28th Streets. All new water lines installed by SMCS would be sized and designed to meet City code requirements. New public fire hydrants would be constructed at the mid-block of every frontage street. (DEIR, p. 2-39.)

Combined Sewer System (CSS)

The City's CSS located in the alley behind the Buhler Building and the Old Tavern building is currently leaking and presents a potential health and safety issue. To address this issue, SMCS has received ministerial approval from the City to install a new 12-inch lateral from the alley south along 28th Street to Capitol Avenue, then east to 29th Street. This work is separate from the SMCS Project in order to correct an existing problem. This relocated combined sewer would connect to the proposed 78-inch combined sewer to be constructed by the City in 29th Street. A new 12-inch combined sewer would be constructed in 28th Street from the alley north of N Street south to N Street. This sewer would serve existing buildings (Monkey Bar, Café Bernardo's and Capitol Physical Therapy). (DEIR, p. 2-39.)

Dry Utilities

Dry utilities, such as electricity, cable television, and communications, would be relocated as part of the alley/utility abandonments and proposed building construction to accommodate the SMCS Project. New utility vaults would be located in 28th Street near the entrance to the alley. The utility vaults would be designed to meet City code requirements. Installation of these utility vaults could require the removal of two trees. The location and designs for the dry utilities would be approved by the applicable utility company and coordinated with the design/build team. A "Joint Trench" Plan would be submitted to the City for approval. Utilities currently installed over-head in the alleys would be relocated underground in the streets. (DEIR, pp. 2-39 – 2.40.)

Other Enhancements and Street Improvements

As part of the SMCS Project, existing street curb, gutters, and sidewalks adjacent to new structures and site parking would be reconstructed to meet current City of Sacramento standards. In general, existing streets and related curbs, gutters, and sidewalks not affected by construction and not damaged during construction, would not be repaired or replaced. (DEIR, p. 2-40.)

The streetscape within the SMCS Project area would also be enhanced. Streetscape features could include decorative paving, landscaping, and lighting upgrades, as well as improved way-finding signage and circulation assistance. Pedestrian street level circulation and other improvements are proposed along 28th Street between Capitol Avenue and L Street. Signage would be designed to meet the requirements set forth in the City's Midtown Signage program. (DEIR, p. 2-40.)

Landscaping/Lighting/Signage

Landscaping

Landscaping around the WCC would include trees, shrubs, and other plantings. Along L Street, some existing trees would need to be removed to accommodate the new building. Along Capitol

Avenue, some trees would need to be removed to accommodate the new building and SMUD utility vaults. Along 29th Street, small trees would need to be removed. As shown in Figure 2-22, new trees would be planted along Capitol Avenue and 29th Street. (DEIR, p. 2-40.)

To accommodate construction of the SMF Building, two palm trees along 28th Street may need to be relocated within the overall project area subject to approval by the City arborist. New trees would be planted along L Street and 28th Street (see Figure 2-22). (DEIR, p. 2-40.)

Along the Buhler Building some of the existing Lombardy Poplar trees would be removed along L Street and 28th Street. New trees would be planted along L Street. (DEIR, p. 2-40.)

At this time, all existing trees adjacent to the Future MOB would be retained. (DEIR, p. 2-40.) A total of six City designated Heritage trees are located within the project area. Some of these trees may need to be removed due to the health of the existing trees and/or construction of the SMF Building and Energy Center (DEIR, p. 2-40.)

Lighting

New street lights proposed within the SMCS Project area would conform to the City's lighting standards. New street lights are proposed around each of the new project components. The lights would be spaced approximately 70–80 feet apart. At this time it is anticipated streetlights would be the acorn style lights found throughout the city. (DEIR, p. 2-42.)

Signage

Proposed signage for the SMCS Project includes skyline, monument/directional, parking identification and building identification. The skyline signs would be located at the skyline level on the east and west sides of the WCC (see Figures 2-7 and 2-9) and the east side of the existing SGH. The signs would be approximately 5-feet tall by 100-feet long and would be illuminated. The monument signs would identify the SMCS complex buildings and would be located at major street intersections. The signs would be approximately 10-feet tall by 5-feet wide with information displayed on four sides. These signs would also be illuminated. The directional signs would be pole mounted and would be located at driveway entrances. The parking identification signs would identify parking areas for patients, visitors, and staff. Building identification signs are building mounted signs proposed at first floor levels to identify specific buildings. These signs would be approximately 12 to 24 inches tall and would include the specific building name and street address. (DEIR, p. 2-42.)

Other design elements include decorative paving and other streetscape amenities. Lighting and way finding would be consistent with the City's policies to promote safe vehicle and pedestrian access and egress into and within the SMCS complex. (DEIR, p. 2-42.)

SMCS Project - Circulation and Parking

SMCS Vehicular Circulation

The main regional vehicular access to the SMCS medical complex would continue to be via Capital City Freeway and 29th Street. Local access to the medical complex and throughout the area is provided via L Street, Capitol Avenue, N Street, K Street, 26th, 27th, 28th, and 29th Streets. Section 6.7, Transportation and Circulation, also addresses the potential conversion of L Street between 16th Street and 29th Street from one-way to two-way traffic, a project currently proposed by the City as part of the City's Two-Way Conversion Project. (DEIR, p. 2-42.)

To access SGH, Buhler Building, and the WCC, heading south on 29th Street, visitors/patients would have the option to either self-park in the public parking lot (south lot) under the freeway or be dropped off at the main hospital entrance (WCC) and have their vehicle valet parked. Pedestrian access to the WCC would be via a pedestrian bridge over 29th Street connecting the public parking lot (south lot) to the WCC. Once inside the WCC, signs would direct visitors/patients to SGH, Buhler Building or the SMF Building, which would all be connected via pedestrian bridges on the second level. Hospital staff would be directed to park in the north lot under the freeway or the Community Parking Structure. Access to the SMF Building would be similar to the WCC. Vehicles would access the SMF Building via Capitol Avenue. Visitors/patients would either be directed south on 28th Street to self-park in the Community Parking Structure or be dropped off at the main entrance to the SMF Building where vehicles would be valet parked in the Community Parking Structure. (DEIR, p. 2-42.)

Ambulance access to SGH would remain on 29th Street, while general (ambulatory) emergency access would be via the modified existing public drop off along the north side of L Street into SGH. No emergency access is planned for the new WCC. (DEIR, p. 2-43.)

Delivery service access to SGH, the new SMF Building, the new WCC, and the Buhler Building would remain off L Street. SMCS currently receives frequent deliveries into the existing basement loading docks under SGH with a total of ten to fifteen deliveries per day. This existing loading dock has several design limitations that would be corrected to allow for deliveries from smaller trucks that would transfer goods from the recently established off-site warehouse, which receives the majority of deliveries. (DEIR, p. 2-43.)

Existing bicycle cages and bike racks are located in the north and south parking lots under the freeway and these facilities are proposed to remain. In addition, bike racks would also be provided at the Community Parking Structure. A Transportation Systems Management Plan (TSMP) has been prepared and approved by the City as part of this project (see Section 6.7, Transportation and Circulation for details). In addition, SMCS has recently implemented a free shuttle service for employees and staff from SGH and the Buhler Building to the light rail station located at 29th and R Streets. This shuttle service is also available to the general public. After several months of operation, the shuttle service has gradually been increasing ridership and is becoming more widely known and used by SMCS employees. (DEIR, p. 2-43.)

SMCS Parking

Current available parking to serve the existing SGH, Buhler Building, and adjacent office buildings is shown below in Table 2-4. Table 2-5 identifies new parking to be provided as part of the SMCS Project. Parking for the WCC would be provided at either the north lot under the freeway for hospital staff or in the south lot under the freeway for visitors and patients. A pedestrian bridge would connect the south lot to the WCC. SMCS would also provide valet parking for patients arriving at the WCC. A total of approximately 54 spaces in the SMF Building would be dedicated doctor parking along with approximately 80 spaces in the north lot under the freeway. (DEIR, p. 2-43.)

Parking for the SMF Building would be provided in the Community Parking Structure. As will be the case with the WCC, SMCS would provide a valet parking program for patients visiting the SMF Building. Under an agreement with Pioneer Church, a total of 36 parking spaces under the SMF Building would be allocated for employees of Pioneer Church for use during the week while all 90 spaces would be available for church patrons during weekend services. The remaining 54 spaces under the SMF Building would be reserved for doctor parking. (DEIR, p. 2-43.)

Parking to serve the new commercial/retail uses to be constructed adjacent to the Community Parking Structure would be provided in the Community Parking Structure. Under an agreement with Trinity Cathedral, a total of 25 parking spaces would be allocated for employees of Trinity Cathedral for use during the week. Staff of the proposed Children's Theatre of California would also have access to 60 spaces for use during the day once the Theatre is constructed (DEIR, p. 2-43.)

Parking to serve the proposed residential units would be provided in the approximately 40 spaces to be provided on-site. (DEIR, p. 2-45.)

Parking for the Future MOB would be in the 35 spaces proposed below grade as well as in the Community Parking Structure. (DEIR, p. 2-45.)

Table 2-6 provides an overview of the net difference in parking to be provided by the SMCS Project. The existing 249-space St. Luke's parking structure is not counted towards existing parking because a majority of the structure is not available for parking. The upper two floors are closed due to safety concerns and therefore not available. The first level is used for parking during the week where only a small number of cars have been observed. For all practical purposes, the garage is not available for parking and is therefore not considered part of the existing parking supply. As shown in Table 2-6, a total of 890 net new parking spaces would be provided. (DEIR, p. 2-45.)

The City of Sacramento has established a 35 percent alternative transit mode goal that requires all new development that employs over 25 employees prepare a Transportation Systems Management (TSM) Plan (Ordinance 88-082). The City-required TSM Plan is required to establish specific measures designed to promote alternate commute modes to reduce the total number of vehicle trips associated with commuting. Reducing the number of automobile trips is an important component to help improve air quality, minimize traffic congestion on area roadways, and reduce parking demand. (DEIR, p. 2-45.)

As part of the SMCS Project, a TSM and Parking Demand Management program has been designed to ensure adequate parking is provided to serve the population of all the SMCS Project components including patients, visitors, and employees. (DEIR, p. 2-46.)

SMCS TSM and Parking Demand Management Program

The key elements of the TSM and Parking Demand Management program are described below. (DEIR, p. 2-46.)

Existing and Proposed TSM/Parking Demand Management Measures

Previous Alternative Commute Program Elements

SMCS, which includes Sutter Memorial Hospital, SGH, and the Buhler Building, currently implements an Alternative Commute Program. At the time the SMCS buildings were constructed the City did not have a TSM requirement. The current Alternative Commute Program includes the following program elements:

Free carpool parking (for SMCS employees who carpool together);

Free occasional parking for those who are full-time alternative commuters;

Free Compressed Natural Gas (CNG) shuttle program (connecting with SGH and the 29th Street light rail station and SGH and Sutter Memorial Hospital);

Multiple transportation kiosks (schedules, maps, resources, commute information);

Employee orientation presentations;

SMCS Commute Program web page;

SMCS Employee Rideshare tri-fold brochure;

SMCS Commute Program Quick Reference Guide for all departments;

Monthly articles in Sutter Insights employee newsletter;

Participate with SMCS Wellness Fair and annual Benefits Program.

(DEIR, p. 2-46.)

City-Required SMCS TSM Plan

In compliance with Ordinance 88-082, SMCS prepared a TSM Plan for the SMCS Project. The City approved the most recent version of the SMCS TSM Plan in April 2005. The current TSM

Plan is designed to encourage other modes of travel including transit, carpools, bicycling and walking thereby reducing the number of automobile trips. The following commute program elements were designated as TSM measures in the TSM Plan required by the City listed below:

Half-time designated, on-site Employee Transportation Coordinator (ETC);

Membership in Sacramento Transportation Management Association (TMA);

50% subsidy for transit users (Sacramento Regional Transit, Roseville Transit, Capitol Corridor, Yuba-Sutter Transit, San Joaquin Transit, El Dorado Transit, Yolo Transportation, Fairfield/Suisun Transit, Amador Regional Transit, Galt Transit, etc.);

On-site Transit pass and vanpool vouchers sales at Cashiers Office;

50% subsidy for vanpool participants;

Class I and II bicycle facilities;

Showers and clothes lockers;

Personal Matching Assistance (via www.sacregion511.org and SMCS ETC) for carpool/vanpool and bicycle partner matching;

Flextime;

Designated carpool/vanpool parking spaces;

Preferential carpool/vanpool parking locations;

Guaranteed Ride Home program; and

On-site amenities (ATM banking, fitness facilities, cafeteria and food vending services, sundry/gift shop, etc.).

(DEIR, p. 2-47.)

<u>Additional TSM/Parking Demand Management Program Elements Added for the Proposed Project</u>

Additional measures included in the TSM Plan to be implemented after project completion:

75% monthly transit or vanpool subsidy (up to $100 per month) to provide greater subsidies for regional transit and vanpool users (increased from 50%);

Class I bicycle lockers – 24 lockers provided in north lot and 7 lockers in Community Parking Structure;

Class II bicycle racks – 31 racks at entrances of WCC, SMF Building and Community Parking Structure;

Showers and lockers – 11 showers and 136 clothes lockers;

Preferential Parking – designate 10% (62 spaces) for carpool/vanpool/cleaner fuel vehicles; and

Annual Employee Commute Survey – one year after occupancy.

(DEIR, pp. 2-47 – 2-48.)

Potential Future TSM/Parking Demand Management Enhancements

Additional TSM measures, listed below, would also be available to incorporate into the project as the SMCS Project builds out. These additional measures would be added to the TSM Plan if it is determined, through the annual monitoring program, that further steps are required to reduce vehicle trips to either meet the City's 35 percent alternative mode requirement or to reduce parking demand in order to meet available parking supply.

75% monthly transit or vanpool subsidy (up to $100) – to provide greater subsidies for regional transit and vanpool users;

Monthly Cash Commute Alternative Allowance (bicyclists, walkers, roller blades, scooters, etc.);

Periodic (quarterly) financial incentives or prizes for active alternative commuters (walking shoes, bicycle gear, tune-ups, movie tickets, etc.);

Adjust/increase parking rates to be flexible and competitive with other hospital market rates;

Develop electronic in-house ride-matching service for employees to carpool with other employees. Electronic kiosks to be placed at Transportation Information Boards;

Track shuttle riders via driver-provided punch cards and offer cafeteria, café, coffee, cookie or other on-site discount for every 10th shuttle trip;

On-site annual comprehensive Transportation (Spare the Air) Fair; and

Allow per diem employees to participate in 75% (up to $100 per month) transit pass program;

Provide community telephone hotline for transportation and parking issues.

(DEIR, p. 2-48.)

SMCS TSM Monitoring and Reporting Program

The SMCS TSM/Parking Demand Management Monitoring and Reporting program includes annual monitoring and reporting to track program success. An Annual Monitoring Report will be submitted to the City by SMCS each year. The first Annual Monitoring Report will be submitted to the City within 6 months of project approval. The Annual Monitoring Report will be made available for public review through the City of Sacramento, and through the City and SMCS websites. (DEIR, p. 2-48.)

The monitoring program will be designed to provide information that will help improve and fine tune the TSM/Parking Demand Management measures and will demonstrate to the City and the community the effectiveness of it's the SMCS TSM/Parking Demand Management program. One of the primary goals of the TSM program is to ensure that available parking is provided for users of the SMCS Project components. The monitoring program will document the project-related parking demand, available parking in SMCS parking lots, and participation of employees in the TSM Plan. The monitoring program will include the following elements: (DEIR, p. 2-49.)

SMCS will monitor and report the total SMCS daytime population, including employees, patients, visitors, vendors, etc. that access SMCS facilities;

SMCS will monitor and report the available parking supply; and

SMCS will monitor and report the project parking demand and employee participation in the TSM/Parking Demand Management program (e.g., transit passes, use of van pools and car pools, etc.).

(DEIR, p. 2-49.)

Parking Resolution

If through the monitoring program it is determined that the SMCS Project demand exceeds available supply of parking, measures will be implemented by SMCS to reduce demand and/or increase available supply. Additional TSM/Parking Demand Management measures, described above, will be implemented, as necessary, to reduce parking demand to the extent necessary to meet available supply. In the event that SMCS parking demand exceeds available parking supply after reasonable efforts are undertaken to expand participation in the TSM/Parking Demand Management program, SMCS will increase available parking supply through the acquisition of off-site employee parking that will be connected to SMCS facilities through a shuttle system. (DEIR, p. 2-49.)

Locations where off-site parking could be provided cannot be specifically identified at this time because the project would be built out over a five to six year period during which the TSM/Parking Demand Management program would be incrementally expanded as necessary. Nonetheless, in an effort to verify the availability of potential off-site parking locations for employee parking, SMCS has researched numerous sites in the Highway 99 corridor south of the project area. Within a distance of less than five miles, SMCS has identified fifteen potential sites that would allow for remote parking, ease of access to Highway 99, and a direct route to the project area by either a shuttle or, in some cases, light rail. The sites range in size from approximately 150 to 250 spaces. If acquiring off-site parking becomes a necessity, SMCS would consult with the City to narrow the number of potential sites. While it is anticipated that existing parking lots would be acquired and used by SMCS for off-site parking (thus, continuing an ongoing use of the site), if additional environmental review is required for improvements to off-site lots or operation of parking shuttles, it will be conducted when specific off-site parking sites are proposed. (DEIR, p. 2-49.)

SMCS Employment Population

Development of the WCC and the SMF Building would increase the employee count within the SMCS complex by approximately 1,394 employees to about 2,633 employees, from a total of approximately 1,237 employees at SGH, the Buhler Building and other Sutter offices. Because hospital operations occur over a 24-hour period, seven days a week, all SMCS employees are not on the campus at one time. Table 2-7 provides a detailed breakdown of employees on-site by shift and building. (DEIR, pp. 2-49 - 2-50.)

Modifications to Existing Buildings

In addition to the spanning structure and the pedestrian bridges discussed above, below-grade tunnel connections would be enhanced and additional tunnels would be constructed to allow materials and service staff to circulate throughout all SMCS buildings effectively and efficiently. This includes construction of a tunnel between the Buhler Building and SGH under L Street and another under 28th Street to connect the Buhler Building and the SMF Building. These tunnels would be used by plant operations staff and for medical service/support. There would be no public access to the tunnels. (DEIR, p. 2-50.)

Removal of the parking garage, immediately adjacent to the east side of the Old Tavern Building to accommodate construction of the new WCC, would require the existing wall of the Old Tavern Building to be stabilized and repaired to match the existing wall. (DEIR, p. 2-51.)

SMCS Project Components Addressed at a Programmatic Level

Children's Theatre of California/ B Street Theatre

The EIR included a programmatic analysis of impacts associated with future development of the Children's Theatre/B Street Theatre on the block bounded by Capitol Avenue and N Street and 27th and 28th Streets (see Figure 2-1). The proposed Theatre would be developed by an entity other than SMCS, and would be subject to additional environmental review during the processing of development entitlements. (DEIR, p. 2-51.)

At this time, the Children's Theatre envisions an approximately 51,000-square-foot building with two separate theatres that would include a total of 565 seats. (DEIR, p. 2-51.)

The two separate theatres, Children's Theatre and the B Street Theatre, anticipate putting on a total of 11 plays per year, with each play running a total of six weeks. Show times for the B Street Theatre would be evenings Tuesday through Saturdays and afternoon matinees on Wednesdays and Sundays. Show times for the Children's Theatre would be morning matinees Tuesdays through Fridays and afternoon performances Saturdays and Sundays. The Children's Theatre would have performances concurrent with the school year, September through June. (DEIR, p. 2-51.)

SMCS Construction Timing/Phasing

It is anticipated construction of the SMCS Project would begin in 2006 and be completed by late 2010, subject to obtaining all required approvals. This schedule is preliminary and subject to change as each component of the project moves forward. The following provides a breakdown of the anticipated construction schedule for each component of the SMCS Project. A more detailed breakdown is provided in Table 2-8 which shows a graph of the proposed construction schedule.

Construction of the WCC would start in early spring 2007 and be completed by late 2010, subject to City and OSHPD approvals.

The SMF Building and Energy Center would begin construction in fall 2006 and be completed by early spring 2008.

The Community Parking Structure and associated commercial/retail space would start construction in spring 2006 and be completed by late 2006.

Construction on the 32 residential units is anticipated to begin in early 2007 and be completed by the end of 2007

Construction of the Future MOB is scheduled to begin in early summer 2006 and be completed by late summer 2007.

Installation of required utilities would be coordinated with the construction of each project and would occur between 2006 and 2009.

(DEIR, p. 2-53.)

SMCS Construction Parking Plan

Table 2-9 provides a breakdown of available parking during project construction. According to the construction schedule (see attached Table 2-8), construction of the Community Parking Structure will be completed before the WCC and the SMF Building are completed. A total of 2,096 parking spaces are currently available to serve visitors, patients, and staff of the SMCS, as well as residents and patrons to the various restaurants and businesses in the area. As shown in Table 2-9, once construction is complete a total of 2,792 spaces would be available to serve visitors, patients, staff, residents and patrons to the area. (DEIR, p. 2-53.)

During construction activities, materials and equipment are anticipated to be stored and staged in the northeast corner of the Community Block. The EAP Building, owned by SMCS, would be used by the construction company during construction activities. It is anticipated this building would be demolished at the end of the project. (DEIR, p. 2-53.)

IV. BACKGROUND

Project Applicant and Project Area

SMCS is an affiliate of the Sutter Health System, a not-for-profit community-based health care system that serves Northern California. The proposed new medical center renovations and expansions would consolidate all acute care facilities currently run by SMCS, adding new and expanded health and healing technologies, services and buildings. (DEIR, p. 2-1.)

The SMCS Project area encompasses a geographic area that is roughly bounded by 26th Street to
the west, N Street to the south, K Street to the north, and 30th Street to the east, shown in Figure 4-1. (DEIR, p. 4-1.) The entire project area includes development on a total of six (6) acres, spanning a total of seven (7) blocks. (DEIR, p. 2-2.) The project area includes the following elements within the seven (7) blocks: SGH, WCC, proposed SMF Building site, proposed Community Parking Structure and Retail/Commercial site, proposed new Sutter Midtown Housing Project, and two blocks containing existing parking lots leased from Caltrans. (DEIR, p. 4-3.)

Existing land uses in the project vicinity include medical offices, Regional Transit (RT) service center, restaurants, churches, Sutter's Fort State Historic Park, small apartment buildings, a senior housing project, older Victorian residences, and office space. See Figure 2-1 in Chapter 2, Project Description, which identifies existing land uses in the vicinity of the project area. (DEIR, pp. 2-2 and 4-3.)

On adjacent blocks, existing uses generally to the north of the project site include medical office buildings across K Street from SGH and Sutter's Fort, north of L Street, between 26th and 28th Streets, as shown in Figure 2-3, Existing Adjacent Uses. On the block bounded by 26th and 27th Streets and L Street and Capitol Avenue, there are residential uses and office uses, and on the block between Capitol Avenue and N Street west of 26th are residential uses. South of the project area, south of N Street, there are residential uses and some offices, some of which are vacant, and restaurant uses at the corner of N Street and 28th Street. The Regional Transit maintenance facility is on the east side of 28th Street, between N Street and Capitol Avenue. (DEIR, p. 2-5.)

Environmental Review Process

The City prepared an EIR to satisfy the requirements of CEQA, as well as to provide decision-makers and the public with information to enable them to consider the environmental consequences of the proposed actions. (DEIR, p. 1-4.) The EIR provides a project-level analysis for the SMCS Project, including the residential housing component, and Trinity Cathedral, and a programmatic analysis of the Children's Theatre of California. (DEIR, p. 1-4.)

As a first step in complying with the procedural requirements of CEQA, the City examined whether any aspect of the project, either individually or cumulatively, may cause a significant effect on the environment. It was determined that there were potentially significant impacts and the Notice of Preparation ("NOP") indicated that an EIR would be prepared to analyze these impacts. (DEIR, p. 1-8.)

The scope of the EIR includes environmental issues determined to be potentially significant through preparation of the NOP, Revised NOP, responses to the NOP, scoping meetings, and

discussions among the public, consulting staff, and the City of Sacramento. The City filed a NOP with the California Office of Planning and Research (OPR) as an indication that an EIR would be prepared. During preparation of the EIR, agencies, organizations, and persons who the City believed might have an interest in this project were notified. (DEIR, p. 1-8.)

The EIR or a Notice of Completion (NOC) of the EIR was distributed to agencies that commented on the NOP, responsible and trustee agencies, individuals and organizations requesting notice, surrounding cities, counties, and other interested parties for a 45-day public review period in accordance with section 15087 of the State CEQA Guidelines. (DEIR, p. 1-8.)

Upon completion of the public review period, written responses to all comments raised with respect to environmental issues were prepared and incorporated into the Final EIR ("FEIR"). Written responses to comments received from any State or local agencies were made available to these agencies at least ten days prior to the first public hearing during which the certification of the EIR was considered. These comments and their responses were included in the FEIR for consideration and certification by the Design Review and Preservation Board, Planning Commission, and City Council.

According to Public Resources Code Section 21081, no public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant effects on the environment without making specific Findings of Fact (Findings). The purpose of the Findings is to establish the connection between the analysis in the EIR and the action of the Lead Agency with regard to approval or rejection of the project. Prior to approval of a project, one of three findings must be made, as follows: (DEIR, p. 1-9.)

Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effects as identified in the EIR.

Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the FEIR.

Additionally, according to PRC section 21081.6, for projects in which significant impacts will be avoided by mitigation measures, the Lead Agency must include a Mitigation Monitoring Program (MMP). The purpose of the MMP is to ensure compliance with required mitigation during implementation of the project. (DEIR, p. 1-9.)

If a project will result in significant and unavoidable impacts, an agency must state in writing the specific reasons for approving the project based on the FEIR and any other information in the public record. This is termed a "Statement of Overriding Considerations" and is used to explain the specific reasons why the benefits of a proposed project make its unavoidable environmental effects acceptable. The statement is prepared before action is taken to approve the project and certify the EIR and is included as part of these findings.

No specific areas of concern relating to land use or planning issues were raised in comment letters received in response to either the first NOP or the Revised NOP. The Initial Study

determined that no agricultural resources would be significantly impacted by the SMCS Project or the Trinity Cathedral Project. Therefore, these issues were not discussed further in the EIR. (DEIR, p. 4-1.) Changes were made to the Final EIR in response to comments received on the Draft EIR, however.

A Notice of Completion ("NOC") was published on July 15, 2005, providing notice that the Draft EIR had been completed and was available for public review and comment. The Draft EIR was published and circulated for public comments from July 15, 2005 to September 9, 2005. On or about October 11, 2005, the City distributed and noticed for public review the Final EIR, including responses to the comments received on the Draft EIR and the Mitigation and Monitoring Plan, for a 10-day public review period by agencies who commented on the DEIR. (Pub. Resources Code, § 21092.5, subd. (a).)

The official custodian of the record is the City of Sacramento Development Services Department, Environmental Planning Services, 2101 Arena Boulevard, Suite 200, Sacramento, CA 95834.

V. FINDINGS FOR APPROVAL REQUIRED UNDER CEQA

Public Resources Code section 21002 provides that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would *substantially lessen* the significant environmental effects of such projects[.]" (Emphasis added.) The same statute states that the procedures required by CEQA "are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will *avoid* or *substantially lessen* such significant effects." (Emphasis added.) In the event that specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof. (Pub. Resources Code, § 21002.)

The mandate and principles announced in Public Resources Code section 21002 are implemented, in part, through the requirement that agencies must adopt findings before approving projects for which EIRs are required. (See Pub. Resources Code, § 21081, subd. (a); CEQA Guidelines, § 15091, subd. (a).) For each significant environmental effect identified in an EIR for a proposed project, the approving agency must issue a written finding reaching one or more of three permissible conclusions. The first such finding is that "[c]hanges or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR." (CEQA Guidelines, § 15091, subd. (a)(1).) The second permissible finding is that "[s]uch changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency." (CEQA Guidelines, § 15091, subd. (a)(2).) The third potential conclusion is that "[s]pecific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR." (CEQA Guidelines, § 15091, subd. (a)(3).)

Public Resources Code section 21061.1 defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account

economic, environmental, social and technological factors." CEQA Guidelines section 15364 adds another factor: "legal" considerations. (See also *Citizens of Goleta Valley v. Board of Supervisors* ("*Goleta II*") (1990) 52 Cal.3d 553, 565; *City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410, 417 ("feasibility" also encompasses desirability to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors and whether a particular alternative or mitigation measure promotes the underlying goals and objectives of a project).)

CEQA requires that the lead agency adopt mitigation measures or alternatives, where feasible, to substantially lessen or avoid significant environmental impacts that would otherwise occur. Project modification or alternatives are not required, however, where such changes are infeasible or where the responsibility for modifying the project lies with some other agency. (CEQA Guidelines, § 15091, subd. (a), (b).)

With respect to a project for which significant impacts are not avoided or substantially lessened, a public agency, after adopting proper findings, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the project's "benefits" rendered "acceptable" its "unavoidable adverse environmental effects." (CEQA Guidelines, §§ 15093, 15043, subd. (b); see also Pub. Resources Code, § 21081, subd. (b).)

These findings constitute the City's best efforts to set forth the evidentiary and policy bases for its decision to approve the Project in a manner consistent with the requirements of CEQA. To the extent that these findings conclude that various proposed mitigation measures outlined in the Final EIR are feasible and have not been modified, superseded or withdrawn, the City hereby binds itself to implement these measures. These findings, in other words, are not merely informational, but rather constitute a binding set of obligations that will come into effect when either the Design Review Board, Planning Commission or City Council adopts resolution(s) or ordinance(s) approving the Project.

POTENTIAL SIGNIFICANT ENVIRONMENTALIMPACTS AND MITIGATION MEASURES

The EIR identifies a number of potentially significant environmental effects (or "impacts") that the Project will cause. Some of these significant effects can be fully avoided through the adoption of feasible mitigation measures. Other effects cannot be avoided by the adoption of feasible mitigation measures or alternatives, and thus will be significant and unavoidable. Some of these unavoidable significant effects can be substantially lessened by the adoption of feasible mitigation measures. Other significant, unavoidable effects cannot be substantially lessened or avoided. For reasons set forth in Section XIII *infra*, however, the City has determined that the significant, unavoidable effects of the Project are outweighed by overriding economic, social, and other considerations.

A. AESTHETICS

<u>Impact 6.1-1:</u> Implementation of the SMCS Project could be visually incompatible with the mass, scale, or character of existing development in the vicinity of the project area. (Less than Significant). (DEIR, p. 6.1-18.)

Finding: Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.) Nevertheless, voluntary measures have been incorporated into the project to ensure

that the potential effects of the project remain less than significant.

Explanation:

SMCS Project

All of the components of the SMCS Project are subject to the Central City Neighborhood Design Guidelines, as well as the Design Guidelines and will be reviewed by the City's Design Review and Preservation Board. (DEIR, p. 6.1-18.) For example, the SMCS Project would include multiple exterior sign types used for wayfinding, identification and regulatory requirements within the project area.

Monument-style signs would be located at ground level and would identify the medical complex boundaries and provide directional information to major buildings or services. Each monument-style sign would include the SMCS name on top and would display directional information to the various buildings and departments, for example: Emergency Room, WCC, Sutter Medical Foundation Building, and Buhler Building. These signs would be four-sided with information on all sides including multi-lingual text. They would be placed at each major decision-making corner throughout the complex and would be internally illuminated for night viewing. Monument-style sign massing would be approximately 10 feet in height and five feet wide per side. (DEIR, p. 6.1-18 – 6.1-19.)

Vehicular-directional signage would be monument-style signs that would be placed at individual driveways into the WCC and SMF Building. These two-sided signs would be illuminated and would stand 10 feet in height and five feet wide. (DEIR, p. 6.1-19.)

Attractive parking-identification style signs would mark entries into parking areas and would also be placed to clearly identify Valet Parking services at specific buildings. The parking signs would be low in profile and could be single or double post and panel signs that would be five to six feet in height. (DEIR, p. 6.1-19.)

Women's and Children's Center

The WCC is an 8-story above-grade structure, approximately 167 feet high to the top of the mechanical penthouse. Construction of the WCC would replace views of the existing Energy Center, the Old Tavern parking structure, the (former) RAS medical office, and the existing surface parking lot (see Figure 6.1-10). (DEIR, p. 6.1-19.)

The WCC would be designed as an articulated structure with a multi-planed facade. The variation in planes is intended to minimize the overall scale of the building's mass. The design of the WCC and the horizontal proportions of Sutter General Hospital will create a unified medical complex. The exterior of the WCC would be composed of bands of off-white metal panels, combined with transparent and patterned or etched glass, creating an overall sense of scale and detail. The building's base would be sheathed in copper and would contain planters to integrate the building mass into the landscape. Air handling units, exhaust fans, and miscellaneous mechanical equipment would all be located on the roof of the new building. The main entrance to the WCC would be to the west of the building through a private drive and

entryway running north/south between the WCC and the Buhler Building (see Figure 2-6 in Chapter 2, Project Description). (DEIR, p. 6.1-19.)

The WCC would be connected to the existing SGH by a three-level spanning structure on levels 2, 3, and 4. The spanning structure would cross L Street from the north side of the WCC to the south side of SGH. Currently a pedestrian bridge spans across L Street on the western edge of the block from SGH to the Buhler Building. This one-story-tall bridge would be removed, and the new three-story spanning structure would be located closer to 29th Street (see Figure 6.1-11). In addition to the spanning structure across L Street, one enclosed pedestrian bridge would span 29th Street, south of the intersection of L and 29th Streets, connecting the WCC with the existing parking structure under the freeway. Another pedestrian bridge would span the private drive between the WCC and the Buhler Building connecting the two buildings. (DEIR, p. 6.1-19.)

Similar to the existing SGH and Buhler Building, the proposed WCC would be visible to traffic on the elevated Capital City Freeway to the east. The new building would replace existing views of the Buhler Building from the freeway and from 29th Street looking west. Looking east from Sutter's Fort and L Street, the top of the WCC would be visible above the Buhler Building. Views from Sutter's Fort would be consistent with existing views to the east that currently include SGH, the Buhler Building and the existing bridge between the two buildings. (DEIR, p. 6.1-19.)

The most notable visual change due to construction of the new WCC would be from 28th Street and Capitol Avenue, viewing the new building against the existing Old Tavern Building. Existing views consist of the Old Tavern parking structure and former medical office buildings, which are similar in scale to the Old Tavern Building (see Figure 6.1-5). The parking structure currently abuts and is lower than the Old Tavern Building and is lower than the four-story building. The new WCC would be separated from the Old Tavern Building with the private drive (Motor Court) and entryway between the two buildings, but it would be substantially taller, with a larger mass and scale (see Figure 6.1-12). (DEIR, p. 6.1-22.)

SMF Building

The SMF Building would replace existing views of surface parking lots, the House of Furs building, a single-story private medical office building, and the two-story MTI office buildings with a four-story above-grade, approximately 82-foot-high building (see Figure 6.1-6). The SMF Building exterior would include a combination of copper and horizontal siding with large windows on the second floor. The building would include ground-floor retail on L Street. The building would be stepped back from L Street and Sutter's Fort to reduce visual impacts on the historic Sutter's Fort complex and the adjacent Pioneer Church (see Figure 6.1-13). The SMF Building would also include the relocated Energy Center for the SMCS Project. Most of the Energy Center facilities would be located below-grade on the southern portion of the building and would not be visible. Above-grade components would include extensions of the air intakes for combustion air and exhaust stacks along the west side of the roof of the Energy Center. An oxygen tank would be located just west of the above-grade air intake approximately mid-block. The cooling towers would be approximately 27 feet tall. The cooling towers would be located on the roof of the SMF Building in a location that would not be visible from street level. (DEIR, p. 6.1-22.)

The current view to the south from the Sutter's Fort entrance on L Street consists of Pioneer Church and the painted fence surrounding a surface parking lot on L and 28th Streets. Because the painted fence is less than one story tall, the current view to the south also includes the trees and office buildings on the southern half of the City block. (DEIR, p. 6.1-22.)

The new SMF Building would replace existing views from L Street that extend to the southern portion of the City block through to Capitol Avenue. Visitors to Sutter's Fort would no longer be able to see the upper portion of the Old Tavern Building. The new SMF Building would be stepped back from L Street and immediate views from ground level would appear as a two-story building. Views from farther to the north, including from Sutter's Fort, would be of a four-story building with ground-level landscaping. The scale and mass of the proposed SMF Building would be consistent with the existing Buhler Building to the east, and the height would be approximately the same as the existing Pioneer Church to the west. (DEIR, p. 6.1-22.)

The view of the west side of the proposed SMF Building would include screening walls around the Energy Center equipment (liquid oxygen tank and transformer yard) and the entrance to the underground parking area. A 22-foot tall metal, louvered wall would be constructed along the west side of the SMF motor court along the north and east sides of the oxygen tanks, while a 10-foot tall concrete wall would be constructed around the transformer yard, adjacent to the existing playground area. The screening wall adjacent to the existing playground may be visible from Capitol Avenue. (DEIR, p. 6.1-22.)

Existing views of one- and two-story buildings from 28th Street and Capitol Avenue would be replaced with the east elevation of the SMF Building. Views north and south along 28th Street would also include the new pedestrian bridge from the SMF Building to the Buhler Building. The pedestrian bridge would be a glass enclosed structure that would connect the two buildings at the second floor. This view would also be consistent with the existing visual character of 28th Street, which includes the Buhler Building and SGH. (DEIR, p. 6.1-25.)

Ingress and egress into the SMF Building would be through a private drive located on the west side of the building, between the new SMF Building and Pioneer Church and senior housing. This driveway would also serve to set back the new building from Pioneer Church by approximately 30 feet. (DEIR, p. 6.1-25.)

Future Medical Office Building

The view of the existing St. Luke's Medical Office Building (MOB) would be replaced with the new Future MOB at the corner of Capitol Avenue and 26th Street that would be smaller in scale than the existing four-story building (see Figure 6.1-14). The existing 70,000-square foot building would be replaced with approximately 35,000 square feet of medical office space Additional squarer footage for parking for the Future MOB would be below-grade and would not be visible. Ingress and egress to the parking garage would be either on the south side of the building, exiting onto the alley or along the west side exiting onto 26th Street. Future views of the MOB project site would be similar to views and would be in scale with the two-story residences to the west along 26th Street that would remain. Views onto the project site from Trinity Cathedral would also be similar to existing views of the St. Luke's building. (DEIR, p. 6.1-25.)

Community Parking Structure

The Community Parking Structure would replace views of surface parking lots with a seven-story above-grade building up to 83-feet high (see Figure 6.1-15). The Community Parking Structure would replace current views looking north from N Street of the senior housing and the EAP building, Trinity Apartment, vacant lot, Capitol Physical Therapy, Café Bernardo's, and the Monkey Bar. The Community Parking Structure would be located on the south side of the alleyway between Capitol Avenue and N Street and would replace existing views from the alleyway that currently extend across the parking lot to the residences and offices on N Street. The parking structure would include one-story ground floor retail or commercial development on the south side, facing N Street. Ingress and egress into the parking structure would be from 27th and 28th Streets. The parking structure would be across the street from the RT maintenance facility on 28th Street and residential, office, and restaurant uses to the south on N Street. While the new parking structure would be generally consistent with other types of uses in the project area, it would replace existing surface-level uses with a seven-story structure. In addition to replacing the existing views from both the residences on the south side of N Street and the existing business on 28th Street north of the alleyway, the parking structure could result in additional shadows across the street and alleyway that may extend onto the residences, offices, and Capitol Physical Therapy during specific times of the day and year. (DEIR, p. 6.1-25.)

Housing

The proposed Sutter Midtown Housing Project on N Street between 26th and 27th Streets would replace views of the existing three-story St. Luke's parking structure with two- to three-story residential town homes, approximately 36-feet high (see Figure 6.1-16). The existing two-story residential buildings on the east and west sides of the parking garage would remain. The proposed residential project would consist of separate multi-family units with parking that would be accessed from the alleyway to the north or N Street. The new housing units may be taller than the two-story buildings that would abut them on the east and west, but the overall scale and mass would be consistent with existing residential uses in the project area (DEIR, p 6.1-28.)

Theatre

The proposed Children's Theatre of California would be an approximately 50,000-square-foot building located on the corner of Capitol Avenue and 27th Street. The Theatre would replace existing views of the Trinity Apartment building, surface lots, and the EAP office building with one main 365-seat theatre and one additional theatre that would contain 200 seats. Similar to the SMCS components, design of the proposed Theatre would be required to comply with the Central City and Alhambra Corridor Design Guidelines. (DEIR, p. 6.1-28.)

The proposed SMCS Project is subject to the City's Design Guidelines and the design of the project includes many elements that are consistent with these guidelines. For example, the proposed WCC includes a multi-planed facade to minimize the overall scale of the building's mass, and the proposed SMF Building includes a stepped-back design from L Street to reduce visual impacts. Additionally, the proposed Community Parking Structure includes single-story retail uses that would front N Street. (DEIR, p. 6 1-28)

Mitigation Measures: **The Project will not result in significant aesthetic impacts because of the design of the Project and compliance with the design review guidelines. In addition, all components of the SMCS Project would be subject to a landscaping plan that would maintain and enhance existing streetscape by retaining existing trees, where feasible, and adding new trees, decorative paving, and new ornamental landscaping.**

However, to assure that the potential impacts remain below a level of significance, the project proponent shall implement mitigation measure 6.1-1 which provides: *The north facade of the proposed Community Parking Structure, adjacent to the alleyway between 27th and 28th Streets, shall be designed to minimize visual impacts on the existing businesses along the alleyway, either through a building stepback or wall treatments, including vegetation and/or artwork.* (DEIR, pp. 6.1-30.)

Significance After Mitigation: **Less than significant. (DEIR, p. 6.1-28.)**

Impact 6.1-2:
Implementation of the SMCS Project could create light or glare that could affect adjacent properties. (Less than Significant after Mitigation). (DEIR, p. 6.1-30.)

Finding: This impact can be reduced to a less than significant level through implementation of Mitigation Measure 6.1-2(a). Changes or alterations therefore have been required in, or incorporated into, the project which mitigate or avoid the significant environmental effect as identified in the DEIR, and result in a less-than-significant impact.

Explanation: **The proposed SMCS and Children's Theatre projects would introduce new sources of lighting to the project area. Existing conditions include office buildings, residences, surface parking, and some street lights, all of which include existing sources of light. The SMCS Project would also introduce three new skyline-type illuminated signs that would be visible from locations west and east of SGH and the proposed WCC. Because the SMCS Project and the Children's Theatre would introduce several new sources of light and potential glare, this would be a *potentially significant impact.* (DEIR, pp. 6.1-32.)**

Most of the components of the proposed SMCS Project would not create significant sources of glare on surrounding areas, however. The SMF Building would be stepped back on its northern side, and the remaining facades would be a combination of copper and horizontal siding and windows. The WCC facades would be a combination of transparent and patterned or etched glass windows and bands of off-white metal panels. The building's base would be sheathed in copper and would be visible from north and southbound traffic on the elevated Capital City Freeway. (DEIR, p. 6.1-30.)

Hospital Lights and Signage

As mentioned above, the proposed SMCS Project would include skyline signs, which consist of illuminated signs mounted at the parapet level of a building. Three skyline signs are proposed, one on the east side and one on the west side of the WCC and one on the east side of SGH.

Skyline signs would be used as distance identification and way finding for the medical complex. (DEIR, p. 6.1-31.)

Two of the proposed skyline signs would be visible from the Capital City Freeway. The eastern skyline sign is intended to be seen along the route at a distance to help drivers identify the general site location and upcoming exits from both north and southbound approaches. The signs would be sized for distance recognition, with the east facade WCC sign at 5-feet high individual letters with an overall width of 100 feet. The letters and logo form would be illuminated 24 hours a day. (DEIR, p. 6.1-31.)

As described in the EIR, the SMCS Project would also include monument-style signs that would be located at ground level and would display directional information. These four-sided signs would be placed at each major decision-making corner throughout the complex and would be internally illuminated for night viewing. Monument-style sign massing would be approximately 10 feet in height and five feet wide per side and would include multi-lingual text. In addition, vehicular-directional style signage would include two two-sided vehicular directional signs placed at individual driveways into the WCC and SMF Building. These signs would be illuminated and would stand 10 feet in height and five feet wide. (DEIR, p. 6.1-31.)

Building identification is proposed at first floor levels at main building entries to identify and reinforce destinations within the complex, such as "Buhler Building" or "EMERGENCY." These signs would be building-facade mounted individual letters that may be 12 inches to 24 inches in height, depending on the building name. These signs could be internally illuminated or lit with ambient lighting, with the exception of the Sutter General Emergency Room public entry, which must display red illuminated "EMERGENCY" signage at the entry doors. (DEIR, p. 6.1-31.)

Ground-level illuminated signs, either on the surface of buildings or mounted in the parking and driving areas, would not generate substantial spillover light onto existing uses. The signage that would be most visible to surrounding uses would be the skyline illuminated signs located near the tops of the proposed WCC and SGH. The skyline signs on the east sides of the WCC and Sutter General Hospital would be visible from cars driving on the Capital City Freeway and from the parking area located under the freeway between 29th and 30th Streets. These signs could also be visible from existing uses east of the freeway. The skyline sign on the west side of the WCC would be visible from the west. (DEIR, p. 6.1-31.)

The proposed WCC would include lighting on the top of the building associated with the proposed helistop. The helistop would be used for periodic infrequent transfers of seriously ill infants, children, and adults to the hospital. The helistop lighting would not be visible to the ground. However, floodlighting to illuminate the area for medical personnel may be visible. In addition, the helistop identification beacon would be visible from the ground, as would the red obstruction lights installed on various corners of the building. (DEIR, p. 6.1-31.)

Mitigation Measures: Implementation of Mitigation Measure 6.1-2(a) would ensure that project lighting would be directed internally to minimize spillover onto adjacent uses. Mitigation Measure 6.1-2(b) would ensure that building facade materials do not generate substantial glare. Mitigation Measure 6.1-2 (c) would ensure that the illuminated skyline on the WCC is not visible to sensitive receptors located within or adjacent to Sutter's Fort.

Significance After Mitigation: Less than significant after mitigation. (DEIR, p. 6.1-32.)

Impact 6.1-3: Implementation of the SMCS Project could create substantial shadows on adjacent properties. (Less than Significant). (DEIR, p. 6.1-33.)

Finding: Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation:

Women's and Children's Center: The WCC would replace a surface valet parking lot, the Energy Center, the Old Tavern parking structure, and the (former) RAS medical office with an 8-story above-grade structure, approximately 167 feet high to the top of the mechanical penthouse. Construction of the WCC would create new shadows from a multi-story building and the shadows cast by this proposed element would extend farther than under current conditions. However, there are existing sources of shadow, including the parking structure next to the Old Tavern Building and the existing Energy Center. At times of the year when the sun is low in the sky, even shorter buildings cast shadows on sidewalks. For instance, in winter, the three-story parking structure will cast a shadow on the sidewalk on the south side of Capitol Avenue. Therefore, while the proposed WCC would create new shadow, most of the surrounding area already experiences frequent periods of shadow during the day from existing buildings in the midtown area. (DEIR, p. 6.1-33.) The impacts to existing surrounding commercial and retail uses, moreover, would be less than significant considering the types of uses involved.

SMF Building: As stated above, ingress and egress into the SMF Building would be through a driveway located on the west side of the building, between the new SMF Building and Pioneer Church and the existing playground. This driveway would also serve to set back the new building from Pioneer Church. Because the SMF Building would be set back by approximately 30 feet from the Pioneer Church and the playground and because the height of the building is not expected to exceed the height of the Church, it is not anticipated that the building would block sunlight into the church windows or create substantial shadow impacts on the playground. (DEIR, p. 6.1-33.)

Community Parking Structure: In addition to replacing the existing views from both the residences on the south side of N Street and the existing business on 28th Street north of the alleyway, the Community Parking Structure could result in additional shadows across the street and alleyway that may extend onto the residences and Capitol Physical Therapy Center during specific times of the day and year. (DEIR, p. 6.1-33.)

Theatre: It is not expected that the Theatre would result in shadows that would significantly block sunlight on adjacent uses. (DEIR, p. 6.1-33.)

In addition to the specific elements discussed above, the rest of the SMCS Project components would generate new shadows in the project area. The proposed Future MOB would replace an existing building with a new building on a smaller scale and would cast similar shadows as under existing conditions. Similarly, the proposed Sutter Midtown Housing Project would replace the existing St. Luke's parking structure with two- to three-story residential town homes, which would most likely produce shorter shadows. In addition, existing uses on and around the project components currently create shadows on City streets and office, residential, restaurant, and public uses. Therefore, this would be considered a ***less-than-significant impact***. (DEIR, pp. 6.1-34.)

Mitigation Measures: *None required*. (DEIR, p. 6.1-34.)

Significance After Mitigation: The impact is less than significant without mitigation (DEIR, p 6.1-34.)

<u>Impact 6.1-4:</u> Implementation of the SMCS Project could conflict with applicable City policies or design guidelines. (Less than Significant). (DEIR, p. 6.1-34.)

Finding: Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation: The proposed SMCS Project is subject to the Central City Neighborhood and Design Guidelines. The Design Guidelines are intended to ensure the proper relationship and connection with surrounding development between neighborhoods in the Corridor, East Sacramento, and Midtown. (DEIR, p. 6.1-34.)

The Design Guidelines include generalized goals and policies for residential, mixed-use, commercial, and industrial neighborhoods. The Design Guidelines also include a landscape element and address the Neighborhood Preservation Transition Buffer Areas. The Buffer Area applies to any development in any zone that is located within 300 feet of a residential zone (measured from the street centerline) and includes a 35-foot height limit. Development of the Future MOB, Community Parking Structure, Sutter Midtown Housing Project and Theatre components would require a variance for buildings that are proposed over 35 feet high. (DEIR, pp. 6.1-34 – 6.1-35.)

The Central City project-design guidelines address the following design subjects that are relevant to the SMCS Project: site planning; site design; building character and quality; lighting; signage; equipment, utilities and service access; energy efficiency; modifications to existing structures; special use structures; alley development; accessory structures; and flood-resistant design. The City Design Review and Preservation Board has reviewed the SMCS Project components' design plans for consistency with the Central City Neighborhood Design Guidelines. Because the SMCS Project elements are anticipated to be in context with existing surrounding uses, and the project design is subject to approval by the City Design Review and Preservation Board, this is a ***less-than-significant impact*** (DEIR, p. 6.1-35.)

Theatre: It is assumed the Theatre would be designed to be consistent with City policies and

adopted design guidelines and would be subject to review and approval based on its consistency,

therefore, the impact is considered *less than significant.* **(DEIR, p. 6.1-35.)**

Mitigation Measures: *None required.* (DEIR, p. 6.1-35.)

Significance After Mitigation: The impact is less than significant without mitigation. (DEIR, p. 6.1-35.)

Impact 6.1-5: Implementation of the SMCS Project, in combination with cumulative development, could alter the visual character of the Central City. (Less than Significant) (DEIR, p. 6.1-36.)

Finding: Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation:

SMCS Project and Theatre:

Development of the various project components would result in the demolition of some existing buildings and the construction of new buildings. The Central City area, including the Corridor area, is predominantly built out with existing residential, commercial, office and municipal uses. Future projects in the area could include on-going redevelopment by the City of Sacramento, as well as private projects that may change the visual character of the area. Because the Central City area is predominately built out and future development would be required to comply with the Design Guidelines, the cumulative change to the visual character of the area would be a *less-than-significant impact.* **(DEIR, p. 6.1-36.)**

Mitigation Measures: ***None required.*** **(DEIR, p. 6.1-36.)**

Significance After Mitigation: The impact is less than significant without mitigation. (DEIR, p 6.1-36.)

Impact 6.1-6: Implementation of the SMCS Project, in combination with cumulative development within the viewshed of the project site, could create light or glare that could affect adjacent properties. (Less than Significant) (DEIR, p. 6.1-36.)

Finding: Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation:

As stated above, the Central City and Alhambra Corridor areas currently consist of built-out urban, commercial, and residential neighborhoods. The areas within the viewshed of the SMCS Project currently contain small to mid-sized office and residential buildings and associated lighting. The project area also contains existing City street lights, and lighting for commercial and public uses. Future redevelopment construction in the area would either construct new buildings on currently vacant lots and parking lots or replace existing buildings with new ones. It is not anticipated that future projects would contribute new sources of significant lighting or glare. In addition, future projects would be reviewed by the City's Design Review and Preservation Board for consistency with the City's design guidelines, including site lighting guidelines. The SMCS Project would introduce new sources of lighting to the project area, which currently contains existing sources of light from office buildings, residences, surface parking, and street lights. Implementation of Mitigation Measure 6.1-2 would ensure that the project-specific light impact would remain less-than significant. Therefore, the cumulative impact from light and glare would be ***less than significant***. (DEIR, pp. 6.1-36-6.1-37.)

Mitigation Measures: ***None required*. (DEIR, p. 6.1-37.)**

Significance After Mitigation: The impact is less than significant without mitigation. (DEIR, p. 6.1-36.)

B. AIR QUALITY

<u>Impact 6.2-1:</u> Increase in fugitive dust from demolition of existing buildings. (Less than Significant after Mitigation). (DEIR, p. 6.2-14.)

Finding: This impact can be reduced to a less than significant level through implementation of Mitigation Measure 6.2-1. Changes or alterations have therefore been required in, or incorporated into, the project which mitigate or avoid the significant environmental effect as identified in the DEIR.

Explanation: As part of the SMCS Project, a number of existing buildings would need to be demolished and these activities would generate fugitive dust. Significant amounts of fugitive dust (PM_{10}), even though they would be temporary in nature, could have health impacts on sensitive receptors. (DEIR, p. 6.2-15.)

There are ten buildings slated for demolition as part of the SMCS Project, totaling over 114,000 square feet (sf). If not relocated, a small third party medical office and the House of Furs building would also be demolished as part of the SMCS Project. It can be assumed that the largest fugitive dust impact from building demolition would occur when the largest building is demolished. The largest building scheduled for demolition is the four-story St. Luke's Medical Office Building (approximately 70,000 sf). The medical office would be demolished and rebuilt with a smaller structure as part of the SMCS Project. Construction of the WCC would require demolition of the Old Tavern parking structure, the (former) RAS medical office, and the Energy Center, as well as a surface parking lot. Construction of the SMF Building would require demolition of the MTI office buildings, the House of Furs building, a small third party medical office (if not relocated), and surface parking areas. Construction of the Community Parking Structure would not require any building demolition, but would require removal of a large surface parking lot. Construction of the residential component would require removal of the St. Luke's parking structure. (DEIR, p. 6.2-15.)

Using the URBEMIS 2002 modeling program, it was determined that fugitive dust associated with demolition of the St. Luke's Medical Office Building was calculated to be the largest area that would be demolished. A total of approximately 403.84 pounds per day of PM_{10} was calculated to occur during building demolition. The SMAQMD's standard of significance for PM_{10} is a concentration-based threshold of 50 $\mu g/m^3$. The SMAQMD does not provide any guidance for calculating PM_{10} concentrations from demolition activities with a dispersion model. However, it can be assumed that the 403.84 pounds per day of dust from building demolition would exceed the SMAQMD's PM_{10} concentration threshold at the property line during the most intensive demolition period. Consequently, this would be considered a ***short-term significant impact***. (DEIR, p. 6.2-15.)

Theatre: The Children's Theatre of California project would be developed on land that is partially occupied by two existing buildings (EAP Building and Trinity Apartments). The Trinity Apartments are proposed to be demolished at the start of the SMCS Project. The EAP building would be demolished at the end of the SMCS Project. At this time, the Theatre has not yet submitted a formal application to the City for consideration of the Children's Theatre project. At the time an application is submitted to the City it is anticipated additional environmental review would be required. However, at this time, as with the SMCS Project, demolition of these structures would generate fugitive dust that could cause the SMAQMD'S PM_{10} concentration standard to be exceeded. This would be considered a *short-term significant impact*. **(DEIR, p. 6.2-15.)**

Mitigation Measures: Implementation of Mitigation Measures 6.2-1 and 6.2-2 would substantially reduce the amount of PM_{10} generated by building demolition. Mitigation Measure 6.2-1 provides:

6.2-1 (a) *The project applicant shall require in all construction contracts that the demolition contractors will ensure that all exterior surfaces of buildings are wetted during building demolition activities. The material from any building demolition shall be completely wetted during any period when the material is being disturbed, such as during the removal from the construction site.*

(b) *All piles of demolished material shall be wetted and covered until removed from the site.*

(c) *Maintain two feet of freeboard space on haul trucks.*

(d) *All operations shall expeditiously remove the accumulation of mud or dirt from adjacent public streets at the end of each workday. (The use of dry brushes is expressly prohibited except where preceded by sufficient water or chemical stabilizer/suppressant).*

(e) *Wheel washers for exiting trucks shall be installed, or all trucks and equipment leaving the site shall be washed off.*

(f) *All trucks removing demolition debris or excavated soil from the site(s) shall be wetted and covered.*

(g) *SMCS or contractor shall ensure that buildings are demolished in succession, and that no buildings are demolished simultaneously.*

(DEIR, p. 6.2-16.)

In general, keeping buildings wetted-down (Mitigation Measure 6.2-1(a)) is a technique employed on a regular basis by demolition contractors. Although the SMAQMD does not have regulations for demolition that specify mitigation for this activity, other districts have regulations of this nature. (see San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) Regulation VIII – Control Measures for Construction Emission of PM_{10}). This regulation specifies measures that can be used to limit PM_{10} during construction activities. (DEIR, p. 6.2-16.)

Significance After Mitigation: The impact is less than significant after mitigation. (DEIR, p. 6.2-16.)

Impact 6.2-2: Fugitive dust during grading of construction site(s). (Less than Significant After Mitigation). (DEIR, p. 6.2-17.)

Finding: This impact can be reduced to less than significant levels through implementation of Mitigation Measure 6.2-2. Changes or alterations have therefore been required in, or incorporated into, the project which mitigate or avoid the short-term significant environmental effect as identified in the DEIR.

Explanation: Prior to actual building construction, the building sites must be graded and prepared for development. Fugitive dust or PM_{10} is generated during this process as the ground is disturbed. The total amount of PM_{10} generated is normally determined by the size of the graded area. The larger the area, the more PM_{10} is created. In the case of the SMCS Project, the total area to be graded is approximately 6 acres. This estimate also includes grading for the future Children's Theatre of California. It is anticipated that grading would not occur on one large parcel of land, but on five separate parcels. Because of the staggered construction schedule, it is unlikely that these parcels would be graded simultaneously. Since the parcels are relatively small, it is assumed that each parcel would be completely graded during the course of a single day. The most fugitive dust would be generated during the grading of the largest parcel. The largest individual parcel is the approximately 1.7 acre Community Parking Structure site. (DEIR, p. 6.2-17.)

The SMAQMD recommends a PM_{10} threshold of significance that is equal to the CAAQS for PM_{10} of 50 $\mu g/m^3$. The SMAQMD's *Guide to Air Quality Assessment in Sacramento County* (Guide) specifies a methodology for evaluating whether a project would exceed this PM_{10} standard during construction. Appendix B of the Guide contains Table B.1 – Particulate Matter Screening Level for Construction Projects. This table lists various acreages and mitigation associated with the various acreage ranges which would reduce PM_{10} impacts to less-than-significant levels. As long as a project's maximum acreage graded per day falls into one of the acreage ranges, and the appropriate mitigation measures are applied, the project would be considered to have a less than significant PM_{10} impact during construction, and no concentration modeling is required. (DEIR, p. 6.2-17.)

Theatre: Grading associated with the Children's Theatre component is included in the total 6 project acres because it is assumed this site would be graded during construction

of the SMCS Project. Therefore, the impact would be considered a *short-term significant impact*. **(DEIR, p. 6.2-17.)**

Mitigation Measures: **As noted above, the SMAQMD requires specific mitigation for projects of different sizes to ensure that PM_{10} thresholds are not exceeded. According to Table B.1 of the SMAQMD Guide, the SMCS Project would have to implement Level One mitigation to ensure that PM_{10} levels do not exceed the SMAQMD threshold. Level One mitigation includes such things as watering exposed soil and ensuring that there is freeboard space on haul trucks that transport dirt and other material. For projects between 5.1 and 8 acres, the SMAQMD requires the following mitigation. According to the SMAQMD Guide, compliance with Mitigation Measure 6.2-2 would decrease fugitive dust (PM_{10}) impacts from grading associated with the SMCS Project and the Theatre to a level that is considered *less than significant*. (DEIR, p. 6.2-18.) Mitigation Measure 6.2-2 requires:**

6.2-2 The following measures are required by the SMAQMD for level one mitigation, and shall be implemented during grading at all project sites:

Water exposed soil twice daily.

Maintain two feet of freeboard space on haul trucks

In addition, the following measures shall be implemented to further reduce the PM_{10} impact during construction activity:

(c) All operations shall limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at the end of each workday. (The use of dry brushes is expressly prohibited except where preceded or accompanied by sufficient water or chemical stabilizer/suppressant.)

(d) Wheel washers for all exiting trucks shall be installed, or all trucks and equipment leaving the site shall be washed off.

(e) Excavation and grading activity shall be suspended when winds exceed 20 mph.

(f) All trucks removing demolition debris or excavated soil from the site(s) shall be wetted and covered.

Significance After Mitigation: The impact is less than significant after mitigation. (DEIR, p. 6.2-18.)

<u>Impact 6.2-3:</u> Increase in NO_x emissions generated by construction equipment. (Significant and Unavoidable for SMCS Project; Less than Significant for Theatre). (DEIR, p. 6.2-18.)

Finding: Changes or alterations have been required in, or incorporated into, the SMCS Project that substantially lessen, but do not avoid, the Project's short-term significant effects associated

with air quality. No mitigation is available to render the effects less than significant. The effects therefore remain short-term significant and unavoidable.

For the Theatre, however, no mitigation measures are required. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation:

Various pieces of construction equipment would be used during the grading and construction of the SMCS Project components. Much of this equipment is diesel-fueled and emits NO_x as part of the fuel-combustion process. The number and type of equipment used for construction on any one day would determine whether SMAQMD thresholds for NO_x would be exceeded. As discussed in Impact 6.2-1 and Impact 6.2-2, it is not anticipated that the project sites for the various SMCS Project components would be graded simultaneously. However, actual construction of the buildings would overlap. Consequently, for calculating daily emissions of NO_x, the site(s) with the most pieces of equipment being used at any one time would have the highest daily NO_x amounts. According to the construction schedule, there would be periods where a number of different project components would have overlapping construction activities in 2007. These would be the WCC (398,400 square feet), the SMF Building (203,382), the Future MOB (35,000 square feet), and the residential component (32 units approximately 1,250 sf in size). (DEIR, p. 6.2-19.)

Construction of the WCC is scheduled to begin in early spring 2007 and be completed by late 2010. Construction of the SMF Building is scheduled to begin in the fall of 2006 and be completed by the spring of 2008. The Future MOB would begin construction in early summer 2006 and be completed by late summer 2007. The residential units would be constructed throughout 2007. These project components would have construction periods that overlap by four to six months, from the spring of 2007 to the middle or end of summer 2007. This period would be when the most construction equipment would be operating simultaneously, and consequently, when the greatest daily amounts of criteria air pollutants would be generated by construction activities. (DEIR, p. 6.2-19.)

The URBEMIS 2002 modeling program was used to calculate NO_x emissions from the construction phases of these buildings during this overlapping "worst case scenario" period. The SMAQMD recommends that construction impacts be analyzed using Table 3.1 of the SMAQMD Guide. This table specifies types and numbers of construction equipment that would typically be used for projects of different sizes. Equipment as specified in Table 3.1 was used in the URBEMIS 2002 model. This modeling showed that construction associated with the WCC would generate approximately 35.97 pounds per day of NO_x in spring 2007, construction associated with the SMF Building would generate 107 pounds per day of NO_x during this same period, the Future MOB would also contribute 107 pounds per day, and construction of the residential units would contribute 73.89 pounds per day. These emissions would combine for a total maximum of approximately 323.86 pounds of NO_x per day during the portion of 2007 where construction overlaps. This would be in excess of the SMAQMD construction NO_x threshold of 85 pounds per day and would be a ***short-term significant impact***. (DEIR, p. 6.2-19.)

Theatre: As with the SMCS Project, Table 3.1 of the SMAQMD guide was used to determine the type and amount of equipment that would be used during the construction period. Using these assumptions, NO_x emissions were calculated for a building this size when built over a one year period. Maximum daily NO_x construction emissions were

estimated to be approximately 60.87 pounds per day. This would not exceed the SMAQMD standards of significance for construction NO_x and would result in a *less-than-significant impact.* **(DEIR, p. 6.2-19.)**

Mitigation Measures: The SMAQMD requires that certain mitigation measures be implemented for all construction projects. Mitigation Measure 6.2-3 (a-c) fulfills this SMAQMD requirement and would reduce the NO_x impact from construction activities associated with the various SMCS Project components. In addition, Mitigation Measure 6.2-3 (d-g) would further decrease the emissions of NO_x from construction activities by at least 20 percent resulting in maximum NO_x levels of approximately 259 pounds per day. Using alternative fueled equipment could reduce NO_x emissions by another 14%, resulting in maximum NO_x levels of 213 pounds per day. This would not reduce the amount of NO_x generated daily to below the level of significance, and this would remain a *short-term significant and unavoidable impact*. Heavy duty NO_x reduction is limited by available technology. Additional feasible mitigation that would achieve substantially more NO_x reductions is unavailable at this time. (DEIR, p. 6.2-20-21.)

Significance After Mitigation: For the SMCS Project, the impact remains significant and unavoidable despite the implementation of all feasible mitigation measures. (DEIR, p. 6.2-20.) For the Theatre, the impact is less than significant without mitigation. (DEIR, p. 6.2-19.)

<u>Impact 6.2-4:</u> Generation of ROG and NO_x (criteria pollutants) associated with project operation. (Significant and Unavoidable for the SMCS Project; less than significant for the Theatre). (DEIR, p. 6.2-21.)

Finding: For the SMCS Project, changes or alterations have been required in, or incorporated into, the Project that substantially lessen, but do not avoid, the Project's significant effects associated with air quality. No additional feasible mitigation measures are available to reduce or render the effects less than significant. The effects therefore remain significant and unavoidable.

For the Theatre, no mitigation measures are required for impacts because the impact is less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation: Operation of the SMCS Project would generate an increase in criteria pollutants associated with hospital operation. ROG and NO_x are the primary criteria pollutants of concern in Sacramento County because they react to form ozone, which is considered a criteria pollutant. The County is currently in nonattainment of the federal and State ozone standards. Emissions would be created by the SMCS Project in two ways; 1) Stationary equipment used to operate the facilities (industrial boilers, water heaters), would create ozone precursors of ROG and NO_x, and 2) the increase in traffic generated by the project would also contribute ROG and NO_x.

The project component that is expected to contain most of the large fuel-fired equipment would be the proposed Energy Center. Equipment at the new Energy Center would, for the most part, replace older equipment at the existing Energy Center. The horsepower or capacity of some of the equipment may be increased to account for the larger size of the expanded SMCS facilities. Equipment would include natural gas boilers for heat, electric chillers, and diesel-fueled backup generators. Five evaporative cooling towers would also be included. All new equipment would require a permit from the SMAQMD prior to operation. This would ensure that the equipment

achieves the lowest achievable emission rate for its equipment class. Consequently, the newer equipment may actually be held to more stringent emission standards than existing equipment. (DEIR, p. 6.2-21.)

The amount of ROG and NO_x that would be generated by operation of the project was calculated using the URBEMIS 2002 modeling program. (DEIR, p. 6.2-22.) As shown in Table 6.2-5 of the DEIR, the combined impact from operation of all the SMCS buildings would exceed the SMAQMD thresholds of 65 lbs/day for ROG and NO_x. This would result in a ***significant impact***. (DEIR, p. 6.2-22.)

Theatre: Because of its smaller size, the Theatre will generate fewer operational and construction emissions. In addition, because the Theatre would function as a rehearsal and performance space, its use is less intensive than any of the SMCS components, where numerous activities occur on a more or less continuous basis. Stationary source emissions from the Theatre would be limited to those generated by heating and cooling units. The majority of emissions from the project would be generated by the traffic that would travel to and from the theatre for performances. The intermittent nature of the traffic generated by the theatre is reflected in the traffic study prepared for the project, and is consequently reflected in the URBEMIS modeling. The modeling showed that, on average, the theatre would generate 15.62 pounds per day of ROG and 2.04 pounds per day of NO_x, as shown in Table 6.2-5. This would be less than the SMAQMD thresholds of significance, and would consequently be a *less-than-significant impact*. **(DEIR, pp. 6.2-216.2-22.)**

Mitigation Measures: The SMAQMD recommends that lead agencies require projects to reduce their ozone precursor emissions by 15%. The SMAQMD Guide provides a list of measures that can be used to achieve this 15% reduction. Each measure has an associated percentage point value. The SMCS Project has many of the listed measures built into its project design, and by virtue of the fact that it is located in downtown Sacramento where there is easy access to public transit. The Project Design includes the following:

Project site is located within ½ mile of an existing Class I or Class II bike lane and provides a comparable bikeway connection to that existing facility. (1 point)

Bus service provides headways of 15 minutes or less for stops within ¼ mile (1 point)

High density residential, mixed, or retail/commercial uses within ¼ mile of existing transit, linking with activity centers and other planned infrastructure. (1 point for bus only)

Office floor area ratio is 0.75 or greater within ¼ mile of an existing transit stop. (1.5 points for bus only)

Have at least three of the following on site and/or within ¼ mile: Residential Development, Retail Development, Personal Services, Open space, Office. (1 point)

Some shaded parking. (0.5points)

In addition to the six points listed above, as described in the Project Description in Chapter 2 of this DEIR, the following measures are components of the SMCS TSM Plan for the SMCS project. These measures have also been assigned points by the SMAQMD:

Preferential parking for carpools and vanpools. (0 5 points)

Provide Guaranteed Ride Home. (0.2 points)

Provide on-site transportation coordinator. (0.2 points)

Flextime. (0.2 points)

Provide showers and clothes lockers. (0.5 points)

Class I and Class II bicycle parking facilities. (0.5 points)

The SMCS shall also institute the following measures as part of the TSM plan once the project is built. These measures are also found in Chapter 2, Project Description and have been assigned point values by the SMAQMD as well:

- A Kiosk shall be provided displaying transportation information in a prominent area. (0.5 points)
- 100% monthly transit or vanpool subsidy (up to $100). (1.5 points)

(DEIR, p. 6.2-23.)

Compliance with Mitigation Measure 6.2-4 would provide the additional ozone precursor reductions needed to achieve the 15% recommended by the SMAQMD. However, this reduction would not reduce operational impacts to less than significant levels, in part, because most emissions associated with the project are the result of vehicle trips. This impact would remain a *significant and unavoidable impact*. (DEIR, p. 6.2-22 to -24.)

Significance After Mitigation: The SMCS Project would result in significant and unavoidable impacts. (DEIR, p. 6.2-22.)

The Theatre project would result in less than significant without mitigation. (DEIR, p. 6.2-22.)

Impact 6.2-5: Increase in CO concentrations from project-related traffic. (Less than Significant). (DEIR, p. 6.2-24.)

Finding: Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation:

As shown in Table 6.2-7 of the DEIR, although CO concentrations would increase at some intersections as a result of the SMCS Project when compared to No Project conditions, the modeling showed that 1-hour and 8-hour CO concentrations would not exceed the CAAQS.

Since the federal standard for CO is 15 ppm higher than the CAAQS, concentrations would also be below the federal standard. This would consequently be considered a ***less-than-significant impact.*** (DEIR, pp. 6.2-24.)

Mitigation Measures: None required. (DEIR, p. 6.2-25.)

Significance After Mitigation: The impact is less than significant without mitigation. (DEIR, p. 6.2-24.)

Impact 6.2-6: Increase in exposure of sensitive receptors to toxic air contaminants. (Less than Significant). (DEIR, p. 6.2-26.)

Finding: Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation: The SMCS Project could generate TACs associated with both project construction and operation. (DEIR, p. 6.2-26.) Grading, and building construction would involve the use of diesel-fueled construction equipment. As this equipment burns diesel fuel, it will produce diesel particulate matter, which has been classified by the CARB as a TAC. The CARB determined that the chronic impact of diesel particulate was of more concern than the acute impact in its *Risk Management Guidance for the Permitting of New Stationary Diesel-Fueled Engines* (CARB, 2000). In this document, the CARB noted that "Our analysis shows that the potential cancer risk from inhalation is the critical path when comparing cancer and noncancer risk. In other words, a cancer risk of 10 per million from the inhalation of diesel PM will result from diesel PM concentrations that are much less than the diesel PM or TAC concentrations that would result in chronic or acute noncancer hazard index values of 1 or greater." Consequently, any analysis of diesel TAC should focus on the long-term, chronic cancer risk posed by the diesel exhaust. As mentioned above, chronic cancer risk is normally measured by assessing what the risk to an exposed individual from a source of TAC would be if the exposure occurred over 70 years. (DEIR, p. 6.2-26.)

Since the construction activity associated with the SMCS Project would occur over the course of approximately four years, receptors in the vicinity of the SMCS Project area would be exposed to diesel emissions intermittently. These receptors would not be subject to continuous TAC exposure during construction, and the duration of the construction period would be far less than the 70-year time-frame normally used to assess chronic TAC impacts. (DEIR, p. 6.2-26.)

Operation: Sources of TACs associated with project operation include boilers as part of daily operations. TACs are regulated through the local air districts by the Air Resource Board as a result of the Air Toxics "Hot Spots" information and Assessment Act (AB 2588). Under AB 2588, once the new SMCS buildings and facilities are operational, SMCS would be required to report any new emissions sources to the SMAQMD. The SMAQMD would then make a determination as to whether a Health Risk Assessment (HRA) would be required as a result of the expansion. If a HRA is required, the SMAQMD would use the assessment to determine the significance of the SMCS for TACs. (DEIR, pp. 6.2-26 - 6.2-27.)

The SMCS has not been required to perform a HRA since the 1980's, when the facility operated a special sterilizer that produced TACs. Sutter has since removed the sterilizer and is no longer required to perform HRA's. If future expansion triggers the preparation of a HRA, however, and the HRA shows that there is a significant TAC impact, AB 2588 requires that the impact be reduced by the facility to a level that is less than significant. (DEIR, p. 6.2-27.)

It is not expected that the construction of these new uses would create significant new TAC sources. The SMCS Project is adding hospital space, building a new Energy Center, and adding a medical office building, additional parking, housing, and commercial/retail space. No new equipment would be included that could produce significant amounts of TAC. The equipment included in the newly expanded Energy Center would for the most part replace existing equipment, with possible increases to the horsepower of certain equipment. Almost all of the equipment would run on fuels other than diesel. Diesel-fueled backup generators would be included, for emergency situations. Use of these generators would only be allowed during emergency situations and for limited times during the year for testing purposes. Aside from new equipment, no new processes or activities would occur that could produce significant TAC. Consequently, the future uses would not be expected from current uses in the amount of TAC's produced. Even if new TAC sources did develop in the future, the required HRA would determine the TAC effect, and the TAC source would be required to reduce the impact. (DEIR, p. 6.2-27.)

Since the impact from construction equipment would be temporary and minimal, and since stationary TAC sources are expected to be minimal as well, the project's TAC impact would be considered ***less than significant***. (DEIR, p. 6.2-27.)

Theatre: It is not expected that the theatre would have any TAC generating equipment. Consequently, the theatre is not expected to create any TACs; therefore, this would be considered a *less-than-significant impact*. **(DEIR, p. 6.2-27.)**

Mitigation Measures: None required. *(DEIR, p. 6.2-27.)*

Significance After Mitigation: The impact is less than significant without mitigation. (DEIR, p. 6.2-26.)

<u>Impact 6.2-7:</u> The SMCS Project, in combination with other projects proposed within the SVAB, could result in a significant temporary cumulative air quality impacts from construction activities. (Less than Significant with Mitigation). (DEIR, p. 6.2-28.)

Finding: This impact can be minimized through Mitigation Measures 6.2-5 and 6.2-6. (DEIR, p. 6.2-28.) Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant environmental effect as identified in the DEIR.

Explanation:

The SMCS Project would temporarily generate emissions for the duration of the construction activity. These construction-related emissions of pollutants would combine with other emission sources in the vicinity of the SMCS Project area. Criteria pollutants normally associated with construction are particulate matter and NO_x. ROG, an ozone precursor, is not normally generated in large in large amounts by heavy-duty construction equipment. Diesel particulate

matter is also generated by construction equipment's diesel fuel combustion and is a TAC issue. (DEIR, p. 6.2-28.)

The area surrounding the project area is a high-density urban area. As such, there are few existing sources of particulates. However, data from the closest SMAQMD monitoring station shows that the State standard for PM_{10} was exceeded eight times in the last three years, so PM_{10} concentrations could be an issue in the vicinity of the SMCS Project area. As discussed in Impact 6.2-2, because of the relatively small size of the graded area, fugitive dust generated by construction could be reduced to levels that are less than significant. Any remaining dust would be in amounts small enough that the effect would not be cumulatively considerable. (DEIR, p. 6.2-28.)

While PM_{10} is a criteria pollutant that has impacts in the area where it is generated, NO_x is an ozone precursor that can add to ozone impacts regionally. Since ozone is a regional problem in the Sacramento area and the SVAB is in an ozone nonattainment area, any NO_x that is generated by project-related construction activity could conceivably contribute to one or more violations of the ozone standard. While the project's construction NO_x impact may appear to be small when viewed in context with all other NO_x sources in the region, its impact would be considered cumulatively considerable. Most large stationary sources of NO_x in the County have been regulated and have limited their emissions, and mobile sources make up an increasing percentage of the NO_x inventory. With this in mind, the NO_x problem is not caused primarily by large sources, but a combination of many smaller sources. Consequently, for the duration of the SCMS construction period, NO_x emissions from heavy-duty equipment would be generated in amounts that are cumulatively considerable. Therefore, the project would be considered to be contributing to a significant cumulative impact. (DEIR, pp. 6.2-28 - 6.2-29.)

As discussed in Impact 6.2-6, construction activity would also produce TAC emissions. These emissions would be temporary, and there are no other substantial sources of TACs in the project vicinity that could combine with construction TACs to produce any significant impacts. (DEIR, p. 6.2-29.)

Because of the SMCS' cumulatively considerable construction NO_x impact, the SMCS Project's construction would cause a ***short-term, cumulatively significant impact***. (DEIR, p. 6.2-29.)

Theatre

As with the SMCS Project, construction emissions of NO_x from the Children's Theatre project would combine with other emission sources and could contribute in the short-term to an ozone impact. The impact would be cumulatively considerable because the NO_x inventory for Sacramento County is not dominated by large sources, but by many individual small sources. Consequently, this would be a ***short-term, cumulatively significant impact***. (DEIR, pp. 6.2-29.)

Mitigation Measures: Implementation of Mitigation Measures 6.2-5 and 6.2-6 would reduce the cumulative effect of NO_x generated during construction of the SMCS and the Theatre project to a *less-than-significant level*. This is because prohibiting construction on high AQI days would keep project construction activities from contributing to any exceedance. (DEIR, pp. 6.2-20 -21; 6.2-28 thru -29.)

Also, mitigation measures applied in Impact 6.2-3 would help reduce cumulative NO_x from construction activities.

Significance After Mitigation: The impact is less than significant after mitigation. (DEIR, p. 6.2-28.)

Impact 6.2-8: The SMCS Project, in combination with other projects in the SVAB could result in a cumulative impact on criteria pollutants associated with project operation. (Significant and Unavoidable for SMCS Project; Less than Significant for the Theatre). (DEIR, p. 6.2-30.)

Finding: Changes or alterations have been required in, or incorporated into, the SMCS Project that substantially lessen, but do not avoid, the Project's significant effects associated with air quality criteria pollutants. No mitigation is available to render the effects less than significant. The effects therefore remain significant and unavoidable.

For the Theatre, the impacts are less than significant and no mitigation measures are required. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation:
As discussed in Impact 6.2-4, operations of the SMCS Project would be significant according to the SMAQMD's published thresholds for project impacts. The SMAQMD's 1994 Air Quality Thresholds of Significance guidance states that development would be cumulatively significant if the project requires a change in the existing land use designation (i.e., general plan amendment, rezone), and the new land use is more intensive than the existing use.

The SMCS Projects would require a change to existing general plan designations and a zoning change. Approximately 1.5 blocks currently designated in the General Plan as "High-Density Residential" would be changed to a "Community/Neighborhood Commercial and Offices" designation. Six parcels currently zoned as "Office", and three parcels currently zoned "Multi-Family Residential" would be rezoned to "General Commercial". In both cases, the new land use would be more intensive than the existing land use, in that more vehicle-trips would be generated. Because this new activity would not be accounted for in the Sacramento Regional Ozone Attainment Plan, the impact from project operations would have a ***significant cumulative impact***. (DEIR, p. 6.2-30.)

Theatre:
As discussed above, the SMAQMD considers a project's operational emissions to be cumulatively considerable if the project would require a change in land use designation, and the proposed use is more intensive than the existing land use. Since the Children's Theatre would require no such change, the impact is less than significant and would be a ***less-than-significant cumulative impact***. (DEIR, p. 6.2-30.)

Mitigation Measures: The mitigation measures implemented in Impact 6.2-4 and 6.2-7 would also reduce the proposed project's cumulative impacts. However, the impact would remain *cumulatively significant and unavoidable*. (DEIR, p. 6.2-30.)

Significance After Mitigation: Significant and unavoidable. (DEIR, p. 6.2-30.) The Theatre project would result in less than significant cumulative impacts without mitigation. (DEIR, p. 6.2-30.)

Impact 6.2-9: Cumulative impact of CO concentrations from project-related traffic. (Less than Significant). (DEIR, p. 6.2-31.)

Finding: Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation:

The traffic study prepared for the proposed project predicts future (2025) traffic volumes at nearby intersections for both project and no-project scenarios. This evaluation also takes into account traffic from other sources that would be in existence at this future date. Maximum CO concentrations were determined by conducting modeling at the intersections that would have LOS of "D" or below in 2025. Tables 6.2-8 and 6.2-9 of the Draft EIR show the LOS and expected maximum one-hour and eight-hour CO concentrations for these intersection in 2025 under both project and no-project scenarios. Consequently, CO concentrations in 2025 under "smart plan" conditions for both project and no-project scenarios were modeled as well. The results of this modeling are shown in Tables 6.2-10 and 6.2-11. As shown on Tables 6.2-8 and 6.2-9, even though LOS may be degraded in the future, CO levels under any scenario would not exceed the CAAQS for CO. This would be a ***less-than-significant cumulative impact***. (DEIR, p. 6.2-31.)

Theatre

The 2025 traffic volumes predicted in the traffic study include trips generated by the Children's Theatre of California. As discussed above, modeled CO levels at the most congested intersections would not be in excess of the CAAQS. Consequently, theatre-related traffic would not contribute to CO concentrations that would violate SMAQMD thresholds of significance. This would be a ***less-than-significant impact***. (DEIR, p. 6.2-31.)

Mitigation Measures: *None required.* (DEIR, p. 6.2-31.)

Significance After Mitigation: The impact is less than significant without mitigation. (DEIR, p. 6.2-31.)

Impact 6.2-10: Cumulative impact of project-generated TACs. (Less than Significant). (DEIR, p. 6.2-34.)

Finding: Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation:

As discussed in "Existing Emissions Sources and Concentrations", the SMCS Project area is located in an area that the CARB has identified as having a background cancer risk of between 750 and 1000 in one million. These background levels are already in excess of the TAC significance standard of 10 in one million. The high TAC level is mainly due to heavy-duty diesel trucks. The Sutter facilities would be subject to the requirements of AB 2588 that mandates that facilities report their emissions and reduce their TACs to levels that are less than significant. Consequently, the SMCS contribution to overall TAC levels would not be cumulatively significant because it would generate very small amounts of TAC, and other sources play a much larger role in creating the high cancer risk in Sacramento County. The SMCS would have a ***less-than-significant cumulative impact***. (DEIR, p. 6.2-34.)

Theatre

The Children's Theatre of California is not expected to produce any TACs. In any case, the Theatre would be subject to AB 2588 that requires facilities to reduce their TAC emissions to less than significant levels. The background TAC level is already high, and is mostly caused by diesel truck traffic. Consequently, the Theatre would have little to no impact, and would not be cumulatively considerable when viewed with other TAC producing sources. This would be a ***less-than-significant cumulative impact***. (DEIR, p. 6.2-34.)

Mitigation Measures: *None required.* (DEIR, p. 6.2-34.)

Significance After Mitigation: The impact is less than significant without mitigation. (DEIR, p. 6.2-34.)

C. CULTURAL RESOURCES

Impact 6.3-1: Construction of the SMCS and Theatre projects could adversely affect known and/or previously unidentified prehistoric or historic archaeological resources. (Less than Significant after Mitigation). (DEIR, p. 6.3-16.)

Finding: This impact can be minimized through Mitigation Measure 6.3-1. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant environmental effect as identified in the DEIR.

Explanation:

The proposed SMCS Project is in close proximity to known archeological resources that could be adversely affected by construction of the project. Previously undiscovered archeological subsurface material could also be present within the SMCS Project area due the previously described sensitivity of the area. Proposed construction for the SMCS Project includes several subsurface components; some areas could be excavated as much as 35 feet below the surface. Subsurface construction activities such as excavation, drilling for new building pilings, etc. have the potential to impact unknown buried cultural resources. The use of necessary equipment to conduct such activities could damage or destroy these subsurface resources. An Unanticipated Discovery Plan is required in consultation with the Native American groups to establish procedures for the treatment of Native American burials and associated grave goods. This plan ensures coordination between the City, SMCS, the archaeological consultant, and the Most

Likely Descendant, if human remains are discovered. The plan must be completed prior to the start of any construction activities (DEIR, pp. 6.3-16 – 6.3-17.)

The SMCS Project area is also considered sensitive for subsurface prehistoric deposits; historical resources sensitivity is even greater. Due to the extensive historical use of the area and the fact that original Sutter's Fort structures were located outside of the present day park and block boundaries, there is also a strong potential for encountering historic subsurface features (e.g., privy pits, refuse dumps, and architectural foundations) associated with the earliest pre-Gold Rush and Gold Rush-era settlers, as well as material remains of later era residents. Due to the potential for the presence of sub-surface artifacts, this would be considered a ***potentially significant impact.*** (DEIR, p. 6.3-17.)

Theatre

The site of the proposed Theatre project, as is also true of the SMCS project, is in close proximity to known archeological resources that could be adversely affected by implementation of the project and is in an area of high archaeological sensitivity. Previously undiscovered archeological subsurface material could also be present within the Theatre site. (DEIR, p. 6.3-17.) The overall project area, including the Theatre site, is also considered sensitive for subsurface prehistoric deposits and historical resources associated with the earliest pre-Gold Rush and Gold Rush-era settlers, as well as material remains of later era residents. Due to the potential for the presence of sub-surface artifacts, this would be considered a ***potentially significant impact***. (DEIR, p. 6.3-17.)

Mitigation Measures: Implementation of Mitigation Measure 6.3-1 would reduce impacts to known and previously undiscovered archaeological resources that could be caused by construction of the SMCS and Theatre projects to a *less-than-significant level* by ensuring that proper procedures are followed in the event any known or unknown resources are unearthed during project construction. (DEIR, p. 6.3-17 to -18.)

Significance After Mitigation: The impact is less than significant after mitigation. (DEIR, p. 6.3-17.)

Impact 6.3-2: Construction of the SMCS and Theatre projects could adversely affect the significance of any or all of the following historical resources: Old Tavern, Pioneer Congregational Church, Sutter's Fort, Eastern Star Hall, Capitol Commercial Building, and the residence on the 2600 Block of the Capitol Mansions Historic District. (Less than Significant after Mitigation). (DEIR, p. 6.3-18.)

Finding: These impacts can be reduced to less than significant levels through implementation of Mitigation Measures 6.3-2 and 6.3-3. Impacts resulting from the Theatre will also be less than significant through implementation of Mitigation Measure 6.3-2. Changes or alterations have therefore been required in, or incorporated into, the project which mitigate or avoid the significant environmental effect as identified in the DEIR.

Explanation:

The SMCS Project area is in close proximity to known historical resources that could be adversely affected by the project. Buildings within the SMCS Project area and those in the vicinity that could be affected by development of the various project components were evaluated

for significance. (DEIR, p. 6.3-18.) The SMCS Project would involve construction immediately adjacent to two designated historical resources:

Old Tavern building, and

Pioneer Congregational Church.

(DEIR, p. 6.3-18.)

The project would also involve construction in the vicinity of the following historical resources:

Sutter's Fort,

Eastern Star Hall,

Capitol Commercial Building, and

the 2600 Block of the Capitol Mansions Historic District.

(DEIR, p. 6.3-18.)

No designated building, or building which has been evaluated as eligible for listing on the California Register of Historical Resources, or any contributor to a historic district, would be demolished as a result of the project. Pioneer Church is the only building in a historic district that could be affected by the SMCS Project through construction occurring in close proximity to the Church. (DEIR, pp. 6.3-18 – 6.3-19.)

Construction of the Women's and Children's Center (WCC) would also require new building foundations that would be constructed using drilling equipment for new piles. The building foundations would not be constructed using pile drivers, however. The proposed construction method would be drilling and insertion of piles at specific locations. Drilling, as opposed to pile driving, would cause less ground vibration. However, vibration associated with drilling activities could result in potentially significant adverse effects to historical resources adjacent to and in the vicinity of the project area. Because structures over 50 feet away from drilling activities would not be significantly impacted by vibration caused by construction activities, the number of historic buildings that could be affected by the SMCS Project is limited to the Old Tavern and Pioneer Congressional Church during construction of the WCC and the SMF Building. (DEIR, p. 6.3-19.)

Old Tavern Building

The SMCS Project requires removal of existing non-historic structures that are adjacent to the Old Tavern building to clear the site for construction of the WCC. (DEIR, p. 6.3-19.)

The exposed eastern wall of the Old Tavern building would require rehabilitation after the removal of the adjacent parking structure, which is a component of the SMCS Project. At a minimum it is likely that stabilization and repainting would be necessary. New openings for doors and windows could also be added. The rehabilitation proposes to reflect the current design of the Old Tavern building and draw from existing design elements in order to match the design. (DEIR, p. 6.3-19.)

Pioneer Congregational Church

Vibrations from construction activities associated with the SMCS Project could have significant adverse effects on existing stained glass windows in the Pioneer Congregational Church. Stained glass windows could be vulnerable to damage from vibration from drilling or demolition activities associated with the project. In addition, damage to historic properties could result from the operation of equipment, excess vibration levels or lack of knowledge regarding proper safeguards for protecting and monitoring historic properties. Drilling was used during the construction of the SGH in the mid-1980s and no damage occurred to surrounding properties at that time. (DEIR, p. 6.3-19.)

Sutter's Fort

The Fort consists of four adobe brick walls 18 feet tall and 2 ½ feet thick, enclosing an area of approximately three acres (2 city blocks). The inner courtyard is occupied by a two-story central adobe building and a number of smaller buildings and structures arranged around the interior of the walls. The central building is the only original building to survive from the original 1840 Fort constructed by John Sutter. The adobe brick walls are not reinforced and are therefore vulnerable to outside influences such as construction in the area. The Department of Parks and Recreation has expressed concerns over construction activity within close proximity to the Fort and the potential damage that could result to these adobe structures. (DEIR, pp. 6 3-19 – 6.3-20.)

The SMCS Project would use drilling instead of pile driving during the construction of proposed buildings, which would reduce potential impacts. The potential for significant adverse effects from vibration could potentially have more impact on the adobe brick construction of Sutter's Fort than it would on other structures in the area. Sutter's Fort is not located within 50 feet of any proposed construction; therefore, it is not anticipated that it would be affected. However, Mitigation Measure 6.2-3 (a), detailed below, requires that a study be prepared to assure the nearby structures, such as Sutter's Fort, are not adversely impacted by vibration associated with project construction activities. (DEIR, p. 6.3-20.)

Historic Context and Features

The construction of an 8-story hospital building (WCC) to the east and a 4-story, medical office building (SMF Building) to the west across 28th Street from the Old Tavern Building could alter the setting of the Tavern Building and separate it from the historic streetscape and adjacent neighborhood. However, there is no existing historic streetscape in this area. The Old Tavern Building is a single historic structure in a modern setting. Development of the WCC and the SMF Building in this location would change the existing environment through the construction of new buildings, but it would not change an existing historic streetscape or remove any designated historic resources. The historic cut-stone curb that exists along 28th Street could be damaged by construction equipment. The design plans for the WCC establish a wide separation between the new construction and the historic Tavern building. This separation is further enhanced by the planned transparency of the first floor/lobby elevation of the WCC minimizing the visual interaction of the two buildings The SMF Building would replace existing

non-historic buildings located along 28th Street with a 4-story structure, similar in height to the Tavern Building.

As discussed above, construction activities could adversely impact the Old Tavern Building including the historic cut-stone curb that exists along the east side of 28th Street and/or the Pioneer Congregational Church. Due to the close proximity of these historic structures to the SMCS project area construction activities could result in a ***potentially significant impact***. (DEIR, p. 6.3-20.)

Theatre

Vibrations from construction activities associated with the Theater construction could have significant adverse effects on existing stained glass windows in the Trinity Cathedral if it is not demolished prior to the beginning of Theatre construction. Stained glass windows could be vulnerable to damage from construction or demolition activities associated with the project. In addition, damage to historic properties could result from carelessness in the operation of equipment, excess vibration levels or lack of knowledge regarding proper safeguards for protecting and monitoring historic properties. (DEIR, p. 6.3-20.)

Mitigation Measures: Implementation of Mitigation Measures 6.3-2 and 6.3-3 would reduce impacts to historical resources that could be caused by demolition and drilling during construction, excavation under or adjacent to existing foundations of the Old Tavern building and Pioneer Congregational Church, or restoration/rehabilitation of the east wall of the Old Tavern building to *less-than-significant levels*. (DEIR, p. 6.3-21 to -22.)

Significance After Mitigation: Less than significant after mitigation. (DEIR, p. 6.3-20 thru -21.)

Impact 6.3-3: The SMCS Project could directly or indirectly destroy a unique paleontological resource or unique geologic feature. (Less than Significant). (DEIR, p. 6.3-23.)

Finding: Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation:

The SMCS Project area is located in a developed urban environment. The various project components would be developed on urban lots, all of which have been developed with either existing buildings and/or previously contained structures. All of the blocks slated for construction have all been previously disturbed and there are no unique geologic features present at the surface. The abundance and diversity of fossils can potentially vary widely from place to place, with paleontological resource sensitivity likewise varying according to geologic rock unit. However, there are no known paleontological resources within the SMCS Project area. Therefore, this would be a ***less-than-significant impact.*** (DEIR, p. 6.3-23.)

Mitigation Measures: None required. *(DEIR, p. 6.3-23.)*

Significance After Mitigation: The impact is less than significant without mitigation. (DEIR, p. 6.3-23.)

Impact 6.3-4: The SMCS Project, in combination with other development in the City, could substantially adversely alter archaeological resources, which could result in a significant cumulative impact. (Less than Significant after Mitigation). (DEIR, p. 6.3-24.)

Finding: This impact can be reduced to less than significant levels through implementation of Mitigation Measure 6.3-4. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant environmental effect as identified in the DEIR.

Explanation:
While cumulative development throughout Sacramento would be anticipated to impact resources, it must be noted that many of the areas that are proposed for development are urban in character and have been build upon previously. Earlier development may have destroyed sites, resulting in the inadvertent dispersal or reduction in quality of artifacts or resources. (DEIR, p. 6.3-24.)

Artifacts and other cultural resources have been recorded during prior surveys near the SMCS Project and Theatre areas and throughout the City and County of Sacramento. Therefore, development of the SMCS Project or the Theatre project, in combination with other development in the City of Sacramento, could contribute to the potential loss of significant archaeological and prehistoric resources due to the location near Sutter's Fort and Indian settlements. (DEIR, p. 6.3-24.)

Because all significant cultural resources are unique and non-renewable members of finite classes, all adverse effects or negative impacts erode a dwindling resource base. The loss of any one archaeological site affects all others in a region because these other properties are best understood completely in the context of the cultural system of which they (and the destroyed resource) were a part. The boundaries of an archaeologically important site could extend beyond the property boundaries. (DEIR, p. 6.3-24.)

Mitigation Measures: Implementation of mitigation measures 6.3-4 and 6.3-1 will ensure that in the event that subsurface resources are discovered, they would be preserved and their treatment would be consistent with professional standards for cultural resources. Therefore, neither the SMCS Project nor the Theatre project would contribute to the loss of archeological or paleontological resources, and the contribution of either to the cumulative loss would be *less than significant*. (DEIR, pp. 6.3-24, 6.3-16.)

Significance After Mitigation: The impact is less than significant after mitigation. (DEIR, p 6.3-24.)

Impact 6.3-5: The proposed SMCS Project could, in combination with other development in the City, substantially adversely alter historical resources, which could result in a significant cumulative impact. (Less than Significant after Mitigation) (DEIR, p. 6.3-25.)

Finding: This impact will be reduced to less than significant levels through implementation of Mitigation Measure 6.3-5. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant environmental effect as identified in the DEIR.

Explanation: The cumulative context for the evaluation of potential cumulative impacts on historical resources is the buildout of the City of Sacramento General Plan. Cumulative development in the city could result in the damage or destruction of known historical resources. Sacramento has an array of historical resources. General Plan goals and policies as well as the

City's Historic Preservation Ordinance work to prevent the loss of historical resources. (DEIR, p. 6.3-25.) Despite the potential for the cumulative loss of historic structures upon buildout of the Sacramento General Plan, development of the SMCS Project would not result in the loss of significant historical resources or structures. (DEIR, p. 6.3-25.)

Mitigation Measures: Implementation of Mitigation Measures 6.2-5, 6.3-2 and 6.3-3 would ensure that precautions are taken during construction to avoid damage to historic structures, that restoration of the Old Tavern is performed to ensure that it retains its unique character, and that the proposed development is designed such that it does not alter the context of the historic districts. Therefore, this measure would ensure that the project's contribution to cumulative alterations in the character of historical resources would be *less than significant*. (DEIR, p. 6.3-21, 23, 25.)

Significance After Mitigation: The impact is less than significant impact after mitigation. (DEIR, p. 6.3-25.)

<u>Impact 6.3-6:</u> The SMCS Project, in combination with other development in the City, could substantially adversely alter paleontological resources, which could result in a significant cumulative impact. (Less than Significant after Mitigation) (DEIR, p. 6.3-26.)

Finding: This impact will be reduced to less than significant levels through implementation of Mitigation Measure 6.3-6. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant environmental effect as identified in the DEIR.

Explanation:
While cumulative development throughout Sacramento would be anticipated to impact paleontological resources, many of the areas that are proposed for development are urban in character and have been built upon previously. Earlier development may have destroyed sites, resulting in the inadvertent dispersal or reduction in quality of resources. The development of the proposed project, in combination with other developments in Sacramento, could contribute to the potential for loss of significant paleontological resources. (DEIR, p. 6.3-26.)

Because all paleontological resources are unique and non-renewable members of finite classes, all adverse effects or negative impacts erode a dwindling resources base. The loss of any one site affects all others in a region because these other properties are best understood completely in the context of the region of which they (and the destroyed resource) were a part. The boundaries of an important site could extend beyond the property boundaries resulting in a ***potentially significant impact***. (DEIR, p. 6.3-26.)

Mitigation Measures: Implementation of mitigation measure 6.3-6 would ensure that in the event that subsurface resources are discovered, they would be preserved and their treatment would be consistent with professional standards for cultural resources. Therefore, the SMCS Project would not contribute to the loss of paleontological resources, and its contribution to the cumulative loss would be less than considerable resulting in a *less-than-significant cumulative impact*. (DEIR, pp. 6.3-26, 6.3-17.)

Significance After Mitigation: The impact is less than significant cumulative impact after mitigation. (DEIR, p. 6.3-26.)

D. *HAZARDOUS MATERIALS AND PUBLIC SAFETY*

Impact 6.4:1:

Existing buildings demolished to accommodate the SMCS Project are known to contain or may contain asbestos or lead-based paint or other hazardous substances, which could be released to the environment during demolition if not properly removed, contained, and transported for disposal at approved sites. (Less than Significant after Mitigation) (DEIR, p. 6.4-21.)

Finding:

This impact can be minimized through implementation of Mitigation Measure 6.4-1. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant environmental effect as identified in the DEIR.

Explanation:
Construction of the SMCS Project would involve the demolition or removal of several buildings. The St. Luke's Office Medical Building, MTI Building, EAP Building, and House of Furs building have been tested and found to contain asbestos-containing building material (ACBM). Only the House of Furs building has been tested for lead-based paint, which was detected in some older parts of the building. Prior to any planned demolition or renovation that may disturb ACBM or lead-based paint, these materials must first be removed and disposed of by a certified contractor, as noted in the test reports for these buildings. (DEIR, p. 6.4-21.)

Because the three other buildings that would be demolished to accommodate the SMCS Project (Energy Center, (former) RAS Building, and a private medical office were constructed between the late 1970s and 1980s, it is unlikely the building components contain asbestos or lead-based paint. However, without test results this cannot be confirmed. Such testing has not been performed to date, so there is the potential demolition of these structures could result in the inadvertent release or improper disposal of debris containing these materials. (DEIR, p. 6.4-21.) As with asbestos and lead, demolition of structures could result in the inadvertent release or improper disposal of debris containing other hazardous materials, exposure to which can result in adverse human health effects. (DEIR, p. 6.4-21.)

During the occupancy and use of the (former) RAS Building, a 1,300-sf private medical office building, and St. Luke's Medical Office Building, it is possible hazardous substances such as mercury from broken thermometers may be present in sink traps. Other hazardous substances may also have been similarly disposed, leaving residual material in pipes. Testing for the presence of such materials and dismantling of plumbing fixtures would require careful removal techniques to ensure contractors are not inadvertently exposed to hazardous substances. In addition, contaminated debris could be inadvertently disposed of at a landfill or recycling facility not permitted to accept such waste, which could expose workers to potential safety hazards or result in environmental exposure, if hazardous substances are not properly identified in advance.
(DEIR, p. 6.4-21.) Given the types of medical uses and relatively small number of fixtures in these buildings, it is likely the number of fixtures and amount of material potentially containing hazardous substances would be relatively limited, however. (DEIR, p. 6.4-22.)

Theatre

The EAP Building and Trinity Apartments would be demolished to accommodate the proposed Theatre. The EAP Building has been found to contain ACBM, which would require removal by a certified abatement contractor. Due to the age of the building, it may contain lead-based paint. The Trinity Apartments may contain asbestos and/or lead-based paint. Both buildings may contain electrical equipment with PCBs. As described for the SMCS Project, demolition and disposal of material containing hazardous substances could present a health or environmental hazard if not properly managed. (DEIR, p. 6.4-22.)

Mitigation Measures: Implementation of Mitigation Measure 6.4-1 will ensure that ACBM, lead-based paint, or other hazardous substances in building components are identified, removed, packaged, and disposed of in accordance with applicable State laws and regulations. This would minimize the risk of an accidental release of hazardous substances that could adversely affect human health or the environment, thus reducing impacts to a *less-than-significant level*. (DEIR, p. 6.4-22, -23.)

Significance After Mitigation: The impact is less than significant after mitigation. (DEIR, p. 6.4-22.)

Impact 6.4-2: Site preparation activities associated with the SMCS Project (excavation, grading, trenching) have the potential to encounter previously unidentified contaminated soil or groundwater or buried debris that may contain hazardous substances. (Less than Significant after Mitigation). ***(DEIR, p. 6.4-23.)***

Finding: ***This impact will be reduced to less than significant levels through implementation of Mitigation Measure 6.4-2. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant environmental effect as identified in the DEIR.***

Explanation:

Buildings within the SMCS proposed for below-grade construction activities include: the Community Parking Structure, Future Medical Office Building, SMF Building, the Women and Children's Center, and connector tunnels. Excavations for these structures would disturb soil and may encounter groundwater. The results of Phase 1 ESAs indicate there are no known soil or groundwater contamination issues at the site, and the locations of known USTs have been determined. (DEIR, p. 6.4-23.)

Although the project applicant has no knowledge of such occurrences, the potential exists for historic site uses to have resulted in undocumented releases of hazardous substances to soil or groundwater. For example, items such as old heating fuel USTs predate current permitting and regulatory requirements, so the location(s) of such features may not be known. Leaks from old tanks could have resulted in a release of petroleum products to soil or groundwater. The accidental discovery of unknown hazards during excavation and inadvertent release of hazardous materials could create a significant hazard to the public or the environment if measures are not in place to safely manage such occurrences. This was considered a ***potentially significant impact***. (DEIR, p. 6.4-23.)

Should contamination be detected in areas to be disturbed, in areas directly adjacent to sites to be developed, or in areas open to public access, remediation of the contaminated areas would be necessary in most cases. Remediation would include, at a minimum, treatment of

contaminated soils in a manner that would render them non-hazardous or otherwise protect public health and safety. Proper treatment and/or disposal of soils and groundwater could also be required. As discussed in Impact 6.5-2 in Section 6.5, Hydrology and Water Quality, the City has specific requirements for the disposal of contaminated groundwater. (DEIR, p. 6.4-23.)

Potential adverse impacts of remediation would be mitigated, in part, by legally required safety and hazardous waste handling and transportation precautions. For hazardous waste workers, OSHA regulations mandate an initial 40-hour training course and subsequent annual training review. Additionally, site-specific training would be required for some workers. In responsible agency review of mitigation plans, procedures for protection of the public during remediation would be evaluated. These measures, along with application of state and regional cleanup standards, would serve to protect human health and environment during site remediation, thus minimizing remediation impacts. (DEIR, p. 6.4-23.)

Remediation of contaminated sites would eliminate the health threats posed by hazardous wastes and prevent workers and the public from encountering such materials in the event of any future excavation at the site. Removal of the toxic materials would also eliminate a potential local source of groundwater contamination; therefore, removal would be beneficial in the long run. Proper handling and disposal of excavated contaminated material would preempt potential health, safety, or environmental effects of the contaminated soil or groundwater. (DEIR, p. 6.4-23.)

Theatre

Construction of the Theatre could involve site preparation activities such as excavation, grading, and possibly dewatering. During such activities, contaminated soil or groundwater, underground storage tanks, or other hazardous debris could be encountered, as described for the SMCS Project. Unless properly managed, construction and remediation could create a health hazard. This is considered to be a ***potentially significant impact.*** (DEIR, pp. 6.4-24.)

Mitigation Measures: Implementation of Mitigation Measure 6.4-2 will reduce potential impacts to less than significant levels by requiring site inspections at each location to determine the likelihood of contaminants within the site boundaries, removal or remediation of hazardous materials, and appropriate conditions outlining procedures in the event that previously unknown hazardous debris, soil, or groundwater contamination is discovered during construction. Therefore, implementation of the mitigation measure would reduce construction-related impacts associated with exposure to hazardous materials to a *less-than-significant level.* (DEIR, p. 6.4-24, 25.)

Significance After Mitigation: The impact is less than significant after mitigation. (DEIR, p. 6.4-25.)

Impact 6.4-3: Construction and operation of the SMCS Project would result in the continued routine use, storage, transport, and disposal of hazardous materials. (Less than Significant). (DEIR, p. 6.4-25.)

Finding: ***Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)***

Explanation:
Implementation of the SMCS Project would not create a significant hazard to the public, employees or the environment through the routine transport, use, or disposal of hazardous materials, or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. All non-medical activities discussed in the Draft EIR would not require the use of hazardous materials to the extent which would create a significant impact. All medical activities would be regulated by federal, State, and local laws that are incorporated into SMCS's Environment of Care Manual. The WCC Building and a portion of the SMF Building, moreover, would be surveyed for hospital-based services every three years by JCAHO and the California Department of Health Services (Licensing & Certification) to ensure compliance with JCAHO standards and California Code of Regulations (CCR), Title 22 (Hospital Licensing and Certification) regulations, which include hazardous materials management provisions. Therefore, construction or operation of the SMCS Project would have a ***less-than-significant impact***. (DEIR, p. 6.4-26 thru 28.)

The following describes the construction and operational features of the proposed project and how hazardous materials exposure could occur and methods to control such exposures.

Construction

Construction of the SMCS Project would involve the use of various products that could contain materials classified as hazardous (e.g., solvents, adhesives and cements, certain paints, cleaning agents and degreasers). Fuels, such as gasoline and diesel, would also be used in heavy equipment and other construction vehicles. The use and storage of such products is subject to applicable hazardous materials regulations, and contract specifications would contain specific provisions regarding the use of these products to ensure compliance with applicable regulations and standards. Because applicable hazardous materials laws and regulations would be implemented as standard procedure for construction of the proposed project through contractor specifications and monitored by the applicant, the impact of construction-related hazardous chemical use and storage would be less than significant. (DEIR, p. 6.4-26.)

Medical Facilities Operation

Occupancy and operation of the medical buildings proposed for development by SMCS would require the routine transport, use or disposal of hazardous materials, while the non-medical buildings would rarely contain or require hazardous materials. Similar to existing conditions with Sutter General Hospital and the Buhler Building, the proposed WCC and SMF Building would involve the use of hazardous materials in research, patient care, and routine maintenance and repair activities. Such materials would include a variety of chemicals, radioactive materials, and maintenance products. Biohazardous materials and medical wastes, along with chemical and radioactive waste, would be generated. (DEIR, p. 6.4-27.)

The use of hazardous materials would not be a new use at the site when the proposed facilities become occupied. However, because there would be a net increase in patients diagnosed and treated at the site, as compared to existing conditions, there would be an increase in the amount of materials used on-site. The types of materials would not change substantially, and the materials would generally be stored in small, individual containers of about five gallons or less except for the few HMP-reportable products that are stored in large quantities. Therefore, the

probability of a major hazardous materials incident would be relatively low. Minor incidents would be more likely, but the consequences of such accidents would probably not be severe due to the typically small quantities of materials handled at any particular time and the equipment and training provided to SMCS facilities staff. (DEIR, p. 6.4-27.)

The project-related effects of hazardous materials handling and storage would generally be limited to the immediate areas where the materials would be located, because this is where exposure would be most likely. For this reason, the individuals most at risk would be hospital employees or others in the immediate vicinity of the hazardous materials. While the use and handling of hazardous materials would increase in accordance with the increase in patients, strict rules and regulations minimize the risk of public exposure to hazardous materials. As part of its standard procedures, the WCC and SMF Building would implement Environmental Health and Safety (EHS) programs like those already in use at SGH. EHS programs are designed for compliance with applicable laws, regulations, and accreditation standards, for the safety of patients, staff, and visitors, and to protect the environment. As with the existing facilities, the Environment of Care Manual would continue to direct how hazardous materials (including wastes) are managed at the new facilities developed as part of the SMCS Project. The health and safety procedures that protect workers and other individuals in the immediate vicinity of hazardous materials would also protect the adjacent community and environment. (DEIR, p. 6.4-27.)

SMCS maintains an emergency response plan to ensure that staff can respond to possible hazardous materials emergencies. In general, spills of less than one-half to one liter (about two to four quarts) are cleaned up by hospital staff. For some materials (e.g., formaldehyde), spills larger than one-half liter are required to be cleaned up by an outside hazardous materials team. The City Fire Department provides "first response" capabilities to identify and secure access to hazardous materials incidents. The Fire Department HazMat team has not been called upon to respond to any hazardous materials spill incidents at existing SGH or Buhler Building facilities within the last five years. Only one incident involving a release of hazardous materials to the environment has occurred at the SGH, which involved ethylene oxide (EtO). EtO is a gas that was used in sterilizing equipment and is classified as a toxic air contaminant (TAC). The incident did not require HazMat team response, but several agencies, including the Sacramento Metropolitan Air Quality Management District, were involved in subsequent enforcement actions. The use of EtO has been discontinued (see Impact 6.2-6 in Section 6.2, Air Quality), and current methods involve the use of steam and hydrogen peroxide, as noted in the Environmental Setting in this section. Other jurisdictions are available, if necessary, to support the City through mutual aid agreements. The increase in hazardous materials use would not substantially affect the demand for hazardous materials emergency response services in Sacramento and would not substantially affect the availability or response times of emergency responders because the types of hazardous materials used would not change, only amounts kept at the proposed project. The likelihood of emergency incidents is more a function of the types of materials used as opposed to the quantities of materials used. Because the types of materials used would be similar in the future, SMCS's current emergency response plan would still be effective at responding to anticipated incidents associated with hazardous materials. (DEIR, p. 6.4-27-6.4-28.)

Aside from accidents possibly occurring on site, accidents during hazardous materials transport to and from the site could expose individuals and the environment to risks at some distance from the project site. Transportation of hazardous materials could increase the risk of exposure to workers and the public through accidental spills due to transportation-related accidents. However, transportation accidents are infrequent. According to the California Department of

Transportation, less than 3.12 vehicle accidents occur for every million vehicle miles traveled on major undivided urban highways. The frequency is substantially less on other types of urban highways. Moreover, DOT, USPS, and the California Department of Health Services Radiologic Health Branch and Medical Waste Program all specify packaging requirements for hazardous materials and wastes that limit the potential for packages to fail on impact. CHP regulations set forth requirements for testing of shipping containers, marking containers and vehicles, inspecting vehicles, and training drivers. These requirements reduce the potential for hazardous materials releases to occur in the unlikely event of an accident involving transportation of hazardous material to or from the project. (DEIR, p. 6.4-28.)

Energy Center

A new 11,000-gallon liquid oxygen tank and 3,000-gallon reserve tank would be located on the west side of the proposed SMF Building (see Figure 2-11 in Chapter 2, Project Description). The tanks would be surrounded by a 22-foot-high concrete wall; a portion of the wall would be metal louvers. The enclosure would be open at the top to provide adequate ventilation. As noted in the Environmental Setting, oxygen is not considered an acutely hazardous or toxic material and is nonflammable. It would be contained in pressurized tanks with leak control devices in a well-ventilated area. Tank design, installation, and operation would be subject to review by the City Fire Department to ensure compliance with applicable Uniform Fire Code requirements. Consequently, there is no evidence the tank would pose a significant health risk to nearby schools or the adjacent playground due to the release of a hazardous substance. (DEIR, p. 6.4-28.)

Relocation of the Energy Center and increased capacity would result in an increase in the amount of water treatment chemicals. This would represent an increase over existing conditions, but it would not introduce new or different chemical products compared to those currently in use and for which no special permitting or handling is required. Fuel tanks for the new Energy Center would be located underground, which would minimize the risk of accident or upset that could release hazardous materials to the environment where people could be directly exposed. (DEIR, p. 6.4-28.)

Theatre

The Theatre would be used for theatrical purposes that typically do not involve the routine transport, use, or disposal of hazardous materials. Common household-type chemicals may be used and stored within the site but these chemicals would not lead to a significant hazard to people or the environment. Therefore, this is considered a ***less-than-significant impact***. (DEIR, pp. 6.4-29.)

Mitigation Measures: *None required.* (DEIR, p. 6.4-29.)

Significance After Mitigation: The impact is less than significant without mitigation. (DEIR, p. 6.4-29.)

Impact 6.4-4: Implementation of the SMCS Project would involve the use, storage, and transport of hazardous materials, substances, or waste within ¼ mile of an existing or proposed school. (Less than Significant). (DEIR, p. 6.4-29.)

Finding: ***Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)***

Explanation:

The SMCS Project area is located within one-quarter mile of four schools, as described in the Environmental Setting section. The closest school is approximately 150 feet west of the proposed SMF Building. (DEIR, p. 6.4-29.)

Demolition of existing structures has the potential to release asbestos or lead-based paint into the air, which could migrate to nearby schools. As discussed in Impact 6.4-1, specific mitigation measures have been identified to minimize the risk of an accidental release of hazardous substances. The potential for releases of hazardous substances during site preparation is described in Impact 6.4-2. Mitigation Measures identified for these impacts would be sufficient to reduce potential hazards at the school sites, and no additional mitigation is required. (DEIR, p. 6.4-30.)

As discussed in Impact 6.4-3, construction and operation of the proposed project would involve the routine use and storage of hazardous materials within the SMCS Project. Construction would temporarily and intermittently involve the use of products that may have hazardous properties, but construction site controls would limit the potential for hazardous substances to affect school properties. The use of hazardous materials would not be a new use at the site when the proposed facilities become occupied. However, because there would be a net increase in patients diagnosed and treated at the site, as compared to existing conditions, there would be an increase in the amount of materials used on-site, which would also increase the amount of hazardous waste. The types of hazardous materials would not change, however. As stated in Impact 6.4-3, hazardous materials (including wastes) would be managed at the new facilities in accordance with established protocols. (DEIR, p. 6.4-30.)

An 11,000-gallon liquid oxygen tank and 3,000-gallon reserve tank would be located on the west side of the proposed SMF Building (see Figure 2-11) about 150 feet east of the Montessori School and an outdoor play area. The tanks would be surrounded by 22-foot-high concrete wall; a portion of the wall would be metal louvers. For the reasons outlined in Impact 6.4-3, there is no evidence the tanks would pose a significant health risk to nearby schools or the adjacent playground due to the release of a hazardous substance. (DEIR, p. 6.4-30.)

The relocated Energy Center would include two new USTs. Fuel would be stored underground, and there would be leak-detection devices. This would not pose a health risk to nearby schools. (DEIR, p. 6.4-30.)

Some of the hospital operations would involve processes that could emit toxic air contaminants (TACs), as discussed in Impact 6.2-6 in Section 6.2, Air Quality. TAC emissions already occur from existing facilities, but the types of emissions are not considered acutely hazardous by the SCAQMD, and the concentrations of emissions are not at levels that would pose a significant health risk. Development of the SMF Building, WCC Building, new medical offices, and operation of the relocated and expanded Energy Center could result in an increase in TAC emissions over existing conditions, but not to levels where that would pose a health risk to nearby schools (see Impact 6.2-6 in Section 6.2, Air Quality). (DEIR, p. 6.4-30.)

In summary, while hazardous materials, substances, or waste would be handled within the SMCS Project within ¼ mile of four schools, including an outdoor play area, impacts would considered ***less than significant*** for the reasons discussed above. (DEIR, p. 6.4-30)

Theatre

Products used in theaters typically include common items such as paints, glues, and cleaning compounds for set construction. Common household chemicals such as cleaning agents (soap products and degreasers) may be used and stored within the site for maintenance. Neither the types nor quantities of these materials would be substantial. Routine use of these products would not lead to a significant hazard to people or the environment within ¼ mile of a school. Therefore this is a ***less-than-significant impact***. (DEIR, pp. 6.4-30.)

Mitigation Measures: *None required.* (DEIR, p. 6.4-31.)

Significance After Mitigation: The impact is less than significant without mitigation. (DEIR, p. 6.4-30.)

Impact 6.4-5: The SMCS Project proposed helistop would not result in substantial safety risks due to helicopter operations. However, the design of the proposed helistop serving the Women's and Children's Center could be inconsistent with Section 12.92.070 of the Sacramento City Code pertaining to helistop design. (Less than Significant). ***(DEIR, p. 6.4-31.)***

Finding: Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.) Nevertheless, a voluntary measure has been incorporated into the project to ensure that the potential effects of the project remain less than significant.

Explanation:
The SMCS Project proposes to construct a helistop on top of the southern section of the WCC Building. The helistop, which would be a new use at the project site, would be used for scheduled transfers of infants, children, and adults. SMCS would not operate life-flight emergency services from the helistop. Helicopters would not be housed, parked, or refueled at this site, but would only drop off patients and return to a remote base. It is anticipated there would be approximately 150-200 take-offs/landings per year, or an average of about 15 to 20 landings/take-offs per month. (DEIR, p. 6.4-31.)

A permit for helistop operations is required from the Caltrans Division of Aeronautics, along with land use approvals from the City of Sacramento and the Sacramento Airport Land Use Commission. Caltrans Division of Aeronautics would also be responsible for ensuring FAA requirements are satisfied before approving SMCS's permit application for the helistop. (DEIR, p. 6.4-31.)

The SMCS Project would not, in and of itself, generate new helicopter flights in the metropolitan Sacramento area. The environmental effect of the SMCS Project would be to place helicopter operations (take-offs and landings) in closer proximity to existing developed land uses than if the proposed helistop were not constructed. Helistop operation would also result in approach and departure paths in an area that does not currently have such operations. (DEIR, p. 6.4-31.)

The use of the proposed helistop on the roof of the WCC Building by medical transport helicopters is not considered to present a substantial safety risk to the project site or adjacent

land uses for several reasons, which are discussed below. The discussion presents some general information about helicopter safety, followed by information specific to the proposed SMCS helistop. (DEIR, p. 6.4-31.)

Helicopter Safety and Risk

Some amount of risk is associated with helicopter operations. The degree of risk is measured by the frequency of occurrence (how often), potential consequences (severity of the accident), and spatial distribution (where the accident occurs). In 2001, the accident rate for helicopter emergency medical service (EMS) helicopter operations was estimated to be 5.97 accidents per 100,000 flight hours. This is less than the accident rate helicopter aviation in general (7.64 accidents per 100,000 flight hours). The EMS helicopter rates have remained below the accident rates for both general aviation and all helicopter operations. Fatalities (crew and passengers) have experienced a similar decline. From a high of nearly 10 fatal accidents per 100,000 flight hours in 1980, the rate has decreased to approximately 2 fatal accidents per 100,000 flight hours in 2001. (DEIR, p. 6.4-32.)

In general, aviation operations are more prone to accidents or incidents during take-offs or landings than during the cruise portion of the flight. However, this is not the case with helicopter emergency medical service operations.

Accidents do happen at rooftop hospital heliports/helipads, but they are rare. Where accidents occurred at rooftop facilities, the NTSB identified pilot error as the probable cause in most cases. During the period 1998 through March 2005, there have been few fatal accidents involving hospital rooftop helipads. (DEIR, p. 6.4-32.) The statistical data summarized above show that while some risk exists with EMS helicopter operations at a hospital rooftop helipad (or helistop), the risk is not substantial. (DEIR, p. 6.4-32.)

Proposed SMCS Helistop Operations

Collisions with objects is one of a number of causes of helicopter accidents. An important Federal Aviation Regulation (FAR) for protecting aircraft during the landing and takeoff phases of flights is FAR Part 77 (14 CFR 77), which establishes height standards for objects near a landing area. The helistop's approach and departure flight paths are not adversely affected by obstructions. Therefore, the standards of FAR Part 77 are satisfied at the SMCS site. (DEIR, p. 6.4-32.)

The primary flight path would be arrivals from the northeast, along the Capital City Freeway. Departures would be along Capital City Freeway to the southwest, towards the U.S. Highway 50/State Route 99 interchange. This would occur when winds are from the south/southwest, which is the prevailing wind direction in Sacramento. This is also the optimum condition in terms of aircraft performance and safety. When winds are from the north, the flight paths would be reversed (arrivals from the southwest and departures to the northeast). This would be the secondary route. Federal aviation regulations do allow helicopter pilots to divert from established routes when necessary for safety of flight. The primary and secondary arrival/departure paths would not be over existing residential neighborhoods, schools, or churches. (DEIR, p. 6.4-33.)

Feasibility planning for the proposed helistop indicates there are no existing buildings or structures within the approach zones that would obstruct airspace, and the height of the proposed WCC would not create an obstruction to helicopters using the helistop. In addition, the 8:1 approach/departure slope with the 4,000-foot approach path required by State and local regulations can be achieved with no obstruction hazards. Therefore, there would be no substantial contribution to increased risk of accident because of obstructions. (DEIR, p. 6.4-33.)

From a siting and regulatory perspective, the FAA does not prohibit heliports (or helistops) adjacent to freeways or highways, so there would be no conflict with that agency's requirements. The City Code (Section 12.92.030) allows helistops to be erected on buildings (with a special use permit), which is consistent with the City's General Plan policy for siting. (DEIR, p. 6.4-33.)

Helicopter approaches and departures to the helistop would be visible to passing motorists on the freeway. However, the proposed helistop on the WCC is approximately 167 feet above the ground, which is higher than the elevated freeway and adjacent buildings, and it would be the tallest building at the SMCS Project. Because of the height and distance from the freeway, helicopter take-offs and landings would not be a distractive hazard to motorists. (DEIR, p. 6.4-33.)

Helicopter landing tests at other local hospitals have demonstrated that while people may notice helicopter operations, there was no observed effect on pedestrian or vehicle traffic patterns or increased rate of vehicle accidents while helicopters were operating.

Simulated approach and takeoff operations to the proposed SMCS helistop site were conducted on three separate occasions (two daytime and one night) without any noticeable effect on freeway traffic. As noted in the Environmental Setting, helicopter operations are common throughout the downtown area and people have become accustomed to their presence in an urban environment. (DEIR, p. 6.4-33.)

Consistency with Design Criteria

The FAA has established design standards that are specific to the actual landing area at hospital helistops and helipads to protect public safety and property. These standards are current as of September 2004. (DEIR, p. 6.4-33 - 6.4-34.)

The City of Sacramento's Helicopter Ordinance is in the process of being updated to conform to federal and Caltrans requirements. When the City's ordinance is updated, SMCS's helistop would be consistent with federal, State, and local (City of Sacramento) design criteria. In the event the ordinance is not modified prior to City action on the SMCS Project, the SMCS Project would be considered inconsistent. However, this is not considered a significant impact because specific design criteria established by the FAA would continue to apply. The amendment to Section 12.92.070 of the City Code pertaining to the size of the "touchdown area" would not result in any significant environmental effects. (DEIR, p. 6.4-35.)

Mitigation Measure: Although not required, implementation of Mitigation Measure 6.4-3, in the event that the City has not amended Section 12.92.070 of the City Code, will ensure

consistency with applicable City regulations and that the potential impacts remain less than significant. (DEIR, p. 6.4-35.)

Significance After Mitigation: The impact is less than significant without mitigation. (DEIR, p. 6.4-35.)

Impact 6.4-6: Implementation of the SMCS Project could interfere with emergency response and/or emergency evacuation plans. (Less than Significant). (DEIR, p. 6.4-35.)

Finding: ***Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)***

Explanation:
During construction of individual projects, it may be necessary to restrict travel on certain roadways within the SMCS Project area to facilitate construction activities such as demolition, material hauling, construction, staging, and modifications to existing infrastructure. Such restrictions could include lane closures, lane narrowing, and detours, which would be temporary but could continue for extended periods of time. In the event of an emergency, emergency response access or response times could be adversely affected. These impacts would occur during the construction period and would not be permanent.

The City of Sacramento requires the project applicant prepare and implement a Construction Traffic Management Plan in accordance with Sections 12.20.020 and 12.20.030 of the Sacramento City Code. The plan must be approved by the City Public Works or Utilities Director prior to any work that would obstruct vehicular or pedestrian traffic on any City Street. (DEIR, p. 6.4-36.)

In conjunction with project development, L Street would be narrowed to accommodate construction of WCC; however, it would not prevent, impede, or impair implementation of an evacuation plan, because it is not a designated evacuation route. (DEIR, p. 6.4-36.)

The SMCS Project would also create some elevated pedestrian walkways between SMCS facilities. This would decrease pedestrian traffic on local roadways, which could allow for faster and safer emergency vehicle use or evacuation through the project site. This is a ***less-than-significant impact***, and no additional mitigation is required. (DEIR, p. 6.4-36.)

Theatre

During construction of the Children's Theatre, it may be necessary to restrict travel on nearby roadways to facilitate construction activities. Such restrictions could include lane closures, lane narrowing, and detours, which may be temporary or continue for extended periods of time. Lane restrictions, closures, and/or detours could cause an increase in traffic volumes on adjacent roadways. Due to the relatively small size of the Theatre project, traffic restrictions would generally be minor and temporary. As described for the SMCS Project, a Construction Traffic Management Plan must be prepared and approved by the City prior to work that would

obstruct vehicle or pedestrian traffic. No permanent roadway modifications are contemplated for the Theatre. (DEIR, p. 6.4-36.)

Mitigation Measures: *None required.* (DEIR, p. 6.4-36.)

Significance After Mitigation: The impact is less than significant without mitigation. (DEIR, p. 6.4-36.)

Impact 6.4-7: The SMCS Project, in combination with other development in the City of Sacramento, would result in the demolition of existing buildings. This demolition and other site preparation activities could result in a release of hazardous materials to the environment thus exposing the public to potential health risks. (Less than Significant). **(DEIR, p. 6.4-37.)**

Finding: ***This impact can be reduced to less than significant levels through implementation of Mitigation Measure 6.4-5. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the potentially significant short-term environmental effect as identified in the DEIR.***

Explanation:
For any project in the City of Sacramento that would develop or redevelop an existing site where hazardous building materials such as asbestos or lead-based paint is present, the potential exists for release of hazardous materials during demolition/renovation of those sites. Previously unidentified soil or groundwater contamination or buried items containing hazardous substances (e.g., USTs) could also be encountered during excavation and other site preparation activities For individuals not involved in demolition/construction activities, the greatest potential source of exposure to contaminants would be airborne emissions, primarily through construction-generated dust from demolition or grading. Other potential pathways, such as direct contact with contaminated materials would not pose as great a risk to the public because such exposure scenarios would typically be confined to the demolition/construction zones. This assumption is based on implementation of site-specific risk management controls and compliance with applicable laws and regulations pertaining to site cleanup and hazardous materials management at locations in the areas surrounding the project site. Moreover, an individual who is directly outside the demolition/construction zone of one source of hazardous materials would be unlikely to be exposed to maximum levels from another source. Such exposure would typically be site-specific and would involve accidental or inadvertent exposure to hazardous building materials. Associated health and safety risks would generally be limited to those individuals working with the hazardous building materials or to persons in the project site Furthermore, such impacts would only be temporary and intermittent. The cumulative effect would be a ***potentially significant short-term impact***. (DEIR, p. 6.4-37)

Mitigation Measures:

Compliance with Mitigation Measures 6.4-5, 6.4-1 and 6.4-2 would reduce all cumulative impacts to a *less-than-significant level*. (DEIR, pp. 6.4-37; 6.4-31.)

Significance After Mitigation: The impact is less than significant after mitigation. (DEIR, p. 6.4-37.)

Impact 6.4-8: The SMCS Project, in combination with other development in the City of Sacramento, could increase the risk of exposure of people to hazards due to increased volume

and type of hazardous materials used, transported, stored, and disposed in the City. (Less than Significant). ***(DEIR, p. 6.4-38.)***

Finding: ***Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)***

Explanation:
The construction and operation of current and future projects within the City of Sacramento, including projects within ¼ mile of a school, would continue to involve the use of hazardous materials. Projects that use, store, or dispose of hazardous materials would be required to comply with federal, State and local regulations to ensure the safe handling of these materials. Due to strict regulation, the risk of release or exposure to hazardous materials within Sacramento would be minimized. Associated health and safety risks would generally be limited to those individuals using the materials or to persons in the immediate vicinity of the materials. Although the risk of accident or inadvertent releases cannot be completely avoided, hazardous materials incidents would typically be site-specific, generally one-time occurrences that would not combine with similar effects elsewhere. Implementation of applicable hazardous materials management laws and regulations adopted at the federal, State, and local level, which are monitored by the City of Sacramento and SCEMD, would ensure cumulative impacts related to hazardous materials use remain **less than significant**. (DEIR, p. 6.4-38.)

Hazardous materials use at the SMCS Project would increase; however, some of the increase in hazardous materials use would be attributable to the relocation of services from the existing Sutter Memorial Hospital in East Sacramento rather than a new use in Sacramento. Because the proposed project's net contribution to this cumulative impact would be a small increment, the project's contribution would be ***less than cumulatively considerable*** and, thus, less than significant. (DEIR, p. 6.4-38.)

Mitigation Measures: *None required.* (DEIR, p. 6.4-38.)

Significance After Mitigation: The impact is less than cumulatively considerable, and thus, less than significant without mitigation. (DEIR, p. 6.4-38.)

Impact 6.4-9: Implementation of the SMCS Project, in combination with existing and anticipated development in the Sacramento metropolitan area, would increase the number of permitted helistops, heliports, and helipads. (Less than Significant). (DEIR, p. 6.4-39.)

Finding: ***Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)***

Explanation:
There are several permitted helistops, heliports, and helipads in the greater Sacramento area. The Caltrans Division of Aeronautics is also reviewing applications for proposed helipads at two other local hospitals. The proposed SMCS helistop would increase the number of helistops in the region. Helicopters transporting patients would occur regardless of whether the SMCS Project is implemented. The SMCS Project would provide an additional location for patient transfers within the region, but it would not increase the number of helicopter trips. (DERI, p 6.4-39.)

Each facility must be permitted by Caltrans and secure all required land use approvals. Approach and departure paths are established for each facility, and the use of airspace over Sacramento is governed by federal and state regulations, which applies to helicopter flights. The frequency, location, and severity of helipad accidents (which are extremely rare) at any one location would be site-specific and would be limited to the immediate vicinity. As such, take-off and landing accidents would not combine to create a cumulative effect for the SMCS Project. Therefore, the impact is not cumulatively considerable and would result in a ***less-than-significant cumulative impact***. (DERI, p. 6.4-39.)

Mitigation Measures: *None required.* (DEIR, p. 6.4-39.)

Significance After Mitigation: The impact is less than significant without mitigation. (DEIR, p. 6.4-39.)

Impact 6.4-10: The SMCS Project, in combination with development in the City of Sacramento, could interfere with emergency response plans and/or emergency evacuation plans. (Less than Significant). ***(DEIR, p. 6.4-40.)***

Finding: ***No mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)***

Explanation:
Construction-related activities and developments within the City of Sacramento that alter, close, or in other ways affect traffic on area roadways could interfere with emergency response access or response times or affect evacuation routes. Construction-related activities of the SMCS Project would contribute to this effect. If project restrictions coincide with other closures from adjacent projects, emergency response access or response times could be adversely affected. The City requires all project applicants to prepare and implement a Construction Traffic Management Plan for projects that would obstruct vehicle traffic. This would allow the City to manage affected roadways so that effects would not be cumulatively considerable. The impact is considered a ***less-than-significant cumulative impact***. No additional mitigation is required. (DEIR, p. 6.4-40.)

Theatre
As discussed for the SMCS Project, cumulative construction traffic impacts would not be significant. No roadway modifications are proposed for the Theatre project that could combine with similar effects elsewhere. There would be ***no impact***. (DEIR, p. 6.4-40.)

Mitigation Measures: *None required.* (DEIR, p. 6.4-40.)

Significance After Mitigation: The impact is less than significant without mitigation. (DEIR, p. 6.4-40.)

E. *HYDROLOGY AND WATER QUALITY*

Impact 6.5-1: Implementation of the SMCS Project could result in an increase in the rate and amount of stormwater runoff from the project area, which could cause or exacerbate flood conditions on- or off-site. (Less than Significant). ***(DEIR, p. 6.5-9.)***

Finding: ***Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)***

Explanation:
The SMCS Project is proposed for development on land that currently contains urban development consisting primarily of impervious surfaces. Development of the SMCS Project is expected to increase the amount of impervious surfaces by approximately 16,000 square feet, or approximately 0.37 acre. The City has recently adopted the Combined System Development Fee Ordinance that requires a development fee for projects within the CSS Service boundary. (DEIR, p. 6.5-9.)

The project area is drained by the CSS, which is considered an impacted system due to its lack of available capacity during storm events. During dry weather conditions, the CSS has enough available capacity to handle the total flow, which is primarily composed of sewage. During storm events, the combination of sewage and stormwater runoff has the potential to create localized street flooding. Absent system improvements, however, flooding and CSOs would continue. (DEIR, p. 6.5-9.)

Compliance with the City's Combined System Development Fee ordinance would reduce the project impact by providing (1) additional capacity in the City's system to reduce the potential for flooding and CSOs system-wide, or (2) requiring storage of project flows to ensure that the SMCS Project would not contribute to flooding and CSOs. This would reduce this impact to a ***less-than-significant level***. (DEIR, p. 6.5-10.)

Theatre
The total area of the five parcels that comprise the proposed theatre location is approximately 38,500 square feet. The site currently contains impervious surfaces associated with the Trinity Apartments, EAP Building, an existing surface parking lot, and a vacant lot containing pervious surface, which account for approximately 30,000 square feet of surface coverage. There is one undeveloped lot about 1,700 square feet in size. (DEIR, p. 6.5-10.)

Assuming land coverage shown in Figure 2-1 of the Draft EIR for the proposed Theatre site, it is likely there could be a small increase in impervious surfaces generating stormwater runoff – on the order of approximately 3,000 square feet, but no more than 8,500 square feet. The net increase in impervious surface would not be any greater than 0.25 acre (10,980 square feet). Therefore, increases in stormwater flows from the Theatre site would not be substantial enough to cause or exacerbate capacity exceedences in the CSS that could cause localized flooding. This impact is considered ***less than significant***. (DEIR, p. 6.5-10.)

Mitigation Measures: *None required.* (DEIR, p. 6.5-10)

Significance After Mitigation: The impact is less than significant without mitigation. (DEIR, p.

6.5-10.)

Impact 6.5-2: Stormwater runoff from the SMCS Project would contain urban pollutants that could be discharged to the Sacramento River, which could affect surface water quality. (Less than Significant). ***(DEIR, p. 6.5-10.)***

Finding: ***Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)***

Explanation:
The SMCS Project would be developed on land that currently contains urban development consisting primarily of impervious surfaces (parking lots, building rooftops, hardscaping, and roadways). Stormwater runoff from impervious surfaces on the project site is currently conveyed to the CSS. Stormwater runoff within project area is currently collected by the CSS and transported to the SRWTP or CWTP for treatment before discharging into the Sacramento River. The CSS and WTPs operate under current NPDES permits regulated by the CVRWQCB. (DEIR, pp. 6.5-10 – 6.5-11.)

Development of the SMCS Project would generate only a small net increase in stormwater runoff conveyed to the CSS (see Impact 6.8-7 in Section 6.8, Utility Systems of Draft EIR). The types and concentrations of pollutants are not expected to vary significantly from existing conditions. At some locations, there could actually be a decrease in certain pollutants such as oil and grease and metals carried in stormwater runoff. (DEIR, p. 6.5-11.)

Modifications, if any, to the storm drain inlet locations and sizing to accommodate the SMCS Project would include stormwater quality BMPs, consistent with the City's NPDES stormwater permit requirements and features in the existing system. This would ensure urban pollutants generated by the SMCS Project would continue to be managed in accordance with State and local regulations. (DEIR, p. 6.5-11.)

Because the SMCS Project would not result in a substantial net increase in urban pollutants in stormwater runoff and would include stormwater quality BMPs, discharges from the SMCS Project would not violate any water quality standards, exceed wastewater discharge requirements, or otherwise degrade water quality, and impacts would be ***less than significant***. (DEIR, p. 6.5-11.)

Theatre
The Theatre site lies within the SMCS Project area and currently contains impervious surfaces associated with the Trinity Apartments, EAP Building, and two existing surface parking lots, along with a vacant lot containing pervious surface. As described in Impact 6.5-1, there would not be a substantial net increase in runoff. Because parking areas, which typically contain grease and metals, would be converted to building surfaces, there could be a decrease in these pollutants from the site. Therefore, Sacramento River water quality would not be adversely affected. Impacts would be ***less than significant***. (DEIR, p. 6.5-11.)

Mitigation Measures: ***None required.*** **(DEIR, p. 6.5-11.)**

Significance After Mitigation: The impact is less than significant without mitigation. (DEIR,

p. 6.5-11.)

Impact 6.5-3: Groundwater from construction and foundation dewatering would be discharged to the City's CSS, which could result in CSS capacity and water quality impacts. (Less than Significant). ***(DEIR, p. 6.5-12.)***

Finding: ***Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)***

Explanation:
Because some excavation activities of the SMCS Project could reach levels at or below the depth of groundwater, dewatering activities are anticipated. During construction, it may be necessary to remove groundwater from these excavations because of the shallow water table. During construction dewatering, shallow groundwater may contain sediment that, if discharged to the treatment plant, could affect plant operating conditions. (DEIR, p. 6.5-12.)

Permanent foundation dewatering systems are in place for some of the existing structures in the project site. During the life of the project, shallow groundwater could infiltrate subsurface walls and foundations, potentially causing structural damage unless groundwater is removed. Preliminary engineering estimates indicate the WCC would add approximately 33,000 square feet of foundation requiring dewatering, resulting in approximately 100 to 278 gallons per minute (gpm) to be discharged to the CSS. An existing pump that serves the Energy Center would be eliminated, and a new pump would be added to serve the south half of the SGH. A foundation dewatering system for the proposed SMF Building and new Energy Center is not anticipated. (DEIR, p. 6.5-12.)

The City of Sacramento requires that any discharges of groundwater from construction foundation or basement dewatering be permitted through the City Utilities Department. The applicant has submitted a written request to the City to expand the underground dewatering systems to accommodate the design of the proposed WCC, which take into account the site-specific concerns summarized above. All groundwater discharges to the sewer must also obtain a discharge permit from the SRCSD Industrial Waste Section. These requirements would be made part of the construction contract specifications and confirmed by City staff through the building permit process. The applicant has been coordinating with City Utilities staff to identify solutions to the hydrostatic pressure issues associated with existing and new construction. (DEIR, p. 6.5-13.)

As discussed in Impact 6.4-2 in Section 6.4, Hazards and Public Safety, there are no known groundwater contamination issues at the site, so it is not anticipated that contaminated groundwater would be encountered during dewatering. However, part of the permitting process includes an assessment of groundwater quality. Should contaminants be detected in groundwater proposed for discharge to the CSS that were not previously detected, the City would require the applicant to initiate actions to control contaminant levels during dewatering. (DEIR, p. 6.5-13.)

The purpose of these requirements is to ensure project dewatering discharges to the CSS do not temporarily or permanently reduce system capacity to levels at which overflows or outflows could occur and to protect influent and effluent water quality at the treatment plants. Such measures are necessary for the City to comply with adopted NPDES permits. Because there is an established regulatory mechanism in place that is enforced by the City and that would be

applicable to the proposed project, the SMCS Project would not violate any water quality standards or waste discharge requirements or cause exceedances of CSS capacity. (DEIR, p 6.5-13.)

Theatre

If dewatering is required for the Children's Theatre of California construction or long-term operation, that project would be required to comply with the City's dewatering policy, as discussed for the SMCS Project. (DEIR, pp. 6.5-13.)

Mitigation Measures: ***None required.* (DEIR, p. 6.5-13.)**

Significance After Mitigation: The impact is less than significant without mitigation. (DEIR, p. 6.5-13.)

Impact 6.5-4: Wastewater flows from the SMCS Project would contain chemicals, radioactive materials, and chemotherapeutic wastes that would be discharged to the Sacramento River via the CSS and SRWTP, which could affect water quality. (Less than Significant) ***(DEIR, p. 6.5-14.)***

Finding: ***Less than Significant. No mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)***

Explanation:
Implementation of the SMCS Project would result in a net increase of 0.15 mgd of wastewater to the CSS system (see Impact 6.8-6 in Section 6.8, Public Utilities in the Draft EIR). Because the types of patient care and routine hospital functions would not differ substantially from existing conditions (other than an increase in the number of patients and facility space), the chemical characteristics of wastewater discharged to the sewer would not be expected to differ substantially. Therefore, the SMCS Project would not adversely affect the NPDES discharge limitations for the SRWTP or the CWTP such that adverse effects on Sacramento River water quality would occur. (DEIR, p. 6.5-14; see also *Environment of Care Manual* "Hazardous Chemical Waste Management Program" (describing the procedures for the disposal of hazardous chemicals, radioactive waste, and chemotherapeutic waste within its facilities).)

The existing Energy Center uses water to generate chilled water and steam. Various products are used to treat the water to maintain proper water chemistry. These products include algicides, biocides, and anti-scaling chemicals. Wastewater containing low levels of these chemicals is discharged to the CSS. The capacity of the Energy Center would be increased to accommodate additional demand of the SMCS Project. This would result in an increase in the amount of water used in the system and a commensurate increase in the amount of chemicals used. This would not be a new discharge, and no change is anticipated in the types of chemicals, as compared to existing conditions, that would substantially affect the quality of water entering the sewer and treated at the treatment plants for which NPDES permits have been granted. The applicant's engineer has indicated that a permit for the increased wastewater discharge from the proposed new Energy Center would not be required, indicating that the types and levels of constituents in the wastewater would not be likely to affect the NDPES discharge limitations imposed by the CVRWQCB on either the SRCSD or CWTP plants. (DEIR, pp. 6.5-14 – 6.5-15.)

Theatre

The proposed theatre would not discharge any wastewater to the sewer other than domestic wastewater. There would be ***no impact.*** (DEIR, p. 6.5-15.)

Mitigation Measures: ***None required.*** **(DEIR, p. 6.5-15.)**

Significance After Mitigation: Less than significant without mitigation. (DEIR, p. 6.5-15.)

Impact 6.5-5: The project, in combination with cumulative development in the CSS service area, would generate stormwater runoff that could result in localized flooding. (Less than Significant) ***(DEIR, p. 6.5-15.)***

Finding:
Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation:
The City's CSS is considered an impacted system due to its lack of available capacity during storm events. During dry weather conditions, the CSS has enough available capacity to handle the total flow, which is primarily composed of sewage. During storm events, the combination of sewage and stormwater runoff has the potential to create localized street flooding. Additional runoff from development within the CSS service area, including the SMCS Project, could contribute to localized street flooding related to the exceedance of the system's capacity. (DEIR, p. 6.5-15.)

The Department of Utilities has completed several CSS Improvement and Rehabilitation Program projects, including construction of new regional storage projects, and numerous rehabilitation and replacement projects throughout the system. The City continues to undertake improvements according to the program, including additional storage facilities, and the improvement and expansion of existing facilities. Compliance with the City's Combined System Development Fee ordinance would reduce the project's potential cumulative impact by providing (1) additional capacity in the City's system to reduce the potential for flooding and CSOs system-wide, or (2) requiring storage of project flows to ensure that the SMCS Project would not contribute to flooding and CSOs. (DEIR, pp. 6.5-15-6.5-16.)

Mitigation Measures: ***None required.*** **(DEIR, p. 6.5-16.)**

Significance After Mitigation: The impact is a less than significant cumulative impact without mitigation. (DEIR, p. 6.5-16.)

Impact 6.5-6: Stormwater runoff from the project, in combination with cumulative development in the CSS service area, could discharge urban pollutants to the Sacramento River, which could affect water quality. (Less than Significant) ***(DEIR, p. 6.5-16.)***

Finding:
Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation:
Cumulative urban development in the CSS service area would result in the creation of increased impervious surfaces which could increase the types and amounts of pollutants in stormwater runoff. The primary sources of water pollution would include runoff from roadways, and parking lots, runoff from landscaping areas, industrial activities, non-stormwater connections to the drainage system, accidental spills and illegal dumping. Runoff from roadway and parking lots could contain high levels of oil, grease, and heavy metals. Runoff from landscaped areas could contain concentrations of nutrients from fertilizers as well as pesticides. (DEIR, p. 6.5-16.)

Urban runoff within of the City and County of Sacramento, City of Folsom, City of Citrus Heights, City of Elk Grove and the City of Galt are regulated under a joint NPDES permit (No CAS082597), which was required under Phase 1 of the federal program. Phase 1 applied to discharges from large (population 250,000 or above) and medium (population 100,000 to 250,000) municipalities and certain industrial activities. Regulations pertaining to smaller jurisdictions, such as other cities in the Sacramento metropolitan area (e.g., Roseville, Rocklin) that also discharge urban runoff to the Sacramento River, required such jurisdictions to obtain permits under a Phase 2 program, which became effective in early 2003. The Phase 2 State Municipal Stormwater Permit required these smaller cities to develop, implement, and enforce a stormwater management program meeting the federal requirements for BMPs and other urban runoff water quality controls. The combined regional effect of the Phase 1 and Phase 2 programs is to reduce the types and amounts of urban pollutants discharged to waterways that drain to the Sacramento River. As discussed in Impact 6.5-2, the SMCS Project's contribution to post-construction water quality impacts associated with urban development would be minimal due to the developed nature of the SMCS Project area. (DEIR, pp. 6.5-16-6.5-17.)

Mitigation Measures: ***None required.*** **(DEIR, p. 6.5-17.)**

Significance After Mitigation: The impact is less than cumulatively considerable, and thus, less than significant without mitigation. (DEIR, p. 6.5-17.)

Impact 6.5.7: The project, in combination with cumulative development in the CSS service area, could discharge groundwater from dewatering to the sewer. (Less than Significant). (DEIR, p 6.5-17.)

Finding:
Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation:
Excavations requiring dewatering and subsurface features of new buildings in the downtown/midtown Sacramento area served by the CSS system are expected to require some level of dewatering because of shallow groundwater conditions. It is possible that dewatering could occur simultaneously at more than one site. The volume of water removed and the rate and frequency it would be discharged to the sewer would be site-specific. If controls such as the City's permit process for dewatering were not in place, the combined effect of simultaneous and/or consecutive discharges could overwhelm the CSS system and/or adversely affect water quality in the system. It could also cause localized shifts in groundwater patterns that could cause areas of degraded groundwater quality to shift. (DEIR, p. 6.5-17.)

The dewatering protocol established by the City and enforced at the City level would apply to the proposed project and other development where dewatering is needed in the CSS service

area. City staff review of permit applications for dewatering would allow the City to determine the volumes and frequencies of discharges that would be allowed to the CSS from each project to ensure capacity is not exceeded and water quality violations do not occur. (DEIR, p. 6.5-17.)

Mitigation Measures: ***None required.* (DEIR, p. 6.5-17.)**

Significance After Mitigation: The impact is less than significant without mitigation. (DEIR, p. 6.5-17.)

Impact 6.5.8: The project, in combination with cumulative development in the CSS service area, would result in increased wastewater flows, which could affect Sacramento River water quality. (Less than Significant). (DEIR, p. 6.5-18.)

Finding:
Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation:
Cumulative development in the City and County of Sacramento, in combination with the SMCS Project, would result in an increase in the amount of water conveyed to the CSS/CWTP and ultimately the SRWTP for treatment prior to discharge to the Sacramento River. Wastewater conveyed to the plants is expected to increase in volume and would continue to include various constituents that could affect influent and effluent water quality. Such discharges would occur regardless of whether the project is implemented. (DEIR, p. 6.5-18.)

The CSS improvements would only accommodate infill or redevelopment activities within the downtown area, and its service area will not be expanded to accommodate new development. As such, the CSS contribution to treated wastewater effluent discharges to the Sacramento River, including the proposed project, is not expected to contribute additional volumes or types of constituents that could adversely affect water quality. Because wastewater characteristics would be similar to existing conditions and flows are limited by CSS capacity, the cumulative impact is considered less than significant. The SMCS Project would contribute only a small percent of total CSS discharges (0.15 mgd), which is not considered substantial. (DEIR, p. 6.5-18.)

Mitigation Measures: ***None required.* (DEIR, p. 6.5-18.)**

Significance After Mitigation: The impact is a less than significant cumulative impact without mitigation. (DEIR, p. 6.5-18.)

F. *NOISE*

Impact 6.6.1: Construction activities would intermittently generate noise levels above existing ambient levels in the project vicinity. (Significant and Unavoidable). (DEIR, p. 6.6-22.)

Finding:
Changes or alterations have been required in, or incorporated into, the Project that substantially lessen, but do not avoid, the Project's short-term significant noise impacts. No feasible mitigation is available to render the effects less than significant. The effects therefore remain short-term significant and unavoidable.

Explanation:
During construction of the proposed SMCS Project, noise levels would be produced by the operation of heavy-duty equipment and various other construction activities. This construction noise would affect surrounding uses, but would be temporary, lasting only until the project construction is completed. As discussed in the Environmental Setting, there are sensitive uses in the vicinity of the project area (primarily residences, schools, and existing hospital uses), some of which are just across the street from areas where development activity, including demolition activities, would occur. During construction, the nearby residences would be occupied and the nearby hospital would continue to accommodate patients. (DEIR, p. 6.6-23.)

The Sacramento Municipal Code, Title 8 – Health and Safety, Chapter 8.68 – Noise Control, states that "it is unlawful for any person to make or continue or cause to be made or continued any loud, unnecessary or unusual noise which disturbs the peace and quiet of any neighborhood or which causes discomfort or annoyance to any reasonable person of normal sensitiveness residing in the area". This chapter also sets "not-to-be-exceeded" exterior noise standards for residential property. (DEIR, p. 6.6-23.)

Even though Chapter 8.68 sets general noise limits, the chapter also exempts certain activities from the provisions of the rest of the chapter. One of these activities is erection (including excavation), demolition, alteration or repair of any building or structure, as long as the activity takes place between certain hours. These specified hours ensure that construction occurs only during daytime hours; thereby minimizing the chance that noise would be generated during the more "sensitive" hours when people may be trying to sleep. (DEIR, p. 6.6-23.)

Because construction would occur during hours when buildings surrounding the different project site(s) are occupied, construction noise could impact these uses. As shown in Table 6.6-7 of the Draft EIR, jack-hammers could produce peak levels of up to 98 dBA L_{eq} at 50 feet. Since noise from a point source usually attenuates at approximately 6 dBA per doubling of distance, this would result in noise levels of about 101 dBA L_{eq} at 100 feet, and 95 dBA L_{eq} at 200 feet when this activity was ongoing. (DEIR, p. 6.6-23.)

Even though the City of Sacramento Municipal Code exempts construction activities from the noise standards specified elsewhere in the Municipal Code, this would do nothing to reduce the levels of construction noise experienced by occupants of nearby buildings, including Sutter General Hospital, the Buhler Building, other medical offices, and residents during the day. Construction activities such as the use of jackhammers and tractors would produce high levels of noise. Consequently construction noise, at least during the initial phases of demolition and grading, would create a ***short-term significant impact*** to surrounding uses. (DEIR, p. 6.6-23.)

Theatre

Similar to the SMCS Project, the proposed Theatre would generate noise during construction. Senior housing exists across the street from the theatre site as well as other residential and office uses. Daytime construction noise would be a special issue at this senior housing, because residents are more likely to be at home during the day. Demolition and grading activities could generate particularly high levels of noise that could affect residents. (DEIR, p. 6.6-23.)

Mitigation Measures: **Implementation of Mitigation Measure 6.6-1 would reduce noise from construction activities. The short term noise impacts would nevertheless remain significant and unavoidable. (DEIR, p. 6.6-24.)**

Significance After Mitigation: **After mitigation, the impact is short-term significant and unavoidable. (DEIR, p. 6.6-24.)**

Impact 6.6-2: Construction activities could result in groundborne vibration. (Less than Significant). (DEIR, p. 6.6-24.)

Finding:
Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation:
In addition to noise, construction activity can also produce vibration. (DEIR, p. 6.6-24.) The closest buildings where people sleep would be over 50 feet away from all project site boundaries. As shown in Table 6.6-8 of the Draft EIR, this distance would ensure that VdB levels would not exceed the 80 VdB threshold at which sleep disturbance could occur. Consequently, even if impact equipment such as jackhammers were used during demolition or construction of the project, sleep would not be affected. Also, the Sacramento Municipal Code requires that construction activity take place only outside of recognized sleep hours, so sleep patterns of nearby residences would not likely be affected. (DEIR, p. 6.6-24.)

Construction-related vibration would not reach the 80 VdB threshold of significance and would not cause annoyance to occupants of these buildings. Also, no pile-driving would occur during construction, so no structural damage could occur to existing buildings. (DEIR, p. 6.6-25.)

Theatre
Construction of the Children's Theatre could create groundborne vibration, however residential and other sensitive receptors are not located within 50 feet of the site of the proposed Theatre. Consequently, construction activities could not exceed the 80 VdB threshold and disturb sleep. Also, as discussed above, construction would be limited to daytime hours when sleep would not normally be disturbed. Construction of the Theatre would not require pile-driving, and so the structural integrity of nearby buildings would not be compromised. (DEIR, p. 6.6-24-6.6-25.)

Mitigation Measures: ***None required.* (DEIR, p. 6.6-25.)**

Significance After Mitigation. The impact is less than significant without mitigation. (DEIR, p. 6.6-25.)

Impact 6.6-3: The SMCS Project could result in an increase in existing traffic noise levels at existing land uses in the project vicinity on the existing local roadway network. (Less than Significant). (DEIR, p. 6.6-25.)

Finding:
Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation:
The SMCS Project would increase ambient noise levels by increasing traffic on local roads. (DEIR, p. 6.6-25.) Table 6.6-9 of the Draft EIR shows both existing and Existing Plus Project noise levels for various roadways in the vicinity of the project area. As shown, some roadways nearby already generate traffic that creates noise levels over 60 dBA Ldn at receptors along these roads. In no case, however, would traffic noise levels currently below 60 dBA be increased to the extent that receptors along the roads would experience noise levels over 60 dBA Ldn as a result of the project. In general, traffic noise levels along roads in the vicinity of the project would not increase by more than 1.6 dBA, as shown in Table 6.6-9. This would not be a noticeable noise increase. (DEIR, p. 6.6-25 – 6.6-26.)

Theatre

The Theatre component would also generate traffic volumes, which would increase noise levels on local roadways adjacent to sensitive receptors. However, the Theatre would only generate traffic before and after performances, when theatre-goers are either going to or departing from a performance. This project-related traffic would occur intermittently, and due to the size of the proposed Theatre, the traffic is not anticipated to exceed noise levels over 60 dBA. Consequently, while the project could increase traffic noise at certain times, it would not generate an increase in traffic throughout the day that would result in a noticeable increase in noise. (DEIR, p. 6.6-25-6.6-26.)

Mitigation Measures: ***None required.*** **(DEIR, p. 6.6-26.)**

Significance After Mitigation: The impact is less than significant without mitigation. (DEIR, p 6.6-26.)

Impact 6.6-4: Helicopter activities could exceed the City's exterior noise threshold. (Less than Significant). (DEIR, p. 6.6-27.)

Finding:
Less than Significant. Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation.
The helistop would be used intermittently on an as-needed basis. It is expected that no more than 200 landings would occur during the year. Helicopters would approach and depart from the roof of the WCC using two basic flight paths. These paths generally follow the Capital City Freeway from the north to the south or the south to the north. The approach from the north is on a heading of approximately 180 degrees, at an altitude of 1,000 feet mean sea level (MSL), and descending at a rate of 500 feet per minute. The departure would continue on the heading of 180 degrees to the south. The approach from the south is on a heading of approximately 360 degrees, at an altitude of 1,000 feet MSL, and descending at a rate of 500 feet per minute. The departure would continue on the heading of 360 degrees to the north. (DEIR, p. 6.6-27.)

Because helicopter flight paths would follow the Capital City Freeway, noise contours developed to evaluate helicopter noise generally follow the freeway as well. The 60 dB CNEL helicopter noise contour extends approximately three blocks north/south from about K Street to the north to about O Street to the south. East/west, the contour extends for about one and a half blocks to the west of the freeway. (DEIR, p. 6.6-27.)

The proposed helicopter operations would generate noise in residential areas that would be perceptible to residents. While this helicopter noise would be apparent to residents for short periods of time, the City of Sacramento General Plan standards for interior and exterior noise levels are measured over a 24-hour period. This 24-hour noise metric differs from other metrics such as L_{eq}, that measure noise levels over another, usually much shorter period of time. In contrast to L_{eq}, 24-hour standards evaluate noise levels when averaged over a much longer period, where very high or low noise levels average out and give a more accurate picture of ambient noise for an area. The short duration of helicopter noise during arrivals and departures would not be long enough to affect 24-hour noise levels. The impact to individuals from exposure to short-term helicopter noise is analyzed in Impact 6.6-7 of the Draft EIR. As shown in Figures 6.6-3 and 6.6-4 of the Draft EIR, the INM predicted CNEL contours indicate that no residential use would be exposed to noise levels in excess of the City of Sacramento exterior noise level criterion of 60 dB CNEL. (DEIR, p. 6.6-27.)

Mitigation Measures: *None required.* (DEIR, p. 6.6-27.)

Significance After Mitigation: *The impact is less than significant without mitigation. (DEIR, p. 6.6-27.)*

Impact 6.6-5: Helicopter activities could exceed Caltrans exterior noise thresholds. (Less than Significant). (DEIR, p. 6.6-28.)

Finding:
Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation:
As noted above, the project includes a helistop. The proposed helicopter operations could exceed the FAA or Caltrans Division of Aeronautics exterior noise level criterion of 65 dB Ldn/CNEL in residential areas. These noise levels would only occur during take-offs and landings, and would be of short duration. Consequently, they would not significantly affect 24-hour noise level standards. As shown in Figures 6.6-3 and 6.6-4, the INM predicted CNEL contours indicate that no residential uses would be exposed to noise levels in excess of 60 dB CNEL. Therefore, no residential uses would be exposed to noise levels in excess of 65 dB CNEL. (DEIR, p. 6.6-28.)

Mitigation Measures: ***None required.* (DEIR, p. 6.6-28.)**

Significance After Mitigation: The impact is less than significant without mitigation.

Impact 6.6-6: Helicopter activities could exceed the city's interior noise thresholds. (Less than Significant). (DEIR, p. 6.6-28.)

Finding:
Less than Significant. Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation:
The proposed helicopter operations could exceed the City's interior noise level criterion of 45 dB L_{dn}/CNEL. A typical exterior to interior noise level reduction of 25 dB can be expected with windows in the closed position. Based on the noise measurement data collected for noise monitoring sites 6 and 7, the minimum exterior to interior noise level reduction was 25 dB with the windows closed. Since no residential uses would be exposed to exterior helicopter noise levels in excess of 60 dB Ldn/CNEL, the interior noise levels are expected to comply with the City's interior noise level criterion of 45 dB Ldn/CNEL. (DEIR, p. 6.6-28.)

Mitigation Measures: ***None required.* (DEIR, p. 6.6-29.)**

Significance After Mitigation: The impact is less than significant without mitigation. (DEIR, p. 6.6-28.)

Impact 6.6-7: Helicopter activities could contribute to a sleep disturbance in adjacent neighborhoods (Significant and Unavoidable). (DEIR, p. 6.6-29.)

Finding:
Changes or alterations have been required in, or incorporated into, the Project that substantially lessen, but do not avoid, the Project's potentially significant effects associated with nighttime operational noise. No mitigation is available to render the effects less than significant. The effects therefore remain significant and unavoidable.

Explanation:
The proposed helicopter operations could result in sleep disturbance at existing residential areas adjacent to and near the proposed WCC. To describe noise levels due to the proposed helicopter operations, a series of noise measurements were performed during pre-arranged helicopter operations. The noise level measurements were conducted on February 19, 2004. The noise level measurements were conducted at 11 noise measurement sites. The sites were selected to provide meaningful technical data to develop a noise level data base for noise prediction, to calibrate the noise modeling of the proposed helicopter operations, to represent noise levels at the nearest residences, and to determine the effects of shielding of helicopter noise by intervening buildings. The measurement sites are shown by Figure 6.6-1 of the Draft EIR. To represent worst case noise exposure, the noise level measurements were conducted for a Bell 206 Long Ranger helicopter. (DEIR, p. 6.6-29.)

As explained in the draft EIR, maximum noise levels generated by the helicopter could easily exceed the 70 dBA maximum allowed by the Municipal Code at some areas containing residential uses, including apartments near L Street and 28th Street. (DEIR, pp. 6.6-29 thru 30.)

Mitigation Measures: **Implementation of Mitigation Measure 6.6-2 could reduce helicopter noise levels by ensuring that helicopters use the flight paths following Capital City Freeway whenever possible. This would not necessarily reduce maximum noise levels as shown in Table 6.6-10 of the Draft EIR. (DEIR, p. 6.6-30.)**

Significance After Mitigation: Significant and unavoidable. (DEIR, p. 6.6-30.)

Impact 6.6-8: The SMCS Project could result in an increase in future traffic noise levels at existing land uses in the project vicinity on the existing local roadway network. (Less than Significant). (DEIR, p. 6.6-31.)

Finding:
Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation:
In addition to increasing traffic noise in the near term, the SMCS Project could also increase noise in future years. The future year analyzed in the EIR was 2025. As shown in the EIR, all east/west lettered streets would have traffic noise levels greater than 60 dBA Ldn at 50 feet. For roadway segments with traffic noise levels below 60 dBA Ldn in the future, the project would increase noise levels along only the 28th Street roadway segment between J and K Streets above 60 dBA Ldn. However, there are no sensitive receptors along this roadway segment. Also, as shown in Table 6.6-11, no roadway would experience traffic noise level increases of more than 1.1 dBA Ldn in 2025 as a result of the project, when compared to the Without Project Scenario. This 1.1 dBA Ldn increase would not be a perceptible increase. (DEIR, p. 6.6-31.)

The City may implement a traffic calming program where certain one-way streets in the vicinity of the project area would be converted to two-way streets. If implemented, traffic noise levels would increase by no more than 2.1 dBA Ldn at any roadway. This would not be a perceptible increase in noise. (DEIR, p. 6.6-31.)

Theatre
The Children's Theatre of California project would also generate traffic volumes that would increase noise levels on local roadways adjacent to sensitive receptors. However, the Theatre would only generate traffic before and after performances, when theatre-goers are either going to or departing from a performance. This project-related traffic would occur intermittently. Consequently, while the project could increase traffic noise at certain times, it would not increase traffic noise throughout the day. (DEIR, p. 6.6-31.)

Mitigation Measures: ***None required.* (DEIR, p. 6.6-33.)**

Significance After Mitigation: The impact is less than significant without mitigation. (DEIR, p. 6.6-31.)

Impact 6.6-9: Future traffic noise levels may exceed acceptable noise level criteria at the exterior of the Women's and Children's Center. (Less than Significant with Mitigation). (DEIR, p. 6.6-33.)

Finding:
This impact can be minimized through implementation of Mitigation Measure 6.6-3. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant environmental effect as identified in the DEIR.

Theatre - Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation:
The City of Sacramento General Plan does not include interior noise standards for hospital uses. The General Plan does, however, specify a maximum "normally acceptable" exterior noise standard of 60 db Ldn. For residential uses, the General Plan specifies a "normally acceptable" exterior noise standard of no more than 60 db Ldn, and a "normally acceptable" interior noise standard of no more than 45 db Ldn. (DEIR, p. 6.6-33.)

As shown in Tables 6.6-9, 6.6-11, and 6.6-12 of the Draft EIR, roadway noise levels at some streets adjacent to the WCC would produce traffic noise levels in excess of the 60 db Ldn standard at 35 feet. This indicates that exterior traffic noise levels at the hospital would exceed the City's maximum "normally acceptable" noise exposure for hospital uses. (DEIR, p. 6.6-33.)

Also, as shown in the tables, proposed residences and offices on N Street between 26th and 27th Streets could experience exterior noise levels in excess of the City's 60 db Ldn "normally acceptable" noise exposure for residences. This, however, is not an issue with the residences, as they are not proposed to have front or back yards. Exterior noise levels are designed to protect individuals from excessive or uncomfortable noise levels at outdoor areas where they may spend significant amounts of time recreating or relaxing. The absence of these types of outdoor areas at the proposed residential units means that the emphasis should be placed on interior noise level standards. Construction of newer buildings usually has the capacity to reduce exterior to interior noise levels by about 30 db. Even in future years, exterior noise levels at the residences would not reach much higher than 64 db. The exterior to interior noise reduction provided by construction would result in interior noise levels below the 45 db "normally acceptable" interior noise standard for residential uses. (DEIR, p. 6.6-33.)

Theatre
The City of Sacramento General Plan does include exterior noise exposure levels for auditoriums, which would include uses such as the proposed theatre. The General Plan does not contain interior noise standards for these uses. The "normally acceptable" exterior noise exposure level is 70 db. As shown in the traffic noise tables, the proposed theatre would not be exposed to noise levels approaching 70 db. (DEIR, p. 6.6-33-6.6-34.)

Mitigation Measures:
Implementation of Mitigation Measure 6.6-3 to the SMCS Project would reduce the impact from traffic noise to less than significant levels. (DEIR, p. 6.6-34.)

Significance After Mitigation: The impact is less than significant after mitigation. (DEIR, p. 6.6-33.)

Impact 6.6-10. The SMCS Project, along with other future development, would increase noise levels. (Less than Significant). (DEIR, p. 6.6-34.)

Finding:
Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation:
The cumulative impact of the SMCS Project would include the Project plus Other Future Development in the vicinity. It is not likely that new stationary sources of noise would develop in the area. Any stationary noise sources would be required by the City to mitigate any noise

impacts prior to receiving a permit. Consequently, the major noise impact of future cumulative development would be traffic noise. (DEIR, p. 6.6-34.)

As shown in Tables 6.6-13 and 6.6-14 in the Draft EIR, total cumulative development in 2025 would differ very little from the "Future-plus-Project" scenarios shown in Tables 6.6-11 and 6.6-12. As discussed in Impact 6.6-2, the SMCS Project would add, at the most, 1.1 dBA Ldn to roadway noise levels, which would not be a significant increase. The Theatre would only generate traffic before and after performances, when theatre-goers are either going to or departing from a performance. This intermittent project traffic would add to cumulative future noise levels, but would not do so throughout the day. The Theatre's addition to 24-hour noise values would be very small. Since total cumulative noise levels resulting from the SMCS Project and the Theatre would not differ significantly from Future-plus-Project noise levels, the contribution to cumulative roadway noise would not be a perceptible increase. (DEIR, pp. 6.6-35.)

Mitigation Measures: ***None required.*** **(DEIR, p. 6.6-35.)**

Significance After Mitigation: Less than significant without mitigation. (DEIR, p. 6.6-35.)

G. TRANSPORTATION AND CIRCULATION

Impact 6.7-1: Intersections – The SMCS Project and the Children's Theatre would increase traffic volumes at study intersections. (Less than Significant). (DEIR, p. 6.7-36.)

Finding:
Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation:
Although the SMCS Project would increase traffic volumes at study area intersections, the changes in intersection operating conditions with the addition of project-generated traffic would not exceed the standards of significance for impacts to intersections. (DEIR, p. 6.7-36.)

Theatre
The Children's Theatre of California would increase traffic volumes at study area intersections. Although quantitative analyses of Existing plus Theatre traffic have not been conducted at this time, the theatre is anticipated to generate only 11 vehicle trips during each of the a.m. and p.m. peak hours. (DEIR, p. 6.7-36.)

Mitigation Measures: **None required.** ***(DEIR, p. 6.7-36.)***

Significance After Mitigation: **The impact is less than significant without mitigation. (DEIR, p. 6.7-36.)**

Impact 6.7-2: Freeway System – The SMCS Project and Children's Theatre would increase traffic volumes on the freeway system. (Significant and Unavoidable) (DEIR, p. 6.7-40.)

Finding:
Changes or alterations have been required in, or incorporated into, the SMCS Project that substantially lessen, but do not avoid, the Project's significant effects associated with transportation and circulation with the freeway system. No mitigation is available to render the effects less than significant. The effects therefore remain significant and unavoidable

Explanation:
The SMCS Project would increase traffic volumes on the freeway system. Tables 6.7-16 through 6.7-18 summarize the volume of traffic anticipated and the volume/capacity ratio and LOS. The changes in freeway system operating conditions with the addition of project-generated traffic would add traffic to a freeway facility that is already operating at a LOS "F". Intersection queuing on freeway exit ramps is not anticipated to extend into critical areas. Because the SMCS Project would add traffic, the impact is considered ***significant.*** (DEIR, p 6.7-40.)

Theatre

The Children's Theatre would increase traffic volumes on the freeway system. Although quantitative analyses of Existing plus Theatre traffic have not been conducted because the environmental review was conducted on a programmatic level, the theatre is anticipated to generate approximately 11 vehicle trips during each of the a.m. and p.m. peak hours. The impact is considered ***significant***. Because the Children's Theatre would add traffic to a freeway facility that is already operating at a LOS "F," no mitigation measures are available to avoid traffic to the freeway system. Therefore, the impact is considered *significant and unavoidable*. (DEIR, p. 6.7-40.)

Mitigation Measures: **None available.** ***(DEIR, p. 6.7-40.).***

Significance After Mitigation: **No mitigation is available to render the effects less than significant. The effects therefore remain short-term significant and unavoidable. (DEIR, p. 6.7-40.)**

Impact 6.7-3: Bikeways – The SMCS Project and Children's Theatre would result in the addition of employees, residents, patrons, and visitors to the site, some of whom would travel by bicycle. (Less than Significant). (DEIR, p. 6.7-43.)

Finding:
Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation:
The SMCS Project would result in the addition of employees, residents, patrons, and visitors to the site, some of whom would travel by bicycle. The SMCS Project would not result in any substantial changes to the existing or future bikeway system. The project is not anticipated to hinder or eliminate an existing designated bikeway, or interfere with implementation of a proposed bikeway. On-street bikeways would be maintained on L Street between 27th and 29th Streets, and along Capitol Avenue between 26th and 29th Streets. The project is not anticipated to result in unsafe conditions for bicyclists, including unsafe bicycle/pedestrian or bicycle/motor vehicle conflicts. (DEIR, p. 6.7-43.)

Theatre

The Children's Theatre would result in the addition of employees, patrons, and visitors to the site, some of whom would travel by bicycle. The theatre would not result in any substantial changes to the existing or future bikeway system. The theatre is not anticipated to hinder or eliminate an existing designated bikeway, or interfere with implementation of a proposed bikeway. The theatre is not anticipated to result in unsafe conditions for bicyclists, including unsafe bicycle/pedestrian or bicycle/motor vehicle conflicts. (DEIR, p. 6.7-43.)

Mitigation Measures: **None required.** ***(DEIR, p. 6.7-43.)***

Significance After Mitigation: **Less than significant without mitigation. (DEIR, p. 6.7-43.)**

Impact 6.7-4: (Pedestrian Facilities) The SMCS Project and Children's Theatre would result in the addition of employees, residents, patrons, and visitors to the site. (Less than Significant) (DEIR, p. 6.7-43.)

Finding:

Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation:
The SMCS Project would result in the addition of employees, residents, patrons, and visitors to the site. The project is not anticipated to result in unsafe conditions for pedestrians, including unsafe bicycle/pedestrian or pedestrian / motor vehicle conflicts. Pedestrian sidewalks would be provided on both sides of L Street between 27th and 29th Streets and three new pedestrian bridges are proposed to connect the medical complex. A new 3-story spanning structure is proposed over L Street to connect the existing Sutter General Hospital and the proposed WCC. In addition, a pedestrian bridge is proposed over 29th Street connecting the WCC to the public parking lot (south lot). A third pedestrian bridge is proposed over 28th Street connecting the Buhler Building with the new SMF Building. (DEIR, p. 6.7-44.)

Theatre

The Children's Theatre would result in the addition of employees, residents, patrons, and visitors to the site. The theatre is not anticipated to result in unsafe conditions for pedestrians, including unsafe bicycle/pedestrian or pedestrian/motor vehicle conflicts. Sidewalks would be maintained along Capitol Avenue and 27th Street. (DEIR, p. 6.7-44.)

Mitigation Measures: **None required.** ***(DEIR, p. 6.7-44.)***

Significance After Mitigation: **Less than significant without mitigation. (DEIR, p. 6.7-44.)**

Impact 6.7-5: Transit Services – The SMCS Project and Children's Theatre would increase demand for transit services. (Less than Significant). (DEIR, p. 6.7-44.)

Finding:
Under CEQA, no mitigation measures are required for impacts that are less than significant (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation:
The SMCS Project would increase demand for transit services. The SMCS Project would result in the addition of employees, residents, patrons, and visitors to the site, some of whom would travel by transit. Although particular transit vehicles operate at or near capacity during the peak commuter periods, a review of existing transit operations and plans for future transit services indicate that there is ample capacity on the Regional Transit system to support the anticipated increase in trips. (DEIR, p. 6.7-44.)

Theatre
The Children's Theatre would increase demand for transit services. The theatre would result in the addition of employees, patrons, and visitors to the site, some of whom would travel by transit. Although particular transit vehicles operate at or near capacity during the peak commuter periods, a review of existing transit operations and plans for future transit services indicate that there is ample capacity on the Regional Transit system to support the anticipated increase in trips. (DEIR, pp. 6.7-44-6.7-45.)

Mitigation Measures: **None required.** ***(DEIR, p. 6.7-45.)***

Significance After Mitigation: **Less than significant without mitigation. (DEIR, p. 6.7-45.)**

Impact 6.7-6: Parking – The SMCS Project and Children's Theatre would increase demand for parking (Significant and Unavoidable). (DEIR, p. 6.7-45.)

Finding:
Changes or alterations have been required in, or incorporated into, the Project that substantially lessen, but do not avoid, the Project's potentially significant effects associated with parking. No feasible mitigation is available to render the effects less than significant. The effects therefore remain potentially significant and unavoidable.

Explanation:
The SMCS Project would increase the demand for and supply of parking. The project proposes to increase the off-street parking supply from 1,847 spaces to 2,792 spaces, an additional supply of 890 spaces. This calculation of additional parking spaces accounts for replacement of existing parking spaces to be displaced by the project, such as the Paragary's surface lot. As shown in Table 6.7-19 of the Draft EIR, the SMCS Project could result in an estimated parking demand of 1,427 spaces. Combined with Trinity Cathedral the demand would increase to 1,452 spaces and 1,576 spaces including the Children's Theatre. The combined effect of these supply and demand changes could be a parking shortfall of up to 537 spaces for the SMCS Project. (DEIR, p. 6.7-45.)

The project would provide 25 spaces for the Trinity Cathedral Project, resulting in a total demand of 1,452 spaces. A shortage of on-site parking could result in parking in inappropriate areas (including residential neighborhoods), and create unnecessary circulation of vehicles on City streets as parking is sought. A shortage of on-site parking would particularly affect patients

and other visitors, since they would not be as aware of parking alternatives, and since many would arrive in the peak midday parking demand period. Taken together, the SMCS and Trinity Cathedral Projects could result in a parking shortfall of 562 spaces. (DEIR, p. 6.7-45.)

In order to reduce the potential for parking demand in excess of available supply, the SMCS Project includes a Parking Management Program to reduce parking demand, monitor parking demand on an on-going basis, and provide additional parking supply (including remote parking) if necessary. The Parking Management Program is described in Chapter 2, Project Description of the EIR. (DEIR, p. 6.7-45; see DEIR, p. 2-43 – 2-51.)

Because a hospital project is a very specialized use, and since many characteristics of medical care have changed since the zoning requirements were established, detailed parking analyses were conducted to estimate the parking demand of the SMCS Project. These studies include localized parking surveys (e.g., Sutter Memorial Hospital) as well as a review of data compiled by the Institute of Transportation Engineers (Parking Generation, Third Edition). The resulting estimate of demand is considered conservative, based on typical free-standing hospitals served primarily by automobiles. In the case of the proposed SMCS Project, the following factors could potentially reduce the project parking demand:

Medical office building characteristics – The proposed SMF medical office building space would include specialty care services, cardiac rehabilitation, and imaging rather than typical primary care offices located in many medical office buildings. The number of employees, number of patients and duration of visits varies between these uses because the type of medical activity is different than what has typically been assumed. However, no parking demand reduction has been taken because little quantifiable information is available to document the parking demand reduction as a result of the specific uses planned for the SMF Building.

Consolidation and internalization – One purpose of the SMCS Project is to consolidate Sutter General and Sutter Memorial Hospitals onto one medical complex to achieve better and more efficient services at less cost. Anticipated efficiency gains are related to consolidation and reduction in staff levels, and reductions in lost time by doctors and staff traveling between facilities. There would also be reduction in patient travel between facilities. Overall operational improvements could result in a staff reduction of five to ten percent, resulting in midday parking demand reductions of approximately 100 to 200 spaces. However, no parking demand reduction has been taken for consolidation and internalization.

Existing parking vacancies – Based on current surveys, the existing SMCS parking facilities had 420 vacant spaces on a typical weekday. The previously entitled Sutter General Hospital expansion of 71,300 sf results in a demand of 149 spaces, which can be accommodated within the existing facilities. However, no credit has been taken for the remaining 271 vacant spaces.

(DEIR, pp. 6.7-46 – 6.7-47.)

Taking into account the quantifiable factors discussed above, the SMCS Project parking shortfall could be as low as 66 spaces, and the combined SMCS and Trinity projects shortfall could be as low as 91 spaces at buildout. (DEIR, p. 6.7-47.)

It is difficult to determine the precise number of spaces that could be reduced as a result of the factors listed above. It is reasonable to expect that the SMCS TSM and Parking Management Program, described in Chapter 2, Project Description, would ensure parking supply is available to meet the parking demands of the project, primarily because of the stated commitment to

provide adequate parking to meet demand, even in remote parking lots if necessary. The adequacy of parking supply would be the subject of a specific monitoring and reporting effort. Nonetheless, there is the potential that if monitoring determines that parking demand reduction measures have not adequately reduced parking demand, there could be temporary parking shortfalls as new parking spaces are being made available. The Community Parking Structure is the first project component to be constructed which would ensure adequate parking is available as the new uses are developed. However, because there is the potential that there could be periods of time where parking demand may exceed supply as the project is being constructed this is considered a ***potentially significant impact.*** (DEIR, p. 6.7-47.)

Theatre

The Theatre project would also increase the demand for parking. Midday theatre parking demand is based upon an adult matinee event planned for the 200-seat theatre. Matinee performances would occur from 1:00 to 3:00 p.m., overlapping the peak midday parking period. Assuming 80 percent theatre occupancy and an effective 2.5 persons per automobile (including consideration of alternative modes), it is anticipated the theatre would generate a patron parking demand of 64 spaces. In addition, 60 spaces are to be provided for theatre staff. Therefore, during the time of performances the total theatre midday parking demand of 124 spaces is in addition to the 1,427-space demand of the SMCS Project and 25 spaces provided for the Trinity Cathedral Project resulting in a demand that exceeds the proposed supply. The SMCS Parking Management Program, described above, is designed to provide sufficient parking through demand management, on-going monitoring, and increases in parking supply as necessary.

Taken together, the SMCS, Trinity Cathedral, and Children's Theatre projects could result in a parking shortfall of up to 686 spaces. Taking into account the quantifiable factors discussed above, the combined SMCS, Trinity, and Children's Theatre projects parking shortfall could be as low as 215 spaces. Therefore, this is considered a ***potentially significant impact***. (DEIR, pp. 6.7-47-6.7-48.)

Mitigation Measures: ***Implementation of Mitigation Measure 6.7-1 would ensure SMCS provide parking if a shortfall is identified and addressed with additional measures before the shortage occurs. However, this would still be considered a*** **potentially significant and unavoidable impact.** ***(DEIR, p. 6.7-48.)***

Significance After Mitigation: After mitigation, the impact is potentially significant and unavoidable. (DEIR, p. 6.7-45.)

Impact 6.7-7: Parking -- The Children's Theatre would increase demand for oversized vehicle parking. (Less than Significant after Mitigation). (DEIR, p. 6.7-48.)

Finding: ***This impact would be reduced through implementation of Mitigation Measure 6.7-2. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant environmental effect as identified in the DEIR.***

Explanation:
Daytime events oriented to children would result in the need for parking for school buses and vans. There is no current provision in the SMCS Project or Children's Theatre plans at this time to accommodate oversized vehicles. (DEIR, p. 6.7-48.)

Mitigation Measures:

Compliance with Mitigation Measure 6.7-2 would ensure adequate parking is provided for any buses or oversized vehicles resulting in a *less-than-significant impact* for the Children's Theatre after mitigation. (DEIR, p. 6.7-48.)

Significance After Mitigation: Theatre The impact is less than significant after mitigation. (DEIR, p. 6.7-48.)

Impact 6.7-8: Intersections – The SMCS Project would increase traffic volumes at study intersections under 2025 conditions. (Less than Significant after Mitigation). (DEIR, p. 6.7-66.)

Finding: ***This impact will be reduced to less than significant levels through implementation of Mitigation Measure 6.7-3. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant environmental effect as identified in the DEIR.***

Explanation:
The SMCS Project would increase traffic volumes at study area intersections under year 2025 conditions. Figure 6.7-15 of the Draft EIR illustrates the a.m. and p.m. peak hour intersection volumes. Intersection geometry is illustrated in Figure 6.7-4. Table 6.7-29 summarizes conditions both with and without the SMCS Project. As discussed the changes in intersection operating conditions with the addition of project-generated traffic exceed the standards of significance for impacts to intersections. Operating conditions at the intersection at 27th Street and Capitol Avenue would degrade from LOS "A" to LOS "E" during the p.m. peak hour resulting in a ***significant cumulative impact***. (DEIR, p. 6.7-66.)

28th Street and Capitol Avenue – Operating conditions degrade from LOS "C" to LOS "D" during the p.m. peak hour.

Alhambra Boulevard and L Street - Operating conditions degrade from LOS "C" to LOS "D" during the p.m. peak hour.

Alhambra Boulevard and Capitol Avenue – Operating conditions remain at LOS "D" during the p.m. peak hour, with an increase in average vehicular delay of 10.8 seconds (DEIR, pp. 6.7-66-6.7-70.)

(DEIR, p. 6.7-70.)

Mitigation Measures: ***Implementation of Mitigation Measure 6.7-3 would ensure cumulative impacts to intersections would be reduced to a* less-than-significant level. *(DEIR, p. 6.7-70.)***
With this mitigation, operating conditions would improve to LOS "B" or LOS C during the p.m. peak hour.

Significance After Mitigation: **The impact is less than significant after mitigation. (DEIR, p. 6.7-66.)**

Impact 6.7-9: Freeway System – The SMCS Project would increase traffic volumes on the freeway system under year 2025 conditions (Significant and Unavoidable) (DEIR, p. 6.7-71.)

Finding:
Changes or alterations have been required in, or incorporated into, the Project that substantially lessen, but do not avoid, the Project's significant effects associated with traffic volumes on the freeway system. No feasible mitigation is available to render the effects less than significant. The effects therefore remain significant and unavoidable.

Explanation:
The SMCS Project would increase traffic volumes on the study area freeway system. Tables 6.7-30 through 6.7-32 of the EIR summarize the resultant conditions. The changes in freeway system operating conditions under year 2025 conditions with the addition of project-generated traffic would add traffic to a freeway system that is currently operating at LOS "F" which would exceed the level of significance. Intersection queuing on freeway exit ramps is not anticipated to extend into critical areas. Therefore, impacts to freeway systems are considered ***significant.*** (DEIR, p. 6.7-71.)

Mitigation Measures: ***No feasible mitigation measures are available to avoid adding more traffic to the freeway system under cumulative conditions. Therefore, the impact would be* significant and unavoidable. *(DEIR, p. 6.7-71.)***

Significance After Mitigation: **No mitigation is available to render the effects less than significant. The effects therefore remain significant and unavoidable. (DEIR, p. 6.7-71.)**

Impact 6.7-10: Intersections – The SMCS program and Trinity Cathedral Project would increase traffic volumes at study intersections under year 2025 conditions. (Less than Significant after Mitigation). (DEIR, p. 6.7-74.)

Finding:
This impact can be reduced to less than significant levels through implementation of Mitigation Measure 6.7-4. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant environmental effect as identified in the DEIR.

Explanation:
The SMCS program (includes Children's Theatre) in combination with the Trinity Cathedral Project would increase traffic volumes at study area intersections. Figure 6.7-16 of the EIR illustrates the a.m. and p.m. peak hour intersection volumes and Table 6.7-33 summarizes the resultant conditions. As discussed in the Trip Generation section, TSM measures could reduce trip generation and result in fewer impacts to intersections. (DEIR, p. 6-7-74.)

The SMCS program in combination with the Trinity Cathedral Project, would result in ***significant impacts*** to study intersections. (DEIR, p. 6.7-74.)

Mitigation Measures:
Implementation of Mitigation Measure 6.7-4 would reduce impacts on the intersections identified to a *less-than-significant level.* (DEIR, p. 6.7-74 through -78.)

Significance After Mitigation: **The impact is less than significant after mitigation. (DEIR, p. 6.7-74.)**

Impact 6.7-11: Freeway System – The SMCS program and Trinity Cathedral Project would increase traffic volumes on the freeway system under year 2025 conditions. (Significant and Unavoidable). (DEIR, p. 6.7-78.)

Finding:
Changes or alterations have been required in, or incorporated into, the Project that substantially lessen, but do not avoid, the Project's significant effects associated with traffic volumes on the freeway system under year 2025 conditions. No feasible mitigation is available to render the effects less than significant. The effects therefore remain significant and unavoidable.

Explanation:
The SMCS program (includes Children's Theatre) would increase traffic volumes on the study area freeway system. Operating conditions in the weaving area on southbound Capital City Freeway between the N Street entrance and the U.S. 50 exit would degrade from LOS "E" to LOS "F" in the p.m. peak hour. Because the project would contribute cars to a freeway system that is currently operating at LOS "F", the impacts are considered ***significant.*** (DEIR, p. 6.7-78.)

Mitigation Measures:
Implementation of Mitigation Measure 6.7-5 would ensure traffic flows would be metered onto the highway; however, because there would be an increase in vehicles, the impact is considered *significant and unavoidable*. (DEIR, p. 6.7-81.)

Significance After Mitigation: Significant **and unavoidable. (DEIR, p. 6.7-81.)**

Impact 6.7-12: Intersections – The SMCS Project (with Two-Way Conversion) would increase traffic volumes at study intersections under year 2025 conditions. (Significant and Unavoidable). (DEIR, p. 6.7-81.)

Finding:
Changes or alterations have been required in, or incorporated into, the Project that substantially lessen, but do not avoid, the Project's significant effects associated with intersection traffic volumes. No feasible mitigation is available to render the effects less than significant. The effects therefore remain significant and unavoidable.

Explanation:
The SMCS Project would increase traffic volumes at study area intersections. As discussed in the Trip Generation section of the EIR, TSM measures could reduce trip generation and result in fewer impacts to intersections. The changes in intersection operating conditions with the addition of project-generated traffic exceed the standards of significance for impacts to intersections. Therefore, the impacts are considered ***significant.*** (DEIR, p. 6.7-81.)

Mitigation Measures:
Implementation of Mitigation Measure 6.7-6 would help to minimize impacts to intersections, however, not to a less-than-significant level for all intersections. Therefore, the impact would remain significant and unavoidable. *(DEIR, p. 6.7-85.)*

Significance After Mitigation: **Significant and unavoidable. (DEIR, p. 6.7-85.)**

Impact 6.7-13: Freeway System – The SMCS Project would increase traffic volumes on the freeway system under year 2025 conditions. (Significant and Unavoidable). (DEIR, p. 6.7-85.)

Finding:
Changes or alterations have been required in, or incorporated into, the Project that substantially lessen, but do not avoid, the Project's potentially significant effects associated with intersection traffic volumes. No feasible mitigation is available to render the effects less than significant. The effects therefore remain significant and unavoidable.

Explanation:
The project would increase traffic volumes on the study area freeway system. Tables 6.7-38 through 6.7-40 of the EIR summarize the resultant conditions. The changes in freeway system operating conditions with the addition of project-generated traffic do not exceed the standards of significance for impacts to the freeway system. Intersection queuing on freeway exit ramps is not anticipated to extend into critical areas. Therefore, the impacts are considered ***significant***. (DEIR, p. 6.7-86.)

Mitigation Measures: ***No mitigation measures are available to avoid adding more traffic to the freeway system under cumulative conditions; therefore, the impact would be significant and unavoidable. (DEIR, p. 6.7-24.)***

Significance After Mitigation: **Less than significant without mitigation. (DEIR, p. 6.7-85.)**

Impact 6.7-14: Intersections – The SMCS program and Trinity Cathedral Project (with Two-Way Conversion) would increase traffic volumes at study intersections under year 2025 conditions. (Significant and Unavoidable). (DEIR, p. 6.7-86.)

Finding:
Changes or alterations have been required in, or incorporated into, the Project that substantially lessen, but do not avoid, the Project's significant effects associated with traffic volumes. No mitigation is available to render the effects less than significant. The effects therefore remain significant and unavoidable.

Explanation:
The SMCS program (includes Children's Theatre) in combination with the Trinity Cathedral Project would increase traffic volumes at study area intersections. Figure 6.7-18 illustrates the a.m. and p.m. peak hour intersection volumes. Intersection geometry is illustrated in Figure 6.7-11. Table 6.7-41 summarizes the resultant conditions. As discussed in the Trip Generation section, TSM measures could reduce trip generation rates resulting in fewer impacts to intersections. The changes in intersection operating conditions with the addition of project-generated traffic under the city's Two-Way Conversion project would exceed the standards of significance for impacts to intersections. Therefore, the impacts are considered ***significant***. (DEIR, p. 6.7-86.)

Mitigation Measures:
Implementation of Mitigation Measure 6.7-7 would help to offset impacts associated with the City's two-way conversion project, however there is no feasible mitigation measure to address the impact at 29th and J Streets. The cumulative impact to all of the intersections identified with

the exception of 28th and N Streets would be considered *significant and unavoidable*. (DEIR, p. 6.7-92.)

Significance After Mitigation: **After mitigation, the impact is significant and unavoidable. (DEIR, . 6.7-86.)**

Impact 6.7-15: Freeway System – The SMCS program and Trinity Cathedral Project (with Two-Way Conversion) would increase traffic volumes on the freeway system under year 2025 conditions. (Significant and Unavoidable) (DEIR, p. 6.7-92.)

Finding:
Changes or alterations have been required in, or incorporated into, the Project that substantially lessen, but do not avoid, the Project's significant effects associated with traffic volume. No feasible mitigation is available to render the effects less than significant. The effects therefore remain significant and unavoidable.

Explanation:
The SMCS program (includes Children's Theatre) in combination with the Trinity Cathedral Project would increase traffic volumes on the study area freeway system. Operating conditions in the weaving area on southbound Capital City Freeway between the N Street entrance and the US 50 exit degrade from LOS "E" to LOS "F" in the p.m. peak hour under the City's Two-Way Conversion project. (DEIR, pp. 6.7-93.)

Mitigation Measures: ***Compliance with improvements set forth in Mitigation Measures 6.7-8 and 6.7-4 would help to reduce traffic levels; however, the contribution of any traffic to the freeway system is considered a significant and unavoidable impact. (DEIR, p. 6.7-95, 6.7-74 – 6.7-78.)***

Significance After Mitigation: **Significant and unavoidable. (DEIR, p. 6.7-92.)**

Impact 6.7-16: Construction – Construction of the SMCS program and Trinity Cathedral Project would include the temporary closure of numerous transportation facilities, including portions of City streets, sidewalks, bikeways, and off-street parking. (Less than Significant after mitigation) (DEIR, p. 6.7-95.)

Finding:
This impact can be reduced through implementation of Mitigation Measure 6.7-9. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant environmental effect as identified in the DEIR.

Explanation:
As described in Chapter 2, Project Description of the EIR, the SMCS Project would be constructed over a multi-year period. Construction would include numerous disruptions to the transportation system in and around the project area, including temporary street closures, sidewalk closures, and bikeway closures. These short-term activities would result in degraded roadway operations. The addition of construction personnel would also result in a need for additional parking. The anticipated schedule of on-site parking removal and addition is shown in Table 2-9, in Chapter 2 of the EIR. The parking management program discussed in Chapter 2, Project Description, is intended to provide an adequate balance between parking demand and

supply during construction. In addition, construction of the Trinity Cathedral Project is anticipated to begin sometime in 2007 and be completed by 2009, resulting in additional impacts to roadways associated with construction traffic. Project construction activities for both the SMCS Project and the Trinity Cathedral Project could result in impacts to vehicle and pedestrian access in and around the project area. (DEIR, p. 6.7-96)

Mitigation Measures:
Implementation of Mitigation Measure 6.7-9 would reduce impacts associated with project construction to a less-than-significant level. *(DEIR, p. 6.7-96.)*

Significance After Mitigation: Less than significant after mitigation. (DEIR, p. 6.7-95.)

H. *UTILITY SYSTEMS*

WATER SUPPLY AND DISTRIBUTION

Impact 6.8-1. Implementation of the SMCS Project would not increase demand for potable water in excess of available supplies. (Less than Significant). (DEIR, p. 6.8-12.)

Finding:
Under CEQA, no mitigation measures are required for impacts that are less than significant (Pub. Resources Code, § 21002; CEQA Guidelines. §§ 15126.4, subd. (a)(3), 15091.)

Explanation:
Development of the SMCS Project, as shown in Table 6.8-4, would generate an additional water demand of 190,256 gpd; (211 AFY). Surface water from the American and Sacramento Rivers supply the project area. As discussed in the Environmental Setting, the City's current surface water entitlement totals 192,000 AFY. Overall water consumption for the year 2002/03 totaled 135,536 AF, leaving the City with an excess of 56,464 AFY. With a gross project demand of 230 AFY, the SMCS Project demand would represent approximately 0.4 percent of the City's remaining authorized supply. (DEIR, p. 6.8-12.)

Furthermore, construction phasing is timed such that access to available surface water would increase by the time the SMCS Project is fully complete. Specifically, construction of the SMF Building, the residential/retail/commercial component, and the Future MOB would be completed in 2006; the WCC is scheduled for completion in 2010. At the time that the SMCS Project is fully complete, water entitlements would be between 205,500 and 227,500 AFY. Thus, while the total project demand would be approximately 211 AFY, this would be for the project at completion (2010). This demand would be incurred incrementally and would be phased, as SMCS buildings are completed in accordance with the construction schedule. (DEIR, p. 6.8-12.)

The project area is served by several 8-inch water lines located in public rights-of-way. The alleys that would be affected by the SMCS Project also contain 8-inch mains. As part of the SMCS Project, however, new lines would be constructed in adjacent streets to compensate for lost capacity. Specifically, three additional 8-inch pipes are planned on adjacent streets and two additional 12-inch pipes in Capitol and N Streets between 27th and 28th Streets. (DEIR, p. 6.8-13.)

Theatre

The estimated water demand from operation of the Children's Theatre of California would be approximately 3,390 gpd or 1.1 mg per year (3.25 AFY), based upon six days of operation per week. This demand would represent approximately 0.006% of the current unused water supply. Actual demand would likely be lower than the above estimate, as the Children's Theatre would not operate throughout the entire year. In addition, as discussed above, distribution would not be negatively affected, because new mains would be constructed to replace the mains in the alleys that would be abandoned. (DEIR, pp. 6.8-14.)

Mitigation Measures: **None required.** ***(DEIR, p. 6.8-14.)***

Significance After Mitigation: **Less than significant without mitigation. (DEIR, p. 6.8-12.)**

Impact 6.8-2: The SMCS Project could result in inadequate treatment capacity to supply the SMCS Project with no plans or processes in place for obtaining needed infrastructure. (Less than Significant) (DEIR, p. 6.8-14.)

Finding:
Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation:
The water demand of the SMCS Project would be 190,256 gpd that would require treatment prior to delivery at the project site. The Sacramento River WTP and E.A. Fairbairn WTP have a combined capacity of 360 mgd (403,398 AFY). Based on Sacramento's 2002/2003 water demand of 116 mgd (59.2 mgd from the American River, 56.8 mgd from the Sacramento River), the treatment plants have a combined excess capacity of 244 mgd. The SMCS Project demand for water treatment would be 0.08 percent of the excess capacity available at the treatment plants. (DEIR, p. 6.8-14.)

Theatre

The Children's Theatre of California lies within the boundaries of the SMCS Project area. The site is relatively small compared to the SMCS Project and is unlikely to significantly impact capacity or treatment systems. Specifically, as discussed under Impact 6.8-1, it is estimated that 3.25 AFY in additional water demand would result from construction of the Theatre. The capacity discussion above for the SMCS Project explains that the existing treatment capacity for the City of Sacramento is approximately 360 mgd. (DEIR, p. 6.8-15.)

Mitigation Measures: **None required.** ***(DEIR, p. 6.8-15.)***

Significance After Mitigation: **The impact is less than significant without mitigation. (DEIR, p. 6.8-14.)**

Impact 6.8-3: The SMCS Project could result in inadequate water distribution infrastructure to supply the SMCS Project with no plans or processes in place for obtaining needed infrastructure. (Less than Significant). (DEIR, p. 6.8-15.)

Finding:
Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002: CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation:
As discussed in the EIR, existing water conveyance infrastructure in the project area consists of a series of 8 -inch water lines located in public right-of-ways. Water lines that serve the project area are located in: K Street from 30th to 28th Streets; 28th Street from K to N Streets; 29th Street between K and L Streets; L Street between 28th and 27th Streets; 26th Street between Capitol and L Streets; and Capitol Street between 28th and 29th Streets. (DEIR, p. 6.8-15.)

Alley and/or utility abandonment would occur in the alley by the existing Buhler Building, the alley behind Pioneer Church, and the alley in the Community Block, each of which contain an 8-inch main. Two abandonments would directly affect the SMCS Project and entail both physical and utility abandonments. These planned abandonments would affect primarily the SMF Building and the WCC. However, replacement conveyance lines would also be constructed as part of the project, and, as discussed above in Impact 6.8-1, capacity would increase due to newly constructed pipes. In addition, new public fire hydrants would be constructed at the mid-block of every frontage street. (DEIR, p. 6.8-15.)

The SMCS Project includes the construction of larger replacement pipes, which would ensure no additional expansion of distribution infrastructure would be required. In addition, the City requires that a water supply test be prepared to determine the capacity of the water lines. If existing infrastructure in the project vicinity is not sufficient to serve the project, the City would condition that the applicant provide their fair share of the funding for required improvements, which would ensure that adequate system capacity exists to secure the project site. The impact would be ***less than significant.*** (DEIR, p. 6.8-15 – 6.8-16.)

Theatre
The Children's Theatre of California would also be affected by the Community Block utility abandonment, and an 8-inch water main serving the block would be removed. However, as discussed above, the replacement mains that would be constructed on adjacent streets would increase conveyance capacity in the project area. In addition, the City's water system test would ensure the impact would be ***less than significant.*** (DEIR, p. 6.8-16.)

Mitigation Measures: **None required.** ***(DEIR, p. 6.8-16.)***

Significance After Mitigation: **The impact is less than significant without mitigation. (DEIR, p. 6.8-16.)**

Impact 6.8-4: The SMCS Project could increase water demand by more than 10 million gallons per day. (Less than Significant). (DEIR, p. 6.8-16.)

Finding:

No impact. Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation:
The various medical office uses, commercial and retail uses, residential units, and hospital facility associated with the SMCS Project would increase demand for water supply in the project area. (DEIR, p. 6.8-16.) As noted in Impact 6.8-1 the projected demand would be approximately 190,256 gpd (0.19 mgd) which is far below the 10 mgd threshold. Thus, ***no impact*** would occur and no mitigation is required. (DEIR, p. 6.8-16.)

Theatre

As noted above in Impact 6.8-1, the demand generated by the Children's Theatre of California would be approximately 3,400 gpd (0.003 mgd). This is far below the 10 mgd threshold and, as a result, ***no impact*** would occur. (DEIR, p. 6.8-16.)

Mitigation Measures: **None required.** ***(DEIR, p. 6.8-16.)***

Significance After Mitigation: No impact. No mitigation required. (DEIR, p. 6.8-16.)

Impact 6.8.5.

> **The SMCS Project, in combination with other development in the City of Sacramento, could increase demand for one or more of the following in excess of available supplies: potable water, water treatment, water capacity, and/or water infrastructure.** (Less than Significant) (DEIR, p. 6.8-17.)

Finding:
Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation:
The SMCS Project would increase the demand for water in the City's service area beyond the existing demand of approximately 136,000 AFY. However, as previously stated, the City's authorized supply under the WFA would also increase in the future. As shown in Table 6.8-2, the City's authorized supply in year 2030 would be 325,800 AFY. Therefore, the water demand would be required to more than double 2002/2003 demand in order to exceed the available supply. Although the City is in the process of updating its General Plan, it is highly unlikely that the Plan would include a doubling of the population over buildout of the Plan. In fact, population projections for Sacramento County as a whole, estimate that growth would occur at a rate of less than ten percent every 5 years. At that rate, it would take 40 to 45 years for population increases to generate demand equal to supplies. In addition, it is likely that the City would implement water-saving methods, such as metering water, which would reduce demand. Because that time far exceeds the typical timeline considered in a general plan, this impact would be considered less than significant. (DEIR, p. 6.8-17.)

In addition, although much of the Central City area is already developed, it is likely that the land uses within the Central City could intensify in the future as development pressure throughout the area increases. The intensification of uses could result in the need for upgrades in the City's

water distribution and/or treatment systems. As stated in Impact 6.8-3, the City would require a water system test for new development to ensure that the system capacity is sufficient to serve development. In addition, as previously stated, the City's treatment plants have a combined treatment capacity of 360 mgd, which is more than three times Sacramento's 2002/2003 water demand of 116 mgd. (DEIR, p. 6.8-17.)

Therefore, this project's contribution would not be cumulatively considerable resulting in a ***less-than-significant*** cumulative impact on water supplies and infrastructure. (DEIR, pp. 6.8-17-6.8-18.)

Mitigation Measures:
None required. (DEIR, p. 6.8-18.)

Significance After Mitigation:
The impact is less than significant without mitigation. (DEIR, p. 6.8-18.)

WASTEWATER AND STORM DRAINAGE

Impact 6.8-6.

> **The SMCS Project could result in or require the construction of new or expansion of existing wastewater collection or treatment facilities or exceed RWQCB requirements. (Less than Significant).** (DEIR, p. 6.8-25.)

Finding:
Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation:
Implementation of the SMCS Project would increase the amount of building space and population, which would result in the generation and discharge of additional wastewater requiring treatment at the SRWTP. (DEIR, p. 6.8-24.)

As shown in Table 6.8-5 of the EIR, the SMCS Project would generate approximately 0.15 mgd of wastewater requiring transportation and treatment in the CSS. Currently, the SRWTP treats an average of 165 mgd. The overall capacity of the SRWTP is 380 mgd, of which 60 mgd is dedicated to receiving flows from the City of Sacramento's CSS. During wet weather, when wastewater flows exceed maximum levels accepted by the SRWTP (60 mgd), the City diverts flows to the CWTP (130 mgd), resulting in a combined total capacity of 190 mgd. The additional 0.15 mgd generated by the SMCS Project could be adequately treated by existing infrastructure during dry weather conditions. However, the CSS presently experiences CSO's under existing conditions during severe storm events. Any increase in flows to the CSS during these conditions could result in a significant impact. (DEIR, p. 6.8-25.)

Existing infrastructure that serves the project area is discussed in the Environmental Setting section. (DEIR, p. 6.8-25.)

As discussed in Chapter 2, Project Description, three alleys would be affected through physical or utility abandonments. CSS facilities in the 28th/29th/L Street alley would be relocated to 28th Street and Capitol Avenue and would connect to the 78-inch combined sewer proposed by the City in 29th Street. The CSS facilities in the 27th/28th/Capitol Avenue/N Street alley would be

removed. The three buildings to remain along Capitol Avenue and 28th Streets (Café Bernardo's, Monkey Bar, and Capitol Physical Therapy) would be connected to the proposed CSS in 29th Street. The 27th/28th/Capitol Avenue/L Street alley would be subject to a utility abandonment. The City's CSS would be removed where in conflict with the new building. (DEIR, p. 6.8-25.)

The CSS line in the alley behind the Buhler Building and the Old Tavern building is currently leaking and presents a potential health and safety issue. SMCS proposes to install a new 12-inch lateral from the alley south along 28th Street to Capitol Avenue, then east to 29th Street. This relocated combined sewer would connect to the proposed 78-inch combined sewer to be constructed by the City in 29th Street. A new 12-inch combined sewer would be constructed in 28th Street from the alley south to N Street. This sewer would serve existing and new buildings. (DEIR, p. 6.8-26.)

The installation of replacement CSS lines would cause temporary disruptions within the public right-of-way. The transportation impacts of these construction operations are addressed in Section 6.7, Transportation and Circulation. The noise and air quality effects of construction are addressed in Section 6.2, Air Quality, and 6.6, Noise. Installing new CSS pipes could require dewatering, if the pipes are installed below the groundwater table. The impacts associated with potential dewatering activities are addressed in Section 6.5, Hydrology and Water Quality. (DEIR, p. 6.8-26.)

Localized flooding and CSOs occur during severe storm events, which would be exacerbated by additional flows from the SMCS Project. However, the City is currently implementing system-wide improvements to the CSS and the SMCS Project would be required to contribute funds toward City improvements to the CSS or, alternatively, complete on- or offsite improvements to store project wastewater during storm events. Absent system improvements, however, flooding and CSOs would continue. (DEIR, p. 6.8-26.)

However, compliance with the City's Combined System Development Fee ordinance would reduce the project impact by providing (1) additional capacity in the City's system to reduce the potential for flooding and CSOs system-wide, or (2) requiring storage of project flows to ensure that the proposed project would not contribute to flooding and CSOs. This would reduce this impact to a ***less-than-significant level.*** (DEIR, p. 6.8-26 – 6.8-27.)

Theatre

The building that comprises the Children's Theatre would include a total of 565 seats. The project would be required to comply with all applicable wastewater discharge requirements and NPDES permits, described above. (DEIR, p. 6.8-27.)

Wastewater generation from theatre venues are calculated on a per seat basis (0.3 ESD/100 seats). With 565 seats, the Children's Theatre would generate 678 gpd (.0001 mgd). This flow would constitute less than 0.001 percent of the system capacity. Because the CSS system does not have capacity during large storm events, the small increase in wastewater associated with the Theatre could result in a significant impact. As stated above, however, the Theatre project would be required to comply with the Combined System Development Fee Ordinance, which would reduce the impact to a ***less-than-significant level***. (DEIR, p. 6.8-27.)

Mitigation Measures:
None required (DEIR, p. 6.8-27.)

Significance After Mitigation:

The impact is less than significant without mitigation. (DEIR, p. 6.8-25.)

Impact 6.8-7:

> **The SMCS Project could create or contribute runoff water over pre-development conditions that would exceed the capacity of existing or planned stormwater drainage systems, including the City's CSS. (Less than Significant).** (DEIR, p. 6.8-27.)

Finding:

Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation:

SMCS Project

The SMCS Project is proposed for development on land that currently contains urban development with primarily impervious surfaces. Development of the SMCS Project would increase the amount of impervious surfaces by approximately 16,000 square feet, or four percent of the site (see Table 6.8-6). The loss of pervious surfaces would not create a significant increase in the amount of stormwater runoff from the site. (DEIR, p. 6.8-27.)

However, the site is drained by CSS facilities, which are considered impacted because of the lack of available capacity during large storm events. During dry weather conditions, the CSS has adequate capacity to accommodate flows from the project area, which would be primarily wastewater. During severe storm events, however, stormwater from the project area could exceed the capacity of the system. The City is currently implementing system-wide improvements to the CSS, including the new 78-inch line in 29th Street, and the SMCS Project would be required to comply with the recently adopted ordinance that requires payment of fees. Alternatively, the project could complete on- or off-site improvements to store project wastewater during storm events. Absent system improvements, however, flooding and CSOs would continue. (DEIR, p. 6.8-27 – 6.8-28.)

Compliance with the City's new Combined System Development Fee Ordinance would reduce the project impact by providing (1) additional capacity in the City's system to reduce the potential for flooding, or (2) requiring storage of project flows to ensure the project would not contribute to flooding and CSOs. This would be considered a ***less-than-significant impact***. (DEIR, p. 6.8-28.)

Theatre

The site of the proposed Children's Theatre of California lies within the SMCS Project area and currently contains impervious surfaces associated with the Trinity Apartments, EAP Building, and two existing surface parking lots, along with a vacant area containing pervious surface. Specific development plans for the Children's Theatre have not yet been prepared; therefore, the amount of impervious surface that would remain after project completion is unknown. It is assumed that future development would be required to comply with the City's combined System Development Fee Ordinance that would ensure project flows would not contribute to flooding and CSOs. Therefore, this is considered a ***less-than-significant impact***. (DEIR, p. 6.8-28.)

Mitigation Measures:
None required. (DEIR, p. 6.8-29.)

Significance After Mitigation:
The impact is less than significant without mitigation. (DEIR, p. 6.8-27.)

Impact 6.8-8:

> **The SMCS Project, in combination with other development within the CSS service area, could result in or require the construction of new or expansion of existing wastewater and stormwater collection or treatment facilities. (Less than Significant).** (DEIR, p. 6.8-29.)

Finding:
Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation:
The average daily dry weather flow at full build-out of the City General Plan is estimated at 129.1 mgd and peak flow is estimated at 305.9 mgd. The SRWTP currently receives an average dry weather flow of 155 mgd, less than its permitted capacity of 181 mgd of dry weather flow, so the SRCSD is not currently undergoing any expansions to the treatment plant. However, based on the Sacramento Area Council of Government's regional population projections, SRCSD's Regional 2020 Master Plan accommodates for expansions of the treatment plant as growth occurs. This plan is intended to ensure that the SRWTP facilities have sufficient capacity to meet planned growth in the service area through the year 2020. In addition, the Master Plan is updated every five years to account for changes in existing and projected population. Any necessary changes to capacity would occur incrementally, as regional population growth demands greater treatment capacity. (DEIR, p. 6.8-28.)

The Department of Utilities has completed many of the CSS Improvement and Rehabilitation Program projects, including the rehabilitation and upsizing of Sump 2, construction of new regional storage projects, and numerous rehabilitation and replacement projects throughout the system. The City continues to complete improvements according to the program, including additional storage facilities, and the improvement and expansion of existing facilities. The City has also identified improvements to the older portions of the City's CSS to meet increased demand, including future upgrades to the interceptors that connect into the SRWTP. As previously discussed, the City is implementing a new fee program to ensure that these

improvements are sufficiently funded. Therefore, with implementation of the existing programs to ensure that capacity is available as growth occurs, the project's contribution would not be cumulatively considerable; therefore, cumulative impact would be ***less-than-significant***. (DEIR, p. 6.8-29-6.8-30.)

Mitigation Measures:
None required. (DEIR, p. 6.8-30.)

Significance After Mitigation:
The impact is less than significant without mitigation. (DEIR, . 6.8-29.)

SOLID WASTE

Impact 6.8-9:

> **The SMCS Project could increase the production of solid waste in excess of available distribution or landfill capacity. (Less than Significant).** (DEIR, p. 6.8-37.)

Finding:

Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation:
The project would result in a net increase in solid waste generation above the current level within the project area. (DEIR, p. 6.8-37.) As shown in Table 6.8-8 of the EIR, the SMCS Project would generate 6,365 lbs/day (3.2 tons/day). It is uncertain at this time how solid waste services would be divided up among existing providers. However, if SMCS contracts with the City of Sacramento to provide all solid waste hauling, the SMCS Project's waste would be delivered to Anderson Landfill, the current destination for SMCS's solid waste. The 3.2 tons/day generated by the SMCS Project would constitute less than 0.2 percent of Anderson Landfill's maximum daily capacity. As described above, the Anderson Landfill has a remaining capacity of approximately 8 million tons. (DEIR, p. 6.8-37.)

Implementation of the SMCS Project would include demolition of existing buildings and the construction of new facilities, which would result in construction debris requiring disposal. Construction and Demolition (C&D) activities generate significant amounts of waste. The CIWMB has estimated that C&D waste represents approximately 28 percent of the total solid waste stream. The CIWMB does not have a specific generation rate for construction waste generated per square foot of new office/commercial or medical construction, however, construction of the SMCS Project would generate significant C&D waste. The C&D waste could be disposed of at a variety of landfills including Lockwood Landfill, Keifer Landfill, or Yolo County Landfill; however, as discussed above, the landfills that would potentially be used for the SMCS Project have adequate capacity and accept C&D waste that would result from the project. (DEIR, p. 6.8-37 – 6.8-38)

As discussed in Regulatory Setting, the SMCS Project is required to submit a statement of recycling information to the City's solid waste manager. This statement includes a site plan and design specifications including the materials to be recycled, a demolition and construction plan,

and description of proposed education/public relations programs. The construction plan includes measures to recycle the following demolition and scrap materials. (DEIR, p. 6.8-38.)

Concrete Pre-Cast Panels (building exterior)

Roofing Ballast (Re-use)

Metal Studs & Drywall

Lead Shielding

Copper & Steel Piping

Acoustical Ceiling & Grid

Carpeting (options based on manufacturer)

Light Fixture & Wiring

Hollow Metal Frames (steel)

Ductwork & Misc. Sheet Metal (Steel)

Packing Materials

Aluminum Window Frames

(DEIR, p. 6.8-39.)

A recycling plan for normal operations would also be submitted. This plan would outline how the hospital would continue to divert cardboard, mixed paper, and beverage containers from the waste stream. The operations recycling plan would also include specific information on internal policy including information on: materials to be recycled, locations of enclosures and size of containers for recycling and trash, an education plan that states how employees will be trained including signage for enclosures, identification of medical waste, hazardous waste, bio-hazardous waste, and universal waste items. The municipal code sets guidelines for the recycling capacity facilities must provide. According to the parameters set by the City, the SMCS Project would be required to provide approximately 8.7 cubic yards of recycling volume, according to their proposed land uses. (DEIR, p. 6.8-39.)

For general hospital/medical clinic land uses, no recycling volume requirement is set. Nonetheless, office and commercial land uses comprise a significant percentage of the overall SMCS Project and, thus, the recycling volume guidelines would significantly reduce demand placed on solid waste haulers. As shown in Table 6.8-7, in 2003, Sutter recycled 236,494 lbs, which totaled approximately 12 percent of all waste generated. Assuming a 10 percent diversion rate at the new WCC, solid waste generated at the hospital drops to approximately 3,900 lbs/day. (DEIR, p. 6.8-39.)

With no recycling included, the SMCS Project would generate approximately 1,162 tons of solid waste per year. This would increase Sacramento's total solid waste disposal by less than 0.3 percent. With implementation of required recycling programs, the increase in the solid waste

stream would be even less. Recycling programs can reduce the amount of solid waste by 50 to 80 percent, depending on how aggressive the program is. With conservative diversion rate estimates (10 percent for hospital use, 30 percent for all other uses), solid waste generated by the SMCS Project would be reduced to approximately 5,300 lbs/day (2.7 tons/day). (DEIR, p. 6.8-39.)

Disposal of solid waste from the jurisdiction of the City of Sacramento generally does not impact capacity at receiving landfills because the waste is widely distributed among a variety of landfills, as described in the setting section. Compliance with the City recycling code would ensure implementation of the SMCS Project would not require the expansion or construction of landfills; therefore, this impact would be considered ***less than significant***. (DEIR, p. 6.8-39 – 6.8-40.)

Theatre

The proposed Children's Theatre of California lies within the boundaries of the SMCS Project area. According to estimated generation rates provided by the CIWMB, service establishments such as theatres can generate up to 3.12 lbs of solid waste per 100 sf per day (lbs/sf/day). According to this rate, the proposed 50,000 square foot Children's Theatre could generate up to about 1,560 lbs/day (or 285 tons per year) of additional solid waste. (DEIR, p. 6.8-40.)

It is uncertain at this time which service provider, and thus, which landfill would be used by the theatre. However, as discussed above, the project would be required to implement recycling programs in compliance with City code. Again, assuming a diversion rate of 30 percent, the waste generated would drop to about 1,092 lbs/day. It is anticipated that the solid waste would be delivered to a landfill with adequate space to accommodate the waste. Impacts would, therefore, be considered ***less than significant***. (DEIR, p. 6.8-40.)

Mitigation Measures:
None required. (DEIR, p. 6.8-40.)

Significance After Mitigation:

Less than significant without mitigation. (DEIR, p. 6.8-37.)

Impact 6.8-10:

> **The SMCS Project could substantially increase the production of recyclable solid waste in excess of available materials recovery facility (MRF) capacity. (Less than Significant).** (DEIR, p. 6.8-40.)

Finding:

Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation:
It was determined in Impact 6.8-8 that solid waste facilities serving the project area have adequate capacity to meet the project demands. The Sacramento Recycling and Transfer Station currently accepts an average of 2,000 tons per day, and is permitted to process up to

3,000 tons/day. As discussed above, the project would generate approximately 3.2 tons/day of solid waste. The SMCS Project would constitute less than 0.2 percent of the materials received daily at the MRF. The current operating capacity of the Sacramento Recycling and Transfer Station would accommodate the demand associated with the SMCS Project; therefore, impacts are considered ***less than significant***. (DEIR, p. 6.8-40.)

Theatre

The Children's Theatre of California would generate less than one ton of solid waste each day. This would represent approximately 0.04 percent of the daily throughput at the Sacramento Recycling and Transfer Station. The MRF would have adequate capacity to accommodate solid waste generated by the theatre; therefore, impacts are, considered ***less than significant***. (DEIR, pp. 6.8-41.)

Mitigation Measures:
None required. (DEIR, p. 6.8-41.)

Significance After Mitigation:

The impact is less than significant without mitigation. (DEIR, p.6.8-40.)

Impact 6.8-11:

> **The SMCS Project could generate more than 500 tons of solid waste per year. (Significant and Unavoidable).** (DEIR, p. 6.8-41.)

Finding: ***Changes or alterations have been required in, or incorporated into, the SMCS Project that substantially lessen, but do not avoid, the Project's significant effects associated with production of recyclable solid waste. No feasible mitigation is available to render the effects less than significant. The effects therefore remain significant and unavoidable.***

The Theatre project will not result in significant impacts and no mitigation is required. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation

SMCS Project

The SMCS Project would generate more than 500 tons of solid waste per year. Assuming a 30 percent recycling rate for the office, residential, and commercial uses and a 10 percent recycling rate for the hospital, the SMCS Project could generate over 1,000 tons/year. This would be considered a ***significant impact.*** (DEIR, p. 6.8-41.)

Theatre

Construction of the Children's Theatre of California, assuming a 30 percent rate of recycling, would produce approximately 200 tons of solid waste per year. This is less than the threshold 500 tons, resulting in a ***less-than-significant impact***. (DEIR, p. 6.8-41.)

Mitigation Measures:

No additional mitigation measures would reduce the solid waste generated by the SMCS Project to less than 500 tons/year; therefore, this impact would remain *significant and unavoidable*. (DEIR, p. 6.8-41.)

Significance After Mitigation:
No mitigation is available to render the effects less than significant. The effects therefore remain significant and unavoidable. (DEIR, p. 6.8-41.)

Theatre – The impact is less than significant without mitigation. (DEIR, p. 6.8-41.)

CUMULATIVE IMPACTS

Because the 500 ton per year standard applies to individual projects, it would not logically apply to cumulative development. The cumulative analysis is based on the project's contribution and potential impact on landfills. The cumulative context for solid waste services includes all development in the Sacramento Regional County Solid Waste Authority service area. This includes the cities of Sacramento and Citrus Heights and unincorporated areas of the County. (DEIR, pp. 6.8-41-6.8-42.)

Impact 6.8-12:

> **The SMCS Project, in combination with other development, could substantially increase the production of solid waste in excess of available distribution or landfill and MRF capacity without also including provisions to adequately accommodate the increased production. (Less than Significant).** (DEIR, p. 6.8-42.)

Finding:
Under CEQA, no mitigation measures are required for impacts that are less than significant. (Pub. Resources Code, § 21002; CEQA Guidelines, §§ 15126.4, subd. (a)(3), 15091.)

Explanation:
A number of landfills operate in the Sacramento region, and landfills outside the region also serve Sacramento's solid waste needs. The Lockwood Landfill, the primary destination for waste collected by the City of Sacramento, has no expected closure date and 32.5 million cubic yards of capacity. Anderson Landfill, which would receive medical waste generated in the Sacramento region, is not expected to reach capacity for another 20 years. As growth continues in the region, in accordance with the County General Plan and city general plans, population would increase and the solid waste stream would continue to grow. Implementation of the Solid Waste Authority and Sacramento recycling requirements, however, would continue to reduce potential impacts on landfill capacity. The existence of significant capacity at the

City's primary landfills, the exporting of solid waste, and aggressive recycling policy indicate that the project's contribution on a cumulative level would not be considered significant. Therefore, the SMCS Project would result in a ***less-than-significant cumulative impact***. (DEIR, p. 6.8-42.)

Mitigation Measures:
None required. (DEIR, p. 6.8-42.)

Significance After Mitigation:

The impact is less than significant without mitigation. (DEIR, p. 6.8-42.)

VI. GROWTH INDUCEMENT

CEQA requires a discussion of the ways in which the Project could be growth inducing. CEQA also requires a discussion of ways in which a project may remove obstacles to growth, as well as ways in which a project may set a precedent for future growth. CEQA Guidelines Section 15126.2, subdivision (d), identifies a project as growth inducing if it fosters economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. New employees from commercial and industrial development and new population from residential development represent direct forms of growth. These direct forms of growth have a secondary effect of expanding the size of local markets and inducing additional economic activity in the area. Examples of development that would indirectly facilitate growth include the installation of new roadways or the construction or expansion of water delivery/treatment facilities. The Project's growth inducing impacts are discussed below

Elimination of Obstacles to Growth

The elimination of physical or regulatory obstacles to growth is considered a growth-inducing effect. The proposed SMCS Project would be developed in a built-out, highly urbanized area in midtown Sacramento; however, some physical constraints to growth currently exist in the vicinity of the project sites. The primary growth obstacles in the project area include:

- Limited capacity of the City's combined sewer and storm drain system (CSS) serving this portion of the City of Sacramento.

Both the combined sewer and storm drain system serving the project area are at or beyond capacity during severe storm events. Although the SMCS, housing, Theatre and Trinity Cathedral Projects would both contribute flows to these systems and would likely contribute funding to their expansion or other improvements, these improvements would be made regardless of whether the either project is constructed. (DEIR, p. 9-5.)

Economic Effects

Increased Demand on Secondary Markets

In addition to the employment generated by the proposed SMCS and Trinity Cathedral Projects, additional local employment can be generated through what is commonly referred to as the "multiplier effect." The multiplier effect tends to be greater in regions with larger diverse

economies due to a decrease in the requirement to import goods and services from outside the region. (DEIR, p. 9-5.)

Two different types of additional employment are tracked through the multiplier effect. *Indirect* employment includes those additional jobs that are generated through the expenditure patterns of direct employment associated with a project. For example, workers of the proposed SMCS and Trinity Cathedral Projects would spend money in the local economy, and the expenditure of that money would result in additional jobs. Indirect jobs tend to be in relatively close proximity to the places of employment and residence. (DEIR, p. 9-5.)

The multiplier effect also calculates *induced* employment. Induced employment follows the economic effect of employment beyond the expenditures of the employees within the project area to include jobs created by the stream of goods and services necessary to support businesses within the project area. For example, when a manufacturer buys products or sells products, the employment associated with those inputs or outputs is considered *induced* employment. (DEIR, p. 9-5.)

For example, when an employee from either SMCS or Trinity goes out to lunch, the person who serves the project employee lunch holds a job that was *indirectly* caused by either project. When the server then goes out and spends money in the economy, the jobs generated by this third-tier effect are considered *induced* employment. (DEIR, p. 9-5.)

The multiplier effect also considers the secondary effect of employee expenditures. Thus, it includes the economic effect of the dollars spent by those employees who support the employees of the project. (DEIR, p. 9-5.)

Increased future employment generated by resident and employee spending ultimately results in physical development of space to accommodate those employees. It is the characteristics of this physical space and its specific location that will determine the type and magnitude of environmental impacts of this additional economic activity. Although the economic effect can be predicted, the actual environmental implications of this type of economic growth are too speculative to predict or evaluate, since they can be spread throughout the Sacramento metropolitan region and beyond. (DEIR, p. 9-6.)

While the proposed SMCS and Trinity Cathedral Projects would contribute to direct, indirect, and induced growth in the area, they would contribute to enhancing the vitality of the Central City area, which is a goal of the City's General Plan and the Central City Community Plan (DEIR, p. 9-6.)

Increased Pressure on Land Use Intensification

Unforeseen future development can be spurred by the construction of certain projects that have the effect of creating unique and currently unmet market demands, or by creating economic incentives for future projects by substantially increasing surrounding property values. These types of impacts are most often identified for projects developed in areas that are currently lacking a full spectrum of economic activity. For example, newly developing office areas may be lacking in a full range of support commercial uses; this support commercial demand can cause increased pressure for rezones or general plan amendments aimed at providing adequate land to accommodate businesses seeking to serve the unmet demand. (DEIR, p. 9-6.)

The SMCS Project and Trinity Cathedral Project are both located in a developed area of the city. Both of these uses currently support the existing community as well as a larger regional area. The development of these uses are not anticipated to increase the pressure for additional new growth in the city or in out lying areas. (DEIR, p. 9-6.)

Impacts of Induced Growth

While growth in the Central Business District area of the City is an intended consequence of the proposed SMCS and Trinity Cathedral Projects, growth induced directly and indirectly by the projects could also affect the greater Sacramento area. However, neither of these projects would be considered growth-inducing because they do not introduce a new population or generate the need for new employees. Any new development would contribute to increased traffic congestion; air quality deterioration; impacts on utilities and services such as fire and police protection, water, recycled water, wastewater, solid waste, energy, and natural gas; and increased demand for housing. (DEIR, p. 9-6.)

Specifically, an increase in population-growth-induced housing demand in the greater Sacramento region to house workers employed by the proposed SMCS or Trinity Cathedral Project could cause environmental effects as new residential development would require governmental services, such as schools, libraries, and parks. Indirect and induced employment and population growth would further contribute to the loss of open space because it would encourage conversion to urban uses for housing and infrastructure. However, SMCS plans on relocating staff from Sutter Memorial Hospital to the new Women's and Children's Center and the SMF Building so it is not anticipated that there would be the need for a significant number of new employees. (DEIR, p. 9-6.)

VII. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL EFFECTS

The State CEQA Guidelines mandate that an EIR address any significant irreversible environmental changes which would be involved if the proposed project is implemented. (CEQA Guidelines, § 15126.2, subd. (c).) An impact would fall into this category if:

- The project would involve a large commitment of nonrenewable resources;
- The primary and secondary impacts of a project would generally commit future generations to similar uses (e.g. a highway provides access to a previously remote area);
- The project involves uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- The phasing of the proposed consumption of resources is not justified (e.g., the project involves a wasteful use of energy).

Development of the SMCS and Trinity projects would result in the continued commitment of the project area to more intense urban development, thereby precluding any other uses for the lifespan of the project. Restoration of the site to a less developed condition would not be

feasible given the degree of disturbance, the urbanization of the area, and the level of capital investment. (DEIR, p. 9-3.)

The CEQA Guidelines also require a discussion of the potential for irreversible environmental damage caused by an accident associated with the project(s). While the project(s) would result in the use, transport, storage, and disposal of hazardous wastes, as described in the Hazardous Materials and Public Safety sections 6.4 and 7.4, all activities would comply with applicable State and federal laws related to the use, storage and transport of hazardous materials, which significantly reduces the likelihood and severity of accidents that could result in irreversible environmental damage. (DEIR, p. 9-3.)

Implementation of either the SMCS or Trinity project would result in the long-term commitment of resources to urban development. The most notable significant irreversible impacts are increased generation of pollutants, and the short-term commitment of non-renewable and/or slowly renewable natural and energy resources, such as mineral resources and water resources during construction activities. Operations associated with future uses would also consume natural gas and electrical energy. These unavoidable consequences of urban growth are described in the appropriate sections in Chapters 6 and 7 of the EIR and the Initial Study in Appendix A. (DEIR, p. 9-3.)

Resources that would be permanently and continually consumed by project implementation include water, electricity, natural gas, and fossil fuels; however, the amount and rate of consumption of these resources would not result in the unnecessary, inefficient, or wasteful use of resources. With respect to operational activities, compliance with all applicable building codes, as well as mitigation measures, planning policies, and standard conservation features, would ensure that all natural resources are conserved to the maximum extent possible. It is also possible that new technologies or systems will emerge, or will become more cost-effective or user-friendly, to further reduce the reliance upon nonrenewable natural resources. Nonetheless, construction activities related to project development would result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobiles and construction equipment. (DEIR, p. 9-3 – 9-4.)

Both projects have been designed to comply with Title 24 of the California Code of Regulations (California's Energy Efficiency Standards for Residential and Nonresidential Buildings) requirements, which include lighting and other energy conservation measures, and include up-to-date energy-saving equipment. Lighting conservation efforts in new construction include installation of occupancy sensors to automatically turn off lights when not in use, lighting reflectors, electronic ballasts, and energy-efficient lamps. Conservation efforts are also expected to involve improved HVAC systems with microprocessor-controlled energy management systems. (DEIR, p. 9-4.)

VIII. CONSISTENCY WITH APPLICABLE PLANS

CEQA Guidelines Section 15125, subdivision (d), requires that any inconsistencies between a proposed project and applicable general plans and regional plans be discussed. The SMCS project and the Trinity Cathedral project are both evaluated for compatibility with the existing and planned land uses, consistency with zoning and applicable policies, including the goals and policies of the City's General Plan and CCCP. (DEIR, p. 4-16.) The following discussion addresses consistency with the relevant City's General Plan and Sacramento Central City Community Plan ("CCCP").

The SMCS project would require a General Plan Amendment (GPA) to modify existing land use designations from Regional Commercial Office (RCO) to Public/Quasi Public Miscellaneous (PQPM) and High Density Residential (HDR) to Community Neighborhood Commercial and Office (CNCO), as shown in Table 4-1. As stated in the Regulatory Context section, the General Plan includes specific goals and policies designed to support a balanced system of quality medical facilities (Goal A) that would be considered applicable to the SMCS project. The SMCS project proposes to amend the current General Plan land use designations to meet the intent of this goal, which is for the City to support a balanced system of quality medical facilities. The SMCS project would be considered consistent with the intent of the City's goals and policies pertaining to the provision of medical facilities. (DEIR, p. 4-23.)

The CCCP would also be required to be amended to accommodate the SMCS project. The existing CCCP designations for the SMCS project area include General Commercial, Residential/Office, and Multi-Family Residential. The SMCS project proposes a Community Plan Amendment (CPA) to change RO and MF to GC, as shown in Table 4-1. These designations are consistent with surrounding uses and would be consistent with the land uses that currently exist in the area. (DEIR, p. 4-23.)

There are currently various zoning districts on the site that would be rezoned to accommodate the SMCS project. The SMCS project includes new hospital uses, medical offices, parking facilities, retail/commercial, theatre, and residential. These uses would be allowed in the zoning districts proposed for the project and would, therefore, be consistent with the city's zoning. It should be noted that prior to rezoning the site, the Planning Commission and the City Council would need to make a determination as to whether the proposed zoning would result in any incompatibilities with adjacent uses. The proposed zoning would allow uses consistent with those found in an urban area. As shown in the description of these districts in the Regulatory Setting, there would be no inherent incompatibilities with this mix of uses and, in fact, the Residential-Office (RO) zone is intended to include its own internal mix of office and residential. Assuming that uses allowed in each district comply with its regulations, these uses would be considered compatible with one another. (DEIR, p. 4-23.)

As part of the project, a height variance has been requested for the WCC because the proposed building height is in conflict with the Alhambra Corridor design guidelines. The City would review these changes to ensure consistency with the City's zoning ordinance. As with the rezone request, the variance for building height would be reviewed by the Planning Commission and the City Council, thus, the determination of consistency would be at the discretion of those entities. (DEIR, p. 4-23.)

The City hereby finds that the SMCS Project is consistent with all applicable plans, including the General Plan and the CCCP for the reasons set forth in the EIR, in the staff reports, and in these findings. The City further finds that the Project is not inconsistent with any mandatory and fundamental General Plan or CCCP policies.

IX. PROJECT ALTERNATIVES

Where a lead agency has determined that, even after the adoption of all feasible mitigation

measures, a project as proposed will still cause one or more significant adverse environmental effects that cannot be substantially lessened or avoided, the agency, prior to approving the project as mitigated, must first determine whether, with respect to such impacts, there remain any project alternatives that are both environmentally superior and feasible within the meaning of CEQA. As noted earlier in these Findings, an alternative may be "infeasible" if it fails to fully promote the lead agency's underlying goals and objectives with respect to the project. Thus, "feasibility" under CEQA encompasses "desirability" to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social and technological factors. (*City of Del Mar*, *supra*, 133 Cal.App.3d at p. 417; see also *Sequoyah Hills*, *supra*, 23 Cal.App.4th at p. 715.)

In short, CEQA requires that the lead agency adopt mitigation measures or alternatives, where feasible, to substantially lessen or avoid significant environmental impacts that would otherwise occur. Project modifications or alternatives are not required, however, where such changes are infeasible or where the responsibility of modifying the project lies with some other agency (CEQA Guidelines, § 15091, subds. (a), (b).)

The detailed discussion in Section VIII demonstrates that nearly every significant effect identified in the EIR has been at least substantially lessened, if not fully avoided, by the adoption of feasible mitigation measures. The Project would nevertheless result in significant and unavoidable direct and cumulative impacts. Specifically, the Project would result in significant and unavoidable impacts on the following:

The SMCS Project would result in the following significant and unavoidable cumulative impacts:

- Construction of the SMCS Project would increase emissions of nitrogen oxide (NO_x) generated by construction on a short-term basis (6.2-3.)
- Operation of the SMCS Project would general an increase in ROG and NO_x (criteria pollutants) (6.2-4.)
- Construction activities of the SMCS Project would intermittently generate noise levels above existing ambient levels in the project vicinity on a short-term basis (6.6-1.)
- The SMCS Project and the Children's Theatre would increase traffic volumes on the freeway system (6.7-2.)
- The SMCS Project and the Children's Theatre would increase demand for parking (6.7-6.)
- The SMCS Project would generate more than 500 tons of solid waste per year. (6.8-11.)

(DEIR, pp. 3-3 – 3.4.)

The SMCS Project would result in the following significant and unavoidable cumulative impacts:

- The SMCS Project, in combination with other projects in the Sacramento Valley Air Basin, could result in a cumulative impact on criteria pollutants associated with project operation (6.2-8);

- The SMCS Project would increase traffic volumes on the freeway system under year 2025 conditions (6.7-9);
- The SMCS program and Trinity Cathedral Project would increase traffic volumes at study intersections under year 2025 conditions (6.7-10);
- The SMCS program and Trinity Cathedral Project would increase traffic volumes on the freeway system under year 2025 conditions (6.7-11);
- The SMCS Project (with Two-Way Conversion) would increase traffic volumes at study intersections under year 2025 conditions (6.7-12);
- The SMCS program and Trinity Cathedral Project (with Two-Way Conversion) would increase traffic volumes at study intersections under year 2025 conditions (6.7-14); and
- The SMCS program and Trinity Cathedral Project (with Two-Way Conversion) would increase traffic volumes on the freeway system under year 2025 conditions (6.7-15).

(DEIR, p. 3-4.)

The City can fully satisfy its CEQA obligations by determining whether any alternatives identified in the EIR are both feasible and environmentally superior with respect to these impacts. If the City determines that no alternative is both feasible and environmentally superior with respect to the significant and unavoidable impacts identified in the EIR, the City may approve the Project as mitigated, after adopting a statement of overriding considerations. As illustrated below, no identified alternative qualifies as both feasible and environmentally superior with respect to these unmitigable impacts. Only the proposed project is feasible in light of the project objectives and other considerations.

A. Alternatives Considered and Dismissed from Further Consideration as Infeasible.

The following alternatives for the SMCS Project were considered but rejected from further analysis because none of the alternatives listed below were determined to be feasible. (DEIR, p. 8-5.)

Seismic upgrade to Sutter Memorial Hospital: To address the need to comply with SB 1953, the option of upgrading the existing SMH was contemplated. However, due to the costs associated with retrofitting this existing facility it was determined this was not a feasible option. Under this alternative, additional space for medical offices would need to be developed elsewhere in the City or the region. This option does not meet a majority of the project objectives identified in Chapter 2. (DEIR, p. 8-5.)

Relocate Cardiac Services to Sutter General Hospital and Develop a new Women's and Children's Center at SMH: The option of relocating some services to SGH from SMH was considered, along with developing a new women's and children's tower at the existing SMH. This option was contemplated but dismissed because it would be very costly to upgrade the existing SMH to meet current codes and to construct a new portion of the hospital. Adequate parking also became a concern under this alternative. In addition, this alternative would not meet one of the primary project objectives to consolidate all acute care facilities presently at Sutter Memorial Hospital and Sutter General Hospital into one complex. (DEIR, p. 8-6.)

Close SMH and Relocate Services to SGH or throughout the Region: The option of closing SMH and relocating all of the hospital services to SGH or to other Sutter facilities throughout the region was also considered. However, it was determined that SGH was not large enough to absorb the critical hospital functions required. Distributing these services/functions throughout the region would not assist Sutter in their quest to consolidate these services in one area. This alternative option was considered but dismissed because it was determined to not be feasible. (DEIR, p. 8-6.)

B. Summary of Alternatives Considered

The DEIR identified the following five potentially feasible alternatives to the Project: No Project/No Action Alternative; Smaller SMF Building Alternative; SMCS Reduced Size Alternative; SMCS Full Parking Supply Alternative; and the SMCS Off-Site Alternative. Each of these alternatives for the SMCS Project is summarized below.

- SMCS No Project/No Action Alternative, which assumes that the SMCS Project would not be developed but development could occur on any undeveloped land owned by SMCS within the project area. This alternative assumes uses at Sutter Memorial Hospital (SMH) would not change and the existing Sutter General Hospital (SGH) and Buhler Building would remain, the same as all the other existing structures.

- **Smaller SMF Building Alternative**, assumes the Specialty Care medical office uses (63,400 +/- sf) would not be constructed in the SMF Building thereby reducing the overall size of the building. The medical uses proposed to relocate into the SMF Building would stay where they are currently located.

- **SMCS Reduced Size Alternative,** this alternative assumes the WCC, Energy Center, Housing and Community Parking Structure would be constructed but the SMF Building and Future MOB would not be constructed.

- **SMCS Full Parking Supply Alternative,** this alternative assumes the Community Parking Structure would be larger in order to accommodate the parking demand of the SMCS Project, Trinity Cathedral and the Children's Theatre on-site.

- **SMCS Off-Site Alternative,** this alternative assumes the SMCS Project would be constructed on an approximately 40-acre parcel of land located in North Natomas. Under this alternative the WCC, SGH and the SMF Building would be constructed at this location creating a new medical complex.

Each of the alternatives is described in detail below, followed by an assessment of the alternative's impacts relative to the SMCS Project. The focus of this analysis is the difference between the alternative and the project. For each issue area, the analysis indicates which mitigation measures would be required of the alternative, and which significant and unavoidable impacts identified as part of the project would be avoided or which significant impacts reduced in severity. In some cases, the analysis indicates what additional mitigation measures, if any, would be required for the alternative being discussed, and what significant and unavoidable impacts would be more (or less) severe. Unless otherwise indicated, the level of significance

and required mitigation would be the same for the alternative as for the project and no further statement of the level of significance is made. (DEIR, p. 8-14.)

SMCS Project Alternatives

SMCS No Project/No Action Alternative

Description

Under CEQA, the No Project (No Action) Alternative must consider the effects of foregoing the project. The purpose of analyzing the No Project Alternative is to allow decision makers to compare the impacts of the Proposed Project versus no project. The No Project Alternative describes the environmental conditions that exist at the time the Notice of Preparation (NOP) is published, or if no NOP is published, at the time environmental analysis commences, or well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services (CEQA Guidelines, section 15126.6(e)(2)).

Under the SMCS No Project Alternative the WCC, SMF Building, Community Parking Structure, Energy Center, Housing and Future MOB as well as the Children's Theatre of California would not be constructed. The existing buildings within the SMCS Project area would remain with no further modifications and SMH would not be closed. Existing medical office uses would remain where they are currently located and would not relocate. However, for the purposes of this analysis it is assumed that any vacant land within the SMCS Project area would be developed consistent with the underlying land use designation and zoning for the site. All of the undeveloped land within the SMCS Project area is owned by SMCS. (DEIR, p. 8-15.)

Undeveloped land within the SMCS Project area includes the ½ to ¾ of a block bounded by N Street to the south, Capitol Avenue to the north, 27th Street to the west and 28th Street to the east (location of the proposed Community Parking Structure) and the "green lot" surface parking lot located at the corner of 28th and L Streets (location of the proposed SMF Building). The undeveloped land owned by SMCS is currently being used for surface parking. Under the City's General Plan land use designations the parcel located between Capitol Avenue and N Street (proposed site of the Community Parking Structure) is designated for High Density Residential and Community/Neighborhood Commercial & Offices. The site is zoned Multi-Family (R-3A-SPD) and General Commercial (C-2). The parcel located at 28th and L Streets is designated for Regional Commercial & Office and is zoned Office Building (OB). Under the City's Zoning Ordinance the maximum density for the R-3A zone is 36 units per acre. Approximately half of the 1.7 acre site is designated for residential uses with the remainder designated for Community/Neighborhood Commercial & Office. Therefore, assuming the maximum density of 36 units/acre a total of up to 42 residential units could be constructed. For the purposes of this analysis based on the land use and zoning an approximately 35-foot tall, 17,000 square foot commercial use could be developed on the remainder of the site. Assuming the current land use and zoning an approximately 35-foot tall 29,750 square foot office building or 21 residential units could be constructed on the parcel located at 28th and L Streets. (DEIR, p. 8-16.)

Comparative Environmental Effects

Under the No Project/No Action Alternative, the existing structures within the SMCS Project area would remain and the area would not be redeveloped with the exception of the existing surface parking area located between N Street and Capitol Avenue, 27th and 28th Streets and the surface parking lot located at the corner of 28th and L Streets. Operations at SGH and the Buhler Building would continue and improvements to those buildings previously anticipated to occur (that are not subject to environmental review) would still happen. The existing St. Luke's Medical Office Building and parking garage, MTI office buildings, House of Furs building, (former) RAS Building, Old Tavern garage and associated office uses, and EAP office building would not be removed. It is assumed that any unoccupied buildings could be occupied with office and/or medical office uses in the future and that the undeveloped parcels could be developed with High Density Residential (multi-family), General Commercial and Office uses. (DEIR, p. 8-16.)

All of the existing buildings proposed for demolition would not be removed, but there could be limited development on the two undeveloped parcels within the project area. It is assumed any new development would meet the City's existing land use and zoning requirements; therefore, any new building would not exceed the current 35-foot height limitation. From an aesthetics standpoint, there would be very little change in the visual character of the area. However, new office and residential uses could be constructed at the two undeveloped parcels which include the corner of 28th and L Streets and on the site of the proposed Community Parking Structure. These new uses would be limited to a 35-foot height limitation and would be subject to the City's design review process. Construction of any new buildings in this area would contribute to a change in the visual character, but it would not be considered significant. The environment is urban and is designated for development under the City's General Plan. Assuming future development of these sites is consistent with the City's Design Review Board the change in the visual character and aesthetics would not be considered significant, the same as the SMCS Project. If all of the existing buildings were fully occupied, the building occupants' would generate increased traffic and parking demand when compared to existing conditions, but not on the same scale as the SMCS Project. It is unlikely that traffic generated under this alternative would result in any significant traffic or parking impacts. Under existing conditions there is adequate parking available and the roadway system is not adversely impacted. Under this alternative it is anticipated there would be no significant impacts to intersections, the freeway system, pedestrian, bicycle, transit, or parking associated with development. (DEIR, p. 8-16.)

Air emissions anticipated to occur due to construction of the SMCS Project would be substantially reduced under the No Project Alternative because only two parcels could be developed. Assuming these buildings are built at the same time and on different parcels, peak NO_x levels of 121.75 pounds per day could occur. Emissions associated with project operation would be less than the SMCS Project, as shown in Table 8-3. Noise associated with project construction would also be significantly reduced under this alternative because construction would be limited to two sites, there would be no building demolition, and no helicopter operations would occur because the new WCC would not be constructed. (DEIR, p. 8-17.)

Because building demolition would not occur, public safety impacts to construction workers and the general public associated with building demolition and the generation of fugitive dust would not be a concern. Increases in stormwater flows and contributions to the City's Combined Sewer System (CSS) would be less than the SMCS Project because overall less development is

planned. However, there might be a small increase due to occupying buildings that are currently unoccupied and development of new commercial and housing uses; however, compared to the SMCS Project the contribution to the CSS would be small, as shown in Table 8-3. Any increase in water demand or wastewater services would be less than the SMCS Project and no significant impacts are anticipated to occur. The increase in wastewater flows could result in impacts to existing infrastructure, the same as the SMCS Project. The amount of solid waste that would be generated would be less than the SMCS Project, and would not exceed the City's threshold of 500 tons of solid waste per year (see Table 8-3). (DEIR, p. 8-17.)

Mitigation That Would No Longer Be Required

A majority of the mitigation measures identified under the SMCS Project would no longer be required under the No Project Alternative because development would be limited. However, it is anticipated that if any new construction were to occur on the land currently undeveloped (28th/L Street and Community Block) the following mitigation measures would still be required. Mitigation measures required to mitigate potential impacts associated with the increase in air pollutants (see Mitigation Measures 6.2-2, 6.2-3) and noise (see Mitigation Measure 6.6-1) associated with project construction would still be required. Any potential land disturbance would require compliance with Mitigation Measures 6.3-1 and 6.3-2 to ensure impacts to any unknown cultural resources are less than significant. Mitigation Measures 6.5-1 and 6.8-1 would still be required to mitigate any contribution to the City's CSS. (DEIR, p. 8-17.)

Significant and Unavoidable Impacts That Would No Longer Occur

It is assumed that project construction could contribute to an increase in NO_x and construction noise resulting in short-term significant and unavoidable impacts. Development of this alternative would not generate more than 500 tons per year of solid waste, nor is it estimated that project operation would contribute to an increase in criteria pollutants resulting in both a project-specific and cumulative significant and unavoidable impact. Therefore, under this alternative only two of the five significant and unavoidable impacts would occur. (DEIR, p. 8-18.)

Relationship of the SMCS No Project Alternative to the Project Objectives

The SMCS No Project Alternative would not meet any of the project objectives identified by SMCS. The SMCS No Project Alternative would not consolidate healthcare facilities, would not expand specialty care services, or provide a new women's and children's center. Therefore, this alternative would be considered infeasible because it would fail to meet any of the identified project objectives. (DEIR, p. 8-18.)

Smaller SMF Building Alternative

Description

Under this alternative, approximately 63,400 +/- sf of Specialty Care medical office uses proposed in the SMF Building would not be constructed thereby reducing the size of the SMF

Building. All of the other components of the SMCS Project would not change. The WCC, Housing, Future MOB, Energy Center, and Community Parking Structure as well as the Children's Theatre of California would all be constructed. Under this alternative, the amount of useable medical office space within the SMF Building would be reduced from 131,737 sf to 68,371 sf. Two levels of parking would be provided below-grade with two levels of medical office space located above grade. The building design would not change with the exception of a smaller structure. A total of 90 parking spaces and the Energy Center would still be included below-grade. Due to the reduction in medical office space, the demand for parking would be reduced by approximately 224 spaces. (DEIR, p. 8-18.)

Under the SMCS Project, the medical office uses to be re-located in the SMF Building would come from medical offices currently located in the Fort Sutter and Alhambra medical buildings, as well as from SMH. By reducing the SMF Building by approximately 63,400 +/- sf of specialty care medical office space, the uses proposed to be re-located would remain where they are currently located. In essence, there would be no change relative to existing conditions for these components of the project. (DEIR, p. 8-18.)

Comparative Environmental Effects

Under the Smaller SMF Building Alternative approximately 63,400 sf of Specialty Care services would not be constructed. The specialty care medical office uses proposed in the SMF Building would not relocate from either the Fort Sutter or Alhambra medical office buildings; therefore, those medical office uses in SMH proposed to relocate into the vacant space to be created in the Fort Sutter Building and the Alhambra medical office building would not occur. Those medical uses would stay where they are currently located. The reduction of approximately 63,400 sf of medical space and the need for 224 fewer parking spaces would still however, result in the need to construct the 1,100 space Community Parking Structure. The reduction of 63,400 sf of building space would enable a smaller SMF Building to be constructed by two floors; however, the change in visual character would remain a less-than-significant impact the same as the SMCS Project. Construction of a smaller building on this site would fit into the urban environment essentially the same as a four story structure. Because the surrounding buildings vary in size from two stories to over six stories a two or a four story structure would be consistent with the surrounding buildings. (DEIR. p. 8-19.)

Under this alternative, the amount of construction activity would be similar to what was analyzed under the SMCS Project. However, because the SMF Building would be smaller it is assumed impacts associated with an increase in air pollutants and noise associated with project construction would be similar to what was analyzed for the project; although, slightly less severe, as shown in Table 8-4. Impacts to cultural resources would essentially be the same as the SMCS Project because the same area would be disturbed and/or excavated. The same would be true for hazards and public safety. Because the number of buildings to be demolished would not change under this alternative, the impacts would be the same as what was analyzed for the SMCS Project. The same is true for the increase in stormwater flows and potential impacts to the City's CSS. The reduction in size of the SMF Building would result in the same impacts to hydrology and water quality as analyzed under the SMCS Project. Because the SMF Building would be smaller there would be a reduction in the number of vehicle trips accessing the project area. This alternative would generate 157 fewer a.m. peak hour trips and 236 fewer p.m. peak hour trips. The impacts on intersections and freeways would also be less than significant, the same as the project. Due the reduction in building size, fewer parking spaces would be required. A total of approximately 224 fewer spaces would be needed. However,

even with this reduction in parking demand, there still could be a parking deficit of approximately 313 spaces for the project and 373 spaces for Trinity Cathedral and the Children's Theatre combined that would require mitigation. There would be no adverse impacts to bicycle, transit or pedestrian facilities, the same as the project. (DEIR, p. 8-19.)

The amount of water required for the project would be similar under this alternative as what was analyzed under the SMCS Project, shown in Table 8-4. Due to the reduction in size of the SMF Building the total demand for water would be slightly less. The same is true for the increase in wastewater, as shown in Table 8-4. Overall, the amount of wastewater generated by the Smaller SMF Building alternative would be very similar to the SMCS Project, but slightly less severe. The amount of solid waste generated by this alternative would be very similar to the SMCS Project and would trigger the 500 pound threshold of significance, as shown in Table 8-4 (DEIR, p. 8-19.)

Mitigation That Would No Longer Be Required

All of the mitigation measures identified under the SMCS Project would also still be required for this alternative because essentially the same project would be constructed in the same location as what was analyzed under the SMCS Project. Even though the project is slightly smaller, it would still require excavation that would disturb the soil and could impact unknown cultural resources; generate air pollutants and noise associated with project construction and building demolition; and generate an increase in parking demand. (DEIR, p. 8-20.)

Significant and Unavoidable Impacts That Would No Longer Occur

It is anticipated that the same significant and unavoidable impacts associated with project construction activities and the increase in solid waste identified under the SMCS Project would still occur under the Smaller SMF Building Alternative. The significant and unavoidable cumulative impacts also would occur. (DEIR, p. 8-20.)

Relationship of the Smaller SMF Building Alternative to the Project Objectives

The Smaller SMF Building Alternative would fail to achieve the project applicant's primary project objective of consolidating all acute care facilities at SMH and SGH, as well as other disparate facilities into one health complex. By reducing the size of the SMF Building some of the medical office uses to be re-located in the SMF Building from medical offices currently located in the Fort Sutter and Alhambra medical buildings, as well as from SMH would not occur. The uses proposed to be relocated would remain where they are currently located. In essence, there would be no change relative to existing conditions for these components of the project. Not allowing these medical office uses to be relocated from SMH, and the Fort Sutter and Alhambra medical office buildings would not meet the primary objective of consolidating disparate health care functions into one complex. Therefore, the Smaller SMF Alternative fails to meet SMCS's most important objective for the project. (DEIR, p. 8-20.)

SMCS Reduced Size Alternative

Description

Under the SMCS Reduced Size Alternative, the WCC, Energy Center, Housing, and Community Parking Structure as well as the Children's Theatre of California would be constructed as currently proposed; however, the SMF Building and the Future MOB (St. Luke's MOB) would not be constructed. Under this alternative, the existing St. Luke's MOB would remain and would not be occupied and the entire SMF Building would not be constructed. The other existing uses on the site would remain. The elimination of the SMF Building and the Future MOB would reduce parking demand by approximately 540 spaces; therefore, the Community Parking Structure would be reduced to six floors above grade with one floor below grade. A total of approximately 417 spaces would no longer be required for the SMF Building and 124 spaces would no longer be required for the Future MOB. (DEIR, p. 8-20.)

As discussed in the Smaller SMF Building Alternative, the medical offices proposed to re-locate to the SMF Building under the SMCS Project would come from the Fort Sutter and Alhambra medical buildings, as well as from SMH. Not constructing the SMF Building or the Future MOB would therefore eliminate the relocation of any medical office uses to the SMCS medical complex. All of the medical uses would remain where they are currently and there would be no change relative to existing conditions. (DEIR, p. 8-20.)

Comparative Environmental Effects

Under the Reduced Size Alternative, all of the components of the project would be constructed with the exception of the SMF Building and the Future MOB. A total of approximately 540 parking spaces would no longer be required and the Community Parking Structure would be a total of six stories above grade versus seven stories. The visual impacts of the project would essentially be the same as what was analyzed for the SMCS Project. The change in visual character would remain less than significant. Impacts caused by construction activities, including an increase in air pollutants and noise from construction equipment, would essentially be the same as the SMCS Project; however, slightly less severe because two buildings would not be constructed and some buildings would not be demolished. Table 8-5 indicates emissions associated with project construction attributed to the Reduced Size Alternative prior to mitigation. Under the Reduced Size Alternative there would be no impacts associated with project construction. Impacts due to project excavation and land disturbance which include impacts to cultural resources would be similar to those presented for the SMCS Project because for all practical purposes a majority of the site would be developed. (DEIR, p. 8-21.)

Under the Reduced Size Alternative, impacts associated with building demolition activities and the potential for hazards to be present on the site would still occur because a number of buildings would be demolished under this alternative. In addition, because the WCC would be constructed it is assumed helicopter operations would still continue contributing to an increase in noise associated with helicopter operations. Impacts to hydrology and water quality would also be very similar to the SMCS Project. Although two buildings would not be constructed the overall amount of impervious surface area would not change much relative to existing

conditions. The total amount of stormwater runoff would be very similar to what was analyzed under the SMCS Project. The potential for the project to exceed or adversely impact the City's CSS would be similar to the SMCS Project, as shown in Table 8-5. The amount of water and wastewater generated under this alternative would be less than the project. (DEIR, p. 8-21.)

Under this alternative there would be a reduction in vehicle trips which would generate 363 fewer peak hour a.m. trips and 521 fewer p.m. peak hour trips. Similar, to the project impacts to intersections and freeway segments would be less than significant. In addition, a total of approximately 540 parking spaces would no longer be required. This would enable a reduction in size of the Community Parking Structure to six stories above grade. The parking demand associated with this alternative would be accommodated by the parking provided by the project. There would be a parking shortfall of approximately 146 spaces associated with Trinity Cathedral and the Children's Theatre. Based on the proposed and available parking it is assumed there still could be a deficit in available on-site parking to meet the parking demand of this alternative. Impacts to pedestrian, bicycle and transit systems would remain less than significant, the same as the project. (DEIR, pp. 8-21 – 8-22.)

Mitigation That Would No Longer Be Required

Under the Reduced Size Alternative, all of the mitigation measures identified under the SMCS Project would still be required because essentially the entire project area would be developed. Overall, the severity of the impacts identified would be less than the project because a smaller project would be constructed. However, there still could be a parking shortfall under this alternative that would need to be mitigated. (DEIR, p. 8-22.)

Significant and Unavoidable Impacts That Would No Longer Occur

Under the Reduced Size Alternative, all of the project-specific and cumulative significant and unavoidable impacts identified for the SMCS Project associated with project construction and operation would still occur. (DEIR, p. 8-22.)

Relationship of the SMCS Reduced Size Alternative to the Project Objectives

The SMCS Reduced Size Alternative, similar to the Smaller SMF Building Alternative would fail to achieve the project applicant's primary project objective of consolidating all acute care facilities from SMH and SGH, as well as other disparate facilities, into one medical complex. By eliminating the SMF Building and the Future MOB, the medical office uses to be relocated into the SMF Building would not occur. The uses proposed to be relocated would remain where they are currently located in either the Fort Sutter or Alhambra medical office buildings or SMH. If these medical office uses are not relocated this alternative would not meet the primary objective of consolidating all health care functions into one complex. Therefore, the SMCS Reduced Size Alternative fails to meet the project applicant's most important objective for the project. (DEIR, p. 8-22.) The alternative also fails to avoid or substantially reduce most of the significant and unavoidable impacts that would result from the project, and a reduced site project could not justify or support the substantial cost needed to provide the necessary infrastructure for the project.

SMCS Full Parking Supply Alternative

Under the SMCS Full Parking Supply Alternative, the Community Parking Structure would be redesigned to accommodate the maximum calculated midday parking demand associated with the SMCS Project, Trinity Cathedral Project, and the future Children's Theatre. As discussed in the Transportation section, Section 6.7, the parking shortfall estimated for the SMCS Project is approximately 537 spaces, combined with the parking needs of Trinity Cathedral (25 midday spaces) the parking shortfall increases to 562 spaces, adding the Children's Theatre the full midday parking demand shortfall increases to 686 spaces. Under this alternative the Community Parking Structure would be expanded and redesigned to accommodate up to approximately 1,685 spaces in a ten-story above-grade structure. The redesign could necessitate removal of the proposed 9,000 sf of retail uses proposed along N Street because a larger building floor plate may be required to accommodate a taller structure. A 1,685 space structure assumes approximately 85 percent occupancy. This alternative also does not assume the project would include the additional TSM/Parking Demand Management Program Elements. This alternative does assume compliance with the City-required TSM Plan, but the additional program elements would not be required. Under this alternative other components of the SMCS Project would not change, the only component that would change would be the expansion and redesign of the parking structure. (DEIR, p. 8-23.)

Comparative Environmental Effects

Under the SMCS Full Parking Supply Alternative, all of the project components would be constructed with the exception of the expanded and redesigned Community Parking Structure. The parking structure would be one story below-grade and ten stories above- grade to accommodate a total of approximately 1,685 parking spaces; this would be an increase of three stories compared to the current design of one story below-grade with seven stories above-grade. All of the impacts addressed in Chapter 6 associated with the other project components including construction and operation (i.e., SMF Building, WCC, housing, etc) would not change under this alternative. The reader is referred to Chapter 6 for a full discussion of impacts associated with other project components. (DEIR, p. 8-23.)

Under this alternative, the increased height and mass of the expanded and redesigned parking Community Parking Structure would be out-of-scale with the adjacent structures and surrounding neighborhood. The expanded building would cast shadows on adjacent sidewalks, storefronts and other uses for longer periods of time that the SMCS Project. Although there are other noticeably tall buildings in the vicinity including the seven-story Buhler Building, five-story Sutter General Hospital, and the seven-story senior apartment building on Capitol Avenue, because the buildings immediately adjacent to the project site primarily include one and two-story structures a ten-story structure would appear to be out-of-scale with the adjacent uses. However, in the central business district/midtown area the City uses a different threshold to determine the significance of visual impacts and may not find the presence of a ten-story building an aesthetic impact. (DEIR, p. 8-23.)

Increasing the amount of parking in the Community Parking Structure would tend to concentrate of traffic flow in and around the parking structure, increasing the potential for congestion and other related impacts. However, the analysis of traffic, included in Section 6.7, assumed adequate parking was available to serve the project assuming compliance with the TSM Monitoring Program; therefore, under this alternative constructing a larger structure to

accommodate the potential parking shortfall should not change the results of the traffic analysis. Traffic volumes under this alternative would not be reduced compared to the SMCS Project. However, the total amount of available parking would be increased under this alternative. (DEIR, p. 8-23.)

The maximum practical height of a parking garage is normally seven or eight levels. A taller structure results in increased vehicle circulation on the lower levels as people are looking for spaces in the lower floors. A taller structure could be designed with express ramps that lead vehicles up to the higher floors without having to circulate through all the lower floors. However, this design would require a larger building footprint to construct and may not be feasible in the current location. An increase in vehicles circulating around the structure could contribute to an increase in localized air pollutants as a result of more vehicles queuing to enter or exit the structure or circulating on streets in the vicinity of the parking structure. In addition, construction of a taller parking structure would contribute more air emissions of ROG and NO_x associated with a longer construction schedule. In addition, the concentration of vehicles in this area could also contribute to an increase in traffic noise and an increase in pedestrian/bicycle and vehicle conflicts and other safety issues. (DEIR, p. 8-23.)

Mitigation that Would No Longer Be Required

Under the SMCS Full Parking Supply Alternative, since all of the other project components are remaining unchanged, the same mitigation measures identified under the SMCS Project would still be required under this alternative. All of the mitigation measures identified under the SMCS Project would be required with the exception of mitigation identified to address the parking shortfall (Mitigation Measure 6.7-1). (DEIR, p. 8-24.)

It is conceivable that additional mitigation could be required to address potential impacts associated with an increase in vehicles in the area and pedestrian/bicycle and vehicle conflicts (DEIR, p. 8-24.)

Significant and Unavoidable Impacts that Would No Longer Occur

Under the SMCS Full Parking Supply Alternative the only significant and unavoidable impact that would no longer occur would be the potentially significant and unavoidable impact identified for the parking shortfall. Because this alternative meets the parking demand associated with the project the impact would be less than significant. (DEIR, p. 8-24.)

It is not anticipated that this alternative would create any new significant and unavoidable impacts. (DEIR, p. 8-24.)

Relationship of the SMCS Full Parking Supply Alternative to the Project Objectives

The SMCS Full Parking Supply Alternative is similar to the SMCS Project and would essentially not change the primary SMCS Project components. However, this alternative would fail to achieve all of the project applicant's project objectives by not designing a project that is environmentally sensitive and includes an aggressive TSM program, and places the most intense project uses away from residential areas. In addition, this alternative would not fully

meet the intent of the second objective which states a desire to design a project that complements the residential aspect of the surrounding neighborhood. Therefore, the SMCS Full Parking Supply Alternative fails to meet a majority of the project objectives and is therefore infeasible. (DEIR, p. 8-24.)

Section 15126.6(f)(1) of the CEQA Guidelines defines feasible as taking into account "site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries". In the spirit of full disclosure this alternative was presented in the EIR to address the parking shortfall identified. However, the question of is this alternative even deemed feasible is raised due to 1) affordability and 2) technical feasibility. SMCS has indicated that to construct a parking structure of this size would not be economically viable for the project. In addition, the technical feasibility of constructing a ten-story parking structure on this project site has not been determined. Therefore, at this time it is not known if this project alternative would even be considered a feasible alternative; however, it was presented in the spirit of full disclosure. (DEIR, p. 8-24.)

SMCS Off-Site Alternative

Under the SMCS Off-Site Alternative, the WCC, SMF Building and SGH would be constructed on an approximately 40-acre parcel of land located in North Natomas at the intersection of Arena Boulevard and East Commerce Way, east of I-5, as shown in Figure 8-6. The parcel is currently zoned EC 50, which would allow a hospital use. Under this alternative, the Housing, Future MOB and Community Parking Structure, as well as the Children's Theater of California would not be project components. However, if a new medical complex were to be constructed in a different location the existing SGH facility located in midtown Sacramento as well as SMH would be closed and a new hospital building constructed along with the WCC and the SMF Building in this new location. It would not be practical to maintain SGH in its current location; therefore, SGH would be closed and the building more than likely sold. This new medical complex would include a combination of surface and structured parking and it is anticipated a new Energy Center would also be constructed to serve the buildings. (DEIR, p. 8-25.)

This alternative assumes an approximately 400,000 sf new hospital would be constructed along with an approximately 398,000 sf WCC (including a helistop) and a 150,000 sf medical office building at this new location. An approximately 24,000 sf Energy Center would also be constructed to provide the heating and cooling needs of the new complex. It is assumed parking would be provided in a mix of surface parking and parking structures. (DEIR, p. 8-25.)

The project site is currently undeveloped and does not contain any buildings or structures. The site has previously been used for agricultural operations. No paved roads exist on the site. (DEIR, p. 8-25.)

<u>Comparative Environmental Effects</u>

Under the SMCS Off-Site Alternative it is assumed Sutter would construct a new medical complex in North Natomas on a 40-acre parcel of land. Three new buildings would be constructed as well as any required parking structures. Development of the project in this location would result in the creation of new impacts associated with development of raw land versus development in a developed, urban environment. The project site is located within the

North Natomas Community Plan area and is therefore subject to compliance with the Natomas Basin Habitat Conservation Plan (NBHCP). The land is currently designated by the State Farmland Mapping and Monitoring Program as a combination of Farmland of Local Importance and other lands. The introduction of development on this parcel would change the visual character of the area relative to existing conditions. However, this portion of the city is planned and zoned for development and is adjacent to existing development to the north, east and west. It is not anticipated that development of this site would contribute to any significant visual impacts. The site would be visible to motorists along I-5 so there could be impacts associated with light and glare that would need to be mitigated. Project construction would contribute to an increase in air emissions associated with grading activities and construction equipment. It is anticipated that PM_{10} associated with grading activities would be increased compared to the SMCS Project because a much larger site is being disturbed in an undeveloped area. In addition, no paved roads currently exist on the site so it is assumed additional dust would be created due to construction equipment accessing the site. As with the project it is assumed emissions associated with the increase in NO_x attributed to construction equipment could be reduced to less-than-significant levels through mitigation. Operational emissions associated with project operation are assumed to be very similar to what was analyzed as part of the SMCS Project, as shown in Table 8-6. Construction noise would be a short-term effect of the project yet due to its location it is not anticipated to disturb any sensitive receptors. The closest residential areas are located approximately 1,800 feet to the southwest across I-5. Because an undeveloped site would be disturbed it is assumed there could be adverse impacts to any known or unknown subsurface resources that may exist on the site, the same as the SMCS Project. No surface historic resources exist; therefore, this would not be an issue in this location. It is assumed the impact to any subsurface resources would be the same as the project. (DEIR, pp. 8-25 – 8-26.)

The potential for the project in this location to contribute to impacts associated with the transport, handling or storage of hazardous materials is considered the same as what was analyzed under the SMCS Project. However, because the project site is undeveloped a Phase 1 environmental site assessment (ESA) would need to be prepared to analyze any potential hazards that may be present on the site. The new hospital and medical office buildings would be required to comply with stringent federal and state requirements pertaining to the proposed handling, storage and disposal of any hazardous materials. In addition, because no buildings would need to be demolished there would not be any potential safety impacts to construction workers or the public. The WCC would also include a helistop, the same as the project, which would result in an increase in noise associated with helicopter operations. However, because the site is located adjacent to I-5 and not in close proximity to any residences it is not assumed that helicopter noise would create any significant, unmitigable impacts. The project site is not located within a floodplain, however, because it is located in an undeveloped area in the city existing storm drain, water and sewer infrastructure as well as roadways do not exist. Therefore, the project would require construction of on-site storm drain, water and sewer facilities as well as roads to accommodate the project. It is assumed the project would tie into the City's existing storm drain, water and sewer infrastructure located to the east of the project site in the newly developed area. There would be no impacts to the City's CSS because this site is not served by a combined system. However, there could be impacts associated with increased runoff and stormwater flows because a majority of the project site would be developed with impervious surface area. There is the potential that existing utility infrastructure would not be adequate to serve the demand of the project and would need to be replaced. However, that is not likely because the site is located in a portion of the City that has been planned for future development including sizing of necessary infrastructure. (DEIR, p. 8-27.)

As mentioned above, the project site is undeveloped and does not contain any roads or utility infrastructure. Access to the project site would be via the existing off-ramp from I-5 into Arena Boulevard. Access to the site could be via Arena Boulevard or East Commerce Way. It is assumed a similar number of vehicle trips would be generated under this alternative. Although the specific number of trips would depend on the mode choices made by employees, patients, and visitors to the site. It is assumed the additional traffic associated with the project would contribute a number of new trips along this section of I-5 and along Arena Boulevard. This could contribute to additional impacts to the freeway and some of the surrounding streets and intersections. This area is newly developing and not much development exists in the area currently; therefore, it is assumed the increase in trips would not result in any significant and unavoidable impacts. However, without quantified data it is difficult to assess the extent of the impacts. Under this alternative it is assumed adequate parking could be provided to meet the needs of the hospital and medical office buildings through a combination of surface and structured parking. However, because this site is not as centrally located and near transit facilities it is assumed fewer people would have the ability to use alternate transportation modes and that more single occupant vehicle trips would generated compared to the SMCS Project. (DEIR, pp. 8-27 – 8-28.)

Mitigation That Would No Longer Be Required

Under this alternative a majority of the mitigation identified for the project would still be required for this alternative. However, since this area is not located within the City's CSS there would be no impacts to the CSS. In addition, since no buildings would need to be demolished, mitigation measures identified in the hazards section would no longer be required. The same mitigation measures identified for air quality and noise associated with project construction and operation would still be required. It is assumed any mitigation required for parking would not be required under this alternative because adequate surface and structure parking would be provided to meet the needs of the hospital and medical office space. (DEIR, p. 8-28.)

Significant and Unavoidable Impacts That Would No Longer Occur

The project-specific and cumulative impacts identified under the SMCS Project would be the same for this alternative. The short-term project-specific impact identified for the Children's Theatre associated with construction noise would not occur under this alternative because the Children's Theatre would not be constructed in this location. (DEIR, p. 8-28.)

Relationship of the SMCS Off-Site Alternative to the Project Objectives

Although the SMCS Off-Site Alternative would meet some of the project objectives because it would consolidate functions, it would not consolidate functions in a central location that would complement the midtown neighborhood. Relocation of the SMCS facilities to the Natomas area would eliminate the opportunity for the creation of compatible uses that would complement the cultural, business, residential, historic, and religious aspects of the surrounding neighborhood. In addition, by locating the medical complex in North Natomas there is no opportunity to create a unique partnership with the Children's Theatre of California to benefit patients and the community. Further, relocation of the SMCS facilities would substantially reduce the

opportunities for increased use of alternative modes of transportation due to the presence of fewer transit and transportation options and increased distance from the center of the region. Therefore, although this alternative could meet some of the project applicant's internal programmatic objectives, it fails to meet all of the objectives; specifically, the primary objective of consolidating uses in a way to complement and support the midtown neighborhood. (DEIR, p. 8-28.)

SMCS Environmentally Superior Alternative

An EIR is required to identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. Section 15126.6(e) of the CEQA Guidelines requires that an environmentally superior alternative be designated and states that "if the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives."

For the SMCS Project the environmentally superior alternative would be the No Project/No Action Alternative due to the limited environmental impacts associated with this alternative. However, the SMCS No Project/No Action Alternative does not achieve any of the project's objectives. A SMCS No Project/No Action Alternative could be designed such that it reduces most of the unavoidable impacts of the project (except construction noise). According to the CEQA Guidelines, if the No Project alternative is the environmentally superior alternative the EIR shall also identify another environmentally superior alternative.

The SMCS Reduced Size Alternative would be considered the next viable environmentally superior alternative because a majority of the impacts identified for the project could be avoided or substantially reduced because a smaller project would be developed. This alternative, however, does not meet the primary project objective of consolidating all health care functions into one complex. Nevertheless, the SMCS Reduced Size Alternative would be considered the environmentally superior project alternative. (DEIR, p. 8-29.) Although environmentally superior, this alternative fails to avoid or reduce most of the significant and unavoidable impacts that would result from the project, and a reduced size project could not justify or support the substantial cost needed to provide the necessary infrastructure for the project.

X. STATEMENT OF OVERRIDING CONSIDERATIONS

As set forth in the preceding sections, the City's approval of the SMCS Project will result in significant adverse environmental impacts that cannot be avoided even with the adoption of all feasible mitigation measures. Despite the occurrence of these impacts, however, the City chooses to approve the Project, as mitigated, because, in its view, the economic, social, and other benefits that the Project will produce will render the significant effects acceptable.

The following statement identifies why, in the City's judgment, the benefits of the Project as approved outweigh its unavoidable significant effects. Any one of these reasons is sufficient to justify approval of the Project. Thus, even if a court were to conclude that not every reason is supported by substantial evidence, the City would stand by its determination that each individual reason is sufficient. The substantial evidence supporting the various benefits can be found in the preceding findings, which are incorporated by reference into this section, and into the documents found in the Record of Proceedings, as defined above.

The City finds that each impact previously identified and briefly explained above is acceptable because mitigation measures have been required to reduce these impacts to the extent feasible, and on balancing the benefits to be realized by approval of the Project against the remaining environmental risks, the following economic, social, and other considerations outweigh the impacts and support approval of the Project:

First, the Project would provide new and expanded medical health services, technologies, and buildings to increase capacity for quality specialized care.

The Project is planned as an accessible and innovative healing arts facility for the citizens of Sacramento, as well as the region, within an urban setting. (DEIR, pp. 2-1; 2-5.) The SMCS project recognizes that the region's growing population will require specialized and accessible health facilities. (DEIR, p. 2-5.) As such, the Project would consolidate all acute care facilities run by SMCS into a single, fully integrated medical complex, offering the latest treatment in adult care and enhance a growing array of leading medical procedures. The consolidation of the acute care facilities into one health care complex will provide efficient, cost-effective delivery of health care treatment. (DEIR, pp. 2-1 and 2-9.)]

Moreover, the Project will comply with the requirements set forth in California law (SB 1953), which seeks to ensure the highest level of structural safety for hospital buildings. (DEIR, p. 2-10.)

Second, the Project would provide housing.

The adoption and implementation of the SMCS Project will provide for the development of 32 new residential units and approximately 40 parking spaces. (DEIR, p. 2-33.) By providing a mix of housing, medical, and commercial opportunities adjacent to the City's core, the Project helps limit potential sprawl and enriches the downtown environment.

Third, the Project would provide a mixed-use community, including medical, retail, and housing.

The Project is envisioned as the hub of an "urban village" in Midtown's Sutter District. The SMCS Project would promote community involvement and neighborhood-building by including a community theatre, housing, and neighborhood-serving retail. (DEIR, p. 2-9.) The Project is designed to complement neighborhood features, including places of worship, historic and cultural sites, a new live theatre, residential development and commercial activity, including restaurants, retail and office uses. (DEIR, p. 2-5.)

Fourth, the Project would provide new jobs.

Development of the WCC and the SMF Building would increase economic activity in Midtown Sacramento. (DEIR, p. 2-49.)

The Project is also expected to create a number of secondary jobs, as implementation of the Project will require a large number of construction jobs for the development and modification of buildings, housing, commercial structures, and associated infrastructure (ie., roads, water and sewer lines). Such jobs will provide income and work experience for City residents and other workers and their families.

Fifth, the Project would provide fiscal benefits from taxes generated by the commercial portions related to the project.

The creation of temporary construction jobs and permanent jobs will create a financial benefit to the City, along with the increase in property taxes and local sales tax from the purchase of goods and services within the community.

The Project will also generate other revenues to the City through the payment of development impact fees. These monies will benefit the City and other governmental agencies, and their residents and constituencies, by providing needed revenue for the provision of required services and amenities. Further, the SMCS Project will enable SMCS to remain a part of the midtown community, and will thus contribute to the ongoing economic revitalization of the area.

Sixth, the Project would provide additional parking and pedestrian access.

The SMCS Project would provide a Community Parking Structure that would provide parking for staff and patients of the new medical center complex, restaurant patrons, retail customers, and future patrons of the theatre facilities, as well as other businesses in the neighborhood and persons attending neighborhood churches or nearby cultural attractions. (DEIR, pp. 2-2-10.) Moreover, the SMCS Project would increase the overall parking supply by 890 off-street spaces, from 1,847 off-street spaces to 2,792 off-street spaces. (DEIR, p. 6.7-26; FEIR, p. 2-4.) To reduce any potential for a future parking shortfall, the Project includes a Parking Management Program and TSM to ensure that parking supply is available to meet parking demands of the project. (DEIR, pp. 2-46 – 2-49.) Additionally, the Community Parking Structure is the first project component to be constructed, which would ensure adequate parking is available as the new uses are developed. (DEIR, p. 6.7-47.)

The Project would provide a Spanning Structure to connect the WCC to the SGH to allow the two separate buildings to function as a single integrated hospital. Additionally, a short pedestrian bridge would connect the existing Buhler Building with the WCC. (DEIR, p. 2-21 - 2-22.)

Additionally, the streetscape within the SMCS Project area will be enhanced. Streetscape features could include decorative paving, landscaping, and lighting upgrades, as well as improved way-finding signage and circulation assistance. Pedestrian street level circulation and other improvements are also proposed. (DEIR, p. 2-40.)

Seventh, the Project would be consistent with the City's General Plan Policies and the Sacramento Central City Community Plan ("CCCP").

As part of this Project, the General Plan would be amended to modify existing land use designations from Regional Commercial Office ("RCO") to Public/Quasi Public Miscellaneous ("PQPM" and High Density Residential ("HDR") to Community Neighborhood Commercial and Office ("CNCO") to support a balanced system of quality medical facilities, consistent with the goals and policies of the General Plan ("General Plan Goal A") (DEIR, pp. 4-22 - 4-23.)

The Project would also be consistent with the CCCP. As part of this Project, the CCCP would be amended to change Residential/Office ("RO") and Multi-Family Residential ("MF") to General Commercial ("GC") to be consistent with surrounding land uses. (DEIR, p. 4-23.)

Eighth, the Project would provide traffic improvements.

The SMCS Project would complement the existing neighborhood and environment by providing road and intersection improvements to reduce traffic in the surrounding neighborhood and enhance pedestrian safety alongside new housing, retail and cultural amenities to the extent feasible. (DEIR, p. 2-10.)

The Project area is proximate to a light rail station, and thus promotes the use of public transit. The nearest light rail station is the 29th Street Station, located about four blocks south of the Project area. Additionally, a shuttle service is operated by SMCS between Sutter General Hospital and the station for employees, staff, and the general public. (DEIR, pp. 6.7-24; 2-43.)

Ninth, the Project would provide a WCC.

The WCC would feature the highest level of intensive care and maternal and children's health services as well as a life-saving "helistop" atop the hospital building to serve critically sick patients from across Northern California. (DEIR, pp. 2-9 and 2-16.)

Tenth, the Project envisions a live Children's Theatre to Give Hope and Enjoyment to all Children, including those frequenting the SMCS due to Illness.

The Project's theatre component envisions the future development of the Children's Theatre of California/B Street Theatre within the Project area. The Children's Theatre envisions two separate theatres with a total of 565 seats, putting on a total of 11 plays per year. (DEIR, p. 2-51.) Such new live theatre would be designed to complement neighborhood features and contribute to the overall holistic urban community core.

XI. MITIGATION AND MONITORING PLAN

A Mitigation and Monitoring Plan ("MMP") was prepared for the Project and approved by the City by the same resolution that has adopted these findings. (See Pub. Resources Code, § 21081.6, subd. (a)(1); CEQA Guidelines, § 15097.) The City will use the MMP to track compliance with Project mitigation measures. The MMP is included in the Final EIR and will remain available for public review during the compliance period.

Table of Contents:

Exhibit A: Mitigation Monitoring Plan- 23 pages

Adopted by the City of Sacramento City Council on December 6, 2005 by the following vote: