

ENVIRONMENTAL ASSESSMENT



Wilton Rancheria 90.57-Acre Fee-to-Trust and Commercial Development Project Elk Grove, California | April 2026

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Acronyms

AB	Assembly Bill
amsl	above mean sea level
ARPA	Archaeological Resources Protection Act
AST	aboveground storage tank
ASTM	American Society for Testing and Materials
bgs	below ground surface
BIA	U.S. Bureau of Indian Affairs
BIOS	Biogeographic Information and Observation System
BMPs	Best Management Practices
CAA	Clean Air Act
CAAQS	California Ambient air quality standards
CalEEMod	California Emissions Estimator Model
CAL FIRE	California Department of Forestry and Fire Protection
CalRecycle	California Department of Resources, Recycling, and Recovery
Caltrans	California Department of Transportation
CAPs	criteria air pollutants
CARB	California Air Resources Board
CCAA	California Clean Air Act
CCSD	Cosumnes Community Services District
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CESA	California Endangered Species Act
CFR	Code of Federal Regulations
CGS	California Geological Survey
CHRIS	California Historical Resources Information System
CNDDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CO	carbon monoxide
CWA	Clean Water Act
dBA	A-weighted decibels
DOC	California Department of Conservation
DOI	U.S. Department of the Interior
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control

DWR	Department of Water Resources
EA	Environmental Assessment
ECHO	Enforcement and Compliance History Online
EFH	Essential Fish Habitat
EGMC	Elk Grove Municipal Code
EIR	Environmental Impact Report
EO	Executive Order
EPCRA	Emergency Planning and Community Right-to-Know Act
ESA	Environmental Site Assessment
FAA	Federal Aviation Administration
FCIR	Farmland Conversion Impact Rating
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FHSZ	Fire Hazard Severity Zone
FHWA	Federal Highway Administration
FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act
FMMP	Farmland Mapping and Monitoring Program
FPPA	Farmland Protection Policy Act
FPT	Fluted Point Tradition
FTA	Federal Transit Administration
GSA	Groundwater Sustainability Agency
HAPs	Hazardous Air Pollutants
HCS	Hazard Communication Standard
HEARTH	Helping Expedite and Advance Responsible Tribal Homeownership Act
HSA	Hazardous Substances Act
HU	Hydrologic Unit
HVAC	heating, ventilation, and air conditioning
I-5	Interstate 5
IAM	Indian Affairs Manual
L _{dn}	Day-Night Average Level
L _{eq}	equivalent continuous sound level
LUST	Leaking Underground Storage Tank
MBTA	Migratory Bird Treaty Act
MOU	Memorandum of Understanding
MRZ	Mineral Resource Zone
MT	metric tons
N/A	Not Applicable
NAAQS	National Ambient Air Quality Standards
NAC	Noise Abatement Criteria
NAGPRA	Native American Graves Protection and Repatriation Act
NAHC	Native American Heritage Commission
NDGSA	Northern Delta Groundwater Sustainability Agency
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NOAA	National Oceanic and Atmosphere Administration

NO ₂	nitrogen dioxide
NOI	Notice of Intent
NO _x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NSR	New Source Review
NWI	National Wetlands Inventory
NWSRS	National Wild and Scenic River System
O ₃	ozone
OHWD	Omoichumne-Hartnell Water District
OSHA	Occupational Safety and Health Administration
Pb	lead
PG&E	Pacific Gas and Electric
PM _{2.5}	particulate matter smaller than 2.5 microns
PM ₁₀	particulate matter smaller than 10 microns
ppb	parts per billion
ppm	parts per million
PSD	Prevention of Significant Deterioration
RCRA	Resource Conservation and Recovery Act
RD	Reclamation District
RECs	Recognized Environmental Conditions
ROG	reactive organic gas
RTFA	Right to Farm Act
RWQCB	Regional Water Quality Control Boards
SacRT	Sacramento Regional Transit
SASD	Sacramento Area Sewer District
SCGA	Sacramento Central Groundwater Authority
SCWA	Sacramento County Water Agency
SDWA	Safe Drinking Water Act
SGMA	Sustainable Groundwater Management Act
SHPO	State Historic Preservation Officer
SIP	State Implementation Plan
SMAQMD	Sacramento Metropolitan Air Quality Management District
SMUD	Sacramento Municipal Utility District
SO ₂	sulfur dioxide
SPA	Special Planning Area
SR	State Route
SRCD	Sloughhouse Resource Conservation District
SVAB	Sacramento Valley Air Basin
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
THPO	Tribal Historic Preservation Officer
TMDL	Total Maximum Daily Load
tpy	tons per year

TSCA	Toxic Substances Control Act
UCMP	University of California Museum of Paleontology
USACE	U.S. Army Corps of Engineers
USC	U.S. Code
USDA	U.S. Department of Agriculture
USDOT	U.S. Department of Transportation
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UST	Underground Storage Tank
VMT	vehicle miles traveled
VOC	volatile organic compound
WSMP	Water Supply Master Plan

1.0 INTRODUCTION

1.1 Summary

The U.S. Department of the Interior's (DOI) Bureau of Indian Affairs (BIA), Pacific Region, received an application for land acquisition under 25 Code of Federal Regulations (CFR) Part 151 to take land into federal trust status. The BIA is the lead federal agency, and this Environmental Assessment (EA) has been prepared to support the Wilton Rancheria's (Tribe) application for acquiring land into federal trust status in Sacramento County, California. The property consists of nine (9) parcels that are adjacent and contiguous to land currently held in trust for the Tribe, which is developed with the Wilton Rancheria Gaming Authority dba Sky River Casino (Casino). The proposed trust property is referred to throughout this EA as the Project Site.

The project site consists of approximately 90.57 acres, and the project site is intended for future economic development. Although the Tribe does not have immediate development plans, future use of the Project Site is reasonably foreseeable, given its proximity to the existing casino and location within an area designated by the City for future growth as part of the Lent Ranch Marketplace Special Planning Area (Lent Ranch SPA)—a local zoning designation intended to guide mixed-use commercial development. Future development may include retail spaces, office buildings, and other commercial facilities, which could create jobs, support local businesses, and stimulate regional economic growth. Consequently, the Tribe proposes that the Project Site be taken into trust to expand its land base, consolidate land ownership, and promote self-determination and economic development.

The members of the federally recognized Wilton Rancheria are the descendants of the Penutian linguistic family identified as speaking the Miwok dialect who lived and prospered in the Sacramento Valley since time immemorial. The former Rancheria lands of the Tribe comprised a tract of 38.81 acres, which was purchased and taken into trust in 1928.

This EA has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969 (42 U.S.C. § 4321 et seq.), the Department of Interior (DOI) NEPA regulations (43 CFR Part 46), and the DOI Handbook of NEPA Implementing Procedures (516 DM 1). Consistent with NEPA requirements, the BIA will review and analyze the environmental consequences associated with the alternatives, including the No Action alternative. Based on this review, the BIA will determine whether a Finding of No Significant Impact (FONSI) is sufficient, will request additional analysis, or will require that an Environmental Impact Statement (EIS) be prepared.

1.2 Purpose and Need for Proposed Action

The purpose of the Proposed Action is to enable future economic development opportunities consistent with Tribal goals to support self-determination by converting fee land to trust land in accordance to the DOI's land acquisition under 25 CFR Part 151. The need for the Proposed Action is a request to the BIA to approve the Tribe's application in accordance with the Indian Reorganization Act (25 USC Part 5108), the Indian Land Consolidation Act (25 USC Part 2202), and implementing federal regulation under 25 CFR Part 151.

1.3 Location and Setting

The proposed trust property consists of nine (9) parcels with the following Assessor's Parcel Number (APNs), as shown in Figure 3 of **Appendix A**: 134-1010-002-0000, 134-1010-003-0000, 134-1010-004-0000, 134-1030-004-0000, 134-1030-005-0000, 134-1030-006-0000, 134-1030-007-0000, 134-1030-008-0000, 134-1030-009-0000. The Project Site is undeveloped and currently used for hay production. It consists of approximately 90.57 acres in Elk Grove within Sacramento County, California (Figures 1 and 2 of **Appendix A**). The Project Site is in Section 18, Township 6 North, Range 6 East, Mount Diablo Meridian. Access to the Project Site is provided by Promenade Parkway, with regional connectivity via California State Route 99 (SR-99) and Kammerer Road. Most of the land was disturbed by grading activities between 2007 and 2008 during the development of a regional mall project that was later abandoned. Surrounding land uses include the Tribe's existing Sky River Casino, which attracts significant visitor traffic; other commercial developments that contribute to the local economy; residential areas that may be affected by future development; agricultural lands reflecting the region's farming heritage; and open spaces offering recreational opportunities. The topography of the Project Site is flat, with elevations ranging from 39 to 43 feet above mean sea level.

1.4 Regulatory Requirements and Approvals

The Proposed Project, as described in **Section 2**, may require the federal, State, and local permits and approvals identified in **Table 1-1**.

Table 1-1: Potential Permits and Approvals

Agency	Permit or Approval
Department of the Interior, Bureau of Indian Affairs	- Transfer of the Project Site into federal trust - Approval of easements and/or service line agreements for utilities to serve the proposed development within the Project Site following acquisition into trust - Future approval of potential rights-of-way and easements on trust land
Wilton Rancheria	Approval of building site leases by the Tribe in accordance with the Tribe's Helping Expedite and Advance Responsible Tribal Homeownership Act (HEARTH) Leasing Ordinance procedures
U.S. Environmental Protection Agency	Verification of coverage under the National Pollutant Discharge Elimination System Construction General Permit for Stormwater Discharges from Construction Activities as required by the Clean Water Act
State Historic Preservation Office	Consultation under Section 106 of the National Historic Preservation Act if historic properties may be impacted
City of Elk Grove	Potential encroachment permit(s) for access improvements
Sacramento County Water Agency	Municipal connections to water supply and treatment infrastructure
Sacramento Area Sewer District	Municipal connections to wastewater treatment and disposal infrastructure

2.0 ALTERNATIVES

This section describes the alternatives that are analyzed throughout this EA, including Alternative A (Proposed Project), and Alternative B (No Action).

2.1 Alternative A: Proposed Project

The Proposed Project consists of the acquisition of the Project Site into federal trust for the benefit of the Tribe and the reasonably foreseeable future development of the site as described below.

2.1.1 Fee-to-Trust Transfer

The Proposed Action consists of the fee simple conveyance of the Project Site into federal trust status for the benefit of the Tribe and would occur in accordance with the procedures set forth in 25 CFR Part 151. The Proposed Action would generally shift civil regulatory jurisdiction over the Project Site from the State and County to the Tribe and the federal government. Federal laws, such as the Clean Water Act (CWA), would continue to apply to the Project Site.

2.1.2 Future Development

Although the Tribe is not currently proposing specific development on the Project Site, for the purpose of the analysis in this EA, the Tribe has proposed a reasonably foreseeable development scenario that includes mixed-use commercial development (Figure 4 of **Appendix A**). Uses may include, but are not limited to:

- Retail Commercial (small, medium, and/or large-sized stores)
- Professional Office Space
- Restaurants and other Eating/Drinking Establishments
- Entertainment Uses (e.g., theaters, arcades, bowling alleys)
- Hotels
- Financial Institutions
- Grocery Markets/Food Stores
- Multi-Family Residential
- Research and Development Facilities
- Educational and Cultural Facilities
- Out-Patient Healthcare Facilities
- Service Stations
- Parks

Proposed commercial uses are consistent with those in the Lent Ranch SPA and are also compatible with the Tribe's nearby Sky River Casino. The northernmost parcels (approximately 17.5 acres) are estimated to contain 150,000 square feet of building space. The southernmost parcels (approximately 73 acres) are estimated to contain 300,000 to 400,000 square feet of building space. The remainder of the parcels would be used for parking, circulation, and landscaping.

Circulation and Parking

Alternative A would include ingress and egress from Bilby Road, Promenade Parkway, Lent Ranch Parkway, Kyler Road/Kaiser Driveway, and Kammerer Road. Parking for the proposed land uses would be provided through paved surface parking areas with parking space ratios equal to or greater than the minimum ratios specified in the Lent Ranch SPA.

Utilities and Public Services

Water supply and treatment would be obtained through nearby municipal connections to Sacramento County Water Agency (SCWA) infrastructure. Wastewater treatment and disposal would be obtained through nearby municipal connections to Sacramento Area Sewer District (SASD) infrastructure. Electricity would be provided by Sacramento Municipal Utility District (SMUD) and natural gas would be provided by Pacific Gas & Electric (PG&E). Law enforcement services to the Project Site would be provided by the City of Elk Grove Police Department, which currently provides services to the adjacent Sky River Casino through a Memorandum of Understanding (MOU) with the Tribe. Fire protection and emergency medical services would be provided by the Consumnes Community Services District (CCSD) Fire Department, which also currently provides services to the adjacent Sky River Casino through an MOU.

Grading and Drainage

The Project Site contains relatively flat topography, thus only minor grading would be necessary, and balanced cut and fill would be utilized. Stormwater on the Project Site drains to an existing detention basin to the west. This detention basin has been designed to control runoff from the Lent Ranch SPA, which includes the Project Site. Runoff ultimately drains into the Beach Stone Lakes basin via the Shed C Channel.

Construction

Construction would generally involve grubbing and clearing, grading, and paving using heavy-duty and light-duty equipment, trenching for utilities, and the development of building pads and structures. Construction equipment would consist of scrapers/earthmovers, wheeled or tracked bulldozers and loaders, dump trucks, and concrete trucks. Equipment and materials staging would occur within the Project Site. Construction would adhere to the Tribe's Building Code, which adopts standards at least as stringent as the California Building Code and the California Public Safety Code applicable to the County of Sacramento. Although a specific phasing schedule is not proposed at this time, development would most likely occur in several stages. To provide a conservative analysis, this EA assumes that construction of the entire project would begin as early as March 2026 and would last approximately 18 to 24 months¹.

Best Management Practices

Protective measures and best management practices (BMPs), including regulatory requirements and voluntary measures that would be implemented by the Tribe, have been incorporated into the design of Alternative A. Where applicable, these measures will be incorporated into any design or construction contracts to eliminate or substantially reduce potential environmental consequences. These measures are listed in **Appendix B**.

2.2 Alternative B: No Action

Under the No Action alternative, the Project Site would not be taken into trust.

¹ Assuming all construction would occur simultaneously would yield the greatest potential for effects.

Because the land is designated for commercial development in the Lent Ranch SPA, it could eventually be developed similar to Alternative A, consistent with local land use and zoning policies.

2.3 Comparison of Alternatives

Compared with the No Action alternative, impacts from developing the Proposed Project would include temporary construction activities, an increase in impervious surfaces, conversion of agricultural land, and an increase in human activities on the site, resulting in greater traffic, noise, and air quality emissions in the project area. In contrast to the No Action alternative, the Proposed Project would accomplish the purpose and need stated in **Section 1.2**.

2.4 Alternatives Eliminated from Consideration

For an EA where there are no unresolved conflicts with respect to alternative uses of available resources, only the proposed action needs to be considered (59 IAM 3-H § 6.4.4, NEPA section 102(2)(H)). No unresolved conflicts with respect to alternative uses of available resources on the Project Site have been identified. There are no known alternatives that would offer substantial environmental advantages over the Proposed Project, and which may be feasibly accomplished in a successful manner considering economic, environmental, social, technological, and legal factors. The Proposed Project uses are consistent with future growth designated by the City in the Lent Ranch Special Planning Area, and thus alternative uses were eliminated from further consideration.

3.0 ENVIRONMENTAL SETTING AND CONSEQUENCES

This section summarizes the existing environmental conditions associated with the Project Site and evaluates the potential environmental consequences of implementing each alternative. The analysis focuses on a range of resource areas consistent with NEPA and BIA guidance, including land resources, water resources, air quality, biological resources, cultural and paleontological resources, socioeconomic conditions, transportation and circulation, land use, public services, noise, hazardous materials, and visual resources.

This section presents summary-level impact analysis; **Appendix C** provides supporting documentation, including a detailed description of the environmental setting, regulatory context, and technical analysis. Where applicable, the analysis identifies any mitigation measures or BMPs that would be implemented to avoid or minimize impacts.

3.1 Land Resources

Detailed information on the physical characteristics of the Project Site, including geological setting, topography, seismic conditions, soil types and characteristics, mineral resources, applicable regulations, and potential impacts are provided in **Appendix C1**.

3.1.1 Environmental and Regulatory Setting

The Project Site is located within the Great Valley Geomorphic Province and is mostly level, with elevations ranging from 39 feet amsl to 43 feet amsl.

The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone and is not likely to be subject to major seismic ground shaking but could experience some ground shaking originating at greater distances. Soils consist of three mapped types that are moderately well drained, with a majority of soils on the Project Site having low shrink swell potential. The northern portion of the Project Site has areas with high shrink-swell potential. The Project Site is within Mineral Resource Zone (MRZ)-3, which indicates that the area contains known or inferred concrete aggregate resources of undetermined mineral resource significance. A search of the U.S. Geological Survey (USGS) Mineral Resources Data System showed a borrow pit located approximately 1.5 miles north of the Project Site, but no known mineral resources were identified within the Project Site.

3.1.2 Impacts

The following provides a summary of potential effects on land resources for each alternative. Detailed information regarding impacts can be found in **Appendix C1**.

Alternative A

- **Topography and Geology:** Topography on the Project Site is mostly level due to past grading activities and Alternative A would involve minimal grading and earthwork, as well as balanced cut and fill. **Less-than-significant impact with no mitigation.**
- **Seismic Conditions:** The site is not within an Alquist-Priolo Earthquake Fault Zone, and development would adhere to the provisions of the Tribe's Building Code, which would further reduce potential risks associated with structure damage. **Less-than-significant impact with no mitigation.**
- **Soil Hazards:** Risks associated with soil hazards would be addressed through BMPs listed in **Appendix B** which include compliance with the National Pollutant Discharge Elimination System (NPDES) Construction General Permit and preparation of a Stormwater Pollution Prevention Plan (SWPPP) during construction. **Less-than-significant impact with no mitigation.**
- **Mineral Resources:** The site is within MRZ-3, however, no known mineral resources have been identified on the Project Site. Additionally, the Lent Ranch Marketplace Environmental Impact Report (EIR) determined that impacts related to mineral resources on the Project Site would not be significant. **No Impact.**

Alternative B

Under Alternative B, no development would occur, and the Project Site would remain in its current state. **No impact.**

3.2 Water Resources

Detailed information on the existing surface water, drainage, flooding, and groundwater conditions of the Project Site, as well as applicable regulations and technical analysis of potential impacts, is provided in **Appendix C2**.

3.2.1 Environmental and Regulatory Setting

The Project Site is located within the Sacramento Drainage Canal watershed.

Surface water resources within the Project Site include a man-made marsh and man-made vernal pools, further discussed in **Appendix C4**. Other surface waters within the vicinity of the Project Site include the Consumnes River, located approximately one mile southeast. The Project Site is not within a Federal Emergency Management Agency (FEMA) floodplain.

The Project Site is located within the Sacramento Valley Groundwater Basin. Water supply and treatment in the Project Site vicinity is provided by SCWA as described further in **Appendix C9**. Water resource protection is governed by the CWA, which regulates pollutant discharges to surface waters through the NPDES Construction General Permit program; the Safe Drinking Water Act (SDWA), which establishes water quality standards; Executive Order (EO) 11988, which guides development in flood-prone areas; the Porter-Cologne Water Quality Control Act; and the Sustainable Groundwater Management Act.

3.2.2 Impacts

The following provides a summary of potential effects on water resources for each alternative. Detailed information regarding impacts can be found in **Appendix C2**.

Alternative A

- **Drainage and Flooding**: Minimal grading would be required and there would be minimal alteration of drainage patterns. The Project Site is not within a designated floodplain, and construction would not alter floodplain levels or storage (Figure 5 of **Appendix A**). Construction and operation could result in erosion and pollutant runoff. Potential impacts would be avoided or minimized through compliance with the NPDES Construction General Permit and implementation of a SWPPP with standard construction water quality BMPs (**Appendix B**). **Less than significant impact with no mitigation.**
- **Water Supply**: Water would be supplied to the Project Site through a connection to existing SCWA water supply infrastructure. The 2020 Urban Water Management Plan for SCWA projects long-term water reliability through 2045 and Alternative A is within the SPA development assumptions for the Project Site. Therefore, Alternative A would not impede the availability of water resources to foreseeably planned development. **Less than significant impact with no mitigation.**
- **Water Quality**: Potential impacts to water quality would be minimized through compliance with the NPDES Construction General Permit and implementation of a SWPPP and BMPs (**Appendix B**). **Less than significant impact with no mitigation.**

Alternative B

Under Alternative B, no development would occur, and the Project Site would remain in its current state. No impact.

3.3 Air Quality

Detailed information on air quality conditions, applicable regulatory requirements, and quantified emissions modeling is provided in **Appendix C3**.

3.3.1 Environmental and Regulatory Setting

The Project Site is located within the Sacramento Valley Air Basin (SVAB) and is under the jurisdiction of the Sacramento Metropolitan Air Quality Management District (SMAQMD). Sacramento County, where the Project Site is located, is currently designated nonattainment for ozone and particulate matter smaller than 2.5 microns (PM_{2.5}) and attainment (maintenance) for carbon monoxide (CO) and PM₁₀. Once the Project Site is taken into trust, air quality regulation would fall under the jurisdiction of the U.S. Environmental Protection Agency (USEPA). Key federal and state regulatory frameworks include the Clean Air Act (CAA) and the General Conformity Rule; hazardous air pollutants (HAPs), such as diesel particulate matter (DPM), are also considered.

3.3.2 Impacts

The following provides a summary of potential effects on air quality for each alternative. Detailed information regarding impacts can be found in **Appendix C3**.

Alternative A

- **Construction Emissions:** Equipment and site disturbance would generate criteria air pollutants (CAPs) and DPM, but emissions would not exceed federal *de minimis* thresholds. Standard construction BMPs listed in **Appendix B** including, but not limited to, site watering, street sweeping, limits on vehicle speeds, and minimization of vehicle idling, would minimize fugitive dust and other off-site emissions. **Less than significant impact with no mitigation.**
- **Operational Emissions:** Emissions from mobile, area, and energy sources would remain below *de minimis* thresholds. BMPs listed in **Appendix B** include adherence to applicable building standards and use of energy and water saving appliances, which would further minimize operational emissions. **Less than significant impact with no mitigation.**

Alternative B

Under Alternative B, no development would occur, and the Project Site would remain in its current state. **No impact.**

3.4 Biological Resources

Detailed information on biological resources, including applicable regulations, site-specific habitat conditions, and potential impacts, is provided in **Appendix C4**.

3.4.1 Environmental and Regulatory Setting

The Project Site includes ruderal/developed, agricultural (hay crop), vernal pool, and marsh habitats as shown on Figure 6 of **Appendix A**. Aquatic habitats include over 30 man-made vernal pools (totally 1.89 acres) and one man-made marsh (0.16 acres); these habitats have formed in depressions created from past development activities. On-site aquatic features are isolated and are not considered waters of the U.S. No features from the National Wetlands Inventory (NWI) are mapped within the Project Site (Figure 7 of **Appendix A**). There is no designated critical habitat or essential fish habitat (EFH) within or adjacent to the Project Site.

The Project Site is currently used for hay production and does not contain suitable habitat to support federally listed plant species. No federally listed species were observed during surveys conducted by Acorn in March 2025 and July 2025. The Project Site contains low quality habitat within the man-made vernal pools to support the following federally listed species: vernal pool fairy shrimp (*Brachinecta lynchi*) and vernal pool tadpole shrimp (*Lepidurus packardii*). Additionally, the Project Site contains minimal suitable nesting habitat for migratory birds. Relevant regulations concerning biological resources include the Federal Endangered Species Act (FESA), Migratory Bird Treaty Act (MBTA), Bald and Golden Eagle Protection Act, CWA, and relevant provisions of the California Fish and Game Code. Additional information on applicable regulations is provided in **Appendix C4**.

3.4.2 Impacts

The following provides a summary of potential effects on biological resources for each alternative. Detailed information regarding impacts can be found in **Appendix C4**.

Alternative A

- **Sensitive Habitats**: Development would avoid impacts to aquatic habitats which are located in proposed open space shown on Figure 4 of **Appendix A**. Additionally, development would incorporate BMPs listed in **Appendix B** to further reduce potential indirect impacts to aquatic features during construction. **Less than significant impact with no mitigation.**
- **Federally Listed Species**: The Project Site contains low quality habitat within the man-made vernal pools to support the following federally listed species: vernal pool fairy shrimp and vernal pool tadpole shrimp. Development would avoid direct impacts to the vernal pools which are located in proposed open space shown on Figure 4 of **Appendix A**. BMPs provided in **Appendix B** include the erection of silt fencing around vernal pool features on the Project Site prior to construction activities to protect water quality and species that may utilize this habitat. With adherence to the NPDES Construction General Permit and implementation of a SWPPP that includes BMPs listed in **Appendix B**, indirect impacts to aquatic features during construction that may provide low quality habitat to federally listed species would be less than significant. **Less than significant impact with no mitigation.**
- **Nesting Migratory Birds**: If construction activities are conducted during the nesting season (February 1 to August 31), potentially occurring nesting birds/raptors have the potential to be impacted. BMPs listed in **Appendix B** include a preconstruction nesting migratory bird/raptor survey should construction commence during the general nesting season. **Less than significant impact with no mitigation.**
- **Critical Habitat and EFH**: No designated critical habitat or EFH occurs within or adjacent to Project Site. **No impact.**

Alternative B

Under Alternative B, no development would occur, and the Project Site would remain in its current state. **No impact.**

3.5 Cultural and Paleontological Resources

Detailed information on cultural and paleontological resources, including applicable regulations, technical survey results, and impact analyses, is provided in **Appendix C5** and the Archaeological and Tribal Survey Report (**Appendix F**) prepared for the Proposed Project.

3.5.1 Environmental and Regulatory Setting

A cultural resources investigation for the Lent Ranch SPA, which includes the Project Site, was conducted in 1998. No cultural or paleontological resources were identified on the Project Site during this investigation and most of the Project Site was disturbed by grading activities from 2007 to 2008 during development of a regional mall project, which was then abandoned. In February 2026, the Wilton Rancheria Department of Cultural Preservation prepared an Archaeological and Tribal Survey Report (**Appendix F**), which includes the results of a records search completed on January 23, 2026 and an archaeological field survey on January 26, 2026. The survey identified an isolated basalt flake on the Project Site. It was determined that the isolated resource is not subject to management recommendations/protection.

The Tribe is the applicant for the Proposed Action and is the only federally recognized tribe in Sacramento County. Relevant federal regulations include Section 106 of the National Historic Preservation Act (NHPA), the Native American Graves Protection and Repatriation Act (NAGPRA), the Archaeological Resources Protection Act (ARPA), and the Paleontological Resources Preservation Act. These laws govern the identification, evaluation, and protection of archaeological, tribal, and paleontological resources on trust land.

3.5.2 Impacts

The following provides a summary of potential effects on cultural and paleontological resources for each alternative. Detailed information regarding impacts can be found in **Appendix C5**.

Alternative A

- **Cultural and Paleontological Resources:** As designed, the project is not anticipated to cause a substantial adverse change in the significance of a historic property as defined in 36 CFR 800.5(a)(1). The Project Site has been previously mass graded and used for agriculture, but unknown cultural and/or paleontological resources could be discovered during construction. BMPs include consulting with the Wilton Rancheria Department of Cultural Preservation prior to ground-disturbing activities and inviting Tribal monitors to monitor ground-disturbing activities. Inadvertent discovery protocols are included as mitigation in **Section 4.0**, which would ensure proper handling of any discoveries during construction. **Less-than-significant impact with mitigation.**

Alternative B

Under Alternative B, no development would occur, and the Project Site would remain in its current state. **No impact.**

3.6 Socioeconomic Conditions

Detailed information on socioeconomic conditions is provided in **Appendix C6**.

3.6.1 Environmental and Regulatory Setting

There are no applicable federal, State, or local regulations governing socioeconomic impacts. The Project Site is located within the City of Elk Grove in Sacramento County. In 2024, the City had a population of approximately 182,797 with a median household income of \$125,924. In 2025, the City had a low unemployment rate of 4.5%. Census Tract 96.52, which contains the Project Site, had an even higher median income (\$152,854) and an average household size of 3.75 persons. Housing vacancy rates in Elk Grove were 2.4% as of 2025, which is lower than County and State averages. Total property taxes assessed on the Project Site in FY 2024–2025 were \$472,901.58 (**Appendix C6**).

3.6.2 Impacts

The following provides a summary of potential effects on socioeconomic conditions for each alternative. Detailed information regarding impacts can be found in **Appendix C6**.

Alternative A

- **Employment and Economy:** Development would support job creation in commercial sector and construction. Employment impacts would be modest and positive in the context of an already strong regional economy. **Beneficial impact.**
- **Fiscal Impacts:** Property tax revenue (\$472,901.58 annually) would cease if the land is placed into trust. This represents only 0.021% of Sacramento County’s \$2.3 billion tax roll. Future commercial activity would generate indirect fiscal benefits. Additionally, because a portion of property taxes are associated with the provisions of public services, mitigation in **Section 4.0** would be implemented to provide financial compensation for the increase in service calls to the Project Site (further discussed below). **Less than significant impact with mitigation.**
- **Public Safety:** Alternative A would result in a modest increase in service calls related to police, fire protection, and emergency medical services, consistent with demand typically generated by similar commercial developments. Crime rates are not anticipated to increase disproportionately. To address potential impacts on public safety resources, mitigation in **Section 4.0** would be implemented that addresses coordination with service providers to ensure adequate coverage and to provide financial compensation for the increase in service calls to the Project Site. **Less than significant impact with mitigation.**
- **Housing and Growth:** Alternative A could include multi-family housing, similar to other mixed-use commercial development, though the overall development would remain commercial and thus is not anticipated to create over supply. Alternative A would not extend utilities or roadways into undeveloped areas. **Less than significant impact with no mitigation.**

Alternative B

Under Alternative B, no development would occur, and the Project Site would remain in its current state and continue contributing to County property tax revenue. **No impact.**

3.7 Transportation and Circulation

Detailed information on roadways, bicycle and pedestrian facilities, and transit service is provided in **Appendix C7**.

3.7.1 Environmental and Regulatory Setting

Regional access to the Project Site is provided from SR-99 by the Grant Line Road interchange and Kammerer Road. Additional regional access to the Project Site includes less direct routes from SR-99 and I-5 via Elk Grove Boulevard, West Stockton Boulevard, Hood Franklin Road, Bruceville Road, Poppy Ridge Road, and Kammerer Road. Local access to the Project Site is currently provided through existing driveway stubs that were previously constructed as part of buildout of the Lent Ranch SPA circulation network. These driveway stubs are located along Promenade Parkway, Lent Ranch Parkway, Kammerer Road, Bilby Road, and Kyler Road. Relevant transportation regulations and planning policies are contained within the Elk Grove General Plan, Chapter 6 Mobility.

3.7.2 Impacts

The following provides a summary of potential effects on transportation and circulation for each alternative. Detailed information regarding impacts can be found in **Appendix C7**.

Alternative A

- **Construction Traffic:** Construction would generate additional temporary trips for workers and material hauling. A BMP addressing safety and vehicle delay during construction activities has been included as part of Alternative A (**Appendix B**). **Less than significant impact with no mitigation.**
- **Operational Traffic:** Alternative A would result in trip generation below that identified in the Lent Ranch Marketplace EIR for the same parcels. However, the Lent Ranch Marketplace EIR identified traffic mitigation measures and since that time regional transportation projects have been planned to address anticipated increases in traffic. Traffic improvements are funded in part by developer impact fees and/or sales tax, which would not be applicable to trust land. Therefore, mitigation has been included in **Section 4.0** such that the Tribe shall amend its existing MOU with the City of Elk Grove to address fair-share payment(s) to reduce such impacts. **Less than significant impact with mitigation.**
- **Bicycle, Pedestrian, and Transit Networks:** Alternative A would not generate a large number of new pedestrian trips, bicycling activity, or transit riders. New bicycle, pedestrian, and transit trips generated by Alternative A could be safely accommodated on existing facilities that have been developed as part of the Lent Ranch SPA in anticipation of plan area build-out. Transit and active transportation networks would not be degraded. **Less than significant impact with no mitigation.**

Alternative B

Under Alternative B, no development would occur, and the Project Site would remain in its current state. **No impact.**

3.8 Land Use

Detailed information on land use, including applicable regulations, surrounding designations, agricultural classifications, and compatibility considerations, is provided in **Appendix C8**.

3.8.1 Environmental and Regulatory Setting

The Project Site is located in the City of Elk Grove in Sacramento County. The City limits are located along the Project Site southern boundary and land to the south is within unincorporated Sacramento County. The site is primarily ruderal/developed and agricultural (hay crop) and there are no existing buildings. The City General Plan designates the Project Site as Regional Commercial, Employment Center, Transect 3, Transect 3R, and Transect 4, and a small area for Parks and Open Space as shown in Figure 9 of **Appendix A**. The Transects provide land for neighborhood uses including a diverse mix of residential and commercial uses. Surrounding land use designations within the City and County include Tribal Trust Lands, Employment Center, Regional Commercial, Light Industrial, Medium and Low Density Residential, Transect 3, Transect 3R, Transect 4, and Agricultural Cropland. The Project Site is located within and zoned Lent Ranch SPA (Figure 8 of **Appendix A**). Surrounding zoning within the City and County includes Lent Ranch SPA, Shopping Center, Light Industrial, Liveable Employment Area SPA, Low Density Residential, Medium Density Residential, Open Space and Agricultural. The nearest airstrips to the site are located at Franklin Field, approximately 5.5 miles southwest, and Sky Way Estates Airport, approximately 7.8 miles northeast.

The Project Site contains soils that are classified as Farmland of Statewide Importance. The California Farmland Mapping and Monitoring Program (FMMP) classifies the entire Project Site as farmland of local importance. The Project Site is not under an active Williamson Act Contract. The Project Site is within an urban area as identified by the U.S. Census Bureau. Relevant regulations include the Farmland Protection Policy Act (FPPA), the Right to Farm Act (RTFA), the Williamson Act, the City of Elk Grove General Plan and Zoning Code, and the Lent Ranch SPA.

3.8.2 Impacts

The following provides a summary of potential effects on land use for each alternative. Detailed information regarding impacts can be found in **Appendix C8**.

Alternative A

- **Land Use Compatibility:** Consistent with the existing land use and zoning under City policies and the Lent Ranch SPA, and although City land use regulations would not apply, the proposed development is compatible with surrounding properties. **Less-than-significant impact with no mitigation.**
- **Agriculture:** Agricultural lands would be converted, but the site is considered within an urban area and exempt from the FPPA. **No Impact.**

Alternative B

Under Alternative B, no development would occur, and the Project Site would remain in its current state. **No impact.**

3.9 Public Services

Detailed information on public services, including applicable regulations, service provider data, and projected demand under each alternative, is provided in **Appendix C9**.

3.9.1 Environmental and Regulatory Setting

Water supply and treatment within Elk Grove, including the Project Site, is provided by SCWA. Existing water mains in the vicinity of the Project Site are located along Promenade Parkway. The City's Municipal Water System has sufficient supply through 2045, supported by an Urban Water Management Plan for the SCWA. The Project Site is within the SASD service area. The SASD is responsible for the collection, treatment, and disposal of wastewater throughout most of the urbanized areas of Sacramento County. The Project Site is within the LA Elk Grove Trunk Shed for the SASD, with gravity mains of at least 10 inches running along Promenade Parkway.

Solid waste services in the City are provided by private hauling companies through a franchise agreement and most waste is disposed of at Keifer Landfill. Natural gas service for the City of Elk Grove, including the Project Site, is supplied by PG&E. SMUD provides electrical services to the Project Site and region.

Law enforcement to the area is provided by the Elk Grove Police Department while fire protection is provided by the CCSD Fire Department. The Project Site is within the Elk Grove Unified School District. Nearby parks include Elk Grove Regional Park and the Cosumnes River Preserve.

Applicable regulations include the CWA, SDWA, Public Law 280, Senate Bill 1383, and Assembly Bill (AB) 939 for waste reduction, and local utility and emergency services planning documents.

3.9.2 Impacts

The following provides a summary of potential effects on public services for each alternative. Detailed information regarding impacts can be found in **Appendix C9**.

Alternative A

- **Water Supply:** The 2020 Urban Water Management Plan for SCWA projects long-term water reliability through 2045 and Alternative A is within the SPA development assumptions for the Project Site. The Tribe would pay for service accordingly and would coordinate connections and any extensions with SCWA. **Less than significant impact with no mitigation.**
- **Wastewater:** The 2020 SASD System Capacity Plan Update plans for sewer conveyance and treatment capacity to be available for projects within the current and future SASD service area, including Alternative A, which is within SPA development assumptions. The Tribe would pay the sewer impact fees and for service accordingly and would coordinate connections and any extensions with the SASD. **Less than significant impact with no mitigation.**
- **Solid Waste Service:** Solid waste generated from the construction of Alternative A would be temporary and therefore would not impact long-term capacity of local landfills or private hauling companies. Operation of Alternative A would increase the generation of solid waste compared to the existing undeveloped site but is within the development assumptions of the SPA and thus is not expected to reduce the expected life of landfill facilities. BMPs in **Appendix B** include the use of single-stream recycling and green waste diversion to the extent that it is available. **Less than significant impact with no mitigation.**
- **Electricity and Natural Gas:** The Tribe would pay for electrical and natural gas services accordingly. Extensions, if needed, would be coordinated with SMUD and PG&E. **Less than significant impact with no mitigation.**

- **Law Enforcement, Fire Protection, and Emergency Medical Services:** Alternative A would result in a minimal increase in demand due to the limited size and scope as well as the planned and anticipated buildout of the site. To reduce the probability of fire during construction, BMPs in **Appendix B** include keeping the work area clear of fire fuels, trash, and debris. Mitigation included in **Section 4.0** would ensure the Tribe would make good faith efforts to amend the existing MOU to address the potential increase in calls. **Less than significant impact with mitigation.**
- **Schools and Parks:** Alternative A is within the development assumptions of the adopted Lent Ranch SPA and primarily commercial in nature and thus is not anticipated to create unforeseen demand on local schools and parks. **Less than significant impact with no mitigation.**

Alternative B

Under Alternative B, no development would occur and the Project Site would remain in its current state. **No impact.**

3.10 Noise

Detailed information regarding noise conditions, analysis methodology, and applicable regulatory thresholds is provided in **Appendix C10**.

3.10.1 Environmental and Regulatory Setting

The dominant noise source near the Project Site is traffic on Highway 99, with additional contributions from Kammerer Road and nearby commercial development such as the Sky River Casino. The estimated ambient noise level in the area is approximately 65 A-weighted decibels (dBA) L_{eq} (equivalent continuous sound level) over a 24-hour period. Noise and vibration significance thresholds were evaluated using criteria from the Federal Highway Administration (FHWA), Federal Transit Administration (FTA), the City of Elk Grove General Plan, and the Elk Grove Municipal Code.

3.10.2 Impacts

The following provides a summary of potential effects on noise for each alternative. Detailed information regarding impacts can be found in **Appendix C10**.

Alternative A

- **Construction Noise:** Construction equipment could generate noise up to 89.8 dBA L_{eq} at the nearest sensitive receptor (a residential neighborhood) if the three loudest equipment are used simultaneously, which is located approximately 50 feet from the Project Site. This is under the FTA's residential threshold of 90 dBA. Activities would occur during allowable hours and would incorporate BMPs (listed in **Appendix B**) to reduce adverse effects, which include the use of quieter equipment where feasible and shielding where appropriate. **Less than significant impact with no mitigation.**
- **Construction Vibration:** Vibration from equipment such as vibratory rollers could exceed the human annoyance threshold but would not reach levels that could cause structural damage.

Mitigation measures listed in **Section 4.0** would be implemented to minimize vibration effects through equipment placement and coordination with nearby residents. **Less than significant impact with mitigation.**

- **Operational Noise and Vibration:** Operational noise would consist of typical commercial sounds (e.g., HVAC, parking lot activity, loading). Most project traffic would access the site from Highway 99, and volumes would not double existing traffic levels, which is the threshold needed to raise ambient noise levels by 3 dBA. The estimated ambient noise level of 65 dBA would not increase above the FHWA threshold of 67 dBA for residential receptors. No operational equipment or land uses would generate perceptible vibration. **Less than significant impact with no mitigation.**

Alternative B

Under Alternative B, no development would occur, and the Project Site would remain in its current undeveloped state. **No impact.**

3.11 Hazardous Materials

Detailed information on existing conditions, analysis, and applicable regulatory considerations is provided in **Appendix C11**.

3.11.1 Environmental and Regulatory Setting

A Phase I Environmental Site Assessment (ESA) was conducted for the Project Site in 2023, and included relevant database searches for hazardous material sites, waste generators, and above ground storage tanks and underground storage tanks; review of historical topographic maps and aerial photographs of the Project Site; and interviews with owners, operators, occupants, and/or local government officials to determine if Recognized Environmental Conditions (RECs) exist on the Project Site or within the vicinity. Site visits were conducted in June of 2023 and July of 2025. No RECs have been identified in connection with the Project Site.

Hazardous materials are regulated by USEPA and the U.S. Department of Transportation (USDOT), as well as regulations including, but not limited to, the: Resource Conservation and Recovery Act (RCRA); Federal Food, Drug, and Cosmetic Act; Hazard Communication Standard (HCS); Federal Hazardous Substance Act; and Toxic Substance Control Act (TSCA).

3.11.2 Impacts

The following provides a summary of potential effects related to hazardous materials for each alternative. Detailed information regarding impacts can be found in **Appendix C11**.

Alternative A

- **Hazardous Materials:** Typical quantities of hazardous materials would be used during construction; BMPs required through the NPDES Construction General Permit would limit or eliminate risk of accidental releases of hazardous materials (**Appendix B**). Common hazardous materials would be used during operation, but would be handled, stored, and disposed of according to federal guidelines. **Less-than-significant impact with no mitigation.**
- **Wildfire Risk:** Project Site is not within or near a fire hazard severity zone. Without a severity zone rating, the chance of wildfires during construction is possible, although unlikely.

The Project Site is undeveloped and routinely disked for hay production. Furthermore, BMPs would reduce the probability of igniting a fire. Alternative A would be designed to meet Tribal building standards, including measures related to fire and structural safety. **Less-than-significant impact with no mitigation.**

Alternative B

Under Alternative B, no development would occur, and the Project Site would remain in its current state. **No impact.**

3.12 Visual Resources

Detailed information on visual resources, including applicable design standards and key viewpoints, is provided in **Appendix C12**.

3.12.1 Environmental and Regulatory Setting

The Project Site contains limited defining natural visual characteristics. The Project Site is located within the Lent Ranch SPA and is not within the vicinity of any important visual resources or notable topographic features. Viewsheds are shown in Figure 10 of **Appendix A**. Relevant regulations include the Tribe's Building Code, which adopts standards at least as stringent as the California Energy Code (Title 24, Part 6) applicable to Sacramento County. The City of Elk Grove General Plan and the Lent Ranch SPA provide design policies and guidance but would not apply once the site is in trust.

3.12.2 Impacts

The following provides a summary of potential effects on visual resources for each alternative. Detailed information regarding impacts can be found in **Appendix C12**.

Alternative A

- **Visual Compatibility:** Commercial development under Alternative A would be generally consistent with surrounding land uses and the Lent Ranch SPA, which outlines growth and development for the Project Site. **Less than significant impact with no mitigation.**
- **Lighting and Glare:** BMPs listed in **Appendix B**, include shielding for exterior lighting and use of low-glare materials. Construction would adhere to the Tribe's Building Code, which adopts standards at least as stringent as the California Energy Code (Title 24, Part 6), as applicable to the County of Sacramento. The California Energy Code requires light pollution reduction measures for nonresidential development to limit backlight, uplight, and glare. Increases in ambient light would be consistent with surrounding development. **Less than significant impact with no mitigation.**

Alternative B

Under Alternative B, no development would occur, and the Project Site would remain in its current state. **No impact.**

3.13 Other Reasonably Foreseeable Impacts

As described in **Sections 3.1** through **3.12**, development would not result in significant impacts with the implementation of mitigation measures listed in **Section 4.0**. In considering the potentially affected environment, analysis must consider any connected actions, the scope of the affected area (national, regional, or local), reasonably foreseeable trends and planned actions within that area, and the affected area's natural and cultural resources (516 DM 1, Section 1.2(b)(1)). A list of reasonably foreseeable projects in the Project Site vicinity is included in **Appendix C13**. These projects and growth and development envisioned in the Lent Ranch SPA and City of Elk Grove General Plan were considered, as discussed in detail in **Appendix C13**, and no additional significant impacts were identified.

4.0 MITIGATION

Mitigation measures to address potentially significant impacts that could result from implementation of a federal action consist of the following:

- Avoiding the impact altogether by not taking a certain action or parts of an action.
- Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- Rectifying the impact by repairing, rehabilitating, or restoring the affected environment.
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- Compensating for the impact by replacing or providing substitute resources or environments.

Mitigation measures to be implemented during construction and operation of Alternative A are summarized in the table below. Mitigation is enforceable because it is (1) inherent to the project design; and/or (2) required by federal or Tribal regulations. Additionally, in accordance with the Indian Affairs Manual; Part 59, Chapter 3.3(D), it is the policy of the BIA to:

- Take the appropriate steps to ensure negative environmental effects are prevented, minimized, or mitigated whenever possible.
- Monitor for and assess the effectiveness of mitigation measures identified to mitigate adverse environmental impacts in EAs.

Mitigation Measures

Resource Area	Proposed Mitigation
Cultural Resources	CUL-1: Inadvertent Discovery Protocols <u>Cultural Resources</u> ▪ In the event of inadvertent discovery of prehistoric or historic archaeological resources during construction-related activities, such finds shall be subject to Section 106 of the National Historic Preservation Act as amended (36 CFR 800), and the BIA and Tribal Historic Preservation Officer (THPO) shall be notified. Specifically, procedures for post-review discoveries without prior planning pursuant to 36 CFR 800.13 shall be followed.

Resource Area	Proposed Mitigation
	▪ Work within 50 feet of the find shall be halted until a professional archaeologist meeting the Secretary of the Interior’s qualifications (36 CFR 61) can assess the significance. ▪ If any find is determined to be significant by the archaeologist, then representatives of the Tribe shall meet with the archaeologist to determine the appropriate course of action, including the development of a treatment plan, if necessary. <u>Paleontological Resources</u> ▪ In the event of inadvertent discovery of paleontological resources during construction-related activities, such finds shall be subject to Section 101 (b)(4) of NEPA and the BIA and Tribe shall be notified. Work within 50 feet of the find shall be halted until a professional paleontologist can assess the significance. ▪ If the find is determined to be significant by the paleontologist, then representatives of the BIA and Tribe shall meet with the paleontologist to determine the appropriate course of action, including the development of an evaluation report and/or mitigation plan, if necessary. <u>Human Remains</u> ▪ If human remains are discovered during ground-disturbing activities, work within 100 feet of the find shall be halted. The THPO, BIA, and County Coroner shall be contacted immediately, and the County Coroner shall determine whether the remains are the result of criminal activity; if possible, a human osteologist should be contacted as well. ▪ If Native American, the provisions of the Native American Grave Protection and Repatriation Act (NAGPRA) shall apply to the treatment and disposition of the remains. ▪ Construction shall not resume in the vicinity until final disposition of the remains has been determined.
Socioeconomic Conditions	SOC-1: Public Safety Coordination The Tribe shall make good faith efforts to amend its existing MOUs or enter into new service agreements with the City of Elk Grove and the Cosumnes Community Services District Fire Department to ensure adequate provision of law enforcement, fire protection, and emergency medical services to the Project Site prior to occupancy.
Transportation and Circulation	TRA-1: Amend Memorandum of Understanding The existing MOU between the Tribe and City of Elk Grove shall be revised to address the appropriate fair-share contribution associated with added trips generated by the project. The Tribe or lessees shall set appropriate funds aside in a dedicated account to fund fair-share contributions toward future vicinity roadway maintenance and improvements.
Noise	NOI-1: Construction Vibration Measures To reduce vibration impacts during construction, the following measures shall be implemented: ▪ High-vibration stationary construction equipment shall be located as far from adjacent sensitive receptors as feasible, and equipment with reduced vibration output shall be used whenever possible, especially during work occurring within 50 feet of such receptors.

Resource Area	Proposed Mitigation
	▪ The Tribe shall monitor construction noise and vibration and will designate a disturbance coordinator (such as an employee of the general contractor or the project manager for the Tribe), post the coordinator's contact telephone number conspicuously around the Project Site, and provide the number to nearby sensitive receptors. The disturbance coordinator shall receive all public complaints, be responsible for determining the cause of the complaints, and implement any feasible measures to alleviate the problem.

5.0 CONSULTATION AND COORDINATION

5.1 Federal Agencies Consulted

- **Federal Emergency Management Agency:** The FEMA Map Service Center was utilized to review Flood Information Rate Maps.
- **Federal Transportation Administration:** FTA guidance manuals were consulted regarding transit noise and vibration standards.
- **U.S. Bureau of Labor Statistics:** Reviewed website to obtain labor statistics.
- **U.S. Census Bureau:** Reviewed website for information concerning demographical data.
- **U.S. Department of Agriculture Natural Resources Conservation Service (USDA NRCS):** Consulted website for data concerning farmland and soil characteristics information.
- **U.S. Environmental Protection Agency:** Reviewed website for information regarding National Ambient Air Quality Standards Attainment status.
- **U.S. Fish and Wildlife Service (USFWS):** Consulted to obtain a list of federally listed special-status species with the potential to occur in the vicinity of the Project Site. Additionally, the USFWS NWI was consulted to identify potential wetlands and waters in the vicinity of the Project Site. The BIA may initiate informal consultation with USFWS regarding the potential for the project alternatives to impact federally listed species in accordance with the FESA.
- **U.S. Geological Survey:** Reviewed website for information concerning geological and hydrological information in addition to geological hazards, such as volcanic information.

5.2 State Agencies Consulted

- **California Department of Conservation (DOC), California Geological Survey:** Reviewed website for geological information for the City of Elk Grove.
- **California Department of Forestry and Fire Protection (CAL FIRE):** Reviewed website for information concerning wildfire data within the State.
- **California Department of Toxic Substances Control (DTSC):** EnviroStor Database search for documentation of local hazardous materials.
- **California Department of Water Resources (DWR):** Website and publications were reviewed for information about local groundwater basins.
- **California Historical Resources Information System (CHRIS):** Consulted in order to obtain resource records and reports about specific cultural resources.

- **California Native Plant Society's (CNPS) database *Inventory of Rare and Endangered Plants of California*:** Online database was reviewed to obtain a list of rare and endangered plants of California.
- **California Natural Diversity Database (CNDDDB):** Online database was reviewed to obtain a list of threatened, endangered, and sensitive species with the potential to occur in the vicinity of the Project Site. The online database was also consulted to obtain maps of sensitive habitat and sensitive species' ranges.
- **California State Historic Preservation Officer (SHPO):** The California Office of Historic Preservation was consulted regarding the potential for the Proposed Project to impact cultural resources in accordance with Section 106 of the NHPA. The SHPO did not object to the BIA's finding of no historic properties affected in a letter dated March 18, 2026.
- **State Water Resources Control Board (SWRCB):** GeoTracker database was searched for documentation of local hazardous materials.
- **California Department of Resources Recycling and Recovery (CalRecycle):** Website was reviewed to obtain solid waste numbers by land use.
- **Native American Heritage Commission (NAHC):** A record search of the NAHC Sacred Lands File, and list of Native American tribes who may also have knowledge of cultural resources in the project area was conducted.

5.3 Local Agencies and Service Providers

- **City of Elk Grove:** The City website, reports, and planning documents, such as the General Plan, were consulted for information regarding numerous environmental topics, such as land use, public services, taxes, reasonably foreseeable projects, and land use/zoning.
- **Cosumnes Community Service District Fire Department:** Website was reviewed to obtain information on fire protection services in the Project vicinity (CCSD, 2025).
- **Sacramento County Water Agency:** Website and Urban Water Management Plan were reviewed to obtain information about the SCWA water supply and wastewater treatment systems.
- **Sacramento Area Sewer District:** Website was reviewed to obtain information about the SASD water supply and wastewater treatment systems.
- **Pacific Gas and Electric:** Website was reviewed to obtain information about PG&E services and gas capacity.
- **Elk Grove Unified School District:** Website was reviewed to obtain information about the schools in the Project vicinity.

6.0 PREPARERS

Name	Qualifications	Role
Acorn Environmental: Environmental Assessment, Biological Assessment		
Jennifer Wade	BA; 21 years of experience	Project Director; EA Author
Ryan Sawyer, AICP	BA; 21 years of experience	Principal; EA Author
Kt Alonzo	BS; 11 years of experience	Project Manager; EA Author
Josh Ferris	BA; 24 years of experience	Senior Environmental Analyst
Kristen Miner	BS, MS; 10 years of experience	Environmental Analyst

Name	Qualifications	Role
Katie Francisco	BS; 2 years of experience	Environmental Analyst
Kimberlina Gomez	BS; MS; 3 years of experience	Biologist
Dana Hirschberg	24 years of experience	GIS/Graphic Design
Kimley-Horn: Trip Generation Memorandum		
Curtis Yee	PE; 9 years of experience	Traffic Engineer
Pedro Cortes	BS; 3 years of experience	Civil Analyst
Wilton Rancheria Department of Cultural Preservation: Archaeological and Tribal Survey Report		
Michelle St. Clair	MA, RPA, 26 years of experience	Executive Director (meets SOI standards)
Abigail Bennett	MA, RPA, 10 years of experience	Project Archaeologist (meets SOI standards)

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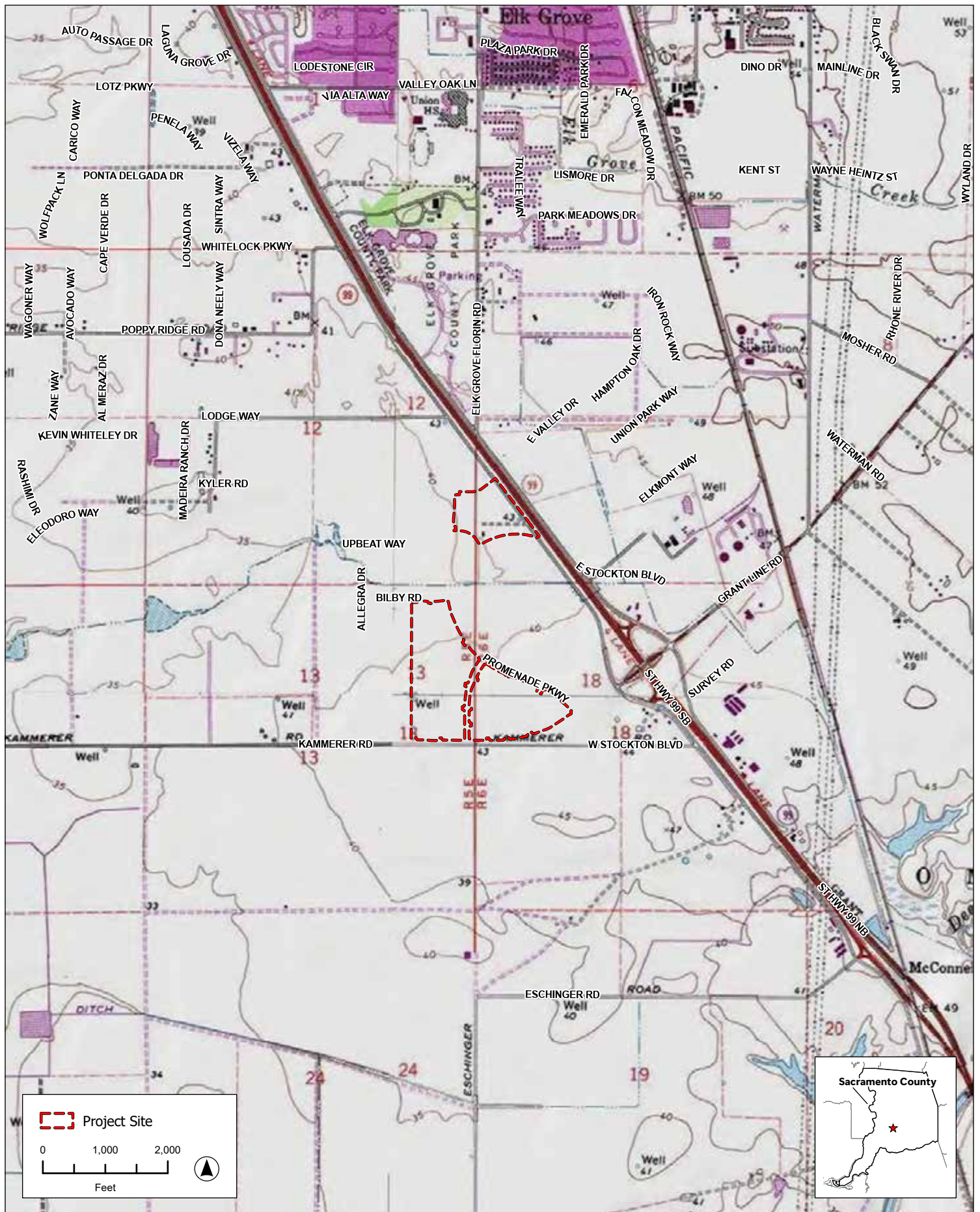
Appendix A

Figures



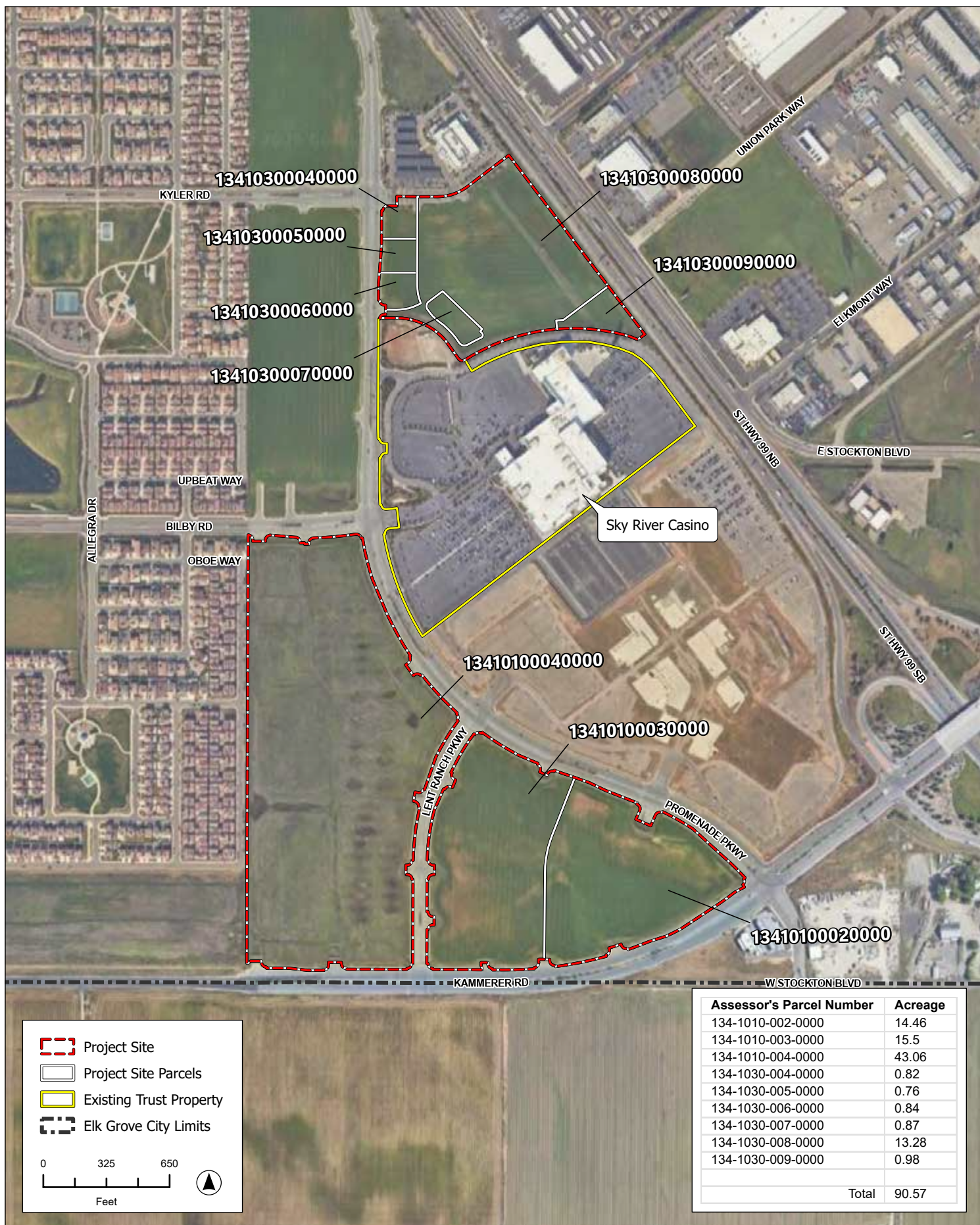
SOURCE: ESRI, 2025; City of Elk Grove GIS, 2024; Google Earth Aerial Photograph, 3/17/2024; Acorn Environmental, 9/3/2025

Figure 1
Regional Location



SOURCE: "Elk Grove, CA" & "Galt, CA" USGS 7.5 Minute Topographic Quadrangles, T6N R5E & T6N R 6E, Sections 7, 12, 13, & 18, Mt. Diablo Baseline & Meridian; ESRI, 2025; Acorn Environmental, 9/3/2025

Figure 2
Site and Vicinity



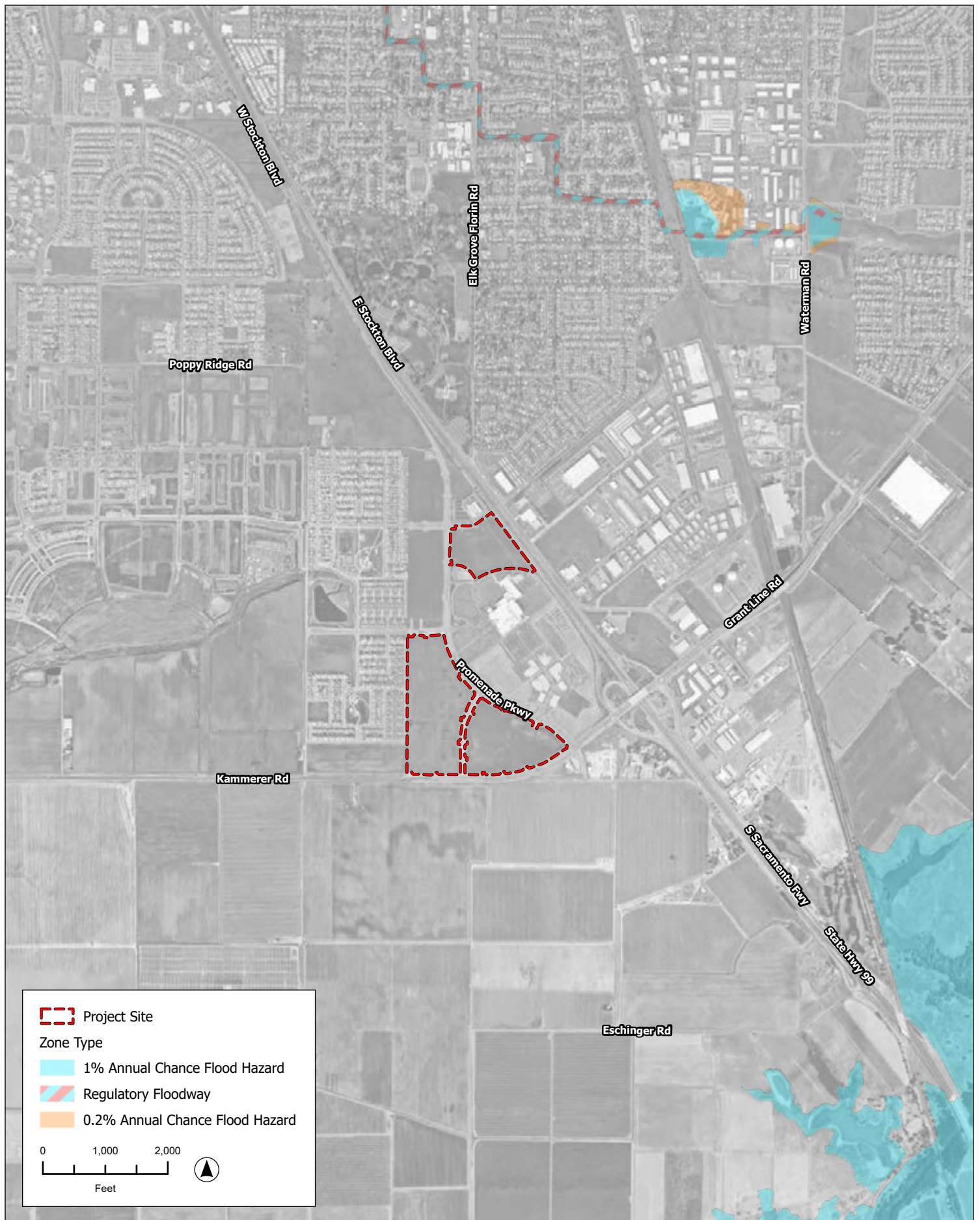
SOURCE: ESRI, 2025; City of Elk Grove GIS, 2024; Google Earth Aerial Photograph, 3/17/2024;
Acorn Environmental, 9/10/2025

Figure 3
Aerial Photograph



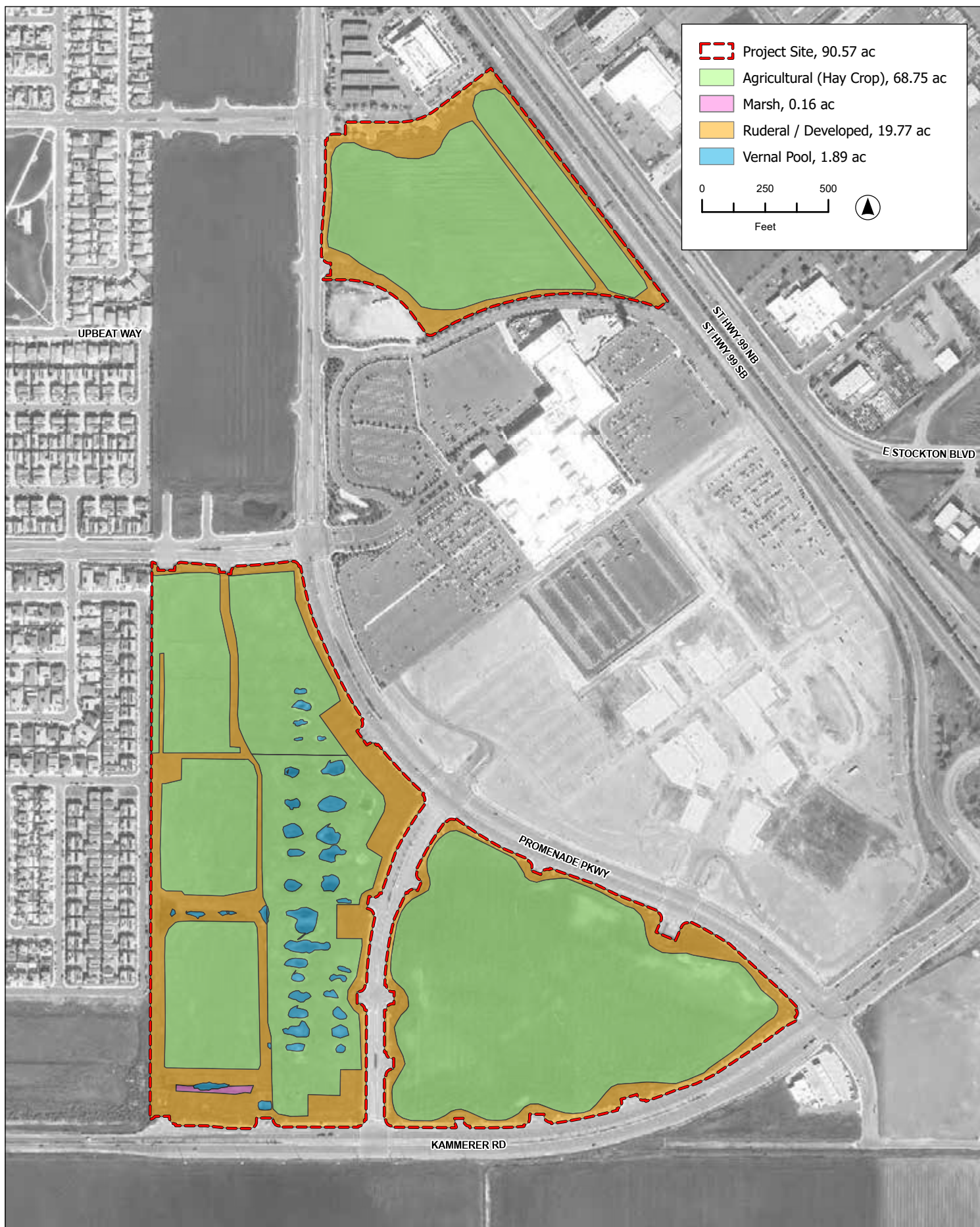
SOURCE: ESRI, 2025; City of Elk Grove GIS, 2024; Google Earth Aerial Photograph, 3/17/2024; Acorn Environmental, 9/10/2025

Figure 4
Preliminary Site Plan



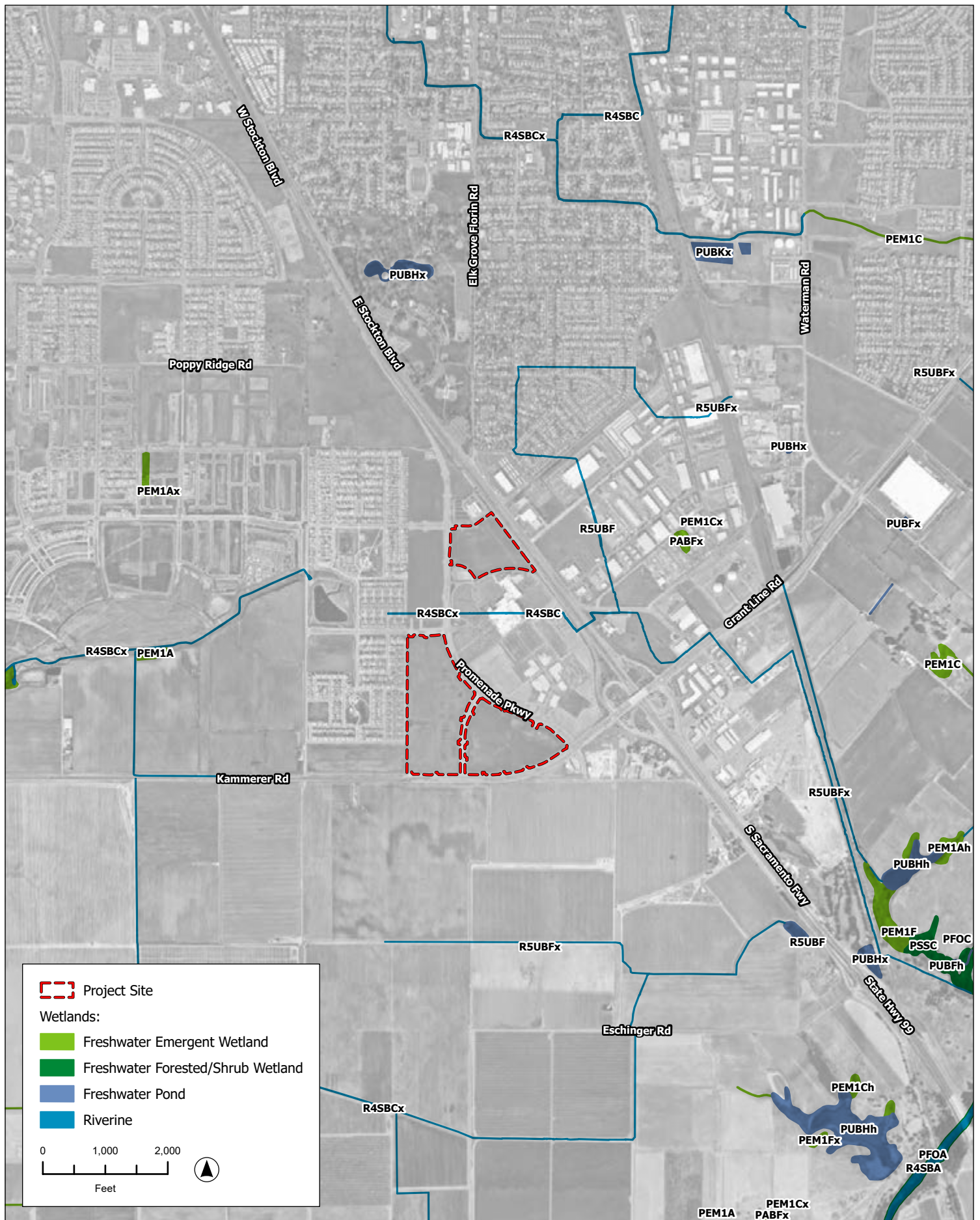
SOURCE: NFHL, 7/23/2024; ESRI, 2025; Google Earth Aerial Photograph, 3/17/2024; Acorn Environmental, 9/3/2025

Figure 5
FEMA Flood Types



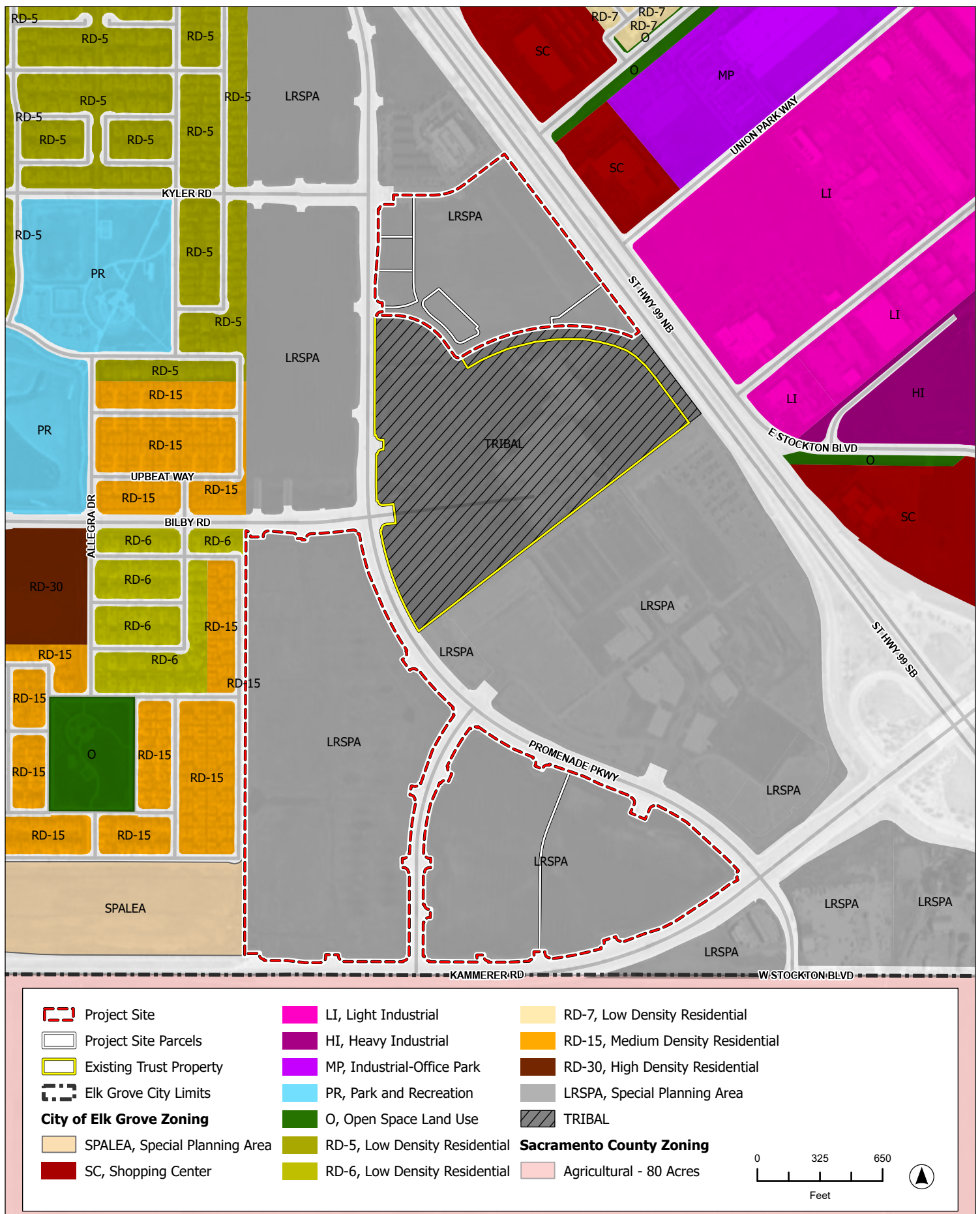
SOURCE: ESRI, 2025; City of Elk Grove GIS, 2024; Google Earth Aerial Photograph, 3/17/2024; Acorn Environmental, 9/3/2025

Figure 6
Habitat Types



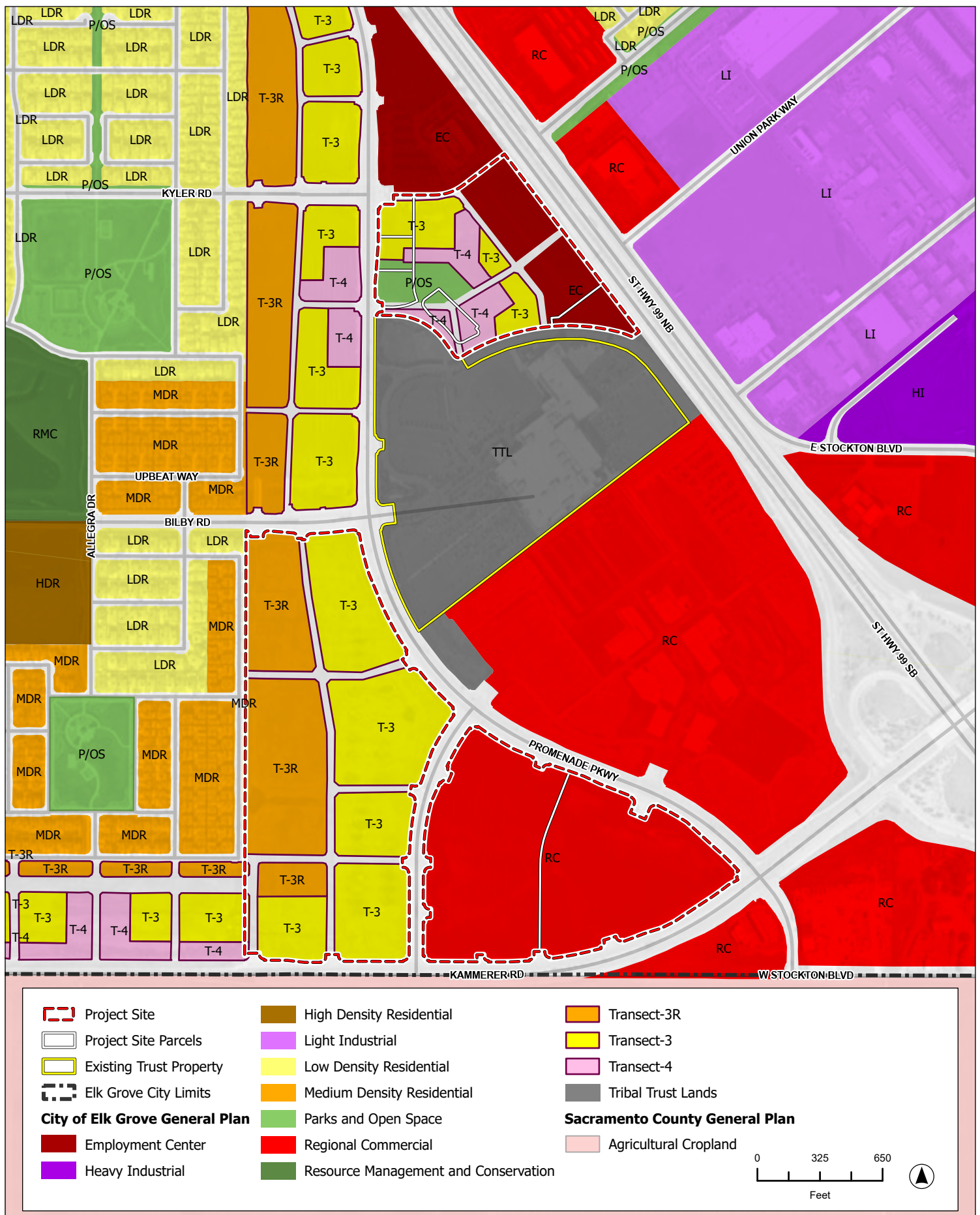
SOURCE: USFS, 5/7/2025; ESRI, 2025; Google Earth Aerial Photograph, 3/17/2024; Acorn Environmental, 9/3/2025

Figure 7
National Wetlands Inventory



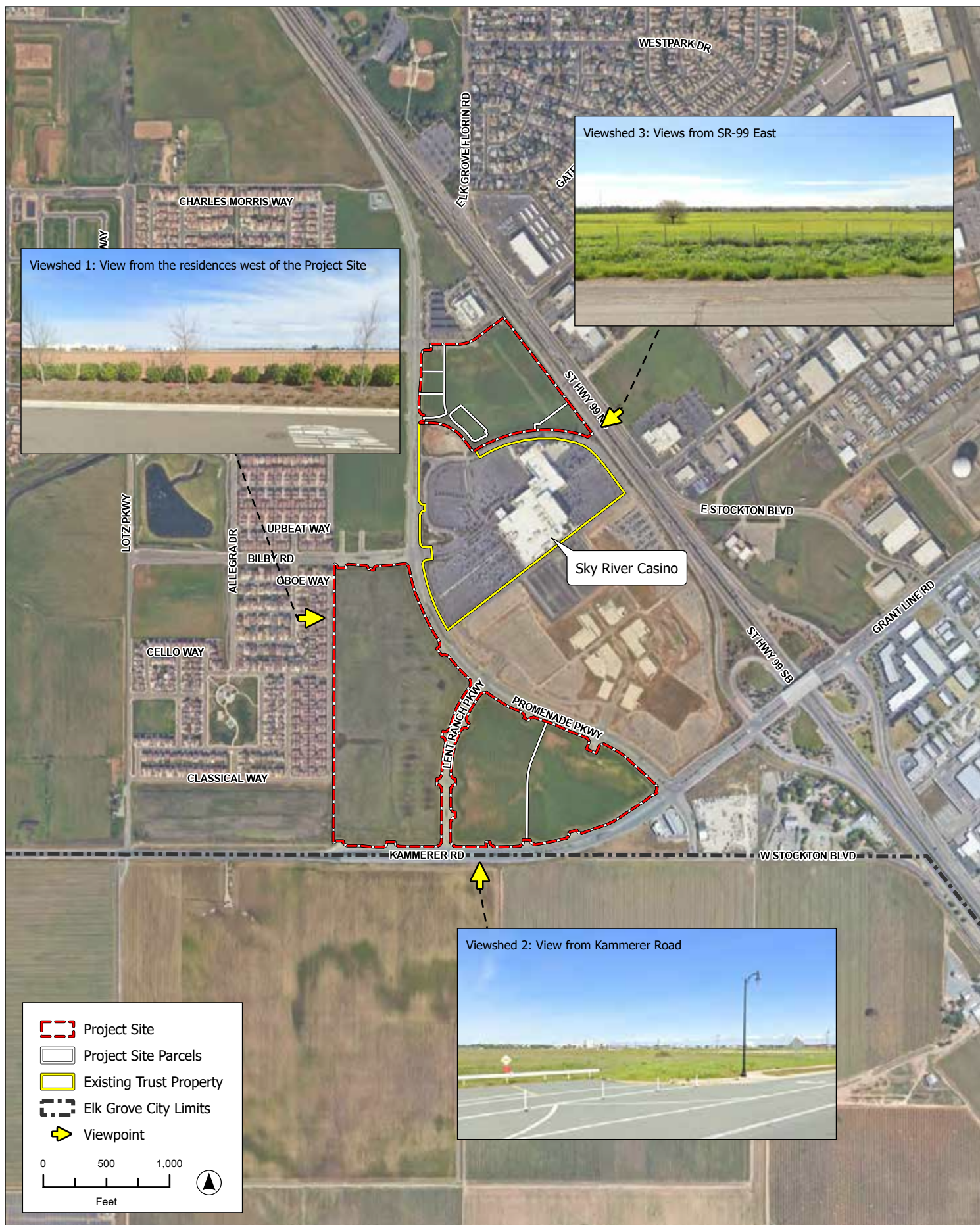
SOURCE: ESRI, 2025; City of Elk Grove GIS, 2025; Google Earth Aerial Photograph, 1/6/2024; Acorn Environmental, 9/10/2025

Figure 8
Zoning Designations



SOURCE: ESRI, 2025; City of Elk Grove GIS, 2025; Google Earth Aerial Photograph, 1/6/2024; Acorn Environmental, 9/10/2025

Figure 9
General Plan Land Use Designations



SOURCE: ESRI, 2025; City of Elk Grove GIS, 2024; Google Earth Aerial Photograph, 3/17/2024; Acorn Environmental, 9/10/2025

Figure 10
Viewshed Photographs

Appendix B: Best Management Practices and Design Features

Best Management Practices and Design Features

Protective measures and best management practices (BMPs), including regulatory requirements and voluntary measures that would be implemented by the Tribe, have been incorporated into the design of Alternative A. Where applicable, these measures will be incorporated into design contracts, construction contracts, and/or lease agreements. These measures are discussed below.

Protective Measures and Best Management Practices

Resource Area	Protective Measures and Best Management Practices
Land and Water Resources	The following BMPs shall be implemented during construction: ▪ Coverage under the National Pollutant Discharge Elimination System Construction General Permit shall be obtained to address stormwater during the construction phase in compliance with the Clean Water Act (CWA). ▪ A Stormwater Pollution Prevention Plan (SWPPP) shall be prepared, implemented, and maintained throughout the construction phase of the development, consistent with the Construction General Permit requirements. ▪ The SWPPP prepared for the Project Site shall include, but not be limited to, the following BMPs to minimize storm water effects to water quality during construction: ○ Construction activities shall be scheduled to minimize land disturbance during peak runoff periods. ○ Silt fencing shall be placed around aquatic features and the perimeter of the work area, excluding roadways. ○ Temporary erosion control measures (such as silt fences, fiber rolls, staked straw bales, temporary re-vegetation, erosion control blankets, and/or sediment traps) shall be employed for disturbed areas. ○ Grading activities shall be limited to the area required for construction. ○ Disturbed areas shall be paved or re-vegetated following construction activities. ○ A spill prevention and countermeasure plan shall be developed that identifies proper storage, collection, and disposal measures for potential pollutants (such as fuel, fertilizers, pesticides, etc.) used on site. ○ Petroleum products shall be stored, handled, used, and disposed of properly in accordance with provisions of the CWA (33 USC § 1251 to 1387). ○ Construction materials, including topsoil and chemicals, shall be stored, covered, and isolated to prevent runoff losses and contamination of surface and groundwater. ○ Fuel and vehicle maintenance areas shall be designed to control runoff.

Resource Area	Protective Measures and Best Management Practices
	○ Sanitary facilities shall be provided for construction workers. ▪ Landscaping shall consist of native drought-tolerant vegetation to the extent feasible.
Air Quality	The following BMPs shall be implemented during construction to suppress dust: ▪ Exposed construction surfaces shall be watered daily as needed. These areas include, but are not limited to soil piles, graded areas, unpaved parking areas, staging areas, and access roads. ▪ At least two feet of free board space shall be covered/maintained 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 shall be covered. ▪ Wet power vacuum street sweepers shall be used to remove any visible track out mud or dirt onto adjacent public roads at least once a day. Dry powered sweeping shall be prohibited. ▪ Vehicle speeds on unpaved roads shall be limited to 15 miles per hour. ▪ Paving of roadways, driveways, sidewalks, and parking lots shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. ▪ Idling time shall be minimized by shutting equipment off when not in use or by reducing the time of idling to five minutes. Clear signage that posts this requirement for workers shall be provided at the entrances to the site. ▪ Construction equipment shall be maintained in proper working condition according to manufacturer's specifications. The equipment shall be checked by a certified mechanic and determined to be running in proper condition before it is operated. The following BMPs shall be implemented during operation to reduce criteria air pollutants (CAPs): ▪ Twenty percent of parking spaces shall be constructed as electric vehicle (EV) capable spaces. Twenty-five percent of the EV capable spaces shall be provided with EV supply equipment (i.e., chargers). ▪ Energy efficient lighting and appliances shall be used, which would reduce energy usage, thus reducing indirect CAPs. ▪ Water consumption shall be reduced through low-flow appliances, drought resistant landscaping, and the incorporation of "Save Water" signs near water faucets. ▪ Recycling bins shall be installed throughout the office and community facilities for glass, cans, and paper products. Trash and recycling receptacles shall be placed strategically outside to encourage recycling.
Biological Resources	The following BMPs shall be implemented during construction: ▪ If construction activities commence during the general nesting season (February 1 to September 1), a preconstruction nest survey shall be conducted within the proposed development area within 7 days of initiating ground disturbance. ○ If active nests are identified, a qualified biologist shall determine a suitable avoidance buffer based on the needs of the species observed. The buffer shall be established using construction fencing, flagging, or

Resource Area	Protective Measures and Best Management Practices
	similar. The buffer shall remain in place until the biologist has determined the nest is no longer active. See also Land and Water Resources BMPs above, particularly that <i>Silt fencing shall be placed around aquatic features and the perimeter of the work area, excluding roadways.</i>
Transportation and Circulation	The following BMPs shall be implemented during construction: ▪ A traffic management plan shall be prepared in accordance with standards set forth in the Manual on Uniform Traffic Control Devices for Streets and Highways (FHWA, 2023). The traffic management plan shall be submitted to each affected local jurisdiction and/or agency. ▪ Prior to construction, the contractor shall coordinate with emergency service providers as necessary to avoid obstructing emergency response service. Police, fire, ambulance, and other emergency response providers shall be notified in advance of the details of the construction schedule, location of construction activities, duration of the construction period, and any access restrictions that could impact emergency response services. ▪ Flagging, performed in consultation with the California Highway Patrol, California Department of Transportation, Elk Grove Police Department, and/or the Sacramento County Sheriff's Department, shall be provided when necessary to assist with construction traffic control. ▪ To the extent feasible, transport of construction material shall be scheduled outside of the area-wide commute peak hours. ▪ To the extent feasible, lane closures or obstructions associated with construction of the project shall be limited to off-peak hours to reduce traffic congestion and delays.
Public Services and Utilities	The following BMPs shall be implemented during construction: ▪ Staging areas, welding areas, or areas slated for development using spark-producing equipment shall be cleared of dried vegetation or other materials that could serve as fire fuel. ▪ The Project Site shall be cleaned daily of trash and debris to the maximum extent practicable. The following BMPs shall be implemented during operation: ▪ Single-stream recycling and green waste diversion shall be encouraged to the extent feasible.
Noise	The following BMPs shall be implemented during construction: ▪ Construction activities involving noise-generating equipment shall be limited to the hours between 7:00 a.m. and 7:00 p.m. to the extent feasible. ▪ Construction equipment powered by internal combustion engines shall be properly muffled and maintained. ▪ Quiet construction equipment, particularly air compressors, shall be selected whenever possible. ▪ Stationary noise-generating construction equipment such as generators or air compressors shall be located as far as is practical from existing residences. In addition, stationary construction equipment shall be placed

Resource Area	Protective Measures and Best Management Practices
	such that emitted noise is directed away from sensitive receptors nearest the Project Site. ▪ Unnecessary idling of internal combustion engines shall be prohibited. ▪ The construction contractor shall locate on-site equipment staging areas to maximize the distance between construction-related noise sources and noise-sensitive receptors nearest the Project Site during all project construction. The following BMPs shall be implemented during operation: ▪ Heating, ventilation, and air conditioning equipment shall be shielded to reduce noise.
Hazardous Materials	The following BMPs shall be implemented during construction for the safe filling and servicing of construction equipment and vehicles to reduce the potential hazardous material releases: ▪ Catch pans shall be placed under equipment to catch potential spills during servicing. ▪ Refueling shall be conducted only with approved pumps, hoses, and nozzles. ▪ Vehicle engines shall be shut down during refueling. ▪ No smoking, open flames, or welding shall be allowed in refueling or service areas. ▪ Refueling shall be performed away from bodies of water to prevent contamination of water in the event of a leak or spill. ▪ Service trucks shall be provided with fire extinguishers and spill containment equipment, such as absorbents. ▪ Should a spill contaminate soil, the soil shall be put into containers and disposed of in accordance with local, state, and federal regulations. ▪ All containers used to store hazardous materials shall be inspected at least once per week for signs of leaks or potential failure. The following BMPs shall be implemented during operation: ▪ No smoking, open flames, or welding shall be allowed in refueling or service areas. ▪ Service trucks shall be provided with fire extinguishers.
Visual Resources	The following BMPs shall be implemented during operation: ▪ Exterior lighting shall be downcast, shielded, and limited to the extent needed for public safety. ▪ Landscaping shall be consistent with existing surroundings to the extent feasible. ▪ Glass used in building facades shall be anti-reflective or treated with an anti-reflective coating to minimize glare as needed.

Appendix C: Supporting Environmental Setting and Analysis Information

C1 LAND RESOURCES

C1-1 Regulatory Setting

C1-1.1 Federal

Clean Water Act

The CWA prohibits sediment and erosion discharge into navigable waters of the United States and establishes water quality goals. For land held in trust, the USEPA requires obtaining coverage under the NPDES Construction General Permit if a project disturbs one or more acre of soil, as well as preparation of a SWPPP.

C1-1.2 State and Local

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act (Alquist-Priolo Act; formerly the Alquist-Priolo Special Studies Zone Act), signed into law December 1972 after the 1971 San Fernando earthquake, requires the delineation of zones along active and potentially active faults in California. The California Geological Survey (CGS) defines an “active” fault as one that exhibits evidence of activity during the last 11,000 years. Faults that exhibit evidence of Quaternary activity (within the last 1.6 million years) are considered to be “potentially active.”

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act was enacted in 1990 to protect the public from the effects of strong ground shaking, liquefaction, landslides, ground failure, or other hazards caused by earthquakes. This act requires a State geologist to delineate various seismic hazard zones and requires cities, counties, and other local permitting agencies to regulate certain development projects within the portions of those zones where they have jurisdiction.

Surface Mining and Reclamation Act

The Surface Mining and Reclamation Act of 1975 requires jurisdictions to incorporate mapped mineral resources designations approved by the California Mining and Geology Board within their general plans. The Surface Mining and Reclamation Act was enacted to limit new development in areas with significant mineral deposits.

City of Elk Grove General Plan

The City of Elk Grove General Plan Community and Resource Protection Element outlines the County’s goals and policies related to natural resources, including minimizing risks from geologic and seismic hazards.

Lent Ranch Marketplace Special Planning Area

The City of Elk Grove approved the Lent Ranch SPA after environmental review in 2001 and its amendments in 2014. The SPA outlines goals for the planning area, including the goal to promote development in a cohesive manner and to minimize direct impacts to natural resources.

Wilton Rancheria Building and Safety Code

The Wilton Rancheria Building and Safety Code of 2019 (Title 5, Chapter 3 of the Wilton Rancheria Code) provides for the regulation of construction, repair, maintenance, expansion, modification, or renovation of all structures on Tribal land in order to ensure that all such activities are conducted in a safe manner to protect persons, property, and the Tribe. The Code adopts the California Building Code and the California Public Safety Code applicable to the County of Sacramento, inclusive of the codes for building, electrical, energy, mechanical, plumbing, fire, and safety, as set forth in Titles 19 and 24 of the California Code of Regulations (CCR).

C1-2 Environmental Setting

Geology and Topography

The Project Site is situated in Elk Grove, Sacramento County within the Sacramento Valley, which is within the Great Valley Geomorphic Province (Great Valley). The Great Valley is a relatively flat alluvial plain that is comprised of thick sequences of sedimentary deposits of Jurassic through Holocene age (CGS, 2002). The Project Site is relatively flat with little variation in topography, and portions have been mass graded and used for agriculture.

Seismic Conditions

A fault is a fracture in the Earth's crust that is accompanied by displacement between the two sides of the fault. An active fault is a fracture that has shifted in the last 10,000 to 12,000 years or in the Holocene Period, a potentially active fault is one that has been active in the past 1.6 million years or in the Quaternary Period.

The City of Elk Grove, including the Project Site, is not within an Alquist-Priolo Earthquake Fault Zone (CGS, 2025). The nearest faults to the Project Site include segments of the Foothills (26 miles southeast) and Midland (approximately 25 miles west) fault zones (USGS, 2025a). While the region generally experiences little seismic activity, it could be impacted by ground shaking originating in areas that experience greater seismic activity.

Soil Types and Characteristics

Soils mapped by NRCS within the Project Site include (ordered from highest to lowest coverage):

- San Joaquin silt loam, leveled, 0 to 1 percent slopes
- San Joaquin-Galt complex, leveled, 0 to 1 percent slopes
- Galt clay, leveled, 0 to 1 percent slopes

Soils within the Project Site are more than 70% San Joaquin silt loams (0 to 1 percent slopes and leveled) (NRCS, 2025). Hydric soils are defined as soils that formed under conditions of saturation, flooding, or ponding long enough during the growing season to develop anaerobic conditions in the upper part of the soil. Drainage class is a measure of the frequency and duration of wet periods under conditions similar to those in which the soil developed. Soils within the Project Site are not hydric and are moderately well-drained (NRCS, 2025).

Corrosivity pertains to a soil-induced electrochemical or chemical action that corrodes concrete or steel. Soils on the Project Site exhibit a high risk of corrosion to steel and a low risk of corrosion to concrete (NRCS, 2025). Expansive soils are largely comprised of clays, which may increase in volume when water is absorbed and shrink when dried; this property is measured using linear

extensibility. Soils within the Project Site have varying linear extensibility ratings, but the majority are rated low, and therefore soils have a low shrink-swell potential (NRCS, 2025). The eastern half of the northern parcel has a high linear extensibility rating and therefore may have a higher shrink-swell potential than the rest of the Project Site.

Soil Hazards

Soil erosion is the wearing and removal of soil from the ground surface and the transportation of soil resulting in deposition elsewhere. Mechanisms of soil erosion include stormwater runoff and wind as well as human activities. Soil erosion hazard areas include those areas with slopes of 20 percent or greater and that are classified as having severe or very severe erosion potential by the USDA NRCS. The soil erosion hazard throughout the Project Site is considered to be moderate (NRCS, 2025).

Liquefaction occurs when loose, saturated, and relatively cohesionless soil deposits temporarily lose strength from seismic shaking. Liquefaction occurs where groundwater is less than 50 feet below the surface. Liquefaction is a potential seismic hazard in much of Sacramento County due to the presence of water-saturated soils, although as discussed above, the Project Site is not located in a seismic hazard zone and has low liquefaction potential for the region (CGS, 2025). Based on soil borings conducted for the Lent Ranch Marketplace EIR, soils identified within the Project Site do not pose a risk for liquefaction due to the depth of the groundwater and the nature of the soils present (City of Elk Grove, 2000).

Areas susceptible to landslides are comprised of weak soils on sloping terrain. Landslides can be induced by weather or other conditions, such as heavy rains or strong seismic shaking events. According to the USGS Landslide Hazards Program, the Project Site is located within an area designated as having a very low landslide potential (USGS, 2025b).

Mineral Resources

The CGS Special Report 245 reports the Project Site within MRZ-3, an area containing known or inferred concrete aggregate resources of undetermined mineral resource significance (CGS, 2018). A search of the USGS Mineral Resources Data System showed a borrow pit located approximately 1.5 miles north of the Project Site, but no known mineral resources were identified within the Project Site. Additional prospects/ occurrences (Sacramento County Pit, Preston Hanford Sand and Gravel, Wilton Pit, and Hanford Pit) have been identified within two miles of the Project Site (USGS, 2025c). The Lent Ranch Marketplace EIR determined that impacts related to mineral resources on the Project Site would not be significant.

C1-3 Impact Assessment

C1-3.1 Assessment Criteria

Impacts to land resources would be significant if development were to result in changes to the topography or soils such that it caused significant impacts, such as severe erosion, landslides, or liquefaction. Seismic effects would be considered significant if development were to substantially increase the occurrence of seismic events or increase human risks associated with seismic events. Mineral resources would be impacted if development were to significantly reduce the regional availability of commercial mineral resources or increase the cost of extracting mineral resources.

C1-3.2 Alternative A – Proposed Project

Geology and Topography

Topography on the Project Site is mostly level. Construction of Alternative A would involve minimal grading and earthwork as well as balanced cut and fill. The changes in topography due to grading activities would not equate to a major change in the existing topography. Therefore, impacts would be less than significant and no mitigation measures are warranted.

Seismic Conditions

Construction would adhere to the Tribe's Building Code, which adopts standards at least as stringent as the California Building Code and the California Public Safety Code applicable to the County of Sacramento. The standards require implementation of appropriate development techniques and materials to reduce the potential risk of structure damage such that human risks would be reduced. Therefore, impacts would be less than significant and no mitigation measures are warranted.

Soil Hazards

Grading activities during construction could result in increased erosion and soil hazard risks. However, grading and earthwork would be minimal due to the relatively flat topography within the Project Site. Erosion risks would be addressed through BMPs listed in **Appendix B**, which include obtaining coverage under the NPDES Construction General Permit and implementation of a SWPPP with standard erosion and sedimentation control BMPs. Therefore, impacts would be less than significant and no mitigation measures are warranted.

Mineral Resources

There are no significant known mineral resources within the Project Site. Therefore, there would be no impact on mineral resources and no mitigation measures are warranted.

C1-3.3 Alternative B – No Action

Under the No Action alternative, there would be no development on the Project Site. The Project Site would remain as it is, and land resources would not be adversely impacted. Any future development of the Project Site would be required to adhere to local, state, and federal ordinances and planning documents.

C1-4 Mitigation Measures

There are no mitigation measures for land resources.

C2 WATER RESOURCES

C2-1 Regulatory Setting

C2-1.1 Federal

Executive Order 11988

EO 11988 requires federal agencies to avoid to the extent possible the long and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative. Specifically, EO 11988 states that agencies shall first determine whether the proposed action will occur in a floodplain. EO 11988 defines a floodplain as an area that has a one percent or greater chance of flooding in any given year. Second, if an agency proposes to allow an action to be located in a floodplain, the agency shall consider alternatives to avoid adverse effects and incompatible development in the floodplains. If the only practicable alternative action requires siting in a floodplain, the agency shall minimize potential harm to or within the floodplain.

Clean Water Act

CWA (33 USC § 1251-1376), as amended by the Water Quality Act of 1987, is the major federal legislation governing water quality. The objective of the CWA is “to restore and maintain the chemical, physical, and biological integrity of the Nation’s waters.” The USEPA is delegated as the administrative agency under the CWA. Relevant sections of the CWA are as follows.

- Sections 303 and 304 provide for water quality standards, criteria, and guidelines. Section 303(d) requires states to identify impaired off-Reservation water bodies, rank these impaired bodies based on severity of contamination and uses for the waters, and develop water quality management strategies, usually in the form of total maximum daily loads for the contaminant(s) of concern.
- Section 401 (Water Quality Certification) requires an applicant for any federal permit that proposes an activity that may result in a discharge to Waters of the U.S., to obtain certification from the USEPA for on-trust land activities, or the state for off-Reservation activities, that the discharge will comply with other provisions of the CWA.
- Section 402 establishes the NPDES, a permitting system for the discharge of any pollutant (except for dredged or fill material) into Waters of the U.S. Each NPDES permit contains limits on concentrations of pollutants discharged to surface waters to prevent degradation of water quality and protect beneficial uses.

The Federal Antidegradation Policy was adopted as part of the 1972 amendments to the CWA. Federal policy (CFR, Title 40, Part 131.12) specifies that each state must develop, adopt, and retain an anti-degradation policy to protect the minimum level of off-Reservation surface water quality necessary to support existing uses. Each state must also develop procedures to implement the anti-degradation policy through water quality management processes. Each state anti-degradation policy must include implementation methods consistent with the provisions outlined in 40 CFR § 131.12. On trust land, these issues are addressed by the USEPA.

General NPDES Permit for Construction

In 1990, an amendment to the CWA directed the NPDES permitting program to address non-point source pollution from construction activities. Construction activities include clearing, grading, excavation, stockpiling, and reconstructing existing facilities involving removal and replacement of existing foundations or other hardscapes. Construction projects disturbing one or more acres of soil must be covered under the NPDES Construction General Permit process. For tribal projects on land held in trust by the federal government, the Tribe proposing the project must apply for coverage under the USEPA's NPDES Construction General Permit. Project proponents are required to submit to the USEPA a complete Notice of Intent (NOI) to comply with the permit. A complete NOI package consists of an NOI form, site map, and fee. The USEPA's NPDES Construction General Permit also requires the development and implementation of a SWPPP. The SWPPP contains a site map showing the construction site perimeter, existing and proposed buildings, lots and roadways, stormwater collection and discharge points, general topography both before and after construction, and drainage patterns across the site. The SWPPP must list BMPs that will be implemented during construction and operation to address stormwater runoff rates and quality. SWPPP BMPs include the following categories:

- Site planning considerations, such as preservation of existing vegetation;
- Vegetation stabilization through methods such as seeding and planting;
- Physical stabilization through use of dust control and stabilization measures;
- Diversion of runoff by utilizing earth dikes and temporary drains and swales;
- Velocity reduction through measures such as slope roughening/terracing; and
- Sediment trapping/filtering through use of silt fences, straw bales and sand bag filters, and sediment traps and basins.

Safe Drinking Water Act

Under the mandate of the SDWA, the USEPA sets legally enforceable National Primary Drinking Water Regulations (primary standards) that apply to public water systems. These standards are established to protect human health by limiting the levels of contaminants in drinking water. The USEPA also defines National Secondary Drinking Water Regulations (secondary standards) for contaminants that cause cosmetic and aesthetic effects, but not for health effects. The USEPA recommends that these secondary standards be met but does not require systems to comply with them. The USEPA does not oversee the construction and permitting of groundwater wells, but requires that public health standards, such as an effectively installed sanitary seal, are in place. The USEPA will also primarily establish monitoring and operational requirements, which will typically be specific to the project area. Both primary and secondary drinking water standards are expressed as either Maximum Contaminant Levels, which define the highest level of a contaminant allowed in drinking water, or Maximum Contaminant Level Goals, which define the level of a contaminant below which there is no known or expected risk to health. Monitoring requirements typically include total coliform, nitrate, inorganic chemicals, volatile organic chemicals, non-volatile synthetic organic chemicals, secondary drinking water standard constituents, and general chemistry (including alkalinity, hardness, and minerals). The frequency of sampling varies and may be reduced over time.

Federal Emergency Management Agency

The Disaster Relief Act of 1974 as amended by the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1988 created FEMA, which is responsible for determining flood elevations and floodplain boundaries based on U.S. Army Corps of Engineers (USACE) studies. FEMA is also responsible for distributing Flood Insurance Rate Maps, which are used in the National Flood Insurance Program. These maps identify the locations of special flood hazard areas, including 100-year floodplains.

C2-1.2 State and Local

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act provides the basis for surface water and groundwater quality regulation within California. The act established the authority of the California SWRCB and the nine Regional Water Quality Control Boards (RWQCB). The act requires the State, through the SWRCB and the RWQCBs, to designate beneficial uses of surface waters and groundwater and specify water quality objectives designed to protect those uses. These water quality objectives are presented in the Regional Water Quality Control Plans. The surface water quality standards for State of California include both narrative and numerical water quality objectives to keep California's waters swimmable, fishable, drinkable, and suitable for use by industry, agriculture, and the citizens of the state.

Sustainable Groundwater Management Act

The intent of the California Sustainable Groundwater Management Act (SGMA; Water Code § 10720 et seq.) is to “enhance local management of groundwater consistent with rights to use or store groundwater... [and] to preserve the security of water rights in the state to the greatest extent possible consistent with the sustainable management of groundwater.” The SGMA states that “any local agency or combination of local agencies overlying a groundwater basin may elect to be a groundwater sustainability agency for that basin” (Water Code § 10723). A groundwater sustainability agency will be formed within each groundwater basin to prepare and implement a plan for long-term groundwater sustainability.

The Sacramento Central Groundwater Authority (SCGA) was formed in 2006 through a Joint Powers Agreement between the Cities of Elk Grove, Folsom, Rancho Cordova, and Sacramento and the County of Sacramento to comply with the SGMA (SCGA, 2012). SCGA Groundwater Sustainability Agency (GSA), Omochumne-Hartnell Water District (OHWD) GSA, Reclamation District (RD) 551 GSA, Sloughhouse Resource Conservation District (SRCD) GSA, the County of Sacramento GSA, and the Northern Delta GSA (NDGSA) group (collectively referenced to as the GSAs or Agencies) submitted the South American Subbasin Groundwater Sustainability Plan (GSP or Plan) for the South American Subbasin (Subbasin) to the DWR in 2022, and was approved by DWR in 2023.

Title 22 California Code of Regulations

Title 22 CCR Division 4, Chapter 3 regulates the sources, uses, and quality standards of recycled water in the State. Article 3, Section 60304(a) requires that any recycled water used for the

irrigation of food crops, parks and playgrounds, and residential landscaping shall be a disinfected tertiary recycled water. Article 1, Section 60301.230 defines disinfected tertiary recycled water as a wastewater that has been filtered and disinfected, and which meets the following criteria:

- A. The filtered wastewater has been disinfected by either: (1) A chlorine disinfection process following filtration that provides a CT (the product of total chlorine residual and modal contact time measured at the same point) value of not less than 450 milligram-minutes per liter at all times with a modal contact time of at least 90 minutes, based on peak dry weather design flow; OR (2) A disinfection process that, when combined with the filtration process, has been demonstrated to inactivate and/or remove 99.999 percent of the plaque forming units of F-specific bacteriophage MS2, or polio virus in the wastewater. A virus that is at least as resistant to disinfection as polio virus may be used for purposes of the demonstration.
- B. The median concentration of total coliform bacteria measured in the disinfected effluent does not exceed a most probable number (MPN) of 2.2 per 100 milliliter (mL) using the bacteriological results of the last seven days for which analyses have been completed and the number of total coliform bacteria does not exceed an MPN of 23 per 100 mL in more than one sample in a 30-day period. No sample shall exceed an MPN of 240 total coliform bacteria per 100 mL.

City of Elk Grove General Plan

Chapter 7 of the City of Elk Grove's General Plan discusses the city's goals and policies related to waterways, and the conservation and stewardship for surface waterways and water quality, as well as the management of water supply, groundwater recharge, recycled water, and water conservation. The goals and policies within the General Plan that pertain to water resources include the following:

- **GOAL NR-3:** A Clean and Adequate Water Supply
 - **Policy NR-3-1:** Ensure that the quality of water resources (e.g., groundwater, surface water) is protected to the extent possible.
 - **Policy NR-3-2:** Integrate sustainable stormwater management techniques in site design to reduce stormwater runoff and control erosion.
 - **Standard NR-3-2.c:** Post-development peak storm water run-off discharge rates and velocities shall be designed to prevent or reduce downstream erosion, and to protect stream habitat.
 - **Policy NR-3-3:** Implement the City's National Pollutant Discharge Elimination System permit through the review and approval of development projects and other activities regulated by the permit.

C2-2 Environmental Setting

C2-2.1 Drainage and Floodplain

A detention basin is located approximately 900 feet west of the Project Site. The Project Site is slightly sloped so that surface water drains towards a series of pipe culverts located throughout the perimeter of the Project Site, which leads to the detention basin.

This was designed to control runoff from the entire Lent Ranch SPA (City of Elk Grove, 2014). The basin was sized to reduce peak runoff to pre- development levels. This basin ultimately drains into the Beach Stone Lakes basin via the Shed C Channel. This was assessed as a part of the City of Elk Grove’s Storm Drain Master Plan and is intended to improve groundwater recharge and serve as a multifunctional drainage corridor that would create and enhance the natural stream and habitat values (City of Elk Grove, 2014). Soils within the Project Site vary with both slow and very slow infiltration rates (NRCS, 2025).

The Project Site is located on FEMA Flood Insurance Rate Map numbers 06067C0338H and 06067C0475H, and is within an Area of Minimal Flood Hazard (Zone X) as shown in Figure 5 of **Appendix A**. Zone X is designated by FEMA as outside the 500-year flood and protected by levee from 100-year flood (FEMA, 2025).

C2-2.2 Surface Waters

The City of Elk Grove, where the Project Site is located, is situated within the lower portion of the Sacramento River watershed, which covers 27,000 square miles from Lake Shasta to the Sacramento-San Joaquin Delta (City of Elk Grove, 2023). The Project Site is within the Sacramento Drainage Canal watershed 12-digit Hydrologic Unit (HU) 180400121001 which covers approximately 22 square miles (14,134 acres) (USEPA, 2025a). The Consumnes River begins in the Sierra Nevada’s and flows into the Central Valley where it eventually empties into the Mokelumne River as part of the Sacramento-San Joaquin Delta.

Surface water features within the Project Site include a man-made marsh and man-made vernal pools, as shown on Figure 6 of **Appendix A**. These features are isolated, un-channelized, and non-permanent. During the biological resources survey conducted in July 2025, these features did not contain water. The Consumnes River is located approximately 1.7 miles southeast of the Project Site.

Groundwater

The City of Elk Grove is located within the South American Subbasin of the Sacramento Valley Groundwater Basin (City of Elk Grove, 2023). The Sacramento Valley Groundwater Basin is a part of the Central Valley aquifer system, which is the major source of groundwater in the Project Site (City of Elk Grove, 2023). Groundwater in Elk Grove is generally classified as occurring in a shallow aquifer zone or in an underlying deeper aquifer zone extending approximately 200 to 300 feet below the ground surface. The aquifer underlying the Project Site is an unconsolidated and semi consolidated sand and gravel aquifers (USGS, 2025c). DWR monitors and collects groundwater measurement details across California (DWR, 2025). The nearest monitoring station is located approximately 3.25 miles northeast of the Project Site, site code 384150N1213239W001, and was measured on July 02, 2025. The last measured ground surface elevation was recorded at 61.01 feet and the depth to water was recorded at 76.60 feet below ground surface (bgs) (DWR, 2025). Groundwater level conditions are considered “normal (50-75%)” with no significant seasonal groundwater level change (DWR, 2025). The USGS has a groundwater monitoring location (station number 11336585) at the intersection of Waterman Road and Bond Road in the City of Elk Grove, approximately three miles northeast from the Project Site (USGS, 2025b). The gauge height over the last year has ranged from 0.99 feet to 5.41 feet, or 31.93 feet to 43.56 feet above NAVD 1988 (USGS, 2025b).

Water Quality

The Federal CWA, 33 U.S.C. Section 1301 (a)(2), sets forth a goal that waters shall be “fishable and swimmable.” Section 303 (d) of the CWA requires states to prepare a list of all surface waters in their jurisdiction for which beneficial uses of water (drinking, recreation, aquatic habitat, and impaired by pollutants. From this list, the state ranks the impaired waters for purposes of developing water quality control plans that include Total Maximum Daily Loads (TMDLs). There are no waterbodies currently assessed by the USGS within the Project Site’s watershed (USEPA, 2025a). The nearest impaired waterbody is the Consumnes River, located approximately one mile southeast of the Project Site (USEPA, 2025a). The portion of the Consumnes River nearest the Project Site is located within the Grizzly Slough-Cosumnes River watershed (HU 180400130803). The impaired issues for this waterbody include: bacteria and other microbes, low oxygen, mercury, nuisance plants and animals (foreign), and total toxic chemicals (USEPA, 2025a). There is currently no plan in place identified by USGS to address these impairments.

C2-3 Impact Assessment

C2-3.1 Assessment Criteria

Impacts to floodplains would be considered significant if runoff from development were to result in local flooding. Groundwater impacts would be considered significant if development were to adversely affect local water supply either by reducing the availability of potable water or increasing the demand for domestic water to the point where the existing water supply system would need to be expanded. Water quality would be significantly affected if runoff generated by development were to adversely impact water quality standards of receiving water bodies or groundwater.

C2-3.2 Alternative A – Proposed Project

Drainage and Flooding

Due to existing flat topography, minimal grading would be required. Therefore, there would be minimal alteration of drainage patterns due to Alternative A. The Project Site is not within a designated floodplain, and construction would not alter floodplain levels or storage.

Construction impacts under Alternative A would include ground-disturbing activities that could lead to the erosion of topsoil. Construction activities would also include the routine use of potentially hazardous construction materials, such as concrete washings, oil, and grease that could spill onto the ground and dissolve into stormwater. Regulated construction activities impacting greater than one acre are required to apply for coverage under the NPDES Construction General Permit, which requires preparation of a SWPPP prior to ground disturbance. The SWPPP would include BMPs to reduce potential surface water contamination during storm events. BMPs would include, but would not be limited to, those presented in **Appendix B**. BMPs within the SWPPP would minimize adverse impacts to the local and regional watershed from construction activities associated with Alternative A by reducing erosion, reducing the risk of soil contamination from construction materials (e.g., fuel, fertilizer, paint), and preventing the movement of loose soil into waterways.

In addition to BMPs that would be part of the SWPPP, dust suppression BMPs included in **Appendix B** would be implemented to reduce fugitive dust or loose soil from dispersing offsite. Therefore, impacts would be less than significant and no mitigation measures are warranted.

Water Supply

Water would be supplied to the Project Site through a connection to existing water supply infrastructure. The 2020 Urban Water Management Plan for SCWA projects long-term water reliability through 2045 and Alternative A is within the development assumptions for the Project Site (SCWA, 2021). Therefore, Alternative A would not impede the availability of water resources to foreseeably planned development and impacts to water supply would be less than significant. No mitigation measures are warranted.

Water Quality

Surface and groundwater quality could be adversely affected if pollutants were to enter off-site waterways during construction or operation of Alternative A. However, the potential for contaminants to enter the environment would be reduced with adherence to the provisions of the CWA, specifically the terms of the NPDES Construction General Permit, which include the preparation and implementation of a site-specific SWPPP and stormwater BMPs. Additionally, the detention basin located to the west of the Project Site would provide treatment to runoff during operation of Alternative A (City of Elk Grove, 2014). Stormwater from the Project Site would be directed to the detention basin, where it will temporarily be stored prior to entering the conveyance channel Shed C. Therefore, impacts to water quality would be less than significant and no mitigation measures are warranted.

C2-3.3 Alternative B – No Action

Under Alternative B, the Project Site would remain in its current state. There would be no new impacts to water resources, and existing water uses and drainage would continue. No adverse impacts to water resources would occur under the No Action alternative.

C2-4 Mitigation Measures

There are no mitigation measures for water resources.

C3 AIR QUALITY

C3-1 Regulatory Setting

C3-1.1 Federal

Clean Air Act of 1970

The CAA (CAA; 42 USC Chapter 85) is the federal legislation for the protection of air quality. The CAA gives the USEPA authority to regulate air quality by promulgating standards and levels for air quality and enforcing those standards and levels on federal, state, and tribal land. The CAA requires the USEPA to regulate HAPs, which are those pollutants that are known or suspected to cause cancer or other serious health effects, such as reproductive effects or birth defects, or adverse environmental effects.

The Federal CAA of 1970, as amended, establishes air quality standards for several CAPs: ozone (O₃), CO, PM, nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and lead (Pb). These pollutants are termed “criteria” pollutants because the USEPA has established specific concentration threshold criteria based upon specific medical evidence of health effects or visibility reduction, soiling, nuisance, and other forms of damage. These National Ambient Air Quality Standards (NAAQS) are divided into primary and secondary standards. Primary standards are designed to protect public health, and secondary standards are intended to protect public welfare from effects such as visibility reduction, soiling, nuisance, and other forms of damage. NAAQS and California Ambient air quality standards (CAAQS) are presented in **Table C3-1**.

Areas are designated attainment, nonattainment, or maintenance by the USEPA depending on whether the area is below or exceeds the established NAAQS. Nonattainment areas must take steps towards attainment within a specific period of time. Once an area reaches attainment for a particular criteria pollutant, then the area is re-designated to attainment. The CAA places most of the responsibility on states to achieve compliance with the NAAQS. States, municipal statistical areas, and counties that contain areas of nonattainment are required to develop a State Implementation Plan (SIP), which outlines policies and procedures designed to bring the state into compliance with the NAAQS.

Table C3-1: Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards Concentration	National Standards Primary	National Standards Secondary
Ozone (O ₃)	1 hour	0.09 ppm (180 µg/m ³)	–	Same as primary standard
Ozone (O ₃)	8 hours	0.070 ppm (137 µg/m ³)	0.075 ppm (147 µg/m ³)	
Respirable particulate matter (PM ₁₀)	24 hours	50 µg/m ³	150 µg/m ³	Same as primary standard
Respirable particulate matter (PM ₁₀)	Annual arithmetic mean	20 µg/m ³	–	

Pollutant	Averaging Time	California Standards Concentration	National Standards Primary	National Standards Secondary
Fine particulate matter (PM _{2.5})	24 hours	–	35 µg/m ³	Same as primary standard
Fine particulate matter (PM _{2.5})	Annual arithmetic mean	12 µg/m ³	12 µg/m ³	15 µg/m
Carbon monoxide (CO)	8 hours	9.0 ppm (10 mg/m ³)	9 ppm (10 mg/m ³)	–
Carbon monoxide (CO)	1 hour	20 ppm (23 mg/m ³)	35 ppm (40 mg/m ³)	–
Carbon monoxide (CO)	8 hours (Lake Tahoe)	6 ppm (7 mg/m ³)	–	–
Nitrogen Dioxide (NO ₂)	Annual arithmetic mean	0.030 ppm (57 µg/m ³)	0.053 ppm (100 µg/m ³)	Same as primary standard
Nitrogen Dioxide (NO ₂)	1 hour	0.18 ppm (339 µg/m ³)	100 ppb (188 µg/m ³)	–
Sulfur Dioxide (SO ₂)	Annual Arithmetic Mean	–	0.030 ppm (for certain areas) ^h	–
Sulfur Dioxide (SO ₂) ⁹	24 hours	0.04 ppm (105 µg/m ³)	0.14 ppm (for certain areas)	–
Sulfur dioxide (SO ₂)	3 hours	–	–	0.5 ppm (1,300 µg/m ³)
Sulfur dioxide (SO ₂)	1 hour	0.25 ppm (655 µg/m ³)	75 ppb (196 µg/m ³)	–
Lead (Pb)	30-day average	1.5 µg/m ³	–	–
Lead (Pb)	Calendar quarter	–	1.5 µg/m ³ (for certain areas)	Same as primary standard
Lead (Pb)	Rolling 3- month average	–	0.15 µg/m ³	
Visibility-reducing particles	8 hours	See footnote ¹	No national standards	No national standards
Sulfates	24 hours	25 µg/m ³	No national standards	No national standards
Hydrogen sulfide	1 hour	0.03 ppm (42 µg/m ³)	No National Standards	No National Standards
Vinyl Chloride	24 hours	0.01 ppm (26 µg/m ³)	No National Standards	No national standards

Notes: µg/m³ = micrograms per cubic meter; mg/m³ = milligrams per cubic meter; ppb = parts per billion; ppm = parts per million

¹ In 1989, the Air Resources Board converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively

Source: CARB, 2024

Ozone

Photochemical reactions involving reactive organic gases (ROG)/volatile organic compounds (VOC) and nitrogen oxides (NO_x) resulting from the incomplete combustion of fossil fuels are the largest source of ground-level O₃. Because photochemical reaction rates depend on the intensity of ultraviolet light and air temperature, O₃ is primarily a summer air pollution problem. As a photochemical pollutant, O₃ is formed only during daylight hours under appropriate conditions. However, it is destroyed throughout the day and night. O₃ is considered a regional pollutant as the reactions forming it take place over time and are often most noticeable downwind from the sources of the emissions. SVAB is designated as nonattainment for O₃ by the USEPA (USEPA, 2025b).

Particulate Matter 2.5

Particle pollution is a mixture of microscopic solids and liquid droplets suspended in air. This pollution, also known as PM_{2.5}, is made up of a number of components, including acids (such as nitrates and sulfates), organic chemicals, metals, soil or dust particles, and allergens (such as fragments of pollen or mold spores). The size of particles is directly linked to their potential for causing health problems. Particles smaller than 2.5 µm pose the greatest problems because they can be inhaled deep into the lungs. Exposure to such particles can affect respiratory system function. The Sacramento Valley Air Basin is designated as nonattainment for PM_{2.5} by the USEPA (USEPA, 2025b).

Carbon Monoxide

CO is not readily dispersed throughout the atmosphere; therefore, it is considered a localized air quality issue as it is close to the emission source. CO emissions generally cause an acute (short-term) health threat. CO is a pollutant of concern at major signalized intersections (greater than 100,000 vehicles per day) that exhibit prolonged vehicle idling times. SVAB is designated as attainment (maintenance) for CO by the USEPA (USEPA, 2025b).

Hazardous Air Pollutants

In addition to the above-listed CAPs, HAPs are a group of chemical pollutants which can cause adverse effects to human health and/or the environment. The USEPA has developed a list of over 188 airborne chemicals that it considers HAPs. Sources of HAPs include industrial processes, such as petroleum refining and chrome plating operations; commercial operations, such as gasoline stations and dry cleaners; cigarette smoke; and motor vehicle exhaust. Cars and trucks release at least 40 different HAPs. The most important, in terms of health risk, are DPM, benzene, formaldehyde, 1,3-butadiene, and acetaldehyde. Health effects of HAPs can include cancer, birth defects, and neurological damage.

HAPs are less pervasive in the urban atmosphere than CAPs but are linked to short-term (acute) or long-term (chronic or carcinogenic) adverse human health effects. The majority of the estimated health risk from HAPs can be attributed to relatively few compounds. The most important HAPs are found in DPM. Diesel engines emit a complex mixture of air pollutants, composed of gaseous and solid material.

Diesel exhaust contains a variety of harmful gases and over 40 other cancer-causing substances, and the visible emissions in diesel exhaust are PM that includes carbon particles or “soot.” Exposure to DPM is a health hazard, particularly to children whose lungs are still developing and the elderly who may have other serious health problems. Due to the controversy surrounding DPM, an assessment of the potential impacts of DPM releases has been included in **Section C3-3**.

Federal General Conformity

Under the General Conformity Rule, updated in 2010, the lead agency with respect to a federal action is required to demonstrate that the proposed federal action conforms to the applicable SIP before the action is taken. There are two phases to demonstrate general conformity:

- The Conformity Review process, which entails an initial review of the federal action to assess whether a full conformity determination is necessary.
- The Conformity Determination process, which requires that a proposed federal action be demonstrated to conform to the applicable SIP.

The Conformity Review requires the lead agency to compare estimated emissions to applicable general conformity levels (40 CFR 93.153 [b][1] and [2]), which can be seen in **Table C3-2** and **Table C3-3**. If the emission estimates from step one are below the applicable threshold(s), then a general conformity determination is not necessary and the full Conformity Determination is not required. If emission estimates are greater than the applicable threshold(s), the lead agency must conduct a Conformity Determination.

Table C3-2: 40 CFR 93.153 [b][1] Emission Rates for Nonattainment Areas (NAAs)

Pollutant	Tons per Year
Ozone (VOC's or NO _x):	
Serious NAA's	50
Severe NAA's	25
Extreme NAA's	10
Other ozone NAA's outside ozone transport region	100
Other ozone NAA's inside an ozone transport region:	
VOC	50
NO _x	100
Carbon Monoxide: all maintenance areas	100
SO ₂ or NO ₂ : All NAAs	100
PM ₁₀ :	
Moderate NAA's	100
Serious NAAs	70
PM2.5 (direct emissions, SO ₂ , NO _x , VOC, and Ammonia):	
Moderate NAA's	100
Serious NAAs	70
PD: all NAA's	25

Table C3-3: 40 CFR 93.153 [b][2] Emission Rates for Maintenance Areas

Pollutant	Tons per Year
Ozone (NO _x), SO ₂ or NO ₂ :	
All maintenance area	100
Ozone (VOC's)	
Maintenance areas inside an ozone transport region	50
Maintenance areas outside an ozone transport region	100
Carbon monoxide: All maintenance areas	100
PM ₁₀ : All maintenance areas	100
PM _{2.5} (direct emissions, SO ₂ , NO _x , VOC, and Ammonia)	100
All maintenance areas	100
Pb: All maintenance areas	25

Federal Class I Areas

The CAA designates all international parks, national wilderness areas, and memorial parks larger than 5,000 acres and national parks larger than 6,000 acres as “Class I areas.” The CAA prevents significant deterioration of air quality in Class I areas under the Prevention of Significant Deterioration (PSD) Program. The PSD Program protects Class I areas by allowing only a small increment of air quality deterioration in these areas by requiring assessment of potential impacts on air quality related values of Class I areas.

Any major source of emissions within 100 kilometers (62.1 miles) from a federal Class I area is required to conduct a pre-construction review of air quality impacts on the area(s). A “major source” for the PSD Program is defined as a facility that will emit (from direct stationary sources) 250 tons per year (tpy) of regulated pollutant. For certain industries, these requirements apply to facilities that emit (through direct stationary sources) 100 tpy or more of a regulated pollutant. Mobile sources (e.g., vehicle emissions) are by definition not stationary sources and are therefore not subject to the PSD program.

Tribal New Source Review

The Tribal Minor New Source Review (NSR) permitting program was established by the USEPA under the CAA. The minor NSR program applies to both new minor sources and minor modifications to both major and minor projects in attainment and nonattainment areas. Common sources associated with commercial land uses include gas stations, emergency generators, and natural gas-fired boilers, water heaters, and space heaters. A permit under the minor NSR program would be required on tribal trust land if stationary source emissions of regulated pollutants would exceed the thresholds presented in 40 CFR 49.153, Table 1 (presented in **Table C3-4**). This permit serves as a preconstruction permit containing limitations and other restrictions specifying the construction, modification, and operation of a minor source.

Table C3-4: Tribal Minor New Source Review Thresholds

Pollutant	Emissions Thresholds for Nonattainment Areas (tpy)	Emissions Thresholds for Attainment Areas (tpy)
NO _x	5	10
ROG	2	5
PM	5	10
PM ₁₀	1	5
PM _{2.5}	0.6	3
CO	5	10
SO ₂	5	10
Pb	0.1	0.1

Source: 40 CFR 49.153.

C3-1.2 State and Local

California Clean Air Act of 1988

The California Air Resources Board (CARB) oversees air quality planning and control throughout California. CARB is primarily responsible for ensuring implementation of the California Clean Air Act (CCAA), responding to the CAA requirements, and regulating emissions from motor vehicles and consumer products in the State. CARB has established emissions standards for vehicles sold in California and for various types of equipment available commercially. It also sets fuel specifications to further reduce vehicular emissions.

The CCAA establishes ambient air quality standards for the state and a legal mandate to achieve these standards by the earliest practical date. These standards apply to the same six criteria pollutants as the CAA and also include sulfate, visibility, hydrogen sulfide, and vinyl chloride. They are generally more stringent than the NAAQS and, in the case of PM₁₀ and NO₂, are far more stringent. CAAQS are health-based to protect the health and welfare of the populace with a reasonable margin of safety. These pollutants include ozone, CO, NO₂, SO₂, PM₁₀, PM_{2.5}, sulfates, Pb, hydrogen sulfide, vinyl chloride, and visibility-reducing particles.

Sacramento Metropolitan Air Quality Management District

SMAQMD is responsible for maintaining healthy air quality and ensuring compliance with federal and state air quality standards. The District's clean air strategy includes preparing attainment plans, adopting and enforcing rules and regulations for air pollution sources, and issuing permits for stationary sources. The rules most relevant to Alternative A are summarized below:

Rule 402 – Nuisance: Aims to protect the public's health and welfare from the emission of air contaminants which constitute a nuisance.

Rule 403 – Fugitive Dust: Aims to reasonably regulate operations which periodically may cause fugitive dust emissions into the atmosphere.

Rule 404 – Particulate Matter: Aims to limit the quantity of particulate matter in the atmosphere through establishment of an emission concentration limit.

Rule 442 – Architectural Coatings: Aims to limit the emissions of VOCs from the use of architectural coatings supplied, sold, offered for sale, applied, solicited for application, or manufactured for use within the District.

Rule 453 – Cutback and Emulsified Asphalt Paving Materials: Aims to limit emissions of VOCs from the use of cutback and emulsified asphalt in paving materials, paving and maintenance operations.

City of Elk Grove General Plan

Chapter 7 of the City of Elk Grove’s General Plan addresses natural resource preservation, including air quality. The chapter emphasizes that maintaining good air quality by reducing harmful pollutants, including greenhouse gas (GHG) emissions, is critical to protecting both human and ecological health. Relevant goals and policies related to air quality include the following:

Goal NR-4: Improved Air Quality

Policy NR-4-1: Require all new development projects which have the potential to result in substantial air quality impacts to incorporate design, and/or operational features that result in a reduction in emissions equal to 15 percent compared to an “unmitigated baseline project.”

Policy NR-4-8: Require that development projects incorporate best management practices during construction activities to reduce emissions of criteria pollutants.

Policy NR-4-11: Work with Sacramento County and the SMAQMD to address cross-jurisdictional and regional transportation and air quality issues.

Policy NR-4-12: Coordinate with the SMAQMD on the review of proposed development projects, specifically projects that could conflict with any applicable air quality plans and/or the State Implementation Plan.

Policy NR-4-13: Minimize the exposure of sensitive land uses to objectionable odors.

C3-2 Environmental Setting

C3-2.1 Regional Meteorology

The Project Site is located in the southern portion of SVAB, which coincides with the City of Elk Grove, Sacramento County. The Sacramento Valley is bound by the Coast Range to the west, the Sierra Nevada to the east, and the Cascade Range to the north. These surrounding mountain ranges both channel winds through the valley and inhibit the dispersion of air pollutants. The region experiences two predominant seasonal wind patterns: during spring, summer, and fall, winds generally originate from the Pacific Ocean and flow inland through a gap in the Coast Range, while in winter, northerly winds prevail (City of Elk Grove, 2018).

C3-2.2 Air Quality

Major contributors to air pollution within the SVAB and Sacramento County include motor vehicle transportation from automobiles, trucks, and transit buses. Climatic factors, particularly the frequency of hot, sunny days during the summer, significantly influence air pollution potential. These conditions promote ozone formation, as ROGs and NO_x react under ultraviolet sunlight and elevated temperatures. Consequently, the SVAB is especially prone to photochemical air pollution episodes during the summer, when temperatures often reach the 90s and can exceed 100°F (City of Elk Grove, 2018).

Attainment Status

The Project Site is currently within the jurisdictional area of the SMAQMD. The SMAQMD regulates air pollutant emissions from stationary sources within Sacramento County, including the Project Site. However, once the Project Site is taken into federal trust, air quality would be under the jurisdiction of the USEPA.

To determine conformance with the NAAQS, states are responsible for providing ambient air monitoring data to the USEPA. The USEPA then determines, using the violation criteria, if the results of the monitoring data indicate compliance with the NAAQS. The USEPA classifies areas in compliance with the NAAQS as being in "attainment." Areas that do not meet the NAAQS are classified as being in "nonattainment" by the USEPA. Maintenance areas are those that have been redesignated from nonattainment to attainment and are subject to a Maintenance Plan prepared by the state, which demonstrates how the area will continue to meet the NAAQS. As shown in **Table C3-6**, Sacramento County, where the Project Site is located, is designated nonattainment for ozone and PM_{2.5} and attainment/maintenance for CO and PM₁₀ under federal air quality standards. The County meets federal standards or is unclassifiable for all other criteria pollutants.

Table C3-6: Sacramento County NAAQS Attainment Status

Pollutant	NAAQS
Ozone (8-hour)	Nonattainment (Serious)
PM ₁₀ (24-hour, annual)	Attainment (Maintenance)
PM _{2.5} (annual)	Nonattainment (Moderate)
Carbon Monoxide (8-hour, 1-hour)	Attainment (Maintenance)
Nitrogen Dioxide (annual, 1-hour)	Attainment/Unclassified
Sulfur Dioxide (24-hour, 1-hour)	Attainment/Unclassified
Lead (30-day average)	Attainment/Unclassified

Source: USEPA, 2025b

PM₁₀: Particulate matter with diameters that are generally 10 micrometers and smaller

PM_{2.5}: Particulate matter with diameters that are generally 2.5 micrometers and smaller

Sensitive Receptors

Sensitive receptors are generally defined as land uses that house or attract people who are susceptible to adverse effects from air pollution emissions and should therefore be given special consideration when evaluating air quality impacts from projects.

Sensitive receptors include facilities that house or attract children, the elderly, people with illnesses, or others who are especially sensitive to the effects of air pollutants. Hospitals, schools, convalescent homes, parks and recreational facilities, and residential areas are examples of sensitive receptors. The nearest sensitive receptors to the Project Site include the Sterling Meadows residential neighborhood located directly west of the site, a medical center located along the northern boundary, and Harvest Church, located approximately 500 feet east, across Highway 99.

C3-3 Impact Assessment

C3-3.1 Assessment Criteria

Development and operation of Alternative A would emit CAPs, HAPs, and CO_{2e} emissions. This section presents the methodology used to assess the affected environment and to evaluate the potential air quality effects of the project alternatives. Adverse impacts to ambient air quality could result if either construction or operation would result in violations of the CAA provisions, or if emissions would impede the ability of the State to meet NAAQSs. The effects of proposed federal actions on SMAQMD air quality management are assessed below as required under the CAA.

C3-3.2 Methodology

Construction Analysis

Construction of Alternative A was assumed to begin in March 2026 and continue for a duration of approximately 24 months. Construction activities would include land clearing, grading, building construction, and site improvements for parking and circulation. Effects on air quality during construction were evaluated by estimating the quantity of each CAP emitted over the duration of the construction period. Particulate matter (PM₁₀ and PM_{2.5}) are the pollutants of concern resulting during earth-moving and fine grading activities. VOCs, NO_x, SO₂, CO, CO_{2e}, and DPM emissions would be emitted from heavy equipment due to the combustion of diesel fuel. Construction-related emissions were quantified using the California Emissions Estimator Model (CalEEMod) Version 2022.1.1.29. Emissions results are summarized below and included in **Appendix D**.

Operational Analysis

Annual operation emissions for the alternatives were calculated using CalEEMod. **Appendix D** includes the assumptions and inputs incorporated into CalEEMod; default values were used in most cases.

Hazardous Air Pollutants

Construction activities would result in short-term emissions of DPM from off-road heavy-duty diesel equipment exhaust and diesel-fueled haul trucks. Construction-related HAP emissions are addressed within the construction emissions discussion below. Operational HAPs are primarily associated with manufacturing sites, dry cleaners, autobody shops, and industrial land uses. Alternative A does not include any facilities that would emit substantial sources of HAPs; accordingly, no further analysis of operational HAP emissions is provided.

Federal General Conformity

Conformity regulations apply to federal actions that would cause emissions of CAPs above certain levels to occur in locations designated as nonattainment or maintenance areas for the emitted pollutants. As discussed in **Section C3-2**, the Project Site is located in an area that is designated nonattainment for ozone and PM_{2.5} and attainment (maintenance) for CO and PM₁₀ under federal air quality standards. All other pollutants are designated attainment or unclassifiable. If project emissions are equal to or exceed applicable levels for any CAP provided in 40 CFR §93.153 (b)(1) and (2), then a federal general conformity determination analysis would be required. Stationary sources are exempt under conformity regulations and therefore not subject to de minimis levels. The requirement for a conformity determination for Alternative A is discussed below.

CO₂e Emissions

Impacts resulting from CO₂e emissions were calculated using CalEEMod and are discussed in Section C13-3 of **Section C13**.

Federal Class I Areas

The nearest Class I area is Mokelumne Wilderness, approximately 70 miles from the Project Site (USEPA, 2025c). As the Project Site is not within 100 kilometers (62.1 miles) of the Class I area, no additional PSD program analysis is required.

Tribal New Source Review

Alternative A may include stationary sources subject to NSR permitting requirements. Common sources associated with commercial land uses include gas stations, emergency generators, and natural gas-fired boilers, water heaters, and space heaters. Specific sources have not been identified at this time. The Tribe will be required to apply for an NSR permit for any sources that exceed the thresholds identified in **Table C3-4**.

C3-3.3 Alternative A – Proposed Project

Construction Emissions

Construction of Alternative A would result in the temporary generation of emissions from the use of heavy-duty diesel construction equipment and worker and vendor vehicle trips. The Project Site is relatively flat and therefore would only require minor grading with balanced cut and fill assumed. As such, there would be negligible emissions associated with hauling trips required for material import or export. Fugitive dust, the dominant source of PM₁₀ and PM_{2.5} emissions, is generated when vehicles and equipment disturb soil and other friable materials. Uncontrolled dust from construction can become a nuisance and potential health hazard to those living and working nearby. Off-road construction equipment is often diesel-powered and can be a substantial source of NO_x emissions, in addition to PM₁₀ and PM_{2.5} emissions. Painting, worker commute trips, and asphalt paving are dominant sources of VOC emissions. Such air quality effects generally would be temporary and localized.

Construction emissions were estimated using CalEEMod, with detailed output files included in **Appendix D**. The estimated construction emissions are summarized in **Table C3-7**.

Table C3-7: Construction Emissions of Criteria Pollutants (tons/year) – Alternative A

Emissions	NO_x	VOC	CO	SO₂	PM₁₀	PM_{2.5}
2026	2.03	0.24	2.62	< 0.005	0.65	0.28
2027	1.79	0.23	2.70	0.01	0.34	0.12
2028	0.05	2.08	0.09	< 0.005	0.01	< 0.005
Maximum Year Emissions	2.03	2.08	2.70	0.01	0.65	0.28
<i>De minimis Level</i>	50	50	100	N/A	100	100
Exceed Level?	No	No	No	No	No	No

Notes: N/A = Not Applicable. *De minimis* levels are only applicable for projects in nonattainment and maintenance areas.

Source: **Appendix D**

As shown in **Table C3-7**, emissions of individual criteria pollutants from the construction of Alternative A would not exceed applicable *de minimis* levels; therefore, a conformity determination is not required for these pollutants during construction. Construction emissions would be reduced with implementation of standard construction BMPs described in **Appendix B** including, but not limited to, site watering, street sweeping, limits on vehicle speeds, and minimization of vehicle idling. These BMPs would control the production of fugitive dust (PM₁₀ and PM_{2.5}) and reduce emissions of CO_{2e}, criteria pollutants, and DPM. This would reduce the overall quantity of these emissions and dust that could disperse off-site and negatively affect neighboring areas. Construction-related activities would result in the generation of HAPs, specifically DPM from diesel-powered equipment exhaust, with the potential to affect nearby sensitive receptors. However, construction would be temporary, lasting only 24 months, which is a relatively short duration compared to the long-term exposure periods (e.g., 30 years or more) typically associated with health risk impacts from HAPs. Further, because only portions of the Project Site would be disturbed at a time and construction equipment would operate intermittently and in different locations, DPM emissions would not be concentrated in one area or persist for extended time periods. Given the temporary nature of construction and the relatively short duration of potential exposure, the likelihood of any one sensitive receptor experiencing prolonged exposure to HAP emissions is low. Furthermore, operational emissions of PM_{2.5}, as shown in **Table C3-7**, are minor, and DPM, which is a subset of PM_{2.5}, is also highly dispersive. Implementation of construction BMPs described in **Appendix B** would further reduce emissions of DPM. As such, construction-related HAP emissions are not expected to pose a health risk to nearby residents. Construction of Alternative A would not result in significant effects on regional air quality, and no mitigation measures are warranted.

Operational Emissions

Buildout and operation of Alternative A would result in the generation of mobile emissions from patron, employee, and delivery vehicles, as well as stationary-source emissions from combustion of natural gas in heating units, and other equipment. The estimated operational emissions are provided in **Table C3-8**. Detailed calculations of vehicle and area emissions are included in **Appendix D**.

As shown in **Table C3-8**, emissions of individual criteria pollutants from the operation of Alternative A would not exceed applicable *de minimis* levels; therefore, a conformity determination is not required for these pollutants during operation. Although specific development under Alternative A is not yet known, potential future uses could include a service station, which may release HAPs from gasoline vapors during fuel transfer, underground storage tank venting, and vehicle refueling (including minor spillage). If developed, the service station would require a USEPA minor NSR permit, which mandates emissions control technology, including vapor recovery systems, to minimize releases. With compliance with minor NSR permit requirements and implementation of the BMPs described in **Appendix B** - including adherence to applicable building standards and use of energy and water saving appliances - air quality impacts from operation of Alternative A would be less than significant and no mitigation measures are warranted.

Table C3-8: Operational Emissions of Criteria Pollutants (tons/year) – Alternative A

Source	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Annual Emissions	14.9	9.73	78.5	0.17	15.5	4.05
<i>De minimis</i> Levels	50	50	100	N/A	100	100
Exceed Level?	No	No	No	N/A	No	No

Notes: N/A = Not Applicable. *De minimis* levels are only applicable for projects in nonattainment and maintenance areas.

Source: **Appendix D**

C3-3.4 Alternative B – No Action

Under the No Action alternative, the Project Site would remain as is and none of the construction or operational air quality impacts identified under Alternative A would occur. There would be no impact.

C3-4 Mitigation Measures

There are no mitigation measures for air quality.

C4 BIOLOGICAL RESOURCES

C4-1 Regulatory Setting

C4-1.1 Federal

Federal Endangered Species Act

FESA protects species at risk of extinction and provides for conservation of the ecosystems on which they depend. USFWS and the National Oceanic and Atmospheric Administration Fisheries Service (NOAA Fisheries) share responsibility for implementing FESA. Generally, USFWS manages terrestrial and freshwater species, while NOAA is responsible for marine and anadromous species. Section 9 (§ 1538) prohibits the "take" of a listed species by anyone, including private individuals and state and local agencies. Threatened and endangered species on the federal list (50 CFR Sections 17.11 and 17.12) are protected from take.

Pursuant to the requirements of the FESA, a federal agency reviewing a proposed project within its jurisdiction must determine whether any federally listed species may be present on a project site and whether a project will have a potentially significant impact upon such species. In addition, the agency is required to determine whether the project is likely to jeopardize the continued existence of any species that is proposed for listing under the FESA or to result in the destruction or adverse modification of critical habitat proposed to be designated for such species (16 USC Section 1536[3], [4]).

Magnuson-Stevens Act and Sustainable Fisheries Act

The Magnuson–Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) is the primary law that governs marine fisheries management in U.S. federal waters. First passed in 1976, the Magnuson-Stevens Act fosters the long-term biological and economic sustainability of marine fisheries. The Sustainable Fisheries Act of 1996 (Public Law 104-297) amended the Magnuson-Stevens Act to establish new requirements for fishery management councils to identify and describe EFH and to protect, conserve, and enhance EFH for the benefit of fisheries. EFH is defined as those waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity. The Sustainable Fisheries Act also established a federal EFH consultation process that advises federal agencies to avoid, minimize, mitigate, or otherwise offset adverse effects on EFH. Consultation is required if a federal agency has authorized, funded, or undertaken a proposed activity and if the action will adversely affect EFH.

Migratory Bird Treaty Act

Migratory birds are protected under the federal MBTA of 1918 (16 USC 703-711). The MBTA makes it unlawful to take, possess, buy, sell, purchase, or barter any migratory bird listed under 50 CFR 10, including feathers or other parts, nests, eggs, or products, except as allowed by implementing regulations (50 CFR 21).

Bald and Golden Eagle Protection Act

The Bald and Golden Eagle Protection Act was originally enacted in 1940 to protect bald eagles and was later amended to include golden eagles (16 USC Subsection 668-668). This act prohibits take, possession, and commerce of bald and golden eagles and associated parts, feathers, nests, or eggs with limited exceptions. The definition of take is the same as the definition under the FESA. In 2007, the bald eagle was federally delisted under FESA. However, the provisions of the act remain in place for protection of bald and golden eagles.

Clean Water Act - Sections 404 and 401

Any project that involves discharge of dredged or fill material into navigable waters of the U.S. must first obtain authorization from the USACE, under Section 404 of the CWA. Projects on trust land requiring a 404 permit under the CWA also require a Section 401 certification from USEPA for trust land. These two agencies also administer the NPDES general permits for construction activities disturbing one acre or more.

C4-1.2 State and Local

California Endangered Species Act

The California Endangered Species Act (CESA) declares that deserving plant or animal species will be given protection by the State because they are of ecological, educational, historical, recreational, aesthetic, economic, and scientific value to the people of the State. The CESA established that it is State policy to conserve, protect, restore, and enhance State listed species and their habitats. Under State law, plant and animal species may be formally listed by the California Fish and Game Commission. CESA authorizes that private entities may take listed species under the FESA and CESA, pursuant to a federal incidental take permit issued in accordance with Section 10 of the FESA, if the California Department of Fish and Wildlife (CDFW) certifies that the incidental take statement or incidental take permit is consistent with CESA (California Fish & Game Code § 2080.1[a]).

California Fish and Game Code

The California Fish and Game Code defines “take” (Section 86) and prohibits take of a species listed under the CESA (California Fish and Game Code § 2080), or otherwise special status (California Fish and Game Code §§ 3511, 4700, and 5050). Section 2081(b) and (c) of the CESA allows CDFW to issue an incidental take permit for a State listed species if specific criteria outlined in Title 14 CCR §§ 783.4(a), (b) and CDFW Code § 2081(b) are met. The CDFW Code § 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird except as otherwise provided by the code. Section 3503.5 states that it is unlawful to take, possess, or destroy any birds in the taxonomic order Falconiformes or Strigiformes (birds of prey) or to take, possess, or destroy the nest or eggs of any such bird. Section 3513 states that it is unlawful to take or possess any migratory non-game bird as designated in the MBTA or any part of such migratory non-game bird except as provided by rules and regulations adopted by the U.S. Secretary of the Interior under provisions of the MBTA. If a project is planned in an area where a species or specified bird occurs, an applicant must design the project to avoid all take; the CDFW cannot provide take authorization under the CESA.

Native Plant Protection Act of 1977

The Native Plant Protection Act of 1977 and implementing regulations in Section 1900 et seq. of the California Fish and Game Code designate special-status plant species and provide specific protection measures for identified populations. CDFW administers the Native Plant Protection Act.

City of Elk Grove General Plan

Chapter 7 of the City of Elk Grove’s General Plan addresses Community and Resource Protection. This chapter identifies and discusses the city’s goals for conserving the environment and natural resources. The following goals and their policies relate to the conservation of biological resources within the City and natural resources:

- **GOAL NR-1:** Protected Natural Open Space Lands that Provide Recreation and Habitat for Native Species

- **Policy NR-1-2:** Preserve and enhance natural areas that serve, or may potentially serve, as habitat for special-status species. Where preservation is not possible, require that appropriate mitigation be included in the project.
 - **Standard NR-1.2a:** Require a biological resources evaluation for private and public development projects in areas identified to contain or possibly contain special-status plant and animal species.
 - **Standard NR-1.2b:** Require development projects to retain movement corridor(s) adequate (both in size and in habitat quality) to allow for the continued wildlife use based on the species anticipated in the corridor.
- **Policy NR-1-4:** Avoid impacts to wetlands, vernal pools, marshland, and riparian (streamside) areas unless shown to be technically infeasible. Ensure that no net loss of wetland areas occurs, which may be accomplished by avoidance, revegetation, restoration on-site or through creation of riparian habitat corridors, or purchase of credits from a qualified mitigation bank.
- **GOAL NR-2:** Preserved Trees and Urban Forest

C4-2 Environmental Setting

C4-2.1 Methodology

Acorn Environmental biologists Dr. Geo Graening and Kimberlina Gomez conducted biological resources surveys of the Project Site on March 11, 2025 and July 14, 2025 to identify habitat types, federally listed species, suitable habitat for federally listed species, potentially occurring waters of the U.S., and other sensitive biological resources on the Project Site. Variable-intensity pedestrian surveys were conducted across the Project Site. Fauna and flora observed were recorded in a field notebook and identified to the lowest possible taxon; observed species are listed in **Appendix E-2**. Survey efforts emphasized the search for federally listed species with potential to occur in the vicinity of the Project Site. Habitat types on the Project Site were mapped on aerial photographs and information on habitat conditions and the suitability of habitats to support listed species was also recorded. The following sources of information were reviewed:

- California Natural Diversity Database (CNDDDB), electronically updated monthly by subscription to CDFW (**Appendix E-1**)
- California Native Plant Society (CNPS) Rare Plant Inventory (CNPS, 2025)
- USGS 7.5 degree-minute topographic quadrangles of the Project Site and vicinity
- Aerial photography of the Project Site
- USFWS species list (Information for Planning and Consultation [IPaC] Report; **Appendix E-1**)
- USFWS Critical Habitat for Threatened and Endangered Species (USFWS, 2025)
- USFWS National Wetlands Inventory (NWI) mapper (Figure 7 of **Appendix A**)

C4-2.2 Habitat Types

The Project Site consists predominantly of agricultural (hay crop) and ruderal/developed habitats (Figure 6 of **Appendix A**). Representative photographs of the Project Site are included in **Appendix E-3**. The USFWS NWI map does not identify recorded aquatic features within the Project Site (see Figure 7 of **Appendix A**).

Aquatic features on the Project Site observed during the surveys include over twenty man-made vernal pools and one marsh. Habitats are further discussed below.

Agricultural (Hay Crop)

The majority of the Project Site is currently used for hay production, and is sown with pasture grasses, including perennial ryegrass (*Lolium perenne*), barley (*Hordeum murinum*), brome (*Bromus diandrus*), oat (*Avena*), and wheat (*Triticum*). Weedy forbs are present and species composition is similar to that of the ruderal habitats discussed below.

Ruderal/Developed

Ruderal/developed areas on the Project Site consist of paved roads, sidewalks, and landscaping, including ornamental trees such as Bradford pear (*Pyrus calleryana*) and Brazilian peppertree (*Schinus sp.*). Other areas are ruderal, and subject to vegetation control. Various invasive grasses are present (*Bromus tectorum*, *Vulpia myuros*, etc.) as well as weedy forbs, such as Italian thistle (*Carduus pycnocephalus*), star thistle (*Centaurea calcitrapa*), clovers (*Trifolium spp.*), and mustards (*Brassica spp.*).

Vernal Pools

As shown in Figure 7 of **Appendix A**, the central portion of the Project Site contained over 30 isolated man-made vernal pools. Characteristics of the vernal pools include hydrophytic vegetation and hydrologic indicators. Dominant vegetation within these features includes rushes (*Juncus bufonius* and *J. xiphioides*); tall flatsedge (*Cyperus eragrostis*); annual rabbitsfoot grass (*Polypogon monspeliensis*); dwarf woolyheads (*Psilocarphus brevissimus*); and curly dock (*Rumex crispus*). Hydrologic characteristics present in these features include surface soil cracks. These features are isolated, un-channelized, and seasonally fill with water during wetter months and are dry during warmer summer months.

A review of historic aerial imagery shows that these features were created as a result of previous grading and earthwork activities associated with the old mall site, which was within and adjacent to the Project Site. It is possible that the features were created for cut and fill purposes. As shown in **Appendix E-4**, in May 1993 and June 2007, the Project Site consisted of undeveloped agricultural land with no aquatic features present. In July 2008, the aquatic features appear in aerial imagery along with construction-related activities and development within and adjacent to the Project Site, as shown in **Appendix E-4**. During the months when rain is common, the aquatic features are shown as filled with water, and they diminish in visibility during hotter, drier months. In January 2024, aerial imagery shows the aquatic features filled with water (**Appendix E-4**). In June 2025, the aquatic features are visible but were not shown to contain water. Due to the surrounding urbanized environment, these pools provide low habitat value for wildlife.

Marsh

As shown on Figure 7 of **Appendix A**, the southwestern corner of the central parcel within the Project Site contains a small seasonal marsh approximately 0.16 acres in size. At the time of the surveys, this feature did not contain water. Hydrophytic vegetation present includes tall flatsedge, curly dock, and coyote thistle (*Eryngium sp.*). Topography within this portion of the Project Site is of lower elevation compared to the surrounding area.

This feature is isolated, un-channelized, and seasonally collects runoff. Due to the surrounding urbanized environment, this feature provides low habitat value for wildlife.

C4-2.3 Federally listed Species

Federally listed species shown in **Table C4-1** were identified as having the potential to occur in the region of the Project Site. Due to the disturbed nature, surrounding urbanized environment, and isolation of the Project Site by heavy development and major roadways, habitat on the Project Site generally provides low habitat value for federally listed species.

Table C4-1: Federally Listed Species with the Potential to Occur in the Region

Species Name	Listing Status	Potential to Occur on Project Site
Giant garter snake (<i>Thamnophis gigas</i>)	Threatened	Low. While the Project Site contains a small isolated marsh, no suitable upland habitat or basking sites are present, and the marsh does not contain sufficient water. The Project Site is also surrounded by developed roadways limiting the potential for dispersal. Additionally, silt fencing shall be placed to prevent sedimentation from entering aquatic areas and as a barrier from construction.
Northwestern pond turtle (<i>Actinemys marmorata</i>)	Proposed Threatened	Low. While the Project Site contains a small isolated marsh, no suitable upland habitat or basking sites are present, and the marsh does not contain sufficient water. The Project Site is also surrounded by developed roadways limiting the potential for dispersal. Additionally, silt fencing shall be placed to prevent sedimentation from entering aquatic areas and as a barrier from construction.
Western spadefoot (<i>Spea hammondi</i>)	Proposed Threatened	None. While the Project Site contains vernal pools, they are man-made and isolated from other aquatic features. The Project Site is also surrounded by developed roadways limiting the potential for dispersal.
Monarch butterfly (<i>Danaus Plexippus</i>)	Proposed Threatened	None. No suitable habitat (habitat with milkweed or flowering plants) is present within the Project Site.
Valley elderberry longhorn beetle (<i>Desmocerus californicus dimorphus</i>)	Threatened	None. No suitable habitat (habitat with elderberry shrubs) is present within the Project Site.
Vernal pool fairy shrimp (<i>Branchinecta lynchi</i>)	Threatened	Low. While the Project Site contains vernal pools, they are man-made and isolated from other aquatic features.
Vernal pool tadpole shrimp (<i>Lepidurus packardii</i>)	Endangered	Low. While the Project Site contains vernal pools, they are man-made and isolated from other aquatic features.
Fleshy Owl's-clover (<i>Castilleja campestris ssp. succulenta</i>)	Threatened	None. The Project Site is outside of the elevation range of the species and is sewn with hay. This species was not observed during surveys conducted during its bloom period.
Sacramento orcutt grass (<i>Orcuttia viscida</i>)	Endangered	None. The Project Site is outside of the elevation range of the species and is sewn with hay. This species was not observed during surveys conducted during its bloom period.
Slender Orcutt grass (<i>Orcuttia tenuis</i>)	Threatened	None. The Project Site is outside of the elevation range of the species and is sewn with hay. This species was not observed during surveys conducted during its bloom period.

C4-2.4 State listed Species

In addition to the federally listed species above, the following State listed species were identified as having the potential to occur in the region of the Project Site. Due to the disturbed nature, surrounding urbanized environment, and isolation of the Project Site by heavy development and major roadways, habitat on the Project Site generally provides low habitat value for State listed species. Additionally, State listed species generally are not afforded recognition on trust land.

Species Name	Listing Status	Potential to Occur on Project Site
Swainson's Hawk (<i>Buteo swainsoni</i>)	Threatened	None. No suitable nesting habitat is present on the Project Site, however the species may forage on the Project Site.
Tricolored blackbird (<i>Agelaius tricolor</i>)	Threatened	None. No suitable nesting habitat is present within the Project Site; however, the species may forage on the Project Site.
Burrowing owl (<i>Athene cunicularia</i>)	Candidate Endangered	None. No suitable habitat is present within the Project Site as burrows are not present. The species may forage on the Project Site.
California tiger salamander – central California DPS (<i>Ambystoma californiense</i> pop. 1)	Threatened	Low. The Project Site contains vernal pools but is disturbed and lacks burrows and suitable upland habitat. The Project Site is also surrounded by developed roadways limiting the potential for dispersal.
Steelhead – Central Valley DPS (<i>Oncorhynchus mykiss irideus</i> pop. 11)	Species of Special Concern	None. No suitable habitat (freshwater rivers and ocean) is present within the Project Site.
Dwarf downingia (<i>Downingia pusilla</i>)	California Rare Plant Rank 2B.2	None. The Project Site is sewn with hay. This species was not observed during surveys conducted during its bloom period.
Boggs Lake hedge-hyssop (<i>Gratiola heterosepala</i>)	Endangered	None. The Project Site is sewn with hay. This species was not observed during surveys conducted during its bloom period.
Legenere (<i>Legenere limosa</i>)	California Rare Plant Rank 1B.1	None. The Project Site is sewn with hay. This species was not observed during surveys conducted during its bloom period.
Sanford's arrowhead (<i>Sagittaria sanfordii</i>)	California Rare Plant Rank 1B.2	None. The Project Site is sewn with hay. This species was not observed during surveys conducted during its bloom period.

C4-2.5 Historical Occurrences of Listed Species

The CNDDDB and Biogeographic Information and Observation System (BIOS) databases were queried for reported occurrences of listed species. The CNDDDB does not report any federally listed species occurrences within the Project Site, but does report the following federally listed species occurrences within two miles of the Project Site:

- Giant garter snake: Reported approximately 1.25 miles northeast of Project Site in 2002.
- Vernal pool tadpole shrimp: Reported approximately 1.3 miles northeast of the Project Site in 1993.
- Vernal pool fairy shrimp. Reported approximately 1.3 miles northeast of the Project Site in 1993.

However, it should be noted that none of these occurrences were within the last 20 years and the conditions of the region are different than when the occurrences were reported.

C4-2.6 Critical Habitat and EFH

There is no designated or proposed critical habitat or EFH within or adjacent to the Project Site (USFWS, 2025).

C4-3 Impact Assessment

C4-3.1 Assessment Criteria

Development would have a significant adverse impact on biological resources if construction or operation were to result in the loss of sensitive or critical habitat; have a substantial adverse effect on species with special status under the FESA; have a substantial adverse effect on habitat necessary for the future survival of such species, including areas designated as critical habitat or EFH; result in a take of migratory bird species as defined by the MBTA; and/or have a substantial adverse effect on federally protected waters of the U.S.

C4-3.2 Alternative A – Proposed Project

Sensitive Habitats

Development would avoid impacts to aquatic habitats which are located in proposed open space shown on Figure 4 of **Appendix A**. Development would be limited to ruderal/developed and agricultural (hay crop) habitats that have been modified from their natural state and are subject to ongoing disturbance, vegetation management, or other activities that limit the value of habitat to wildlife.

Aquatic habitats within the Project Site include man-made vernal pools and a marsh. These features are isolated, unchannelized, do not contain relatively permanent flow, and are therefore unlikely to be considered waters of the U.S. Additionally, due to the surrounding urbanized environment, these features provide low habitat value for wildlife. However, development proposed under Alternative A would avoid direct impacts to the aquatic features, which are located in proposed open space. Indirect impacts from potential discharge of pollutants to aquatic features during construction are addressed in **Section C2**. With adherence to the NPDES Construction General Permit and implementation of a SWPPP that includes BMPs listed in **Appendix B**, indirect impacts to aquatic features during construction would be less than significant and no mitigation measures are warranted.

Federally Listed Species

The Project Site is currently used for hay production and does not contain suitable habitat to support federally listed plant species. Additionally, surveys were conducted during the bloom period for federally listed plant species with the potential to occur in the region (**Table C4-1**), and no federally listed plant species were observed.

Due to the disturbed nature, surrounding urbanized environment, and isolation of the Project Site by heavy development and major roadways, habitat on the Project Site generally provides low habitat value for federally listed animal species. No federally listed animal species were observed during surveys conducted within the Project Site. The Project Site contains low quality habitat within the man-made vernal pools to support the following federally listed species: vernal pool fairy shrimp and vernal pool tadpole shrimp. These features are isolated, un-channelized, rarely contain water, and are therefore considered low quality habitat. The Project Site also contains low quality habitat within the marsh to support northwestern pond turtle and giant garter snake. This feature was isolated and surrounded by roadways and development and lacks sufficient water to support these species. However, development would avoid impacts to the vernal pools and would convert ruderal/developed and agricultural (hay crop) habitats. Indirect impacts from potential discharge of pollutants to aquatic features during construction are addressed in **Section C2**. BMPs in **Appendix B** include implementing silt fencing around the perimeter of work areas to exclude potentially occurring federally listed species and prevent sediment from impacting off-site aquatic resources. Furthermore, with adherence to the NPDES Construction General Permit and implementation of a SWPPP that includes BMPs listed in **Appendix B**, indirect impacts to aquatic features during construction that may provide low quality habitat to federally listed species would be less than significant and no mitigation measures are warranted.

Nesting Migratory Birds

The Project Site is utilized for hay production and contains minimal suitable nest habitat and is already heavily disturbed with noise and human activity due to surrounding development and traffic. These factors make the potential for nesting birds/raptors unlikely; however BMPs (Appendix B) include a preconstruction nesting migratory bird/raptor survey should construction commence during the general nesting season. There would be a less than significant impact and no mitigation is required.

Critical Habitat

There is no designated critical habitat within or adjacent to the Project Site. The nearest designated critical habitat is for Delta smelt and is located approximately five miles southwest of the Project Site. Implementation of Alternative A would have no effect on designated critical habitat for any federally listed species. There would be no impact and no mitigation measures are warranted.

C4-3.3 Alternative B – No Action

Under the No Action alternative, no development would occur within the Project Site. As such, there would be no significant direct or indirect impacts to the biological resources within or in the vicinity of the Project Site.

C4-4 Mitigation Measures

There are no mitigation measures for biological resources.

C5 CULTURAL AND PALEONTOLOGICAL RESOURCES

C5-1 Regulatory Setting

C5-1.1 Federal

National Historic Preservation Act

Section 106 of the NHPA, as amended, and its implementing regulations found in 36 CFR Part 800 require federal agencies to identify cultural resources that may be affected by actions involving federal lands, funds, or permitting and to consult with the State Historic Preservation Officer (SHPO) throughout the process. Additionally, 36 CFR 800.6(a)(1) requires the federal agency official to notify the Advisory Council on Historic Preservation of an adverse effect finding and invite them to participate in consultation to resolve adverse effects. If a historic property will be adversely affected by an undertaking, then prudent and feasible measures to resolve adverse impacts must be taken. The Advisory Council on Historic Preservation and SHPO must be provided an opportunity to review and comment on these measures prior to project implementation.

The BIA must comply with Section 106 of the NHPA for the proposed trust acquisition. The significance of resources must be evaluated using established criteria outlined in 36 CFR 60.4, as described below. If a resource is determined to be a historic property, Section 106 of the NHPA requires that effects of the federal undertaking on the resource be determined. A historic property is defined as “...any prehistoric or historic district, site, building, structure or object included in, or eligible for inclusion in the National Register of Historic Places, including artifacts, records, and material remains related to such a property...” (NHPA Sec. 301[5]). Section 106 of the NHPA prescribes specific criteria for determining whether a project would adversely affect a historic property, as defined in 36 CFR 800.5. An impact is considered adverse when prehistoric or historic archaeological sites, structures, or objects that are listed on or eligible for listing in the NRHP are subjected to the following:

- Physical destruction of or damage to all or part of the property;
- Alteration of a property;
- Removal of the property from its historic location;
- Change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance;

- Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features;
- Neglect of a property that causes its deterioration; and
- Transfer, lease, or sale of the property out of federal control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

National Register of Historic Places

The eligibility of a resource for listing in the National Register of Historic Places (NRHP) is determined by evaluating the resource using criteria defined in 36 CFR § 60.4. The quality of significance in American history, architecture, archaeology, and culture is present in districts, sites, buildings, structures, and objects of state and local importance that possess integrity of location, design, setting, materials, workmanship, feeling, association, and:

- A) That are associated with events that have made a significant contribution to the broad patterns of our history;
- B) That are associated with the lives of persons significant in our past;
- C) That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D) That have yielded, or may be likely to yield, information important to prehistory or history.

Sites younger than 50 years, unless of exceptional importance, are not eligible for listing in the NRHP. In addition to meeting at least one of the criteria listed above, the property must also retain enough integrity to enable it to convey its historic significance. The NRHP recognizes seven aspects or qualities that, in various combinations, define integrity. These seven elements of integrity are location, design, setting, materials, workmanship, feeling, and association. To retain integrity a property will always possess several, and usually most, of these aspects.

While most historic buildings and many historic archaeological properties are significant because of their association with important events, people, or styles (Criteria A, B, and C), the significance of most prehistoric and some historic-period archaeological properties is usually assessed under Criterion D. Criterion D stresses the importance of the information contained in an archaeological site rather than its intrinsic value as a surviving example of a type or its historical association with an important person or event.

Native American Graves Protection and Repatriation Act

NAGPRA (25 USC 3001 et seq.) provides a process for museums and federal agencies to return Native American cultural items – human remains, funerary objects, sacred objects, or objects of cultural patrimony – to lineal descendants, and culturally affiliated Indian tribes and Native Hawaiian organizations. NAGPRA establishes a process to address Native American human remains on federal or tribal lands.

Archaeological Resources Protection Act of 1979

The ARPA of 1979 (ARPA; Public Law 96-95; 16 USC 470aa-mm) provides for the protection of archaeological resources and sites that are on public and Indian lands and fosters increased cooperation and exchange of information between governmental authorities, the professional archaeological community, and private individuals having collections of archaeological resources and data that were obtained before October 31, 1979. ARPA also provides for penalties for noncompliance and illegal trafficking. Additionally, ARPA also establishes a permit process for archaeological excavation on federal and Indian lands, a process for prosecuting cases of damage and removal of archaeological resources, as well as trafficking artifacts.

Paleontological Resources Preservation Act

Paleontological resources are defined as the traces or remains of prehistoric plants and animals. Such remains often appear as fossilized or petrified skeletal matter, imprints, or endocasts, and reside in sedimentary rock layers. Paleontological resources are considered important for their scientific and educational value. Fossil remains of vertebrates are considered significant. Invertebrate fossils are considered significant if they function as index fossils. Index fossils are those that appear in the fossil record for a relatively short and known period of time. This allows geologists to interpret the age range of the geological formations in which they are found.

The Paleontological Resources Preservation subtitle of the Omnibus Public Land Management Act, 16 USC 470aaa to aaa-11 requires the USDA and the DOI to issue implementation regulations to provide for the preservation, management, and protection of paleontological resources on federal lands and ensure that these resources are available for current and future generations to enjoy as part of America's national heritage.

C5-1.2 Local

City of Elk Grove General Plan

The Community and Resource Protection Element of the City's General Plan addresses historical and cultural resources within the City. The City has identified the following goals related to cultural resources:

- Preserved and enhanced historic resources
- Protected cultural and tribal resources

Additionally, the General Plan identifies the following action related to archaeological and paleontological resources:

- Archaeological Resources Inventory: Maintain inventory of known archaeological resources and evaluate the potential sensitivity of future development sites related to known resources within the Planning Area using the City's Prehistoric Archaeological Sensitivity Map, in consultation with local Native American tribes.

C5-2 Environmental Setting

The following discussion is summarized from the Archaeological and Tribal Survey Report (**Appendix F**) prepared for the Proposed Project cultural resources information prepared for the Tribe and the Cultural Resources Assessment in support of the Lent Ranch SPA.

C5-2.1 Archaeological Overview

Fredrickson (1974 and 1994) proposed an analytic framework for the interpretation of central California prehistory. Fredrickson divided the temporal dimension of human history in central California into three broad periods: Paleoindian, Archaic, and Emergent periods. Since their inception by Fredrickson, these broad periods have been refined with additional radiocarbon dating and improvements made in component age correlations (e.g., White et al. 2002). More recent work by Rosenthal et al. (2007) compiled radiocarbon dates obtained in the preceding 30 years to refine the chronological framework for human habitation in the Sacramento and San Joaquin valleys. The refined chronology builds on Fredrickson and includes the following periods, which are detailed in the paragraphs below: Paleoindian (13,550 – 10,550 B.P.), Lower Archaic (10,550 – 7,550 B.P.), Middle Archaic (7,550 – 2,550 B.P.), Upper Archaic (2,550 – 850 B.P.), and Emergent (900 B.P. - historic period).

Paleoindian Period (13,500 – 10,550 B.P.)

The Paleoindian period was characterized by small, highly mobile groups occupying broad geographic areas. Evidence of occupation of northern California during this period is limited, but known tool assemblages point to the Fluted Point Tradition (FPT). The FPT is characterized by long fluted and bifacially flaked stone points. The bifaces tend to have slightly convex or parallel sides with a concave base.

Lower Archaic (10,550 – 7,550 B.P.)

Sites in the Central Valley corresponding to the Lower Archaic are primarily isolated artifacts such as stemmed projectile points and lithic crescents (Rosenthal et al. 2007).

Middle Archaic (7,550 – 2,550 B.P.)

During the Middle Archaic, two distinct settlement and subsistence systems emerged in central California, one operating in the Central Valley and another within the Sierra foothills. The riverine focus of people in the Central Valley manifested in extended residential stays, the development of specialized tool assemblages, and exotic trade items. New artifact forms appear including baked clay objects, basketry awls, and basic pottery. Inter-regional trade was well established during the Middle Archaic period. Long distance trade brought *Olivella* shell beads and *Haliotis* ornaments from coastal regions, as well as obsidian from east of the Sierra crest into the Sacramento and San Joaquin valleys.

Upper Archaic (2,550 – 900 B.P.)

The Upper Archaic period saw the rise of large village mounds around the Delta and rivers of the lower Sacramento Valley. The intensification of acorn use is visible in the greater frequency of mortars and pestles in the region, as well as preserved hulls. Imported obsidian during the Upper Archaic within the Delta was primarily coming from sources in the southern North Coast Ranges

at Borax Lake and Napa Glass Mountain. Lanceolate bifaces produced for trade from these sources are found at regional sites during the Upper Archaic.

Emergent (900 B.P. - historic)

The Emergent Period corresponds to the lifeways that were present at the time of Spanish contact with Plains Miwok and other Central California people. Settlements host semi-sedentary populations, which are focused on streams, rivers, and sloughs. The hallmark technological change during this period is the introduction of the bow and arrow between roughly 900 – 650 B.P. The Emergent Period saw the establishment of “populous towns” at significant salmon weirs in the northern Sacramento Valley and more modest mound villages around the Delta. Middens routinely include large amounts of fish bone and a wide range of mammal and bird dietary remains. Mortars and pestles become abundant during this period. Ornamental artifacts include steatite disc beads and pendants, bird bone tubular beads, and Olivella beads. Burials consist of flexed interments and cremations with a return to abundant grave goods. Evidence of trade includes brownware pottery from southwest California, coastal shell, and obsidian from the east side of the Sierra.

C5-2.2 Ethnographic Overview

The Project Site lies within the ancestral territory of the Plains Miwok and potentially the Nisenan, as their territories overlap in this general area. The Miwok were one of the largest populations in native California, with territory extending from the crest of the Sierra in the east, across the Central Valley and Delta Region, and into the Coast Range. The Plains Miwok occupied the lower reaches of the Sacramento, Cosumnes, Mokelumne, and San Joaquin rivers within the Delta and points east. The total Miwok population has been estimated to be approximately 19,500 prior to 1800, based on the accounts of early explores, early censuses, and mission records.

The settlement and subsistence patterns of the Miwok were closely correlated with the seasonal availability of economically important vegetable foods and the movements of game animals. Acorns formed a staple of the Miwok diet. Fishing was an important subsistence activity among the Plains Miwok. The Miwok hunted a variety of game species such as deer, elk, antelope, bear, and rabbits. The Miwok diet was supplemented by a number of seeds and nuts. Trade provided a context to social interaction with outside groups, as well as a means to acquire goods and raw materials that were not available within the tribelet’s territory.

Exposure to illnesses brought by the Spaniards, the Mexicans, and later the Americans, led to significant attrition rates due to diseases for which the Miwok had little or no immunity. The Plains Miwok resisted the mission system, defended their land from settlers, and fought early attempts to sequester them. Today Wilton Rancheria carries on the long-standing traditions of the Miwok people and are among several federally-recognized Miwok tribes in California.

The closest ethnographic habitation sites to the Project Site are Chuyumkatat and Newachumne. Newachumne is located approximately 1.5 mile southeast of the Project Site. Chuyumkatat is located approximately 1.2 mile southeast of the APE.

C5-2.3 Historic Setting

Following the settlement of San Diego in 1769, the Spanish made steady progress in the exploration and settlement of the coastal regions of Alta California. By 1794, a mission had been established at San Jose, and many Coast Miwok were taken by force to provide labor. By the early 19th century, the various Miwok bands were resisting the mission system and colonization. In 1821 Mexican forces prevailed in their struggle for independence from Spain and declared California part of the Mexican empire. Beginning in 1833, the Mexican governors in Alta California granted large land holdings, formerly mission lands, to native and naturalized Mexican citizens. The Sacramento area was not permanently settled by non-Natives until 1839 when John Sutter landed on the south bank of the American River.

The Bear Flag Revolt was a pivotal event in California's history, which took place in June 1846, during the Mexican-American War. Tensions between American settlers and Mexican authorities had been rising, and a group of about 30 American settlers, led by William B. Ide, sought to assert their independence. Shortly after the revolt, American forces under the command of John C. Fremont helped solidify American control over the region.

The California Gold Rush further fueled the decline of indigenous people throughout the State. As thousands of emigrants came to California, the native people were overwhelmed, displaced, abused, and murdered. Newcomers from around the world transformed the region's demographics and economy. This period of rapid growth and migration paved the way for California's admission to the Union as the 31st state on September 9, 1850.

The project area was a remote part of the original Murphy's Ranch assembled by Martin Murphy Jr. around 1845. In 1846, American settlers overpowered and took the horses of Mexican soldiers from Murphy's corral. The ranch was sold in 1856 wherein the land transferred ownership several times until the McConnel Brothers acquired the property. During their ownership, the brothers operated a small grocery and supply business before raising high-grade sheep. McGillveray acquired the land in the late 1920s, operating a large construction company in the Sacramento region. He constructed a large Spanish-style home during 1929 before losing his fortune during the Great Depression. Henry and Sophie Lent acquired the home and land in 1939 and operated it as a ranch.

C5-2.4 Paleontological Resources

An online search of the University of California Museum of Paleontology (UCMP) specimen records noted 126 specimens in Sacramento County, with the majority from the Teichert Gravel Pit E 1 (UCMP, 2025). No fossil resources were mentioned in the 2000 Lent Ranch Marketplace EIR or the 1998 Cultural Resource Assessment for the Lent Ranch General Plan Amendment and Rezone (City of Elk Grove, 2000).

C5-3 Impact Assessment

C5-3.1 Assessment Criteria

A significant effect would occur if development were to result in physical destruction, alteration, removal, neglect, or change in characteristics or reduction of integrity of historic features of a cultural resource. A significant effect to paleontological resources would occur if development were to result in damage or destruction of fossils that provide significant nonrenewable taphonomic, taxonomic, phylogenic, ecologic, or stratigraphic information.

C5-3.2 Methodology

A cultural resources assessment of the Project Site was conducted by Peak & Associates Inc. in August 1998 for the 2000 Lent Ranch Marketplace Draft EIR (City of Elk Grove, 1998). In February 2026, the Wilton Rancheria Department of Cultural Preservation prepared an Archaeological and Tribal Survey Report (**Appendix F**), which includes the results of a records search completed on January 23, 2026 and an archaeological field survey on January 26, 2026. These efforts were to identify and evaluate any prehistoric and historic-period resources within or adjacent to the Project Site that may be impacted by the Proposed Action. The 2026 survey identified an isolated basalt flake on the Project Site. It was determined that the isolated resource is not subject to management recommendations/protection.

C5-3.3 Alternative A – Proposed Project

Cultural Resources

No new archaeological or historic resources eligible for federal or State listing were identified as a result of the surveys performed in 1998 and 2026. Two previously recorded historic buildings are located off-site and within a quarter mile of the Project Site. The 1998 cultural resources assessment for the Lent Ranch Marketplace Draft EIR determined that these off-site buildings did not possess the values that would make them eligible for listing and thus would not be affected indirectly by development of the Lent Ranch SPA. The 2026 cultural resources report concurs with this determination. Therefore, development of Alternative A would not result in impacts to known cultural resources.

The Project Site is underlain by San Joaquin series soils, which are alluvium deposits derived primarily from granitic rock. These soils are classified as Alfisols and date to the Pleistocene epoch (about 2.6 million to 11,700 years ago), potentially pre-dating human occupation (City of Elk Grove, 2018). Moreover, the Project Site is disturbed due to previous development and historical agricultural uses. During the January 2026 field survey, an isolated basalt flake was identified within the Project Site, documented, and left in place. The flake is an isolated cultural item and is therefore not subject to management recommendations. As designed, Alternative A is not anticipated to cause a substantial adverse change in the significance of a historic property as defined in 36 CFR 800.5(a)(1). The potential for the presence of intact buried archaeological deposits within the site is low. However, there is the unlikely possibility that previously unknown cultural resources could be encountered during ground disturbing activities on the Project Site.

Development proposed as a part of this undertaking may adversely affect previously unknown subsurface prehistoric or historic archaeological resources during construction, including human remains. Mitigation measures for the protection and treatment of unanticipated discoveries of archaeological resources and/or human remains are presented in **Section C5-4**. Impacts to archaeological resources would be less than significant with mitigation.

Paleontological Resources

No paleontological resources have been reported or observed on or in the vicinity of the Project Site. The alluvial deposits identified as underlaying the site have a low potential for yielding unique paleontological resources (City of Elk Grove, 2000). Moreover, much of the Project Site has been previously developed or disturbed by agricultural uses. Therefore, Alternative A would not result in significant adverse impacts to known paleontological resources. Although the possibility is low, previously unknown paleontological resources could be discovered during earth-moving activities. Mitigation measures are presented in **Section C5-4** for the treatment of unanticipated paleontological discoveries. Impacts to paleontological resources would be less than significant with mitigation.

C5-3.4 Alternative B – No Action

Under the No Action alternative the Project Site would not be placed in trust for the benefit of the Tribe and no development would occur. Therefore, there would be no impacts to cultural or paleontological resources.

C5-4 Mitigation Measures

The following mitigation measures apply to Alternative A:

Inadvertent Discovery Protocols

Cultural Resources

- In the event of inadvertent discovery of prehistoric or historic archaeological resources during construction-related activities, such finds shall be subject to Section 106 of the National Historic Preservation Act as amended (36 CFR 800), and the BIA and Tribal Historic Preservation Officer (THPO) shall be notified. Specifically, procedures for post-review discoveries without prior planning pursuant to 36 CFR 800.13 shall be followed.
- Work within 50 feet of the find shall be halted until a professional archaeologist meeting the Secretary of the Interior's qualifications (36 CFR 61) can assess the significance.
- If any find is determined to be significant by the archaeologist, then representatives of the Tribe shall meet with the archaeologist to determine the appropriate course of action, including the development of a treatment plan, if necessary.

Paleontological Resources

- In the event of inadvertent discovery of paleontological resources during construction-related activities, such finds shall be subject to Section 101 (b)(4) of NEPA and the BIA and Tribe shall be notified. Work within 50 feet of the find shall be halted until a professional paleontologist can assess the significance.

- If the find is determined to be significant by the paleontologist, then representatives of the BIA and Tribe shall meet with the paleontologist to determine the appropriate course of action, including the development of an evaluation report and/or mitigation plan, if necessary.

Human Remains

- If human remains are discovered during ground-disturbing activities, work within 100 feet of the find shall be halted. The THPO, BIA, and County Coroner shall be contacted immediately, and the County Coroner shall determine whether the remains are the result of criminal activity; if possible, a human osteologist should be contacted as well.
- If Native American, the provisions of the Native American Grave Protection and Repatriation Act (NAGPRA) shall apply to the treatment and disposition of the remains.
- Construction shall not resume in the vicinity until final disposition of the remains has been determined.

C6 SOCIOECONOMIC CONDITIONS

C6-1 Regulatory Setting

There are no applicable regulations.

C6-2 Environmental Setting

C6-2.1 Demographics

Demographic data for City of Elk Grove, Sacramento County, and the State of California is presented in **Table C6-1**. The Project Site is within the City of Elk Grove, which had a population of approximately 182,797 in 2024. Additional socioeconomic data for the local, regional, and State area are summarized in **Table C6-1**. As shown in **Table C6-2**, the Project Site is located in Census Tract 96.52 as designated by the U.S. Census Bureau (U.S. Census Bureau, 2025). **Table C6-2** presents demographic data and **Table C6-3** presents mean household income levels and household sizes for Census Tract 191.52 and adjacent census tracts.

Table C6-1: Socioeconomic Data

Census Data Type	City of Elk Grove	Sacramento County	California State
Demographics¹			
Population 2024 from U.S. Census	182,797	1,585,055	39,538,223
Median household income (2024 dollars), 2024	\$125,924	\$90,252	\$99,122
Persons in poverty, 2024	8.0%	11.8%	12.0%
Race and Ethnicity (2020)²			
Black or African American alone	17,854	152,795	2,237,044
American Indian and Alaska Native alone	1,404	18,637	631,016
Asian alone	58,982	281,733	6,085,947
Native Hawaiian and Other Pacific Islander alone	2,560	18,914	157,263

Census Data Type	City of Elk Grove	Sacramento County	California State
Two or more races	24,374	211,669	5,760,235
Hispanic or Latino	33,392	374,434	15,579,652
White alone, not Hispanic or Latino	57,371	715,722	16,296,122
Minority population ⁴	67.4%	54.8%	58.8%
Employment			
Employment Rate 2023 ²	60.5%	60.1%	60.2%
Unemployment Rate July 2025 ^{3,6}	4.9%	5.3%	5.7%
Housing⁷			
Housing units, 2024	60,068	612,589	14,949,001
Vacancy rate	2.4% ⁵	4.0% ⁵	6.4% ⁵

Source: 1. U.S. Census Bureau, 2026; 2.U.S. Census Bureau, 2025; 3. California Employment Development Department, 2025a; 4. Calculated as 100% less the White alone, not Hispanic or Latino percentage; 5. Vacancy rate calculated from 2024 vacancy units;6. California Employment Development Department, 2025b; 7. California Department of Finance Demographic Research Unit, 2025

Table C6-2: 2020 Population Demographics by Census Tract

Race	96.52 (Project Site)	93.09	93.10	93.36	96.37	96.50	96.51	96.53
Total Population ¹	3,810	2,424	7,303	3,850	6,374	3,455	5,683	3,282
Hispanic or Latino	473	468	1,898	18	963	440	694	859
Two or More Races	403	327	1,178	481	731	405	617	260
Native Hawaiian and Other Pacifica Islander	60	19	53	18	147	45	34	44
Asian	2,036	200	650	616	2,812	1,965	2,623	618
American Indian and Alaskan Native	15	51	93	53	65	10	24	28
Black or African American	415	66	322	125	856	310	492	598
White Alone, not Hispanic or Latino	691	1,572	4,214	2,054	1,409	575	1,651	1,170
Minority % ¹	81.2%	35.2%	42.3%	46.7%	77.9%	83.4%	71.0%	64.4%

Source: U.S. Census Bureau, 2025

Note that individual columns do not add to *Total Population* because of double counting in some categories.

¹ Calculated as 100% less the White alone, not Hispanic or Latino percentage

C6-2.2 Economy and Unemployment Data

As shown in **Table C6-3**, City had an estimated median household income of \$125,924 in 2024, which was approximately 27% higher than the State average of \$99,122. The estimated median household income for Census Tract 96.52 in 2023 was \$124,574, which was well above the established 2025 poverty threshold of \$32,150 for a household of 4 individuals (**Table C6-3**).

The employment rate in the State was approximately 60.2% in 2025 while the unemployment rate was approximately 5.2%. The unemployment rate was approximately 4.9% and 5.5% for the City and County while the employment rate was approximately 60.5% and 60.1%, respectively (Table C6-1).

C6-2.3 Housing

In 2024, the State was estimated to have approximately 14,949,001 housing units, of which approximately 955,683 units (6.4%) were vacant (Table C6-1), the County had approximately 612,589 housing units, of which approximately 24,293 (4.0%) were vacant, and the City had approximately 60,068 housing units, of which approximately 1,435 (2.4%) were vacant (Table C6-1).

Table C6-3: Household Income – Project Site and Nearby Census Tracts

Census Tract or Location	Median Household Income ¹	Average Household Size ¹	Poverty Threshold ²
Project Site			
96.52	\$124,574	3.75	\$32,150
Vicinity			
93.09	\$105,625	3.48	\$26,650
93.10	\$103,448	3.35	\$26,650
93.36	\$147,266	3.54	\$32,150
96.37	\$155,625	4.18	\$32,150
96.50	\$177,350	3.82	\$32,150
96.51	\$105,640	3.51	\$32,150
96.53	\$122,083	3.63	\$32,150
City of Elk Grove	\$119,330	3.66	\$32,150
Sacramento County	\$90,252	3.35	\$26,650
California State	\$95,521	3.36	\$26,650

1. Source: U.S. Census Bureau, 2025; 1-year estimate for 2023

2 Source: Health and Human Services Department, 2025. 2025 poverty thresholds used, and poverty thresholds were based on house sizes that were rounded to the nearest whole number

C6-2.4 Property Taxes

A total of \$472,901.58 in property taxes were due for the Project Site during the 2024-2025 fiscal year (Table C6-4). The 2024-2025 property tax roll in the County was estimated to be approximately \$2.3 billion (The Sacramento Bee, 2024).

C6-3 Impact Assessment

C6-3.1 Assessment Criteria

A socioeconomic impact would be considered significant if Alternative A were to result in adverse physical environmental effects, such as blight, from economic decline, rising unemployment, substantial strain on the local housing supply, a measurable increase in crime, or a financial burden on public services such as law enforcement and fire protection.

Table C6-4: Property Taxes by Parcel

APN	Property Tax
134-1010-002-0000	\$11,874.26
134-1010-003-0000	\$15,916.72
134-1010-004-0000	\$232,244.72
134-1030-004-0000	\$9,996.18
134-1030-005-0000	\$9,126.50
134-1030-006-0000	\$10,215.52
134-1030-007-0000	\$11,247.48
134-1030-008-0000	\$160,414.04
134-1030-009-0000	\$11,866.16
Total	\$472,901.58

Source: County of Sacramento, 2025

C6-3.2 Alternative A – Proposed Project

Employment and Economy

Alternative A would introduce commercial development consistent with the Lent Ranch SPA, with up to 550,000 square feet of building space. These uses could include retail, restaurant, office, entertainment, hospitality, and residential. While specific tenanting and phasing plans are not yet proposed, Alternative A would be expected to generate both temporary construction jobs and permanent employment across a range of skill levels. Alternative A would provide employment opportunities for the Tribe and the larger regional population. In 2023, Elk Grove reported a relatively high median income (\$119,330) and a low unemployment rate (4.9%), suggesting a stable economic environment for absorbing and supporting new job growth. Employment effects would be positive but modest in regional terms because the area already includes significant commercial development and an active work force. Overall, this impact would be beneficial.

Fiscal Impacts

If the Project Site is placed into federal trust, the Tribe would no longer pay property taxes on the land. During the 2024–2025 fiscal year, total property taxes for the parcels that constitute the Project Site were \$472,901.58. This represents approximately 0.021% of Sacramento County’s total \$2.3 billion property tax roll. The loss in annual tax revenue would be minor in the context of the County’s overall budget. Furthermore, although development would remove these parcels from the property tax base, future commercial operations would generate indirect fiscal benefits to the local economy through jobs and spending at nearby businesses. Because a portion of property taxes are associated with the provisions of public services, mitigation in **Section 4.0** would be implemented to provide financial compensation for the increase in service calls to the Project Site (further discussed below). This impact is less than significant with mitigation.

Public Safety

The City of Elk Grove Police Department and CCSF Fire Department would provide law enforcement and fire protection/emergency services to the Project Site once in trust, similar to services in place for the adjacent Sky River Casino.

The Tribe has existing MOUs with the City of Elk Grove and the CCSD Fire Department. Alternative A is expected to result in an incremental increase in calls for public services, consistent with developments of similar type and scale. These increases would not be expected to result in disproportionately higher crime rates compared to similar commercial mixed-use developments. However, the increase in the demands on police and fire services could affect local response capacity. To address this potential impact, mitigation is included in **Section C6-4** that for coordination with service providers to revise the existing MOUs as necessary to ensure coverage that is proportionate to the needs of Alternative A. Implementation of mitigation would ensure that services are provided and adequately compensated with the level of development, thereby reducing potential impacts on public safety resources to a less-than-significant level.

Housing and Growth Inducement

Alternative A could include multi-family housing, similar to other mixed-use commercial development, though the overall development would remain commercial in nature. As of 2020, the City of Elk Grove had over 56,000 housing units with a 2.3% vacancy rate, which is lower than the State and County averages and suggests a potential housing shortage. Given the site's location within a planned growth area and the modest number of potential new households, no substantial impact on local housing markets is expected. Furthermore, Alternative A would not extend roadways or utilities into previously undeveloped areas. Water, wastewater, electrical, and natural gas services would be provided by existing public utility agencies through infrastructure already planned or installed under the Lent Ranch SPA. Alternative A would not remove existing barriers to growth or facilitate new development beyond what is already anticipated for the area. Impacts would be less than significant and no mitigation is warranted.

C6-3.3 Alternative B – No Action

Under the No Action alternative, the Tribe would not receive any of the benefits associated with the development on the Project Site. The Project Site would not be brought into trust and would remain on the County's property tax rolls. No additional development would occur on the Project Site.

C6-4 Mitigation Measures

The following mitigation measures apply to Alternative A:

Public Safety Coordination

The Tribe shall make good faith efforts to amend its existing MOUs or enter into new service agreements with the City of Elk Grove and the CCSD Fire Department to ensure adequate provision of law enforcement, fire protection, and emergency medical services to the Project Site prior to occupancy.

C7 TRANSPORTATION AND CIRCULATION

C7-1 Regulatory Setting

C7-1.1 State and Local

California Department of Transportation

The California Department of Transportation (Caltrans) is the State agency responsible for the design, construction, maintenance, and operation of the California State Highway System, as well as the segments of the Interstate Highway System that lie within California. Caltrans District 3 is responsible for the operation and maintenance of SR-99 in the vicinity of the Project Site. Caltrans requires a transportation permit for any transport of heavy construction equipment or materials that necessitates the use of oversized vehicles on State highways.

Sacramento County General Plan

The Circulation Element of the Sacramento County General Plan provides the countywide framework for transportation planning, guiding investment in infrastructure to ensure safe, efficient, and sustainable mobility. The Circulation Element was amended in October 25, 2022, and emphasizes creating a balanced, multi-modal transportation system that provides residents with choices across cars, public transit, biking, and walking (Sacramento County, 2022). Key components of the Circulation Element include:

- Transportation Plan – Establishes roadway classifications (freeways, arterials, collectors, locals), grade separations, wildlife crossings, and project timing (pre-2030, post-2030).
- Transit Strategy – Supports light rail, bus rapid transit, regional rail, and shuttles to reduce reliance on automobiles.
- Active Transportation – Expands bicycle and pedestrian infrastructure to improve health, safety, and connectivity.
- Capital SouthEast Connector – A 35-mile multi-jurisdictional roadway linking Elk Grove, Rancho Cordova, Folsom, and El Dorado Hills.
- Policy Framework – Goals, policies, and implementation across mobility, roads, transit, active transportation, transportation management, rail, and air travel.
- Scenic Highways & Corridors – Preserves the aesthetic and environmental value of scenic roads and river corridors.
- Land Use Integration – Coordinates land use and transportation planning to reduce vehicle miles traveled (VMT), support growth, and maintain community livability.

In summary, the Circulation Element is Sacramento County's blueprint for a safe, interconnected, and sustainable transportation future that balances economic growth, mobility, and environmental stewardship.

Elk Grove General Plan

Chapter 6: Mobility of the Elk Grove General Plan focuses on creating a safe, connected, and sustainable mobility system for Elk Grove that reduces car dependence, enhances transit and active transportation, supports regional connectivity, and prepares for climate and technology

changes (City of Elk Grove, 2023). It is comprised of the following components:

- Purpose: Establishes a comprehensive framework for Elk Grove’s transportation system to support safe, efficient, and sustainable movement of people and goods.
- Circulation System: Lays out a multimodal network—roads, transit, bike, pedestrian, and trails—emphasizing complete streets that balance cars with active and public transport.
- Vehicle Miles Traveled (VMT): Sets thresholds for evaluating projects’ transportation impacts, requiring reductions in VMT compared to citywide averages to meet state climate and air quality goals.
- Transit: Promotes expanded bus service, integration with SacRT light rail, and planning for regional rail (future Elk Grove station).
- Active Transportation: Expands the bicycle, pedestrian, and trails network to improve connectivity, safety, and recreation.
- Roadway System: Maintains arterial and collector road hierarchies, accommodates goods movement, and integrates regional projects like the Capital SouthEast Connector.
- Emerging Mobility: Encourages adoption of electric vehicles, shared mobility, and new transportation technologies.
- Resilience: Incorporates climate adaptation by addressing flooding, extreme heat, and fiscal sustainability as mobility shifts away from fuel taxes.

Goals and policies are generally focused on reducing reliance on single-occupancy vehicles, improving accessibility for all users (including seniors and people with disabilities), coordinating transportation and land use to support compact, mixed-use development, and ensuring environmental sustainability and GHG reductions.

Lent Ranch Marketplace Special Planning Area

The City of Elk Grove approved the Lent Ranch SPA after environmental review in 2001 and its amendments in 2014. The Lent Ranch SPA outlines goals for the planning area, including the following goals related to transportation and circulation:

- To reduce overall vehicle miles traveled by City residents to access commercial opportunities in the region, and hence reduce vehicular air and noise emissions, by providing a mix of land uses locally, some of which are only available over ten miles north of the City limits.
- To provide the infrastructure necessary to meet development needs in an efficient and cost-effective manner.
- To locate the Project on a site with direct access and frontage along a freeway and major roadways, thus providing safe and convenient customer and employee access.
- To develop a unified site plan that provides convenient access, excellent vehicular and pedestrian circulation and ample parking.

C7-2 Environmental Setting

C7-2.1 Roadways

Regional access to the Project Site is primarily provided from SR-99 by the Grant Line Road interchange and Kammerer Road. Additional regional access to the Project Site includes less direct routes from SR-99 and Interstate 5 (I-5) via Elk Grove Boulevard, West Stockton Boulevard, Hood Franklin Road, Bruceville Road, Poppy Ridge Road, and Kammerer Road. Roadways providing local access to Project Site include the following (see Figure 4 of **Appendix A**):

- Kammerer Road is an east-west arterial roadway connecting Bruceville Road to the west with Promenade Parkway to the east. To the east of Promenade Parkway, Kammerer Road continues as Grant Line Road. There are at total of five existing driveway stubs along Kammerer Road that provide access to the future internal circulation network of the Project Site's southernmost parcels (two west of and three east of Lent Ranch Parkway).
- Grant Line Road is an east-west arterial roadway connecting Promenade Parkway to the west with White Rock Road to the east. To the west of Promenade Parkway, Grant Line Road continues as Kammerer Road.
- Promenade Parkway is a north-south arterial roadway connecting Kammerer Road/Promenade Parkway to the south with the northern boundary of the Lent Ranch Specific Plan area, where it continues as West Stockton Boulevard. There are at total of three existing driveway stubs along Promenade Parkway that provide access to the future internal circulation network of the Project Site's southernmost parcels (two south of and one north of Lent Ranch Parkway). Additionally, a fourth driveway provides access to the future internal circulation network of the Project Site's northernmost parcels.
- Lent Ranch Parkway is a short north-south arterial roadway connecting Kammerer Road to the south with Promenade Parkway to the north. There are at total of five existing driveway stubs along Lent Ranch Parkway that provide access to the future internal circulation network of the Project Site's southernmost parcels (two along the west side and three along the east side of the roadway).
- Bilby Road is an east-west collector roadway connecting Lotz Parkway to the west with Promenade Parkway to the east. East of Promenade Parkway, Bilby Road continues as Sky River Parkway, providing access to the Sky River Casino. There are two existing driveway stubs along Bilby Road that provide access to the future internal circulation network of the Project Site's southernmost parcels.
- Kyler Road is an east-west collector roadway connecting Big Horn Boulevard to the west with Promenade Parkway to the east. To the east of Promenade Parkway, Kyler Road continues as a dead-end driveway leading to the Kaiser Permanente Elk Grove Promenade Medical Office. It is along this dead-end driveway where there are three existing driveway stubs that provide access to the future internal circulation network of the Project Site's northernmost parcels.

C7-2.2 Pedestrian and Bicycle Facilities

As part of the buildout of the circulation network associated with the Lent Ranch SPA, sidewalks and dedicated bicycle lanes are provided on most of the local roadway facilities described above.

Exceptions on roadways adjacent to the Project Site are along Kammerer Road where there are no designated bicycle lanes, and along the Kyler Road dead-end driveway east of Promenade Parkway where there are no sidewalks.

C7-2.3 Transit Service

Transit service is provided by Sacramento Regional Transit (SacRT) with Route E110 (Sky River Casino to Cosumnes River College) operating along Promenade Parkway (SacRT, 2025). Buses on this route operate every 30 minutes Monday – Friday from 6:00 am to 9:00 pm, and hourly on Saturdays from 6:30 am to 5:30 pm.

C7-3 Impact Assessment

C7-3.1 Assessment Criteria

Impacts to the transportation system would be significant if development were to increase traffic volumes such that traffic exceeded the design capacity of the roadway or resulted in adverse effects to pedestrians, bicyclists, or transit service after implementation of feasible mitigation measures. Development would also be considered to have a significant traffic-related impact if it were to cause a deterioration in traffic operations at nearby intersections, roadway segments, freeway ramps, or freeway mainline segments to below acceptable standards specified by the jurisdictional authority.

C7-3.2 Alternative A – Proposed Project

Construction Traffic

During construction of Alternative A, additional temporary trips would be generated on the weekdays with construction work occurring during daytime hours between 7:00 a.m. and 7:00 p.m. The worker arrival peak would be between 6:00 a.m. and 7:00 a.m. and the departure peak would be between 3:30 p.m. and 4:30 p.m. These peak commute times partially coincide with local commute times. The increase in traffic on nearby roadways due to construction worker commute trips would generally be small, and the additional trips would only occur during construction. Based on project assumptions developed as part of the air quality modeling effort for Alternative A (**Appendix D**), the maximum number of vehicle trips generated by construction workers would occur during the building construction phase. During this approximately six-month construction phase, up to 88 workers are expected to travel to/from the Project Site daily, resulting in a total of 176 one-way trips. Additionally, there would be truckloads of material hauling and construction vendor trips during construction. These trips would primarily occur outside of the peak commute hours for the surrounding roadway network and equipment would be moved on and off the Project Site on different days. The periodic delivery and removal of such equipment during mostly off-peak hours would constitute a minimal disruption of existing traffic on roadways near the Project Site. The relatively small number of trips required to make such deliveries and removals would not result in a noticeable change to existing traffic volumes or capacities on the surrounding roadway network.

A standard BMP has been included in **Appendix B** to reduce potential construction impacts associated with traffic. In order to minimize potential conflicts between construction activity and through traffic, a construction traffic control plan would be developed for use during construction activity. The plan would identify traffic control measures, signs, and delineators to be implemented by the construction contractor during of construction. Construction traffic would be controlled in accordance with the Caltrans Traffic Manual and City standards. Because the majority of vehicle trips associated with construction activities would occur during off-peak hours and with implementation of a traffic control plan, potential impacts would be less than significant.

Operational Traffic

A technical memorandum that provides a comparison of the trip generation estimated for Alternative A versus the trip generation calculated for the same parcels in the approved Lent Ranch Marketplace EIR (City of Elk Grove, 2000) is included in **Appendix G**. The comparison of daily, AM peak hour, and PM peak hour trip generation is shown in **Table C7-1**. The comparison found that Alternative A would generate fewer vehicle trips for all evaluated time periods as compared to the vehicle trips that would be generated by development of the same parcels envisioned in the Lent Ranch SPA.

Table C7-1: Project Trip Generation Comparison

	Daily	AM Peak Hour	PM Peak Hour
Alternative A (Proposed Project)	20,356	462	1,870
Lent Ranch Specific Plan	24,280	486	2,367
Difference	-3,924 (-18%)	-24 (-5%)	-497 (-23%)

Source: **Appendix G**

The Lent Ranch Marketplace EIR identified 14 mitigation measures to address off-site traffic impacts that would result from full build-out of the Lent Ranch SPA, which includes additional parcels outside of the Project Site, some of which have already been developed. Some transportation improvements included in these mitigation measures have already been completed, while the implementation of others are either in progress or have not yet begun construction (e.g., Kammerer Road Extension from Interstate 5 to Bruceville Road). Mitigation in **Section C7-4** (see below) would be implemented to address potential traffic impacts associated with Alternative A. The existing MOU between the Tribe and City of Elk Grove would be revised to address an appropriate fair-share contribution. Therefore, impacts would be less than significant with mitigation.

Bicycle and Pedestrian Facilities and Transit Service

Based on the proposed land use and the car-oriented nature of the surrounding area, Alternative A would not generate a large amount of pedestrian and bicycling activity, or transit riders along roadways adjacent to and within the Project Site or the other public roads in the area. Any new pedestrian or bicycle trips generated by Alternative A could be safely accommodated on designated pedestrian and bicycle facilities that have already been developed adjacent to roadways in the Lent Ranch SPA. Transit access to the northernmost parcels can be accommodated via the existing SacRT Route E110 bus stop on Promenade Parkway.

For the southernmost parcels, bus stops and shelters have already been developed along Lent Ranch Parkway, the southern end of Promenade Parkway, and Kammerer Road in anticipation of future development in the Lent Ranch SPA. These bus stops could easily be included as part of Route E110, as buses already travel along these roadways as part of the existing route. Thus, no significant impacts would occur to bicycle and pedestrian facilities or to transit service, and no mitigation measures are warranted.

C7-3.3 Alternative B – No Action

Under the No Action alternative, there would be no additional development constructed on the Project Site, and consequently no increase in vehicular traffic on roadways in the vicinity of the Project Site. There would be no change in pedestrian, bicycle, or transit circumstances.

C7-4 Mitigation Measures

The following mitigation measures apply to Alternative A:

Amend Memorandum of Understanding

The existing MOU between the Tribe and City of Elk Grove shall be revised to address an appropriate fair-share contribution associated with added trips generated by Alternative A. The Tribe or lessees shall set appropriate funds aside in a dedicated account to fund its fair-share contribution toward future vicinity roadway maintenance and improvements.

C8 LAND USE

C8-1 Regulatory Setting

C8-1.1 Federal

Farmland Protection Policy Act

The FPPA is intended to minimize the impact federal programs have on the unnecessary and irreversible conversion of farmland to non-agricultural uses. It assures that federal programs are administered in a matter that is compatible with state and local units of government, and private programs and policies to protect farmland (7 U.S.C. § 4201). The NRCS is responsible for the implementation of the FPPA and categorizes farmland in a number of ways. These categories include prime farmland, farmland of statewide importance, and unique farmland. Prime farmland is considered to have the best possible features to sustain long-term productivity. Farmland of statewide importance includes farmland similar to prime farmland, but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Unique farmland is characterized by inferior soils and, depending on climate, generally needs irrigation. Urban areas, as identified by the U.S. Census Bureau, are not considered farmland and are exempted from the FPPA (FPPA Section 523.10). The NRCS fulfills the directives of the Soil and Water Conservation Act (16 USC § 2001-2009) by identifying significant areas of concern for the protection of national resources. NRCS uses a land evaluation and site assessment system to establish a Farmland Conversion Impact Rating (FCIR) score.

The total FCIR score is used as an indicator for the project's sponsor to consider alternative sites if the potential adverse impacts on the farmland exceed the allowable level; however, the FPPA does not require federal agencies to alter projects to avoid or minimize farmland conversion. Sites receiving a combined score of less than 160 (out of 260 possible points) do not require further evaluation. For sites with a combined score greater than 160 points, at least two other alternatives are required to be considered and the alternative with the lowest number of points selected unless there are other overriding considerations.

Federal Aviation Regulation

In accordance with 14 CFR 77, which provides requirements, standards, and processes for determining obstructions to air navigation, the Federal Aviation Administration's (FAA's) primary objective is to promote air safety and the efficient use of the navigable airspace. In furthering this mission, the FAA conducts aeronautical studies based on information provided on FAA Form 7460-1, Notice of Proposed Construction or Alteration, by proponents of construction or development in the vicinity of airports. Developers must file Form 7460-1 with the FAA at least 45 days prior to construction if any of the following parameters are met:

- Proposed structure(s) will exceed 200 feet above ground level;
- Proposed structure(s) will be in proximity to an airport and will exceed the slope ratio;
- Proposed structure(s) involves construction of a traverseway (i.e., highway, railroad, waterway, etc.) and once adjusted upward with the appropriate vertical distance would exceed a standard of 77.9(a) or (b);
- Proposed structure(s) will emit frequencies, and do/does not meet the conditions of the FAA Colocation Policy;
- Proposed structure(s) will be in an instrument approach area and might exceed part 77 Subpart C;
- Proposed structure(s) will be in proximity to a navigation facility and may impact the assurance of navigation signal reception;
- Proposed structure(s) will be on an airport or heliport; or
- Filing has been requested by the FAA.

C8-1.2 State and Local

Right to Farm Act

California Civil Code Section 3482.5, also known as the Right to Farm Act, contains provisions to ensure that agricultural operations are not considered nuisances, so long as they do not obstruct navigable waterways or public areas. This ordinance supersedes any conflicting local regulations but does not prohibit local jurisdictions from adopting ordinances that allow notification to those in close proximity to an agricultural activity that they are subject to the provisions of the Right to Farm Act.

Williamson Act

The California Land Conservation Act of 1965, commonly known as the Williamson Act, is designed to preserve farmlands and open space lands by discouraging premature and unnecessary conversion to urban uses.

Under the provisions of the Williamson Act, landowners contract with the county to maintain agricultural or open space use of their lands in return for a reduced property tax assessment. The contract is self-renewing, and the landowner may notify the county at any time of intent to withdraw the land from its preserve status. Withdrawal involves a 10-year period of tax adjustment to full market value before protected open space can be converted to urban uses. Alternatively, landowners can petition the County to withdraw prematurely from a Williamson Contract. In order to cancel a contract without instituting the 10-year tax adjustment period, the County must make the required findings that the cancellation is consistent with the purposes of the Williamson Act, and that cancellation is in the public interest.

City of Elk Grove General Plan

The various elements in the General Plan guide planning decisions in the City, with the goal to implement the City's vision in a manner that reflects the issues of importance to the community. The Urban and Rural Development Element of the General Plan contains goals regarding land use and agriculture as follows.

Urban and Rural Development Element

The General Plan Urban and Rural Development Element contains goals, objectives, and policies to guide development within the City.

Goal LU-1: A Coordinated Development Pattern. To reinforce Elk Grove's commitment to fostering more complete urban spaces and employment centers while preserving traditional neighborhoods and rural areas, the following policies promote the City's economic well-being by setting aside lands for uses that will generate employment. The policies also promote the creation of safe, livable, and complete neighborhoods where daily activities may be accomplished within a short walking distance.

Policy LU-1-2: Foster development patterns that will achieve a complete community in Elk Grove, particularly with respect to increasing jobs and economic development and increasing the City's jobs-to-employed resident ratio while recognizing the importance of housing and a resident workforce.

Policy LU-1-6: Support the development of neighborhood-serving commercial uses adjacent to residential areas that provide quality, convenient, and community-serving retail choices in a manner that does not impact neighborhood character.

Goal LU-2: A Focus on Infill. Properties that are vacant or in some way underutilized and surrounded by development on multiple sides are considered potential infill sites by the City. The City supports the development of these infill sites into economically viable projects that contribute to the community's overall fabric. These sites can contribute space for offices, manufacturing, or light industrial employment, satisfy the retail and service needs of the surrounding neighborhood, and/or provide for the housing needs of the community.

Policy LU-2-1: Promote a greater concentration of high-density residential, office commercial or mixed-use sites and the population along identified transit corridors and existing commercial corridors, in activity centers, and at other appropriate locations.

Goal AG-1: Integrated and Sustained Agriculture. Land in agricultural production is located adjacent to residential and commercial uses in Elk Grove. While many residents value rural living, agricultural production uses can conflict with other land uses. Typical causes of conflict include noise from harvest or production equipment, poor air quality from dust, or odors produced by livestock. However, Elk Grove recognizes the importance of and supports the continuation of agricultural activities.

Policy AG-1-2: As appropriate, protect agricultural lands from conversion.

Lent Ranch Marketplace Special Planning Area

The Lent Ranch SPA outlines the land uses planned for the SPA and their corresponding standards. The Lent Ranch SPA identifies five different land uses for the planning area, although only two apply to Alternative A: Community Commercial and Office and Entertainment.

Community Commercial

Intent: The Community Commercial land use creates, preserves and enhances opportunities for businesses that provide a variety of goods and services serving a community or regional market. The Community Commercial districts provide for the grouping of retail and service uses that are compatible in the types of commodities sold, the scope of services provided or the method of operation.

The Community Commercial districts may contain large-format (power center) and mid-size stores, offices and community commercial retail uses. Smaller businesses that benefit from the customer drawing power of the larger stores and provide specialty goods and services are envisioned in the Community Commercial land use.

The Community Commercial districts are transitional zones between the residential neighborhoods to the north and west and the Regional Mall to the east.

Uses Envisioned: Large-format retailers (such as home improvement stores, wholesale retailers, outlet retailers) greater than 60,000 square feet; mid-size retailers (such as office supply, clothing stores, sporting goods, books, music stores, drugstores etc.) typically of less than 60,000 square feet; home accessory stores (linens, furniture); discount and retail outlets; grocery market and food stores (approximately 30,000 to 70,000 square feet); drugstores; smaller retailers and specialty users (less than 20,000 square feet) arranged in clusters or located in pads along West Stockton Boulevard or Lent Ranch Parkway; service uses (florist, cleaners, salon, video store, locksmith, electronic repair, childcare, etc.); service Stations; restaurants (with alcohol sales); financial institutions; offices.

Land Use Regulations: Commercial and office land uses within the Lent Ranch Marketplace Special Planning Area shall be governed by the standards contained in this SPA. Where no standard is provided in this SPA, the Commercial (e.g., SC Zone) and Business Professional (e.g., BP Zone) Development Standards contained in the Elk Grove Zoning Code shall apply.

Office and Entertainment

Intent: The Office/Entertainment land use provides opportunities for offices, theaters, restaurants, entertainment-oriented retail uses such as bookstores, video stores and health clubs.

The Office and Entertainment structures are intended for placement near State Route 99 and sited with the intent of creating a quality first impression of the Project Site for motorists. The structures may be either single or multi-level. This land use will serve the surrounding community by providing employment and entertainment opportunities.

Uses Envisioned: Entertainment uses (e.g. theaters); offices, research and development facilities; conference and convention centers, skating rinks, bowling lanes, sporting venues; restaurants (with alcohol sales); financial institutions; schools; public facilities (e.g. post office).

Land Use Regulations: Commercial and office land uses within the Lent Ranch Marketplace Special Planning Area shall be governed by the standards contained in this SPA. Where no standard is provided in this SPA, the Commercial (e.g., SC Zone) and Business Professional (e.g., BP Zone) Development Standards contained in the Elk Grove Zoning Code shall apply.

City of Elk Grove Zoning Code

The City of Elk Grove Zoning Code (Elk Grove Municipal Code [EGMC] Title 23) carries out the policies of the Elk Grove General Plan by classifying and regulating the uses of land and structures within the City, consistent with the General Plan. EGMC Title 23 is adopted to protect and to promote the public health, safety, comfort, convenience, prosperity, and general welfare of residents and businesses in the City.

C8-2 Environmental Setting

C8-2.1 Zoning

The Project Site is zoned SPA (Special Planning Area; City of Elk Grove, 2014). The Project Site is in the Lent Ranch SPA zone (City of Elk Grove, 2025a). The Lent Ranch SPA was approved by City Council in 2001 and amended in 2014. The SPA outlines the permitted uses for each section of land in the planning area, including the Project Site (City of Elk Grove, 2014). The Project Site is composed of SPA districts B, C, and E. Districts B and C are zoned for Community Commercial development, which is intended to provide for the grouping of retail and service uses that are compatible in the types of commodities sold, the scope of services provided or the method of operation. The Community Commercial districts may contain large-format (power center) and mid-size stores, offices, and community commercial retail uses. Uses envisioned are outlined in **Section C8-1**, above. District E is zoned for Office and Entertainment. The Office/Entertainment land use provides opportunities for offices, theaters, restaurants, and entertainment-oriented retail uses such as bookstores, video stores, and health clubs. This land use is intended to serve the surrounding community by providing employment and entertainment opportunities. Uses envisioned are outlined in **Section C8-1**, above.

Areas surrounding the Project Site are zoned for residential districts to the west, industrial and commercial uses to the north, industrial and office uses to the east, and a separate study area outside of City limits but within the sphere of influence to the south (City of Elk Grove, 2023).

C8-2.2 Designated Land Use

The Project Site is located within the City of Elk Grove and is currently used for hay production. The Project Site is also within the Lent Ranch SPA, which designates land uses similarly to the General Plan. Existing land uses for the Project Site are designated by the Elk Grove General Plan as: Regional Commercial, Employment Center, and Transects 3, 3R, and 4, with a small area for Parks and Open Space (Figure 9 of **Appendix A**; City of Elk Grove, 2023). The designations are defined as follows:

- Regional Commercial: Regional Commercial uses are generally characterized by retail and service uses that serve a regional market area. These uses typically consist of a unified shopping center with major anchor stores and encompasses a larger total area than Community Commercial uses. Retail and service uses are intended to be the predominant use. Office and professional uses are also allowed. Limited residential uses may be allowed when integrated with nonresidential uses within an approved District Development Plan and consistent with zoning. Regional Commercial uses are generally located near intersections of two or more major roadways offering primary access.
- Employment Center: Employment Center uses are generally characterized by office uses and professional services or research and development facilities, which may include limited supporting and ancillary retail services. Limited light industrial spaces are allowed, generally as accessory uses. Employment Centers may be located near residential areas with good transportation access.
- Transect 3 (Neighborhood Center Low): Neighborhood Center Low includes similar uses and densities as T3- R, however, a mix of uses is permitted throughout, with no preference provided for residential uses. Buildings are typically not taller than 3 stories and are surface parked (on the side or rear of the lot), though additional height may be allowed through zoning provisions.
- Transect 3R (General Neighborhood Residential): General Neighborhood uses are generally characterized by small-lot single-family residential development (attached or detached), duplexes, townhomes, and small apartment buildings, but may also include small live-work spaces, home-offices or workspaces, and bed and breakfast inns. Limited amounts of local serving retail and small office structures, particularly at intersections are also permitted. Buildings are typically not taller than 3 stories and are surface parked (on the side or rear of the lot), though additional height may be allowed through zoning provisions.
- Transect 4 (Neighborhood Center Medium): Neighborhood Center Medium uses are generally characterized by a diverse mix of uses residential and commercial uses at higher intensities than T3. Residential building types generally include townhomes and urban apartment buildings, as well as live-work spaces. Retail, hotel, and office uses are permitted. Buildings are typically not taller than 5 stories (though additional height may be allowed through zoning provisions) and may have a mix of garage and or surface parking in the rear of the lot or the middle of the block, screened from view (City of Elk

Grove, 2023).

Surrounding land use designations are Tribal Trust Lands to the east, Medium Density Residential to the west, Low Density Residential to the north, and Study Area to the south (City of Elk Grove, 2023). The Lent Ranch SPA designates the Project Site as Community Commercial, Office, and Entertainment. A priority of the Lent Ranch SPA is to construct a commercial complex of sufficient size and land use mix that maximizes synergy on-site between commercial, office, retail, and high-density residential opportunities in the City.

C8-2.3 Agriculture

The Project Site is used for hay production, with no existing buildings. Soils on the Project Site, discussed in **Section C1**, are classified as Farmland of Statewide Importance by NRCS. This means that the land is considered important for the production of food, feed, fiber, forage, and oilseed crops. The DOC FMMP classifies the Project Site as Farmland of Local Importance, or Land of Importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee (DOC, 2025). The Project Site is not under an active Williamson Act Contract (DOC, 2023).

C8-3 Impact Assessment

C8-3.1 Assessment Criteria

Land use impacts would be significant if the alternative is incompatible with surrounding land uses or would conflict with the objectives of federal, tribal, regional, state, and local land use plans, policies, and controls for the project area. Significant land use impacts may also occur if the alternative converts Prime Farmland or Farmland of Statewide/Local/Unique Importance to other uses, as defined by the FPPA.

C8-3.2 Alternative A – Proposed Project

Land Use Compatibility

Alternative A would result in the Project Site being transferred from fee to federal trust, which would remove it from City land use jurisdiction. While land use regulations and zoning would not apply to the Project Site once taken into trust, the proposed uses would not conflict with the existing land use designation and zoning of the Project Site or adjacent properties. Alternative A would not impact the continued operation of adjacent businesses, as access would be maintained. Alternative A would be consistent with Lent Ranch SPA, which intends the Project Site to be mixed-use development with commercial, office, entertainment, and retail facilities. Therefore, Alternative A is consistent with the existing land use and zoning under City policies. The nearest airport is Franklin Field, more than five miles southwest of the Project Site. Alternative A would not impact any airstrips in the region. For these reasons, land use impacts from Alternative A would be less than significant and no mitigation measures are warranted.

Agriculture

The U.S. Census Bureau identifies the City of Elk Grove as within the Sacramento Metropolitan area; therefore, the Project Site is considered within an urban area and exempt from the FPPA.

Commercial uses under Alternative A are consistent with the adopted Lent Ranch SPA and thus significant impacts to agriculture are not anticipated. Therefore, impacts to agriculture would be less than significant and no mitigation measures are warranted.

C8-3.3 Alternative B – No Action

Under the No Action alternative, the Project Site would remain under City jurisdiction and no development would occur on the Project Site. Therefore, any potential for land use consistency or compatibility impacts would not occur under this alternative.

C8-4 Mitigation Measures

There are no mitigation measures for land use.

C9 PUBLIC SERVICES

C9-1 Regulatory Setting

C9-1.1 Federal

Safe Drinking Water Act and Clean Water Act

See **Section C2-1** above.

Public Law 280

Public Law 280 was enacted in 1953 to grant certain states criminal jurisdiction on reservations in addition to permitting civil litigation under tribal or federal court jurisdiction to be handled by state courts. The states mandated to assume criminal and civil jurisdiction over federal Indian lands are Alaska, California, Minnesota, Nebraska, Oregon, and Wisconsin, although certain tribal lands are exempt, including Metlakatla Indian Community on the Annette Island Reserve, Red Lake Reservation, and Warm Springs Reservation. However, Public Law 280 does not grant states the following regulatory powers over lands held in federal trust or tribes:

- Federally guaranteed fishing, tribal hunting, and trapping rights;
- Fundamental tribal governmental functions, such as domestic relations and tribal enrollment; and
- Authority to impose state taxes.

Due to the one-sided process that imposed state jurisdiction on tribes and the failure to recognize tribal sovereignty and tribal self-determination, Public Law 280 was opposed by tribes from its enactment. Subsequent acts of Congress, court decisions, and state actions to retrocede (or give back) jurisdiction back to the federal government have mitigated some of the effects of the 1953 law and strengthened tribes' jurisdiction over civil and criminal matters on their reservations.

C9-1.2 State and Local

California Integrated Waste Management Act (AB 939)

In 1989, the State of California enacted AB 939, the California Integrated Waste Management Act, which requires jurisdictions to conduct a solid waste disposal needs assessment that estimates the disposal capacity needed to accommodate projected solid waste generated within the jurisdiction and to identify a minimum of 15 years of permitted disposal capacity. All local jurisdictions are required to divert 50 percent of their total waste stream from landfill disposal.

California Senate Bill 1383 - Organic Waste

Requires cities, counties, and special districts to provide organic waste collection services to all residents and businesses and to conduct education and outreach on organics recycling. Requires 20 percent of edible food, Statewide, to be recovered for human consumption if it would otherwise be disposed of.

Sacramento County Water Agency

The SCWA provides retail water supply within Zone 40 to portions of unincorporated Sacramento County, the City of Rancho Cordova, and the City of Elk Grove, including the Project Site. SCWA Resolution No. 663 in May 1985 describes the boundaries of Zone 40. SCWA also provides wholesale water supply to a portion of the service area of Elk Grove Water District.

2005 Zone 40 Water Supply Master Plan

The 2005 Water Supply Master Plan (WSMP) was developed to provide a flexible program of water management alternatives that could be implemented as the availability and feasibility of water supply sources change (Sacramento County Water Agency, 2005). It presented recommendations to meet future water demands in Zone 40 through the year 2030 (identified as the 2030 Study Area) with a regional conjunctive use program balancing the use of groundwater, surface water, and recycled water supplies. The Freeport Regional Water Project alternative was selected as the preferred alternative.

2020 Zone 40 Water Supply Master Plan Amendment

The WSMP amendment presents an evaluation of the water demands, water supplies, water system facilities, and costs for two scenarios (Brown and Caldwell, 2020):

- Baseline. This scenario consists of Zone 40 with the land uses as currently approved plus three other previously planned projects known as West Jackson, Jackson Township, and NewBridge.
- Plan Area. This scenario consists of the Baseline scenario plus the proposed Grant Line Industrial Annexation Area.

City of Elk Grove General Plan

Policy ER – 4-1: Cooperate with the Cosumnes Community Services District (CCSD) Fire Department to reduce fire hazards, assist in fire suppression, and promote fire safety in Elk Grove.

Standard ER-4-1.a: Require, where appropriate, on-site fire suppression systems for all new commercial and industrial development to reduce the dependence on fire department equipment and personnel.

Policy SAF-1-2: Encourage the use of Crime Prevention Through Environmental Design (CPTED) principles in the design of projects and buildings, as well as parks and trails.

Policy SAF-1-4: Expand emergency response services as needed due to community growth.

Policy SAF-1-6: Require adequate emergency access for new development projects.

C9-2 Environmental Setting

C9-2.1 Water Supply

Water supply and treatment within Elk Grove, including the Project Site, is provided by SCWA. Existing water mains in the vicinity of the Project Site are located along Promenade Parkway. The SCWA serves approximately 200,000 customers and is one of 27 different water companies serving Sacramento County (Sacramento County, 2025). The Project Site is within Zone 40, which obtains its potable water supply from surface water and non-potable water from groundwater. According to the 2020 Urban Water Management Plan for the SCWA, Zone 40 consists of water rights from the Sacramento River and Central Valley Project contracts to meet 2045 anticipated demand (SCWA, 2021).

C9-2.2 Wastewater Service

The Project Site is within the SASD service area. The SASD is responsible for the collection, treatment, and disposal of wastewater throughout most of the urbanized areas of Sacramento County (Sacramento County, 2025). The Project Site is within the LA Elk Grove Trunk Shed for the SASD, with gravity mains of at least 10 inches running along Promenade Parkway (SASD, 2020a). This area contains the S142 Elk Grove Promenade pump station (SASD, 2020a).

C9-2.3 Solid Waste

Solid waste services in Elk Grove are provided by private hauling companies through a franchise agreement with the City of Elk Grove. Authorized haulers include Aces Waste Services, Advance Disposal, Atlas Disposal Industries, CA Waste Recovery Systems, Elk Grove Waste Management, FERMA Greenbox Inc., GreenWaste of Sacramento, North Cal Hauling, Patrick's Construction Clean-Up, Quality Construction Cleanup, Republic Services, Waste Management, and Waste Removal & Recycling (City of Elk Grove, 2025d). Solid waste is primarily disposed of at the Kiefer Landfill, which is owned and operated by the Sacramento County Department of Waste Management and Recycling.

C9-2.4 Electricity and Natural Gas

Natural gas services for the City of Elk Grove, including the Project Site, is supplied by PG&E. SMUD provides electrical services to the Project Site and region (SMUD, 2025).

C9-2.5 Law Enforcement

The Elk Grove Police Department provides police protection services to the Project Site. The Elk Grove Police Department has 153 sworn officers and 115 professional staff responding to approximately 85,000 calls per year (City of Elk Grove, 2025c). The nearest police station is the Elk Grove Police Department, approximately 2.9 miles north of the Project Site.

C9-2.6 Fire Protection and Emergency Medical Services

Fire protection and emergency medical services in the region are provided by the CCSD Fire Department. The Cosumnes Fire Station 77 is located 1.5 miles northwest of the Project Site and has 15 highly trained personnel. The nearest hospital with an emergency room is the Methodist Hospital of Sacramento, located approximately 6.2 miles northwest of the Project Site and contains 175 beds, with 29 designated for acute care (Dignity Health, 2023). Elk Grove Urgent Care is 3.3 miles northwest.

C9-2.7 Public Schools

The Project Site is within the Elk Grove Unified School District (EGUSD; EGUSD, 2025). The district is comprised of 68 schools, including elementary, middle, high, alternative, and adult schools. Miwok Village Elementary School is approximately 1.2 miles northwest of the Project Site and is part of the Elk Grove Unified School District.

C9-2.8 Parks and Recreation

The CCSD Fire Department is responsible for the operation and maintenance of public parks and recreational areas within the City. The Elk Grove Regional Park is the closest park to the Project Site and is located approximately 0.75 miles north. The Cosumnes River Preserve is located approximately eight miles southwest of the Project Site and is maintained through a partnership between the Nature Conservancy, the Bureau of Land Management, CDFW, Sacramento County Regional Parks, Department of Water Resources, Ducks Unlimited, and the California State Land Commission.

C9-3 Impact Assessment

C9-3.1 Assessment Criteria

An adverse effect would occur if project-related demands on public services would cause an exceedance of system capacities that resulted in significant effects to the physical environment.

C9-3.2 Alternative A – Proposed Project

Water Supply

Water supply and treatment would be supplied to the Project Site by SCWA through connections to water mains along Promenade Parkway. Water demand would be typical of uses associated with office space and businesses, as well as irrigation for landscaping. The City of Elk Grove's General Plan has identified the Project Site as an area of growth and has accounted for the water demand related to future developments, as specified within its Lent Ranch SPA.

Additionally, the 2020 Urban Water Management Plan for SCWA projects long-term water reliability through 2045 and Alternative A is within the SPA development assumptions for the Project Site (SCWA, 2021). The Tribe would pay for service accordingly and would coordinate connections and any extensions with the SCWA. There would be a less than significant impact and no mitigation is required.

Wastewater

Wastewater disposal and treatment would be provided to the Project Site by SASD through connections to an existing 15-inch diameter trunk sewer main along Promenade Parkway. An existing pump station (S142) is located approximately 0.5 miles west of the Project Site at the intersection of Lotz Parkway and Kyler Road. Wastewater generation would be typical of uses associated with office space and businesses. The City of Elk Grove has identified and planned for sewer conveyance and treatment capacity to be available to meet demand created by new development within the Project Site, as specified within the Lent Ranch SPA. The 2020 SASD System Capacity Plan Update plans for sewer conveyance and treatment capacity to be available for projects within the current and future SASD service area, including Alternative A, which is within SPA development assumptions. The Tribe would pay the sewer impact fees for service accordingly and would coordinate connections and any extensions with the SASD (SASD, 2020b). There would be a less than significant impact and no mitigation is required.

Solid Waste Service

Solid waste generated from the construction of Alternative A would be temporary and therefore would not impact long-term capacity of local landfills or private hauling companies. Operation of Alternative A would slightly increase the generation of solid waste compared to the existing undeveloped site. Solid waste generated under Alternative A would be transferred to the Keifer Landfill. The Keifer Landfill is permitted to receive more than 10,000 tons of waste per day (Sacramento County, 2024). The reasonably foreseeable uses on the Project Site include various types of commercial development, which typically dispose of between 1 and 10 pounds of solid waste per employee per day (CalRecycle, 2025). BMPs in **Appendix B** include the use of single-stream recycling and green waste diversion to the extent that it is available. Operation of Alternative A would increase the generation of solid waste compared to the existing undeveloped site but is within the development assumptions of the SPA and thus is not expected to reduce the expected life of landfill facilities. Therefore, construction and operation of Alternative A would not result in a significant effect to solid waste services and no mitigation measures are warranted.

Electricity and Natural Gas

Electricity for Alternative A would be provided by SMUD. Natural gas for Alternative A would be provided by PG&E. The Tribe would pay for these services accordingly. Existing electrical infrastructure occurs adjacent to the Project Site and would be extended if needed through coordination with SMUD. Natural gas extensions, if needed, would be coordinated with PG&E. There would be a less than significant impact and no mitigation measures are warranted.

Law Enforcement, Fire Protection, and Emergency Medical Services

Under Alternative A, the Elk Grove Police Department would provide law enforcement services to the Project Site once in trust. The CCSD Fire Department would provide fire protection and emergency services to the Project Site once in trust. Construction of Alternative A would require construction vehicles and equipment, such as welders, torches, and grinders, that may accidentally spark and ignite vegetation or building materials. This risk will be minimal due to the undeveloped nature of the Project Site and would be similar to that found at other construction sites. To further reduce the probability of fire risk during construction, BMPs in **Appendix B** include keeping the work area clear of fire fuels, trash, and debris.

Alternative A would result in a minimal increase in demand due to the limited size and scope as well as the planned and anticipated buildout of the site. Calls for service would not be disproportionate to other similar developments in the area. As discussed in **Section C6**, mitigation included in Section C6-4 would ensure the Tribe would make good faith efforts to amend the existing MOU to address the potential increase in calls. There would be a less than significant impact with mitigation.

Schools and Parks

Impacts to Elk Grove Unified School District as a result of Alternative A would be negligible due to the limited size and scope of the proposed development. Alternative A is within the development assumptions of the adopted Lent Ranch SPA and primarily commercial in nature, and thus is not anticipated to create unforeseen demand on local schools and parks. Therefore, less than significant impacts to schools and parks would occur and no mitigation measures are warranted.

C9-3.3 Alternative B – No Action

The No Action alternative would not increase demands on public services and no new utility extensions would be required.

C9-4 Mitigation Measures

Mitigation Measures described in **Section C6-4** Public Safety Coordination would ensure adequate provision of law enforcement, fire protection, and emergency medical services to the Project Site.

C10 NOISE

C10-1 Acoustical Background and Terminology

C10-1.1 Fundamentals of Sound

Sound is defined as any pressure variation in air that the human ear can detect, and is technically described in terms of loudness (amplitude) and frequency (pitch). The standard unit of sound amplitude measurement is the decibel (dB). The dB scale uses the hearing threshold (20 micropascals of pressure), as a point of reference, defined as 0 dB.

Other sound pressures are then compared to the reference pressure, and the logarithm is taken to keep the numbers in a practical range. The dB scale allows a million-fold increase in pressure to be expressed as 120 dB.

The perceived loudness of sounds is dependent upon many factors, including sound pressure level and frequency content. However, within the usual range of environmental noise levels, perception of loudness is relatively predictable, and can be approximated by weighing the frequency response of a sound level meter by means of the standardized A-weighting network. There is a strong correlation between A-weighted sound levels (expressed as dBA) and community response to noise. For this reason, the dBA sound level has become the standard tool of environmental noise assessment. Noise levels reported in this section are in terms of A-weighted levels in dB.

Community noise is commonly described in terms of the “ambient” noise level, which is defined as the all-encompassing noise level associated with a given noise environment. A common statistical tool to measure the ambient noise level is the average, or equivalent sound level (L_{eq}) over a given time period (usually one hour). The L_{eq} is the foundation of the Day-Night Average Level (L_{dn}) noise descriptor, and shows very good correlation with community response to noise. The L_{dn} is based upon the average noise level over a 24-hour day, with a +10 dB weighting applied to noise occurring during nighttime (10:00 p.m. to 7:00 a.m.) hours. The nighttime penalty is based upon the assumption that people react to nighttime noise exposures as though they were louder than daytime exposures. Because L_{dn} represents a 24-hour average, it tends to disguise short-term variations in the noise environment. L_{dn} -based noise standards are commonly used to assess noise effects associated with traffic, railroad, and aircraft noise sources.

Effects of Noise on People

The effects of noise on people can be placed in three categories:

- Subjective effects of annoyance, nuisance, and dissatisfaction
- Interference with activities such as speech, sleep, and learning
- Physiological effects such as hearing loss or sudden startling

Environmental noise typically produces effects in the first two categories. Workers in industrial plants can experience noise in the last category. There is no completely satisfactory way to measure the subjective effects of noise or the corresponding reactions of annoyance and dissatisfaction. A wide variation in individual thresholds of annoyance exists and different tolerances to noise tend to develop based on an individual’s past experiences with noise. Thus, an important way of predicting a human reaction to a new noise environment is the way it compares to the existing environment to which one has adapted: the ambient noise level. In general, the more a new noise exceeds the previously existing ambient noise level, the less acceptable the new noise will be judged by those hearing it. With regard to increases in A-weighted noise level, the following relationships occur:

- Except in carefully controlled laboratory experiments, a change of 1-dBA cannot be perceived;
- Outside of the laboratory, a 3-dBA change is considered a just-perceivable difference;
- A change in level of at least 5-dBA is required before any noticeable change in human response would be expected; and

- A 10-dBA change is subjectively heard as approximately a doubling in loudness and can cause an adverse response.

Generally, most noise is generated by transportation systems, principally motor vehicle noise, but also including aircraft noise and rail noise. The level of traffic noise depends on three things: 1) the volume of the traffic, 2) the speed of the traffic, and 3) the number of trucks in the flow of the traffic. Because noise is measured on a logarithmic scale, 70 dBA plus 70 dBA does not equal 140 dBA. Instead, two sources of equal noise added together have been found to result in an increase of 3 dBA. That is, if a certain volume of traffic results in a noise level of 70 dBA the addition of the same volume of traffic, or doubling, would result in a noise level of 73 dBA. As stated above, 3 dBA is just audible; therefore, if a project doubles the traffic volume there would be an audible increase in the ambient noise level.

Noise attenuates (lessens) at a rate of 6 to 9 dBA per doubling of distance from the source, depending on environmental conditions (i.e., atmospheric conditions and noise barriers, vegetative or manufactured, etc.). Widely distributed noises, such as a large industrial facility or a street with moving vehicles would typically attenuate at a lower rate, approximately 4 to 6 dBA per doubling of distance.

C10-2 Regulatory Setting

C10-2.1 Federal

Federal Noise Abatement Criteria

Operational noise standards used in this study are FHWA Noise Abatement Criteria (NAC) for the assessment of noise consequences related to surface traffic and other project-related noise sources. These standards are discussed below. The FHWA establishes NAC for various land uses that have been categorized based upon activity. Land uses are categorized on the basis of their sensitivity to noise as indicated in **Table C10-1**. The FHWA NAC is based on peak traffic hour noise levels. Sensitive receptors with the potential to be impacted by the project alternatives primarily consist of residential land uses; thus, the Category B noise standard (67 dBA L_{eq}) would apply to those uses.

Table C10-1: Federal Noise Abatement Criteria Hourly A-Weighted Sound Level Decibels

Activity Category	Activity Criteria L_{eq} (h), dBA	Evaluation Location	Activity Category Description
A	57	Exterior	Lands on which serenity and quiet are of extraordinary significance and serve an important public need and where the preservation of those qualities is essential if the area is to continue to serve its intended purpose.
B	67	Exterior	Residential.
C	67	Exterior	Active sport areas, amphitheaters, auditoriums, campgrounds, cemeteries, daycare centers, hospitals, libraries, medical facilities, parks, picnic areas, places of worship, playgrounds, public meeting rooms, public or nonprofit institutional structures, radio studios, recording studios, recreation areas, Section 4(f) sites, schools, television studios, trails, and trail crossings.

Activity Category	Activity Criteria Leq (h), dBA	Evaluation Location	Activity Category Description
D	52	Interior	Auditoriums, daycare centers, hospitals, libraries, medical facilities, places of worship, public meeting rooms, public or non-profit institutional structures, radio studios, recording studios, schools, and television studios.
E	72	Exterior	Hotels, motels, offices, restaurants/bars, and other developed lands, properties or activities not included in A-D or F.
F	--	--	Agriculture, airports, bus yards, emergency services, industrial, logging, maintenance facilities, shipyards, utilities (water resources, water treatment, electricity), and warehousing.
G	--	--	Undeveloped lands that are not permitted.

Source: Title 23 CFR Part 772, Table 1 to Part 772 – Noise Abatement Criteria

Federal Transit Administration Transit Noise and Vibration Impact Assessment Manual (2018)

The FTA has adopted vibration standards that are used to evaluate potential building damage impacts related to construction activities. The vibration damage criteria adopted by the FTA are shown in **Table C10-2**.

Table C10-2: Construction Vibration Damage Criteria

Building Category	Peak Particle Velocity (inches/second)
Reinforced concrete, steel, or timber (no plaster)	0.5
Engineered concrete and masonry (no plaster)	0.3
Non-engineered timber and masonry buildings	0.2
Buildings extremely susceptible to vibration damage	0.12

Source: FTA, 2018

The FTA has also adopted standards associated with human annoyance for groundborne vibration impacts for three land use categories: (1) High Sensitivity; (2) Residential; and (3) Institutional. **Table C10-3** describes these three categories as well the associated vibration thresholds associated with human annoyance for these categories.

Table C10-3: Groundborne Vibration Impact Criteria for General Assessment

Land Use Category	Frequent Events ¹	Occasional Events ²	Infrequent Events ³
Category 1: Buildings where vibration would interfere with interior operations	65 VdB	65 VdB	65 VdB
Category 2: Residences and buildings where people normally sleep	72 VdB	75 VdB	80 VdB
Category 3: Institutional land uses with primarily daytime use	75 VdB	78 VdB	83 VdB

Source: FTA, 2018

¹ More than 70 events per day

² 30-70 events per day

³ Fewer than 30 events per day

VdB = Vibration decibels

In addition, the FTA manual outlines guidelines for evaluating construction noise impacts across various land use categories, which the general assessment is presented in **Table C10-6**.

Table C10-4: General Assessment Construction Noise Criteria

Land Use	Day L_{eq}	Night L_{eq}
Residential	90 dBA	80 dBA
Commercial	100 dBA	100 dBA
Industrial	100 dBA	100 dBA

Source: FTA, 2018

C10-2.2 Local

Elk Grove County General Plan, Amended 2023

The Elk Grove General Plan provides a comprehensive framework for guiding the physical development of the City in alignment with the community's vision and values. It fulfills the State of California's legal requirement for a long-range general plan, incorporating the eight mandated elements—land use, circulation, housing, conservation, open space, noise, safety, and environmental justice—within a locally tailored format.

Policy N-1-1: New development of the uses listed in Table 8-3 (reproduced as **Table C10-5**) shall conform with the noise levels contained in the table. All indoor and outdoor areas shall be located, constructed, and/or shielded from noise sources in order to achieve compliance with the City's noise standards.

Policy N-1-2: Where noise mitigation measures are required to achieve the standards of Tables 8-3 (reproduced as **Table C10-5**) and 8-4 (reproduced as **Table 10C-6**), the emphasis of such measures shall be placed upon site planning and project design. The use of noise barriers shall be considered a means of achieving the noise standards only after all other practical design related noise mitigation measures, including the use of distance from noise sources, have been integrated into the project.

Policy N-1-3: Use the noise contour mapping identified in Figure 8-7 to inform land use decisions.

Policy N-1-4: Protect noise-sensitive land uses, identified in Table 8-3 (reproduced as **Table C10-5**), from noise impacts.

Table C10-5: Maximum Allowable Noise Exposure; Transportation Noise Sources

Land Use	Outdoor Activity Areas (dB L_{dn}) ^{1,2}	Interior Space (dB L_{dn})	Interior Space (dB L_{dn}) ³
Residential	60 ^{4,7}	45	—
Residential subject to noise from railroad tracks, aircraft overflights, or similar noise sources which produce clearly identifiable, discrete noise events (the passing of a single train, as opposed to relatively steady noise sources as roadways)	60 ^{4,7}	40 ⁶	—

Land Use	Outdoor Activity Areas (dB L _{dn}) ^{1,2}	Interior Space (dB L _{dn})	Interior Space (dB L _{dn}) ³
Transient Lodging	60 ^{4,7}	45	—
Hospitals, Nursing Homes	60 ^{4,7}	45	—
Theaters, Auditoriums, Music Halls	—	—	35
Churches, Meeting Halls	60 ^{4,7}	—	40
Office Buildings	—	—	45
Schools, Libraries, Museums	—	—	45

Note: Applies to noise-sensitive land uses only

1. Where the location of outdoor activity areas is unknown, the exterior noise level standards shall be applied to the property line of the receiving land use. Where it is not practical to mitigate exterior noise levels at patios or balconies of apartment complexes, a common area such as a pool or recreation area may be designated as the outdoor activity area.
2. Transportation projects subject to Caltrans review or approval shall comply with the Federal Highway Administration noise standards for evaluation and abatement of noise impacts.
3. As determined for a typical worst-case hour during periods of use.
4. Where it is not possible to reduce noise in outdoor activity areas to 60dB L_{dn} or less using a practical application of the best-available noise reduction measures, an exterior noise level of up to 65 dB L_{dn} may be allowed provided that available exterior noise level reduction measures have been implemented and interior noise levels are in compliance with this table.
5. In the case of hotel/motel facilities or other transient lodging, outdoor activity areas such as pool areas may not be included in the project design. In these cases, only the interior noise level criterion will apply.
6. The intent of this noise standard is to provide increased protection against sleep disturbance for residences located near railroad tracks.
7. In cases where the existing ambient noise level exceeds 60 dBA, the maximum allowable project-related permanent increase in ambient noise levels shall be 3 dBA L_{dn}.

Policy N-1-5: Where noise-sensitive land uses are proposed in areas exposed to existing or projected exterior noise levels exceeding the levels specified in Table 8-3 (reproduced as **Table C10-5**) or the performance standards of Table 8-4 (reproduced as **Table 10C-6**), an acoustical analysis shall be required as part of the environmental review process so that noise mitigation may be included in the project design.

Table C10-6: Noise Level Performance Standards for New Projects Affected by or Including Non-transportation Noise Sources*

Performance Standards for Stationary Sources	Noise Level Descriptor	Daytime (7 a.m. to 10 p.m.)	Nighttime (10 p.m. to 7 a.m.)
Performance Standards for Typical Stationary Noise Sources ¹	Hourly L _{eq} , dB	55 ^{3,4}	55 ^{3,4}
Performance Standards for Stationary Noise Sources Which Are Tonal, Impulsive, Repetitive, or Consist Primarily of Speech or Music ²	Hourly L _{eq} , dB	55 ^{3,4}	55 ^{3,4}

* Applies to noise-sensitive land uses only

1. These standards will apply generally to noise sources that are not tonal, impulsive, or repetitive in nature. Typical noise sources in this category would include HVAC systems, cooling towers, fans, and blowers.
2. These standards apply to noises which are tonal in nature, impulsive, repetitive, or which consist primarily of speech or music (e.g., humming sounds, outdoor speaker systems). Typical noise sources in this category include: pile drivers, drive-through speaker boxes, punch presses, steam valves, and transformer stations. HVAC/pool equipment are exempt from these standards.
3. These noise levels do not apply to residential units established in conjunction with industrial or commercial uses (e.g., caretaker dwelling). HVAC/pool equipment are exempt from these standards
4. The City may impose noise level standards which are more or less restrictive based upon determination of existing low or high ambient noise levels.

Policy N-1-6: Where proposed nonresidential land uses are likely to produce noise levels exceeding the performance standards of Table 8-4 (reproduced as **Table 10C-6**) at existing or planned noise sensitive uses, an acoustical analysis shall be required as part of the environmental review process so that noise mitigation may be included in the project design.

Policy N-1-7: The standards outlined in Table 8-4 (reproduced as **Table 10C-6**) shall not apply to transportation and infrastructure-related construction activities as long as construction occurs between the hours of 7 a.m. and 7 p.m., Monday through Friday, and 8 a.m. and 5 p.m. on weekends and federally recognized holidays. Work may occur beyond these time frames for construction safety or because of existing congestion that makes completing the work during these time frames infeasible.

Policy N-1-9: For projects involving the use of major vibration generating equipment (e.g., pile drivers, vibratory rollers) that could generate groundborne vibration levels in excess of 0.2 in/sec ppv, the City may require a project-specific vibration impact assessment to analyze potential groundborne vibrational impacts and may require measures to reduce ground vibration levels.

Policy N-2-1: Noise created by new proposed non-transportation noise sources shall be mitigated so as not to exceed the noise level standards of Table 8-4 (reproduced as **Table 10C-6**) as measured immediately within the property line of lands designated for noise-sensitive uses.

City of Elk Grove Municipal Code on Noise Control – Chapter 6.32

Chapter 6.32 of the EGMC outlines the City’s regulations for community noise control.

Exterior Noise Standards (Section 6.32.080A-C)

Section 6.32.080 establishes maximum allowable noise levels at sensitive receptors. These levels are based on the time of day and type of noise source as specified in Table 6.32-1 of the Municipal Code (reproduced as Table C10-7)

Table C10-7: Exterior Noise Standards for Sensitive Receptors

Noise Source Type	7:00 a.m. to 10:00 p.m.	10:00 p.m. to 7:00 a.m.
Stationary noise sources (general)	55 dBA	45 dBA
Stationary tonal, impulsive, repetitive, or speech/music-based noise sources	50 dBA	40 dBA

Additional provisions under Section 6.32.080 include:

- **Boundary Rule:** When measuring noise levels near the boundary between two different land use zones (e.g., commercial next to residential), it may not be clear which zone’s noise standard should apply. To protect the more sensitive land use, the City requires applying the more restrictive (i.e., lower) noise limit.
- **Ambient Noise Adjustments:** The City recognizes that in some areas, ambient (background) noise levels may already exceed the baseline thresholds in Table 6.32-1 (reproduced as **Table C10-7**). In these cases, a small incremental increase is allowed above the measured ambient level, depending on how high that ambient level is:

- If ambient noise is less than 60 dB but above the Table 6.32-1 threshold, then 5 dB increase is allowed.
- If ambient level is 60–65 dB, then 3 dB increase is allowed.
- If ambient is greater than 65 dB, then 1.5 dB increase is allowed.

Construction Noise Exemptions (Section 6.32.100.E) and Restrictions (6.32.140.A)

Section 6.32.080 establishes maximum allowable noise levels at sensitive receptors while Section 6.32.100 specifies exemptions from noise standards, including those applicable to construction activities. Under Subsection E, noise generated by construction, repair, remodeling, demolition, paving, or grading is exempt from the City’s noise restrictions if conducted during the following hours:

- 7:00 a.m. to 7:00 p.m. when the activity is in close proximity to residential uses, or
- 6:00 a.m. to 8:00 p.m. when the activity is not in close proximity to residential uses.

Section 6.32.140.A reinforces that any construction noise occurring outside the permitted hours (based on proximity to residences) constitutes a violation unless certain conditions apply. However, if unforeseen or unavoidable conditions arise during construction, and stopping work would jeopardize inspection acceptance or cause undue financial hardship, contractors or property owners may continue work beyond the normal hours. This exception only applies to completing a specific work phase already in progress, not initiating new activities.

C10-3 Environmental Setting

C10-3.1 Ambient Noise Environment

The dominant noise source in the vicinity of the Project Site is traffic along Highway 99. Other roadways, such as Kammerer Road, also contribute traffic related noise. Additional noise sources in the area include existing commercial uses. The estimated ambient noise level is assumed to be primarily due to traffic noise on Highway 99 and is estimated to be approximately 65 dBA L_{eq} in the vicinity of the Project Site (City of Elk Grove, 2023).

C10-3.2 Sensitive Receptors

Some land uses are considered more sensitive to noise than others due to the amount of noise exposure (in terms of both exposure duration and insulation from noise) and the types of activities typically involved. Residences, motels and hotels, schools, libraries, churches, hospitals, nursing homes, auditoriums, and parks and other outdoor recreation areas generally are more sensitive to noise than commercial or industrial land uses. A sensitive receptor is defined as any living entity or aggregate of entities whose comfort, health, or well-being could be impaired or endangered by the existence of the criteria pollutant, whether it is emissions or noise, in the atmosphere.

Sensitive receptors in the Project Site vicinity include the Sterling Meadows residential neighborhood located directly west of the Project Site (approximately 50 feet), a medical center located on the northern boundary, and Harvest Church, located approximately 500 feet east of the site, across Highway 99.

C10-4 Impact Assessment

C10-4.1 Assessment Criteria

The assessment of potential noise and vibration impacts from development is based on federal standards/guidelines from the FHWA and FTA, as well as applicable local policies. Adverse noise or vibration effects at existing sensitive receptor locations would be considered significant if any of the following conditions occur as a result of Alternative A:

Construction Noise and Vibration

- Construction noise levels exceed the FTA noise thresholds guidelines for residential receptors: 90 dBA L_{eq} during daytime or 80 dBA L_{eq} at night.
- Construction activities occur outside of the allowable hours (7:00 a.m. to 7:00 p.m.) within close proximity to residential uses, as defined by City of Elk Grove Municipal Code Section 6.32.100(E).
- Groundborne vibration levels exceed 85 VdB for annoyance or 0.2 in/sec ppv for potential structural damage at nearby sensitive uses.

Operation Noise

- Project-generated traffic increases exterior noise at sensitive receptors beyond FHWA NAC, 67 dBA L_{eq} for residential uses where such thresholds are not currently exceeded.
- Project-generated traffic causes a permanent increase in ambient noise levels of 3 dBA or more in areas where existing noise exceeds 60 dBA L_{dn} , in accordance with Elk Grove General Plan Policy N-1-4.
- On-site operational noise sources (e.g., HVAC, delivery vehicles, generators) exceed the performance standards of Table 8-4 (reproduced as Table C10-3) of the Elk Grove General Plan at nearby sensitive uses:
 - 55 dB L_{eq} (hourly) during daytime (7 a.m.–10 p.m.)
 - 55 dB L_{eq} (hourly) during nighttime (10 p.m.–7 a.m.)
- On-site operation noise exceeds City of Elk Grove Municipal Code Section 6.32.080 establishes maximum exterior noise levels at sensitive receptors based on source type and time of day (see Table C10-7):
 - Stationary general sources: 55 dBA (day) / 45 dBA (night)
 - Tonal, impulsive, repetitive, or speech/music sources: 50 dBA (day) / 40 dBA (night)
 - Where ambient noise exceeds these thresholds, the following incremental increases are allowed:
 - +5 dB if ambient is less than 60 dBA
 - +3 dB if ambient is 60–65 dBA
 - +1.5 dB if ambient is greater 65 dBA

C10-4.2 Alternative A – Proposed Project

Construction Noise

The City of Elk Grove General Plan sets performance standards for stationary noise sources of 55 dBA L_{eq} during both daytime and nighttime hours at sensitive receptors (**Table C10-6**). However, the existing ambient noise environment near the Project Site, dominated by traffic from Highway 99 and surrounding commercial activity, already exceeds these thresholds. Because construction activities are temporary and do not create a permanent change in ambient noise levels, the FTA construction noise guidelines (**Table C10-4**), which identify 90 dBA L_{eq} as the significance threshold for residential receptors, are applied to determine significance.

During construction of Alternative A, noise from construction activities would add to the noise environment in the immediate vicinity of the Project Site. Typical construction activities could generate maximum noise levels up to 85 dBA at a distance of 50 feet, as indicated in **Table C10-8**.

Table C10-8: Typical Construction Noise Levels

Construction Equipment	Maximum Noise Level at 50 ft (dBA)	Construction Equipment	Maximum Noise Level at 50 ft (dBA)
Crane (mobile or stationary)	85	Tractor	84
Dozer	85	Generator (less than 25 kilo-volt-amperes)	70
Excavator	85	Backhoe	80
Grader	85	Compressor (air)	80
Paver	85	Front end loader	80
Scraper	85	Pickup truck	55
Jackhammer	85	Flat Bed truck	84
Concrete pump truck	82	Dump truck	84

Source: FTA, 2018

These noise levels may vary depending on the particular type, number, and duration of use of various pieces of construction equipment. Noise attenuates (lessens) at 6 – 9 dBA per doubling of distance from the source, depending on environmental conditions (e.g., atmospheric conditions, noise barriers) and whether the noise source is stationary or moving. An attenuation factor of 6 dBA per doubling of distance is appropriate for the Project Site given the flat topography and lack vegetation/structures between the Project Site and nearest sensitive receptors. Assuming up to three of the loudest pieces of equipment operating at one time, the highest noise level would be 89.8 dBA. Based on the estimates of construction noise described above, the maximum construction noise level from the Project Site could be 89.8 dBA at the nearest sensitive receptors, which is 50 feet west. This noise level would be below the federal noise construction threshold of 90 dBA for residences. Furthermore, with the incorporation of the construction noise BMPs included in **Appendix B**, construction noise and duration would be reduced. This includes limiting construction activities to between 7:00 a.m. and 7:00 p.m.

These hours are consistent with City General Plan Policy N-1-7 and City of Elk Grove Municipal Code Section 6.32.100.E and 6.32.140.A , which exempt certain construction projects from noise restrictions when conducted within the specified timeframes. Therefore, because construction noise would not exceed the 90 dBA FTA threshold, and given the short-term, temporary nature of construction activities, along with the implementation of BMPs to limit noise levels and restrict working hours, construction-related noise effects would be less than significant, and no mitigation measures are warranted. During construction, workers, vendors, and material haul trips have the potential to raise ambient noise levels on local roadways, depending on the number of trips and the types of vehicles used. For the ambient noise environment, peak commute times would be the noisiest time periods because the highest traffic volumes would occur at these times. Increasing vehicle trips during these times would have the potential to create the greatest noise impact and cause adverse effects to sensitive receptors along roadways. Worker trips to the Project Site would partially coincide with local commute trips, but the majority of truck trips would occur during the day and outside the traffic peak hours. Worker trips to the Project Site would partially coincide with local commute periods; however, the majority of construction-related truck trips would occur during the daytime and outside of peak traffic hours. Most construction traffic would utilize Highway 99, which already experiences high volumes of existing regional traffic. As a result, the additional truck traffic generated during construction would represent a very small fraction of total roadway use and would not result in a noticeable increase in ambient noise levels along the highway corridor. Minor increases in traffic may also occur along local roadways such as Kammerer Road and Promenade Parkway, but these would be temporary and limited in scale given the phased nature of development under Alternative A. For these reasons, construction traffic would not result in a significant increase in ambient noise levels, and no mitigation measures are warranted.

Construction Vibration

Table C10-9 presents the vibration levels generated by typical construction equipment at a distance of 25 feet. With the exception of vibratory rollers, vibration levels at this distance are below the threshold for structural damage (0.2 in/sec peak particle velocity). However, all equipment types listed in **Table C10-9** would generate vibration levels that exceed the threshold for human annoyance at 25 feet.

C10-9: Vibration Levels for Construction Equipment

Equipment	Maximum Vibration Level at 25 feet [VdB (rms)]	Maximum Vibration Level at 25 feet in/sec ppv
Vibratory Roller	94	0.21
Large Bulldozers	87	0.089
Loaded Trucks	86	0.076
Jackhammer	79	0.035

Source: FTA, 2018

The threshold of perception for humans is approximately 65 VdB while a vibration level of 85 VdB at a residence can result in strong annoyance (FTA, 2018). The nearest residential receptor is a residence approximately 50 feet west of the Project Site.

While this distance is sufficient to avoid vibration levels that could cause structural damage to buildings, it may approach or exceed the threshold for human annoyance and exceed the FTA guideline thresholds in **Table C10-3** depending on the duration and frequency of the event, particularly if high-vibration equipment was used near the Project Site border nearest to the sensitive receptors. To minimize the potential for vibration-related disturbance to nearby sensitive receptors, mitigation in **Section C10-4** would be implemented to reduce vibration impacts to nearby sensitive receptors. This mitigation includes locating high-vibration equipment as far from sensitive receptors as possible and appointing a disturbance coordinator to address vibration-related complaints. With implementation of this mitigation measure, vibration impacts during construction would be reduced to less than significant

Operation Noise

Alternative A is not anticipated to generate significant new sources of noise. Typical operational noise from the mixed-use development would include sounds associated with vehicle circulation, parking activities (e.g., car doors, engine starts), human voices, loading/unloading, landscape maintenance, and heating, ventilation, and air conditioning (HVAC) systems. These are common noise sources for commercial and residential areas and are not expected to substantially elevate ambient noise levels.

Operational noise from Alternative A would include typical sounds associated with commercial and mixed-use development, such as landscape maintenance, HVAC systems, conversations, and parking lot activity (e.g., vehicle engines, car doors). These are consistent with existing urban noise sources and are not expected to substantially increase ambient noise levels. Under both the Elk Grove General Plan and the City's Municipal Code, there are stationary operational noise limits at the exterior of sensitive receptors. The General Plan (**Table C10-3**) specifies a standard of 55 dBA L_{eq} during both daytime and nighttime hours. The Municipal Code (Section 6.32.080, **Table C10-7**) establishes similar standards of 55 dBA (day) and 45 dBA (night) for general stationary sources, and lower limits of 50 dBA (day) and 40 dBA (night) for tonal, impulsive, or repetitive sources. However, the Municipal Code allows incremental increases based on the existing ambient noise. In the Project Site area, ambient noise is estimated at approximately 65 dBA due to traffic on Highway 99. Therefore, the applicable performance threshold for new stationary sources under the Municipal Code is 66.5 dBA L_{eq} . Operational noise under Alternative A is not expected to noticeably increase ambient noise levels due to the already high existing noise environment.

Traffic is often a major contributor to community noise, and most project-generated traffic would access the site via Highway 99, a high-volume regional corridor that currently dominates the local noise environment. Because traffic volumes would increase incrementally and would not double existing volumes, Alternative A would not result in a perceptible increase (i.e., 3 dBA or more) in the ambient noise environment. The existing ambient noise level in the area is estimated at approximately 65 dBA, and Alternative A would not raise this level above the FHWA threshold of 67 dBA for residential receptors.

Given the context of existing high traffic volumes, the distributed nature of new trips, and the absence of elevated on-site noise sources, Alternative A would result in less-than-significant operational noise impacts.

Operation Vibration

Alternative A does not include land uses or equipment that would generate substantial operational vibration. The types of commercial and mixed-use development anticipated—such as retail, office, hotel, and residential uses—do not typically involve machinery or activities that produce perceptible groundborne vibration. Therefore, Alternative A is not expected to generate operational vibration levels that would be perceivable at nearby sensitive receptors, such as the Sterling Meadows residential neighborhood. Therefore, this impact would be less than significant.

C10-4.3 Alternative B – No Action Alternative

Under the No Action alternative, the Project Site would remain as it is with no additional development. The Project Site would not be a source of new construction or operational noise. No noise impacts would occur under Alternative B.

C10-5 Mitigation Measures

Construction Vibration Measures

To reduce vibration impacts during construction, the following measures shall be implemented

- High-vibration stationary construction equipment shall be located as far from adjacent sensitive receptors as feasible, and equipment with reduced vibration output shall be used whenever possible, especially during work occurring within 50 feet of such receptors.
- The Tribe shall monitor construction noise and vibration and will designate a disturbance coordinator (such as an employee of the general contractor or the project manager for the Tribe), post the coordinator's contact telephone number conspicuously around the Project Site, and provide the number to nearby sensitive receptors. The disturbance coordinator shall receive all public complaints, be responsible for determining the cause of the complaints, and implement any feasible measures to alleviate the problem.

C11 HAZARDOUS MATERIALS

C11-1 Regulatory Setting

C11-1.1 Federal

United States Environmental Protection Agency

The USEPA manages hazardous waste to help protect human health and the environment.

United States Department of Transportation

The USDOT governs the transportation of hazardous materials in interstate, intrastate, and foreign commerce.

Resource Conservation and Recovery Act

RCRA regulates the land disposal of hazardous materials from cradle-to-grave. This means establishing a regulatory framework for the generation, transport, treatment, storage, and disposal of hazardous waste. Specifically, Subtitle D of RCRA pertains to non-hazardous solid waste and Subtitle C focuses on hazardous solid waste. A solid waste can consist of solids, liquids, and gases, but these must be discarded in order to be considered waste. Additionally, the USEPA has developed regulations to set minimum national technical standards for how disposal facilities should be designed and operated. States issue permits to ensure compliance with USEPA and state regulations. The regulated community is comprised of a diverse group that must comprehend and adhere to RCRA regulations. These groups can consist of hazardous waste generators, government agencies, small businesses, and gas stations with underground petroleum tanks. As of November 27, 2023, the RCRA regulations have been updated by the USEPA to include the identification of Non-Hazardous Secondary Materials that Are Solid Waste and the 2018 Additions to List of Categorical Non-Waste Fuels.

Food, Drug, and Cosmetic Act

Under the federal Food, Drug, and Cosmetic Act, the USEPA sets maximum residue limits, or tolerances, for pesticides residues on food. When the USEPA sets a tolerance level for a food, this is the level deemed safe. In defining safe, this means that, “reasonable certainty that no harm will result from aggregate exposure to the pesticide residue.” When determining a safety finding for a tolerance level, the USEPA considers the toxicity of the pesticide and its break-down products, aggregate exposure to the pesticide in foods and from other sources of exposure if applicable, and any special risks specific to infants and children. If a tolerance is not set for a pesticide residue, a food containing that pesticide residue will be subject to government seizure if deemed appropriate. However, once a tolerance has been established for a pesticide residue, then residue levels below the tolerance will not trigger enforcement actions. If the residue level is detected above that tolerance, then the commodity will be subject to seizure. Some pesticides do not have a set tolerance level as the USEPA may grant exemptions in the cases where the pesticide residue does not pose, under foreseeable situations, a significant dietary risk.

Insecticide, Fungicide, and Rodenticide Act

The federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) addresses the sale, distribution, and labeling of pesticides, as well as the certification and training of pesticide applicators. FIFRA establishes recordkeeping and reporting requirements on certified applicators of restricted use pesticides. Furthermore, FIFRA imposes storage, disposal, and transportation requirements on registrants and applicants for the registration of pesticides. Pesticide use is regulated through requirements to apply pesticides in a manner consistent with the label. The labeling requirement includes directions for use, warnings, and cautions along with the uses for which the pesticide is registered (e.g., pests and appropriate applications). This includes the specific conditions for the application, mixture, and storage of the pesticide. Additionally, the label must specify a time period for re-entry into an area after the pesticide has been applied, and when crops may be harvested after the application of the pesticide. If a pesticide is used in a manner contrary to specifics on its label, then the use constitutes a violation of the FIFRA.

Hazardous Communication Standard

The Occupational Safety and Health Administration (OSHA) helps ensure employee safety by regulating the handling and use of chemicals in the workplace. For instance, it administers the HCS. The HCS ensures safety in the workplace concerning chemicals through requiring information to be provided and understood by workers about the identity and hazards associated with chemicals they may work with. This also requires that chemical manufactures and importers evaluate the hazards associated with the chemicals they create or import, and that these chemicals have proper labels and material safety data sheets concerning their hazards to others (e.g., customers). Downstream of the production, employers who utilize these hazardous chemicals in their workplaces are obligated to have labels and safety data sheets for their workers and to train them on the proper handling of these chemicals.

Hazardous Substances Act

The Consumer Product Safety Commission has a limited role in regulating hazardous substances; it primarily deals with the labeling of consumer products through the federal Hazardous Substances Act (HSA). HSA only requires products that may at some point be in the presence of people's dwellings to be labeled, including during purchase, storage, or use. These labels must alert consumers of the potential hazards that the product may pose. However, for a product to be required for labelling, the product must be toxic, corrosive, flammable/combustible, an irritant, a strong sensitizer, or have the ability to generate pressure through decomposition, heat, or other means. Furthermore, the product must possess the ability to cause severe personal injury or substantial illness during or as a result of any customary or reasonably predictable handling or use, including reasonably foreseeable ingestion by children.

Toxic Substances Control Act

The federal Toxic Substances Control Act (TSCA), as amended by the Frank R. Lautenberg Chemical Safety for the 21st Century Act, permits the USEPA to evaluate the potential risk from novel and existing chemicals and address unacceptable risks chemicals may have on human health and the environment. The USEPA oversees the production, importation, use, and disposal of certain chemicals. This includes the USEPA having the authority to require record keeping, reporting, and test requirements and restrictions associated with certain chemical substances and/or mixtures. However, certain groups of chemicals are excluded from TSCA consideration, including—but not limited to—food, drugs, cosmetics, and pesticides. Examples of chemicals included in TSCA consideration are lead paint, asbestos, mercury, formaldehyde, and polychlorinated biphenyls.

Emergency Planning and Community Right-to-Know Act

The federal Emergency Planning and Community Right-to-Know Act (EPCRA) is designed to assist local communities protect public health, safety, and the environment from chemical hazards. The Community Right-to-Know provisions help increase the public's knowledge and access to information on chemicals at individual facilities, their uses, and releases into the environment.

The EPCRA also requires industry to report on the storage, usage, and releases of hazardous substances to federal, state, and local governments, and states and communities can use the information gained to improve chemical safety and protect public health and the environment.

C11-1.2 State and Local

Wilton Rancheria Building and Safety Code

See **Section C-1-1.2** for a description of the Tribe's Building Code.

City of Elk Grove General Plan

Policies in the General Plan (updated 2023) that are relevant to the hazards and hazardous materials in the vicinity of the Project are from the Services, Health, and Safety Element and include the following policies:

Policy EM-1-1: Seek to maintain acceptable levels of risk of injury, death, and property damage resulting from reasonably foreseeable safety hazards.

Policy ER-1-4: Work to identify and eliminate hazardous waste releases from both private companies and public agencies.

Policy ER-1-5: Storage of hazardous materials and waste will be strictly regulated, consistent with State and federal law.

Policy ER-1-7: To the extent feasible, uses requiring substantial transport of hazardous materials should be located such that traffic is directed away from the City's residential and commercial areas.

Policy ER-4-2: Work with the CCSD to develop a fire prevention plan that lists major fire hazards, proper handling and storage procedures for hazardous materials, potential ignition sources and their control, and the type of fire protection equipment necessary to control each major hazard.

C11-2 Environmental Setting

Additional information on the existing setting can be found in the Phase I ESA in **Appendix H**.

C11-2.1 Hazardous Materials

The regulatory agency database search was conducted by EDR in June of 2023. A reconnaissance inspection was completed by Acorn Environmental on June 26, 2023 for the Project Site to determine if any RECs occur (**Appendix H**). The Phase I ESA has been prepared in conformance with the BIA guidelines (602 DM 2) and the American Society for Testing and Materials (ASTM) Standard Practice E 1527-21. Additionally, a site visit was conducted in July of 2025 (**Appendix C4**).

Under the ASTM Standard Practice E 1527-21, RECs are defined as the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. The Phase I ESA performed a review of relevant database listings of hazardous material sites, waste generators, above ground storage tanks and UST, review of historical topographic maps and aerial photographs of the Project Site, and interviews with owners, operators, occupants, and/or local government officials to determine if RECs occur on the Project Site or within the vicinity.

Database queries performed for the Phase I ESA noted no listed cases of hazardous materials involvement on the Project Site. Noted cases in the vicinity of the Project Site have either been mitigated and closed or are under continued regulatory oversight by the appropriate agencies (**Appendix H**). The 2023 Phase I ESA determined that there are no RECs identified in connection with the Project Site. Based on site conditions during the June 2023 inspection, EDR report, information provided in a previously prepared Phase I ESA, and records review, no RECS, controlled RECs, business ECs, historical RECs, or de minimis conditions were identified in connection with the Project Site. The 2005 Phase I ESA did not identify any concerns related to the Project Site.

The SWRCB GeoTracker database, the California DTSC EnviroStor database, and the USEPA Enforcement and Compliance History Online (ECHO) database were searched for documentation of local hazardous materials (Appendix A of **Appendix H**). The Project Site was not listed on the GeoTracker, EnviroStor, or ECHO databases. The database search showed six EnviroStor sites within one mile of the Project Site. Additionally, there is one recorded solid waste facility/landfill site within a half mile of the Project Site, on Elkmont Drive. There are three leaking underground storage tanks (LUST) sites within a half mile, all of which are closed cases (Appendix A of **Appendix H**). Two closed Cleanup Program Sites were reported within a half mile of the Project Site. There are three registered underground storage tanks (USTs) and one aboveground storage tank (AST) within a quarter mile of the Project Site (Appendix A of **Appendix H**).

C11-2.2 Wildfire History and Risk

In 2024, 8,110 wildfires occurred and burned a total of 83,210 acres across the State (CAL FIRE, 2024). Of those fires, 11 were in Sacramento County, but none of them were within the City of Elk Grove. The 2024 wildfire season slightly exceeded the five-year average for the number of wildfires, but was below the average for acres burned between 2020 and 2024. The high 5-year averages were partially due to the historically low rainfall and severe ongoing drought, especially for fires in 2020 (CAL FIRE, 2020). In 2025 so far, 4,759 fires have been counted and burned a total of 228,215 acres across the State (CAL FIRE, 2025a). Of these, Sacramento County experienced two fires, burning approximately 114 acres, none of which occurred in Elk Grove (CAL FIRE, 2025a). The Project Site is located within a Local Responsibility Area, meaning the financial responsibility of preventing and suppressing wildfires is primarily the responsibility of the City. The Project Site is not within a designated Fire Hazard Severity Zone (FHSZ), which classify a wildland zone as moderate, high, or very high fire hazard based on the average hazard across the area included in the zone (CAL FIRE, 2025b). There are no designated FHSZ in the vicinity of the Project Site.

C11-3 Impact Assessment

C11-3.1 Assessment Criteria

Impacts associated with hazardous materials include potential releases of hazardous materials and improper hazardous material management associated with development. A significant hazardous material impact would occur if the Project Site were to contain existing hazardous materials that would require remediation or mitigation prior to development. Additionally, if development were to result in the use, handling, or generation of a controlled hazardous materials such that the regulated amount would increase the potential risk of exposure that would result in the reduction in the quality or loss of life, such an impact would be considered significant. Impacts would also be considered significant if Alternative A were to increase wildfire risks onsite or in the surrounding area. This includes, but is not limited to, increasing fuel loads, exacerbating the steepness of the local topography, introducing uses that would increase the chance of igniting fires, reducing fire barriers, inhibiting local emergency response to or evacuation routes from wildfires, building in a high-risk fire zone without project design measure to reduce inherent wildfire risk, and conflicting with a local wildfire management plan.

C11-3.2 Alternative A– Proposed Project

Hazardous Materials

As described in **Section C11-2**, no hazardous materials or RECs were identified in association with the Project Site. The site is currently undeveloped but has previously been graded and the Phase I ESA found that previous development displayed no signs of potential hazards. Potential construction and operation-related impacts related to hazardous materials are further discussed below.

Construction

Limited quantities of standard hazardous materials may be used during construction, including gasoline, diesel fuel, motor oil, hydraulic fluid, solvents, cleaners, sealants, welding flux, various lubricants, paint, paint thinner, and other products. As with any liquid and solid, during handling and transfer from one container to another or general usage, the potential for an accidental release exists. Depending on the relative hazard of the material, if a spill were to occur of significant quantity, the accidental release could pose both a hazard to construction employees as well as to the environment. Construction BMPs required within the NPDES Construction General Permit limit and often eliminate the impact of such accidental releases. Contact with stormwater during construction is the primary means of transporting these contaminants offsite. BMPs in **Appendix B** would minimize potential construction-related impacts associated with runoff. During transportation of hazardous materials off- and onsite, the transporters of hazardous materials would be required to adhere to applicable State, federal, and local regulations. This would ensure that the transportation of hazardous materials to and from the Project Site would not result in spills. Once onsite, BMPs listed in **Appendix B** would reduce the probability of accidental onsite release through spill prevention methods and utilizing proper equipment. Furthermore, onsite hazardous chemicals would be used and stored per federal regulations and manufacturer guidelines would be followed.

Therefore, the impacts from Alternative A from the routine transport, use, or disposal of hazardous materials during construction would be less than significant and no mitigation measures are warranted.

Operation

During operation, common hazardous materials may be used on the site, including motor oil, hydraulic fluids, solvents, cleaners, lubricants, and paints etc. Hazardous materials would be stored, handled, and disposed of according to federal manufacturer's guidelines and federal law. Any solid waste produced onsite would be stored, handled, and disposed of by adhering to applicable federal and state regulations. Alternative A would not result in significant adverse effects related to waste production and hazardous materials and no mitigation measures are warranted.

Wildfire Risk

Construction

During construction, the operation of equipment could create sparks or fire that could ignite the vegetation within the Project Site, which could then create a wildfire. Examples of construction equipment that could ignite a fire and thus increase risks include power tools and acetylene torches. As described in **Section C11-2**, the Project Site is not within nor in the vicinity of a designated FHSZ. With no severity zone rating, the chance of a fire during construction is possible, although unlikely considering the low risk. Minimal vegetation on the Project Site minimizes the available fuel that could start or transmit a fire if a spark were to occur during construction. Furthermore, BMPs provided in **Appendix B** would reduce the probability of igniting a fire by keeping the work area clear of fire fuels, trash, and debris. Therefore, the potential for fire ignition during construction is less than significant and no mitigation measures are warranted.

Operation

Construction would adhere to the Tribe's Building Code, which adopts standards at least as stringent as the California Building Code and the California Public Safety Code applicable to the County of Sacramento. These codes include comprehensive provisions related to fire safety, including the use of fire-resistant materials, requirements for safe and accessible means of ingress (for the fire department) and egress, and the installation and maintenance of fire protection systems, including fire sprinklers and fire alarms, and smoke control systems. Therefore, impacts associated with exposing people or structures to a significant risk of loss, injury, or death involving ignition of wildland fires during operation of Alternative A are less than significant and no mitigation measures are warranted.

C11-3.3 Alternative B – No Action

No development would occur under this alternative, and the Project Site would remain in its current state. No hazardous material impacts would occur under the No Action alternative.

C11-4 Mitigation Measures

There are no mitigation measures for hazardous materials.

C12 VISUAL RESOURCES

C12-1 Regulatory Setting

C12-1.1 State and Local

California State Scenic Highway Program

In 1963, the California State Legislature established the California Scenic Highway Program through Senate Bills 1467 and 1468, provisions of which were added to the Streets and Highways Code. The goal of the California Scenic Highway Program is to preserve and enhance the natural beauty of California, with scenic highways being designated based upon the amount of natural landscape visible to a passing motorist. Scenic highway designation does not preclude nearby development; however, the program encourages development that does not degrade the scenic value of the highway corridor. Scenic highways are designated based upon the amount of natural landscape visible to a passing motorist, with the goal of preserving and enhancing the natural beauty of California. The program does preclude development near a scenic highway, rather it encourages development that does not degrade the scenic value of the corridor.

Wilton Rancheria Building and Safety Code

See **Section C-1-1.2** for a description of the Tribe's Building Code.

Title 24 Outdoor Lighting Zones

The California Energy Code includes mandatory requirements for outdoor lighting such as maximum brightness and shielding. These requirements vary based on the Lighting Zone the building is located in. Lighting Zones range from Zone 0 (undeveloped open spaces) to Zone 3 (urban areas). Lighting Zone 4 can only be designated when a local government applies for exceptionally high lighting allowances. Lighting Zones are intended to help limit light pollution and ensure light levels are appropriate for the region.

City of Elk Grove General Plan

The Urban and Rural Development Element of the City's General Plan contains goals and policies related to the visual character of the City. The General Plan addresses street-front visual character, the preservation of trees and urban forest, and outlines how special planning areas allow for customized standards to protect and enhance visual quality. The General Plan goals and policies include the following:

Goal LU-5: Consistent, High-Quality Urban Design.

Policy LU-5-1: Ensure that new development reflects the City's desire to create a high-quality, attractive, functional, and efficient built environment.

Policy LU-5-2: Provide and implement regulations that encourage high-quality signage, ensure that businesses and organizations can effectively communicate through sign displays, promote wayfinding, achieve visually vibrant streetscapes, and control excessive visual clutter.

Policy LU-5-5: Improve the visual appearance of business areas and districts by applying high standards for architectural design, landscaping, and signs for new development and the reuse or remodeling of existing buildings.

Lent Ranch SPA

The Lent Ranch Marketplace SPA plan is a comprehensive document that is intended to provide for, guide, and control the nature of development within the planning area. Goals and objectives related to visual resources include the following:

To provide a visually pleasing urban project that will enhance the aesthetic and visual quality of the neighborhood, on a site that is designated in the General Plan for Urban Development.

To promote development in an orderly, comprehensive and cohesive manner for the entire project site and prevent the piecemeal development of the site with a mix of incompatible uses which could otherwise result.

Minimize adverse visual and environmental impacts of large paved areas through the use of perimeter plantings and the dispersal of landscaped islands within parking lot areas.

Elk Grove Zoning Code

The purpose of the Elk Grove code is to carry out the policies of the Elk Grove General Plan by classifying and regulating land use and development within the City. The code provides standards and guidelines for the orderly growth and development of the City in order to protect the characteristics and community identity of Elk Grove. The Zoning Code has specific regulations for outdoor lighting and landscaping within the City:

- **Lighting:** shield outdoor lighting to prevent light pollution and minimize glare, maintain specific illumination levels depending on the area being illuminated (parking lots, pedestrian walkways, exterior doors, etc.), maximum lighting fixture heights depending on adjacent properties (max. 20 ft adjacent to residential/agricultural property, max. 30 ft all other locations), use energy efficient lighting fixtures, use automatic timers for all new lights (turning off between 10 p.m. and 6 a.m. unless the site remains operational, lighting flags, or lighting is for security)
- **Landscaping:** enhance project appearance and buffer between land uses, reduce urban heat and glare, conserve water, and ensure the ongoing health of planted areas. The code requires a licensed landscape architect to design landscaping plans, which must meet minimum area, planting size, and species diversity standards. Landscaping must use drought-tolerant, water-efficient plants and automatic irrigation to minimize water waste and runoff onto adjacent properties. Specific requirements ensure landscaped setbacks, shaded parking lots, visual screening of parking and drive-through areas, and buffers between commercial and residential uses. All landscaped areas must be permanently maintained for health, appearance, and safe pedestrian/vehicle access.

C12-2 Environmental Setting

C12-2.1 Views and Viewsheds

A viewshed is comprised of one or more viewing corridors or vistas from a specific location or viewpoint. Each vista provides a line-of-sight that can be characterized uniquely from among other vistas within the viewshed. The following constituent elements compose the visual experience within each vista:

- Clarity in line of sight: overall visibility of the object within the viewshed, this can be influenced by trees, buildings, topography, or other potential visual obstructions within the viewshed.
- Duration of visibility: amount of time the object is exposed to viewers within the viewshed.
- Proximity of the viewer: effects of foreshortening due to the distance of the viewer from the object will influence the dominance of the object in the perspective of the viewer within the viewshed.
- Number of viewers: number of viewers anticipated to experience the visual character of the object in a forward-oriented view. Densely populated residential districts or busy highways within the viewshed will present more viewers than in unpopulated areas.

Viewsheds and viewpoints are described by expressing the strength of the viewing experience, framed within the analytical criteria listed above. Viewing experiences are personal and subjective in nature, but if the above elements are used it allows for a more objective, baseline assessment of the visual environment and visual impacts. There is not a comprehensive list of specific features that are automatically considered as a scenic resource, but certain characteristics can be identified that can contribute to its determination. The following represent some visual qualities that may indicate the presence of a scenic resource:

- Massive rock formation
- Tree with age or interesting features
- Historical value plantings
- Historic buildings
- Feature with local, regional, or statewide importance
- Feature specifically identified in planning documents as having a special scenic value.

There are no scenic resources present on or in the vicinity of the Project Site, including scenic highways or byways, scenic rivers, or historic monuments. There are no state designated scenic highways or roads in the vicinity of the Project Site. The nearest State designated scenic highway is State Route 160, which is located 7.95 miles to the west of the Project Site along the Sacramento River (Caltrans, 2025). The nearest federally designated national scenic byway is the Ebbetts Pass Scenic Byway, approximately 55 miles east of the Project Site (USDOT, 2025). The nearest designated wild and scenic river is the Lower American River, more than 12 miles north of the Project Site (National Wild and Scenic River System [NWSRS], 2025b).

The Project Site is visible from nearby residences and roadways in the vicinity. Viewsheds for the Project Site would include the view from the residences west of the Project Site, views from motorists traveling along Kammerer Road, and views from motorists traveling along SR-99 east of the Project Site (see Figure 10 in **Appendix A**). The Project Site could also be visible from local roadways such as Lent Ranch Parkway, Trill Way, Bilby Road, and Promenade Parkway. The Project Site is currently undeveloped and used for hay production. The Project Site and the vicinity are relatively flat and are surrounded by development, as noted in **Appendix C8**, including housing developments to the west, commercial and entertainment buildings such as the Tribe's Casino to the east, a Kaiser facility to the north, and SR-99 beyond the Casino east. The existing development on tribal trust land adjacent to the Project Site can be seen from all viewsheds.

C12-3 Impact Assessment

C12-3.1 Assessment Criteria

Impacts related to visual resources would be considered significant if development were to adversely affect a scenic vista or scenic resource, substantially degrade the existing visual character or quality of the site and its surroundings, or create new sources of substantial light or glare that would adversely affect day or nighttime views in the area.

C12-3.2 Alternative A – Proposed Project

Portions of Alternative A would be directly visible from SR-99 and Kammerer Road, but these are not designated as a State scenic highways or scenic routes (Caltrans, 2025). Development of Alternative A would result in a new, permanent commercial facilities. Alternative A development components would be consistent with the land uses outlined in the Lent Ranch SPA and would be consistent with the existing surrounding visual character of the area. BMPs related to lighting and landscaping are included in **Appendix B** to further reduce potential impacts associated with visual resources. Alternative A would not interrupt or substantially alter local views, damage scenic resources, or create any sources of glare or excessive nighttime illumination with adherence to the Tribe's Building Code which incorporates the California Energy Code (Title 24, Part 6), as applicable to the County of Sacramento. The California Energy Code requires light pollution reduction measures for nonresidential development to limit backlight, uplight, and glare. Proposed development is anticipated to generally conform to the visual resources goals outlined in the Lent Ranch SPA and City General Plan, although once the property is taken into federal trust, City regulations and zoning would no longer apply. Visual impacts would be less than significant and no mitigation measures are warranted.

C12-3.3 Alternative B – No Action

Under the No Action alternative, the Project Site would remain in its current state. Any future development of the Project Site would be required to meet City design standards.

C12-4 Mitigation Measures

There are no mitigation measures for visual resources.

C13 OTHER REASONABLY FORESEEABLE IMPACTS

This section assesses the potential for development to contribute to reasonably foreseeable future environmental impacts. For the purposes of this analysis, the reasonably foreseeable setting includes growth and development envisioned in the City of Elk Grove 2014 General Plan, as amended, and major development projects that are under construction or are planned for future construction within the City. Alternative A is located within an area previously planned for urban development under the Lent Ranch SPA, which includes multi-family residential uses, community commercial and visitor commercial uses including retail, office, and entertainment space (City of Elk Grove, 2000). These previously planned uses are generally consistent with the reasonably foreseeable development scenario proposed under Alternative A. There would be no development under Alternative B and thus is alternative is not discussed further in this section.

Reasonably foreseeable impacts for each environmental issue area are discussed below. Key major development projects within a one-mile radius include but are not limited to those listed in **Table C13-1**. Additionally, the Tribe is pursuing a separate fee-to-trust acquisition more than five miles west of the Project Site in Sacramento County.

Table C13-1: Reasonably Foreseeable Projects

Project Name	Distance from Project Site (Miles)	Project Description	Status
Sky River Casino Expansion	Less than 0.05 miles east and south	Expansion of the existing Sky River Casino, including the construction of a hotel, convention center, and expansion of the gaming floor	Construction is underway
Maverik Fueling Station	0.42 miles east and southeast	Construction and operation of a new fueling station with convenience store	In Plan Review
Souza Dairy Villages	0.39 miles northwest	Master plan design and review for construction of several hundred homes of varying sizes	Construction is underway
Grant Line Construction Aggregate Production and Recycling Facility	0.94 miles northeast	Conditional use permit and major design review to construct and operate an aggregate materials production and recycling facility on a 25-acre site	Plans have been approved, awaiting construction
Triangle Point Development	0.85 miles east	A master plan design review for housing development and design review for construction of a commercial center that includes a fueling station, car wash, drive thru restaurants, etc.	The north commercial center has been approved for construction
Mountain Elk Villas	0.52 miles northwest	Major design review to add a new 174-unit, high density, 100% affordable housing development	Under review
Capital SouthEast Connector	Adjacent to the southern boundary	34-mile multi-lane expressway connecting multiple cities in the region, including Elk Grove	Construction is underway

Source: City of Elk Grove, 2025b; Acorn Environmental, 2024

As described in **Appendices C1** through **C12**, Alternative A would not result in significant impacts with the implementation of mitigation measures listed in the respective appendices. Reasonably foreseeable effects in combination with development projects listed in **Table C13-1** are discussed below and would not result in new or significant impacts.

C13-5 Land and Water Resources

Approved developments would be required to follow applicable permitting procedures and development codes. Local permitting requirements for construction would address regional geotechnical and topographic conflicts, seismic hazards, and resource extraction availability.

Stormwater discharges from developed sites could increase the chance of downstream pollution and flooding, and runoff characteristics of a watershed are altered when impervious surfaces replace natural vegetation. Alternative A includes minimal grading and alteration of drainage patterns, and stormwater would be directed to an appropriately-sized detention basin to limit off-site stormwater flows to pre-development levels. Additionally, Alternative A would develop a project-specific SWPPP with BMPs to address potential runoff impacts, and other projects disturbing over one acre would be required to implement a SWPPP as well. Lastly, as discussed in Section 3.2 of the **EA**, the City has evaluated their water resources and determined that sufficient water sources remain within permitted water diversions through 2045. Therefore, implementation of Alternative A in combination with other reasonably foreseeable development would not result in significant effects to land and water resources.

C13-6 Air Quality

Reasonably foreseeable development in the region will include land and roadway development necessary to accommodate the City's planned growth for this area. Such development will increase the potential for air quality impacts. Reasonably foreseeable air quality impacts will occur if projects in the region cause exceedances of the State or National Ambient Air Quality Standards. Alternative A would not result in significant contributions to these potential impacts. Operation of Alternative A would result in the generation of mobile emissions from vehicles trips and stationary source emissions (e.g., combustion of natural gas in heating units). Emissions of criteria pollutants associated with Alternative A are below *de minimis* levels and therefore are considered to be less than significant. In the coming decades, operational emissions are expected to decrease due to improved fuel efficiency technology and stricter federal and State regulations. Additionally, operational emissions would be reduced with implementation of BMPs described in **Appendix B**, including compliance with applicable building standards, and use of energy and water saving appliances. Reasonably foreseeable air quality effects from operation of Alternative A would be less than significant.

CO₂e emissions resulting from Alternative A are primarily indirect (indirect mobile emissions from delivery, patron, and employee vehicles). The federal government has enacted measures that would reduce GHG emissions from mobile sources over time. BMPs, as described in **Appendix B**, would reduce project-related CO₂e emissions, such as reducing the idling of heavy equipment and thus CO₂e emissions. Operational BMPs would reduce indirect CO₂e emissions from electricity use, water use, and waste transport through the use of energy-efficient fixtures, low-flow appliances, drought-resistant landscaping, and recycling receptacles.

Operational BMPs would also reduce indirect mobile CO₂e emissions by ensuring adequate ingress and egress to minimize vehicle idling. Development-related CO₂e emissions have been quantified for the operational year 2028 and are shown in **Table C3-9**. With the implementation of BMPs provided in **Appendix B**, reasonably foreseeable air quality effects resulting from CO₂e emissions would be less than significant.

Table 3.4-2: Construction and Operation CO₂e Emissions – Alternative A

Direct	MT of CO₂e
Construction Total (grading, building, etc.)	1,443.1
Indirect	MT of CO₂e/year
Area	11.2
Energy	1,296
Mobile	16,030
Solid Waste	180
Water/Wastewater	43.8
Construction CO₂e Emissions	1,443.1
Annual Operation CO₂e Emissions	17,561

Notes: CO₂e = carbon dioxide equivalent; MT = metric tons

Source: **Appendix D**

C13-7 Biological Resources

Alternative would avoid development impacts to aquatic resources and would not impact federally listed species. Although Alternative A has the low potential to impact nesting migratory birds/raptors, potential impacts would be less than significant as BMPs in **Appendix B** would be implemented. Additionally, other development projects in the region would be required to implement similar measures to protect sensitive biological resources in accordance with federal, State, and local regulations. Therefore, development would not contribute to significant effects to biological resources.

C13-8 Cultural and Paleontological Resources

No known known historic properties that met the criteria for inclusion on the NRHP or paleontological resources were identified within the Project Site or immediate vicinity. Implementation of mitigation measures in **Appendix C5** would reduce potential impacts to unknown subsurface cultural resources on the Project Site to a less-than-significant level and other development projects in the region would be required to implement similar mitigation measures. Therefore, development of the project would not contribute to significant adverse reasonably foreseeable effects to cultural resources.

C13-9 Socioeconomic Conditions

As described in **Appendix C6**, Alternative A would result in minimal socioeconomic impacts at both the local and regional levels.

While Alternative A may lead to increases in demand for public services and a reduction in local property tax revenue due to the transition to trust land status, these effects would be offset through economic stimulation to the economy and mitigation measures identified in **Appendix C6** to reduce financial impacts to police and fire protections services. Alternative A would not induce population growth or substantial shifts in regional economic patterns that could result in significant effects. Furthermore, because Alternative A is consistent with land uses envisioned in the Lent Ranch SPA and Elk Grove General Plan, its economic footprint has been accounted for in long-range municipal service and land use planning. Therefore, Alternative A would not contribute significantly to any adverse socioeconomic effects.

C13-10 Transportation and Circulation

Any future development in the area would be subject to City review, which would include assessing the potential impacts of increased traffic on local roadways and the usage of pedestrian facilities and public transit. Any significant impacts identified would be addressed through the collection of traffic impact fees or installation of improvements. Additionally, the Capital SouthEast Connector, which is currently under construction, would improve local and regional traffic circulation along Kammerer Road along the southern boundary of the Project Site and on Grant Line Road by expanding roadway capacity and improving connectivity to I-5. Alternative A would result in a daily increase in traffic that would be mitigated by amending the existing MOU between the Tribe and the City. The amended MOU would include an appropriate fair-share contribution associated with added trips generated by Alternative A. Alternative A impacts to pedestrian and bicycle facilities and transit service would be less than significant. Therefore, implementation of Alternative A would not contribute to reasonably foreseeable effects on the transportation system.

C13-11 Land Use

Alternative A is consistent with regional development plans, specifically the Lent Ranch SPA and the City of Elk Grove General Plan and thus is not anticipated to result in land use conflicts or conversion of agricultural uses. Thus Alternative A would not contribute to any significant impacts to land use and agricultural uses when considered with other reasonably foreseeable development.

C13-12 Public Services

As discussed in **Section C13-1** above, Alternative A is consistent with the level of development planned in the approved Lent Ranch SPA and portions of the SPA have already been developed. The Tribe would coordinate with SCWA, SASD, SMUD and PG&E to connect to existing utility infrastructure designed to serve the SPA and would pay for service accordingly. Alternative A would not result in substantial population growth or housing that could increase demands on schools or parks. Future development in the region may require expanded law enforcement and fire protection services. Mitigation included in **Appendix C9** would ensure the Tribe would make good faith efforts to amend the existing MOU to address the potential increase in calls attributable to Alternative A. Other development projects would contribute to funding of public services through development impact fees and taxes. Therefore, implementation of Alternative A would not contribute to reasonably foreseeable effects on public services and utilities.

C13-13 Noise

Future development would generate noise and could be noticeable in combination with Alternative A, but as described in **Appendix C10**, both construction and operation of Alternative A are not expected to cause a significant noise impact with mitigation. During construction, incorporation of BMPs described in **Appendix B** and mitigation measures in **Appendix C10** would reduce construction noise and vibration and limit working hours to be consistent with both federal and local thresholds. During operation, reasonably foreseeable components of Alternative A are not anticipated to generate substantial onsite noise. Uses such as retail, office space, and entertainment venues typically generate moderate and intermittent noise levels that are not expected to be perceptible beyond the Project Site. Additionally, anticipated increases in traffic would primarily occur along Promenade Parkway near SR-99, a high-volume corridor with existing ambient noise levels estimated around 65 dBA. Because a doubling of traffic volumes would be required to generate a perceptible 3 dBA increase in noise, and Alternative A would not generate sufficient trips to meet that threshold, ambient noise levels are expected to remain below 67 dBA. Thus, Alternative A would not contribute toward reasonably foreseeable adverse impacts. Future development in the vicinity of the Project Site would be required to comply with applicable noise regulations during construction and operation, which would reduce their potential adverse effects. Therefore, no significant reasonably foreseeable noise effects would occur.

C13-14 Hazardous Materials

There are no significant reasonably foreseeable hazardous materials impacts associated with Alternative A, and BMPs listed in **Appendix B** would be implemented to further reduce such risks. There is low potential for impacts related to wildfire hazards in combination with other development. New development would be required to adhere to federal, State, and local building codes and fire protection codes and standards. As described in **Appendix C11**, with the implementation of BMPs to reduce inherent wildfire risk (**Appendix B**) and mitigation measures included in **Appendix C11**, construction or operation of Alternative A would not increase wildfire risk onsite or in the surrounding area or inhibit local emergency response to or evacuation from wildfire. Therefore, Alternative A would not contribute to reasonably foreseeable impacts associated with hazardous materials or wildfire.

C13-15 Visual Resources

Alternative A would be compatible with existing and planned mixed-use commercial development for the Project Site, as well as the Lent Ranch SPA that was approved and outlines the development of the Project Site. Any future non-tribal development in the vicinity would be subject to City or County review and approval. Therefore, development of Alternative A in combination with other development in the vicinity would not result in significant reasonably foreseeable effects to visual resources.

Appendix D: Air Quality Output Files

Lent Ranch v2 Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Lent Ranch v2
Construction Start Date	3/2/2026
Operational Year	2028
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.00
Precipitation (days)	36.6
Location	38.37543171161565, -121.38359781550088
County	Sacramento
City	Elk Grove
Air District	Sacramento Metropolitan AQMD
Air Basin	Sacramento Valley
TAZ	712
EDFZ	13
Electric Utility	Sacramento Municipal Utility District
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.30

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
Regional Shopping Center	550	1000sqft	12.6	550,000	—	—	—	—

Parking Lot	2,750	Space	24.7	0.00	—	—	—	—
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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.	3.71	3.12	27.3	28.7	0.06	1.12	9.41	10.5	1.03	3.70	4.73	—	6,911	6,911	0.29	0.47	13.2	7,072
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	138	138	29.2	29.5	0.06	1.24	19.8	21.1	1.14	10.1	11.3	—	6,796	6,796	0.31	0.47	0.34	6,840
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	11.4	11.4	11.1	14.8	0.03	0.37	3.17	3.54	0.34	1.22	1.56	—	4,475	4,475	0.19	0.30	3.40	4,572
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.08	2.08	2.03	2.70	0.01	0.07	0.58	0.65	0.06	0.22	0.28	—	741	741	0.03	0.05	0.56	757

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

2026	3.71	3.12	27.3	28.7	0.06	1.12	9.41	10.5	1.03	3.70	4.73	—	6,911	6,911	0.29	0.47	13.2	7,072
2027	2.19	1.80	14.0	23.9	0.04	0.37	2.46	2.83	0.34	0.60	0.95	—	6,817	6,817	0.28	0.45	11.9	6,971
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	3.81	3.21	29.2	29.5	0.06	1.24	19.8	21.1	1.14	10.1	11.3	—	6,796	6,796	0.31	0.47	0.34	6,840
2027	3.09	2.95	14.4	21.4	0.04	0.37	2.46	2.83	0.35	0.60	0.95	—	6,602	6,602	0.29	0.46	0.31	6,745
2028	138	138	6.67	10.5	0.01	0.26	0.36	0.41	0.24	0.08	0.27	—	1,654	1,654	0.06	0.02	0.03	1,661
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.57	1.30	11.1	14.4	0.03	0.37	3.17	3.54	0.34	1.22	1.56	—	3,985	3,985	0.17	0.22	2.53	4,057
2027	1.57	1.27	9.78	14.8	0.03	0.26	1.59	1.86	0.24	0.39	0.63	—	4,475	4,475	0.19	0.30	3.40	4,572
2028	11.4	11.4	0.26	0.49	< 0.005	0.01	0.03	0.04	0.01	0.01	0.02	—	84.6	84.6	< 0.005	< 0.005	0.05	85.2
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.29	0.24	2.03	2.62	< 0.005	0.07	0.58	0.65	0.06	0.22	0.28	—	660	660	0.03	0.04	0.42	672
2027	0.29	0.23	1.79	2.70	0.01	0.05	0.29	0.34	0.04	0.07	0.12	—	741	741	0.03	0.05	0.56	757
2028	2.08	2.08	0.05	0.09	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	14.0	14.0	< 0.005	< 0.005	0.01	14.1

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.	97.0	91.6	51.6	530	1.09	0.89	93.5	94.4	0.84	23.7	24.6	398	118,127	118,525	37.1	5.07	314	121,277
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	85.0	79.6	59.9	453	0.99	0.85	93.5	94.3	0.81	23.7	24.5	398	108,644	109,042	38.0	5.54	10.7	111,654

Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	86.8	81.7	53.3	430	0.94	0.83	84.4	85.2	0.78	21.4	22.2	398	103,121	103,519	37.3	5.02	127	106,075
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	15.8	14.9	9.73	78.5	0.17	0.15	15.4	15.5	0.14	3.91	4.05	65.9	17,073	17,139	6.18	0.83	21.0	17,562

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	79.6	74.6	50.1	505	1.08	0.75	93.5	94.2	0.70	23.7	24.4	—	110,106	110,106	5.33	4.85	311	111,994
Area	17.2	16.9	0.20	23.9	< 0.005	0.04	—	0.04	0.03	—	0.03	—	98.4	98.4	< 0.005	< 0.005	—	98.7
Energy	0.14	0.07	1.30	1.09	0.01	0.10	—	0.10	0.10	—	0.10	—	7,809	7,809	0.35	0.03	—	7,828
Water	—	—	—	—	—	—	—	—	—	—	—	87.1	113	200	0.30	0.19	—	265
Waste	—	—	—	—	—	—	—	—	—	—	—	311	0.00	311	31.1	0.00	—	1,089
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.64	2.64
Total	97.0	91.6	51.6	530	1.09	0.89	93.5	94.4	0.84	23.7	24.6	398	118,127	118,525	37.1	5.07	314	121,277
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	71.9	66.5	58.6	452	0.98	0.75	93.5	94.2	0.71	23.7	24.4	—	100,721	100,721	6.23	5.32	8.07	102,470
Area	13.0	13.0	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.14	0.07	1.30	1.09	0.01	0.10	—	0.10	0.10	—	0.10	—	7,809	7,809	0.35	0.03	—	7,828
Water	—	—	—	—	—	—	—	—	—	—	—	87.1	113	200	0.30	0.19	—	265
Waste	—	—	—	—	—	—	—	—	—	—	—	311	0.00	311	31.1	0.00	—	1,089
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.64	2.64
Total	85.0	79.6	59.9	453	0.99	0.85	93.5	94.3	0.81	23.7	24.5	398	108,644	109,042	38.0	5.54	10.7	111,654

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	70.8	65.9	51.9	413	0.93	0.70	84.4	85.1	0.66	21.4	22.1	—	95,131	95,131	5.54	4.80	124	96,823
Area	15.9	15.7	0.14	16.4	< 0.005	0.03	—	0.03	0.02	—	0.02	—	67.4	67.4	< 0.005	< 0.005	—	67.6
Energy	0.14	0.07	1.30	1.09	0.01	0.10	—	0.10	0.10	—	0.10	—	7,809	7,809	0.35	0.03	—	7,828
Water	—	—	—	—	—	—	—	—	—	—	—	87.1	113	200	0.30	0.19	—	265
Waste	—	—	—	—	—	—	—	—	—	—	—	311	0.00	311	31.1	0.00	—	1,089
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.64	2.64
Total	86.8	81.7	53.3	430	0.94	0.83	84.4	85.2	0.78	21.4	22.2	398	103,121	103,519	37.3	5.02	127	106,075
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	12.9	12.0	9.47	75.3	0.17	0.13	15.4	15.5	0.12	3.91	4.03	—	15,750	15,750	0.92	0.79	20.6	16,030
Area	2.90	2.86	0.03	2.99	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	11.2	11.2	< 0.005	< 0.005	—	11.2
Energy	0.03	0.01	0.24	0.20	< 0.005	0.02	—	0.02	0.02	—	0.02	—	1,293	1,293	0.06	0.01	—	1,296
Water	—	—	—	—	—	—	—	—	—	—	—	14.4	18.7	33.1	0.05	0.03	—	43.8
Waste	—	—	—	—	—	—	—	—	—	—	—	51.5	0.00	51.5	5.15	0.00	—	180
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.44	0.44
Total	15.8	14.9	9.73	78.5	0.17	0.15	15.4	15.5	0.14	3.91	4.05	65.9	17,073	17,139	6.18	0.83	21.0	17,562

3. Construction Emissions Details

3.1. Site Preparation (2026) - 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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	3.74	3.14	29.2	28.8	0.05	1.24	—	1.24	1.14	—	1.14	—	5,298	5,298	0.21	0.04	—	5,316
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.21	0.17	1.60	1.58	< 0.005	0.07	—	0.07	0.06	—	0.06	—	290	290	0.01	< 0.005	—	291
Dust From Material Movement	—	—	—	—	—	—	1.08	1.08	—	0.55	0.55	—	—	—	—	—	—	—
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	0.04	0.03	0.29	0.29	< 0.005	0.01	—	0.01	0.01	—	0.01	—	48.1	48.1	< 0.005	< 0.005	—	48.2
Dust From Material Movement	—	—	—	—	—	—	0.20	0.20	—	0.10	0.10	—	—	—	—	—	—	—
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.06	0.73	0.00	0.00	0.18	0.18	0.00	0.04	0.04	—	173	173	< 0.005	0.01	0.02	175
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	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.73	9.73	< 0.005	< 0.005	0.02	9.86
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.61	1.61	< 0.005	< 0.005	< 0.005	1.63
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 (2026) - 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	3.62	3.04	27.2	27.6	0.06	1.12	—	1.12	1.03	—	1.03	—	6,599	6,599	0.27	0.05	—	6,621
Dust From Material Movement	—	—	—	—	—	—	9.20	9.20	—	3.65	3.65	—	—	—	—	—	—	—

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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.62	3.04	27.2	27.6	0.06	1.12	—	1.12	1.03	—	1.03	—	6,599	6,599	0.27	0.05	—	6,621	
Dust From Material Movement	—	—	—	—	—	—	9.20	9.20	—	3.65	3.65	—	—	—	—	—	—	—	—
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	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.40	0.33	2.98	3.02	0.01	0.12	—	0.12	0.11	—	0.11	—	723	723	0.03	0.01	—	726	
Dust From Material Movement	—	—	—	—	—	—	1.01	1.01	—	0.40	0.40	—	—	—	—	—	—	—	—
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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.07	0.06	0.54	0.55	< 0.005	0.02	—	0.02	0.02	—	0.02	—	120	120	< 0.005	< 0.005	—	120	
Dust From Material Movement	—	—	—	—	—	—	0.18	0.18	—	0.07	0.07	—	—	—	—	—	—	—	—
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	0.00

Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.08	0.05	1.13	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	223	223	< 0.005	0.01	0.80	226
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	0.07	0.07	0.07	0.83	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	198	198	< 0.005	0.01	0.02	200
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	0.01	0.01	0.01	0.09	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	22.2	22.2	< 0.005	< 0.005	0.04	22.5
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	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.68	3.68	< 0.005	< 0.005	0.01	3.73
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 (2026) - 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	1.28	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
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	1.28	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
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	0.56	0.47	4.30	5.66	0.01	0.17	—	0.17	0.15	—	0.15	—	1,046	1,046	0.04	0.01	—	1,050
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	0.10	0.09	0.78	1.03	< 0.005	0.03	—	0.03	0.03	—	0.03	—	173	173	0.01	< 0.005	—	174
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	0.78	0.70	0.45	9.92	0.00	0.00	1.78	1.78	0.00	0.42	0.42	—	1,959	1,959	0.03	0.07	7.00	1,986
Vendor	0.27	0.09	4.42	1.68	0.02	0.03	0.68	0.72	0.03	0.18	0.22	—	2,555	2,555	0.17	0.39	6.15	2,680
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	0.66	0.64	0.59	7.29	0.00	0.00	1.78	1.78	0.00	0.42	0.42	—	1,740	1,740	0.04	0.07	0.18	1,762
Vendor	0.26	0.09	4.73	1.72	0.02	0.04	0.68	0.72	0.04	0.18	0.22	—	2,554	2,554	0.17	0.38	0.16	2,673
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	0.28	0.28	0.23	3.25	0.00	0.00	0.76	0.76	0.00	0.18	0.18	—	779	779	0.02	0.03	1.32	790
Vendor	0.12	0.04	2.03	0.74	0.01	0.02	0.29	0.31	0.02	0.08	0.09	—	1,115	1,115	0.07	0.17	1.16	1,168
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	0.05	0.04	0.59	0.00	0.00	0.14	0.14	0.00	0.03	0.03	—	129	129	< 0.005	0.01	0.22	131
Vendor	0.02	0.01	0.37	0.14	< 0.005	< 0.005	0.05	0.06	< 0.005	0.01	0.02	—	185	185	0.01	0.03	0.19	193
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 (2027) - 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	1.23	1.03	9.39	12.9	0.02	0.34	—	0.34	0.31	—	0.31	—	2,397	2,397	0.10	0.02	—	2,405
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	1.23	1.03	9.39	12.9	0.02	0.34	—	0.34	0.31	—	0.31	—	2,397	2,397	0.10	0.02	—	2,405
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	0.81	0.68	6.19	8.53	0.02	0.22	—	0.22	0.20	—	0.20	—	1,581	1,581	0.06	0.01	—	1,586
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	0.15	0.12	1.13	1.56	< 0.005	0.04	—	0.04	0.04	—	0.04	—	262	262	0.01	< 0.005	—	263
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	0.69	0.68	0.45	9.34	0.00	0.00	1.78	1.78	0.00	0.42	0.42	—	1,924	1,924	0.03	0.07	6.36	1,951
Vendor	0.27	0.09	4.15	1.63	0.02	0.03	0.68	0.72	0.03	0.18	0.22	—	2,497	2,497	0.15	0.37	5.53	2,615
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	0.63	0.56	0.58	6.84	0.00	0.00	1.78	1.78	0.00	0.42	0.42	—	1,709	1,709	0.04	0.07	0.17	1,731
Vendor	0.26	0.09	4.43	1.66	0.02	0.04	0.68	0.72	0.04	0.18	0.22	—	2,496	2,496	0.15	0.37	0.14	2,609
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	0.41	0.37	0.34	4.62	0.00	0.00	1.15	1.15	0.00	0.27	0.27	—	1,156	1,156	0.02	0.04	1.81	1,172
Vendor	0.17	0.06	2.87	1.08	0.01	0.02	0.44	0.46	0.02	0.12	0.14	—	1,646	1,646	0.10	0.24	1.57	1,722
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	0.08	0.07	0.06	0.84	0.00	0.00	0.21	0.21	0.00	0.05	0.05	—	191	191	< 0.005	0.01	0.30	194
Vendor	0.03	0.01	0.52	0.20	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.03	—	273	273	0.02	0.04	0.26	285
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 (2027) - 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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.88	0.74	6.94	9.95	0.01	0.30	—	0.30	0.27	—	0.27	—	1,511	1,511	0.06	0.01	—	1,516
Paving	2.16	2.16	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.38	0.55	< 0.005	0.02	—	0.02	0.02	—	0.02	—	82.8	82.8	< 0.005	< 0.005	—	83.1
Paving	0.12	0.12	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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	0.07	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13.7	13.7	< 0.005	< 0.005	—	13.8
Paving	0.02	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.05	0.58	0.00	0.00	0.15	0.15	0.00	0.04	0.04	—	146	146	< 0.005	0.01	0.01	148
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	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	8.19	8.19	< 0.005	< 0.005	0.01	8.30
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	< 0.005	< 0.005	—	1.36	1.36	< 0.005	< 0.005	< 0.005	1.37
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. Paving (2028) - 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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.82	0.69	6.63	9.91	0.01	0.26	—	0.26	0.24	—	0.24	—	1,511	1,511	0.06	0.01	—	1,516
Paving	2.16	2.16	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.02	0.02	0.18	0.27	< 0.005	0.01	—	0.01	0.01	—	0.01	—	41.4	41.4	< 0.005	< 0.005	—	41.5
Paving	0.06	0.06	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	< 0.005	< 0.005	0.03	0.05	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	6.85	6.85	< 0.005	< 0.005	—	6.88
Paving	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.04	0.55	0.00	0.00	0.15	0.15	0.00	0.04	0.04	—	143	143	< 0.005	0.01	0.01	145
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	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.01	4.01	< 0.005	< 0.005	0.01	4.06
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	< 0.005	< 0.005	—	0.66	0.66	< 0.005	< 0.005	< 0.005	0.67
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 (2028) - 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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipm ent	0.13	0.11	0.81	1.12	< 0.005	0.02	—	0.02	0.01	—	0.01	—	134	134	0.01	< 0.005	—	134
Architect ural Coating s	137	137	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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 Equipm ent	0.01	0.01	0.07	0.09	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11.0	11.0	< 0.005	< 0.005	—	11.0
Architect ural Coating s	11.3	11.3	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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 Equipm ent	< 0.005	< 0.005	0.01	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.82	1.82	< 0.005	< 0.005	—	1.82
Architect ural Coating s	2.06	2.06	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.12	0.11	0.10	1.29	0.00	0.00	0.36	0.36	0.00	0.08	0.08	—	335	335	0.01	0.01	0.03	339
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	0.01	0.01	0.01	0.11	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	28.2	28.2	< 0.005	< 0.005	0.04	28.6
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	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	4.67	4.67	< 0.005	< 0.005	0.01	4.74
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Regional Shopping Center	79.6	74.6	50.1	505	1.08	0.75	93.5	94.2	0.70	23.7	24.4	—	110,106	110,106	5.33	4.85	311	111,994

Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	79.6	74.6	50.1	505	1.08	0.75	93.5	94.2	0.70	23.7	24.4	—	110,106	110,106	5.33	4.85	311	111,994
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Regional Shopping Center	71.9	66.5	58.6	452	0.98	0.75	93.5	94.2	0.71	23.7	24.4	—	100,721	100,721	6.23	5.32	8.07	102,470
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	71.9	66.5	58.6	452	0.98	0.75	93.5	94.2	0.71	23.7	24.4	—	100,721	100,721	6.23	5.32	8.07	102,470
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Regional Shopping Center	12.9	12.0	9.47	75.3	0.17	0.13	15.4	15.5	0.12	3.91	4.03	—	15,750	15,750	0.92	0.79	20.6	16,030
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	12.9	12.0	9.47	75.3	0.17	0.13	15.4	15.5	0.12	3.91	4.03	—	15,750	15,750	0.92	0.79	20.6	16,030

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Regional Shopping Center	—	—	—	—	—	—	—	—	—	—	—	—	5,288	5,288	0.18	0.02	—	5,299
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	970	970	0.03	< 0.005	—	972
Total	—	—	—	—	—	—	—	—	—	—	—	—	6,257	6,257	0.22	0.03	—	6,271
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Regional Shopping Center	—	—	—	—	—	—	—	—	—	—	—	—	5,288	5,288	0.18	0.02	—	5,299
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	970	970	0.03	< 0.005	—	972
Total	—	—	—	—	—	—	—	—	—	—	—	—	6,257	6,257	0.22	0.03	—	6,271
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Regional Shopping Center	—	—	—	—	—	—	—	—	—	—	—	—	875	875	0.03	< 0.005	—	877
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	161	161	0.01	< 0.005	—	161
Total	—	—	—	—	—	—	—	—	—	—	—	—	1,036	1,036	0.04	< 0.005	—	1,038

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Regional Shopping Center	0.14	0.07	1.30	1.09	0.01	0.10	—	0.10	0.10	—	0.10	—	1,552	1,552	0.14	< 0.005	—	1,556
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.14	0.07	1.30	1.09	0.01	0.10	—	0.10	0.10	—	0.10	—	1,552	1,552	0.14	< 0.005	—	1,556
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Regional Shopping Center	0.14	0.07	1.30	1.09	0.01	0.10	—	0.10	0.10	—	0.10	—	1,552	1,552	0.14	< 0.005	—	1,556
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.14	0.07	1.30	1.09	0.01	0.10	—	0.10	0.10	—	0.10	—	1,552	1,552	0.14	< 0.005	—	1,556
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Regional Shopping Center	0.03	0.01	0.24	0.20	< 0.005	0.02	—	0.02	0.02	—	0.02	—	257	257	0.02	< 0.005	—	258
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.03	0.01	0.24	0.20	< 0.005	0.02	—	0.02	0.02	—	0.02	—	257	257	0.02	< 0.005	—	258

4.3. Area Emissions by Source

4.3.1. 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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Consum Products	11.9	11.9	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architect ural Coating s	1.13	1.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landsca pe Equipm ent	4.26	3.93	0.20	23.9	< 0.005	0.04	—	0.04	0.03	—	0.03	—	98.4	98.4	< 0.005	< 0.005	—	98.7
Total	17.2	16.9	0.20	23.9	< 0.005	0.04	—	0.04	0.03	—	0.03	—	98.4	98.4	< 0.005	< 0.005	—	98.7
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consum er Product s	11.9	11.9	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architect ural Coating s	1.13	1.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	13.0	13.0	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consum er Product s	2.16	2.16	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architect ural Coating s	0.21	0.21	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landsca pe Equipm ent	0.53	0.49	0.03	2.99	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	11.2	11.2	< 0.005	< 0.005	—	11.2
Total	2.90	2.86	0.03	2.99	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	11.2	11.2	< 0.005	< 0.005	—	11.2

4.4. Water Emissions by Land Use

4.4.1. 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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Regional Shopping Center	—	—	—	—	—	—	—	—	—	—	—	87.1	113	200	0.30	0.19	—	265
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	87.1	113	200	0.30	0.19	—	265
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Regional Shopping Center	—	—	—	—	—	—	—	—	—	—	—	87.1	113	200	0.30	0.19	—	265
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	87.1	113	200	0.30	0.19	—	265
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Regional Shopping Center	—	—	—	—	—	—	—	—	—	—	—	14.4	18.7	33.1	0.05	0.03	—	43.8
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00

Total	—	—	—	—	—	—	—	—	—	—	—	14.4	18.7	33.1	0.05	0.03	—	43.8
-------	---	---	---	---	---	---	---	---	---	---	---	------	------	------	------	------	---	------

4.5. Waste Emissions by Land Use

4.5.1. 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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Regional Shopping Center	—	—	—	—	—	—	—	—	—	—	—	311	0.00	311	31.1	0.00	—	1,089
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	311	0.00	311	31.1	0.00	—	1,089
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Regional Shopping Center	—	—	—	—	—	—	—	—	—	—	—	311	0.00	311	31.1	0.00	—	1,089
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	311	0.00	311	31.1	0.00	—	1,089
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Regional Shopping Center	—	—	—	—	—	—	—	—	—	—	—	51.5	0.00	51.5	5.15	0.00	—	180
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	51.5	0.00	51.5	5.15	0.00	—	180

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Regional Shopping Center	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.64	2.64
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.64	2.64
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Regional Shopping Center	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.64	2.64
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.64	2.64
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Regional	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.44	0.44
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.44	0.44

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)

Equipm ent 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)

Vegetati on	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	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	3/2/2026	3/27/2026	5.00	20.0	—
Grading	Grading	3/28/2026	5/22/2026	5.00	40.0	—
Building Construction	Building Construction	5/23/2026	12/3/2027	5.00	400	—
Paving	Paving	12/4/2027	1/14/2028	5.00	30.0	—
Architectural Coating	Architectural Coating	1/15/2028	2/25/2028	5.00	30.0	—

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/Back hoes	Diesel	Average	4.00	8.00	84.0	0.37
Grading	Excavators	Diesel	Average	2.00	8.00	36.0	0.38
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Scrapers	Diesel	Average	2.00	8.00	423	0.48
Grading	Tractors/Loaders/Back hoes	Diesel	Average	2.00	8.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29
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	Tractors/Loaders/Back hoes	Diesel	Average	3.00	7.00	84.0	0.37
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45

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	20.0	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	176	14.3	LDA,LDT1,LDT2
Building Construction	Vendor	90.1	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	35.2	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	0.00	0.00	825,000	275,000	64,687

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	—	—	30.0	0.00	—
Grading	—	—	120	0.00	—
Paving	0.00	0.00	0.00	0.00	24.7

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
Regional Shopping Center	0.00	0%
Parking Lot	24.7	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2028	0.00	375	0.01	< 0.005
2026	0.00	375	0.01	< 0.005
2027	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	VM/Weekday	VM/Saturday	VM/Sunday	VM/Year
Regional Shopping Center	20,361	20,361	20,361	7,431,765	117,809	131,827	131,827	44,462,083
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

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)
0	0.00	825,000	275,000	64,687

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)
Regional Shopping Center	5,148,724	375	0.0129	0.0017	4,842,678
Parking Lot	944,424	375	0.0129	0.0017	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Regional Shopping Center	40,739,887	0.00
Parking Lot	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Regional Shopping Center	578	—
Parking Lot	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
Regional Shopping Center	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Regional Shopping Center	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	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
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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
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5.16.2. Process Boilers

Equipment Type					
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5.17. User Defined

Equipment Type	Fuel Type
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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
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5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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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	19.8	annual days of extreme heat
Extreme Precipitation	5.00	annual days with precipitation above 20 mm
Sea Level Rise	—	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 $\frac{3}{4}$ 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 (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters. 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	1	0	0	N/A
Extreme Precipitation	2	0	0	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	1	0	0	N/A
Flooding	0	0	0	N/A
Drought	0	0	0	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	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	1	1	1	2
Extreme Precipitation	2	1	1	3
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	1	1	1	2
Flooding	1	1	1	2
Drought	1	1	1	2

Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

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	45.1
AQ-PM	37.5
AQ-DPM	24.8
Drinking Water	69.9
Lead Risk Housing	5.61
Pesticides	76.5
Toxic Releases	13.1
Traffic	58.7
Effect Indicators	—
CleanUp Sites	61.8
Groundwater	82.1
Haz Waste Facilities/Generators	67.6
Impaired Water Bodies	94.6
Solid Waste	64.4

Sensitive Population	—
Asthma	24.7
Cardio-vascular	32.0
Low Birth Weights	77.8
Socioeconomic Factor Indicators	—
Education	41.6
Housing	42.8
Linguistic	26.4
Poverty	13.0
Unemployment	7.77

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	60.34903118
Employed	0.526113178
Median HI	67.31682279
Education	—
Bachelor's or higher	51.50776338
High school enrollment	19.24804312
Preschool enrollment	95.7141024
Transportation	—
Auto Access	43.30809701
Active commuting	34.8646221
Social	—
2-parent households	66.67522135
Voting	91.95431798

Neighborhood	—
Alcohol availability	90.56845887
Park access	6.351854228
Retail density	9.162068523
Supermarket access	36.13499294
Tree canopy	25.22776851
Housing	—
Homeownership	70.21686129
Housing habitability	88.97728731
Low-inc homeowner severe housing cost burden	91.58218914
Low-inc renter severe housing cost burden	88.6179905
Uncrowded housing	66.9190299
Health Outcomes	—
Insured adults	87.86090081
Arthritis	1.2
Asthma ER Admissions	53.9
High Blood Pressure	2.1
Cancer (excluding skin)	2.7
Asthma	27.9
Coronary Heart Disease	1.9
Chronic Obstructive Pulmonary Disease	3.4
Diagnosed Diabetes	9.5
Life Expectancy at Birth	46.3
Cognitively Disabled	15.9
Physically Disabled	30.9
Heart Attack ER Admissions	39.1
Mental Health Not Good	51.7
Chronic Kidney Disease	2.1

Obesity	51.8
Pedestrian Injuries	70.7
Physical Health Not Good	28.2
Stroke	4.4
Health Risk Behaviors	—
Binge Drinking	97.9
Current Smoker	42.3
No Leisure Time for Physical Activity	36.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	59.5
Elderly	20.5
English Speaking	77.7
Foreign-born	42.9
Outdoor Workers	43.1
Climate Change Adaptive Capacity	—
Impervious Surface Cover	94.8
Traffic Density	44.7
Traffic Access	23.0
Other Indices	—
Hardship	53.0
Other Decision Support	—
2016 Voting	77.2

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	46.0

Healthy Places Index Score for Project Location (b)	46.0
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 & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Construction: Construction Phases	Construction duration conservatively assumed to be 24 months. No demolition necessary.
Operations: Vehicle Data	See Traffic Study: 20,356 daily trips assumed.
Operations: Water and Waste Water	See Project Description.

Appendix E

Biological Resources
Information

Appendix E-1

Biological Resources Database Searches



Selected Elements by Scientific Name

California Department of Fish and Wildlife

California Natural Diversity Database



Query Criteria: Quad (Elk Grove (3812143)) OR Galt (3812133))

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
<i>Accipiter cooperii</i> Cooper's hawk	ABNKC12040	None	None	G5	S4	WL
<i>Actinemys marmorata</i> northwestern pond turtle	ARAAD02031	Proposed Threatened	None	G2	SNR	SSC
<i>Agelaius tricolor</i> tricolored blackbird	ABPBXB0020	None	Threatened	G1G2	S2	SSC
<i>Ambystoma californiense pop. 1</i> California tiger salamander - central California DPS	AAAAA01181	Threatened	Threatened	G2G3T3	S3	WL
<i>Ardea alba</i> great egret	ABNGA04040	None	None	G5	S4	
<i>Ardea herodias</i> great blue heron	ABNGA04010	None	None	G5	S4	
<i>Athene cunicularia</i> burrowing owl	ABNSB10010	None	Candidate Endangered	G4	S2	SSC
<i>Bombus pensylvanicus</i> American bumble bee	IIHYM24260	None	None	G3G4	S2	
<i>Branchinecta lynchi</i> vernal pool fairy shrimp	ICBRA03030	Threatened	None	G3	S3	
<i>Branchinecta mesovallensis</i> midvalley fairy shrimp	ICBRA03150	None	None	G2	S2S3	
<i>Buteo swainsoni</i> Swainson's hawk	ABNKC19070	None	Threatened	G5	S4	
<i>Desmocerus californicus dimorphus</i> valley elderberry longhorn beetle	IICOL48011	Threatened	None	G3T3	S3	
<i>Downingia pusilla</i> dwarf downingia	PDCAM060C0	None	None	GU	S2	2B.2
<i>Elanus leucurus</i> white-tailed kite	ABNKC06010	None	None	G5	S3S4	FP
<i>Gratiola heterosepala</i> Boggs Lake hedge-hyssop	PDSCR0R060	None	Endangered	G2	S2	1B.2
Great Valley Valley Oak Riparian Forest Great Valley Valley Oak Riparian Forest	CTT61430CA	None	None	G1	S1.1	
<i>Legenere limosa</i> legenere	PDCAM0C010	None	None	G2	S2	1B.1
<i>Lepidurus packardii</i> vernal pool tadpole shrimp	ICBRA10010	Endangered	None	G3	S3	
<i>Linderiella occidentalis</i> California linderiella	ICBRA06010	None	None	G2G3	S2S3	
Northern Hardpan Vernal Pool Northern Hardpan Vernal Pool	CTT44110CA	None	None	G3	S3.1	



Selected Elements by Scientific Name
California Department of Fish and Wildlife
California Natural Diversity Database



Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
<i>Nycticorax nycticorax</i> black-crowned night heron	ABNGA11010	None	None	G5	S4	
<i>Oncorhynchus mykiss irideus pop. 11</i> steelhead - Central Valley DPS	AFCHA0209K	Threatened	None	G5T2Q	S2	SSC
<i>Orcuttia tenuis</i> slender Orcutt grass	PMPOA4G050	Threatened	Endangered	G2	S2	1B.1
<i>Orcuttia viscida</i> Sacramento Orcutt grass	PMPOA4G070	Endangered	Endangered	G1	S1	1B.1
<i>Sagittaria sanfordii</i> Sanford's arrowhead	PMALI040Q0	None	None	G3	S3	1B.2
<i>Thamnophis gigas</i> giant gartersnake	ARADB36150	Threatened	Threatened	G2	S2	
Valley Oak Woodland Valley Oak Woodland	CTT71130CA	None	None	G3	S2.1	

Record Count: 27



CNPS Rare Plant Inventory

Search Results

8 matches found. Click on scientific name for details

Search Criteria: , CRPR is one of [1A:1B:2A:2B:3:4:CBR:PPD] , Fed List is one of [FE:FT:FC:FD:None] or State List is one of [CE:CT:CR:CC:CD:None] , Quad is one of [3812143:3812133]

▲ SCIENTIFIC NAME	COMMON NAME	BLOOMING PERIOD	FED LIST	STATE LIST	CA RARE PLANT RANK	GENERAL HABITATS	MICROHABITATS	LOWEST ELEVATION (FT)	HIGHEST ELEVATION (FT)
Downingia pusilla	dwarf downingia	Mar-May	None	None	2B.2	Valley and foothill grassland (mesic), Vernal pools		5	1460
Gratiola heterosepala	Boggs Lake hedge-hyssop	Apr-Aug	None	CE	1B.2	Marshes and swamps (lake margins), Vernal pools	Clay	35	7790
Hesperevax caulescens	hogwallow starfish	Mar-Jun	None	None	4.2	Valley and foothill grassland (mesic clay), Vernal pools (shallow)	Alkaline (sometimes)	0	1655
Legenere limosa	legenere	Apr-Jun	None	None	1B.1	Vernal pools		5	2885
Navarretia eriocephala	hoary navarretia	May-Jun	None	None	4.3	Cismontane woodland, Valley and foothill grassland	Vernally Mesic	345	1310

<i>Orcuttia tenuis</i>	slender Orcutt grass	May-Sep(Oct)	FT	CE	1B.1	Vernal pools	Gravelly (often)	115	5775
<i>Orcuttia viscida</i>	Sacramento Orcutt grass	Apr-Jul(Sep)	FE	CE	1B.1	Vernal pools		100	330
<i>Sagittaria sanfordii</i>	Sanford's arrowhead	May-Oct(Nov)	None	None	1B.2	Marshes and swamps (shallow freshwater)		0	2135

Showing 1 to 8 of 8 entries

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Suggested Citation:
California Native Plant Society, Rare Plant Program. 2025. Rare Plant Inventory (online edition, v9.5.1). Website <https://www.rareplants.cnps.org> [accessed 13 July 2025].

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United States Department of the Interior

FISH AND WILDLIFE SERVICE

Sacramento Fish And Wildlife Office

Federal Building

2800 Cottage Way, Room W-2605

Sacramento, CA 95825-1846

Phone: (916) 414-6600 Fax: (916) 414-6713



In Reply Refer To:

07/09/2025 03:34:20 UTC

Project Code: 2025-0119233

Project Name: Lent Ranch 1

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2))

(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf>

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts, see <https://www.fws.gov/program/migratory-bird-permit/what-we-do>.

It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures, see <https://www.fws.gov/library/collections/threats-birds>.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit <https://www.fws.gov/partner/council-conservation-migratory-birds>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Sacramento Fish And Wildlife Office

Federal Building

2800 Cottage Way, Room W-2605

Sacramento, CA 95825-1846

(916) 414-6600

PROJECT SUMMARY

Project Code: 2025-0119233
Project Name: Lent Ranch 1
Project Type: Commercial Development
Project Description: Lent ranch southwest portion
Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@38.37611185,-121.37271882029009,14z>



Counties: Sacramento County, California

ENDANGERED SPECIES ACT SPECIES

There is a total of 10 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

REPTILES

NAME	STATUS
Giant Garter Snake <i>Thamnophis gigas</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4482	Threatened
Northwestern Pond Turtle <i>Actinemys marmorata</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/1111	Proposed Threatened

AMPHIBIANS

NAME	STATUS
Western Spadefoot <i>Spea hammondi</i> Population: Northern DPS No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/5425	Proposed Threatened

INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> There is proposed critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	Proposed Threatened
Valley Elderberry Longhorn Beetle <i>Desmocerus californicus dimorphus</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/7850	Threatened

CRUSTACEANS

NAME	STATUS
Vernal Pool Fairy Shrimp <i>Branchinecta lynchi</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/498	Threatened
Vernal Pool Tadpole Shrimp <i>Lepidurus packardii</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/2246	Endangered

FLOWERING PLANTS

NAME	STATUS
Fleshy Owl's-clover <i>Castilleja campestris ssp. succulenta</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/8095	Threatened

NAME	STATUS
Sacramento Orcutt Grass <i>Orcuttia viscida</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/5507	Endangered
Slender Orcutt Grass <i>Orcuttia tenuis</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/1063	Threatened

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

IPAC USER CONTACT INFORMATION

Agency: Private Entity
Name: Kimberlina Gomez
Address: 5170 Golden Foothill Pkwy
City: El Dorado Hills
State: CA
Zip: 95762
Email: kgomez@acorn-env.com
Phone: 9162358224



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Sacramento Fish And Wildlife Office

Federal Building

2800 Cottage Way, Room W-2605

Sacramento, CA 95825-1846

Phone: (916) 414-6600 Fax: (916) 414-6713



In Reply Refer To:

07/09/2025 03:36:33 UTC

Project Code: 2025-0119234

Project Name: Lent Ranch 2

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)).

(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf>

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts, see <https://www.fws.gov/program/migratory-bird-permit/what-we-do>.

It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures, see <https://www.fws.gov/library/collections/threats-birds>.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit <https://www.fws.gov/partner/council-conservation-migratory-birds>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Sacramento Fish And Wildlife Office

Federal Building

2800 Cottage Way, Room W-2605

Sacramento, CA 95825-1846

(916) 414-6600

PROJECT SUMMARY

Project Code: 2025-0119234

Project Name: Lent Ranch 2

Project Type: Commercial Development

Project Description: Northeast portions

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@38.38288035,-121.37071830685855,14z>



Counties: Sacramento County, California

ENDANGERED SPECIES ACT SPECIES

There is a total of 9 threatened, endangered, or candidate species on this species list.

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NAME	STATUS
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FLOWERING PLANTS

NAME	STATUS
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NAME	STATUS
Slender Orcutt Grass <i>Orcuttia tenuis</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/1063	Threatened

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

IPAC USER CONTACT INFORMATION

Agency: Private Entity
Name: Kimberlina Gomez
Address: 5170 Golden Foothill Pkwy
City: El Dorado Hills
State: CA
Zip: 95762
Email: kgomez@acorn-env.com
Phone: 9162358224



U.S. Fish and Wildlife Service

National Wetlands Inventory

Lent Ranch



U.S. Fish and Wildlife Service, National Standards and Support Team,
wetlands_team@fws.gov

July 9, 2025

Wetlands

	Estuarine and Marine Deepwater		Freshwater Emergent Wetland		Lake
	Estuarine and Marine Wetland		Freshwater Forested/Shrub Wetland		Other
			Freshwater Pond		Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

Critical Habitat for Threatened & Endangered Species [USFWS]



8/13/2025

 Final Polygon Features

World Imagery

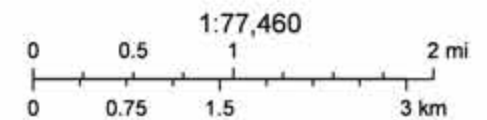
Low Resolution 15m Imagery

High Resolution 60cm Imagery

High Resolution 30cm Imagery

Citations

19m Resolution Metadata



Earthstar Geographics, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community

Appendix E-2

List of Species Observed

WILDLIFE	
Scientific name	Common name
<i>Calypte anna</i>	Anna's hummingbird
<i>Charadrius vociferus</i>	Killdeer
<i>Columba livia</i>	Rock dove
<i>Corvus brachyrhynchos</i>	Crow
<i>Buteo jamaicensis</i>	Red-tailed hawk
<i>Buteo swainsoni</i>	Swainson's hawk
<i>Lanius ludovicianus</i>	Loggerhead shrike
<i>Spinus psaltria</i>	Lesser gold finch
<i>Charadrius vociferus</i>	Killdeer
<i>Felis catus</i>	Feral cat
<i>Elanus leucurus</i>	white-tailed kite
<i>Cathartes aura</i>	Turkey vulture
<i>Anser spp. / Branta spp.</i>	Geese
PLANTS	
Scientific name	Common name
<i>Brassica sp.</i>	Mustard
<i>Bromus tectorum</i>	Cheatgrass
<i>Carduus pycnocephalus</i>	Italian thistle
<i>Centaurea calcitrapa</i>	Star thistle
<i>Cichorium intybus</i>	Chicory
<i>Epilobium brachycarpum</i>	Tall annual willow herb
<i>Erigeron bonariensis</i>	Flax leaf fleabane
<i>Helminthotheca echioides</i>	Bristly oxtongue
<i>Lactuca serriola</i>	Prickly lettuce
<i>Leontodon</i>	Hawkbit
<i>Leymus triticoides</i>	Beardless wild rye
<i>Malvella leprosa</i>	Alkali mallow
<i>Pyrus calleryana</i>	Bradford pear
<i>Schinus sp.</i>	Brazilian peppertree
<i>Tragopon dubius</i>	Yellow salsify
<i>Triticum aestivum</i>	Wheat
<i>Vulpia myuros</i>	Rat tail fescue
<i>Agropyron cristatum</i>	Crested wheatgrass
<i>Agrostis scabra</i>	Bentgrass
<i>Avena spp.</i>	Wild oat
<i>Baccharis pilularis</i>	Coyote brush
<i>Bromus hordeaceus</i>	Soft brome
<i>Convolvulus arvensis</i>	Field bindweed
<i>Croton setigerus</i>	Doveweed
<i>Cuscuta pentagona</i>	Fiveangled dodder
<i>Cyperus eragrostis</i>	Tall flatsedge
<i>Dittrichia graveolens</i>	Stinkwort
<i>Eleocharis palustris</i>	Common spikerush
<i>Elymus sp.</i>	Wild rye

<i>Epilobium canum</i>	California fuchsia
<i>Eryngium sp.</i>	Coyote thistle
<i>Glebionis coronaria</i>	Crown daisy
<i>Holocarpha virgata</i>	Tarweed
<i>Hordeum murinum</i>	Mouse barley
<i>Juncus bufonius</i>	Toad rush
<i>Juncus xiphioides</i>	Iris leaf rush
<i>Lepidium latifolium</i>	Pepperweed
<i>Lolium perenne</i>	Perennial ryegrass
<i>Lotus corniculatus</i>	Bird's foot trefoil
<i>Polypogon monspeliensis</i>	Annual rabbitsfoot grass
<i>Psilocarphus brevissimus</i>	Dwarf woolyheads
<i>Rumex crispus</i>	Curly dock
<i>Trifolium campestre</i>	Hop trefoil
<i>Trifolium fragiferum</i>	Strawberry clover
<i>Trifolium hirtum</i>	Rose clover

Appendix E-3
Site Photos



View of the northernmost parcel facing the Sky River Casino to the south.



View of the central parcel facing west showing the row crop agriculture throughout the Action Area.



View of the northernmost parcel facing west, showing the row crop agriculture throughout the Action Area.



View of the central parcel facing west showing the row crop agriculture throughout the Action Area.



View of a vernal pool feature within the central most parcel showing hydrologic and vegetation features.



View of Marsh habitat in central parcel showing vegetation and hydrologic features.



View of a vernal pool feature within the central most parcel showing hydrologic and vegetation features.



View of the southernmost parcel showing the row crop agriculture throughout the Action Area.



View of the southernmost parcel showing the row crop agriculture throughout the Action Area.

Appendix E-4

Historic Aerials



Source: Google Earth

Imagery Date: 5/22/1993



Source: Google Earth

Imagery Date: 5/31/2007



Source: Google Earth

Imagery Date: 7/14/2008



Source: Google Earth

Imagery Date: 1/6/2024



Source: Google Earth

Imagery Date: 6/7/2025

Appendix F

Cultural Resource
Assessment (Confidential)



United States Department of the Interior

BUREAU OF INDIAN AFFAIRS
Pacific Regional Office
2800 Cottage Way, Room W-2820
Sacramento, CA 95825

IN REPLY REFER TO:
4303-P5 Wilton 9 Parcels FTT_SHPO

Ms. Julianne Polanco
State Historic Preservation Officer
Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento, CA 95816

Dear Ms. Polanco,

The Bureau of Indian Affairs (BIA), Pacific Regional Office, is proposing to approve the conveyance of approximately 90.57 acres of land from fee simple to federal trust status for the Wilton Rancheria (Tribe) in Elk Grove, Sacramento County, California. The purpose of this action is to bring nine parcels into Federal trust status. The Tribe does not have immediate plans to develop the parcels but anticipates that mixed use commercial development is reasonably foreseeable in the future (undertaking). Because this proposed undertaking has the potential to affect historic properties, its implementation, pursuant to 25 CFR 151 (Land Acquisitions) is contingent in part on the BIA meeting its obligations under Section 106 of the National Historic Preservation Act (NHPA), as amended.

The Area of Potential Effect (APE) includes nine parcels west of California State Route 99 in Elk Grove, Sacramento County, California. The undertaking is located in Section 18 of Township 6 North, Range 6 East, Mount Diablo Meridian (Enclosure 1). The APE consists of Assessor Parcel Numbers (APNs) 134-1030-007-0000, 134-1030-008, 134-1030-006-0000, 134-1030-005-0000, 134-1030-004-0000, 134-1030-009-0000, 134-1010-004-0000, 134-1010-003-0000, and 134-1010-002-0000. The parcels are currently undeveloped and used for hay production but were previously graded for a development project that was not completed.

The Wilton Rancheria Department of Cultural Preservation conducted a records search and pedestrian survey in January 2026 for the proposed undertaking. The report of that study supports this consultation. The Built Environment Resource Directory was separately consulted.

The records search found that twelve cultural resources studies have previously been completed within ½ mile of the APE. Two studies were previously conducted within the APE, including a 1998 Cultural Resource Assessment for a development plan (Peak & Associates 1998). Three historic-era cultural resources were previously identified within ½ mile of the APE. A historical marker commemorating actions related to the Bear Flag Revolt is located approximately 0.43

mile southeast of the APE. One isolated basalt flake was identified during the pedestrian survey. No other cultural resources were identified within the APE. An isolated find is not eligible for the National Register of Historic Places (National Register). The Lent Ranch is approximately ¼ mile east of the southern portion of the APE. The Lent Ranch was previously determined not eligible for the National Register in a Section 106 consultation by a different federal agency.

Based on the assessment above, the BIA has reached a finding of **No Historic Properties Affected** concerning this Federal undertaking. Your agreement with our definition of the Project APE, eligibility determinations and finding of effects shall suffice as evidence that the BIA has met its Section 106 compliance obligations in this matter pursuant to 36 CFR 800.4(d)(1). If you require additional information, please contact Regional Archeologists, Julie Taomia at (916) 413-5628.

Sincerely,

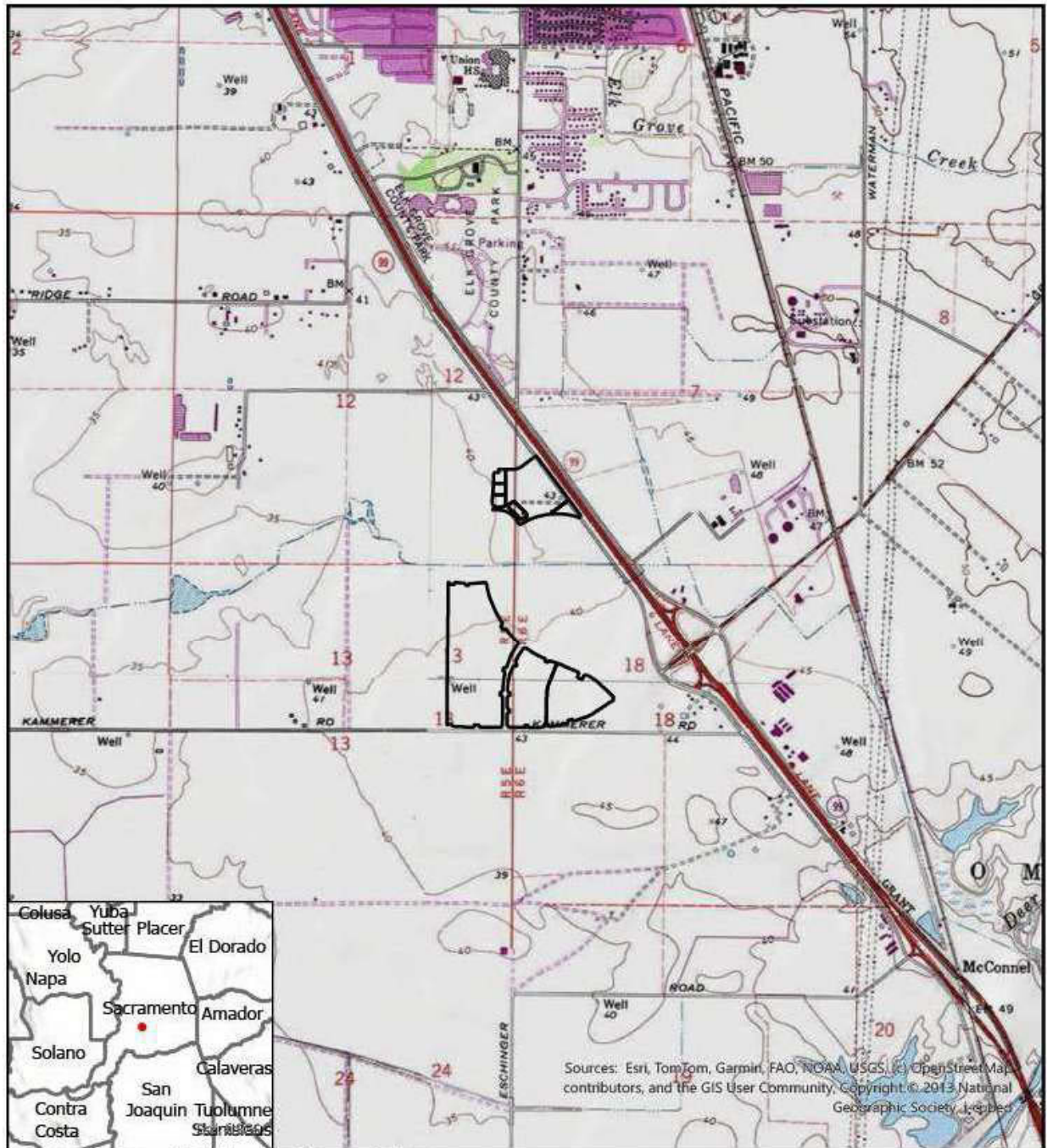
RYAN
HUNTER

Digitally signed by RYAN
HUNTER
Date: 2026.03.03
15:28:36 -08'00'

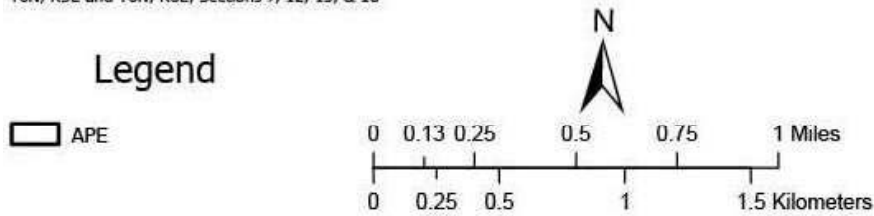
Acting Regional Director

Enclosures

Cc: Jesus Tarango, Jr., Chairman
Steven Hutchason, Tribal Historic Preservation Officer



USGS 7.5 Minute Topographic Quadrangles: Elk Grove and Galt, CA
T6N, R5E and T6N, R6E, Sections 7, 12, 13, & 18



Appendix G: Trip Generation Memorandum

Memorandum

From: Pedro Cortes
Curtis Yee, P.E.

Re: *Trip Generation Memorandum*

Date: August 22, 2025

The purpose of this memorandum is to document the trip generation for the currently proposed project relative to prior development assumptions for the same parcels.

Project Description

Kimley-Horn understands that the Wilton Rancheria (the “Tribe”) desires to assess the potential development of parcels adjacent to the existing Sky River Casino in Elk Grove. The Tribe envisions uses that are consistent with the Lent Ranch Specific Plan while also compatible with the Tribe’s nearby Sky River Casino. The northernmost parcels (approximately 17.5-acres) are estimated to contain 150,000-sf of building space. The southernmost parcels (approximately 73-acres) are estimated to contain up to 400,000-sf of building space. The remainder of the parcels’ acreage would be used for parking, circulation, and landscaping. An aerial of the relevant parcels is included in **Attachment A**.

Assessment of Proposed Project

The number of trips anticipated to be generated by the proposed project was approximated using data included in the *Trip Generation Manual, 11th Edition*, published by the Institute of Transportation Engineers (ITE). ITE Land Use Code 820 (Shopping Center (>150k)) was used to represent the project’s proposed development. The trips generated by the Lent Ranch Specific Plan and City of Elk Grove Travel Demand Model (TDM) for the relevant parcels and the 2025 proposed project are presented in **Table 1**.

Proposed project trips were compared to the assumptions made in the Lent Ranch Specific Plan for the specific parcels, as well as the City’s TDM. The TDM inputs include the number of households and number of employees. The industry standard conversion rate of 2 employees per 1,000-sf (using ITE’s average rates) was used for the TDM trip generation.

As shown in **Table 1**, the 2025 proposed project is anticipated to generate 20,356 Daily trips, 462 AM peak-hour trips, and 1,870 PM peak-hour trips. That represents 3,924 fewer Daily trips, 24 fewer AM peak-hour trips, and 497 fewer PM peak-hour trips relative to what was previously assumed in the Lent Ranch Specific Plan and 11,588 fewer Daily trips, 449 fewer AM peak-hour trips, and 982 fewer PM peak-hour trips relative to what was previously assumed in the TDM. As such, the proposed project is found to be a less intense traffic generator than the previous assumptions made by the City.

Attachment

Attachment A – Lent Ranch Parcels Aerial

Table 1 – Project Trip Generation Comparison

Land Use (ITE Code)	Qty	Units	Daily Trips	Weekday AM Peak-Hour					Weekday PM Peak-Hour				
				Total Trips	In		Out		Total Trips	In		Out	
					%	Trips	%	Trips		%	Trips	%	Trips
Lent Ranch Specific Plan EIR, October 2000													
Shopping Center ¹ - (820)	1,214	KSF	24,280	486	62%	301	38%	185	2,367	48%	1,136	52%	1,231
Total Trips:			24,280	486		301		185	2,367		1,136		1,231
City of Elk Grove Travel Demand Model (TDM)													
Shopping Center ² - (820)	726*	KSF	26,869	610	62%	378	38%	232	2,468	48%	1,185	52%	1,283
Multifamily Housing ² - (220)	753*	DU	5,075	301	24%	72	76%	229	384	63%	242	37%	142
Total Trips:			31,944	911		450		461	2,852		1,427		1,425
2025 Proposed Project													
Shopping Center ² - (820)	550	KSF	20,356	462	62%	286	38%	176	1,870	48%	898	52%	972
Total Trips:			20,356	462		286		176	1,870		898		972
Net Difference (2025 Proposed Project vs Lent Ranch Specific Plan EIR)			-3,924	-24		-15		-9	-497		-238		-259
			-18%	-5%		-5%		-5%	-23%		-23%		-24%
Net Difference (2025 Proposed Project vs City of Elk Grove TDM)			-11,588	-449		-164		-285	-982		-529		-453
			-44%	-65%		-45%		-89%	-42%		-46%		-38%

KSF = 1,000 SF GFA, DU = Dwelling Units

¹ ITE Trip Generation Manual, 6th Edition

² ITE Trip Generation Manual, 11th Edition

*City of Elk Grove TDM Land Use Assumptions



SOURCE: ESRI, 2025; City of Elk Grove GIS, 2024; Google Earth Aerial Photograph, 3/17/2024; Acorn Environmental, 4/2/2025

Appendix H

Phase I Environmental Site
Assessment

PHASE I ENVIRONMENTAL SITE ASSESSMENT REPORT

129-Acre Elk Grove Property, City of Elk
Grove, Sacramento County, California



Prepared for: Wilton Rancheria

July 10, 2023



Executive Summary

This Phase I Environmental Site Assessment (Phase I ESA) has been prepared by Acorn Environmental in conformance with the scope and limitations of the American Society for Testing and Materials (ASTM) Standard Practice E 1527-21 and E 2247-16 for an approximately 129-acre property (Subject Property) located in Elk Grove, Sacramento County, California (identified as Sacramento County Assessor's Parcel Numbers (APNs) 134-1030-001, 134-1030-002, 134-1030-004, 134-1030-005, 134-1030-006, 134-1030-007, 134-1030-008, 134-1030-009, 134-1010-013, 134-1010-008, 134-1010-005, 134-1010-004, 134-1010-003, 134-1010-002). The Subject Property is currently owned by M/H Realty Partners Affiliated Fund III LP. The Subject Property is shown relative to surrounding physical features in **Figures 1, 2, and 3**.

The Subject Property is currently undeveloped open space, a portion of which is actively used for grain agriculture. Owner/User-Provided information and historical physical setting resources reviewed indicated the Subject Property was historically used for agricultural purposes. A portion of the Subject Property, APN 134-1030-008, previously contained a single residential unit and airstrip. Expansion of urban growth into the vicinity of the Subject Property began with the implementation of the City of Elk Grove Lent Ranch Marketplace Special Planning Area in 2001 (City of Elk Grove, 2001). Adjacent parcels have been developed with various non-agricultural uses however the Subject Property remains undeveloped.

No environmental liens or active use limitations (AULs) were found in association with the Subject Property. No indication or evidence of previous, ongoing or the material threat of a hazardous material or petroleum hydrocarbon release was detected during the investigation and implementation of this Phase I ESA. The Subject Property was not listed in any of the environmental databases queried.

Data Gaps

There were a few minor data gaps associated with historical information sources (gaps in dates of historic aerial photographs and historical topographic maps) and a significant data gap involving lack of owner/user questionnaire and interviews. Despite a good faith effort, the lack of questionnaires and interviews with current owners limited Acorn Environmental's ability to analyze current and previous land uses and historic use. However, a combination of other data sources was available such as the 2005 Raney Phase I ESA and associated previous owner interviews. This Phase I ESA was prepared by the current owner of the Subject Property. Therefore, though a significant data gap is noted, other forms of information provided enough documentation for Acorn Environmental to identify recognized environmental conditions associated with the Subject Property. Except for the limitations and exceptions discussed in Sections 1.4 and 5.1, this Phase I ESA complies with the ASTM Practice E1527-21 and E 2247-16.

Findings

This Phase I ESA revealed no evidence of historical or current recognized environmental conditions, or *de minimis conditions*, in connection with the Subject Property pursuant to the ASTM Practice E1527-21 and E 2247-21.

Recommendations

Records review, database searches, and site investigation failed to identify any recognized environmental conditions in connection with the Subject Property. Therefore, no further hazardous materials investigations of the Subject Property are recommended.

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Section 1 | Introduction

1.1 LOCATION AND LEGAL DESCRIPTION

The Subject Property is located adjacent to Promenade Parkway within the City of Elk Grove, Sacramento County, California, as shown in **Figure 1** and **Figure 2**. An aerial photograph of the Subject Property is shown in **Figure 3**. The Subject Property, totaling 129 acres, is identified as Sacramento County APNs 134-1030-001, 134-1030-002, 134-1030-004, 134-1030-005, 134-1030-006, 134-1030-007, 134-1030-008, 134-1030-009, 134-1010-013, 134-1010-008, 134-1010-005, 134-1010-004, 134-1010-003, 134-1010-002. These parcels are located to the west of State Highway 99, north of Kammerer Road, and on both sides of Promenade Parkway. The topography of the Subject Property ranges from 43 feet along the northern property boundary to 39 feet along the southern boundary.

1.1.1 Subject Property Characteristics and Current Use

The Subject Property is disturbed open space/agriculture land surrounded by roadway and utility infrastructure within the City of Elk Grove. The Subject Property is within City of Elk Grove Lent Ranch Marketplace Special Planning Area (SPA) and zoned SPA with an intended land use defined as urban development (City of Elk Grove, 2014). A rural residential development and airstrip was previously developed on APN 134-1030-008. Remnants of the airstrip are noted, however a historic electrical utility pole is the only evidence of the residential unit. Two inactive wells are located within this parcel. Active dry land agriculture is ongoing on several parcels within the Subject Property. Bales of vegetation were noted during the June 26, 2023 site visit. A stormwater basin is located within the southern portion of APN 134-1010-005. Evidence of past grading activities is found on APN 134-1010-004.

1.1.2 Current Use of Adjoining Properties

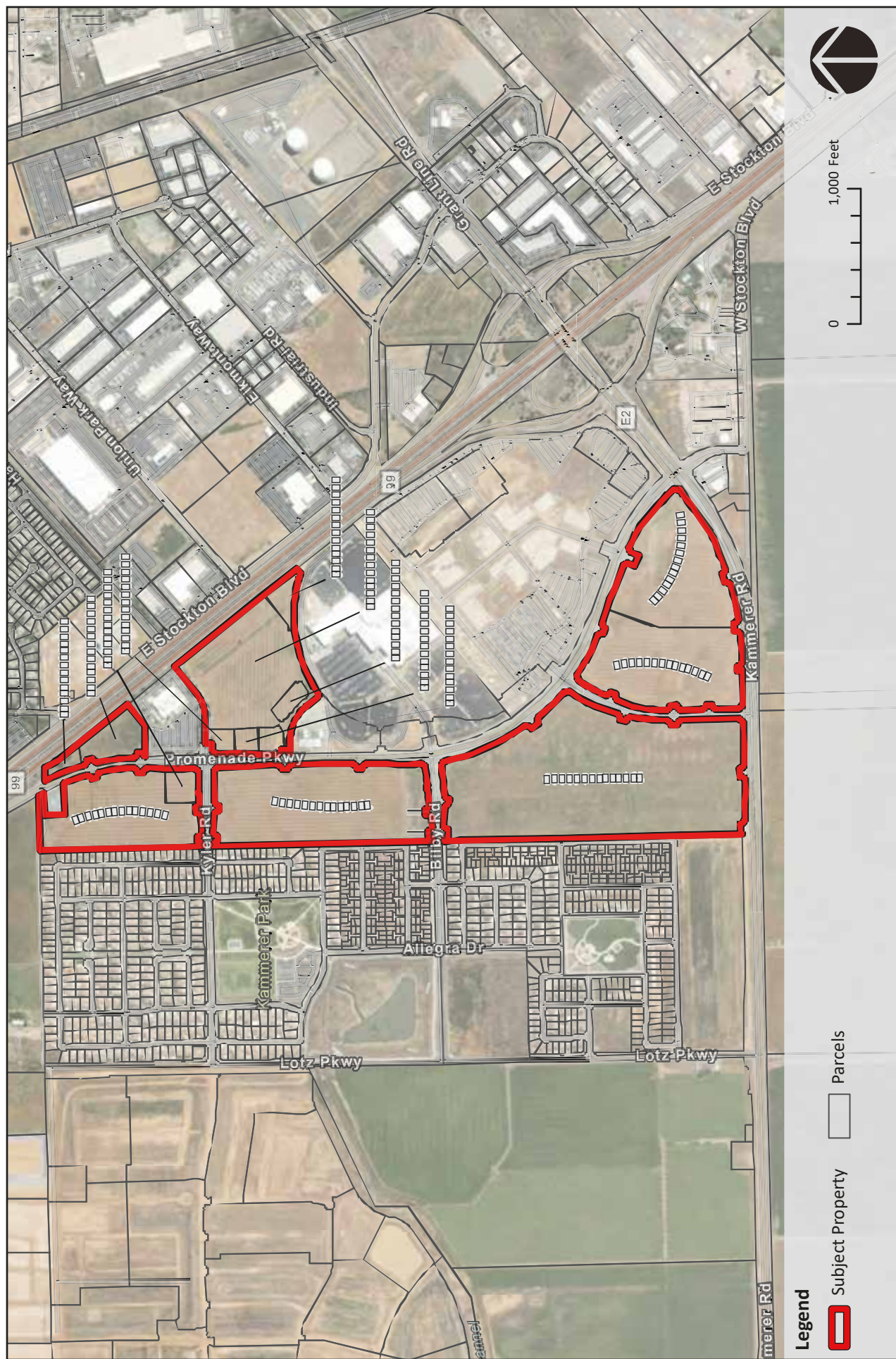
The parcels surrounding the Subject Property are located within the City of Elk Grove Lent Ranch SPA (City of Elk Grove, 2014). The Sky River Casino, a gaming facility, owned by the Wilton Rancheria, and a Kaiser Permanente medical facility are located along Promenade Parkway adjacent to APN 134-1030-008. A residential development is located adjacent to the western boundary of the Subject Property. A Chevron fueling station is located to the south of the Subject Property across Kammerer Road.

1.2 PURPOSE

This Phase I Environmental Site Assessment (Phase I ESA) has been prepared in conformance with American Society for Testing and Materials (ASTM) Standard Practice E 1527-21, which specifies the appropriate inquiry requirement for the innocent landowner defense under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the U.S. Environmental Protection Agency (EPA) (40 CFR 132) All Appropriate Inquiry (AAI) regulations (ASTM, 2021). According to AAI standards, the objective of the inquiry is to identify conditions indicative of releases or threatened releases of hazardous substance, pollutants, contaminants, petroleum and petroleum products, and controlled substances to the Subject Property. Additionally, this Phase I was prepared consistent with ASTM E 2247-16, which outlines the procedures and practices involved in assessing the environmental liabilities, contamination risks, and historical uses of rural properties.



FIGURE 1



Source: ESRI, NASA USGS, Sacramento County

The purpose of this Phase I ESA is to identify Recognized Environmental Conditions (RECs), as defined by Section 1.1.1 of ASTM E 1527-21 and E 2247-16, which may affect future uses or pose a threat to site occupants of the Subject Property.

The term REC refers to the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of release of any hazardous substances or petroleum products within a property into structures or the ground, groundwater, or surface water. The term REC is not intended to include *de minimis* conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Historical Recognized Environmental Conditions (HREC) refers to an environmental condition, including a past release of any hazardous substance or petroleum product that has since been remediated, which in the past would have been considered a REC; and the term Controlled Recognized Environmental Conditions (CREC) refers to hazardous substance releases that have been partially addressed through remediation but where some contamination remains in place under certain risk-based restrictions or conditions. Evaluation for HRECs and CRECs are included in this Phase I ESA.

The term *de minimis* condition is defined as “a condition related to a release that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be *de minimis* are not RECs nor CRECs.”

1.3 SCOPE OF WORK

Acorn Environmental was contracted by the Wilton Rancheria (Tribe) to conduct a Phase I ESA in conformance with ASTM Standard Practice E 1527-21 and E 2247-16 for due diligence purposes during escrow for the purchase of the Subject Property. As scoped, this Phase I ESA includes the following tasks:

- Review of previously prepared environmental documentation/ESAs for the Subject Property,
- Site reconnaissance inspection and visual reconnaissance of the Subject Property and adjacent properties to document the setting and identify potential sources of contamination,
- Review of relevant database listings of hazardous material sites, waste generators, and underground storage tanks (UST),
- Review of historical records and physical setting information for the Subject Property and surrounding area to identify past land use activities and hydrogeologic conditions and to evaluate the risk associated with identified activities,
- Attempts to conduct interviews and questionnaires with owners, operators, occupants, and/or local government officials with knowledge of current and historical uses of the Subject Property,
- Report documentation to indicate findings, data gaps, conclusions, and recommendations, if needed.

Physical testing of soil or groundwater is not within the scope of this Phase I ESA. Neither testing for asbestos-containing building materials nor lead-based paint surveys is included as part of this assessment.

1.4 ASSUMPTIONS, DEVIATIONS, LIMITATIONS, AND EXCEPTIONS

This Phase I ESA is prepared through a best-effort collection and interpretation of readily available information prepared consistent with the industry standards for completion of a Phase I ESA.

Acorn Environmental made the following assumptions in the preparation of the Phase I ESA:

- Groundwater Flow Direction – direction of groundwater flow was assumed based on information obtained (EDR report), topography, and previously prepared technical studies. The actual flow of localized groundwater may be influenced by factors beyond the scope of this assessment. Subsurface investigation would be necessary to determine site-specific flow direction.
- Regulatory Agency Information –all information provided by EDR, CalEPA, and local records regarding the regulatory status was considered to be complete, accurate, and current.

No Phase I ESA can completely eliminate uncertainty regarding the potential for RECs in connection with a property, nor can it eliminate future hazards. Conformance of this Phase I ESA with ASTM Standard Practice E 1527-21 and E 2247-16 will reduce, but not eliminate, uncertainty regarding the potential for RECs in connection with the Subject Property. While every effort has been made to discover and interpret available historic and current information regarding the Subject Property within the time available, the possibility of undiscovered contamination remains.

Acorn Environmental, as an impartial and independent contractor, has completed this Phase I ESA in accordance with ASTM E 1527-21 and E 2247-16 and in accordance with the prevailing standard of care for completing such assessments at this time. Acorn Environmental shall not be subject to any express or implied warranties whatsoever. There are no special terms or contractual conditions for this Phase I ESA. There are no limiting conditions or deviations from the ASTM E 1527-21 and E 2247-16 standards in the preparation and no User-imposed constraints.

Any data gaps are listed in Section 5.1.

Section 2 | Interviews and User Provided Information

Section 2 presents a summary of the information on the Subject Property and surrounding area provided to Acorn by the Owner/User via a standard property questionnaires and interviews.

2.1 USER/OWNER QUESTIONNAIRE AND OWNER PROVIDED INFORMATION

An Owner questionnaire was provided to M/H Realty Partners Affiliated Fund III LP on June 22, 2023. The Owner questionnaire was not completed as a matter of owner policy. A user questionnaire was provided to representatives of the Tribe on June 22, 2023. No User questionnaire was provided to Acorn.

The representative of the Owner provided Acorn with Sacramento County documentation of the existence of two groundwater wells on the Subject Property and a previously prepared Phase I ESA from 2005. This 2005 Phase I ESA (Raney Geotechnical Inc, 2005; **Appendix H**) documents the Subject Property as agricultural land with the remnants of a rural residential unit (relocated in 2002) and small portion of a small aircraft runway on a portion of APN 134-1030-008. The 2005 Phase I ESA did not identify any on-site conditions or concerns considered threatening to the environmental integrity of the subject property (Raney Geotechnical, 2005). Where appropriate, information within the 2005 Raney Phase I ESA is referenced as a historic data source.

2.2 TITLE RECORDS, ENVIRONMENTAL LIENS, ACTIVITY AND USE LIMITATION

The Subject Property is currently owned by M/H Realty Partners Affiliated Fund III LP. Through the purchase process the Tribe commissioned First American Title to provide an ALTA Commitment for Title Insurance for the Subject Property which identifies a chain of title, title liens and any encumbrances which may indicate current or past hazardous materials involvement (First American Title, 2023). No environmental liens or active use limitations were identified from review of the title commitment documentation, interview process, or review of County records.

2.3 PROPERTY REPRESENTATIVE INTERVIEWS

As a matter of policy, no interviews were provided by the current owner of the Subject Property. This significant data gap is discussed in Section 5.1.

Section 3 | Site Reconnaissance

3.1 OBJECTIVE

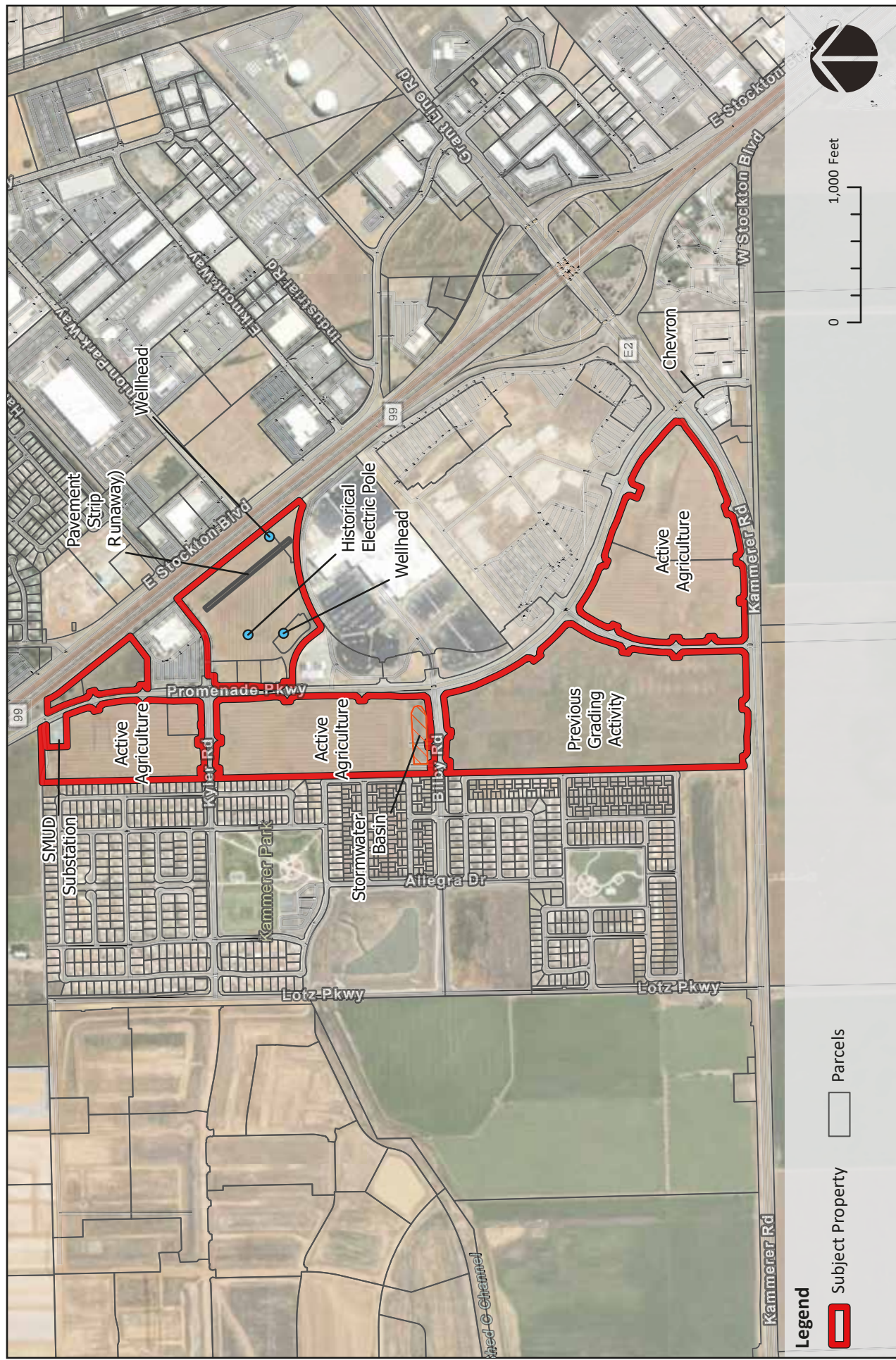
The objective of the site reconnaissance is to identify the occurrence of potential current or historic hazardous materials or petroleum involvement within or in the vicinity of the Subject Property. Signs of possible hazardous materials or petroleum involvement would include any indications of USTs existing on the Subject Property; stained soils and/or unusual odors originating from the Subject Property; indications of any excavation or removal of soils, including patched asphalt and large debris piles; and other obvious signs of hazardous materials involvement.

3.2 SITE OBSERVATIONS

David Sawyer (environmental scientist, Acorn Environmental) conducted a site reconnaissance inspection of the Subject Property and a visual reconnaissance of adjacent properties on June 26, 2023. All accessible portions of the Subject Property were observed by a pedestrian survey. **Appendix F** provides photographs that show the site conditions at the time of the site visit. Notable features and environmental conditions are summarized below and located on **Figure 4**:

- The Subject Property is primarily undeveloped agricultural lands. Active dry land agriculture is ongoing within parcels identified as APNs 134-1030-004, 134-1030-005, 134-1030-006, 134-1030-007, 134-1030-008, 134-1030-009, 134-1010-013, 134-1010-008, 134-1010-005, 134-1010-003, 134-1010-002 of the Subject Property. City of Elk Grove roadway infrastructure and utilities are currently in place within easements located along roadways in and adjacent to the Subject Property.
- Two groundwater wells were detected during the site reconnaissance in APN 134-1030-008. A deteriorated paved strip is located within this parcel in the location of the historic airstrip and a historic electrical utility pole is located in an area where the historic residential unit was noted in historic aerials. No electrical connection was noted during the site visit to the utility pole or the two groundwater wells.
- City of Elk Grove water and sewer lines are located within roadways and easements along Promenade Parkway, Lent Ranch Parkway, Kyler Road, and Kammerer Road. A stormwater basin is located in the southern portion of APN 134-1010-005.
- No stained soil, distressed vegetation, or unusual odors were noted during the site reconnaissance.
- Access roads surrounding the Subject Property are paved and maintained by the City of Elk Grove.
- No hazardous substances or petroleum product usage or storage was noted on the Subject Property or adjoining properties during the site reconnaissance.

Site observations are summarized in **Table 1**.



Source: ESRI, NASA USGS, Sacramento County

TABLE 1: SITE OBSERVATIONS

Site Settings	Observations
Current Uses of Property	Undeveloped land; dry agriculture
Past Uses of Property	Agriculture
Current Uses of Adjacent Property	North: Agriculture. Urban development to the east of Highway 99.
	South: Agriculture. Chevron fueling station to the southwest of Promenade Parkway/Kammerer Road intersection.
	East: Highway 99, industrial/commercial to east of Highway 99, Kaiser Permanente medical center, Sky River Casino adjacent to Subject Property west of Highway 99.
	West: Residential development.
Current/Past Uses in the Surrounding Area	Agriculture/Residential development/ Industrial/Commercial to the east of Highway 99.
Geologic, Hydrogeologic, Hydrologic, and Topographic Conditions	Topography consists of flat plain.
General Description of Structures	No structures on site.
Roads	City of Elk Grove maintained roadways surrounding parcels.
Potable Water Supply	Municipal water system.
Sewage Disposal System	Municipal sewage disposal system.
Waste Removal Services	No waste services.
Possible Hazardous Substances and Petroleum Products in Connection with Identified Uses	No substances or petroleum products noted.
Storage Tanks and Associated Piping	No storage tanks were observed.
Odors	No strong, pungent, or noxious odors were observed.
Pools of Liquid	No pools or liquid were observed.
Drums (5 gal to 55 gal containers should be described)	No drums were observed.
Potential Hazardous Substances and Petroleum Products Containers	No containers were observed.
Unidentified Substance Containers	No containers were observed.
Polychlorinated Biphenyls (PCB)	Potential PCB-containing equipment and electrical service is provided along power lines along Highway 99 and within buried utility vaults along roadway easements. A SMUD substation is located along the northern boundary of the Subject Property.
Pits, Ponds, or Lagoons	No pits or lagoons were observed.
Stained Soil or Pavement	No stained soil or pavement was observed.

Stressed Vegetation	No stressed vegetation was observed.
Solid Waste	No significant amount of trash on the Subject Property. Small piles of household waste was dumped near the stormwater basin in APN 134-1010-005.
Waste Water	No wastewater discharge or standing pools were observed.
Wells	Two wells noted on Subject Property.
Septic System	No septic systems were observed.
Stormwater drainage	Stormwater system associated with adjacent roadways. A large stormwater basin is located in APN 134-1010-005 which appears to accommodate runoff from area roadways.

3.3 ADJACENT PROPERTIES OBSERVATIONS

A survey of adjacent properties was performed to the extent possible without trespassing during the June 26, 2023, site visit. The purpose was to identify land uses of adjacent properties and determine if the current land use of the adjacent properties would affect the current and/or future planned use of the Subject Property. Conditions observed on the adjacent land uses are described below.

- North: Mix of undeveloped land and residential development to the west of State Highway 99. Urban development and Elk Grove Regional Park within the City of Elk Grove to the east of State Highway 99.
- South: Agriculture and undeveloped land to the south of Kammerer Road. Chevron Fueling Station to the south at the southwest intersection of Kammerer Road and Promenade Parkway. Mixed development of residential and commercial along Kammerer and State Highway 99 to the southeast.
- West: Residential development to the west ending at Lotz Parkway. West of Lotz Parkway includes some agricultural land along Kammerer Road and disturbed land partially developed with roadway infrastructure for residential development along Kyler Road.
- East: State Highway 99 in a north/south direction. Sky River Casino, disturbed land associated with historic mall development, and Kaiser Medical facility within parcels adjacent to the Subject Property to the east. Mixed industrial and commercial development within the City of Elk Grove to the east of State Highway 99.

Observations of adjoining-property uses do not indicate RECs to the Subject Property.

Section 4 | Records Review

This section summarizes the records review findings for the Subject Property and for adjoining and surrounding properties, including current use and development, physical setting, historical uses, and regulatory agency and database records.

4.1 PHYSICAL SETTING

The Subject Property is located on relatively flat terrain located in the middle portion of the Sacramento Valley within the City of Elk Grove. Land disturbance of the Subject Property has occurred through ongoing agricultural activities, previous rural residential development (APN 134-1030-007 and 134-1030-008) and partial surface grading impacts (APN 134-1010-004). Regional access to the Subject Property is provided by State Highway 99, which is located east of the Subject Property and runs in a general north-south direction (**Figure 1**).

According to the California Department of Conservation, the rock stratigraphic unit of the Subject Property is marine and non-marine sedimentary rocks from the Pleistocene-Holocene era (California Department of Conservation, 2023). San Joaquin silt loam dominate the Subject Property, with moderately well drained; with very slow infiltration rates (**Appendix A**; USDA, 2023). No wetland features have been classified by the United States Fish and Wildlife (USFWS) National Wetlands Inventory (NWI) within the Subject Property (USFWS, 2023).

The Subject Property is not located within a floodplain and is located within Flood Zone X, which is determined to be outside the 500-year flood and protected by levee from 100-year flood by the Federal Emergency Management Agency (FEMA, 2023). Surface waters within the Subject Property drain into stormwater collection systems associated with roadway infrastructure adjacent to the Subject Property.

According to the Environmental Data Resources, Inc. (EDR) report (see **Appendix A**) and California Department of Water Resources (DWR, 2023) there are 11 active wells within a 1-mile radius of the Subject Property. During the site visit, Acorn Environmental did not observe standing water in the parcels or within the stormwater basin.

4.2 HISTORICAL USE INFORMATION

The historic use of the Subject Property and adjoining properties was compiled through review of historical sources and reasonably ascertainable information pertaining to the Subject Property. Historical sources reviewed by Acorn Environmental included:

- Aerial photographs obtained from EDR and the county or other public sources dated 1937, 1947, 1957, 1964, 1966, 1972, 1984, 1993, 1998, 2006, 2009, 2012, 2016, and 2020. Aerial photographs were of varying clarity (**Appendix B**).
- Sanborn® Fire Insurance maps report obtained from EDR indicated the Subject Property was unmapped (**Appendix D**).

- Topographic maps, obtained from EDR, included the 1894 Lodi, 1941 Franklin, and the 1909, 1953, 1968, 1975, 1979, 1980, 2012, 2015 and 2018 Bruceville, Florin, Elk Grove, and Galt. (**Appendix C**).
- Current and historical tax assessor documents provided by EDR and Sacramento County.
- Pertinent information provided through questionnaires/interviews with the User/Owner of the Subject Property, and others.

The historical resources reviewed during the preparation of the Phase I ESA are in general accordance with the requirements of ASTM 1527-21 and E 2247-16. Copies of the historical records obtained from the sources above are provided in attached Appendices.

EDR's Sanborn report indicated that there is no coverage of the Subject Property, which is a minor data gap.

The following subsections provide the findings of the historical review.

4.2.1 Subject Property

The earliest historic physical record of development in the vicinity on the Subject Property is a 1909/1910 Topographic map, which shows the development of roadway to the south and east of the Subject Property. The 1964 aerial and 1968 topographic indicate a structure on APNs 134-1030-007 and 134-1030-008, identified as the historic Wackman home (Raney, 2005). This structure has been razed in the 2006 aerial. A well is noted in the southwestern portion of the Subject Property on the 1969 topographic map (note this well was not located during the June 2023 site visit).

Agricultural activities on portions of the Subject Property are ongoing from the 1937 aerial map till present.

No visual clues, outside of ongoing agricultural use and the previous use of construction equipment associated with the development of City of Elk Grove roadways, indicating possible recognized environmental conditions, were noted on the Subject Property.

4.2.2 Adjoining and Surrounding Properties

The following is a summary of the historical use of the adjoining and surrounding properties based on Acorn review of the historical sources during this study.

North: Urban development to the east of Highway 99 noted in the 1984 aerial map. Buildout of urban area noted in 1998 aerial with no change to present. Undeveloped agricultural land noted to the north of Subject Property, west of State Highway 99, from 1909/1910 topographic map to present.

South: Development of Kammerer Road noted in 1937 aerial. Undeveloped agricultural land noted in aerial photographs and topographic maps to the south of the Subject Property from 1894 topographic map to present.

East: Industrial/commercial development noted in 1975 topographic map to the east of State Highway 99. Development in this area is noted in 1993 and increases between 1998 and present

on aerial photographs. Mall structure to the east of Promenade Parkway is noted on the 2009 aerial and the Kaiser Permanente structure is noted on the 2012 aerial.

West: Undeveloped agricultural land noted in aerial photographs and topographic maps until 2009 aerial photograph. Partial roadway development to the west in 2009 with residential development noted in the 2020 aerial.

No RECs were identified based on the historical use of the adjoining and surrounding properties.

4.3 REGULATORY ENVIRONMENTAL RECORDS REVIEW

This section summarizes sources of environmental records in which the Subject Property is located. These sufficiently useful, accurate, and complete sources of environmental records pertaining to the Subject Property was reasonably ascertainable and were obtained pursuant to good commercial and customary practices.

4.3.1 Regulatory Agency Database Search

The regulatory agency database search was conducted by EDR on June 22, 2023, a computerized search firm that uses a geographic information system to plot locations of known storage tank sites and known sites of hazardous materials generation, storage, and/or contamination within the ASTM approximate minimum search distances. Although a site may be listed within a regulatory agency database search, the listed site may not currently be contaminated or affect the environmental quality of the Subject Property and therefore be considered a REC. The regulatory agency database search is only as accurate as the data and date the data entered into the regulatory agency-maintained database was last updated. If not reported to the appropriate regulatory agency, installation of USTs or hazardous materials releases would not be listed on the regulatory agency databases searched.

The complete list of reviewed regulatory agency databases, search distances, and results is provided in the Map Finding Summary section of the EDR radius map report included as **Appendix A**. The Subject Property is not listed in any databases queried by EDR. EDR identified a number of listed sites (Federal and State agency) located with ASTM standard search distances. These sites were reviewed based off site distance from the Subject Property and greatest possibility of impact to the Subject Property based on nature of condition and proximity. A table providing information on the closest, most pertinent, and relevant listed cases in the vicinity of the Subject Property is provided in **Table 2**.

TABLE 2: DATABASE LISTINGS

Listed Site	Regulatory Databases	Finding
SUBJECT PROPERTY		
Sacramento County Parcel Numbers 134-1030-001, 134-1030-002, 134-1030-004, 134-1030-005, 134-1030-006, 134-1030-007, 134-1030-008, 134-1030-009, 134-1010-013, 134-	None	NOT A REC

1010-008, 134-1010-005, 134-1010-004, 134-1010-003, 134-1010-002		
ADJACENT PROPOERTIES		
Kaiser Permanente	RCRA-SQG, RCRA – NonGen, FINDS,	NOT A REC
Medical waste storage and handling noted as a small quantity generator. No violations noted.		
Promenade Chevron	CERS HAZ WASTE, HWTS, UST	NOT A REC
Violations noted for procedure documentation only. No noted leaks or handling violations on record.		
SURROUNDING PROPERTIES		
Georgia Pacific Resin	CPS-SLIC, CHMIRS, SACRAMENTO CO. ML, CERS, ENVIROSTAR, VCP	NOT A REC
Located at 10399 East Stockton Boulevard approximately 1,600 east of the Subject Property. Constructed in 1966, the resin production facility detected a leak in a 70,000-gallon molten phenol storage tank in 1993. Voluntary cleanup actions included subsurface investigations which found impacted soils in the vicinity of the above ground storage tank. 500 cubic yards of impacted soils from the upper 12 feet of the area were removed in 1993. After remediation, CRWQCB released a “No Further Action” letter in July 1997. Voluntary cleanup programs were additionally implemented in 2011 with a secondary letter issued in 2013.		
Flying V Service Station	LUST, CORTESE, SACRAMENTO CO. CS, HIST CORTESE	NOT A REC
Located at 10473 East Stockton Boulevard, approximately 1,000 feet east of the Subject Property. In 1990 soil contamination was discovered at fueling station site during exploratory drilling around three on-site 10,000-gallon fuel tanks. Sampling and analysis revealed petroleum hydrocarbons in soil samples. A groundwater well was installed and groundwater contamination was confirmed in 1990 for petroleum hydrocarbons and BTEX. USTs were removed in 1994 and bioremediation of impacted soils and groundwater was performed. Central Valley Regional Water Quality Control Board closed the case in April of 1998.		
Arco #5752	LUST, CORTESE, CERS, CHMIRS, SACRAMENTO CO. CS	NOT A REC
Located at 10466 Grant Line Road, approximately 1,400 feet east/southeast of the Subject Property. In 2003, soil contamination was discovered at fueling station site during exploratory drilling around three 10,000-gallon fuel tanks. Sampling and analysis revealed petroleum hydrocarbons in soil samples. A groundwater well was installed in 2003 and groundwater contamination for Toluene and xylene was confirmed. Groundwater monitoring continued through 2005 with well abandoned approved by Sacramento County in 2006. During decommissioning of the site for construction of freeway access roadways to State Highway 99 in 2007 soil samples noted gasoline range organics and methyl tertiary butyl ether. A remediation workplan was developed and previously closed 2006 case was not reopened per Sacramento County.		

4.3.2 California Environmental Protection Agency

Acorn Environmental reviewed public records for the Subject Property and any adjoining properties via the California Environmental Protection Agency public record request portal (CalEPA, 2023). No records are noted for the Subject Property.

According to the CalEPA portal, the closest listed site (non-construction activity), the Promenade Chevron, is located adjacent to the Subject Property to the south of Kammerer Road. The Chevron site is listed and regulated as a Chemical storage facility, hazardous waste generator, and UST. Regulatory agency evaluations with violations are noted in 2020 and 2021, however these violations are procedure documentation errors in nature and not indicative of hazardous materials releases (CalEPA, 2023).

Based on the continued regulatory oversight and the downgradient nature from the Subject Property, the Promenade Chevron site is not considered a REC to the Subject Property.

4.3.3 Sacramento County Public Records

Acorn Environmental submitted a public records request to Sacramento County on June 22, 2023, for any Subject Property records maintained by the County health and environmental departments. Peggy Silva, Administrative Services Officer with the Environmental Management Department, responded via email that they did not have any records pertaining to hazardous material involvement or storage for the Subject Property (Sacramento County Environmental Management Division, 2023) (**Appendix J**).

4.3.4 Previous Environmental Studies

A Phase I ESA, authorized by the current owners, was prepared by Raney Geotechnical Inc in 2005. Where appropriate this 2005 was used as reference including use of historic property use review. The 2005 Raney Phase I ESA was prepared in accordance with ASTM E 1527-00. Information in the 2005 Phase I ESA, including interviews with land owners and land use managers, indicates no environmental concerns or conditions regarding past or present use of the Subject Property and that additional environmental investigation is not necessary (Raney, 2005).

Section 5 | Evaluation

5.1 ASTM SIGNIFICANT DATA GAPS

ASTM defines a data gap as a lack, of or inability to obtain, information required by this practice despite good faith efforts by the Environmental Professional to gather such information. Data gaps may result from incompleteness in any of the activities required by this practice, including, but not limited to site reconnaissance (for example, an inability to conduct the site visit), and interviews (for example, an inability to interview the key site manager, regulatory officials, etc.)

A data gap of greater than five years is present between historical information sources (historic aerials and historic topographic maps), no Owner questionnaire or interviews were provided to Acorn Environmental, and Sanborn Maps were not available. The lack of completed questionnaires and interviews is identified as a significant data gap. The inability to obtain these documents despite a good faith effort has limited Acorn's ability to analyze current and historic site use. However, using the historical information sources available, including topographic maps and aerials, the owner provided 2005 Raney Phase I ESA (**Appendix H**), Acorn Environmental believes that a thorough site history could be constructed for the Subject Property and historical research objectives were achieved. There were no deletions from the ASTM Practice E1527-21 and E 2247-16.

5.2 FINDINGS

Based on information gathered while conducting this Phase I ESA for the Subject Property (Sacramento County APNs 134-1030-001, 134-1030-002, 134-1030-004, 134-1030-005, 134-1030-006, 134-1030-007, 134-1030-008, 134-1030-009, 134-1010-013, 134-1010-008, 134-1010-005, 134-1010-004, 134-1010-003, 134-1010-002) in the City of Elk Grove, Sacramento County, California, the following conditions were observed:

- The Subject Property is undeveloped open space with minor agricultural activities ongoing. Roadway infrastructure and utility improvements have occurred adjacent to and within easement associated with the Subject Property. No structures or equipment storage are located on the Subject Property
- During the site reconnaissance inspection, there was no visible evidence of hazardous materials storage, use, or releases observed within the Subject Property.
- Records reviewed found no environmental liens or AULs on the Subject Property.
- Database and records queries noted no listed cases of hazardous materials involvement on the Subject Property. Noted cases in the vicinity of the Subject Property have either been mitigated and closed or are under continued regulatory oversight by appropriate agencies.

Pursuant to ASTM E1527-21 and E 2247-16, this assessment revealed no RECs in connection with the Subject Property.

5.3 CONCLUSIONS

This Phase I ESA has been prepared in conformance with ASTM Standard Practice E 1527-21 and E 2247-16. Any data gaps, exceptions to, or deletions from, this practice are described in **Section 1.4** and **Section 5.1** of this report.

Based on the site conditions during the June 26, 2023 site reconnaissance inspection, EDR report (**Appendices B, C, D, E, and A**), information provided in a previously prepared Phase I ESA, and records review, no RECs, CRECs, BECs, HRECs, or de minimis conditions, were identified in connection with the Subject Property.

5.4 RECOMMENDATIONS

Based on the findings and the scope of work of this Phase I ESA, no further investigation of the Subject Property is recommended at this time.

Section 6 | Report Authors

The undersigned declare to the best of their professional opinion that they meet the definition of Environmental Professional as defined in §312.10 of 40 CFR 312. David Sawyer, Site Assessor and Report Preparer, assembled this report under the professional supervision of Ryan Sawyer, AICP (American Institute of Certified Planners), who qualifies as an environmental professional (EP) as defined in the ASTM Standard E1527-21 and E 2247-16, and have the specific qualifications based on education, training, and experience to assess a property of the nature, and setting of the Subject Property. The signature of Ryan Sawyer, AICP appears below and her resume is included in **Appendix H**.

REPORT PREPARATION

Acorn Environmental
5170 Golden Foothill Parkway
El Dorado Hills, CA 9562



7/10/2023

Environmental
Professional:

Ryan Sawyer, AICP

Date

Section 7 | References

- American Society for Testing and Materials (ASTM), 2016. Practice E2247-16: “Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process for Forestland or Rural Property.”
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Appendix A

EDR Radius Map Report

(Available Upon Request)

Appendix B

Historical Aerial Photographs



Wilton Elk Grove Parcels

Promenade Parkway

Elk Grove, CA 95757

Inquiry Number: 7371624.11

June 23, 2023

The EDR Aerial Photo Decade Package



6 Armstrong Road, 4th floor
Shelton, CT 06484
Toll Free: 800.352.0050
www.edrnet.com

EDR Aerial Photo Decade Package

06/23/23

Site Name:

Wilton Elk Grove Parcels
Promenade Parkway
Elk Grove, CA 95757
EDR Inquiry # 7371624.11

Client Name:

Acorn Environmental
5170 Golden Foothill Parkway
El Dorado Hills, CA 95762
Contact: David Sawyer



Environmental Data Resources, Inc. (EDR) Aerial Photo Decade Package is a screening tool designed to assist environmental professionals in evaluating potential liability on a target property resulting from past activities. EDR's professional researchers provide digitally reproduced historical aerial photographs, and when available, provide one photo per decade.

Search Results:

<u>Year</u>	<u>Scale</u>	<u>Details</u>	<u>Source</u>
2020	1"=750'	Flight Year: 2020	USDA/NAIP
2016	1"=750'	Flight Year: 2016	USDA/NAIP
2012	1"=750'	Flight Year: 2012	USDA/NAIP
2009	1"=750'	Flight Year: 2009	USDA/NAIP
2006	1"=750'	Flight Year: 2006	USDA/NAIP
1998	1"=750'	Acquisition Date: January 01, 1998	USGS/DOQQ
1993	1"=750'	Acquisition Date: May 23, 1993	USGS/DOQQ
1984	1"=750'	Flight Date: June 08, 1984	USDA
1972	1"=750'	Flight Date: June 28, 1972	USDA
1966	1"=750'	Flight Date: August 05, 1966	USGS
1964	1"=750'	Flight Date: May 19, 1964	USDA
1957	1"=750'	Flight Date: September 09, 1957	USDA
1947	1"=750'	Flight Date: July 28, 1947	USGS
1937	1"=750'	Flight Date: August 17, 1937	USDA

When delivered electronically by EDR, the aerial photo images included with this report are for ONE TIME USE ONLY. Further reproduction of these aerial photo images is prohibited without permission from EDR. For more information contact your EDR Account Executive.

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INQUIRY #: 7371624.11

YEAR: 2016

— = 750'





INQUIRY #: 7371624.11

YEAR: 2012

— = 750'





INQUIRY #: 7371624.11

YEAR: 2009

= 750'



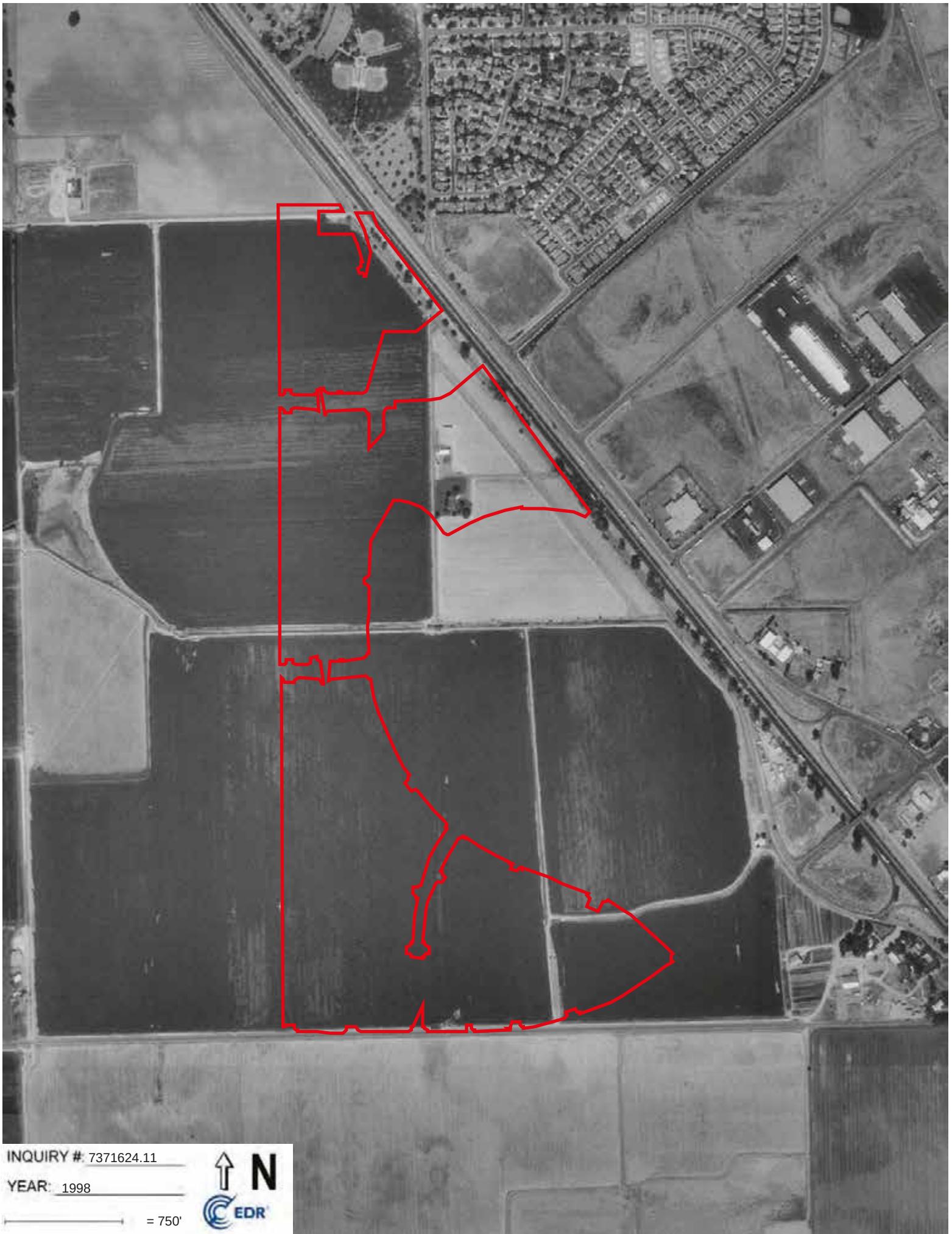


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— = 750'



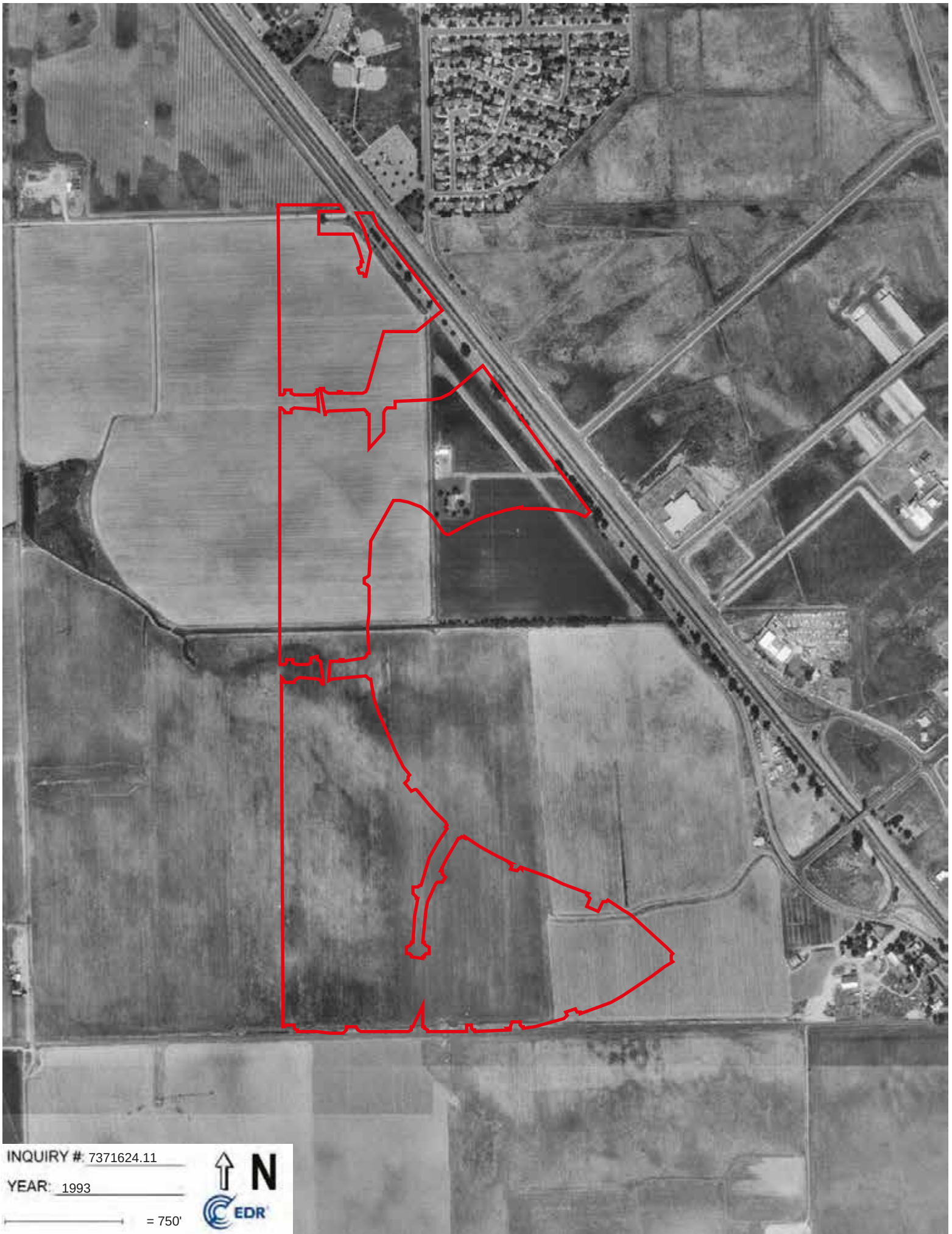


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YEAR: 1998

— = 750'





INQUIRY #: 7371624.11

YEAR: 1993

— = 750'



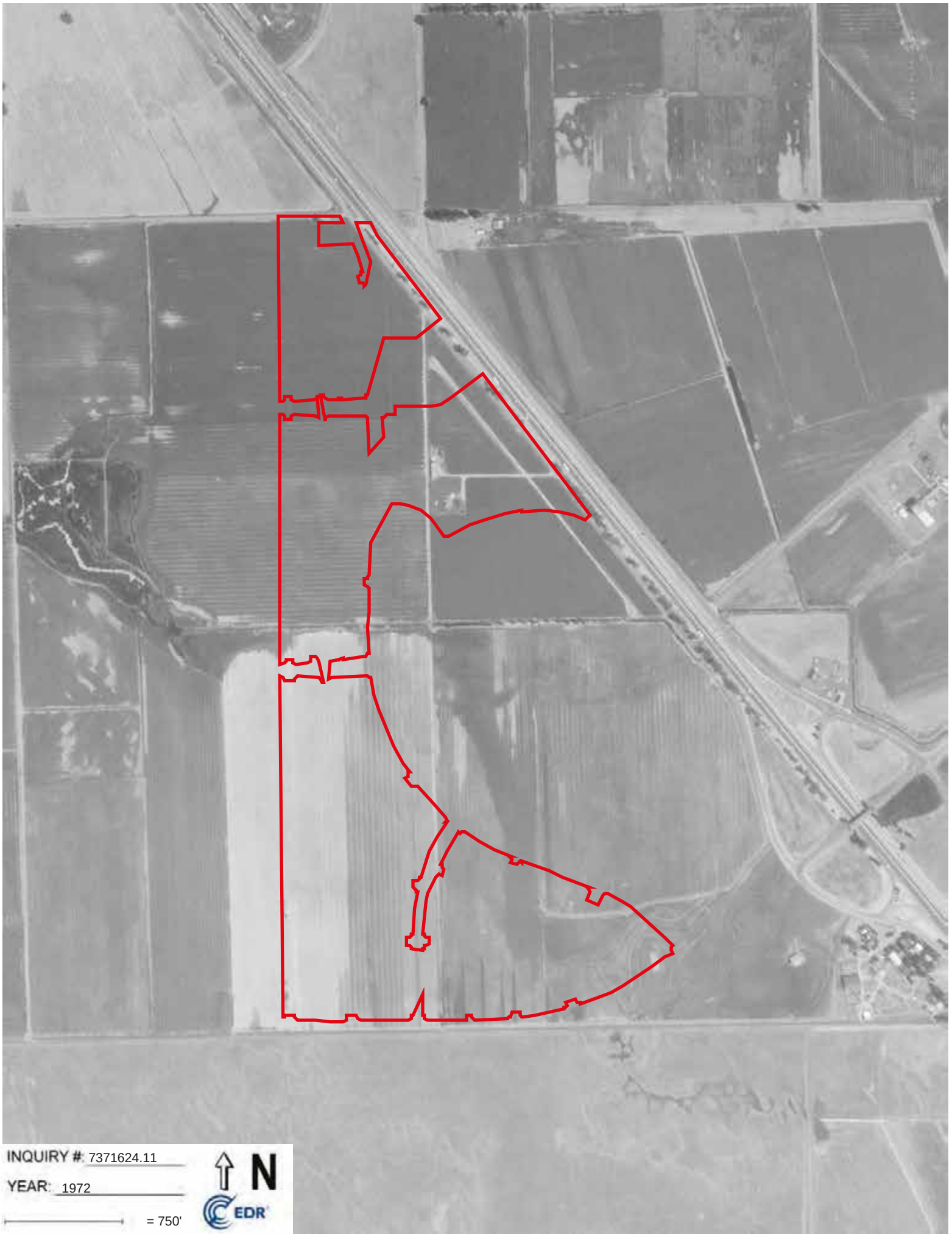


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YEAR: 1984

— = 750'



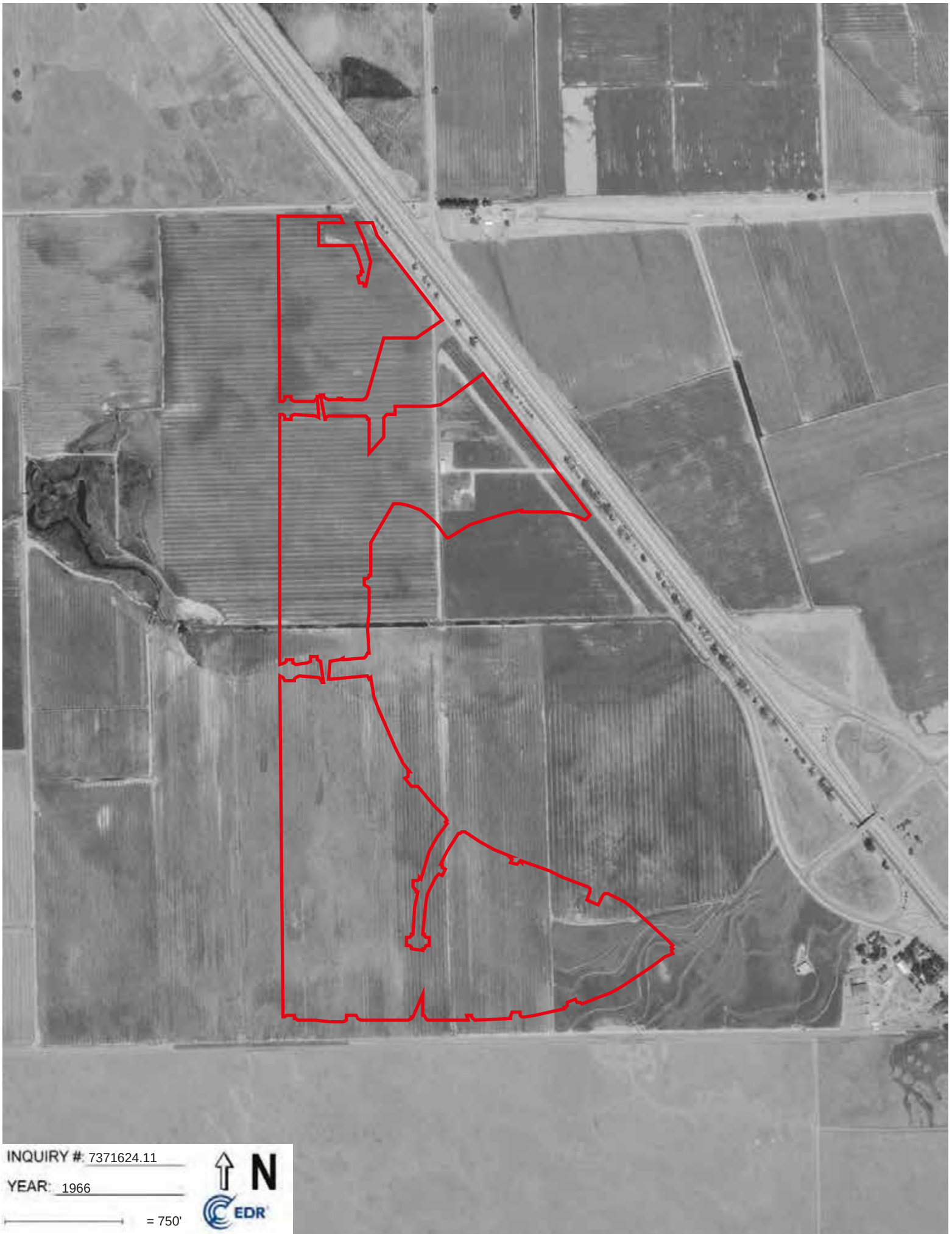


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YEAR: 1972

— = 750'





INQUIRY #: 7371624.11

YEAR: 1966

— = 750'



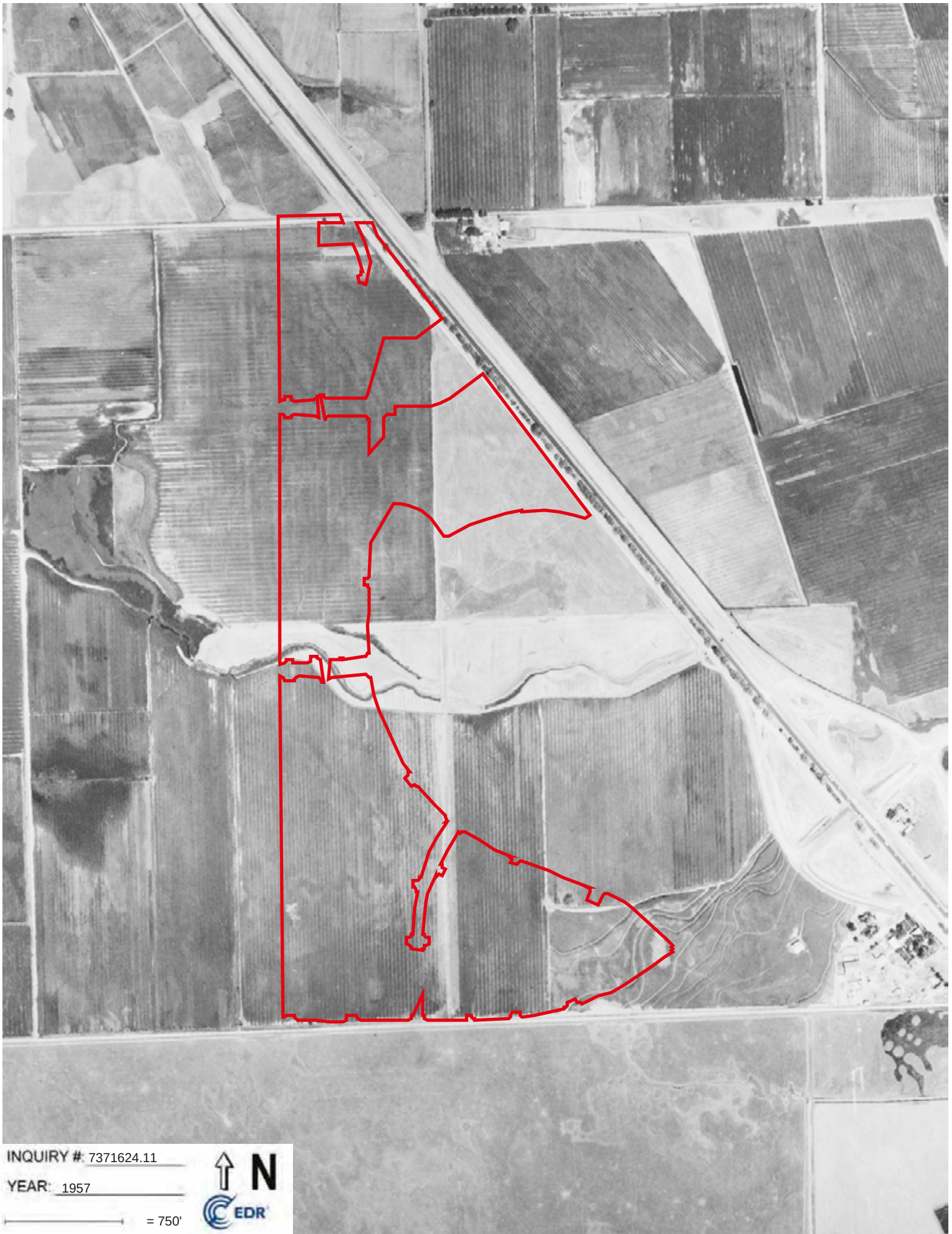


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YEAR: 1964

— = 750'





INQUIRY #: 7371624.11

YEAR: 1957

— = 750'





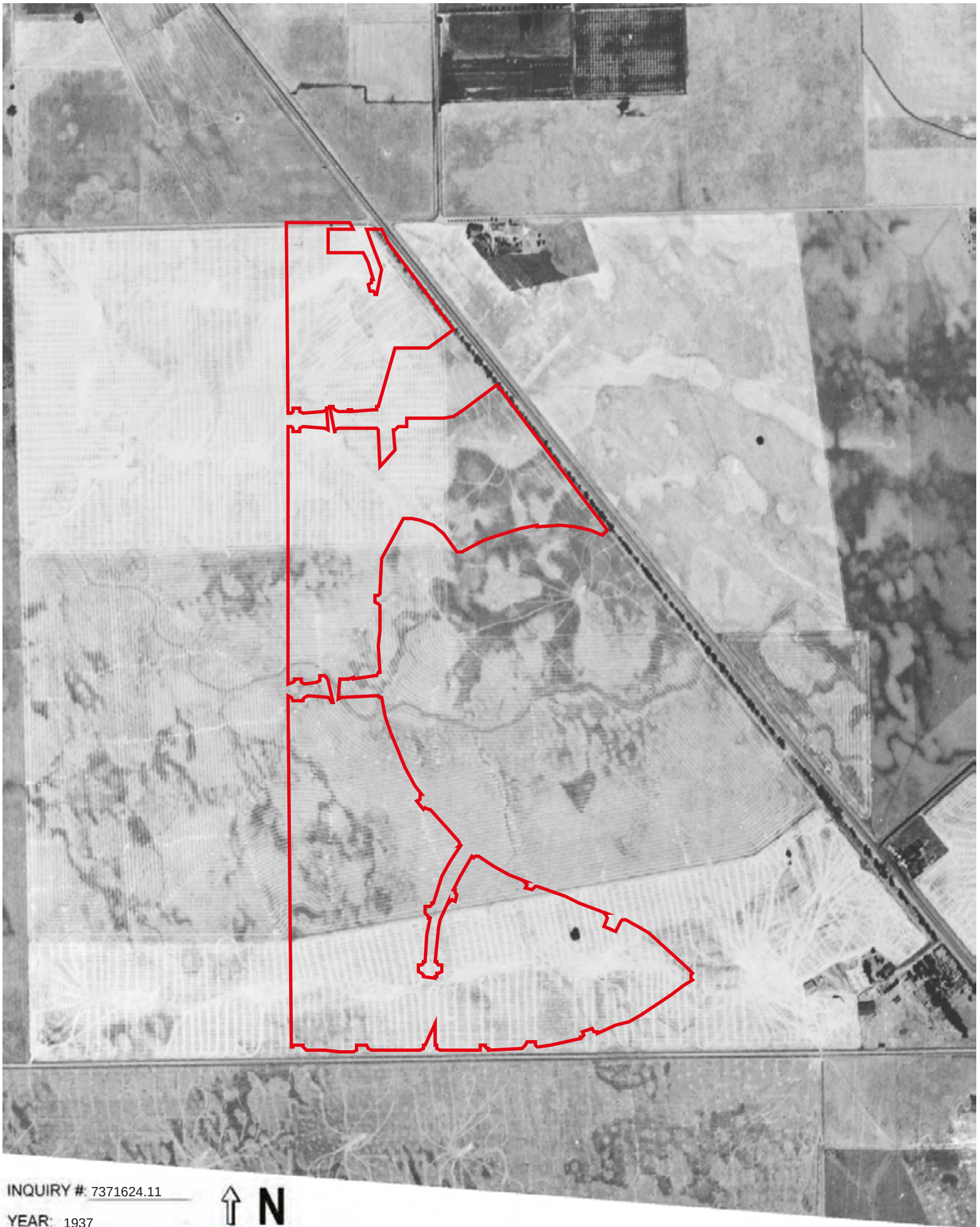
INQUIRY #: 7371624.11

YEAR: 1947

— = 750'



Subject boundary not shown because it exceeds image extent or image is not georeferenced.



INQUIRY #: 7371624.11

YEAR: 1937

— = 750'



Appendix C

Historical Topographic Maps



Wilton Elk Grove Parcels

Promenade Parkway

Elk Grove, CA 95757

Inquiry Number: 7371624.4

June 22, 2023

EDR Historical Topo Map Report

with QuadMatch™



6 Armstrong Road, 4th floor
Shelton, CT 06484
Toll Free: 800.352.0050
www.edrnet.com

EDR Historical Topo Map Report

06/22/23

Site Name:

Wilton Elk Grove Parcels
Promenade Parkway
Elk Grove, CA 95757
EDR Inquiry # 7371624.4

Client Name:

Acorn Environmental
5170 Golden Foothill Parkway
El Dorado Hills, CA 95762
Contact: David Sawyer



EDR Topographic Map Library has been searched by EDR and maps covering the target property location as provided by Acorn Environmental were identified for the years listed below. EDR's Historical Topo Map Report is designed to assist professionals in evaluating potential liability on a target property resulting from past activities. EDR's Historical Topo Map Report includes a search of a collection of public and private color historical topographic maps, dating back to the late 1800s.

Search Results:**Coordinates:**

P.O.#	2219	Latitude:	38.381482 38° 22' 53" North
Project:	Wilton Elk Grove Parcels	Longitude:	-121.373978 -121° 22' 26" West
		UTM Zone:	Zone 10 North
		UTM X Meters:	642022.10
		UTM Y Meters:	4249394.07
		Elevation:	42.00' above sea level

Maps Provided:

2018	1941
2015	1909, 1910
2012	1894
1979, 1980	
1975	
1968	
1952, 1953	
1947	

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Topo Sheet Key

This EDR Topo Map Report is based upon the following USGS topographic map sheets.

2018 Source Sheets



Elk Grove
2018
7.5-minute, 24000



Florin
2018
7.5-minute, 24000



Galt
2018
7.5-minute, 24000



Bruceville
2018
7.5-minute, 24000

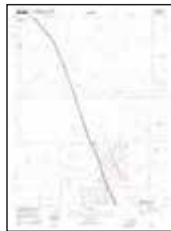
2015 Source Sheets



Elk Grove
2015
7.5-minute, 24000



Florin
2015
7.5-minute, 24000



Galt
2015
7.5-minute, 24000



Bruceville
2015
7.5-minute, 24000

2012 Source Sheets



Elk Grove
2012
7.5-minute, 24000



Florin
2012
7.5-minute, 24000



Galt
2012
7.5-minute, 24000



Bruceville
2012
7.5-minute, 24000

1979, 1980 Source Sheets



Elk Grove
1979
7.5-minute, 24000
Aerial Photo Revised 1978



Bruceville
1980
7.5-minute, 24000
Aerial Photo Revised 1978



Florin
1980
7.5-minute, 24000
Aerial Photo Revised 1978



Galt
1980
7.5-minute, 24000
Aerial Photo Revised 1978

Topo Sheet Key

This EDR Topo Map Report is based upon the following USGS topographic map sheets.

1975 Source Sheets



Galt
1975
7.5-minute, 24000
Aerial Photo Revised 1975



Bruceville
1975
7.5-minute, 24000
Aerial Photo Revised 1975



Florin
1975
7.5-minute, 24000
Aerial Photo Revised 1975



Elk Grove
1975
7.5-minute, 24000
Aerial Photo Revised 1975

1968 Source Sheets



Elk Grove
1968
7.5-minute, 24000
Aerial Photo Revised 1966



Galt
1968
7.5-minute, 24000
Aerial Photo Revised 1967



Florin
1968
7.5-minute, 24000
Aerial Photo Revised 1966



Bruceville
1968
7.5-minute, 24000
Aerial Photo Revised 1967

1952, 1953 Source Sheets



Elk Grove
1952
7.5-minute, 24000
Aerial Photo Revised 1949



Florin
1953
7.5-minute, 24000
Aerial Photo Revised 1949



Galt
1953
7.5-minute, 24000



Bruceville
1953
7.5-minute, 24000
Aerial Photo Revised 1949

1947 Source Sheets



GALT
1947
15-minute, 50000

Topo Sheet Key

This EDR Topo Map Report is based upon the following USGS topographic map sheets.

1941 Source Sheets



Franklin
1941
15-minute, 62500
Aerial Photo Revised 1939

1909, 1910 Source Sheets



Florin
1909
7.5-minute, 31680



Elk Grove
1909
7.5-minute, 31680



Galt
1910
7.5-minute, 31680

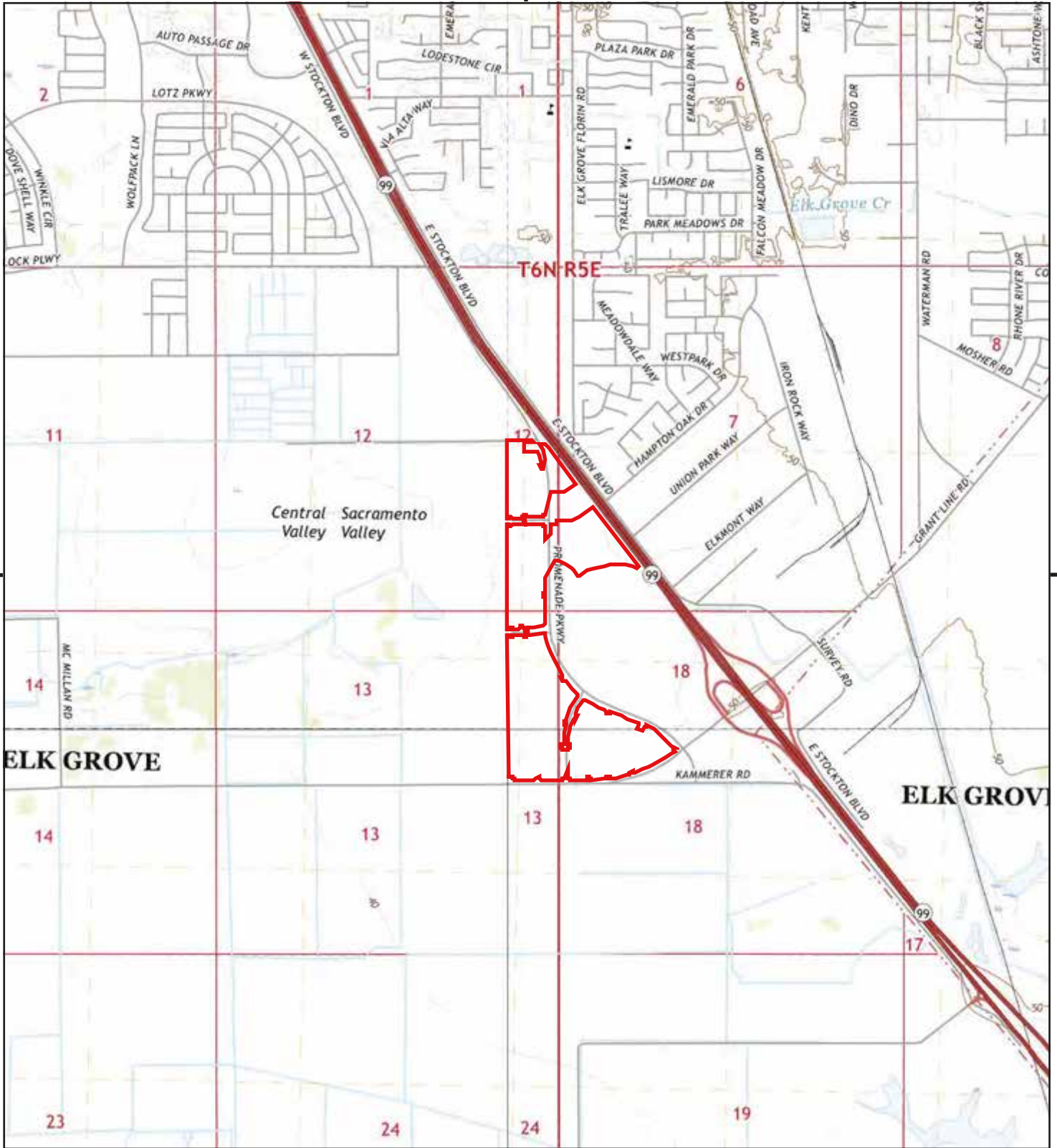


Bruceville
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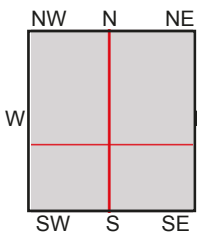
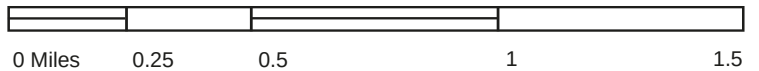
1894 Source Sheets



Lodi
1894
30-minute, 125000



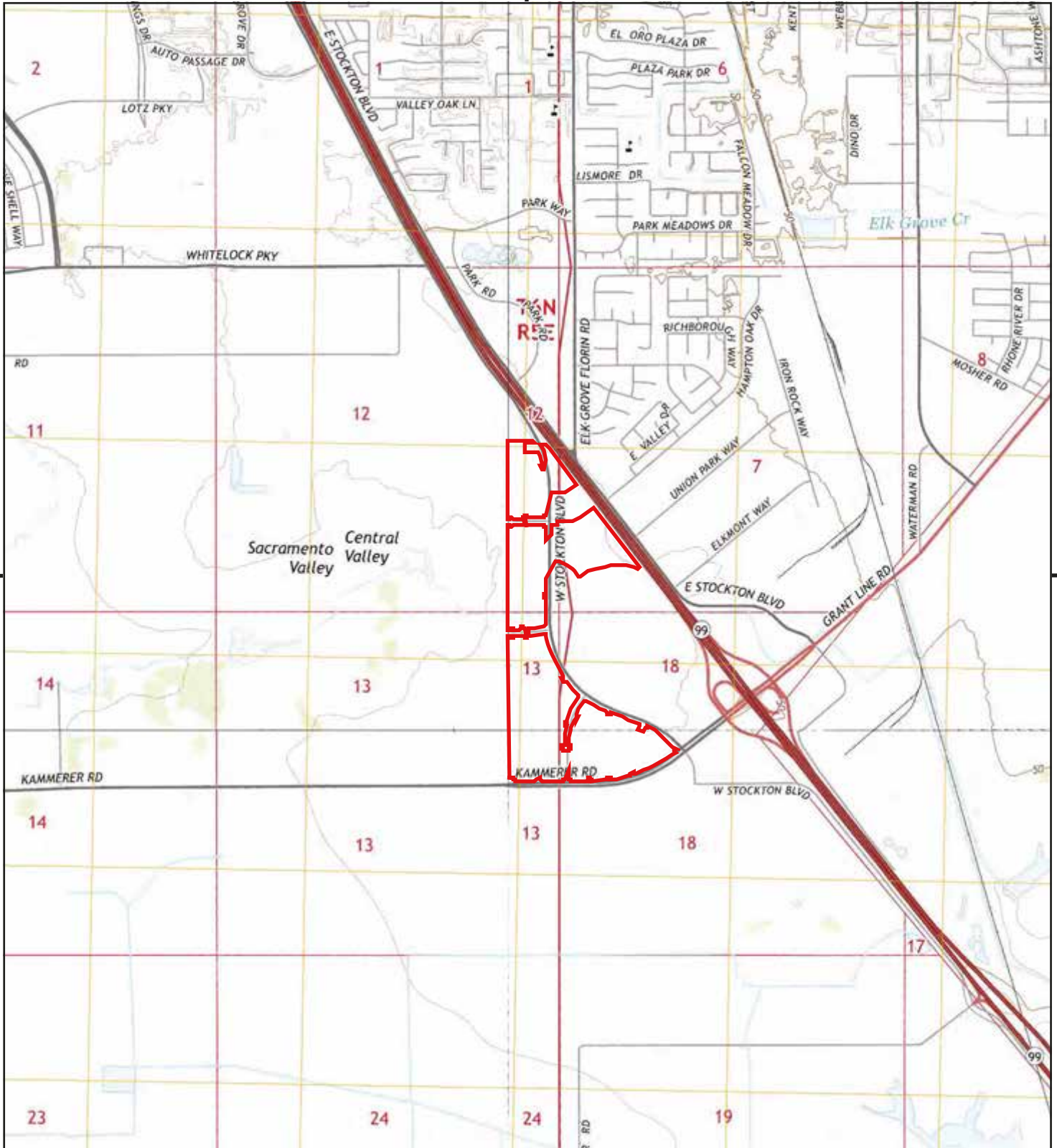
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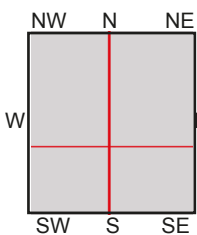
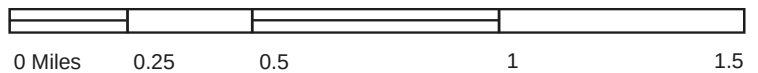
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SW, Bruceville, 2018, 7.5-minute
NW, Florin, 2018, 7.5-minute

SITE NAME: Wilton Elk Grove Parcels
ADDRESS: Promenade Parkway
Elk Grove, CA 95757
CLIENT: Acorn Environmental





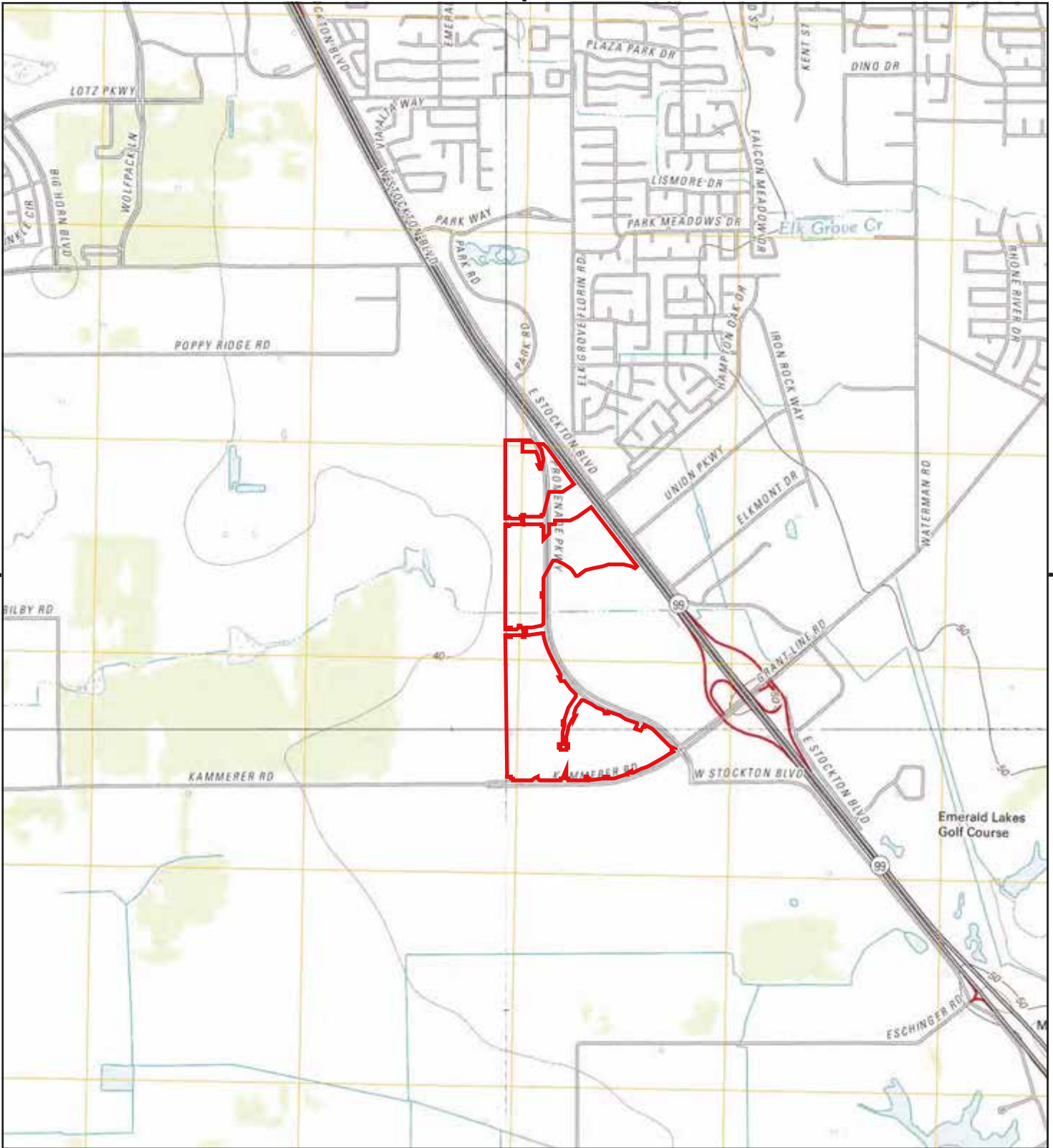
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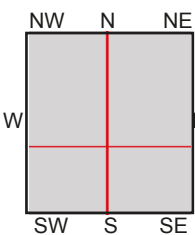
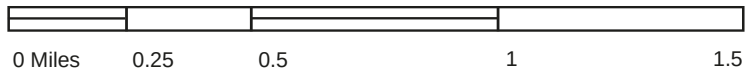
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SITE NAME: Wilton Elk Grove Parcels
ADDRESS: Promenade Parkway
Elk Grove, CA 95757
CLIENT: Acorn Environmental





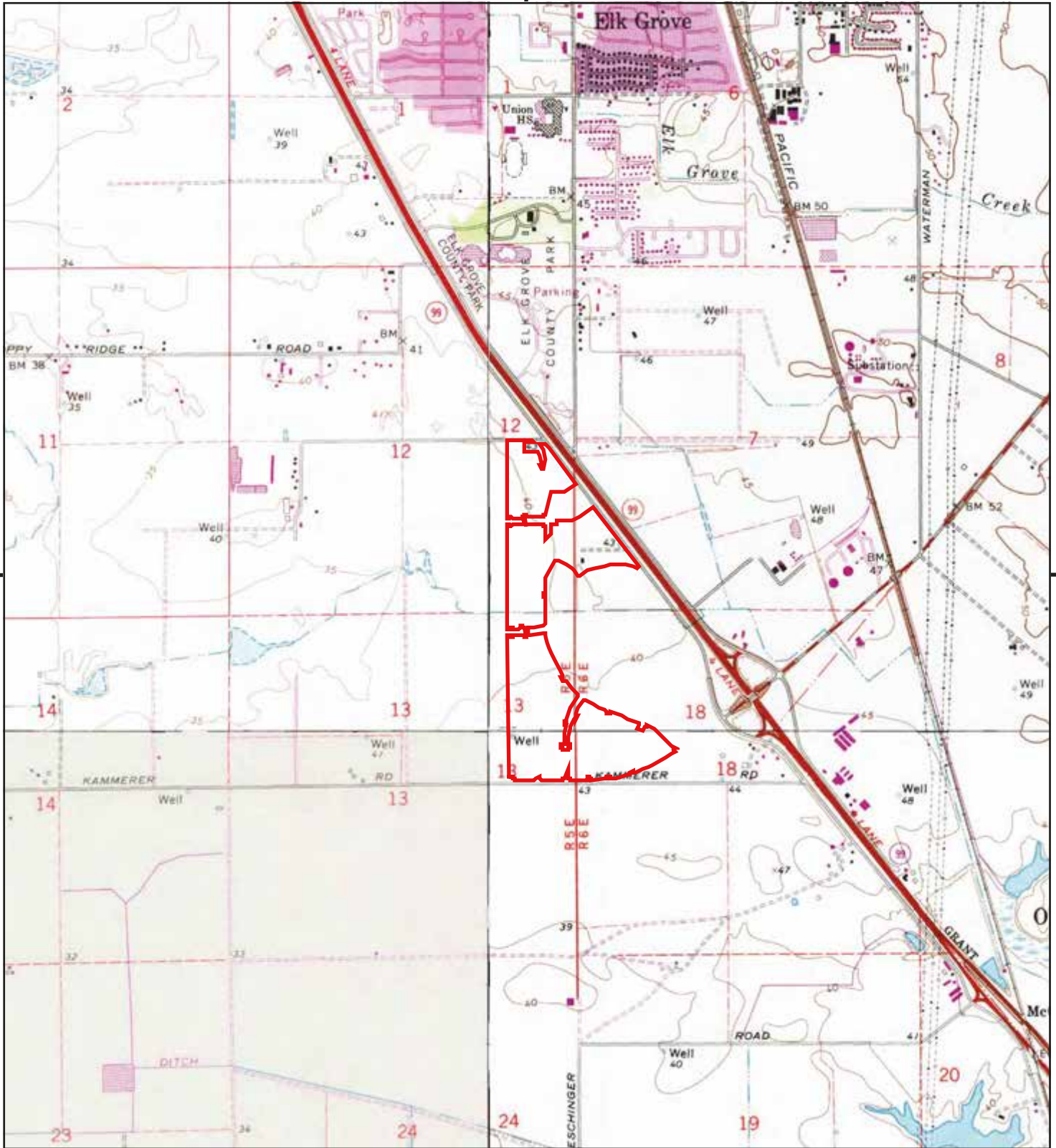
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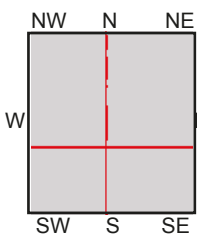
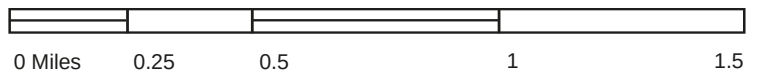
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SITE NAME: Wilton Elk Grove Parcels
ADDRESS: Promenade Parkway
Elk Grove, CA 95757
CLIENT: Acorn Environmental





This report includes information from the following map sheet(s).

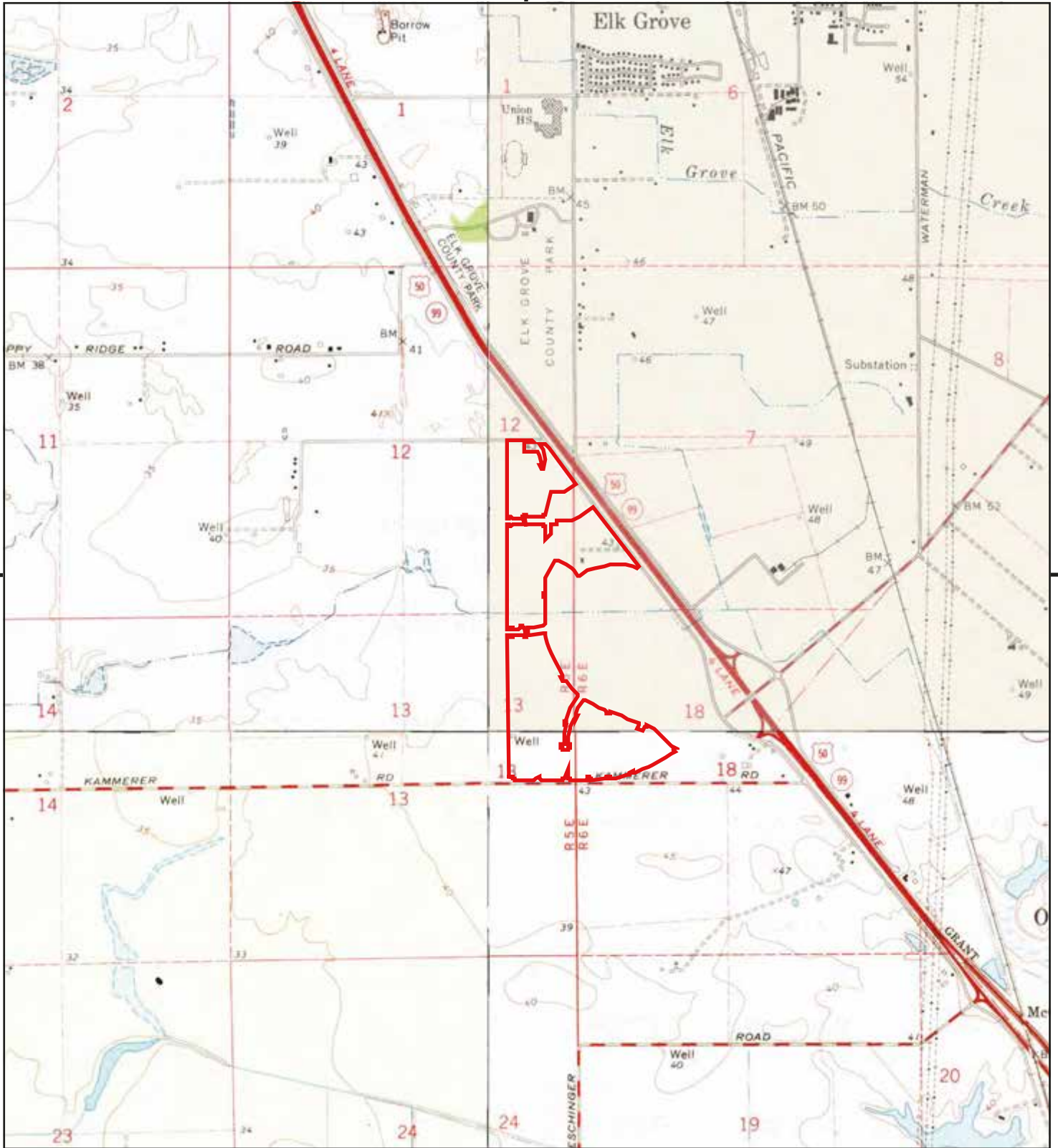


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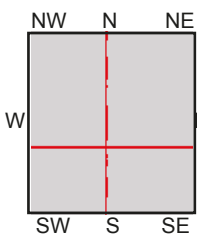
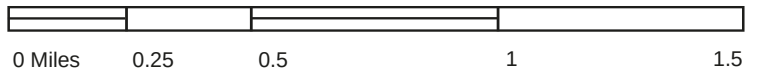
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ADDRESS: Promenade Parkway
Elk Grove, CA 95757
CLIENT: Acorn Environmental







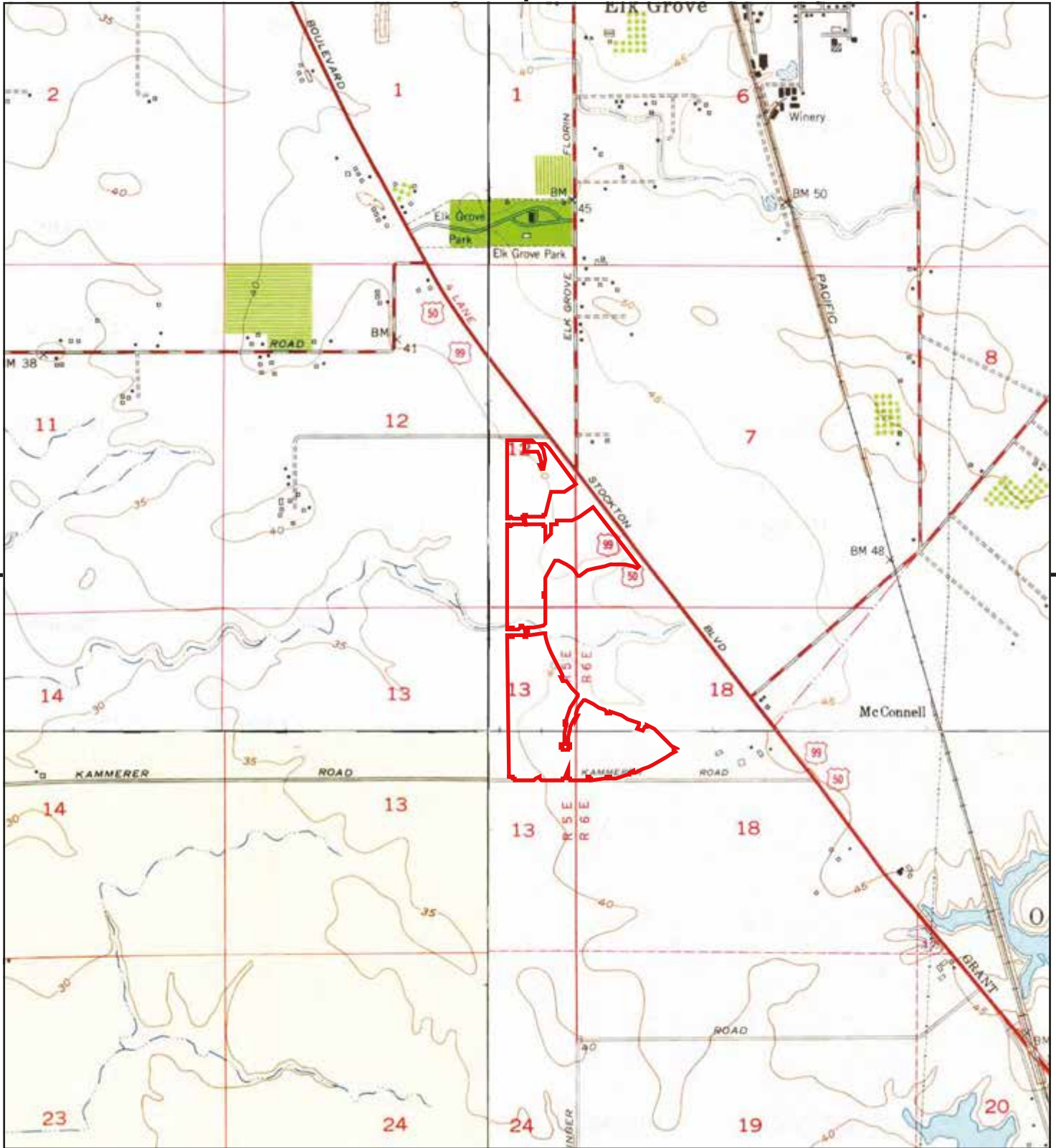
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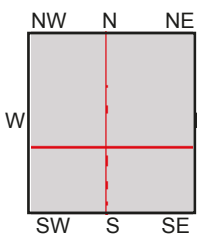
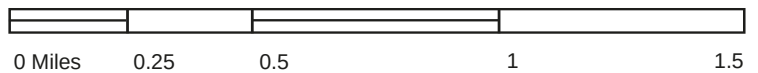
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SITE NAME: Wilton Elk Grove Parcels
ADDRESS: Promenade Parkway
Elk Grove, CA 95757
CLIENT: Acorn Environmental





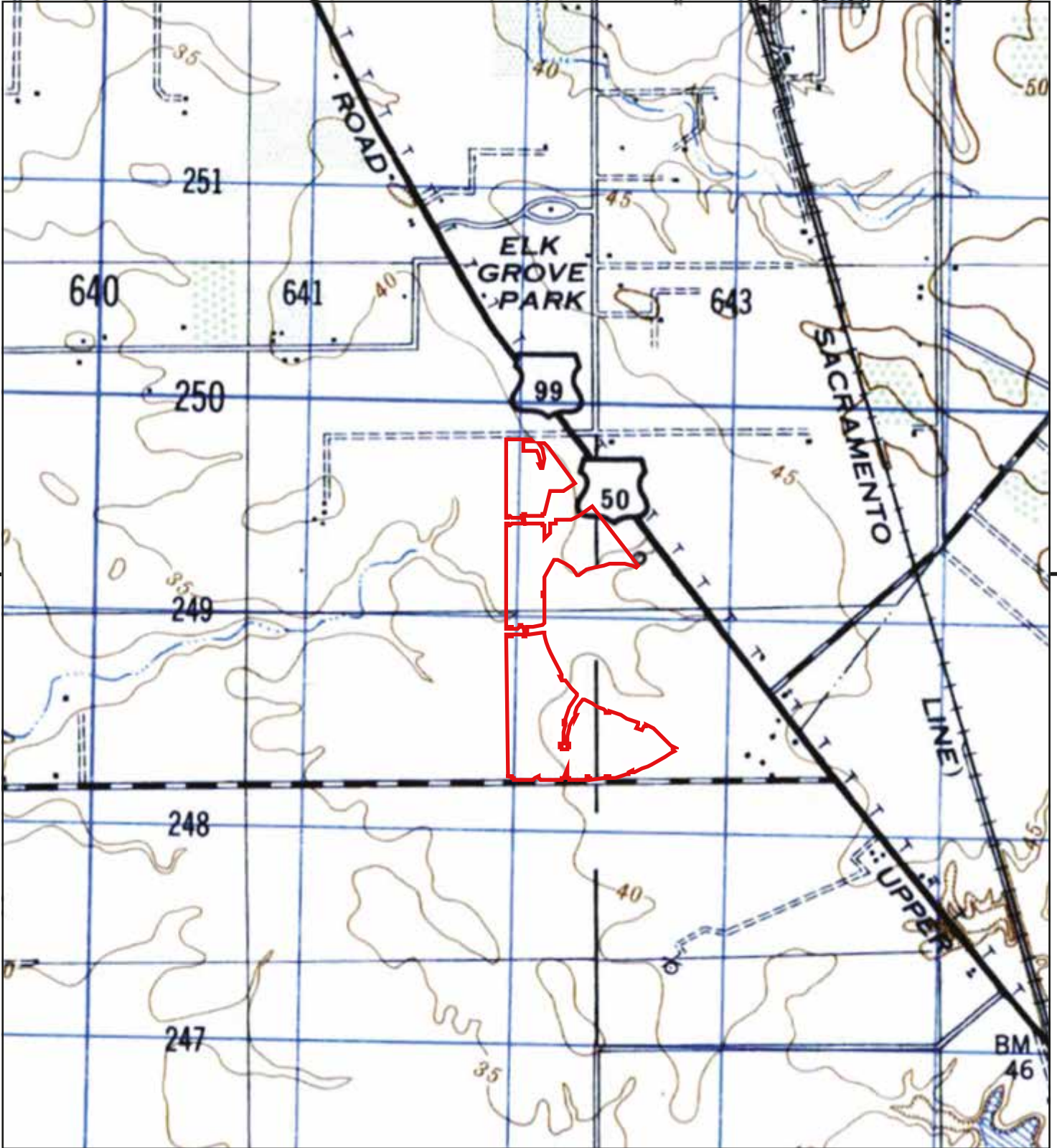
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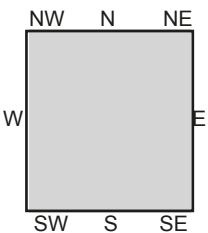
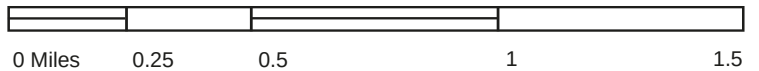
TP, Elk Grove, 1952, 7.5-minute
SE, Galt, 1953, 7.5-minute
SW, Bruceville, 1953, 7.5-minute
NW, Florin, 1953, 7.5-minute

SITE NAME: Wilton Elk Grove Parcels
ADDRESS: Promenade Parkway
Elk Grove, CA 95757
CLIENT: Acorn Environmental





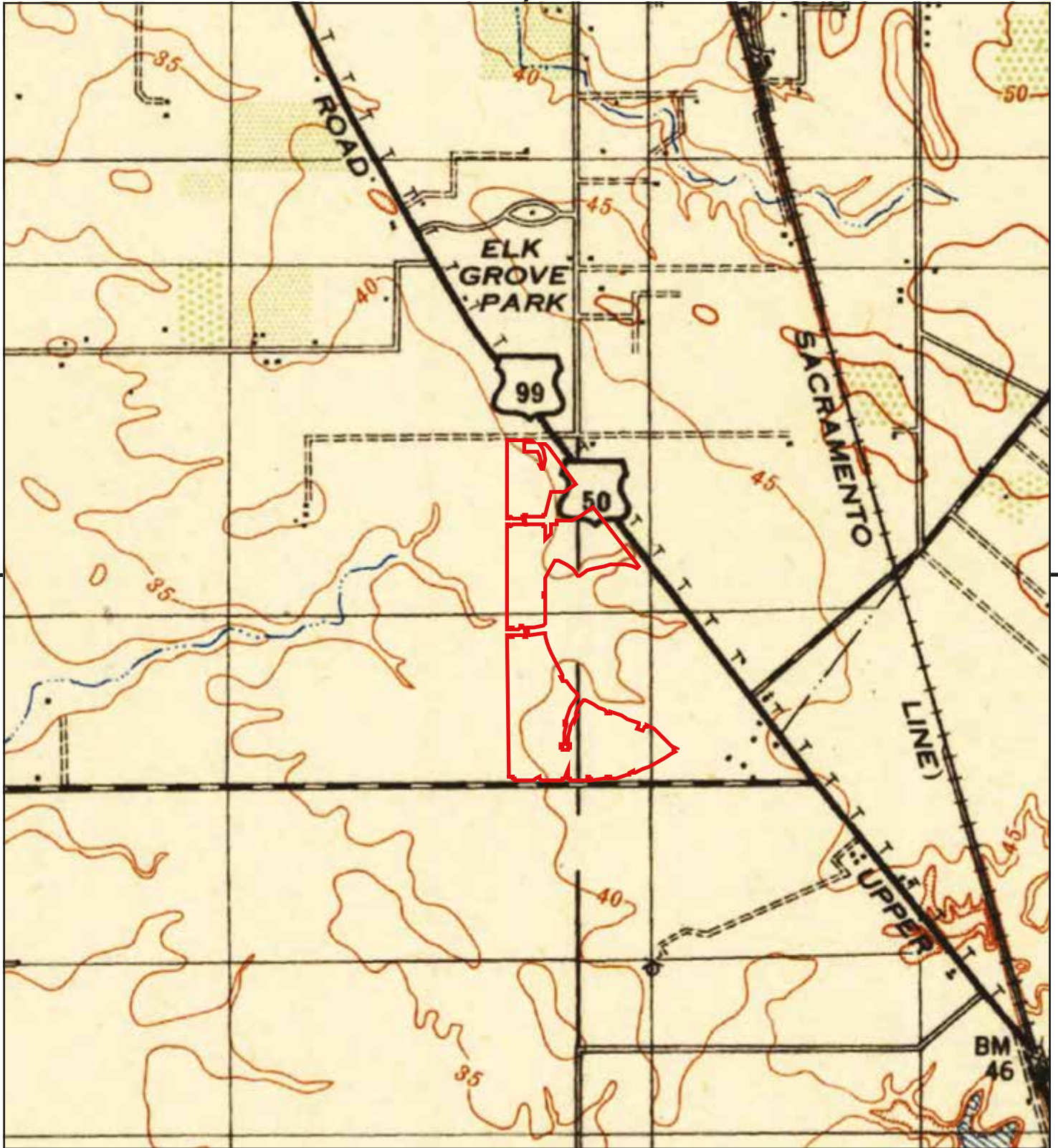
This report includes information from the following map sheet(s).



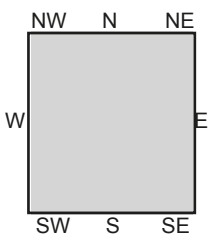
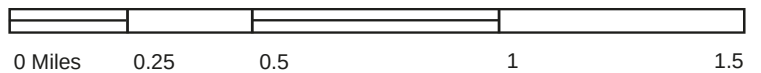
TP, GALT, 1947, 15-minute

SITE NAME: Wilton Elk Grove Parcels
ADDRESS: Promenade Parkway
Elk Grove, CA 95757
CLIENT: Acorn Environmental





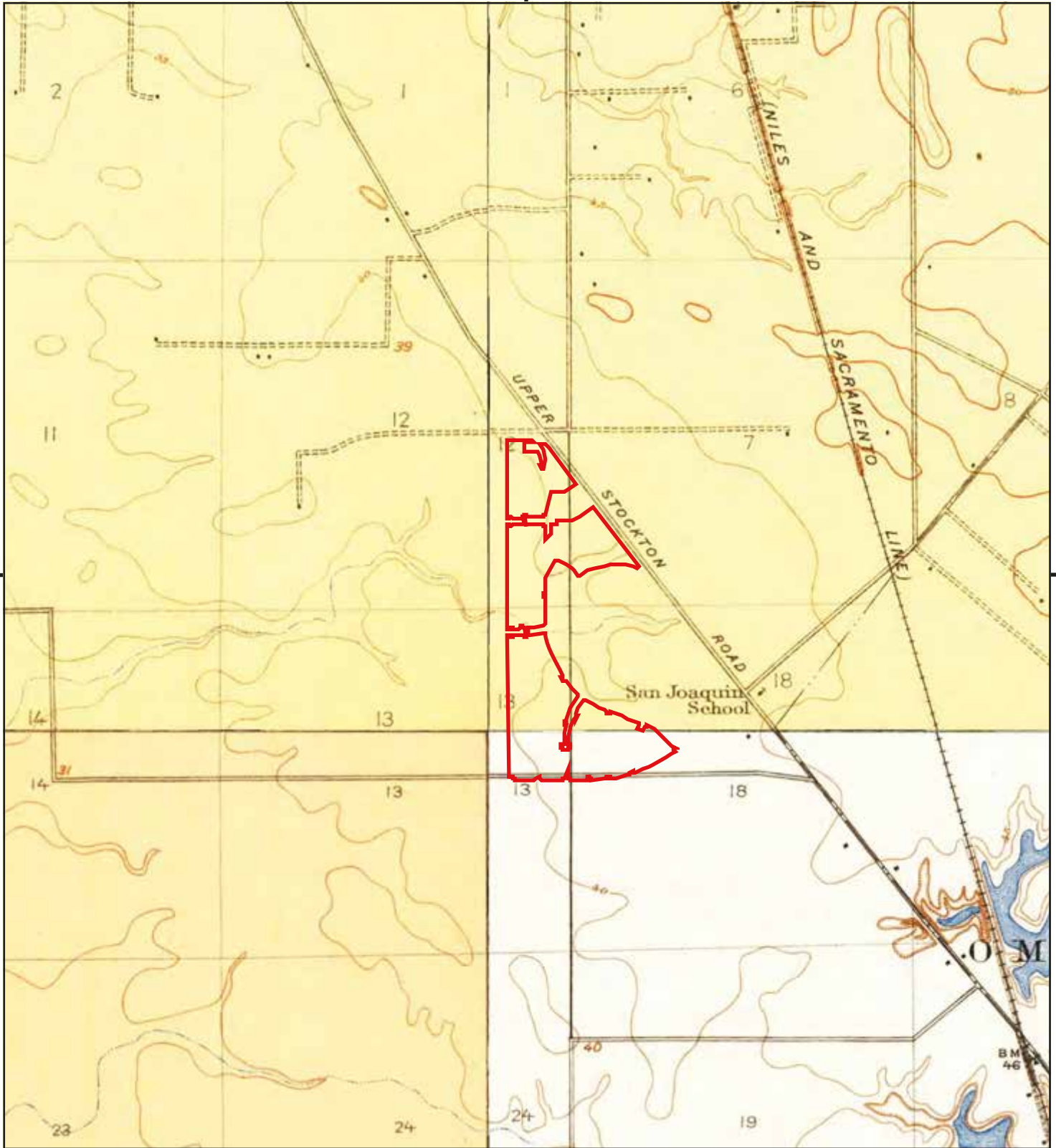
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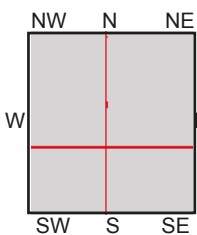
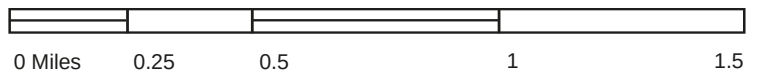
TP, Franklin, 1941, 15-minute

SITE NAME: Wilton Elk Grove Parcels
 ADDRESS: Promenade Parkway
 Elk Grove, CA 95757
 CLIENT: Acorn Environmental





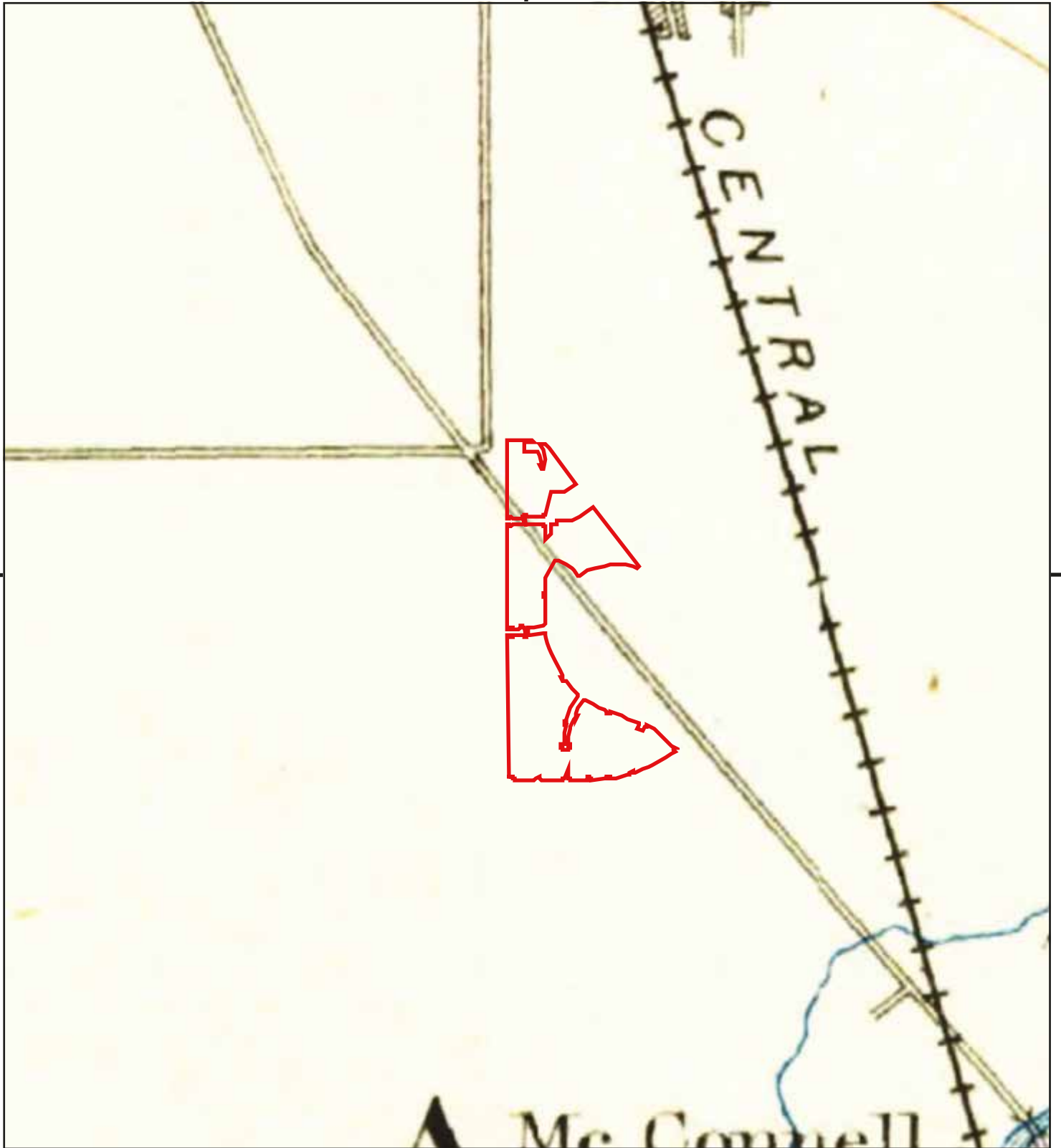
This report includes information from the following map sheet(s).



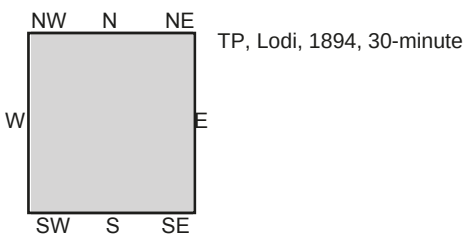
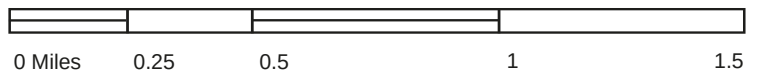
TP, Elk Grove, 1909, 7.5-minute
SE, Galt, 1910, 7.5-minute
SW, Bruceville, 1910, 7.5-minute
NW, Florin, 1909, 7.5-minute

SITE NAME: Wilton Elk Grove Parcels
ADDRESS: Promenade Parkway
Elk Grove, CA 95757
CLIENT: Acorn Environmental





This report includes information from the following map sheet(s).



SITE NAME: Wilton Elk Grove Parcels
ADDRESS: Promenade Parkway
Elk Grove, CA 95757
CLIENT: Acorn Environmental



Appendix D

Certified Sanborn Map Report



Wilton Elk Grove Parcels

Promenade Parkway

Elk Grove, CA 95757

Inquiry Number: 7371624.3

June 22, 2023

Certified Sanborn® Map Report



6 Armstrong Road, 4th floor
Shelton, CT 06484
Toll Free: 800.352.0050
www.edrnet.com

Certified Sanborn® Map Report

06/22/23

Site Name:

Wilton Elk Grove Parcels
Promenade Parkway
Elk Grove, CA 95757
EDR Inquiry # 7371624.3

Client Name:

Acorn Environmental
5170 Golden Foothill Parkway
El Dorado Hills, CA 95762
Contact: David Sawyer



The Sanborn Library has been searched by EDR and maps covering the target property location as provided by Acorn Environmental were identified for the years listed below. The Sanborn Library is the largest, most complete collection of fire insurance maps. The collection includes maps from Sanborn, Bromley, Perris & Browne, Hopkins, Barlow, and others. Only Environmental Data Resources Inc. (EDR) is authorized to grant rights for commercial reproduction of maps by the Sanborn Library LLC, the copyright holder for the collection. Results can be authenticated by visiting www.edrnet.com/sanborn.

The Sanborn Library is continually enhanced with newly identified map archives. This report accesses all maps in the collection as of the day this report was generated.

Certified Sanborn Results:

Certification # 0B95-495C-87AC

PO # 2219

Project Wilton Elk Grove Parcels

UNMAPPED PROPERTY

This report certifies that the complete holdings of the Sanborn Library, LLC collection have been searched based on client supplied target property information, and fire insurance maps covering the target property were not found.



Sanborn® Library search results

Certification #: 0B95-495C-87AC

The Sanborn Library includes more than 1.2 million fire insurance maps from Sanborn, Bromley, Perris & Browne, Hopkins, Barlow and others which track historical property usage in approximately 12,000 American cities and towns. Collections searched:

- ✓ Library of Congress
- ✓ University Publications of America
- ✓ EDR Private Collection

The Sanborn Library LLC Since 1866™

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Appendix E

EDR City Directory

Wilton Elk Grove Parcels

Promenade Parkway
Elk Grove, CA 95757

Inquiry Number: 7371624.5
June 23, 2023

The EDR-City Directory Image Report

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City Directory Images

Thank you for your business.

Please contact EDR at 1-800-352-0050
with any questions or comments.

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EXECUTIVE SUMMARY

DESCRIPTION

Environmental Data Resources, Inc.'s EDR City Directory Report is a screening tool designed to assist environmental professionals in evaluating potential liability on a target property resulting from past activities. EDR's City Directory Report includes a search of available business directory data at approximately five year intervals.

RECORD SOURCES

The EDR City Directory Report accesses a variety of business directory sources, including Haines, InfoUSA, Polk, Cole, Bresser, and Stewart. Listings marked as EDR Digital Archive access Cole and InfoUSA records. The various directory sources enhance and complement each other to provide a more thorough and accurate report.

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RESEARCH SUMMARY

The following research sources were consulted in the preparation of this report. A check mark indicates where information was identified in the source and provided in this report.

<u>Year</u>	<u>Target Street</u>	<u>Cross Street</u>	<u>Source</u>
2020	☒	☒	EDR Digital Archive
2017	☒	☒	Cole Information
2014	☒	☒	Cole Information
2010	☐	☒	Cole Information
2005	☐	☒	Cole Information
2000	☐	☒	Cole Information
1995	☐	☒	Cole Information
1992	☐	☒	Cole Information
1990	☐	☒	Haines Criss-Cross Directory
1986	☐	☒	Haines Criss-Cross Directory
1981	☐	☒	Haines Criss-Cross Directory
1977	☐	☒	Haines Criss-Cross Directory
1971	☐	☒	Haines Criss-Cross Directory

FINDINGS

TARGET PROPERTY STREET

Promenade Parkway
Elk Grove, CA 95757

<u>Year</u>	<u>CD Image</u>	<u>Source</u>
-------------	-----------------	---------------

POMENADE PKWY

1990	-	Haines Criss-Cross Directory	Street not listed in Source
1986	-	Haines Criss-Cross Directory	Street not listed in Source
1981	-	Haines Criss-Cross Directory	Street not listed in Source
1977	-	Haines Criss-Cross Directory	Street not listed in Source
1971	-	Haines Criss-Cross Directory	Street not listed in Source

PROMENADE PKWY

2020	pg A2	EDR Digital Archive	
2017	pg A4	Cole Information	
2014	pg A6	Cole Information	
2010	-	Cole Information	Street not listed in Source
2005	-	Cole Information	Street not listed in Source
2000	-	Cole Information	Street not listed in Source
1995	-	Cole Information	Street not listed in Source
1992	-	Cole Information	Street not listed in Source

FINDINGS

CROSS STREETS

<u>Year</u>	<u>CD Image</u>	<u>Source</u>
-------------	-----------------	---------------

KAMMERER RD

2020	pg. A1	EDR Digital Archive
2017	pg. A3	Cole Information
2014	pg. A5	Cole Information
2010	pg. A7	Cole Information
2005	pg. A8	Cole Information
2000	pg. A9	Cole Information
1995	pg. A10	Cole Information
1992	pg. A11	Cole Information
1990	pg. A12	Haines Criss-Cross Directory
1986	pg. A13	Haines Criss-Cross Directory
1981	pg. A14	Haines Criss-Cross Directory
1977	pg. A15	Haines Criss-Cross Directory
1971	pg. A16	Haines Criss-Cross Directory

City Directory Images

KAMMERER RD 2020

8499 PAULA HARDESTY
SHELBY HARDESTY

PROMENADE PKWY 2020

10305 ALFRED MORIN
ANH NGUYEN
BASSAM ALNABWANI
BEATRICE IMMOOS
DENISE BRADLEY
ELIZABETH HAMMEL
FAIYAZ BUKSH
HISHAM AWADALLA
JACKIE SCROGGINS
JANINE BERA
JAY RAJCS
JENNIFER TORRES
JENNIFER WULSIN
JILL MEYER
JOHN SOLANO
KAISER ABELEDA
KRISTEN MATTIS
LINDSEY WARFIELD
MARVIN MISLANG
NAVJOT BISLA
NEWYORICANPURE CARMEN
PAMMY JANDA
ROBYN HESTER-KLEIN
ROSALINDA SEIPLER
RUMANA AHMED
TERIA DAWSON
VALARIE YAGEN

KAMMERER RD 2017

8279 SHERGILL, SATPAL S

PROMENADE PKWY 2017

10465 THE HOWARD HUGHES CORPORATION

KAMMERER RD 2014

8675 HARDESTY, GREG

PROMENADE PKWY 2014

10465 OCCUPANT UNKNOWN,

KAMMERER RD 2010

8499 HARDESTY, PAULA A

KAMMERER RD 2005

8499 HARDESTY, PAULA A

KAMMERER RD 2000

8499 HARDESTY, PAULA A

KAMMERER RD 1995

8675 OCCUPANT UNKNOWNN

KAMMERER RD 1992

8675 WIETSMA, HARRY

KAMMERER RD 1990

8250	XXXX	00
8499	XXXX	00
8675	WIETSMA Harry	684-2822 8
★	0 BUS	14 RES 2 NEW

KAMMERER RD 1986

8215	WATSON URA	685-9478	2
8250	XXXX	00	
8499	XXXX	00	
NO #	WIETSMA HARRY	685-6040	+ 6
★	0 BUS	14 RES	3 NEW

KAMMERER RD 1981

8158	BUECHLER RODELL	685-3804	7
8250	XXXX	00	
8499	WIETSMA JOHN	685-9411	9
NO #	OVERLEY DEE L	685-3514	
NO #	PARKER JOHN E	685-5022	+1
★	0 BUS	11 RES	2 NEW

KAMMERER RD 1977

8098	XXXX	00
8158	BUECHLER ROOELL	685-3804+7
8250	RAU JOHN	685-9652 5
NO #	GAGE STANLEY J	685-3075 4
NO #	OVERLEY DEE L	685-3514
NO #	WOLFF ALFRED	685-4907
*	0 BUS 9 RES	1 NEW

KAMMERER RD 1971

KAMMERER RD 95624 ELK GROVE

NO	#	ALOERSON WILLIAM	8	685-4830
NO	#	BALLIET JAMES F		685-3127
NO	#	BROOKS C S		685-4162+1
NO	#	KAMMERER OON		685-3319
NO	#	KLINE EARL		685-9763
NO	#	OVERLEY OEE L		685-3514
NO	#	PARKER WAYLENE		685-3289
NO	#	RAU JOHN		685-9652
NO	#	WOLFF ALFREO		685-4907
	*	0 BUS	9 RES	1 NEW

Appendix F

Site Reconnaissance – Photo Log

Site Photographs



Utility box within easement adjacent to internal roadways (Promenade Parkway facing east).



Barren field after recent grain harvest. Facing Sky River Casino (south).



Capped well. APN 134-1030-008



Deteriorated asphalt strip. Located in the area of historic airstrip.



Household waste on bridge above Stormwater Basin in APN 134-1010-0005



SMUD Substation north of Subject Property.



Deteriorated electrical pole. APN 134-1030-008



Capped well. APN 134-1030-008



Barren field after recent grain harvest. Along northern Subject Property boundary (south).



Barren field after recent grain harvest. Facing residential development (west).



Stormwater Basin in APN 134-1010-0005. Looking east



Barren field after recent grain harvest. Facing Kammerer Road (south).

Appendix G

Resumes



RYAN SAWYER, AICP

PRINCIPAL | PROJECT DIRECTOR

Ryan Sawyer is a Project Director with 17 years of experience preparing environmental analysis reports in compliance with National Environmental Policy Act (NEPA), ASTM E-1527, and related environmental laws and regulations. Ms. Sawyer specializes in the preparation of environmental studies for Native American tribal governments, and in particular, the preparation of NEPA compliance documents for fee-to-trust economic development projects. Her knowledge of NEPA, BIA NEPA procedures, and the expectations of staff at the BIA Regional Offices has led to a successful fee-to-trust outcome for many of her clients, including but not limited to the Table Mountain Rancheria, Tule River Tribe, Redding Rancheria and others.

YEARS OF EXPERIENCE

Over 17 Years

EDUCATION

University of California, Santa

Barbara; Bachelor of Arts

Major in Environmental Studies
and Geography

KEY QUALIFICATIONS

- Meets the definition of an Environmental Professional per DOI Regulations
- Led the preparation of environmental documents for more than 30 Native American Tribes, various federal, state, and local agencies, and private developers across the United States.

CERTIFICATIONS

- American Institute Certified Planners (AICP)

RELEVANT PROJECT EXPERIENCE

Ms. Sawyer currently serves as Project Director on various NEPA documents:

- Confidential Fee-to-Trust Development Project EIS and Phase I, WA
- Confidential Fee-to-Trust Tribal Government and Mixed-Use Non-Gaming Project EA, WA
- Confidential Fee-to-Trust Project EA, northern CA
- Table Mountain Rancheria, Various Fee-to-trust Projects and Phase Is, Categorical Exclusions, Fresno County, CA
- Redding Rancheria Fee-to-Trust Project EIS and Phase I, Redding CA
- Spokane Tribe of Indians Fee-Trust Project Categorical Exclusion and Phase I, WA

Prior to the formation of Acorn Environmental, Ms. Sawyer served as the primary author and project manager for more than 100 environmental impact analysis and compliance projects, including, but not limited to, the following:

- Tule River Tribe FTT Project EIS and Phase I, Porterville, CA
- Tule River Tribe FTT Housing Project EA, Tulare County, CA
- Chicken Ranch Rancheria FTT Projects (various), CA
- San Pasqual FTT Projects (various), CA
- Pauma Band 65-acre FTT Project, CA
- Tachi-Yokut Tribe FTT Projects (various), CA
- Chickasaw Nation FTT EA, Carter County, OK
- Chickasaw Nation FTT EA, Marshall County, OK
- Ho-Chunk Beloit FTT EIS, City of Beloit, WI
- Muckleshoot Emerald Downs Fee-to-trust EA, Kings County, WA



Appendix H

2005 Phase I ESA – Rainey Geotechnical
(Available Upon Request)