PLANNING COMMISSION AGENDA REPORT

Meeting Date: February 9, 2023
Item 5A

BY Kristyn A. Bitz, Associate Planner
FROM Craig Hoffman, Community Development Director

SUBJECT 2021 – 2029 HOUSING ELEMENT SITE 18 STUDY SESSION

RECOMMENDATION

1. Receive a staff presentation;
2. Comments and questions from the Planning Commission;
3. Open public workshop and receive comments from the public;
4. Additional comments and questions from the Planning Commission;
5. Provide direction to staff and return on March 9 for a public hearing.

LOCATION	The 9.9-acre project site is located south of Simmerhorn Road, east of Highway 99 and north of Boessow Road.
APPLICANT	City of Galt
EXISTING GENERAL PLAN DESIGNATION	Commercial
PROPOSED GENERAL PLAN DESIGNATION	High Density Residential
EXISTING ZONING DESIGNATION	Highway Commercial (HC)
PROPOSED ZONING DESIGNATION	High Density Multiple Family – R4a (20-30)
EXISTING USE	The project site is currently vacant

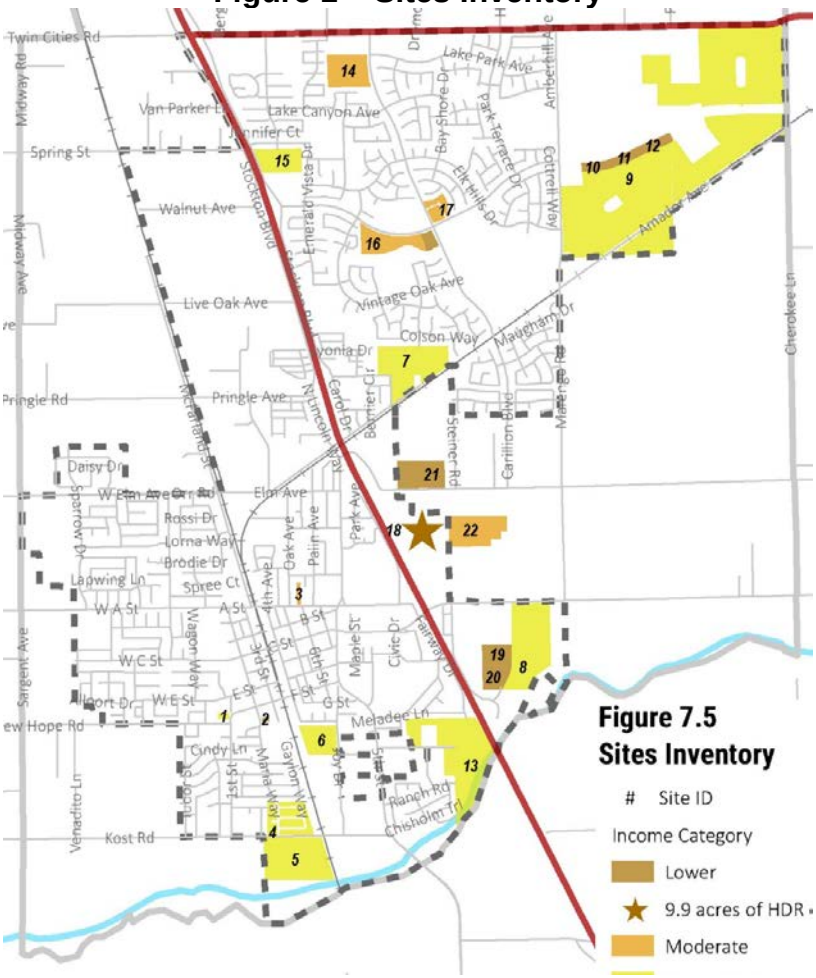
BACKGROUND

The City Council adopted the 2021 – 2029 Housing Element Initial Study / Negative Declaration and the 2021 – 2029 Housing Element at its September 7, 2021 meeting. The Department of Housing and Community Development (HCD) provided a letter identifying areas that needed modification and additional information. These modifications were incorporated into the 2021 – 2029 Housing Element document. The City Council readopted

the California Environmental Quality Act Initial Study/Negative Declaration and approving the General Plan Amendment readopting the 2021-2029 Housing Element at the May 3, 2022 meeting. HCD certified Galt's HE on May 12, 2022.

As part of the housing element update process, the City is required to find sites that are suitable for the development of housing for all income categories and are deemed likely to build out over the planning period. The planning period (also known as 6th cycle planning period) spans from May 15, 2021 to May 15, 2029. The City identified one site that would need a General Plan Amendment and Rezone to meet our regional housing obligation. It is known as 'Site 18'.

Figure 1 – Sites Inventory



Site 18 – (Brown Star) is identified for a General Plan Amendment and Rezone.

The proposed project is located on a currently undeveloped 9.9-acre parcel located west of State Route 99, north of A Street, and south of Simmerhorn Road in the City of Galt, California. The site is identified by Assessor's Parcel Number (APN) 150-0082-023. The 2030 Galt General Plan designates the site as Commercial, and the site is zoned Highway Commercial (HC).

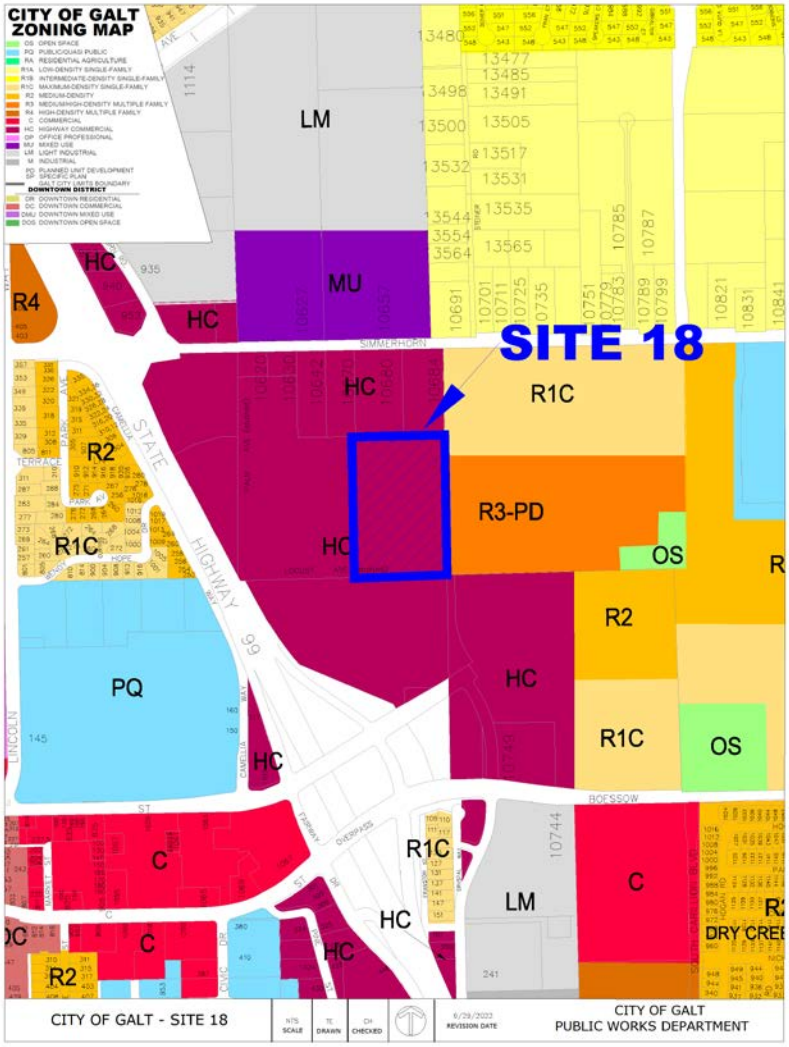
The project site is bound by undeveloped and agricultural land on all sides, with the exception of the approved Simmerhorn Ranch development to the east. However, commercial businesses and single-family residences are located north of the project site along Simmerhorn Road, as well as to the south along Boessow Road, and Galt High School and single-family residences are located west of the site, beyond SR 99.

DISCUSSION

The 2021 – 2029 Housing Element included one site that would require additional land use entitlements for our Housing Element to remain valid. The project will require the preparation and certification of an environmental document, a general plan amendment and a rezone.

The actual development of the site would take place in the future with a design review for multifamily housing.

Figure 2 Project Location



Necessary entitlements for the proposed project include the following:

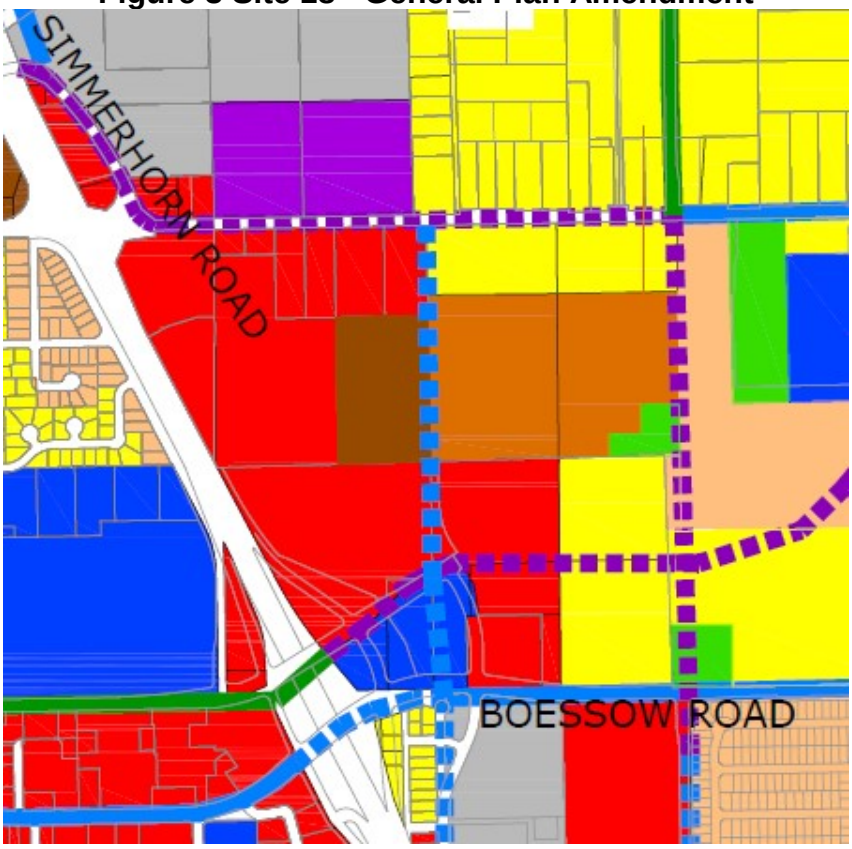
- Approval of an Initial Study/Mitigated Negative Declaration (IS/MND);
- Adoption of a Mitigation Monitoring and Reporting Plan (MMRP);
- Approval of a General Plan Amendment to modify land use designations from Commercial to High Density Residential;
- Approval of a Rezone of the project site from Highway Commercial to High Density Multiple Family – R4a (20-30)

PROJECT COMPONENTS

General Plan Amendment

The proposed project requires a GPA to change the land use designation of the 10-acre project site from Commercial to High Density Residential (see Figure 2). The High Density designation will allow for multiple family units to be built on site. This is a requirement for our housing element.

Figure 3 Site 18 - General Plan Amendment

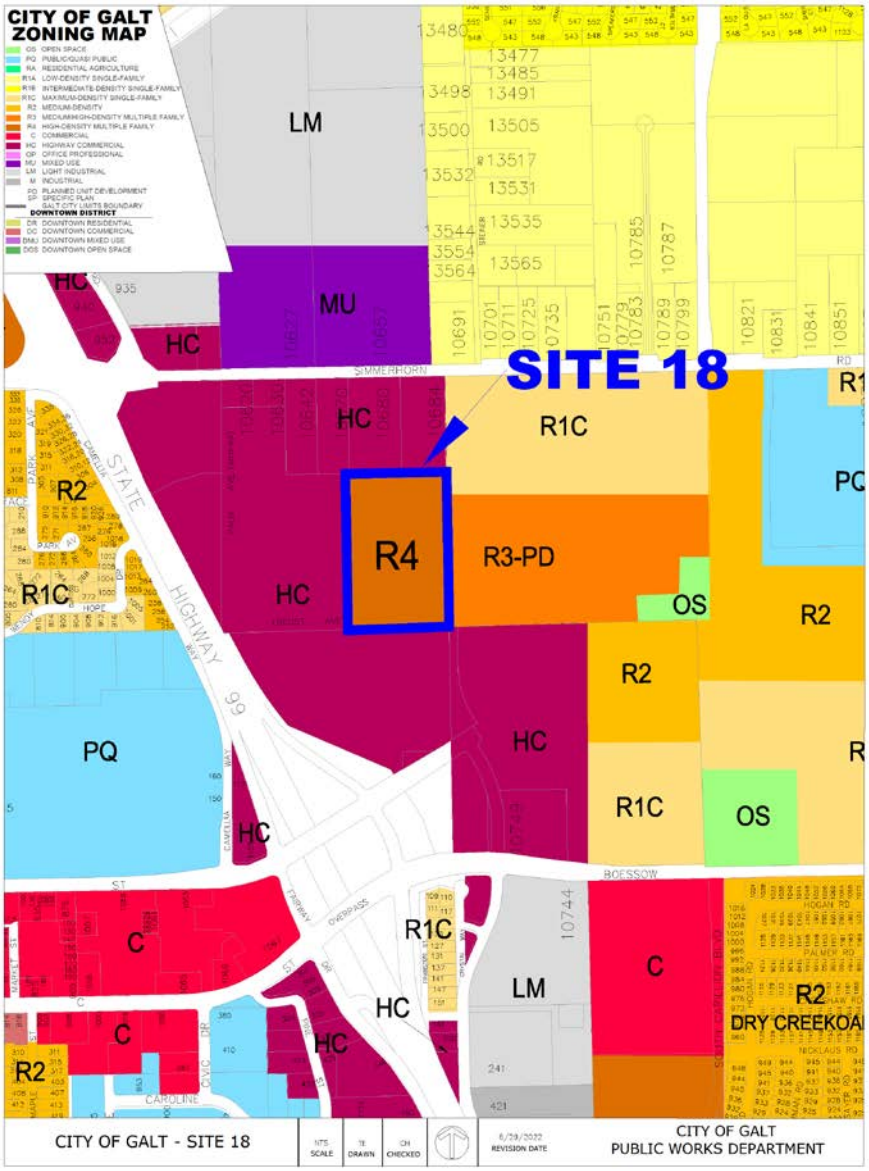


Rezone

The project site will be rezoned to R4a High Density Multiple Family. This is a new zoning designation required by our housing element. All new multifamily zoning will be required to be R4a at 20 to 30 units per acre. The site is identified for 200 units to meet our regional housing allocation.

The R4a zoning designation will be created in our development code and identified on the zoning map. Land uses for the R4 and R4a designation will be the same. The density for R4 is 14 to 24 units per acre, and the R4a is 20 to 30 units per acre. The increased density is required by the State of California.

Figure 4 Site 18 - Rezone



Environmental Review

A mitigated negative Declaration has been prepared in accordance with the California Environmental Quality Act (CEQA). The document was noticed in *The Galt Herald*, provided to the property owner, circulated to appropriate agencies and City departments, and posted to the Office of Planning and Research website. The 30-day public review period commenced on December 7, 2022 and ended on January 9, 2023 at 5:30 p.m.

The proposed project would include a General Plan Amendment to change the 9.9-acre project site from Commercial to High Density Residential, and a Rezone of the project site from HC to High-Density Multiple Family (R4A). The R4A zoning designation will allow for a density of between 20 and 30 dwelling units per acre. As such, while a final site plan has not yet been prepared, buildout of the proposed project is assumed to include the construction of between 200 and 240 high-density residential units, as well as on-site parking, and associated utility connections.

The environmental document, response to comments and mitigation document are attached.

CONCLUSION

The proposed General Plan Amendment and Rezone is appropriate for this location given its location adjacent to Elliott Home's future R3 housing development directly to the east, as well as the future commercial development anticipated to the west and south. The increased density keeps the City in compliance with its Housing Element obligation.

Staff is requesting the Planning Commission take feedback from the public. Suggestions and edits must be determined prior to the official public hearing schedule for the March 9, 2023 Planning Commission meeting.

Attachment 1 – Site 18 Mitigated Negative Declaration
Attachment 2 – Site 18 Response to Comments
Attachment 3 – Site 18 MMRP

NOTICE OF PUBLIC REVIEW PERIOD
AND NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION (MND)
FOR THE HOUSING ELEMENT SITE 18 PROJECT

Notice is hereby given that an MND has been prepared in accordance with the California Environmental Quality Act (CEQA). The public review period and location where documents can be reviewed is noted at the end of this notice.

The Planning Commission and City Council hearings on the project will be separately noticed.

PROJECT TITLE: Housing Element Site 18 Project

PROJECT LOCATION: The proposed project is located on a currently undeveloped 9.9-acre parcel located west of State Route 99, north of A Street, and south of Simmerhorn Road in the City of Galt, California. The site is identified by Assessor's Parcel Number (APN) 150-0082-023. The 2030 Galt General Plan designates the site as Commercial, and the site is zoned Highway Commercial (HC). The project site is bound by undeveloped and agricultural land on all sides, with the exception of the approved Simmerhorn Ranch development to the east. However, commercial businesses and single-family residences are located north of the project site along Simmerhorn Road, as well as to the south along Boessow Road, and Galt High School and single-family residences are located west of the site, beyond SR 99.

HAZARDOUS MATERIALS AND HAZARDOUS WASTE SITES: The project site is not identified on any list of hazardous materials sites compiled pursuant to California Government Code Section 65962.5.

PROJECT DESCRIPTION: The proposed project would include a General Plan Amendment to redesignate the 9.9-acre project site from Commercial to High Density Residential, and a Rezone of the project site from HC to High-Density Multiple Family (R4A). The R4A zoning designation would allow for a density of between 20 and 30 dwelling units per acre. As such, while a final site plan has not yet been prepared, buildout of the proposed project is assumed to include the construction of between 200 and 240 high-density residential units, as well as on-site parking, and associated utility connections.

APPLICANT:
City of Galt
Community Development Department
495 Industrial Drive
Galt, CA 95632

PUBLIC REVIEW PERIOD: The MND prepared for this project will be available for download from the City's website at https://www.cityofgalt.org/government/community-development/planning/development-projects-environmental-documents, under the heading "Development Projects & Environmental Documents."

Written comments on the MND will be accepted during the 30-day public review period commencing **December 7, 2022 and ending January 9, 2023 at 5:30 p.m**. Written comments on the MND must be directed to:

Craig Hoffman, Community Development Director
Galt Planning Department
495 Industrial Drive
Galt, CA 95632
Phone (209) 366-7230
choffman@cityofgalt.org

City of Galt
Community Development Department

Housing Element Site 18 Project

Initial Study

December 2022

Prepared by

RANEY PLANNING & MANAGEMENT, INC. 20 years
1501 Sports Drive, Suite A, Sacramento, CA 95834

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APPENDICES:

Appendix A – Air Quality and GHG Modeling Results

INITIAL STUDY
December 2022

A. BACKGROUND

1.	Project Title:	Housing Element Site 18 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:	Craig Hoffman Community Development Director (209) 366-7230
4.	Project Location:	South of Simmerhorn Road, east of State Route (SR) 99, and north of A Street in the City of Galt, California Assessor's Parcel Number (APN): 150-0082-023
5.	Project Sponsor's Name and Address:	City of Galt Community Development Department 495 Industrial Drive Galt, CA 95632
6.	Existing City of Galt General Plan Designation:	Commercial
7.	Proposed City of Galt General Plan Designation:	High Density Residential
8.	Existing City of Galt Zoning Designation:	Highway Commercial (HC)
9.	Proposed City of Galt City Zoning:	High-Density Multiple Family (R4A)
10.	Required Approvals from Other Public Agencies:	None

11. Surrounding Land Uses and Setting:

The proposed project is located on a currently undeveloped 9.9-acre parcel located west of SR 99, north of A Street, and south of Simmerhorn Road in the City of Galt, California. The site is identified by APN 150-0082-023. The 2030 Galt General Plan designates the site as Commercial, and the site is zoned Highway Commercial (HC). The project site is bound by undeveloped and agricultural land on all sides, with the exception of the approved Simmerhorn Ranch development to the east. However, commercial businesses and single-family residences are located north of the project site along Simmerhorn Road, as well as to the south along Boessow Road, and Galt High School and single-family residences are located west of the site, beyond SR 99.

12. Project Description Summary:

    The proposed project would include a General Plan Amendment to redesignate the 9.9-acre project site from Commercial to High Density Residential, and a Rezone of the project site from HC to R4A. The R4A zoning designation would allow for a density of between 20 and 30 du/ac. As such, while a final site plan has not yet been prepared, buildout of the proposed project is assumed to include the construction of between 200 and 240 high-density residential units, as well as on-site parking, and associated utility connections.

    Although the 2021 – 2029 Housing Element identified the potential for 198 units on the project site, the analysis includes a number between 200 to 240 units to allow for affordable housing density bonus or other site efficiencies.

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

    In compliance with Assembly Bill (AB) 52 (Public Resources Code [PRC] Section 21080.3.1), project notification letters were distributed to the chairpersons of the Wilton Rancheria and the Torres Martinez Desert Cahuilla Indians on May 4, 2022. The Wilton Rancheria responded on June 10, 2022 requesting consultation. The City initiated consultation and provided project information to the tribe. Further response from the Wilton Rancheria has not been received to date.

B. SOURCES

The following documents are referenced information sources utilized for this analysis:

1. California Air Pollution Control Officers Association. *Quantifying Greenhouse Gas Mitigation Measures* [pg. 391]. August 2010.
2. California Air Resources Board. *Air Quality and Land Use Handbook: A Community Health Perspective*. April 2005.
3. California Air Resources Board. *The 2017 Climate Change Scoping Plan Update.* January 20, 2017.
4. CalEPA. *Cortese List Data Resources*. Available at: https://calepa.ca.gov/sitecleanup/corteselist/. Accessed September 2022.
5. California Department of Conservation. *California Important Farmland Finder*. Available at: https://maps.conservation.ca.gov/dlrp/ciff/. Accessed July 2022.
6. California Department of Conservation. *Fault Activity Map of California*. Available at: http://maps.conservation.ca.gov/cgs/fam/. Accessed August 2022.
7. 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 October 2022.
8. California Department of Forestry and Fire Protection. *Sacramento County, Very High Fire Hazard Severity Zones in LRA*. July 20, 2008.
9. 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/SolidWaste/SiteActivity/Details/2070?siteID=2507. Accessed August 2022.
10. California Geologic Survey. *Data Viewer.* Available at: https://maps.conservation.ca.gov/geologichazards/#dataviewer. Accessed August 2022.

11. City of Galt. *2020 Urban Water Management Plan Update*. June 2021.
12. City of Galt. *Bicycle Transportation Plan*. January 2011.
13. City of Galt. *City of Galt 2030 General Plan EIR*. April 2009.
14. City of Galt. *City of Galt General Plan Policy Document*. April 2009.
15. City of Galt. *Community Profile: City of Galt Demographic Overview.* Available at: https://www.cityofgalt.org/government/economic-development/community-profile. Accessed September 2022.
16. City of Galt. *Galt General Plan Update 2030: Environmental Impact Report.* July 2008.
17. City of Galt. *Wastewater Collection System Master Plan* [pg. 4-8]. May 2010.
18. City of Galt. *Wastewater Treatment Plant.* Available at: https://www.cityofgalt.org/government/public-works-department/utilities-division/wastewater. Accessed August 2022.
19. Empire Cat. *Tier 4 Emissions Technology*. Available at http://www.empire-cat.com/Power_Systems/Emissions_Solutions/Tier_4_Technology.aspx. Accessed August 2022.
20. Federal Emergency Management Agency. *Flood Insurance Rate Map 06067C0468J.* Effective October 20, 2016.
21. GHD, Inc. *Simmerhorn Ranch Traffic Impact Study*. November 6, 2019.
22. GHD. *SB 743 – Draft Vehicle Miles Traveled (VMT) Guidance*. April 28, 2022.
23. Institute of Transportation Engineers. *Trip Generation Manual, 9th Edition.* September 2017.
24. Sacramento County. *Sacramento County Open Data: Williamson Act Parcels*. Available at: http://data-sacramentocounty.opendata.arcgis.com/datasets/199810930ef9465a9a1ae0315e5a7535_0?geometry=-121.343%2C38.247%2C-121.216%2C38.271. Accessed July 2022.
25. Sacramento Metropolitan Air Quality Management District. *Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District*. October 2020.
26. Sacramento Metropolitan Air Quality Management District. *Guide to Air Quality Assessment in Sacramento County*. May 2018.
27. Sacramento Metropolitan Air Quality Management District. *Guide to Air Quality Assessment, Chapter 4: Operational Criteria Air Pollutant and Precursor Emissions*. October 2020.
28. Saxelby Acoustics. *Simmerhorn Ranch.* January 9, 2020.
29. Tom Origer & Associates. *Cultural Resources Study for the Housing Element Site 18 Project.* June 3, 2022.
30. U.S. Fish and Wildlife Service. *National Wetlands Inventory.* Available at: https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/. Accessed May 2022.
31. U.S. Department of Agriculture. *Web Soil Survey*. Available at: https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx. Accessed August 2022.
32. Weather Spark. *Average Weather in Galt California, United States*. Available at: https://weatherspark.com/y/1131/Average-Weather-in-Galt-California-United-States-Year-Round. Accessed August 2022.

C. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is "Less Than Significant with Mitigation Incorporated" as indicated by the checklist on the following pages.

☐ **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**

D. 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
Craig Hoffman, Community Development Director Printed Name	City of Galt For

E. BACKGROUND AND INTRODUCTION

This Initial Study/Mitigated Negative Declaration (IS/MND) identifies and analyzes the potential environmental impacts of the Housing Element Site 18 Project (proposed project). The information and analysis presented in this document is organized in accordance with 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 will be implemented in conjunction with the project, as required by CEQA. The mitigation measures will be incorporated into the project through project conditions of approval. The City will adopt findings and a Mitigation Monitoring/Reporting Program for the project in conjunction with approval of the project.

In 2009, the City of Galt completed a comprehensive General Plan Update (GPU). An Environmental Impact Report (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 [CCR], 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 impact discussions for each section of this IS/MND have been largely based on information in the City of Galt General Plan, City of Galt General Plan EIR, as well as technical studies prepared for the proposed project.

State Housing Element law (Government Code Section 65583) requires each local government entity to adopt a comprehensive long-term general plan for the physical development of their City or County. The Housing Element is one of the seven mandated elements composing the General Plan. State law, through the Housing Element, addresses the existing and projected housing needs within all economic segments of the State's various communities, including the City of Galt.

The Regional Housing Needs Allocation (RHNA) is a process established by State law to determine projected housing needs by income category. The State Department of Housing and Community Development (HCD) works with a region's Council of Governments (COG) to determine that need. Sacramento Area Council of Governments (SACOG) consults with HCD to determine RHNA for its six-county region (El Dorado, Placer, Sacramento, Sutter, Yolo, and Yuba) which includes Galt. SACOG determines each city's fair share of that regional housing need. The fair share number is then distributed among five income categories (extremely low-income, very low-income, low-income, moderate-income, and above moderate-income).

As part of the housing element update process, the City is required to find sites that are suitable for the development of housing for all income categories and are deemed likely to build out over the planning period. The planning period (also known as 6th cycle planning period) spans from May 15, 2021 to May 15, 2029. The City of Galt adopted the 2021-2029 Housing Element Update on May 3, 2022, and the 2021-2029 Housing Element Update was subsequently certified by HCD on May 12, 2022. The 2021-2029 Housing Element Update, intended to serve the 6th Cycle, addresses the City of Galt's RHNA. The project site was identified by the 2021-2029 Housing Element Update as suitable for residential development.

In the City of Galt, housing densities are typically lower than major metropolitan areas, and there is concern among City officials that higher densities (and therefore more affordable housing types) are not developable in the City. Following a discussion with Galt's HCD representative, HCD agreed to allow Galt to use a minimum density threshold of 20 dwelling units per acre (du/ac) toward lower-income housing, lower than the Sacramento area regional requirement of 30 dwelling units or more per acre.

Although the 2021 – 2029 Housing Element identified the potential for 198 units on this site, the analysis includes a number between 200 to 240 units to allow for affordable housing density bonus or other site efficiencies. The R4A zoning designation allows a density between 20 and 30 units per acre.

Overall, in compliance with State requirements, the City of Galt has adopted a 2021-2029 Housing Element Update to address the City's compliance with the State-mandated RHNA. The 2021-2029 Housing Element Update identifies 198 units to be built on the project site. In order to maintain compliance with the 2021-2029 Housing Element Update, the City is required to rezone the housing sites identified. For the project site, the City has also opted to prepare as detailed a CEQA analysis as possible, in the hopes that a future proposed project would be consistent with the analysis, and future CEQA analysis would not be required, in order to streamline future development of the project site.

F. PROJECT DESCRIPTION

A detailed description of the proposed project, including the project setting, surrounding land uses, project components, and required City of Galt approvals is provided below.

Project Location and Setting

The project site consists of a currently undeveloped 9.9-acre parcel located east of SR 99, north of A Street, and south of Simmerhorn Road in the City of Galt, California. The site is identified by APN 150-0082-023. The 2030 Galt General Plan designates the site as Commercial, and the site is zoned HC. The project site is bound by undeveloped and agricultural land on all sides, with the exception of the approved Simmerhorn Ranch development to the east (see Figure 1 and Figure 2). However, commercial businesses and single-family residences are located north of the project site along Simmerhorn Road, as well as to the south along Boessow Road, and Galt High School and single-family residences are located west of the site, beyond SR 99.

Project Components

The proposed project would include a General Plan Amendment to redesignate the 9.9-acre project site from Commercial to High Density Residential, and a Rezone of the project site from HC to R4A. The R4A zoning designation would allow for a density of between 20 and 30 du/ac. Buildout of the proposed project would include the construction of between 200 and 240 high-density residential units. The analysis throughout this IS/MND conservatively assumes that the upper limit of 240 units would be developed on-site following the proposed General Plan Amendment and Rezone.

Although the 2021 – 2029 Housing Element identified the potential for 198 units on this site, the analysis includes a number between 200 to 240 units to allow for affordable housing density bonus or other site efficiencies. The R4A zoning designation allows a density between 20 and 30 units per acre.

Due to the fact that a final site plan has not yet been prepared for the proposed project, specific circulation, site access, utility, and construction information is not currently available. All utility improvements would be constructed in accordance with the design standards specified by the City's Municipal Code. The City would serve as the water, storm drainage, and sewer services provider for the proposed project. Pacific Gas & Electric Co. (PG&E), an investor-owned utility headquartered in San Francisco, California and with a service territory throughout Northern California, would provide natural gas to the site. The Sacramento Municipal Utility District (SMUD) would provide electricity.

Figure 1
Regional Project Location

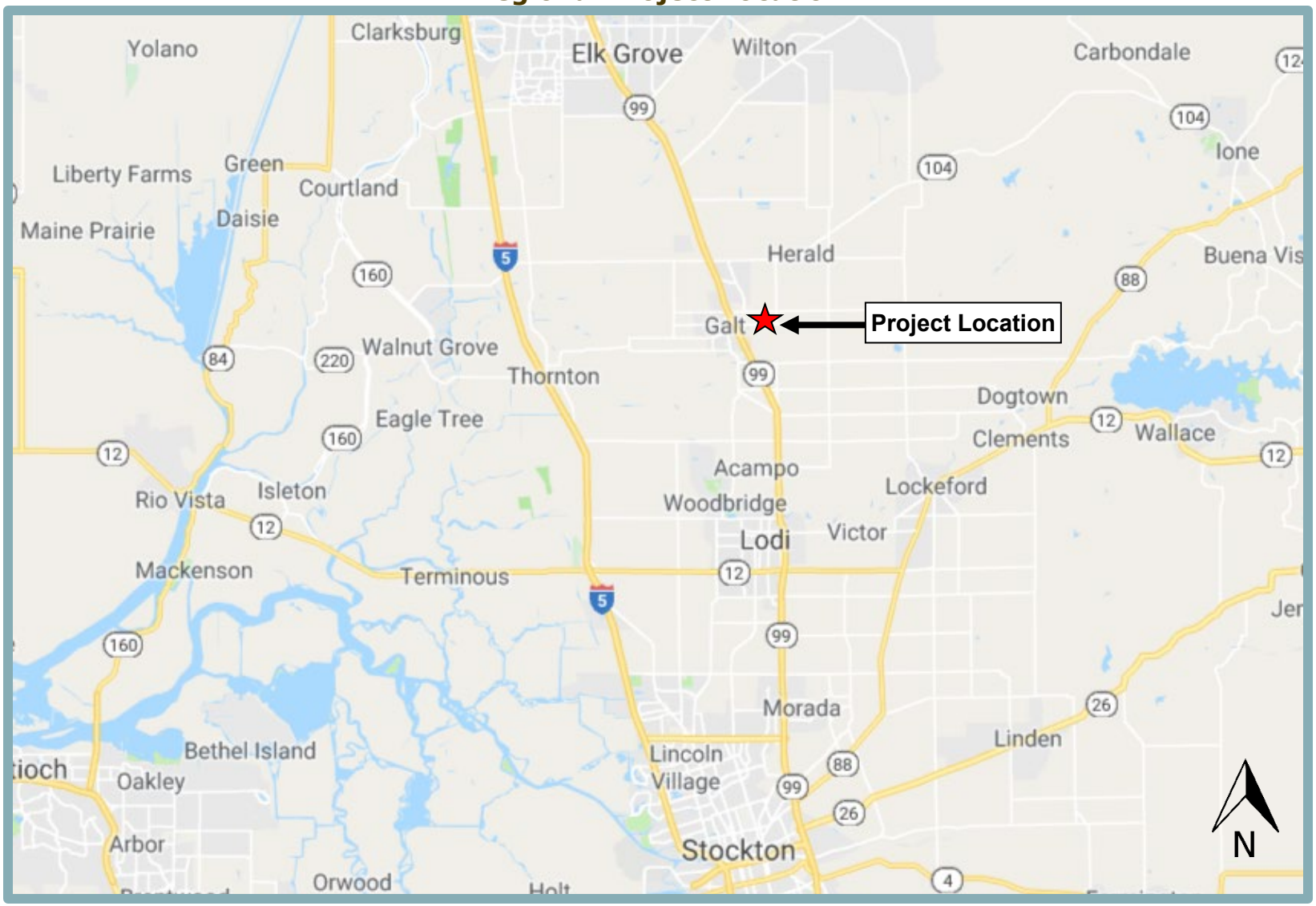

Figure 2
Project Site Boundaries

Discretionary Actions

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

- Adoption of the IS/MND and a Mitigation Monitoring and Reporting Program;
- Approval of a General Plan Amendment; and
- Approval of a Rezone.

G. 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

a,b. 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. In general, a project's impact to a scenic vista would occur if development of the project would substantially change or remove a scenic vista. The General Plan does not designate any scenic vistas within the City's Planning Area. However, the City's General Plan identifies a number of roadways within the General Plan Planning Area that are considered scenic routes. Scenic routes are designated as such because they pass through areas of high scenic value or provide access to important scenic, recreational, cultural, or historic points.

According to the City's General Plan, routes that provide views of the City's scenic qualities could include Christensen Road, Marengo Road, and Twin Cities Road. Of the aforementioned routes, only Marengo Road lies within a mile of the project site, and is located approximately 2,900 feet to the east. Due to the distance of the aforementioned roadways from the project site, the site is not visible from any scenic routes within the City. In addition, the aforementioned roadways are not designated as scenic roadways in any City or County planning documents. According to the California Scenic Highway Mapping System, the project site is not located within the vicinity of an officially designated State Scenic Highway.

Therefore, the proposed project would not substantially affect a scenic vista or substantially damage scenic resources within a state scenic highway, and the project would have ***no impact.***

c. The project site is currently vacant and covered in disked grasses and ruderal vegetation. The site is bordered by rural residential uses to the north, agricultural land to the east, and undeveloped land to the south and west. It should be noted that the City has anticipated development of commercial uses on the project site; however, through approval of a General Plan Amendment and Rezone the proposed project would develop of the site with high-density residential uses only. Sensitive public viewers in the surrounding area would primarily consist of motorists, pedestrians, and bicyclists travelling along local roadways, which include, but are not limited to, Simmerhorn Road, A Street, and Boessow Road.

The scenic vistas mentioned above have not been designated within the City's planning area; however, views of existing open space and agricultural areas are considered by the City to be important views. The project site is located at the eastern edge of the developed area of the City, and predominantly consists of rural residential and agricultural uses. According to the City's General Plan EIR, development along the periphery of the existing City boundary, particularly in the eastern portions of the City's study area that is currently used for open space/agricultural activities, would substantially degrade the visual character or quality of the area. However, the approved Simmerhorn Ranch development is located east of the project site; therefore, the proposed project would ultimately not be located on the periphery of the existing City boundary.

Construction of the proposed project would change the site's existing visual character from a primarily undeveloped area, to a residential area with up to 240 proposed high-density residential units. Development of the project site with commercial uses was previously analyzed within the City's General Plan EIR. Therefore, while the proposed project would include a General Plan Amendment and Rezone, general development of the project site has been previously anticipated and analyzed in the General Plan EIR. In addition, the proposed project would include community design elements which are generally consistent with the City's General Plan policies related to City image and neighborhood design. For example, Policy CC-1.4 of the General Plan requires new neighborhoods to have a unique sense of place that sets them apart from existing neighborhoods. Through the design vernacular of landscape and building architecture, streetscapes, and entry and edge features, the project would provide both community-level and neighborhood identities.

Furthermore, pursuant to Section 18.68.100 of the Galt Municipal Code, future development of multi-family residences on the project site would be subject to Design Review by the City of Galt. The purpose of Design Review is to establish procedures and standards to promote excellence in site planning and building design, to encourage the harmonious appearance of buildings and sites, to ensure that new and modified uses will be compatible with existing and potential development of the surrounding area, to ensure that projects comply with the design standards and intent of specific plans, and to produce and environment of stable and desirable character.

Although implementation of the proposed project would result in a change in visual character from existing conditions, development of the proposed project would be consistent with the residential development to the north. Furthermore, the project site was anticipated for development and would be subject to the City of Galt's Design Review process. As such, the proposed project would not result in a degradation of the existing visual character or quality of the site or the surroundings, and a ***less-than-significant*** impact would occur.

d. Because the project site is currently undeveloped, existing sources of light and glare are not present on-site. As such, future development within the site would have the potential to introduce new sources of light and glare into an area that currently has minimal light or glare. However, it should be noted that following buildout of the anticipated Simmerhorn Ranch project, which is located adjacent to the project site's eastern border, the project area would be exposed to new residential sources of light. Because the project site would be developed with new residential uses, the increase in light resulting from buildout of the proposed project would be consistent with Simmerhorn Ranch. In addition, future development on the project site would be subject to the City of Galt's Design Review

process. The proposed project would also be required to implement all relevant goals and policies of the City's General Plan. Applicable General Plan goals and policies designed to minimize impacts resulting from new sources of substantial light or glare 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 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 impacts of daytime glare.

Thus, impacts related to the creation of a new source of substantial light or glare which would adversely affect day or nighttime views in the area would be ***less than significant***.

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,e. The project site is currently undeveloped, and the site was previously used for agricultural purposes. However, the project site is not currently used for agricultural purposes. According to the California Department of Conservation, the entirety of the project site consists of Farmland of Local Importance.[1] As such, the proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to a non-agricultural use. In addition, the proposed project would not block any rural roads, stub existing water or utility lines, or otherwise involve changes in the existing environment which could result in the conversion of agricultural land adjacent to or in the vicinity of the project site to non-agricultural uses.

The Galt General Plan does not identify farmland resources within the project area, and the site is not designated for farmland uses by the Galt General Plan. However, due to the existing California Department of Conservation designations, implementation of the proposed project would convert land designated as Farmland of Local Importance to non-agricultural uses. Nonetheless, despite the fact that the project would require a Rezone, both the existing zoning designation and the proposed designation are urban in nature. Therefore, development of the project site with non-agricultural uses has been previously analyzed in the General Plan EIR. As a result, the project's impact would be ***less than significant*** related to the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to a non-agricultural use.

b. The project site is not under a Williamson Act contract.[2] In addition, the existing zoning designation of the project site is HC, and the site's existing General Plan land use

[1] California Department of Conservation. *California Important Farmland Finder*. Available at: https://maps.conservation.ca.gov/dlrp/ciff/. Accessed July 2022.

[2] Sacramento County. *Sacramento County Open Data: Williamson Act Parcels*. Available at: http://data-sacramentocounty.opendata.arcgis.com/datasets/199810930ef9465a9a1ae0315e5a7535_0?geometry=-121.343%2C38.247%2C-121.216%2C38.271. Accessed July 2022.

designation is Commercial. As such, the project site is not designated for agricultural use. Therefore, the proposed project would result in ***no impact*** with regard to land that is currently zoned for agricultural use or under a Williamson Act contract.

c,d. The project site is not considered forest land (as defined in PRC section 12220[g]), timberland (as defined by PRC section 4526), and is not zoned Timberland Production (as defined by Government Code section 51104[g]). The project site is not currently zoned as forest land or for timber production. Therefore, the proposed project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production, and the project would not otherwise result in the loss of forest land or conversion of forest land to non-forest use. Thus, ***no impact*** would occur.

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

a,b. The City of Galt is located within the boundaries of the Sacramento Valley Air Basin (SVAB) and 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 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.

Nearly all development projects in the Sacramento region have the potential to generate air pollutants that may increase the difficultly of attaining federal and State AAQS. Therefore, evaluation of air quality impacts is required. In order to evaluate ozone and other criteria air pollutant emissions and support attainment goals for those pollutants for which the area is designated nonattainment, SMAQMD has developed the Guide to Air Quality Assessment in Sacramento County (SMAQMD Guide), which includes recommended thresholds of significance, including mass emission thresholds for construction-related and operational ozone precursors, as the area is under nonattainment for ozone.[3] The SMAQMD's recommended thresholds of significance for

[3] Sacramento Metropolitan Air Quality Management District. *Guide to Air Quality Assessment in Sacramento County*. May 2018.

the ozone precursors reactive organic compounds (ROG) and NO_X, which are expressed in pounds per day (lbs/day) and tons per year (tons/yr), are presented in Table 1. As shown in the table, SMAQMD has construction and operational thresholds of significance for PM_{10} and $PM_{2.5}$ expressed in both lbs/day and tons/yr. Because construction equipment emits relatively low levels of ROG, and ROG emissions from other construction processes (e.g., asphalt paving, architectural coatings) are typically regulated by SMAQMD, SMAQMD has not adopted a construction emissions threshold for ROG.

Table 1
SMAQMD Thresholds of Significance

Pollutant	Construction Thresholds	Operational Thresholds
ROG	--	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

* The thresholds of significance for PM_{10} and $PM_{2.5}$ presented above are only applicable if all feasible best available control technology/best management practices (BACT/BMPs) are applied. If all feasible BACT/BMPs are not applied, then the applicable threshold is zero. All feasible BACT/BMPs would be applied to the proposed project.

Source: SMAQMD, CEQA Guidelines, April 2020.

In order to determine whether the proposed project would result in criteria pollutant emissions in excess of the applicable thresholds of significance presented above, the proposed project's construction and operational emissions were quantified using the web-based California Emissions Estimator Model (CalEEMod) software version 2022 – a statewide model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify air quality emissions, including greenhouse gas (GHG) emissions, from land use projects. The model applies inherent default values for various land uses, including construction data, trip generation rates, vehicle mix, trip length, average speed, etc. However, where project-specific data is available, such data should be input into the model. Accordingly, the proposed project's modeling was updated to assume that construction would commence in June 2023 and take place over approximately one year.

The proposed project's estimated emissions associated with construction and operations and the project's contribution to cumulative air quality conditions are provided below. All CalEEMod results are included as Appendix A to this IS/MND.

Construction Emissions

During construction of the proposed project, various types of equipment and vehicles would temporarily operate on the project site. Construction exhaust emissions would be generated from construction equipment, vegetation clearing and earth movement activities, construction worker commutes, and construction material hauling for the entire construction period. The aforementioned activities would involve the use of diesel- and gasoline-powered equipment that would generate emissions of criteria pollutants. Project construction activities also represent sources of fugitive dust, which includes PM emissions. As construction of the proposed project would generate air pollutant emissions intermittently within the site and vicinity, until all construction has been completed,

construction is a potential concern because the project is in a non-attainment area for ozone, PM_{10}, and $PM_{2.5}$.

To apply the construction thresholds presented in Table 1, projects must implement all feasible SMAQMD BACTs and BMPs related to dust control. The control of fugitive dust during construction is required by SMAQMD Rule 403, and enforced by SMAQMD staff. The BMPs for dust control include the following:

- Water all exposed surfaces two times daily. Exposed surfaces include, but are not limited to soil piles, graded areas, unpaved parking areas, staging areas, and access roads;
- Cover or maintain at least two feet of free board space on haul trucks transporting soil, sand, or other loose material on the site. Any haul trucks that would be traveling along freeways or major roadways should be covered;
- Use wet power vacuum street sweepers to remove any visible trackout mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited;
- Limit vehicle speeds on unpaved roads to 15 miles per hour (mph);
- All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used;
- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes [CCR, Title 13, sections 2449(d)(3) and 2485]. Provide clear signage that posts this requirement for workers at the entrances to the site;
- Provide current certificate(s) of compliance for the California Air Resources Board's (CARB's) In-Use Off-Road Diesel-Fueled Fleets Regulation [CCR, Title 13, sections 2449 and 2449.1]. For more information contact CARB at 877-593-6677, doors@arb.ca.gov, or www.arb.ca.gov/doors/compliance_cert1.html; and
- Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determined to be running in proper condition before it is operated.

Compliance with the foregoing measures is required pursuant to Rule 403, and project construction is assumed to include compliance with the foregoing measures. Consequently, the project PM emissions are assessed in comparison to the thresholds presented in Table 1 above.

According to the CalEEMod results, the proposed project would result in maximum unmitigated construction criteria air pollutant emissions as shown in Table 2.

Table 2
Maximum Unmitigated Construction Emissions

Pollutant	Proposed Project Emissions	Threshold of Significance	Exceeds Threshold?
NO_X	39.8 lbs/day	85 lbs/day	**NO**
PM_{10}	21.6 lbs/day and 0.34 tons/yr	80 lbs/day and 14.6 tons/yr	**NO**
$PM_{2.5}$	11.8 lbs/day and 0.16 tons/yr	82 lbs/day and 14.6 tons/yr	**NO**

Source: CalEEMod, September 2022 (see Appendix A).

As shown in the table, the project's construction emissions would be below the applicable SMAQMD thresholds of significance for NO_X, PM_{10}, and $PM_{2.5}$. In addition, the proposed project would be required to comply with all SMAQMD rules and regulations for construction, which would further reduce construction emissions of criteria pollutants to level lower than those presented in Table 2. The applicable rules and regulations would include, but would not be limited to, the following:

- Rule 403 related to Fugitive Dust;
- Rule 404 Related to Particulate Matter;
- Rule 407 related to Open Burning;
- Rule 442 related to Architectural Coatings;
- Rule 453 related to Cutback and Emulsified Asphalt Paving Materials; and
- Rule 460 related to Adhesives and Sealants.

Thus, in accordance with SMAQMD guidance, the proposed project would be considered to have a less-than-significant impact on air quality during construction.

Operational Emissions

Operational emissions of ROG, NO_X, and PM would be generated by the proposed project from both mobile and stationary sources. Day-to-day activities, such as the future vehicle trips to and from the project site, would make up the majority of the mobile emissions. Emissions would also occur from area sources, such as landscape maintenance equipment exhaust.

The estimated operational emissions for the project are presented below in Table 3. It should be noted that the proposed project would not involve installation or operation of any pieces of equipment that would require implementation of SMAQMD's BACTs; therefore, the proposed project would be subject to SMAQMD's mass emissions thresholds for PM_{10} and $PM_{2.5}$.

Table 3
Maximum Unmitigated Operational Emissions

Pollutant	Project Emissions	Operational Threshold	Exceeds Threshold?
ROG	14.0 lbs/day	65 lbs/day	**NO**
NO_X	11.2 lbs/day	65 lbs/day	**NO**
PM_{10}	5.99 lbs/day and 1.04 tons/yr	80 lbs/day and 14.6 tons/yr	**NO**
$PM_{2.5}$	1.24 lbs/day and 0.21 tons/yr	82 lbs/day and 15 tons/yr	**NO**

Source: CalEEMod, September 2022 (see Appendix A).

As Table 3 indicates, the project's maximum unmitigated operational emissions would be below the applicable thresholds of significance. Therefore, operations associated with development of the project would not substantially contribute to the SVAB's non-attainment status for ozone or PM_{10}, and a less-than-significant impact would occur associated with operations.

Cumulative Emissions

A cumulative impact analysis considers a project over time in conjunction with other past, present, and reasonably foreseeable future projects whose impacts might compound those of the project being assessed. Due to the dispersive nature and regional sourcing

of air pollutants, air pollution is already largely a cumulative impact. The non-attainment status of regional pollutants, including ozone and PM, is a result of past and present development and, thus, cumulative impacts related to these pollutants could be considered cumulatively significant.

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 non-attainment, consistent with applicable air quality plans. As future attainment of AAQS is a function of successful implementation of SMAQMD's planning efforts, according to the SMAQMD Guide, by exceeding the SMAQMD's project-level thresholds for construction or operational emissions, a project could contribute to the region's non-attainment status for ozone and PM emissions and could be considered to conflict with or obstruct implementation of the SMAQMD's air quality planning efforts.

As discussed above, the proposed project would result in construction and operational emissions below all applicable SMAQMD thresholds of significance for criteria pollutants. Therefore, the project would not be considered to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment, and impacts would be considered less than significant.

Conclusion

As discussed above, both construction-related and operational emissions resulting from implementation of the proposed project would be below SMAQMD's applicable thresholds of significance. Because the proposed project would result in emissions below the applicable thresholds of significance during both construction and operations, the proposed project would not violate an AAQS, contribute substantially to an existing or projected air quality violation, or result in PM concentrations greater than the applicable thresholds. Thus, 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. In the vicinity of the project site, the nearest existing sensitive land uses include the single-family residences located approximately 500 feet north of the project site. The major pollutant concentrations of concern are localized CO, toxic air contaminants (TACs), and criteria pollutants, which are discussed in further detail below.

Localized CO Emissions

Localized concentrations of CO are related to the levels of traffic and congestion along streets and at intersections. Pursuant to the SMAQMD Guide, 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.[4] The proposed project would not involve operational changes that could result in long-term generation of CO. The use of construction equipment at the project site would result in limited generation of CO; however, the total amount of CO emitted by construction equipment would be minimal and would not have the potential to result in health risks to any nearby receptors. Consequently, the proposed project would result in a less-than-significant impact 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.[5] 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-related activities have the potential to generate concentrations of TACs, specifically DPM, from on-road haul trucks and off-road equipment exhaust emissions. However, construction would be temporary and would occur over a relatively short duration in comparison to the operational lifetime of the proposed project. While methodologies for conducting health risk assessments are associated with long-term exposure periods (e.g., over a 30-year period or longer), construction activities associated with the proposed project were estimated to occur over an approximately one-year period. Only portions of the site would be disturbed at a time throughout the construction period, with operation of construction equipment occurring intermittently throughout the course of a day rather than continuously at any one location on the project site. In addition, all construction equipment and operation thereof would be regulated pursuant to the In-Use Off-Road Diesel Vehicle Regulation. The In-Use Off-Road Diesel Vehicle Regulation includes emissions reducing requirements such as limitations on vehicle idling, disclosure, reporting, and labeling requirements for existing vehicles, as well as standards relating to fleet average emissions and the use of BACTs. Additionally, DPM is a highly dispersive gas, and concentrations of DPM decline rapidly with distance.[6] Considering the nearest sensitive receptors are located approximately 500 feet north of the site, construction activity would occur with ample separation from existing developments, which would allow for the dispersion of construction-related DPM, prior to DPM emissions reaching any nearby receptors. Furthermore, the prevailing wind direction in the project area is most

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4 Sacramento Metropolitan Air Quality Management District. *Guide to Air Quality Assessment, Chapter 4: Operational Criteria Air Pollutant and Precursor Emissions*. October 2020.

5 California Air Resources Board. *Air Quality and Land Use Handbook: A Community Health Perspective*. April 2005.

6 *Ibid.*

often from the west.[7] Therefore, any particulate emissions generated by construction of the proposed project would primarily flow towards the east, and not in the direction of the nearby receptors. 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, and the proposed project would not expose any existing sensitive receptors to any new permanent or substantial TAC emissions.

Impacts of the environment on a project (as opposed to impacts of a project on the environment) are beyond the scope of required CEQA review.[8] While not a CEQA consideration, it should be noted that the project site is located approximately 550 feet east of SR 99. As discussed above, CARB provides recommended setback distances for sensitive land uses from major sources of TACs, including, freeways and high traffic roads. However, the recommended setback distance for sensitive land uses from freeways and high traffic roads is 500 feet. Therefore, the proposed project would comply with the CARB's recommendations. In addition, according to the CARB Handbook, California freeway studies show an approximately 70 percent drop off in particulate pollution levels at 500 feet. As a result, the proposed project would not expose any future sensitive receptors at the project site 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 analysis of 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. SMAQMD released the *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 SMAQMD's jurisdiction. [9] 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 Guidance was prepared by conducting regional photochemical modeling, and relies on the U.S. Environmental Protection Agency's (USEPA's) Benefits Mapping and Analysis Program (BenMAP) to assess health impacts from ozone and $PM_{2.5}$. SMAQMD has prepared two tools that are intended for use in analyzing health risks from criteria

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7 Weather Spark. *Average Weather in Galt California, United States*. Available at: https://weatherspark.com/y/1131/Average-Weather-in-Galt-California-United-States-Year-Round. Accessed August 2022.

8 "[T]he purpose of an EIR is to identify the significant effects of a project on the environment, not the significant effects of the environment on the project." (*Ballona Wetlands Land Trust v. Town of Los Angeles,* (2011) 201 Cal.App.4th 455, 473 (Ballona).) The California Supreme Court recently held that "CEQA does not generally require an agency to consider the effects of existing environmental conditions on a proposed project's future users or residents. What CEQA does mandate… is an analysis of how a project might exacerbate existing environmental hazards." (*California Building Industry Assn. v. Bay Area Air Quality Management Dist*. (2015) 62 Cal.4th 369, 392; see also *Mission Bay Alliance v. Office of Community Investment & Infrastructure* (2016) 6 Cal.App.5th 160, 197 ["identifying the effects on the project and its users of locating the project in a particular environmental setting is neither consistent with CEQA's legislative purpose nor required by the CEQA statutes"], quoting *Ballona, supra*, 201 Cal.App.4th at p. 474.).

9 Sacramento Metropolitan Air Quality Management District. *Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District*. October 2020.

pollutants. Small projects with criteria pollutant emissions close to or below SMAQMD's adopted thresholds of significance may use the Minor Project Health Effect 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. Considering the proposed project would result in emissions lower than the SMAQMD's thresholds of significance, the proposed project would qualify for use of the Minor Project Health Effects Screening Tool. It is important to note, however, that the Minor Project Health Effects Screening Tool applies the assumption that all small projects result in emissions of criteria pollutants equal to the SMAQMD thresholds of significance. As shown in Table 3, the proposed project would result in operational emissions well below the SMAQMD thresholds of significance and, thus, the health impacts calculated for the proposed project using in the Minor Project Health Effects Screening Tool are highly conservative. The Project's actual health impacts associated with criteria pollutant emissions would be expected to be much less than what is presented herein based on the aforementioned SMAQMD tool. Results from the Minor Project Health Effects Screening Tool are shown in Table 4 below.

As shown in the table, according to the Minor Project Health Effects Screening Tool, which is based on the highly conservative assumption that the proposed project would emit criteria pollutants at levels equal to the SMAQMD thresholds of significance, the proposed project could result in one premature death per year due to the project's $PM_{2.5}$ emissions and 0.014 premature deaths per year due to the project's ozone emissions. Such numbers represent a very small increase over the background incidence of premature deaths due to $PM_{2.5}$ and ozone concentrations (0.0023 percent and 0.000045 percent, respectively). In addition, according to the Minor Project Health Effects Screening Tool, $PM_{2.5}$ emissions from the proposed project could result in 0.55 asthma-related emergency room visits, and ozone emissions from the proposed project could result in 0.30 asthma-related emergency room visits. Such numbers represent a minute increase over the background level of asthma-related emergency room visits (0.003 percent and 0.0035 percent, respectively).

As noted above, because the proposed project's emissions would be substantially below the SMAQMD thresholds of significance, the project's actual health impacts associated with criteria pollutant emissions would be much lower than what is presented above.

Furthermore, the SMAQMD criteria pollutant thresholds of significance were established with consideration given to the health-based air quality standards established by the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS), and are designed to aid the district in achieving attainment of the NAAQS and CAAQS. The thresholds of significance represent emissions levels that would ensure that project-specific emissions would not inhibit attainment of AAQS and, therefore, would not adversely affect public health. Considering that implementation of the proposed project would not result in emissions of criteria pollutants that would exceed the SMAQMD standards, the proposed project would not inhibit attainment of AAQS and would not result in adverse health impacts related to the emission of criteria pollutants.

The results of the Minor Project Health Effects Screening Tool have been presented for informational purposes only. Overall, because the 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.

Table 4
Health Effects from Proposed Project

Health Endpoint	Age Range[1]	Incidences Across the 5-Air-District Region Resulting from Project Emissions (per year)[2] (Mean)	Percent of Background Health Incidences Across the 5-Air-District Region[3] (%)	Total Number of Health Incidences Across the 5-Air-District Region (per year)[4]
Respiratory $PM_{2.5}$				
Emergency Room Visits, Asthma	0-99	0.55	0.0030	18,419
Hospital Admissions, Asthma	0-64	0.035	0.0019	1,846
Hospital Admissions, All Respiratory	65-99	0.16	0.00083	19,644
Cardiovascular $PM_{2.5}$				
Hospital Admissions, All Cardiovascular (less Myocardial Infarctions)	65-99	0.088	0.00036	24,037
Acute Myocardial Infarction, Nonfatal	18-24	0.000042	0.0011	4
Acute Myocardial Infarction, Nonfatal	25-44	0.0040	0.0013	308
Acute Myocardial Infarction, Nonfatal	45-54	0.0099	0.0013	741
Acute Myocardial Infarction, Nonfatal	55-64	0.016	0.0013	1,239
Acute Myocardial Infarction, Nonfatal	65-99	0.055	0.0011	5,052
Mortality $PM_{2.5}$				
Mortality, All Cause	30-99	1.0	0.0023	44,766
Respiratory Ozone				
Hospital Admissions, All Respiratory	65-99	0.023	0.00012	19,644
Emergency Room Visits, Asthma	0-17	0.12	0.0021	5,859
Emergency Room Visits, Asthma	18-99	0.18	0.0014	12,560
Mortality Ozone				
Mortality, Non-Accidental	0-99	0.014	0.000045	30,386

[1] Affected age ranges are shown. Other age ranges are available, but the endpoints and age ranges shown here are the ones used by the USEPA in their health assessments. The age ranges are consistent with the epidemiological study that is the basis of the health function.

[2] Health effects are shown in terms of incidences of each health endpoint and how it compares to the base (2035 base year health effect incidences, or "background health incidence") values. Health effects are shown for the 5-Air-District Region.

[3] The percent of background health incidence uses the mean incidence. The background health incidence is an estimate of the average number of people that are affected by the health endpoint in a given population over a given period of time. In this case, the background incidence rates cover the 5-Air-District Region (estimated 2035 population of 3,271,451 persons). Health incidence rates and other health data are typically collected by the government as well as the World Health Organization. The background incidence rates used here are obtained from BenMAP.

[4] The total number of health incidences across the 5-Air-District Region is calculated based on the modeling data. The information is presented to assist in providing overall health context.

Source: SMAQMD, Minor Project Health Effects Screening Tool. August 2022 (see Appendix A).

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. Pollutants of principal concern include emissions leading to odors, emission of dust, or emissions considered to constitute air pollutants. Air pollutants have been discussed in sections "a" through "c" above. Therefore, the following discussion focuses on emissions of odors and dust.

Odors

While offensive odors rarely cause physical harm, they can be unpleasant, leading to considerable annoyance and distress among the public and can generate citizen complaints to local governments and air districts. 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 or formulaic methodologies to determine the presence of a significant odor impact are difficult. Adverse effects of odors on residential areas and other sensitive receptors warrant the closest scrutiny; but consideration should also be given to other land use types where people congregate, such as recreational facilities, worksites, and commercial areas. The potential for an odor impact is dependent on a number of variables, including the nature of the odor source, distance between a receptor and an odor source, and local meteorological conditions.

Examples of land uses that have the potential to generate considerable odors include, but are not limited to, wastewater treatment plants, landfills, confined animal facilities, composting stations, food manufacturing plants, refineries, and chemical plants. The proposed project would not introduce any such land uses. In addition, the proposed project would be subject to all relevant regulations related to odors. The 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 made 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.

Dust

As noted previously, construction of the proposed project is required to comply with all applicable SMAQMD rules and regulations, including, but not limited to, Rule 403 (Fugitive Dust) and Rule 404 (Particulate Matter), and all applicable BACTs and BMPs. Furthermore, all projects within Sacramento County are required to implement the SMAQMD's Basic Construction Emission Control Practices (BCECP). Compliance with SMAQMD rules and regulations and BCECP would help to ensure that dust is minimized during project construction. Following project construction, vehicles operating within the project site would be limited to paved areas of the site, which would not have the potential

to create substantial dust emissions. Thus, project operations would not include sources of dust that could adversely affect a substantial number of people.

Conclusion

For the reasons discussed above, construction and operation of the proposed project would not result in emissions, such as those leading to odors and/or dust, that would adversely affect a substantial number of people, and a ***less-than-significant*** impact would occur.

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 project site is currently vacant and undeveloped. The site consists of regularly disked valley grassland. The project site is bound by undeveloped and agricultural land on all sides. However, commercial businesses and single-family residences are located north of the project site. Although the site does not contain wetland features or waterways, a wetland lies adjacent to the northern border of the project site.

Special-status species include those plant and wildlife species that have been formally listed, are proposed as endangered or threatened, or are candidates for such listing under the federal and State Endangered Species Acts. Both acts afford protection to listed and proposed species. In addition, California Department of Fish and Wildlife (CDFW) Species of Special Concern, which are species that face extirpation in California if current population and habitat trends continue, U.S. Fish and Wildlife Service (USFWS) Birds of Conservation Concern, sensitive species included in USFWS Recovery Plans, and CDFW special-status invertebrates are all considered special-status species. Although CDFW Species of Special Concern generally do not have special legal status, they are given special consideration under CEQA. 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. In addition, plant species on California Native Plant Society (CNPS) Lists 1 and 2 are considered special-status plant species and are protected under CEQA.

The project site is located within the boundaries of the South Sacramento Habitat Conservation Plan (SSHCP), which is intended to provide an effective framework to protect natural resources in south Sacramento County, including special-status species.

In August of 2022, a query of the California Natural Diversity Data Base (CNDDB) was conducted for published records of special-status plant and wildlife species for the Galt USGS 7.5" quadrangle, in which the project site occurs. The intent of the database review was to identify documented occurrences of special-status species in the vicinity of the project area, to determine their locations relative to the project site.

The potential for species covered by the SSHCP and other special-status species to occur on the project site is discussed in further detail below.

Special-Status Plants

Based on the results of the CNDDB search, at total of 21 special-status plant species have been recorded within five miles of the site. Of the 21 species, only two are considered absent from or unlikely to occur on the site due to a lack of suitable habitat, such as vernal pools and serpentine or alkaline soils. Of the 19 special-status plant species with the potential to occur on-site, six are SSHCP-covered species: dwarf downingia, Boggs Lake hedge-hyssop, legenere, Sanford's arrowhead, slender Orcutt grass, and Sacramento Orcutt grass.

Although the project site does not contain wetlands, a wetland exists adjacent to the northern border of the project site; thus, because a final site plan has not been prepared, 17 special-status plant species that rely on wetland habitats were determined to have the potential to be impacted by the proposed project: watershield, succulent owl's-clover, Bolander's water-hemlock, Peruvian dodder, dwarf downingia, Boggs Lake hedge-hyssop, woolly rose-mallow, Delta tule pea, legenere, Mason's lilaeopsis, Delta mudwort, slender Orcutt grass, Sacramento Orcutt grass, Sanford's arrowhead, marsh skullcap, side-flowering skullcap, and Suisun Marsh aster.

In addition, two special-status plant species have the potential to occur on-site, but do not require a wetland habitat: bristly sedge and saline clover. It should be noted that the project site has been regularly disked and was subject to agricultural use in the past; thus, the site has been previously disturbed, and the aforementioned species are unlikely to occur on-site. Nonetheless, impacts related to the disturbance of special-status plant species could be potentially significant if special-status plant species are present on-site.

Special-Status Wildlife

Based on the results of the CNDDB search, a total of 24 special-status wildlife species have been recorded within five miles of the site. Of the 24 species, 14 species would be absent from or unlikely to occur on the site due to a lack of suitable habitat. Of the 10-remaining special-status wildlife species, Swainson's hawk and American badger are the most likely to occur on the project site due to habitat requirements. Additionally, as discussed above, although the project site does not contain wetlands, a wetland exists adjacent to the northern border of the project site; thus, in an abundance of caution, because a final site plan has not been prepared, eight remaining special-status wildlife species that rely on wetland habitats have the potential to be impacted by the proposed project: tricolored blackbird, white-tailed kite, western pond turtle, California black rail, western spadefoot, yellow-headed blackbird, California tiger salamander, and giant garter

snake. Furthermore, other avian species protected by the MBTA could use the existing grassland as foraging and potential nesting habitat. All the aforementioned species, with the exception of the California black rail and yellow-headed blackbird, are protected species under the SSHCP.

Tricolored Blackbird

While the project site does not contain suitable foraging or nesting-foraging habitat for the tricolored blackbird, the adjacent wetlands to the north may offer suitable habitat. Thus, the proposed project could have a significant adverse effect on the species if the proposed project were to result in the disturbance of the adjacent wetland.

White-Tailed Kite

The CNDDB results documented four occurrences of the white-tailed kite within five miles of the project site. The wetlands adjacent to the project site have the potential to provide suitable habitat for white-tailed kite. Thus, the proposed project could have a significant adverse effect on the species if the proposed project were to result in the disturbance of the adjacent wetland.

Western Pond Turtle

The western pond turtle is known to occur within a variety of fresh and brackish water habitats including marshes, lakes, ponds, and slow-moving streams. The CNDDB results documented 19 occurrences within five miles of the project site. Due to the presence of suitable habitat within the wetland located north of the project site, and the known occurrence of the species, the project could result in a potentially significant impact to the species.

California Black Rail

Inhabits freshwater marshes, wet meadows, and shallow margins of saltwater marshes bordering larger bays. Due to the presence of the wetland located to the north of the project site, the potential exists for the California black rail to occur on-site, and a significant impact could occur if the proposed project were to result in the disturbance of the adjacent wetland.

Western Spadefoot

The wetland to the north of project site represents potential habitat for the western spadefoot. Necessary habitat for the western spadefoot includes loose soils for underground burrowing and vernal pools as breeding site. Thus, the proposed project could result in a significant impact to the western spadefoot if the proposed project were to result in the disturbance of the adjacent wetland.

Yellow-Headed Blackbird

Yellow-headed blackbird breeds and roosts in freshwater wetlands with dense, emergent vegetation such as cattails. The species typically forages in fields, and, during the winter, in large, open agricultural areas. Due to the presence of the wetland located to the north of the project site, potential exists for the yellow-headed blackbird to occur on-site, and a significant impact could occur if the proposed project were to result in the disturbance of the adjacent wetland.

California Tiger Salamander

The project site is bordered to the north by a wetland which could provide habitat for the California tiger salamander. As such, the potential exists for the California tiger salamander to enter the project site from the adjacent habitats. Thus, the proposed project could result in a significant impact to the California tiger salamander if the proposed project were to result in the disturbance of the adjacent wetland.

Giant Garter Snake

The wetland to the north of the site supports potential habitat for the species. As such, the construction of the proposed project could result in a significant impact to giant gartersnake if the proposed project were to result in the disturbance of the adjacent wetland.

Swainson's Hawk

Trees adjacent to the project site present suitable nesting habitat for Swainson's hawk. In addition, the agricultural fields located north and east of the site are considered suitable foraging habitat for the species. Given that the site presents suitable nesting and foraging habitat for Swainson's hawk, development of the site could result in a significant adverse impact to the species.

American Badger

The presence of agricultural land surrounding the project site presents suitable habitat for American badger. In addition, the agricultural lands have a high likelihood to support California ground squirrels, which provide a prey base for the species. Thus, in the event that such species occur on-site, ground-disturbing activities could result in an adverse effect to American badger.

Nesting Raptors and Migratory Birds

The project site is in the vicinity of existing trees that could be used by raptors and migratory birds protected by the MBTA for nesting. Construction activities that adversely affect the nesting success of raptors and migratory birds (i.e., lead to the abandonment of active nests) or result in mortality of individual birds constitute a violation of State and federal laws. Thus, in the event that such species occur on-site during the breeding season, the proposed project could result in an adverse effect to species protected under the MBTA.

Conclusion

Based on the above, 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 would reduce the above potential impact to a *less-than-significant* level.

Prepare a Biological Report

IV-1. *In conjunction with submittal of an application for future development within the project site, the future project applicant shall retain a qualified biologist to conduct a preconstruction survey to determine the presence of any sensitive natural communities, wetlands, or Waters of the U.S. on the project site. The written results of the pre-construction survey shall be submitted to the City Community Development Department for review. If the aforementioned communities or waters are determined be absent from the project site, then additional action would not be necessary. If any of the above communities or waters are found, then the biologist shall include specific mitigation measures in the Biological Report should the habitat be located on the project site. Mitigation measures may include non-disturbance buffers, construction monitoring, preserving and enhancing existing waters or sensitive communities, or obtaining the proper Clean Water Act certification.*

Obtain an SSHCP Permit

IV-2. *Before the approval of grading and improvement plans and before any groundbreaking activity associated with the project, the project applicant 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; and*
- *Results of Covered Species (special-status species) Pre-Construction Surveys.*

Special-Status Plant Species

IV-3(a). *If a Covered Activity project site contains SSHCP-modeled habitat for Bogg's Lake hedge-hyssop (Gratiola heterosepala), dwarf downingia (Downingia pusilla), legenere (Legenere limosa), slender Orcutt grass (Orcuttia tenuis), Sacramento Orcutt grass (Orcuttia viscida), 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 shall identify and map plant species occurrences according to the protocols. See Chapter 10 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 remainder of the mitigation measures for plants are not necessary.

IV-3(b). *If a rare plant listed in Mitigation Measure IV-3(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. *During the appropriate bloom period prior to construction, a qualified botanist shall conduct special-status plant species presence/absence surveys within areas proposed for grading or modification, in accordance with Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (California Department of Fish and Wildlife, 2009) to determine which special-status plants with the potential to occur on site are evident and identifiable on-site. These surveys can be conducted concurrently with surveys required under IV-3(a). If any sensitive plant species are observed during the presence/ absence surveys and it is determined that such plants would be impacted by project activities, CDFW and the USFWS (if the species is also on the federal list of sensitive species) shall be consulted to determine appropriate measures to ensure the protection of the species and its habitat. Such mitigation shall include avoidance or, if avoidance is not possible, relocation of affected plants to a mitigation site located in similar habitat within the project site in an area where no impacts are expected to occur. The relocation site shall be in an area that is protected from impacts through human disturbance by fencing during the season that special-status plant species would be evident and identifiable—i.e., during the recognized bloom period. The results of the special-status plant surveys shall be submitted to the City of Galt Community Development Department for review and approval.*

Swainson's Hawk

IV-5. *If a development project in the project site contains Modeled Covered Species Habitat for Swainson's Hawk (Buteo swainsoni), the Project Proponent shall comply with SSHCP AMMs SWHA-1 (Swainson's hawk surveys) and SWHA-2 (Swainson's hawk pre-construction surveys) and based on the results of surveys conducted under those measures, comply with SWHA-3 (Swainson's hawk nest buffer) and SWHA-4 (Swainson's hawk nest buffer monitoring).*

American Badger

IV-6. *There are no species-specific SSHCP AMMs for American badger. However, this is a Covered Species, and the Project applicants shall comply with SSHCP requirements, In-Lieu Fee Program, and relevant AMMs.*

Tricolored Blackbird

IV-7. *If a development project in the project site contains Modeled Covered Species Habitat for Tricolored Blackbird (Agelaius tricolor), the Project*

Proponent shall comply with SSHCP AMMs TCB- 1(tricolored blackbird surveys) and TCB-2 (tricolored blackbird pre-construction surveys) and based on the results of surveys conducted under those measures, comply with TCB-3 (tricolored blackbird nest buffer), TCB-4 (tricolored blackbird nest buffer monitoring), and TCB-5 (timing of pesticide use and harvest timing on agricultural preserve).

White-Tailed Kite

IV-8. *The project applicants shall comply with SSHCP AMMs RAPTOR-1 (raptor surveys) and RAPTOR-2 (raptor pre-construction surveys), and based on the results of surveys conducted under those measures, comply with RAPTOR-3 (raptor nest/roost buffer), and RAPTOR-4 (raptor nest/roost buffer monitoring.*

Western Pond Turtle

IV-9. *If a development project in the project site contains Modeled Covered Species Habitat for Western Pond Turtle (Actinemys marmorata), the Project Proponent shall comply with SSHCP AMMs WPT-1 (Western Pond Turtle Survey), WPT-2 (Western Pond Turtle Work Window), WPT-3 (Western Pond Turtle Monitoring), WPT-4 (Western Pond Turtle Habitat Dewatering and Exclusion), WPT-5 (Avoid Western Pond Turtle Entrapment), WPT-6 (Erosion Control Materials in Western Pond Turtle Habitat), WPT-7 (Western Pond Turtle Modeled Habitat Speed Limit), WPT-8 (Western Pond Turtle Encounter Protocol), and WPT-9 (Western Pond Turtle Post-Construction Restoration.*

Western Spadefoot

IV-10. *If a development project in the project site contains Modeled Covered Species Habitat for Western Spadefoot (Spea hammondii), the Project Proponent shall comply with SSHCP AMMs WS-1(Western Spadefoot Work Window), WS-2 (Western Spadefoot Exclusion Fencing), WS-3 (Western Spadefoot Monitoring), WS-4 (Avoid Western Spadefoot Entrapment), WS-5 (Erosion Control Materials in Western Spadefoot Habitat), and WS-6 (Western Spadefoot Encounter Protocol).*

California Tiger Salamander

IV-11. *If a development project in the project site contains Modeled Covered Species Habitat for California Tiger Salamander (Ambystoma californiense), the Project Proponent shall comply with SSHCP AMMs CTS-1 (California Tiger Salamander Daily Construction Schedule), CTS-2 (California Tiger Salamander Exclusion Fencing), CTS-3 (California Tiger Salamander Monitoring), CTS-4 (Avoid California Tiger Salamander Entrapment), CTS-5 (California Tiger Salamander Encounter Protocol), CTS-6 (Erosion Control Materials in California Tiger Salamander Habitat), and CTS-7 (Rodent Control).*

Giant Garter Snake

IV-12. *If a development project in the project site contains Modeled Covered Species Habitat for Giant Garter Snake (Thamnophis gigas), the Project Proponent shall comply with SSHCP AMMs GGS-1 (Giant Garter snake*

Surveys), GGS-2 (Giant Garter snake Work Window), GGS-3 (Giant Garter snake Monitoring), GGS-4 (Giant Garter snake Habitat Dewatering and Exclusion), GGS-5 (Avoid Giant Garter snake Entrapment), GGS-6 (Erosion Control Materials in Giant Garter snake Habitat), GGS-7 (Giant Garter snake Encounter Protocol), GGS-8 (Giant Garter snake Post-Construction Restoration), GGS-9 (Giant Garter snake Relocation Plan), and GGS-10 (Giant Garter snake Post-Construction Restoration).

Nesting Raptors and Migratory Birds including California black rail and Yellow-headed blackbird

IV-13. 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). These surveys can be conducted concurrently with surveys required under IV-5. The results of the preconstruction nesting bird survey shall be submitted to the City of Galt. If nests are not found during the survey, further measures shall not be required. 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. According to the U.S. Fish and Wildlife Service National Wetlands Inventory, while the project site does not contain any existing wetlands or other waters of the U.S. or State, a 0.25-acre freshwater emergent wetland is located to the north of the project site.[10] Because a final site plan has not yet been prepared for the proposed project, the exact disturbance area of the proposed project is not currently known. As such, although the wetlands are not on-site, the potential exists for buildout of the project site to disturb the existing wetlands. Therefore, the project has the potential to have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. Thus, a ***potentially significant*** impact could occur.

Mitigation Measure(s)

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

IV-14. Implement Mitigation Measure IV-1.

d. Existing development in the project vicinity includes rural residences and Simmerhorn Road to the north, and SR 99 to the west, all of which act as impediments to wildlife movement. Therefore, the project site does not support a substantial wildlife movement corridor. In addition, while aquatic features do not currently exist on-site, as discussed above, a wetland area is located adjacent to the project site-s northern boundary.

[10] U.S. Fish and Wildlife Service. *National Wetlands Inventory.* Available at: https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/. Accessed May 2022.

Nonetheless, Mitigation Measure IV-1 would minimize any impacts to the wetland on the project boundary. As such, 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, and a ***less-than-significant*** impact would occur.

e. The project site does not contain any trees. As such, the proposed project would not conflict with the City of Galt Tree Ordinance, and a ***no impact*** would occur related to conflicting with local policies or ordinances protecting biological resources.

f. The proposed project is 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. Applicable Avoidance and Minimization Measures for SSHCP covered species known to occur within the project region, have been included in Mitigation Measures IV-1 through IV-13 of this IS/MND. Additionally, the proposed project would be subject to pay all applicable development fees according to the sites land cover types.

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

The following is based primarily on a Cultural Resources Study prepared for the proposed project by Tom Origer & Associates.[11]

a. 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 of Galt is a culturally rich area with multiple historical and archaeological resources, including the Liberty Cemetery and Rae House Museum.[12]

As part of the Cultural Resources Study, a cultural resources records search was conducted at the North Coast Information Center (NCIC) of the California Historical Resources Information Center (CHRIS). In addition to the records search, other literature reviewed included survey reports, archaeological site records, historic maps, and listings of resources on the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), Historic Property Data File for Sacramento County, California Points of Historical Interest, California Historical Landmarks, and National Historic Landmarks.

To augment the review of documentation, an intensive field survey was completed by Tom Origer & Associates on May 19, 2022. Surface examination consisted of walking in zig-zagging 15-meter corridors and a hoe was used as needed to expose the ground surface.

Based on the results of the CHRIS records search, archival review, and field study, the Cultural Resources Study concluded that historical resources were not present on the project site. In addition, the project site is undeveloped and devoid of existing structures. Therefore, the proposed project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5, and a ***less-than-significant*** impact would occur.

b,c. Based on the CHRIS results, the Cultural Resources Report determined that the project site has very low potential to contain archeological resources. In addition, the field study did not identify any archeological resources on-site. However, Dry Creek, located

[11] Tom Origer & Associates. *Cultural Resources Study for the Housing Element Site 18 Project.* June 3, 2022.
[12] City of Galt. *Galt 2030 General Plan, Existing Conditions Report* [Table 9.1]. November 2005.

southwest of the project site, has experienced deposit of alluvium over time, which could contain buried pre-contact archaeological resources. Archaeological sites often occur along, or in proximity to, perennial waterways. Thus, given the site's proximity to Dry Creek, the potential exists for unknown buried archaeological sites to be discovered within the project site. If previously unknown resources are encountered during construction activities, the proposed project could cause a substantial adverse change in the significance of a unique archaeological resource pursuant to CEQA Guidelines Section 15064.5 and/or disturb human remains, including those interred outside of dedicated cemeteries, during construction. Therefore, impacts 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.

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. *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 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 (pursuant to §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 main forms of available energy supply are electricity, natural gas, and oil. A description of the relevant sections of the California Building Standards Code (CBSC), 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 is 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. 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 and a 30 percent reduction in energy consumption for non-residential structures. Energy reductions relative to previous Building Energy Efficiency Standards are 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 would continue to be subject to all other applicable portions of the 2019 Building Energy Efficiency Standards. It should be noted that due to timing of the proposed project, the project would be subject to the 2022 Building Energy Efficiency Standards, which will become effective on January 1, 2023. The 2022 Building Energy Efficiency Standards will include requirements that encourage efficient electric heat pumps, establish electric-ready requirements for new homes, expand solar photovoltaic and battery storage standards, and strengthen ventilation standards. Therefore, projects built under the 2022 Building Energy Efficiency Standards are expected to be more energy efficient than those built under the 2019 Standards.

Construction Energy Use

Construction of the proposed project 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., demolition, 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, rather than a single location. In addition, all construction equipment and operation thereof would be regulated pursuant to 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 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

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

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. It should be noted that CARB has prepared a draft 2022 Scoping Plan Update; however, the 2022 update has not yet been officially adopted. If the proposed project were to be constructed after the 2022 update is completed, the proposed project would be required to comply with the most recent version of the CARB Scoping Plan.

Based on the above, the temporary increase in energy use occurring during construction of the proposed project would not result in a significant increase in peak or base demands or require additional capacity from local or regional energy supplies. In addition, construction activities associated with the proposed project 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.

Operational Energy Use

Following implementation of the proposed project, SMUD and PG&E would provide electricity and natural gas to the project site. Energy use associated with operation of the proposed project would be typical of residential uses, requiring 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, the proposed project would result in transportation energy use associated with vehicle trips generated by the proposed single-family homes.

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 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 60 percent of total procurement by 2030. Thus, a portion of the energy consumed during operation of the proposed project would originate from renewable sources.

Furthermore, as discussed in Section VIII, Greenhouse Gas Emissions, of this IS/MND, implementation of Mitigation Measure VIII-1 would ensure the proposed project is consist with the sustainability measures listed in the City's Climate Action Plan (CAP), including, but not limited to, the following: zero net energy (ZNE) structures and on-site renewable energy generation, inclusion of all electric appliances, or the otherwise reduction of the amount of natural gas consumed on-site, and exceedance of the on-site renewable energy standards required by the applicable California Building Standards Code. Compliance with the sustainability measures included in the City's CAP would further help to ensure that the building energy use associated with the proposed project would not be wasteful, inefficient, or unnecessary.

With regard to transportation energy use, the proposed project would comply with all applicable regulations associated with vehicle efficiency and fuel economy. In addition, as discussed in Section XVII, Transportation, of this IS/MND, the City of Galt and surrounding areas provides residents with numerous public transportation options. Transit options include Dial-A-Ride, Highway 99 Express, Delta Route, and other modes of public transit. Transit would provide access to several grocery stores, restaurants, banks, and schools within close proximity to the project site. The site's access to public transit would reduce vehicle miles traveled (VMT) and, consequently, fuel consumption associated with the proposed project.

Conclusion

Based on the above, construction and operation of the proposed project would not 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-ii. The City of Galt's topography is relatively flat and Galt is not located within an Alquist-Priolo Earthquake Fault Zone nor is the City in the immediate vicinity of an active fault.[14] The nearest mapped fault to the project site is the Midland Fault and the nearest active fault is the Clayton-Marsh Creek-Greenville Fault, which is located over 40 miles southwest of the project site. According to the Galt 2030 General Plan EIR, ground shaking hazards 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.

While damage on the project site could occur in the event of a major seismic event, General Plan Policy SS-1.7 requires all new buildings be built in accordance with the seismic requirements of the CBSC.[16] 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,

[14] California Department of Conservation. *Fault Activity Map of California*. Available at: http://maps.conservation.ca.gov/cgs/fam/. Accessed August 2022.
[15] City of Galt. *City of Galt 2030 General Plan EIR*. [pg. 8-24]. April 2009.
[16] City of Galt. *City of Galt General Plan Policy Document*. [pg. SS-2]. April 2009.

but with some structural, as well as non-structural, damage. Although conformance with the CBSC does not guarantee 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 that the proposed structure would be survivable, allowing occupants to safely evacuate in the event of a major earthquake.

Because the project site is not located within an Alquist-Priolo Fault Zone and the proposed structures would be designed according to the CBSC, the proposed project would not expose people and structures 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 City of Galt's General Plan EIR concluded that the City of Galt Sphere of Influence (SOI) is considered to be at a low to moderate risk of hazard from liquefaction and subsidence. Due to the relatively flat topography of the City of Galt SOI, the City of Galt's General Plan EIR did not consider landslide to be a risk to new or existing development within the City. Consequently, existing or future development within the project site would not be subject to risk from landslides, either seismically induced or otherwise. The proposed project's potential effects related to liquefaction, lateral spreading, and subsidence/settlement, 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. According to the California Geologic Survey, the project site is not located within a designated seismic hazard zone for liquefaction.[17] The nearest liquefaction zone is located approximately 20 miles southwest of the project site. According to the United States Department of Agriculture's Web Soil Survey, the project site is underlain by San Joaquin silt loam.[18] Silt loams do not represent the type of unconsolidated soil that is typically subject to liquefaction. Furthermore, pursuant to Policy SS-2.1 of the City of Galt's General Plan, development within the project 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. Due to the low-likelihood that development within the project site would be subject to risks from liquefaction, implementation of the proposed project would not result in risks related to liquefaction, either seismically induced or otherwise.

Lateral Spreading

Lateral spreading is horizontal/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. The project site does not contain any open faces that would be considered susceptible to lateral spreading. In addition, as noted above, the

[17] California Geologic Survey. *Data Viewer.* Available at: https://maps.conservation.ca.gov/geologichazards/#dataviewer. Accessed August 2022.
[18] US Department of Agriculture. *Web Soil Survey*. Available at: https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx. Accessed August 2022.

development within 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 project is relatively 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 probability of subsidence occurring in the study area is considered a low to moderate hazard. Given that the proposed project would comply with General Plan Policy SS-1.7, requiring new buildings be built in accordance with the CBSC, and Policy SS-2.1, as discussed above, the potential for subsidence to pose a risk to the proposed development is relatively low.

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 project 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. Issues related to erosion and degradation of water quality during construction are discussed in Section X, Hydrology and Water Quality, of this IS/MND, under question 'a'. 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 can undergo significant volume change with changes in moisture content. Specifically, such soils shrink and harden when dried and expand and soften when wetted. 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. According to the City's General Plan EIR, expansive soils located within the City have been mixed with more granular soils during site excavation or buried beneath more granular soils during excavation operations to reduce the soil's overall expansiveness.[19] However, because a site-specific geotechnical study has not been prepared for the project site, the potential exists that expansive soils are located within the project site and pose a risk to any future development within the area.

Therefore, a ***potentially significant*** impact could occur related to being located on expansive soil, as defined in Table 18-1B of the Uniform Building Code, thereby creating substantial direct or indirect risks to life or property.

Mitigation Measure(s)

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

[19] City of Galt. *Galt General Plan Update 2030: Environmental Impact Report.* [pg. 10-17] July 2008.

VII-1. *Prior to issuance of a grading permit, the applicant/developer shall incorporate the recommendations of a design-level geotechnical report into project Improvement Plans for review and approval by the City Engineer. Should expansive or otherwise unstable soils be found within the project site, the design-level geotechnical report shall include measures necessary to ensure that such on-site conditions are fully mitigated. Methods of mitigating potential on-site soil expansive soils may include, but shall not be limited to, the following measures:*

- *Remove and replace potentially expansive soils; and/or*
- *Strengthen foundations (e.g., post-tensioned slab, reinforced mat or grid foundation, or other similar system) to resist excessive differential settlement associated with seismically-induced soil expansion.*

e. Although finalized plans do not currently exist for the proposed project's utility infrastructure, the proposed project is anticipated to connect to existing City sewer services. Thus, the construction or operation of septic tanks or other alternative wastewater disposal systems is not included as part of the project. Therefore, ***no impact*** regarding the capability of soil to adequately support the use of septic tanks or alternative wastewater disposal systems would occur.

f. The City's General Plan indicates that known paleontological resources could exist along the City's major waterways, especially the Cosumnes River, and along the Dry Creek corridor. Therefore, development allowed under the General Plan could result in the discovery and disturbance of previously unknown or undiscovered paleontological resources. The City's 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.

In addition, the City's General Plan does not note the existence of any unique geologic features within the City. Consequently, implementation of the proposed project would not be anticipated to have the potential to result in direct or indirect destruction of unique geologic features.

Although the proposed project would not have the potential to result in the destruction of unique geologic features, previously unknown paleontological resources could exist within the project site. Thus, ground-disturbing activity, such as grading, trenching, or excavating associated with implementation of the proposed project, could have the potential to disturb or destroy such resources. Therefore, 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 measure would reduce the above potential impact to a *less-than-significant* level.

VII-2. *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, 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.

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 adopted a CAP, which provides a jurisdiction-wide approach to the analysis of GHG emissions. The City's CAP includes Citywide measures intended to reduce emissions from existing sources, as well as measures aimed at reducing emissions from future sources related to development within the City.

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. 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/or transit infrastructure, pursuant to CAP Transportation Measures 1 and 2. Additionally, project construction would be required to include a percentage of construction equipment meeting the USEPA's Tier 4 standards. In addition to resulting in reduced particulate matter and NO_X emissions, use of Tier 4 engines consumes approximately five percent less fuel than standard construction equipment. Increased fuel efficiency and decreased total fuel consumption would directly reduce construction-related GHG emissions.[20] All construction equipment in operation would be reported to SMAQMD on a monthly basis. Furthermore, the Galt CAP sustainability checklist requires outdoor electrical outlets or infrastructure to support the use of all electric landscaping equipment. It should be noted that yard equipment has traditionally been fossil fueled. Electrically powered alternatives have recently become available to allow consumers to opt for non-polluting yard equipment. The CAPCOA

[20] Empire Cat. *Tier 4 Emissions Technology*. Available at http://www.empire-cat.com/Power_Systems/Emissions_Solutions/Tier_4_Technology.aspx. Accessed August 2022.

considers the use of electric yard equipment as a BMP.[21] Because individual homeowners cannot be required to use specific types of electric yard equipment, the GHG emissions reduction benefits of this measure are speculative. However, the existence of electrical outlets in outdoor areas of homes would encourage future home owners to use electric landscaping equipment in lieu of fossil-fueled yard equipment.

Pursuant to 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. Pursuant to the CBSC and City's Municipal Code, the proposed project would be required to include several sustainable design features, including the following:

- Outdoor landscaping must reduce outdoor water use through compliance with the California Department of Water Resources 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;
- Inclusion of high-performance attics and walls; and
- Installation 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, the proposed project would meet one of the requirements in Section 2 of the Galt CAP sustainability checklist. However, given that a site plan has not yet been prepared for the proposed project, and a sustainability checklist has not yet been completed, project compliance with the CAP requirements is uncertain at this time. Therefore, to ensure that the final design of the proposed project fulfills the requirements of the City of Galt's CAP, Mitigation Measures VIII-1 and VIII-2, as described below, are required.

Consequently, without implementation of Mitigation Measures VIII-1 and VIII-2, 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.

VIII-1. *Prior to the issuance of grading permits, the project applicant/developer shall complete a CAP Sustainability Checklist to ensure the project's consistency with the sustainability measures listed in the City's CAP, which shall be submitted to the City of Galt Community Development Department for review and approval. Applicable sustainability measures required for the proposed project may include, but not be limited to:*

- *The incorporation of on-site bicycle, pedestrian, and/or transit infrastructure;*

[21] California Air Pollution Control Officers Association. *Quantifying Greenhouse Gas Mitigation Measures* [pg. 391]. August 2010.

- *Traffic calming and congestion management measures for at least 50 percent of all on-site roadways and intersections;*
- *Electric Vehicle changing infrastructure;*
- *The inclusion of infrastructure supporting alternative transportation to school;*
- *The use of construction equipment that meets the City's mobile source emissions reductions requirements;*
- *Zero net energy (ZNE) structures and on-site renewable energy generation;*
- *The provision of adequate recycling and green waste facilities;*
- *Urban tree planting in compliance with the City's requirements; and/or*
- *The provision of outdoor electrical outlets or infrastructure to support all electric landscaping equipment*

In addition, the proposed project would be required to meet at least one additional Sustainable Design Option included in Section 2 of the CAP Sustainability Checklist. Sustainable Design Options include:

- *Reuse or redevelopment of an existing building or previously developed parcel;*
- *Being located in an urban area on a site that has either been previously developed or adjoins existing development on at least 75 percent of the site's perimeter;*
- *Inclusion of a mix of land uses;*
- *Permanent protection of high-quality farmland;*
- *Inclusion of all electric appliances, or the otherwise reduction of the amount of natural gas consumed on-site;*
- *Participation in a Transportation Management Association established by the City or other agencies;*
- *The purchase of carbon off-set credits or implementation of a carbon sequestration program sufficient to off-set 15 percent or more of the project's anticipated greenhouse gas emissions; and*
- *Exceedance of the on-site renewable energy standards required by the applicable California Building Standards Code.*

VIII-2. *In the event that project construction occurs after the year 2025:*

Prior to the start of construction activities, the project applicant shall submit a construction equipment inventory list to the City Engineer demonstrating compliance with USEPA 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.

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. Residential uses are not typically associated with the routine transport, use, disposal, or generation of substantial amounts of hazardous materials. On-site maintenance may involve the use common household cleaning products, fertilizers, and herbicides, 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 small 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. Therefore, the 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. Construction activities associated with the proposed project 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. Thus, construction of the proposed project would not 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.

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. However, upon development of the project, 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. Therefore, without proper soil testing, 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 measure would reduce the above potential impact to a *less-than-significant* level.

IX-1. *Prior to initiation of construction activities on the proposed project site, 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 (RSLs) 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.*

c. The project site is located approximately 0.28-mile from Galt High School, located to the west, across SR 99. Moreover, the project site has limited potential for the routine transport, use, or disposal of hazardous materials as discussed above in Questions 'a' & 'b'. The proposed residential uses would not result in reasonably foreseeable release of hazardous materials. Therefore, the proposed project would result in 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. The Cal-EPA has compiled a list of data resources that provide information regarding the facilities or sites identified as meeting the "Cortese List" requirements, pursuant to Government Code 65962.5. The components of the Cortese List include the Department of Toxic Substances Control (DTSC) Hazardous Waste and Substances Site List, the list of leaking underground storage tank (UST) sites from the SWRCB's GeoTracker database, the list of solid waste disposal sites identified by the SWRCB, and the list of active Cease and Desist Orders (CDO) and Cleanup and Abatement Orders (CAO) from the SWRCB. The project site is not included on the DTSC Hazardous Waste and

Substances Site List,[22] or the list of solid waste disposal sites.[23] In addition, the project site is not included on the list of leaking UST sites from the State Water Resources Control Board (SWRCB's) GeoTracker database, or the list of active CDO and CAO from the SWRCB. Thus, the proposed project would not create a significant hazard to the public or the environment, and a ***less-than-significant*** impact would occur.

e. The nearest airport to the project site is Bottimore Ranch Airport, located approximately 2.9 miles northeast 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. Although a final site plan has not yet been prepared, the proposed project would be required to comply with the City of Galt's standards for roadway design and access. As such, adequate emergency access would be provided to the project site with implementation of the proposed project. During construction of the proposed project, 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. Transportation-related improvements implemented as part of the proposed project would be designed pursuant to the City of Galt's existing standards for roadways and emergency access. Therefore, development of the project site would not be anticipated to interfere with an adopted emergency response plan, and a ***less-than-significant*** impact would occur.

g. Issues related to wildfire hazards are discussed 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.[24] However, grass fires can occur on uncultivated lands, particularly where there is native vegetation. Given that the project site is surrounded by residential areas, agricultural property, and cultivated land, wildland fire vulnerability is considered low. Based on the above, 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.

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22 Department of Toxic Substances Control. *Hazardous Waste and Substances Site List (Cortese).* Available at: https://www.envirostor.dtsc.ca.gov/public/. Accessed September 2022.

23 CalEPA. *Cortese List Data Resources*. Available at: https://calepa.ca.gov/sitecleanup/corteselist/. Accessed September 2022.

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

a. During the early stages of construction activities associated with the proposed project, topsoil would be exposed due to grading and excavation 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 excavation during construction, as well as development 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 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 more than one acre of land, and, thus, is subject to the relevant requirements within the aforementioned General Permit.

It should be noted that near-surface groundwater could be present within the project site. Should near-surface groundwater be present within the site, construction activities may require dewatering activities, which could result in the violation of discharge requirements.

Construction activity associated with the proposed project would be required to implement any applicable goals, policies and BMPs set forth by the above programs. Construction related 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. Compliance with the foregoing requirements is typically demonstrated through implementation of a Stormwater Pollution Prevention Plan (SWPPP). However, a SWPPP has not yet been prepared for the proposed project. Without preparation of a SWPPP, proper implementation of BMPs can not be ensured at this time, and the proposed project's construction activities could result in an increase in erosion, and consequently affect water quality.

Based on the above, compliance with the SWRCB standards and City's NPDES Permit would ensure that construction activities associated with the proposed project do not result in the degradation of water quality. However, without proper implementation of a SWPPP prepared for the proposed project and mitigation to ensure potential dewatering activities do not result in impacts to water quality, construction of the proposed development could violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Thus, a ***potentially significant*** impact would occur.

Mitigation Measure(s)

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

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.

X-2. If a site-specific geotechnical report required by Mitigation Measure VII-1 identifies a near-surface groundwater table within the project site, the project applicant shall obtain the appropriate NPDES dewatering general permit prior to commencement of dewatering activities. Should such a permit be required, the project applicant shall prepare a Dewatering Plan that includes measures sufficient to ensure that dewatering activity does not result in a violation of water quality standards. Such measures may include sediment detention basins or clarifiers sufficient to properly treat any dewatering runoff prior to discharge. The plan shall be reviewed and approved by the City Community Development Department.

b,e. Water supplies for the project site are supplied by the City of Galt. According to the City's 2020 Urban Water Management Plan (UWMP),[25] the City of Galt'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, on-going groundwater use, and the uncertainty of overdraft conditions, monitoring groundwater levels within the City has shown little change in depth to groundwater since 1961. The 2020 UWMP concludes that groundwater resources within the City are anticipated to be sufficient to meet future demand. Increases in demand for groundwater that occur with buildout of the City, including buildout of the project site, can be met through continued pumping from existing wells and the construction of new wells as needed.[26] The proposed project is not anticipated to require construction of a new well, and continued pumping from existing City of Galt wells is not anticipated to inhibit the use of groundwater by the City.

Although the proposed project involves a Rezone and General Plan Amendment, both the existing and the proposed zoning and land use designations are urban in nature. Although the proposed residential use would generate a higher water demand that the current commercial land use designation, as stated above, the 2020 UWMP concludes that groundwater resources within the City are anticipated to be sufficient to meet future demand. Consequently, given the relatively small nature of the proposed project, buildout of the project site with residential uses would not increase water demand beyond the City's available surplus water supply.

Based on the above, the proposed project would not result in increased use of groundwater supplies beyond what has been anticipated by the City and accounted for in the UWMP. 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. In addition, the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

ci-iii. The project site primarily consists of disturbed land, previously used for agricultural operations. Implementation of the proposed project would involve grading of the site and

[25] City of Galt. *2020 Urban Water Management Plan Update*. June 2021.
[26] *Ibid.*

the development of up to 240 multi-family residential units. The proposed uses are not considered substantial sources of pollutants during operations. However, the proposed development would increase the amount of impervious surfaces within the project site and alter the drainage pattern within the site. Considering the amount of impervious surfaces that would be developed within the site, the altering of on-site drainage patterns could increase the rate or amount of runoff on- and off-site.

The on-site drainage system would be designed to meet the requirements of Section 9 of the Sacramento County Improvement Standards as well as the draft Sacramento Region Stormwater Quality Design Manual. Sacramento County drainage requirements include the following:

- One-foot of freeboard to manholes and 0.5-foot freeboard to inlets during the design storm event;
- Pad elevations must be 1.2-foot above Base Flood Elevation;
- Ponding cannot exceed 12 inches above the lip of the gutter;
- Drainage must be conveyed in closed conduits for developments smaller than 160 acres; and
- No adverse impacts to upstream or downstream channels.

Sacramento County stormwater quality requirements include the following:

- 48-hour drawdown time;
- Depth of water quality volume in treatment basin not to exceed one foot; and
- Hydromodification requirements must be met.

A final drainage plan would be required to be prepared for the proposed project that would meet the requirements of Section 9 of the Sacramento County Improvement Standards as well as the draft Sacramento Region Stormwater Quality Design Manual. Without preparation of a final drainage plan, compliance with all relevant requirements cannot be ensured at this time.

Based on the above, the proposed project would be required to comply with all applicable regulations, would not involve uses associated with the generation or discharge of polluted water, and would be designed to adequately treat stormwater runoff from the site prior to discharge. However, without preparation of a final drainage plan, the proposed project could substantially alter drainage patterns within the project, which could result in substantial erosion, siltation, or contribution of polluted runoff. Thus, the proposed would result in a ***potentially significant*** impact.

Mitigation Measure(s)

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

X-3. *Implement Mitigation Measure X-1 and X-2.*

X-4. *Prior to issuance of grading permits, the developer shall submit a Final Drainage Plan to the City. The Final Drainage Plan shall identify permanent stormwater control measures to be implemented within the project site. The final plan shall include calculations demonstrating that post-project stormwater flows comply with the applicable provisions of Section 9 of the*

Sacramento County Improvement Standards as well as the draft Sacramento Region Stormwater Quality Design Manual. The Final Drainage Plan shall be submitted to the Public Works Department for review and approval.

civ. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) for the project site, the project site is located within an Area of Minimal Flood Hazard (Zone X).[27] The site is not classified as a Special Flood Hazard Area or otherwise located within a 100-year or 500-year floodplain. Therefore, the proposed project would not place housing within a 100-year flood hazard area, place within a 100-year floodplain structures that would impede or redirect flood flows, or expose people or structures to a significant risk of loss, injury or death involving flooding. Therefore, the proposed project would not impede or redirect flood flows and a ***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 existing and proposed structures, as the project site is not located adjacent to a large closed body of water. Based on the above, the proposed project would not pose a risk related to the release of pollutants due to project inundation due to flooding, tsunami, or seiche, and would be ***less-than-significant***.

[27] Federal Emergency Management Agency. *Flood Insurance Rate Map 06067C0468J.* Effective October 20, 2016.

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. The proposed project would involve a General Plan Amendment and Rezone of the 9.9-acre project site, and subsequent development of up to 240 multi-family residential units. The project site is bordered to the north by rural residences, and the planned Simmerhorn Ranch Project lies to the east. The site is bound by rural agricultural land to the north, south, east, and west. As such, an established community does not currently exist in the project vicinity. The proposed project would not result in a division of an established community, but would instead improve the connectivity of the project vicinity with other portions of the City of Galt, principally the area west of SR 99. As such, the proposed project would not physically divide an established community and a ***less-than-significant*** impact would occur.

b. The project site's General Plan designation is Commercial, and the project site is currently zoned HC. The proposed project would require the approval of a General Plan Amendment to High Density Residential and a Rezone to R4A. Despite the fact that the project would require a General Plan Amendment and Rezone, both the existing land use and zoning designations and the proposed land use and zoning designations are urban in nature, and therefore buildout of the project site has been generally anticipated in the General Plan EIR.

In addition, the proposed project would be required to comply with all applicable development standards established by Title 18 of the City's Municipal Code. The development standards include maximum lot coverage, building heights, and building setback requirements. Furthermore, 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, as well as Policy SS-2.1, which requires that the project site undergo a soils report in order to avoid liquefaction, and Policies HRE-4.1through HRE-4.4, which require compliance with procedures upon discovery of unique paleontological resources.

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.

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. Buildout of the City's General Plan has been previously analyzed in the City's General Plan EIR. The General Plan EIR determined that impacts to mineral resources would be less-than-significant. Although the proposed project would involve a General Plan Amendment and Rezone, both the existing and proposed land use and zoning designations would involve urban development, and thus would not result in any changes to the analysis provided within the General Plan EIR related to Mineral Resources. Additionally, the City of Galt is within Sacramento County's General Plan area, which analyzes mineral resources within the County. According to the Sacramento County General Plan the mineral zone closest to the City of Galt is located near New Hope Road. New Hope Road is located approximately 1.26 miles southwest of the project site. The project site itself is not known to contain any mineral resources, and, due to the lack of known resources on-site, the proposed project would not result in the loss of any known resource. Furthermore, mineral extraction activity on the project site would not be compatible with the existing uses within the site and in the vicinity. Therefore, a ***less-than-significant*** impact to mineral resources would occur.

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 following discussion is based primarily on a Noise Assessment prepared by Saxelby Acoustics for the Simmerhorn Ranch Project, which is located immediately east of the project site.[28]

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.
- 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. In the vicinity of the project site, sensitive land uses include existing single-family residential uses located 500 feet to the north of the project site.

[28] Saxelby Acoustics. *Simmerhorn Ranch.* January 9, 2020.

Existing Noise Environment

The existing noise environment in the project area is primarily defined traffic on Simmerhorn Road.

To quantify the existing ambient noise environment in the project vicinity, Saxelby Acoustics conducted three continuous (24-hour) noise level measurements and four short-term noise level measurements in the vicinity of the project site. Noise measurement locations are shown in Figure 3, and a summary of the noise level measurement survey results is provided in Table 5.

Table 5
Summary of Existing Background Noise Measurement Data

Site	Date	CNEL /L_{dn}	Average Measured Hourly Noise Levels (dBA)					
			Daytime (7 AM to 10 PM)			Nighttime (10 PM to 7 AM)		
			L_{eq}	L_{50}	L_{max}	L_{eq}	L_{50}	L_{max}
LT-1	04/24/19	62	58	45	73	55	53	65
LT-2	04/24/19	70	67	57	85	62	52	81
LT-3	04/24/19	68	66	56	86	60	53	80
ST-1	04/25/19	N/A	63	56	77	N/A	N/A	N/A
ST-2	04/25/19	N/A	63	47	81	N/A	N/A	N/A
ST-3	04/25/19	N/A	54	54	70	N/A	N/A	N/A
ST-4	04/25/19	N/A	63	48	79	N/A	N/A	N/A

Source: Saxelby Acoustics. 2020.

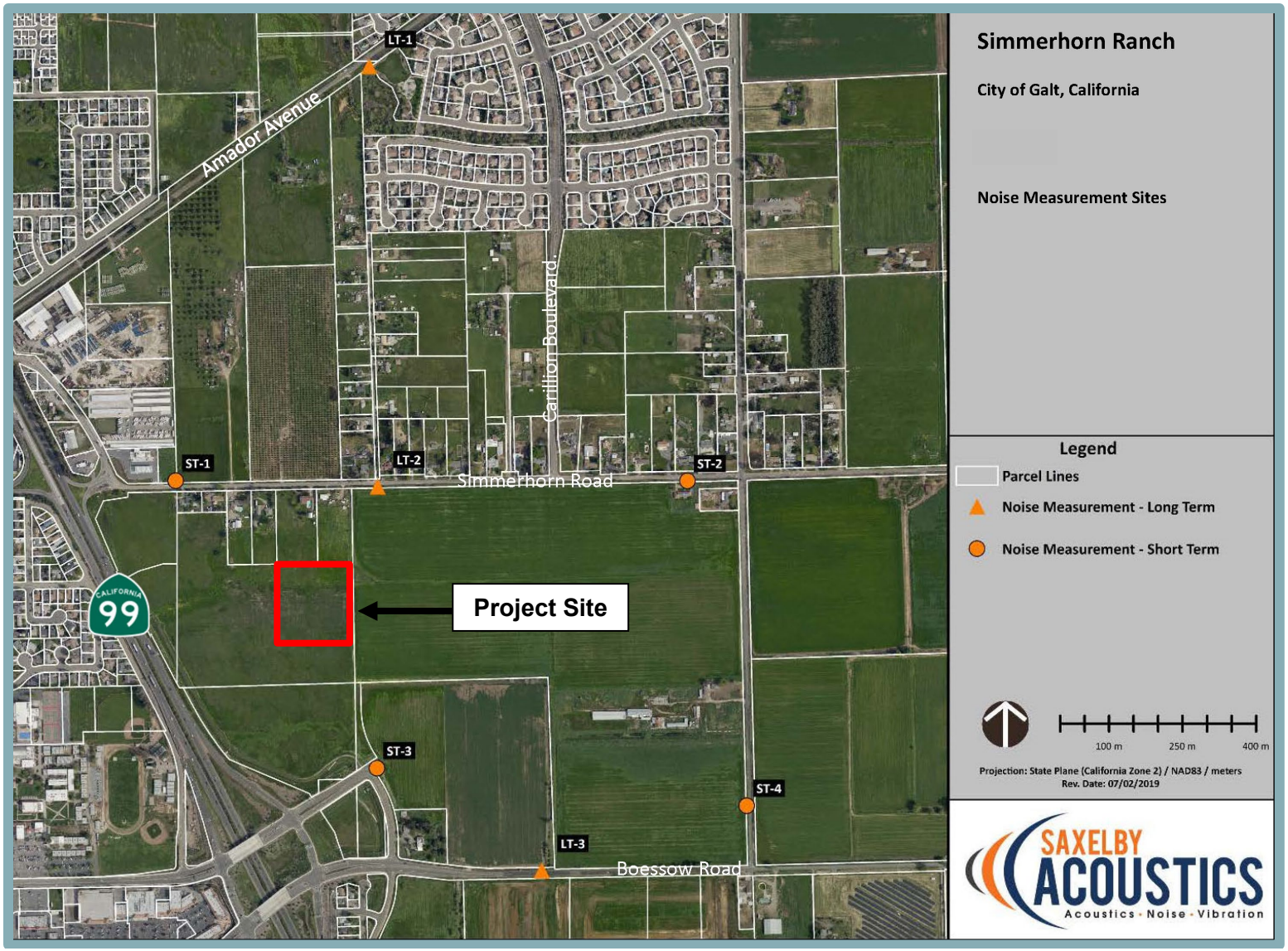
Standards of Significance

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 dBA or greater increase due to a project is considered significant;
- 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 dBA 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 dBA 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.

Figure 3
Noise Measurement Locations



Source: Saxelby Acoustics, 2020.

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.

Impact Analysis

The following sections provide an analysis of potential noise impacts associated with the proposed project.

Construction Noise

During construction of the proposed project, heavy-duty equipment would be used for demolition, grading, excavation, paving, and building construction, which would result in temporary noise level increases. 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 project site would vary depending on the proximity of construction activities to that point. Standard construction equipment, such as backhoes, dozers, and dump trucks would be used on-site. Table 7 shows the predicted construction noise levels for development of the proposed project.

Table 7
Construction Equipment Noise

Type of Equipment	Maximum Level, dB at 50 feet
Auger Drill Rig	84
Backhoe	78
Compactor	83
Compressor (air)	78
Concrete Saw	90
Dozer	82
Dump Truck	76
Excavator	81
Generator	81
Jackhammer	89
Pneumatic Tools	85

Source: Federal Highway Administration, Roadway Construction Noise Model User's Guide, January 2006.

Based on the table, activities involved in typical construction would generate maximum noise levels up to 90 dB at a distance of 50 feet. As one increases the distance between equipment, or increases separation of areas with simultaneous construction activity, dispersion and distance attenuation reduce the effects of combining separate noise sources. The noise levels from a source decrease at a rate of approximately six dB per every doubling of distance from the noise source. Based on a typical noise-attenuation rate of six dB per doubling distance, noise levels at 500 feet would be a maximum of 70

dB. Construction activities would be temporary in nature and are anticipated to occur during normal daytime hours. Noise would also be generated during the construction phase by increased truck traffic on area roadways. A project-generated noise source would be truck traffic associated with transport of heavy materials and equipment to and from the construction site. Noise increase from truck traffic related to the movement of material would be of short duration, and would likely occur primarily during daytime hours.

The City of Galt establishes permissible hours of construction in Section 8.40.060(E) and (F) of the Municipal Code. The ordinance restricts noise-producing construction activities to weekday hours between 6:00 AM and 8:00 PM Monday through Friday, and from 7:00 AM to 8:00 PM on Saturdays and Sundays. During the permissible hours, construction activities are conditionally exempt from the Noise Ordinance Standards established by Section 8.40.040(A) of the City's Municipal Code.

Although construction activities are temporary in nature and would likely occur during normal daytime working hours, construction-related noise could result in sleep interference at existing noise-sensitive land uses in the vicinity of the project if construction activities were to occur outside the normal daytime hours. Therefore, impacts resulting in the 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 could be considered significant.

Project Operational Noise

Operations of the proposed project would generate noise primarily associated with increased traffic on nearby roadways. The proposed project would include typical residential noise which would be compatible with the existing and anticipated residential uses in the project vicinity. Residential uses do not generate substantial noise. As a result, impact from project-generated operational noise would be considered less-than-significant. Transportation related noise at sensitive receptors is discussed in further detail below.

As further discussed in Section XVII, Transportation, of this IS/MND, the proposed project would result in an increase in vehicle trips on local roadways. Increased vehicle trips would result in increased noise levels from vehicle traffic along local roadways. The Galt 2030 General Plan EIR considers an increase of at least three dB to be a significant increase in traffic-related noise.

To examine the effect of project-generated traffic increases, traffic noise levels associated with the Simmerhorn Ranch Project were calculated for roadway segments in the project area using the FHWA model. Traffic noise levels were modeled under Existing and Background conditions with and without the Simmerhorn Ranch Project. As projected in the Noise Assessment, noise levels along Simmerhorn Road in the year 2040, including buildout of the Simmerhorn Ranch Project, would range from 61.4 to 62.9 dB. The increase in noise levels from the existing conditions to the 2040 conditions were determined to be a maximum of 0.1 dB. Therefore, noise levels associated with Simmerhorn Road were not anticipated to exceed the 65 dB threshold, even after buildout of the Simmerhorn Ranch Project.

The Simmerhorn Ranch Project included the development of 429 residential units, a park, and dedication of a school site for future development of an elementary school. Buildout of the Simmerhorn Ranch Project was projected to generate a total of 3,857 daily trips,

which was determined to result in an increase of 0.1 dB along Simmerhorn Road. The proposed project would include the construction of 240 multi-family residential units. Using the ITE Trip Generation Manual, the proposed project would generate an approximate 1,596 daily trips.[29] Because the proposed project is significantly smaller in scale than the Simmerhorn Ranch Project, the proposed project would not result in a traffic noise level increase greater than 3.0 dB. Therefore, a less-than-significant impact would occur related to traffic noise.

As discussed in Section III, Air Quality, of this IS/MND, impacts of the environment on a project (as opposed to impacts of a project on the environment) are beyond the scope of required CEQA review. While not a CEQA consideration, it should be noted that the project site is located approximately 550 feet east of SR 99. According to Figure N-2 in the Galt General Plan Update EIR, noise at the project site from traffic on SR 99 is anticipated to be between 60 and 65 L_{dn}. 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. As such, noise levels form SR 99 at the project site would be within acceptable levels.

Conclusion

Based on the above, operation of the proposed project would not result in the generation of a substantial permanent increase in ambient noise levels in the vicinity of the project site 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. Therefore, considering the potential for construction noise to occur in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, 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.

XIII-1. *Construction activities shall comply with the City of Galt Noise Ordinance and shall be limited to the hours set forth below:*

Monday-Friday	*6:00 AM to 8:00 PM*
Saturday and Sunday	*7:00 AM to 8:00 PM*

These 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.

XIII-2. *Construction activities shall adhere to the requirements of the City of Galt with respect to hours of operation, muffling of internal combustion engines, and other factors that affect construction noise generation and its effects on noise-sensitive land uses. Prior to issuance of grading permits, these criteria shall be included in the grading plan submitted by the*

[29] Institute of Transportation Engineers. *Trip Generation Manual, 9th Edition.* September 2017.

applicant/developer for the review and approval of the Public Works Department.

XII-3. During construction, the applicant/developer shall designate a disturbance coordinator and conspicuously post this person's number around the project site and in adjacent public spaces. The disturbance coordinator will receive all public complaints about construction noise disturbances and will be responsible for determining the cause of the complaint, and implement feasible measures to be taken to alleviate the problem. The disturbance coordinator shall report all complaints and corrective measures taken to the Community Development Director.

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. As with noise, vibration consists of an amplitude and frequency. A person's perception to the vibration depends on their individual sensitivity to vibration, as well as the amplitude and frequency of the source and the response of the system which is vibrating.

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. Table 8, which was developed by the California Department of Transportation (Caltrans), shows the vibration levels that would normally be required to result in damage to structures. As shown in the table, the threshold for architectural damage to structures is 0.20 in/sec PPV and continuous vibrations of 0.10 in/sec PPV, or greater, would likely cause annoyance to sensitive receptors.

The primary vibration-generating activities associated with the proposed project would occur during construction when activities such as grading, utilities placement, and parking lot construction occur. Table 9 shows the typical vibration levels produced by construction equipment at various distances. The most substantial source of groundborne vibrations associated with project construction would be the use of vibratory compactors.

With the exception of vibratory compactors, the Table 9 data indicate that construction vibration levels anticipated for the project are less than the 0.2 in/sec threshold at distance of 26 feet. The proposed project construction would occur at distances greater than 26 feet from the nearest single-family residential uses.

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 the Bottimore Ranch Airport, located approximately 2.9 miles northeast of the site. The site is not covered by an existing airport land use plan. Given that the project site is not located within two miles of a public or private airport, the proposed project would not expose people residing or working in the project area to excessive noise levels associated with airports. Thus, ***no impact*** would occur.

Table 8
Effects of Vibration on People and Buildings

PPV		Human Reaction	Effect on Buildings
mm/sec	in/sec		
0.15 to 0.30	0.006 to 0.019	Threshold of perception; possibility of intrusion	Vibrations unlikely to cause damage of any type
2.0	0.08	Vibrations readily perceptible	Recommended upper level of the vibration to which ruins and ancient monuments should be subjected
2.5	0.10	Level at which continuous vibrations begin to annoy people	Virtually no risk of "architectural" damage to normal buildings
5.0	0.20	Vibrations annoying to people in buildings (this agrees with the levels established for people standing on bridges and subjected to relative short periods of vibrations)	Threshold at which there is a risk of "architectural" damage to normal dwelling - houses with plastered walls and ceilings. Special types of finish such as lining of walls, flexible ceiling treatment, etc., would minimize "architectural" damage
10 to 15	0.4 to 0.6	Vibrations considered unpleasant by people subjected to continuous vibrations and unacceptable to some people walking on bridges	Vibrations at a greater level than normally expected from traffic, but would cause "architectural" damage and possibly minor structural damage

Source: Caltrans. Transportation Related Earthborne Vibrations. TAV-02-01-R9601. February 20, 2002.

Table 9
Vibration Levels for Various Construction Equipment

Type of Equipment	PPV at 25 feet (in/sec)	PPV at 50 feet (in/sec)
Large Bulldozer	0.089	0.031
Loaded Trucks	0.076	0.027
Small Bulldozer	0.003	0.001
Auger/drill Rigs	0.089	0.031
Jackhammer	0.035	0.012
Vibratory Hammer	0.070	0.025
Vibratory Compactor/roller	0.210 (less than 0.20 at 26 feet)	0.074

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Guidelines, May 2006.

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 a General Plan Amendment to redesignate the site as High Density Residential and a Rezone of the project site from HC to R4. In addition, the project site is anticipated to be developed with up to 240 residential units. Using the City of Galt average persons per household value of 3.27, the proposed project's addition of 240 high-density residential units would result in approximately 785 new residents.[30] The Department of Finance estimates the 2019 population of Galt, based on the 2010 Census, to be approximately 26,489.[31] Therefore, assuming all residents of the proposed project to be new to the City, the proposed project would represent only a three percent increase in total population. 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 evaluated throughout this IS/MND.

It should be noted that the project site is located adjacent to the planned Simmerhorn Ranch Project, which is also a residential development. As such, the proposed project would be served by the same utility infrastructure as the Simmerhorn Ranch Project, and therefore would not require an extension of major infrastructure. In addition, although the General Plan designates the site for commercial development, and the proposed project is residential in nature, urban development has been generally anticipated for the project site by the City. As a result, the buildout of the proposed project, and the subsequent population growth, has been generally anticipated in the City's General Plan. Consequently, the proposed project would not induce substantial unplanned population growth in an area, either directly or indirectly, and a ***less-than-significant*** impact would occur.

b. The project site is currently undeveloped and zoned for commercial use. Consequently, the proposed project would not result in the displacement of substantial numbers of people or the need to construct replacement housing. In addition, the proposed project would result in the construction of housing, which would add to the housing stock of the City. Therefore, impacts would be considered ***less than significant***.

[30] City of Galt. *Community Profile: City of Galt Demographic Overview.* Available at: https://www.cityofgalt.org/home/showpublisheddocument/28239/636686477078570000. Accessed October 2022.

[31] 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.

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 project site is located within the jurisdiction of 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. Fire Station 45 is located approximately 1.5 miles southwest of the project site, and Fire Station 46 is located approximately 1.7 miles to the north.

The increase in the overall demand on fire and police 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.

Additionally, any development within the project site would be required to adhere to Chapter 15.28, the Fire Code, of the City's Municipal Code, which requires that projects install a fire sprinkler system and adhere to all fire protection codes established by the CCSDFD. The above features would reduce the risk of fire at the project site, and, thus reduce potential for the project to increase demand. In addition, the project applicant would be required to pay all applicable fees, including a development impact fee and public safety fee. The payment of fees would ensure that adequate fire services would be available to serve the proposed project, 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. Thus, the proposed project would result in a ***less-than-significant*** impact.

b. The project site is located within the jurisdiction of the Galt Police Department (GPD). The GPD employs 38 sworn officers and 16 civilian staff, as well as several volunteers. The nearest GPD station to the project site is located at 455 Industrial Drive, approximately 1.2 miles northwest of the project site.

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 future developer of on-site housing would be required to pay all applicable fees, including a development impact fee and public safety fee. Given that the project site has been anticipated for urban development, the increase in police protection services associated with the project site has generally 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 proposed project includes the development of 240 high-density residential units. The project site is served by the Galt Joint Union Elementary School District (GJUESD) which operates middle and elementary schools within the City, as well as the Galt Joint Union High School District which operates the high schools. 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.[32] The proposed residences within the project site would be anticipated to generate new students. As shown in Table 10, the proposed project would generate approximately 206 total students.

Table 10
Proposed Project Student Generation

Grade	Number of Units	Students/Unit Rate[1]	Number of Students
K-5	240	0.48	115
6-8	240	0.17	41
9-12	240	0.21	50
Total	**240**	**0.86**	**206**

[1] Source: School Facility Needs Analysis, September 2011.

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." Such fees would be used in combination with State and other funds to construct new schools. The future developer of on-site housing would be required to pay development impact fees in order to fund new facilities. The payment of development impact fees would be sufficient to ensure adequate school capacity is provided and a ***less-than-significant*** impact would occur.

d. Using an average persons per household value of 3.27 per residential unit, the proposed project would generate a population of 785 persons. The 2030 Galt General Plan requires five acres of parkland per 1,000 residents; therefore, the project would be required to supply 3.27 acres of parkland. The proposed project does not currently include plans for an on-site park; however, the designation of parkland on-site is anticipated to occur during

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

preparation of final site plans for the proposed project. Additionally, although the proposed project would result in an increase in population within the City, the project would not result in a substantial loss of parkland. Designation of parkland within the project site and payment of impact fees at the time of development would be considered sufficient to ensure that adequate public parkland is provided for future residents, and a ***less-than-significant*** impact would occur.

e. The Galt 2030 General Plan anticipates increased demand for public facilities with growth in the City of Galt. The project site is designated for development. However, implementation of the proposed project would result in an increase in demand for public and governmental facilities through the development of new residences. Considering 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. 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. As discussed in Section XV, Public Services of this IS/MND, approximately 240 high-density residential units would be developed on the project site. Using an average persons per household of 3.27 per residential unit, the project population would be approximately 785 residents. As such, the proposed project would be required to dedicate at least 3.27 acres of parkland. Because a final site plan has not yet been prepared for the proposed project, the development of an adequate amount of dedicated parkland on-site cannot be ensured. As a result, the proposed project would be required to include parkland on-site and/or pay impact fees.

Payment of impact fees would ensure that adequate parkland is provided in the City, as well as ensure that existing recreation facilities would not experience impacts resulting from population growth. In addition, the proposed project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Therefore, a ***less-than-significant*** impact would occur.

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

a. The law has changed with respect to how transportation-related impacts may be addressed under CEQA. Traditionally, lead agencies used level of service (LOS) to assess the significance of such impacts, with greater levels of congestion considered to be more significant than lesser levels. Mitigation measures typically took the form of capacity-increasing improvements, which often had their own environmental impacts (e.g., biological resources). Depending on circumstances, and an agency's tolerance for congestion (e.g., as reflected in its general plan), LOS D, E, or F often represented significant environmental effects. In 2013, however, the Legislature passed legislation with the intention of ultimately doing away with LOS in most instances as a basis for environmental analysis under CEQA. Enacted as part of SB 743 (2013), PRC Section 21099, subdivision (b)(1), directed the Governor's Office of Planning and Research (OPR) to prepare, develop, and transmit to the Secretary of the Natural Resources Agency for certification and adoption proposed CEQA Guidelines addressing "criteria for determining the significance of transportation impacts of projects within transit priority areas. Those criteria shall promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses. In developing the criteria, [OPR] shall recommend potential metrics to measure transportation impacts that may include, but are not limited to, vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated. The office may also establish criteria for models used to analyze transportation impacts to ensure the models are accurate, reliable, and consistent with the intent of this section."

Subdivision (b)(2) of Section 21099 further provides that "[u]pon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion *shall not be considered a significant impact on the environment* pursuant to [CEQA], except in locations specifically identified in the guidelines, if any." (Italics added.)

Pursuant to SB 743, the Natural Resources Agency promulgated CEQA Guidelines Section 15064.3 in late 2018. It became effective in early 2019 and mandated Statewide by law on July 1, 2020. Subdivision (a) of that section provides that "[g]enerally, vehicle miles traveled is the most appropriate measure of transportation impacts. For the purposes of this section, 'vehicle miles traveled' refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and nonmotorized travel. Except as provided in subdivision

(b)(2) below (regarding roadway capacity), a project's effect on automobile delay shall not constitute a significant environmental impact."

LOS is still currently used by the City for purposes of determining consistency with adopted General Plan goals and policies related to LOS, but is no longer used for determining significant impacts under CEQA.

Please refer to Question "b" for a discussion of vehicle miles traveled (VMT).

Pedestrian, Bicycle, and Transit Facilities

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

Pedestrian and Bicycle Impacts

The City of Galt maintains three classes of commuter bikeways (Class I, Class II, and Class III). The City's Bicycle Transportation Plan proposes a number of new Class II bikeways to create a citywide trail system. As shown in Figure 10 of the City's Bicycle Transportation Plan, Class II bikeways are proposed north of the project site, along Simmerhorn Road, as well as along the project site's eastern border.[33] However, existing bicycle and pedestrian facilities are not present along the roadways in the project area.

A final site plan has not yet been prepared for the proposed project. Nonetheless, all internal roadways developed as part of the project would adhere to the applicable policies established by the General Plan, as well as the City's complete streets ordinance. As such, impacts related to pedestrian and bicycle facilities would not occur.

Transit Services and Facilities

The City and County jointly plan, manage, and fund local transit service which is guided by the regular update of the Short Range Transit Plan. The current contract transit operator, Community Transportation Agency, Inc., in the City of Galt operates South County Transit (SCT) Link. SCT provides fixed route SR 99 and Delta area service, as well as door-to-door Dial-A-Ride service in Galt. The nearest stop to the project site for both the SR 99 and Delta routes is at Galt City Hall, which is approximately 0.45 miles southwest of the project site. Given that the proposed project would follow all applicable policies established in the General Plan, existing transit services and facilities contain sufficient capacity to accommodate potential transit users at the proposed project.

Conclusion

Based on the above, the proposed project would not conflict with any existing or proposed roadway, pedestrian, bicycle, or transit facilities, and would be consistent with the City's adopted General Plan. Therefore, 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. Pursuant to Section 15064.3, analysis of VMT attributable to a project is the most appropriate measure of transportation impacts. However, the City has not yet established any standards or thresholds regarding VMT.

[33] City of Galt. *Bicycle Transportation Plan* [pg. 41]. January 2011.

Pursuant to 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 LOS times are an important consideration for traffic operations and management, the method of analysis does not fully describe 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.

As described previously in this IS/MND, the proposed project would include a General Plan Amendment and Rezone of the project site due to the City's adoption of an updated Housing Element in compliance with State Housing Element law (Government Code Section 65583). In accordance with the City's Housing Element, the City is now required to rezone a number of parcels throughout the City to high-density residential uses. The project site was specifically identified in the Housing Element as a potential site for very low income and low income residential development in order to meet the City's RHNA requirements for such housing.

A Draft Vehicle Miles Traveled Guidance (VMT Guidance) has been prepared for the City by GHD[34] which evaluated VMT impacts of buildout of the City's adopted Housing Element as a whole. The VMT Guidance evaluated the VMT generation of the entirety of the General Plan Housing Element area, including the project site, as well as the parcels to the west and south of the project site, which are zoned HC. According to the VMT Guidance, buildout of the commercial and residential aspects of the Housing Element would result in a net VMT impact that is less-than-significant because the locations identified for high-density residential development in Housing Element to meet RHNA needs are spread throughout the City, and located adjacent to commercial and other supportive uses. Because the proposed project was anticipated by the Housing Element and included in the VMT Guidance analysis, and due to the site's location adjacent to HC uses, buildout of the proposed project would overall be considered to not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b). In addition, should the future project be designed for low-income residents, it would automatically be assumed that the VMT impact would be less-than-significant, in accordance with OPR Guidance. Therefore, a ***less-than-significant*** impact would occur.

c,d. Although a site plan for the proposed project has not yet been prepared, access to the project site is proposed by way of a planned road extending south from Simmerhorn Road to run along the project site's eastern border. In accordance with all appropriate provisions within the City of Galt Municipal Code, intersections and street sections in the project vicinity, as well as within the project site itself, would be reviewed by the City of Galt and designed to provide adequate emergency access and comply with City of Galt standards. In addition, the proposed drive aisles within the on-site parking areas would be required be sufficiently sized to accommodate emergency vehicle access throughout the site.

Construction traffic associated with the proposed project 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 of the proposed subdivision. Given that increased construction traffic would be temporary in nature, construction traffic on

[34] GHD. *SB 743 – Draft Vehicle Miles Traveled (VMT) Guidance*. April 28, 2022.

local roadways would not result in significant hazards to the circulation system or restrict emergency vehicle access to the project site.

Therefore, the proposed 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. As part of the Cultural Resources Study prepared for the proposed project, Tom Origer & Associates determined that the site does not contain resources eligible for listing under the CRHR and the NRHP, or pursuant to Public Resources Code section 5020.1(k) or subdivision (c) of Public Resources Code Section 5024.1. As discussed in Section V, Cultural Resources, of this IS/MND, the Cultural Resources Study included a cultural records search of the CHRIS, which indicated that ethnographic sites are not located within one mile of the project site, and a very low potential exists for buried archaeological site indicators to occur in the project site area. In addition, an intensive field survey conducted on May 19, 2022, consisting of walking in zig-zagging 15-meter corridors and the use of a hoe to expose the ground surface, did not indicate the presence of any tribal cultural resources on-site.

However, a search of the California Native American Heritage Commission (NAHC) Sacred Lands File (SLF) pertaining to the project site's potential to contain undiscovered tribal cultural resources produced a positive result. Tom Origer & Associates subsequently sent letters to a list of tribes identified by the NAHC as potentially having knowledge of tribal cultural resources in the project area. Of the tribes contacted, one tribe, the Yocha Dehe Wintun Nation responded on May 23, 2022 to state that the project area is not within their aboriginal territory, and that they defer future correspondence to the Wilton Rancheria. Tom Origer & Associates did not receive any other responses.

In compliance with AB 52 (PRC Section 21080.3.1), project notification letters were distributed to the chairpersons of the Wilton Rancheria and the Torres Martinez Desert Cahuilla Indians on May 4, 2022. The Wilton Rancheria responded on June 10, 2022 requesting consultation. The City initiated consultation and provided project information to the tribe. Further response from the Wilton Rancheria has not been received to date. In addition, due to the fact that the proposed project would require a General Plan Amendment, SB 18 contact letters were distributed to the aforementioned tribes on May 4, 2022. A response has not yet been received.

Although field surveys of the project site did not identify any tribal cultural resources, the potential for such resources to occur within the project site remains. Consequently, development of the project site could result in adverse effects to previously unknown tribal cultural resources during 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.

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

a-c. Electricity, natural gas, telecommunications, water, and sanitary sewer services would be provided by way of new connections to existing infrastructure in the immediate project area. Brief discussions of the water, sewer service, stormwater drainage, electrical, natural gas, and telecommunications facilities that would serve the proposed project are included below.

Water

As previously mention under Section X, Hydrology and Water Quality, water service for the proposed project would be provided by the City by way of new connections and extensions to existing water lines.

According to the City's 2020 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.[35] The Cosumnes Subbasin is managed through the south Basin Groundwater Management plan which was adopted in 2011. According to the 2020 UWMP, 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.

According to the 2020 UWMP, the estimated baseline average per capita per day (gpcd) water demand between the years 2000 and 2009 was approximately 221 gallons per day

[35] City of Galt. *2020 Urban Water Management Plan Update*. June 2021.

per capita. The 2020 water demand target for the City of Galt is approximately 177 gpcd. According to the 2020 UWMP, the City can supply all of the water demands with groundwater from the Cosumnes Subbasin through the year 2045. Furthermore, the City is projected to have sufficient water supplies to meet projected water needs through 2045 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 2045 population of 35,758.[36] Given that the proposed project includes the development of up to 240 high-density residential units, the City of Galt's estimated current local population of 26,489 would increase by 785 residents, assuming the City of Galt's average household size of 3.27 persons per household, for a total current population of 27,274. Such an increase in population is well within the City of Galt's anticipated population growth, and, thus, within the City's available water supply.

Stormwater Systems

As discussed in Section X, Hydrology and Water Quality, stormwater draining off impervious surfaces such as roofs, parking areas, and drive aisles within the project site would be captured and treated using a stormwater treatment system that would be design to comply with Sacramento County standards for hydromodification and stormwater quality. Furthermore, Mitigation Measure X-1 would ensure that the project applicant comply with the NPDES general construction permit requirements. Consequently, implementation of the proposed project would include provision of adequate on-site infrastructure, and the existing off-site infrastructure would be sufficient to meet the demand from the project.

Wastewater Treatment

Although specific designs for the project site do not currently exist, sewer service is anticipated to be provided to the project site by construction of on-site infrastructure to connect the project site to the City's sewer system.

The City of Galt's current wastewater treatment collection system 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 approximately 2.6 miles northwest of the project site. The WWTP has a capacity of 3.0 million gallons per day (mgd) and is currently operating at 2.0 mgd.[37] Thus, the WWTP has a remaining capacity of approximately 1.0 mgd. According to the City of Galt Public Works Department, the average per capita flow is 100 gpcd.[38] Based on the average per capita flow rate, operation of the proposed project would contribute a total wastewater generation of approximately 75,800 gallons per day (0.075 mgd). Therefore, the WWTP has adequate remaining capacity to accommodate the increase of wastewater flows associated with the proposed project.

It should further be noted that, although the proposed project includes a General Plan Amendment and Rezone, buildout of the site with urban development was generally

[36] City of Galt. *2020 Urban Water Management Plan Update* [pg. 14]. June 2021.
[37] City of Galt. *Wastewater Treatment Plant.* Available at: https://www.cityofgalt.org/government/public-works-department/utilities-division/wastewater. Accessed August 2022.
[38] *Ibid.*

anticipated in the City's General Plan. Thus, increased wastewater flows associated with the project site have been generally anticipated within the City's General Plan and wastewater related analyses, such as the City's Sanitary Sewer Management Plan and the City's Wastewater Treatment Plant Facilities Master Plan.

Other Utilities

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. Telecommunications utilities would be provided by way of connections to existing infrastructure located within the immediate project vicinity. The proposed project would not require major upgrades to, or extension of, existing infrastructure. Thus, impacts to electricity, natural gas, and telecommunications infrastructure would be less than significant.

Conclusion

Considering the above, sufficient utility infrastructure exists in the project vicinity to serve the proposed project. Furthermore, increased demand for water, sewer, and other utilities resulting from the proposed project can be accommodating by the City's existing utility capacity. 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.

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.[39]

Although the proposed project includes a General Plan Amendment and Rezone, given the site's existing land use and zoning designations, development of the project site with urban uses has generally been anticipated by the City. Thus, potential impacts associated with increased solid waste generation due to development of the project site have been generally analyzed in the City's General Plan EIR.

Because of the Sacramento County Landfill remaining capacity, construction and operation of the proposed project would not result in increased solid waste in excess of the Sacramento County Landfill capacity. 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.

[39] 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/SolidWaste/SiteActivity/Details/2070?siteID=2507. Accessed August 2022.

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. Therefore, 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 Very High Fire Hazard Severity Zone.[40] The nearest Very High Fire Hazard Severity Zone is located approximately seven miles east of the project site. Therefore, the proposed project would not be subject to risks related to wildfires and a ***less-than-significant*** impact would occur.

[40] 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 Initial Study, while a limited potential exists for special-status plant and wildlife species to occur on-site, Mitigation Measures IV-1 and IV-13 would ensure that any impacts related to special-status species would be reduced to a less-than-significant level. The project site is predominantly undeveloped, has been previously disturbed, and intensive site surveys have determined that the site does not contain any known historic or prehistoric resources. Thus, implementation of the proposed project is not anticipated to have the potential to result in impacts related to historic or prehistoric resources. Nevertheless, Mitigation Measures V-1 and V-2 would ensure that in the event that historic or prehistoric resources are discovered within the project site, such resources would be protected in compliance with the requirements of CEQA.

Considering the above, the proposed project would not degrade the quality of the environment, substantially reduce or impact the habitat of 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. However, as demonstrated in this IS/MND, all potential environmental impacts that could occur as a result of project implementation would be reduced to a less-than-significant level through compliance with the mitigation measures included in this IS/MND, as well as applicable General Plan policies, Municipal Code standards, and other applicable local and State regulations. 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, other applicable local and State regulations, and mitigation measures included herein. In addition, as discussed in Section III, Air Quality, Section IX, Hazards and Hazardous Materials, and Section XIII, Noise, of this IS/MND, the proposed project would not cause substantial effects to human beings substantially beyond the background levels for such effects, including effects related to exposure to air pollutants, hazardous materials, traffic, and noise. Therefore, the proposed project's impact would be ***less than significant***.

APPENDIX A

AIR QUALITY AND GHG MODELING RESULTS

Housing Element Site 18 Project Detailed Report

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1.1. Basic Project Information

Data Field	Value
Project Name	Housing Element Site 18 Project
Lead Agency	City of Galt
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.70
Precipitation (days)	36.0
Location	38.25962451761902, -121.29301890617808
County	Sacramento
City	Galt
Air District	Sacramento Metropolitan AQMD
Air Basin	Sacramento Valley
TAZ	742
EDFZ	13
Electric Utility	Sacramento Municipal Utility District
Gas Utility	Pacific Gas & Electric

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Apartments Mid Rise	240	Dwelling Unit	9.90	230,400	155,945	—	672	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.79	11.8	39.8	36.7	0.05	1.81	19.8	21.6	1.66	10.1	11.8	—	5,746	5,746	0.26	0.22	12.6	5,830
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.71	11.7	15.4	25.5	0.03	0.60	2.29	2.89	0.55	0.54	1.10	—	5,469	5,469	0.21	0.22	0.33	5,540
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.08	4.30	6.89	9.90	0.01	0.29	1.57	1.86	0.27	0.62	0.89	—	1,956	1,956	0.09	0.07	1.79	1,980
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.20	0.79	1.26	1.81	< 0.005	0.05	0.29	0.34	0.05	0.11	0.16	—	324	324	0.02	0.01	0.30	328

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	4.79	11.8	39.8	36.7	0.05	1.81	19.8	21.6	1.66	10.1	11.8	—	5,746	5,746	0.26	0.22	12.6	5,830
2024	2.68	11.7	14.2	28.2	0.03	0.54	2.29	2.83	0.50	0.54	1.04	—	5,689	5,689	0.26	0.21	11.8	5,771

Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	2.71	11.7	15.4	25.5	0.03	0.60	2.29	2.89	0.55	0.54	1.10	—	5,469	5,469	0.21	0.22	0.33	5,540
2024	2.59	11.6	14.6	24.7	0.03	0.54	2.29	2.83	0.50	0.54	1.04	—	5,419	5,419	0.21	0.21	0.31	5,488
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	1.08	3.30	6.89	9.90	0.01	0.29	1.57	1.86	0.27	0.62	0.89	—	1,956	1,956	0.09	0.07	1.56	1,980
2024	0.91	4.30	5.04	8.75	0.01	0.19	0.79	0.98	0.17	0.19	0.36	—	1,921	1,921	0.07	0.07	1.79	1,947
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	0.20	0.60	1.26	1.81	< 0.005	0.05	0.29	0.34	0.05	0.11	0.16	—	324	324	0.02	0.01	0.26	328
2024	0.17	0.79	0.92	1.60	< 0.005	0.03	0.14	0.18	0.03	0.03	0.07	—	318	318	0.01	0.01	0.30	322

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	9.46	14.0	9.74	99.0	0.19	0.21	5.78	5.99	0.20	1.03	1.24	52.2	20,710	20,762	4.33	0.77	76.5	21,176
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	7.49	12.1	11.2	68.9	0.17	0.21	5.78	5.99	0.20	1.03	1.23	52.2	19,043	19,096	4.40	0.84	3.59	19,460
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	8.00	12.6	10.2	75.1	0.17	0.20	5.50	5.70	0.20	0.98	1.18	52.2	18,551	18,604	4.32	0.77	32.4	18,974
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.46	2.31	1.85	13.7	0.03	0.04	1.00	1.04	0.04	0.18	0.21	8.65	3,071	3,080	0.72	0.13	5.36	3,141

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	8.06	7.23	8.80	85.1	0.18	0.14	5.78	5.92	0.13	1.03	1.16	—	18,606	18,606	0.72	0.72	74.9	18,914
Area	1.31	6.77	0.14	13.6	< 0.005	0.01	—	0.01	0.01	—	0.01	0.00	36.4	36.4	< 0.005	< 0.005	—	36.5
Energy	0.09	0.05	0.81	0.34	0.01	0.07	—	0.07	0.07	—	0.07	—	2,044	2,044	0.13	0.01	—	2,049
Water	—	—	—	—	—	—	—	—	—	—	—	18.1	23.2	41.3	0.06	0.04	—	54.7
Waste	—	—	—	—	—	—	—	—	—	—	—	34.2	0.00	34.2	3.41	0.00	—	120
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.65	1.65
Total	9.46	14.0	9.74	99.0	0.19	0.21	5.78	5.99	0.20	1.03	1.24	52.2	20,710	20,762	4.33	0.77	76.5	21,176
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	7.39	6.55	10.4	68.6	0.17	0.14	5.78	5.92	0.13	1.03	1.16	—	16,976	16,976	0.79	0.80	1.94	17,235
Area	0.00	5.52	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Energy	0.09	0.05	0.81	0.34	0.01	0.07	—	0.07	0.07	—	0.07	—	2,044	2,044	0.13	0.01	—	2,049
Water	—	—	—	—	—	—	—	—	—	—	—	18.1	23.2	41.3	0.06	0.04	—	54.7
Waste	—	—	—	—	—	—	—	—	—	—	—	34.2	0.00	34.2	3.41	0.00	—	120
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.65	1.65
Total	7.49	12.1	11.2	68.9	0.17	0.21	5.78	5.99	0.20	1.03	1.23	52.2	19,043	19,096	4.40	0.84	3.59	19,460
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	7.00	6.21	9.25	65.5	0.16	0.13	5.50	5.63	0.12	0.98	1.11	—	16,459	16,459	0.71	0.72	30.7	16,723
Area	0.90	6.38	0.09	9.29	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	24.9	24.9	< 0.005	< 0.005	—	25.0
Energy	0.09	0.05	0.81	0.34	0.01	0.07	—	0.07	0.07	—	0.07	—	2,044	2,044	0.13	0.01	—	2,049
Water	—	—	—	—	—	—	—	—	—	—	—	18.1	23.2	41.3	0.06	0.04	—	54.7

Waste	—	—	—	—	—	—	—	—	—	—	—	34.2	0.00	34.2	3.41	0.00	—	120
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.65	1.65
Total	8.00	12.6	10.2	75.1	0.17	0.20	5.50	5.70	0.20	0.98	1.18	52.2	18,551	18,604	4.32	0.77	32.4	18,974
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.28	1.13	1.69	11.9	0.03	0.02	1.00	1.03	0.02	0.18	0.20	—	2,725	2,725	0.12	0.12	5.09	2,769
Area	0.16	1.16	0.02	1.70	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	4.13	4.13	< 0.005	< 0.005	—	4.14
Energy	0.02	0.01	0.15	0.06	< 0.005	0.01	—	0.01	0.01	—	0.01	—	338	338	0.02	< 0.005	—	339
Water	—	—	—	—	—	—	—	—	—	—	—	2.99	3.85	6.84	0.01	0.01	—	9.06
Waste	—	—	—	—	—	—	—	—	—	—	—	5.66	0.00	5.66	0.57	0.00	—	19.8
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.27	0.27
Total	1.46	2.31	1.85	13.7	0.03	0.04	1.00	1.04	0.04	0.18	0.21	8.65	3,071	3,080	0.72	0.13	5.36	3,141

3. Construction Emissions Details

3.1. Site Preparation (2023) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	4.70	3.95	39.7	35.5	0.05	1.81	—	1.81	1.66	—	1.66	—	5,295	5,295	0.21	0.04	—	5,314
Dust From Material Movement	—	—	—	—	—	—	19.7	19.7	—	10.1	10.1	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.13	0.11	1.09	0.97	< 0.005	0.05	—	0.05	0.05	—	0.05	—	145	145	0.01	< 0.005	—	146
Dust From Material Movement	—	—	—	—	—	—	0.54	0.54	—	0.28	0.28	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.20	0.18	< 0.005	0.01	—	0.01	0.01	—	0.01	—	24.0	24.0	< 0.005	< 0.005	—	24.1
Dust From Material Movement	—	—	—	—	—	—	0.10	0.10	—	0.05	0.05	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.08	0.06	1.22	0.00	0.00	0.01	0.01	0.00	0.00	0.00	—	206	206	0.01	0.01	0.90	210
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	< 0.005	< 0.005	0.00	0.00	0.00	—	5.15	5.15	< 0.005	< 0.005	0.01	5.22
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	0.00	0.00	—	0.85	0.85	< 0.005	< 0.005	< 0.005	0.86
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Grading (2023) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.43	2.04	20.0	19.7	0.03	0.94	—	0.94	0.87	—	0.87	—	2,958	2,958	0.12	0.02	—	2,968
Dust From Material Movement	—	—	—	—	—	—	7.08	7.08	—	3.42	3.42	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.13	0.11	1.09	1.08	< 0.005	0.05	—	0.05	0.05	—	0.05	—	162	162	0.01	< 0.005	—	163

Dust From Material Movement	—	—	—	—	—	—	0.39	0.39	—	0.19	0.19	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.20	0.20	< 0.005	0.01	—	0.01	0.01	—	0.01	—	26.8	26.8	< 0.005	< 0.005	—	26.9
Dust From Material Movement	—	—	—	—	—	—	0.07	0.07	—	0.03	0.03	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.05	1.05	0.00	0.00	0.01	0.01	0.00	0.00	0.00	—	177	177	0.01	0.01	0.77	180
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	< 0.005	< 0.005	0.00	0.00	0.00	—	8.83	8.83	< 0.005	< 0.005	0.02	8.95
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	0.00	0.00	—	1.46	1.46	< 0.005	< 0.005	< 0.005	1.48
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Building Construction (2023) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.50	1.26	11.8	13.2	0.02	0.55	—	0.55	0.51	—	0.51	—	2,397	2,397	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.50	1.26	11.8	13.2	0.02	0.55	—	0.55	0.51	—	0.51	—	2,397	2,397	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.42	0.35	3.33	3.71	0.01	0.16	—	0.16	0.14	—	0.14	—	676	676	0.03	0.01	—	678
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.08	0.06	0.61	0.68	< 0.005	0.03	—	0.03	0.03	—	0.03	—	112	112	< 0.005	< 0.005	—	112
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.92	0.79	0.63	12.1	0.00	0.00	0.11	0.11	0.00	0.00	0.00	—	2,038	2,038	0.09	0.07	8.88	2,070
Vendor	0.09	0.03	1.53	0.54	< 0.005	0.01	0.04	0.06	0.01	0.01	0.03	—	769	769	0.05	0.11	1.94	807
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.78	0.71	0.82	8.89	0.00	0.00	0.11	0.11	0.00	0.00	0.00	—	1,808	1,808	0.05	0.07	0.23	1,830
Vendor	0.09	0.03	1.64	0.56	< 0.005	0.01	0.04	0.06	0.01	0.01	0.03	—	769	769	0.05	0.11	0.05	804
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.22	0.20	0.20	2.56	0.00	0.00	0.03	0.03	0.00	0.00	0.00	—	523	523	0.03	0.02	1.08	530
Vendor	0.03	0.01	0.45	0.15	< 0.005	< 0.005	0.01	0.02	< 0.005	< 0.005	0.01	—	217	217	0.02	0.03	0.24	227
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.04	0.47	0.00	0.00	0.01	0.01	0.00	0.00	0.00	—	86.6	86.6	< 0.005	< 0.005	0.18	87.8
Vendor	< 0.005	< 0.005	0.08	0.03	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	35.9	35.9	< 0.005	0.01	0.04	37.6
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Building Construction (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	1.44	1.20	11.2	13.1	0.02	0.50	—	0.50	0.46	—	0.46	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.44	1.20	11.2	13.1	0.02	0.50	—	0.50	0.46	—	0.46	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.50	0.42	3.91	4.57	0.01	0.17	—	0.17	0.16	—	0.16	—	835	835	0.03	0.01	—	838
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09	0.08	0.71	0.83	< 0.005	0.03	—	0.03	0.03	—	0.03	—	138	138	0.01	< 0.005	—	139
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.83	0.76	0.57	11.2	0.00	0.00	0.11	0.11	0.00	0.00	0.00	—	2,001	2,001	0.08	0.07	8.18	2,032
Vendor	0.09	0.03	1.44	0.52	< 0.005	0.01	0.04	0.06	0.01	0.01	0.03	—	757	757	0.05	0.11	1.94	793
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.75	0.68	0.76	8.24	0.00	0.00	0.11	0.11	0.00	0.00	0.00	—	1,776	1,776	0.05	0.07	0.21	1,798

Vendor	0.09	0.03	1.54	0.53	< 0.005	0.01	0.04	0.06	0.01	0.01	0.03	—	756	756	0.05	0.11	0.05	790
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.26	0.24	0.22	2.94	0.00	0.00	0.04	0.04	0.00	0.00	0.00	—	635	635	0.01	0.02	1.23	644
Vendor	0.03	0.01	0.53	0.18	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	264	264	0.02	0.04	0.29	276
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.04	0.04	0.54	0.00	0.00	0.01	0.01	0.00	0.00	0.00	—	105	105	< 0.005	< 0.005	0.20	107
Vendor	0.01	< 0.005	0.10	0.03	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	43.6	43.6	< 0.005	0.01	0.05	45.6
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Paving (2023) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.04	0.88	8.06	10.0	0.01	0.41	—	0.41	0.38	—	0.38	—	1,512	1,512	0.06	0.01	—	1,517
Paving	—	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.06	0.05	0.44	0.55	< 0.005	0.02	—	0.02	0.02	—	0.02	—	82.8	82.8	< 0.005	< 0.005	—	83.1
Paving	—	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.08	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13.7	13.7	< 0.005	< 0.005	—	13.8
Paving	—	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.05	1.05	0.00	0.00	0.01	0.01	0.00	0.00	0.00	—	177	177	0.01	0.01	0.77	180
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	< 0.005	< 0.005	0.00	0.00	0.00	—	8.83	8.83	< 0.005	< 0.005	0.02	8.95
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	0.00	0.00	—	1.46	1.46	< 0.005	< 0.005	< 0.005	1.48
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Architectural Coating (2023) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.18	0.15	0.93	1.15	< 0.005	0.04	—	0.04	0.03	—	0.03	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	—	9.40	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.18	0.15	0.93	1.15	< 0.005	0.04	—	0.04	0.03	—	0.03	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	—	9.40	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.24	0.29	< 0.005	0.01	—	0.01	0.01	—	0.01	—	34.0	34.0	< 0.005	< 0.005	—	34.1
Architectural Coatings	—	2.39	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.04	0.05	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	5.62	5.62	< 0.005	< 0.005	—	5.64
Architectural Coatings	—	0.44	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.18	0.16	0.13	2.41	0.00	0.00	0.02	0.02	0.00	0.00	0.00	—	408	408	0.02	0.01	1.78	414
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.16	0.14	0.16	1.78	0.00	0.00	0.02	0.02	0.00	0.00	0.00	—	362	362	0.01	0.01	0.05	366
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.04	0.46	0.00	0.00	0.01	0.01	0.00	0.00	0.00	—	94.4	94.4	< 0.005	< 0.005	0.20	95.8
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.08	0.00	0.00	< 0.005	< 0.005	0.00	0.00	0.00	—	15.6	15.6	< 0.005	< 0.005	0.03	15.9
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.13. Architectural Coating (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.17	0.14	0.91	1.15	< 0.005	0.03	—	0.03	0.03	—	0.03	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	—	9.40	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.17	0.14	0.91	1.15	< 0.005	0.03	—	0.03	0.03	—	0.03	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	—	9.40	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.05	0.34	0.43	< 0.005	0.01	—	0.01	0.01	—	0.01	—	50.2	50.2	< 0.005	< 0.005	—	50.3
Architectural Coatings	—	3.53	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.06	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.31	8.31	< 0.005	< 0.005	—	8.33
Architectural Coatings	—	0.64	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.17	0.15	0.11	2.24	0.00	0.00	0.02	0.02	0.00	0.00	0.00	—	400	400	0.02	0.01	1.64	406
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.15	0.14	0.15	1.65	0.00	0.00	0.02	0.02	0.00	0.00	0.00	—	355	355	0.01	0.01	0.04	360
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.05	0.63	0.00	0.00	0.01	0.01	0.00	0.00	0.00	—	137	137	< 0.005	0.01	0.27	139
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.12	0.00	0.00	< 0.005	< 0.005	0.00	0.00	0.00	—	22.7	22.7	< 0.005	< 0.005	0.04	23.0
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	8.06	7.23	8.80	85.1	0.18	0.14	0.98	1.12	0.13	0.31	0.44	—	18,606	18,606	0.72	0.72	74.9	18,914
Total	8.06	7.23	8.80	85.1	0.18	0.14	0.98	1.12	0.13	0.31	0.44	—	18,606	18,606	0.72	0.72	74.9	18,914
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	7.39	6.55	10.4	68.6	0.17	0.14	0.98	1.12	0.13	0.31	0.44	—	16,976	16,976	0.79	0.80	1.94	17,235
Total	7.39	6.55	10.4	68.6	0.17	0.14	0.98	1.12	0.13	0.31	0.44	—	16,976	16,976	0.79	0.80	1.94	17,235
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	1.28	1.13	1.69	11.9	0.03	0.02	0.17	0.19	0.02	0.05	0.08	—	2,725	2,725	0.12	0.12	5.09	2,769
Total	1.28	1.13	1.69	11.9	0.03	0.02	0.17	0.19	0.02	0.05	0.08	—	2,725	2,725	0.12	0.12	5.09	2,769

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	1,016	1,016	0.04	0.01	—	1,018
Total	—	—	—	—	—	—	—	—	—	—	—	—	1,016	1,016	0.04	0.01	—	1,018
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	1,016	1,016	0.04	0.01	—	1,018
Total	—	—	—	—	—	—	—	—	—	—	—	—	1,016	1,016	0.04	0.01	—	1,018
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	168	168	0.01	< 0.005	—	169
Total	—	—	—	—	—	—	—	—	—	—	—	—	168	168	0.01	< 0.005	—	169

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.09	0.05	0.81	0.34	0.01	0.07	—	0.07	0.07	—	0.07	—	1,028	1,028	0.09	< 0.005	—	1,031

Total	0.09	0.05	0.81	0.34	0.01	0.07	—	0.07	0.07	—	0.07	—	1,028	1,028	0.09	< 0.005	—	1,031
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.09	0.05	0.81	0.34	0.01	0.07	—	0.07	0.07	—	0.07	—	1,028	1,028	0.09	< 0.005	—	1,031
Total	0.09	0.05	0.81	0.34	0.01	0.07	—	0.07	0.07	—	0.07	—	1,028	1,028	0.09	< 0.005	—	1,031
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.02	0.01	0.15	0.06	< 0.005	0.01	—	0.01	0.01	—	0.01	—	170	170	0.02	< 0.005	—	171
Total	0.02	0.01	0.15	0.06	< 0.005	0.01	—	0.01	0.01	—	0.01	—	170	170	0.02	< 0.005	—	171

4.3. Area Emissions by Source

4.3.2. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	19.4	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Consumer Products	—	4.93	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	1.31	1.25	0.14	13.6	< 0.005	0.01	—	0.01	0.01	—	0.01	—	36.4	36.4	< 0.005	< 0.005	—	36.5

Total	1.31	25.6	0.14	13.6	< 0.005	0.01	—	0.01	0.01	—	0.01	0.00	36.4	36.4	< 0.005	< 0.005	—	36.5
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	19.4	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Consumer Products	—	4.93	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.00	24.3	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	1.19	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Consumer Products	—	0.90	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.16	0.16	0.02	1.70	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.13	4.13	< 0.005	< 0.005	—	4.14
Total	0.16	2.25	0.02	1.70	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	4.13	4.13	< 0.005	< 0.005	—	4.14

4.4. Water Emissions by Land Use

4.4.2. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	18.1	23.2	41.3	0.06	0.04	—	54.7
Total	—	—	—	—	—	—	—	—	—	—	—	18.1	23.2	41.3	0.06	0.04	—	54.7
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	18.1	23.2	41.3	0.06	0.04	—	54.7
Total	—	—	—	—	—	—	—	—	—	—	—	18.1	23.2	41.3	0.06	0.04	—	54.7
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	2.99	3.85	6.84	0.01	0.01	—	9.06
Total	—	—	—	—	—	—	—	—	—	—	—	2.99	3.85	6.84	0.01	0.01	—	9.06

4.5. Waste Emissions by Land Use

4.5.2. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	34.2	0.00	34.2	3.41	0.00	—	120
Total	—	—	—	—	—	—	—	—	—	—	—	34.2	0.00	34.2	3.41	0.00	—	120

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	34.2	0.00	34.2	3.41	0.00	—	120
Total	—	—	—	—	—	—	—	—	—	—	—	34.2	0.00	34.2	3.41	0.00	—	120
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	5.66	0.00	5.66	0.57	0.00	—	19.8
Total	—	—	—	—	—	—	—	—	—	—	—	5.66	0.00	5.66	0.57	0.00	—	19.8

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.65	1.65
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.65	1.65
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.65	1.65
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.65	1.65

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.27	0.27
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.27	0.27

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Sequest	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation	Site Preparation	6/1/2023	6/14/2023	5.00	10.0	—
Grading	Grading	6/15/2023	7/12/2023	5.00	20.0	—
Building Construction	Building Construction	8/10/2023	6/26/2024	5.00	230	—
Paving	Paving	7/13/2023	8/9/2023	5.00	20.0	—
Architectural Coating	Architectural Coating	8/24/2023	7/10/2024	5.00	230	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	4.00	8.00	84.0	0.37
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Excavators	Diesel	Average	1.00	8.00	36.0	0.38
Grading	Tractors/Loaders/Backhoes	Diesel	Average	3.00	8.00	84.0	0.37

Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.00	7.00	84.0	0.37
Paving	Pavers	Diesel	Average	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	14.3	LDA,LDT1,LDT2
Site Preparation	Vendor	—	8.80	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	15.0	14.3	LDA,LDT1,LDT2
Grading	Vendor	—	8.80	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	173	14.3	LDA,LDT1,LDT2

Building Construction	Vendor	25.7	8.80	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	14.3	LDA,LDT1,LDT2
Paving	Vendor	—	8.80	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	34.6	14.3	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	8.80	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	466,560	155,520	0.00	0.00	—

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)

Site Preparation	—	—	15.0	0.00	—
Grading	—	—	20.0	0.00	—
Paving	0.00	0.00	0.00	0.00	—

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Apartments Mid Rise	—	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2023	0.00	375	0.01	< 0.005
2024	0.00	375	0.01	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Apartments Mid Rise	1,306	1,178	982	453,017	20,704	18,687	15,566	7,183,946

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Apartments Mid Rise	—
Wood Fireplaces	0
Gas Fireplaces	0
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	240
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
466560	155,520	0.00	0.00	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Apartments Mid Rise	1,188,099	312	0.0129	0.0017	3,208,313

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Apartments Mid Rise	8,462,160	2,661,977

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Apartments Mid Rise	63.4	0.00

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Apartments Mid Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Apartments Mid Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type
—	—

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	22.9	annual days of extreme heat
Extreme Precipitation	3.45	annual days with precipitation above 20 mm
Sea Level Rise	0.00	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider different increments of sea level rise coupled with extreme storm events. Users may select from four model simulations to view the range in potential inundation depth for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 50 meters (m) by 50 m, or about 164 feet (ft) by 164 ft.
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A

Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack	N/A	N/A	N/A	N/A
Air Quality	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack	N/A	N/A	N/A	N/A
Air Quality	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	55.4
AQ-PM	35.0
AQ-DPM	16.6
Drinking Water	35.3
Lead Risk Housing	10.0
Pesticides	74.0
Toxic Releases	9.73
Traffic	25.4
Effect Indicators	—
CleanUp Sites	0.00
Groundwater	41.0
Haz Waste Facilities/Generators	1.80
Impaired Water Bodies	0.00
Solid Waste	36.5
Sensitive Population	—
Asthma	43.5
Cardio-vascular	80.2
Low Birth Weights	51.3
Socioeconomic Factor Indicators	—
Education	66.6
Housing	30.6

Linguistic	15.6
Poverty	38.1
Unemployment	—

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	58.7065315
Employed	78.94264083
Education	—
Bachelor's or higher	41.92223791
High school enrollment	24.48351084
Preschool enrollment	59.77158989
Transportation	—
Auto Access	98.98626973
Active commuting	7.481072758
Social	—
2-parent households	90.36314641
Voting	80.41832414
Neighborhood	—
Alcohol availability	89.42640832
Park access	15.60374695
Retail density	5.286795842
Supermarket access	13.22982163
Tree canopy	7.134607982
Housing	—

Homeownership	76.8766842
Housing habitability	70.96111895
Low-inc homeowner severe housing cost burden	89.20826383
Low-inc renter severe housing cost burden	11.6514821
Uncrowded housing	79.21211344
Health Outcomes	—
Insured adults	61.8760426
Arthritis	0.0
Asthma ER Admissions	59.9
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	35.8
Cognitively Disabled	21.0
Physically Disabled	29.8
Heart Attack ER Admissions	39.6
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	19.6
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0

Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	91.6
Elderly	36.8
English Speaking	48.1
Foreign-born	28.4
Outdoor Workers	19.2
Climate Change Adaptive Capacity	—
Impervious Surface Cover	88.2
Traffic Density	44.7
Traffic Access	23.0
Other Indices	—
Hardship	38.2
Other Decision Support	—
2016 Voting	71.9

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	29.0
Healthy Places Index Score for Project Location (b)	73.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health and Equity Evaluation Scorecard not completed.

8. User Changes to Default Data

Screen	Justification
Land Use	Lot acreage adjusted to include total actual site acreage.
Construction: Construction Phases	Architectural coating assumed to start two weeks after building construction and last for the same duration.

Housing Element Site 18 Project
Response to IS Comments

An Initial Study (IS) was prepared for the Housing Element Site 18 Project (proposed project) in accordance with CEQA indicating that the proposed project will not have a significant effect on the environment. The IS provides a thorough description and analysis of the potential environmental effects of the project. The public review period for the IS began on December 7, 2022 and ended on January 9, 2023 at 5:30 PM. The City received four comment letters during the public review period.

The responses below include responses to each comment letter submitted regarding the proposed project. Where revisions to the IS text are required in response to a comment, new text is double underlined and deleted text is ~~struck through~~.

Letter 1 ..... Karen Huss, Sacramento Metropolitan Air Quality Management District
Letter 2 ..... Gavin McCreary, Department of Toxic Substances Control
Letter 3 ..... Peter Minkel, Central Valley Regional Water Quality Control Board
Letter 4 ..... Jerry Park, Sacramento Municipal Utility District

1. *Sacramento Metropolitan Air Quality Management District*

A comment letter from Sacramento Metropolitan Air Quality Management District (SMAQMD) was received on December 22, 2022. In response to SMAQMD's comment regarding the finalized Friant Ranch guidance, page 21 of the IS is hereby revised as follows:

> […] SMAQMD released the *Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District* (~~Draft~~ Final Guidance) for the analysis of criteria emissions in areas within the SMAQMD jurisdiction. The ~~Draft~~ Final 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.

As acknowledged by SMAQMD, impacts from State Route 99 emissions on the proposed project are not required to be considered under CEQA; thus, there is no nexus for mitigation regarding such impacts. However, the recommendations regarding a vegetative barrier on the western edge of the project site have been noted for the record, and will be forwarded to the decision-makers as part of their consideration of the proposed project.

In response to the comment regarding the timing of completion of the City's Climate Action Plan sustainability checklist, Mitigation Measure VIII-1, on page 48 of the IS, is hereby revised as follows:

> *VIII-1.* *Prior to the ~~issuance of grading permits~~ approval of the site design review, the project applicant/developer shall complete a CAP Sustainability Checklist to ensure the project's consistency with the sustainability measures listed in the City's CAP, which shall be submitted to the City of*

> *Galt Community Development Department for review and approval. Applicable sustainability measures required for the proposed project may include, but not be limited to: […].*

In response to the comment regarding the need to submit a construction equipment list to SMAQMD, page 47 of the IS is hereby revised as follows:

> […] Additionally, project construction would be required to include a percentage of construction equipment meeting the USEPA's Tier 4 standards. In addition to resulting in reduced particulate matter and NO_X emissions, use of Tier 4 engines consumes approximately five percent less fuel than standard construction equipment. Increased fuel efficiency and decreased total fuel consumption would directly reduce construction-related GHG emissions. ~~All construction equipment in operation would be reported to SMAQMD on a monthly basis.~~ Furthermore, the Galt CAP sustainability checklist requires outdoor electrical outlets or infrastructure to support the use of all electric landscaping equipment.

The foregoing revisions would not change the analysis or conclusions presented within the IS.

2. *Department of Toxic Substances Control*

The comment letter from the Department of Toxic Substances Control (DTSC) was received on January 5, 2023. The DTSC recommends that the IS address the potential for the project site to appear on a list of sites impacted by hazardous waste or hazardous materials that is not the Cortese List. The IS evaluates whether the project site is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, which comprises the Cortese List; thus, the IS adequately addresses the potential for the project site to be located on a site impacted by hazardous waste or hazardous materials, pursuant to CEQA requirements. Furthermore, as noted on page 51 of the IS, the project site does not appear on the DTSC's EnviroStor database. Therefore, concerns regarding the project site's presence on a list of sites impacted by hazardous waste or hazardous materials has been adequately addressed in the IS.

The DTSC also recommends that the IS include a discussion of the past and future release of hazardous waste on-site. The potential for release of hazardous materials is adequately discussed in Section IX, Hazards and Hazardous Materials, of the IS. As noted therein, impacts related to hazardous materials would be reduced to less-than-significant levels with implementation of Mitigation Measure IX-1, which requires the 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). Compliance with Mitigation Measure IX-1 will ensure that if the project site has been subject to historic activities resulting in the release of hazardous waste and/or hazardous substances on-site, proper remediation would occur. With regard to the potential for future on-site activities to result in the release of hazardous materials, the proposed project consists of a General Plan Amendment and Rezone to change the site's current land use and zoning designations from Commercial and Highway Commercial, respectively, to residential uses. As stated on page 50 of the IS, residential uses are not typically associated with the routine

transport, use, disposal, or generation of substantial amounts of hazardous materials; due to the regulations governing use of hazardous products and the small amount anticipated to be used on-site, use of such products would not represent a substantial risk to public health or the environment. Therefore, the IS adequately addresses the potential for the project to result in the release of hazardous materials.

In response to the commenter's concern about proper sampling of imported soil used to backfill excavated areas, Mitigation Measure VII-1, on page 45 of the IS, requires that a design-level geotechnical report be prepared for the project site, which would ensure compliance with applicable City construction standards, including requirements for suitable fill materials.

As stated above, Mitigation Measure IX-1, on page 51 of the IS, requires the analysis of on-site soils to determine whether substantial concentrations of organochloride pesticides or other soil contaminants are present above the applicable direct exposure ESLs. Therefore, impacts related to on-site soil contaminants have been adequately addressed in the IS.

3. *Central Valley Regional Water Quality Control Board*

The comment letter from the Central Valley Regional Water Quality Control Board was received on January 9, 2023. The comment is a standard letter that provides background information regarding applicable regulations and required permits. The comment does not include any project specifics to address the adequacy of the IS, has been noted for the record, and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

4. *Sacramento Municipal Utility District*

The comment letter from the Sacramento Municipal Utility District (SMUD) was received on January 9, 2023. Regarding the presence of overhead and/or underground transmission and distribution line easements in the project vicinity, the land uses surrounding the project site are described on page 1 of the IS. As noted therein, SMUD easements are not located on or in the vicinity of the project site. The comment does not directly address the adequacy of the IS, and has been forwarded to the decision-makers for their consideration.

Regarding utility line routing, it is noted that the proposed project involves a General Plan Amendment and Rezone of the project site from Commercial and Highway Commercial, respectively, to residential uses, but does not currently propose any development of the project site. Therefore, the exact utility line routing on the project site is currently undefined. However, as stated on page 81 of the IS, electrical utilities would be provided to the project site by connecting to existing SMUD infrastructure in the project vicinity, including the residences located immediately north of the project site. In addition, as stated therein, sufficient capacity exists to serve the electrical demand of the project site. Therefore, utility line routing and electrical needs of the proposed project are adequately addressed in the IS.

As described throughout Section VI, Energy, beginning on page 38 of the IS, the proposed project would be subject to all applicable California Building Standards Code (CBSC) requirements. The IS determined that compliance with such regulations would ensure that energy use associated with the proposed project would not be inefficient. Therefore, energy efficiency has been adequately addressed in the IS. In addition, Mitigation Measure VIII-1, located on page 48 of the IS, requires the proposed project to comply with the sustainability measures listed in the City's Climate Action Plan (CAP). As described therein, compliance with the CAP would reduce impacts related to greenhouse gas emissions, and, by extension, climate change. Therefore, impacts related to climate change have been adequately addressed in the IS.

As stated above, the IS determined that adequate capacity exists to serve the electrical demands of the proposed project. Therefore, impacts related to the need for increased electrical delivery have been adequately addressed in the IS. Furthermore, the proposed project would not require the relocation or removal of any existing SMUD infrastructure.

Housing Element Site 18 Project
Mitigation Monitoring and Reporting Program

January 2023

The California Environmental Quality Act (CEQA) and CEQA Guidelines require Lead Agencies to adopt a program for monitoring the mitigation measures required to avoid the significant environmental impacts of a project. The Mitigation Monitoring and Reporting Program (MMRP) ensures that mitigation measures imposed by the City are completed at the appropriate time in the development process.

The mitigation measures identified in the Initial Study/Mitigated Negative Declaration (IS/MND) for the Housing Element Site 18 Project are listed in the MMRP along with the party responsible for monitoring implementation of the mitigation measure, the milestones for implementation and monitoring, and a sign-off that the mitigation measure has been implemented.

Mitigation Monitoring and Reporting Program Housing Element Site 18 Project				
Timing of Verification	**Measure Complete? (check)**	**Mitigation Measures**	**Responsibility (Implementation)**	**Responsibility (Monitoring)**
IV. Biological Resources				
In conjunction with submittal of an application for future development within the project site.		*Prepare a Biological Report* ***Mitigation Measure IV-1.*** *In conjunction with submittal of an application for future development within the project site, the future project applicant shall retain a qualified biologist to conduct a preconstruction survey to determine the presence of any sensitive natural communities, wetlands, or Waters of the U.S. on the project site. The written results of the pre-construction survey shall be submitted to the City Community Development Department for review. If the aforementioned communities or waters are determined be absent from the project site, then additional action would not be necessary. If any of the above communities or waters are found, then the biologist shall include specific mitigation measures in the Biological Report should the habitat be located on the project site. Mitigation measures may include non-disturbance buffers, construction monitoring, preserving and enhancing existing waters or sensitive communities, or obtaining the proper Clean Water Act certification.*	Project Applicant Approved biologist	City of Galt Community Development Department
Prior to the approval of grading and improvement plans, and before any groundbreaking activities associated with the project.		*Obtain an SSHCP Permit* ***Mitigation Measure IV-2.*** *Before the approval of grading and improvement plans and before any groundbreaking activity associated with the project, the project applicant 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;*	Project Applicant	City of Galt Community Development Department

Mitigation Monitoring and Reporting Program Housing Element Site 18 Project				
Timing of Verification	**Measure Complete? (check)**	**Mitigation Measures**	**Responsibility (Implementation)**	**Responsibility (Monitoring)**
		• *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; and* • *Results of Covered Species (special-status species) Pre-Construction Surveys.* <u>*Special-Status Plant Species*</u>		
Prior to ground-disturbing activities.		***Mitigation Measure IV-3(a).*** *If a Covered Activity project site contains SSHCP-modeled habitat for Bogg's Lake hedge-hyssop (Gratiola heterosepala), dwarf downingia (Downingia pusilla), legenere (Legenere limosa), slender Orcutt grass (Orcuttia tenuis), Sacramento Orcutt grass (Orcuttia viscida), 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 shall identify and map plant species occurrences according to the protocols. See Chapter 10 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 remainder of the mitigation measures for plants are not necessary.*	Project Applicant Approved biologist	City of Galt Community Development Department
Prior to ground-disturbing activities.		***Mitigation Measure IV-3(b).*** *If a rare plant listed in Mitigation Measure IV-3(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*	Project Applicant Approved biologist	City of Galt Community Development Department

Mitigation Monitoring and Reporting Program Housing Element Site 18 Project				
Timing of Verification	**Measure Complete? (check)**	**Mitigation Measures**	**Responsibility (Implementation)**	**Responsibility (Monitoring)**
		unprotected occurrence of the species is protected within a SSHCP Preserve before any ground disturbance occurs on the project site. (SSHCP 2018).		
During the appropriate bloom period prior to construction.		***Mitigation Measure IV-4.*** *During the appropriate bloom period prior to construction, a qualified botanist shall conduct special-status plant species presence/absence surveys within areas proposed for grading or modification, in accordance with Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (California Department of Fish and Wildlife, 2009) to determine which special-status plants with the potential to occur on site are evident and identifiable on-site. These surveys can be conducted concurrently with surveys required under IV-3(a). If any sensitive plant species are observed during the presence/ absence surveys and it is determined that such plants would be impacted by project activities, CDFW and the USFWS (if the species is also on the federal list of sensitive species) shall be consulted to determine appropriate measures to ensure the protection of the species and its habitat. Such mitigation shall include avoidance or, if avoidance is not possible, relocation of affected plants to a mitigation site located in similar habitat within the project site in an area where no impacts are expected to occur. The relocation site shall be in an area that is protected from impacts through human disturbance by fencing during the season that special-status plant species would be evident and identifiable—i.e., during the recognized bloom period. The results of the special-status plant surveys shall be submitted to the City of Galt Community Development Department for review and approval.*	Project Applicant Approved biologist	City of Galt Community Development Department
		<u>*Swainson's Hawk*</u>		
Prior to and during all ground-disturbing activities.		***Mitigation Measure IV-5.*** *If a development project in the project site contains Modeled Covered Species Habitat for*	Project Applicant	City of Galt Community

Mitigation Monitoring and Reporting Program Housing Element Site 18 Project				
Timing of Verification	**Measure Complete? (check)**	**Mitigation Measures**	**Responsibility (Implementation)**	**Responsibility (Monitoring)**
		Swainson's Hawk (Buteo swainsoni), the Project Proponent shall comply with SSHCP AMMs SWHA-1 (Swainson's hawk surveys) and SWHA-2 (Swainson's hawk pre-construction surveys) and based on the results of surveys conducted under those measures, comply with SWHA-3 (Swainson's hawk nest buffer) and SWHA-4 (Swainson's hawk nest buffer monitoring). *<u>American Badger</u>*	Approved biologist	Development Department
Prior to and during all ground-disturbing activities.		***Mitigation Measure IV-6.*** *There are no species-specific SSHCP AMMs for American badger. However, this is a Covered Species, and the Project applicants shall comply with SSHCP requirements, In-Lieu Fee Program, and relevant AMMs.* *<u>Tricolored Blackbird</u>*	Project Applicant	City of Galt Community Development Department
Prior to and during all ground-disturbing activities.		***Mitigation Measure IV-7.*** *If a development project in the project site contains Modeled Covered Species Habitat for Tricolored Blackbird (Agelaius tricolor), the Project Proponent shall comply with SSHCP AMMs TCB- 1(tricolored blackbird surveys) and TCB-2 (tricolored blackbird pre-construction surveys) and based on the results of surveys conducted under those measures, comply with TCB-3 (tricolored blackbird nest buffer), TCB-4 (tricolored blackbird nest buffer monitoring), and TCB-5 (timing of pesticide use and harvest timing on agricultural preserve).* *<u>White-Tailed Kite</u>*	Project Applicant Approved biologist	City of Galt Community Development Department
Prior to and during all ground-disturbing activities.		***Mitigation Measure IV-8.*** *The project applicants shall comply with SSHCP AMMs RAPTOR-1 (raptor surveys) and RAPTOR-2 (raptor pre-construction surveys), and based on the results of surveys conducted under those measures,*	Project Applicant Approved biologist	City of Galt Community Development Department

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Timing of Verification	**Measure Complete? (check)**	**Mitigation Measures**	**Responsibility (Implementation)**	**Responsibility (Monitoring)**
		comply with RAPTOR-3 (raptor nest/roost buffer), and RAPTOR-4 (raptor nest/roost buffer monitoring. *<u>Western Pond Turtle</u>*		
Prior to and during all ground-disturbing activities.		***Mitigation Measure IV-9.*** *If a development project in the project site contains Modeled Covered Species Habitat for Western Pond Turtle (Actinemys marmorata), the Project Proponent shall comply with SSHCP AMMs WPT-1 (Western Pond Turtle Survey), WPT-2 (Western Pond Turtle Work Window), WPT-3 (Western Pond Turtle Monitoring), WPT-4 (Western Pond Turtle Habitat Dewatering and Exclusion), WPT-5 (Avoid Western Pond Turtle Entrapment), WPT-6 (Erosion Control Materials in Western Pond Turtle Habitat), WPT-7 (Western Pond Turtle Modeled Habitat Speed Limit), WPT-8 (Western Pond Turtle Encounter Protocol), and WPT-9 (Western Pond Turtle Post-Construction Restoration.* *<u>Western Spadefoot</u>*	Project Applicant Approved biologist	City of Galt Community Development Department
Prior to and during all ground-disturbing activities.		***Mitigation Measure IV-10.*** *If a development project in the project site contains Modeled Covered Species Habitat for Western Spadefoot (Spea hammondii), the Project Proponent shall comply with SSHCP AMMs WS-1(Western Spadefoot Work Window), WS-2 (Western Spadefoot Exclusion Fencing), WS-3 (Western Spadefoot Monitoring), WS-4 (Avoid Western Spadefoot Entrapment), WS-5 (Erosion Control Materials in Western Spadefoot Habitat), and WS-6 (Western Spadefoot Encounter Protocol).* *<u>California Tiger Salamander</u>*	Project Applicant Approved biologist	City of Galt Community Development Department
Prior to and during all ground-disturbing activities.		***Mitigation Measure IV-11.*** *If a development project in the project site contains Modeled Covered Species Habitat for California Tiger Salamander (Ambystoma californiense), the*	Project Applicant Approved biologist	City of Galt Community Development

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Timing of Verification	**Measure Complete? (check)**	**Mitigation Measures**	**Responsibility (Implementation)**	**Responsibility (Monitoring)**
		Project Proponent shall comply with SSHCP AMMs CTS-1 (California Tiger Salamander Daily Construction Schedule), CTS-2 (California Tiger Salamander Exclusion Fencing), CTS-3 (California Tiger Salamander Monitoring), CTS-4 (Avoid California Tiger Salamander Entrapment), CTS-5 (California Tiger Salamander Encounter Protocol), CTS-6 (Erosion Control Materials in California Tiger Salamander Habitat), and CTS-7 (Rodent Control). *<u>Giant Garter Snake</u>*		Department
Prior to and during all ground-disturbing activities.		***Mitigation Measure IV-12.*** *If a development project in the project site contains Modeled Covered Species Habitat for Giant Garter Snake (Thamnophis gigas), the Project Proponent shall comply with SSHCP AMMs GGS-1 (Giant Garter snake Surveys), GGS-2 (Giant Garter snake Work Window), GGS-3 (Giant Garter snake Monitoring), GGS-4 (Giant Garter snake Habitat Dewatering and Exclusion), GGS-5 (Avoid Giant Garter snake Entrapment), GGS-6 (Erosion Control Materials in Giant Garter snake Habitat), GGS-7 (Giant Garter snake Encounter Protocol), GGS-8 (Giant Garter snake Post-Construction Restoration), GGS-9 (Giant Garter snake Relocation Plan), and GGS-10 (Giant Garter snake Post-Construction Restoration).* *<u>Nesting Raptors and Migratory Birds including California black rail and Yellow-headed blackbird</u>*	Project Applicant Approved biologist	City of Galt Community Development Department
Prior to construction.		***Mitigation Measure IV-13.*** *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). These surveys can be conducted concurrently with surveys required under IV-5. The*	Project Applicant Approved biologist	City of Galt Community Development Department

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Timing of Verification	**Measure Complete? (check)**	**Mitigation Measures**	**Responsibility (Implementation)**	**Responsibility (Monitoring)**
See Mitigation Measure IV-1.		*results of the preconstruction nesting bird survey shall be submitted to the City of Galt. If nests are not found during the survey, further measures shall not be required. 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.* ***Mitigation Measure IV-14.*** *Implement Mitigation Measure IV-1.*	See Mitigation Measure IV-1.	See Mitigation Measure IV-1.
V. Cultural Resources				
Prior to issuance of grading permits.		***Mitigation Measure 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.*	Project Applicant Qualified archaeologist	City of Galt Community Development Department

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Timing of Verification	**Measure Complete? (check)**	**Mitigation Measures**	**Responsibility (Implementation)**	**Responsibility (Monitoring)**
Prior to issuance of grading permits.		***Mitigation Measure V-2.*** *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 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 (pursuant to §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.*	Project Applicant A professional archaeologist	City of Galt Community Development Department Sacramento County Coroner Native American Heritage Commission

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Timing of Verification	**Measure Complete? (check)**	**Mitigation Measures**	**Responsibility (Implementation)**	**Responsibility (Monitoring)**
VII. Geology and Soils				
Prior to issuance of grading permits.		***Mitigation Measure VII-1.*** *Prior to issuance of a grading permit, the applicant/developer shall incorporate the recommendations of a design-level geotechnical report into project Improvement Plans for review and approval by the City Engineer. Should expansive or otherwise unstable soils be found within the project site, the design-level geotechnical report shall include measures necessary to ensure that such on-site conditions are fully mitigated. Methods of mitigating potential on-site soil expansive soils may include, but shall not be limited to, the following measures:* • *Remove and replace potentially expansive soils; and/or* • *Strengthen foundations (e.g., post-tensioned slab, reinforced mat or grid foundation, or other similar system) to resist excessive differential settlement associated with seismically-induced soil expansion.*	Project Applicant	City Engineer
Prior to issuance of grading permits.		***Mitigation Measure VII-2.*** *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, 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.*	Project Applicant Qualified archaeologist or paleontologist	City of Galt Community Development Department

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Timing of Verification	**Measure Complete? (check)**	**Mitigation Measures**	**Responsibility (Implementation)**	**Responsibility (Monitoring)**
VIII. Greenhouse Gas Emissions				
Prior to the approval of the site design review.		***Mitigation Measure VIII-1.*** *Prior to the approval of the site design review, the project applicant/developer shall complete a CAP Sustainability Checklist to ensure the project's consistency with the sustainability measures listed in the City's CAP, which shall be submitted to the City of Galt Community Development Department for review and approval. Applicable sustainability measures required for the proposed project may include, but not be limited to:* • *The incorporation of on-site bicycle, pedestrian, and/or transit infrastructure;* • *Traffic calming and congestion management measures for at least 50 percent of all on-site roadways and intersections;* • *Electric Vehicle changing infrastructure;* • *The inclusion of infrastructure supporting alternative transportation to school;* • *The use of construction equipment that meets the City's mobile source emissions reductions requirements;* • *Zero net energy (ZNE) structures and on-site renewable energy generation;* • *The provision of adequate recycling and green waste facilities;* • *Urban tree planting in compliance with the City's requirements; and/or* • *The provision of outdoor electrical outlets or infrastructure to support all electric landscaping equipment* *In addition, the proposed project would be required to meet at least one additional Sustainable Design Option included in*	Project Applicant	City of Galt Community Development Department

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Timing of Verification	**Measure Complete? (check)**	**Mitigation Measures**	**Responsibility (Implementation)**	**Responsibility (Monitoring)**
		Section 2 of the CAP Sustainability Checklist. Sustainable Design Options include: • *Reuse or redevelopment of an existing building or previously developed parcel;* • *Being located in an urban area on a site that has either been previously developed or adjoins existing development on at least 75 percent of the site's perimeter;* • *Inclusion of a mix of land uses;* • *Permanent protection of high-quality farmland;* • *Inclusion of all electric appliances, or the otherwise reduction of the amount of natural gas consumed on-site;* • *Participation in a Transportation Management Association established by the City or other agencies;* • *The purchase of carbon off-set credits or implementation of a carbon sequestration program sufficient to off-set 15 percent or more of the project's anticipated greenhouse gas emissions; and* • *Exceedance of the on-site renewable energy standards required by the applicable California Building Standards Code.*		
Prior to construction.		***Mitigation Measure VIII-2.*** *In the event that project construction occurs after the year 2025:* *Prior to the start of construction activities, the project applicant shall submit a construction equipment inventory list to the City Engineer demonstrating compliance with USEPA 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*	Project Applicant	City Engineer

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Timing of Verification	**Measure Complete? (check)**	**Mitigation Measures**	**Responsibility (Implementation)**	**Responsibility (Monitoring)**
		are implemented to a level sufficient to achieve similar emission reductions as would occur with the use of Tier 4 engines.		
IX. Hazards and Hazardous Materials				
Prior to construction.		***Mitigation Measure IX-1.*** *Prior to initiation of construction activities on the proposed project site, 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 (RSLs) 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.*	Project Applicant Class A licensed hazardous waste contractor and contractor personnel that have completed 40-hour OSHA hazardous training	City of Galt Community Development Department
X. Hydrology and Water Quality				
Prior to issuance of grading permits.		***Mitigation Measure 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.*	Project Applicant	City Engineer

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Timing of Verification	**Measure Complete? (check)**	**Mitigation Measures**	**Responsibility (Implementation)**	**Responsibility (Monitoring)**
Prior to construction.		***Mitigation Measure X-2.*** *If a site-specific geotechnical report required by Mitigation Measure VII-1 identifies a near-surface groundwater table within the project site, the project applicant shall obtain the appropriate NPDES dewatering general permit prior to commencement of dewatering activities. Should such a permit be required, the project applicant shall prepare a Dewatering Plan that includes measures sufficient to ensure that dewatering activity does not result in a violation of water quality standards. Such measures may include sediment detention basins or clarifiers sufficient to properly treat any dewatering runoff prior to discharge. The plan shall be reviewed and approved by the City Community Development Department.*	Project Applicant	City of Galt Community Development Department
See Mitigation Measures X-1 and X-2.		***Mitigation Measure X-3.*** *Implement Mitigation Measure X-1 and X-2.*	See Mitigation Measures X-1 and X-2.	See Mitigation Measures X-1 and X-2.
Prior to issuance of grading permits.		***Mitigation Measure XIII-4.*** *Prior to issuance of grading permits, the developer shall submit a Final Drainage Plan to the City. The Final Drainage Plan shall identify permanent stormwater control measures to be implemented within the project site. The final plan shall include calculations demonstrating that post-project stormwater flows comply with the applicable provisions of Section 9 of the Sacramento County Improvement Standards as well as the draft Sacramento Region Stormwater Quality Design Manual. The Final Drainage Plan shall be submitted to the Public Works Department for review and approval.*	Project Applicant	City of Galt Public Works Department
XIII. Noise				
Prior to issuance of grading permits and during construction.		***Mitigation Measure XIII-1.*** *Construction activities shall comply with the City of Galt Noise Ordinance and shall be limited to the hours set forth below:*	Project Applicant	City of Galt Public Works Department Chief Building Official/City

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Timing of Verification	**Measure Complete? (check)**	**Mitigation Measures**	**Responsibility (Implementation)**	**Responsibility (Monitoring)**
		Monday-Friday 6:00 AM to 8:00 PM *Saturday and Sunday 7:00 AM to 8:00 PM* *These 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.*		Engineer
Prior to issuance of grading permits and during construction.		***Mitigation Measure XIII-2.*** *Construction activities shall adhere to the requirements of the City of Galt with respect to hours of operation, muffling of internal combustion engines, and other factors that affect construction noise generation and its effects on noise-sensitive land uses. Prior to issuance of grading permits, these criteria shall be included in the grading plan submitted by the applicant/developer for the review and approval of the Public Works Department.*	Project Applicant	City of Galt Public Works Department
During construction.		***Mitigation Measure XIII-3.*** *During construction, the applicant/developer shall designate a disturbance coordinator and conspicuously post this person's number around the project site and in adjacent public spaces. The disturbance coordinator will receive all public complaints about construction noise disturbances and will be responsible for determining the cause of the complaint, and implement feasible measures to be taken to alleviate the problem. The disturbance coordinator shall report all complaints and corrective measures taken to the Community Development Director.*	Project Applicant Disturbance coordinator	City of Galt Community Development Director
XVIII. Tribal Cultural Resources				
See Mitigation Measures V-1 and V-2.		***Mitigation Measure XVIII-1.*** *Implement Mitigation Measures V-1 and V-2.*	See Mitigation Measures V-1 and V-2.	See Mitigation Measures V-1 and V-2.