's PM impacts, and would result in 0.019 premature deaths per year due to the project's ozone impacts (see Appendix A). Such numbers represent a very small increase over the background incidence of pre-mature deaths due to PM and ozone concentrations (0.00065 percent and 0.0002 percent, respectively).

As discussed above, the nature of criteria pollutants is such that the emissions from an individual project cannot be directly identified as responsible for health impacts within any specific geographic location. As a result, attributing health risks at any specific geographic location to a single proposed project is not feasible. Nonetheless, the results of the Minor Project Health Effects Screening Tool have been presented for informational purposes. Overall, because the proposed project would be relatively small compared to the regional growth and development that drives health impacts from criteria pollutants, and the anticipated air quality emissions would fall below all applicable thresholds of significance, potential health impacts related to criteria air pollutants would be less-than-significant.

Conclusion

Based on the above discussion, the proposed project would not expose any sensitive receptors to substantial concentrations of pollutants, including localized CO, TACs, or criteria air pollutants, during construction or operation. Therefore, the proposed project would result in a ***less-than-significant*** impact related to the exposure of sensitive receptors to substantial pollutant concentrations.

d. Emissions such as those leading to odor have the potential to adversely affect people. Emissions of principal concern include emissions leading to odors, emission that have the potential to cause dust, or emissions considered to constitute air pollutants. Air pollutants have been discussed in sections "a" through "d" above. Therefore, the following discussion focuses on emissions of odors and dust.

Per the SMAQMD CEQA Guidelines, odors are generally regarded as an annoyance rather than a health hazard.[7] Manifestations of a person's reaction to odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache). The presence of an odor impact is dependent on a number of variables including: the nature of the odor source; the frequency of odor generation; the intensity of odor; the distance of the odor source to sensitive receptors; wind direction; and sensitivity of the receptor.

Due to the subjective nature of odor impacts, the number of variables that can influence the potential for an odor impact, and the variety of odor sources, quantitative analysis to determine the presence of a significant odor impact is difficult. Typical odor-generating land uses include, but are not limited to, wastewater treatment plants, landfills, and

[6] Sacramento Metropolitan Air Quality Management District. *Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District* [pgs 5-10]. January 31, 2020.

[7] Sacramento Metropolitan Air Management District. *Guide to Air Quality Assessment in Sacramento County*. May 2017.

composting facilities. The proposed project would not introduce any such land uses and is not located in the vicinity of any such existing or planned land uses.

Construction activities often include diesel-fueled equipment and heavy-duty trucks, which could create odors associated with diesel fumes that may be considered objectionable. However, construction activities would be temporary, and hours of operation for construction equipment would be limited to weekdays between 6:00 AM and 8:00 PM, and between 7:00 AM and 8:00 PM on Saturday and Sundays, per Sections 8.40.060(E) and (F) of the City of Galt Municipal Code. Project construction would also be required to comply with all applicable SMAQMD rules and regulations, particularly associated with permitting of air pollutant sources. The aforementioned regulations would help to minimize emissions, including emissions leading to odors. Accordingly, substantial objectionable odors would not be expected to occur during construction activities.

SMAQMD regulates objectionable odors through Rule 402 (Nuisance), which prohibits any person or source from emitting air contaminants that cause detriment, nuisance, or annoyance to a considerable number of persons or the public. Rule 402 is enforced based on complaints. If complaints are received, the SMAQMD is required to investigate the complaint, as well as determine and ensure a solution for the source of the complaint, which could include operational modifications. Thus, although not anticipated, if odor complaints are submitted after the proposed project is approved, the SMAQMD would ensure that such odors are addressed and any potential odor effects reduced to less than significant.

With regard to dust, buildout of the Fairway Oaks VTM Site and any future development on the Island Annexation Area would be required to comply with all applicable SMAQMD rules and regulations for construction, including, but not limited to, Rule 403 (Fugitive Dust) and Rule 404 (Particulate Matter). Furthermore, all projects are required to implement the SMAQMD's Basic Construction Emission Control Practices. Compliance with SMAQMD rules and regulations and Basic Construction Emission Control Practices would help to ensure that dust is minimized during project construction.

For the aforementioned reasons, construction and operations of the proposed project would not result in emissions, such as those leading to odors, adversely affecting a substantial number of people, and a ***less-than-significant*** impact would result.

IV. BIOLOGICAL RESOURCES. *Would the project:*	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	✖	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	✖	☐	☐
c. 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?	☐	✖	☐	☐
d. Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?	☐	☐	✖	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	✖	☐	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	✖	☐

Discussion

a. The following discussion is based primarily on a Biological Resources Assessment prepared for the proposed project by ECORP Consulting, Inc. (see Appendix B).[8] For the purposes of the following discussion, the term 'Study Area' refers to both the Island Annexation Area and the Fairway Oaks VTM Site.

As noted in the Biological Resource Assessment, special-status species are defined to include the following:

- Plants and animals that are listed, proposed for listing, or candidates for future listing as threatened or endangered under the Federal Endangered Species Act (ESA) or the California ESA;
- Plants and animals that meet the definitions of endangered or rare under § 15380 of the CEQA Guidelines, which may include species not found on either State or Federal Endangered Species lists;
- Plants and animals that are identified as a Species of Special Concern by the California Department of Fish and Wildlife (CDFW);
- Bird species identified as Birds of Conservation Concern by the United States Fish and Wildlife Services (USFWS);
- Plants that are considered by the California Native Plant Society (CNPS) to be "rare, threatened, or endangered in California", "plants about which more

[8] ECORP Consulting, Inc. *Biological Resources Assessment: Fairway Oaks Project and Annexation Area*. 2019.

information is needed", or "plants of limited distribution" (i.e., species with a California Rare Plant Rank (CRPR) of 1B, 2, 3, or 4);
- Plants that are listed as rare under the Native Plant Protection Act;
- Plants and animals that are fully protected in California in accordance with the California Fish and Game Code, §§ 3511 (birds), 4700 (mammals), 5050 (amphibians and reptiles), and 5515 (fishes); or
- Plants and animals that are Covered Species under the South Sacramento Habitat Conservation Plan (SSHCP).

In addition to regulations for special-status species, most birds in the U.S., including non-status species, are protected by the Migratory Bird Treaty Act (MBTA) of 1918. Under the MBTA, destroying active nests, eggs, and young is illegal.

As part of the Biological Resource Assessment prepared for the proposed project, ECORP conducted a search of published records of special-status plant and wildlife species known to occur within the vicinity of the Study Area using the California Natural Diversity Data Base (CNDDB) application. The intent of the database review was to identify documented occurrences of special-status species in the vicinity of the Study Area, to determine their locations relative to the site and off-site improvement areas, and for use in the field assessment of habitats suitable for special-status species within the site. ECORP also used the USFWS Information, Planning, and Consultations System Resource Report List, CNPS electronic Inventory of Rare and Endangered Plants of California, the eBird online database of bird distribution and abundance, aerial imagery, and SSHCP-Modeled Species Habitat data to obtain information about special-status species distribution.

In September of 2019, ECORP biologists conducted a reconnaissance-level field survey of the project site to record biological resources on the Fairway Oaks VTM Site. During the survey, the site was traversed on foot, and topographic maps and aerial images were referenced. Information was collected and recorded regarding potential aquatic features, animal species that were observed, and habitat and vegetation communities on-site.

Habitat types and land covers have been assigned to the Study Area as shown in Figure 5. Based on the reconnaissance level survey performed by ECORP, the land cover types have been updated as shown in Figure 6. ECORP determined the following land covers are present: High Density Development; Low Density Development; Major Roads; Mixed Riparian Woodland; Streams/Creeks; and Valley Grassland. High Density Development and Low Density Development includes single-family homes, residential streets, and landscaped areas. The Major Roads land cover type refers to South Lincoln Way and the intersection at Cornell Road. Mixed Riparian Woodland is described as an aquatic land cover type, mapped along the Dry Creek corridor. Streams/Creeks land cover includes intermittent and perennial linear water features such as rivers, streams, and creeks, and exists at the southern boundary of the Study Area. The Valley Grassland identified consists of mechanically tilled annual grassland that encompasses the majority of the Study Area.

The proposed project does not involve any development within the Island Annexation Area. However, future development of the Island Annexation Area could result in approximately 158 single-family residences, which could adversely affect special-status species in the area. The potential for species covered by the SSHCP and other special-status species to occur on the Island Annexation Area and the Fairway Oaks VTM Site are discussed separately in further detail below.

Figure 5
SSHCP Land Cover Types

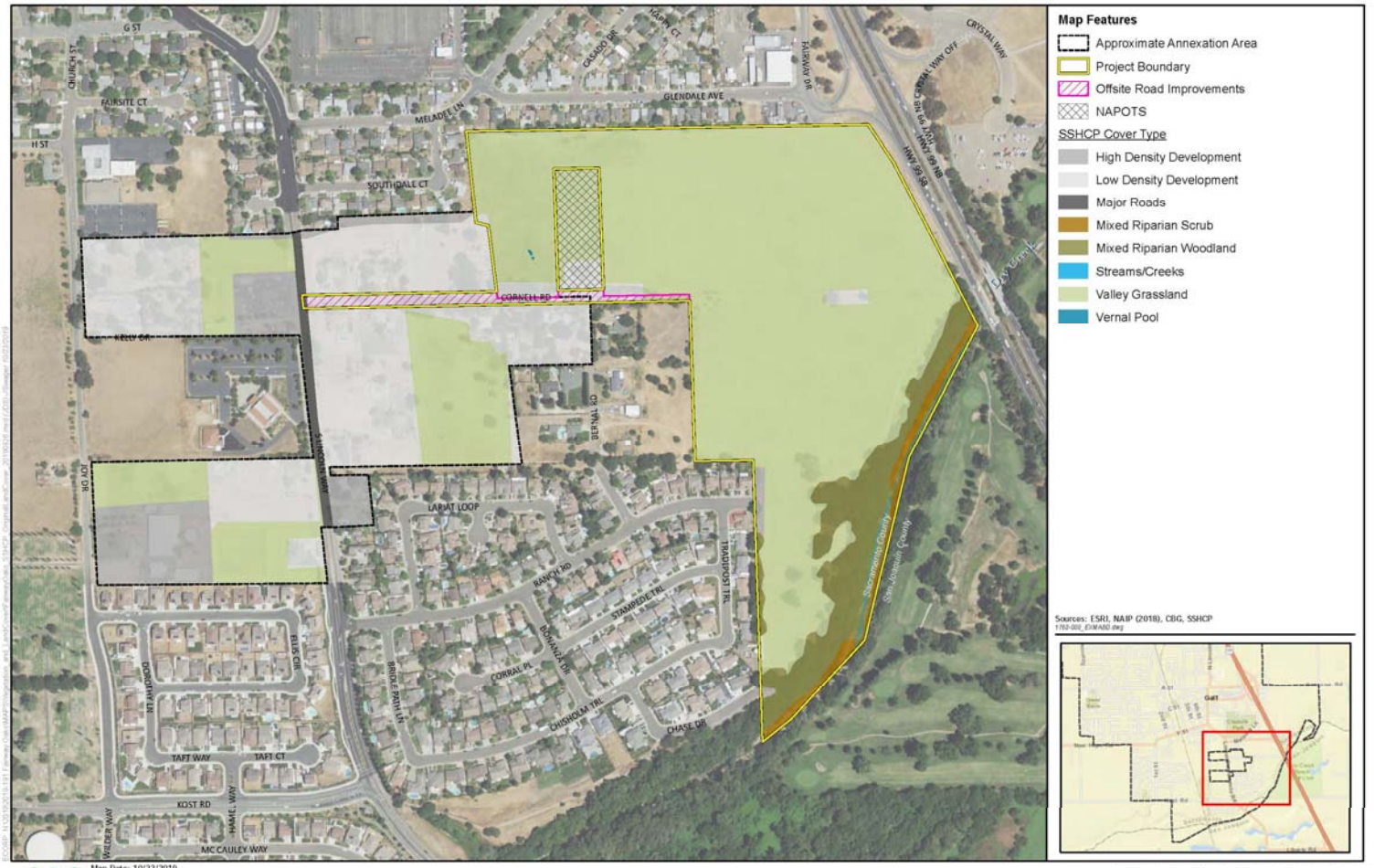
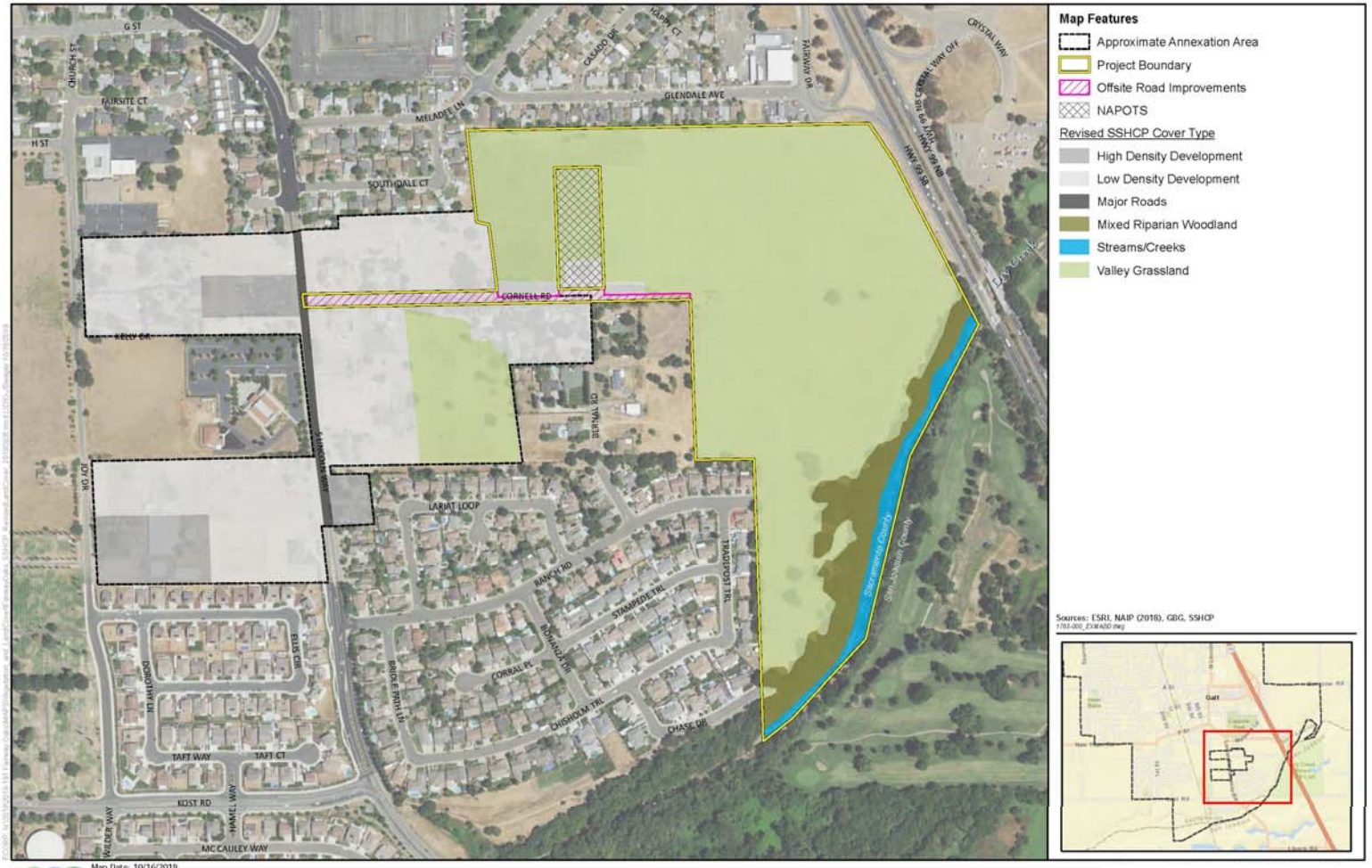


Figure 6
Revised Land Cover Types



Island Annexation Area

The Island Annexation Area consists mostly of low-density, single-family residences and associated roadways. A reconnaissance-level site assessment was not conducted for the Island Annexation Area. However, according to the Biological Resources Assessment, wildlife species are likely to be similar to those that were identified during the site assessment of the Fairway Oaks VTM Site.

Special-Status Plants

Seven special-status plants were identified to have the potential to occur on-site based on the literature review and SSHCP-Modeled habitat. The plant species are: succulent owl's clover, Parry's rough tarplant, dwarf downingia, legenere, Sanford's arrowhead, marsh skullcap, and side-flowering skullcap. Because future development within the Island Annexation could alter or remove suitable habitat for the aforementioned special-status plants, a potentially significant impact could occur.

Special-Status Wildlife

Based on the literature and database searches and SSHCP-Modeled habitat, a total of 19 special status species have the potential to occur within the Island Annexation Area. The following species were identified to have the potential to occur on-site and are discussed in further detail below: VELB, California tiger salamander, western spadefoot, burrowing owl, Cooper's hawk, ferruginous hawk, greater sandhill crane, loggerhead shrike, Northern harrier, Swainson's hawk, tricolored blackbird, white-tailed kite, yellow warbler, Western red bat, American badger, vernal pool fairy shrimp, vernal pool tadpole shrimp, midvalley fairy shrimp, and Ricksecker's water scavenger beetle.

Valley Elderberry Longhorn Beetle

The valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*, VELB) is listed as a threatened species under the ESA. The VELB is entirely dependent on the elderberry plant for survival. The elderberry plant, which occurs in healthy riparian and woodland communities, hosts VELB eggs and larva. There is one documented CNDDB occurrence of the VELB within five miles of the project area, and two clumps of elderberry shrubs were mapped on the project site during the field survey. Based on habitat suitability, VELB has potential to occur within the project area, and future implementation of development on the site could impact potential VELB habitat. As such, a potentially significant impact to the species could occur.

California Tiger Salamander

The California tiger salamander (*Ambystoma californiense*) is a federally-listed threatened species, and the project site falls into the range of the Central Valley DPS of the species. The DPS of the California tiger salamander was federally-listed as threatened on August 4, 2004, and the USFWS designated critical habitat for the California tiger salamander Central California DPS in 2005.

California tiger salamanders occur in grasslands and open oak woodlands that provide suitable over summering and/or breeding habitats. California tiger salamanders spend the majority of their lives underground, often in California ground squirrel or Botta's pocket gopher burrows. The species typically only emerge from their subterranean refugia for a few nights each year during the rainy season to migrate to breeding ponds. Adult California tiger salamanders have been observed up to 1.3 miles from breeding ponds. As such,

unobstructed migration corridors are an important component of California tiger salamander habitat.

Stock ponds, seasonal wetlands, and deep vernal pools typically provide most of the breeding habitat used by California tiger salamander. In such locations, California tiger salamander attach their eggs to rooted, emergent vegetation, and other stable filamentous objects in the water column. Occasionally California tiger salamanders are found breeding in slow-moving, streams or ditches. Ditches and/or streams that are subject to rapid flows, even if only on occasion, typically will not support or sustain California tiger salamander egg attachment through hatching, and thus, are not usually used successfully by California tiger salamander for breeding. Similarly, streams and/or ditches that support predators of California tiger salamander or their eggs and larvae such as fish, bullfrogs, red swamp crayfish, or signal crayfish, almost never constitute suitable breeding habitat.

Three documented CNDDB occurrences of the species were recorded within five miles of the project area, with two of the occurrences presumed to be extant. Both of the occurrences presumed to be extant occurred on the other side of Dry Creek approximately two to three miles from the project site. The distance from the project site to the two occurrences assumed to be extant, combined with Dry Creek and SR 99 intervening the occurrence locations and the project site, reduce the potential for the species to have dispersed to the project site from the identified occurrence locations. Nonetheless, CDFW and USFWS may consider the project site as suitable upland habitat for California tiger salamander, and grading and construction during future development on the project site could impact such habitat. As such, a potentially significant impact to the species could occur.

Western Spadefoot

The western spadefoot (*Spea hammondii*) is listed as a CDFW species of special concern. The species' habitat requirements include loose soils in which to burrow, and breeding ponds. Western spadefoots spend most of their adult life in underground burrows, and breed in temporary rain pools or seasonal wetlands. Documented CNDDB occurrences of the species have not been recorded within five miles of the project area, but the closest occurrence is near Coyote Creek, which is a tributary to Dry Creek. As such, the western spadefoot has the potential to occur on-site. Further, the Dry Creek riparian habitat and valley grassland provide suitable aquatic and upland habitat for the species. The SSHCP-Modeled Species Habitat is also present within the Study Area. Ground disturbance associated with future development on the site could reduce suitable western spadefoot habitat, and a potentially significant impact could occur.

Burrowing Owl

The burrowing owl (*Athene cunicularia*) is a CDFW Species of Special Concern and USFWS Bird of Conservation Concern. Burrowing owl habitat is usually found in annual and perennial grasslands, characterized by low-growing vegetation. The species can also inhabit developed areas such as golf courses, vacant lots in residential areas, school campuses, and fairgrounds. Often, the burrowing owl utilizes rodent burrows, typically California ground squirrel burrows, for nesting and cover. The species may also on occasion dig their own burrows or use man-made objects such as concrete culverts or rip-rap piles for cover. Documented CNDDB occurrences of the species have not been recorded within five miles of the project area, but the valley grassland land type in the project area provides suitable wintering habitat for the burrowing owl. In addition, the

California ground squirrel exists on-site, whose burrows provide suitable nesting habitat for the species. As such, the burrowing owl has the potential to occur on the project site. Implementation of future development on the project site could reduce suitable wintering and nesting habitat, and a potentially significant impact could occur.

Raptors

Cooper's hawk (*Accipiter cooperii*) is listed as a CDFW watch list species. The species typically nests and forages in riparian woodland and dense oak woodland habitat. Documented CNDDB occurrences of the species within five miles of the project area do not exist, but Cooper's hawk was observed on-site during the field survey.

Loggerhead shrike (*Lanius ludovicianus*) is listed as a CDFW Species of Special Concern and USFWS Bird of Conservation Concern. The species nests in small trees and shrubs in open country with short vegetation, such as pastures, mowed roadsides, golf courses, and open woodlands. Documented CNDDB occurrences of the species within five miles of the project area do not exist, but the trees and grassland on-site provide suitable nesting and foraging habitat.

The northern harrier (*Circus cyaneus*) is listed as a CDFW Species of Special Concern. The species typically nests in emergent wetland/marsh, open grasslands, or savannah communities with dense vegetation. Foraging habitat includes a variety of open spaces such as agricultural fields and grasslands. While documented CNDDB occurrences of the species do not occur within five miles of the project area, the grassland on-site could provide suitable nesting and foraging habitat.

The white-tailed kite (*Elanus leucurus*) is protected under Section 3511 of the California Fish and Game Code. Nesting often occurs in trees within riparian, oak woodland, savannah, and agricultural communities that are near foraging areas such as low elevation grasslands, agricultural, meadows, and farmlands. While documented CNDDB occurrences of the species do not exist within five miles of the project area, the riparian woodland and grassland on-site provides suitable nesting and foraging habitat.

The above special-status raptors have the potential to occur on-site, and ground disturbance from future development of the project site could reduce suitable habitat. Accordingly, a potentially significant impact could occur.

It should be noted that potential impacts to Swainson's hawks are discussed separately below.

Swainson's Hawk

Swainson's hawk (*Buteo swainsoni*) is a State-listed threatened species afforded protection pursuant to the California ESA. The species is protected from direct take under the federal Migratory Bird Treaty Act. The Swainson's hawk inhabits open to semi-open areas at low to middle elevations in valleys, dry meadows, foothills, and level uplands. The species nests almost exclusively in trees and will nest in almost any tree species that is at least 10 feet tall. Nests are constructed in isolated trees that are dead or alive along drainages and in wetlands, or in windbreaks in fields and around farmsteads. Swainson's hawks occasionally nest in shrubs, on telephone poles, and on the ground. Foraging habitats include alfalfa fields, fallow fields, beet, tomato, and other low-growing row or field crops, dry-land and irrigated

pasture, and rice land when not flooded. During the nesting season, Swainson's hawks usually forage within two miles of their nests.

CNDDB documents 58 occurrences of the species within five miles of the project site, and a Swainson's hawk was observed flying overhead during the field survey. The valley grassland and riparian woodland habitats on-site provide suitable nesting and foraging habitat, and the Swainson's hawk has the potential to occur on-site. Ground disturbance from future development within the project site could affect suitable nesting and foraging habitat, and a potentially significant impact could occur.

Greater Sandhill Crane

Greater sandhill crane (*Antigone canadensis tabida*) is a State-listed threatened species, is protected under the California ESA, and fully protected under the California Fish and Game Code. The species tends to nest in northeastern California during March through August, and winters in the Central Valley in wetland and agricultural habitat. Documented CNDDB occurrences of the species have not been recorded within five miles of the project area; however, based on foraging habitat suitability, the greater sandhill crane has the potential to occur on-site. Ground disturbance from future implementation of development on the site could reduce suitable foraging habitat, and a potentially significant impact could occur.

Tricolored Blackbird

The tricolored blackbird (*Agelaius tricolor*) is listed as a CDFW Species of Special Concern, a USFWS Bird of Conservation Concern, and is threatened under the California ESA. The tricolored blackbird is typically found near freshwater, particularly near marsh habitat. Flooded lands, margins of ponds, and grassy fields in summer and winter provide typical foraging habitat for the species, and nesting habitat includes emergent marsh, riparian woodland, densely vegetated fields, and blackberry thickets.

CNDDB documents 21 occurrences of the species within five miles of the project site, and the valley grassland on-site provides suitable foraging habitat for the species. Ground disturbance associated with implementation of future development on the site could reduce foraging habitat availability, and a potentially significant impact would occur.

Nesting and Migratory Birds

The existing trees within the project site may support nesting birds such as the house finch, northern mockingbird, and American robin. In addition, the yellow warbler has the potential to rely on the on-site riparian woodland for foraging habitat during their Spring and Fall migration. Future buildout on the site the nesting period for migratory birds (i.e., typically between February 1 to August 31) or during the migration season for the yellow warbler could pose a risk of nest abandonment, death of live eggs or young, and reduction of foraging habitat. Thus, a potentially significant impact could occur.

Western Red Bat

The western red bat (*Lasiurus blossevillii*) is considered a California "species of special concern." The western red bat is easily distinguished from other western bat species by its distinctive red coloration. The species roosts primarily in the foliage of trees or shrubs in edge habitats bordering streams or open fields, in orchards, and occasionally urban areas. Western red bats may be associated with intact riparian habitat, especially with

willows, cottonwoods, and sycamores. Documented CNDDB occurrences of the species have not been recorded within five miles of the project area, but, based on nesting and foraging habitat suitability, the western red bat has the potential to occur on-site. Ground disturbance from future development on the site could reduce suitable habitat, and a potentially significant impact could occur.

American Badger

The American badger (*Taxidea taxus*) is a California "species of special concern." The species is found in a variety of habitats, especially in open habitats such as oak-savannah and grasslands where the species' presence is typically identified by distinctive, large underground burrows excavated in friable (loose) soils. The nocturnal mammal is rarely observed. Documented CNDDB occurrences of the species have not occurred within five miles of the project area, but based on habitat suitability, the American badger has the potential to occur on-site. Ground disturbance from future development on the site could reduce suitable habitat, and a potentially significant impact could occur.

Vernal Pool Fairy Shrimp

The vernal pool fairy shrimp (*Branchinecta lynchi*) is listed as threatened in accordance with the federal ESA. Vernal pool fairy shrimp may occur in seasonal ponds, vernal pools, and swales during the wet season, which generally occurs from December through May. CNDDB occurrences have not been documented near the Study Area, but SSHCP-Modeled habitat is present within the Island Annexation Area. Therefore, based on habitat availability, the vernal pool fair shrimp has the potential to occur on-site and future development within the Island Annexation Area could reduce vernal pool fair shrimp habitat, resulting in a potentially significant impact.

Vernal Pool Tadpole Shrimp

The vernal pool tadpole shrimp (*Lepidurus packardi*) is listed as endangered pursuant to the federal ESA. The species inhabits vernal pools, and are distinguished by their large, shield-like carapace. CNDDB occurrences have not been documented near the Study Area, but SSHCP-Modeled habitat is present within the Island Annexation Area. Therefore, based on habitat availability, the vernal pool tadpole shrimp has the potential to occur on-site. If future development on the Island Annexation Area were to affect vernal pool tadpole shrimp habitat, a potentially significant impact would occur.

Midvalley Fairy Shrimp

The Midvalley fairy shrimp (*Branchinecta mesovallensis*) is not listed pursuant to either the California or federal ESAs, but is covered by the SSHCP. The species typically occurs in small, shallow vernal pools, swales, and various artificial ephemeral wetland types. CNDDB occurrences of the species have not been recorded near the Study Area, but SSHCP-Modeled habitat occurs within the Island Annexation Area. Therefore, the Midvalley fairy shrimp has the potential to occur on-site, and, if future development within the Island Annexation Area were to remove the species' habitat, a potentially significant impact could occur.

Ricksecker's Water Scavenger Beetle

Ricksecker's water scavenger beetle (*Hydrochara rickseckeri*) is not listed on the California or federal ESAs, but the species is covered under the SSHCP. Ricksecker's water scavenger beetles inhabit ponds and vernal pools in the Coast Range and Central Valley. CNDDB occurrences of the species have not been documented near the Study

Area. However, based on aerial imagery and literature review, potential Ricksecker's water scavenger beetle habitat may exist within the Island Annexation Area. Therefore, future development on the Island Annexation Area could impact the species' habitat and a potentially significant impact could occur.

Fairway Oaks VTM Site

The Fairway Oaks VTM Site is primarily composed of tilled, undeveloped, ruderal grassland with the Dry Creek riparian corridor to the southeast. The potential for special-status plant and animal species to occur on-site is discussed below.

Special-Status Plants

Special-status plants generally occur in relatively undisturbed areas within vegetation communities such as vernal pools, marshes and swamps, chenopod scrub, seasonal wetlands, riparian scrub, chaparral, alkali playa, dunes, and areas with unusual soil characteristics. Based on the literature and database searches, a total of six special-status plant species were determined to have the potential to occur within the project area: watershield, bristly sedge, Parry's rough tarplant, Sanford's arrow, marsh skullcap, and side-flowering skullcap. Because implementation of the proposed project would alter suitable habitat for the aforementioned special-status plants, a potentially significant impact could occur.

Special-Status Wildlife

Based on the literature and database searches, a total of 18 special status species have the potential to occur on the Fairway Oaks VTM Site, 15 of which are covered under the SSHCP. Significant overlap of special-status wildlife species potential exists between the Island Annexation Area and Fairway Oaks VTM Site. The following 15 species were identified to have the potential to occur on the Fairway Oaks VTM Site, and were previously discussed above under the Island Annexation Area analysis: VELB, California tiger salamander, western spadefoot, burrowing owl, Cooper's hawk, ferruginous hawk, greater sandhill crane, loggerhead shrike, Northern harrier, Swainson's hawk, tricolored blackbird, white-tailed kite, yellow warbler, Western red bat, and American badger. The conclusions presented above for the aforementioned species on the Island Annexation Area apply to the Fairway Oaks VTM Site as well.

The remaining three special-status wildlife species that are unique to the Fairway Oaks VTM Site and their potential to occur on-site are discussed in further detail below: steelhead, Sacramento splittail, and northwestern pond turtle.

Steelhead

The Central Valley Distinct Population Segment (DPS) of steelhead *(Oncorhynchus mykiss)* is a federally-listed threatened species. The DPS includes all populations of steelhead in the Sacramento and San Joaquin rivers and their tributaries. The steelhead's typical habitat includes freshwater rivers and streams, and spawning occurs in shallow and fast-moving riffles with small gravel and cobble. Dry Creek is considered a tributary to the Mokelumne River and, based on the aerial imagery, Dry Creek contributes flow to both the Cosumnes and the Mokelumne rivers. The lower Mokelumne River is designated Critical Habitat for the steelhead, and Dry Creek is classified as spawning habitat for the species. CNDDB occurrences of steelhead have not been documented in Dry Creek, but steelhead are present in the lower Mokelumne River and may occur in the Cosumnes River, and impassable barriers are not known to exist that would prevent steelhead from

traveling from the Cosumnes or Mokelumne rivers to Dry Creek. Considering the lack of recorded occurrences of steelhead in Dry Creek, but the proximity and connection of the portion of Dry Creek near the project site to known steelhead habitat, steelhead has low potential to occur within the project area. The proposed project would preserve the Dry Creek corridor and maintain the adjacent land as open space. As such, the steelhead spawning habitat would not be influenced, and a less-than-significant impact would occur to the species.

Sacramento Splittail

The Sacramento splittail is designated as a CDFW species of special concern. Typical habitat includes slow moving sections of rivers and sloughs, and the species prefers low-salinity, shallow waters. Species spawning and foraging requires flooded vegetation. The species are primarily found in the Sacramento and San Joaquin River estuaries, especially the Delta and Suisun Marsh. Documented CNDDB occurrences have not occurred near the project area, but the species is known to occur in the floodplains of the lower Cosumnes River. Dry Creek contributes flow to the Cosumnes River, and thus, the Sacramento splittail has low potential to occur within the project area. The proposed project would preserve the Dry Creek corridor and maintain the adjacent land as open space. As such, the Sacramento splittail spawning and foraging habitat would not be adversely affected, and a less-than-significant impact would occur to the species.

Northwestern Pond Turtle

The northwestern pond turtle (*Actinemys marmorata*) is a CDFW species of special concern. Typically, the species is found in fresh and brackish ponds, marshes, and slow-moving streams. The species is most often found in aquatic environments with plant communities dominated by watercress, cattail, and other aquatic vegetation. The species usually only leaves the aquatic site to reproduce and to overwinter. Although adults are habitat generalists, the young require shallow edgewater with vegetation in which to forage. The northwestern pond turtle also requires upland areas for burrowing habitat, where the species digs nests and buries its eggs, with most nests located in uplands within 200 meters of water. Documented CNDDB occurrences of the species have not been recorded within five miles of the project area, but the Dry Creek riparian habitat and valley grassland land cover provide suitable aquatic and upland habitat for the species. Therefore, the northwestern pond turtle has the potential to occur on the project site. Implementation of the proposed project could reduce suitable habitat for northwestern pond turtle, and a potentially significant impact could occur.

Conclusion

Based on the above, the presence of potential habitat for special-status species on the project site, construction activities could result in the loss of habitat and significant adverse effects to special-status plants and wildlife. In addition, the site contains suitable nest trees for nesting raptors and migratory birds protected by the MBTA. Thus, the proposed project could have an adverse effect, either directly or through habitat modifications, on species identified as special-status species in local or regional plans, policies, or regulations, or by the CDFW or the USFWS, and a ***potentially significant*** impact could result.

Mitigation Measure(s)

Implementation of the following mitigation measures, as adapted from the SSHCP, would reduce the above potential impact to a *less-than-significant* level.

Island Annexation Area

IV-1. *Conduct a Reconnaissance-level Site Investigation and Literature Review: The proponent for future road improvement or development projects within the Island Annexation Area shall ensure completion of a reconnaissance-level site investigation and a literature review to determine the approximate extent of potential Waters of the U.S., to verify the SSHCP land cover types, and to determine the presence of potential habitat for special-status plants and animals. The literature review shall include available information and a query of the CDFW CNDDB, CNPS, and USFWS databases for potentially occurring special-status species near the Island Annexation Areas If there is potential for impacts to biological resources not evaluated within the Biological Resources Assessment, completion of a project-specific Biological Resources Assessment and/or wetland delineation may be necessary.*

IV-2. *Incorporate Relevant Mitigation Measures: If the reconnaissance-level site assessment and literature review described in Mitigation Measure IV-1 determine that all potential impacts from future projects to biological resources evaluated within the Biological Resources Assessment have been adequately assessed within the impact analysis for the Biological Resources Assessment, the following mitigation measures as described in Section 6.1 of the Biological Resources Assessment for the Fairway Oaks VTM Site shall be implemented for the Island Annexation Area: Mitigation Measures IV-3(a) through IV-13e), IV-3(v) through IV-3(ff), IV-3(gg) through IV-3(ii), IV-4 through IV-14.*

In addition, if the reconnaissance-level site assessment and literature review described in Mitigation Measure IV-1 confirm the presence of potential Waters of the U.S., Mitigation Measures IV-3(f) through IV-3(h) shall be implemented for the Island Annexation Area. For proposed projects on developed lands in the Island Annexation Area, the City shall determine whether participation in the SSHCP would be required.

Fairway Oaks VTM Site

IV-3(a). *SSHCP SPECIES-1 (Litter Removal Program): A litter control program will be instituted for the entire project site. All workers will ensure that their food scraps, paper wrappers, food containers, cans, bottles, and other trash are deposited in covered or closed trash containers. All garbage will be removed from the project site at the end of each work day, and construction personnel will not feed or otherwise attract wildlife to the area where construction activities are taking place.*

IV-3(b). *SSHCP SPECIES-2 (No Pets in Construction Areas): To avoid harm and harassment of native species, workers and visitors will not bring pets onto a project site.*

IV-3(c). *SSHCP SPECIES-3 (Take Report): If accidental injury or death of any Covered Species occurs, workers will immediately inform the approved biologist or on-site monitor and site supervisor. The approved biologist or on-site monitor will phone the appropriate contact person at the*

Implementing Entity. The Implementing Entity will immediately contact the Wildlife Agencies by telephone. A memorandum will be provided to the Implementing Entity and Wildlife Agencies within 1 working day of the incident. The report will provide the date and location of the incident, number of individuals taken, Final South Sacramento Habitat Conservation Plan 7384 5-92 February 2018 the circumstances resulting in the take, and any corrective measures taken to prevent additional take.

IV-3(d). *SSHCP SPECIES-4 (Post-Construction Compliance Report): A post-construction compliance report will be submitted to the SSHCP Implementing Entity within 30 calendar days of completion of construction activities or within 30 calendar days of any break in construction activity that lasts more than 30 days. The report will detail the construction start and completion dates, any information about meeting or failing to meet species take Avoidance and Minimization Measures (AMM), effectiveness of each AMM that was applied at the project site, and any known project effects to Covered Species.*

IV-3(e). *Before the approval of grading and improvement plans and before any groundbreaking activity associated with the Project, the Project applicants shall ensure that authorization pursuant to SSHCP will be obtained. To obtain such authorization, the SSHCP Permit Application shall include the following components as identified in Chapter 10, Section 10.4.2 of the SSHCP:*

- *Applicant Information.*
- *Project Description and Map.*
- *Land Cover Type Map.*
- *Wetland Delineation Map.*
- *Modeled Species Habitat map.*
- *Description of How the Development Complies with the SSHCP Avoidance and Minimization Measures outlined in Chapter 5, Section 5.4 of the SSHCP.*
- *Proposed Mitigation.*
- *Results of Covered Species (special-status species) Pre-Construction Surveys.*

IV-3(f). *SSHCP LID-1 (Stormwater Quality): When the size of a Covered Activity project exceeds the thresholds established by the State Water Resources Control Board (SWRCB) (see the most recent Stormwater Quality Design Manual for the Sacramento and South Placer Regions, or future SWRCB-approved design manuals applicable to the Plan Area), incorporate stormwater management into site design to satisfy the requirements outlined in the most recent Stormwater Quality Design Manual for the Sacramento and South Placer Regions. Stormwater management may include groundwater recharge (LID-2) and natural site features (LID-3).*

IV-3(g). *SSHCP LID-2 (Groundwater Recharge): When siting SSHCP Preserves containing Riparian, Open Water, or Freshwater Marsh SSHCP land cover*

types, the Implementing Entity will prioritize locations that are suitable for groundwater recharge.

IV-3(h). *SSHCP LID-3 (Natural Site Features): Incorporate preservation of a site's natural aquatic features (such as creeks and streams) into project design to retain natural hydrologic patterns and to retain habitat that might be used by Covered Species.*

IV-3(i). *SSHCP EDGE-1 (Compatible Land Uses): To the maximum extent practicable, development project Covered Activities will locate compatible land uses (e.g., designated open space such as parks and ball fields, detention basins, and other land uses with less intensive human activity) in areas immediately adjacent to existing or planned Preserve boundaries. The compatible land use will provide additional buffering of Preserves from potential indirect effects of adjacent urban development. The soil surfaces in a compatible land use area may be re-contoured provided that the soil restrictive layer remains undamaged and most of the soil profile above the restrictive layer remains intact. The Land Use Authority will determine when it is not practicable to locate a compatible land use adjacent to existing or planned Preserve boundaries.*

IV-3(j). *SSHCP EDGE-2 (Single-Loaded Streets): To the maximum extent practicable, the design of Urban Development Covered Activities will locate single-loaded streets adjacent to existing or planned Preserve. The Land Use Authority will determine when single-loaded streets are not practicable.*

IV-3(k). *SSHCP EDGE-3 (Preserve Setbacks): Urban Development Covered Activities constructed adjacent to existing or planned Preserves must establish a minimum 50-foot-wide setback outward from the boundary of any existing Preserve or planned SSHCP Preserve. This minimum 50-foot-wide setback will function as a transition between Urban Development and the Preserve, and must be managed to maintain the natural community of vegetation present in the adjacent Preserve. As much of the setback as possible should remain in the same natural habitat as the Preserve. However, as discussed in Section 5.2.5, Covered Activities in Preserve Setbacks in the UDA, where an existing or planned Preserve is adjacent to an existing roadway (e.g., collectors, arterials, thoroughfares), the 50-foot Preserve Setback will not be required, and any bicycle or pedestrian trail will be established in the road right-of-way. In addition, where a planned roadway crosses an existing or planned Preserve, no Preserve Setback will be required, and any bicycle or pedestrian trail will be established in the road right-of-way.*

IV-3(l). *SSHCP EDGE-3a (Setback Recreational Trails): Trails are best suited outside of the setback; however, certain types of recreational trails or facilities (e.g., benches, trash receptacles, shade structures, fencing) that can be constructed with minimum ground disturbance and in compliance with EDGE-7 may be allowed within a Preserve Setback, as specified in Section 5.2.5, Covered Activities in Preserve Setbacks in the UDA. Preserve Setback design must locate trails on the side nearest development, away from the Preserve boundary. Trails may be permeable*

or semi-permeable hiking trails or paved community trials. The maximum trail width will be 16 feet total, including 2-foot-wide shoulders. Post and cable fencing, split rail, or other open fencing will be installed adjacent to recreation trails to keep pedestrians on the trail.

IV-3(m). *SSHCP EDGE-3b (Setback Firebreaks): If approved by the local authorities, the Preserve Setback trail may also be used as a firebreak. In instances where a trail cannot act as a firebreak, the firebreak will be located between the trail and the Preserve boundary (see Section 5.2.7). Firebreaks allowed inside the setbacks must be created by methods that will not disturb the soil's restrictive layer, such as mowing, minor scraping of surface vegetation, or shallow tilling, to comply with EDGE-7. Firebreak width within Preserve Setbacks is the minimum width needed to comply with applicable local codes.*

IV-3(n). *SSHCP EDGE-3c (Setback Shade Trees and Landscaping): To prevent potential impacts from irrigation water or from accumulation of leaf litter onto the grasslands or vernal pools of a Preserve, planting of shade trees or landscaping vegetation will be limited to the area of the Preserve Setback located between the recreation trail and the adjacent urban development (i.e., away from Preserves).*

- *Only drought-tolerant plant species will be planted. The planting pallet used for Preserve Setback landscaping will not include invasive plant species listed in the California Invasive Plant Council's (Cal-IPC) California Invasive Plant Inventory Database or listed in the Cal-IPC California Invasive Plant Watch List (see http://www.cal-ipc.org/paf/). Any shade trees planted along Preserve Setback trails will be native species that are found in California grasslands and that can survive in the Vernal Pool–Grassland border without long-term irrigation or fertilization (e.g., valley oak, black oak, blue oak, oracle oak). In general, no more than 30 percent of any 1,000-footlong segment of a Preserve Setback trail will have canopy cover from tree plantings (to be consistent with maximum tree densities naturally found within native California grasslands and savanna).*
- *Drip irrigation will be allowed for a maximum of 5 years to establish shade trees or landscape vegetation between the recreation trail and adjacent urban development. The Implementing Entity has the discretion to allow irrigation to continue past 5 years if extenuating circumstances necessitate it (e.g., during a drought) and the continuance of irrigation will not affect the Preserve. Any irrigation systems located within Preserve Setbacks will be inspected quarterly to determine if such systems are affecting soils or vegetation not part of the intended plantings. Irrigation system repairs will be completed immediately if it is determined that the irrigation system is affecting vegetation or soil moisture not part of the intended tree planting.*
- *If, during annual monitoring of the adjacent Preserve (see Chapter 8), adverse indirect effects (e.g., leaf litter accumulation, irrigation runoff, plant encroachment) of the Preserve Setback's planted*

vegetation are detected, then the SSHCP Implementing Entity, the Preserve Manager, and the entity responsible for the Preserve Setback will identify appropriate adaptive management of the Preserve Setback tree or landscape plantings in accordance with the Preserve Setback Easement (see Section 5.2.5 and Chapter 9).

IV-3(o). *SSHCP EDGE-4 (Locate Stormwater Control Outside Preserves): Roads, sidewalks, and other impermeable surfaces of Urban Development Covered Activities adjacent to existing or planned Preserves will slope away from Preserves and Preserve Setbacks or intercept drainage with swales or curbs and gutters to preclude drainage from entering Preserves and Preserve Setbacks. Stormwater flows must be directed away from Preserves and Preserve Setbacks and directed into stormwater control facilities inside the development (outside Preserves and Preserve Setbacks)18 (see EDGE-6 for exception to EDGE-4 in certain SSHCP Linkage Preserves).*

IV-3(p). *SSHCP EDGE-5 (Stormwater Control in Preserve Setbacks): If trails are established in any Preserve Setback in compliance with EDGE-3, the trail must be sloped away from the Preserve, and rainwater leaving the trail surface must flow into an adjacent low velocity bio-retention swale or cell to keep rainwater runoff and trail contaminants from entering the Preserve. Low-velocity bio-retention swales or cells are typically small linear features placed on one or both sides of a trail. As required by EDGE-3, trails and their adjacent bio-retention swales or cells must be located on the side of the Preserve Setback nearest development. 18 Detention basins are allowed in some Linkage Preserves consistent with the requirements of EDGE-6. At the time of SSHCP preparation, seven Linkage Preserves with drainages are planned SSHCP Preserves: L1, L2, L4, L7, L8, L9, and L10 (see Section 5.2.7 and Section 7.5). Also see project-specific measures in Section 5.5.1.*

IV-3(q). *SSHCP EDGE-6 (Detention Basins in Linkage Preserves): Because planned SSHCP Linkage Preserves L1, L2, L4, L7, L8, L9, and L10 (see Section 7.5) surround natural creeks or streams that must receive stormwater from planned adjacent Urban Development Covered Activities, a limited number of stormwater detention basins will be allowed on those Linkage Preserves. Detention basins within Linkage Preserves (see Section 5.2.7) will be designed and constructed with fill material to build up the perimeter of the detention basin so as not to impact the soil restrictive layer (duripan or hardpan) and function of the soil perched aquifer. Detention basins within Linkage Preserves will capture stormwater flows and runoff, and will discharge water to the stream/creek or percolate collected water to the soil perched aquifer. Detention basin structures that collect stormwater entering the basin or convey stormwater leaving the basin must be designed to avoid and minimize effects to Covered Species habitat in the Linkage Preserve.*

IV-3(r). *SSHCP EDGE-7 (Hardpan/Duripan Protection): To protect the soil perched aquifer and the microwatersheds supporting existing vernal pool hydrology, activities that have the potential to cut into, disrupt, or remove the soil's*

restrictive layer (hardpan or duripan) will not occur within Preserves or Preserve Setbacks. However, in certain circumstances, the Covered Activities defined in Section 5.2.6, Covered Activities in Stream Setbacks in the UDA, and Section 5.2.8, Covered Activities in the Laguna Creek Wildlife Corridor of the Preserve System, may result in punctures19 or other minor disruptions of the soil hardpan or duripan if approved by the Implementing Entity and the Technical Advisory Committee according to the process described in Chapter 9 of the SSHCP. If a Covered Activity on a Preserve or Preserve Setback results in a puncture or other disruption to the soil hardpan or duripan, the puncture will be sealed using bentonite clay or other material that maintains the functionality of the soil's restrictive layer and associated perched aquifer.

IV-3(s). *SSHCP EDGE-8 (Outdoor Lighting): All outdoor lighting in Urban Development Covered Activity projects will be designed to minimize light pollution into existing and planned Preserves, except where a Land Use Authority Permittee determines lighting is necessary for public safety or security. Minimization measures may include light fixture placement (e.g., as low to the ground as possible), lamp designs (e.g., shielding, low glare, or no lighting), directing light away from Preserves, or other means to avoid or minimize light pollution. The Third-Party Project Proponent will use the best information available at the time of project design to minimize effects of light pollution on target SSHCP Covered Species (e.g., western spadefoot (Spea 19 Punctures may include small holes that penetrate the soil hardpan or duripan such as might occur when digging or drilling holes for the installation of fence posts, sign posts, or trees. Final South Sacramento Habitat Conservation Plan 7384 5-73 February 2018 hammondii), Valley elderberry longhorn beetle (Desmocerus californicus dimorphus), and Ricksecker's water scavenger beetle (Hydrochara ricksecker)).*

IV-3(t). *SSHCP EDGE-9 (Livestock Access to Preserves): Urban Development Covered Activity projects that include on-site Preserves will include in their design an adequate number of access points and facilities for delivery and pick up of grazing animals (livestock), such that these activities will not significantly alter the Preserve's habitat and are consistent with the protection of livestock and protection of adjacent public property, and include adequate public safety measures.*

IV-3(u). *SSHCP EDGE-10 (Prevent Invasive Species Spread): Completed Covered Activities (including roads) will be maintained in a manner that avoids the spread of invasive species into Preserve and Open Space areas. Such maintenance measures will include the following:*

- *To prevent the transport of non-native invasive species onto Preserves, before bringing any equipment onto an SSHCP Preserve or Preserve Setback, equipment must be cleaned of mud, dirt, and plant material. Cleaning will occur in the infested area or another appropriate location as approved by a Plan Permittee.*
- *Mowing rotation will start in un-infested areas and move to infested areas.*

- *Invasive plant prevention techniques will be incorporated into maintenance plans.*
- *The SSHCP Implementing Entity will survey road shoulders, ditches, and rights-of-way that border SSHCP Preserves for invasive weeds or other exotic plant species. Where roadside weed infestations have reached a critical control point, the Implementing Entity or Land Use Authority Permittee will apply the appropriate manual, mechanical, or chemical treatment.*

IV-3(v). *SSHCP BMP-1 (Construction Fencing): Orange construction fencing will be installed to ensure that ground disturbance does not extend beyond the allowed construction footprint (i.e., the limit of project construction plus equipment staging areas and access roads). Plan Permittees and Third-Party Project Proponents implementing ground disturbing Covered Activities will mark the outer boundary of any Preserve Setback or Stream Setback adjacent to or within the project site with orange construction fencing prior to ground disturbance. This fencing will remain in place until project completion, as identified by the Plan Permittee. Final South Sacramento Habitat Conservation Plan 7384 5-74 February 2018*

IV-3(w). *SSHCP BMP-2 (Erosion Control): Plan Permittees and Third-Party Project Proponents implementing ground disturbing Covered Activities will install temporary control measures for sediment, stormwater, and pollutant runoff as required by the Plan Permittee to protect water quality and species habitat. Silt fencing or other appropriate sediment control device(s) will be installed downslope of any Covered Activity that disturbs soils. Fiber rolls and seed mixtures used for erosion control will be certified as free of viable noxious weed seed. As discussed in Section 5.4.2, Covered Species Take Avoidance and Minimization Measures, erosion controls installed in or adjacent to Plan Area modeled habitat for giant garter snake (Thamnophis gigas), western pond turtle (Actinemys marmorata), California tiger salamander (California tiger salamander), or western spadefoot (see Chapter 3) must be of appropriate design and materials that will not entrap the species (e.g., not contain mesh netting). Regular monitoring and maintenance of the project's erosion control measures will be conducted until project completion to ensure effective operation of erosion control measures.*

IV-3(x). *SSHCP BMP-3 (Equipment Storage and Fueling): Plan Permittees and Third-Party Project Proponents implementing ground-disturbing Covered Activities will ensure that equipment storage and staging will occur in the development footprint only (not sited in any existing on-site Preserve, planned on-site Preserve, Preserve Setback, Stream Setback, or aquatic land cover type). Fuel storage and equipment fueling will occur away from waterways, stream channels, stream banks, and other environmentally sensitive areas within the development footprint. However, certain equipment storage and fueling activities can be allowed on Preserves within habitat re-establishment/establishment sites (refer to Section 5.2.7) if no location outside of the site is available. If a Covered Activity results in a spill of fuel, hydraulic fluid, lubricants, or other petroleum products, the spill will be absorbed and waste disposed of in a manner to prevent*

pollutants from entering a waterway, Preserve, Preserve Setback, or Stream Setback.

IV-3(y). *SSHCP BMP-4 (Erodible Materials): Plan Permittees and Third-Party Project Proponents implementing Covered Activities must not deposit erodible materials into waterways. Vegetation clippings, brush, loose soils, or other debris material will not be stockpiled within stream channels or on adjacent banks. Erodible material must be disposed of such that it cannot enter a waterway, Preserve, Preserve Setback, Stream Setback, or aquatic land cover type. If water and sludge must be pumped from a subdrain or other structure, the material will be conveyed to a temporary settling basin to prevent sediment from entering a waterway.*

IV-3(z). *SSHCP BMP-5 (Dust Control): Plan Permittees and Third-Party Project Proponents implementing ground-disturbing Covered Activities will water active construction sites regularly, if warranted, to avoid or minimize impacts from construction dust on adjacent vegetation and wildlife habitats. No surface water will be used from aquatic land covers; water will be obtained from a municipal source or existing groundwater well.*

IV-3(aa). *SSHCP BMP-6 (Construction Lighting): Plan Permittees and Third-Party Project Proponents implementing ground-disturbing Covered Activities will direct all temporary construction lighting (e.g., lighting used for security or nighttime equipment maintenance) away from adjacent natural habitats, and particularly Riparian and Wetland habitats and wildlife movement areas.*

IV-3(bb). *SSHCP BMP-7 (Biological Monitor): If a Covered Activity includes ground disturbance within Covered Species modeled habitat, an approved biologist will be on site during the period of ground disturbance, and may need to be on site during other construction activities depending on the Covered Species affected. After ground disturbing project activities are complete, the approved biologist will train an individual to act as the on-site construction monitor for the remainder of construction, with the concurrence of the Permitting Agencies. The on-site monitor will attend the training described in BMP-8. The approved biologist and the on-site monitor will have oversight over implementation of Avoidance and Minimization Measures, and will have the authority to stop activities if any of the requirements associated with those measures are not met. If the monitor requests that work be stopped, the Wildlife Agencies will be notified within one working day by email. The approved biologist and/or on-site monitor will record all observations of listed species on California Natural Diversity Database field sheets and submit them to the California Department of Fish and Wildlife. The approved biologist or on-site monitor will be the contact source for any employee or contractor who might inadvertently kill or injure a Covered Species or who finds a dead, injured or entrapped individual. The approved biologist and on-site monitor's names and telephone numbers will be provided to the Wildlife Agencies prior to the initiation of ground-disturbing activities. Refer to species-specific measures for details on requirements for biological monitors.*

IV-3(cc). SSHCP BMP-8 (Training of Construction Staff): A mandatory Worker Environmental Awareness Program will be conducted by an approved biologist for all construction workers, including contractors, prior to the commencement of construction activities. The training will include how to identify Covered Species that might enter the construction site, relevant life history information and habitats, SSHCP and statutory requirements and the consequences of non-compliance, the boundaries of the construction area and permitted disturbance zones, litter control training (SPECIES-2), and appropriate protocols if a Covered Species is encountered. Supporting materials containing training information will be prepared and distributed by the approved biologist. When necessary, training and supporting materials will also be provided in Spanish. Upon completion of training, construction personnel will sign a form stating that they attended the training and understand all of the Avoidance and Minimization Measures. Written documentation of the training must be submitted to the Implementing Entity within 30 days of completion of the training, and the Implementing Entity will provide this information to the Wildlife Agencies.

IV-3(dd). SSHCP BMP-9 (Soil Compaction): After construction is complete, all temporarily disturbed areas will be restored similar to pre-project conditions, including impacts relating to soil compaction, water infiltration capacity, and soil hydrologic characteristics.

IV-3(ee). SSHCP BMP-10 (Revegetation): Plan Permittees and Third-Party Project Proponents implementing ground-disturbing Covered Activities will revegetate any cut-and-fill slopes with native or existing non-invasive, non-native plants (e.g., non-native grasses) suitable for the altered soil conditions and in compliance with EDGE-2 and EDGE-8, if applicable.

IV-3(ff). SSHCP BMP-11 (Speed Limit): Project-related vehicles will observe the posted speed limits on paved roads and a 10-mile-per-hour speed limit on unpaved roads and during travel in project areas. Construction crews will be given weekly tailgate instruction to travel only on designated and marked existing, cross-country, and project-only roads.

IV-3(gg). SSHCP ROAD-1 (Road Project Location): Road projects will be located in the least environmentally sensitive area to avoid, to the maximum extent practicable, impacts on Covered Species, Covered Species habitat, and waters of the United States. Road project alignments will follow existing roads, road easements, and rights-of-way, or be sited in disturbed areas to minimize habitat loss and additional habitat fragmentation.

IV-3(hh). SSHCP ROAD-2 (Wildlife Crossing Structures): Road projects that are Urban Development Covered Activities (see Section 5.2.1) (including the Capital Southeast Connector, see Section 5.2.1.1) or are Rural Transportation Covered Activities (see Section 5.2.3) will include an adequate number of wildlife crossing structures, as depicted in Figure 5-10. An adequate number of wildlife crossing structures within the Urban Development Area (UDA) and outside the UDA will provide for continued dispersal and movement of native wildlife throughout the SSHCP Plan Area, as required by the SSHCP Biological Goals and Objectives (see

Chapter 7). The Plan defines "wildlife crossing structure" as a physical structure specifically designed or retrofitted to facilitate undercrossing for target wildlife species. The Plan further classifies wildlife crossings as hydrologic crossings and dry crossings. Hydrologic crossings are built where there is an existing stream, creek, or intermittent drainage to maintain existing hydrologic connectivity within the Plan Area. As described below, hydrologic crossings require specialized features to be built into the crossing structure, such as elevated platforms to allow wildlife to pass under a crossing structure when it is inundated with water. Dry wildlife crossings are built where there is no hydrologic feature but where a crossing is needed to provide for overland connectivity. SSHCP wildlife crossing structures may include structures such as bridges, arches, or box and pipe culverts. Plan Permittees expect that future wildlife movement and dispersal within the UDA will occur almost entirely within the boundaries of the future interconnected SSHCP Preserve System (see Section 7.5). Therefore, wildlife crossings are needed wherever a roadway crosses (bisects) the conceptual SSHCP Preserve System (see Figure 5-10). Wildlife crossing structures inside the UDA will be sized to accommodate movement of a highly mobile native indicator species (i.e., coyote (Canis latrans)). By designing UDA wildlife crossing structures to meet the movement and dispersal requirements of coyote, the Plan Permittees anticipate that the crossing structure will also accommodate most native wildlife species that currently occupy the UDA (see Chapter 3). The Plan Permittees expect that most of the Plan Area outside of the UDA will remain as Open Space over the 50-year Permit Term (see Chapter 4). Therefore, Final South Sacramento Habitat Conservation Plan 7384 5-78 February 2018 the Plan Permittees expect that the Rural Transportation Project Covered Activities proposed outside the UDA will have a relatively small effect on the movement and dispersal of larger or more mobile native wildlife species, including coyote. Consequently, the Plan Permittees anticipate that the design of Rural Transportation Project Covered Activities outside the UDA will need to include wildlife crossing structures primarily where the Rural Transportation Project Covered Activities occur within California tiger salamander modeled habitat (see CTS-3 and also Chapter 3, Figure 3-16). The design and location of wildlife crossing structures both inside the UDA and outside the UDA will be determined by collaboration between the Third-Party Project Proponent, the Land Use Authority, and the Implementing Entity. Crossing design will use the best available scientific and commercial information for the target species. The design of crossing structures will be based on demonstrated effectiveness of design for the target species when such information is available, or will be designed with a high level of certainty of success based on studies of similar taxa in similar environmental settings. The proposed wildlife crossing structures designs will be reviewed and approved by the Implementing Entity prior to final design. The Implementing Entity will develop a Wildlife Crossing Maintenance Manual to be provided to the entity responsible for maintaining the wildlife crossing. The Wildlife Crossing Maintenance Manual will identify vegetation management, clearing of obstructions, and other techniques to maintain the desired movement and hydrologic connectivity, and to avoid effects to adjacent

Preserves. All SSHCP wildlife crossing structures in the UDA will include the following design elements:

- *Open-bottom bridges or arches where the roadway crosses a river or stream. Where an open-bottom bridge or arch is used, the span of the crossing will be at least 1.2 times the bankfull width of the stream and span the banks to allow for dry wildlife passage along each side of the stream and to avoid or minimize piers or footings within the stream. (Bankfull width refers to the width of a stream channel at the point where over-bank flow begins during a flood event.)*
- *Any wildlife crossing structure that also maintains hydrologic connectivity will be designed to maintain pre-construction water capacity, depth, and velocity. The crossing structure will not restrict or impede normal flows or flood flows, unless a primary purpose of the structure is to manage such flow(s). Wildlife crossing structures must be designed to provide a dry passage (e.g., a platform ledge) higher than flows for a 10-year storm event to allow wildlife to pass through an inundated crossing structure.*
- *Wildlife crossing structures in the UDA will be designed and sized to accommodate movement of at least medium-sized mammals (e.g., coyote). The opening must be at least 3 feet high and the crossing structure must have a minimum openness ratio of at least 0.4.*
- *Vegetation leading up to the entrance of a crossing structure and the substrate leading into and within the crossing structure will be natural and appropriate to provide for continuity of habitat, attract the target animal species for which the crossing is designed, and facilitate use of the crossing structure.*
- *A wildlife crossing under six-lane roads or larger will be designed to provide ambient light and temperature in the longer crossing structures (e.g., either by providing a larger opening or a grate at the top of the structure to improve the attractiveness of the crossing to certain Covered Species and wildlife that may hesitate to cross through dark, confined structures or one with a temperature gradient (Jackson and Griffin 2000)). If a road is less than six lanes in width, these designs will be optional.*
- *Lighting will not be placed at or near the entrance of a wildlife crossing structure to maintain natural ambient light conditions at night and to increase chances of wildlife use. However, a Land Use Authority Permittees may allow lighting if necessary for human health or safety. Outside the UDA, wildlife crossing structures may be required for California tiger salamander (refer to CTS-1), and could also be required for other native species.*

IV-3(ii). *SSHCP ROAD-3 (Roadside Pesticide Use20): If pesticide use is necessary along roadsides, the appropriate SSHCP Permittee will ensure that the pesticide application strictly complies with the pesticide label and all other applicable federal, state, and local authorities pertaining to the use, safety, storage, disposal, and reporting of the pesticide. Where roadside weed*

infestations have reached a critical control point, the Implementing Entity or a Land Use Authority Permittee will apply the appropriate manual, mechanical, or chemical treatment. In addition, the Implementing Entity or appropriate Land Use Authority Permittee will post signs along road shoulders adjacent to sensitive areas that are within the SSHCP 20 Use of pesticides (including rodenticides and herbicides) is not an SSHCP Covered Activity. However, pesticide use specified in Section 5.3 is an allowed land management tool, provided the pesticide application is otherwise legal and conforms to all conditions in Section 5.4. Final South Sacramento Habitat Conservation Plan 7384 5-80 February 2018 Preserve System (e.g., California tiger salamander breeding ponds, endemic plant populations, vertebrates that rely on insects for part of their diet). The signs will identify pesticide use restrictions or other roadside maintenance restrictions.

IV-3(jj). *SSHCP NATURE TRAIL-1 (Nature Trail Plan): A nature trail plan must be prepared for each Preserve where a trail is allowed by the Preserve Management Plan. Nature trails will be unpaved trails that vary in width depending on terrain and existing constraints, but will never exceed 4 feet in width. Where a trail crosses a swale, wooden walkways elevated to a height no greater than 2 feet will be installed. Trail improvements may include mowing vegetation to create or maintain a trail, minor grading to remove trip hazards, and signs providing directional and educational information. Public access to land acquired for preservation will be prohibited until a trail plan can be prepared by the Implementing Entity and approved by the Permitting Agencies. A trail plan will include the following:*

- *Maps identifying areas that contain sensitive habitats or species occurrences.*
- *Maps that show the location and footprint of proposed trails.*
- *Methods used to control public access.*
- *Trail and use monitoring methods, schedules, and responsibilities.*
- *Trail operation and maintenance guidelines and responsibilities.*
- *Clear triggers for use restrictions or closure based on sensitive biological indicators (e.g., seasonal closures of some trails on the basis of activity periods of Covered Species or sensitive species).*

IV-3(kk). *SSHCP NATURE TRAIL-2 (Nature Trail Protection of Duripan): Nature trails will be sited and constructed so as not to interfere with existing soil duripan and the perched aquifer that support the existing hydrologic regime of the Vernal Pool–Grassland, and will not interfere with existing pool hydrology. Trails within Preserves will not be paved.*

IV-3(ll). *SSHCP NATURE TRAIL-3 (Nature Trail Location): Nature trails will be located away from sensitive natural resources (e.g., vernal pools, riparian habitat, woodland habitat, Covered Species occurrences, raptor nesting sites, tricolored blackbird (Agelaius tricolor) colony sites). The Wildlife Agencies will determine the distance necessary to avoid impacts to sensitive natural resources.*

IV-3(mm). *SSHCP NATURE TRAIL-4 (Biological Studies Prior to Nature Trail Design): Biological studies will be conducted within the area being considered for nature trail construction prior to project design. The studies will include land cover type mapping and focused species surveys and/or wetland delineations. The biological studies will include assessments of potential effects of trail construction on Preserve System resources, and recommendations for avoidance and minimization that may be incorporated into project siting, design, construction, and operation.*

IV-3(nn). *SSHCP NATURE TRAIL-5 (Monitoring of Nature Trail Impacts): Impacts that could result from use of a nature trail within a Preserve will be monitored according to the Preserve Management Plan (Chapter 8) to ensure that uses do not conflict with the individual Preserve Management Plan. If use of a trail is found to conflict with the individual Preserve Management Plan, use of that trail will be discontinued until adjustments in the use can be made to reduce or eliminate conflicts. The Implementing Entity will make decisions about discontinuing or modifying use of a trail in consultation with the Preserve Manager or other applicable Preserve management agency or organization.*

Special-Status Plants

IV-4(a). *SSHCP PLANT-1 (Rare Plant Surveys): If a Covered Activity project site contains modeled habitat for Ahart's dwarf rush (Juncus leiospermus var. ahartii), Bogg's Lake hedge-hyssop (Gratiola heterosepala), dwarf downingia (Downingia pusilla), legenere (Legenere limosa), pincushion navarretia (Navarretia myersii), or Sanford's arrowhead (Sagittaria sanfordii), the Covered Activity project site shall be surveyed for the rare plant by an approved biologist and following the California Department of Fish and Wildlife (CDFW) rare plant survey protocols (CDFG 2009) or the most recent CDFW rare plant survey protocols. An approved biologist shall conduct the field surveys and shalll identify and map plant species occurrences according to the protocols. See Chapter 10 of the SSHCP for the process to submit survey information to the Plan Permittee and the Permitting Agencies. (SSHCP 2018). If rare plants are not found during surveys, the additional mitigation measures for special-status plants are not necessary.*

IV-4(b). *SSHCP PLANT-2 (Rare Plant Protection): If a rare plant listed in Mitigation Measure IV-1(a) is detected within an area proposed to be disturbed by a Covered Activity or is detected within 250 feet of the area proposed to be disturbed by a Covered Activity, the Implementing Entity shall assure one unprotected occurrence of the species is protected within a SSHCP Preserve before any ground disturbance occurs on the project site (SSHCP 2018).*

IV-4(c). *If non SSHCP-covered special-status plant species are determined to be present during the survey, a mitigation plan shall be prepared for review and approval by the City. Depending on the listing status of the plant, appropriate mitigation will be determined and may include avoidance, transplantation, or inoculation (if species are present in wetland habitats).*

Avoided areas containing special-status plants shall be fenced with orange construction fencing during Project implementation.

California Tiger Salamander

IV-5(a). *SSHCP CTS-1 (California Tiger Salamander Daily Construction Schedule): Ground-disturbing Covered Activities within California tiger salamander modeled habitat (Figure 3-16 [of the SSHCP]) shall occur outside the breeding and dispersal season (occur after July 31 and before October 15), to the maximum extent practicable. If Covered Activities must be implemented in modeled habitat (Figure 3-16 [of the SSHCP]) during the breeding and dispersal season (after October 15 and before July 31), construction activities shall not start until 30 minutes after sunrise and must be complete 30 minutes prior to sunset.*

IV-5(b). *SSHCP CTS-2 (California Tiger Salamander Exclusion Fencing): If a Covered Activity must be implemented in modeled habitat (Figure 3-16 [of the SSHCP]) during the breeding and dispersal season (after October 15 and before July 31), exclusion fencing shall be installed around the project footprint before October 15. Temporary high-visibility construction fencing shall be installed along the edge of work areas, and exclusion fencing shall be installed immediately outside of the temporary high-visibility construction fencing to exclude California tiger salamanders from entering the construction area or becoming entangled in the construction fencing. Exclusion fencing shall be at least 1 foot tall and be buried at least 6 inches below the ground to prevent salamanders from going under the fencing. Fencing shall remain in place until all construction activities within the construction area are complete. No project activities shall occur outside the delineated project footprint. An approved biologist must inspect the exclusion fencing and project site every morning before 7:00 a.m. for integrity and for any entrapped California tiger salamanders. If a California tiger salamander is encountered, refer to CTS- 5 [Mitigation Measure IV-2(e)], below. (However, the Implementing Entity may, with approval of the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW), determine that it is appropriate for a Covered Activity project to not implement CTS-2 [Mitigation Measure IV-2(b)] for certain long and linear roadway Covered Activity projects if it appears that the exclusion fencing shall likely trap individuals or cause more take of California tiger salamander than it would prevent).*

IV-5(c). *SSHCP CTS-3 (California Tiger Salamander Monitoring): If Covered Activities must be implemented in modeled habitat (Figure 3-16 [of the SSHCP]), an approved biologist experienced with California tiger salamander identification and behavior shall monitor the project site, including the integrity of any exclusion fencing. The approved biologist shall be on site daily while construction-related activities are taking place, and shall inspect the project site for California tiger salamander every morning before 7:00 a.m., or prior to construction activities. As required by BMP-8 (Training of Construction Staff), the approved biologist shall also train construction personnel on the required California tiger salamander avoidance procedures, exclusion fencing, and correct protocols in the event that a California tiger salamander enters an active construction zone.*

If a California tiger salamander is encountered, refer to CTS-5 [Mitigation Measure IV-2(e)], below.

IV-5(d). *SSHCP CTS-4 (Avoid California Tiger Salamander Entrapment): If Covered Activities must be implemented in modeled habitat, all excavated steep-walled holes or trenches more than 6 inches deep shall be covered with plywood (or similar material) or provided with one or more escape ramps constructed of earth fill or wooden planks at the end of each work day or 30 minutes prior to sunset, whichever occurs first. All steep-walled holes or trenches shall be inspected by the approved biologist each morning to ensure that no wildlife has become entrapped. All construction pipes, culverts, similar structures, construction equipment, and construction debris left overnight within California tiger salamander modeled habitat shall be inspected for California tiger salamanders by the approved biologist prior to being moved. If a California tiger salamander is encountered, refer to CTS-5 [Mitigation Measure IV-2(e)], below.*

IV-5(e). *SSHCP CTS-5 (California Tiger Salamander Encounter Protocol): If a California tiger salamander is encountered during construction activities, the approved biologist shall notify the Wildlife Agencies immediately (California Department of Fish and Wildlife (CDFW) and U.S. Fish and Wildlife Service (USFWS)). Construction activities shall be suspended in a 100-foot radius of the animal until the animal is relocated by an approved biologist with appropriate handling permits from the Wildlife Agencies. Prior to relocation, the approved biologist shall notify the Wildlife Agencies to determine the appropriate procedures related to relocation. If the animal is handled, a report shall be submitted, including date(s), location(s), habitat description, and any corrective measures taken to protect the salamander, within 1 business day to the Wildlife Agencies. The biologist shall report any take of listed species to USFWS and CDFW immediately. Any worker who inadvertently injures or kills a California tiger salamander or who finds dead, injured, or entrapped California tiger salamander(s) must immediately report the incident to the approved biologist.*

IV-5(f). *SSHCP CTS-6 (Erosion Control Materials in California Tiger Salamander Habitat): If erosion control (BMP-2) is implemented within California tiger salamander modeled habitat (Figure 3-16 [of the SSHCP]), non-entangling erosion control material shall be used to reduce the potential for entrapment. Tightly woven fiber netting (mesh size less than 0.25 inch) or similar material shall be used to ensure that salamanders are not trapped (no monofilament). Coconut coir matting and fiber rolls with burlap are examples of acceptable erosion control materials. This limitation shall be communicated to the contractor through use of special provisions included in the bid solicitation package.*

IV-5(g). *SSHCP CTS-7 (Rodent Control): CTS-7 [Mitigation Measure IV-2(g)] only applies to projects that are within California tiger salamander modeled habitat (Figure 3-16 [of the SSHCP]) and on Covered Activities. Rodent control shall be allowed only in developed portions of a Covered Activity project site. Where rodent control is allowed, the method of rodent control shall comply with the methods of rodent control discussed in the 4(d) Rule*

published in the U.S. Fish and Wildlife Service's (2004) final listing rule for tiger salamander.

Western Spadefoot

IV-6(a). *SSHCP WS-1 (Western Spadefoot Work Window): Ground-disturbing Covered Activities within western spadefoot modeled habitat (Figure 3-17) will occur outside the breeding and dispersal season (after May 15 and before October 15), to the maximum extent practicable.*

IV-6(b). *SSHCP WS-2 (Western Spadefoot Exclusion Fencing): If Covered Activities must be implemented in modeled habitat (Figure 3-17) after October 15 and before May 15, exclusion fencing will be installed around the project footprint before October 15, and the project site must be monitored by an approved biologist following rain events. Temporary high-visibility construction fencing will be installed along the edge of work areas, and silt fencing will be installed immediately behind the temporary high-visibility construction fencing to exclude western spadefoot from entering the construction area. Fencing will remain in place until all construction activities within the construction area are completed. No project activities will occur outside the delineated project footprint. If a western spadefoot is encountered, refer to WS-6, below.*

IV-6(c). *SSHCP WS-3 (Western Spadefoot Monitoring): If Covered Activities must be implemented in modeled habitat (Figure 3-17) in the breeding and dispersal season (after October 15 and before May 15), an approved biologist experienced with western spadefoot identification and behavior will monitor the project site, including the integrity of any exclusion fencing. The approved biologist will be on site daily while construction-related activities are taking place, and will inspect the project site daily for western spadefoot prior to construction activities. The approved biologist will also train construction personnel on the required avoidance procedures, exclusion fencing, and protocols in the event that a western spadefoot enters an active construction zone (i.e., outside the buffer zone). If a western spadefoot is encountered, refer to WS-6, below.*

IV-6(d). *SSHCP WS-4 (Avoid Western Spadefoot Entrapment): If a Covered Activity occurs in western spadefoot modeled habitat (Figure 3-17), all excavated steep-walled holes and trenches more than 6 inches deep will be covered with plywood (or similar material) or provided with one or more escape ramps constructed of earth fill or wooden planks at the end of each work day or 30 minutes prior to sunset, whichever occurs first. All steep-walled holes and trenches will be inspected by the approved biologist each morning to ensure that no wildlife has become entrapped. All construction pipes, culverts, similar structures, construction equipment, and construction debris left overnight within western spadefoot modeled habitat will be inspected for western spadefoot by the approved biologist prior to being moved. If a western spadefoot is encountered, refer to WS-6, below.*

IV-6(e). *SSHCP WS-5 (Erosion Control Materials in Western Spadefoot Habitat): If erosion control (BMP-2) is implemented within western spadefoot modeled habitat (Figure 3-17), non-entangling erosion control material will be used*

to reduce the potential for entrapment. Tightly woven fiber netting (mesh size less than 0.25 inch) or similar material will be used to ensure that western spadefoots are not trapped (no monofilament). Coconut coir matting and fiber rolls containing burlap are examples of acceptable erosion control materials.

IV-6(f). *SSHCP WS-6 (Western Spadefoot Encounter Protocol): If Covered Activities must be implemented in modeled habitat (Figure 3-17) during the breeding and dispersal season (after October 15 and before May 15), and a western spadefoot is encountered during construction activities, the approved biologist will notify the Wildlife Agencies immediately. Construction activities will be suspended in a 100-foot radius of the animal until the animal leaves the project site on its own volition. If necessary, the approved biologist will notify the Wildlife Agencies to determine the appropriate procedures related to relocation. If the animal is handled, a report will be submitted, including date(s), location(s), habitat description, and any corrective measures taken to protect the western spadefoot within 1 business day to the Wildlife Agencies. The biologist will report any take of listed species to the U.S. Fish and Wildlife Service and California Department of Fish and Wildlife immediately. Any worker who inadvertently injures or kills a western spadefoot or who finds dead, injured, or entrapped western spadefoot(s) must immediately report the incident to the approved biologist.*

Western Pond Turtle

IV-7(a). *SSHCP WPT-1 (Western Pond Turtle Surveys): If the SSHCP western pond turtle modeled habitat maps (Figure 3-19 [of the SSHCP]) show that modeled habitat for western pond turtle is present within a Covered Activity's project footprint or within 300 feet of a project footprint, then an approved biologist shall conduct a field investigation to delineate western pond turtle aquatic habitat within the project footprint and within 300 feet of the project footprint. In addition to the SSHCP land cover types shown in Figure 3-19 of the SSHCP, western pond turtle aquatic habitat includes, but is not limited to, low-gradient streams and creeks, open water, freshwater marsh, and rice fields. Adjacent parcels under different land ownership shall be surveyed only if access is granted or if the parcels are visible from authorized areas. The Third-Party Proponent shall map all existing or potential sites and provide those maps to the Local Land Use Permittees and the Implementing Entity. Locations of delineated western pond turtle habitat must also be noted on plans that are submitted to a Local Land Use Permittee. The applicant shall use this information to finalize project design. Covered Activities may occur throughout the year as long as western pond turtle habitat is identified and fully avoided. Otherwise, Covered Activities must comply with Mitigation Measure IV-4(b) through IV-4(i).*

IV-7(b). *SSHCP WPT-2 (Western Pond Turtle Work Window): Maintenance and improvements to existing structures may occur throughout the year as long as western pond turtle habitat is identified and avoided, and movement of equipment is confined to existing roads. Otherwise, construction and ground-disturbing Covered Activities must be conducted outside of western pond turtle's active season. Construction and ground-disturbing activities*

shall be initiated after May 1 and shall commence prior to September 15. If it appears that construction activities may go beyond September 15, the appropriate Plan Permittee shall contact the Local Land Use Permittee and the Implementing Entity as soon as possible, but not later than September 1, to determine if additional measures are necessary to minimize take.

IV-7(c). *SSHCP WPT-3 (Western Pond Turtle Monitoring): If a Covered Activity is occurring in western pond turtle modeled habitat (Figure 3-19 [of the SSHCP]), an approved biologist experienced with western pond turtle identification and behavior shall monitor the project site, including the integrity of any exclusion fencing. The approved biologist shall be on site daily while construction-related activities are taking place in aquatic habitat or within 300 feet of aquatic habitat, and shall inspect the project site daily for western pond turtle prior to construction activities. The approved biologist shall also train construction personnel on the required avoidance procedures, exclusion fencing, and protocols in the event that a western pond turtle enters an active construction zone (i.e., outside the buffer zone).*

IV-7(d). *SSHCP WPT-4 (Western Pond Turtle Habitat Dewatering and Exclusion): If construction activities shall occur in western pond turtle aquatic habitat, aquatic habitat for the turtle shall be dewatered and then remain dry and absent of aquatic prey (e.g., crustaceans and other aquatic invertebrates) for 15 days prior to the initiation of construction activities. If complete dewatering is not possible, the Implementing Entity shall be contacted to determine what additional measures may be necessary to minimize effects to western pond turtle. After aquatic habitat has been dewatered 15 days prior to construction activities, exclusion fencing shall be installed extending a minimum of 300 feet into adjacent uplands to isolate both the aquatic and adjacent upland habitat. Exclusionary fencing shall be erected 36 inches above ground and buried at least 6 inches below the ground to prevent turtles from attempting to burrow or move under the fence into the construction area. In addition, high-visibility fencing shall be erected to identify construction limits and to protect adjacent habitat from encroachment of personnel and equipment. Western pond turtle habitat outside construction fencing shall be avoided by all construction personnel. The fencing and work area shall be inspected by the approved biologist to ensure that the fencing is intact and that no turtles have entered the work area before the start of each work day. Fencing shall be maintained by the contractor until completion of the project. If, after exclusion fencing and dewatering, western pond turtles are found within the project footprint or within 300 feet of the project footprint, the project applicant shall discuss the next best steps with the Implementing Entity and Wildlife Agencies.*

IV-7(e). *SSHCP WPT-5 (Avoid Western Pond Turtle Entrapment): If a Covered Activity occurs within western pond turtle modeled habitat (Figure 3-19), all excavated steep- walled holes and trenches more than 6 inches deep shall be covered with plywood (or similar material) or provided with one or more escape ramps constructed of earth fill or wooden planks at the end of each work day or 30 minutes prior to sunset, whichever occurs first. All steep-walled holes and trenches shall be inspected by the approved biologist each morning to ensure that no wildlife has become entrapped. All construction pipes, culverts, similar structures, construction equipment, and construction debris left overnight within western pond turtle modeled*

habitat shall be inspected for western pond turtle by the approved biologist prior to being moved.

IV-7(f). *SSHCP WPT-6 (Erosion Control Materials in Western Pond Turtle Habitat): If erosion control (BMP-2) is implemented within western pond turtle modeled habitat (Figure 3-19 [of the SSHCP]), non-entangling erosion control material shall be used to reduce the potential for entrapment. Tightly woven fiber netting (mesh size less than 0.25 inch) or similar material shall be used to ensure that turtles are not trapped (no monofilament). Coconut coir matting and fiber rolls containing burlap are examples of acceptable erosion control materials.*

IV-7(g). *SSHCP WPT-7 (Western Pond Turtle Modeled Habitat Speed Limit): Covered Activity construction and maintenance vehicles shall observe a 20-mile-per-hour speed limit within western pond turtle modeled upland habitat (Figure 3-19 [of the SSHCP]).*

IV-7(h). *SSHCP WPT-8 (Western Pond Turtle Encounter Protocol): If a western pond turtle is encountered during construction activities, the approved biologist shall notify the Wildlife Agencies immediately. Construction activities shall be suspended in a 100-foot radius of the animal until the animal leaves the project site on its own volition. If necessary, the approved biologist shall notify the Wildlife Agencies to determine the appropriate procedures related to relocation. If the animal is handled, a report will be submitted, including date(s), location(s), habitat description, and any corrective measures taken to protect the turtle, within 1 business day to the Wildlife Agencies. The biologist shall report any take of listed species to the U.S. Fish and Wildlife Service immediately. Any worker who inadvertently injures or kills a western pond turtle or who finds one dead, injured, or entrapped must immediately report the incident to the approved biologist.*

IV-7(i). *SSHCP WPT-9 (Western Pond Turtle Post-Construction Restoration): After completion of ground- disturbing Covered Activities, the applicant shall remove any temporary fill and construction debris and shall restore temporarily disturbed areas to pre-project conditions. Restoration work includes such activities as re-vegetating the banks and active channels with a seed mix similar to pre-project conditions. Appropriate methods and plant species used to re-vegetate such areas shall be determined on a site-specific basis in consultation with the Implementing Entity. Restoration work may include replanting emergent aquatic vegetation and placing appropriate artificial or natural basking areas in waterways and wetlands. A photo documentation report showing pre- and post-project conditions shall be submitted to the Implementing Entity 1 month after implementation of the restoration.*

Burrowing Owl

IV-8(a). *SSHCP WBO-1 (Western Burrowing Owl Surveys): Surveys within modeled habitat are required for both the breeding and non-breeding season. If the project site falls within modeled habitat [as is the case for the proposed project], an approved biologist shall survey the project site and map all burrows, noting any burrows that may be occupied. Occupied burrows are often (but not always) indicated by tracks, feathers, egg shell*

fragments, pellets, prey remains, and/or excrement. Surveying and mapping shall be conducted by the approved biologist while walking transects throughout the entire project site plus all accessible areas within a 250-foot radius from the project site. The centerline of these transects shall be no more than 50 feet apart and shall vary in width to account for changes in terrain and vegetation that can preclude complete visual coverage of the area. For example, in hilly terrain with patches of tall grass, transects shall be closer together, and in open areas with little vegetation, they can be 50 feet apart. This methodology is consistent with current survey protocols for this species (California Burrowing Owl Consortium 1993). Adjacent parcels under different land ownership shall be surveyed only if access is granted or if the parcels are visible from authorized areas. If suitable habitat is identified during the initial survey, and if the project does not fully avoid the habitat, pre-construction surveys shall be required. Burrowing owl habitat is fully avoided if project-related activities do not impinge on a 250-foot buffer established by the approved biologist around suitable burrows.

IV-8(b). *SSHCP WBO-2 (Western Burrowing Owl Pre-Construction Surveys): Prior to any Covered Activity ground disturbance, an approved biologist shall conduct pre-construction surveys in all areas that were identified as suitable habitat during the initial surveys. The purpose of the pre-construction surveys is to document the presence or absence of burrowing owls on the project site, particularly in areas within 250 feet of construction activities. To maximize the likelihood of detecting owls, the pre-construction survey shall last a minimum of 3 hours. The survey shall begin 1 hour before sunrise and continue until 2 hours after sunrise (3 hours total), or begin 2 hours before sunset and continue until 1 hour after sunset. Additional time may be required for large project sites. A minimum of two pre-construction surveys shall be conducted (if owls are detected on the first survey, a second survey is not needed). All owls observed shall be counted and their location shall be mapped. Surveys shall conclude no more than 2 calendar days prior to construction. Therefore, the Third-Party Project Proponent shall begin surveys no more than 4 days prior to construction (2 days of surveying plus up to 2 days between surveys and construction). To avoid last-minute changes in schedule or contracting that may occur if burrowing owls are found, the Third-Party Project Proponent shall also conduct a preliminary survey up to 15 days before construction. This preliminary survey shall count as the first of the two required surveys as long as the second survey concludes no more than 2 calendar days in advance of construction (SSHCP 2018). If burrowing owls are not found during the preconstruction surveys, Mitigation Measures IV-4(c) through IV-4 (f) and IV-4 (h) below are not necessary.*

IV-8(c). *SSHCP WBO-3 (Western Burrowing Owl Avoidance): If western burrowing owl or evidence of western burrowing owl is observed on the project site or within 250 feet of the project site during pre-construction surveys, then the following shall occur:*

During Breeding Season: If the approved biologist finds evidence of western burrowing owls within a project site during the breeding season

(February 1 through August 31), all project-related activities shall avoid nest sites during the remainder of the breeding season or while the nest remains occupied by adults or young (nest occupation includes individuals or family groups foraging on or near the site following fledging). Avoidance is establishment of a minimum 250-foot buffer zone around nests. Construction and other project-related activities may occur outside of the 250-foot buffer zone. Construction and other project-related activities may be allowed inside of the 250-foot non-disturbance buffer during the breeding season if the nest is not disturbed, and the Third-Party Project Proponent develops an avoidance, minimization, and monitoring plan that is approved by the Implementing Entity and Wildlife Agencies prior to project construction based on the following criteria:

- *The Implementing Entity and Wildlife Agencies approve of the avoidance and minimization plan provided by the project applicant.*
- *An approved biologist monitors the owls for at least 3 days prior to construction to determine baseline nesting and foraging behavior (i.e., behavior without construction).*
- *The same approved biologist monitors the owls during construction and finds no change in owl nesting and foraging behavior in response to construction activities.*

If there is any change in owl nesting and foraging behavior as a result of construction activities, the approved biologist shall have authority to shut down activities within the 250-foot buffer. Construction cannot resume within the 250-foot buffer until any owls present are no longer affected by nearby construction activities, and with written concurrence from the Wildlife Agencies.

If monitoring by the approved biologist indicates that the nest is abandoned prior to the end of nesting season and the burrow is no longer in use, the non-disturbance buffer zone may be removed if approved by the Wildlife Agencies. The approved biologist shall excavate the burrow in accordance with the latest California Department of Fish and Wildlife guidelines for burrowing owl to prevent reoccupation after receiving approval from the Wildlife Agencies.

The Implementing Entity and Wildlife Agencies shall respond to a request from the Third-Party Project Proponent to review the proposed construction monitoring plan within 21 days.

During Non-Breeding Season: During the non-breeding season (September 1 through January 31), the approved biologist shall establish a minimum 250-foot non-disturbance buffer around occupied burrows. Construction activities outside of this 250-foot buffer shall be allowed. Construction activities within the non-disturbance buffer shall be allowed if the following criteria are met to prevent owls from abandoning over-wintering sites:

- *An approved biologist monitors the owls for at least 3 days prior to construction to determine baseline foraging behavior (i.e., behavior without construction).*
- *The same approved biologist monitors the owls during construction and finds no change in owl foraging behavior in response to construction activities.*
- *If there is any change in owl foraging behavior as a result of construction activities, the approved biologist shall have authority to shut down activities within the 250-foot buffer.*
- *If the owls are gone for at least 1 week, the Third-Party Project Proponent may request approval from the Implementing Entity and Wildlife Agencies that an approved biologist excavate usable burrows and install one-way exclusionary devices to prevent owls from re-occupying the site. After all usable burrows are excavated, the buffer zone shall be removed and construction may continue.*

Monitoring must continue as described above for the non-breeding season as long as the burrow remains active.

IV-8(d). *SSHCP WBO-4 (Burrowing Owl Construction Monitoring): During construction of Covered Activities, 250-foot construction buffer zones shall be established and maintained around any occupied burrow. An approved biologist shall monitor the site to ensure that buffers are enforced and owls are not disturbed. The approved biologist shall also train construction personnel on avoidance procedures, buffer zones, and protocols in the event that a burrowing owl flies into an active construction zone.*

IV-8(e). *SSHCP WBO-5 (Burrowing Owl Passive Relocation): Passive relocation is not allowed without the express written approval of the Wildlife Agencies. Passive owl relocation may be allowed on a case-by-case basis on project sites during the non-breeding season (September 1 through January 31) with the written approval of the Wildlife Agencies if the other measures described in this condition preclude work from continuing. Passive relocation must be done in accordance with the latest California Department of Fish and Wildlife guidelines for burrowing owl. Passive relocation will only be proposed if the burrow needing to be removed or with the potential to collapse from construction activities is the result of a Covered Activity. If passive relocation is approved by the Wildlife Agencies, an approved biologist can passively exclude birds from their burrows during the non-breeding season by installing one-way doors in burrow entrances. These doors shall be in place for 48 hours to ensure that owls have left the burrow, and then the biologist shall excavate the burrow to prevent reoccupation. Burrows shall be excavated using hand tools only. During excavation, an escape route will be maintained at all times. This may include inserting an artificial structure into the burrow to avoid having materials collapse into the burrow and trap owls inside. Other methods of passive relocation, based on best available science, may be approved by the Wildlife Agencies over the 50-year Permit Term.*

IV-8(f). *SSHCP WBO-6 (Burrowing Owl Timing and Maintenance Activities): All activities adjacent to existing or planned Preserves, Preserve Setbacks, or Stream Setback areas shall be seasonally timed, when safety permits, to avoid or minimize adverse effects on occupied burrows.*

IV-8(g). *SSHCP WBO-7 (Rodent Control): Rodent control shall be allowed only in developed portions of a Covered Activity project site within western burrowing owl modeled habitat. Where rodent control is allowed, the method of rodent control shall comply with the methods of rodent control discussed in the 4(d) Rule published in the U.S. Fish and Wildlife Service's (2004) final listing rule for tiger salamander.*

Cooper's Hawk, Loggerhead Shrike, Northern Harrier, and White-tailed Kite

IV-9(a). *SSHCP RAPTOR-1 (Raptor Surveys): If modeled habitat for a covered raptor species (Figures 3-20, 3-23, 3-24, or 3-28 [of the SSHCP]) is present within a Covered Activity's project footprint or within 0.25-mile of a project footprint (as is the case for the proposed project), then an approved biologist shall conduct a field investigation to determine if existing or potential nesting sites are present within the project footprint and adjacent areas within 0.25 mile of the project footprint. Adjacent parcels under different land ownership shall be surveyed only if access is granted or if the parcels are visible from authorized areas. The Third-Party Project Proponent shall map all existing or potential nesting sites and provide these maps to the Local Land Use Permittees and Implementing Entity. Nesting sites must also be noted on plans that are submitted to a Local Land Use Permittee.*

IV-9(b). *SSHCP RAPTOR-2 (Raptor Pre-Construction Surveys): Pre-construction surveys shall be required to determine if active nests are present with a project footprint or within 0.25-mile of a project footprint if existing or potential nest sites are found during initial surveys and construction activities shall occur during the raptor breeding season. An approved biologist shall conduct pre-construction surveys within 30 days and three days of ground-disturbing activities within the proposed project footprint and within 0.25-mile of the proposed project footprint to determine presence of nesting covered raptor species. Preconstruction surveys will be conducted during the raptor breeding season. If a nest is present, then RAPTOR-3 and RAPTOR-4 [Mitigation Measures IV-8(d) and IV-8(e)] shall be implemented. The approved biologist shall inform the Land Use Authority Permittee and Implementing Entity of species locations, and they in turn will notify the Wildlife Agencies." (SSHCP 2018). If nesting raptors are not found during the preconstruction surveys, the remainder of the mitigation measures for raptors below are not necessary.*

IV-9(c). *SSHCP RAPTOR-3 (Raptor Nest/Roost Buffer): If active nests are found within the project footprint or within 0.25-mile of any project-related Covered Activity, the Third-Party Project Proponent shall establish a 0.25-mile temporary nest disturbance buffer around the active nest until the young have fledged.*

IV-9(d). *SSHCP RAPTOR-4 (Raptor Nest/Roost Buffer Monitoring): If project-related Covered Activities within the temporary nest disturbance buffer are determined to be necessary during the nesting season, then an approved biologist experienced with raptor behavior shall be retained by the Third-Party Project Proponent to monitor the nest throughout the nesting season and to determine when the young have fledged. The approved biologist shall be on site daily while construction-related activities are taking place within the disturbance buffer. Work within the temporary nest disturbance buffer can occur with the written permission of the Implementing Entity and Wildlife Agencies. If nesting raptors begin to exhibit agitated behavior, such as defensive flights at intruders, getting up from a brooding position, or flying off the nest, the approved biologist/monitor shall have the authority to shut down construction activities. If agitated behavior is exhibited, the biologist, Third-Party Project Proponent, Implementing Entity, and Wildlife Agencies shall meet to determine the best course of action to avoid nest abandonment or take of individuals. The approved biologist shall also train construction personnel on the required avoidance procedures, buffer zones, and protocols in the event that a covered raptor species flies into an active construction zone (i.e., outside the buffer zone).*

Greater Sandhill Crane

IV-10(a). *SSHCP GSC-1 (Greater Sandhill Crane Surveys): If modeled habitat for greater sandhill crane (Figure 3-22) is present within a Covered Activity's project footprint or within 0.5 mile of a project footprint, then an approved biologist will conduct a field investigation to determine if existing or potential roosting sites are present within the project footprint and adjacent areas within 0.5 mile of the project footprint. Adjacent parcels under different land ownership will be surveyed only if access is granted or if the parcels are visible from authorized areas. Roosting sites within the Plan Area are often associated with flooded fields, seasonal wetlands, and freshwater marsh. The Third-Party Project Proponent will map all existing or potential roosting sites and provide these maps to the Local Land Use Permittees and Implementing Entity. Roosting sites must also be noted on plans that are submitted to a Local Land Use Permittee. See Chapter 10 for the process to conduct and submit survey information.*

IV-10(b). *SSHCP GSC-2 (Greater Sandhill Crane Pre-Construction Surveys): Pre-construction surveys will be required to determine if active roosting sites are present within a project footprint or within 0.5 mile of a project footprint if existing or potential roosting sites were found during initial surveys and construction activities will occur when wintering flocks are present within the Plan Area (September 1 through March 15). An approved biologist will conduct pre-construction surveys within 15 days of ground-disturbing activities, and within 0.5 mile of a project footprint, to determine presence of roosting greater sandhill cranes. Pre-construction surveys will be conducted September 1 through March 15, when wintering flocks are present within the Plan Area. If birds are present, then GSC-3, GSC-4, and GSC-5 will be implemented. The approved biologist will inform the Land Use Authority Permittee and Implementing Entity of species locations, and they in turn will notify the Wildlife Agencies.*

IV-10(c). SSHCP GSC-3 (Greater Sandhill Crane Roosting Buffer): If active roosting sites are found within the project footprint or within 0.5 mile of any project-related Covered Activity, the Third-party Project Proponent will establish a 0.5-mile temporary roosting disturbance buffer around the roosting site until the cranes have left.

IV-10(d). SSHCP GSC-4 (Greater Sandhill Crane Visual Barrier): Greater sandhill cranes have low tolerance for human disturbance, and such disturbance has caused cranes to abandon foraging and roosting sites. Repeat disturbance affects their ability to feed and store energy needed for survival. If project-related activities occur within 0.5 mile of a known roosting site as identified by surveys conducted during implementation of GSC-1 or GSC-2, a visual barrier will be constructed.

IV-10(e). SSHCP GSC-5 (Greater Sandhill Crane Roosting Buffer Monitoring): If roosting sites are found within the project footprint or within 0.50 mile of any project-related Covered Activity, an approved biologist experienced with greater sandhill crane behavior will be retained by the Third-Party Project Proponent to monitor the roosting site throughout the roosting season and to determine when the birds have left. The approved biologist will be on site daily while construction-related activities are taking place within the disturbance buffer. Work within the temporary disturbance buffer can only occur with the written permission of the Implementing Entity and Wildlife Agencies. If greater sandhill cranes are abandoning their roosting and/or forage sites, the approved biologist will have the authority to shut down construction activities. If roost abandonment occurs, the approved biologist, Third-Party Project Proponent, Implementing Entity, and Wildlife Agencies will meet to determine the best course of action to avoid harm and harassment of individuals. The approved biologist will also train construction personnel on the avoidance procedures, buffer zones, and protocols in the event that greater sandhill cranes move into an active construction zone (i.e., outside the buffer zone).

Swainson's Hawk

IV-11(a). SSHCP SWHA-1 (Swainson's Hawk Surveys): If modeled habitat for Swainson's hawk (Figure 3-25 [of the SSCP]) is present within a Covered Activity's project footprint or within 0.25 mile of a project footprint as is the case for the proposed project, then an approved biologist shall conduct a survey to determine if existing or potential nesting sites are present within the project footprint and adjacent areas within 0.25 mile of the project footprint. Adjacent parcels under different land ownership shall be surveyed only if access is granted or if the parcels are visible from authorized areas. Nest sites are often associated with Riparian land cover, but also include lone trees in fields, trees along roadways, and trees around structures. Nest trees may include, but are not limited to, Fremont's cottonwood (Populus fremontii), oaks (Quercus spp.), willows (Salix spp.), walnuts (Juglans spp.), eucalyptus (Eucalyptus spp.), pines (Pinus spp.), and Deodar cedar (Cedrus deodara). The Third-Party Project Proponent shall map all existing and potential nesting sites and provide these maps to the Local Land Use Permittees and Implementing Entity. Nesting sites must also be noted on plans that are submitted to a Local Land Use

Permittee. See Chapter 10 [of the SSHCP] for the process to conduct and submit survey information.

IV-11(b). *SSHCP SWHA-2 (Swainson's Hawk Pre-Construction Surveys): Pre-construction surveys shall be required to determine if active nests are present within a project footprint or within 0.25-mile of a project footprint if existing or potential nest sites were found during initial surveys and construction activities shall occur during the breeding season (March 1 through September 15). An approved biologist shall conduct pre-construction surveys within 30 days and 3 days of ground-disturbing activities to determine presence of nesting Swainson's hawk. Pre-construction surveys will be conducted during the breeding season (March 1 through September 15). If a nest is present, then SWHA-3 and SWHA-4 [Mitigation Measures IV-3(c) and IV-3(d)] shall be implemented. The approved biologist shall inform the Land Use Authority Permittee and Implementing Entity of species locations, and they in turn will notify the Wildlife Agencies.*

IV-11(c). *SSHCP SWHA-3 (Swainson's Hawk Nest Buffer): If active nests are found within the project footprint or within 0.25 mile of any project-related Covered Activity, the Third-Party Project Proponent shall establish a 0.25-mile disturbance buffer around the active nest until the young have fledged, with concurrence from the Wildlife Agencies.*

IV-11(d). *SSHCP SWHA-4 (Swainson's Hawk Nest Buffer Monitoring): If nesting Swainson's hawks are present within the project footprint or within 0.25-mile of any project-related Covered Activity, then an approved biologist experienced with Swainson's hawk behavior shall be retained by the Third-Party Project Proponent to monitor the nest throughout the nesting season and to determine when the young have fledged. The approved biologist shall be on site daily while construction-related activities are taking place within the buffer. Work within the temporary nest disturbance buffer can occur with the written permission of the Implementing Entity and Wildlife Agencies. If nesting Swainson's hawks begin to exhibit agitated behavior, such as defensive flights at intruders, getting up from a brooding position, or flying off the nest, the approved biologist shall have the authority to shut down construction activities. If agitated behavior is exhibited, the biologist, Third-Party Project Proponent, Implementing Entity, and Wildlife Agencies shall meet to determine the best course of action to avoid nest abandonment or take of individuals. The approved biologist shall also train construction personnel on the required avoidance procedures, buffer zones, and protocols in the event that a Swainson's hawk flies into an active construction zone (i.e., outside the buffer zone).*

Tricolored Blackbird

IV-12(a). *SSHCP TCB-1 (Tricolored Blackbird Surveys): If modeled habitat for tricolored blackbird is present within a Covered Activity's project footprint or within 500 feet of a project footprint (as is the case for the proposed project), then an approved biologist shall conduct a field investigation to determine if existing or potential nesting or foraging sites are present within the project footprint and adjacent areas within 500 feet of the project footprint. Adjacent parcels under different land ownership shall be*

surveyed only if access is granted or if the parcels are visible from authorized areas. Within the Plan Area, potential tricolor blackbird nest sites are often associated with freshwater marsh and seasonal wetlands, or in thickets of willow, blackberry, wild rose, thistle, and other thorny vegetation. Tricolored blackbirds are also known to nest in crops associated with dairy farms. Foraging habitat is associated with annual grasslands, wet and dry vernal pools and other seasonal wetlands, agricultural fields (such as large tracts of alfalfa and pastures with continuous haying schedules and recently tilled fields), cattle feedlots, and dairies. The Third-Party Project Proponent shall map all existing or potential nesting or foraging sites and provide these maps to the Local Land Use Permittees and Implementing Entity. Nesting sites must also be noted on plans that are submitted to a Local Land Use Permittee.

IV-12(b). *SSHCP TCB-2 (Tricolored Blackbird Pre-Construction Surveys): Pre-construction surveys will be required to determine if active nests are present within a project footprint or within 500 feet of a project footprint if existing or potential nest sites were found during design surveys and construction activities shall occur during the breeding season (March 1 through September 15). An approved biologist shall conduct pre-construction surveys within 30 days and within 3 days of ground-disturbing activities, and within the proposed project footprint and 500 feet of the proposed project footprint to determine the presence of nesting tricolored blackbird. Pre-construction surveys shall be conducted during the breeding season (March 1 through August 31). Surveys conducted in February (to meet pre-construction survey requirements for work starting in March) must be conducted within 14 days and 3 days in advance of ground-disturbing activities. If a nest is present, then TCB-3 and TCB-4 [Mitigation Measures IV-6(c) and IV-6(d)] shall be implemented. The approved biologist shall inform the Land Use Authority Permittee and the Implementing Entity of species locations, and they in turn will notify the Wildlife Agencies (SSHCP 2018). If nesting tricolored blackbirds are not found during the preconstruction surveys, the remainder of the mitigation measures for tricolored blackbirds below are not necessary.*

IV-12(c). *SSHCP TCB-3 (Tricolored Blackbird Nest Buffer): If active nests are found within the project footprint or within 500 feet of any project-related Covered Activity, the Third-Party Project Proponent shall establish a 500-foot temporary buffer around the active nest until the young have fledged.*

IV-12(d). *SSHCP TCB-4 (Tricolored Blackbird Nest Buffer Monitoring): If nesting tricolored blackbirds are present within the project footprint or within 500 feet of any project-related Covered Activity, then an approved biologist experienced with tricolored blackbird behavior shall be retained by the Third-Party Project Proponent to monitor the nest throughout the nesting season and to determine when the young have fledged. The approved biologist shall be on site daily while construction-related activities are taking place near the disturbance buffer. Work within the nest disturbance buffer shall not be permitted. If the approved biologist determines that tricolored blackbirds are exhibiting agitated behavior, construction shall cease until the buffer size is increased to a distance necessary to result in no harm or*

harassment to the nesting tricolored blackbirds. If the biologist determines that the colonies are at risk, a meeting with the Third-Party Project Proponent, Implementing Entity, and Wildlife Agencies shall be held to determine the best course of action to avoid nest abandonment or take of individuals. The approved biologist shall also train construction personnel on the required avoidance procedures, buffer zones, and protocols in the event that a tricolored blackbird flies into an active construction zone (i.e., outside the buffer zone).

IV-12(e). *SSHCP TCB-5 (Timing of Pesticide Use and Harvest Timing on Agricultural Preserve): On SSHCP Agricultural Preserves, pesticides (including herbicides) shall not be applied from January 1 through July 15.*

Western Red Bat

IV-13(a). *SSHCP BAT-1 (Winter Hibernaculum Surveys): If modeled habitat for western red bat is present within 300 feet of a Covered Activity's project footprint (as is the case for the proposed project), then an approved biologist shall conduct a field investigation of the project footprint and adjacent areas within 300 feet of a project footprint to determine if a potential winter hibernaculum is present, and to identify and map potential hibernaculum sites. Adjacent parcels under different land ownership shall be surveyed only if access is granted or if the parcels are visible from authorized areas. If potential hibernaculum sites are found, the Third-Party Project Proponent shall note their locations on project designs and shall design the project to avoid all areas within a 300-foot buffer around the potential hibernaculum sites. Winter hibernaculum habitat is fully avoided if project-related activities do not impinge on a 300-foot buffer established by the approved biologist around an existing or potential winter hibernaculum site.*

IV-13(b). *SSHCP BAT-2 (Winter Hibernaculum Pre-Construction Surveys): If the Third-Party Project Proponent elects not to avoid potential winter hibernaculum sites within the project footprint plus a 300-foot buffer, additional surveys are required. Prior to any ground disturbance related to Covered Activities, an approved biologist shall conduct a pre-construction survey within 3 days of ground-disturbing activities within the project footprint and 300 feet of the project footprint to determine the presence of winter hibernaculum sites. Pre-construction surveys shall be conducted during the winter hibernaculum season (November 1 through March 31). If a winter hibernaculum is present, then BAT-3 and BAT-4 [Mitigation Measures IV-9(c) and IV-9(d)] shall be implemented. The approved biologist shall inform the Land Use Authority Permittee and Implementing Entity of species locations, and they in turn shall notify the Wildlife Agencies.*

IV-13(d). *SSHCP BAT-3 (Winter Hibernaculum Buffer): If active winter hibernaculum sites are found within the project footprint or within 300 feet of the project footprint, the Third-Party Project Proponent shall establish a 300-foot temporary disturbances buffer around the active winter hibernaculum site until bats have vacated the hibernaculum and the Implementing Entity and Wildlife Agencies concur.*

IV-13(e). SSHCP BAT-4 (Bat Eviction Methods): An approved biologist shall determine if non-maternity and non-hibernaculum day and night roosts are present on the project site. If necessary, an approved biologist shall use safe eviction methods to remove bats if direct impacts to non-maternity and non-hibernaculum day and night roosts cannot be avoided. If a winter hibernaculum site is present, Covered Activities shall not occur until the hibernaculum is vacated, or, if necessary, safely evicted using methods acceptable to the Wildlife Agencies.

Other Nesting Birds

IV-14. A qualified biologist shall conduct a preconstruction nesting bird survey of all areas associated with construction activities, and a 100-foot buffer around these areas, within 14 days prior to commencement of construction if construction occurs during the nesting season (February 1 through August 31). If active nests are found, a no-disturbance buffer around the nest shall be established. The buffer distance shall be established by a qualified biologist in consultation with the CDFW. The buffer shall be maintained until the fledglings are capable of flight and become independent of the nest, to be determined by a qualified biologist. Once the young are independent of the nest, no further measures are necessary.

b,c. A preliminary aquatic resources assessment was conducted as part of the Biological Resources Assessment to determine the approximate extent of potential waters of the U.S. as defined by the Clean Waters Act. The SSHCP Land Cover Types Stream/Creek and Mixed Riparian Woodland are considered Aquatic Land Cover Types. SSHCP Aquatic Land Cover Types or aquatic resources were not identified within the Island Annexation Area. The Stream/Creek land type occupies 2.22 acres of the Fairway Oaks VTM Site, and Mixed Riparian Woodland occupies 4.96 acres. However, the proposed Fairway Oaks VTM would maintain the area near Dry Creek as open space, and Dry Creek would not be impacted by the development. Nonetheless, the potential exists for the aquatic features listed above to be impacted during development of the Fairway Oaks VTM Site. Therefore, the proposed project could have a substantial adverse effect on riparian habitat, sensitive natural communities, or federally protected wetlands, and a ***potentially significant*** impact could occur.

Mitigation Measure(s)

Implementation of the following mitigation measures would reduce the above potential impact to a *less-than-significant* level.

Island Annexation Area

IV-15 If the reconnaissance-level site assessment and literature review described in Mitigation Measure IV-1 confirm the presence of potential Waters of the U.S., Mitigation Measures IV-16(a) through IV-16(d) shall be implemented for the Island Annexation Area. For proposed projects on developed lands in the Island Annexation Area, the City shall determine whether participation in the SSHCP would be required.

Fairway Oaks VTM Site

IV-16(a). Before applying for a SSHCP permit or authorization under the SSHCP ARP, the Project applicant shall secure verification of aquatic resources on

the Project Area by the United States Army Corps of Engineers (USACE). This process requires submittal of a wetland delineation map conducted in accordance with the Corps of Engineers Wetlands Delineation Manual (Environmental Laboratory 1987) and the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (USACE 2008). The wetland delineation shall follow the minimum standards set forth by the Sacramento District USACE and State Water Resources Control Board (SWRCB) at the time of the delineation. The results of the wetland delineation shall be documented in a letter or report that describes all aquatic resources, including wetlands, that may be regulated by USACE under Section 404 of the federal CWA or by the SWRCB. The wetland delineation and map shall describe and quantify all aquatic resources defined as Waters of the U.S./State as well as the SSHCP aquatic land cover type as defined in Appendix E of SSHCP.

IV-16(b). *Before the approval of grading and improvement plans and before any groundbreaking activity associated with the Project, the Project applicants shall ensure that authorization pursuant to CWA Section 404 from the USACE and CWA Section 401 from the Central Valley RWQCB is obtained (i.e., through permitting under the SSHCP ARP) for any potential impacts to Waters of the U.S./State/SSHCP aquatic land cover types. The construction contractor shall adhere to all conditions outlined in the SSHCP ARP and 401 Certification. The Project applicants shall ensure that the Project replaces, restores, or enhances on a "no net loss" basis (in accordance with the USACE and the Central Valley RWQCB) the acreage of all wetlands and other Waters of the U.S./State that would be removed, lost, and/or degraded due to project implementation, either through the SSHCP In-Lieu Fee Program or by other methods agreeable to the USACE, the Central Valley RWQCB, and the City, as appropriate, depending on agency jurisdiction, and as determined during the Section 401, and Section 404/SSHCP ARP permitting processes.*

IV-16(c). *Before the approval of grading and improvement plans and before any groundbreaking activity associated with the Project, the Project applicants shall ensure that authorization pursuant to Section 1600-1616 of the California Fish and Game Code (CDFW 1602 Streambed Alteration Agreement) has been obtained (i.e., through direct application to CDFW for a Section 1602 SAA). The Project applicants can fulfill compensatory mitigation requirements either through the SSHCP In-Lieu Fee Program or by other methods agreeable to CDFW. The construction contractor shall adhere to all conditions outlined in the Section 1602 SAA and SSHCP Permit.*

IV-16(d). *Before the approval of grading and improvement plans and before any groundbreaking activity associated with the Project, the Project applicants shall ensure that mitigation for impacts to aquatic features and other habitat for special-status species has been implemented through the SSHCP In-Lieu Fee Program or by other methods agreeable to the USACE, RWQCB, USFWS, CDFW, and the City, as appropriate, depending on agency jurisdiction.*

d. Wildlife corridors are linear and/or regional habitats that provide connectivity to other natural vegetation communities within a landscape fractured by urbanization and other development. Regional wildlife corridors provide foraging, breeding, and retreat areas for migrating, dispersing, immigrating, and emigrating wildlife populations. Local wildlife corridors also provide access routes to food, cover, and water resources within restricted habitats.

As noted in the Biological Resources Assessment, the Island Annexation Area is located within a residential region consisting of low-density, single-family homes and associated roadways. Riparian habitat corridors, emergent wetlands, and nursery sites do not exist within the Island Annexation Area, and the Island Annexation Area is not considered an Essential Connectivity Area by the CDFW. Therefore, the Island Annexation Area is unlikely to serve as a wildlife corridor.

The Fairway Oaks VTM Site is bounded by SR 99 to the northeast and development to the north and west. The Fairway Oaks VTM Site is not considered an Essential Connectivity Area by the CDFW, and nursery sites have not been documented on the site or observed during the site reconnaissance. The Dry Creek corridor, which runs through the Fairway Oaks VTM Site, likely serves as a movement corridor. Based on aerial imagery, an obvious barrier to wildlife movement along the Dry Creek corridor does not exist. While local animals may rely on the riparian corridor provided by Dry Creek, the proposed open space zone is anticipated to preserve the corridor for use by wildlife. Under General Plan Policy PFS-8.2, developers of land adjacent to Dry Creek are required to provide a continuous trail and designate land for dedicated wildlife habitat. As such, the site design would be required to allow wildlife movement along the Dry Creek corridor, and the project would not interfere substantially with the movement of any resident or migratory fish or wildlife species or with established resident or migratory wildlife corridors, or impede the use of wildlife nursery sites.

Based on the above, the project site is not likely to serve as a wildlife movement corridor, and a ***less-than-significant*** impact would occur.

e. **Island Annexation Area**

Several trees are present within the Island Annexation Area, including oak trees that may be considered heritage trees. If future development within the Island Annexation Area requires tree removal, the project would be required to comply with Section 18.52.060 of the City's Municipal Code.

Fairway Oaks VTM Site

Ornamental trees including blue-gum, cherry plum, apple, and common jujube, are present along the roads and around the residences within the Fairway Oaks VTM Site, and a stand of trees is present along the southeastern site boundary adjacent to Dry Creek. The trees along Dry Creek include interior live oak, valley oak, pecan, Oregon ash, black walnut, box-elder, and California buckeye. Should the proposed development within the Fairway Oaks VTM Site require tree removal, the project would be required to comply with Section 18.52.060 of the City's Municipal Code, which requires prior permission and written approval from the Community Development Director before removal of any tree, shrub, or plant within any street tree area or other public place.[9] In addition, the project would be required to comply with General Plan Policy COS-3.2, Mature Tree and

[9] City of Galt. *Galt Municipal Code* [Section 18.52.060]. April 16, 2019.

Woodland Preservation, which indicates that the City of Galt shall encourage retention of mature trees and woodlands to the maximum extent possible.[10]

According to the Biological Resources Assessment, the Fairway Oaks VTM Site contains at least one oak tree that would be considered a Heritage Tree under Section 18.52.060. Compliance with applicable Municipal Code regulations would be required to reduce any related potential impacts.

Conclusion

In the event that the future development within the Island Annexation Area or the proposed development on the Fairway Oaks VTM Site does not comply with Section 18.52.060 of the City's Municipal Code, significant adverse effects could occur. Therefore, the proposed project could conflict with the City of Galt Tree Ordinance, and a ***potentially significant*** impact would occur related to conflicting with local policies or ordinances protecting biological resources.

Mitigation Measure(s)

Implementation of the following mitigation measures would reduce the above potential impact to a *less-than-significant* level.

Island Annexation Area and Fairway Oaks VTM Site

IV-17. *Prior to the removal of any trees, a tree removal permit shall be obtained from the City of Galt, and the project applicant shall comply with all of the conditions of the permit. For trees to be retained, a tree preservation plan shall be prepared for the proposed project identifying all protection and mitigation measures to be taken. The measures shall remain in place for the duration of the construction activities at the project site. The tree preservation plan shall be submitted to and approved by the City of Galt Community Development Department.*

f. Both the Island Annexation Area and the Fairway Oaks VTM Site are located within the boundaries of the SSHCP, which establishes an effective framework to protect natural resources in south Sacramento County, while improving and streamlining the environmental permitting process for impacts on endangered species and provides guidance for the mitigation of impacts to covered species. The project site is located within the Preserve Planning Unit 8 (PPU 8) of the SSHCP. Applicable Avoidance and Minimization Measures for SSHCP covered species known to occur within the project region have been included as Mitigation Measures IV-1 through IV-14 of this IS/MND. Additionally, the proposed project would be subject to pay all applicable development fees according to the site's land cover types.[11] It should be noted that if a development application is submitted for the Island Annexation Area, implementation of the mitigation measures within this section of the IS/MND, or similar mitigation, would be required to ensure consistency with the SSHCP.

[10] City of Galt. *Galt 2030 General Plan Policy Document* [pg. COS-5]. April 2009.

[11] County of Sacramento. *2019 SSHCP Mitigation Fees Per Acre*. Available at: https://planning.saccounty.net/PlansandProjectsIn-Progress/Pages/SSHCPPlan.aspx. Accessed December 2019.

Therefore, the proposed project would not conflict with the applicable provisions of the SSHCP and a ***less-than-significant*** impact would occur related to conflicts with an adopted HCP, NCCP, or other approved local, regional, or State HCP.

V. CULTURAL RESOURCES. *Would the project:*	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☐	✖	☐	☐
b. Cause a substantial adverse change in the significance of a unique archaeological resource pursuant to Section 15064.5?	☐	✖	☐	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries.	☐	✖	☐	☐

Discussion

a-c. Historical resources are features that are associated with the lives of historically important persons and/or historically significant events, that embody the distinctive characteristics of a type, period, region or method of construction, or that have yielded, or may be likely to yield, information important to the pre-history or history of the local area, California, or the nation. Examples of typical historical resources include, but are not limited to, buildings, farmsteads, rail lines, bridges, and trash scatters containing objects such as colored glass and ceramics. According the City of Galt General Plan, the City is a culturally rich area with multiple historical and archaeological resources, including the Liberty Cemetery and Rae House Museum.[12]

The Galt 2030 General Plan EIR determined that prehistoric sites would likely be located along waterways such as the Cosumnes River and Dry Creek. Consistent with Mitigation Measure HRE-4.1 of the General Plan EIR, a records search was conducted by the North Central Information Center (NCIC) for the previously approved Fairway Oaks VTM Project. While the search area did not specifically encompass the Island Annexation Area or the two additional parcels that were added to the Fairway Oaks VTM Site, the NCIC search did not identify any records of prehistoric archaeological sites, historic-period resources, archaeological studies, or historic properties within or adjacent to the project site. The NCIC determined a low to moderate sensitivity for identifying prehistoric archaeological sites, and moderate sensitivity for finding historic-period cultural resources.

Accordingly, the potential exists for previously unidentified cultural resources to be encountered on or below the surface that could be inadvertently damaged or lost during grading and construction of the Fairway Oaks VTM Site or during future development within the Island Annexation Area. Therefore, a potentially significant impact could occur to unknown archaeological and paleontological resources, as well as the disruption of human remains, during grading and excavation activities.

Based on the analysis above, the proposed project could cause a substantial adverse change in the significance of a historic or archaeological resource pursuant to CEQA Guidelines Section 15064.5 and/or disturb human remains, including those interred outside of formal cemeteries during construction. Therefore, impacts related to implementation of the proposed project could be considered ***potentially significant***.

Mitigation Measure(s)

Implementation of the following mitigation measures would reduce the above potential impact to a *less-than-significant* level.

[12] City of Galt. *Galt 2030 General Plan, Existing Conditions Report* [Table 9.1]. November 2005.

Island Annexation Area and Fairway Oaks VTM Site

V-1. *Prior to grading permit issuance, the developer shall submit plans to the Community Development Department for review and approval which indicate (via notation on the improvement plans) that if historic and/or cultural resources are encountered during site grading or other site work, all such work shall be halted immediately within 100 feet and the developer shall immediately notify the Community Development Department of the discovery. In such case, the developer shall be required, at their own expense, to retain the services of a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeologist for the purpose of recording, protecting, or curating the discovery as appropriate. The archaeologist shall be required to submit to the Community Development Department for review and approval a report of the findings and method of curation or protection of the resources. Further grading or site work within the area of discovery shall not be allowed until the preceding work has occurred.*

V-2. *If human remains, or remains that are potentially human, are found during construction, a professional archeologist shall ensure reasonable protection measures are taken to protect the discovery from disturbance. The archaeologist shall notify the Sacramento County Coroner (per §7050.5 of the State Health and Safety Code). The provisions of §7050.5 of the California Health and Safety Code, §5097.98 of the California Public Resources Code, and Assembly Bill 2641 will be implemented. If the Coroner determines the remains are Native American and not the result of a crime scene, then the Coroner will notify the Native American Heritage Commission (NAHC), which then will designate a Native American Most Likely Descendant (MLD) for the project (§5097.98 of the Public Resources Code). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the applicant does not agree with the recommendations of the MLD, the NAHC can mediate (§5097.94 of the Public Resources Code). If an agreement is not reached, the qualified archaeologist or most likely descendent must rebury the remains where they will not be further disturbed (§5097.98 of the Public Resources Code). This will also include either recording the site with the NAHC or the appropriate Information Center, using an open space or conservation zoning designation or easement, or recording a reinternment document with the county in which the property is located (AB 2641). Work cannot resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.*

VI. ENERGY. *Would the project:*	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	✖	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	✖	☐

Discussion

a,b. The proposed project does not involve any development on the Island Annexation Area and, thus, would not directly result in any associated increase in energy use. However, future development of the Island Annexation Area would involve approximately 158 residential units on the site, which would involve an increase in energy use from existing conditions. Development of the Fairway Oaks VTM would also result in an increase in energy use from existing conditions. The main forms of available energy supply are electricity, natural gas, and oil. A description of the 2019 California Green Building Standards Code and the Building Energy Efficiency Standards, with which the proposed project would be required to comply, as well as discussions regarding the proposed project's potential effects related to energy demand during construction and operations, are provided below.

California Green Building Standards Code

The 2019 California Green Building Standards Code, otherwise known as the CALGreen Code (CCR Title 24, Part 11), is a portion of the CBSC, which became effective with the rest of the CBSC on January 1, 2020. The purpose of the CALGreen Code is to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practices. The CALGreen standards regulate the method of use, properties, performance, types of materials used in construction, alteration repair, improvement and rehabilitation of a structure or improvement to property. The provisions of the code apply to the planning, design, operation, construction, use, and occupancy of every newly constructed building or structure throughout California. Requirements of the CALGreen Code include, but are not limited to, the following measures:

- Compliance with relevant regulations related to future installation of Electric Vehicle charging infrastructure in residential and non-residential structures;
- Indoor water use consumption is reduced through the establishment of maximum fixture water use rates;
- Outdoor landscaping must comply with the California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWELO), or a local ordinance, whichever is more stringent, to reduce outdoor water use;
- Diversion of 65 percent of construction and demolition waste from landfills; and
- Mandatory use of low-pollutant emitting interior finish materials such as paints, carpet, vinyl flooring, and particle board.

Building Energy Efficiency Standards

The 2019 Building Energy Efficiency Standards is a portion of the CBSC, which expands upon energy efficiency measures from the 2016 Building Energy Efficiency Standards, resulting in a seven percent reduction in energy consumption from the 2016 standards for residential structures. Energy reductions relative to the 2016 Building Energy Efficiency Standards would be achieved through various regulations including requirements for the use of high efficacy lighting, improved water heating system efficiency, and high-performance attics and walls.

One of the improvements included within the 2019 Building Energy Efficiency Standards is the requirement that certain residential developments, including some single-family and low-rise residential developments, include on-site solar energy systems capable of producing 100 percent of the electricity demanded by the residences. Certain residential developments, including developments that are subject to substantial shading, rendering the use of on-site solar photovoltaic systems infeasible, are exempted from the foregoing requirement; however, such developments are subject to all other applicable portions of the 2019 Building Energy Efficiency Standards. Once rooftop solar electricity generation is factored in, homes built under the 2019 standards will use approximately 53 percent less energy than those under the 2016 standards.

Island Annexation Area

Any future development within the Island Annexation Area would be subject to compliance with the previously mentioned CBSC requirements. Furthermore, development of the Island Annexation Area under the existing General Plan land use designations was previously analyzed within the City of Galt's General Plan EIR. Because the proposed project would not include development within the Island Annexation Area and the existing land use designations would remain the same, any potential impacts related to energy resources from potential future development of the Island Annexation Area have already been anticipated and analyzed by the City.

Fairway Oaks VTM Site

The following sections describe energy use associated with construction and operation of the Fairway Oaks VTM Site.

Construction Energy Use

Construction activities associated with development of the Fairway Oaks VTM Site would involve on-site energy demand and consumption related to use of oil in the form of gasoline and diesel fuel for construction worker vehicle trips, hauling and materials delivery truck trips, and operation of off-road construction equipment. In addition, diesel-fueled portable generators may be necessary to provide additional electricity demands for temporary on-site lighting, welding, and for supplying energy to areas of the sites where energy supply cannot be met via a hookup to the existing electricity grid.

Even during the most intense period of construction, due to the different types of construction activities (e.g., site preparation, grading, building construction), only portions of the project site would be disturbed at a time, with operation of construction equipment occurring at different locations on the project site. In addition, all construction equipment and operation thereof would be regulated per the CARB In-Use Off-Road Diesel Vehicle Regulation. The In-Use Off-Road Diesel Vehicle Regulation is intended to reduce emissions from in-use, off-road, heavy-duty diesel vehicles in California by imposing limits

on idling, requiring all vehicles to be reported to CARB, restricting the addition of older vehicles into fleets, and requiring fleets to reduce emissions by retiring, replacing, or repowering older engines, or installing exhaust retrofits. The In-Use Off-Road Diesel Vehicle Regulation would subsequently help to improve fuel efficiency and reduce GHG emissions. Technological innovations and more stringent standards are being researched, such as multi-function equipment, hybrid equipment, or other design changes, which could help to reduce demand on oil and emissions associated with construction.

The CARB has recently prepared the *2017 Climate Change Scoping Plan Update* (2017 Scoping Plan),[13] which builds upon previous efforts to reduce GHG emissions and is designed to continue to shift the California economy away from dependence on fossil fuels. Appendix B of the 2017 Scoping Plan includes examples of local actions (municipal code changes, zoning changes, policy directions, and mitigation measures) that would support the State's climate goals. The examples provided include, but are not limited to, enforcing idling time restrictions for construction vehicles, utilizing existing grid power for electric energy rather than operating temporary gasoline/diesel-powered generators, and increasing use of electric and renewable fuel-powered construction equipment. The CARB Diesel Vehicle Regulation described above, with which the proposed project must comply, would be consistent with the intention of the 2017 Scoping Plan and the recommended actions included in Appendix B of the 2017 Scoping Plan.

Based on the above, the temporary increase in energy use occurring during construction of the Fairway Oaks VTM Site would not result in a significant increase in peak or base demands or require additional capacity from local or regional energy supplies. Construction activities would be required to comply with all applicable regulations related to energy conservation and fuel efficiency, which would help to reduce the temporary increase in demand. Furthermore, development of the project site with residential uses would be consistent with the site's existing General Plan land use designation; thus, development of the site and associated energy demands have been previously anticipated by the City and evaluated in the General Plan EIR.

Operational Energy Use

Following implementation of the development on the Fairway Oaks VTM Site, SMUD and PG&E would provide electricity and natural gas services, respectively, to the site. Energy use associated with operation of residential uses involves electricity and natural gas for interior and exterior building lighting, heating, ventilation, and air conditioning (HVAC), electronic equipment, refrigeration, appliances, and more. Maintenance activities during operations, such as landscape maintenance, would involve the use of electric or gas-powered equipment. In addition to on-site energy use, buildout of the Fairway Oaks VTM would result in transportation energy use associated with vehicle trips generated by the proposed single-family homes.

In addition, the proposed residential project would be subject to all relevant provisions of the most recent update of the CBSC, including the Building Energy Efficiency Standards. Adherence to the most recent CALGreen Code and the Building Energy Efficiency Standards would ensure that the proposed structures would consume energy efficiently through the incorporation of such features as efficient water heating systems, high performance attics and walls, and high efficacy lighting. Required compliance with the CBSC would ensure that the building energy use associated with the proposed project

[13] California Air Resources Board. *The 2017 Climate Change Scoping Plan Update.* January 20, 2017.

would not be wasteful, inefficient, or unnecessary. In addition, electricity supplied to the project site by SMUD would comply with the State's Renewable Portfolio Standard (RPS), which requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total procurement by 2020 and to 60 percent by 2030. Thus, a portion of the energy consumed during operation of the Fairway Oaks VTM Site would originate from renewable sources.

Furthermore, development of the Fairway Oaks VTM Site with residential uses would be consistent with the site's existing General Plan land use designation; thus, development of the site and associated energy demands have been previously anticipated by the City and evaluated in the General Plan EIR.

Conclusion

As discussed above, neither the potential future development of the Island Annexation Area nor the proposed development of the Fairway Oaks VTM Site would result in wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Thus, a ***less-than-significant*** impact would occur.

VII. GEOLOGY AND SOILS. *Would the project:*	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	✖	☐
ii. Strong seismic ground shaking?	☐	☐	✖	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	✖	☐
iv. Landslides?	☐	☐	✖	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	✖	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	✖	☐
d. Be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	✖	☐
e. 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?	☐	☐	✖	☐
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	✖	☐	☐

Discussion

ai-aii. The City of Galt's topography is relatively flat and the City is not located within an Alquist-Priolo Earthquake Fault Zone, nor is the City located in the immediate vicinity of an active fault.[14] The nearest active fault is the Clayton-Marsh Creek-Greenville Fault, which is located approximately 60 miles southwest of the project site. According to the Galt 2030 General Plan EIR, ground shaking hazards within the planning area are considered to be low.[15] The City of Galt is located in Seismic Risk Zone 3, and, although the potential for earthquakes is low within Zone 3, the possibility for damage could still occur.

Damage on the project site could occur in the event of a major seismic event earthquake from ground shaking and seismically-related ground failure. However, Policy SS-1.7 requires all new buildings to be built in accordance with the seismic requirements of the CBSC. The CBSC provides minimum standards to ensure that the proposed structures would be designed using sound engineering practices and appropriate engineering standards for the seismic area in which the project site is located. Projects designed in accordance with the CBSC should be able to: 1) resist minor earthquakes without damage; 2) resist moderate earthquakes without structural damage, but with some non-structural damage; and 3) resist major earthquakes without collapse, but with some structural, as well as non-structural, damage. Although conformance with the CBSC does not guarantee

[14] California Department of Conservation. *Fault Activity Map of California*. Available at: http://maps.conservation.ca.gov/cgs/fam/. Accessed January 2020.
[15] City of Galt. *City of Galt 2030 General Plan EIR*. [pg. 8-24]. April 2009.

that substantial structural damage would not occur in the event of a maximum magnitude earthquake, conformance with the CBSC can reasonably be assumed to ensure structures would be survivable, allowing occupants to safely evacuate in the event of a major earthquake.

Given that development is not currently proposed within the Island Annexation Area as part of the project, all existing uses outside of the Fairway Oaks VTM Site would be retained. Any future development within the Island Annexation Area would be designed according to the CBSC. In addition, development of the project site under the existing General Plan land use designation was previously analyzed within the City of Galt's General Plan EIR. Consequently, the proposed project and future development of the Island Annexation Area would not result in increased risk related to seismic hazards beyond the level that has been previously analyzed in the City of Galt's General Plan EIR. Therefore, people and structures would not be exposed to potential substantial adverse effects involving rupture of a known earthquake fault or strong seismic ground-shaking and a ***less-than-significant*** impact would occur.

aiii,aiv,
c. The potential effects related to liquefaction, landslides, lateral spreading, and subsidence/settlement associated with the Fairway Oaks VTM and future development of the Island Annexation Area are discussed in detail below.

Liquefaction

Liquefaction is a phenomenon in which granular material is transformed from a solid state to a liquefied state as a consequence of increased pore-water pressure and reduced effective stress. Increased pore-water pressure is induced by the tendency of granular materials to densify when subjected to cyclic shear stresses associated with earthquakes. Per the California Geologic Survey, the project site is not located within a designated seismic hazard zone for liquefaction.[16] In addition, Policy SS-2.1 of the City of Galt's General Plan, development within the Island Annexation Area and Fairway Oaks VTM Site may be required to prepare a soils report to determine whether permitting requirements should be placed on the project to avoid impacts related to liquefaction. Furthermore, the General Plan EIR analyzed soil conditions throughout the City and determined that the overall risk of liquefaction in the planning area is low to moderate. Given that the proposed project is consistent with the City's General Plan land use designations, the potential for buildout of the Fairway Oaks VTM and future buildout of the Island Annexation Area to result in liquefaction hazards has been analyzed in the General Plan EIR. Thus, impacts related to liquefaction would be less-than-significant.

Landslides

Seismically-induced landslides are triggered by earthquake ground shaking. The risk of landslide hazard is greatest in areas with steep, unstable slopes. The topography of the project site is flat, and the site is not located on or near any slopes. Furthermore, per the California Geologic Survey, the site is not located within a designated seismic hazard zone for landslides.[17] Additionally, the General Plan EIR analyzed risk of landslides within the project area and determined that compliance with Policies SS-1.3, SS-1.4, SS-2.1, SS-2.2, and SS-2.3 would reduce any potential hazards associated with landslides. Such

[16] California Geologic Survey. *Earthquake Zones of Required Investigation.* Available at: https://maps.conservation.ca.gov/cgs/EQZApp/app/. Accessed January 2020.
[17] *Ibid.*

policies include requirements related to preparation of grading and erosion control plans for new development projects. Furthermore, given that the proposed project is consistent with the City's General Plan land use designations, the potential for buildout of the Fairway Oaks VTM and future buildout of the Island Annexation Area to result in landslide hazards has been analyzed in the General Plan EIR. Thus, impacts related to landslides would be less-than-significant.

Lateral Spreading

Lateral spreading is horizontal or lateral ground movement of relatively flat-lying soil deposits towards a free face such as an excavation, channel, or open body of water. Typically, lateral spreading is associated with liquefaction of one or more subsurface layers near the bottom of the exposed slope. As discussed above, the project site does not contain any slopes, nor is the site located near any open faces that would be considered susceptible to lateral spreading. In addition, as noted above, the project site is not anticipated to be subject to substantial liquefaction hazards. Therefore, the potential for lateral spreading to pose a risk to the proposed development and any future development associated with the Island Annexation Area is low.

Subsidence / Settlement

Subsidence is the settlement of soils of very low density generally from either oxidation of organic material, or desiccation and shrinkage, or both, following drainage. Subsidence takes place gradually, usually over a period of several years. The General Plan EIR determined that the City is considered a potential subsidence area due to the underlying groundwater basin and the rates of groundwater withdrawal that have occurred in the area over the past few years. However, the EIR concluded that with implementation of General Plan Policies SS-2.1, SS-2.2, SS-2.3, and LU-1.9, impacts related to subsidence and settlement would be reduced to a less-than-significant level. Such policies include limits on development within unstable areas and requirements related to preparation of grading and erosion control plans for new development projects. Given that the proposed project would comply with the aforementioned policies, as well as General Plan Policy SS-1.7, requiring new buildings be built in accordance with the CBSC, the potential for subsidence to pose a risk to the proposed Fairway Oaks VTM Site development and future development of the Island Annexation Area would be relatively low. In addition, because the proposed project is consistent with the current General Plan land use designations, the potential for buildout of the Fairway Oaks VTM and future buildout of the Island Annexation Area to result in subsidence or settlement hazards has been analyzed in the General Plan EIR. Thus, impacts would be less-than-significant.

Conclusion

Based on the above, the proposed project would not be subject to substantial risks related to liquefaction, landslides, lateral spreading, and subsidence/settlement. Compliance with standard construction regulations included in the CBSC would ensure that the proposed development on the Fairway Oaks VTM Site and any future development within the Island Annexation Area would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving liquefaction, subsidence, or settlement, and would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site subsidence, liquefaction, or collapse. Thus, a ***less-than-significant*** impact would occur.

b. The project site is relatively flat with soil conditions that exhibit minimal potential for soil erosion. However, development of the site would increase the amount of impervious surfaces and potentially the erosion rate. Policy PFS-4.6 of the General Plan requires new development projects to prepare an erosion control plan, and Policy COS-1.12 requires development projects to implement Best Management Practices (BMPs) that would help minimize soil erosion during construction and grading activities. Additionally, Policy COS-1.12 requires, as part of Storm Water NPDES standards, implementation of a grading plan and Stormwater Pollution Prevention Plan (SWPPP) during construction activities associated with new development. The General Plan EIR determined that with implementation of the above policies, including requiring all new developments to submit a Grading Plan, Erosion Control Plan, and SWPPP, the impact would be less-than-significant. The proposed Fairway Oaks VTM is subject to the issuance of a Grading Permit and approval of the ancillary erosion and sediment control plan and SWPPP, in accordance with Chapter 16.30 of the Galt Municipal Code. In addition, given that the proposed project is consistent with the General Plan land use designations, the potential for buildout of the Fairway Oaks VTM and future buildout of the Island Annexation Area to result in soil erosion has been analyzed in the General Plan EIR. Issues related to erosion and degradation of water quality during construction are discussed in further detail in Section X, Hydrology and Water Quality, of this IS/MND. As noted therein, the proposed project would not result in substantial soil erosion or the loss of topsoil. Thus, a ***less-than-significant*** impact would occur.

d. Expansive soils are those possessing clay particles that react to moisture changes by shrinking or swelling. Expansive soils can also consist of silty to sandy clay. If structures are underlain by expansive soils, foundation systems must be capable of tolerating or resisting any potentially damaging soil movements, and building foundation areas must be properly drained. Overall, the General Plan concluded that with implementation of Policy SS-1.7, SS-2.1, SS-2.3, and LU-1.9, as well as compliance with CBSC requirements, impacts related to expansive soils would be less than significant.

According to the United States Department of Agriculture Natural Resources Conservation Service Web Soil Survey, two soil types have been identified within the Island Annexation Area: Kimball silt loam and San Joaquin silt loam. The Fairway Oaks VTM Site was determined to consist of a majority San Joaquin silt loam, and some Kimball soils and Sailboat loam.[18] The aforementioned soils do not have high shrink-swell potential. Sailboat silt loam does have high flood potential. However, the portion of the Fairway Oaks VTM Site designated as Sailboat silt loam is adjacent to Dry Creek and would be maintained as open space with development of the site. As such, development would not occur on Sailboat silt loam.

Therefore, development would not occur on expansive soil as defined in Table 18-1-B of the Uniform Building Code (1994) and would not create substantial risks to life or property, and impacts would be considered ***less-than-significant***.

e. The 173 single-family homes proposed as part of the project, as well as any future development within the Island Annexation Area, would connect to the City's sewer system. Although City water and sewer services would be made available to the properties within the Island Annexation Area, existing on-site wastewater systems could be maintained at the discretion of the land owner. However, should property owners within the Island

[18] United States Department of Agriculture Natural Resources Conservation Service. *Web Soil Survey*. Available at: websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx. Accessed February 2020.

Annexation Area wish to further develop their properties in excess of what is currently allowed under the County of Sacramento land use regulations, such development would be required to meet the City of Galt's development standards. Such standards include the requirement that new development be connected to City sewer services. Therefore, a ***less-than-significant*** impact regarding the capability of soil to adequately support the use of septic tanks or alternative wastewater disposal systems would occur.

f. The General Plan does not note the existence of any unique geologic features within the City and, consequently, implementation of the proposed project is not anticipated to result in direct or indirect destruction of unique geologic features. However, development allowed under the General Plan within the City could result in the discovery and disturbance of previously unknown or undiscovered paleontological resources. The General Plan EIR concluded that with implementation of Policy HRE-4.1 through HRE-4.4, which require all new development projects to comply with procedures upon discovery of unique paleontological resources, impacts related to disturbance of paleontological resources would be less than significant. Given that the proposed project is consistent with the General Plan land use designations, potential impacts to paleontological resources associated with buildout of the Fairway Oaks VTM and future buildout of the Island Annexation Area have been anticipated by the City and analyzed in the General Plan EIR. In addition, the project would be required to comply with Policy HRE-4.1 through HRE-4.4, as applicable.

While ground-disturbing activity, such as grading, trenching, or excavating associated with implementation of the proposed project and future development of the Island Annexation Area could have the potential to disturb or destroy such resources, compliance with the applicable General Plan policies would ensure that impacts related to paleontological resources would not be more severe than what has been previously anticipated. Without compliance with such policies, the proposed project could result in the direct or indirect destruction of a unique paleontological resource, and a ***potentially significant*** impact could occur.

Mitigation Measure(s)

Implementation of the following mitigation measures would reduce the above potential impact to a *less-than-significant* level.

Island Annexation Area and Fairway Oaks VTM Site

VII-1. *Should construction or grading activities result in the discovery of unique paleontological resources, all work within 100 feet of the discovery shall cease. The Community Development Director shall be notified, and the resources shall be examined by a qualified archaeologist or paleontologist, at the developer's expense, for the purpose of recording, protecting, or curating the discovery as appropriate. The archaeologist, paleontologist, or historian shall submit to the Community Development Department for review and approval a report of the findings and method of curation or protection of the resources. Work may only resume in the area of discovery when the preceding work has occurred.*

VIII. GREENHOUSE GAS EMISSIONS. *Would the project:*	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	✖	☐	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?	☐	✖	☐	☐

Discussion

a,b. Emissions of GHGs contributing to global climate change are attributable in large part to human activities associated with the industrial/manufacturing, utility, transportation, residential, and agricultural sectors. Therefore, the cumulative global emissions of GHGs contributing to global climate change can be attributed to every nation, region, and city, and virtually every individual on Earth. An individual project's GHG emissions are at a micro-scale level relative to global emissions and effects to global climate change; however, an individual project could result in a cumulatively considerable incremental contribution to a significant cumulative macro-scale impact. As such, impacts related to emissions of GHG are inherently considered cumulative impacts.

The proposed project does not involve any development on the Island Annexation Area and the existing General Plan land use designations would be retained. Buildout of the Island Annexation Area would be consistent with the General Plan land use designation for the site. As such, associated impacts have been anticipated by the City and analyzed in the General Plan EIR. Existing development within the Island Annexation Area currently results in GHG emissions. As discussed in further depth below, the City's recently adopted Climate Action Plan (CAP) included an inventory of existing Citywide emissions, as well as an estimation of future emissions based on buildout of the City's General Plan. The City's CAP includes Citywide measures intended to reduce emissions from existing sources, such as those sources that currently exist within the Island Annexation Area, as well as measures aimed at reducing emissions from future sources related to development within the City. Should any properties within the Island Annexation Area be developed in the future, such development would be required to comply with the City's CAP. Consequently, implementation of the proposed project would not result in impacts related to GHG emissions from the Island Annexation Area.

Implementation of the Fairway Oaks VTM would cumulatively contribute to increases of GHG emissions. Estimated GHG emissions attributable to future development would be primarily associated with increases of carbon dioxide (CO_2) and, to a lesser extent, other GHG pollutants, such as methane (CH_4) and nitrous oxide (N_2O) associated with area sources, mobile sources or vehicles, and utilities (electricity and natural gas). The primary source of GHG emissions for the Fairway Oaks VTM Site would be mobile source emissions. The common unit of measurement for GHG is expressed in terms of annual metric tons of CO_2 equivalents ($MTCO_2e$/yr).

For disclosure purposes, the GHG emissions associated with the Fairway Oaks VTM have been estimated using CalEEMod, based on the modeling assumptions presented in Section III, Air Quality, of this IS/MND. According to the CalEEMod results, the Fairway Oaks VTM would result in maximum unmitigated annual construction GHG emissions of 448.34 $MTCO_2e$/yr and annual operational GHG emissions of 1,310.36 $MTCO_2e$/yr.

Multiple agencies maintain guidance for the analysis of GHG emissions in the project area. SMAQMD has adopted thresholds of significance for GHG emissions during construction and operations of projects. Although SMAQMD maintains GHG emissions thresholds, SMAQMD's CEQA Guidelines note that where local jurisdictions have adopted thresholds or guidance for analyzing GHG emissions, the local thresholds should be used in project analysis. The City of Galt has recently adopted a CAP which provides a jurisdiction-wide approach to the analysis of GHG emissions. The Galt CAP includes a sustainability checklist to be used in analyzing the consistency of new development projects within the City of Galt with the City's CAP. Accordingly, the sustainability checklist has been completed for the Fairway Oaks VTM, and is included as Appendix C of this IS/MND. The analysis presented within the sustainability checklist is summarized below.

The sustainability checklist includes certain requirements for new developments within the City to ensure compliance with the City's CAP. For instance, the sustainability checklist requires that the project include bicycle, pedestrian, and transit infrastructure, pursuant to CAP Transportation Measures 1 and 2. Additionally, the project construction fleet may be required to include a percentage of construction equipment meeting the U.S. EPA's Tier 4 standards. Furthermore, the Galt CAP sustainability checklist requires outdoor electrical outlets or infrastructure to support the use of all electric landscaping equipment. Because the aforementioned features are not known to be included as part of the Fairway Oaks VTM at this time, without the implementation of mitigation, a significant impact could occur related to conflict with the Galt CAP sustainability checklist.

Per Section 2, Sustainable Design Options, of the sustainability checklist, the proposed project is required to meet at least two of the provided sustainable design options. The Fairway Oaks VTM project complies with the aforementioned requirement by constituting an infill project, and including sustainable design practices. As noted in the project description, the project site is surrounded by residential and commercial uses to the north, residential uses to the south, and SR 99 along the eastern border. In addition, some rural residential uses exist to the west. As such, the Fairway Oaks VTM project would qualify as an infill project as the project site adjoins existing development on at least 75 percent of the site's perimeter. Pursuant to the CBSC and City's Municipal Code, the Fairway Oaks VTM would include several sustainable design features, including the following:

- Outdoor landscaping must reduce outdoor water use through compliance with the California Department of Water Resources Model Water Efficient Landscape Ordinance (MWELO) and landscape water efficiency standards set forth in Chapter 18.52 of the Municipal Code;
- 65 percent of construction and demolition waste must be diverted from landfills;
- Installation of high efficacy lighting and water heating systems;
- Installation of electric vehicle charging infrastructure;
- Inclusion of high-performance attics and walls; and
- Implementation of on-site solar energy systems capable of producing 100 percent of the on-site electricity demand.

With the inclusion of the above sustainable design practices and the project's status as an infill project, the Fairway Oaks VTM project would comply with the requirements in Section 2 of the Galt CAP sustainability checklist.

Based on the above, the proposed project could generate GHG emissions that would have a significant impact on the environment or conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG. Therefore, impacts would be considered ***potentially significant***.

Mitigation Measure(s)

Implementation of the following mitigation measures would reduce the above potential impact to a *less-than-significant* level.

Island Annexation Area and Fairway Oaks VTM Site

VIII-1. *Prior to the start of construction activities, the project applicant shall submit a construction equipment inventory list to the City Engineer demonstrating compliance with U.S. EPA Tier 4 engine requirements as outlined in the City's Sustainability Checklist and CAP. The use of alternatively fueled construction equipment, such as hybrid electric or natural gas-powered equipment, would be acceptable, given that such technologies are implemented to a level sufficient to achieve similar emission reductions as would occur with the use of Tier 4 engines.*

VIII-2. *Prior to the issuance of building permits, the project applicant/developer shall submit a Landscaping Plan for review and approval by the Community Development Department. The Landscaping Plan shall be prepared in accordance with Chapter 18.52.040 of the Municipal Code.*

VIII-3. *Prior to the issuance of building permits, the project applicant/developer shall demonstrate, to the satisfaction of the City, the incorporation of outdoor electrical outlets or other infrastructure into project Improvement Plans for review and approval by the City Engineer.*

IX. HAZARDS AND HAZARDOUS MATERIALS. *Would the project:*	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	✖	☐
b. 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?	☐	✖	☐	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	✖	☐
d. 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?	☐	☐	☐	✖
e. 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?	☐	☐	☐	✖
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	✖	☐
g. Expose people or structures, either directly or indirectly, to the risk of loss, injury or death involving wildland fires?	☐	☐	✖	☐

Discussion

a.

Island Annexation Area

The Island Annexation Area would retain the current General Plan land use designation and further development of the area is not proposed at this time. Accordingly, construction activities would not occur within the Island Annexation Area with implementation of the proposed project. However, should development occur within the area in the future, the proponent for such developments would be required to comply with the regulations of governing the use of potentially hazardous products during both construction and operations of any future development. Considering that the proposed project would not alter the existing land use within the Island Annexation Area, the potential impacts related to creating a significant hazard to the public through the routine transport, use, or disposal of hazardous materials would be consistent with the analysis in the General Plan EIR.

Fairway Oaks VTM Site

Residential land uses are not typically associated with the routine transport, use, disposal, or generation of substantial amounts of hazardous materials. Future residents may use common household cleaning products, fertilizers, and herbicides on-site, any of which could contain potentially hazardous chemicals; however, such products would be expected to be used in accordance with label instructions. Due to the regulations governing use of such products and the amount anticipated to be used on the site, routine use of such products would not represent a substantial risk to public health or the environment.

Conclusion

Based on the above, development of the Island Annexation Area would not occur as part of the proposed project. Should future development of the Island Annexation Area occur, any future use of hazardous materials would be limited, and would occur in compliance with the levels anticipated for the project site in the City's General Plan EIR. Similarly, the residential uses proposed as part of the Fairway Oaks VTM are not anticipated to involve the routine transport, use, or disposal of substantial quantities of hazardous materials relative to what has been anticipated for the site per the City and analyzed in the General Plan EIR. Therefore, the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and a ***less-than-significant*** impact would occur.

b. **Island Annexation Area**

Ground-disturbing activities would not occur within the Island Annexation Area as part of the proposed project. However, because a Phase I Environmental Site Assessment (ESA) has not been completed for the Island Annexation Area, the potential exists for future development to release hazardous materials into the environment through the upset of contaminated soils during ground-disturbing activities, or through the upset of asbestos and/or lead associated with demolition of the existing on-site structures. In addition, the Island Annexation Area may contain wells and septic systems which, if present, would require proper abandonment and destruction prior to future development. Therefore, without mitigation to ensure future development of the Island Annexation Area does not result in the release of hazardous materials into the environment, a potentially significant impact could occur.

Fairway Oaks VTM Site

Construction activities associated with buildout of the Fairway Oaks VTM Site would involve the use of heavy equipment, which would contain fuels and oils, and various other products such as concrete, paints, and adhesives. Small quantities of potentially toxic substances (e.g., petroleum and other chemicals used to operate and maintain construction equipment) would be used at the project site and transported to and from the site during construction. However, the project contractor would be required to comply with all California Health and Safety Codes and local City ordinances regulating the handling, storage, and transportation of hazardous and toxic materials. In addition, compliance with the City's Stormwater Management Program requires the applicant to prepare a SWPPP that includes BMPs for water quality for both during and after construction activities on-site.

However, although not documented at the Fairway Oaks VTM Site, past agricultural activities within the site may have included the use of pesticides, fertilizers, or other chemicals. Agricultural uses could result in concentrations of residual chemicals being present in the near surface soil if use or storage of pesticides, fertilizers, or other chemicals has occurred. Upon development of the Fairway Oaks VTM Site, the site would primarily be covered by pavement and other impervious surfaces, thereby limiting future upset of on-site soils. Nonetheless, issues related to contaminated soils could pose a risk to construction workers during ground-disturbing activities. In addition, the potential exists for the Fairway Oaks VTM Site to contain undocumented wells or septic facilities. Proper abandonment and removal of the facilities, if present, would be required prior to construction. Therefore, without a Phase I ESA, buildout of the Fairway Oaks VTM Site

could result in a potentially significant impact related to upset and accident conditions involving the release of hazardous materials into the environment.

Conclusion

In the absence of a Phase I ESA, the potential exists for contaminated soils, wells, septic systems, and other preexisting environmental hazards to occur within both the Island Annexation Area and the Fairway Oaks VTM Site. Therefore, development of the proposed project could 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, and a ***potentially significant*** impact could occur.

Mitigation Measure(s)

Implementation of the following mitigation measures would reduce the above potential impact to a *less-than-significant* level.

Island Annexation Area and Fairway Oaks VTM Site

IX-1. *Prior to initiation of construction activities, the project applicant shall complete an analysis of on-site soils to determine whether substantial concentrations of organochloride pesticides or other soil contaminants are present above the applicable direct exposure Environmental Screening Levels (ESLs) set by the Regional Water Quality Control Board, the residential screening levels set by the Department of Toxic Substances Control's Human Health Risk Assessment Note 3, and/or the U.S. Environmental Protection Agency's Regional Screening Levels for Region 9. If contaminants are not detected above applicable ESLs/RSLs, then further mitigation is not required. If contaminants are detected above the applicable ESLs/RSLs, then the soils shall be remediated by off-hauling to a licensed landfill facility. Such remediation activities shall be performed by a licensed hazardous waste contractor (Class A) and contractor personnel that have completed 40-hour OSHA hazardous training. The results of soil sampling and analysis, as well as verification of proper remediation and disposal, shall be submitted to the Community Development Department for review and approval.*

IX-2. *Prior to issuance of grading permits, the area proposed for development shall be examined for existing septic systems. If septic systems are not found, no further mitigation is required. In the event of a discovery, the system shall be abandoned in consultation with the Sacramento County Environmental Management Department. Proof of abandonment shall be provided to the City Community Development Department and City Engineer.*

IX-3. *Prior to initiation of any ground disturbance activities, a survey shall be performed to inspect the development area for abandoned wells. If wells are not found, no further mitigation is required. If any wells are found, the applicant shall hire a licensed well contractor to obtain a well abandonment permit from Sacramento County Environmental Management Department and properly abandon the on-site wells to the satisfaction of the Sacramento County Environmental Health Department. Proof of*

abandonment shall be provided to the City Community Development Department and City Engineer.

c. The nearest schools are the Galt Christian School and Fairsite Elementary School, located approximately 250 north of the project site and 600 feet north of the project site, respectively. Although the proposed development of the Fairway Oaks VTM Site and future buildout of the Island Annexation Area would include grading and construction, such activities would not generate significant amounts of dangerous or hazardous materials of concern. In addition, residential uses do not typically involve the routine transport, use, or dispose of hazardous materials, and implementation of Mitigation Measures IX-1 through IX-3 would ensure that impacts related to accidental release or upset of hazardous materials would be less than significant. Therefore, the proposed project would have a ***less-than-significant*** impact related to hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

d. According to the Department of Toxic Substances Control, the project site is not located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.[19] Thus, the proposed project would not create a significant hazard to the public or the environment, and ***no impact*** would occur.

e. The nearest airport to the site is the Lodi Airport, which is located approximately three miles southeast of the site. As such, the project site is not located within two miles of any public airports, and does not fall within an airport land use plan area. Therefore, ***no impact*** would occur related to the project being located within an airport land use plan or within two miles of a public airport or public use airport, thereby resulting in a safety hazard or excessive noise for people residing or working in the project area.

f. **Island Annexation Area**

The Island Annexation Area would retain the current General Plan land use designation for the site and development of the area is not proposed at this time. Considering that the proposed project would not alter the existing land uses within the Island Annexation Area, potential impacts related to impairing the implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan would be consistent with the analysis in the General Plan EIR.

Fairway Oaks VTM Site

During operations, the proposed project would provide adequate access for emergency vehicles on the Fairway Oaks VTM Site and would not interfere with potential evacuation or response routes used by emergency response teams. During construction, all construction equipment would be staged on-site so as to prevent obstruction of local and regional travel routes in the City that could be used as evacuation routes during emergency events. The project would not substantially alter the existing circulation system in the surrounding area.

[19] Department of Toxic Substances Control. *Hazardous Waste and Substances Site List (Cortese).* Available at: https://www.envirostor.dtsc.ca.gov/public/. Accessed January 13, 2020.

Conclusion

Based on the above, the proposed project would not impair implementation of or physically interfere with an existing emergency response plan or emergency evacuation plan. As a result, the project would have a ***less-than-significant*** impact related to such.

g. Issues related to wildfire hazards are discussed in further detail in Section XX, Wildfire, of this IS/MND. As noted therein, the project site is not located within or near a Very High Fire Hazard Severity Zone.[20] In addition, according to the General Plan EIR, portions of the City that are urbanized or used for irrigated agricultural practices are not at high risk for wildland fires. The project site is within an urbanized portion of the City, and therefore, is not subject to high wildfire risk. Therefore, the proposed project would not expose people or structures to the risk of loss, injury or death involving wildland fires, and a ***less-than-significant*** impact would occur.

[20] California Department of Forestry and Fire Protection. *Sacramento County, Very High Fire Hazard Severity Zones in LRA*. July 30, 2008.

X. HYDROLOGY AND WATER QUALITY. *Would the project:*	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	✖	☐	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	✖	☐
c. 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:				
i. Result in substantial erosion or siltation on- or off-site;	☐	✖	☐	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	✖	☐	☐
iii. 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; or	☐	✖	☐	☐
iv. Impede or redirect flood flows?	☐	☐	✖	☐
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	✖
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	✖	☐

Discussion

The Island Annexation Area would retain the current General Plan land use designation and further development of the Island Annexation Area is not proposed at this time. Accordingly, construction activities would not occur within the Island Annexation Area with implementation the proposed project. Should development occur within the Island Annexation Area in the future, all such development would be subject to the relevant regulations within the City's General Plan and Municipal Code, as well as other regulations related to hydrology and water quality, as discussed for the Fairway Oaks VTM below. In addition, given that the proposed project would not alter the existing General Plan land use designation of the Island Annexation Area, future buildout of the area has been anticipated by the City and impacts related to hydrology and water quality have been analyzed in the General Plan EIR. Considering the lack of current development proposals for the Island Annexation Area, as well as the existing regulations related to the protection of water quality, the proposed project would not be anticipated to result in impacts related to water quality due to annexation of the Island Annexation Area. Therefore, the following discussion focuses only on hydrology and water quality impacts resulting from buildout of the Fairway Oaks VTM Site.

a. During the early stages of construction activities, topsoil would be exposed due to grading of the site. After grading and prior to overlaying the ground with impervious surfaces and structures, the potential exists for wind and water erosion to discharge sediment and/or pollutants into stormwater runoff. The discharge of sediment and/or pollutants into stormwater runoff could adversely affect the water quality in the project area.

The City of Galt has a Phase I National Pollutant Discharge Elimination System (NPDES) permit and is part of the Sacramento Stormwater Quality Partnership (SSQP). The City of Galt is regulated by Order No. R5-2002-0206 NPDES No. CAS082597, "*Waste Discharge Requirements for County of Sacramento and Cities of Citrus Heights, Elk Grove, Folsom, Galt and Sacramento Storm Water Discharges from Municipal Separate Storm Sewer Systems Sacramento County*" issued by the Central Valley Regional Water Quality Control Board (CVRWQCB). However, the City of Galt Municipal Separate Storm Sewer System (MS4) is noncontiguous with other MS4s and is surrounded by rural and agricultural areas that are not subject to NPDES regulations.

The City of Galt participates in the County-wide Sacramento Stormwater Quality Improvement Program (SQIP), which was established in 1990 to reduce the pollution carried by stormwater into local creeks and rivers. The SQIP is based on the NPDES municipal stormwater discharge permit. The comprehensive SQIP includes pollution reduction activities for construction sites, industrial sites, illegal discharges and illicit connections, new development, and municipal operations.

Grading and other ground-disturbing activities during construction, as well as implementation of new structures associated with the proposed project, would create the potential to degrade water quality from increased sedimentation and increased discharge (increased flow and volume of runoff) associated with stormwater runoff. Disturbance of site soils would increase the potential for erosion from stormwater. The State Water Resources Control Board (SWRCB) adopted a statewide general NPDES permit for stormwater discharges associated with construction activity. Dischargers whose projects disturb one or more acres of soil are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ. Construction activity subject to the General Permit includes clearing, grading and disturbances to the ground such as stockpiling, or excavation. The proposed project would include disturbance of approximately 40 acres, and, thus, is subject to the relevant requirements within the aforementioned General Permit.

The proposed project would be required to implement all applicable goals, policies and BMP's set forth by the above programs. Construction related to BMPs would likely include, but are not limited to, installation of storm drain inlet protection, stabilization of construction exists, and proper maintenance of material stock piles. The project's compliance with the requirements of the SWRCB, the SQIP, and the City of Galt's Stormwater Management Program would ensure that construction activities, and operation of the project, would not result in degradation of downstream water quality. However, the proposed project's construction activities could result in an increase in erosion, and consequently affect water quality. Compliance with the foregoing requirements is typically demonstrated through implementation of a SWPPP. However, a SWPPP has not yet been prepared for the project. Without preparation of a SWPPP, proper implementation of BMPs cannot be ensured at this time, and the proposed project's construction activities could result in an increase in erosion, and consequently affect water quality. Therefore, a ***potentially significant*** impact related to water quality and waste discharge requirements would result.

Mitigation Measure(s)

Implementation of the following mitigation measure would reduce the above potential impact to a *less-than-significant* level.

Fairway Oaks VTM Site

X-1. *Prior to the issuance of grading permits, the developer shall obtain and comply with the NPDES general construction permit including the submittal of a Notice of Intent (NOI) and associated fee to the SWRCB and the preparation of a SWPPP that includes both construction stage and permanent storm water pollution prevention practices to be submitted to the City Engineer for review.*

b,e. Water service for the Fairway Oaks VTM Site would be supplied by the City of Galt. Per the City's 2015 Urban Water Management Plan (UWMP),[21] the City's groundwater is derived from the Cosumnes Subbasin, which is part of the San Joaquin Valley Groundwater Basin. Despite growth within the City of Galt and on-going groundwater dependency, monitored groundwater levels within the City have shown little change in depth to groundwater since 1961. The UWMP concludes that groundwater resources within the City are anticipated to be sufficient at least through the year 2040. Increases in demand for groundwater that occur with buildout of the City, including buildout of the Fairway Oaks VTM Site, can be met through continued pumping from existing wells and the construction of new wells as needed.[22] The proposed project is consistent with the General Plan land use designations. Thus, the demands associated with buildout of the Fairway Oaks VTM Site have been anticipated by the City and analyzed in the General Plan EIR.

Given that the Fairway Oaks VTM Site is a relatively small area compared to the size of the groundwater basin, the site does not currently represent a substantial source of groundwater recharge. In addition, the proposed landscaped areas within the Fairway Oks VTM Site would continue to allow stormwater runoff to percolate into underlying soils, thereby contributing to groundwater recharge. Because the Fairway Oaks VTM Site has been previously designated for urban development, the loss of groundwater infiltration at the site due to development has been previously anticipated in the General Plan EIR.

Based on the above, the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, the proposed project would result in a ***less-than-significant*** impact with respect to substantially decreasing groundwater supplies or interfering substantially with groundwater recharge such that the project would impede sustainable groundwater management of the basin.

ci-iii. Implementation of the proposed project would involve grading of the Fairway Oaks VTM Site and development of 173 residential units. Such development would increase the amount of impervious surfaces within the project site. Considering the amount of impervious area would increase, altered drainage patterns could increase the rate or amount of runoff on- and off-site.

The proposed project includes a storm drain system that would convey stormwater on the Fairway Oaks VTM Site within a network of stormwater pipes connecting to an existing 72-inch storm drain at the eastern border of the project site. The on-site drainage system would be required to comply with the Sacramento Stormwater Quality Partnership (SSQP) standards for residential development projects greater than 20 acres. Because the

[21] City of Galt. *2015 Urban Water Management Plan Update*. June 2016.
[22] City of Galt. *2015 Urban Water Management Plan Update*. June 2016.

Fairway Oaks VTM Site is 50.5 acres, the project would be subject to SSQP standards and would be required to provide stormwater quality treatment for associated runoff.

Nonetheless, given that the proposed project would add impervious surfaces to the area, such as parking areas, roadways, and structures, the project could substantially alter the existing drainage pattern of the site or area in a manner which would result in substantial erosion or siltation on- or off-site, substantially increasing the rate or amount of surface runoff in a manner which would result in flooding on- or offsite, or creating or contributing runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, the proposed project could result in a ***potentially significant*** impact.

Mitigation Measure(s)

Implementation of the following mitigation measure would reduce the above potential impact to a *less-than-significant* level.

Fairway Oaks VTM Site

X-2. *Prior to issuance of grading permits, the applicant shall develop and submit a stormdrain model to analyze the existing stormdrain system and a Drainage Master Plan to the City Engineer for review and approval. The Drainage Master Plan shall describe how on-site draining systems will be designed to compensate for the reduced water absorption capacity of the site and to prevent flooding of adjacent properties. The Plan must ensure that all stormwater entering or originating within the project site shall be conveyed, without diversion of the watershed, to the nearest adequate, natural watercourse, or adequate man-made drainage facility. The Drainage Master Plan shall implement BMPs to control quality of stormwater runoff.*

civ. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map for the project site, the project site is located within an "Area Determined to be Outside the 0.2% Annual Chance Floodplain" (Zone X).[23] The site is not classified as a Special Flood Hazard Area or otherwise located within a 100-year or 500-year floodplain. The strip of land along Dry Creek is classified as a Special Flood Hazard Area. However, the proposed project would not involve placement of any structures on Dry Creek or the associated floodplain. In addition, the proposed project would not conflict with the goals and strategies established in the Central Valley Flood Protection Plan.[24] Therefore, development of the proposed project would not impede or redirect flood flows and ***less-than-significant*** impact would result.

d. As discussed under question 'civ' above, the project site is not located within a flood hazard zone. Tsunamis are defined as sea waves created by undersea fault movement, whereas a seiche is a long-wavelength, large-scale wave action set up in a closed body of water such as a lake or reservoir. The project site is not located in proximity to a coastline and would not be potentially affected by flooding risks associated with tsunamis. Seiches do not pose a risk to the proposed project, as the project site is not located adjacent to a large closed body of water. Based on the above, the proposed project would

23 Federal Emergency Management Agency. *Sacramento County, California Flood Insurance Rate Map 06067C0606J.* Effective October 20, 2016.

24 Department of Water Resources. *Central Valley Flood Protection Plan, 2017 Update.* August 2017.

not pose a risk related to the release of pollutants due to project inundation due to flooding, tsunami, or seiche, and ***no impact*** would occur.

XI. LAND USE AND PLANNING. *Would the project:*	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Physically divide an established community?	☐	☐	✖	☐
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	✖	☐

Discussion

a. A project risks dividing an established community if the project would introduce infrastructure or alter land use so as to change the land use conditions in the surrounding community or isolate an existing land use. Land uses within the Island Annexation Area would remain unchanged with implementation of the proposed project. Implementation of the Fairway Oaks VTM Project would include the development of approximately 173 single-family residences in the southern portion of the City of Galt. Surrounding land uses include residential to the north and south, undeveloped land to the west, and SR 99 to the east. The proposed project would be consistent with the surrounding urban development, and would not isolate an existing land use. Accordingly, buildout of the Fairway Oaks VTM and future buildout of the Island Annexation Area would not result in a division of an established community. Furthermore, the proposed development on the Fairway Oaks VTM Site and any future development on the Island Annexation Area would be consistent with the City's General Plan land use designations. As such, impacts associated with buildout of the Fairway Oaks VTM and future buildout of the Island Annexation Area related to land use and planning have been previously analyzed in the General Plan EIR, and would not be more severe than what was previously anticipated. As such, the proposed project would not physically divide an established community and a ***less-than-significant*** impact would occur.

b. Development of the Fairway Oaks VTM Site with residences and an 11-acre open space zone would be consistent with the site's General Plan land use designations of Low Density Residential and Open Space. It should be noted that the proposed project would include a rezone of the Fairway Oaks VTM Site from R1C and R1B to RIC-PD. However, the proposed zoning would remain consistent with the General Plan land use designation for the site and remain consistent with the surrounding land uses. The proposed project would not involve any changes to the land use designations assigned to the Island Annexation Area. A such, future development within the Island Annexation Area has been previously anticipated by the City and analyzed in the General Plan EIR.

In addition, the proposed project would not conflict with any City policies and regulations adopted for the purpose of avoiding or mitigating an environmental effect. For example, the proposed project would comply with the City of Galt General Plan Noise Element. Additionally, as discussed in Section IV, Biological Resources, of this IS/MND, the project site is located within the jurisdiction of the SSHCP.[25] As such, the project would be required to comply with all mitigation measures provided therein. The proposed Fairway Oaks VTM and future buildout of the Island Annexation Area would be required to comply with all applicable General Plan policies and the development standards established by

[25] County of Sacramento, City of Rancho Cordova, City of Galt, Sacramento County Water Agency, Southeast Connector Joint Powers Authority. *Final South Sacramento Habitat Conservation Plan.* February 2018.

Title 18 of the City's Municipal Code, which includes standards regarding maximum lot coverage, building heights, and building setback requirements.

Furthermore, the proposed project would not conflict with any LAFCo standards or policies regarding annexations. In order for LAFCo to make determinations required under Section 56668 of the Cortese-Knox-Hertzberg Local Government Reorganization Act (CKH) (Government Code Section 56000 et seq.), further analysis and discussion regarding the extent to which the proposed annexation would contribute to environmental justice, as well as the project's consistency with SACOG's Blueprint Project is provided below.

In addition, LAFCo has requested a discussion regarding affordable housing. However, the City of Galt has not yet adopted an affordable housing ordinance, and such concerns are not a CEQA issue. Thus, a discussion regarding affordable housing is not included within this IS/MND, but would be provided as part of the City's approval process.

Environmental Justice

Environmental justice is not a CEQA issue and is not required to be analyzed. Nonetheless, a brief summary of the topic related to the proposed project is provided for LAFCo's informational purposes. The CKH states in Government Code Section 56668(o) that "environmental justice" means the fair treatment of people of all races, cultures, and incomes with respect to the location of public facilities and the provision of public services. With approval of the proposed annexation into the City of Galt, all future public services would be provided to the Island Annexation Area by the City of Galt. Therefore, the proposed project would not result in environmental injustice issues with respect to the provision of public services. In addition, as discussed in the Public Services, Recreation, and Utilities and Services sections of this IS/MND, all impacts related to public services and utilities would be less-than-significant.

SACOG's Blueprint Project

The SACOG Board of Directors adopted the "Preferred Blueprint Scenario" in December 2004, which is a vision for growth in the Sacramento region. The Preferred Blueprint Scenario is comprised of the following seven growth principles:

- Transportation Choices;
- Mixed-Use Development;
- Compact Development;
- Housing Choice and Diversity;
- Use of Existing Assets;
- Quality Design; and
- Natural Resources Conservation.

The proposed project does not include any development within the Island Annexation Area at this time. However, future development within the Island Annexation Area would be encouraged to abide by the aforementioned growth principles. Pursuant to General Plan Policy C-6.1, future development would establish a safe and interconnected bicycle and pedestrian system. For instance, all arterial streets would be required to include bicycle infrastructure. In addition, future residences would comply with General Plan Policy COS-7.4, which requires new development to be designed to minimize energy consumption and reduce greenhouse gas emissions. The Island Annexation Area is located in close

proximity to existing development within the City of Galt, which would allow future residents to easily access existing amenities and services.

Sacramento LAFCo Standards

Table 5 includes a comparison of the proposed annexation to relevant Sacramento LAFCo policies and standards as found in Chapter V of the *Sacramento LAFCo Policy, Standards and Procedures Manual*. As demonstrated in Table 5, the proposed annexation is generally consistent with the standards set forth by Sacramento LAFCo. Ultimately, the reorganization is a discretionary action by Sacramento LAFCo. Therefore, the proposed project would have a less-than-significant impact.

Conclusion

Based on the above, the project would not cause a significant environmental impact due to conflicts with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, a ***less-than-significant*** impact would occur.

Table 5
Sacramento LAFCo Policy Discussion

Policy	Project Consistency
1. LAFCo will utilize Spheres of Influence through application of the following standards: a. The LAFCo will approve an application for annexation only if the proposal conforms to and lies wholly within the approved Spheres of Influence boundary for the affected agency; b. The LAFCo generally will not allow Spheres of Influence to be amended concurrently with annexation proposals; c. The LAFCo will favorably consider proposals that are a part of an orderly, phased annexation program by an agency for territory within its Sphere of Influence; d. An annexation must be consistent with a city's Master Services Plan Element of its Sphere of Influence Plan; and e. The LAFCo encourages the annexation to each city of all islands of unincorporated territory and all substantially surrounded unincorporated areas located within the city's Sphere of Influence.	a. The project site is located completely within the City of Galt's SOI and is within the City of Galt General Plan Planning Area. b. The proposed project does not include an SOI amendment. c. The project site is anticipated for development and the impacts of such have been analyzed in the City's General Plan EIR as well as the SOI EIR; therefore, the project site is part of the City's long-range vision for community expansion and development. In addition, the proposed Island Annexation Area is currently an island of unincorporated territory within the City's Planning Area and SOI; thus, proposed project is consistent with LAFCo's goal of orderly annexation. d. An updated Municipal Services Review would be submitted to the Sacramento LAFCo at such time the annexation process has been initiated. e. The proposed Island Annexation Area is currently an island of unincorporated territory and is located completely within the City of Galt's SOI. As such, annexation of the existing County island would comply with LAFCo's encouraged annexation of unincorporated islands.
2. The LAFCo will not approve proposals in which boundaries are not contiguous with the existing boundaries of the City to which the territory will be annexed, unless the area meets all of the following requirements: a. Does not exceed 300 acres; b. Is owned by the City; c. Is used for municipal purposes; and d. Is located within the same county as the city.	The Island Annexation Area is an island of County land within the City of Galt's SOI and Planning Area. Therefore, annexation of the site would remain contiguous with the existing City boundaries.
3. The LAFCo will favorably consider proposals to annex streets where adjacent municipal lands will generate additional traffic and where there are isolated sections of county road that will result from an annexation proposal.	All roadways included in the proposed annexation would be maintained by the City following annexation. The proposed annexation would include the incorporation of portions of Church Street and Lincoln Way. However, the

Table 5
Sacramento LAFCo Policy Discussion

Policy	Project Consistency
Cities shall annex a roadway portion when 50 percent of the property on either or both sides of the street is within the City.	majority of such streets are already under City ownership, and over 50 percent of the property on both sides of the streets are within the City.
4. The LAFCo will favorably consider annexations with boundary lines located so that all streets and rights-of-way will be placed within the same city as the properties which either abut thereon or for the benefit of which such streets and rights-of-way are intended.	Because the Island Annexation Area is an existing island of County land, the area is surrounded by the City of Galt land on all sides. Therefore, annexation of the Annexation Area would ensure that all streets and rights of way would remain within the same City as the adjacent properties.
5. An annexation may not result in islands of incorporated or unincorporated territory or otherwise cause or further the distortion of existing boundaries unless it is determined that the annexation as proposed is necessary for orderly growth, and cannot be annexed to another city or incorporated as a new city. Annexations of territory must be contiguous to the annexing city. Territory is not contiguous if its only connection is a strip of land more than 300 feet long and less than 200 feet wide.	The proposed Island Annexation Area is currently an island of unincorporated territory within the City's Planning Area and SOI. As such, annexation of the County island would not result in any islands of incorporated or unincorporated territory, and would instead improve the continuity of the City limits.
6. The LAFCo opposes extension of services by a City without annexation, unless such is by contract with another governmental entity or a private utility.	The extension of services resultant from the proposed project would be part of the annexation process, or contingent on future development of those properties within the Island Annexation Area following annexation into the City.
Reorganization	
1. LAFCo will strive to ensure that each separate territory included in the proposal, as well as affected neighboring residents, tenants, and landowners, receive services of an acceptable quality from the most efficient and effective service provider after the reorganization is complete.	With annexation of the Island Annexation Area into the City of Galt, the City of Galt would provide municipal services to the site. Future development within the Island Annexation Area would be consistent what has already been anticipated and analyzed by the City in the GPU EIR. Because the City of Galt currently provides utilities services in the vicinity of the project site and the City has already anticipated and analyzed the demand for utilities associated with buildout of the Island Annexation Area, the City would be able to efficiently and effectively extend services to the proposed project upon annexation of the site.
2. The service quality, efficiency and effectiveness available prior to reorganization shall constitute a benchmark for determining significant adverse effects upon an interested party. The LAFCo will approve a proposal for reorganization which results in this type of significant adverse effects only if effective measures are included in the proposal.	The City of Galt currently provides sufficient services to all properties within the existing city limits and would continue to provide equivalent, if not greater service, to the existing City and any future development on the Island Annexation Area upon annexation into the City of Galt.

XII. MINERAL RESOURCES. *Would the project:*		Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a.	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	✖
b.	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?	☐	☐	☐	✖

Discussion

a,b. The proposed project would be consistent with the General Plan land use designations for the site, and buildout of the General Plan was determined to result in less-than-significant impacts to mineral resources per General Plan EIR. Furthermore, according to the Sacramento County General Plan, the mineral resource zone closest to Galt is located near New Hope Road, over four miles west of the project site.[26] Therefore, the project site does not contain mineral resources, and the proposed project would not result in the loss of availability of any known mineral resources or mineral resource recovery sites, and ***no impact*** to mineral resources would occur.

[26] County of Sacramento. *County of Sacramento General Plan, Conservation Element* [pg. 15]. Amended September 26, 2017.

XIII. NOISE. *Would the project result in:*	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Generation of a substantial temporary or 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?	☐	✖	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	✖	☐
c. 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, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	✖

Discussion

The Island Annexation Area would retain the current General Plan land use designation and further development of the Island Annexation Area is not proposed at this time. Accordingly, construction activities would not occur within the Island Annexation Area with implementation the proposed project. Should development occur within the Island Annexation Area in the future, all such development would be subject to the relevant regulations within the City's General Plan and Municipal Code, as well as other regulations related to noise and vibration, as discussed for the Fairway Oaks VTM below. In addition, given that the proposed project would not alter the existing General Plan land use designation of the Island Annexation Area, future buildout of the area has been anticipated by the City and impacts related to noise have been analyzed in the General Plan EIR. Considering the lack of current development proposals for the Island Annexation Area, the proposed project would not be anticipated to result in impacts related to noise due to annexation of the Island Annexation Area. Therefore, the following discussion focuses only on noise impacts resulting from buildout of the Fairway Oaks VTM Site.

The following discussion is based on an Environmental Noise and Vibration Assessment prepared for the proposed project by Bollard Acoustical Consultants, Inc (see Appendix D).[27] It should be noted that the Environmental Noise and Vibration Assessment was performed for an earlier submittal of the project that included 169 units in a slightly different orientation rather than the currently proposed 173 units. The increase of four units would not modify the conclusions of the Environmental Noise and Vibration Assessment presented below.

a. The following sections present information regarding sensitive noise receptors in proximity to the project site, the existing noise environment, and the potential for the proposed project to result in impacts during project construction and operation. The following terms are referenced in the sections below:

- Decibel (dB): A unit of sound energy intensity. An A-weighted decibel (dBA) is a decibel corrected for the variation in frequency response to the typical human ear at commonly encountered noise levels. All references to decibels (dB) in this report will be A-weighted unless noted otherwise.

[27] Bollard Acoustical Consultants, Inc. *Environmental Noise and Vibration Assessment: Fairway Oaks Residential Development – Galt, California*. February 27, 2020.

- Average, or equivalent, sound level (L_{eq}): The L_{eq} corresponds to a steady-state A weighted sound level containing the same total energy as a time varying signal over a given time period (usually one hour).
- Day-Night Average Level (L_{dn}): The average sound level over a 24-hour day, with a +10 decibel weighing applied to noise occurring during nighttime (10:00 PM to 7:00 AM) hours.

Sensitive Noise Receptors

Some land uses are considered more sensitive to noise than others, and, thus, are referred to as sensitive noise receptors. Land uses often associated with sensitive noise receptors generally include residences, schools, libraries, hospitals and passive recreational areas. Noise sensitive land uses are typically given special attention in order to achieve protection from excessive noise. The sensitive noise receptors closest to the project site are the single-family residences located to the north and west of the project site.

Noise Standards

The Noise Element of the 2030 Galt General Plan contains policies to ensure that residents are not subjected to noise beyond acceptable levels. Relevant policies that are applicable to the proposed project are presented below. In addition, the General Plan establishes an interior noise level standard of 45 dB L_{dn} or less within noise-sensitive residential dwellings.

- **Policy N-1.1**: Noise-Generating Uses: The City shall work to reduce noise levels and land use conflicts surrounding existing noise generating uses.
- **Policy N-1.2**: Noise Mitigation: The City shall develop and implement effective strategies to abate and avoid excessive noise exposures in the city by requiring that effective noise mitigation measures be incorporated in the design of new noise-generating and new noise-sensitive land uses.
- **Policy N-1.3**: Neighborhood Noise Protection: The City shall protect areas within the city where the present noise environment is within acceptable limits.
- **Policy N-1.4**: Noise Level Performance Standards: The City shall use noise level performance standards for reviewing development proposals.
- **Policy N-1.8**: Development near Major Roadways and Thoroughfares: The City shall require noise mitigation for new sensitive receptors near major roadways and thoroughfares by requiring noise buffering and/or special construction techniques (e.g., increased insulation, special windows, etc.) in new construction.
- **Policy N-1.9**: Sound Attenuation Features: The City shall require sound attenuation features such as walls, berms, and distance separation between commercial, and residential uses to reduce noise and vibration impacts.
- **Policy N-1.10**: Noise Mitigation: The City shall require noise mitigation in new development along major streets, highways, and railroad tracks.
- **Policy N-1.11**: Land Use Compatibility: The City shall allow the development of noise-sensitive land uses which include, but are not limited to, residential neighborhoods, schools, and hospitals, only in areas where existing or projected noise levels are “acceptable.” Noise mitigation measures may be required to reduce noise in outdoor activity areas and interior spaces to achieve these levels.

The City of Galt General Plan Noise Element establishes a noise level standard of 60 dB as normally acceptable at residential land uses. Noise levels up to 70 dB are considered

conditionally acceptable for residential uses. The City of Galt considers the following significance criteria for noise impacts:

- If the noise level resulting from project operations would exceed the "normally acceptable" range for a given land use where the existing noise level exceeds the normally acceptable range, a 3 dB L_{dn} or greater increase due to a project is considered significant; and
- If the noise level resulting from project operations would exceed the "normally acceptable" range for a given land use where the existing noise level is within the normally acceptable range, a 5 dB L_{dn} or greater increase due to a project is considered significant; and
- If the noise level resulting from project operations would be within the "normally acceptable" range for a given land use, a 10 dB L_{dn} or greater increase due to a project is considered significant.

In addition to General Plan standards noted above, Section 8.40.040 of the City's Municipal Code outlines criteria for "non-transportation" or "locally regulated" noise sources. The noise level performance standards for non-transportation noise in the City of Galt are shown in Table 6 below.

Table 6
Noise Level Performance Standards for Residential Areas Affected by Non-Transportation Noise

Noise Level Descriptor	Exterior Noise Level Standards, dBA	
	Daytime (7 AM-10 PM)	Nighttime (10 PM-7 AM)
Hourly L_{eq}, dB	50	45
Maximum Level, dB	70	65

Source: City of Galt Municipal Code.

Section 8.40.60 specifies that construction noise is exempt from the Noise Control Standards, under the following conditions:

> "Noise sources associated with construction, repair, remodeling, demolition, paving or grading of any real property, provided the activities take place between the hours of 6:00 a.m. and 8:00 p.m. on weekdays and 7:00 a.m. and 8:00 p.m. on Saturdays and Sundays. Provided, however, when an unforeseen or unavoidable condition occurs during a construction project and the nature of the project necessitates that work in process be continued until a specific phase is completed, the contractor or owner shall be allowed to continue work after 8:00 p.m. and to operate machinery and equipment as necessary until completion of the specific work in progress can be brought to conclusion under conditions which will not jeopardize inspection acceptance or create undue financial hardships for the contractor or owner. Provided further, however, from June through September, the pouring of concrete may occur starting at 5:00 a.m. on weekdays."

Existing Noise Environment

The existing ambient noise environment at the Fairway Oaks VTM Site is defined primarily by traffic noise from SR 99. To assess the existing ambient noise level environment, Bollard Acoustical Consultants, Inc. used noise level data from a long term, 24-hour noise level survey that was previously conducted on the Fairway Oaks VTM Site in September of 2017. The survey location is shown in Figure 7.

Figure 7
Noise Survey Locations

Results of the noise level survey are summarized Table 7 below. The data presented below indicates that the measured L_{dn} at the survey site exceeded the normally acceptable exterior noise level standard of 60 dB set forth in the General Plan.

Table 7
Summary of Long-Term Ambient Noise Measurement Results

		Average Measured Hourly Noise Levels (dB)			
		Daytime (7 AM to 10 PM)		Nighttime (10 PM to 7 AM)	
Location	L_{dn}	L_{eq}	L_{max}	L_{eq}	L_{max}
LT-1: Approximately 100' from centerline of SR 99	82	78	89	75	87

Source: Bollard Acoustical Consultants, Inc., 2020.

Project Construction Noise

During construction associated with the proposed Fairway Oaks VTM, heavy-duty equipment would be used for demolition, grading, excavation, paving, and building construction, which would result in temporary noise level increases while in operation. Noise levels would vary depending on the type of equipment used, how the equipment is operated, and how well the equipment is maintained. In addition, noise exposure at any single point outside the Fairway Oaks VTM Site would vary depending on the proximity of construction activities to that point. Standard construction equipment, such as graders, backhoes, loaders, and haul trucks would be used on-site. The nearest existing sensitive receptors are the residences to the north and west of the Fairway Oaks VTM Site, located approximately 30 feet away from where construction activities would occur.

Based on typical construction equipment noise levels provided in the Environmental Noise & Vibration Assessment, the worst-case construction equipment noise levels at the property lines of the nearest existing residence are expected to range from approximately 80 to 94 dB. Thus, the potential exists for a portion of the construction equipment to result in a short-term increase in ambient noise levels at the nearest existing sensitive receptor.

As noted above, Section 8.40.060 of the Galt Municipal Code exempts noise from construction activities provided the activities occur between the hours of 6:00 AM and 8:00 PM on weekdays and 7:00 AM and 8:00 PM on Saturdays and Sundays. Thus, as long as construction activities occur between such hours, construction would be exempt from the noise ordinance. However, if construction activities were to occur during the hours not exempted by the Noise Control Standards, noise levels generated by construction activities would likely exceed applicable Municipal Code noise standards at the nearest residences. As a result, noise impacts associated with construction activities are identified as being potentially significant.

Project Operational Noise

The primary noise sources associated with the proposed project would be increased traffic noise along local roadways. Residential uses are not typically associated with substantial stationary (i.e., non-traffic) noise sources. Transportation related noise at sensitive receptors is discussed in further detail below.

Traffic Noise at Existing Sensitive Receptors

Based on the traffic volumes presented in Section XVII, Transportation, of this IS/MND, Bollard Acoustical Consultants, Inc. calculated the traffic noise level increases anticipated to occur on local roadways under Existing Plus Project and Cumulative Plus Project conditions (see Table 8 and Table 9) using the Federal Highway Administration (FHWA) Traffic Noise Model.

It should be noted that while both tables show traffic noise levels at a distance of 100 feet from the reference roadway centerline, existing sensitive land uses within the project vicinity are located varying distances from the centerlines of the local roadway network. The 100-foot reference distance is used in this analysis to provide a reference position at which changes in existing and future traffic noise levels resulting from the project can be evaluated. Furthermore, actual noise levels may vary based on factors such as roadway curvature, roadway grade, shielding from local topography or structures, elevated roadways, or elevated receivers.

As shown in the tables, traffic generated by the Fairway Oaks VTM would not result in a substantial increase of traffic noise levels on the local roadway network, under either Existing Plus Project or Cumulative Plus Project conditions. Thus, a less-than-significant impact would occur related to traffic noise increases at existing sensitive receptors.

Traffic Noise at New Sensitive Receptors

Recent rulings by the California Supreme Court have clarified that environmental analyses prepared under CEQA are intended to analyze a project's impact on the environment, rather than the potential impact of the environment on the project. In the case of the proposed project, potential impacts related to future traffic noise on new sensitive receptors within the Fairway Oaks VTM Site, such as the proposed residences, would be an example of impacts of the environment on the project. Consequently, impacts of noise on future on-site receptors would not typically be considered a required topic of analysis under CEQA. Nevertheless, the City has elected to prepare an analysis of potential noise-related impacts on future residences within the Fairway Oaks VTM Site to ensure that the proposed project complies with all City regulations intended to protect the health and welfare of the citizens of Galt. Under the 2030 Galt General Plan, residential uses are considered normally acceptable in ambient noise environments up to 60 dBA L_{dn}, and conditionally acceptable in noise environments up to 70 dBA L_{dn}.

The calibrated FHWA Model was used with future traffic data to predict traffic noise levels at the project site. The future Average Daily Traffic (ADT) for SR 99 was conservatively estimated by increasing the existing ADT volume by a factor of 50 percent to account for regional growth through 2040. The existing (2017) ADT volume for SR 99 was obtained from published Caltrans traffic volume data. The predicted future traffic noise levels at the Fairway Oaks VTM Site are summarized in Table 10 below, accounting for shielding provided by eight-foot-tall concrete masonry unit (CMU) barriers that are proposed along portions of the lots nearest to SR 99.

As shown in the table, future SR 99 traffic noise levels are predicted to exceed the City of Galt exterior noise standard of 60 dB L_{dn} at portions of the proposed outdoor activity areas (backyards) nearest to the roadway, including the shielding provided by the proposed eight-foot tall CMU wall as indicated on Figure 8. Thus, a potentially significant impact could occur related to conflicting with the City's exterior noise level standards.

Table 8
Traffic Noise: Existing Plus Project Conditions

Segment	Intersection	Direction	Traffic Noise Level at 100 feet from Centerline (dB L_{dn})			Substantial Increase?
			Existing	Existing Plus Project	Increase	
1	Lincoln Way/Kost Road	North	57.3	57.5	0.2	No
2		South	62.5	62.6	0.1	No
3		East	--	--	--	--
4		West	57.7	57.8	0.1	No
5	Lincoln Way/Ranch Road	North	60.3	60.4	0.1	No
6		South	57.2	57.5	0.3	No
7		East	48.8	49.7	0.9	No
8		West	--	--	--	--
9	Lincoln Way/Cornell Road	North	56.9	57.0	0.1	No
10		South	60.4	60.5	0.1	No
11		East	39.9	43.4	3.5	No
12		West	--	--	--	--
13	Lincoln Way/C Street	North	56.8	57.0	0.2	No
14		South	56.9	57.2	0.3	No
15		East	58.6	58.6	0.0	No
16		West	53.6	53.7	0.1	No
17	Glendale Ave/SR 99 SB Ramps	North	52.4	54.9	2.5	No
18		South	53.1	53.9	0.8	No
19		East	--	--	--	--
20		West	48.1	50.9	2.8	No
21	Fairway Drive/C Street	North	59.6	57.7	-1.9	No
22		South	58.9	59.4	0.5	No
23		East	62.1	62.2	0.1	No
24		West	60.8	60.1	-0.7	No
25	A Street/SR 99 SB Off-Ramp	North	58.9	59.0	0.1	No
26		South	58.3	58.3	0.0	No
27		East	58.7	58.7	0.0	No
28		West	60.6	60.6	0.0	No
29	C Street/SR 99 NB Off-Ramp	North	59.4	59.5	0.1	No
30		South	58.2	58.4	0.2	No
31		East	60.3	60.4	0.1	No
32		West	62.7	62.9	0.2	No
33	A Street/SR 99 NB Off-Ramp	North	59.9	60.1	0.2	No
34		South	59.4	59.5	0.1	No
35		East	49.1	49.1	0.0	No
36		West	58.7	58.7	0.0	No

Note: Blank entries are roadway segments for which traffic data was not available.

Source: Bollard Acoustical Consultants, Inc., 2020.

Table 9
Traffic Noise: Cumulative Plus Project Conditions

Segment	Intersection	Direction	Traffic Noise Level at 100 feet from Centerline (dB L_{dn})			Substantial Increase?
			Cumulative No Project	Cumulative Plus Project	Increase	
1	Lincoln Way/Kost Road	North	59.3	59.4	0.1	No
2		South	64.0	64.1	0.1	No
3		East	--	--	--	--
4		West	58.6	58.7	0.1	No
5	Lincoln Way/Ranch Road	North	62.2	62.3	0.1	No
6		South	59.3	59.4	0.1	No
7		East	49.3	50.1	0.8	No
8		West	--	--	--	--
9	Lincoln Way/Cornell Road	North	58.6	58.8	0.2	No
10		South	62.2	62.3	0.1	No
11		East	42.2	44.6	2.4	No
12		West	--	--	--	--
13	Lincoln Way/C Street	North	59.1	59.3	0.2	No
14		South	58.9	59.1	0.2	No
15		East	60.6	60.6	0.0	No
16		West	55.9	55.9	0.0	No
17	Glendale Ave/SR 99 SB Ramps	North	54.3	56.1	1.8	No
18		South	53.8	54.9	1.1	No
19		East	--	--	--	--
20		West	49.3	51.9	2.6	No
21	Fairway Drive/C Street	North	60.5	60.5	0.0	No
22		South	62.4	62.7	0.3	No
23		East	65.8	65.8	0.0	No
24		West	62.2	62.3	0.1	No
25	A Street/SR 99 SB Off-Ramp	North	59.6	59.7	0.1	No
26		South	61.1	61.2	0.1	No
27		East	64.6	64.6	0.0	No
28		West	63.7	63.7	0.0	No
29	C Street/SR 99 NB Off-Ramp	North	62.6	62.2	-0.4	No
30		South	61.7	61.8	0.1	No
31		East	65.1	65.1	0.0	No
32		West	66.6	66.5	-0.1	No
33	A Street/SR 99 NB Off-Ramp	North	60.1	60.2	0.1	No
34		South	62.1	62.2	0.1	No
35		East	64.9	64.9	0.0	No
36		West	64.6	64.6	0.0	No

Note: Blank entries are roadway segments for which traffic data was not available.

Source: Bollard Acoustical Consultants, Inc., 2020.

Table 10
Future Exterior Traffic Noise Levels at Lots Nearest to SR 99

Lots	Distance from Roadway (feet)[1]			Predicted Noise Levels, L_{dn} (dB)[2]		
	Backyard	1st Floor Facade	Upper-Floor Facade	Backyard	1st Floor Facade	Upper-Floor Facade
18	460	470	470	59	60	71
21	310	320	320	66	67	77
24-33	140	150	150	73	72	82
34	140	150	150	79	79	82
35	350	320	320	67	71	74
57	410	420	420	66	66	69
58	615	550	550	62	62	67

[1] Distances were measured from the identified location to the centerline of SR 99.
[2] Calibration adjustments were applied due to predicted traffic noise levels to account for the difference in measured versus modeled existing traffic noise levels.

Source: Bollard Acoustical Consultants, Inc., 2020.

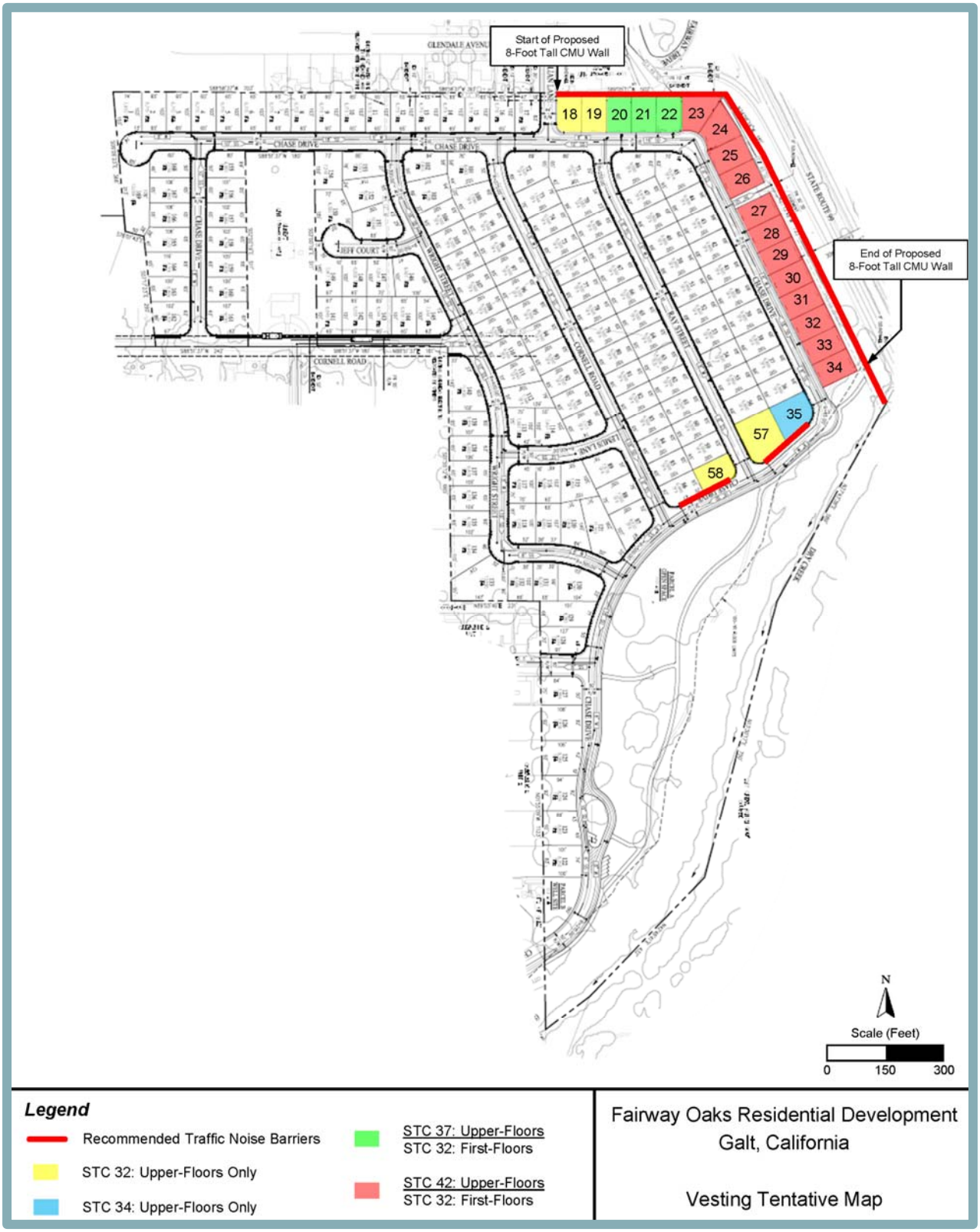
With regard to interior noise levels, standard building construction (stucco siding, STC-27 windows, door weather-stripping, exterior wall insulation, composition plywood roof), typically results in an exterior to interior noise reduction of approximately 25 dB with windows closed and approximately 15 dB with windows open.

As indicated in Table 10, future SR 99 traffic noise levels are predicted to range from 60 to 79 dB L_{dn} at first-floor building facades of the residences proposed nearest to SR 99, including shielding provided by the proposed eight-foot tall CMU noise barriers. Due to reduced ground absorption at elevated positions, and lack of shielding provided by the proposed barriers, future SR 99 traffic noise levels at upper-floor building facades are predicted to range from 71 to 82 dB L_{dn}. Therefore, standard building construction practices would not be sufficient to meet the City's 45 dB L_{dn} interior noise level standard at upper floors. In addition, while first-floor exterior noise levels are expected to be reduced to 70 dB L_{dn} or less after construction of the noise barriers required to achieve satisfaction with the City of Galt's noise standards, standard construction practices would not provide a sufficient margin of safety; thus, the City has determined that for both upper floors and lower floors of residences located closest to SR 99, a significant impact could occur related to conflicting with the City's interior noise level standards.

Conclusion

Based on the above, operation of the proposed project would not result in the generation of a substantial temporary or permanent increase in ambient noise levels at existing sensitive receptors in excess of standards established in the City's General Plan and the Municipal Code. However, construction noise could result in a significant impact, should activities occur outside the normal daytime hours, and construction noise levels at nearby sensitive receptors could exceed the City's noise standards. In addition, noise levels at the proposed residential lots located closest to SR 99 could exceed the City's exterior and interior noise level standards. Therefore, a ***potentially significant*** impact could occur.

Figure 8
Noise Barrier Locations



Mitigation Measure(s)

Mitigation Measure XIII-1 would ensure that construction noise associated with buildout of the Fairway Oaks VTM Site would be reduced to the maximum extent feasible. Mitigation Measure XIII-2 requires installation of CMU noise barriers at the locations shown in Figure 8. As shown in Table 11 below, provision of a range of different barrier heights would be sufficient to meet the City's standards. As noted above, the Environmental Noise and Vibration Assessment was performed for an earlier submittal of the project that included a slightly different orientation than currently proposed. In particular, the lots along the open space area in the northeastern portion of the site are proposed to be front-on, as opposed to the previous iteration that had the lots facing the side streets. Based on the orientation changes, the recommended barriers at those locations may not be required; however, an additional analysis must be conducted in order to confirm. Mitigation Measures XIII-3 and XIII-4 include additional requirements related to sound-proofed windows and provision mechanical ventilation, which would be sufficient to meet the City's interior noise level standards.

Table 11
Future Exterior Traffic Noise Levels at Lots Nearest to SR 99 – Mitigated

Lots	Minimum Barrier Height Required to Satisfy City Noise Standards (feet)		
	70 dB L_{dn}	65 dB L_{dn}	60 dB L_{dn}
21	--	9	14
24-33	11	19	--
34	11	19	--
35	--	6	7
57	--	6	7
58	--	--	6

Note: Figure 8 shows the locations of the required barriers.

Source: Bollard Acoustical Consultants, Inc., 2020.

Thus, implementation of both mitigation measures would be sufficient to reduce the above potential impacts to a less-than-significant level.

Island Annexation Area and Fairway Oaks VTM Site

XIII-1. To the maximum extent practical, the following measures shall be incorporated into the project construction operations:

- *Project noise-generating construction activities shall occur within the hours identified in Galt Municipal Code Section 8.40.060.*
- *All noise-producing project equipment and vehicles using internal-combustion engines shall be equipped with manufacturers-recommended mufflers and be maintained in good working condition.*
- *All mobile or fixed noise-producing equipment used on the project site that are regulated for noise output by a federal, State, or local agency shall comply with such regulations while in the course of project activity.*

- *Electrically powered equipment shall be used instead of pneumatic or internal-combustion-powered equipment, where feasible.*
- *Material stockpiles and mobile equipment staging, parking, and maintenance areas shall be located as far as practicable from noise-sensitive receptors.*
- *Project area and site access road speed limits shall be established and enforced during the construction period.*
- *Nearby residences shall be notified of construction schedules so that arrangements can be made, if desired, to limit their exposure to short-term increases in ambient noise levels.*

The above criteria shall be included in the grading plan submitted by the applicant/developer for review and approval of the Public Works Department prior to issuance of grading permits. Exceptions to allow expanded construction activities shall be reviewed on a case-by-case basis as determined by the Chief Building Official and/or City Engineer.

Fairway Oaks VTM Site

XIII-2. *Prior to issuance of grading permits associated with the Fairway Oaks VTM, the final improvement plans shall include concrete masonry unit (CMU) walls at the locations shown in in Figure 8 of this IS/MND. Depending on the orientation of the residence on each lot along the open space area in the northeastern portion of the site, closest to SR 99, where a CMU wall is shown in Figure 8, an additional analysis may be necessary to confirm the need for a wall to shield noise to the backyard, subject to review and approval by the City of Galt Community Development Department. The height and location of the barriers shall be determined in coordination with the City of Galt Community Development Department, as necessary to meet the City's established exterior noise level thresholds.*

XIII-3. *Prior to issuance of grading permits associated with the Fairway Oaks VTM, the final improvement plans shall demonstrate that all north, south, and east-facing bedroom windows of residences constructed on the lots identified in Figure 8 of this IS/MND shall meet the minimum STC ratings identified in the figure, to the satisfaction of the City of Galt Community Development Department.*

XIII-4. *Mechanical ventilation (air conditioning) shall be provided for all guestrooms/residences within the development to allow the occupants to close doors and windows as desired for additional acoustical isolation. Such improvements shall be noted on all improvement plans, and submitted to the City of Galt Community Development Department for review.*

b. Similar to noise, vibration involves a source, a transmission path, and a receiver. However, noise is generally considered to be pressure waves transmitted through air, whereas vibration usually consists of the excitation of a structure or surface. Vibration is measured in terms of acceleration, velocity, or displacement. A common practice is to monitor vibration in terms of peak particle velocities (PPV) in inches per second (in/sec). Standards pertaining to perception as well as damage to structures have been developed for vibration levels defined in terms of PPV. Human and structural response to different vibration levels

is influenced by a number of factors, including ground type, distance between source and receptor, duration, and the number of perceived vibration events. The threshold for architectural damage to structures is 0.20 in/sec PPV. Continuous vibrations of 0.10 in/sec PPV, or greater, may cause annoyance to sensitive receptors.

The proposed project would not involve any uses or operations that would generate substantial groundborne vibration. However, project construction activities, such as the use of heavy equipment for grading, excavation, paving, and building construction, have the potential to result in varying degrees of temporary ground vibration in the project vicinity. As noted in question 'a', the nearest sensitive receptors are the residences located approximately 30 feet away from the proposed disturbance area.

Table 12 shows the typical vibration levels produced by construction equipment at various distances. As shown in the table, the maximum vibration levels generated from construction activities at the nearest sensitive receptors would be 0.068 in/sec PPV, which is below the Caltrans threshold for damage to residential structures (0.30 in/sec PPV) and for human annoyance (0.25 in/sec PPV).

Table 12
Vibration Levels for Various Construction Equipment

Type of Equipment	PPV at 25 feet (in/sec)	PPV at 30 feet (in/sec)
Hoe ram	0.089	0.068
Large bulldozer	0.089	0.068
Caisson drilling	0.089	0.068
Loaded trucks	0.076	0.058
Jackhammer	0.035	0.027
Small bulldozer	0.003	0.002

Source: FTA Transit Noise and Vibration Impact Assessment Manual, 2018.

Based on the above, the proposed project would not expose people to or generate excessive groundborne vibration or groundborne noise levels, and a ***less-than-significant*** impact would occur.

c. The nearest airport to the site is Lodi Airport, which is located approximately three miles southeast of the site. As such, the project site is not located within two miles of any public airports, and does not fall within an airport land use plan area. Therefore, ***no impact*** would occur related to the project being located within an airport land use plan or within two miles of a public airport or public use airport, thereby resulting in a safety hazard or excessive noise for people residing or working in the project area.

XIV. POPULATION AND HOUSING. *Would the project:*	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. 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)?	☐	☐	✖	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	✖	☐

Discussion

a. The proposed project would include annexation of the Island Annexation Area into the City of Galt, and development of the Fairway Oaks VTM Site with approximately 173 single-family residential units. The following sections discuss the impacts to population and housing that could result from annexation of the Island Annexation Area and development of the Fairway Oaks VTM Site.

Island Annexation Area

The Island Annexation Area would retain the current General Plan land use designations and development of the Island Annexation Area is not proposed at this time. However, should development occur within the Island Annexation Area in the future, the project applicant would be required to comply with relevant regulations and policies governing population and housing. Considering that the Island Annexation Area have been assigned land use designations in the City's General Plan, future development of the Island Annexation Area has been planned, and the proposed project would not induce substantial unplanned population growth beyond what has been anticipated by the City.

Fairway Oaks VTM Site

Development of the Fairway Oaks VTM Site would include the construction of 173 units. Using the City of Galt average persons per household value for single-family uses of 3.27, the proposed project would result in approximately 566 new residents.[28] The Department of Finance estimates the 2019 population of Galt, based on the 2010 Census, to be approximately 26,489.[29] It should be noted that population growth itself does not constitute an environmental impact; rather, increased demands on the physical environment resulting from increases in population are considered environmental impacts. Physical environmental effects associated with development of the proposed project area are evaluated throughout this IS/MND.

The project includes a rezone of the site from R1C and R1B to R1C-PD. However, the number of proposed dwelling units would be consistent with what is expected under the current General Plan land use designation. Furthermore, as discussed in Section XVIII, Utilities and Services Systems, adequate utility infrastructure and services exist to meet the additional demands that would be created by the project. Similarly, as discussed in Section XIV, Public Services, public service providers such as local police and fire departments would be capable of accommodating the demands of the proposed project.

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[28] City of Galt. *Community Profile: City of Galt Demographic Overview.* Available at: http://www.ci.galt.ca.us/city-departments/economic-development/community-profile. Accessed December 2019.

[29] California Department of Finance. *E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2019, with 2010 Benchmark.* Available at: http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/. Accessed December 2019.

It should be noted that LAFCo has requested that further analysis and discussion regarding the extent to which the proposed project would contribute to environmental justice issues. The City of Galt currently does not have an ordinance addressing environmental justice. Furthermore, the analysis of environmental justice issues is not required by CEQA. The CKH states in Government Code Section 56668(o) that "environmental justice" means the fair treatment of people of all races, cultures, and incomes with respect to the location of public facilities and the provision of public services. With approval of the proposed annexation into the City of Galt, all future public services would be provided to the Island Annexation Area by the City of Galt. Therefore, the proposed project would not result in environmental injustice issues with respect to the provision of public services. In addition, as discussed in the Public Services, Recreation, and Utilities and Services sections of this IS/MND, all impacts related to public services and utilities would be less-than-significant.

Considering the relative size of the proposed development, the availability of sufficient infrastructure, and the project's consistency with the General Plan, development of the Fairway Oaks VTM Site would not include substantial unplanned population growth.

Conclusion

Based on the above, development within the Island Annexation Area is not proposed at this time, but such development has been anticipated by the City's General Plan and General Plan EIR. Furthermore, development of the Fairway Oaks VTM Site for the uses proposed has been generally anticipated in the City's General Plan and analyzed in the General Plan EIR. Consequently, the proposed project would not induce substantial population growth in an area, either directly or indirectly, and a ***less-than-significant*** impact would occur.

b. **Island Annexation Area**

The Island Annexation Area is mostly vacant with some rural residences. The proposed project would not involve any changes to the existing uses. Thus, the proposed project would not result in the displacement of substantial numbers of people or the need to construct replacement housing due to annexation of the Island Annexation Area.

Fairway Oaks VTM Site

The Fairway Oaks VTM Site does not currently include any residences. The proposed project would develop the site with 173 new residential units. Consequently, the proposed project would not result in the displacement of substantial numbers of people or the need to construct replacement housing as a result of buildout of the Fairway Oaks VTM Site.

Conclusion

Based on the above, the proposed project would not displace any residences within the Island Annexation Area nor the Fairway Oaks VTM Site. Accordingly, implementation of the proposed project would not necessitate the construction of replacement housing elsewhere, and impacts would be considered ***less than significant***.

XV. PUBLIC SERVICES. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:*	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Fire protection?	☐	☐	✖	☐
b. Police protection?	☐	☐	✖	☐
c. Schools?	☐	☐	✖	☐
d. Parks?	☐	☐	✖	☐
e. Other Public Facilities?	☐	☐	✖	☐

Discussion

a. The Island Annexation Area and Fairway Oaks VTM Site would receive fire protection services from the Cosumnes Community Services District Fire Department (CCSDFD). The CCSDFD operates eight fire stations to serve the cities of Galt and Elk Grove, as well as areas of unincorporated Sacramento County, covering a total of approximately 157 square miles. The CCSDFD currently staffs 177 personnel which includes 175 full-time and two part-time employees. Two fire stations are located in the City of Galt: Fire Station 45 at 229 Fifth Street and Fire Station 46 at 1050 Walnut Avenue. The station closest to the project site is Fire Station 45, located approximately 0.6-mile northwest of the site.

The increase in the overall demand on fire protection services associated with buildout of the City of Galt has been previously anticipated by the City and analyzed in the General Plan EIR. The General Plan EIR found that buildout of the General Plan would increase the need for fire protection services and result in a significant and unavoidable impact. However, as identified in the City's Municipal Services Review, the CCSDFD has a Strategic Plan to help guide mid- and long-term planning efforts for facility siting and operation. Therefore, the Strategic Plan would ensure that the CCSDFD has adequate facilities and operations capacity to support the proposed project. In addition, the City of Galt collects a special tax (Public Safety Community Facilities District) for police, fire, and emergency medical services from new growth areas in the City. The revenue from the tax is collected for ongoing delivery of services, and not for capital facilities such as equipment. Capital Impact Fees would also be required to be paid for the Fairway Oaks VTM and any future development of the Island Annexation Area. Furthermore, the proposed project is consistent with the General Plan land use designations and, thus, the increase in overall demand for fire protection services resulting from the proposed project would not be more severe than what has been previously anticipated.

Furthermore, implementation of the proposed Fairways Oaks VTM and any potential future development in the Island Annexation Area would be required to comply with Chapter 15.28, the Fire Code, of the Municipal Code, which requires that projects install a fire sprinkler system and adhere to all fire protection codes established by the CCSDFD. Compliance with the Fire Code would reduce the risk of fire at the project site, and, thus, reduce potential demand for fire protection. In addition, the proposed project and any future development of the Island Annexation Area would be subject to all applicable development impact fees and public safety fees, payment of which would mitigate the costs of equipment and facilities maintenance, personnel training, salaries, etc. Thus,

payment of fees would ensure that adequate fire services would be available to serve the proposed project and future development of the Island Annexation Area, and the proposed project would not require the construction of new or physically altered fire protection facilities, the construction of which could cause an environmental impact.

Based on the above, the proposed project would not result in the need for new or physically altered fire protection facilities, the construction of which could cause an environmental impact, and a ***less-than-significant*** impact would occur.

b. Police service would be provided by the Galt Police Department, located at 455 Industrial Drive. The Galt 2030 General Plan EIR determined that the increased cost to maintain equipment and facilities and to train and equip personnel would be offset through the increased revenue, and fees, generated by increased development. The applicant for the Fairway Oaks VTM Project, and any future development within the Island Annexation Area, would be required to pay all applicable fees, including development impact fees and public safety fees. Given that the proposed project is consistent with the General Plan land use designations, increases in police protection services associated with the project have been analyzed in the City's General Plan EIR. Furthermore, the City of Galt General Plan includes the Public Facilities and Services Element to establish goals and policies for the City. The General Plan ensures that emergency response equipment and personnel training are adequate to follow the procedures contained within the City's Emergency Operations Plan. Therefore, the proposed project would not result in the need for new or physically altered police protection facilities, the construction of which could cause an environmental impact, and a ***less-than-significant*** impact would occur.

c. The project site falls within the boundaries of the Galt Joint Union Elementary School District, which operates the middle and elementary schools, and the Galt Joint Union High School District, which operates the high schools. The proposed project would not result in any development within the Island Annexation Area at this time. Future development of the Island Annexation Area would generate additional students, but the increase has already been anticipated and analyzed in the General Plan EIR. According to the student generation rates included in the 2011 *School Facility Needs Analysis*, development of the Fairway Oaks VTM Site with the proposed 173 single-family residences would add approximately 150 students to the Galt Joint Union Elementary and High School Districts.

According to the Galt 2030 General Plan Existing Conditions, Galt High School and GJUESD were exceeding capacity; however, funding for school facilities is provided through State and local revenue sources, and recent discussions with the GJUESD have indicated that the existing schools in the project area are not at capacity.[30]

Funding for new school construction is provided through State and local revenue sources. Senate Bill (SB) 50 (Chapter 407, Statutes of 1998) governs the amount of fees that can be levied against new development. Payment of fees authorized by the statute is deemed "full and complete mitigation." These fees would be used in combination with State and other funds to construct new schools. The applicant for development within the Fairway Oaks VTM Site, and any future applicants for development within the Island Annexation Area, would be required to pay development impact fees in order to fund new school facilities.

[30] GHD, Inc. *Simmerhorn Ranch Traffic Impact Study*. November 6, 2019.

Because the proposed project would be required to pay applicable school fees, the amount of which are pre-empted by the State, and because the increase in students that would be associated with the project was previously anticipated within the General Plan, the project would result in a ***less-than-significant*** impact.

d. **Island Annexation Area**

The proposed project would not result in any development within the Island Annexation Area at this time. Although future development within the Island Annexation Area would increase the demand for parks and recreation facilities from existing levels, such an increase in demand has already been anticipated by the City and analyzed in the General Plan EIR. Potential future development of the area would not increase the severity of impacts from what is already anticipated. Furthermore, any future development in the Island Annexation Area would be required to comply with the City's Municipal Code. Specifically, Section 18.64.080B of Galt's Municipal Code requires either the dedication of parkland or payment of an in-lieu fee to be used for community and neighborhood parks and facilities. As such, any future development within the Island Annexation Area would not be expected to result in a significant effect on park facilities.

Fairway Oaks VTM Site

The proposed project involves the development of 173 single-family residences, as well as a 11-acre open space zone, within the Fairway Oaks VTM Site. While the proposed project would increase demand for park services, the project's open space zone would be used as a park facility. As discussed in the Population and Housing section of this IS/MND, development of the Fairway Oaks VTM Site could result in approximately 566 new residents. The General Plan requires five acres of parkland per 1,000 residents; therefore, the project would be required to supply 2.8 acres of parkland. The Fairway Oaks VTM Project includes the provision of 11 acres of designated park area, which exceeds the amount required by the General Plan. Thus, the Fairway Oaks VTM would include adequate public parkland for future residents.

Conclusion

Based on the above, the proposed project would result in a ***less-than-significant*** impact to park facilities.

e. The Galt 2030 General Plan anticipates increased demand for public facilities with growth in the City of Galt. Both the Island Annexation Area and the Fairway Oaks VTM Site are designated for development. Development of the Island Annexation Area is not proposed at this time; however, upon annexation into the City, the City would be responsible for providing public and governmental facilities to the existing residents within the Island Annexation Area. Furthermore, implementation of the Fairway Oaks VTM Project would result in an increase in demand for public and governmental facilities through the development of new residences. Considering the provision of an on-site park as well as a school, and the existence of public and governmental facilities within the City, the proposed project would not be anticipated to result in the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service for any other public services.

In addition, LAFCo has requested that further analysis and discussion regarding the extent to which the proposed project would contribute to environmental justice, shall be provided. The CKH states in Government Code Section 56668(o) that "environmental justice" means

the fair treatment of people of all races, cultures, and incomes with respect to the location of public facilities and the provision of public services. With approval of the proposed project and annexation into the City of Galt, all public services would be provided to the project site by the City of Galt. Therefore, the proposed project would not result in environmental injustice with respect to the provision of public services. Therefore, a ***less-than-significant*** impact would occur.

XVI. RECREATION. *Would the project:*	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Would the project increase 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?	☐	☐	✖	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	✖	☐

Discussion

a,b. **Island Annexation Area**

As previously discussed, development within the Island Annexation Area is not proposed at this time. While future development within the Island Annexation Area would result in population growth, thereby increasing demand for parks and other recreational facilities, such demand has been anticipated in the City's General Plan, and potential physical effects on the environment resulting from the provision of parks and recreation facilities sufficient to serve any potential future development has been analyzed in the City's General Plan EIR. Moreover, should any new development occur within the Island Annexation Area, development would be required to comply with the General Plan requirement of five acres of parkland per 1,000 residents or pay the City's in-lieu fees, pursuant to Municipal Code Section 18.64.080B.

Fairway Oaks VTM Site

Development of the Fairway Oaks VTM Site would include construction of 173 single-family residences, which are expected to house approximately 566 persons. Thus, an increase in demand on recreational facilities would occur. As described previously, the proposed project includes 11 acres of parkland, which is greater than the amount required by the General Plan. The parkland also functions as a conservation easement, which would require minimal maintenance. Furthermore, development of the Fairway Oaks VTM Site was previously analyzed within the General Plan EIR. The proposed project is consistent with the site's current General Plan land use designation, and implementation of the proposed project would not result in any impacts more severe than what was previously anticipated in the General Plan EIR. Therefore, the proposed project would result in a ***less-than-significant*** impact.

Conclusion

The proposed project would not result in increased use of existing recreational facilities, or construction of new recreation facilities, beyond what has been previously anticipated in the City's General Plan EIR. Therefore, a ***less-than-significant*** impact would occur related to recreation.

XVII. TRANSPORTATION. *Would the project:*	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	✖	☐
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	✖	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	✖	☐
d. Result in inadequate emergency access?	☐	☐	✖	☐

Discussion

The Island Annexation Area would retain the current General Plan land use designations and further development of the Island Annexation Area is not proposed at this time. Any potential future development within the Island Annexation Area would occur in compliance with the existing General Plan land use designations for the Island Annexation Area; thus, potential impacts related to transportation and circulation associated with such future development have been anticipated by the City and analyzed in the General Plan EIR. Considering the lack of current development proposals for the Island Annexation Area, as well as the existing City regulations and standards related to transportation facilities, the proposed project would not be anticipated to result in impacts related to transportation due to annexation of the Island Annexation Area. Therefore, the following discussion focuses only on transportation impacts resulting from buildout of the Fairway Oaks VTM Site.

a. The following discussion is based on a Transportation Impact Analysis (TIA) prepared for the proposed project by GHD, Inc. (see Appendix E).[31] It should be noted that the TIA analysis was performed for an earlier submittal of the project that included 169 units rather than the currently proposed 173 units. However, the increase of four units would not modify the conclusions of the TIA presented below.

Study Intersections, Freeway Ramps, and Weaving Segments

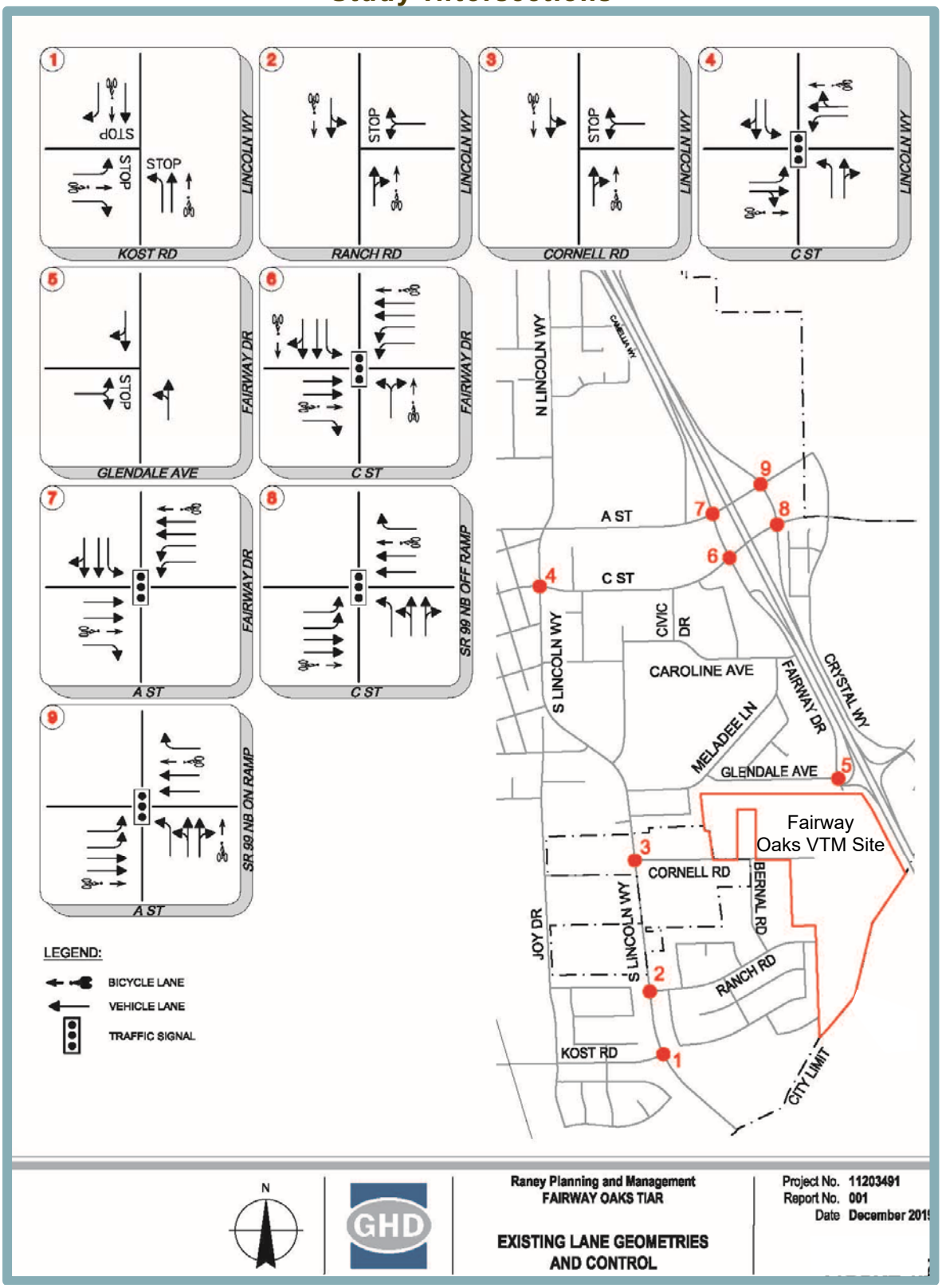
The following nine study intersections were selected for analysis in the TIA:

1. Lincoln Way / Kost Road
2. Lincoln Way / Ranch Road
3. Lincoln Way / Cornell Road
4. Lincoln Way / C Street
5. Glendale Avenue / SR 99 Southbound Ramps
6. Fairway Drive / C Street
7. A Street / SR 99 Southbound Off-ramp
8. C Street / SR 99 Northbound Off-ramp
9. A Street / SR 99 Northbound On-ramp

The location of each study intersection is shown in Figure 9.

[31] GHD. *Fairway Oaks Traffic Impact Study*. January 28, 2020.

Figure 9
Study Intersections



In addition, the following five freeway ramp and weaving segment locations were studied:

1. SR 99 Northbound Crystal Way to C Street Weaving Segment
2. SR 99 Northbound A Street to Simmerhorn Weaving Segment
3. SR 99 Southbound Elm Avenue to A Street Weaving Segment
4. SR 99 Southbound C Street to Fairway Drive Weaving Segment
5. SR 99 Southbound Fairway Drive/Glendale Avenue On-Ramp Merging Segment

Study Scenarios

The assessment of potential traffic impacts is based on a comparison of AM and PM peak hour traffic conditions under the following scenarios:

- **Existing Conditions** – This scenario analyzes the existing traffic operations at the study locations using recent (February 2018, May 2019, and October 2019) peak hour traffic counts and intersection configurations.
- **Existing Plus Project Conditions** – This scenario is identical to Existing Conditions, but with the addition of traffic from the proposed project.
- **Cumulative Conditions** – This scenario considers the projected local growth up through the year 2040, without the proposed project.
- **Cumulative Plus Project Conditions** – This scenario is identical to Cumulative Conditions, but with the addition of traffic from the proposed project.

Methodology and Significance Criteria

Analysis of traffic operations was conducted using methods documented in the Transportation Research Board Publication *Highway Capacity Manual, Sixth Edition, A Guide for Multimodal Mobility* Analysis (HCM 6). The Synchro 10 software program was used to implement the HCM 6 methodology, and was used to calculated delays and corresponding Level of Service (LOS). LOS is a qualitative measure that describes the operational conditions of vehicle traffic and the perceptions of motorists and passengers. Operational LOS is given letter designations from A to F, with A representing the best operating conditions (free flow of traffic) and F representing the worst operating conditions (severely congested flow with high delays). Traffic counts at the study intersections were conducted in February 2018, May 2019, and October 2019, and the ramp and weaving segment values are based on average annual peak hour volumes for 2018.

The Galt 2030 General Plan Circulation Element specifies minimum LOS standards for all streets and intersections within the City of Galt's jurisdiction in Policy C-1.3, Level of Services. Policy C-1.3 states the following regarding Citywide LOS:

> The City should develop and manage its roadway system to maintain LOS "E" on all streets and intersections within a quarter-mile of State Routes, along A Street and C Street between State Route 99 to the railroad tracks, and along Lincoln Way between Pringle Avenue to Meladee Lane. The City should develop a LOS "D" or better on all other streets and intersections.

The Caltrans' Guide for the Preparation of Traffic Impact Studies states the following policy regarding LOS on State highways:

> Caltrans endeavors to maintain a target LOS at the transition between LOS "C" and LOS "D" on State highway facilities, however, Caltrans acknowledges that this

may not always be feasible and recommends that the lead agency consult with Caltrans to determine the appropriate target LOS.

For the study intersections, the proposed project would result in a significant impact if the addition of project traffic would cause an intersection operating at an acceptable LOS to degrade to an unacceptable LOS, or increase the average delay by more than five seconds at an intersection that operates unacceptably without the project.

For freeway ramps, the proposed project would result in a significant impact if the addition of project traffic would:

- Result in a facility operating at an acceptable LOS to deteriorate to an unacceptable LOS, as defined by Caltrans;
- Increase the density by more than five percent at a ramp segment that is already operating or will operate at LOS E under No Project conditions; or
- Increase the overall volume/capacity (v/c) by 0.05 at a ramp segment that will operate at LOS F under Plus Project conditions.

Project Trip Generation and Distribution

Trip generation for the proposed project was estimated using published trip generation rates from the Institute of Transportation Engineers (ITE) publication *Trip Generation*, 9th Edition. As shown in Table 13, implementation of the proposed project would result in an estimated 1,685 average daily vehicle trips (ADT), with 125 trips occurring during the AM peak hour and 167 trips occurring during the PM peak hour.

Table 13
Project Vehicle Trip Generation Summary

Land Use	Trip Rate	ADT	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Single-Family Detached: 169 units	9.97	1,685	31	94	125	105	62	167

Source: GHD, Inc., 2020.

The trip distributions from project-generated trips are estimated as follows: 12 percent of trip would go to and from downtown Galt, 27 percent of trips would go to and from the south, 20 percent of trips would go to and from the north along SR 99, 12 percent of trips would go to and from the northeast area of Galt from Boessow Road, 15 percent of trips would go to and from Lincoln Way and northwest areas, and the remaining 14 percent would go to and from western Galt or nearby areas.

Existing Plus Project Intersection LOS Analysis

The intersection LOS analysis is based on the traffic counts conducted during typical weekday AM and PM peak periods (7:00 to 9:00 AM and 4:00 to 6:00 PM, respectively) at the study intersections, with added vehicle trips from the proposed project based on the trip generation and distribution assumptions discussed above. The peak hour LOS at each study intersection under Existing and Existing Plus Project conditions is summarized in Table 14.

As shown in the table, all study intersections would continue to operate acceptably under Existing Plus Project Conditions, and the project's impact would be less than significant.

Table 14
Existing Plus Project Conditions: Intersection LOS

ID	Study Intersection	Control	Peak Hour	Existing		Existing Plus Project		
				Delay	LOS	Delay	LOS	Change in Delay
1	Lincoln Way/Kost Road	AWSC	AM	9.9	A	10.1	B	0.2
			PM	10.1	B	10.3	B	0.2
2	Lincoln Way/Ranch Road	TWSC	AM	11.4	B	11.8	B	0.4
			PM	11.2	B	11.7	B	0.5
3	Lincoln Way/Cornell Road	TWSC	AM	10.0	A	10.5	B	0.5
			PM	10.2	B	10.5	B	0.3
4	Lincoln Way/C Street	Signal	AM	16.5	B	16.8	B	0.3
			PM	17.8	B	17.9	B	0.1
5	Glendale Avenue/SR 99 Southbound Ramps	TWSC	AM	8.9	A	9.6	A	0.7
			PM	9.0	A	9.9	A	0.9
6	Fairway Drive/C Street	Signal	AM	15.1	B	15.9	B	0.8
			PM	15.4	B	16.1	B	0.7
7	A Street/SR 99 Southbound Off-ramp	Signal	AM	7.6	A	7.6	A	0.0
			PM	7.3	A	7.9	A	0.6
8	C Street/SR 99 Northbound Off-ramp	Signal	AM	13.1	B	13.1	B	0.0
			PM	12.4	B	12.8	B	0.4
9	A Street/SR 99 Northbound On-ramp	Signal	AM	10.7	B	10.8	B	0.1
			PM	9.4	A	9.4	A	0.0
10	Glendale Ave/Lillian Lane	TWSC	AM	-	-	8.9	A	-
			PM	-	-	8.9	A	-

Notes:
- AWCS = All Way Stop Control.
- TWSC = Two Way Stop Control.
- Delay is expressed in average seconds per vehicle.

Source: GHD, Inc., 2020

Existing Plus Project Ramp Segment LOS Analysis

The ramp LOS analysis is based on weekday AM and PM peak hour ramp segment operations quantified using existing traffic volumes from ramp-adjacent intersections as well as the Caltrans Performance Measurement System (PeMS) and Caltrans data. The peak hour LOS and density, presented in terms of passengers per mile per lane (pc/mi/ln) at each segment under Existing and Existing Plus Project conditions is summarized in Table 15.

As presented in the table, all ramp and weaving segments continue to operate at acceptable LOS under Existing Plus Project Conditions, and the project's impact would be less than significant.

Table 15
Existing Plus Project Conditions: Ramp Segment LOS

ID	Study Intersection	Segment Type	No. of Lanes	Target LOS	Peak Hour	Existing			Existing Plus Project			
						Density	LOS	Ramp Volume	Density	LOS	Ramp Volume	Change in Density
1	SR 99 NB Crystal Way to C Street	Weave	1	D	AM	15.6	B	1/307	15.6	B	1/311	0.0
					PM	21.5	C	10/376	21.7	C	10/389	0.2
2	SR 99 NB A Street to Simmerhorn Road	Weave	1	D	AM	18.2	B	525/197	18.5	B	544/197	0.3
					PM	23.0	C	483/293	23.2	C	495/293	0.2
3	SR 99 SB Elm Avenue to A Street	Weave	1	D	AM	17.3	B	280/340	17.3	B	280/342	0.0
					PM	22.5	C	185/459	22.8	C	185/464	0.3
4	SR 99 SB C Street to Fairway Drive	Weave	1	D	AM	16.8	B	323/59	16.9	B	323/64	0.1
					PM	20.3	C	267/56	20.4	C	267/72	0.1
5	SR 99 SB Fairway Drive/Glendale Avenue On-ramp	Merge	1	D	AM	26.8	C	53	27.0	C	72	0.2
					PM	31.6	D	74	31.7	D	87	0.1

Notes:
- Density is expressed in pc/mi/ln.
- Ramp volumes based on traffic counts collected August 29, 2019.
- For weaving sections, volumes listed are for On-Ramp/Off-Ramp.
- For merging and diverging ramps, volumes listed are ramp volumes.

Source: GHD, Inc., 2020

Cumulative Plus Project Intersection LOS Analysis

The Cumulative Conditions scenario assumes cumulative traffic volumes for the year 2040 based on planned and approved projects. The 20-year forecasts were based on the Citywide Travel Demand Model. The peak hour LOS at each study intersection under Cumulative and Cumulative Plus Project Conditions is summarized in Table 16.

Table 16
Cumulative Plus Project Conditions: Intersection LOS

ID	Study Intersection	Control	Peak Hour	No Project		Cumulative Plus Project		
				Delay	LOS	Delay	LOS	Change in Delay
1	Lincoln Way/Kost Road	AWSC	AM	13.4	B	13.7	B	0.3
			PM	12.3	B	12.6	B	0.3
2	Lincoln Way/Ranch Road	TWSC	AM	14.0	B	14.8	B	0.8
			PM	13.6	B	14.4	B	0.8
3	Lincoln Way/Cornell Road	TWSC	AM	11.1	B	11.9	B	0.8
			PM	11.1	B	11.5	B	0.4
4	Lincoln Way/C Street	Signal	AM	24.4	C	25.2	C	0.8
			PM	29.8	C	30.7	C	0.9
5	Glendale Avenue/SR 99 Southbound Ramps	TWSC	AM	9.4	A	10.1	B	0.7
			PM	9.5	A	10.3	B	0.8
6	Fairway Drive/C Street	Signal	AM	26.6	C	30.2	C	3.6
			PM	29.5	C	32.7	C	3.2
7	A Street/SR 99 Southbound Off-ramp	Signal	AM	10.9	B	10.9	B	0.0
			PM	11.3	B	11.3	B	0.0
8	C Street/SR 99 Northbound Off-ramp	Signal	AM	46.8	D	47.2	D	0.4
			PM	25.8	C	27.5	C	1.7
9	A Street/SR 99 Northbound On-ramp	Signal	AM	14.2	B	14.3	B	0.1
			PM	12.4	B	12.5	B	0.1
10	Glendale Avenue/Lillian Lane	TWSC	AM	-	-	9.1	A	-
			PM	-	-	9.0	A	-

Notes:
- AWCS = All Way Stop Control, TWSC = Two Way Stop Control.
- Delay is expressed in average seconds per vehicle.

Source: GHD, Inc., 2020.

As shown in Table 16, all study intersections operate at an acceptable LOS under Cumulative Plus Project Conditions, and the project's impact would be less than significant.

Cumulative Plus Project Ramp Segment LOS Analysis

The peak hour LOS and density (pc/mi/ln) at each ramp segment under Cumulative No Project and Cumulative Plus Project conditions is summarized in Table 17.

Table 17
Cumulative Plus Project Conditions: Ramp Segment LOS

ID	Study Intersection	Segment Type	No. of Lanes	Target LOS	Peak Hour	No Project			Cumulative Plus Project			
						Density	LOS	Ramp Volume	Density	LOS	Ramp Volume	Change in Density
1	SR 99 NB Crystal Way to C Street	Weave	1	D	AM	23.1	C	105/725	23.2	C	105/729	0.1
					PM	33.0	D	15/795	33.2	D	15/808	0.2
2	SR 99 NB A Street to Simmerhorn Road	Weave	1	D	AM	21.6	C	535/220	21.8	C	554/220	0.2
					PM	30.3	D	510/297	30.4	D	522/297	0.1
3	SR 99 SB Elm Avenue to A Street	Weave	1	D	AM	22.8	C	302/430	22.9	C	302/432	0.1
					PM	28.9	D	314/510	29.1	D	314/515	0.2
4	SR 99 SB C Street to Fairway Drive	Weave	1	D	AM	25.6	C	720/75	25.7	C	720/80	0.1
					PM	30.3	D	640/75	30.5	D	640/91	0.2
5	SR 99 SB Fairway Drive/Glendale Avenue On-ramp	Merge	1	D	AM	36.3	E	75	36.5	E	94	0.2
					PM	**v/c = 1.02**	**F**	**90**	**v/c = 1.03**	**F**	**103**	**0.01**

Notes:

- *Density is expressed in pc/mi/ln.*
- Ramp volumes based on traffic counts collected August 29, 2019.
- For weaving sections, volumes listed are for On-Ramp/Off-Ramp.
- For merging and diverging ramps, volumes listed are ramp volumes.
- ***Bold** = unacceptable conditions.*

Source: GHD, Inc., 2020.

As presented in the table, the following ramp segment would operate unacceptably (LOS F) during the PM peak hour under Cumulative Conditions, and are also projected to operate unacceptably with the addition of project traffic under Cumulative Plus Project conditions:

- #5 – SR 99 Southbound Fairway Drive/Glendale Avenue On-ramp (AM peak hour, LOS E; PM peak hour, LOS F).

All other freeway ramp and weaving segments would operate acceptably under Cumulative Plus Project conditions.

Given that the SR 99 Southbound Fairway Drive/Glendale Avenue On-ramp segment operates unacceptably without the proposed project under Cumulative Conditions, the relevant impact threshold is whether the project's traffic would increase the density at the segment by more than five percent for the AM peak hour or increase the overall v/c by more than 0.05 for the PM peak hour. During the AM peak hour, the addition of project traffic would increase density from 36.3 to 36.5 pc/mi/ln at the segment, (0.6 percent), which is below the five percent threshold of significance. During the PM peak hour, the v/c is projected to increase by 0.01 with the addition of project traffic, which is under the 0.05 threshold. As such, the project's impact would be less than significant.

Pedestrian, Bicycle, and Transit Facilities

The following provides a discussion of the proposed project's potential impacts to pedestrian, bicycle, and transit facilities.

Pedestrian Impacts

In the project vicinity, Chabolla Ave/Lincoln Way, Meladee Lane/Lincoln Way, and Southdale Court/Lincoln Way have stop signs, and each intersection has marked crosswalks. In addition, sidewalks exist along the residential streets surrounding the project site, along Ranch Road, Tradepost Trail, Glendale Avenue, and more. As part of the proposed project, new sidewalk facilities would be provided throughout the development area and would connect to existing sidewalk facilities on Glendale Avenue, Ranch Road, and Chase Drive. The proposed sidewalks would be consistent with General Plan Policy C-6.1, which requires that the City establishes safe and interconnected pedestrian networks. Thus, adequate pedestrian facilities would be available for the proposed project, and the project would not conflict with any existing or planned pedestrian facilities in the project vicinity. A less-than-significant impact related to pedestrian facilities would occur.

Bicycle Impacts

Bicycle facilities include the following:

- Bike Paths (Class I) – Paved trails that are separated from roadways;
- Bike Lanes (Class II) – Lanes on roadways designated for use by bicycles through striping, pavement legends, and signs; and
- Bike Routes (Class III) – Designated roadways for bicycle use by signs or other markings may or may not include additional pavement width for cyclists.

Class II bike lanes exist in the project vicinity along Lincoln Way. While most of the residential roadways surrounding the Fairway Oaks VTM Site do not include designated

bicycle lanes, the streets are of sufficient width and have slow speed limits, making the roadways relatively bikeable.

The proposed project includes construction of a paved 10-foot-wide Class I Trail from Chase Drive in the southern portion of the site, within the open space area along Dry Creek along the eastern border of the site, and west to connect to Lillian Lane. The trail would connect to the existing paved multi-use path that ends at the current terminus of Chase Drive, and would provide connection to a future trail across SR 99, per the City of Galt Bicycle Transportation Plan. The extended pathway would provide increased bicycle access to the project site, consistent with General Plan Policy C-6.3. Policy C-6.3 requires that the City encourage a continuous system of bicycle routes that link neighborhoods, activity centers, and recreational trails. Thus, adequate bicycle facilities would be available to serve the proposed project; and the project would not conflict with any existing or planned bicycle facilities in the project vicinity. A less-than-significant impact related to bicycle facilities would occur.

Public Transit Impacts

Transit services are available in Galt through South County Transit, which includes the following systems: Dial-a-Ride, Highway 99 Express, Delta Route, and Commuter Express. Dial-A-Ride provides service within the City limits of Galt, and the Highway 99 Express provides service connecting Galt with the Lodi Transit Center, Elk Grove, and South Sacramento. Delta Route provides service from Isleton and other Delta communities to Galt, and the Commuter Express provides direct service from Galt to midtown and downtown Sacramento.[32] The South County Transit systems service a bus station at City Hall, which is located approximately 0.4-mile north of the Fairway Oaks VTM Site. Given that the Fairway Oaks VTM Site is located in close proximity to public transportation and implementation of the proposed project would not conflict with any transit systems, a less-than-significant impact would occur.

Conclusion

Based on the above, the proposed project would not conflict with Caltrans' or the City's applicable LOS criteria for the study intersections and freeway facilities evaluated in the TIA. The proposed project includes access to multimodal transportation, and the project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Thus, a ***less-than-significant*** impact would occur.

b. Section 15064.3 of the CEQA Guidelines provides specific considerations for evaluating a project's transportation impacts. Per Section 15064.3, analysis of vehicle miles traveled (VMT) attributable to a project is the most appropriate measure of transportation impacts. While a qualitative discussion of VMT has been provided below, the provisions of Section 15064.3 apply only prospectively; determination of impacts based on VTM is not required Statewide until July 1, 2020.

Per Section 15064.3(3), a lead agency may analyze a project's VMT qualitatively based on the availability of transit, proximity to destinations, etc. While changes to driving conditions that increase intersection delay are an important consideration for traffic operations and management, the method of analysis does not fully describe

[32] South County Transit. *Welcome to South County Transit – SCT Link*. Available at: http://www.sctlink.com/. Accessed February 2020.

environmental effects associated with fuel consumption, emissions, and public health. Section 15064.3(3) changes the focus of transportation impact analysis in CEQA from measuring impact to drivers to measuring the impact of driving.

A VMT analysis was performed as part of the Traffic Impact Study prepared for the proposed project. As part of the VTM analysis, CalEEMod was used to estimate VMT generated from the proposed residences. As shown in Table 18 below, the project would result in a total of 2,759,156 average yearly VMT, or approximately 14.57 VMT per capita (i.e., per resident). Per the Traffic Impact Study, the project VMT per capita of 14.57 miles is 19 percent lower than the 2016 Sacramento Area regional average.

Table 18
Operational VMT: Development of Fairway Oaks VTM Site

Land Use	Quantity	Trip Generation		Vehicle Miles Traveled		
	Existing	Trips / Day / Unit	Daily	Annual	Daily	Per Capita
Single Family Housing	169 dwelling units	9.79	1,685	2,759,156	7,559	14.57

Source: GHD, Inc., 2020.

In addition, development of the Fairway Oaks VTM Site would increase connectivity to the nearby neighborhoods and include pedestrian and bicycle infrastructure within the project site and along Cornell Road. A Class I trail would run through the open space area, and connect to the existing trail system. The inclusion of such features would encourage residents to use alternative transportation and, as a result, reduce VMT associated with the proposed project.

Furthermore, increased connectivity to the nearby neighborhoods would allow future residents access to the existing transit facilities available within the City of Galt. As noted in question 'a' above, the project site would be served by the South County Transit system with Routes that stop approximately 0.4-mile north of the site. Access to multiple forms of public transportation would ultimately encourage residents to use alternative means of transportation to and from the project site.

Based on the above, the proposed project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b), and a ***less-than-significant*** impact would occur.

c,d. Sufficient emergency access is determined by factors such as the number of access points, the width of access roadways, and the width of internal roadways. The proposed Fairway Oaks VTM would provide four entrance points, from Chase Drive, Lillian Lane, Cornell Road, and Ranch Road, each with widths able to accommodate emergency vehicles. Based on site plans, the internal roadways would range from 44 to 50 feet wide, which would be sufficient to accommodate emergency vehicles circulating the project site.

Construction traffic associated with development at the Fairway Oaks VTM Site and potential future development within the Island Annexation Area would include heavy-duty vehicles, which would share the area roadways with normal vehicle traffic, as well as transport of construction materials, and daily construction employee trips to and from the site. However, such heavy-duty truck traffic would only occur throughout the duration of construction activities and would cease upon buildout. Given that increased construction

traffic would be temporary in nature, construction traffic on local roadways would not result in significant hazards to the circulation system or restrict emergency vehicle access to the project site.

In addition, the proposed project would not involve changes to the circulation system that include any tight curves or other design hazards. As such, the proposed project would not introduce hazardous geometric design features or incompatible uses.

Finally, the TIA included an evaluation of traffic collisions at the unsignalized study intersections. Between 2014 and 2018, only one of the unsignalized intersections, Fairway Drive/Glendale Avenue, had a reported collision. As such, none of the unsignalized study intersections meet the collision criteria to warrant implementation of a traffic signal, and dangerous unsignalized intersections were not identified.

Based on the above, the project would not substantially increase hazards due to a design feature or incompatible uses, or result in inadequate emergency access, and a ***less-than-significant*** impact would occur.

XVIII. TRIBAL CULTURAL RESOURCES. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:*	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k).	☐	✖	☐	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	✖	☐	☐

Discussion

a,b. **Island Annexation Area**

Considering that development within the Island Annexation Area is not proposed at this time, the proposed project would not have the potential to result in adverse effects to any tribal cultural resources within the Island Annexation Area. Future development within the Island Annexation Area has been analyzed in the City's General Plan EIR, and potential impacts related to development of the Island Annexation Area following implementation of the proposed project would be similar to what was anticipated within the City's General Plan EIR. Future development within the Island Annexation Area could result in impacts to previously unknown tribal cultural resources should any be encountered during ground-disturbing activities.

Fairway Oaks VTM Site

As discussed in Section V, Cultural Resources, of this IS/MND, the Fairway Oaks VTM Site was determined to have a low to moderate sensitivity for identifying prehistoric archaeological sites, and moderate sensitivity for finding historic-period cultural resources. The Fairway Oaks VTM Site does not contain any existing permanent structures or any known resources listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), and does not contain known resources that could be considered historic pursuant to the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.

In compliance with AB 52, a project notification letter was distributed to the chairpersons of the Wilton Rancheria and the Torres Martinez Desert Cahuilla Indian Tribe on August 29, 2019. The contacted tribes have not requested formal consultation with the City of Galt.

Nonetheless, the potential exists for previously unknown tribal cultural resources to be encountered during ground-disturbing activities associated with development of the Fairway Oaks VTM Site, and for impacts to such resources to occur.

Conclusion

Based on the above, although known tribal cultural resources do not occur within the project site, the possibility exists that construction associated with development of the Fairway Oaks VTM Site and future development of the Island Annexation Area could result in a substantial adverse change in the significance of a tribal cultural resource, if previously unknown cultural resources are uncovered during grading or other ground-disturbing activities. Thus, a ***potentially significant*** impact to tribal cultural resources could occur.

Mitigation Measure(s)

Implementation of the following mitigation measure would reduce the above potential impact to a *less-than-significant* level.

Island Annexation Area and Fairway Oaks VTM Site

XVIII-1. Implement Mitigation Measures V-1 and V-2.

XIX. UTILITIES AND SERVICE SYSTEMS. *Would the project:*	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. 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?	☐	☐	✖	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	✖	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	✖	☐
d. 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?	☐	☐	✖	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	✖	☐

Discussion

The Island Annexation Area would retain the current General Plan land use designation and further development of the Island Annexation Area is not proposed at this time. Accordingly, construction activities would not occur within the Island Annexation Area with implementation the proposed project. Should development occur within the Island Annexation Area in the future, all such development would be subject to the relevant regulations within the City's General Plan and Municipal Code, as well as other regulations related to utilities and service systems, as discussed for the Fairway Oaks VTM below.

Furthermore, future buildout of the Island Annexation Area per the area's current General Plan land use designation has been anticipated by the City, and impacts to utilities and service systems have been analyzed in the General Plan EIR. As noted within the General Plan EIR, with the implementation of the mitigation measures included therein, adequate capacity exists for local infrastructure and planned infrastructure improvements to provide water supply, stormwater drainage, electricity, natural gas, and telecommunication facilities to serve future developments within the Island Annexation Area. The General Plan EIR concluded that impacts related to wastewater treatment and solid waste management would be significant and unavoidable impacts. However, pursuant to Section 21083.3 of the CEQA Guidelines, if a development project is consistent with the local general plan and zoning, the environmental analysis should be limited to effects on the environment which are peculiar to the parcel or to the project. Future development within the Island Annexation Area is not anticipated to be peculiar relative to what was analyzed in the General Plan EIR and, therefore, further analysis related to wastewater and solid waste is not required.

Considering the lack of current development proposals for the Island Annexation Area, the existing regulations related to utilities, and the previously analysis within the General Plan EIR,

the proposed project would not be anticipated to result in impacts related to utilities and service systems due to annexation of the Island Annexation Area. Therefore, the following discussion focuses only on utilities and service systems impacts resulting from buildout of the Fairway Oaks VTM Site.

a,c. Sewer, water, and stormwater service for the proposed Fairway Oaks VTM would be provided by the City of Galt Public Works Department. The project would include construction of new eight-inch water lines within each internal street, which would connect to existing 12-inch water line within Glendale Avenue and along the Fairway Oaks VTM Site perimeter. New eight- to 12-inch sanitary sewer lines would be constructed, and would connect to an existing 10-inch sewer main within Ranch Road. The proposed project would also include a new sewer main in Cornell Road and Bernal Road (in Cornell Drive from the project site to Bernal Road), connecting to the existing line on the east side of Bernal Road to the south. Stormwater draining off impervious surfaces such as roofs, parking areas, and drive aisles within the Fairway Oaks VTM Site would be captured by curb inlets and routed, by way of new underground drain pipes, to an existing network of storm drains.

Electrical utilities would be provided by SMUD, while natural gas utilities would be provided by PG&E by way of connections to existing infrastructure located within the immediate project vicinity. The utility infrastructure for the proposed Fairway Oaks VTM would be designed with adequate capacity to accommodate demand from development of the Fairway Oaks VTM Site, as well as other existing and planned uses in the project area.

The City of Galt's current wastewater treatment collection system includes approximately 79 miles of sewer mains and trunk sewers. The wastewater is collected through the sewer mains and trunk sewers, then conveyed to the City of Galt's wastewater treatment plant (WWTP), which is located at 10059 Twin Cities Road. The WWTP has a capacity of 3.0 million gallons per day (mgd) and is currently operating at 2.0 mgd.[33] Thus, the WWTP has a remaining capacity of approximately 1.0 mgd. Given the nature and size of the proposed project, development of the Fairway Oaks VTM Site with 173 residential units would result in a negligible fraction of wastewater generation compared to the remaining capacity. Furthermore, given that the proposed project is consistent with the General Plan land use designations, utility demands associated with buildout of the project have been anticipated by the City's General Plan and wastewater related analyses, such as the City's Sanitary Sewer Management Plan and Wastewater Treatment Plant Facilities Master Plan. The project would not result in increased utilities demands relative to what has been analyzed in the General Plan EIR.

As stated above, wastewater generated by the proposed Fairway Oaks VTM would be collected by new and existing wastewater infrastructure. Given the remaining capacity of the WWTP and utility improvements, the proposed project would not result in excess generation of wastewater or result in an adverse impact from utility installation. Therefore, the project would result in a ***less-than-significant*** impact related to the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

[33] City of Galt. *Wastewater Treatment Plant.* Available at: http://www.ci.galt.ca.us/city-departments/public-works/utilities-division/wastewater-services/wastewater-treatment-plant. Accessed January 2020.

b. Water supplies for the project site are supplied by the City of Galt. Per the City's 2015 UWMP, the City of Galt relies upon groundwater from the Cosumnes Subbasin of the San Joaquin Valley Groundwater basin as the sole source of domestic potable water for current and future water demand.[34] The Cosumnes Subbasin is managed through the South Basin Groundwater Management plan, which was adopted in 2011.

The City has eight active wells to extract groundwater from the Cosumnes Subbasin. The wells have capacities ranging from 600 to 1,900 gallons per minute (gpm) with a total capacity of approximately 10,400 gpm. The depth to groundwater is approximately 80 feet to 100 feet with the wells drawing water at depths ranging from 652 feet to 1,539 feet. As discussed in the General Plan EIR, the City has the capacity to supply all of the water demands with groundwater from the Cosumnes Subbasin through the year 2040, which includes buildout of the General Plan.

Furthermore, the City is projected to have sufficient water supplies to meet projected water needs through 2040 during normal, dry, and multiple dry years. The UWMP notes that water usage could be reduced by over 30 percent should conservation measures be necessary. The projected supply available to the City of Galt assumes that new wells will be developed in the future if warranted by demand, and would be adequate to serve a projected year 2040 population of 40,061.[35] Given that the proposed project is consistent with the General Plan land use designations, water demands associated with buildout of the project have been accounted for in applicable citywide planning documents, such as the UWMP, and have been analyzed in the General Plan EIR.

Considering the above, the City would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years, and a ***less-than-significant*** impact would occur.

d,e. Solid waste, recyclable materials, and compostable material collection within the City of Galt is operated by California Waste Recovery Systems (CWRS). CWRS is a private franchise that can haul solid waste to any approved landfill facility in the area. The Sacramento County Landfill located on Kiefer Boulevard has been recently expanded. The Sacramento County Landfill covers 1,084 acres of land; 660 acres are permitted for disposal. The sites permit allows the landfill to receive a maximum of 10,815 tons of waste per day. According to the California Department of Resources Recycling and Recovery (CalRecycle), the Sacramento County Landfill has a remaining capacity of 112,900,000 cubic yards out of a total permitted capacity of 117,400,000, or 96 percent remaining capacity.[36] Because of the Sacramento County Landfill's remaining capacity, construction and operation of the proposed project and future development of the Island Annexation Area, would not result in increased solid waste generation in excess of the Sacramento County Landfill's capacity.

The General Plan EIR concluded that, with implementation of applicable policies and actions, buildout of the General Plan, including the project site, would result in a less-than-significant impact related to the generation of solid waste and solid waste laws and regulations. Because the proposed project is consistent with the current General Plan land

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34 City of Galt. *2015 Urban Water Management Plan Update*. June 2016.

35 *Ibid.*

36 California Department of Resources Recycling and Recovery (CalRecycle). *Facility/Site Summary Details: Sacramento County Landfill (Kiefer) (34-AA-0001)*. Available at: https://www2.calrecycle.ca.gov/swfacilities/Directory/34-AA-0001/. Accessed January 2020.

use designation, the proposed project would not result in increased solid waste generation beyond what has been previously anticipated for the Fairway Oaks VTM Site by the City and analyzed in the General Plan EIR. In addition, the proposed project would be required to comply with all applicable provisions of Chapter 8.16, Garbage, of the City's Municipal Code.

Therefore, the proposed project would not 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 and would comply with federal, State, and local management and reduction statutes and regulations related to solid waste. Thus, a ***less-than-significant*** impact would occur.

XX. WILDFIRE. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:*	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	✖	☐
b. 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?	☐	☐	✖	☐
c. 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?	☐	☐	✖	☐
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	✖	☐

Discussion

a-d. According to the CAL FIRE Fire and Resource Assessment Program, the project site is not located within or near a state responsibility area or lands classified as a Very High Fire Hazard Severity Zone (VHFHSZ).[37] The nearest VHFHSZ is over eight miles northeast of the project site. Therefore, the proposed project would not be subject to substantial risks related to wildfires, and a ***less-than-significant*** impact would occur.

[37] California Department of Forestry and Fire Protection. *Sacramento County, Very High Fire Hazard Severity Zones in LRA*. July 30, 2008.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE.	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	✖	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	✖	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	✖	☐

Discussion

a. As discussed in Section IV, Biological Resources, of this IS/MND, while a limited potential exists for special-status plant and wildlife or nesting raptors and migratory birds protected by the MBTA to occur on-site, Mitigation Measures IV-1 through IV-14 would ensure that any impacts related to such would be reduced to less-than-significant levels. The project site does not contain any historic, prehistoric, or tribal cultural resources. Nevertheless, Mitigation Measures V-1 and V-2 would ensure that, in the event that previously unknown resources are discovered within the project site, such resources would be protected in compliance with the requirements of CEQA and other State standards.

Considering the above, the proposed project would not degrade the quality of the environment, substantially reduce or impact the habitat or fish or wildlife species, cause fish or wildlife populations to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. Therefore, a ***less-than-significant*** impact would occur.

b. The proposed project, in conjunction with other development within the City of Galt, could incrementally contribute to cumulative impacts in the area.

The proposed project would include annexation of the Island Annexation Area to the City of Galt and a request to pre-zone the area with City zoning designations consistent with the current General Plan land use designation for the site. Future development of the Island Annexation Area would be consistent with the site's existing General Plan land use designations; thus, impacts related to development of the Island Annexation Area have been previously anticipated by the City and evaluated in the General Plan EIR. The proposed development on the Fairway Oaks VTM Site would also be consistent with the General Plan land use designations and, thus, impacts related to development of the Fairway Oaks VTM Site have been previously anticipated by the City and evaluated in the General Plan EIR. As such, development of the Fairway Oaks VTM Site and potential

future development within the Island Annexation Area has been generally anticipated per the General Plan and associated cumulative environmental effects have been analyzed in the General Plan EIR.

In addition, as demonstrated in this IS/MND, all potential environmental impacts that could occur as a result of project implementation would result in no impact or a less-than-significant level through compliance with applicable General Plan policies, Municipal Code Standards, and mitigation measures included in this IS/MND, as well as other applicable local and State regulations.

As noted in Section 21083.3 of the CEQA Guidelines, where a project is consistent with zoning and general plan designations for the site, and an EIR has been certified with respect to that general plan, the analysis of potential environmental impacts resulting from the individual project should focus on those effects that are peculiar to the proposed project. As demonstrated throughout this IS/MND, the proposed project would not result in any significant environmental impacts peculiar to the project, and, thus, the proposed project would not contribute any new or additional impacts not previously analyzed in the General Plan EIR. Therefore, when viewed in conjunction with other closely related past, present, or reasonably foreseeable future projects, development of the proposed project would not result in a cumulatively considerable contribution to cumulative impacts in the City of Galt, and the project's incremental contribution to cumulative impacts would be ***less than significant***.

c. As described in this IS/MND, the proposed project would comply with all applicable General Plan policies, Municipal Code standards, and other applicable local and State regulations. In addition, as discussed in Section III, Air Quality, Section VIII, Greenhouse Gas Emissions, Section IX, Hazards and Hazardous Materials, Section XIII, Noise, and Section XVII, Transportation, of this IS/MND, the proposed project would not cause substantial effects to human beings, including effects related to exposure to air pollutants, hazardous materials, noise, and traffic. Therefore, the proposed project would result in a ***less-than-significant*** impact.