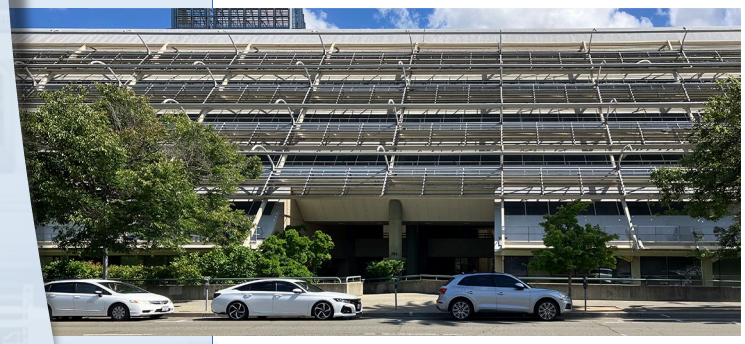






Draft Environmental Impact Report for the

Capitol Mall Office Buildings Demolition Project

State Clearinghouse No. 2026030128

Prepared for:

DGS GENERAL SERVICES

California Department of General Services

October 2026

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LIST OF ABBREVIATIONS

°C	degrees Celsius
°F	degrees Fahrenheit
2020 MTP/SCS	2020 Metropolitan Transportation Plan/Sustainable Communities Strategy
2022 SIP	2022 State SIP Strategy
2040 General Plan	City of Sacramento 2040 General Plan
AB	Assembly Bill
ACC	Advanced Clean Cars
ADA	Americans with Disabilities Act
AERMOD	American Meteorological Society/Environmental Protection Agency Regulatory Model Improvement Committee modeling system
af	acre-feet
AFV	alternative fuel vehicle
afy	acre-feet per year
BAAD	Bay Area Air District
BACT	best available control technology
BMP	best management practice
CA SDWA	California Safe Drinking Water Act
CAA	Clean Air Act
CAAP	Climate Action & Adaptation Plan
CAAQS	California Ambient Air Quality Standards
CADA	Capitol Area Development Authority
CAFE	Corporate Average Fuel Economy
Cal/OSHA	California Occupational Safety and Health Administration
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standards Code
Caltrans	California Department of Transportation
CAP	climate action plan
CARB	California Air Resources Board
CBC	California Building Code
CBD	Central Business District
CCAA	California Clean Air Act
CCSP	Central City Specific Plan
CCR	California Code of Regulations
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CEQA Guide	Guide to Air Quality Assessment in Sacramento County
CESA	California Endangered Species Act
CFMP	comprehensive flood management plan

CFR	Code of Federal Regulations
cfs	cubic feet per second
CH_4	methane
CHL	California Historical Landmark
CHRIS	California Historical Resources Information System
CMP	Coordinated Monitoring Program
CNDDB	California Natural Diversity Database
CNEL	community noise equivalent level
CNPS	California Native Plant Society
CO	carbon monoxide
CPUC	California Public Utilities Commission
CRA	Congressional Review Act
CRHR	California Register of Historical Resources
CRPR	California Rare Plant Rank
CSCGMP	Central Sacramento County Groundwater Management Plan
CSO	Combined Sewer Overflow
CSS	Combined Sewer System
CSSIP	combined sewer system improvement plan
CSU	California State University
CTMP	construction traffic control plan
CWA	Clean Water Act
CWTP	Combined Wastewater Treatment Plant
cy	cubic yard
dB	decibel
dBA	A-weighted decibel
DDT	dichlorodiphenyltrichloroethane
Delta	Sacramento River–San Joaquin River Delta
DGS	California Department of General Services
DOT	US Department of Transportation
DPM	diesel particulate matter
DPR	Department of Parks and Recreation
Draft EIR	draft environmental impact report
DSH	diameter at standard height
DTSC	California Department of Toxic Substances Control
DWR	California Department of Water Resources
EAFWTP	E.A. Fairbairn Water Treatment Plant
EchoWater Facility	Sacramento Regional Wastewater Treatment Plant
EDD	Employment Development Department
EO	Executive Order
EOP	emergency operations plan
EPA	US Environmental Protection Agency
EPCA	Energy Policy and Conservation Act

EPCRA	Emergency Planning and Community Right-to-Know Act of 1986
ESA	Endangered Species Act
ETMP	event transportation management
EV	electric vehicle
FAR	floor area ratio
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Map
FTA	Federal Transit Administration
GHG	greenhouse gas
GLC	ground-level concentration
GSF	gross square feet
GSP	groundwater sustainability plan
GWh	gigawatt hour
HABS	historic American buildings survey
HAP	hazardous air pollutant
HCD	California Department of Housing and Community Development
HDPUV	heavy-duty pickup truck and van
HRA	health risk assessment
Hz	hertz
ICT	Innovative Clean Transit
IEPR	Integrated Energy Policy Report
in/sec	inches per second
IPaC	Information for Planning and Consultation
IPCC	Intergovernmental Panel on Climate Change
Kv	kilovolt
lb/day	pounds per day
LBP	lead based paint
LCFS	Low Carbon Fuel Standard
LCI	Governor's Office of Land Use and Climate Innovation
L_{dn}	day-night level
L_{eq}	equivalent continuous sound level
LEHD	Longitudinal Employer-Household Dynamics
LHMP	Local Hazard Mitigation Plan
LID	Low Impact Development
L_{max}	maximum sound level
LOS	level of service
LTA	Local Transportation Analyses
LTCP	long-term control plan

MBTA	Migratory Bird Treaty Act
MCL	maximum contaminant level
mgd	million gallons per day
MLD	most likely descendant
$MMTCO_2e$	million metric tons of carbon dioxide equivalent
MOU	memorandum of understanding
MPO	metropolitan planning organization
mPa	micro-Pascal
mpg	miles per gallon
MPO	metropolitan planning organization
MS4	municipal separate storm sewer system
$MTCO_2e$	metric tons of carbon dioxide equivalent
$MTCO_2e$/year	metric tons of carbon dioxide equivalent per year
MTP/SCS	Metropolitan Transportation Plan/Sustainable Communities Strategy
MY	model year
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCCP	natural community conservation plan
NCIC	North Central Information Center
NEHRP	National Earthquake Hazards Reduction Program
NFIP	National Flood Insurance Program
NHTSA	National Highway Traffic Safety Administration
NMFS	National Marine Fisheries Service
NO_2	nitrogen dioxide
NOP	notice of preparation
NO_X	nitrogen oxides
NPDES General Permit	NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities
NPDES	National Pollutant Discharge Elimination System
NPPA	California Native Plant Protection Act
NRHP	National Register of Historic Places
OAL	Office of Administrative Law
OEHHA	Office of Environmental Health Hazard Assessment
OPR	Governor's Office of Planning and Research
OSHA	Occupational Safety and Health Administration
PCB	polychlorinated biphenyl
PG&E	Pacific Gas and Electric Company
PM	particulate matter
PM_{10}	respirable PM with an aerodynamic diameter of 10 micrometers or less
$PM_{2.5}$	fine PM with an aerodynamic diameter of 2.5 micrometers or less
Porter-Cologne Act	Porter-Cologne Water Quality Control Act of 1970

ppb	parts per billion
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
project	Capital Mall Office Buildings Demolition Project
PV	photovoltaic
RMS	root-mean-square
RPS	Renewables Portfolio Standard
RTP	regional transportation plan
RWQCB	regional water quality control board
SACOG	Sacramento Area Council of Governments
Sacramento State	California State University, Sacramento
SacRT	Sacramento Regional Transit District
SacSewer	Sacramento Area Sewer District
SAFCA	Sacramento Area Flood Control Agency
SAFE	Safer Affordable Fuel-Efficient
SARA Title III	Superfund Amendments and Reauthorization Act of 1986
SB	Senate Bill
SCEMD	County of Sacramento Environmental Management Department
SCGA	Sacramento Central Groundwater Authority
SCS	sustainable communities strategy
sf	square feet
SGMA	Sustainable Groundwater Management Act of 2014
SHPO	State Historic Preservation Officer
SIP	state implementation plan
SMAQMD CEQA Guide	*Guide to Air Quality Assessment in Sacramento County*
SMAQMD	Sacramento Metropolitan Air Quality Management District
SMUD	Sacramento Municipal Utility District
SNC	Sierra Nevada Conservancy
SO_2	sulfur dioxide
SORE	small off-road engine
SPCC	Spill Prevention, Control, and Countermeasure
SR	state route
SRWTP	Sacramento Regional Wastewater Treatment Plant
SSBMI	Shingle Springs Band of Miwok Indians
STAA	Surface Transportation Assistance Act
SVAB	Sacramento Valley Air Basin
SWPPP	stormwater pollution prevention plan
SWRCB	State Water Resources Control Board
SWRCB-DDW	State Water Resources Control Board Division of Drinking Water
TAC	toxic air contaminant

TDM	Transportation Demand Management
THPO	Tribal Historic Preservation Officer
TMDL	total maximum daily load
TPA	transit priority areas
tpy	tons per year
UAIC	United Auburn Indian Community
UBC	Uniform Building Code
University	California State University, Sacramento
US 50	Highway 50
USC	US Code
USFWS	US Fish and Wildlife Service
USGS	US Geological Survey
UST	underground storage tank
UWMP	urban water management plan
UWMPA	Urban Water Management Planning Act
VdB	vibration decibels
VMT	vehicle miles traveled
WDR	waste discharge requirement
WFA	Water Forum Agreement
WQO	Water Quality Objective
ZEV	zero-emission vehicle
ZNE	zero net energy
$\mu g/m^3$	micrograms per cubic meter

1 INTRODUCTION

This draft environmental impact report (Draft EIR) evaluates the environmental impacts of the proposed Capital Mall Office Buildings Demolition Project (project). This Draft EIR has been prepared under the direction of California Department of General Services (DGS) as the lead agency in accordance with the requirements of the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000 et seq.) and the State CEQA Guidelines. This chapter of the Draft EIR provides information on:

- the project requiring environmental analysis (synopsis);
- the type, purpose, and intended uses of the Draft EIR;
- the scope of this Draft EIR;
- the agency roles and responsibilities;
- the public review process;
- the organization of the Draft EIR; and
- the standard terminology.

1.1 PROJECT REQUIRING ENVIRONMENTAL ANALYSIS

This section presents a synopsis of the project characteristics. For further information on the proposed project, see Chapter 3, "Project Description." DGS is the lead agency responsible for preparation of an EIR for the project. The project involves demolition of three state-owned office buildings in downtown Sacramento located on Capitol Mall and N Street; the Employment Development Department (EDD) Headquarters at 800 Capitol Mall, the EDD "Solar Building" Annex at 751 N Street, and the State Personnel Board Building at 801 Capitol Mall. Note that the EDD Headquarters Building is located on two downtown blocks and has two addresses, 722 Capitol Mall and 800 Capitol Mall. However, for purposes of this EIR, only the 800 Capitol Mall address is used.

The EIR will also consider, at a programmatic level consistent with Section 15168 of the State CEQA Guidelines, a potential future development scenario at the building demolition sites. Upon completion of the demolition, the site is intended to be redeveloped with future uses. DGS has been in discussions with California State University, Sacramento (Sacramento State or the University) for the potential reuse of the site. DGS has granted Sacramento State a period of exclusivity to evaluate the redevelopment potential of the site and DGS may, but has not formally committed to, ultimately transferring the site to the Board of Trustees of the California State University (CSU), which is the State of California acting in its higher education capacity, for use by Sacramento State. The intent of the proposed project is to demolish the subject properties regardless of whether a transfer to CSU occurs. Once the future land recipient is confirmed and a more detailed development scenario is identified, CSU or other appropriate lead agency is expected to prepare a separate CEQA analysis for that scenario.

1.2 PURPOSE AND INTENDED USES OF THIS DRAFT EIR

According to CEQA, preparation of an EIR is required whenever it can be fairly argued, based on substantial evidence, that a proposed project may result in a significant environmental impact. An EIR is an informational document used to inform public-agency decision makers and the general public of the significant environmental impacts of a project, identify possible ways to minimize the significant impacts, and describe reasonable alternatives to the project that could feasibly attain most of the basic objectives of the project while substantially lessening or avoiding any of the significant environmental impacts. Public agencies are required to consider the information presented in the EIR when determining whether to approve a project. This Draft EIR has been prepared to meet the requirements of a project EIR as defined by Section 15161 of the State CEQA Guidelines for demolition of the existing buildings and

transfer of the property to another entity (e.g., CSU). A project EIR focuses on the changes in the physical environment that would result from the implementation of a project, including its planning, construction, and operation. The State's intention in preparing a project EIR for building demolition and land transfer is that no further environmental analysis would be required for additional regulatory approvals following approval of the project, absent conditions requiring a subsequent EIR, a supplement to the EIR, or an addendum. (See State CEQA Guidelines Sections 15162–15164.)

Because the University has only identified a preliminary range of possible uses for the project site but has not yet developed specific plans, there is insufficient detail at this time to analyze future uses at a project level of detail in this EIR (see CEQA Guidelines Section 15161). Accordingly, this EIR evaluates the site's future development at a programmatic level consistent with CEQA Guidelines Section 15168. Once the future land recipient is confirmed and a more detailed development scenario is identified, CSU (or other appropriate lead agency) is expected to prepare a separate CEQA analysis for that scenario.

1.3 SCOPE OF THIS DRAFT EIR

This Draft EIR includes an evaluation of the following 16 environmental issue areas as well as other CEQA-mandated issues (e.g., cumulative impacts, growth-inducing impacts, significant unavoidable impacts, alternatives):

- land use and planning;
- population, employment, and housing;
- transportation and circulation;
- utilities and service systems
- air quality;
- greenhouse gas emissions and climate change;
- energy;
- noise and vibration;
- geology and soils;
- hydrology and water quality;
- hazards and hazardous materials;
- cultural resources;
- Tribal cultural resources;
- biological resources;
- public services and recreation; and
- aesthetics, light, and glare.

Under the CEQA statutes and the State CEQA Guidelines, a lead agency may limit an EIR's discussion of environmental effects when such effects are not considered potentially significant (PRC Section 21002.1[e]; State CEQA Guidelines Sections 15128, 15143). Information used to determine which impacts would be potentially significant was derived from review of the Capitol Mall Office Buildings Demolition Project; review of applicable planning documents and CEQA documentation; field work; feedback from public and agency consultation; the outcome of a public scoping meeting held on March 17, 2026; and comments received on the Notice of Preparation (NOP) (see Appendix A of this Draft EIR).

The NOP was distributed on March 3, 2026, to responsible agencies, interested parties, and organizations, as well as private organizations and individuals that may have an interest in the project. The purpose of the NOP and the scoping meeting was to provide notification that an EIR for the Capitol Mall Office Buildings Demolition Project was being prepared and to solicit input on the scope and content of the environmental document. As a result of the review of existing information and the scoping process, it was determined that each of the issue areas listed above should be evaluated fully in this Draft EIR. Further information on the NOP and scoping process is provided below in Section 1.5, "Public Review Process."

1.4 AGENCY ROLES AND RESPONSIBILITIES

1.4.1 Lead Agency

DGS is the lead agency under CEQA responsible for ensuring that the requirements of CEQA have been met. After the EIR public review process is complete, the Director of DGS will determine whether to certify the EIR (see State CEQA Guidelines Sections 15090) and approve the project.

1.4.2 Trustee and Responsible Agencies

A trustee agency is a State agency that has jurisdiction by law over natural resources that are held in trust for the people of the State of California. The only trustee agency that has jurisdiction over resources potentially affected by the project is the California Department of Fish and Wildlife.

Responsible agencies are public agencies, other than the lead agency, that have discretionary approval responsibility for reviewing, carrying out, or approving elements of a project. Responsible agencies should participate in the lead agency's CEQA process, review the lead agency's CEQA document, and use the document when making a decision on project elements. For example, the City of Sacramento will use this EIR for discretionary actions such as sidewalk, roadway, or alley encroachment permits and permits for connections to City-operated utilities. Agencies that may have responsibility for, or jurisdiction over, the implementation of elements of the project include the following:

STATE AGENCIES

- California State Parks, Office of Historic Preservation
- California Air Resources Board
- California Department of Fish and Wildlife
- Central Valley Regional Water Quality Control Board (RWQCB) (Region 5)

REGIONAL AND LOCAL AGENCIES

- City of Sacramento
- Sacramento Metropolitan Air Quality Management District (SMAQMD)

1.4.3 Required Permits and Approvals

This section identifies the permits and other approval actions likely to be required before implementation of individual elements of the proposed project.

STATE ACTIONS/PERMITS

California State Parks, Office of Historic Preservation: Review of project design pursuant to PRC Sections 5024(f) and 5024.5 regarding historic resources and consultation regarding the project's potential to adversely affect historic buildings that are adjacent to or in the vicinity of the site.

Central Valley RWQCB (Region 5): National Pollutant Discharge Elimination System construction stormwater permit (Notice of Intent to proceed under General Construction Permit), discharge permit for stormwater, general order for dewatering, recycled water permit.

REGIONAL AND LOCAL ACTIONS/PERMITS

City of Sacramento: Sidewalk, roadway, and encroachment permits, permits for connections to City operated utilities.

SMAQMD: Permit to construct and permit to operate.

1.5 PUBLIC REVIEW PROCESS

As identified above in Section 1.3, "Scope of this Draft EIR," in accordance with CEQA regulations, an NOP was distributed on March 3, 2026, to responsible agencies, interested parties and organizations, and private organizations and individuals that could have interest in the project. The NOP was available at the Sacramento Central Library at 828 I Street and at the California Department of General Services office at 707 Third Street in West Sacramento and on the DGS website.

The purpose of the NOP was to provide notification that an EIR for the project was being prepared and to solicit input on the scope and content of the document. The NOP and comments received in response to the NOP are included in Appendix A of this Draft EIR.

This Draft EIR is being circulated for public review and comment for a period of 45 days. During this period, comments from the general public as well as organizations and agencies on environmental issues may be submitted to the lead agency.

Upon completion of the public review and comment period, a Final EIR will be prepared that will include both written and oral comments on the Draft EIR received during the public review period, responses to those comments, and any revisions to the Draft EIR made in response to public comments. The Draft EIR and Final EIR together will make up the EIR for the project.

Before adopting the Capitol Mall Office Buildings Demolition Project, the lead agency is required to certify that the EIR has been completed in compliance with CEQA, that the decision-making body reviewed and considered the information in the EIR, and that the EIR reflects the independent judgment of the lead agency.

1.6 DRAFT EIR ORGANIZATION

This Draft EIR is organized into chapters, as identified and briefly described below. Chapters are further divided into sections (e.g., Chapter 4, "Environmental Impacts and Mitigation Measures" and Section 4.8, "Energy"):

- Chapter 1, "Introduction": This chapter provides a synopsis of the project; a description of the type, purpose, and intended uses of this Draft EIR; a description of the scope of this EIR; a description of the lead and responsible agencies; a summary of the public review process; a description of the organization of this EIR; and definitions of standard terminology used in this EIR.
- Chapter 2, "Executive Summary": This chapter introduces the project; provides a summary of the environmental review process, effects found not to be significant, and key environmental issues; and lists significant impacts and mitigation measures to reduce significant impacts to a less-than-significant level.
- Chapter 3, "Project Description": This chapter describes the background and need, project objectives, and project location, and describes the project elements in detail.
- Chapter 4, "Environmental Impacts and Mitigation Measures": The sections in this chapter evaluate the expected environmental impacts generated by the project, arranged by subject area (e.g., land use, hydrology and water quality). In each subsection of Chapter 4, the regulatory background, existing conditions, analysis methodology, and thresholds of significance are described. The anticipated changes to the existing conditions after implementation of the project are then evaluated for each subject area. For any significant or potentially significant impact that would result from project implementation, mitigation measures are presented and the level of impact significance after mitigation is identified. Environmental impacts are numbered sequentially within each section (e.g., Impact 4.2-1, Impact 4.2-2, etc.). Any required mitigation measures are numbered to

correspond to the impact numbering; therefore, the mitigation measure for Impact 4.2-2 would be Mitigation Measure 4.2-2. Within the text, building demolition and future redevelopment are evaluated as separate considerations for both impacts and mitigation measures.

- Chapter 5, "Cumulative Impacts": This chapter provides information required by CEQA regarding cumulative impacts that would result from implementation of the project, as well as other past, present, and probable future projects.
- Chapter 6, "Other CEQA Sections": This chapter evaluates growth-inducing impacts, and discloses significant and unavoidable adverse impacts and significant and irreversible environmental changes.
- Chapter 7, "Alternatives": This chapter evaluates alternatives to the project, including alternatives considered but eliminated from further consideration, the No Project Alternative, and two action alternatives. The environmentally superior alternative is identified.
- Chapter 8, "References": This chapter identifies the organizations and persons consulted during preparation of this Draft EIR and the documents and individuals used as sources for the analysis.
- Chapter 9, "Report Preparers": This chapter identifies the preparers of the document.

1.7 STANDARD TERMINOLOGY

This Draft EIR uses the following standard terminology:

- "No impact" means no change from existing conditions (no mitigation is needed).
- "Less-than-significant impact" means no substantial adverse change in the physical environment (no mitigation is needed).
- "Potentially significant impact" means a substantial adverse change in the environment that might occur (mitigation is recommended because potentially significant impacts are treated as significant).
- "Significant impact" means a substantial adverse change in the physical environment that would occur (mitigation is recommended).
- "Significant and unavoidable impact" means a substantial adverse change in the physical environment that would occur and that cannot be avoided, even with the implementation of all feasible mitigation.

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2 EXECUTIVE SUMMARY

2.1 INTRODUCTION

This summary is provided in accordance with California Environmental Quality Act Guidelines (State CEQA Guidelines) Section 15123. As stated in Section 15123(a), "an EIR [environmental impact report] shall contain a brief summary of the proposed action and its consequences. The language of the summary should be as clear and simple as reasonably practical." As required by the guidelines, this chapter includes (1) a summary description of the proposed Capitol Mall Office Buildings Demolition Project (project), (2) a synopsis of environmental impacts and recommended mitigation measures (Table ES-1), (3) identification of the alternatives evaluated and of the environmentally superior alternative, and (4) a discussion of the areas of controversy associated with the project.

2.2 SUMMARY DESCRIPTION OF THE PROJECT

The proposed project includes three primary components: (1) demolition of the three existing buildings on the project site; (2) transfer of the state-owned property to another entity for redevelopment, which, for purposes of this EIR, is assumed to be the Board of Trustees of the California State University (CSU), and (3) future site development by California State University, Sacramento (Sacramento State or the University). Although these components are evaluated together in this EIR, demolition of the existing structures would occur regardless of whether the property is transferred and is not contingent upon, or dependent on, subsequent redevelopment.

2.2.1 Project Location

The project site contains three existing state-owned office buildings in downtown Sacramento, along Capitol Mall and N Street. Specifically, the Employment Development Department (EDD) Headquarters Building located at 800 Capitol Mall (this building has structures on both the 700 and 800 blocks of Capitol Mall but the address used for this EIR is 800 Capitol Mall); the EDD "Solar Building" Annex located at 751 N Street; and the State Personnel Board Building located at 801 Capitol Mall.

The project site covers approximately 5.5 acres and is located within the Central Business District (CBD) of the Central City Community Plan area and is designated by the Capitol Area Plan (CAP) Land Use Diagram and City of Sacramento as "office" (Accessor Parcel Numbers 006-0156-001, 006-0154-001, and 006-0155-011). The project site is zoned as Central Business District Zone with a Special Planning District overlay (C-3-SPD).

The project site is located in downtown Sacramento within a developed urban area characterized by a mix of governmental, commercial, residential, entertainment, and civic uses. Adjacent land uses include state-owned office buildings, federal offices, retail and restaurant uses, structured parking, and the historic Sutter Club Building. Within the surrounding area are the California State Capitol and Capitol Park, numerous state and private office buildings, apartment developments, the Golden 1 Center, and the Downtown Commons (DOCO) district.

2.2.2 Background and Need for the Project

The purpose of the project is to remove underutilized office space and allow for future redevelopment of the site. The three state-owned office buildings, which were constructed between 1954 and 1984, contain deficiencies relative to current building standards and operational needs, including life safety, accessibility, energy efficiency, hazardous materials, and workspace limitations. Previous evaluations found the buildings unsuitable for continued office use or adaptive reuse without substantial upgrades and costly abatement. Two of the buildings are vacant and the third is occupied at less than half capacity. Accordingly, the Department of General Services (DGS) proposes demolition of the existing structures to facilitate future redevelopment opportunities.

DGS has engaged in discussions with Sacramento State regarding the potential future use of the site and has granted the University an exclusive period to evaluate redevelopment opportunities. Because specific redevelopment plans have not yet been identified, this EIR evaluates a representative future development scenario at a programmatic level. Subsequent redevelopment proposals would be subject to separate CEQA review once more detailed plans are available.

2.2.3 Project Objectives

Consistent with, and in furtherance of DGS's mission, the objectives of the Capitol Mall Office Buildings Demolition Project are to:

- support the State in removing underutilized property from its real estate portfolio;
- provide an opportunity for development of land uses on the subject parcels that integrate with the existing surroundings and take advantage of existing assets such as proximity to multiple transit modes (e.g., bus, light rail);
- support the opportunity to optimize the development potential on the project parcels while maintaining conformity with the Capitol View Protection Act;
- support the efficient use of State funds and resources; and
- allow for provision of facilities on the project parcels that meet current construction standards and codes.

2.2.4 Characteristics of the Project

As stated previously, the proposed project includes three primary components: (1) demolition of the three existing state-owned office buildings on the project site, (2) transfer of the state-owned property to another entity for redevelopment, which for purposes of this EIR is assumed to be CSU, and (3) future site development by Sacramento State. Each of these components is discussed below.

BUILDING DEMOLITION

The demolition component would remove approximately 729,700 square feet of existing office space, including the EDD Headquarters Building, EDD Solar Building Annex, and State Personnel Board Building. Demolition activities would begin with hazardous materials abatement, followed by building demolition, utility disconnection and relocation as necessary, removal and recycling of demolition materials, and site security measures. Abatement and demolition are anticipated to begin in Fall 2027 and occur over approximately 18 months. Temporary traffic, pedestrian, bicycle, and transit disruptions would occur during demolition activities, including limited nighttime work and temporary street closures associated with removal of the EDD Headquarters Building sky bridge crossing 8th Street.

LAND TRANSFER

The project site is currently owned and managed by DGS. Upon completion of demolition, DGS may transfer the property to another entity. For purposes of this EIR that entity is assumed to be CSU. DGS would no longer have jurisdiction over the site following a transfer.

FUTURE SITE DEVELOPMENT

In collaboration with Sacramento State and CSU, a programmatic redevelopment scenario has been developed that reflects the range of uses being considered for a downtown campus. Potential uses include academic facilities, student housing, market-rate housing, a conference and event center, hotel, innovation and cultural facilities, performing arts venues, retail uses, office space, and structured parking. Future development would be required to comply with applicable regulations, including the Capitol View Protection Act, and would be subject to subsequent CEQA review once more detailed redevelopment plans are prepared.

2.3 ENVIRONMENTAL IMPACTS AND RECOMMENDED MITIGATION MEASURES

Table ES-1, presented at the end of this chapter, provides a summary of the environmental impacts of the proposed Capitol Mall Office Buildings Demolition Project. The table provides the level of significance of the impact before mitigation, recommended mitigation measures, and the level of significance of the impact after implementation of mitigation measures, if recommended.

The proposed Capitol Mall Office Buildings Demolition Project would result in the following significant and unavoidable impacts; that is, no feasible mitigation is available to reduce the project's impacts to a less-than-significant level.

Transportation and Circulation

- Conflict with a Program, Plan, Ordinance, or Policy Addressing the Circulation System, Including Transit, Roadway, Bicycle, and Pedestrian Facilities (project and cumulative)
- Result in Demolition/Construction Activity that Could Cause Temporary Impacts to Transportation and Traffic (project)

Air Quality

- Conflict with or Obstruct Implementation of an Applicable Air Quality Plan (project and cumulative)
- Result in a Cumulatively Considerable Net Increase of Any Criteria Pollutant for Which the Project Region is Non-attainment Under an Applicable Federal or State Ambient Air Quality Standard (project and cumulative)

Greenhouse Gas Emissions and Climate Change

- Generate GHG Emissions, Either Directly or Indirectly, That May Have a Significant Impact on the Environment or Conflict with or Obstruct a GHG Reduction Plan (project and cumulative)

Noise and Vibration

- Short-Term Construction/Demolition-Related Noise Levels (project)
- Short-Term Construction/Demolition-Related Vibration Levels (project)

Cultural Resources

- Cause a Substantial Adverse Change in the Significance of a Historical Resource (project and cumulative)

Tribal Cultural Resources

- Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource (project [future development] and cumulative)

2.4 ALTERNATIVES TO THE PROPOSED PROJECT

The following alternatives are evaluated in this Draft EIR.

- **Alternative 1: No Project–No Development** assumes no demolition of the existing structures nor construction of new buildings. The project site would remain in its current condition.
- **Alternative 2: Demolition with No Redevelopment** assumes that the existing structures would be demolished with no determined plans for future reuse or development.
- **Alternative 3: Transfer of Property for Office and/or Housing Development** assumes that demolition of existing structures would occur and that the property would be transferred to an entity that plans to develop the project site for office uses, market rate housing uses, or a combination thereof with ground-floor retail.

2.4.1 Environmentally Superior Alternative

Because the No Project–No Development Alternative (Alternative 1) would avoid all adverse impacts resulting from building demolition and future redevelopment of the project site, it is the environmentally superior alternative. However, Alternative 1 would not meet the project objectives, and because of the value of the downtown location, it is unlikely that the vacant buildings would stand in perpetuity.

When the environmentally superior alternative is the No Project Alternative, the State CEQA Guidelines (Section 15126[d][2]) require selection of an environmentally superior alternative from among the other action alternatives evaluated. The Demolition with No Redevelopment Alternative (Alternative 2) would be the environmentally superior action alternative because, although it would not avoid all significant or significant and unavoidable impacts identified for the proposed project (e.g., historic resources impacts associated with demolition), it would result in fewer or reduced environmental impacts than both the proposed project and Alternative 3 in several resource areas. Unlike the proposed project and Alternative 3, Alternative 2 would not include future redevelopment of the site and, therefore, would avoid many of the future construction and operational impacts associated with redevelopment. As a result, Alternative 2 would generally result in reduced impacts related to population, employment, and housing; transportation and circulation; utilities and service systems; air quality; GHG emissions; energy; noise and vibration; geology and soils; hydrology and water quality; hazards and hazardous materials; biological resources; public services and recreation; and aesthetics. Although Alternative 2 would still result in impacts associated with demolition of the existing buildings, including impacts to historic resources, its overall environmental effects would be less than those of the other action alternatives. Like Alternative 1, it is unlikely that the parcels would remain vacant indefinitely, but interim uses such as those identified (e.g., parking, farmers markets, community events, staging areas) would create some value until more permanent uses are proposed.

2.5 AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

A notice of preparation (NOP) was distributed for the Capitol Mall Office Buildings Demolition Project on March 3, 2026, to agencies and the general public. In addition, a public scoping meeting was held on March 17, 2026. The purpose of the NOP and the scoping meeting was to provide notification that an EIR for was being prepared for the project and to invite comments on the scope and content of the environmental document. The NOP and responses to the NOP are included in Appendix A of this Draft EIR. No areas of controversy were raised through the scoping process or in any other communication received during preparation of this Draft EIR. Nonetheless, potential impacts on the adjacent Sutter Club, a historical resource, could be considered an area of public interest or controversy because demolition and future development activities would occur immediately adjacent to the building. Similarly, the demolition of two buildings, the EDD Headquarters Building and the State Personnel Board Building, which are contributors to the three-building Capitol Mall State Buildings Historic District, could be considered an area of public interest or controversy.

The following environmental issues were raised during scoping, but they are not considered controversial:

- potential safety and access considerations related to existing oil, gas, or geothermal wells, including well integrity, re-abandonment requirements, and approvals of the California Geologic Energy Management Division, although no wells are present within the project area;
- potential air quality, greenhouse gas, and climate change impacts;
- potential public health risks associated with demolition activities, including asbestos exposure;
- evaluation of alternatives involving reuse of the existing buildings, or documentation of why reuse would not meet future needs;
- potential impacts associated with the landfilling, recycling, or reuse of demolition materials;
- potential impacts on implementation of regional transportation and air quality plans (e.g., the Metropolitan Transportation Plan and the Sacramento Regional Ozone Attainment Plan);

- consistency with applicable local plans and policies related to adaptive reuse and existing structure preservation (e.g., Policy LU.1.3 for Adaptive Reuse in Sacramento's Central City Specific Plan, and Policy LUP-10.1 for Existing Structure Reuse in the City of Sacramento 2040 General Plan);
- potential impacts on existing electrical infrastructure, including transmission and distribution lines, utility easements, utility routing, transformer vaults, underground facilities, and Sacramento Municipal Utility District infrastructure;
- electrical demand, energy efficiency, and cumulative impacts related to increased electrical service and delivery needs;
- abandonment of existing water services associated with demolition and provision of water, sewer, and drainage infrastructure for future development;
- traffic control and circulation management during demolition and construction activities;
- potential effects on vehicular, pedestrian, bicycle, and transit circulation, including access, queuing, and interactions among future site uses; and
- pedestrian, bicycle, and transit improvements needed to support future development and multimodal access.

Issues that fall within the scope of CEQA are addressed in this Draft EIR. Issues that fall outside the scope of CEQA are not evaluated in this Draft EIR; however, DGS will continue to respond to these issues through the project planning process.

All of the substantive environmental issues raised in the NOP comment letters have been addressed or otherwise considered during preparation of this Draft EIR.

Table 2-1 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Land Use and Planning			
Impact 4.2-1: Potential to Divide an Established Community	LTS	No mitigation is required for this impact.	LTS
Impact 4.2-2: Consistency with Land Use Plans and Documents	LTS	No mitigation is required for this impact.	LTS
Population, Employment, and Housing			
Impact 4.3-1: Induce Population Growth and Housing Demand During Demolition/Construction	LTS	No mitigation is required for this impact.	LTS
Impact 4.3-2: Increased Employment Opportunities and Housing Demand from Project Development	LTS	No mitigation is required for this impact.	LTS
Transportation and Circulation			
Impact 4.4-1: Conflict with a Program, Plan, Ordinance, or Policy Addressing the Circulation System, Including Transit, Roadway, Bicycle, and Pedestrian Facilities	PS	Mitigation Measure 4.4-1a: Develop and implement an Event Transportation Management Plan (ETMP) Mitigation Measure 4.4-1b: Implement transportation demand management strategies to minimize delays to transit service Mitigation Measure 4.4-1c: Plan project development to minimize conflicts with pedestrian, bicycle, and transit facilities	SU
Impact 4.4-2: Conflict or be Inconsistent with CEQA Guidelines Section 15064.3(b)	LTS	No mitigation is required for this impact.	LTS
Impact 4.4-3: Substantially Increase Hazards Due to a Geometric Design Feature or Incompatible Uses	LTS	No mitigation is required for this impact.	LTS
Impact 4.4-4: Result in Inadequate Emergency Access	LTS	No mitigation is required for this impact.	LTS
Impact 4.4-5: Result in Demolition/Construction Activity that Could Cause Temporary Impacts to Transportation and Traffic	S	Mitigation Measure 4.4-5a: Coordinate with transit operators to implement temporary light rail and bus service modifications during project demolition and construction activities Mitigation Measure 4.4-5b: Coordinate with City of Sacramento and SacRT to minimize conflicts between project demolition and Downtown Riverfront Streetcar Project construction activities	SU
Utilities and Service Systems			
Impact 4.5-1: New or Expanded Utility Infrastructure	LTS	No mitigation is required for this impact.	LTS
Impact 4.5-2: Adequate Water Supplies	LTS	No mitigation is required for this impact.	LTS
Impact 4.5-3: Wastewater Infrastructure and Treatment Capacity	LTS	No mitigation is required for this impact.	LTS
Impact 4.5-4: Landfill Capacity and Compliance with Solid Waste Regulations	LTS	No mitigation is required for this impact.	LTS

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Air Quality			
Impact 4.6-1: Conflict with or Obstruct Implementation of an Applicable Air Quality Plan	S	Mitigation Measure 4.6-1: Implement SMAQMD's Basic Construction Emission Control Practices	SU
Impact 4.6-2: Result in a Cumulatively Considerable Net Increase of Any Criteria Pollutant for Which the Project Region is Non-attainment Under an Applicable Federal or State Ambient Air Quality Standard	S	Mitigation Measure 4.6-1: Implement SMAQMD's Basic Construction Emission Control Practices Mitigation Measure 4.6-2a: Reduce Emissions from Landscaping Mitigation Measure 4.6-2b: Reduce Emissions from Architectural Coatings	SU
Impact 4.6-3: Expose Sensitive Receptors to Substantial Pollutant Concentrations	LTS	No mitigation is required for this impact.	LTS
Impact 4.6-4: Create Objectionable Odors Affecting a Substantial Number of People	LTS	No mitigation is required for this impact.	LTS
Greenhouse Gas Emissions and Climate Change			
Impact 4.7-1: Generate GHG Emissions, Either Directly or Indirectly, That May Have a Significant Impact on the Environment or Conflict with or Obstruct a GHG Reduction Plan	PS	Mitigation Measure 4.7-1a: Construction GHG Emissions Reduction Mitigation Measure 4.7-1b: Restrict Natural Gas Use Mitigation Measure 4.7-1c: Install CalGreen Tier 2-Compliant On-Site Electric Vehicle Charging Infrastructure	Construction = LTS Operation = SU
Energy			
Impact 4.8-1: Wasteful, Inefficient, or Unnecessary Consumption of Energy, During Project Demolition, Construction, or Operation	LTS	No mitigation is required for this impact.	LTS
Impact 4.8-2: Conflict with or Obstruct a State or Local Plan for Renewable Energy or Energy Efficiency	PS	Mitigation Measure 4.8-2: Document Campus Master Plan Consistency with the CSU Sustainability Policy	LTS
Noise and Vibration			
Impact 4.9-1: Short-Term Demolition/Construction-Related Noise Levels	PS	Mitigation Measure 4.9-1: Nighttime Demolition and Construction Noise Reduction Methods	SU
Impact 4.9-2: Short-Term Demolition- and Construction-Related Vibration Levels	PS	Mitigation Measure 4.9-2a: Reduce Vibration-Related Disturbance During Demolition and Construction Mitigation Measure 4.9-2b: Reduce Potential Structural Damage from Demolition and Construction Vibration	SU
Impact 4.9-3: Long-term Operational Transportation Noise Levels	LTS	No mitigation is required for this impact.	LTS

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Impact 4.9-4: Long-Term Operational Stationary Noise Levels	PS	Mitigation Measure 4.9-4a: Implement Stationary Noise Reduction Methods to Reduce Backup Generator and HVAC Noise Mitigation Measure 4.9-4b: Implement Noise Reduction Methods to Reduce Exterior Noise Associated with the Conference and Event Center and Performing Arts and Music Venue	LTS
Geology and Soils			
Impact 4.10-1: Seismic Hazards	LTS	No mitigation is required for this impact.	LTS
Impact 4.10-2: Liquefaction	LTS	No mitigation is required for this impact.	LTS
Impact 4.10-3: Subsidence and Dynamic Compaction	LTS	No mitigation is required for this impact.	LTS
Impact 4.10-4: Expansive Soils	LTS	No mitigation is required for this impact.	LTS
Hydrology and Water Quality			
Impact 4.11-1: Construction-Related Water Quality Impacts	LTS	No mitigation is required for this impact.	LTS
Impact 4.11-2: Substantially Alter the Existing Drainage Pattern of the Site or Area, Resulting in Substantial Erosion, Siltation, Flooding, or Additional Sources of Polluted Runoff	LTS	No mitigation is required for this impact.	LTS
Hazards and Hazardous Materials			
Impact 4.12-1: Storage, Use, Transport, or Upset of Hazardous Materials	LTS	No mitigation is required for this impact.	LTS
Impact 4.12-2: Exposure of the Public or the Environment to Hazardous Materials	LTS	No mitigation is required for this impact.	LTS
Impact 4.12-3: Emit Hazardous Emissions or Handle Hazardous or Acutely Hazardous Materials, Substances, or Waste within One-Quarter Mile of an Existing or Proposed School	LTS	No mitigation is required for this impact.	LTS
Impact 4.12-4: Impaired Implementation of or Physical Interference with an Adopted Emergency Response Plan or Emergency Evacuation Plan	LTS	No mitigation is required for this impact.	LTS
Cultural Resources			
Impact 4.13-1: Cause a Substantial Adverse Change in the Significance of a Historical Resource	PS	Mitigation Measure 4.13-1a: Update California State Government Building District Documentation Mitigation Measure 4.13-1b: Prepare Archival Recordation Documentation for the Capitol Mall State Buildings Historic District Mitigation Measure 4.13-1c: Prepare Existing Conditions Memo Mitigation Measure 4.13-1d: Implement Physical Protection and Measures for the Sutter Club Mitigation Measure 4.13-1e: Implement Mitigation Measures 4.9-2a and 4.9-2b	SU

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		Mitigation Measure 4.13-1f: Include a Qualified Architectural Historian or Historic Architect in Sutter Club Protection Measures Mitigation Measure 4.13-1g: Repair Inadvertent Damage	
Impact 4.13-2: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources	PS	Mitigation Measure 4.13-2: Halt Ground Disturbance Upon Discovery of Subsurface Archaeological Features	LTS
Impact 4.13-3: Disturb Human Remains	LTS	No mitigation is required for this impact.	LTS
Tribal Cultural Resources			
Impact 4.14-1: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource	PS	Mitigation Measure 4.14-1a: Prepare and Implement a Worker Awareness Training Program for Tribal Cultural Resources Mitigation Measure 4.14-1b: Implement Tribal and Archaeological Monitoring Mitigation Measure 4.14-1c: Halt Ground Disturbance Upon Discovery of Subsurface Tribal Cultural Resources and Evaluate Discovered Resource	Demolition = LTS Future development = SU
Biological Resources			
Impact 4.15-1: Potential Disturbance to Foraging Crotch's Bumble Bees and Monarch Butterflies	LTS	No mitigation is required for this impact.	LTS
Impact 4.15-2: Potential Disturbance to Swainson's Hawk, Other Nesting Raptors, and Other Native Nesting Birds	PS	Mitigation Measure 4.15-2: Protect Nesting Swainson's Hawks, Other Raptors, and Other Native Nesting Birds During Demolition and Construction Activities	LTS
Impact 4.15-3: Disturbance to Common Bat Roosts and Maternal Colonies	PS	Mitigation Measure 4.15-3: Prior to Building Demolition Conduct Surveys for Bats and Exclude Bats from Roosting Sites	LTS
Impact 4.15-4: Conflict with Any Local Policies or Ordinances Protecting Biological Resources	PS	Mitigation Measure 4.15-4: Protect, Remove, and Replace City Trees Consistent with the City of Sacramento Tree Preservation Ordinance	LTS
Public Services and Recreation			
Impact 4.16-1: Increased Demand for Fire Protection Services, Facilities, and Equipment	LTS	No mitigation is required for this impact.	LTS
Impact 4.16-2: Increased Demand for Fire Flow	LTS	No mitigation is required for this impact.	LTS
Impact 4.16-3: Increased Demand for Law Enforcement Services, Facilities, and Equipment	LTS	No mitigation is required for this impact.	LTS
Impact 4.16-4: Increased Demand for School Services	LTS	No mitigation is required for this impact.	LTS
Impact 4.16-5: Increased Demand for Recreational Facilities	LTS	No mitigation is required for this impact.	LTS

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Aesthetics, Light, and Glare			
Impact 4.17-1: Adverse Effect on a Scenic Vista	LTS	No mitigation is required for this impact.	LTS
Impact 4.17-2: Substantially Degrade Existing Visual Character or Quality	LTS	No mitigation is required for this impact.	LTS
Impact 4.17-3: Conflict with Applicable Zoning and Other Regulations Governing Scenic Quality	LTS	No mitigation is required for this impact.	LTS
Impact 4.17-4: Introduction of New Sources of Light and Glare that Adversely Affect Day or Nighttime Views	LTS	No mitigation is required for this impact.	LTS

3 PROJECT DESCRIPTION

3.1 PROJECT BACKGROUND AND NEED

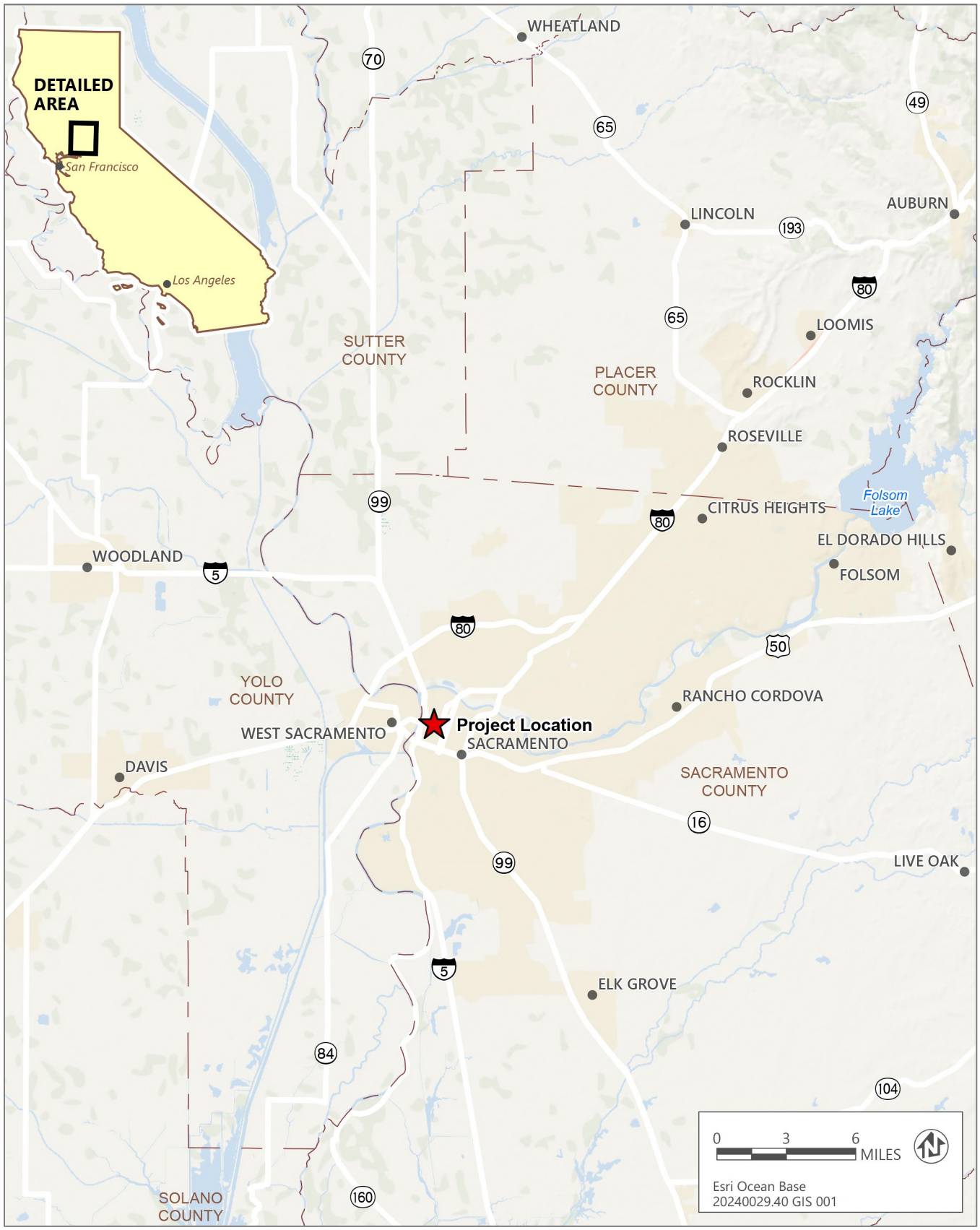
The proposed project consists of the removal of three existing state-owned office buildings in downtown Sacramento along Capitol Mall and N Street: the Employment Development Department (EDD) Headquarters at 800 Capitol Mall, the EDD "Solar Building" Annex at 751 N Street, and the State Personnel Board Building at 801 Capitol Mall (Figures 3-1 and 3-2). Note that the EDD Headquarters Building is located on two downtown blocks and has two addresses, 722 Capitol Mall and 800 Capitol Mall. However, for purposes of this EIR, only the 800 Capitol Mall address is used. The purpose of the demolition is to allow the Department of General Services (DGS) to remove underutilized office space and allow for the future development of other uses on these parcels.

The EDD Headquarters Building was built in 1955, and the EDD Solar Building Annex was constructed in 1984. The State Personnel Board Building was built in 1954. These buildings were constructed in accordance with the versions of the Uniform Building Code (UBC) in effect at the time of construction. The code in effect today is the 2025 California Building Code (CBC). While the mission of the code has largely remained the same, considerable changes have been made since the UBC editions in effect at the time of construction of each building. New regulations and standards related to building facilities and performance have been adopted. In fact, the UBC has been updated on a triennial (every 3 years) basis since 2007, with the 2025 Code the sixth updated edition since 2007. Identified deficiencies in the three buildings planned for removal relative to current building standards and building operations include:

- life safety/building code deficiencies (e.g., outdated fire alarm system, lack of fire sprinklers, non-compliant stairwell widths);
- use of building materials containing hazardous materials such as lead based paint, asbestos, and polychlorinated biphenyls (PCBs);
- non-compliance with Americans with Disabilities Act standards;
- non-compliance with energy efficiency standards; and
- insufficient working space quality such as consistent access to natural light.

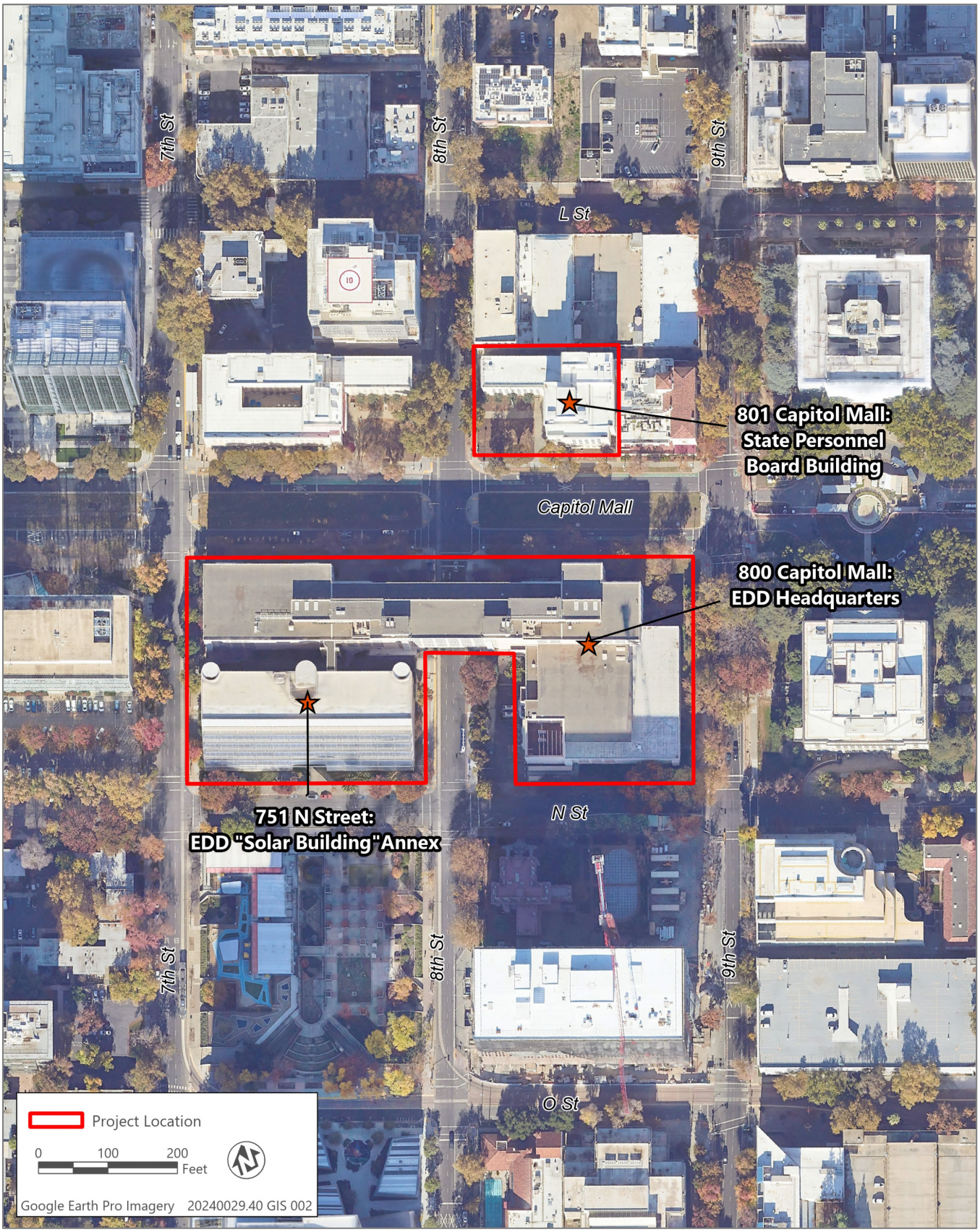
Past evaluations of these buildings have found them unsuitable for continued office use or re-use for housing or other purposes in their current state (DGS 2021). Renovations of the building interiors would necessitate extensive and potentially costly abatement of lead-based paint and asbestos-containing materials commonly associated with buildings of this age. Additionally, the buildings do not meet the requirements of the California Building Code in effect at the time of the evaluation (i.e., 2019 CBC) and exhibit structural deficiencies and design constraints that would complicate compliance with current code standards. As a result, substantial upgrades and modifications would be required to facilitate future occupancy or conversion, including for potential reuse as affordable housing. The EDD Headquarters Building and the EDD Solar Building Annex are currently both vacant. The State Personnel Board Building, though occupied, is at less than half of capacity and has been so for more than 2 years. Therefore, the State is proposing demolition of these underutilized buildings to allow for the future development of other uses on these parcels.

Prior to initiation of preparation of this EIR, DGS has been in ongoing discussions with California State University, Sacramento (Sacramento State or the University) for the potential reuse of the site. DGS has granted Sacramento State a period of exclusivity to evaluate the redevelopment potential of the site and DGS may, but has not formally committed to, ultimately transferring the site to the Board of Trustees of the California State University (CSU), which is the State of California acting in its higher education capacity, for use by Sacramento State. The intent of the proposed project is to demolish the subject properties regardless of whether a transfer to CSU occurs.



Source: Adapted by Ascent in 2026.

Figure 3-1 Regional Location



Source: Adapted by Ascent in 2026.

Figure 3-2 Project Location

The University is in early stages of developing a program for the site and intends to eventually prepare a master plan development proposal for a Downtown Sacramento campus of Sacramento State. In collaboration with Sacramento State and CSU, a development scenario has been included in this EIR that is reflective of the land uses the University is considering for the downtown campus. That development scenario is described below in Section 3.4.3, "Future Site Development."

As identified in Chapter 1, "Introduction," because the University has only identified a preliminary range of possible uses for the project site but has not yet developed specific plans, there is insufficient detail at this time to analyze future uses at a project level of detail in the EIR (see CEQA Guidelines Section 15161). Accordingly, this EIR will evaluate the site's future development at a programmatic level consistent with CEQA Guidelines Section 15168. Once the future land recipient is confirmed and a more detailed development scenario is identified, CSU or other appropriate lead agency is expected to prepare a separate CEQA analysis for that scenario.

The intent of the proposed project is to demolish the three existing state-owned office buildings irrespective of whether ownership of the site is transferred to Sacramento State. Accordingly, demolition of the existing structures would occur regardless of a future transfer of the property and is not contingent upon, or dependent on, subsequent development by Sacramento State.

3.2 PROJECT OBJECTIVES

Consistent with, and in furtherance of DGS's mission, the objectives of the Capitol Mall Office Buildings Demolition Project are to:

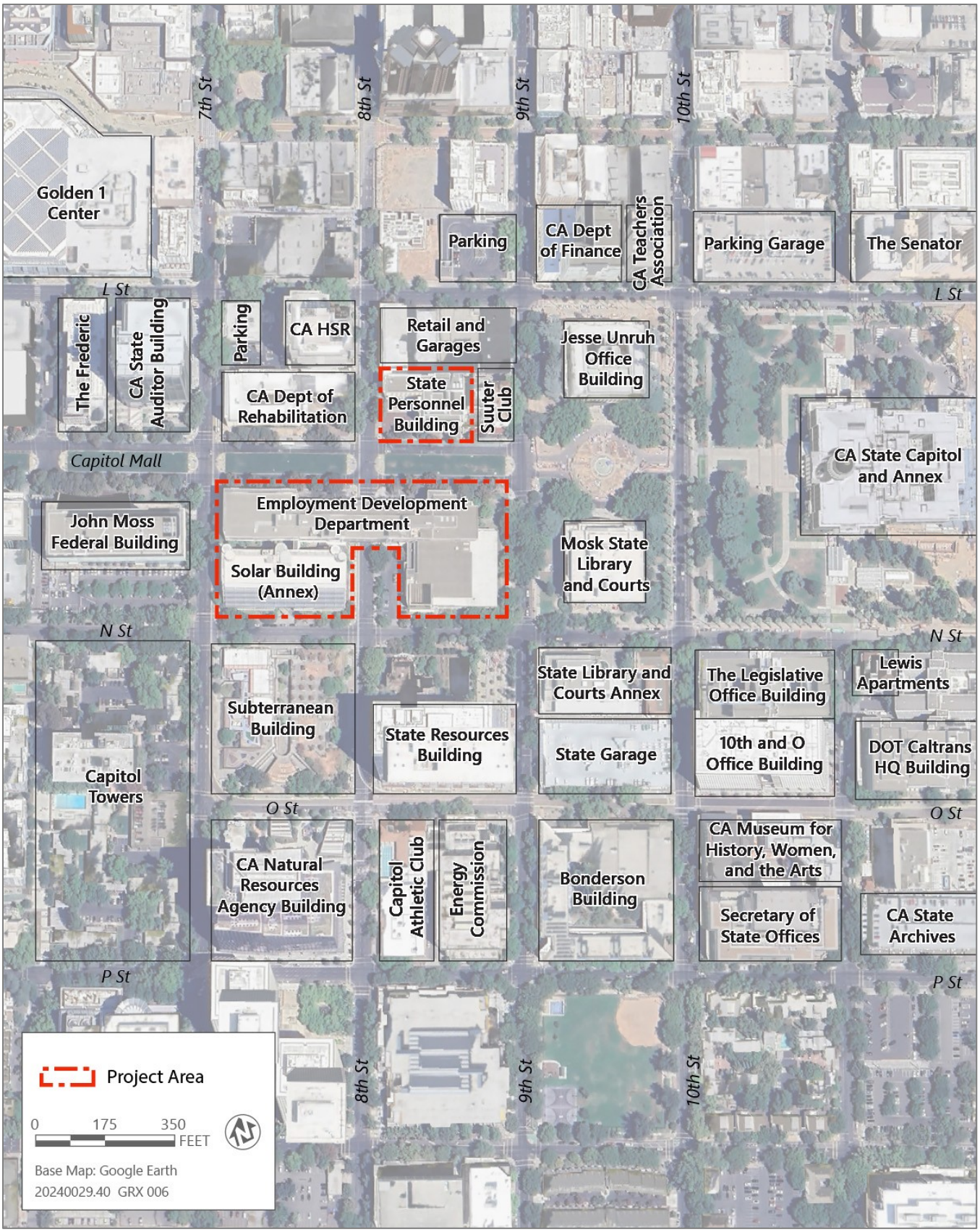
- support the State in removing underutilized property from its real estate portfolio;
- provide an opportunity for development of land uses on the subject parcels that integrate with the existing surroundings and take advantage of existing assets such as proximity to multiple transit modes (e.g., bus, light rail);
- support the opportunity to optimize the development potential on the project parcels while maintaining conformity with the Capitol View Protection Act;
- support the efficient use of State funds and resources; and
- allow for provision of facilities on the project parcels that meet current construction standards and codes.

3.3 PROJECT LOCATION

The project site contains three existing state-owned office buildings in downtown Sacramento, along Capitol Mall and N Street. Specifically, the EDD Headquarters is located at 800 Capitol Mall (this building has structures on both the 700 and 800 blocks of Capitol Mall but the address used for this EIR is 800 Capitol Mall); the EDD "Solar Building" Annex located at 751 N Street; and the State Personnel Board Building located at 801 Capitol Mall (see Figures 3-1 and 3-2).

The project site covers approximately 5.5 acres and is located within the Central Business District of the Central City Community Plan area and is designated by the Capitol Area Plan (CAP) Land Use Diagram and City of Sacramento as "office" (Accessor Parcel Numbers 006-0156-001, 006-0154-001, and 006-0155-011). The project site is zoned as Central Business District Zone with a Special Planning District overlay (C-3-SPD).

Land uses surrounding the building site include a number of other state-owned and private buildings: the EDD Annex "Subterranean Building" and the Stanford Mansion to the south across N Street and the Jesse Unruh Office Building and State Library and Courts Building to the east across 9th Street (Figure 3-3). Directly east of, and adjacent to the State Personnel Board Building is the Sutter Club Building, home of a private social club listed on the National Register of Historic Places. Directly north of the State Personnel Board Building, across the L Street Capitol Mall Alley, is a building containing retail, restaurant, office, and parking garage uses. To the west of the State Personnel Board



Source: Adapted by Ascent in 2026.

Figure 3-3 Project Area, Including Surrounding Land Uses

Building, across 8th Street, is the California Department of Rehabilitation Building. To the west of the EDD Headquarters Building and EDD "Solar Building" Annex, across 7th Street, is the John Moss Federal Building containing office space for multiple federal agencies. Within a three-block radius of the project site is broad mix of land uses, including the California State Capitol Building and Capitol Park; various State and private office buildings; high-, medium-, and low-rise apartment buildings; the Golden 1 Center; and the Downtown Commons district containing numerous retail and restaurant uses.

3.4 CHARACTERISTICS

There are three primary components of the proposed project: (1) demolition of the three existing buildings on the project site; (2) transfer of the state-owned property to another entity for redevelopment, which, for purposes of this EIR, is assumed to be CSU, and (3) future site development by that entity. As indicated above in the discussion of the project background, this EIR includes and evaluates a reuse scenario that is reflective of the land uses the University is considering for the downtown campus. Each of these project components is addressed below. However, as also stated previously, demolition of the existing structures would occur regardless of a future transfer of the property and is not contingent upon, or dependent on, subsequent development.

3.4.1 Building Demolition

The project would involve the demolition of three state-owned office buildings that have a combined gross floor area of approximately 729,700 square feet (sf), including approximately 479,300 sf at the EDD Headquarters at 800 Capitol Mall, approximately 166,000 sf at the EDD Solar Building Annex at 751 N Street, and approximately 84,400 sf at the State Personnel Board Building at 801 Capitol Mall.

It is not known at this time the order in which the buildings would be demolished. The demolition contractor, once selected, would develop a work plan and identify the sequencing of building abatement and demolition. However, because removal of hazardous materials (e.g., asbestos-containing materials, lead-based paints) must be completed prior to starting demolition, the process would start with the abatement of each building in turn.

Once abatement is complete on the first building, demolition of that building would begin. This sequence would continue, with the abatement contractor moving to the second building for abatement, and then the third building once abatement of the second building is complete. The demolition contractor would begin demolition of the second building after abatement is complete. The demolition process would end with the abatement and then demolition of the third building.

It is anticipated that abatement of the first building would begin in fall 2027 and it would take approximately 18 months to complete the abatement and demolition of all three buildings. However, prior to Fall 2027, activities may occur inside the buildings, such as disconnecting some utility services, to ready the buildings for abatement and demolition.

No staging areas have been identified at this time. This would be determined by the demolition contractor once selected. However, there is an existing parking area associated with the EDD Headquarters Building in the southwest corner of the block bounded by Capitol Mall, 8th Street, 9th Street, and N Street that may be used to support abatement and demolition activities. In addition, there is vacant office space in the Subterranean Building, directly across N Street from the Solar Building, which could be made available for project offices. Also, after the first or second building is removed, available space in those parcels could be used to support remaining abatement and demolition efforts.

Although there is no plan to achieve certification under the Leadership in Energy and Environmental Design (LEED) program for the building abatement and demolition, any activities that would generate LEED certification points would be recorded. Documentation supporting eligibility for LEED certification points would be provided to the land recipient to potentially support LEED certification for redevelopment activities.

It is estimated that abatement and demolition would generate approximately 140,815 cubic yards (cy) of material to be removed from the project site. A variety of trucks may be used to remove the material, but most are expected to either hold 20 cy of material (20-yard trucks), 40 cy of material (40-yard trucks), or a combined truck and trailer holding 60 cy of material. Based on past DGS demolition projects, 60 cy truck/trailer combinations are most frequently used. For this EIR, it is assumed that 70 percent of the truck trips removing material would be 60 cy truck/trailer combinations, 20 percent would be 40-yard trucks, and 10 percent would be 20-yard trucks. These assumptions result in approximately 3,051 truck trips leaving the project site to haul away demolition waste.

Non-hazardous demolition material is likely to be taken to the closest nearby landfills that already accept waste from the City of Sacramento, the L and D Landfill on Fruitridge Road in the City of Sacramento, and the Sacramento County Keifer Landfill in Sloughhouse (see Section 4.5, "Utilities and Service Systems," for more information). All hazardous materials would be taken to a facility authorized to accept these materials, and transported in compliance with all applicable laws and safety requirements. Local haul routes from the project site are expected to be the most efficient route to the north at the time of demolition to reach L Street, and then L Street to Interstate 5 (I-5) north, and the most efficient route to the south at the time of demolition to reach P Street, and then P Street to I-5 south and other freeways. See the Health Risk Assessment (HRA) provided in Appendix B for more information on anticipated haul routes.

A material recycling program would be implemented as part of building demolition; however, at this time, the specific types of materials that would be recycled and the potential volume of recycled materials are not known. It is likely that a large volume of concrete rubble would be taken to a local recycling facility to be ground and re-used. Rebar within the concrete rubble may also be recycled. All materials that are not recycled would be taken to a landfill.

After buildings have been removed, foundations, piles, and related underground elements would be left in place. Where building construction resulted in concrete slabs on the ground surface, if these "slab on grade" elements are not damaged during demolition, they would be left in place. Holes left by basements, elevator pits, and similar underground facilities would not be filled. Security fencing and any other security measures installed as part of the building abatement and demolition process to prevent public entry would be retained to prevent unauthorized entry to the parcels.

For a vast majority of renovation and demolition activities, City of Sacramento noise ordinance restrictions on the timing of construction activities would be followed (i.e., Monday through Saturday 7:00 a.m. to 6:00 p.m. and Sunday between 9:00 a.m. and 6:00 p.m.). However, there could be circumstances where nighttime activities would be required. One instance is the removal of the "sky bridge" portion of the EDD Headquarters Building that crosses over 8th Street. Nighttime work on this project element would minimize the period of time 8th Street would need to be closed during demolition, including during the busier daytime hours.

There would be three separate closures of 8th Street to all persons and vehicles, including light rail, to support the abatement and demolition of the sky bridge. The first closure would be for 48-72 hours to set up a scaffolding system under the sky bridge, and across 8th Street, to support the abatement and demolition process. Work would be continuous during this period, including at night. The scaffolding would be installed during a weekend when there are no events being held on Capitol Mall to implement the work during low traffic and low transit demand periods. Once the scaffolding is installed, 8th Street would be able to operate normally while the scaffolding is in place. Once the scaffolding is in place, abatement of the sky bridge would commence, and use of 8th Street would be unaffected. After abatement, the sky bridge would be demolished over a 3- to 5- day period (including a weekend) when no events were being held on Capitol Mall. Because closure of 8th Street between Capitol Mall and N Street would be required, demolition would be conducted continuously, day and night to complete the process as soon as possible. Once demolition is complete, 8th Street would be re-opened, but the scaffolding would remain in place. Removal of the scaffolding would require closure of 8th Street for 24-48 hours, during which time work would be continuous, and would occur over a weekend with no events being held on Capitol Mall. Once the scaffolding was removed, 8th Street would be reopened.

All underground utilities in the project parcels would be cut and capped, and may be removed. If there is a utility line or other utility infrastructure in the project parcels that serves other sites, service to those other sites would not be

interrupted. DGS would work with the utility provider to re-route facilities as needed to maintain service. A specific example would be Sacramento Municipal Utility District (SMUD) 12 kilovolt (kV) transformer vaults in all three buildings planned for demolition. The transformer vaults in the EDD Headquarters Building and the State Personnel Board Building also serve facilities and buildings beyond the project site. Therefore, DGS would coordinate with SMUD to ensure that electrical service to these offsite facilities and buildings would not be interrupted during the removal of these transformer vaults as part of the building abatement/demolition process.

An additional example of utility removal or abandonment would be steam and chilled water pipelines associated with the State Central Plant. The Central Plant, located at 620 P Street, provides chilled water for air conditioning and steam for heating to multiple State-owned buildings in the downtown area. The steam and chilled water are delivered via underground pipeline. The three buildings to be demolished as part of the proposed project are connected to this pipeline system, with pipelines also passing through the project site and connecting to other State buildings, such as the EDD Annex Subterranean Building. These pipelines would be removed from the project site as part of the demolition process and remaining pipes leading to the project site would be capped at an appropriate location near the project site boundary. For any delivery pipes that pass through the project site in order to serve other buildings, the pipes would be re-routed to provide uninterrupted steam and chilled water delivery to these buildings; or in the case of the Subterranean Building, this building would be entirely disconnected from the Central Plant system and connections to existing utility providers (e.g., SMUD) would be modified as necessary, as part of the proposed project, to provide continued heating and cooling service.

The abatement and demolition labor force would fluctuate depending on the phase of work. When project activity is limited to hazardous materials abatement on the first building (i.e., when abatement is the only activity and no demolition activities are underway), the workforce is estimated to be approximately 25 to 40 workers. During periods when abatement of one building and demolition of another building are occurring concurrently, the workforce is estimated to be 40 to 55 workers. At the end of the process, when the only project activity is the demolition of the last building, the workforce is estimated to be 15 to 25 workers.

During abatement and demolition, there would be periods during which pedestrian, bicycle, and vehicular movements around the site would be restricted or redirected to accommodate project activities and maintain public safety. Such restrictions could include lane closures, lane narrowing, and detours, which would be localized and temporary. However, it is assumed that abatement and demolition would avoid disturbance of light rail line operation, other than the closures of 8th Street required for demolition of the EDD Headquarters Building sky bridge (described above). Vehicular, pedestrian, and bicycle access to apartments, offices, and other buildings in the area would be maintained even if streets and sidewalks are temporarily blocked off. The project site is located within the downtown street grid, and there are various alternative routes available to access the project site and nearby locations if any streets or sidewalks in the immediate project vicinity are closed.

DGS would prepare a construction traffic control plan, consistent with Section 12.20.20 of the Sacramento City Code, that illustrates the location of the proposed work areas; identifies the location of areas where the public right-of-way would be closed or obstructed and the placement of traffic control devices necessary to perform the work; shows the proposed phases of traffic control; and identifies the time periods when the traffic control would be in effect and the time periods when work would prohibit access to private property from a public right-of-way. Elements of the plan applicable to areas under the City's jurisdiction may be modified by the City at any time to eliminate or avoid traffic conditions that are hazardous to the safety of the public. The traffic control plan would also provide information on access for emergency vehicles to prevent interference with emergency response.

Equipment anticipated to be used throughout the various phases of abatement and demolition includes the following:

- bobcats,
- boom lift,
- compressor,
- concrete/industrial saw,
- crane,
- excavators,
- forklift,
- generator set,
- grader,
- haul trucks,
- man-lift,
- off-highway trucks,
- rubber tired or track dozer,
- scissor lift,
- scraper, and
- tractors/loaders/backhoes.

Where feasible and available, diesel equipment would be powered by Tier 3 or Tier 4 engines as designated by the California Air Resources Board (ARB) and the US Environmental Protection Agency (EPA). In addition, if available for on-site delivery, diesel equipment would be powered with renewable diesel fuel that is compliant with California's Low Carbon Fuel Standards and certified as renewable by the California ARB Executive Officer.

Measures would be implemented during demolition to prevent damage to the adjacent Sutter Club and other nearby fragile masonry buildings and site features, including ground vibration monitoring.

As stated previously, nighttime project work is anticipated for the removal of the EDD Headquarters Building Sky Bridge. There may be other occasions where nighttime work is required. A distinction is made between nighttime work indoors, within the building during abatement, and outdoor activities associated with building demolition. Indoor abatement activities would be permitted during nighttime hours. However, the selected demolition contractor would only be permitted to conduct outdoor activities during the nighttime hours if there are no other reasonable options.

3.4.2 Land Transfer

The land and facilities at 800 Capitol Mall, 801 Capitol Mall, and 751 N Street are owned by the State of California and managed by DGS. DGS's management authority over these properties is the basis for its role as CEQA lead agency for this EIR and for its responsibility for building demolition, including compliance with applicable legal and regulatory requirements associated with the demolition process. However, once DGS transfers these properties to another entity, it also relinquishes all responsibilities and authority over the properties and has no jurisdiction over how the properties are used. This is true even if the land recipient is another State agency, such as CSU. While this EIR evaluates a potential reuse scenario (see below) to disclose to DGS and the public the reasonably foreseeable direct and indirect effects of building demolition and land transfer, DGS will have no influence on any future use or redevelopment proposal for the properties once the land transfer is complete.

3.4.3 Future Site Development

Upon completion of demolition, the site is intended to be ready for construction of future uses. DGS has been in discussions with Sacramento State, granting it a period of exclusivity to evaluate the redevelopment potential of the site. DGS may, but has not formally committed to ultimately transferring the site to CSU for use by Sacramento State. In collaboration with Sacramento State and CSU, a development scenario has been crafted that reflects the variety of uses the University is considering for the downtown campus, consisting of:

- School of Public Affairs,
- student housing,
- conference and event center,
- innovation center and additional academic or cultural uses,
- hotel,
- indoor performing arts and music venue,
- market rate housing apartments,
- ground floor retail,
- commercial office space, and
- structured parking.

All proposed structures would be required to comply with the Capitol View Protection Act (Government Code Section 8162 et seq.) of 1992. The law was established to provide protection of views to and from the State Capitol building and Capitol Park, to maintain the visual prominence of the Capitol by setting height restrictions in zones surrounding the Capitol building, and to maintain the existing urban edge of surrounding streets with setback requirements. In accordance with the Act's height restriction map, the project site is located within the 150-foot, 300-foot, and 400-foot height limit zones. These height limits equate to buildings of a maximum of roughly 12 stories, 24 stories, and 33 stories respectively. The specified height limit does not apply to decorative building caps or rooftop mechanical equipment that is screened and placed in the farthest possible location when viewed from the State Capitol or Capitol Park. The site design and building construction materials would be consistent with those used for similar high-quality civic buildings in prominent urban environments.

POTENTIAL FUTURE USES

The project includes a mix of academic, residential, hospitality, commercial, entertainment, parking, and related uses with a total development program anticipated to comprise approximately 3,630,000 gross square feet (GSF) at full buildout. Development of the project site is anticipated to occur in multiple phases over time. Pending future development, portions of the site that remain undeveloped may accommodate interim uses, which could include construction staging, paved surface parking, special events, concerts, farmers markets, pop-up retail markets, shipping-container-based retail and food vendor markets, and similar temporary activities.

Table 3-1 summarizes proposed land uses and associated gross square footage.

Table 3-1 Proposed Future Development Land Uses

Future Land Use	Approximate Gross Square Feet (GSF)	Notes
School of Public Affairs (including Innovation Center and other academic or cultural uses)	320,000	Serving approximately 5,000 combined students, faculty, and staff
Student Housing	721,000	500 Units at 917 sf per unit plus 10,000 sf of amenity space
Conference and Event Center	85,000	Maximum occupancy of approximately 2,000 persons
Hotel	335,000	250 guest rooms
Indoor Performing Arts and Music Venue	250,000	Available to accommodate a variety of event types and seating/viewing configurations
Market Rate Housing Apartments	1,012,000	750 units at 850 sf per unit plus 20,000 sf of amenity space
Retail and Office		
Ground Floor Retail	147,000	Located along street-facing building frontages throughout the project site
Commercial Office	760,000	—
Total	**3,630,000**	

Source: CSU Sacramento State 2026, compiled by Ascent in 2026.

School of Public Affairs

The project includes development of a new academic complex consisting of an approximately 320,000-GSF School of Public Affairs building. The facilities would accommodate classrooms, lecture halls, faculty offices, and associated academic support spaces. The project is assumed to serve approximately 5,000 combined students, faculty, and staff.

Innovation Center and Other Academic or Cultural Uses

As part of the School of Public Affairs, the project includes development of research, training, and innovation facilities that would accommodate approximately 5,000 combined students, faculty, and staff. The facilities may be developed through a public-private partnership and could include office, research, collaboration, training, and related support spaces. Potential activities may include the development and application of technologies of the future, systems research and development, and educational or professional training programs related to technologies of the future.

Student Housing

The project includes development of student housing, including 500 apartment-style student housing units intended primarily for upper-division undergraduate and graduate students. The total area for student housing would encompass approximately 721,000 GSF and would consist predominantly of single-occupancy, one-bedroom units. Approximately 5 percent of units (roughly 25 units) would be available for spouses or families and may have two bedrooms. Typical single bedroom units will be approximately 917 sf, with larger units available for families. Approximately 10,000 sf of resident amenity space would be part of the student housing development. Each unit would include a kitchen; therefore, no dedicated food service facilities specifically serving the student housing are proposed as part of the project.

Conference and Event Center

The project includes development of an approximate 85,000 GSF conference and event center designed to accommodate a variety of meeting, conference, and gathering functions. The facility would include kitchen and food service areas, as well as both indoor and outdoor event spaces. The conference center would be available for use by the campus community and could also be rented by members of the general public for private and public events. The facility would accommodate a maximum occupancy of approximately 2,000 persons.

At this time, it is assumed that the conference and event center would be in use approximately 335 days a year, with the center at full, or near full capacity roughly 25 days a year.

Hotel

The project includes development of an approximate 335,000 GSF hotel consisting of 250 guest rooms. Each guest room would be approximately 750 sf, and approximately 30,000 sf of lobby, amenities, and common areas would be included. The facility would provide typical hotel guest amenities, which may include a fitness center, business center, meeting and event spaces, and other guest-serving facilities and support functions. The hotel would accommodate overnight visitors and other campus- and community-related guests.

Indoor Performing Arts and Music Venue

The project proposes development of an approximately 250,000 GSF indoor performing arts and music venue designed to accommodate a range of cultural, entertainment, and community events. Potential uses may include live music performances, concerts, theatrical productions, and other performing arts programming, as well as related indoor entertainment and community gatherings. The venue may also support recreational or sports-related programming, including training and exhibition events related to mixed-martial arts, Jujitsu, and other sports programs.

The facility may include flexible ground-floor event space, potentially with permanent seating, and could incorporate restaurant, food service, retail, or other visitor-serving uses on mezzanine or upper levels. Conceptual design considerations include operable doors or similar architectural features that could open the venue to adjacent sidewalks and streets, creating opportunities for indoor-outdoor connectivity and potential integration with events and programming along Capitol Mall.

Maximum occupancies for standing room events, seated events, and other event configurations (e.g., sporting events) have not yet been determined and are currently under development. However, it is assumed that the venue will support some type of use roughly 260 days a year, with the venue at full, or near full capacity roughly 12 days a year. Events, particularly larger events, would typically occur on weekends.

Market Rate Housing Apartments

The project includes development of approximately 1,012,000 GSF of apartment space that would include up to 750 market-rate residential apartment units, accommodating approximately 2,000 residents. While the specific unit configuration is yet to be determined, it is assumed that a majority of units would be studios and one-bedrooms, with a small amount of multi-bedroom units also available. The project would also include approximately 20,000 sf of resident amenity space. The proposed apartments could be located within a single building within the project site or may include distribution across multiple buildings depending on final site planning and design considerations.

Ground Floor Retail and Commercial Office Space

The project includes approximately 147,000 GSF of ground-floor retail and 760,000 GSF of commercial office space. Ground floor retail would be located along street-facing building frontages throughout the project site. This ground floor street/sidewalk facing space is intended to support a mix of retail, restaurant, service, entertainment, and other active pedestrian-oriented uses that contribute to the vitality of the surrounding area. The office space could be located in a single building, or distributed across multiple buildings depending on final site planning and design considerations.

Structured Parking

The project proposal includes structured parking intended to serve the hotel, market-rate residential housing, retail, office, and student housing components of the project. Parking would be available to residents, guests, employees, and visitors associated with these uses and members of the general public. The structured parking may be constructed below proposed site buildings and may also be incorporated into the lower floors of some buildings.

The number of parking spaces to be provided has not yet been determined. As a development proposed by CSU, which is the State of California acting in its higher education capacity, the project is not subject to the parking requirements of the City of Sacramento, but would be subject to CSU policies regarding the construction of new parking facilities. The final parking supply would be determined through subsequent project planning, design, and operational analyses.

UTILITIES

Water

Water supply connections would continue from the existing City of Sacramento pipelines serving the current State office buildings on the project site. Given the amount and type of planned future development relative to the existing office buildings, water demand would be substantially higher under the proposed future site development scenario. Therefore, it is anticipated that larger, and potentially additional water lines connecting the buildings to the City pipelines would need to be installed to meet anticipated demand and comply with applicable building codes. New water lines may follow the alignments of existing water lines, or new alignments may be needed.

If the land recipient is CSU/Sacramento State, that agency's Sustainability Policy requires water conservation measures that reduce consumption by ten percent by 2030 in comparison to a 2019 baseline, consistent with Assembly Bill 1668 (California Water Code Section 10609). All plumbing fixtures in the building would be low-flow/high-efficiency fixtures. Additionally, any new landscaping would include drought-tolerant planting as another water-saving design measure of the project.

Fire protection for the new development would comply with the California code for high-rise buildings and the City of Sacramento High-Rise Ordinance (as determined to be applicable by the State Fire Marshall), including fire pumps tied to a fire water storage tank, a sprinkler system throughout the building, and breathing air systems provided in the building.

Wastewater

Connections to the City's Combined Sewer System (CSS) would be made at the existing CSS mains currently serving the project site. Given the amount and type of planned future development relative to the existing office buildings, wastewater generation would be substantially higher under the proposed future site development scenario. Therefore, it is anticipated that larger, and potentially additional, wastewater conveyance pipelines connecting the buildings to the CSS would need to be installed to meet anticipated demand and comply with applicable building codes. New wastewater lines may follow the alignments of existing wastewater lines, or new alignments may be needed. Sewer cleanouts would be installed at the point of service.

The CSS in downtown Sacramento transports both rainwater and stormwater to the Sacramento Area Sewer District (SacSewer) EchoWater Resource Recovery Facility (EchoWater Facility) for treatment before discharge to the Sacramento River.

Stormwater and Drainage

The existing stormwater/drainage features on the site and connections to the CSS would be maintained, with upgrades installed as needed per code and project requirements (e.g., amount of impermeable surface area on the project site). Stormwater is generated by rainfall and is influenced by the footprint of impermeable surface at a site. The height of buildings or other facilities creating the impermeable surface has little effect on stormwater volumes. Therefore, upgrades to existing stormwater conveyance infrastructure may not be required to support planned future development.

Electricity Service

Electrical service to the existing State office buildings on the project site is provided by SMUD. SMUD would also be the electrical utility provider for any new development on the project site. As stated previously, there are currently SMUD 12 kV transformer vaults in all three existing state office buildings. These transformer vaults would be removed as part of the building abatement/demolition process. At the time of land transfer, there would be little to no electrical service infrastructure on the project site.

There are multiple elements of SMUD electrical service infrastructure near the project site that could be part of a system providing electrical service to new development, including underground infrastructure/circuits along 9th Street, Capitol Mall, 8th Street, and the alley behind the EDD Solar Building. CSU/Sacramento State (or whichever entity receives the property and undertakes redevelopment) would coordinate with SMUD to both prevent damage to existing electrical infrastructure near the project site during redevelopment, and to install any new infrastructure or infrastructure improvements needed to provide electrical service to future development.

Given the amount and type of planned future development relative to the existing office buildings, electrical demand would be substantially higher under the proposed future site development scenario. In addition, currently heating and cooling for the three State office buildings is provided by steam and chilled water provided by the State's Central Plant (see discussion of the Central Plant in the Building Demolition section above). It is assumed that air conditioning at the new development would be powered by electricity provided by SMUD. Heating would likely be provided by electricity, with natural gas delivered by the Pacific Gas & Electric Company (PG&E) only supporting specialized demands such as restaurant kitchens and teaching labs. Therefore, electrical demand for planned future development would be substantially higher than for the three existing office buildings. It is assumed that electrical infrastructure improvements would be required to provide electrical service to the planned future development and these improvements would be identified and implemented through coordination with SMUD.

Natural Gas

There is little to no demand for, or use of, natural gas in the three existing State office buildings on the project site due to interior heating being provided by steam delivered via pipeline from the State's Central Plant (see discussion of the Central Plant in the Building Demolition section above). Heating and cooling services from the Central Plant will not be provided to new development on the project site. Heating in the new development is expected to be provided with electricity (i.e., electrical heat pumps). It is assumed that at least some kitchens associated with residential and commercial development on the project site will utilize natural gas. Natural gas may also support some specialized academic uses, such as labs. Natural gas service from PG&E is available in the project area and it is assumed that existing delivery infrastructure will be connected to provide natural gas, as needed, to proposed future development.

3.5 POTENTIAL PERMITS AND APPROVALS REQUIRED

For the purposes of CEQA, the term "Responsible Agency" includes all public agencies other than the Lead Agency that have discretionary approval power over the project (CEQA Guidelines Section 15381). Discretionary approval power may include such actions as issuance of a permit, authorization, or easement needed to complete some element(s) of the proposed project. It is anticipated that approval from various City of Sacramento departments would be required to complete planned building demolition, removal of demolished building materials, utility modification or abandonment in City streets, and similar activities. Where City approval may constitute a discretionary decision, it is expected that the City would use the EIR for the Capitol Mall Office Buildings Demolition Project to support these decisions. It is anticipated that building demolition would also require consultation with and concurrence from the State Historic Preservation Officer regarding historical significance and impacts of proposed redevelopment. Other agencies whose approval may be required for the project include but may not be limited to the Central Valley Regional Water Quality Control Board, California Department of Transportation, Sacramento Metropolitan Air Quality Management District, and Sacramento Municipal Utility District.

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4 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

4.1 APPROACH TO THE ENVIRONMENTAL ANALYSIS

This Draft EIR evaluates and discloses the environmental impacts associated with the Capitol Mall Office Buildings Demolition Project, in accordance with CEQA (Public Resources Code [PRC] Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations [CCR] Title 14, Chapter 3, Section 15000 et seq.).

Sections 4.2 through 4.17 present a discussion of regulatory setting, environmental setting, environmental impacts associated with implementation and operation of the project, mitigation measures to reduce the level of significant and potentially significant impacts, and residual level of significance (i.e., after application of mitigation, including impacts that would remain significant and unavoidable after application of all feasible mitigation measures). Issues evaluated in these sections consist of the environmental topics identified for review in the notice of preparation (NOP) (see Appendix A). Chapter 5, "Cumulative Impacts," presents an analysis of the project's impacts considered together with other past, present, and probable future projects producing related impacts, as required by Section 15130 of the State CEQA Guidelines. Chapter 6, "Other CEQA Sections," includes an analysis of the project's growth-inducing impacts, as required by Section 21100(b)(5) of CEQA. Chapter 7, "Alternatives," presents a reasonable range of alternatives and evaluates the environmental effects of those alternatives relative to the proposed project, as required by Section 15126.6 of the State CEQA Guidelines.

Sections 4.2 through 4.17 of this Draft EIR each include the following components:

- Regulatory Setting: This subsection presents information on the laws, regulations, plans, and policies that relate to the issue area being discussed. Regulations originating from the federal, State, and local levels are each discussed as appropriate.
- Environmental Setting: This subsection presents the existing environmental conditions on the project site and in the surrounding area as appropriate, in accordance with State CEQA Guidelines Section 15125. The discussions of the environmental setting focus on information relevant to the issue under evaluation. The extent of the environmental setting area evaluated (the project study area) differs among resources, depending on the locations where impacts would be expected. For example, the environmental setting for noise describes conditions in the area where noise from project demolition/construction and operation could be heard, whereas the environmental setting for geology and soils extends well beyond the project site as seismic events from faults miles from the project site could affect project facilities.
- Environmental Impacts and Mitigation Measures: This subsection presents thresholds of significance and discusses the potentially significant effects of the Capitol Mall Office Buildings Project on the existing environment, including the environment beyond the project boundaries, in accordance with State CEQA Guidelines Section 15126.2. The methodology for impact analysis is described in each section, including technical studies upon which the analyses rely. The thresholds of significance are defined, and the thresholds for which the project would have no impact are disclosed and dismissed from further evaluation. Project impacts are numbered sequentially in each subsection (Impact 4.2-1, Impact 4.2-2, Impact 4.2-3, etc.). A summary impact statement precedes a more detailed discussion of each environmental impact. The discussion includes the analysis, rationale, and substantial evidence upon which conclusions are drawn. The determination of the level of significance of each impact is presented in bold text. An impact would be "less than significant" if no substantial adverse change in the physical environment would occur. An impact would be "significant" or "potentially significant" if a substantial adverse change in the physical environment would, or potentially would occur; both are treated the same under CEQA in terms of procedural requirements and the need to identify feasible mitigation.

  Mitigation measures are identified, as feasible, to avoid, minimize, rectify, reduce, or compensate for significant or potentially significant impacts, in accordance with State CEQA Guidelines Section 15126.4. CEQA prohibits lead

agencies from approving projects for which an EIR has identified significant effects unless the agency makes written findings about the disposition of those effects, specifically pertaining to application of mitigation measures (PRC Section 21081, CCR Section 15091).

The possible findings are:

1) Changes 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.

2) 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.

3) 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 final EIR.

As described in Section 3.4.2, "Land Transfer," this EIR evaluates at a project level the nearer-term demolition activity to be undertaken by DGS as lead agency and at a programmatic level the potential later, post-demolition construction and operation of Sacramento State campus uses reasonably expected to arise from the proposed demolition action. While post-demolition uses are expected to be evaluated in greater detail in a future CEQA document with CSU serving as lead agency (if CSU is the land recipient), this EIR nonetheless includes mitigation for all identified significant effects—whether direct (i.e., from demolition), indirect (i.e., a reasonably foreseeable outcome from land transfer), or cumulative.

Therefore, mitigation measures are written to be implemented or overseen by DGS, a future land recipient such as CSU, or both, depending upon whether they apply to the demolition or post-demolition construction and operation. It is anticipated that DGS would making Finding #1 (as shown above) for significant effects for which it would implement or oversee mitigation measures. However, as identified in Section 3.4.2, "Land Transfer," once DGS transfers these properties to another entity, it also relinquishes all responsibilities and authority over the properties and has no jurisdiction over how the properties are used. This is true even if the land recipient is another State agency, such as CSU. Therefore, DGS, in accordance with CEQA, includes feasible mitigation measures for potential future impacts, but cannot enforce the adoption or implementation of mitigation measures by future land recipients. Therefore, it is anticipated that DGS would make Finding #2 for significant effects for which mitigation measures would be implemented by a future land recipient (e.g., CSU). It is likely that future landowners would adopt and implement either similar, more stringent, or different mitigation measures based on conditions at the time of preparation of the future CEQA document and the specific redevelopment activity being evaluated.

Where an existing law, regulation, or permit specifies mandatory and prescriptive actions about how to fulfill the regulatory requirement, leaving little discretion in its implementation, and would avoid an impact or maintain it at a less-than-significant level, the environmental protection afforded by the regulation is considered before the impact significance is determined. Where existing laws or regulations specify a mandatory permit process for future projects, performance standards without prescriptive actions to accomplish them, or other requirements that allow substantial discretion in how they are accomplished, or they have a substantial compensatory component, the level of significance is determined before the influence of the regulatory requirements is applied. In this circumstance, the impact would be potentially significant or significant, and the regulatory requirements would be included as a mitigation measure.

This subsection also describes whether mitigation measures would reduce project impacts to less-than-significant levels. Significant and unavoidable impacts (i.e., significant impacts that cannot be reduced to a less-than-significant level with feasible mitigation) are identified as appropriate in accordance with State CEQA Guidelines Section 15126.2(c). Significant and unavoidable impacts are also summarized in Chapter 6, "Other CEQA Sections."

The full references associated with the parenthetical citations found throughout Chapters 1 through 7 are presented in Chapter 8, "References," which is organized by chapter and technical section number.

4.1.1 Effects Found Not to Be Significant

It has been determined that implementing the Capitol Mall Office Buildings Demolition Project would not significantly affect some environmental resource topics. Under the CEQA statutes and the State CEQA Guidelines, a lead agency may limit an EIR's discussion of environmental effects when such effects are not considered potentially significant (PRC Section 21002.1[e]; State CEQA Guidelines Sections 15128, 15143). Information used to determine which impacts would be potentially significant was derived from review of the proposed project, review of applicable planning documents and CEQA documentation, fieldwork, feedback from public and agency consultation, and comments received on the NOP (see Appendix A). Discussions of the project effects found not to be significant are presented below.

AGRICULTURAL AND FORESTRY RESOURCES

The project is located in the urban environment of downtown Sacramento and involves demolition of existing office buildings and redevelopment of new buildings and facilities at the same location. Surrounding land uses include a number of other state-owned and private buildings such as the EDD Annex "Subterranean Building;" the Stanford Mansion; the Jesse Unruh Office Building and State Library and Courts Building; the Sutter Club Building; and a private building containing retail, restaurant, office, and parking garage uses. As identified on the Sacramento County Important Farmland map (California Department of Conservation 2017), all of downtown Sacramento is identified as "Urban and Built-Up Land." No farmland designated agricultural uses, Williamson Act contracted lands, or forestry resources are located on the project site or in the vicinity. Impacts related to landscaping, including trees on and adjacent to the project site, are discussed in Section 4.15, "Biological Resources." The project would have no impact on agricultural or forestry resources. This topic is not discussed further in this EIR.

MINERAL RESOURCES

Historic mineral production in the Sacramento region has included construction aggregate, kaolin clay, common clay, pumice, and gold. However, according to the Mineral Land Classification Map of Sacramento County, the project area is designated as MRZ-1, or an area with no significant mineral deposits (California Division of Mines and Geology 1999). Implementation of the project would not result in the loss of any known mineral resources, and no impact would occur. This issue is not discussed further in this EIR.

WILDFIRE

The project site and surrounding land uses are not located in a state responsibility area. Because the project site is located in a highly urbanized setting and the site is served by the Sacramento Fire Department, the risk of wildfire is very low. This issue is not discussed further in this EIR.

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4.2 LAND USE AND PLANNING

This land-use analysis evaluates consistency of the Capitol Mall Office Buildings Demolition Project with applicable land-use plans and policies. The physical environmental effects associated with the project, many of which pertain to issues of land use compatibility (e.g., noise, aesthetics, air quality), are evaluated in other sections of Chapter 4 of this Draft EIR.

One comment letter regarding land use and planning was received in response to the Notice of Preparation (see Appendix A). The Sacramento Metropolitan Air Quality Management District expressed concerns related to whether the project would be consistent with applicable local plans and policies related to adaptive reuse and existing structure preservation (e.g., Policy LU.1.3 for Adaptive Reuse in Sacramento's Central City Specific Plan, and Policy LUP-10.1 for Existing Structure Reuse in the City of Sacramento 2040 General Plan). As described below, although the project is located within the City of Sacramento, DGS, as a State agency, is not subject to local land use plans, policies, or zoning regulations. Nevertheless, this EIR considers relevant City plans and policies, including those related to adaptive reuse and preservation of existing structures, to inform the environmental analysis, evaluate potential land use conflicts, support coordination with local agencies, and provide information relevant to future City permit approvals. Also, adaptive reuse of the existing structures is addressed in Chapter 7, "Alternatives."

4.2.1 Regulatory Setting

FEDERAL

No federal plans, policies, regulations, or laws related to land use are applicable to the project.

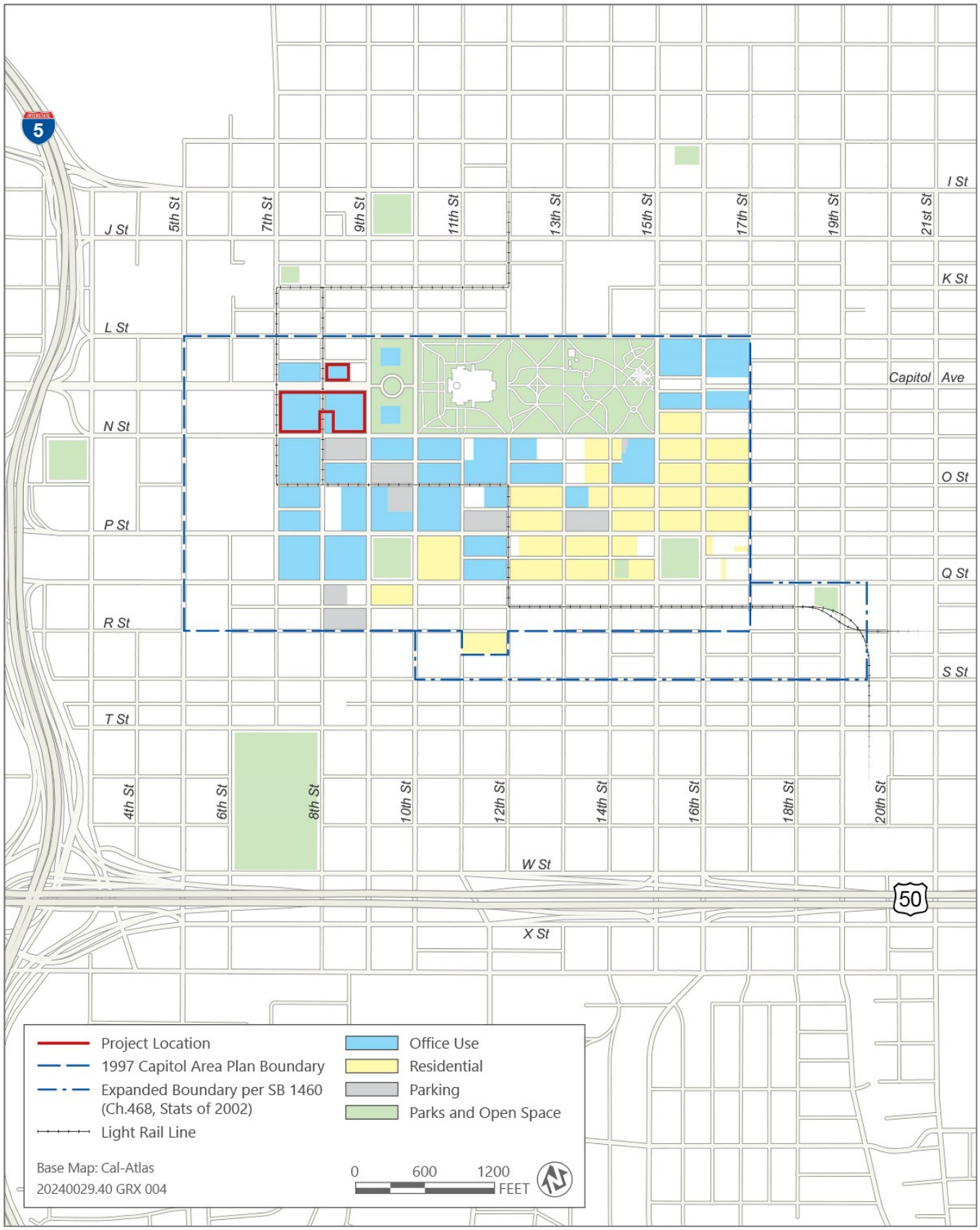
STATE

Capitol Area Plan

The Capitol Area Plan (CAP), originally adopted in 1977 and updated in 1997, is the statutory master plan for development on State-owned land surrounding the State Capitol, in accordance with Government Code Section 8160 et seq. The CAP envisions State offices, housing, neighborhood commercial, parking, and multimodal streets creating a vibrant urban district in the heart of Sacramento. The California Department of General Services (DGS) developed the CAP and is responsible for its administration. Additionally, as part of the CAP, DGS was also designated the responsibility for implementation of the office and parking elements of the plan (DGS 1997a). DGS implements the office and parking elements of the CAP and the Capitol Area Development Authority (CADA), a joint powers authority between the State of California and the City of Sacramento, implements the housing and retail elements.

The CAP area is bounded by 5th Street on the west, 17th Street on the east, L Street on the north, R Street on the south, and an additional half-block area that lies south of R Street between 11th and 12th Streets (Figure 4.2-1). Senate Bill (SB) 1460 was passed by the California Legislature and signed by the Governor in 2002, which resulted in the addition of several blocks to the plan area along R Street. The land use designations of the CAP were not altered by the expansion, however, because no State-owned land lies within the added area.

The State-owned Employment Development Department (EDD) Headquarters Building at 800 Capitol Mall, the EDD "Solar Building" Annex at 751 N Street, and the State Personnel Board Building at 801 Capitol Mall are designated by the CAP Land Use Diagram as "office" and are currently managed by DGS. This area is designated for state offices, and limited support facilities such as parking, childcare, and ground-floor support commercial uses where appropriate. Residential uses are not incorporated into office development sites (DGS 1997a).



Source: Adapted by Ascent in 2026.

Figure 4.2-1 Capitol Area Plan Land Use Diagram

Statutory Objectives

The statutory objectives of the CAP are:

- **Land Use.** To establish patterns of land use in the Capitol Area which are responsive to the goals of the Capitol Area Plan, which provide for flexibility in meeting future State needs, and which protect the State's long-term interest without inhibiting the development process.
- **State Offices.** To provide offices and related services to meet present and future space requirements for the State of California near the State Capitol and in the context of metropolitan Sacramento, in the most cost-effective manner.
- **Housing.** To foster housing within the Capitol Area meeting a wide range of income levels and restoring the area to a population consistent with its urban surroundings.
- **Transportation and Parking.** To develop strategies, patterns and systems of movement into and within the Capitol Area that would provide adequate mobility for people that would provide adequate parking and that would enhance the area's environment.
- **Open Space and Public Amenities.** To develop within the Capitol Area a network of attractive and convenient open spaces and access routes to improve the environment for workers, residents and visitors, and to encourage a favorable response to alternatives for moving within and using the resources of the Capitol Area.
- **Development of the Community.** To stimulate the development of a community within the Capitol Area which is attractive and comfortable to work in, live in, and visit, which is integrated into the fabric of the rest of the City of Sacramento, and which is physically and economically viable over the long term.
- **Energy Conservation.** To assure that the evolution and the development of the Capitol Area accomplishes an increase in the intelligent and efficient use of energy resources within the scope of State operations in metropolitan Sacramento.
- **State's Relation to Local Government.** To assure the integration of planning and development efforts in the Capitol Area with the activities of all appropriate local governmental agencies.
- **Administration and Implementation.** To assure the effective implementation of the plan, by providing effective development mechanisms, by maintaining communications and coordination with all agencies and constituencies, and by updating the plan as needed.

Plan Purposes

The CAP includes the following purposes:

- to continue development of the Capitol Area as a mixed-use community;
- to offer opportunity sites for office, housing, and commercial development, consistent with the established development patterns in the area;
- to maintain and enhance the historic prominence of State government in the area, consistent with the State's emphasis on office space consolidation;
- to provide for stately, appropriate development at the east end of Capitol Park that complements the west end setting;
- to plan for appropriate utilization of State-owned real estate assets; and
- to use a transit system significantly expanded in the Capitol Area since the development of the 1977 plan.

Capitol Area Plan Implementation Program

The Capitol Area Plan Implementation Program is an accompanying document that identifies recommended actions for carrying out the CAP objectives and principles. The implementation program document identifies specific actions to be taken by DGS, CADA, or other agencies; identifies standards for facilities and services; and provides guidance for monitoring the ongoing progress of implementation. The CAP Implementation Program may be revised periodically to reflect newly identified tasks, to report on completed tasks, or to identify emerging priority action items (DGS 1997b). The CAP Implementation Program did not identify development guidelines for the project site.

2021 California Five-Year Infrastructure Plan

The 2021 California Five-Year Infrastructure Plan is the Governor's proposal for investment in State infrastructure, prepared and submitted for consideration with the annual budget bill. The plan identified significant challenges with aging facilities, deferred maintenance, and increasing climate-related risks affecting transportation systems, state buildings, and natural resource assets. The plan proposed a budget of $1.6 billion for DGS for the renovation of six state office buildings and two property acquisitions; however, the specific buildings and property acquisitions were not identified in the plan (California Budget 2021).

Capitol View Protection Act

The Capitol View Protection Act (Government Code Section 8162 et seq.) was enacted in 1992 to maintain the visual prominence of the State Capitol by setting height restrictions in zones surrounding the Capitol building, and to maintain the existing urban edge of surrounding streets by requiring certain building setbacks (California Office of Historic Preservation 2005). For more details and a figure showing the relevant height restrictions in the project area, see Section 4.17, "Aesthetics, Light, and Glare," and Figure 4.17-1.

LOCAL

The Capitol Mall Office Buildings Demolition Project is located on State-owned property and has been authorized, funded, and would be implemented by DGS. State agencies are not subject to most local or county land use plans, policies, and zoning regulations.

Under CEQA, an EIR must consider the extent to which a project is inconsistent with "applicable general plans" (State CEQA Guidelines Section 15125[d]). The project is located in the city of Sacramento, but because DGS is a State agency that is not subject to local land use regulations, City-adopted land use plans, policies, and regulations are not applicable to the project. In addition, subsequent development is presumed to be undertaken by the California State University Sacramento (Sacramento State), another State agency that also would not be subject to local regulations, plans, and policies. For this reason, this EIR need not, as a matter of law, consider such plans, policies, and regulations. Nevertheless, in the exercise of its discretion, DGS, as lead agency for this EIR, does reference, describe, and address local land use plans, policies, and regulations that are applicable to the Capitol Mall Office Buildings Demolition Project. DGS takes this approach for several reasons. First, DGS recognizes that such plans, policies, and regulations reflect the local agency's policy decisions with respect to appropriate uses of land in the area. Consideration of these plans, policies, and regulations will therefore assist DGS in determining whether the proposed project may conflict with nearby land uses that could result in potentially significant environmental impacts. Second, the consideration of City plans, policies, and regulations is consistent with Government Code Section 8162, which directs DGS to cooperate with City and County officials in connection with implementation of the Capitol Area Plan (see also Government Code Section 8163, subd. [a][2], directing DGS to take into consideration local "ordinances, plans, requirements and proposed improvements"). Finally, the project would require sidewalk, roadway, and alley encroachment permits, and permits for connections to City operated utilities (see Streets and Highways Code Section 8300 et seq.). By considering consistency of the project with relevant City of Sacramento planning documents, this EIR will provide the City with the information necessary to make the consistency determination related to required encroachment and utility permits. Relevant regional level planning documents are also considered where they contribute to the evaluation and understanding of project effects.

The 2025 Blueprint

The 2025 Blueprint, previously known as the Sacramento Region Blueprint, is a transportation and land-use study that was initiated by the Sacramento Area Council of Governments (SACOG) Board of Directors in 2002 to determine alternatives to current and general planned transportation and land-use patterns. The Sacramento Region is defined for the purposes of SACOG and the Blueprint as including El Dorado and Placer Counties (minus the Tahoe area) and Sacramento, Sutter, Yolo, and Yuba Counties. In December 2004, the SACOG Board of Directors adopted the Preferred Blueprint Scenario, a vision for growth that promotes compact, mixed-use development and more transit choices as an alternative to low-density development. The 2025 Blueprint Plan was approved in November 2025. The 2025 Blueprint depicts a path to regional growth through the year 2050 that is generally consistent with principles of "smart growth," which encourage a variety of housing close to employment, shopping, and entertainment and provide options for walking, biking, or taking public transit (SACOG 2025).

The following Blueprint Growth Principles may be relevant to the analysis of land use effects:

- Vibrant-1: Provide incentives, information, tools, technical assistance, and encouragement for legislative and regulatory reform and investment in Center & Corridor and Established Communities that increase housing options, jobs and services, and access to amenities.
- Vibrant-8: Encourage growth in industries that will grow the region's economy, such as business services, agriculture, manufacturing, and research, by supporting economic development efforts and strategies that boost economic mobility.

2020 Metropolitan Transportation Plan/Sustainable Communities Strategy

The 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (2020 MTP/SCS) is a long-range plan for transportation in the region following SACOG's adoption of the Blueprint. The 2020 MTP/SCS covers the period from 2020 to 2040. SACOG is required by federal law to update the MTP at least every 4 years. SACOG uses the 2020 MTP/SCS to identify, in collaboration with cities, counties, and transit agencies, near-term (20 years) growth and transportation investment priorities. The City of Sacramento, as well as the other cities and counties in the region, has been updating its general plan and development code to allow and encourage Blueprint-friendly development and transit districts (SACOG 2019).

The priority policy areas from the 2020 MTP/SCS, adopted by SACOG, are:

- build vibrant places for today's and tomorrow's residents,
- foster the next generation of mobility solutions,
- modernize the way we pay for transportation infrastructure, and
- build and maintain a safe, reliable, and multimodal transportation system.

City of Sacramento 2040 General Plan

The Capitol Mall Office Buildings Demolition Project is located within the plan area of the Sacramento 2040 General Plan, which was adopted on February 27, 2024. The General Plan is a 20-year policy guide for the physical, economic, and environmental growth and renewal of the city, and it is the principal tool for the City to use in evaluating public and private building projects and municipal-service improvements. The guiding vision of the 2040 General Plan is that Sacramento will be a national model of sustainable, equitable growth and community development. The 2040 General Plan seeks to direct growth and change into commercial and transit corridors, building on the city's existing assets and character. The General Plan also calls for managing growth in sustainable and equitable ways that benefit the whole community, increasing opportunity and prosperity for all.

The following policies in the Land Use and Placemaking Element may be relevant to the analysis of land use effects (City of Sacramento 2024a).

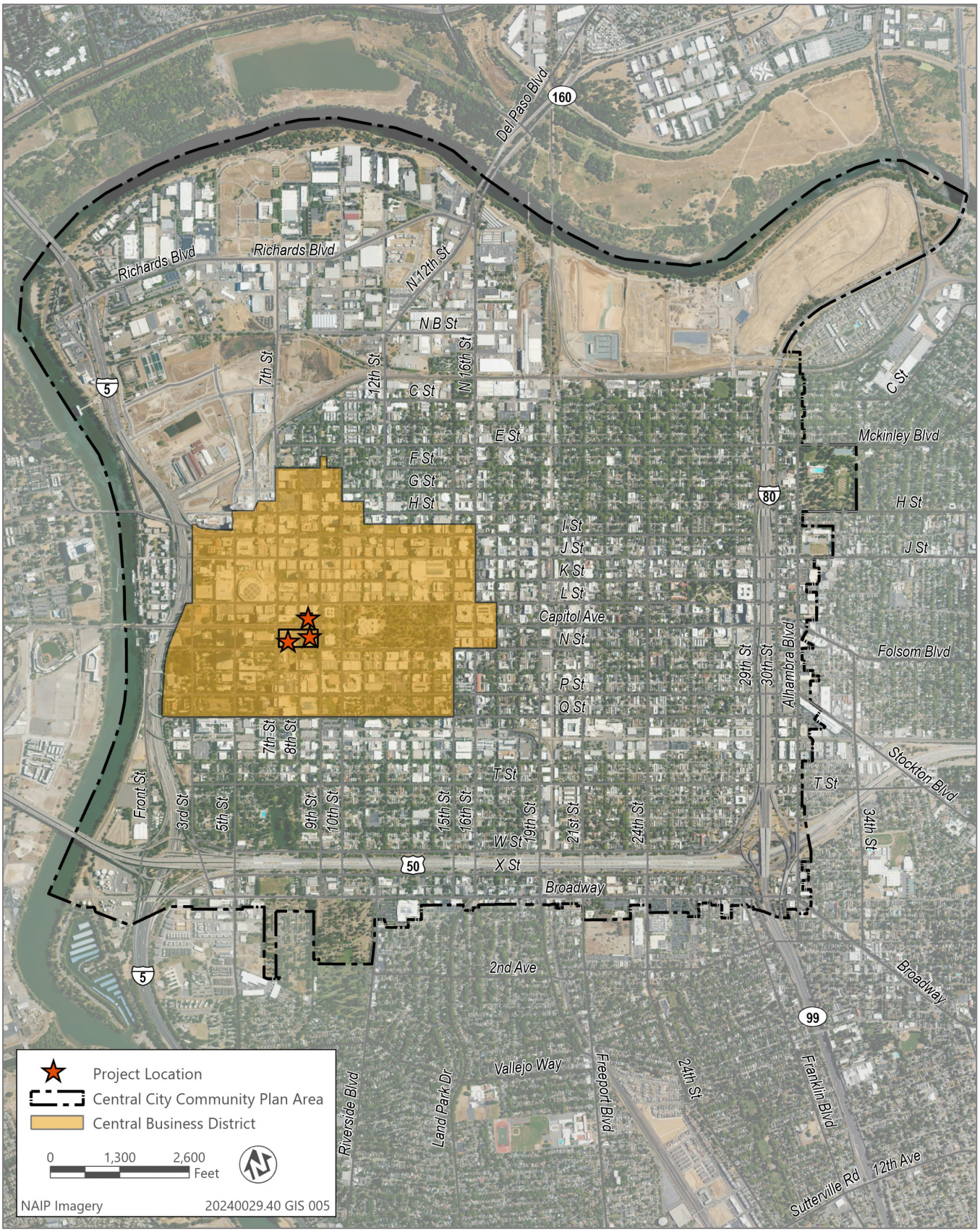
- LUP-1.1: Compact Urban Footprint. The City shall promote a land- and resource-efficient development pattern and the placement of infrastructure to support efficient delivery of public services and conserve open space, reduce vehicle miles traveled, and improve air quality.
- LUP-1.10: Adjacent Development. The City shall review new development proposals in adjacent jurisdictions during the environmental review process to identify and avoid potential land use, circulation, or other conflicts with existing and planned development in the city of Sacramento.
- LUP-2.1: Overall Balance of Uses. The City should encourage a balance and a mix of employment, residential, commercial, cultural, and tourism-related uses, as well as a full range of amenities and services necessary to support a thriving city.
- LUP-2.5: Design for Connectivity. The City shall require that all new development maximizes existing and new connections with surroundings and with centers, corridors, parks, and neighborhoods to enhance efficient and direct pedestrian, bicycle, and vehicle movement. When feasible, grid patterns should be utilized to facilitate multiple routes.

- **LUP-2.6: Employment Clusters.** The City should strengthen employment centers and clusters by facilitating the concentration of office, industrial, and commercial uses in these areas and by supporting enhanced transit access to them.
- **LUP-2.7: Evolving Office Needs.** The City shall support office developments that align with the evolving needs of target industry sectors, including but not limited to the following:
  - headquarter and business services,
  - health and life sciences,
  - the clean economy,
  - the creative economy,
  - advanced technology, and
  - future mobility.
- **LUP-3.5: Flexibility for Multi-Parcel Developments.** Where a developer proposes a development project on multiple parcels and some or all of the parcels have different General Plan residential densities or floor area ratios (FARs), the City may, at the discretion of the Community Development Director, calculate the net General Plan density or FAR range and apply that net density or FAR range to the net developable area of the entire project site. Some individual parcels may be zoned for densities/FARs that exceed the maximum allowed FAR under this policy, provided that the net density/FAR of the project as a whole is within the allowed range.
- **LUP-3.6: Minimum FAR.** The City shall regulate minimum building intensity using floor area ratio (FAR) standards consistent with Map LUP-7. Minimum FAR standards apply to new mixed-use and non-residential development.
- **LUP-3.7: Minimum Density.** City shall regulate minimum density standards using Map LUP-8. Minimum density standards apply to new standalone residential development.
- **LUP-3.9: Minimum Standards for Renovations and Expansions.** The City shall permit renovations and expansions of existing development that fall below the allowable minimum density or floor area ratio (FAR), provided that the density or FAR is not reduced and the proposed use does not substantially undermine the long-term vision of the General Plan.
- **LUP-3.11: Zoning Inconsistency.** Zoning is consistent with the General Plan if it is compatible with the objectives, policies, general land uses, and programs specified in the plan. (Cal. Gov't Code, § 65860(a)(2).) Zoning is compatible with the objectives, policies, general land uses, and programs specified in the plan if, considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment. (See also Sacramento City Code, § 17.104.100.C, as may be amended.)
- **LUP-4.7: Visual and Physical Character.** Using development standards and design standards/guidelines, the City shall promote development patterns and streetscape improvements that transform the visual and physical character of automobile-oriented corridors to create a positive impact on the human and natural systems that interact with them.

City of Sacramento Central City Community Plan

The project site is located within the Central Business District (CBD) of the Central City Community Plan area, which is the core of the City of Sacramento (City of Sacramento 2024b) (Figure 4.2-2). The CBD is an urban downtown area that includes State government buildings, corporate offices and businesses, high-rise condominiums, historic neighborhoods, parks and recreational areas, nightlife, restaurants and shops, schools, and industrial and manufacturing complexes all within a tree-lined street grid. The 2040 General Plan envisions the Central City to have abundant housing; tree-lined streets; walking paths; and clean, vibrant public parks combining to create unsurpassed urban living and a welcoming blend of Sacramento's rich history and its dynamic future. The community plan is intended to supplement the citywide policies above. Relevant community plan policies include the following:

- **CC-LUP-1 Central Business District.** The City shall strengthen the role of the Central City as the regional center of the greater Sacramento area for living, commerce, culture, and government.



Source: Adapted by Ascent in 2026.

Figure 4.2-2 Central City Community Plan Area

Uses identified for the CBD include office, retail, and service uses; condominiums and apartments; and gathering places, such as a plaza, courtyard, or park. All development in the CBD should have easy access to transit, and the CBD allows a maximum FAR of up to 15.0 for all development.

4.2.2 Environmental Setting

The State-owned Capitol Mall Office Buildings Demolition Project site is designated by the CAP Land Use Diagram as "office" (Figure 4.2-1) and is currently occupied by three office buildings with a combined gross floor area of approximately 729,700 square feet (sf) consisting of the EDD Headquarters Building at 800 Capitol Mall (approximately 479,300 sf), the EDD Solar Building Annex at 751 N Street (approximately 166,000 sf), and the State Personnel Board Building at 801 Capitol Mall (approximately 84,400 sf). The EDD Headquarters Building and EDD Solar Building Annex are currently both vacant, and the State Personnel Board Building is occupied at approximately half of capacity.

Land uses surrounding the project site include the EDD Annex "Subterranean Building" and the Standford Mansion to the south across N Street and the Jesse Unruh Office Building and the State Library and Courts Building to the east across 9th Street. The Sutter Club Building is located directly east of, and adjacent to, the State Personnel Board Building. Directly north of the State Personnel Board Building, across the L Street Capitol Mall Alley, is a building containing retail, restaurant, office, and parking garage uses. To the west of the State Personnel Board Building, across 8th Street, is the California Department of Rehabilitation Building. To the west of the EDD Headquarters Building and EDD "Solar Building" Annex, across 7th Street, is the John Moss Federal Building containing office space for multiple federal agencies.

Within a 3-block radius of the project site is broad mix of land uses, including the California State Capitol Building and Capitol Park; various State and private office buildings; high-, medium-, and low-rise apartment buildings; the Golden 1 Center; and the Downtown Commons district containing numerous retail and restaurant uses.

4.2.3 Environmental Impacts and Mitigation Measures

METHODOLOGY

Evaluation of potential land-use impacts is based on a review of the planning documents pertaining to the project study area including the State's CAP, the City's 2040 General Plan and Zoning Code, and the Sacramento Central City Community Plan. The physical layout and other characteristics of the project study area were examined during site visits and in reviews of relevant planning documents to determine whether alterations of the project site would result in physical divisions of established communities.

As described in Section 4.2.1, "Regulatory Background," DGS developed the Capitol Area Plan and is responsible for its administration, implementation, and necessary revisions (DGS 1997a). The Capitol Mall Office Buildings Demolition Project would be under the jurisdiction of DGS. As a State agency, DGS is exempt from complying with local or county plans, policies, or zoning regulations. However, the City may be required to make a finding that the project is consistent with the 2040 General Plan before approving any encroachment or utility permits needed for the project (Government Code Section 65401). Therefore, the analysis of potential land-use impacts includes a review of principles, goals, and policies contained in applicable local planning documents (listed above under "Local" in Section 4.2.1, "Regulatory Setting").

THRESHOLDS OF SIGNIFICANCE

A land use and planning impact is considered significant if implementation of the Capitol Mall Office Buildings Demolition Project would do any of the following:

- physically divide an established community; or
- cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

ISSUES NOT DISCUSSED FURTHER

All potential land use and planning impacts are evaluated below.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 4.2-1: Potential to Divide an Established Community

The Capitol Mall Office Buildings Demolition Project would result in the demolition of three existing state-owned office buildings to allow for future development. While the specifics of future development have not been confirmed, the site is envisioned as a Downtown Sacramento campus of Sacramento State, with various land use types being considered for the site. The project is consistent with the existing pattern of urban land uses downtown and west of the State Capitol. No part of the project would extend beyond the existing urban boundaries. The existing street grid would be maintained allowing continued movement of people and vehicles through the area. Although demolition activities would temporarily restrict or redirect movement around the site, no part of the project would create a barrier within the established downtown community. Therefore, the project would have a **less-than-significant** impact related to dividing an established community.

Demolition

The project would include demolition of three existing state-owned office buildings in downtown Sacramento to allow for future development of other uses within these parcels. The existing pattern of land uses in the project vicinity is characterized by public and private office uses, parking lots, residential uses, retail uses, commercial uses, and parks that are typical of urban areas. The project site is surrounded by existing government office and high-density residential buildings, as well as parking facilities. The project site and surrounding area is within the downtown Sacramento street grid. Demolition of the existing office buildings would not alter the existing pattern of development and access downtown and within the vicinity of the project site. Demolition of the existing office buildings would not extend beyond the existing urban boundaries of downtown Sacramento, and no part of demolition activities would cause or result in a barrier within an existing established community. During abatement and demolition activities, there will be periods where it will be necessary to restrict or redirect pedestrian, bicycle, vehicular, and transit movements around the site, these restrictions such as lane closures, lane narrowing, and detours would be temporary. Additionally, vehicular, pedestrian, and bicycle access to apartments, offices, and other buildings in the area would be maintained via the existing street grid even if streets and sidewalks are temporarily blocked off adjacent to the project site.

Future Development

Upon completion of the building demolition and transfer of the property to the receiving entity (e.g., CSU for use by Sacramento State), construction of future uses could be initiated after project specific CEQA review and any other necessary authorizations are obtained. As described in Chapter 3, "Project Description," DGS has been in ongoing discussions with Sacramento State for the potential reuse of the site. The current vision for future developments includes a Downtown Sacramento campus of Sacramento State, with various land use types being considered. These uses include, but are not limited to, a school of public affairs, student housing, conference and event center, innovation center and additional academic or cultural uses, hotel, indoor performing arts and music venue, market rate housing, ground floor retail, commercial office space, and structured parking, along with potential interim uses of

the site prior to final development. The Downtown Sacramento campus development scenario evaluated in this EIR includes approximately 3,630,000 gross square feet of building space. Any future buildings would be subject to height limits, setbacks, and other constraints prescribed by the Capitol View Protection Act. Although there would likely be occasional temporary restrictions on pedestrian, bicycle, and vehicle movements adjacent to the project site during construction (similar to what would occur during demolition), the existing street grid would be maintained providing access in the project area the same, or similar to, the existing condition. Future development would not conflict with surrounding land uses, as future development would be consistent with the existing pattern of development downtown and within the vicinity of the project site. No part of future development would extend beyond the existing urban boundaries of downtown Sacramento, and no part of future development would result in a barrier within an existing established community.

Conclusion

The existing land uses in the project vicinity are characterized by urban development, including public and private office uses, parking lots, residential uses, retail uses, commercial uses, and parks that are typical of urban areas. Demolition of the three existing state-owned office buildings and future development evaluated for the site would be consistent with the existing pattern of urban land uses within downtown and the vicinity of the project site. While both demolition and future construction activities would result in periods of restriction or redirection of pedestrian, bicycle, or vehicular movements, these activities would be temporary and vehicular, pedestrian, and bicycle access to apartments, offices, and other buildings within the area would be maintained, so as to not divide the downtown community. After demolition activities, the future development currently evaluated for the project site would be consistent with the existing character of the urban environment and the existing street grid would be maintained. Demolition and future development would not result in a barrier within downtown or an existing established community. Thus, the proposed project would result in a **less-than-significant** impact related to division of an established community.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.2-2: Consistency with Land Use Plans and Documents

The Capitol Mall Office Buildings Demolition Project would be consistent with the objectives and purposes of the Capitol Area Plan, the Capitol Area Plan Implementation Program, the 2021 California Five-Year Infrastructure Plan, and with local land use plans. Demolition of the existing state-owned office buildings and future development of the project site would not result in any conflicts with environmental plans, goals, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. This impact would be **less than significant**.

The project site is currently owned by the State of California and managed by DGS, and is within the CAP boundary. Land use consistency of the project is compared against the CAP and accompanying CAP Implementation Program, which are the entitled land-use plan and implementation guidance, respectively, for development on State-owned land in the Capitol Area.

Demolition

The project would include demolition of three existing state-owned office buildings in downtown Sacramento. The proposed demolition of the three existing state-owned office buildings would not result in a conflict with the State's CAP, CAP Implementing Program, and 2021 California Five-Year Infrastructure Plan as demolition of the buildings would not result in the project site changing from the State's CAP designation as "office." Although the proposed project was not specifically identified in the 2021 California Five-Year Infrastructure Plan as an initial project, the demolition of the three existing state-owned buildings, as well as future land transfer, would not conflict with the plan's budget for DGS for the renovation of six state office buildings and two property acquisitions (California Budget 2021).

The State is not subject to local plans and policies; however, DGS has considered consistency with the 2025 Blueprint, 2020 MTP/SCS, City of Sacramento 2040 General Plan, and Central City Community Plan. Both the CAP and these local land use plans call for infill development in Sacramento, intensifying uses on underutilized sites near transit,

increased opportunities for pedestrian and bicycle use, prioritizing energy- and water-efficient buildings and reduction of carbon emissions, and locating housing closer to jobs. Demolition activities and land transfer would be consistent with the local plans because demolition and land transfer would provide an opportunity for future infill development within the urban downtown area to occur.

Future Development

As previously described, DGS has been in discussions with Sacramento State for the potential reuse of the site to create a downtown campus. Ten land use types have been considered for future development of the project site, including a school of public affairs, student housing, conference and event center, innovation center and additional academic or cultural uses, hotel, indoor performing arts and music venue, market rate housing, ground floor retail, commercial office space, and structured parking, are being considered. As mentioned above, the project site is located in an area that the CAP designates as "office."

As described in Chapter 3, "Project Description," DGS may transfer the site to CSU for use and future development by Sacramento State. Once DGS transfers the properties of the existing state-owned sites to another entity, DGS would relinquish all responsibility and authority over the properties and would have no jurisdiction over how the properties are used. Per the statutory objectives of the CAP, listed above under Section 4.2.1, "Regulatory Settings," the CAP was not primarily adopted for the purpose of avoiding or mitigating an environmental effect. Regardless, development of the ten proposed land uses would meet the Housing, Transportation and Parking, Open Space and Public Amenities, Development of the Community, and the Energy Conservation objectives of the CAP through development of student housing and market-rate residential apartments, a parking structure, a conference and event center and indoor performing arts and music venue, and by providing future development that meets current building standards and codes, as well as energy efficiency and conservation policies typically implemented by CSU. Further information regarding energy efficiency is found in Section 4.8, "Energy." Additionally, future development would be generally consistent with the 2025 Blueprint, 2020 MTP/SCS, City of Sacramento 2040 General Plan, and Central City Community Plan by supporting infill development, intensifying uses on underutilized sites near transit, increased opportunities for pedestrian and bicycle use, prioritizing energy and water-efficient buildings and reduction of carbon emissions, and locating housing closer to jobs.

Although future development involving any of the ten land use types under consideration for the project site would not be entirely consistent with the CAP's "office" designation, DGS's transfer of the parcels to the CSU for future development would not result in a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Further, because DGS is responsible for updating, developing, and implementing the CAP, parcels transferred to CSU would no longer be required to be consistent with the CAP.

Conclusion

Though DGS is not subject to local plans, the demolition of the three state-owned office buildings would be consistent with applicable State and local planning documents by supporting the opportunity for future infill development within downtown Sacramento. The land use types being considered generally align with CAP objectives of Housing, Transportation and Parking, Open Space and Public Amenities, Development of the Community, and Energy Conservation. Although future land uses may be partially inconsistent with the Capitol Area Plan's "office" designation, the transfer of the property to CSU would remove site requirements for consistency with the CAP and would not result in a significant environmental impact related to land use plan consistency. Additionally, both demolition and future development activities would be consistent with the objectives of local plans through supporting infill development, intensifying uses on underutilized sites near transit, increased opportunities for pedestrian and bicycle use, prioritizing energy and water-efficient buildings and reduction of carbon emissions, and locating housing closer to jobs. Therefore, the project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect and this impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

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4.3 POPULATION, EMPLOYMENT, AND HOUSING

This section documents the existing population, employment, and housing conditions in the City of Sacramento and the project region and assesses changes to those conditions that could result from implementation of the Capitol Mall Office Buildings Demolition Project. This section also characterizes the population, employment, and housing changes that could trigger adverse physical effects in the city or the region.

No comment letters regarding population, employment, or housing were received in response to the Notice of Preparation (see Appendix A).

4.3.1 Regulatory Setting

FEDERAL

No federal plans, policies, regulations, or laws related to population, employment, and housing are applicable to the project.

STATE

Capitol Area Plan

The 1997 Capitol Area Plan (CAP) is the statutory master plan for development on State-owned land surrounding the State Capitol, in accordance with Government Code Section 8160 et seq. The CAP envisions State offices, housing, neighborhood commercial, parking, and multimodal streets creating a vibrant urban district in the heart of Sacramento. Per the 2015 CAP Progress Report, the State's portfolio in the Capitol Area includes 33 office buildings that provide over 9.3 million gross square feet (GSF) of office space, as well as sites that are identified for future office development. The CAP identified plans for 2.8 million GSF of state office development within the Capitol Area. As of January 2015, 1.5 million GSF of office development was completed and an additional 1.3 million GSF of development remained to be constructed (DGS 2015: 4).

The following CAP objectives are relevant to population, employment, and housing.

- State Offices. To provide offices and related services to meet present and future space requirements for the State of California near the State Capitol and in the context of metropolitan Sacramento, in the most cost-effective manner.
- Development of the Community. To stimulate the development of a community within the Capitol Area, which is attractive and comfortable to work in, live in, and visit, which is integrated into the fabric of the rest of the City of Sacramento, and which is physically and economically viable over the long term.
    - Principle 1: Provide commercial and service facilities to meet the needs of residents, employees, and visitors in the Capitol Area.
    - Principle 2: Incorporate ground floor commercial into new state office and parking facilities and housing developments as feasible and appropriate, consistent with principles and land use designations, market demand, and other development considerations.

LOCAL

The buildings on the project site are located on State-owned property and would be demolished by the Department of General Services (DGS) and subsequent development is presumed to be undertaken by the California State University, Sacramento (Sacramento State or the University), another State agency. As explained in Section 4.2 "Land Use" of this Draft EIR, under Section 4.2.1, "Local," state agencies are not subject to local plans, policies, and zoning

regulations. Nevertheless, in the exercise of its discretion, DGS does reference, describe, and address local plans, policies, and regulations that may be applicable to the project. This evaluation is also intended to be used by local agencies for determining, as part of their permit processes, the project's consistency with local plans, policies, and regulations.

Sacramento Region Blueprint

The original Sacramento Region Blueprint was adopted by the Sacramento Area Council of Governments (SACOG) in 2004. The Blueprint was a vision for growth that promoted compact, mixed-use development and more transit choices as an alternative to low-density development. It defined a path to growth through 2050 that is generally consistent with principles of "Smart Growth," encouraging a variety of housing close to employment, shopping, and entertainment and providing options for walking, biking, and transit. It proposes balanced jobs and housing growth; emphasizes infill development; and proposes housing variety, including large- and small-lot single-family units and attached multifamily units consistent with demographic trends and market conditions (SACOG 2026).

2025 Blueprint Plan

The 2025 update of the Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS), referred to as the 2025 Blueprint Plan, was adopted on November 20, 2025. The MTP/SCS is a long-range plan for transportation in the region following SACOG's adoption of the Blueprint. Under California's Sustainable Communities and Climate Protection Act, or Senate Bill (SB) 375 (Statutes of 2008, Chapter 728), SACOG is required to adopt an SCS as part of every MTP that aligns transportation, housing, and land use decisions to help achieve the per-capita reduction targets for greenhouse gas (GHG) emissions from passenger vehicles that are set by the California Air Resources Board.

The 2025 Blueprint forecasts growth over a 30-year planning period (2020-2050). Long-term population, household growth, and employment projections used in the preparation of the 2025 Blueprint were developed by SACOG and the Center for the Continuing Study of the California Economy. The plan estimates that the region will add an additional 580,000 people, 263,000 jobs, and 278,000 new homes during the planning period (SACOG 2025a).

City of Sacramento 2040 General Plan

The following policies from the City of Sacramento 2040 General Plan are relevant to the analysis of population and housing effects (City of Sacramento 2025):

Land Use and Placemaking Element

- LUP-1.1 Compact Urban Footprint. The City shall promote a land- and resource-efficient development pattern and the placement of infrastructure to support efficient delivery of public services and conserve open space, reduce vehicle miles traveled, and improve air quality.
- LUP-1.8 Jobs-Housing Balance. The City shall encourage a balance between job type, the workforce, and housing development to reduce the negative impacts of long commutes and provide a range of employment opportunities for all city residents.
- LUP-2.1 Overall Balance of Uses. The City should encourage a balance and a mix of employment, residential, commercial, cultural, and tourism-related uses, as well as a full range of amenities and services necessary to support a thriving city.
- LUP-2.3 Diverse Centers and Corridors. The City shall encourage the development of centers and corridors that address diverse community needs, support local market opportunities, are well-served by transit, and are well-integrated with the surrounding neighborhoods.
- LUP-2.6 Employment Clusters. The City should strengthen employment centers and clusters by facilitating the concentration of office, industrial, and commercial uses in these areas and by supporting enhanced transit access to them.

- **LUP-4.3 Anchor Institutions.** With respect to anchor institutions (colleges, medical centers, and public agencies), the City shall encourage the integration of uses and amenities in and around these campuses that increase economic opportunity, neighborhood vitality, and quality of life. Such uses and amenities may include the following:
  - Housing,
  - Retail,
  - Neighborhood services,
  - Arts/culture venues, athletic facilities,
  - Parks,
  - Improved pedestrian/bikeway connections,
  - "Green" infrastructure, or
  - Other publicly accessible facilities.
- **LUP-5.1 Evolving Regional Commercial Centers.** The City shall promote housing and employment uses at existing regional commercial centers to enhance retail viability, establish pedestrian-oriented shopping districts, create more attractive buildings and public spaces, support transit viability, and reduce vehicle trips. The City shall facilitate the replacement of surface parking, drive aisles, and shared parking facilities to further this policy.
- **LUP-5.3 Mixed-Use Neighborhood Centers.** The City shall promote the development of strategically located mixed-use neighborhood centers that accommodate local-serving commercial, employment, entertainment, and cultural uses; provide diverse housing opportunities; are within walking distance of surrounding residents; and are efficiently served by transit.

Economic Development Element

- **E-1.1 Strengthening Employment Clusters.** The City should endeavor to actively recruit and consider ways to add and to build on existing employment clusters in Sacramento, including those in the following key sectors:
  - Food and agriculture;
  - Advanced manufacturing, information and communication technology;
  - Future mobility;
  - Clean economy; and
  - Life sciences and health services.
- **E-1.7 Destination For Business.** The City should endeavor to position itself as a destination for business by actively promoting Sacramento's assets and collaborating with the Greater Sacramento Economic Council (GSEC), the State of California, colleges, hospitals, and other local and regional business and employment groups.
- **E-2.4 Access to Labor and Jobs.** The City should endeavor to foster job growth in areas with higher population density and existing or planned transit connections to improve access to labor for employers and access to jobs for residents, particularly residents of low-income neighborhoods.
- **E-4.6 Education and Training Systems.** The City should work to attract professional, vocational, and technical institutions and engage employers in the development of education and training systems that equip Sacramentans with the skills and knowledge needed to succeed in an advanced economy.
- **E-4.9 New Graduate Workforce Integration.** The City should consider collaborating with employers and higher education institutions to expand programs that connect new college graduates and current students with job and internship opportunities in Sacramento to better integrate them into the local workforce and retain them after graduation.

Central City Specific Plan

The 2018 Central City Specific Plan provides a guide for the growth and development of Sacramento's Central City. The Specific Plan area defines historic neighborhoods as well as 13 planning districts. The City is currently undergoing a process to update the Plan to reflect changes since 2018 and to be consistent with the 2040 General Plan Update and other planning initiatives. The following goals and policies from the Specific Plan pertain to the project:

- CC-LUP-1 Central Business District. The City shall strengthen the role of the Central City as the regional center of the greater Sacramento area for living, commerce, culture, and government.

City of Sacramento Climate Action and Adaptation Plan

The City of Sacramento Climate Action and Adaptation Plan (CAAP) was developed to mitigate and adapt to climate change, building off the City's 2012 Climate Action Plan. The CAAP leads greenhouse gas (GHG) emissions reductions and sets targets for carbon neutrality by 2045. Measures, actions, and key performance indicators are defined to track reductions and ensure consistency with climate action targets. The following measures, actions, and key performance indicators are relevant to the project (City of Sacramento 2024a):

- Measure E-5: Support infill growth with the goal that 90% of new growth is in the established and center/corridor communities and 90% small-lot and attached homes by 2040, consistent with the regional Sustainable Communities Strategy. Project-level VMT should be 15% below (or 85% of) the regional average.
- Key Performance Indicator B: 29,000 new multi-unit dwellings that are transit accessible by 2040

4.3.2 Environmental Setting

The Capitol Mall Office Buildings Demolition Project is located in downtown Sacramento, within the Central Business District (CBD). The existing citywide and countywide data and future trends regarding population, employment, and housing are presented below.

POPULATION AND POPULATION GROWTH

The SACOG 2025 Blueprint projections estimate that the region's population will grow by approximately 580,000 people by 2050, resulting a projected regional population of 3,120,000. (The region includes El Dorado and Placer Counties [minus the Tahoe area] and Sacramento, Sutter, Yolo, and Yuba Counties.)

During the 10-year period from 2010 to 2020, the population of the City of Sacramento increased from 466,488 to 524,943, or 12.5 percent (US Census 2026). Population as of January 1, 2026, is estimated to be 539,765 (DOF 2026a). Between 2020 and 2026, the estimated average population growth rate in Sacramento was approximately 0.5 percent per year ([(539,765 – 524,943) ÷ 524,943 x 100] ÷ 6 years = 0.47 percent). As shown in Table 4.3-1, population growth in the city is projected to continue at an increasing rate between 2020 and 2050. City of Sacramento population projections indicate that the city may have about 638,433 residents by 2040, representing 35 percent of the county's total population (Table 4.3-1).

Table 4.3-1 Population Estimates for the City of Sacramento, Sacramento County, and Region

—	2020	2030	2040	2050
City of Sacramento[1]	524,943	—	638,433	—
Sacramento County[2]	1,589,948	1,675,803	1,845,506	1,899,431
Region[3]	2,540,000	—	—	3,120,000

Note: "-" = Source does not provide data for this year.

[1] Provided by the US Census and the City of Sacramento.

[2] Provided by the Department of Finance (2026b).

[3] Provided by the 2025 Blueprint.

Sources: US Census 2026; City of Sacramento 2023: 3-25; DOF 2026b; and SACOG 2025a: Figure 3.1.

HOUSING UNITS AND VACANCY

The California Department of Housing and Community Development (HCD) provides a Regional Determination of housing need, comprised of a total number of units within four income categories, for which SACOG is responsible for developing a Regional Housing Needs Allocation to each member city and county. For the 2021-2029 cycle, HCD provided SACOG with a regional determination of 153,512 new housing units, of which 45,580 would be required in the City of Sacramento to meet regional housing needs (SACOG 2020).

Data from the 2024 American Community Surveys reflect Sacramento as a community with a rental vacancy rate of 4.5 percent, homeowner vacancy rate of 0.7 percent, and a median home value of 515,800 dollars (US Census 2024). According to the 2024 Housing Element Progress Report, the City of Sacramento approved 3,730 housing permits in 2021, 2,880 in 2022, 2,735 in 2023, and 2,387 in 2024 (City of Sacramento 2024b). The US Census American Community Survey estimated that the City had 212,485 housing units in 2024 and there was a homeowner vacancy rate of 0.5 percent and rental vacancy rate of 4.7 percent. These rates indicate that both the city has a tight housing market and a housing shortage.

To meet projected housing demand for the city and the region, over 45,580 new housing units would need to be constructed between 2021 and 2029 (about 5,700 new units per year), which is a greater pace of housing growth than occurred between 2021 and 2024. As of 2024, 10,459 new housing units were approved and planned in the city, which is 23 percent of the projected 2029 housing units (City of Sacramento 2024b).

Table 4.3-2 City of Sacramento Housing and Job Growth Forecast (2018-2040)

	2018	2022	2024	2040
Jobs	243,300	248,000	254,700	391,826
Housing Units	197,753	212,260	212,485	266,765
Jobs/Housing Index	1.23	1.17	1.20	1.47

Sources: EDD 2026a; City of Sacramento 2023: Table 2-3; US Census 2022.

EMPLOYMENT AND EMPLOYMENT CENTERS

Employment growth is one of the primary determinants of housing demand. Working age individuals often will choose a place to live based on employment prospects in the local area. Therefore, employment trends are an important indicator of housing demand. The rate of employment growth, and the types of jobs most likely to be created, would determine how much housing would be needed by type and cost. For example, an economy based on seasonal tourism will generate different housing needs for local workers than economies based on government, education, research, or technology.

Sacramento County

As shown in Table 4.3-3, there were an estimated 731,000 jobs in Sacramento County in 2024 and an estimated 621,300 jobs in 2020. In 2024, the unemployment rate for the county was 5 percent. The county labor market is dominated by government employment, private education and health, and trade, transportation and utilities. Of the total employment, 26 percent is in government, 19 percent is in private education and health services, 13 percent in professional and business services, and 14 percent in trade, transportation and utilities.

Table 4.3-3 Employment by Industry in Sacramento County

Industry	2015	2020	2024	Percent Change (2015-2024)
Total Farm	2,700	2,400	3,600	33.3
Goods Producing	51,900	64,200	69,400	33.7
Mining and Logging	100	200	100	0
Construction	31,000	42,200	45,900	48

Industry	2015	2020	2024	Percent Change (2015-2024)
Manufacturing	20,800	21,800	23,400	12.5
Trade, Transportation & Utilities	90,800	95,200	105,300	16
Information	10,000	6,900	6,300	-37
Financial Activities	32,700	33,000	29,100	-11
Professional and Business Services	88,400	95,500	97,000	9.7
Private Education and Health Services	102,000	115,600	137,800	35.1
Leisure and Hospitality	58,700	50,600	67,200	14.5
Other Services	20,800	21,200	26,500	27.4
Federal Government	10,000	11,000	10,900	9
State Government	87,900	94,700	108,300	23.2
Local Government	65,400	61,400	69,600	6.4
Total	621,300	651,600	731,000	17.7

Source: EDD 2026b.

JOBS/HOUSING BALANCE

The concept of jobs/housing balance presumes that the environment and quality of life in a given area benefit when the area has a balance between its housing supply and employment base. An area that has too many jobs relative to its housing supply is likely (in the absence of offsetting factors) to have substantial in-commuting, relatively rapid increases in housing prices, and intensified pressure for additional residential development. Conversely, if an area has relatively few jobs in comparison to the number of employed residents, many of the workers are required to commute to jobs outside their area of residence. Commuting results in more traffic congestion, air quality degradation, and noise generation.

The simplest measure of jobs/housing balance is an index based on the ratio of employed residents (which is influenced by the number of homes) to jobs in the area, with an index of 1.0 indicating an equal balance of employees/housing and jobs. An index below 1.0 would indicate that the area has more housing than jobs and may suggest that many residents are commuting outside the area to their jobs. An index above 1.0 indicates that the area has more jobs than housing and may suggest that many residents are commuting to jobs from outside the community.

It should be noted that jobs/housing indices are more useful for examining the potential for "self- containment" at the regional level than for determining whether this self-sufficiency exists in a given community. Even if communities have a statistical balance between jobs and housing, they are still likely to experience in-commuting and out-commuting, given the variety and dispersed nature of employment and residential opportunities elsewhere in the region and the high level of mobility offered by automobiles and regional and subregional public transit, such as Sacramento Regional Transit buses and light rail.

REGION

To plan for and build a transportation system that meets the needs of the region over the next two decades, SACOG updates the MTP/SCS include a regional growth forecast for population, housing, and jobs, and the anticipated locations of job-generating development and residences. The 2025 MTP/SCS (2025 Blueprint) and its growth forecast was developed in coordination with the local agencies and incorporated the most recent local plans and policies for El Dorado, Placer, Sacramento, Sutter, Yolo, and Yuba counties and the 22 cities within those counties (excluding the Tahoe Basin) (SACOG 2025a).

The 2025 Blueprint anticipates that new growth between 2020 and 2050 would result in a jobs/housing ratio of 0.9 within the region and for Sacramento County (SACOG 2025b: Table 2-4). The plan identifies anticipated growth across community types: center and corridor communities, established communities, developing communities, rural residential communities, and lands not identified for development in the 2025 Blueprint. Center and corridor communities, like downtown Sacramento, would see the greatest increases in employment. In 2050, center and corridor communities throughout the County would have 597,446 employees and 236,785 dwelling units (SACOG 2025b: Table 2-5), resulting in a jobs/housing ratio 2.5.

CITY OF SACRAMENTO

The trend in the jobs/housing index for the City of Sacramento using baseline year 2020 and forecast year 2050 is provided by SACOG, shown in Table 4.3-4 (SACOG 2025a: Appendix C). In 2020, the jobs/housing index for downtown Sacramento was 10.23 as compared to 1.63 for the City of Sacramento as a whole. In 2050, the jobs/housing index for the downtown is projected to drop to 4.96, while the citywide index would be relatively stable at 1.35.

According to the City of Sacramento General Plan, the City's jobs/housing index was 1.59 in 2018 and 1.63 in 2020 (SACOG 2025: Appendix C) and is projected to be 1.47 in 2040 (City of Sacramento 2023: 2-36). This increase indicates that the relative imbalance between housing and jobs in the city increased from 2018 to 2020, with employment growth slightly outpacing housing growth. These indices show that Sacramento continued to have more jobs than housing units in 2020 and that the city supports a net in-commuting population. The jobs/housing index for the City of Sacramento is projected to decrease over time. Based on assumptions by the City as part of its 2040 General Plan Update, the jobs/housing index would be approximately 1.47 in 2040. Based on projections from SACOG for land use development, the jobs/housing index for the City would be approximately 1.35 in 2050. Although there would be a greater number of jobs than housing in 2050 compared to 2020, the jobs/housing balance of 1.35 in the City of Sacramento is projected to be somewhat balanced.

Table 4.3-4 Jobs and Households in the Region, 2020 and 2050

Area	Jobs		Housing Units		Job/Housing Index	
	2020	2050	2020	2050	2020	2050
Downtown Sacramento	88,800	92,950	8,680	18,755	10.23	4.96
City of Sacramento	329,980	385,815	202,300	286,065	1.63	1.35
Region	1,127,570	1,390,570	951,700	1,229,700	1.18	1.13

Source: SACOG 2025: Appendix C.

EXISTING CONDITIONS

The project sites include the following state-owned buildings: the 479,300-square-foot (sf) EDD Headquarters Building, the 166,000-sf EDD Solar Building Annex, and the 84,200-sf State Personnel Board Building. While the buildings are now largely vacant, at their peak capacity they supported 2,658 State employees.

4.3.3 Environmental Impacts and Mitigation Measures

METHODOLOGY

This examination of population, employment, and housing conditions is based on information obtained from review of the plans for the project; review of available population, employment, and housing projections from the City of Sacramento, SACOG, the US Census Bureau, the California Employment Development Department and other sources; and review of applicable elements and policies from the City of Sacramento 2040 General Plan and the City of Sacramento Housing Element.

The projected increases in population, employment, and housing resulting from future development of the project site are based on the development assumptions presented in Table 4.3-5.

Table 4.3-5 Development Assumptions

Development Component	Assumption	Estimated Population
Residential Development		
Student Housing	500 units at 1.5 residents per unit	750 residents
Market-Rate Apartments	750 units at 2.6 residents per unit	2,000 residents
Total Residential Development	**1,250 housing units**	**2,750 residents**
Employment and Other Uses		
University Employees	Faculty and staff	500 employees
University Students	Enrollment	4,500 students
Conference and Event Center	Operational staffing assumption	20 employees
Indoor Performing Arts and Music Venue	Operational staffing assumption	20 employees
Retail/Office Uses	Employment generated by proposed uses	2,668 employees
Total Permanent Employment	**University, event center, arts/music venue, and retail/office uses**	**3,208 employees**
Total Students	**University enrollment only**	**University enrollment only**
Total Project Site Employees and Residents	**Employees + residents**	**5,958 people**

Source: Compiled by Ascent in 2026.

THRESHOLDS OF SIGNIFICANCE

A population, employment, and housing impact is considered significant if implementation of the Capitol Mall Office Buildings Demolition Project would do any of the following:

- induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure); or
- displace substantial numbers of existing people or homes, necessitating the construction of replacement housing elsewhere.

ISSUES NOT DISCUSSED FURTHER

Though currently vacant other than 86 employees remaining in the State Personnel Board building, the project site includes three State buildings that historically supported 2,658 employees. The buildings were identified as underutilized and employees were relocated to other State office buildings to support more efficient use of office spaces. There is no existing housing located at the project sites and therefore no housing would be displaced as a result of the project. Future development is anticipated to include student housing and market rate housing. The project would not necessitate construction of replacement housing elsewhere and this issue is not analyzed further in this EIR.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 4.3-1: Induce Population Growth and Housing Demand During Demolition/Construction

Project implementation would generate a temporary increase in employment. Demolition would require approximately 40-55 workers during periods of peak activity, and future development after transfer of the property is assumed to require approximately 325 construction workers during periods of peak activity. The number of existing construction personnel in the Sacramento region is sufficient to meet the demand associated with the demolition and future construction phases of the project; therefore, this temporary increase in employment would not generate any substantial new population growth or generate the need for substantial additional housing for construction workers. This impact would be **less than significant**.

Demolition

Abatement and demolition of the three buildings is expected to commence in Fall 2027 and take approximately 18 months to complete. The number and type of workers would fluctuate depending on the phase of work. When the only project activity is hazardous materials abatement on the first building, the workforce is estimated to be approximately 25-40 workers. During periods when abatement of one building and demolition of another building are occurring concurrently, the workforce is estimated to be 40-55 workers. At the end of the process, when the only project activity is the demolition of the last building, the workforce is estimated to be 15-25 workers. Construction is the labor category most likely to provide abatement and demolition workers. According to the latest labor data available from EDD (2024), 45,900 residents in Sacramento County are employed in the construction industry (see Table 4.3-3). Based on the unemployment rate of 5 percent in 2025 for Sacramento County, approximately 2,157 construction employees in the County could be available to work on the proposed project. This construction labor force within the County (labor force is defined as all of those people that are employed or are looking for employment), coupled with those of other areas within commute distance (e.g., Yolo, Placer, and El Dorado counties), would be sufficient to meet the demand for demolition workers that would be generated by the project. Additionally, it is the nature of the construction/demolition/abatement industries for contractors to bid and work on projects based on their availability and need for work. As existing projects near completion, contractors may seek out new projects to maintain employment for the same workers. Therefore, it is reasonable to assume that the project-generated demand for abatement and demolition workers would not necessarily draw new workers to the area, but would provide continuation of employment for contractors and workers already in the region.

Future Development

It is estimated, based on prior analysis of similar projects, that construction of the future development scenario evaluated in this EIR would generate approximately 325 construction jobs during peak construction periods. As previously discussed, based on the most recent labor data available from EDD, there are 45,900 construction workers employed within Sacramento County and approximately 2,157 construction workers in the County who could be available to work on the proposed project. For the same reasons described above for the building demolition process, the available construction workforce would be sufficient to meet the demand for construction workers that would be generated by the project.

Conclusion

Because construction crews for both demolition and future development can be expected to come from the local labor force in the City of Sacramento, Sacramento County, and surrounding areas, no substantial population growth or demand for new housing in the region as a result of these jobs would result. Therefore, the project would not generate the need for substantial additional housing during demolition or construction. The impact related to population growth and housing demand associated with construction of the project would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.3-2: Increased Employment Opportunities and Housing Demand from Project Development

Demolition of the three State office buildings would not result in any long-term employment opportunities. Future development at the level assumed for the Downtown Sacramento campus of Sacramento State is estimated to result in approximately 3,200 new permanent employees and 1,250 housing units. The approximately 3,200 new jobs are expected to be filled by local and regional residents (as well as students) and these jobs are consistent with State and local plans for job growth. The project would not generate new employment at levels that would induce population growth such that there would be additional demand for housing that could not be met by existing supply or by planned housing development. This impact is **less than significant**.

Demolition

Employment generation resulting from building demolition is addressed above in the discussion of Impact 4.3-1. The demolition phase of the project would not result in any long-term employment opportunities or induce population such that construction of additional housing would be necessary.

Future Development

Operation of future development would induce population growth and housing demand by varying numbers of employees and housing units, depending on the final design. For the purposes of this analysis, the project is estimated to result in approximately 3,200 new jobs and 1,250 new housing units (see Table 4.3-5). The following potential future land uses would result in increased population, employment opportunities, and housing units:

- The School of Public Affairs (including Innovation Center and additional academic or cultural uses) would serve approximately 5,000 combined students, faculty and staff.
- Student housing would include 500 apartment-style housing units, of which approximately 25 units would be family-oriented.
- The Conference and Event Center would have a maximum occupancy of 2,000 persons.
- The hotel would have 250 guest rooms.
- The Indoor Performing Arts and Music Venue of approximately 250,000 gross square feet (GSF) (Note, that as described in Chapter 3, "Project Description," maximum occupancy for standing room events, seated events, and other event configurations (e.g., sporting events) have not yet been determined for this land use).
- The project would include up to 750 market-rate residential apartments.
- The project would include approximately 147,000 GSF of ground-floor retail and 760,000 sf of commercial office space.

Future residential development would include a total of 1,250 housing units consisting of 500 student housing units, approximately 25 of which would be designated for family-oriented housing units, and 750 market-rate apartment units, which combined could accommodate approximately 2,750 residents at buildout (see Table 4.3-5). As described above, the project is estimated to result in 3,200 new jobs as a result of proposed future uses.

Altogether, the future land uses would result in an estimated 2,750 residents, 3,200 permanent employees, and approximately 4,500 university students associated with the project facilities. Employment and housing demand created by the project would result in some individuals relocating to available housing at or near the project site. The proposed 1,250 housing units included as part of the proposed project would provide on-site housing for approximately 2,750 residents, which could accommodate a substantial portion of the population associated with the proposed future development.

The addition of approximately 3,200 new employees in the downtown area would increase the number of jobs in the city by approximately 1.3 percent compared to the total number of jobs in 2024 (254,700 jobs). As discussed under "Housing Units and Vacancy" in Section 4.3.2, "Environmental Setting," above, vacancy rates indicate the housing supply for would-be homeowners is limited, but the rental market is balanced. The jobs/housing index further

underscores the limited housing supply in the city, particularly in the downtown area. However, the jobs/housing index for the city, Sacramento County, and region indicates that the overall number of jobs and amount of housing are generally balanced relative to employment opportunities. SACOG projections for jobs and housing, which consider local agency land use plans, indicate that the trend in the jobs/housing index for the region is to become more balanced through 2050 (see Table 4.3-4). Further, development of underutilized sites in downtown Sacramento is consistent with goals and policies of the City's General Plan, Central City Specific Plan, and the CAAP. As evaluated in Impact 4.2-2 of this Draft EIR, the project is consistent with State and local objectives to transform underutilized sites through renovation or redevelopment of existing buildings, and demolition of structures beyond their useful life and transfer of those parcels for higher use. In addition, the project would provide commercial space, an entertainment venue, and educational opportunities to serve employees, residents, scholars, and visitors in the Capitol Area.

New employment opportunities resulting from development of future uses would likely be filled by the existing resident labor pool within Sacramento or within reasonable commute distance. For these reasons, the project would not generate new employment that would induce population growth such that there would be additional demand for housing that could not be met by existing supply or by planned housing development. This impact would be less than significant.

Conclusion

Future development would result in approximately 3,200 new permanent jobs and 1,250 new housing units capable of accommodating approximately 2,750 residents. Although the project would result in some population growth and housing demand, the new employment opportunities are expected to be filled primarily by the existing local and regional labor force, and the proposed housing would provide substantial additional housing within the project area. In addition, the proposed development would be consistent with State, regional, and local plans and policies supporting housing and employment growth and redevelopment of underutilized sites in downtown Sacramento. Therefore, the project would not induce substantial unplanned population growth or generate housing demand that could not be accommodated by existing or planned housing supply. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

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4.4 TRANSPORTATION AND CIRCULATION

This section describes applicable federal, state, and local transportation regulations and policies applicable to the project analysis; discusses the existing roadway network and transportation facilities in the vicinity of the proposed project; and analyzes the potential transportation-related impacts associated with implementing the proposed project. Mitigation measures that would reduce impacts, where applicable, are also discussed.

Comments regarding transportation received in response to the notice of preparation (NOP) addressed construction traffic; locations of driveways; evaluation of any changes to the current circulation system; opportunities for improvements to pedestrian, bicycle, and transit systems and facilities, and the evaluation of vehicle miles travelled (VMT) generated by the project. See Appendix A for all NOP comments received.

4.4.1 Regulatory Setting

FEDERAL

Federal Highway Administration

The Federal Highway Administration (FHWA), an agency of the US Department of Transportation, provides stewardship over the construction and preservation of the nation's highways, bridges, and tunnels. FHWA also conducts research and provides technical assistance to state and local agencies to improve safety, mobility, and livability and to encourage innovation in these areas. FHWA also provides regulation and guidance related to work zone safety, mobility, and temporary traffic control device implementation.

Additionally, federal regulations relating to the Americans with Disabilities Act, Title VI, and environmental justice relate to transit service.

STATE

Senate Bill 375

SB 375 requires metropolitan planning organizations (MPOs) to prepare a sustainable communities strategy (SCS) as part of their regional transportation plans (RTPs). The SCS demonstrates how the region could meet its GHG reduction targets through integrated land use, housing, and transportation planning. Specifically, the SCS must identify land use and transportation strategies that combined with the RTP project list will reduce GHG emissions from automobiles and light trucks in accordance with targets set by the California Air Resources Board (CARB).

Senate Bill 743

SB 743 creates or encourages several statewide changes to the evaluation of transportation and traffic impacts under CEQA. First, it directs the Governor's Office of Planning and Research (OPR), now known and henceforth referred to in this document as the Governor's Office of Land Use and Climate Innovation (LCI), to amend the CEQA Guidelines to establish new metrics for determining the significance of transportation impacts of projects within transit priority areas (TPAs) and allows LCI to extend use of the new metrics beyond TPAs. In the amended CEQA Guidelines, LCI selected VMT as the preferred transportation impact metric and applied their discretion to recommend its use statewide. The California Natural Resources Agency certified and adopted the amended CEQA Guidelines in December 2018. The amended CEQA Guidelines state that "generally, VMT is the most appropriate measure of transportation impacts" and the provisions requiring the use of VMT shall apply statewide as of July 1, 2020. The amended CEQA Guidelines further state that land use "projects within 0.5 mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less-than-significant transportation impact."

Second, SB 743 establishes that aesthetic and parking impacts of a residential, mixed-use residential, or employment center projects on an infill site within a TPA shall not be considered significant impacts on the environment.

Third, SB 743 added Section 21099 to the Public Resources Code, which states that automobile delay, as described by level of service (LOS) or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment upon certification of the CEQA Guidelines by the California Natural Resources Agency. Since the amended CEQA Guidelines were certified in December 2018, LOS or similar measures of vehicular capacity or traffic congestion are not considered a significant impact on the environment.

Lastly, SB 743 establishes a new CEQA exemption for a residential, mixed-use, and employment center project a) within a TPA, b) consistent with a specific plan for which an EIR has been certified, and c) consistent with an SCS. This exemption requires further review if the project or circumstances changes significantly.

PRC Section 21099 defines an employment center and a transit priority area as follows:

- "Employment center project" is a project that is located on a property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area.
- "Transit priority area" is an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a transportation improvement program adopted pursuant to Section 450.216 or 450.322 of 23 CFR.

Technical Advisory on Evaluating Transportation Impacts in CEQA

To aid in SB 743 implementation, LCI released a Technical Advisory on Evaluating Transportation Impacts in CEQA ("Technical Advisory") in December 2018. The Technical Advisory provides advice and recommendations to CEQA lead agencies and practitioners on how to implement SB 743. This includes technical recommendations regarding the calculation of VMT, thresholds of significance, VMT mitigation measures, and screening thresholds for certain land use projects. Lead agencies may consider and use these recommendations at their discretion.

The Technical Advisory identifies screening thresholds to quickly identify when a project is expected to cause a less-than-significant impact without conducting a detailed study. The Technical Advisory suggests that projects meeting one or more of the following criteria should be expected to have a less-than-significant impact on VMT.

- Small projects—Projects consistent with an SCS and local general plan that generate or attract fewer than 110 trips per day.
- Projects near major transit stops—Certain projects (residential, retail, office, or a mix of these uses) proposed within 0.5 mile of an existing major transit stop or an existing stop along a high-quality transit corridor.
- Affordable residential development—A project consisting of a high percentage of affordable housing may be a basis to find a less-than-significant impact on VMT.
- Local-serving retail—Local-serving retail development tends to shorten trips and reduce VMT. The Technical Advisory encourages lead agencies to decide when a project will likely be local-serving, but generally acknowledges that retail development including stores larger than 50,000 square feet might be considered regional-serving. The Technical Advisory suggests lead agencies analyze whether regional-serving retail would increase or decrease VMT (i.e., not presume a less-than-significant impact).
- Projects in low-VMT areas—Residential and office projects that incorporate similar features (i.e., density, mix of uses, transit accessibility) as existing development in areas with low VMT will tend to exhibit similarly low VMT.

The Technical Advisory also identifies recommended numeric VMT thresholds for residential, office, and retail projects, as described below.

- Residential development that would generate vehicle travel exceeding 15 percent below existing residential VMT per capita may indicate a significant transportation impact. Existing VMT per capita may be measured as a regional VMT per capita or as city VMT per capita.

- Office projects that would generate vehicle travel exceeding 15 percent below existing regional VMT per employee may indicate a significant transportation impact.
- Retail projects that result in a net increase in total VMT may indicate a significant transportation impact.

For mixed-use projects, the Technical Advisory suggests either evaluating each component independently and applying the significance threshold for each project type included (e.g., residential and retail), or evaluating VMT associated only with the project's dominant use.

The Technical Advisory also provides guidance on impacts on transit. Specifically, the Technical Advisory suggests that lead agencies generally should not treat the addition of new transit users as an adverse impact. As an example, the Technical Advisory suggests that "an infill development may add riders to transit systems and the additional boarding and alighting may slow transit vehicles, but it also adds destinations, improving proximity and accessibility. Such development also improves regional vehicle flow by adding less vehicle travel onto the regional network."

California Department of Transportation

The California Department of Transportation (Caltrans) is responsible for planning, designing, constructing, operating, and maintaining the State Highway System (SHS). The following Caltrans documents are pertinent to this study:

Vehicle Miles Traveled-Focused Transportation Impact Study Guide (TISG)

The VMT TISG (2020) outlines how Caltrans will review land use projects with a focus on supporting state land use goals, state planning priorities, and GHG emissions reduction goals. The VMT TISG endorses LCI's Technical Advisory as the basis for transportation impact analysis methodology and thresholds including the use of screening to streamline qualified projects because they help achieve the state's VMT reduction and mode shift goals.

REGIONAL AND LOCAL

The buildings on the project site are located on State-owned property and would be demolished by the Department of General Services (DGS) and subsequent development is presumed to be undertaken by the California State University, Sacramento (Sacramento State), another State agency. As explained in Section 4.2, "Land Use and Planning," of this Draft EIR, under Section 4.2.1, "Local," state agencies are not subject to local plans, policies, and zoning regulations. Nevertheless, in the exercise of its discretion, DGS does reference, describe, and address local plans, policies, and regulations that are applicable to the project. This evaluation is also intended to be used by local agencies for determining, as part of their permit processes, the project's consistency with local plans, policies, and regulations.

Sacramento Area Council of Governments

The Sacramento Area Council of Governments (SACOG) is the MPO governing the six-county Sacramento region consisting of El Dorado, Placer, Sacramento, Sutter, Yolo, and Yuba Counties and their 22 cities. SACOG is responsible for preparing the region's RTP/SCS, the most current of which is entitled the 2025 Blueprint (SACOG 2025). The SACOG 2025 Blueprint provides the basis for air quality conformity findings related to the federal Clean Air Act and determinations of whether the region is complying with GHG reduction targets for automobiles and light trucks established under SB 375. Major projects that are inconsistent with the plan could jeopardize the plan's effectiveness for air pollution and GHG reduction.

Sacramento Regional Transit District

The Sacramento Regional Transit District (SacRT) operates public transportation in Sacramento County. SacRT operates over 82 bus routes that serve Sacramento, Citrus Heights, Orangevale, Folsom, Rancho Cordova, and Elk Grove. SacRT operates 43 miles of light rail lines through Sacramento, Rancho Cordova, Folsom, and Elk Grove. SacRT also operates Americans with Disabilities Act (ADA) paratransit services.

The Downtown Riverfront Streetcar Project, overseen by SacRT, would add a new streetcar line between the West Sacramento Bridge District and Sacramento Valley Station, connecting West Sacramento to Sacramento and the SacRT light rail system. The streetcar line is planned to operate on new rail starting along Cabaldon Parkway at Sutter Health Park,

across the Tower Bridge, along Capitol Mall until 3rd Street, where it transitions to N Street and joins existing rail lines along 7th Street, 8th Street, and H Street. New stations are planned at Sutter Health Park, 2nd and Capitol Mall, and N Street & 5th Street. The streetcar will connect to the existing light rail stations at 7th and Capitol, 8th and Capitol, 8th and K, 7th and I, 8th and I, and the Sacramento Valley Station. Construction is expected to begin in early 2027 and be completed in 2030.

City of Sacramento General Plan

The City of Sacramento General Plan (General Plan) was most recently updated and adopted in February 2024. The General Plan serves as a blueprint for future development within the city and the Mobility Element provides the framework for City decisions concerning the citywide transportation system, which includes various transportation modes and related facilities (City of Sacramento 2024). The following Mobility Element policies may be applicable to the proposed project:

- **Policy M-1.2: User Prioritization.** The City shall prioritize mobility, comfort, health, safety, and convenience for those walking, followed by those bicycling and riding transit, ahead of design and operations for those driving.
- **Policy M-1.4: Designing to Move People**. In planning, designing, and managing the transportation system, the City shall prioritize person throughput to shift trips to more efficient travel modes and upgrade the performance of limited street space.
- **Policy M-1.6: Transit Integration.** Wherever feasible, the City shall design buildings, the public realm, streets, and pedestrian access to integrate transit into existing neighborhoods and proposed developments and destinations such as schools, employment centers, commercial centers, major attractions, and public walking spaces to improve access for users by transit.
- **Policy M-1.7: Fine-Grained Network.** As new development and redevelopment occurs, the City shall seek opportunities to create a finer-grained network of streets and walking and bicycling connections, especially within a ½-mile walk of light rail stations and transit stops.
- **Policy M-1.11: Increase Bicycling and Walking.** The City shall strive to increase bicycling and walking citywide so that it can meet its equity, reduced vehicle miles traveled, and sustainability goals.
- **Policy M-1.12: Light Rail Transit (LRT) Station Access Improvements.** Through the development approval process and public and private investments, the City shall foster additional walking and bicycling connections to light rail stations and strengthen existing connections to enhance first/last-mile connectivity and make it easier to travel between the station and surrounding neighborhoods and destinations. As feasible, connections should include pedestrian-level streetlighting and tree shading.
- **Policy M-1.14: Walking Facilities.** The City shall work to complete the network of tree-shaded sidewalks throughout the city, to the greatest extent feasible, by building new sidewalks and crossings, especially within the high-injury network, in disadvantaged communities, near high-ridership transit stops, and near important destinations, such as schools, parks, and commercial areas. Walking facilities should incorporate shade trees.
- **Policy M-1.15: Improve Walking Connectivity.** The City shall require new subdivisions, new multi-unit dwelling developments, and new developments along commercial corridors to include well-lit, tree-shaded walkways where feasible, that provide direct links to the public realm or adjacent public destinations such as transit stops and stations, schools, parks, and shopping centers.
- **Policy M-1.17: Improve Bicycling Connectivity.** The City shall plan and seek funding for a continuous, low-stress bikeway network consisting of bicycling-friendly facilities that connect neighborhoods with destinations and activity centers throughout the city.
- **Policy M-1.18: Bicycling Safety.** When designing projects, the City shall prioritize designs that strengthen the protection of people bicycling such as improvements that increase visibility of bicyclists, increase bikeway widths, raise bikeways, design safer intersection crossings and turns, and separate bikeways from driving traffic wherever feasible.

- **Policy M-1.19: Walking Safety.** When designing projects, the City shall prioritize designs that encourage walking and improve walking safety best practice designs and considerations for efficiencies in walking.
- **Policy M-1.22: Increase Transit Ridership.** The City shall support work to increase transit ridership citywide.
- **Policy M-1.23: Transit Priority.** Where appropriate, the City shall support transit by incorporating features such as bus bulbs, traffic signal priority, queue jumps, and other solutions into priority corridors to improve transit speed, reliability, and operating efficiency while reducing passenger delay.
- **Policy M-1.40: Contributions from New Development.** The City shall require new development to construct or pay a proportionate share of the cost of improvements based on mobility related impacts of the new development.
- **Policy M-2.1: Transportation Demand Management (TDM).** The City should promote the greater use of Transportation Demand Management strategies by employers and residents to reduce dependence on single-occupancy vehicles with the target that 17 percent of all trips are made by transit and active transportation modes by 2030 and 23 percent of all trips are made by transit and active transportation modes by 2045.
- **Policy M-2.3: Vehicle Miles Traveled (VMT) as Metric.** Consistent with state law, the City shall evaluate transportation California Environmental Quality Act (CEQA) impacts using vehicle miles traveled or other metrics as determined by the City, and shall not rely on automobile delay, as described by level of service or similar measures of vehicular delay as a measure of environmental significance. Local Transportation Analyses (LTA) shall continue to be required when necessary to aid in conditioning project entitlements for needed operational improvements.
- **Policy M-2.6: Transit/Event Coordination.** The City shall encourage collaboration between transit partners and event producers to promote awareness of additional and timely transit service before and after large events.
- **Policy M-2.14: Parking Supply.** The City shall balance on-street and off-street parking supply with objectives for reducing vehicle miles traveled (VMT), improving air quality, supporting economic vitality, and fostering a high quality of life throughout the city.
- **Policy M-2.16: Shared Parking.** Through the development review process, the City shall encourage project applicants proposing duplex, multi-unit, mixed use, and non-residential projects to first explore shared-use of existing parking spaces that can be available for dual uses before proposing to construct new parking facilities.
- **Policy M-4.1: Application of Safety.** The City shall design, plan, and operate streets using complete streets principles to ensure the safety and mobility of all users.
- **Policy M-4.8: Detour Facilities.** The City shall design, implement, and maintain construction, work zone, or special event diversions and/ or detour facilities to provide comfortable and convenient passage, prioritizing mobility for active transportation and transit for the duration of construction, work zones, or special events.

Central City Specific Plan

In 2018, the City adopted the Central City Specific Plan (CCSP), a policy document with a planning horizon of 20 years that establishes a future vision for the Sacramento Central City area, which includes the site of the proposed project. The CCSP contains policies relating to connecting gaps in the bicycling network with separated bikeways, improving traffic signage, and connecting gaps in the sidewalk network while enhancing pedestrian infrastructure.

The following policies from the CCSP Mobility section may be applicable to the proposed project:

- **Policy M.1.1: Neighborhood Connections.** Improve connections between the Central City and surrounding neighborhoods, especially for walking, bicycling, and transit trips.
- **Policy M.1.2: Commercial Corridors.** Enhance commercial corridors for safe walking and bicycling while accommodating both through and local traffic.
- **Policy M.1.3: Grid Connectivity.** Preserve and enhance the high level of connectivity provided by the street grid for all travel modes.

- **Policy M.1.4: Curb Cuts for Driveways.** Discourage new curb cuts for driveways for properties with adequate alley access.
- **Policy M.2.2: Neighborhood Streets.** Ensure neighborhood streets are places where people feel safe to walk and bike.
- **Policy M.3.1: Minimize Conflicts.** Promote safety and efficiency for all travel modes by prioritizing modes by block, minimizing conflicts between competing modes on high volume (transit, bike, motor vehicle) routes.
- **Policy M.3.2: Balanced Network.** Reduce the number of lanes dedicated to automobiles in order to regain right-of-way for other modes to balance the network
- **Policy M.4.1: Bicycle Network Projects and Improvements.** Pursue bicycle network projects and improvements that accomplish the following objectives:
    a. Fill gaps in the existing bicycle network by adding new facilities through travel lane reductions and conversions.
    b. Provide new buffered and/or protected bike lanes.
    c. Complete the bicycle network between the Sacramento and American Rivers consistent with adopted plans.
    d. Establish a more complete Low Stress Bicycle Network with appropriate crossing treatments at high volume streets.
- **Policy M.5.1: Pedestrian Network Projects and Improvements.** Pursue pedestrian network projects and improvements that accomplish the following objectives:
    a. Streetscape projects for commercial/ transit streets to improve conditions for walking.
    b. Improve connections between the Central City and surrounding neighborhoods ("Connector Street Enhancements").
    c. Provide new sidewalks where they don't currently exist ("Gap Projects").
    d. Increase sidewalk capacity in areas with high pedestrian volumes ("Activity Center Enhancements").
    e. Shaded sidewalks and improved street lighting.
- **Policy M.5.2: Walkability.** Preserve a high level of walkability across the grid by minimizing pedestrian delay at intersections.
- **Policy M.6.1: Transit Connectivity.** Promote transit connectivity with transit stops and stations that facilitate attractive and convenient transfers between light rail, streetcar, bus services, and that support active transportation connections.
- **Policy M.6.2: Regional Transit Hub.** Preserve and strengthen the role of the Central City as the hub of the regional transit system.
- **Policy M.6.4: Streetcar.** Promote visibility and access to the streetcar line, light rail stations and other key public transit facilities through enhanced pedestrian and bicycle connections, lighting, and wayfinding signage.
- **Policy M.6.5: Transit Vehicle Movement.** Prioritize transit vehicle movement over the private automobile on blocks with high transit vehicle volumes, high transit ridership, or high levels of transit delay, implementing exclusive lanes and priority signalization per the preferred transit network.
- **Policy M.6.6: Development Density and Active Frontage.** Encourage dense development with active ground floor frontage adjacent to transit stations.
- **Policy M.6.11: Access to Transit Stations.** Support safe and convenient pedestrian and bicycle access to/from light rail and streetcar stations while minimizing conflicts between travel modes.

- **Policy M.8.1: Minimize Impacts to On-Street Parking.** Minimize impacts to on-street parking, including residential permit parking, resulting from development with reduced parking requirements.
- **Policy M.8.2: Electric Vehicle Parking and Charging.** Ensure availability of public infrastructure for Zero Emission Vehicles to support multi-family and daytime users, including publicly accessible charging in the right-of-way.
- **Policy M.8.3: Flexible On-street Curb Space.** Promote flexible use of on-street curb space and loading areas in commercial corridors, prioritizing different uses by time of day.
- **Policy M.8.5: Centralized Parking Structures.** Facilitate the development of centralized parking structures to promote shared parking, optimize the use and efficiency of parking areas, and support a "park once" strategy.
- **Policy M.8.6: Lined Parking Structures.** Encourage concealed parking structures that are wrapped with active uses along the street.
- **Policy M.8.10: Shared Parking.** Encourage shared parking and off-street parking solutions for longer term visits.

Streets for People Plan

Streets for the People: Sacramento's Active Transportation Plan (Streets for People Plan) was adopted in December 2025 and establishes the vision for walking, rolling, and bicycling in the city. The Streets for People Plan recommends the following policies that may be applicable to the proposed project:

- **Implement Streets For People Projects:** The City should implement projects recommended in this plan based on the Transportation Priorities Plan process and in combination with any City projects as well as with private development projects.
- **Continue Bike Parking Requirements and Program:** The City should continue to require new development to include long and short-term bicycle parking. The City should also continue to install bike parking through its bike parking program.
- **Implement Forthcoming [Transportation Demand Management] TDM Policies:** The City should implement the policies, programs, and regulations included in the forthcoming Transportation Demand Management Implementation Plan/Report to increase support for travel by walking, biking, and transit. The General Plan and Climate Action & Adaptation Plan mode share goals include increasing active transportation to 6% by 2030 and 12% by 2045; and transit to 11% by 2030.

The Streets for People Plan contains the following planned facilities within the project site vicinity:

- A Class IV separated bikeway on L Street east of 5th Street
- A Class IV separated bikeway on N Street east of 5th Street
- A Class IV separated bikeway on Capitol Mall
- New sidewalks on both sides of Capitol Mall between I-5 and 6th Street
- New sidewalks on both sides of 5th Street between J Street and Capitol Mall
- A new sidewalk on one side of Capitol Mall between 6th Street and 7th Street
- Improved sidewalks on 5th Street between L Street and N Street, and north of J Street
- Improved sidewalks on L Street between 3rd Street and 7th Street

City of Sacramento Work Zone Detour Policy

The City of Sacramento approved a work zone detour policy on May 13, 2025 and this policy took effect on September 1, 2025. The stated purpose of the policy is to support the City's goals around equity and climate including ensuring direct, convenient, and comfortable paths of travel around work zones are maintained for walking and biking.

City of Sacramento Pedestrian Crossing Guidelines

In 2021, the City adopted Pedestrian Crossing Guidelines pertaining to the design and installation of marked crosswalks within the City (City of Sacramento 2021). The guidelines "are not meant to be rigid standards, rather, they provide additional guidance subject to engineering judgement on a case-by-case basis" (page iv). Where applicable, the guidelines reflect pertinent current standards or regulations at the time of preparation of the guidelines. The guidelines include recommendations for marking crosswalks at signalized and stop or yield controlled locations in Section 4.4, "Guidance for Signalized Intersections," on page 33 is as follows:

- Provide marked crosswalks on each approach of the signalized intersection unless a pedestrian crossing is prohibited. See Section 2.6 for more detailed guidance on crossing prohibitions.
- The marked crosswalks should be 12 feet wide with a 10 feet inside clear space. The City Traffic Engineer may consider approving lesser space on a case-by case basis, provided it is not less than 6 feet. See CA MUTCD Section 3B.18 for more information.
- It is recommended to install a 24-inch advanced stop line seven feet in advance of the crosswalk on each approach to a signalized intersection.
- High visibility crossing markings, including the City's standard high visibility triple four crosswalk markings, should be considered on a case-by-case basis at signalized crossings serving a school zone, transit stops and stations, a corridor on the Vision Zero High-Injury Network, and locations with heavy pedestrian volumes as determined by engineering judgement. Different high visibility markings may be used to differentiate controlled crossing types or contexts.
- Supplemental hardware and operational treatments may be considered for signalized crossing locations. Information on the supplemental hardware and operational treatments to help achieve optimal pedestrian crossing service is covered in this guidance's companion document Pedestrian Crossing Guidelines Treatments Application Guide

City of Sacramento Permits

Encroachment Permit

The City of Sacramento requires an encroachment permit to perform work within the public right-of-way (e.g., sidewalk, street, alley, easement) or to use portions of a street for exclusive services in accordance with Section 12.12.020 of the City Municipal Code. The City has two categories of encroachment permits, a major encroachment and minor encroachment and establishes guidelines for applicants to determine the permit appropriate for their proposed project. A minor encroachment is intended for minor work being done within the right-of-way and a major encroachment is for projects that have significant amount of work within the public right-of-way (City of Sacramento 2019a).

Transportation Permit

The City of Sacramento requires a transportation permit when a vehicle and/or vehicle load is larger than established width, heights, and length (City of Sacramento 2018). The transportation permit restrictions and conditions prohibit moving on weekdays from 7:00 a.m. until 9:00 a.m. and from 4:00 p.m. until 6:00 p.m. as well as truck movement on specific roadways (City of Sacramento 2018).

4.4.2 Environmental Setting

ROADWAY SYSTEM

The project site is centrally located in the Sacramento metropolitan area with access to several of the region's major freeways. The key roadways in the study area are described below.

Regional Roadways

Regional access to the project site is provided by Interstate 5 (I-5), Highway 50 (US 50), and State Route 160 (SR 160). Local freeway access is primarily provided by I-5 ramps at I, J, L, P, and Q Streets and US 50 ramps at 5th, 10th, 15th, and 16th Streets. Additional freeway access points include SR 160 at 12th and 16th Streets.

I-5 is the north-south interstate highway that runs on the west side of Downtown Sacramento. I-5 provides access to Yolo County to the north and Elk Grove, Stockton, and San Joaquin County to the south. Near the project site, I-5 is a limited-access freeway and generally consists of ten travel lanes of five mixed-flow lanes in each direction. The US 50/I-5 interchange is southwest of the project site.

US 50 is a major cross-country highway running east-west that provides regional access to Sacramento. Locally, US 50 connects the study area to Yolo County to the west and Rancho Cordova, Folsom, and El Dorado County to the east. Near the project site, US 50 is a limited-access freeway and generally consists of ten travel lanes of five mixed-flow lanes in each direction.

Local Roadways

The following roadways are in the vicinity of the proposed project site:

Capitol Mall is a four-lane, two-way divided roadway that traverses through the proposed project site that provides access between West Sacramento, Old Sacramento, and Downtown. There are Class II bicycle lanes and sidewalks present on both sides of the roadway. Capitol Mall provides direct access to the proposed project site.

L Street is a three-lane, one-way westbound roadway north of the proposed project site. L Street connects to I-5 on-ramps west of the proposed project site. There are sidewalks along both sides of L Street.

N Street is a three-lane, one-way eastbound roadway adjacent to the southern frontage of the proposed project site. There are sidewalks along both sides of N Street. N Street provides direct access to the proposed project site.

O Street is a one-way eastbound roadway located south of the project site and is one of the primary roadways on which the Sacramento Regional Transit (SacRT) Blue and Gold light rail lines operate.

7th Street is a one-way three-lane southbound roadway adjacent to the western frontage of the project site. There are sidewalks along both sides of the street and a dedicated lane for the SacRT light rail.

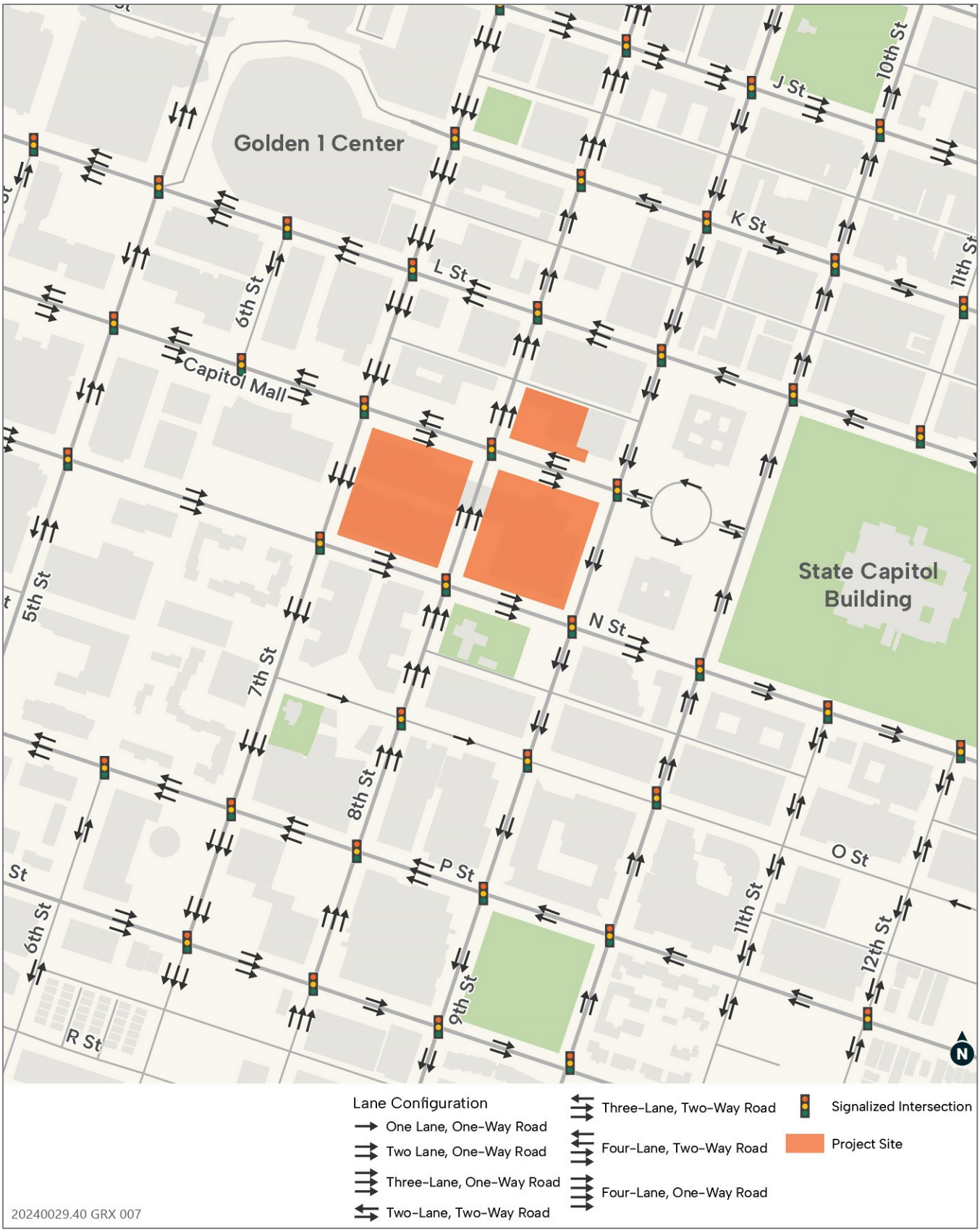
8th Street is a one-way primarily two-lane northbound roadway that runs through the proposed project site. There are sidewalks along both sides of the street.

9th Street is a two-lane, one-way southbound roadway adjacent to the eastern frontage of the proposed project site. There are sidewalks along both sides of the street and a separated bicycle lane along the eastern side of the street.

Figure 4.4-1 illustrates the study roadway facilities, including the number and direction of travel lanes, as well as existing traffic controls present at all study intersections.

Truck Routes

Within the City of Sacramento, there are three types of truck routes: Surface Transportation Assistance Act (STAA) routes, Weight Restricted Routes, and the City Truck Routes (City of Sacramento 2019b). STAA routes allow large trucks to operate on the interstate freeway system and certain primary routes. All federal and state highways within the City of Sacramento have been designated as truck routes by Caltrans, including I-5 and US 50 within the study area. The nearest Weight Restricted Route to the project site is J Street, located approximately 0.25 miles north of the proposed project site. The nearest City Truck Routes are P Street, located approximately 0.17 miles south of the proposed project site.



Source: Produced and provided by Fehr & Peers in 2026; adapted by Ascent in 2026.

Figure 4.4-1 Existing Roadway System

VEHICLE TRAVEL

Table 4.4-1 displays the existing daily residential VMT per resident and work VMT per employee within the study area. The study area used for the VMT calculations is the Sacramento Core Area (Central City Plan Area). As shown, VMT metrics for the core area are lower than the City of Sacramento and SACOG Region.

Table 4.4-1 Sacramento Core Area Vehicle Miles Traveled – Existing Conditions

VMT Metric	Sacramento Core Area	City of Sacramento	SACOG Region
Residential VMT per Resident	15.60	17.81	21.59
Work VMT per Employee	16.41	17.31	19.55

Note: VMT = vehicle miles traveled.

Source: Modified version of SACOG MTP/SCS SACSIM19 Travel Demand Model developed for the City of Sacramento General Plan; Modeled by Fehr & Peers in 2026.

These estimates are from the SACSIM 2020 base year travel forecasting model. SACSIM is an activity/tour-based model that simulates individuals' daily travel accounting for land use, transportation, and demographic factors that influence people's travel behavior. SACOG recently updated SACSIM as part of its 2025 MTP/SCS. As part of this update, SACOG conducted a validation and calibration of the SACSIM 2020 base year travel model that included using household travel surveys, transit boarding data, on-board transit surveys, traffic count data, and VMT estimates from annual Highway Performance Monitory Systems (HPMS) data to verify the SACSIM model reasonably replicated actual travel behavior.

Household VMT is calculated by tallying all household VMT generated by residents living in the area (i.e., only trips by residents). Work VMT accounts for the vehicle trips and trip lengths associated with work-based tours and sub-tours (i.e., trips made as part of one's commute from home to work [including intermediate stops, such as a coffee shop or gas station] or trips made to or from the workplace during the workday).

Average household VMT per resident is calculated by tallying all VMT generated by residents living in the area and dividing that value by the total population living in the area. Average work VMT per Employee is computed by summing the VMT from all work-based tours and sub-tours at a workplace located in the area, then divided by the jobs in the area. This methodology does not account for vehicle travel that occurs outside the SACOG region (i.e., trips by residents or workers of the SACOG region that occur outside the SACOG region).

TRANSIT SYSTEM

Transit service within the study area is predominantly provided by SacRT, but includes a variety of commuter services into downtown Sacramento, including Yolobus, Roseville Transit, El Dorado Transit, Yuba-Sutter Transit, Placer County Transit, San Joaquin Regional Transit District, and Amador Regional Transit System.

Sacramento Regional Transit

Local transit service within the study area is provided by SacRT. SacRT operates over 82 bus routes, 43 miles of light rail, and Americans with Disability Act (ADA) paratransit services within a 440 square-mile service area throughout Sacramento County (SacRT 2026). SacRT also operates Elk Grove Transit, Folsom Transit, and South County Transit Link. Buses operate daily from 5:00 a.m. to 11:00 p.m. every 15 to 60 minutes, depending on the route. Light rail transit trains begin operation at 4:00 a.m. with service every 15 minutes during the day and every 30 minutes in the evening. SacRT operates the following three light rail lines:

- Blue Line – connects to Watt/I-80 Station to the north and Cosumnes River College Station to the south. The Blue Line operates from about 4 a.m. through 12 a.m. Monday through Friday, from about 4:30 a.m. through 12 a.m. on Saturday, and from about 5 a.m. through 10 p.m. on Sunday and holidays. It operates on 15-minute headways during weekdays and 30-minute headways during evenings, weekends, and holidays.

- Gold Line – connects to Sacramento Valley Station (Amtrak) in downtown Sacramento to the west and Historic Folsom Station to the east. During weekdays, every other eastbound trip terminates at Sunrise Station. The Gold Line operates from about 5 a.m. through 12:30 a.m. Monday through Friday, from about 5:45 a.m. through 12:30 a.m. on Saturday, and from about 5:45 a.m. through 10:30 p.m. on Sunday and holidays. It operates on 15-minute headways during weekdays and 30-minute headways during evenings, weekends, and holidays.
- Green Line – connects 13th Street Station in downtown Sacramento and 7th & Railyards Station in the River District. The Green Line operates from about 6 a.m. through 9 p.m. Monday through Friday. No service is provided on Saturday, Sunday, or holidays. It operates on 30-minute headways during weekdays.

The project site is located immediately adjacent to the 8th and Capitol, 7th and Capitol, and 8th and O Stations, which are served by all three light rail lines (Figure 4.4-2). Near the project site, light rail travels southbound on 7th Street, northbound on 8th Street, and both eastbound and westbound on O Street (with the exception of O Street between 7th and 8th Streets, where light rail travels eastbound only). Light rail operates in mixed-flow traffic on 7th and 8th Streets near the project site. Dedicated roadway space is allocated for light rail on O Street between 7th Street and 12th Street.

All light rail crossings at intersections near the project site are at-grade crossings without crossing gates and are equipped with passive warning devices. The crossings where J Street, K Street, L Street, Capitol Mall, and N Street intersect light rail on 7th Street and 8th Street are signalized with light rail vehicle preemption. The intersections of O Street at 8th, 9th, and 10th streets are also signalized with light rail vehicle preemption. The light rail crossings at the intersection of 7th Street and O Street is unsignalized.

Multiple bus routes provided by SacRT serve the study area and have bus stops close to the project site. Service details for these routes are summarized in Table 4.3-2. The 8th Street and N Street bus stop along 8th Street serves SacRT Bus Routes 11, 51, 102, 103, 106, 109, 129, 134, and E10 through E18. The 8th Street and Capitol Ave bus stop and the 8th Street and O Street bus stops are located along 8th Street and serve the same bus routes. The 7th Street and Capitol Ave bus stop and the 7th Street and O Street bus stops are located along 7th Street and serve SacRT Bus Routes 11, 51, 102, 103, 106, 109, and 134. The 9th Street and N Street bus stop along 9th Street serves SacRT Bus Routes E10 through E18. The L Street and 9th Street stop and the L Street and 10th Street stops are located on L Street and serve SacRT lines 30, 38, 62, 86, 88, and 142.

As discussed in the Regulatory Setting section above, SacRT is overseeing the Downtown Riverfront Streetcar Project, which would operate on new rail starting along Cabaldon Parkway at Sutter Health Park in West Sacramento, crossing the Tower Bridge, and running along Capitol Mall until 3rd Street, where it would transition to N Street and join existing rail lines along 7th Street, 8th Street, and H Street. New stations are planned at Sutter Health Park, 2nd & Capitol Mall, and N Street & 5th Street. The streetcar will connect to the existing light rail stations at 7th & Capitol, 8th & Capitol, 8th & K, 7th & I, 8th and I, and the Sacramento Valley Station. Construction is expected to begin in early 2027 and be completed in 2030.

Figure 4.4-2 displays the locations of existing rail transit service and existing local and commuter bus routes within the study area.



Source: Produced and provided by Fehr & Peers in 2026; adapted by Ascent in 2026.

Figure 4.4-2 SacRT Light Rail Facilities in the Project Area

Table 4.3-2 SacRT Bus Service within Quarter-Mile of the Project Site

Route	Connection	Weekday Peak-Hour Frequency (Minutes)	Weekday Service Span Begins	Weekday Service Span Ends	Weekend Service Span Begins Saturday (Sunday)	Weekend Service Span Ends Saturday (Sunday)
11	Natomas Club Center, North Park	30	5:35 a.m.	8:50 p.m.	6:55 a.m.	8:40 p.m.
30	California State University	30	5:55 a.m.	9:50 p.m.	6:30 a.m.	9:25 p.m.
38	University/65th Street Light-Rail Station Upper Land Park	30	5:30 a.m.	10:20 p.m.	6:45 a.m.	9:20 p.m.
51	Florin Area, Oak Park, Broadway Area	15	5:35 a.m.	10:35 p.m.	6:15 a.m.	10:50 p.m. (9:35 p.m.)
62	Pocket Area, Sacramento City College	30	5:40 a.m.	9:30 p.m.	7:15 a.m.	10:05 p.m.
86	Marconi/Arcade Light-Rail Station	30	5:35 a.m.	10:10 p.m.	6:40 a.m. (6:55 a.m.)	9:50 p.m. (9:05 p.m.)
88	Del Paso Heights	30	5:40 a.m.	9:50 p.m.	6:45 a.m. (7:45 a.m.)	9:55 p.m. (9:20 p.m.)
102	Riverside Commuter	60	5:30 a.m.	7:10 p.m.	N/A	N/A
103	Riverside Express	10-20	6:15 a.m. 4:20 p.m.	7:55 a.m. 5:45 p.m.	N/A	N/A
106	Land Park Commuter	60	7:05 a.m. 3:04 p.m.	8:54 a.m. 5:45 p.m.	N/A	N/A
109	Hazel Express	30	6:25 a.m. 4:35 p.m.	7:55 a.m. 6:20 p.m.	N/A	N/A
129	Arden Commuter	30	6:2 a.m. 4:35 p.m.	7:40 a.m. 6:10 p.m.	N/A	N/A
142	Airport	60	5:35 a.m.	11:20 p.m.	5:30 a.m.	11:20 p.m.
E10	Civic Center and Big Horn Commuter	60	5:35 a.m. 5:35 p.m.	7:30 a.m. 5:35 p.m.	N/A	N/A
E11	Franklin Library Commuter	30	7:50 a.m. 3:35 p.m.	5:55 a.m. 5:55 p.m.	N/A	N/A
E12	Civic Center and Laguna Blvd Commuter	30	6:10 a.m. 4:05 p.m.	7:45 a.m. 5:35 p.m.	N/A	N/A
E13	Elkmont Way Commuter	30	5:45 a.m. 3:40 p.m.	7:15 a.m. 5:15 p.m.	N/A	N/A
E14	Bruceville and Big Horn Commuter	60	5:45 a.m. 3:45 p.m.	7:40 a.m. 5:40 p.m.	N/A	N/A
E15	Bond and Bradshaw Commuter	30	6:15 a.m. 4:10 p.m.	7:40 a.m. 5:40 p.m.	N/A	N/A
E16	Elk Grove Library Commuter	30	6:30 a.m. 4:00 p.m.	8:00 a.m. 5:35 p.m.	N/A	N/A
E17	Calvine Commuter	60	6:30 a.m. 4:15 p.m.	8:20 a.m. 6:10 p.m.	N/A	N/A
E18	Downtown to Longleaf Commuter	N/A	6:40 a.m. 4:40 p.m.	7:20 a.m. 4:40 p.m.	N/A	N/A
GSCE	Galt Sacramento Commuter Express	30-60	6:25 a.m. 3:40 p.m.	8:35 a.m. 6:35 p.m.	N/A	N/A

Note: Route 134 does not run in the summer.

Source: Data provided by Fehr & Peers in 2026.

Other Regional Transit

In addition to SacRT, several other transit agencies, including Yolobus, Roseville Transit, El Dorado Transit, Yuba-Sutter Transit, Placer County Transit, and San Joaquin Regional Transit District, offer commuter service into downtown Sacramento. These bus routes generally run only during the peak a.m. and p.m. commute periods on weekdays to serve employees commuting into downtown Sacramento from throughout the greater Sacramento region. The regional transit routes near the project site and the bus stops they serve are depicted in Figure 4.4-2. Bus stops served by other regional transit agencies that operate close to the project site are listed in Table 4.4-3.

Table 4.4-3 Other Regional Transit Bus Stops within Two Blocks of the Project Site

Bus Stop	Location in Relation to Project Site	Routes Serving Stop
N St and 7th St	Adjacent to the southern frontage of site	Roseville Transit Commuter Route and Yolobus Routes 40, 41, and 240
8th St and Capitol Mall	On the project site west of 801 Capitol Mall	Roseville Commuter Route and El Dorado Transit Sacramento Commuter (both regular and reverse routes)
9th St and Capitol Mall	Eastern frontage of site	Yolobus Routes 43-45 and 230
N St and 7th St	Northern frontage of project site across the street	Yolobus Routes 40-45, 230, and 240
8th St and O St	One block south of the project site	San Joaquin Regional Transit District 163
P St and 9th St	Two blocks south of the project site	Placer County Transit Placer Commuter Express and Yuba-Sutter Transit Sacramento Commuter Express

BICYCLE SYSTEM

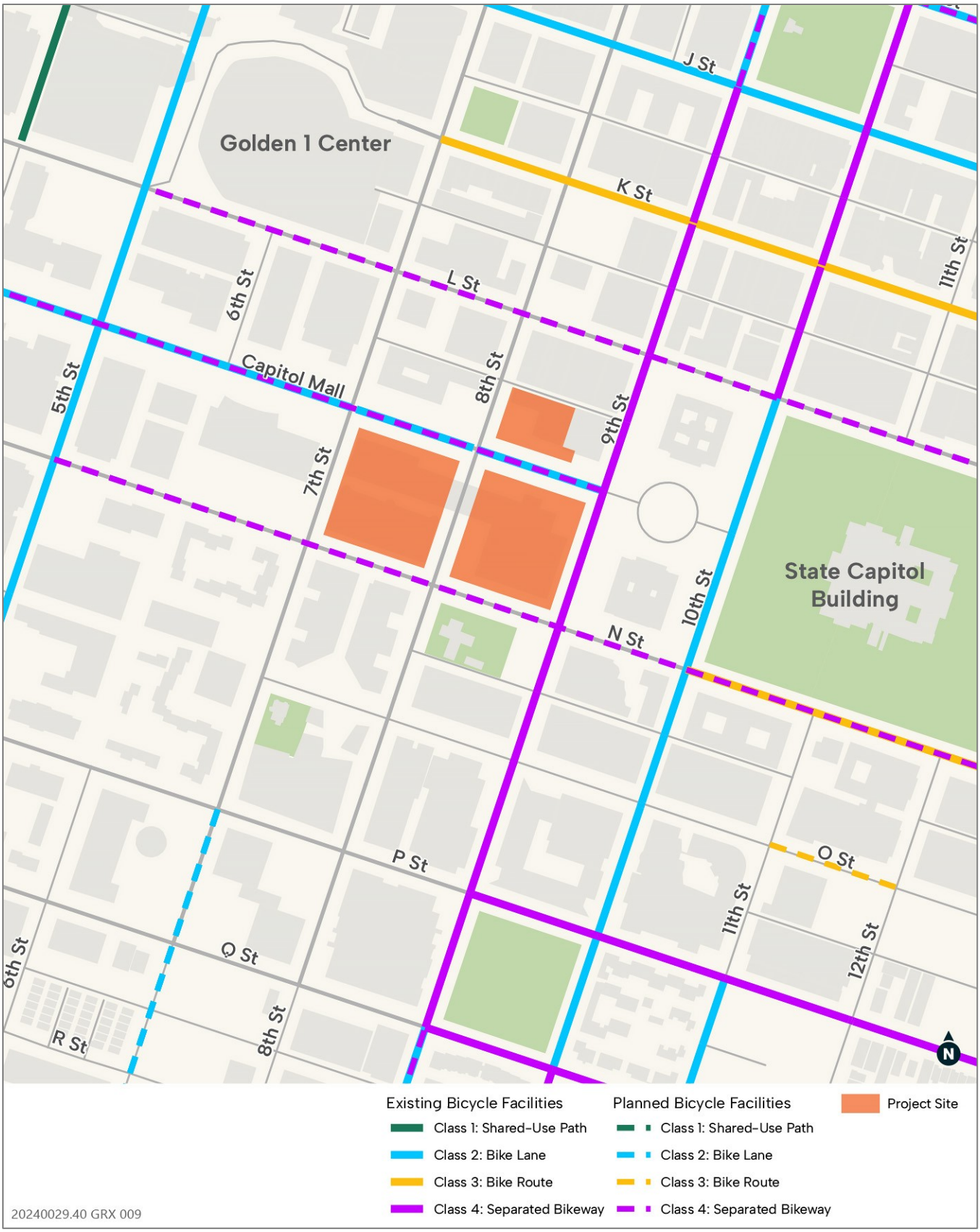
The City Streets for People Plan classifies bicycle facilities into the following five types (based on Caltrans definitions) (City of Sacramento 2025):

- **Shared-Use Paths (Class I):** Paths shared by people walking and biking completely separated from motor vehicle traffic.
- **Bike Lanes: (Class II)** Dedicated lane for bike travel adjacent to traffic. Separated from traffic or parking by painted lane line or buffer.
- **Buffered Bike Lanes (Class IIB):** Dedicated lane for bike travel adjacent to traffic. Separated from traffic or painted lane line or buffer.
- **Bike Routes (Class III):** Signed and/or marked streets where drivers share the travel lane with people biking.
- **Separated Bikeways (Class IV):** On-street bike lane separated from motor vehicle traffic by curb, median, planters, parking, or other physical barrier.

As of 2025, the City of Sacramento bicycle network is composed of 449 miles of existing facilities for people biking including 91 miles of shared-use paths, 12 miles of separated bikeways, 7 miles of buffered bike lanes, 257 miles of bike lanes, and 82 miles of bike routes (City of Sacramento 2025: 20).

The project site is served by a variety of bicycle facilities. Figure 4.4-3 displays the locations of existing and planned bicycle facilities in the study area.

Class II bike lanes exist near the project site along 5th Street, 10th Street (south of L Street), and 11th Street (south of P Street) in the north/south direction and along Capitol Mall and J Street in the east/west direction. Class III bike routes provide an east/west connection along K Street between 8th Street and 12th Street. Class IV parking-protected bikeways are present near the project site on 9th Street, 10th Street (north of L Street), P Street (east of 9th Street), and Q Street (east of 9th Street). In the future, there are plans to add Class IV bikeways to N Street, Capitol Mall, and L Street and a Class I bike route on O Street between 11th Street and 12th Street (Streets for People).



Source: Produced and provided by Fehr & Peers in 2026; adapted by Ascent in 2026.

Figure 4.4-3 Existing and Planned Bicycle Facilities

PEDESTRIAN SYSTEM

The high level of connectivity provided by the study area's gridded street system, concentration of land uses, and provision of consistent high-quality pedestrian facilities results in higher levels of pedestrian travel within the study area relative to other portions of the City. According to data from the 2020 Census, 15 percent of the residents within the Central City (which encompasses midtown and downtown) walk to work on a regular basis, which is approximately five times the rate of the city as a whole.

There are sidewalks on both sides of all roadways surrounding the proposed project site, with sidewalk widths typically ranging between 6 and 15 feet, meeting the 6-foot-width requirement in the City design standards (Section 15.6.7, 2009). Sidewalks are present on all streets adjacent to the project site. Near the project site, sidewalks are generally separated from the roadway by on-street parking, bike lanes, and/or landscaped planter strips. These streetscape features, including shade trees, increase pedestrian comfort.

Traffic signals within the study area operate on relatively short cycle lengths, and all have automatic walk signals for pedestrians. Combined, these features result in low levels of crossing delay for pedestrians. Within the vicinity of the project site, marked crosswalks are provided on all approaches at most intersections, including Capitol Mall intersections at 7th Street, 8th Street, and 9th Street and N Street intersections at 7th Street, 8th Street, and 9th Street. Walk signals are present at all signalized intersections within the study area.

4.4.3 Environmental Impacts and Mitigation Measures

ANALYSIS METHODOLOGY

The transportation impact analysis methodology includes a combination of quantitative and qualitative evaluations of the transportation system. The specific analysis methods are described below.

Bicycle and Pedestrian Facilities

The impact assessment for bicycle and pedestrian travel considers existing and planned bicycle and pedestrian facilities and reviews the project to determine whether it would physically disrupt an existing facility or prevent the implementation of a planned facility.

Transit Service and Facilities

The impact assessment for transit considers existing and planned transit facilities and services, and reviews the project to determine whether it would physically disrupt an existing service or facility or prevent the implementation of a planned service or facility.

VMT Impact Assessment

As discussed above, LOS can no longer be used for evaluating project traffic impacts under CEQA with the passage of SB 743 and adoption of the amended CEQA Guidelines implementing SB 743 (see CEQA Guidelines Section 15064.3). Per CEQA Guidelines Section 15064.3(c), the provisions in Section 15064.3 recommending VMT as the primary metric for analyzing traffic impacts applies as of July 1, 2020.

This analysis relies on guidance provided in the LCI Technical Advisory to assess the project's VMT impact. Specifically, this analysis considers the following.

- Does the project meet one or more of the screening thresholds identified in the Technical Advisory such that a detailed analysis is not necessary?
- If so, what information or data are available to support the conclusion that the project meets the screening threshold and should be considered to have a less-than-significant transportation impact relative to VMT?

- If the project does not meet one or more of the "screening thresholds," the analysis would proceed to a detailed analysis of the project's VMT impact. This includes quantifying the project's VMT generation and determining whether this VMT generation would exceed the recommended thresholds of significance in the Technical Advisory (i.e., 15 percent below existing regional VMT per capita/employee).

VMT Screening Analysis

The Technical Advisory identifies "screening thresholds" to quickly identify when a project should be expected to cause a less-than-significant impact without conducting a detailed study. As described above in the Regulatory Setting section, the Technical Advisory suggests the following projects should be expected to have a less-than-significant impact on VMT.

- Small projects
- Projects near major transit stops
- Affordable residential development
- Local-serving retail
- Projects in low-VMT areas

Of these project types, only the criterion for projects near major transit stops are codified in the updated CEQA Guidelines. The remaining criteria for small projects, affordable residential development, local-serving retail, or projects in low-VMT areas are not codified in the CEQA Guidelines but are suggested by LCI based on research cited in the Technical Advisory.

For mixed-use projects, the Technical Advisory suggests evaluating each component independently and applying the screening threshold for the applicable land use type. The Technical Advisory alternatively suggests that the lead agency may consider only the project's dominant use.

Of these screening criteria, the following potentially apply to either some, or all of, the development scenario land uses considered for the project site.

- Projects near major transit stops
- Local-serving retail
- Projects in low-VMT areas

The project does not qualify as a small project for screening purposes, and it is unknown whether all residential units would be restricted as affordable units. Therefore, this analysis does not rely on these screening criteria and does not discuss these criteria further.

Presumption of Less-Than-Significant Impact Near Existing Major Transit Stops

CEQA Guidelines Section 15064.3(b)(1) states that lead agencies should generally presume projects within 0.5-mile of an existing major transit stop or a stop along an existing high quality transit corridor will have a less-than-significant transportation impact. This presumption assumes development with better access to high quality transit service is likely to result in more transit mode share and a reduction in VMT.

The Technical Advisory states this presumption would not apply "if project-specific or location-specific information indicates that the project will still generate significant levels of VMT." For example, the presumption may not be appropriate if the project has or does any of the following.

- Has a floor area ratio of less than 0.75.
- Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking).
- Is inconsistent with the applicable SCS as determined by the lead agency, with input from the MPO.
- Replaces affordable residential units with a smaller number of moderate- or high-income residential units.

The light rail stations along SacRT's Blue, Gold, and Green lines qualify as major transit stops per the definition in the CEQA statute (Public Resources Code Section 21064.3). The entirety of the project site is located within 0.5 mile of the 7th and Capitol and 8th and Capitol light rail stations.

The following addresses the project characteristics that could negate the use VMT screening for major transit stops:

- The buildings included in the project development scenario would be multiple floors in height and the building footprints would occupy the majority of the project site. Thus, the project development scenario would very likely have a floor area ratio greater than 0.75.
- While details on the number and type of on-site parking is unknown at this time, it is expected that it would be similar to or less than parking provided for similar existing uses in the area. Therefore, it is anticipated that the project would not include more parking for use by residents, customers, or employees of the project than required for other similar land uses or the jurisdiction with authority over the property.
- The project would include the redevelopment, densification, and revitalization of underutilized sites within the Sacramento urban core, supporting several SACOG 2025 Blueprint (MTP/SCS) goals. Additionally, the project would not cause exceedance of growth targets identified in the SACOG 2025 Blueprint.
- The project would replace multiple nearly vacant office buildings. Therefore, the project would not involve replacement of affordable residential units.

Therefore, the project qualifies as being near existing major transit stops and none of the applicable exceptions apply.

Presumption of Less-Than-Significant Impact for Local-Serving Retail

The Technical Advisory states that "new retail development typically redistributes shopping trips rather than creating new trips," and that "local-serving retail development tends to shorten trips and reduce VMT" by "adding retail opportunities into the urban fabric and thereby improving retail destination proximity." On the other hand, the Technical Advisory notes that regional-serving retail development "can lead to substitution of longer trips for shorter ones" and "may tend to have a significant impact." The Technical Advisory further states that "retail development including stores larger than 50,000 square feet might be considered regional-serving."

The development scenario evaluated in this EIR includes approximately 147,000 gross square feet (GSF) of ground floor retail space out of the roughly 3,630,000 GSF of development at full implementation. The development scenario assumes that this retail space will have a depth of approximately 60-feet from the sidewalk frontage to the "back" of the space, which would not support the type of large-scale spaces typically accommodating regional serving retail. At a 60-foot depth, a ground floor retail space would need to run continuously for almost 3-blocks to generate 50,000 square feet of space. It is anticipated that this commercial retail space will in large part serve the project occupants and residents, employees, and visitors of the immediate surrounding downtown Sacramento area. Therefore, it is reasonable to conclude that the commercial retail component of the project would primarily be local-serving in nature.

Presumption of Less-Than-Significant Impact for Projects in Low-VMT Areas

The Technical Advisory states that "residential and office projects that locate in areas with low VMT, and that incorporate similar features (i.e., density, mix of uses, transit accessibility), will tend to exhibit similarly low VMT" and that "new development in such locations would likely result in a similar level of VMT."

Table 4.4-1 shows existing (2020) household VMT per resident and work VMT per employee in the Sacramento Core Area (where the project site is located), in the City of Sacramento overall, and in the SACOG Region. As described in the Environmental Setting section, these per capita and per employee VMT metrics, recommended by OPR, in the Sacramento Core Area are 15 percent or more below the existing regional average VMT per capita/employee (i.e., the SACOG Region VMT). Based on the Technical Advisory threshold recommendations for residential and employment uses, and further analysis below, the Sacramento Core Area, including the project area, would be considered a low-VMT area.

The data presented in Table 4.4-1 shows the household VMT per resident for this same area is approximately 28 percent below the regional average.[1] Per the Technical Advisory, residential VMT per capita may be measured against the region or city.

The data presented in Table 4.4-1 shows the work VMT per employee is approximately 16 percent below the regional average.[2] Per the Technical Advisory, workplace VMT per employee should be compared to the geography over which most workers would be expected to live. In most cases, this will be a region, but in some cases, "it might be appropriate to refer to a smaller geography, such as the county, that includes the area over which nearly all workers would be expected to live." According to the US Census Bureau Longitudinal Employer-Household Dynamics (LEHD) dataset, of the workers who work in the Sacramento Core Area, approximately 25 percent live within the City of Sacramento and 75 percent live outside of the City of Sacramento (US Census Bureau 2023). Moreover, approximately 57 percent live within Sacramento County and 43 percent live outside of Sacramento County. Similar home-work place trends would be anticipated for project employees. Therefore, this assessment compares the work VMT per employee against the regional average workplace VMT per employee.

Based on this information, the study area can generally be considered a low-VMT area.

Other Impacts

Potential transportation impacts related to transportation hazards, emergency access, and construction activity are based on a review of project changes to the transportation network and a qualitative assessment of whether those changes would conflict with applicable standards or result in detrimental conditions based on the thresholds of significance.

THRESHOLDS OF SIGNIFICANCE

The significance thresholds used to evaluate the project impacts on transportation under CEQA are generally based on Appendix G of the CEQA Guidelines, with the exception of the construction activity threshold. A transportation-related impact is considered significant if implementation of the Capitol Mall Office Buildings Demolition Project would do any of the following:

- conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;
- conflict or be inconsistent with CEQA Guidelines Section 15064.3(b) regarding VMT;
- substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment);
- result in inadequate emergency access; or
- result in construction activity that could cause temporary impacts to transportation and traffic.

This analysis considers the significance criteria obtained from Appendix G to identify refined thresholds of significance for each criterion. These thresholds are identified below.

Conflict with Existing and Planned Facilities

The project would result in a significant transportation impact if it would do any of the following:

- substantially physically disrupt an existing bicycle facility, pedestrian facility, or transit service/facility; or
- substantially interfere with the implementation of a planned bicycle facility, pedestrian facility, or transit service/facility.

[1] Central City Specific Plan Area = 15.60 VMT per capita; SACOG region = 21.59 VMT per capita. Household VMT Regional Average Comparison: (15.60/21.59) – 1 = -27.70 percent.

[2] Central City Specific Plan Area = 16.41 VMT per employee; SACOG region = 19.55 VMT per employee. Workplace VMT Regional Average Comparison: (16.41/19.55) - 1 = -16.10 percent.

Note that the Technical Advisory suggests the addition of new transit riders or incurring additional delay from increased boardings and alightings is not considered an adverse impact. However, maintaining transit level and quality of service is necessary to retain and expand ridership. Failure to meet performance standards established by the transit operator could lead to losses of ridership and increases in travel by other modes (e.g., automobiles), which could result in environmental effects such as increased emissions.

VMT Impacts

CEQA Guidelines Section 15064.3(b) outlines criteria for analyzing transportation impacts using VMT. For land use projects, VMT exceeding an applicable threshold of significance may indicate a significant impact.

DGS has not formally adopted guidance or thresholds related to VMT impact analysis (i.e., tailored screening criteria, preferred metrics and calculation methods, and use-specific thresholds). Therefore, this analysis relies on guidance from the Technical Advisory.

Per the Technical Advisory, the project would result in a significant transportation impact if it would do any of the following:

- generate vehicle travel exceeding 15 percent below existing regional household VMT per capita for residential uses;
- generate vehicle travel exceeding 15 percent below existing regional work VMT per employee for employment uses; or
- include retail development that would result in a net increase in total VMT.

The transportation impact assessment evaluates household VMT per capita for residential uses and work VMT per employee for employment uses for potential VMT impacts per the Technical Advisory as guidance. Household VMT and work VMT are VMT metrics that only capture specific users and/or trip purposes. A separate VMT metric, total VMT, which accounts for all vehicle trips generated by the project and their associated trip length, is used as an input into the air quality, GHG, and energy analyses to determine the impact of the project's mobile emissions and mobile energy consumption, as described in these resource sections. Readers should refer to these other resource sections for more information about how the project's travel characteristics affect those specific topics. Because each chapter is focused on a specific environmental effect with its own specific metrics, thresholds, or significance criteria, it is possible to have a different conclusion for transportation impacts than other resource topics that also reference project-related travel.

Hazards Impacts

The project would result in a significant transportation impact if it would do any of the following:

- result in a geometric design feature that is inconsistent with applicable design standards; or
- result in a change to the volume, mix, or speed of traffic that is not compatible with the existing facility design.

Emergency Access Impacts

The project would result in a significant transportation impact if it would result in roadway and transportation facilities that impede access for emergency response vehicles.

Construction Impacts

The project would result in a significant transportation impact if construction-related activity would do any of the following:

- result in hazardous conditions for motorists, bicyclists, pedestrians, or transit users.; or
- inhibit access for emergency response vehicles.

ISSUES NOT DISCUSSED FURTHER

All issues related to transportation are discussed in this analysis.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 4.4-1: Conflict with a Program, Plan, Ordinance, or Policy Addressing the Circulation System, Including Transit, Roadway, Bicycle, and Pedestrian Facilities

Implementation of the project could potentially physically disrupt existing pedestrian facilities, bicycle facilities, and transit services and facilities. Disruptions could occur during typical daily operations as well as during event days. Additionally, the project may interfere with the planned Downtown Riverfront Streetcar Project. This impact would be potentially significant.

Demolition

The effects of the demolition phase of the project on bicycle facilities, pedestrian facilities, and transit service and facilities are addressed below in the discussion of Impact 4.4-5.

Future Development

Construction

The effects of construction of future development on the transportation system would be very similar to those from demolition of the existing buildings on the project site. Therefore, the effects of future facility construction on bicycle facilities, pedestrian facilities, and transit service and facilities are also addressed below in the discussion of Impact 4.4-5.

Operation

Bicycle Facilities

Implementation of the project would generate new bicycle trips to and from the project site. Bicycle trips associated with the student housing, market-rate housing apartments, and ground floor retail project components would occur throughout the day on weekdays and weekends. Bicycle trips associated with the commercial Office Space and Academic project components would be concentrated during typical commute periods on weekdays. Bicycle trips associated with the conference and event center and indoor performing arts and music venue would be concentrated during the pre- and post-event peak periods on event days.

As previously documented, the project site is served by the extensive downtown Sacramento bicycle network, including Class II bike lanes and Class IV parking-protected separated bikeways near the project site on Capitol Mall, 9th Street, 10th Street, P Street, and Q Street. The City of Sacramento Streets for People Plan (2025) includes recommendations to add Class IV separated bikeways on N Street, Capitol Mall, and L Street in the project vicinity. Together, these facilities would provide bicycle access to and from the project site and serve new project-generated bicycle trips.

The project would host regular events at its on-site conference and event center and indoor performing arts and music venue. The conference and event center, as evaluated in this EIR, would have a maximum occupancy of approximately 2,000 persons and is assumed to be in use approximately 335 days a year. The indoor performing arts and music venue, as evaluated in this EIR, has a maximum occupancy of approximately 8,000 persons and is assumed to be in use approximately 260 days a year.

Potential temporary physical disruptions to bike facilities could occur due to events at the conference and event center and indoor performing arts and music venue. Currently, events occur throughout the year on or adjacent to Capitol Mall, with temporary closures of streets and bike lanes, with the type and scale of right-of-way closures depending on the event. Examples of Capitol Mall events include seasonal weekly Wednesday Farmers Markets, the Golden Harvest Parade and Music Festival, Sacramento Pride Festival, and Mardi Gras Parade, which all include partial closures of streets and sidewalks along the Capitol Mall. Additionally, portions of the study area, including 7th Street

and L Street, have modified traffic control regularly due to concerts, basketball games, and other events at the Golden 1 Center. While the details of future development-related event traffic management strategies are not known at this time, it is likely that event traffic management strategies would be similar to those for other existing events and event venues within the project site vicinity.

Similarly, increases in project-generated vehicle trips would occur during the pre- and post-event time periods as event attendees travel to and from the project site. A small portion of event-related vehicle trips may utilize on-site parking facilities; however, a majority would use off-site parking facilities within the vicinity of the project site. Project events would also generate demand for Transportation Network Company (TNC) trips (i.e., Uber and Lyft), which would utilize curb space near the project site for passenger pick-up and drop-off activity. Event-related vehicle trips would physically mix with bicycle facilities, creating potential conflict points at locations such as project driveways and curbside passenger loading zones.

Beyond the land use scenario described in Chapter 3, Project Description, further details regarding the redevelopment of the project site are not known at this time, including potential modifications to the project site frontages; the location and size of on-site parking facilities; the placement of vehicle ingress and egress locations; the location, type, and availability of bicycle parking facilities; and the placement of curbside passenger loading zones. Moreover, details regarding project event traffic management (e.g., potential temporary traffic control devices, lane closures, detours, etc.) are not available at this time. Therefore, the extent to which the redevelopment of the project site could physically disrupt an existing or planned bicycle facility cannot be fully identified at this time. Therefore, this would be considered a **potentially significant** impact.

Pedestrian Facilities

The project would generate a substantial amount of new pedestrian activity within the immediate vicinity of the project site. Project-generated pedestrian trips would travel to and from the project site from adjacent land uses, parking facilities, and transit stops/stations. Additionally, students, employees, and visitors would walk between buildings across the three blocks of the project site (for example, student housing may be on a different block from the School of Public Affairs, or employees in the Commercial Office Space would walk to ground floor retail on a different block.) Some project employees and students may commute by foot from nearby residential neighborhoods, and project employees, students, and visitors would walk between the project site and nearby parking facilities, bus stops, and light rail stations. Higher levels of pedestrian demand would occur during pre- and post-event time periods before and after events at the project's on-site event venues. Generally, the surrounding network of sidewalks, crosswalks, and automatic pedestrian walk signals would provide a high-quality pedestrian environment for project employees, students, visitors, and event attendees.

Potential temporary physical disruptions to sidewalks and crosswalks could occur due to events at the conference and event center and indoor performing arts and music venue. As discussed in the "Bicycle Facilities" section above, currently, events occur throughout the year on or adjacent to Capitol Mall, with temporary closures of streets and sidewalks, with the type and scale of right-of-way closures depending on the event. Also as discussed above, while the details of project event traffic management strategies are not known at this time; however, it is expected that event traffic management strategies would be similar to those for other existing events and event venues within the project site vicinity.

The City of Sacramento Streets for People Plan (2025) includes recommendations to build or improve sidewalks in the project vicinity, but not along the project frontage. Future development of the project is not anticipated to interfere with the implementation of planned sidewalks or sidewalk improvements.

While the project would not interfere with any planned sidewalk improvements, project events would have the potential to disrupt existing pedestrian facilities. Therefore, this would be considered a **potentially significant** impact.

Transit Service and Facilities

Implementation of the project would generate demand for additional transit passenger trips as a result of the new employees, students, visitors, and event attendees. Transit trips associated with the Student Housing, Market Rate Housing Apartments, Hotel, and Ground Floor Retail project components would occur throughout the day on

weekdays and weekends. Transit trips associated with the Commercial Office Space and Academic project components would be concentrated during typical commute periods on weekdays. Transit trips associated with the conference and event center and indoor performing arts and music venue would be concentrated during the pre- and post-event peak periods on event days.

Multiple transit options exist within the immediate project site vicinity, including the SacRT Blue, Gold, and Green light rail lines, multiple SacRT local bus routes, and numerous regional commuter bus routes. The project does not propose new or expanded transit service, thus, new transit passenger demand generated by the project would rely on existing or planned transit services. At project build-out, on-site buildings and facilities would not physically interfere with any existing transit services or facilities.

At project build-out, new project-generated vehicle trips associated with regular daily operations would increase peak hour delay on roadways surrounding the site, including roadways used by existing bus and light rail service. Increased delays would be concentrated during typical weekday a.m. and p.m. peak hours as well as pre- and post-event time periods during project event days. These potential increases in overall travel time could adversely affect bus transit operations and performance by increasing transit travel times and reducing transit travel reliability.

SacRT establishes on-time performance standards as indicators for service reliability. On-time performance for SacRT is measured at time points. A SacRT vehicle is considered on-time if it leaves its time point between 0 and 5 minutes late. For FY 2025, SacRT's target is for the bus system to be 80 percent on-time or better and for the light rail system to be 95 percent on-time or better. In FY 2025, systemwide on-time performance for SacRT bus routes and light rail service was 74.24 percent and 94.54 percent, respectively, below their respective on-time performance targets. Additional peak hour vehicle trips and, in turn, vehicle delay generated by the project, could further exacerbate service reliability issues for existing SacRT bus and light rail services that operate on roadways surrounding the project site.

An exceedance of established transit service standards would cause transit services to operate below acceptable performance targets, which could be deleterious to the transit passenger experience (e.g., poor reliability, long travel times). For passengers who are sensitive to these factors, a degradation of service quality could cause them to choose other modes of transportation that generally cause greater adverse effects on the environment such as driving. Passengers choose to use transit due to a variety of factors and personal preferences, including community context (e.g., urban versus suburban), accessibility, convenience, travel time, and costs of modal options. Because transit passenger expectations regarding service quality will vary, the extent to which a degradation of service quality would affect existing and prospective transit ridership, as well as associated adverse environmental effects, is uncertain.

Additionally, events at the on-site event venues could cause temporary disruptions to existing transit services or facilities due to event-related travel demand and traffic management strategies. The extent to which project events could physically disrupt existing transit services and facilities cannot be fully determined at this time due to a lack of a detailed project site plan and information regarding project event programming and traffic management strategies.

The project also has the potential to interfere with the implementation of the planned Downtown Riverfront Streetcar Project. The streetcar project, overseen by SacRT, is planned to operate on new rail along Cabaldon Parkway at Sutter Health Park in West Sacramento, across the Tower Bridge, and along Capitol Mall until 3rd Street, where it transitions to N Street and joins existing rail lines along 7th Street, 8th Street, and H Street. Along the project frontage, the streetcar will serve the existing light rail stations at 7th & Capitol and 8th & Capitol. As part of the streetcar project, new rail track would be constructed in the project vicinity, including eastbound track on the south side of N Street west of 8th Street and westbound track on the north side of N Street west of 7th Street. The new track would require modifications to the northwest corner of the 8th Street and N Street intersection in order to accommodate the necessary track curve radius, which could affect the building envelope of the adjacent project site.

As discussed in the Environmental Setting section, streetcar construction is scheduled to begin in 2027 and be completed by 2030. Project building abatement and demolition is scheduled to begin in Fall 2027 and continue for 18 months. The effects of the demolition phase of the project on transit service and facilities, including the proposed streetcar project, are addressed below in the discussion of Impact 4.4-5. During building abatement and demolition, it is anticipated that Sacramento State would prepare a more detailed land use plan and accompanying CEQA document. It is further assumed for this analysis that construction of future facilities could begin in 2030 and last for

10 years. Therefore, streetcar construction would likely coincide with building abatement and demolition, and while future development planning is occurring. Streetcar construction would likely be complete once construction begins on the initial phase of future development.

It is possible that the project could construct on-site parking facilities and vehicle access locations adjacent to existing and planned rail track, which could introduce the potential for conflicts between entering/exiting vehicles and transit operations. Key design considerations such as building footprints, and vehicular ingress and egress points are unknown. As such, the extent that project build-out would interfere with the planned Downtown Riverfront Streetcar Project (if at all) cannot be confirmed at this time.

The potential for downstream transit ridership changes resulting in adverse effects to the environment, temporary disruptions to transit service due to events, and project disruptions to the planned Downtown Riverfront Streetcar Project indicate that this would be considered a **potentially significant** impact.

Mitigation Measures

Mitigation Measure 4.4-1a: Develop and Implement an Event Transportation Management Plan

Prior to the first event at the project site, the entity conducting redevelopment (e.g., Sacramento State) shall consult with City of Sacramento Public Works staff, SacRT, and other relevant agencies to create an event transportation management plan (ETMP). The purpose of the ETMP is to outline strategies to provide safe, convenient, and efficient access for all modes of travel to and from the proposed project site before, during, and after events. It seeks to minimize conflicts between vehicles, pedestrians, bicycles, and transit providers, while providing access to the project site via each of these travel modes. The ETMP shall outline roles and responsibilities for implementing the ETMP; summarize the travel characteristics of proposed events; and consider existing and projected transit services, station access, pedestrian flows, bicycle parking and access, parking demand and supply, and parking management strategies. The ETMP shall consider the potential for overlapping events with other nearby event venues including, but not limited to, outdoor events on Capitol Mall and at Capitol Park and events at the Golden 1 Center.

The ETMP shall be developed and implemented in consideration of the following goals:

- Vehicle Queuing on City Streets: Through added intersection capacity and/or traffic management, traffic does not queue back to upstream intersections during the pre- or post-event peak hours.
- Pedestrian Flows: Through pedestrian flow management, pedestrians do not spill out of sidewalks onto streets with moving vehicles, particularly along Capitol Mall between 7th Street and 9th Street and along 7th, 8th, and 9th Streets between Capitol Mall and N Street.
- Vehicular Parking: A comprehensive parking plan is implemented that may include such measures as a reservation system, smartphone parking app, directional signage, real-time parking garage occupancy, etc. that minimize unnecessary vehicular circulation (while looking for parking) within and adjacent to the project site.
- Bicycle Facilities: Through traffic management, bicycle facilities are not impeded by event-related traffic or temporary traffic control devices (e.g., signs, barricades, etc.). Signage is clearly visible to direct bicyclists to event bicycle parking, which has an adequate supply to accommodate a typical large event.
- Rail Transit: Through traffic management, light rail and streetcar lines and stations are not impeded by event-related traffic or temporary traffic control devices.
- Bus/Paratransit: Specific locations are provided to accommodate public buses and paratransit vehicle stops within one block of the project site.
- Ridesharing: Specific locations are provided for passenger pick-up/drop-off areas such that taxi, Uber, Lyft, or similar ridesharing services do not impede overall vehicular or pedestrian flow.
- Truck Staging: Delivery trucks associated with special events do not park or idle along Capitol Mall, 7th Street, 8th Street, 9th Street, or N Street.

Mitigation Measure 4.4-1b: Implement Transportation Demand Management Strategies to Minimize Delays to Transit Service

Prior to occupancy of new facilities on each block of the project site, the entity conducting redevelopment (e.g., Sacramento State) shall conduct an analysis to determine the amount of additional transit delay that would be incurred by the development on that block (also considering any existing project development that may already be present) and consider strategies to offset project-related increases to transit delay. Strategies may include the following TDM measures aimed at reducing vehicle travel to and from the project site and associated travel delay:

- Promote walking and bicycling for student, employee, and visitor trips to and from the project site;
- Expand public transit service, including additional service connecting the project site with student and employee residential areas;
- Implement a fair value commuting program or other pricing of vehicle travel and parking;
- Provide carpool and/or vanpool incentive programs;
- Allow flexible work hours and schedule classes to reduce arrivals/departures during peak hours; and
- Offer remote working options.

To the extent necessary to mitigate significant impacts to transit service, strategies may also include implementing transit priority treatments to improve service reliability (i.e., transit-only lanes, transit signal priority at traffic signals, etc.). Any improvements should be selected based on existing performance data and targeted to address those areas not meeting established service standards. The entity conducting redevelopment (e.g., Sacramento State)shall consult with the City of Sacramento, SacRT, and other relevant transit operators to determine the appropriate changes to transit service and facilities. To the extent necessary to mitigate significant impacts to transit service, transit facility and roadway improvements, if any, shall be designed and constructed in accordance with industry best practices and applicable standards.

Mitigation Measure 4.4-1c: Plan Project Development to Minimize Conflicts with Pedestrian, Bicycle, and Transit Facilities

During the planning for future development (e.g., site plan, master plan), the entity conducting redevelopment (e.g., Sacramento State) shall consult with City of Sacramento Public Works staff and SacRT regarding potential design conflicts with nearby pedestrian, bicycle, and transit facilities. Potential design conflicts may include, but are not limited to, conflicts between the project site building envelope and the new streetcar tracks at the northwest corner of the 8th Street and N Street intersection; conflicts between project vehicle access points and the streetcar alignment on N Street, 7th Street, and 8th Street; and conflicts between project vehicle access points and bicycle and pedestrian facilities. If conflicts are identified, the entity conducting redevelopment (e.g., Sacramento State) shall work with the other parties to devise strategies to minimize these conflicts to an acceptable level. In particular, the project site plan should avoid placing vehicle access points (e.g., driveways, loading areas, passenger loading zones, etc.) immediately adjacent to existing and planned rail track and bicycle facilities on N Street, 7th Street, and 8th Street. If these conflicts cannot be sufficiently minimized, appropriate striping, signage, and warning systems should be installed to reduce the risk for collisions and degraded performance at these conflict points to the greatest extent feasible.

Impacts from additional pedestrian traffic may also be mitigated through high visibility crossing markings or other "complete street"-type pedestrian improvements. The intersections of Capitol Mall & 7th Street, Capitol Mall & 8th Street, Capitol Mall & 9th Street, N Street & 7th Street, N Street & 8th Street, and N Street & 9th Street, may require additional pedestrian improvements.

Final designs for all measures may require consultation with the City of Sacramento Traffic Engineer, and City approval where there is an encroachment onto City facilities and will be sufficient to meet applicable design safety standards for vehicle, pedestrian, bicycle, and transit facilities.

Significance after Mitigation

Implementation of Mitigation Measures 4.4-1a, 4.4-1b, and 4.4-1c would reduce adverse effects associated with this impact.

For Mitigation Measure 4.4-1a, the ETMP would identify and implement traffic management techniques to address special event conditions. However, because the ETMP has not yet been drafted or finalized, it cannot yet be determined that it would fully address temporary physical disruptions to the transportation system surrounding the project site. In addition, completing the ETMP would involve collaboration with other parties such as Caltrans and SacRT, adding further uncertainty to the final outcome. Because of uncertainties with regard to impacts to traffic operations and queuing, transit lane closures, and other transportation topics, implementation of Mitigation Measure 4.4-1a would not reduce this impact to a less-than-significant level.

For Mitigation Measure 4.4-1b, the improvements necessary to improve transit performance would require further planning and implementation by the entity conducting redevelopment (e.g., Sacramento State) and coordination with SacRT and the City of Sacramento. Similar to Mitigation Measure 4.4-1a, the effectiveness of the TDM strategies cannot be confirmed at this time and subsequent vehicle trip reduction effects and reductions to delays to transit cannot be guaranteed. Therefore, implementation of Mitigation Measure 4.4-1b would not reduce this impact to a less-than-significant level.

For Mitigation Measures 4.4-1c, further planning and implementation by the entity conducting redevelopment (e.g., Sacramento State) and coordination with SacRT and the City of Sacramento are necessary to determine the appropriate modifications that would fully address potential conflicts between the project and the surrounding transportation system. Therefore, the efficacy of these mitigation measures is uncertain and implementation of Mitigation Measure 4.4-1c would not reduce this impact to a less-than-significant level.

Due to the lack of detail regarding future project information and a specific development site plan (e.g., locations of vehicle entry and exit points), a detailed identification of project-level impacts is unable to be conducted. The exact nature of a significant impact, the physical and operational modifications necessary to address a significant impact, and whether the entity conducting redevelopment (e.g., Sacramento State) and other involved entities (including SacRT and the City) would be able to mutually agree upon the physical and operational modifications necessary to fully mitigate the impact have not been determined. Due to these uncertainties, this impact would remain **significant and unavoidable**.

Impact 4.4-2: Conflict or be Inconsistent with CEQA Guidelines Section 15064.3(b)

Implementation of the project would result in additional vehicle travel. However, the project is within a low VMT-generating area of the Sacramento region with access to high quality transit and multiple travel options. The project would further add to the area's existing mix of land uses and increase complementary land uses, which would increase internal trip capture and reduce VMT generation. This impact would be **less than significant**.

Demolition

While demolition-related vehicles would travel between the project site, equipment sites, and recycling and waste disposal facilities, this travel would not constitute a substantial amount of VMT relative to the overall project build-out. See more details in the discussion of Impact 4.4-5.

Future Development

The project site is located in the Sacramento Central City, which is the most densely and diversely developed area in the region. This location is considered a low-VMT area of the Sacramento region as demonstrated in the analyses conducted by SACOG for the 2025 MTP/SCS. The 2025 MTP/SCS acknowledges that "Location within the region is very likely the most important variable in determining how much time people spend in their vehicles. Communities within existing urban areas, and with a mix and density of uses, tend to produce less VMT per resident than places that are farther away and spread out." Furthermore, the project site has access to multiple travel mode options, including bicycle facilities, light rail service, and local and regional bus service.

The development scenario evaluated in this EIR consists of a mix of residential, commercial, education, employment, and special event uses. The "VMT Impact Assessment" section above discusses recommended thresholds and evaluation methods in the Technical Advisory for each land use type. Because the education and employment uses are most similar to office uses in that they are places of employment, this analysis relies on the recommendations for office projects for the education and employment uses collectively.

Proximity to Major Transit Stop

Per CEQA Guidelines section 15064.3(b)(1), "generally projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact." The entire project site is within 0.5 mile of a major transit stop (i.e., multiple SacRT light rail transit stations). See the "VMT Impact Assessment" section for more information.

Employment Uses—Commercial, Education, and Office in Low-VMT Area

See the "VMT Impact Assessment" section for information on the Technical Advisory criteria for the presumption of a less-than-significant VMT impact in low-VMT areas. As discussed in that section, the project site is in an area that currently generates work VMT per employee that is 16 percent below the regional average. The Technical Advisory suggests office projects exceeding a level of 15 percent below existing regional work VMT per employee may indicate a significant impact. Because the project is in an area that generates work VMT per employee below this 15 percent threshold, it is considered a low-VMT area.

The project introduces additional complementary land uses to the Sacramento Central City, specifically residential units that could be marketed to students and campus employees and commercial retail and restaurant space. This increase in land use diversity would increase internal trip capture and reduce VMT per employee compared to the existing downtown. While the project introduces new complementary land uses, the overall mix of the uses and character of the campus will be similar in features (i.e., density, mix of uses, and transit accessibility) to the surrounding area.

Per the Technical Advisory, office projects "that locate in areas with low VMT and incorporate similar features (i.e., density, mix of uses, transit accessibility) will tend to exhibit similarly low VMT." The Technical Advisory further states that "because new development in such locations would likely result in a similar level of VMT," this information can be used to "screen out residential and office projects from needing to prepare a detailed VMT analysis."

Based on this guidance from the Technical Advisory, the employment uses planned for the project are expected to have a less-than-significant VMT impact because the project is in a low-VMT area.

Residential Uses in Low-VMT Area

The project site is in an area that currently generates household VMT per capita that is 28 percent below the regional average. The Technical Advisory suggests residential projects exceeding a level of 15 percent below existing region or city VMT per capita may indicate a significant impact. Because the project site is in an area that generates total household VMT per capita below this 15 percent threshold, it is considered a low-VMT area.

As noted in the employment uses discussion, the project introduces residential units that would add diversity and balance to the land use mix, increasing the internal trip capture and reducing VMT per capita compared to existing uses. While the project introduces residential uses, the overall mix of the uses and character of the project site will be similar in features (i.e., density, mix of uses, transit accessibility) to the existing surrounding area.

Per the Technical Advisory, residential projects "that locate in areas with low VMT and incorporate similar features (i.e., density, mix of uses, transit accessibility) will tend to exhibit similarly low VMT." The Technical Advisory further states that "because new development in such locations would likely result in a similar level of VMT" this information "can be used to screen out residential and office projects from needing to prepare a detailed VMT analysis."

Based on this guidance from the Technical Advisory, the residential uses planned in the project are expected to have a less-than-significant VMT impact because the project is in a low-VMT area.

Local-Serving Commercial Retail Uses

The Technical Advisory states that "new retail development typically redistributes shopping trips rather than creating new trips," and that "local-serving retail development tends to shorten trips and reduce VMT" by "adding retail opportunities into the urban fabric and thereby improving retail destination proximity." See the "VMT Impact Assessment" section for information.

The project development scenario assumes 147,000 GSF of ground-floor commercial retail. It is anticipated that this commercial retail will in large part serve the project population and the immediate surrounding neighborhoods. Therefore, it is reasonable to conclude that the commercial retail and restaurant components of the project would primarily be local-serving in nature. Per the Technical Advisory, the local-serving commercial retail and restaurant space planned in the project would have a less-than-significant VMT impact.

Conclusion

The project is proximal to a major transit stop, the employment and residential uses planned in the project are expected to maintain the low VMT characteristics of the area, and the project's commercial retail will be local-serving. Based on guidance from the Technical Advisory, the project would have a **less-than-significant** VMT impact.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.4-3: Substantially Increase Hazards Due to a Geometric Design Feature or Incompatible Uses

The project does not propose any new roadways or transportation facilities that would be inconsistent with applicable design standards. This impact would be **less than significant**.

Demolition

The effects of the demolition phase of the project on transportation hazards are addressed below in the discussion of Impact 4.4-5.

Future Development

Construction

The effects of construction of future development on transportation hazards would be very similar to those from demolition of the existing buildings on the project site. Therefore, the effects of future facility construction on transportation hazards are also addressed below in the discussion of Impact 4.4-5.

Operation

The project does not propose any new roadways or transportation facilities that would be inconsistent with applicable design standards. The proposed project would result in increased travel activity, including bicycle, pedestrian, transit, and vehicle trips, as discussed in Impacts 4.4-1 and 4.4-2. These trips would be served by existing and planned facilities that are constructed to applicable design standards to serve these travel modes. The project would generate trips consistent with the surrounding functional classification of roadways.

Consequently, the project would not result in a change to the volume, mix, or speed of traffic that is not compatible with the design of existing roadways and transportation facilities. Therefore, this impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.4-4: Result in Inadequate Emergency Access

The roadway and transportation network surrounding the project is designed to maintain high levels of accessibility and includes multiple emergency vehicle access facilities that can be used when necessary. This ensures emergency response vehicles have the necessary access when responding to an emergency. This impact would be **less than significant**.

Demolition

The effects of the demolition phase of the project on emergency access are addressed below in the discussion of Impact 4.4-5.

Future Development

Construction

The effects of construction of future development on emergency access would be very similar to those from demolition of the existing buildings on the project site. Therefore, the effects of future facility construction on transportation hazards are also addressed below in the discussion of Impact 4.4-5.

Operation

The proposed roadway and transportation network under the City of Sacramento 2040 General Plan and Central City Specific Plan would be designed to maintain high levels of accessibility and personal mobility. Central Sacramento has, and will retain a grid network of streets to provide redundant connectivity. Many buildings have adjacent on-street and off-street parking areas that could be used by emergency responders. While details on project building footprints and design are not known at this time, consistent with city and state standards, if access points are on a dedicated pedestrian facility rather than a vehicular roadway or parking area, pedestrian promenades will be wide enough to accommodate emergency vehicles and have removable bollards at roadway junctures should emergency access be necessary.

The project site has multiple access points on 7th Street, 8th Street, 9th Street, and N Street, to allow emergency vehicles to use convenient and direct routes. Therefore, this impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.4-5: Result in Demolition/Construction Activity that Could Cause Temporary Impacts to Transportation and Traffic

Demolition- and construction-related traffic impacts would be localized and temporary. Project demolition and construction activity would necessitate restriction or redirection of pedestrian, bicycle, and vehicular movements to accommodate construction staging, material hauling, material staging, and modifications to utility connections. DGS and the entity implementing future re-development (e.g., Sacramento State) would prepare and implement a construction traffic management plan to reduce the temporary impacts to the degree feasible. However, the project would cause temporary physical disruptions to light rail and bus transit service and operations that would not be remedied by the construction traffic management plan and mitigation actions. Therefore, construction-related impacts on transportation and traffic would be **significant**.

Project demolition activities would begin in Fall 2027 and continue for approximately 18 months. The timing of construction for redevelopment is likely to start some time in 2030 and is estimated to last for approximately 10 years. The project would generate truck and worker trips during hazardous materials abatement, utility upgrade, demolition, excavation, site preparation, and construction phases of the process. It is estimated that there could be approximately 6,102 total haul truck trips (3,051 inbound and 3,051 outbound truck trips) for all phases of demolition. The abatement and demolition labor force would fluctuate depending on the phase of work but it is expected that during peak activity periods when abatement of one building is occurring concurrently with demolition of another building the

workforce to range between 40 and 55 workers during peak periods. Details regarding timing, truck trips, and worker levels for the construction phase of the redevelopment of the site are not known at this time.

The project would require three separate closures of 8th Street to all persons and vehicles, including light rail, to support the abatement and demolition of the EDD Headquarters Building sky bridge that crosses over 8th Street. The first closure would be for 48-72 hours to set up a scaffolding system under the sky bridge, and across 8th Street, to support the abatement and demolition process. Work would be continuous during this period, including at night. The scaffolding would be installed during a weekend when there are no events being held on Capitol Mall to implement the work during low traffic and low transit demand periods. Once the scaffolding is installed, 8th Street would be able to operate normally while the scaffolding is in place. Once the scaffolding is in place, abatement of the sky bridge would commence and use of 8th Street would be unaffected. After abatement, the sky bridge would be demolished over a 3- to 5-day period (including a weekend) when no events were being held on Capitol Mall. Because closure of 8th Street between Capitol Mall and N Street would be required, demolition would be conducted continuously, day and night to complete the process as soon as possible. Once demolition is complete, 8th Street would be re-opened, but the scaffolding would remain in place. Removal of the scaffolding would require closure of 8th Street for 24-48 hours, during which time work would be continuous, and would occur over a weekend with no events being held on Capitol Mall. Once the scaffolding was removed, 8th Street would be reopened.

Due to demolition activities affecting City streets, DGS would prepare and implement a construction traffic control plan (CTMP), consistent with Section 12.20.20 of the Sacramento City Code. The CTMP would be subject to approval by the City of Sacramento Traffic Engineer and subject to review by all affected agencies, including California Highway Patrol and City of Sacramento Fire and Police Departments. The CTMP would be designed to ensure acceptable operating conditions on local roadways, pedestrian and bicycle facilities, and transit studied as a part of this EIR and affected by construction traffic. The CTMP would illustrate the location of the proposed work areas; identify the location of areas where the public right-of-way would be closed or obstructed, and the placement of traffic control devices necessary to perform the work; show the proposed phases of traffic control; and identify the time periods when the traffic control would be in effect and the time periods when work would prohibit access to private property from a public right-of-way. The plan may be modified by the City at any time to eliminate or avoid traffic conditions that are hazardous to the safety of the public. The CTMP would also provide information on access for emergency vehicles to prevent interference with emergency response.

During abatement, demolition, and construction of future development, there would be periods during which pedestrian, bicycle, bus, and vehicular movements around the site would be restricted or redirected to accommodate project activities and maintain public safety. Such restrictions could include sidewalk and crosswalk closures, lane closures, lane narrowing, on-street parking removal, and detours, which would be localized and temporary. Restrictions could also include temporary closures of bicycle facilities near the project site, including the Class II bike lanes on Capitol Mall and the Class IV separated bikeways on 9th Street. However, it is assumed that abatement, demolition, and future construction would avoid disturbance of light rail line operation, other than the closures of 8th Street required for demolition of the EDD Headquarters Building sky bridge. Vehicular, pedestrian, and bicycle access to apartments, offices, and other buildings in the area would be maintained even if streets and sidewalks are temporarily blocked off. The project site is located within the downtown street grid, and there are various alternative routes available to access the project site and nearby locations if any streets or sidewalks in the immediate project vicinity are closed.

The following three bus stops located along the immediate project site frontages could be affected by demolition and construction activities such as temporary fencing, temporary traffic controls, and haul truck ingress/egress:

- east side of 8th Street between L Street and Capitol Mall,
- east side of 8th Street between Capitol Mall and N Street, and
- west side of 9th Street between Capitol Mall and N Street.

Demolition- and construction-related disruptions to these bus stops could cause temporary bus stop closures such that transit passengers would not be able to ingress/egress existing bus routes serving these stops. These disruptions could last for the duration of demolition and construction activities on the blocks where these bus stops are located.

The temporary closures of 8th Street would affect SacRT light rail service on the Blue, Gold, and Green Lines. During the 8th Street closure periods, all three light rail lines would be unable to utilize the northbound track on 8th Street. There are no alternative track alignments available to bypass the affected track segment. Moreover, there are no nearby track crossover options available to easily operate light rail on modified alignments (e.g., temporarily splitting the Blue Line into two lines and providing a "bus bridge" to serve through passengers on the affected track segment). This would result in major service disruptions to SacRT light rail service operations and passengers during the temporary closures of 8th Street (six to 10 days in total). Buses would also not be able to use 8th Street during closure periods, but could adjust their routes to other streets.

Additionally, it is possible that project-related demolition activities could physically interfere with the planned construction of the Downtown Riverfront Streetcar Project. The streetcar project would include the installation of new rail track on N Street between 7th Street and 8th Street, and utilize the existing rail track and platforms on 7th and 8th Streets within the project site vicinity. Streetcar construction is anticipated to occur between early 2027 and 2030, while demolition of the project site is set for Fall 2027 through 2028, for approximately 18 months. Construction of future development would occur after Streetcar construction is completed.

Demolition- and construction-related traffic impacts would be localized and temporary, and DGS (for demolition) and the entity conducting redevelopment (e.g., Sacramento State) would prepare and implement a CTMP in consultation with the City Traffic Engineer. However, project demolition and construction activities would cause temporary physical disruptions to existing light rail and bus transit operations and passenger access that would not otherwise be remedied by the CTMP. Moreover, project demolition activities have the potential to physically interfere with the construction of the Downtown Riverfront Streetcar Project. Therefore, this impact is **significant**.

Mitigation Measures

Mitigation Measure 4.4-5a: Coordinate with Transit Operators to Implement Temporary Light Rail and Bus Service Modifications During Project Demolition and Construction Activities

During development of the CTMP, DGS and, to the extent necessary to mitigate significant impacts, the entity conducting redevelopment (e.g., Sacramento State) shall coordinate with relevant transit operators to determine necessary temporary light rail and bus service modifications during project demolition and construction activities. Relevant transit operators include SacRT, Roseville Transit, El Dorado Transit, and other bus service operators that serve the existing bus stops located on the immediate project site frontages. The temporary service modifications shall ensure that alternative transit service options are available to transit passengers who utilize light rail and bus services that would be disrupted by the project, to the satisfaction of the affected transit operators. Moreover, the temporary service modifications shall ensure that light rail operations can be maintained for passengers outside of the downtown Sacramento area. Potential alternative transit service options include temporary light rail service disruption bus bridges, bus route detours, and rail station/bus stop relocations. DGS and the entity conducting redevelopment (e.g., Sacramento State) shall coordinate with relevant transit operators to ensure that the public is notified of alternative transit service options through appropriate communication channels such as websites, media, social media, and signage. To the extent necessary to mitigate significant impacts to transit service, DGS and the entity conducting redevelopment (e.g., Sacramento State) shall pay the affected transit operators for administrative, service, operations, maintenance, and other direct expenses associated with implementation of the temporary light rail and bus service modifications. DGS and the entity conducting redevelopment (e.g., Sacramento State) shall coordinate with the relevant transit operators to ensure that the temporary light rail and bus service modifications are implemented prior to the commencement of project demolition activities, and that the service modifications continue until the completion of project construction activities.

Mitigation Measure 4.4-5b: Coordinate with City of Sacramento and SacRT to Minimize Conflicts Between Project Demolition and Downtown Riverfront Streetcar Project Construction Activities

During development of their respective CTMPs, DGS and the entity conducting redevelopment (e.g., Sacramento State) shall consult with the City of Sacramento and SacRT to identify and address potential conflicts between the demolition of the project site and the construction of the Downtown Riverfront Streetcar Project. Potential conflicts include deployment of temporary traffic control equipment that physically impedes the construction zone for the streetcar project. The project CTMP should include plans to accommodate streetcar project construction activities.

Significance after Mitigation

Implementation of Mitigation Measure 4.4-5a would reduce the significance of this impact by providing alternative transit service options to light rail and bus service that would be disrupted by project demolition and construction activities. However, the alternative transit service options would be subject to coordination with others such as SacRT and the City of Sacramento and it cannot be guaranteed at this time that they would be implemented. Therefore, it cannot be assured that Mitigation Measure 4.4-5a would reduce this impact to a less-than-significant level.

Implementation of Mitigation Measure 4.4-5b would reduce the significance of this impact by reducing potential conflicts between the project demolition and Downtown Riverfront Streetcar Project construction activities. However, this mitigation measure is subject to coordination with others such as the City of Sacramento and SacRT. Because of uncertainty regarding the outcome of this coordination with other entities, it cannot be assured that Mitigation Measure 4.4-5b would reduce this impact to a less-than-significant level.

Because DGS, or a future entity implementing site redevelopment (e.g., Sacramento State), cannot guarantee that these modifications would be implemented due to the participation of other agencies, this impact would be **significant and unavoidable**.

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4.5 UTILITIES AND SERVICE SYSTEMS

This section evaluates the availability of existing utility and infrastructure systems (water, wastewater, stormwater, electricity, and natural gas) to serve the Capitol Mall Office Buildings Demolition Project and the impact of the project on these systems. The analysis is based on documents obtained from the City of Sacramento (City) and the Sacramento Area Sewer District (SacSewer), and personal communications with representatives of the City, SacSewer, Sacramento Municipal Utility District (SMUD), and Pacific Gas and Electric Company (PG&E).

Three comment letters regarding utilities and service systems were received in response to the Notice of Preparation (see Appendix A). The Sacramento Metropolitan Air Quality Management District raised concerns regarding the landfilling, recycling, or reuse of demolition materials; SMUD identified issues related to existing electrical infrastructure, including transmission and distribution lines, utility easements, utility routing, transformer vaults, underground facilities, and SMUD infrastructure; and the City of Sacramento Department of Utilities commented on abandonment of existing water services associated with demolition and provision of water, sewer, and drainage infrastructure for future development. These issues are addressed in this section.

4.5.1 Regulatory Setting

DOMESTIC WATER

Federal

Safe Drinking Water Act

As mandated by the Safe Drinking Water Act (Public Law 93-523), passed in 1974, the US Environmental Protection Agency (EPA) regulates contaminants of concern to domestic water supply. Such contaminants are defined as those that pose a public health threat or that alter the aesthetic acceptability of the water. These types of contaminants are regulated by EPA primary and secondary maximum contaminant levels (MCLs). MCLs and the process for setting these standards are reviewed every 3 years. Amendments to the Safe Drinking Water Act enacted in 1986 established an accelerated schedule for setting drinking water MCLs. EPA has delegated responsibility for California's drinking water program to the State Water Resources Control Board Division of Drinking Water (SWRCB-DDW). SWRCB-DDW is accountable to EPA for program implementation and for adoption of standards and regulations that are at least as stringent as those developed by EPA.

State

Urban Water Management Plan

In 1983, the California Legislature enacted the Urban Water Management Planning Act (UWMPA) (California Water Code Sections 10610–10656). The UWMPA states that every urban water supplier that provides water to 3,000 or more customers, or that provides more than 3,000 acre-feet (af) of water annually, should make every effort to ensure the appropriate level of reliability in its water service sufficient to meet the needs of its various categories of customers during normal, dry, and multiple dry years. This effort includes the adoption of an urban water management plan (UWMP) by every urban-water suplier and an update of the plan every 5 years on or before December 31, of every year ending in a five or zero. The UWMPA and SB 610, described below, are interrelated; the UWMP is typically relied upon to meet the requirements for SB 610.

The City of Sacramento 2025 UWMP, adopted in June 2026, is based on the Sacramento 2040 General Plan.

California Safe Drinking Water Act

The SWRCB-DDW is responsible for implementing the federal SDWA and its updates, as well as California statutes and regulations related to drinking water. State primary and secondary drinking-water standards are promulgated in California Code of Regulations (CCR) Title 22, Sections 64431–64501.

The California Safe Drinking Water Act (CA SDWA) was passed in 1976 to build on and strengthen the federal SDWA. The CA SDWA authorizes DHS to protect the public from contaminants in drinking water by establishing MCLs that are at least as stringent as those developed by EPA, as required by the federal SDWA.

Local

The buildings on the project site are located on State-owned property and would be demolished by the Department of General Services (DGS) and subsequent development is presumed to be undertaken by the California State University, Sacramento (Sacramento State), another State agency. As explained in Section 4.2, "Land Use and Planning," of this Draft EIR, under Section 4.2.1, "Local," state agencies are not subject to local plans, policies, and zoning regulations. Nevertheless, in the exercise of its discretion, DGS does reference, describe, and address local plans, policies, and regulations in its evaluation of the project. This evaluation is also intended to be used by local agencies for determining, as part of their permit processes, the project's consistency with local plans, policies, and regulations. This applies to local plans, policies, and regulations related to all utilities addressed in this section; domestic water, wastewater and stormwater, solid waste, and energy.

Water Service System and Fees

Chapter 13.04 of the City Code regulates construction of water distribution facilities; describes requirements for installation of water meters; establishes the review process for ensuring adequate fire flow and hydrants; and states that rates, fees, and charges for sewer service and storm drain service are established and will be updated from time to time by ordinance or resolution of the City Council.

City of Sacramento 2040 General Plan

The following policies from the Sacramento 2040 General Plan Public Facilities and Safety Element relate to water supply and infrastructure and may be applicable to the project:

- **Policy PFS-4:** A reliable supply of high-quality water that meets projected needs within the city's place of use.
- **Policy PFS-4.3:** Surface Water Supply. The City shall continue to explore and advance options for diverting, treating, and conveying surface water to be able to continue fully meeting potable supply demand.
- **Policy PFS-4.4:** Groundwater Infrastructure. The City shall maintain investment in groundwater infrastructure to provide for water supply reliability. Groundwater sustainability, cost effectiveness, and the quality of the resource shall be factored into groundwater investments.
- **Policy PFS-4.6:** Recycled Water. The City shall continue to monitor the feasibility of utilizing recycled water where appropriate, cost effective, safe, and environmentally sustainable.
- **Policy PFS-4.7:** Water Supply During Emergencies. The City shall, to the extent feasible, maintain adequate water supply during emergencies in accordance with the Water Master Plan and the Urban Water Management Plan.
- **Policy PFS-4.8:** New Development. The City shall ensure that water supply capacity is in place prior to granting building permits for new development.

City of Sacramento 2025 Urban Water Management Plan

The City of Sacramento 2025 UWMP, adopted in June 2026, is based on the Sacramento 2040 General Plan. The 2025 UWMP describes the City water system, water supply sources, historical and projected water use, and a comparison of projected water supply to water demands during normal, single-dry, and multiple-dry years in 5-year increments from 2025 to 2050. The 2025 UWMP confirms that overall, as presented in the UWMP's reliability findings, the City of Sacramento has a diverse water supply portfolio that meets water demands in its service area in normal, single dry, and five consecutive dry years from 2025 through 2050, assuming active management of its supply portfolio.

WASTEWATER AND STORMWATER

Federal

Clean Water Act

The Clean Water Act (CWA) employs a variety of regulatory and non-regulatory tools to reduce direct pollutant discharges into waterways, finance municipal wastewater treatment facilities, and manage polluted runoff. Those portions of the CWA that relate to wastewater and stormwater discharges are discussed below.

National Pollutant Discharge Elimination System

The National Pollutant Discharge Elimination System (NPDES) permit program was established under the CWA to regulate municipal and industrial discharges to surface waters of the US. NPDES permit regulations have been established for broad categories of discharges including point source waste discharges and nonpoint sources (nonpoint source discharges are further discussed in Section 4.11, "Hydrology and Water Quality"). Each NPDES permit identifies limits on allowable concentrations and mass loadings of pollutants contained in the discharge. Sections 401 and 402 of the CWA contain general requirements regarding NPDES permits. Section 307 of the CWA describes the factors that EPA must consider in setting effluent limits for priority pollutants.

NPDES permits cover various industrial and municipal discharges, including discharges from storm sewer systems in larger cities, stormwater generated by industrial activity, runoff from construction sites disturbing more than 1 acre, and mining operations. Point source dischargers must obtain a discharge permit from the proper authority (usually a state, sometimes EPA, a tribe, or a territory). So-called "indirect" point source dischargers are not required to obtain NPDES permits. "Indirect" dischargers send their wastewater into a public sewer system, which carries it to the municipal sewage treatment plant, through which it passes before entering any surface water.

The CWA was amended in 1987 with Section 402(p) requiring NPDES permits for nonpoint source (i.e., stormwater) pollutants in discharges. Stormwater sources are diffuse and originate over a wide area rather than from a definable point. The goal of the NPDES stormwater regulations is to improve the water quality of stormwater discharged to receiving waters to the "maximum extent practicable" using structural and nonstructural best management practices (BMPs). BMPs can include educational measures (e.g., workshops informing the public of what impacts can result when household chemicals are dumped into storm drains), regulatory measures (e.g., local authority of drainage-facility design), public-policy measures (e.g., labeling storm-drain inlets as to impacts of dumping on receiving waters) and structural measures (e.g., filter strips, grass swales, and detention ponds).

State

NPDES Permit for the Sacramento Regional Water Treatment Plant

In April 2021, the Central Valley RWQCB issued WDR Order No. R5-2021-0019-02 (NPDES No. CA 0077682) to the Sacramento Regional County Sanitation District (now SacSewer) for its Sacramento Regional Wastewater Treatment Plant (SRWTP) (now the EchoWater Resource Recovery Facility or EchoWater Facility), which treats wastewater from its service area before discharging it to the Sacramento River. The original permit for the SRWTP was issued in October 1974. This is an NPDES self-monitoring permit that outlines performance standards for the effluent into the Sacramento River. The water quality objectives established in the Central Valley RWQCB Basin Plan are protected, in part, by NPDES Permit No. CA 0077682.

The quality of the effluent that can be discharged to waterways within the Sacramento area is established by the Central Valley RWQCB through waste discharge requirements (WDRs) that implement the NPDES permit. WDRs are updated at least every 5 years. A new permit must be issued in the event of a major change or expansion of the facility.

NPDES Permit for the Combined Sewer System

In August 2020, the Central Valley RWQCB adopted WDR Order No. R5-2020-0039 (NPDES No. CA 0079111) to the City of Sacramento for its Combined Wastewater Collection and Treatment System (Central Valley RWQCB 2015). Depending on flow volumes, wastewater and stormwater flows in this system are conveyed to the EchoWater Facility,

Combined Wastewater Treatment Plant (CWTP) at South Land Park Drive and 35th Avenue, and Pioneer Reservoir at Front and V streets near the Sacramento River. The Order does not apply to operations at the EchoWater Facility.

This Order implements the EPA Combined Sewer Overflow (CSO) Control Policy, which establishes a consistent national approach for controlling discharges from CSOs to the nation's water through the NPDES permit program. This policy requires implementation of a long-term control plan (LTCP) to comply with water quality-based requirements of the CWA. The City of Sacramento adopted their LTCP, also known as the combined sewer system improvement plan (CSSIP), in 1995, which contained the infrastructure improvement portion of the LTCP. The LTCP and CSSIP have been updated on a regular basis since initial adoption.

WDR Order No. R5-2020-0039 identifies effluent limitations and discharge specifications for discharges from the CWTP and Pioneer Reservoir to the Sacramento River. Discharge from the system to surface waters or surface water drainage courses is prohibited during non-storm events. However, in the event that the capacity of the system is exceeded during a storm event, this Order allows for the discharge of overflows into the Sacramento River. The City is required to implement pollution prevention programs to reduce contaminants in CSOs.

Local

City of Sacramento Combined System Development Fee

An ordinance amending Chapter 13.08 of the City of Sacramento Code relating to sewer and storm-drain service systems and establishing Combined Sewer System (CSS) development fee amounts was approved by the City's Law and Legislation Committee on February 15, 2005 and was passed for publication on February 22, 2005. This fee requires new connections to the CSS to pay a development fee to recover an appropriate share of the capital costs of the CSS facilities needed to accommodate new development in the CSS area.

Sacramento Area Sewer District Consolidated Ordinance

The SacSewer Consolidated Ordinance sets forth requirements for use of its wastewater collection and treatment system, provides for the enforcement of these requirements, establishes penalties for violations, and establishes the rates and fees for users of SacSewer's sewer facilities.

Stormwater Quality Design Manual for the Sacramento and South Placer Regions

The Stormwater Quality Design Manual outlines planning tools and requirements to reduce urban runoff pollution to the maximum extent practicable from new development and redevelopment projects. The manual is a collaborative effort between multiple jurisdictions and is intended to satisfy the regulatory requirements of municipal stormwater permits. The plan provides planning and design tools for use by planners, architects, landscape architects, engineers and environmental professionals.

City of Sacramento 2040 General Plan

The following goals and policies from the Sacramento 2040 General Plan Public Facilities and Safety Element relate to stormwater and wastewater management.

- **Policy PFS-3:** Efficient, high-quality utility infrastructure and services to meet the needs of residents and business throughout the city.
- **Policy PFS-3.1:** Provision of Adequate Utilities. The City shall continue to provide reliable water, wastewater, and stormwater drainage utility services.
- **Policy PFS-3.3:** Development Impacts. Through the development review process, including through development impact fees and offsite improvements constructed by new development, the City shall ensure that adequate public utilities and services are available to serve new development.
- **Policy PFS-3.15:** Adequate Drainage Facilities. The City shall ensure that all new municipal drainage facilities are adequately sized and constructed to accommodate stormwater runoff, including incorporating "green infrastructure" design and Low Impact Development (LID) techniques, where appropriate, stormwater treatment features, and, if applicable, trash capture devices for its stormwater facilities.

- **Policy PFS-3.16:** Stormwater Design in Private Development. The City shall require proponents of new development and redevelopment projects to submit drainage studies that adhere to City stormwater design requirements and incorporate measures, including "green infrastructure", Low Impact Development (LID) techniques, stormwater treatment, and, if applicable, trash capture devices, to prevent on- or off-site flooding and improve runoff water quality.

SOLID WASTE

Federal

No federal plans, policies, regulations, or laws are applicable to solid waste services for the project.

State

California Integrated Waste Management Act

To minimize the amount of solid waste that must be disposed of in landfills, the State Legislature passed the California Integrated Waste Management Act of 1989 (AB 939), effective January 1990. According to AB 939, all cities and counties were required to divert 25 percent of their generated waste from landfill facilities by January 1, 1995 and 50 percent by January 1, 2000. Solid waste plans are required to explain how each city's AB 939 plan will be integrated with the county plan. In order of priority, the plans must promote source reduction, recycling and composting, and environmentally safe transformation and land disposal.

In 1999, Governor Davis signed AB 75 (Chapter 764, Statutes of 1999), which mandated that State agencies comply with AB 939 diversion requirements. In addition to the requirements of AB 75, the following policies and statutes address State agency recycling:

- Executive Order W-7-91 requires California State agencies to buy recycled products and set up recycling programs.
- Public Contract Code (PCC) Sections 12164.5–12167.1 require the California Department of Resources Recycling and Recovery (CalRecycle) to develop a recycling plan and implement recycling programs for the Legislature and all State-owned and leased buildings.
- PCC 12167.1 requires State agencies and institutions to report materials collected for recycling to CalRecycle.
- PRC 42560–42562 requires CalRecycle to recycle high-grade white office paper in California State offices.
- California State Administration Manual Chapter 1990 encourages employees at State facilities to prevent waste, reuse, and recycle.

Local

City of Sacramento 2040 General Plan

The goals and policies listed below from the Public Facilities and Safety Element are relevant to effects on solid waste.

- **Policy PFS-5:** Sensible waste management that reduces disposal in landfills and supports cost-effective sustainability efforts.
- **Policy PFS-5.1:** Solid Waste Reduction. The City shall reduce the amount of solid waste that is disposed in landfills by promoting source reduction and recycling throughout Sacramento and by expanding the range of programs and information available to local residents and businesses, consistent with State requirements.
- **Policy PFS-5.2:** Collection and Recycling Services. The City shall provide for continued solid waste collection and recycling services in Sacramento, including contracting with franchise waste haulers, and ensuring adequate transfer station facilities capacity and the availability of adequate landfill capacity to meet future needs.

- **Policy PFS-5.5:** Recycled Materials in New Construction. The City shall encourage the use of recycled materials in new construction. Methods shall include promoting the availability of materials at Certified Construction and Demolition (C&D) Debris Sorting Facilities and the reuse store at the Sacramento Recycling and Transfer Station.

ENERGY

Federal

No federal plans, policies, regulations, or laws are applicable to energy for the project.

State

California Environmental Quality Act

Appendix F of the State CEQA Guidelines sets forth goals for energy conservation, including decreasing per capita energy consumption and reliance on fossil fuels and increasing reliance on renewable energy sources. CEQA requires EIRs to describe potential energy impacts of projects, with an emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy (Public Resources Code [PRC] Section 21100[b][3]).

The California Energy Commission prepares an integrated policy report every 2 years that assesses major energy trends and issues facing the state's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the state's economy; and protect public health and safety (CEC 2026). Energy efficiency is one of the key components of the state's strategy to reduce greenhouse gas emissions (GHGs) and to achieve reduction targets set forth by Assembly Bill (AB) 32, Senate Bill (SB) 32, and Governor Brown's Executive Order B-30-15. Efficiency achieved through building codes, appliance standards, and ratepayer-funded programs has had a positive impact on GHG emissions in recent years. The policy report discusses efforts to decarbonize California's energy system and recognizes transitioning to zero- and near-zero emission vehicles will be a fundamental part of meeting the state's climate goals.

The California Public Utilities Commission 2011 update to the Energy Efficiency Strategic Plan established goals of having all new residential construction in California be zero net energy (ZNE) by 2020 and all new commercial construction ZNE by 2030 (CPUC 2011).

Clean Energy and Pollution Reduction Act

On October 7, 2015, the Clean Energy and Pollution Reduction Act (SB 350) was signed into law, establishing new clean energy, clean air and GHG reduction goals for 2030 and beyond. SB 350 established clean energy, clean air, and GHG reduction goals, including reducing GHG to 40 percent below 1990 levels by 2030 and to 80 percent below 1990 levels by 2050, and is part of California's overall strategy to address climate change (CEC n.d.).

California Code of Regulations, Energy Efficiency Standards

Energy consumption in new buildings in California is regulated by State Building Energy Efficiency Standards (CALGreen) contained in the California Code of Regulations, Title 24, Part 6. Title 24 applies to all new construction of both residential and nonresidential buildings, and regulates energy consumed for heating, cooling, ventilation, water heating, and lighting. The 2025 Building Energy Efficiency Standards builds on California's technology innovations, encouraging energy efficient approaches to encourage building decarbonization, emphasizing use of heat pumps for space heating and water heating (CEC 2025).

Green Building Initiative

In 2012, Governor Brown's Executive Order B-18-12 (State of California Green Buildings 2012) and its related Green Building Action Plan state the following energy and water efficiency improvement goals for facilities owned, funded, and leased by the State:

- All new state buildings beginning design after 2025 shall be constructed as ZNE facilities with an interim target for 50 percent of new facilities beginning design after 2020 to be ZNE. State agencies shall also take measures toward achieving ZNE for 50 percent of the square footage of existing state-owned building area by 2025.
- The state shall identify at least three buildings by January 1, 2013, to pursue ZNE as pilot projects.
- New and major renovated state buildings shall be designed and constructed to exceed the applicable version of CCR Title 24, Part 6, by 15 percent or more, and include building commissioning, for buildings authorized to begin design after July 1, 2012.
- Any proposed new or major renovation of state buildings larger than 10,000 square feet shall use clean, onsite power generation such as solar photovoltaic, solar thermal, and wind power generation, and clean backup power supplies, if economically feasible.
- New and major renovated state buildings larger than 10,000 square feet shall obtain Leadership in Energy and Environmental Design (LEED) "Silver" certification or higher.
- State agencies shall reduce water use at the facilities they operate by 10 percent by 2015 and by 20 percent by 2020, as measured against a 2010 baseline.
- All new and renovated state buildings and landscapes shall utilize alternative sources of water wherever cost-effective. Sources may include, but are not limited to: recycled water, graywater, rainwater capture, stormwater retention, and other water conservation measures.
- Landscape plants shall be selected based on their suitability to local climate and site conditions, and reduced water needs and maintenance requirements.
- State agencies shall identify and pursue opportunities to provide electric vehicle charging stations, and accommodate future charging infrastructure demand, at employee parking facilities in new and existing buildings.

Local

City of Sacramento 2040 General Plan

The goals and policies listed below from the Public Facilities and Safety Element are relevant to effects on energy.

- **Policy PFS-3:** Efficient, high-quality utility infrastructure and services to meet the needs of residents and business throughout the city.
- **Policy PFS-3.1:** Provision of Adequate Utilities. The City shall continue to provide reliable water, wastewater, and stormwater drainage utility services.
- **Policy PFS-3.2:** Utility Sustainability. The City shall continue to improve the sustainability, resilience, and energy efficiency of its facilities, infrastructure, and operations consistent with the Climate Action and Adaptation Plan and the goal of achieving carbon neutrality by 2045.

4.5.2 Environmental Setting

Public utilities in the project area are provided by various entities, as identified in Table 4.5-1 and discussed in detail below.

Table 4.5-1 Utility Providers for the Project Area

Utility	Agency/Provider
Water Supply	City of Sacramento
Wastewater Collection and Conveyance	City of Sacramento
Wastewater Treatment	Sacramento Area Sewer District
Stormwater Conveyance	City of Sacramento
Solid Waste Collection[1]	City of Sacramento (residential); Various private franchised haulers (commercial)
Electrical Service	Sacramento Municipal Utility District
Natural Gas	Pacific Gas & Electric Company

[1] Discussed in Section 4.14, "Public Services."

Source: Data compiled by Ascent in 2026.

WATER SUPPLY

The City of Sacramento Department of Utilities is responsible for water service within the city limits, including the project site, with the exception of some city residents who receive their water from Sacramento Suburban Water District. The City provides drinking water from groundwater and surface water resources. Surface water is diverted at two locations: from the American River downstream of the Howe Avenue Bridge, and from the Sacramento River downstream of the confluence of the American and Sacramento Rivers. The City draws groundwater from two subbasins of the Sacramento Valley Groundwater Basin, the North American Subbasin, located north of the American River, and South American Subbasin, located south of the American River.

The City's retail service area covers approximately 101 square miles (64,425 acres) with 142,946 retail customer connections as of December 2020. The City also provides wholesale water supplies to the Sacramento County Water Agency, Sacramento Suburban Water District, California American Water, and the Natomas Unified School District (City of Sacramento 2021).

Surface Water Supply

As stated above, the City of Sacramento relies on two primary surface water sources: the Sacramento and American River watersheds. The City of Sacramento has relied on river water for its primary source of supply since 1854 and claims pre-1914 rights to divert approximately 75 cubic feet per second (cfs) from the Sacramento River. In addition, the City holds five water rights permits to serve the city: one for diversion of Sacramento River water and four for diversion of American River water. Table 4.5-2 indicates the permit number, the rate of diversion in cfs, annual limit in acre-feet per year (afy), and season of use for each permit (City of Sacramento 2026a).

The Sacramento River permit and two of the American River permits authorize direct diversion of water from its respective source (City of Sacramento 2021). The other two permits authorize rediversion for use of American River tributary water diverted by SMUD's Upper American River Project. Water diverted under these two permits may be rediverted for use at several locations, including the E.A. Fairbairn Water Treatment Plant (EAFWTP) and the SRWTP.

Table 4.5-2 Summary of Surface Water Rights for the City of Sacramento

Permit No.	River Source	Maximum Amount Specified		Purpose of Use	Period of Use
		cfs	afy		
Permit 992	Sacramento	225	81,800	Municipal	Year-round
Permit 11358	American	500	271,740	Municipal	Direct Diversion: Nov 1 to Aug 1
Permit 11359	Tributaries of American	310	443,479	Municipal	Direct Diversion: Nov 1 to Aug 1
					Re-diversion: Year-round
Permit 11360	Tributaries of American	1,200	966,175	Municipal	Direct Diversion: Nov 1 to Aug 1
					Re-diversion: Year-round
Permit 11361	Tributaries of American	175	95,109	Municipal	Direct Diversion: Nov 1 to Aug 1

Notes: afy = acre-feet per year; cfs = cubic feet per second.

Source: City of Sacramento 2026a.

In 1957, the US Bureau of Reclamation (Reclamation) and the City entered into a permanent water rights settlement agreement pertaining to the use of water from the American and Sacramento Rivers. This agreement settled the parties' competing claims to American River water and backed up the City's water rights permits by requiring Reclamation to operate its facilities so that the City would always have sufficient water available to meet its needs. Table 4.5-3 shows the City's schedule of authorized surface water supply over the next approximately 25 years.

Table 4.5-3 Maximum Contracted Annual Surface Water Diversion (afy) for the City of Sacramento[1]

Water Source	2025	2030	2035	2040	2045	2050
Maximum Diversion from the Sacramento River	81,800	81,800	81,800	81,800	81,800	81,800
Maximum Diversion from the American River	228,000	245,000	245,000	245,000	245,000	245,000
Total	**304,800**	**326,800**	**326,800**	**326,800**	**326,800**	**326,800**

Note: afy = acre-feet per year

[1] USBR Operating Contract No. 14-06-200-6497, Diversion Schedule by City of Sacramento, Schedule "A" and Schedule "B" at pp. 54-55.

Source: City of Sacramento 2026a.

The 2025 UWMP assessed future supply and long-term reliability of the City's Sacramento and American River permits, including during multiple dry years. Tables 4.5-4 and 4.5-5 show that the availability of water from the Sacramento and the American River is consistent across normal years, single dry-years, and during a multi-year drought. Available annual supply from the Sacramento River is 81,800 afy and from the American River is 245,000 afy.

Table 4.5-4 Sacramento River Water Availability – 2050 Planning Horizon (Acre-Feet per Year)

Year Type		2030	2035	2040	2045	2050
Normal		81,800	81,800	81,800	81,800	81,800
Single Dry-Year		81,800	81,800	81,800	81,800	81,800
Multi-Year Drought	Year 1	81,800	81,800	81,800	81,800	81,800
	Year 2	81,800	81,800	81,800	81,800	81,800
	Year 3	81,800	81,800	81,800	81,800	81,800
	Year 4	81,800	81,800	81,800	81,800	81,800
	Year 5	81,800	81,800	81,800	81,800	81,800

Source: City of Sacramento 2026a.

Table 4.5-5 American River Water Availability – 2050 Planning Horizon (Acre-Feet per Year)

Year Type		2030	2035	2040	2045	2050
Normal		245,000	245,000	245,000	245,000	245,000
Single Dry-Year		245,000	245,000	245,000	245,000	245,000
Multi-Year Drought	Year 1	245,000	245,000	245,000	245,000	81,800
	Year 2	245,000	245,000	245,000	245,000	81,800
	Year 3	245,000	245,000	245,000	245,000	81,800
	Year 4	245,000	245,000	245,000	245,000	81,800
	Year 5	245,000	245,000	245,000	245,000	81,800

Source: City of Sacramento 2026a.

Minimum-Flow Requirements

Current usage and future development must be sensitive to American River stream flows, especially during dry periods. There are two major institutional constraints that limit the FWTP diversion capacity: Hodge Flow conditions and Extremely Dry Year conditions, described below.

Extremely Dry Years (Conference Years)

Extremely dry years (i.e., Conference Years) are defined as years in which California Department of Water Resources (DWR) projects an annual unimpaired flow into Folsom Reservoir of 550,000 afy or less, or the projected March through November unimpaired flow is less than 400,000 afy. During extremely dry years, the City limits its diversions for water treated at the EAFWTP to 155 cfs and 50,000 afy. Conference Years have occurred on the American River only three times over the recorded hydrologic history: in 1924, 1977, and 2015 (City of Sacramento 2021).

Hodge Flow Conditions

The Water Forum Agreement (WFA) restricts diversions from the American River when flows are below the "Hodge Flow" criteria, as defined in Environmental Defense Fund et al. v. East Bay Municipal Utility District (City of Sacramento 2021). The purveyor specific agreement established with the City under the WFA, allows the diversion of American River water to the EAFWTP of up to 310 cfs (200 million gallons per day [mgd]) when the flow passing the EAFWTP is greater than the Hodge Flow Criteria and extremely dry year conditions do not exist. Although Hodge Flow Conditions and Conference Years may reduce the amount of water that can be diverted from the EAFWTP on the American River, the City can instead divert their remaining American River entitlements downstream at the SRWTP (City of Sacramento 2021).

Groundwater Supply

The City currently has 26 permitted wells in the North American Subbasin and 2 permitted wells in the South American Subbasin; however, only 23 of these wells are operated on a regular basis to supply municipal water. The total pumping capacity of the wells is approximately 23 mgd. Assuming that only 60 to 90 percent of the wells are available at any given time, the total pumping capacity is about 14 to 20 mgd. As of 2020, the average age of the City's active potable wells is about 60 years old with the oldest well at 76 years old (City of Sacramento 2021).

Water Treatment Plants

The SRWTP, located just east of Interstate 5 and south of Richards Boulevard, treats water that is pumped from the Sacramento River about one-half mile downstream of the American River confluence. The diversion capacity at the SRWTP is 160 mgd. The City is permitted to operate the plant at 160 mgd in the summer months and 120 mgd in the shoulder months. However, summer operations can be impacted by unusually low river levels which potentially reduce capacity of the plant to 135 mgd in the summer months. The City is currently evaluating further expansion of the SRWTP to increase the diversion and treatment capacity to 310 mgd.

The EAFWTP is located on the south bank of the lower American River, approximately seven miles upstream from its confluence with the Sacramento River. The plant was designed to be expanded in stages to an ultimate treatment capacity of 404 mgd. The EAFWTP is currently rated at a diversion capacity of 200 mgd, with a permitted treatment

capacity of 160 mgd (80 mgd for Basins 1 and 2, and 80 mgd for Basins 3 and 4). However, the current reliable capacity of the EAFWTP during peak demand periods is 80 mgd, with the ability to operate at up to 100 mgd, but only for short periods of time.

Total Water Supply Relative to Demand

As stated previously, the 2025 UWMP describes the City's available water supply and water demands during normal, single-dry, and multiple-dry years in 5-year increments from 2025 to 2050. Table 4.5-6 compares available supply to projected demand from 2030 to 2050. As shown in Table 4.5-6, the City has ample water supplies to meet demand from 2030 through 2050. The surplus water supply, after meeting anticipated demands, represents approximately 69 percent of the total supply in 2030 and decreases to 60 percent of total supply in 2050.

Table 4.5-6 City of Sacramento Current and Planned Annual Water Demand and Sources of Supply

	2030 (af)	2035 (af)	2040 (af)	2045 (af)	2050 (af)
Surface Water Supply	326,800	326,800	326,800	326,800	326,800
Groundwater Supply	35,864	35,864	35,864	35,864	35,864
Recycled Water Supply	1,000	1,000	1,000	1,000	1,000
Purchased or Imported Water	0	0	0	0	0
Total Water Supply	**363,664**	**363,664**	**363,664**	**363,664**	**363,664**
Water Demand	**111,228**	**120,582**	**129,935**	**136,950**	**143,965**
Surplus (+)/Deficit (-)	252,436	243,082	233,729	226,714	219,699

Notes: af = acre-feet.

Source: City of Sacramento 2026a.

WASTEWATER AND STORMWATER

Wastewater and stormwater runoff from most of the central area of the city (including the project site) is collected by the City's CSS. The CSS serves residences and businesses within 11,240 acres of the city. The CSS is composed of about 345 miles of 4- to 120-inch diameter pipes that drain to the west to two large pump station facilities known as Pump Station 1/1A/1B and Pump Station 2/2A, located near the Sacramento River. Other City facilities include an off-line storage facility known as Pioneer Reservoir that also serves as a primary treatment plant and the CWTP, another primary treatment plant with a capacity of 130 mgd.

The City has an agreement with SacSewer whereby the City can convey a maximum of 60 mgd to the EchoWater Facility for secondary treatment prior to discharge to the Sacramento River. This capacity is sufficient to treat all CSS dry weather sanitary flows (about 17 to 18 mgd) and stormwater from low-intensity storms. During moderate to large storms when the CSS flows are greater than 60 mgd, the flows greater than 60 mgd are routed to CWTP and/or Pioneer Reservoir for temporary storage. When flows exceed storage capacity, the excess flows are released to the Sacramento River after receiving primary treatment, including chlorination and de-chlorination. When the storage and treatment capacities are reached, additional CSS flows are discharged directly to the Sacramento River from Pump Station 1 and/or Pump Station 2.

Because the project site includes existing buildings in downtown Sacramento, existing connections to CSS infrastructure are already in place.

Wastewater Treatment and Disposal

Wastewater treatment within the city is provided by SacSewer and the City of Sacramento. SacSewer operates all regional interceptors and wastewater treatment plants serving the city except for the combined sewer and storm drain treatment facilities, which are operated by the City of Sacramento.

EchoWater Resource Recovery Facility

The EchoWater Facility is operated by the SacSewer. SacSewer is responsible for the treatment and disposal of the majority of the City's municipal wastewater, treating and discharging wastewater generated by the Cities of Sacramento, Citrus Heights, Elk Grove, Rancho Cordova, Folsom, and urbanized areas of the County of Sacramento. The EchoWater Facility is currently permitted to discharge an average dry weather flow of 181 mgd, and a daily peak wet weather flow of 392 mgd.

Combined Wastewater Treatment Plant and Pioneer Reservoir

During moderate to large storms when the CSS flows are greater than 60 mgd, the flows greater than 60 mgd are routed to the CWTP and/or Pioneer Reservoir for temporary storage. When flows exceed storage capacity, the excess flows are released to the Sacramento River after receiving primary treatment, including chlorination and de-chlorination. When the storage and treatment capacities are reached, additional CSS flows are discharged directly to the Sacramento River from Pump Station 1 and/or Pump Station 2.

Combined Sewer Overflows and CSS Improvements

Most of the time, the CSS treatment facilities (CWTP and Pioneer Reservoir) capture and provide treatment for up to 100 percent of the combined sewer flows (Central Valley RWQCB 2026: F-45). The CSS uses a combination of storage, such as in-line storage, and treatment facilities to manage flows in the CSS and minimize CSOs. There have been infrequent instances where small volumes of untreated overflows have occurred from some of the discharge points into the Sacramento River. The City's efforts to comply with the CSO Control Policy have resulted in consistent and significant reductions in dry-weather and dry-season flows over the last 20 years. The overall annual average CSO discharge volume decreased by more than 42 percent over the past 26 years (Central Valley RWQCB 2026: F-45). Water conservation, new plumbing codes for redevelopment, and ongoing collection system improvements are all factors in the gradual decrease in dry- and wet-weather flows over time (Central Valley RWQCB 2026: F-26).

The average number of days that untreated CSOs were discharged per year has also decreased from 7 per year in the early 1990s, before implementation of the CSSIP, to less than 1 per year in the past 10 years. The treated CSO discharges have also decreased from 15 times per year on average to an average of four times per year during the same period. The last untreated release of CSO occurred in the storm year 2022 (Central Valley RWQCB 2015: F-26).

The City captures and provides treatment for up to 100 percent of combined sewer flows, exceeding the minimum 85 percent capture requirement. Over time, the City has implemented numerous capital and operational improvements that have increased system effectiveness and contributed to reductions in both the frequency and volume of CSO discharges. The City continues to evaluate system performance and implement adaptive management measures to further reduce CSOs, optimize operation of the CSS, and maintain compliance with the federal Combined Sewer Overflow Control Policy and NPDES permit requirement.

SOLID WASTE

The waste stream generated in the city of Sacramento is more than 600,569 tons per year and includes everything from residential and commercial refuse to material being recycled to construction and demolition (C&D) material to garden refuse (CalRecycle 2024a). The City collects all residential solid waste within city boundaries. Most of the residential waste is disposed of at the Sacramento County Kiefer Landfill. Commercial solid waste is collected by private franchised haulers authorized by the Sacramento Solid Waste Authority. Seventeen different solid waste haulers provide solid waste collection for commercial properties and businesses in Sacramento. Commercial waste collected in the city is disposed of at various facilities, including Kiefer Landfill, the Yolo County Landfill, and L and D Landfill. For the landfills that serve the city, between 11 percent (L and D Landfill) and 96 percent (Sacramento County Kiefer Landfill) of their respective total capacities remain (Table 4.5-7).

Table 4.5-7 Landfill Capacity

Facility	Daily Permitted Capacity (tons)	Maximum Permitted Capacity (cubic yards)	Remaining Capacity (cubic yards)
L and D Landfill	4,125	20,500,000	1,912,000
Sacramento County Kiefer Landfill	10,815	117,400,000	102,300,000
Elder Creek Transfer and Recovery Station	2,500	NA	NA
North Area Transfer Station	2,400	NA	NA
Sacramento Recycling and Transfer Station	2,500	NA	NA

Sources: CalRecycle 2024b, 2023, n.d.-a, n.d.-b, n.d.-c.

ENERGY

Electricity

SMUD generates, transmits, and distributes electrical power to a 900-square-mile service area that includes Sacramento County and a small portion of Placer and Yolo County. SMUD's electricity sources include hydropower generation; cogeneration; advanced and renewable technologies such as wind, solar, and biomass/landfill gas power; and power purchased on the wholesale market.

Transmission lines run parallel to R Street east of 19th Street and along 19th and 20th Streets south of R Street. These lines connect to SMUD Station B at 19th and O Streets. An underground 115-kV loop connects SMUD Station D at 8th and R Streets. Station D drops the 115 kV down to 21 kV and 12 kV to serve the overall downtown area. The 12-kV system is a high-reliability network with redundant feeds, intended to serve the high-rise core area where it is important to keep critical government and business facilities operating. This 12-kV network serves the existing buildings on the project site. All three buildings on the project site contain transformer vaults connected to the 12-kV network. The transformer vaults in the EDD Headquarters Building and the State Personnel Board Building are part of an interconnected network and serve buildings and facilities outside the project site. Underground infrastructure and circuits are located in several streets bordering the project site.

Natural Gas

PG&E supplies natural gas to the Sacramento area, and to a larger 70,000 square mile service territory. In downtown Sacramento, PG&E has both high-pressure and low-pressure distribution systems. High-pressure system pipelines, generally 4 inches in diameter and larger, carry gas at approximately 40 pounds per square inch (psi). Low-pressure system pipelines, generally 2 inches in diameter, carry gas at about 0.25 psi. Service is generally provided from the low-pressure system unless usage exceeds about 3,000 cubic feet per hour. Regulator stations at various locations are used to reduce high pressure to low pressure.

4.5.3 Environmental Impacts and Mitigation Measures

ANALYSIS METHODOLOGY

Water Demand, Wastewater, and Solid Waste

Impacts on water supply, wastewater conveyance and treatment, solid waste disposal, and associated infrastructure that would result from the project were identified by determining the existing service capacity and comparing that capacity against future demand associated with project implementation. When possible, a quantitative comparison was used to determine impacts of the project on utility systems. Evaluation of potential water supply impacts are based on the City's UWMP, wastewater effects on capacity of the Sac Sewer system, and solid waste impacts are evaluated based on landfill capacity and the project's anticipated solid waste generation and disposal needs.

Energy

Electricity

Impacts related to electricity were evaluated by determining whether any new facilities would need to be constructed to serve the project, whether SMUD would be able to serve the project, and whether the implementation of the project would adversely affect SMUD electrical infrastructure or interrupt utility service during construction.

Natural Gas

Similar to electricity, impacts related to natural gas were evaluated by determining whether any new facilities would need to be constructed to serve the project, and whether any utility services would be interrupted during demolition or construction.

THRESHOLDS OF SIGNIFICANCE

A utilities and service systems impact is considered significant if implementation of the Capitol Mall Office Buildings Demolition Project would do any of the following:

- require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects;
- have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years;
- result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments;
- generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; or
- comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

ISSUES NOT DISCUSSED FURTHER

All issues identified in the thresholds of significance are evaluated in this section.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 4.5-1: New or Expanded Utility Infrastructure

Implementation of the Capitol Mall Office Buildings Demolition Project would result in demolition of three state-owned office buildings followed by land transfer and future development of the site, presumably by Sac State for higher education and related mixed uses. Demolition activities would involve the disconnection or removal of existing utility connections and would not require new or expanded utility infrastructure. While utility upgrades and improvements may be required to support future development, such improvements would be local, of limited scale, within streets and/or existing utility alignments, and follow applicable utility provider and City of Sacramento design standards. Further, the potential environmental effects of construction activities (e.g., air emissions, noise, construction traffic) within the identified project footprint and in streets and sidewalks in the vicinity of the project area are evaluated throughout this EIR as part of the proposed project. Therefore, implementation of the project would not require or result in the construction or relocation of new or expanded utility facilities that could cause significant environmental effects. This impact would be **less than significant**.

Demolition

Abatement and demolition of the three state-owned buildings would not result in the need for new or expanded utilities services because the buildings would be vacated prior to abatement and disconnected from utility services as part of demolition. Existing water, wastewater, electricity, natural gas, and telecommunication services and infrastructure serving the buildings would be disconnected or removed as part of the demolition process. DGS would coordinate with utility providers throughout the demolition process to ensure little to no disruption of utility services or inconvenience to existing utility customers. For example, coordination with SMUD regarding removal of the transformer vaults located in the three buildings that are components of the local electrical service system and, where needed, connecting remaining buildings to electric service via other means. In addition, DGS would coordinate with the City of Sacramento Department of Public Works where encroachment permits from the City are required (e.g., utility work in City streets) regarding any disconnections or re-routing of utilities to maintain service to facilities outside the project site.

Although abatement and demolition activities would require limited temporary utility use to support personnel and equipment, these demands would be minor, temporary, and accommodated by existing utility infrastructure that was designed to serve the three existing office buildings at full occupancy.

In summary, abatement and demolition activities would not increase demand for utility services; would not result in a disruption of utility service; and would not require the construction, relocation, or expansion of water, wastewater, stormwater, electrical, natural gas, or telecommunications infrastructure.

Future Development

While proposed future land uses are not finalized, it is likely that modifications and improvements to onsite and nearby utility infrastructure would be implemented in a manner necessary to serve proposed new uses. While total demand for electricity, natural gas, water supply, and wastewater conveyance and treatment capacity for the future development is conceptual, it is expected that—because it will replace three substantial State buildings in a largely built out urban environment—no substantial upgrades or expansions to offsite utility facilities or infrastructure would be required. Utility delivery infrastructure improvements that would result from the proposed project would be within the local development footprint and nearby streets and sidewalks, and may include trenching, installation of additional or larger pipes, conduit, and associated infrastructure. Trenching activities would occur in compliance with BMPs set forth in the Stormwater Quality Design Manual for the Sacramento Region or the equivalent. The entity implementing development (presumed to be Sacramento State) would coordinate with utility providers to identify any needed utility delivery system modifications and to implement those modifications. In addition, the entity implementing development would coordinate with the City of Sacramento Department of Public Works where encroachment permits from the City are required (e.g., utility work in City streets) and work would be implemented in accordance with applicable building codes and City requirements. The potential environmental effects of these kinds of localized utility infrastructure modifications and improvement (e.g., air emissions, noise, construction traffic) have been evaluated throughout this EIR, as they are included in the project.

As with project demolition activities, construction of future development could potentially interrupt utility services to existing land uses if there was inadvertent damage to existing infrastructure or the need to reroute existing lines. The entity implementing the future development would coordinate as needed with utility providers and the City throughout the design and construction process to ensure little or no disruption of utility services and inconvenience to existing utility customers. This coordination would prevent the potential for damage to existing utility lines and provide adequate coordination for any required interim rerouting, thus avoiding the potential for interruption of existing utility service.

Conclusion

Abatement and demolition activities would not require new or expanded utility infrastructure because existing utility connections serving the three state-owned buildings would be disconnected or removed as part of demolition, and utility requirements of demolition activities would be accommodated by existing systems. Future development of the project site may include utility upgrades or improvements. However, such improvements would occur within the project footprint and nearby areas. No substantial modification or upgrade of any offsite utility systems or infrastructure would be required. Through coordination with utility providers, as well as compliance with applicable

permitting requirements, the potential for utility service interruptions to surrounding land uses would be minimized. Construction of the necessary utility connections and upgrades associated with the development of future uses are evaluated as part of the project throughout this EIR. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.5-2: Adequate Water Supplies

By their nature, abatement and demolition activities for the three state-owned office buildings would not result in an increase in water demand. Future development is estimated to result in water demand of approximately 376 afy, as compared to a historical pre-project water demand of approximately 53 afy at the project site when the buildings were fully occupied and 2 afy under current conditions. Once operational, the estimated project water demand would represent an approximately 323 afy increase in water demand compared to pre-project conditions when the buildings were at full occupancy and a 374 afy increase relative to existing conditions. The City's projected surplus water supply is 252,436 afy for 2030 and 216,699 for 2050. The additional project demand relative to existing conditions of approximately 374 afy during operation would represent less than 0.15 percent of the City's projected 2030 surplus water supply and a little over 0.17 percent of the City's projected 2050 surplus water supply. The City is projected to have sufficient water supplies via surface water and groundwater sources to meet demands during normal, single dry, and multiple dry years through 2050. This impact would be **less than significant**.

Demolition

Abatement and demolition activities associated with the three state-owned buildings would not result in a substantial increase in water usage or demand, as buildings would be vacated prior to abatement and disconnected from utility services as part of demolition. While limited quantities of water may be used for activities such as dust control during demolition, this use would be temporary, minimal, and substantially less than the water demand associated with building occupancy. As a result, demolition and abatement activities would not create a new or substantial demand for water supplies, nor would they require new or expanded water supply infrastructure.

Future Development

Similar to demolition, water demand during construction of future development would not create a new or substantial demand for water supplies, nor would it require new or expanded water supply infrastructure. The estimate of 325 construction employees during peak construction periods (see Section 4.3, "Population, Employment, and Housing") is far below the approximately 2,658 employees that historically occupied the existing buildings. In addition, as described below, there is sufficient water supply available to serve project development, which has a far greater demand than project construction.

The existing buildings are currently occupied by approximately 86 employees, with an estimated current water demand of approximately 2 afy. Historically, the buildings were occupied by approximately 2,658 employees, which resulted in an estimated water demand of approximately 53 afy. Thus, current water demand at the project site is substantially less than the demand historically associated with full occupancy of the existing buildings. The existing buildings currently generate water demand associated with heating and cooling, which is provided by the State's Central Plant. The Central Plant is permitted for its full capacity water demand (DGS 2015: 6). The full capacity of the Central Plant includes all of the existing buildings it serves and new State buildings. Following demolition and future development, the project would be entirely served by City utilities, including potable water.

Note that all water demand estimates in this discussion were calculated using the water demand factors provided in the *City of Sacramento SB 610/SB 221 Water Supply Assessment and Certification Form* (City of Sacramento 2026b). As indicated in Section 4.2, "Land Use and Planning," the project site is located in the City's Central Business District, and water demand factors for this area were used.

Future development would include a mix of academic, residential, hospitality, commercial, entertainment, parking, and related uses, with approximately 3,630,000 gross square feet (GSF) of development anticipated at full buildout.

Based on water demand factors from the *City of Sacramento SB 610/SB 221 Water Supply Assessment and Certification Form*, full buildout of future development is estimated to result in water demand of approximately 376 afy. This likely overestimates the actual water demand as the 250 hotel rooms were each counted as a residential unit and each of the 4,500 students associated with the School of Public Affairs was counted as an employee in the demand calculation. The additional water demand associated with future development, relative to historical full-occupancy conditions, would be approximately 323 afy. Compared to existing water demand, the additional water demand associated with future development would be approximately 374 afy. Both of these amounts represent less than 0.15 percent of the City's projected surplus water supply of 252,436 afy in 2030 and a little over 0.17 percent of the City's projected surplus water supply of 219,699 afy in 2050. The City is projected to have sufficient water supplies via surface water and groundwater sources to meet demands during normal, single dry, and multiple dry years through 2050 (Table 4.5-6). Therefore, projected water demands associated with future development would be accommodated by the City's existing and planned water supply system.

Conclusion

Abatement, demolition, and future construction activities would not result in a substantial increase in water demand. The existing buildings are currently occupied by approximately 86 employees, resulting in an estimated water demand of approximately 2 afy, while historical full occupancy of approximately 2,658 employees would have resulted in an estimated demand of approximately 53 afy. Demolition activities would occur after the buildings are vacated and disconnected from utility services and would result in only limited, temporary water use for activities such as dust control. Future construction would result in water demand far below the demand generated by development.

Future development would include approximately 3,630,000 GSF of new uses at full buildout and is preliminarily estimated to result in an additional water demand of approximately 374 afy relative to existing demand. The additional demand would represent a little over 0.17 percent of the City's projected surplus water supply through 2050. Projected water demands would therefore be accommodated by the City's existing and planned water supply system, which has adequate capacity under normal and dry-year conditions. For these reasons, this impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.5-3: Wastewater Infrastructure and Treatment Capacity

Abatement and demolition activities for the three state-owned buildings would not result in a substantial increase in wastewater flows because the buildings would be vacated prior to abatement and disconnected from utility services as part of demolition. Future development would result in increased wastewater generation compared to current conditions; however, wastewater generation would be reduced through implementation of water conservation and efficiency measures. The City would have sufficient dry-weather wastewater treatment capacity to serve future development, and the project would be subject to applicable requirements and fees for new or modified connections to the CSS. Although the CSS and its treatment facilities do not have sufficient capacity to treat all wastewater and stormwater flows during certain storm events, exceedance of treatment capacity is a rare event, and the City is implementing improvements to the CSS. Therefore, this impact would be **less than significant**.

The project site is served by the City of Sacramento's CSS for conveyance of wastewater. For purposes of this analysis, wastewater generation is conservatively assumed to be equivalent to potable water demand. In reality, the volume of wastewater generated by a mixed-use development is less than the total water delivered.

Demolition

Under historical full-occupancy conditions, the three state-owned office buildings are estimated to generate approximately 53 afy of wastewater. Under current conditions, the buildings are estimated to result in a wastewater generation of approximately 2 afy. Thus, wastewater generation at the project site under current conditions is substantially lower than it was when the buildings were at full occupancy.

The buildings would be vacated prior to abatement and disconnected from utility services as part of demolition activities. As a result, wastewater generation associated with building occupancy would cease during demolition. Limited wastewater could be generated by abatement and demolition personnel; however, this generation would be temporary and minimal relative to wastewater generation associated with building occupancy and would be accommodated by existing wastewater infrastructure or portable facilities, as appropriate. Therefore, abatement and demolition activities would not result in a substantial increase in wastewater generation or require new or expanded wastewater treatment facilities.

Future Development

Future development would include a mix of academic, residential, hospitality, commercial, entertainment, parking, and related uses, with a total development program anticipated to comprise approximately 3,630,000 GSF at full buildout. As stated above, for purposes of this analysis, wastewater generation is conservatively assumed to be equivalent to potable water demand.

Based on the water demand analysis (see the discussion of Impact 4.5-2), future development would generate approximately 376 afy of wastewater at full buildout. In comparison, wastewater generation under historical full-occupancy conditions at the existing buildings was estimated at approximately 53 afy. Current wastewater generation is estimated to be approximately 2 afy. Thus, the wastewater generation associated with future development would be approximately 323 afy greater than the estimated wastewater generation associated with historical full occupancy of the existing buildings and 374 afy greater than existing conditions. 374 afy converts to approximately 0.33 mgd.

The City of Sacramento's current average dry-weather flow to SacSewer EchoWater Facility is approximately 18 million gallons per day (mgd), and the City's operating agreement with SacSewer allows the City to convey up to 60 mgd to the facility. Thus, during dry-weather conditions, approximately 42 mgd of available conveyance and treatment capacity would remain, which would be sufficient to accommodate the 0.33 mgd of estimated wastewater flows associated with future development of the project site. The 0.33 mgd of wastewater flows generated by the project is equivalent to approximately 0.8 percent of the available conveyance and treatment capacity.

Connections to the City's CSS would be made at existing mains currently serving the project site. Given the amount and type of planned future development relative to the existing office buildings, wastewater generation would increase compared to current conditions and could require larger, and potentially additional, wastewater conveyance pipelines connecting future buildings to the CSS. It is assumed that new wastewater lines could follow the alignments of existing wastewater lines, or new alignments could be established as necessary in streets and other existing rights of way based on final site design. Any new or modified connections would be designed in accordance with applicable building codes and City requirements. These kinds of underground utility modifications and improvements in the vicinity of the project site are considered part of the proposed project and the environmental effects are considered throughout this EIR. Because the project site is already served by the CSS, new connections and modifications to existing connections may be required. Prior to construction, the entity conducting redevelopment (e.g., Sacramento State) would coordinate with the City to determine the necessary improvements to the existing wastewater conveyance system.

During storm events, wastewater and stormwater flows in the CSS can exceed 60 mgd. Excess flows are conveyed to the CWTP and Pioneer Reservoir for treatment before being discharged to the Sacramento River. During peak storm events, CSS in-line storage and the treatment capacities of the CWTP and Pioneer Reservoir can be exceeded, which can result in untreated CSOs being released to the Sacramento River. Although the number of treated and untreated CSOs released to the Sacramento River has substantially declined, the CSS and associated treatment facilities do not have sufficient capacity to treat all wastewater, and stormwater flows during certain storm events. However, exceedance of treatment capacity at the CWTP and Pioneer Reservoir is a rare event, occurring approximately once every 10 years, and the City is implementing the Combined Sewer System Improvement Plan (CSSIP) to make improvements throughout the system. The project would also be subject to applicable City requirements and fees associated with connections to and improvements of the CSS.

Conclusion

Because wastewater generation would cease during demolition and the City would have sufficient dry-weather wastewater treatment capacity to serve future development, the project would not adversely affect the City's wastewater conveyance or treatment capacity. Although future development would increase wastewater generation compared to current conditions, the project would be subject to applicable City requirements and fees for new or modified connections to the CSS. Therefore, this impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.5-4: Landfill Capacity and Compliance with Solid Waste Regulations

Implementation of the proposed project would result in the demolition of three state-owned office buildings, generating approximately 140,815 cubic yards (cy) of debris. In addition, the project includes nine land use types with the potential to generate approximately 2,400 cy of solid waste annually during operation. The proposed project would be required to comply with all applicable federal, State, and local statues and regulations related to the management and reduction of solid waste. Additionally, landfills within the region have adequate capacity for disposal of solid waste generated by the project. Thus, this impact would be **less than significant**.

Demolition

The proposed project would involve the demolition of three state-owned office buildings that have a combined floor area of approximately 729,700 square feet. It is estimated that abatement and demolition will generate approximately 140,815 cy of material to be removed from the project site (see Chapter 3, "Project Description").

All hazardous materials would be taken to a facility authorized to accept these materials and would be transported in compliance with all applicable laws and safety requirements. A material recycling program would be implemented as part of building demolition; however, at this time, the specific types of materials that will be recycled and the potential volume of recycled materials are not known. It is likely that a large volume of concrete rubble will be taken to a local recycling facility to be ground and re-used. Rebar within the concrete rubble may also be recycled. All materials that are not recycled will be taken to a landfill.

Multiple landfills, including Sacramento County Kiefer Landfill, L and D Landfill, and recycling and transfer stations, are located throughout the region. The Kiefer Landfill has a remaining capacity of 102,300,000 cy (approximately 87 percent of permitted capacity of 117,400,000 cy) (Table 4.5-7). The L and D Landfill has a remaining capacity of 1,912,000 cy (approximately 9 percent of permitted capacity of 20,500,000 cy) (Table 4.5-7). If waste haulers choose to take demolition waste to one of the nearby landfills, the entirety of the project's demolition waste of 140,815 cy, would be 7.36 percent of L and D Landfill's remaining capacity, 0.14 percent of Kiefer Landfill's remaining capacity, and 0.13 percent of the combined capacity of these two facilities. These percentages represent a scenario where there is no reduction in demolition waste from diversion of material to recycling facilities and no abatement materials are sent to other authorized landfills. However, even under these conditions, there is adequate capacity at landfills in the region for disposal of solid waste generated by project demolition.

Future Development

Construction associated with future development would generate construction and operation-related solid waste. Future land uses would include a mix of academic, hospitality, commercial, entertainment, parking, and related uses with a total development program anticipated to comprise approximately 3,630,000 sf at full buildout.

Individual businesses, including State buildings and facilities, are required to contract for their own solid waste collection service. Commercial solid waste haulers can dispose of the collected waste at any landfill facility or transfer station they select. Multiple landfills, including Sacramento County Kiefer Landfill, L and D Landfill, and recycling and transfer stations, are located throughout the region. Table 4.5-7, above, shows the permitted daily disposal capacities, total landfill capacity, and remaining landfill capacity of these facilities. Operation of the project is estimated to generate approximately 2,400 tons of waste per year. The estimated amount of waste generated by the project on a

daily basis (i.e., 6.6 tons) would represent approximately 0.26 to 0.28 percent of the permitted daily disposal capacity of the transfer stations, 0.16 percent of the L and D Landfill daily permitted capacity, and 0.06 percent of Kiefer Landfill's permitted daily disposal capacity. There is adequate capacity at landfills in the region for disposal of solid waste generated by project development and operation.

Conclusion

There is adequate capacity at landfills in the region for disposal of solid waste generated by demolition of the existing buildings and construction and operation of future development. Therefore, this impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

4.6 AIR QUALITY

This section includes a discussion of existing air quality conditions, a summary of applicable regulations, and an analysis of potential demolition, construction, and operational air quality impacts caused by proposed implementation of the project. Mitigation is provided as necessary to reduce significant air quality impacts to the extent feasible.

One comment related to air quality was received from the Sacramento Metropolitan Air Quality Management District (SMAQMD) in response to the Notice of Preparation (see Appendix A). SMAQMD requested analysis of potential air quality, greenhouse gas, and climate change impacts; public health risks associated with demolition activities, including asbestos exposure; alternatives involving reuse of the existing buildings; impacts associated with the landfilling, recycling, or reuse of demolition materials; consistency with regional air quality planning efforts; and consistency with local policies supporting adaptive reuse and preservation of existing structures. These issues are addressed in this section, with the exception of greenhouse gas emissions, which are addressed in Section 4.7, "Greenhouse Gas Emissions and Climate Change"; asbestos exposure, which is addressed in Section 4.12, "Hazards and Hazardous Materials"; alternatives, which are addressed in Chapter 7, "Alternatives"; and consistency with local policies, which are addressed in Section 4.2, "Land Use and Planning."

4.6.1 Regulatory Setting

Air quality in the project area is regulated through the efforts of various federal, State, regional, and local government agencies. These agencies work jointly, as well as individually, to improve air quality through legislation, planning, policymaking, education, and a variety of programs. The agencies responsible for improving the air quality within the air basins are discussed below.

FEDERAL

The US Environmental Protection Agency (EPA) has been charged with implementing national air quality programs. EPA's air quality mandates draw primarily from the federal Clean Air Act (CAA), which was enacted in 1970. The most recent major amendments were made by Congress in 1990. EPA's air quality regulatory efforts address criteria air pollutants and hazardous air pollutants (HAPs), including fuel economy standards. EPA regulations concerning criteria air pollutants and HAPs are presented in greater detail below.

Fuel Economy Standards

The US Department of Transportation (DOT) National Highway Traffic Safety Administration (NHTSA) regulates vehicle emissions through the Corporate Average Fuel Economy (CAFE) Standards. The CAFE Standards, first enacted by Congress in 1975, set fleetwide averages that each automaker must achieve for its car and truck fleet. The purpose of the CAFE Standards is to reduce energy consumption by increasing the fuel economy of cars and light trucks. In 2024, CAFE Standards were finalized for model years (MYs) 2027–2031. The final rule established standards that require an industry-wide fleet average of approximately 49 miles per gallon (mpg) for passenger cars and light trucks. The final rule established standards that require an industry-wide fleet average of approximately 50.4 mpg in MY 2031 for passenger cars and light trucks and an industry-wide fleet average for heavy-duty pickup trucks and vans (HDPUVs) of roughly 2.851 gallons per 100 miles in MY 2035. The final CAFE Standards increase by 2 percent per year for passenger cars in MYs 2027–2031 and by 2 percent per year for light trucks in MYs 2029–2031. The final HDPUV fuel efficiency standards increase at a rate of 10 percent per year in MYs 2030–2032 and 8 percent per year in MYs 2033–2035 (NHTSA 2025a).

On December 5, 2025, NHTSA published a proposal to "substantially recalibrate" the CAFE program, including amending the fuel economy standards for light-duty vehicles for model MYs 2022–2026 and MYs 2027–2031. The proposal would set fuel economy standards that increase from newly proposed MY 2022 standards at a rate of 0.5 percent per year through MY 2026, followed by 0.25 percent per year through MY 2031, with MY 2027 stringency

established as a bridge between the two sets of standards. NHTSA projects that the amended standards would correspond to an industry-wide fleet average for all light-duty vehicles of roughly 34.5 mpg in MY 2031 (NHTSA 2025b). Public comment on the proposal was open through January 20, 2026. As of the date of this writing, NHTSA has not finalized the proposal.

Construction Equipment Emission Standards

EPA established tiered emissions standards for construction equipment (i.e., nonroad diesel engines) to phase in cleaner-burning equipment that will reduce nitrogen oxides (NO_X) and particulate matter (PM) emissions from exhaust. As of 2014, all construction equipment manufactured in the United States is required to meet the highest tier of emission standards; Tier 4. EPA oversees implementation of these regulations (Code of Federal Regulations [CFR] Chapter 40, Parts 1039, 1065, and 1068).

Criteria Air Pollutants

The CAA required EPA to establish the National Ambient Air Quality Standards (NAAQS) (US Code [USC] Title 42, Section 7409). As shown in Table 4.6-1, EPA has established primary and secondary NAAQS for the following criteria air pollutants: ozone, carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), respirable PM with an aerodynamic diameter of 10 micrometers or less (PM_{10}), fine PM with an aerodynamic diameter of 2.5 micrometers or less ($PM_{2.5}$), and lead. The primary standards protect public health, and the secondary standards protect public welfare. The CAA also requires each state to prepare a state implementation plan (SIP) to attain and maintain the NAAQS. The federal CAA amendments of 1990 added requirements for states with nonattainment areas to revise their SIPs to incorporate additional control measures to reduce air pollution. Individual SIPs are periodically modified to reflect the latest emissions inventories, planning documents, and rules and regulations of the air basins, as reported by their jurisdictional agencies. EPA is responsible for reviewing all SIPs to determine whether they conform to the mandates of the CAA and its amendments and whether implementation will achieve air quality goals. If EPA determines that a SIP is inadequate, a federal implementation plan that imposes additional control measures may be prepared for the nonattainment area. If an approvable SIP is not submitted or implemented within the mandated time frame, sanctions may be applied to transportation funding and stationary air pollution sources in the air basin.

Table 4.6-1 National and California Ambient Air Quality Standards

Pollutant	Averaging Time	California (CAAQS)[a,b]	National (NAAQS)[c] Primary[b,d]	National (NAAQS)[c] Secondary[b,e]
Ozone	1-hour	0.09 ppm (180 µg/m^3)	—	Same as primary standard
	8-hour	0.070 ppm (137 µg/m^3)	0.070 ppm (147 µg/m^3)	
Carbon monoxide (CO)	1-hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)	Same as primary standard
	8-hour	9 ppm (10 mg/m^3)	9 ppm (10 mg/m^3)	
Nitrogen dioxide (NO_2)	Annual arithmetic mean	0.030 ppm (57 µg/m^3)	53 ppb (100 µg/m^3)	Same as primary standard
	1-hour	0.18 ppm (339 µg/m^3)	100 ppb (188 µg/m^3)	—
Sulfur dioxide (SO_2)	24-hour	0.04 ppm (105 µg/m^3)	—	—
	3-hour	—	—	0.5 ppm (1300 µg/m^3)
	1-hour	0.25 ppm (655 µg/m^3)	75 ppb (196 µg/m^3)	—
Respirable particulate matter (PM_{10})	Annual arithmetic mean	20 µg/m^3	—	Same as primary standard
	24-hour	50 µg/m^3	150 µg/m^3	
Fine particulate matter ($PM_{2.5}$)	Annual arithmetic mean	12 µg/m^3	9.0 µg/m^3	15.0 µg/m^3
	24-hour	—	35 µg/m^3	Same as primary standard
Lead f	Calendar quarter	—	1.5 µg/m^3	Same as primary standard
	30-day average	1.5 µg/m^3	—	—
	Rolling 3-month average	—	0.15 µg/m^3	Same as primary standard

Pollutant	Averaging Time	California (CAAQS)[a,b]	National (NAAQS)[c] Primary[b,d]	National (NAAQS)[c] Secondary[b,e]
Hydrogen sulfide	1-hour	0.03 ppm (42 µg/m3)	No national standards	
Sulfates	24-hour	25 µg/m3		
Vinyl chloride f	24-hour	0.01 ppm (26 µg/m3)		
Visibility-reducing particulate matter	8-hour	Extinction of 0.23 per km		

Notes: $\mu g/m^3$ = micrograms per cubic meter; km = kilometers; ppb = parts per billion; ppm = parts per million.

[a] California standards for ozone, carbon monoxide, SO_2 (1- and 24-hour), NO_2, particulate matter, and visibility-reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

[b] Concentration is expressed first in units in which it was promulgated. Equivalent units given in parentheses are based on a reference temperature of 25 degrees Celsius (°C) and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

[c] National standards (other than ozone, particulate matter, and those based on annual averages or annual arithmetic means) are not to be exceeded more than once a year. The ozone standard is attained when the fourth-highest 8-hour concentration in a year, averaged over three years, is equal to or less than the standard. The PM_{10} 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 $\mu g/m^3$ is equal to or less than one. The $PM_{2.5}$ 24-hour standard is attained when 98 percent of the daily concentrations, averaged over 3 years, are equal to or less than the standard. Contact the US Environmental Protection Agency for further clarification and current federal policies.

[d] National primary standards: The levels of air quality necessary, with an adequate margin of safety, to protect the public health.

[e] National secondary standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

[f] The California Air Resources Board has identified lead and vinyl chloride as toxic air contaminants with no threshold of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

Source: CARB 2024.

As shown in Table 4.6-2, Sacramento County does not attain the following NAAQS and CAAQS as of the writing of this document: 24-hour federal standards for $PM_{2.5}$, eight-hour federal and state ozone standards, one-hour state ozone standard, and 24-hour and annual state standards for PM_{10}.

Table 4.6-2 Sacramento County Attainment Status

Pollutant	National Ambient Air Quality Standard	California Ambient Air Quality Standard
Ozone	Attainment (1-hour)[1]	Nonattainment (1-hour) Classification–Serious[2]
	Nonattainment (8-hour)[3] Classification–Severe-15	Nonattainment (8-hour)
	Nonattainment (8-hour)[4] Classification–Serious	Nonattainment (8-hour)
Respirable particulate matter (PM_{10})	Attainment (24-hour)	Nonattainment (24-hour)
	Attainment (24-hour)	Nonattainment (Annual)
Fine particulate matter ($PM_{2.5}$)	Nonattainment (24-hour)	(No State Standard for 24-Hour)
	Attainment (Annual)	Attainment (Annual)
Carbon monoxide (CO)	Attainment (1-hour)	Attainment (1-hour)
	Attainment (8-hour)	Attainment (8-hour)
Nitrogen dioxide (NO_2)	Unclassified/Attainment (1-hour)	Attainment (1-hour)
	Unclassified/Attainment (Annual)	Attainment (Annual)
Sulfur dioxide (SO_2)[5]	(Attainment Pending) (1-Hour)	Attainment (1-hour)
	(Attainment Pending) (1-Hour)	Attainment (24-hour)
Lead (Particulate)	Attainment (3-month rolling average)	Attainment (30-day average)

Pollutant	National Ambient Air Quality Standard	California Ambient Air Quality Standard
Hydrogen Sulfide	No Federal Standard	Unclassified (1-hour)
Sulfates		Attainment (24-hour)
Visibly Reducing Particles		Unclassified (8-hour)
Vinyl Chloride		Unclassified (24-hour)

[1] Air quality meets federal 1-hour ozone standard (77 *Federal Register* 64036, October 18, 2012). The US Environmental Protection Agency (EPA) revoked this standard, but some associated requirements still apply. The Sacramento Metropolitan Air Quality Management District (SMAQMD) attained the standard in 2009. SMAQMD has requested that EPA recognize attainment to fulfill the requirements.

[2] Per Health and Safety Code Section 40921.5(c), the classification is based on 1989–1991 data, and therefore does not change.

[3] 2008 Standard.

[4] 2015 Standard.

[5] 2010 Standard.

Sources: EPA 2026; CARB 2023.

Sacramento County was classified as "serious" for nonattainment of the 2015 eight-hour ozone standard. In addition, in October 2010, the SMAQMD prepared the *PM_{10} Implementation/Maintenance Plan and Redesignation Request for Sacramento County*. EPA approved the PM_{10} plan, which allowed EPA to proceed with the redesignation of Sacramento County as attainment for the PM_{10} NAAQS (SMAQMD 2021).

Public Law No. 119-15

On June 12, 2025, Public Law 119-15, enacting House Joint Resolution 87, was signed into law. The law used the Congressional Review Act (CRA) to nullify EPA's action granting California a waiver to enforce stricter emissions standards for heavy-duty vehicles under the CAA. The nullified waiver included programs such as the Advanced Clean Trucks regulation and zero-emission requirements for airport shuttles. Public Law 119-15 prevents EPA from implementing or reissuing the same or similar rules without new congressional authorization. This effectively blocks California and other states that follow its standards from enforcing these specific vehicle emission and warranty regulations.

Public Law No. 119-16

Similarly, on June 12, 2025, Public Law No. 119-16, enacting House Joint Resolution 88, became law. The law also relied on the CRA to void the EPA's December 2024 waiver under the CAA that allowed California to implement and enforce the Advanced Clean Cars (ACC) II regulation. ACC II included a zero-emission vehicle (ZEV) mandate targeting 100 percent new light-duty ZEV sales by 2035.

Public Law No. 119-17

Similarly, on June 12, 2025, Public Law No. 119-17, enacting House Joint Resolution 89, became law. The law also relied on the CRA to void the EPA's January 6, 2025, waiver under the CAA that allowed California to implement and enforce the "Omnibus Low NOx Regulation." The Omnibus Regulation sought to significantly reduce NOx emissions from heavy-duty vehicles with the potential for indirect effects on fuel efficiency and mileage.

Together Public Laws 119-15, 119-16, and 119-17 (collectively, the CRA Resolutions) mark the first time that the CRA has been used to revoke waivers granted by EPA under the CAA. California has filed litigation challenging all three enactments. As of the date of this writing, the CRA Resolutions have not been overturned or stayed. In response to these federal actions, CARB adopted the Emergency Vehicle Emissions Regulations as a temporary measure to retain enforcement of its medium- and heavy-duty vehicle standards.

Hazardous Air Pollutants and Toxic Air Contaminants

Toxic air contaminants (TACs), or, in federal parlance, HAPs, are a defined set of airborne pollutants that may pose a present or potential hazard to human health. A TAC is defined as an air pollutant that may cause or contribute to an increase in mortality or serious illness or that may pose a hazard to human health. A substance that is listed as a HAP

pursuant to subsection (b) of Section 112 of the CAA (42 USC Section 7412[b]) is considered a TAC. TACs are usually present in minute quantities in the ambient air; however, their high toxicity or health risk may pose a threat to public health even at low concentrations.

A wide range of sources, from industrial plants to motor vehicles, emit TACs. The health effects associated with TACs are quite diverse and generally are assessed locally, rather than regionally. TACs can cause long-term health effects, such as cancer, birth defects, neurological damage, asthma, bronchitis, and genetic damage, or short-term acute effects, such as eye-watering, respiratory irritation (a cough), running nose, throat pain, and headaches.

For evaluation purposes, TACs are separated into carcinogens and noncarcinogens based on the nature of the physiological effects associated with exposure to pollutants. Carcinogens are assumed to have no safe threshold below which health impacts would not occur. This contrasts with criteria air pollutants, for which acceptable levels of exposure are determined and for which ambient standards have been established (Table 4.6-1). Cancer risk from TACs is expressed as excess cancer cases per one million exposed individuals, typically over a lifetime of exposure.

EPA and, in California, the California Air Resources Board (CARB) regulate HAPs and TACs, respectively, through statutes (e.g., 42 USC Section 7412[b]) and regulations that generally require the use of the maximum achievable control technology or best available control technology (BACT) for toxics to limit emissions.

STATE

Criteria Air Pollutants

CARB is the agency responsible for coordinating and overseeing state and local air pollution control programs in California and for implementing the California Clean Air Act (CCAA). The CCAA, which was adopted in 1988, required CARB to establish California Ambient Air Quality Standards (CAAQS) (Table 4.6-1). CARB has established CAAQS for sulfates, hydrogen sulfide, vinyl chloride, visibility-reducing PM, and the above-mentioned criteria air pollutants. In most cases, the CAAQS are more stringent than the NAAQS. Differences in the standards are generally explained by the health-effects studies considered during the standard-setting process and the interpretation of the studies. In addition, the CAAQS incorporate a margin of safety to protect sensitive individuals.

The CCAA requires that all local air districts in the state endeavor to attain and maintain the CAAQS by the earliest date practical. It specifies that local air districts should focus particular attention on reducing the emissions from transportation and areawide emission sources, and it provides air districts with the authority to regulate indirect emission sources.

CARB regulates the emissions of criteria air pollutants through several programs, regulations, and plans. The 2022 State SIP Strategy (2022 SIP) serves as a compilation document of all actions taken by CARB and local air districts to further the attainment of the NAAQS. In addition, Assembly Bill (AB) 1346 directs CARB to ban gas-powered small off-road engines (SOREs). EPA has granted CARB a waiver from federal CAA preemption for its current SORE regulations. CARB began implementing regulations beginning with the 2026 MY. The regulations apply to manufacturers, sellers, retailers, and distributors producing, distributing, and selling new spark-ignition engines less than or equal to 25 horsepower and require that they certify and label those engines. The regulations do not require current owners or end users to stop using their existing gas-powered tools (CARB 2025).

Toxic Air Contaminants

TACs in California are regulated primarily through the Tanner Air Toxics Act (AB 1807, Chapter 1047, Statutes of 1983) and the Air Toxics Hot Spots Information and Assessment Act of 1987 (AB 2588, Chapter 1252, Statutes of 1987). AB 1807 sets forth a formal procedure for CARB to designate substances as TACs. Research, public participation, and scientific peer review are required before CARB can designate a substance as a TAC. To date, CARB has identified more than 21 TACs and adopted EPA's list of HAPs as TACs. Most recently, PM exhaust from diesel engines (diesel PM) was added to CARB's list of TACs.

After a TAC is identified, CARB adopts an airborne toxics control measure for sources emitting that particular TAC. If a safe threshold exists for a substance at which there is no toxic effect, the control measure must reduce exposure below that threshold. If no safe threshold exists, the measure must incorporate the BACT for toxics to minimize emissions.

The Hot Spots Act requires that existing facilities that emit toxic substances above a specified level prepare an inventory of toxic emissions, prepare a risk assessment if emissions are significant, notify the public of significant risk levels, and prepare and implement risk reduction measures.

CARB has adopted diesel exhaust control measures and more stringent emissions standards for various transportation-related mobile sources of emissions, including transit buses and off-road diesel equipment (e.g., tractors, generators). Over time, the replacement of older vehicles will result in a vehicle fleet that produces substantially lower levels of TACs than under current conditions. Mobile-source emissions of TACs (e.g., benzene, 1-3-butadiene, diesel PM) have been reduced significantly over the last decade and will be reduced further in California through a progression of regulatory measures (e.g., Low Emission Vehicle/Clean Fuels and Phase II reformulated gasoline regulations) and control technologies. With the implementation of CARB's Risk Reduction Plan and other regulatory programs, it is estimated that emissions of diesel PM will be less than half of those in 2010 by 2035 (CARB 2020). Adopted regulations are also expected to continue to reduce formaldehyde emissions emitted by cars and light-duty trucks. As emissions are reduced, it is expected that risks associated with exposure to emissions will also be reduced.

LOCAL

The buildings on the project site are located on State-owned property and would be demolished by the California Department of General Services (DGS) and subsequent development is presumed to be undertaken by the California State University Sacramento (Sacramento State), another State agency. As explained in Section 4.2 "Land Use" of this Draft EIR, under Section 4.2.1 "Local Plans, Policies, Regulations, and Laws," state agencies are not subject to local plans, policies, and zoning regulations. However, this does not apply to instances where local agencies are administering or enforcing State or federal laws. Regarding local plans, policies, and zoning regulations, in the exercise of its discretion, DGS does reference, describe, and address local plans, policies, and regulations that may be applicable to the project. This evaluation is also intended to be used by local agencies for determining, as part of their permit processes, the project's consistency with local plans, policies, and regulations.

Sacramento Metropolitan Air Quality Management District

SMAQMD adopted the *Guide to Air Quality Assessment in Sacramento County* (SMAQMD CEQA Guide) in December 2009 and has since made multiple revisions. The most recent revisions related to air pollution occurred in October 2020 and pertained to best management practices (BMPs) related to operational emissions of PM. The SMAQMD CEQA Guide provides methods to analyze air quality impacts from plans and projects, including screening criteria, thresholds of significance, calculation methods, and mitigation measures to assist lead agencies in complying with CEQA.

During updates to the SMAQMD CEQA Guide, SMAQMD updated certain CEQA thresholds for air pollutant emissions. The SMAQMD Board of Directors rescinded the 2002 concentration-based thresholds for PM_{10} and $PM_{2.5}$ and adopted the new mass-emissions PM_{10} and $PM_{2.5}$ thresholds on May 28, 2015. The TAC thresholds for stationary sources were developed as part of SMAQMD's Assembly Bill (AB) 2588 program. However, the SMAQMD Board of Directors has not yet established a threshold for mobile sources or non-permitted sources of TAC. Nevertheless, it is common practice to use SMAQMD's stationary-source TAC thresholds for land use emissions mobile sources and non-permitted sources of TACs.

Because the Sacramento Valley Air Basin (SVAB) is in nonattainment status with respect to ozone, PM_{10}, and $PM_{2.5}$, the SMAQMD CEQA Guide requires that projects implement a set of Basic Construction Emission Control Practices as BMPs regardless of the significance determination. The CEQA Guide includes guidance on quantifying construction-related emissions and measures to reduce NO_x and visible emissions from off-road diesel-powered equipment, preparation and submission of an off-road construction inventory, and payment of off-site mitigation offset fees if construction emissions exceed SMAQMD construction-threshold levels.

All projects are subject to adopted SMAQMD rules and regulations in effect at the time of construction. Specific rules relevant to the construction of future development under the project may include the following:

- Rule 201: General Permit Requirements. Any project that includes the use of equipment capable of releasing emissions to the atmosphere may be required to obtain permit(s) from SMAQMD before equipment operation. The Applicant, developer, or operator of a project that includes an emergency generator, boiler, or heater should contact SMAQMD early to determine whether a permit is required, and to begin the permit application process. Portable construction equipment (e.g., generators, compressors, pile drivers, lighting equipment) with an internal combustion engine greater than 50 horsepower must have a SMAQMD permit or CARB portable equipment registration.
- Rule 402: Nuisance. A person shall not discharge from any source whatsoever such quantities of air contaminants or other materials which cause injury, detriment, nuisance or annoyance to any considerable number of persons or the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause or have natural tendency to cause injury or damage to business or property.
- Rule 403: Fugitive Dust. The developer or contractor is required to control dust emissions from earthmoving activities or any other construction activity to prevent airborne dust from leaving the project site. Fugitive dust controls include the following:
  - Water all exposed surfaces two times daily.
  - Cover or maintain at least two feet of free board on haul trucks transporting soil, sand, or other loose material on the site.
  - Use wet power vacuum street sweepers to remove any visible trackout mud or dirt onto adjacent public roads at least once a day.
  - Limit vehicle speeds on unpaved roads to 15 miles per hour.
  - All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.
  - Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes.
  - Maintain all construction equipment in proper working condition according to manufacturer's specifications.
- Rule 902: Asbestos. The developer or contractor is required to notify SMAQMD of any regulated renovation or demolition activity. Rule 902 contains specific requirements for surveying, notification, removal, and disposal of material containing asbestos.

Toxic Air Contaminants

At the local level, air districts may adopt and enforce CARB control measures for TACs. Under SMAQMD Rule 201 ("General Permit Requirements"), Rule 202 ("New Source Review"), and Rule 207 ("Federal Operating Permit"), all sources with the potential to emit TACs are required to obtain permits from SMAQMD. Permits may be granted to these operations if they are constructed and operated in accordance with applicable regulations, including New Source Review standards and air toxics control measures. SMAQMD limits emissions and public exposure to TACs through a number of programs. SMAQMD prioritizes TAC-emitting stationary sources based on the quantity and toxicity of the TAC emissions and the proximity of the facilities to sensitive receptors. Sensitive receptors are facilities that house or attract children, the elderly, and people with illnesses or others who are especially sensitive to the effects of air pollutants. Examples include hospitals, schools, convalescent facilities, and residential areas.

Odors

Although offensive odors rarely cause any physical harm, they can be very unpleasant, leading to considerable stress among the public and often generating citizen complaints to local governments and SMAQMD. SMAQMD's Rule 402 ("Nuisance") regulates odors.

Applicable Air Quality Plans

Ozone Plan

At a public meeting held on October 26, 2023, CARB voted to approve the Sacramento Regional 70 Parts per Billion (ppb) 8-Hour Ozone Attainment and Reasonable Further Progress Plan. The Sacramento Regional 70 ppb 8-Hour Ozone Attainment and Reasonable Further Progress Plan was prepared by the five local air districts of the SFNA with the support of CARB. SFNA requested a reclassification to "severe" with an attainment deadline of August 3, 2033. The 2023 Sacramento Regional Plan for the 2015 70 ppb 8-Hour Ozone Standard addresses the CAA requirements associated with the "severe" classification and discusses how the SFNA can attain the standard by the attainment date.

PM_{10} Plans

On January 20, 1994, EPA classified Sacramento County as a "moderate" nonattainment area for the 24-hour PM_{10} NAAQS (58 FR 67334). Sacramento County attained the standard from 1998 to 2000 (67 FR 7082). After Sacramento attained the standard, SMAQMD submitted a PM_{10} Implementation/Maintenance Plan and Re-designation Request to EPA. EPA approved the first Implementation/Maintenance Plan for Sacramento County on September 26, 2013 (78 FR 59261), which covered the first 10-year maintenance period until 2023. The Second 10-year PM_{10} Maintenance Plan for Sacramento County, which shows maintenance of the 24-hour PM_{10} NAAQS from 2024 through 2033, was submitted to EPA as a revision to the California SIP on October 20, 2021, and the Final Rule became effective on April 15, 2024.

$PM_{2.5}$ Plans

The Sacramento $PM_{2.5}$ planning region, which includes Sacramento County, eastern Yolo County, the western portions of El Dorado and Placer counties, and the northeast portion of Solano County, was classified as attainment for the 2012 annual average $PM_{2.5}$ NAAQS of 12 micrograms per cubic meter ($\mu g/m^3$) and classified as nonattainment in 2009 for the 2006 24-hour $PM_{2.5}$ NAAQS of 35 $\mu g/m^3$. In 2013, the region prepared the *$PM_{2.5}$ Maintenance Plan and Redesignation Request* to address how the region attained and would continue to attain the 24-hour $PM_{2.5}$ standard.

On May 10, 2017, EPA found that the area attained the 2006 24-hour $PM_{2.5}$ NAAQS by the attainment date of December 31, 2015 (82 FR 21711). The $PM_{2.5}$ Maintenance Plan and Redesignation Request will be updated and submitted in the future based on the clean data finding made by the EPA.

In October 2016, the EPA revised the Treatment of Data Influenced by Exceptional Events rule (81 FR 68216) and determined Sacramento $PM_{2.5}$ Nonattainment Area is one of the areas in the nation subjected to mitigation plan requirements due to wildfires. In September 2018, the air districts in the nonattainment area adopted the *Wildfire Mitigation Plan for the Sacramento Federal Nonattainment Area for $PM_{2.5}$* in response to EPA's determination, with the most recent updates to the plan occurring in 2023. EPA promulgated the 9.0 $\mu g/m^3$ standard on February 7, 2024 which prompted CARB staff to submit the *$PM_{2.5}$ Area Designation Recommendations for the 2024 Annual $PM_{2.5}$ National Ambient Air Quality Standard*. As of August 2026, EPA has not assigned any attainment designations for the 2024 $PM_{2.5}$ annual standard. Also notably, no air district within the SVAB has prepared an air quality plan that addresses attainment of EPA's most recent update to the NAAQS that revised the $PM_{2.5}$ standard to 9 $\mu g/m^3$.

City of Sacramento General Plan

The City of Sacramento 2040 General Plan is the City's policy guide for future development. The 2040 General Plan establishes land uses that apply to the project area along with policies that guide development, design, and urban form. The following policies from the 2040 General Plan may be relevant to the project.

- **Policy ERC-4.1: Regional Coordination**: The City shall support air quality planning efforts led by other local, regional, and State agencies while simultaneously leveraging City authority and resources to focus on reducing air pollution burden in disadvantaged communities.

- **Policy ERC-4.2: Air Quality Awareness:** The City shall cooperate with the Sacramento Metropolitan Air Quality Management District (SMAQMD), Sacramento Area Council of Governments (SACOG), Sacramento Municipal Utility District (SMUD), and other groups to promote public access to air quality monitoring data and awareness about impacts of indoor and outdoor air quality on health and protective strategies.
- **Policy ERC-4.3: Project Design:** The City shall promote the incorporation of new technologies, materials, and design and construction techniques in private development projects that minimize air pollution, noise, excess heat, and other forms of pollution and its impacts.
- **Policy ERC-4.4: Sensitive Uses.** The City shall consult, as appropriate, with the Sacramento Metropolitan Air Quality Management District (SMAQMD) in evaluating exposure of sensitive receptors to toxic air contaminants, and will impose conditions, as appropriate, on projects to protect public health and safety.
- **Policy ERC-4.5: Construction Emissions.** The City shall ensure that construction and grading activities minimize short-term impacts to air quality by employing appropriate measures and best practices. Refer to Basic Construction Emissions Control Practices (BMPs) recommended by the Sacramento Metropolitan Air Quality Management District (SMAQMD).
- **Policy ERC-4.7: Operational Emissions.** The City shall require development projects that exceed Sacramento Metropolitan Air Quality Management District (SMAQMD) reactive organic gas (ROG) and nitrogen oxide (NOx) operational thresholds to incorporate design or operational features that reduce emissions equal to 15 percent from the level that would be produced by an unmitigated project.

Sacramento Area Council of Governments 2025 Blueprint

The Sacramento Area Council of Governments (SACOG) serves as the metropolitan planning organization (MPO) for Sacramento, Placer, El Dorado, Yuba, Sutter, and Yolo Counties, excluding the lands located in the Tahoe Basin. Under the most recent targets of Senate Bill (SB) 375 (i.e., achieve a 7 percent and 19 percent below 2005 per capita reduction in automobile emissions by 2020 and 2035, respectively), SACOG completed and adopted its 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) in November 2019 (SACOG 2019). CARB's technical evaluation of the 2020 MTP/SCS confirmed that the plan is sufficient to meet the reduction targets of SB 375 (CARB 2020). SACOG released its 2025 MTP/SCS (2025 Blueprint) in June 2025 and adopted it in November 2025. The 2025 Blueprint includes a conformity analysis which demonstrates whether the 2025 Blueprint is consistent with applicable regional attainment plans. Conformity must be demonstrated in "all nonattainment and maintenance areas for transportation-related pollutants for which the area is designated nonattainment or has a maintenance plan" (40 CFR 93.102). The results of the emissions analysis demonstrated that the 2025 Blueprint meets the emissions conformity tests based on the Transportation Conformity requirements found in the Federal Clean Air Act, Section 176(c) (42 U.S.C. 7506(c)), and Title 40, Code of Federal Regulations, Part 93, Subpart A for the Sacramento ozone, PM_{10}, and $PM_{2.5}$ areas.

4.6.2 Environmental Setting

The project site is located within the SVAB. The SVAB includes all of Butte, Colusa, Glenn, Sacramento, Shasta, Sutter, Tehama, Yolo, and Yuba counties. The ambient concentrations of air pollutant emissions are determined by the number of emissions released by the sources of air pollutants and the atmosphere's ability to transport and dilute such emissions. Natural factors that affect transport and dilution include terrain, wind, atmospheric stability, and sunlight. Therefore, the existing air quality conditions in the area are determined by several natural factors, including topography, meteorology, and climate, as well as the number of emissions released by existing air pollutant sources, as discussed separately below.

CLIMATE, METEOROLOGY, AND TOPOGRAPHY

The SVAB is a relatively flat area bordered by the north Coast Ranges to the west and the northern Sierra Nevada to the east. Air flows into the SVAB through the Carquinez Strait, the only breach in the western mountain barrier, and moves across the Sacramento River–San Joaquin River Delta (Delta) from the San Francisco Bay area.

The Mediterranean climate type of the SVAB is characterized by hot, dry summers and cool, rainy winters. During the summer, daily temperatures range from 50 degrees Fahrenheit (°F) to more than 100°F. The inland location and surrounding mountains shelter the area from much of the ocean breezes that keep the coastal regions moderate in temperature. Most precipitation in the area results from air masses that move in from the Pacific Ocean, usually from the west or northwest, during the winter months. More than half the total annual precipitation falls during the winter rainy season (November through February); the average winter temperature is a moderate 49°F. Also characteristic of SVAB winters are periods of dense and persistent low-level fog, which are most prevalent during periods between storms. The prevailing winds are moderate in speed, varying from moisture-laden breezes from the south to dry land breezes from the north (WRCC 2002).

The mountains surrounding the SVAB create a barrier to airflow, which leads to the entrapment of air pollutants when meteorological conditions are unfavorable for transport and dilution. The highest frequency of poor air movement occurs in the fall and winter when high-pressure cells are often present over the SVAB. The lack of surface wind during these periods, combined with the reduced vertical flow caused by a decline in surface heating, reduces the influx of air and leads to the concentration of air pollutants under stable meteorological conditions. Surface concentrations of air pollutant emissions are highest when these conditions occur in combination with agricultural burning activities or with temperature inversions, which hamper dispersion by creating a ceiling over the area and trapping air pollutants near the ground.

May through October is ozone season in the SVAB. This period is characterized by poor air movement in the mornings, with the arrival of the Delta breeze from the southwest in the afternoons. In addition, longer daylight hours provide a plentiful amount of sunlight to fuel photochemical reactions between ROG and NO_x, resulting in the formation of ozone. Typically, the Delta breeze transports air pollutants northward out of the SVAB; however, a phenomenon known as the Schultz Eddy prevents this from occurring during approximately half of the time from July to September. The Schultz Eddy phenomenon causes the wind to shift southward, blowing air pollutants back into the SVAB. This phenomenon exacerbates the concentration of air pollutant emissions in the area and contributes to the area violating the ambient air quality standards.

CRITERIA AIR POLLUTANTS

Concentrations of criteria air pollutants are used to indicate the quality of the ambient air. A brief description of key criteria air pollutants in the SVAB is provided below. Emission source types and health effects are summarized in Table 4.6-3. Sacramento County's attainment status for the CAAQS and NAAQS are shown in Table 4.6-2.

Table 4.6-3 Sources and Health Effects of Criteria Air Pollutants

Pollutant	Sources	Acute[1] Health Effects	Chronic[2] Health Effects
Ozone	secondary pollutant resulting from the reaction of ROG and NO_X in the presence of sunlight. ROG emissions result from incomplete combustion and evaporation of chemical solvents and fuels; NO_X results from the combustion of fuels	increased respiration and pulmonary resistance; cough, pain, shortness of breath, lung inflammation	permeability of respiratory epithelia, the possibility of permanent lung impairment
Carbon monoxide (CO)	incomplete combustion of fuels; motor vehicle exhaust	headache, dizziness, fatigue, nausea, vomiting, death	permanent heart and brain damage
Nitrogen dioxide (NO_2)	combustion devices, e.g., boilers, gas turbines, and mobile and stationary reciprocating internal combustion engines	coughing, difficulty breathing, vomiting, headache, eye irritation, chemical pneumonitis or pulmonary edema; breathing abnormalities, cough, cyanosis, chest pain, rapid heartbeat, death	chronic bronchitis, decreased lung function
Sulfur dioxide (SO_2)	coal and oil combustion, steel mills, refineries, and pulp and paper mills	irritation of the upper respiratory tract, increased asthma symptoms	insufficient evidence linking SO_2 exposure to chronic health impacts

Pollutant	Sources	Acute[1] Health Effects	Chronic[2] Health Effects
Respirable particulate matter (PM_{10}), Fine particulate matter ($PM_{2.5}$)	fugitive dust, soot, smoke, mobile and stationary sources, construction, fires, and natural windblown dust, and formation in the atmosphere by condensation and/or transformation of SO_2 and ROG	breathing and respiratory symptoms, aggravation of existing respiratory and cardiovascular diseases, premature death	alterations to the immune system, carcinogenesis
Lead	metal processing	reproductive/ developmental effects (fetuses and children)	numerous effects including neurological, endocrine, and cardiovascular effects

Notes: NO_X = oxides of nitrogen; ROG = reactive organic gases.

[1] "Acute" refers to the effects of short-term exposures to criteria air pollutants, usually at fairly high concentrations.

[2] "Chronic" refers to the effects of long-term exposures to criteria air pollutants, usually at lower, ambient concentrations.

Source: EPA 2025.

TOXIC AIR CONTAMINANTS

According to the *California Almanac of Emissions and Air Quality* (CARB 2013), health risks from TACs can largely be attributed to relatively few compounds, the most important being diesel PM exhaust from diesel engines (diesel PM) (CARB 2013: 5-2 to 5-4). Diesel PM differs from other TACs in that it is not a single substance, but rather a complex mixture of hundreds of substances. Although diesel PM is emitted by diesel-fueled internal combustion engines, the composition of the emissions varies depending on engine type, operating conditions, fuel composition, lubricating oil, and whether an emissions control system is being used. Unlike the other TACs, no ambient monitoring data are available for diesel PM because no routine measurement method currently exists. The TACs for which data are available that pose the greatest existing ambient risk in California are benzene, 1,3-butadiene, acetaldehyde, carbon tetrachloride, hexavalent chromium, para-dichlorobenzene, formaldehyde, methylene chloride, and perchloroethylene. Diesel PM poses the greatest health risk among the 10 TACs mentioned. Overall, statewide emissions of diesel PM are forecasted to decline by 71 percent between 2000 and 2035 (CARB 2013: 3-8), and this trend is expected to continue post-2035. The project site is not located within 1,000 feet of any stationary or major TAC-emitting roadways.

ODORS

Odors are generally regarded as an annoyance rather than a health hazard. However, manifestations of a person's reaction to foul odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache).

The ability to detect odors varies considerably among the population and overall is quite subjective. Some individuals can detect very small quantities of specific substances; others may not have the same sensitivity but may be sensitive to the odors of other substances. In addition, people may have different reactions to the same odor; an odor that is offensive to one person may be perfectly acceptable to another (e.g., fast food restaurant). It is also important to note that an unfamiliar odor is more easily detected and is more likely to cause complaints than a familiar one. This is due to the phenomenon known as odor fatigue, in which a person can become desensitized to almost any odor, and recognition only occurs with an increase in intensity.

Odor sources of concern include wastewater treatment plants, sanitary landfills, composting facilities, recycling facilities, petroleum refineries, chemical manufacturing plants, painting operations, rendering plants, food packaging plants, and cannabis (SMAQMD 2022). There are no land uses typically associated with nuisance odors located within proximity of the project site.

SENSITIVE RECEPTORS

Sensitive receptors are generally considered to include those land uses where exposure to pollutants could result in health-related risks to sensitive individuals, such as children or the elderly. Residential dwellings, schools, hospitals, playgrounds, and similar facilities are of primary concern because of the presence of individuals particularly sensitive to pollutants and/or the potential for increased and prolonged exposure of individuals to pollutants. Sensitive receptors near the project site include multifamily residences approximately 550 feet to the southwest and a preschool approximately 200 feet south of the project site.

4.6.3 Environmental Impacts and Mitigation Measures

METHODOLOGY

Regional and local criteria air pollutant emissions and associated impacts, as well as impacts from TACs, CO concentrations, and odors were assessed in accordance with SMAQMD-recommended methodologies. The project's emissions are compared to SMAQMD-adopted thresholds.

Demolition, construction and operational emissions of criteria air pollutants and precursors were calculated using the California Emissions Estimator Model (CalEEMod) Version 2022.1.1.45 computer program, as recommended by SMAQMD. Demolition and construction modeling was based on project-specific information (project schedule, equipment usage, demolition and hauling quantities and trips, etc.) where available, reasonable assumptions based on typical construction activities, and default values in CalEEMod that are based on the project's location and land use types.

The project would require demolition of 729,700 total gross square feet (GSF) of building resulting in approximately 3,051 truck trips leaving the project site to haul away demolition waste (see Chapter 3, "Project Description). There would be up to approximately 55 workers onsite during peak activity periods when both abatement and demolition are occurring simultaneously. It is assumed that this would result in 110 daily worker trips per day.

It is assumed that construction of future developments would begin in 2030 and be completed by 2040. The gap between the end of building demolition and the beginning of new building construction is to allow for CEQA documentation for the new development to be completed. For the purposes of this analysis it is assumed that construction would include development of approximately 3,630,000 GSF of building space.

Impacts related to odors were assessed qualitatively, based on proposed demolition and construction activities, equipment types and duration of use, implementation schedule, and distance to nearby sensitive receptors. To evaluate an odor impact, SMAQMD recommends the lead agency provide the buffer distance and a description of the land features and topography in the buffer zone that separates nearby sensitive receptors and the odor source.

Operational modeling was estimated for the first year of full project buildout (2040) to estimate emissions from the following sources: area sources (e.g. landscape maintenance equipment), energy usage (e.g., natural gas consumption), and mobile sources. Modeling was based on project-specific information (vehicle miles traveled [VMT], future land uses and sf) where available and CalEEMod defaults values that are based on the project's location and land use types. The project would develop approximately 3,630,000 building GSF with land uses including the School of Public Affairs which includes an innovation center and additional academic or cultural uses, student housing, a conference and event center, a hotel, an indoor performing arts and music venue, market rate housing apartments, retail space, and commercial office space. Fehr & Peers conducted a traffic study and determined that implementation of the project would generate approximately 267,693 daily VMT (Fehr & Peers 2026).

Given the proximity of existing sensitive receptors (nearby preschool and multifamily residential units), the level of health risk from exposure to construction-related activities were evaluated quantitively and operational-related exposure was evaluated qualitatively based on guidance from the California Office of Environmental Health Hazard Assessment's *The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*. TAC exposure from construction activities were assessed based on the distance to the nearest receptors, equipment types

and usage, duration, and onsite truck travel. Operational TAC exposure was assessed based on the new stationary sources that would result from implementation of the project and distance the nearest sensitive receptor.

A health risk assessment (HRA) was prepared evaluating the potential health risks from truck trips generated by demolition of the three existing buildings. A summary discussion of the HRA approach is included below, and additional details are provided in Appendix B.

Modeling Approach

Dispersion modeling was conducted using CARB's approved American Meteorological Society/Environmental Protection Agency Regulatory Model Improvement Committee modeling system (AERMOD) Version 24142 using site-specific parameters (e.g., local terrain, meteorological data).

To determine the health risks and pollutant concentrations at specific locations (i.e., receptors), air dispersion modeling was conducted to generate the ground-level pollutant concentrations prior to risk calculations, using unit emissions rates (i.e., 1 gram per second) for modeled sources and source groups. This approach is used so that the resulting ground-level concentrations (GLCs) can be easily scaled for various scenarios (e.g., default model runs, reduced emissions scenario) without running AERMOD multiple times. The GLCs from the AERMOD run at each receptor location were multiplied by TAC emission rates to obtain the actual GLCs for TACs.

Meteorological Data

Sacramento International Airport meteorological station (Surface Station ID: 93225) is located approximately 9.5 miles northwest of the project site and has similar geography and meteorological conditions. The most recently available preprocessed data (2014–2018 data) were downloaded from the SMAQMD website. The most recent three years of data were used for dispersion modeling. The model used time-averaged atmospheric transport to estimate pollutant dispersion based on local winds. Concentrations were averaged over the period 2016-2018 for chronic health risk assessment and over 1 hour for acute risk assessment. The prevailing wind direction measured is south-southeast to north-northwest.

Receptor Grid

Receptors are specific points within the project area where pollutant concentrations and potential health risks are assessed. A uniform grid was configured in AERMOD for the project following SMAQMD guidelines, with spacing of 10 meters, extending out 400 meters, and a flagpole receptor height of 1.5 meters. There are a total of 6,275 near-site receptors, among which 1,018 are residential receptors, 1,168 are receptors at parks, 154 are school and daycare receptors, and 3,935 are worker receptors. Figure 1 in Appendix B shows all receptors along with the project site and truck routes.

Demolition-Generated Toxic Air Contaminants

Demolition-generated TACs emissions are primarily composed of diesel particulate matter (DPM) from diesel-powered off-road (construction) equipment, truck idling within the project boundary, and truck emissions associated with material deliveries and hauling both within the project site and along the truck route.

On-site equipment exhaust DPM was modeled as adjacent volume sources with 15-meter sides and a release height of 5 meters. Onsite water trucks and haul trucks were both modeled as line-volume sources with adjacent configurations. Trucks were modeled with a 6.8-meter plume height, an 8-meter plume width, and a 3.4-meter release height, per SMAQMD guidance. Two haul routes were modeled, one stopping at the Interstate 5 (I-5) freeway entrance at L Street providing access to I-5 north, and one stopping at the I-5 freeway entrance at P Street providing access to I-5 south. Figure 1 in Appendix B shows the haul routes and specific model assumptions and inputs for these calculations can also be found in Appendix B.

THRESHOLDS OF SIGNIFICANCE

Per Appendix G of the State CEQA Guidelines and SMAQMD recommendations, air quality and its associated health impacts are considered significant if the Capitol Mall Office Buildings Demolition Project would do any of the following:

- conflict with the Sacramento Regional 70 ppb 8-Hour Ozone Attainment and Reasonable Further Progress Plan or the 2025 Blueprint;
- cause construction-generated criteria air pollutant or precursor emissions to exceed the SMAQMD-recommended thresholds of 85 pounds per day (lb/day) for NO_X, 80 lb/day and 14.6 tons per year (tpy) for PM_{10}, and 82 lb/day and 15 tpy for $PM_{2.5}$. In addition, all SMAQMD-recommended BMPs shall be implemented to minimize emissions of PM_{10} and $PM_{2.5}$; otherwise, the threshold for both PM_{10} and $PM_{2.5}$ is 0 lb/day;
- result in a net increase in long-term operational criteria air pollutant or precursor emissions that exceed the SMAQMD-recommended thresholds of 65 lb/day for ROG and NO_X, 80 lb/day and 14.6 tpy for PM_{10}, and 82 lb/day and 15 tpy for $PM_{2.5}$. In addition, all SMAQMD-recommended Operational BMPs for PM Emissions from Land Use Development Projects shall be implemented to minimize emissions of PM_{10} and $PM_{2.5}$; otherwise, the threshold for both PM_{10} and $PM_{2.5}$ is 0 lb/day;
- result in short-term construction and long-term operational local mobile-source CO emissions that would violate or contribute substantially to concentrations that exceed the 1-hour CAAQS of 20 parts per million (ppm) or the 8-hour CAAQS of 9 ppm;
- expose any off-site sensitive receptor to a substantial incremental increase in TACs emissions that exceed 10 in 1 million for carcinogenic risk (i.e., the risk of contracting cancer) and/or a noncarcinogenic hazard index of 1.0 or greater; or
- result in other emissions, such as those leading to odors, adversely affecting a substantial number of people.

ISSUES NOT DISCUSSED FURTHER

Localized emissions of mobile-source CO are not included in this analysis. The SVAB has been in attainment for CO for several years, and this pollutant is less of a concern because operational activities are unlikely to generate substantial CO emissions. As discussed in SMAQMD's CEQA Guide, CO emissions are "predominately generated in the form of mobile-source exhaust from vehicle trips. These vehicle trips occur throughout a paved network of roads, and therefore, associated exhaust emissions of [CO] are not generated in a single location where high concentrations could be formed" (SMAQMD 2020: 4-7). SMAQMD's current guidance does not provide a threshold for mobile-source CO emissions. However, the Bay Area Air Quality Management District or Bay Area Air District (BAAD) endorses a numerical threshold to evaluate potential project-related CO hotspots. The use of the BAAD's thresholds in this analysis is appropriate because CO hotspots are an issue of localized concern and are less affected by location-specific factors such as meteorological patterns and landscapes than mass emissions of other air pollutants such as ROG, NO_X, and PM. Thus, the conditions which lead to CO hotpots are similar regardless of geographical location. In addition, the Bay Area experiences a far greater amount of daily and annual VMT and, therefore, mobile-source air pollution, than the greater Sacramento Area. Thus, the use of the Bay Area Air District's CO hotspot threshold in this analysis is inherently conservative.

The BAAD's CEQA Guidelines' screening threshold states that project-generated traffic that would increase traffic volumes at affected intersections to more than 44,000 vehicles per hour would potentially result in a CO impact and would therefore require further analysis. Considering the project would result in a maximum of 21,678 average daily trips on a single roadway, as identified in the traffic analysis prepared for the project, it is highly unlikely that the number of vehicles traveling through a single intersection within a one-hour period would exceed 44,000 vehicles per hour. In addition, SMAQMD guidance identifies that pollutants such as CO are of less concern because operational activities are not likely to generate substantial quantities of the pollutant and the SVAB has been in attainment for CO for multiple years (SMAQMD 2020). Thus, CO emissions are not discussed further in this analysis.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 4.6-1: Conflict with or Obstruct Implementation of an Applicable Air Quality Plan

The project would exceed SMAQMD's numerical thresholds, which are designed to attain and maintain the NAAQS. This would conflict with SMAQMD's efforts to attain and maintain the NAAQS and CAAQS through its air quality plans and this impact would be **significant**.

Applicable plans considered in this analysis are the Sacramento Regional 70 ppb 8-Hour Ozone Attainment and Reasonable Further Progress Plan, the Second 10-year PM_{10} Maintenance Plan, the $PM_{2.5}$ Maintenance Plan and Redesignation Request, and the 2025 Blueprint. The inventories used to develop these plans are based primarily on projected population and employment growth (and regional changes in VMT associated with both of these metrics) for the SVAB. Demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) were developed by SACOG for the 2025 Blueprint based on general plans for cities and counties in the SVAB (including the 2040 General Plan). As stated in Section 4.6.1, "Regulatory Setting," the 2025 Blueprint meets the emissions conformity requirements for the Sacramento ozone, PM_{10}, and $PM_{2.5}$ areas.

The growth projections used for the 2040 General Plan assume that growth in population, vehicle use (i.e., VMT), and other source categories would occur at rates that are consistent with the rates used to develop the SMAQMD's attainment plans. In other words, the amount of growth predicted for the 2040 General Plan is accommodated by SMAQMD's plans (e.g., the 2025 Blueprint and the Sacramento Regional 70 ppb 8-Hour Ozone Attainment and Reasonable Further Progress Plan). As identified in Section 4.2, "Land Use and Planning," future development would be generally consistent with plans such as the 2025 Blueprint and the 2040 General Plan by supporting infill development, intensifying uses on underutilized sites near transit, increased opportunities for pedestrian and bicycle use, and locating housing closer to jobs. As explained in Section 4.4, "Transportation and Circulation," due to the project's proximity to major transit stops, the type and mix of proposed land uses, and the inclusion of residential and local-serving commercial retail uses, the project would maintain the low-VMT characteristics of the area.

However, as concluded under Impact 4.6-2, below, demolition activities as well as construction activity associated with future development included in the project is anticipated to generate emissions in exceedance of the established maximum daily and annual thresholds for PM_{10}, and $PM_{2.5}$ without implementation of SMAQMD's BMPs. In addition, operation of future development would generate emissions above SMAQMD's recommended thresholds for operations-related ROG and PM_{10}. Because these thresholds are intended to identify emission levels that could hinder attainment and maintenance of the NAAQS and are based on standards established to protect public health, exceedance of the SMAQMD thresholds indicates the potential for adverse air quality and health effects on nearby sensitive receptors. Accordingly, the project would conflict with the goals of SMAQMD's air quality plans, and this impact would be **significant**.

Mitigation Measures

Mitigation Measure 4.6-1: Implement SMAQMD's Basic Construction Emission Control Practices

DGS, during the abatement and demolition process, and the entity implementing future development (e.g., Sacramento State) shall ensure that demolition/construction and grading activities minimize short-term impacts to air quality by employing the following Basic Construction Emissions Control Practices (BMPs) recommended by the SMAQMD. As a contract condition, demolition/construction contractors shall implement the following BMPs included in SMAQMD's Basic Construction Emission Control Practices:

- water all exposed surfaces two times daily. Exposed surfaces include, but are not limited to soil piles, graded areas, unpaved parking areas, staging areas, and access roads;
- cover or maintain at least two feet of freeboard space on haul trucks transporting soil, sand, or other loose material on the site. Any haul trucks that would be traveling along freeways or major roadways would be covered;

- use wet power vacuum street sweepers to remove any visible trackout mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited;
- limit vehicle speeds on unpaved surfaces to 15 miles per hour (mph);
- minimize the exposure of bare soil by completing construction of all roadways, driveways, sidewalks, parking lots as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used;
- minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes [required by California Code of Regulations, Title 13, sections 2449(d)(3) and 2485]. Provide clear signage that posts this requirement for workers at the entrances to the site; and
- maintain all construction equipment is in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determined to be running in proper condition before it is operated.

Significance after Mitigation

Regarding demolition and construction emissions, with implementation of SMAQMD's fugitive dust BMPs, the emissions thresholds for PM_{10} and $PM_{2.5}$ would be 80 lb/day or 14.6 tpy of PM_{10} and 82 lb/day or 15 tpy of $PM_{2.5}$. The dust control measures outlined in Mitigation Measure 4.6-1 would reduce impacts related to fugitive dust emissions by reducing dust generated by vehicle movement through the watering of exposed surfaces and limiting vehicle speeds on unpaved surfaces, reducing the potential for dust to escape hauling trucks by placing covers over the truck beds when on major roadways, wet-vacuuming mud/dirt tracked onto public roadways, and completing high-movement areas (e.g. roadways, sidewalk, and parking lots) as soon as possible to reduce the amount of unpaved surfaces that could result in dust generation. As shown in Tables 4.6-4 and 4.6-5, with implementation of SMAQMD's BMPs identified in Mitigation Measure 4.6-1, the PM_{10} and $PM_{2.5}$ emissions associated with demolition and construction activities would not exceed applicable thresholds.

Regarding ROG emissions, as discussed below in Impact 4.6-2, there is no mitigation that can be implemented to reliably reduce the use of consumer products to minimize ROG emissions below a significant level. Thus, operational emissions would continue to exceed SMAQMD's thresholds and conflict with SMAQMD's efforts to attain and maintain the NAAQS and CAAQS. This impact would be **significant and unavoidable** even after implementation of mitigation.

Impact 4.6-2: Result in a Cumulatively Considerable Net Increase of Any Criteria Pollutant for Which the Project Region is Non-attainment Under an Applicable Federal or State Ambient Air Quality Standard

Demolition and construction activities would result in emissions that would exceed SMAQMD thresholds for PM_{10} and $PM_{2.5}$ (i.e., 0 lb/day and 0 tpy) because SMAQMD's construction BMPs are not included as part of the project. In addition, operation of future development would generate operational emissions of ROG, NO_X, and PM_{10} that would exceed SMAQMD thresholds. Therefore, this impact would be **significant**.

Demolition

Demolition activities would generate emissions of ROG, NO_X, PM_{10}, and $PM_{2.5}$ associated with the use of off-road equipment, hauling trips, and worker commute trips. Fugitive dust emissions of PM_{10} and $PM_{2.5}$ would be associated primarily with vehicle movement and vary as a function of soil silt content, soil moisture, wind speed, and acreage of disturbance. PM_{10} and $PM_{2.5}$ are also contained in exhaust from off-road equipment and on-road vehicles. Emissions of ozone precursors, ROG and NO_X, would be associated primarily with construction equipment and on-road mobile exhaust.

As described above under "Methodology," building demolition would is assumed to begin in 2027 and would last 18 months. The modelling calculated abatement and demolition occurring during the entirety of 2027, providing a complete annual emissions estimate. For specific assumptions and modeling inputs, refer to Appendix C. Table 4.6-4 summarizes the modeled maximum daily (ROG, NO_x, PM) and annual (PM) emissions from demolition activities.

Table 4.6-4 Annual Demolition Emissions

Year	ROG (lb/day) Emissions	NO_X (lb/day) Emissions	PM_{10} (lb/day) Emissions	PM_{10} (tpy) Emissions	$PM_{2.5}$ (lb/day) Emissions	$PM_{2.5}$ (tpy) Emissions
2027	1	22	8	<1	2	<1
SMAQMD Thresholds of Significance without BMPs[1]	None	85	0	0	0	0
Threshold Exceeded?	N/A	No	Yes	Yes	Yes	Yes
SMAQMD Thresholds of Significance with BMPs[2]	None	85	80	14.6	82	15
Threshold Exceeded?	N/A	No	No	No	No	No

Notes: ROG = reactive organic gas; NO_X = oxides of nitrogen; PM_{10} = respirable particulate matter; $PM_{2.5}$ = fine particulate matter; lb/day = pounds per day; SMAQMD = Sacramento Air Quality Management District; tpy = tons per year; BMPs = best management practices.

[1] Without implementation of fugitive dust reducing BMPs.

[2] With implementation of fugitive dust reducing BMPs.

Source: Modeling conducted by Ascent in 2026.

According to SMAQMD guidance, projects that do not implement SMAQMD's recommended fugitive dust BMPs by design must meet a zero threshold for peak daily and annual emissions for PM_{10} and $PM_{2.5}$. With implementation of SMAQMD's BMPs, the SMAQMD's peak daily and annual thresholds increase to 80 lb/day or 14.6 tpy for PM_{10} and 82 lb/day or 15 tpy for $PM_{2.5}$.

As shown in Table 4.6-4, demolition activities are anticipated to generate emissions in exceedance of the established maximum daily and annual thresholds (0 lb/day) for PM_{10}, and $PM_{2.5}$ without implementation of SMAQMD's BMPs. This would be a significant impact.

Future Development

Construction

Construction activities would generate emissions of ROG, NO_X, PM_{10}, and $PM_{2.5}$ associated with the use of off-road equipment, hauling trips, the application of architectural coatings, and worker commute trips. Fugitive dust emissions of PM_{10} and $PM_{2.5}$ would be associated primarily with vehicle movement.

Construction of future development would begin in 2030 and be completed by the end of 2039. For specific construction assumptions and modeling inputs, refer to Appendix C. Table 4.6-5 summarizes the modeled maximum daily (ROG, NO_x, PM) and annual (PM) emissions from construction activities related to buildout of the project.

As stated above, implementation of SMAQMD's BMPs allows for the use of SMAQMD's non-zero thresholds (i.e., 80 lb/day or 14.6 tpy for PM_{10} and 82 lb/day or 15 tpy for $PM_{2.5}$). The 0 lb/day threshold for peak daily and annual emissions for PM_{10} and $PM_{2.5}$ applies to projects that do not implement SMAQMD's recommended fugitive dust BMPs by design.

As shown in Table 4.6-5, construction activity associated with implementation of the project is anticipated to generate emissions in exceedance of the established maximum daily and annual thresholds (0 per day) for PM_{10}, and $PM_{2.5}$ without implementation of SMAQMD's BMPs. This would be a significant impact.

Table 4.6-5 Annual Construction Emissions per Phase (2030-2039)

Year	ROG (lb/day) Emissions	NO_X (lb/day) Emissions	PM_{10} (lb/day) Emissions	PM_{10} (tpy) Emissions	$PM_{2.5}$ (lb/day) Emissions	$PM_{2.5}$ (tpy) Emissions
2030	3	25	9	1	5	<1
2031	2	16	5	1	1	<1
2032	2	15	5	1	1	<1
2033	2	14	5	1	1	<1
2034	23	15	8	1	2	<1
2035	23	14	8	1	2	<1
2036	23	14	8	1	2	<1
2037	23	13	8	1	2	<1
2038	23	13	8	1	2	<1
2039	21	7	3	<1	1	<1
Maximum	**23**	**25**	**9**	**1**	**5**	**<1**
SMAQMD Thresholds of Significance without BMPs[1]	**None**	**85**	**0**	**0**	**0**	**0**
Threshold Exceeded?	**N/A**	**No**	**Yes**	**Yes**	**Yes**	**Yes**
SMAQMD Thresholds of Significance with BMPs[2]	**None**	**85**	**80**	**14.6**	**82**	**15**
Threshold Exceeded?	**N/A**	**No**	**No**	**No**	**No**	**No**

Notes: ROG = reactive organic gas; NO_X = oxides of nitrogen; PM_{10} = respirable particulate matter; $PM_{2.5}$ = fine particulate matter; lb/day = pounds per day; SMAQMD = Sacramento Air Quality Management District; tpy = tons per year; BMPs = best management practices.

[1] Without implementation of fugitive dust reducing BMPs.

[2] With implementation of fugitive dust reducing BMPs.

Source: Modeling conducted by Ascent in 2026.

Operations

The first year of full project operation (i.e., the first full year following the cessation of construction activities) is assumed to be 2040. Operational emissions modeling only accounted for the incremental increase in emissions that would result from development under the project compared to baseline conditions, pursuant to the requirements of CEQA.

Development of the project would result in the generation of long-term operational emissions of ROG, NO_X, PM_{10}, and $PM_{2.5}$ from mobile, stationary, and area-wide sources. Mobile source emissions of criteria pollutants and precursors would result from vehicle trips generated by residents, employees, and other associated vehicle trips (e.g., delivery of supplies and maintenance vehicles). Stationary and area-wide sources would include the use of landscaping equipment and other small equipment, the periodic application of architectural coatings, energy consumption associated with project buildings, and ROG from the use of consumer products.

Table 4.6-6 summarizes the maximum daily operation-related emissions of criteria air pollutants during full project buildout.

As shown in Table 4.6-6, the project would result in operational emissions of 169 lb/day of ROG, which would exceed the SMAQMD threshold of 65 lb/day. NO_x emissions would be 63 lb/day and would be below the SMAQMD threshold of 65 lb/day. In addition, operation of the project would result in emissions of 191 lb/day and 34 tpy of PM_{10} that would exceed both the daily and annual SMAQMD standards (80lb/day and 14.6 tpy, respectively). As a requirement for the non-zero SMAQMD PM thresholds, all development under the project must adhere to the mandatory requirements of the California Green Building Code (CALGreen). $PM_{2.5}$ emissions would be below applicable thresholds.

Table 4.6-6 Criteria Air Pollutant and Precursor Emissions Associated with Project Operations (2040)

Source	ROG (lb/day)	NO_X (lb/day)	PM_{10} (lb/day)	PM_{10} (tpy)	$PM_{2.5}$ (lb/day)	$PM_{2.5}$ (tpy)
Mobile	63	53	190	34	49	9
Area	105	1	<1	<1	<1	<1
Energy	<1	8	1	<1	1	<1
Total	**169**	**63**	**191**	**34**	**50**	**9**
SMAQMD Thresholds of Significance without BMPs[1]	65	65	0	0	0	0
Threshold Exceeded?	**Yes**	**No**	**Yes**	**Yes**	**Yes**	**Yes**
SMAQMD Thresholds of Significance with BMPs[2]	**65**	**65**	**80**	**14.6**	**82**	**15**
Threshold Exceeded?	**Yes**	**No**	**Yes**	**Yes**	**No**	**No**

Notes: ROG = reactive organic gas; NOX = oxides of nitrogen; CO = carbon monoxide; PM_{10} = respirable particulate matter; $PM_{2.5}$ = fine particulate matter; lb/day = pounds per day; SMAQMD = Sacramento Metropolitan Air Quality Management District.

[1] Without implementation of operational PM reducing BMPs.

[2] With implementation of operational PM reducing BMPs.

Source: Modeled by Ascent in 2026.

The project's operational ROG emissions can be largely attributed to the use of consumer products (e.g., aerosols, cleaning products, hairspray) (included in the "Area" source in Table 4.6-6). The use of consumer products and subsequent emissions are dictated by human behaviors which cannot reliably be altered through mitigation. Therefore, mitigation to reduce area ROG emissions is not proposed because there is no mitigation that would reliably dissuade the use of consumer products to reduce ROG emissions below a significant level.

Regarding operational NO_X and PM_{10}, the project would result in additional VMT associated with new residential and commuting trips. These trips would generate PM_{10} emissions from the combustion of both gasoline and diesel fuels; however, the majority of NO_X and PM_{10} emissions would occur from diesel fuel combustion (see Appendix C). As stated above and shown in Table 4.6-6, emissions from these additional trips would exceed SMAQMD thresholds for daily and annual PM_{10} emissions.

Summary

SMAQMD's project thresholds are intended to maintain or achieve attainment of the CAAQS and NAAQS within the SVAB. Projects that exceed SMAQMD's thresholds would contribute to regional emission and could exacerbate existing air quality problems or interfere with the region's ability to attain and maintain these health-based standards (SMAQMD 2020). As shown above in Tables 4.6-4 and 4.6-5, demolition and construction activity associated with the project are anticipated to generate emissions in exceedance of the established maximum daily and annual thresholds for PM_{10}, and $PM_{2.5}$ without implementation of SMAQMD's BMPs (i.e., 0 lb/day and 0 tpy). In addition, as shown in Table 4.6-6, buildout of the project would result in operational emissions above SMAQMD's recommended thresholds for ROG and PM_{10}. Therefore, the project could contribute to a violation of an air quality standard or contribute substantially to an existing or projected air quality violation. Because SMAQMD's thresholds are based on attainment and maintenance of ambient air quality standards established to protect public health, exceedance of these thresholds indicates the potential for adverse health effects on nearby receptors. Therefore, this impact would be **significant**.

Mitigation Measures

Implement Mitigation Measure 4.6-1.

Mitigation Measure 4.6-2a: Reduce Emissions from Landscaping

The use of gasoline-powered landscape equipment shall be prohibited during operation of future development on the project site. This shall be enforced by the entity implementing the future development (e.g., Sacramento State) with verification by SMAQMD.

Mitigation Measure 4.6-2b: Reduce Emissions from Architectural Coatings

During project operation, to reduce impacts from operations-related ROG emissions leading to ozone formation, all operational architectural coating activities shall use low-VOC (i.e., ROG) coatings beyond SMAQMD's mandatory requirement (i.e., Rule 1113, "Architectural Coatings"). This shall be enforced by the entity implementing the future development (e.g., Sacramento State) with verification by SMAQMD.

Significance after Mitigation

Regarding demolition and construction emissions, with implementation of SMAQMD's fugitive dust BMPs as part of Mitigation Measure 4.6-1, the emissions thresholds for PM_{10} and $PM_{2.5}$ would be 80 lb/day or 14.6 tpy of PM_{10} and 82 lb/day or 15 tpy of $PM_{2.5}$. The dust control measures outlined in Mitigation Measure 4.6-1 would reduce impacts related to fugitive dust emissions by reducing dust generated by vehicle movement through the watering of exposed surfaces and limiting vehicle speeds on unpaved roads, reducing the potential for dust to escape haul trucks by placing covers over the truck beds when on major roadways, wet-vacuuming mud/dirt tracked onto public roadways, and completing high-movement areas (e.g. roadways, sidewalk, and parking lots) as soon as possible to reduce the amount of unpaved surfaces that could result in dust generation. As shown in Tables 4.6-4 and 4.6-5, with implementation of SMAQMD's BMPs identified in Mitigation Measure 4.6-1, the PM_{10} and $PM_{2.5}$ emissions associated with demolition and construction activities would not exceed applicable thresholds.

Regarding operational emissions, General Plan Policy ERC-4.7, "Operational Emissions," states that the City shall require development projects that exceed SMAQMD's ROG and NO_X operational thresholds to incorporate design or operational features that reduce emissions equal to 15 percent from the level that would be produced by an unmitigated project. Table 4.6-7 summarizes the project's operational emissions if this 15 percent reduction were implemented.

Table 4.6-7 Mitigated Criteria Air Pollutant and Precursor Emissions Associated with Project Operations (2040)[1]

Source	ROG (lb/day)	NO_X (lb/day)	PM_{10} (lb/day)	PM_{10} (tpy)	$PM_{2.5}$ (lb/day)	$PM_{2.5}$ (tpy)
Mobile	53	45	190	34	49	9
Area	90	1	<1	<1	<1	<1
Energy	<1	7	1	<1	1	<1
Total	**144**	**53**	**191**	**34**	**50**	**9**
SMAQMD Thresholds of Significance[1]	**65**	**65**	**80**	**14.6**	**82**	**15**
Threshold Exceeded?	**Yes**	**No**	**Yes**	**Yes**	**No**	**No**

Notes: ROG = reactive organic gas; NOx = oxides of nitrogen; CO = carbon monoxide; PM_{10} = respirable particulate matter; $PM_{2.5}$ = fine particulate matter; lb/day = pounds per day; SMAQMD = Sacramento Metropolitan Air Quality Management District.

[1] ROG and NOx emissions reduced by 15 percent from unmitigated scenario in accordance with General Plan Policy ERC-4.7.

[2] With implementation of operational PM reducing BMPs.

Source: Modeled by Ascent in 2026.

As shown in Table 4.6-7, the project would continue to exceed SMAQMD's operational thresholds following the application of a 15 percent reduction to ROG and NO_X emissions. The specific design features that would be implemented to achieve this 15 percent reduction would be decided as part of the project design process. Potential design features to reduce operational ROG and NO_x emissions could include, but are not limited to, implementation of a TDM plan to reduce VMT and features to support walking and biking such as additional bike storage or electric bike charging options.

Mitigation Measures 4.6-2a and 4.6-2b would collectively reduce area-source emissions generated by landscaping and architectural coatings by prohibiting the use of gasoline-powered landscape equipment during operation and by requiring that all operational architectural coating activities use low-VOC (i.e., ROG) coatings, respectively. However, as discussed above, there is no mitigation that can be implemented to reliably reduce the use of consumer products, which also contribute toward areawide emissions, and it cannot be guaranteed that implementation of Mitigation Measures 4.6-2a and 4.6-2b would be sufficient to reduce area source ROG emissions below a significant level. Thus, this impact would be **significant and unavoidable** even after implementation of mitigation.

Impact 4.6-3: Expose Sensitive Receptors to Substantial Pollutant Concentrations

Based on the HRA prepared to estimate potential health risks that could occur during implementation of the project, demolition activities would not generate substantial pollutant concentrations that would exceed SMAQMD's threshold of 10 in 1 million for carcinogenic risk or a noncarcinogenic hazard index of 1.0 or greater. Using this numerical threshold, the project would not generate substantial emissions of TACs, causing an adverse health impact from TAC exposure. Future development is not proposed to include any stationary sources of TACs and would, thus, not have the potential to expose receptors to substantial concentrations of TACs during operation. This impact would be **less than significant**.

Demolition

As identified under "Thresholds of Significance," above, SMAQMD's quantitative threshold of significance for carcinogenic risk exposure is 10 in 1 million. SMAQMD developed this threshold in consideration of dosage, risk exposure, background risk levels, and guidance established by AB 2588, the Air Toxics "Hot Spots" Information and Assessment Act.

AB 2588 directs each air district to establish a prioritization score threshold for stationary sources of TACs. To assist the districts with this requirement, the California Air Pollution Control Officers Association Toxics Committee, in cooperation with the Office of Environmental Health Hazard Assessment (OEHHA) and CARB, developed *The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments* (CAPCOA 2015). The purpose of the guideline is to provide districts with suggested procedures for conducting health risk assessments.

The dose to which receptors are exposed is the primary factor used to determine health risk (i.e., potential exposure to TAC emission levels that exceed applicable standards). Dose is a function of the concentration of a substance or substances in the environment and the duration of exposure to the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for any exposed receptor. Therefore, the risks estimated for an exposed individual are higher if a fixed exposure occurs over a longer period. According to guidance from OEHHA, a 30-year exposure duration is used for estimating cancer risk at residential land uses (OEHHA 2015). Abatement and demolition activities are anticipated to take place over an 18-month timeframe for the project.

Abatement and demolition related activities would result in temporary, short-term emissions of diesel PM from the exhaust of off-road heavy-duty diesel equipment and haul trucks. The HRA prepared for this project focuses on emissions of TACs that would be generated during the abatement and demolition phase because this phase of construction would involve more intense on- and off-road vehicle usage, hauling, and dust-generating activities (e.g., building demolition, materials movement) relative to other proposed project phases. The cancer risk and chronic health hazard index results presented in Table 4.6-8 and the emissions estimates that inform them (see Appendix B) are considered the maximum anticipated health effects and emissions that would be generated during the project's abatement and demolition phase, with health risks and TAC emissions occurring during other phases of construction falling below these estimates.

As shown in Table 4.6-8, the greatest anticipated lifetime cancer risk for any maximally exposed individual receptor would be 5.06 in one million which is below SMAQMD's significance threshold of 10 in one million, and the chronic health hazard index at the maximally exposed receptor would be less than 0.1, which is below SMAQMD's threshold of a noncarcinogenic hazard index of 1.0 or greater.

Table 4.6-8 Demolition Cancer and Non-Cancer Risks

Cancer Risk	Maximum Exposed Individual Receptor	
	Cancer Risk (1/Million)	Chronic Health Hazard Index
Residential	5.06	<0.1
Parks	0.91	<0.1
Schools	0.22	<0.1
Workers	2.12	<0.1

Source: Modeled by Ascent in 2026.

Future Development

As stated above in the analysis of abatement and demolition, this project phase is anticipated to generate the highest risk from TAC generation, yet exposure and risks as evaluated in the HRA would still be below identified thresholds. Therefore, risks from TAC generation and exposure would be less from construction of future development. Nonetheless, the following additional analysis is provided.

Construction-related activities would result in temporary, intermittent emissions of diesel PM from the exhaust of off-road, heavy-duty diesel equipment used for site preparation (e.g., clearing, grading); paving; on-road truck travel; and other miscellaneous activities. On-road diesel-powered haul trucks traveling to and from the project site to deliver materials and equipment are less of a concern because they would not remain in the project area for long periods of time and hauling activities would stop between phases of construction. Based on the construction-related emissions modeling conducted, maximum daily emissions of exhaust PM_{10} would be less than 1 lb/day during hypothetical peak construction conditions (see Appendix B for detailed model outputs). These peak emissions would not occur on a daily basis. In addition, only a portion of the project site, and therefore construction activities, are located in proximity to sensitive receptors. Project construction would not result in a health hazard from emissions of TACs.

Future development of the project site could include a mix of academic, residential, hospitality, commercial, entertainment, office, parking, and related uses. Future development is not proposed to include any stationary sources of TACs and would, thus, not have the potential to expose receptors to substantial concentrations of TACs during operation.

Summary

The project would not generate demolition or construction-related emissions that would cause SMAQMD's threshold of significance for cancer risk or the health hazard index to be exceeded. Future development is not proposed to include any stationary sources of TACs and would, thus, not have the potential to expose receptors to substantial TAC concentrations. For these reasons, this impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.6-4: Create Objectionable Odors Affecting a Substantial Number of People

The project would introduce construction-related odor sources into the area (e.g., temporary diesel exhaust emissions during demolition and construction). However, these odor sources would be temporary, intermittent, and dissipate rapidly from the source. The project would not introduce new objectionable odor sources as identified by SMAQMD. As a result, potential exposure of sensitive receptors to objectionable odors would be **less than significant**.

The occurrence and severity of odor impacts depends on numerous factors, including the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of the affected receptors. While offensive odors rarely cause any physical harm, they can still be very unpleasant, leading to considerable distress among the public and often generating citizen complaints to local governments and regulatory agencies. Impacts related to odors resulting from the project are discussed below.

Demolition

The predominant source of power for construction equipment is diesel engines. Exhaust odors from diesel engines may be considered offensive to some individuals. The generation of these odor emissions would vary greatly on a day-to-day basis depending on the type of abatement and demolition activities. Odors from the use of heavy-duty diesel equipment would be intermittent and temporary and would dissipate rapidly from the source with an increase in distance. Given the temporary nature of abatement and demolition activities and the highly dispersive properties of diesel PM, the project would not result in an odor-related impact during abatement and demolition of the existing buildings.

Future Development

Construction activities associated with future development at the project site would generate odors of a similar type and intensity as abatement and demolition. However, architectural coatings would also be a source of odors during construction activities. Architectural coatings would be applied intermittently as buildings are completed and any odors from their application would dissipate quickly. Therefore, construction activities would not result in an odor-related impact.

As stated previously, SMAQMD identifies land uses such as wastewater treatment plants, cultivation operations, and waste handling facilities as typically being associated with the generation of nuisance odors. Future development of the project site would include a mix of academic, residential, hospitality, commercial, entertainment, office, parking, and related uses. These land use types are not associated with the emission of operational odors. Therefore, the project would not result in long-term operational odor impacts.

Summary

Demolition and Construction-related odors would occur intermittently, disperse quickly, and would cease upon the completion of the demolition and construction work. Operational odors are not typically associated with the planned future land uses (e.g., academic, residential, hospitality, commercial, office, entertainment, parking). Therefore, the project would result in a **less-than-significant** impact related to the exposure of sensitive receptors to odors.

Mitigation Measures

No mitigation is required for this impact.

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4.7 GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

This section presents a summary of regulations applicable to greenhouse gas (GHG) emissions; a summary of climate change science and GHG sources in California; quantification of project-generated GHGs and discussion about their contribution to global climate change; and analysis of the project's resiliency to climate change-related risks. In addition, mitigation measures are recommended to reduce the project's contribution to climate change.

Comments related to GHG emissions and climate change were received in response to the Notice of Preparation (see Appendix A) identifying the nexus between building energy efficiency, material recycling, and material and building and reuse, and reductions in GHG emissions; the availability of the Sacramento Metropolitan Air Quality Management District (SMAQMD) Guide to Air Quality Assessment in Sacramento County (CEQA Guide) and the methodology for GHG/Climate Change CEQA analysis therein; and the ability of urban infill development to provide climate benefits. These issues are addressed in this section.

4.7.1 Regulatory Setting

FEDERAL

Federal Clean Air Act

The Clean Air Act (CAA), as amended, is the primary federal law that governs regulation of air quality nationwide. The CAA was enacted in 1963 and has been amended numerous times in subsequent years (1967, 1970, 1977, and 1990). On February 18, 2026, the US Environmental Protection Agency (EPA) published its final action on the August 2025 proposal entitled "Rescission of the Greenhouse Gas Endangerment Finding and Motor Vehicle Greenhouse Gas Emission Standards Under the Clean Air Act" (EPA 2026). In this action, EPA rescinded the 2009 Endangerment Finding and repealed all GHG standards for light-, medium-, and heavy-duty vehicles and engines on the basis that CAA Section 202(a)(1) does not authorize the findings or the vehicle emission standards.

Fuel Economy Standards

The National Highway Traffic Safety Administration (NHTSA) and EPA set the Corporate Average Fuel Economy Standards (CAFE) standards to improve the average fuel economy and reduce GHGs generated by cars and light-duty trucks. The most recent update was in 2024, and the CAFE standards were finalized for model years (MYs) 2027 through 2031. The final rule establishes standards that require an industry-wide fleet average of approximately 49 miles per gallon (mpg) for passenger cars and light trucks. The final rule establishes standards that would require an industry-wide fleet average of approximately 50.4 mpg in MY 2031 for passenger cars and light trucks and an industry-wide fleet average for heavy-duty pickup trucks and vans (HDPUVs) of roughly 2.851 gallons per 100 miles in MY 2035. The final CAFE standards increase by 2 percent per year for passenger cars in MYs 2027–2031 and by 2 percent per year for light trucks in MYs 2029–2031. The final HDPUV fuel efficiency standards increase at a rate of 10 percent per year in MYs 2030–2032 and 8 percent per year in MYs 2033–2035 (NHTSA 2025).

On December 5, 2025, NHTSA published a proposal to "substantially recalibrate" the CAFE program, including amending the fuel economy standards for light-duty vehicles for model MYs 2022–2026 and MYs 2027–2031. The proposal would set fuel economy standards that increase from newly proposed MY 2022 standards at a rate of 0.5 percent per year through MY 2026, followed by 0.25 percent per year through MY 2031, with MY 2027 stringency established as a bridge between the two sets of standards. NHTSA projects that the amended standards would correspond to an industry fleetwide average for all light-duty vehicles of roughly 34.5 mpg in MY 2031 (Department of Transportation, National Highway Traffic Administration, The Safer Affordable Fuel-Efficient [SAFE] Vehicles Rule III for Model Years 2022 to 2031 Passenger Cars and Light Trucks, 90 Fed. Reg. 56,438 [December 5, 2025]). Public comment on the proposal was open through January 20, 2026. As of the date of this writing, NHTSA has not finalized the proposal.

For further information on CAFE standards refer to Section 4.6, "Air Quality."

Medium- and Heavy-Duty Vehicle Program

EPA and NHTSA set fuel efficiency and GHG standards for medium- and heavy-duty trucks.

As noted above, on February 18, 2026, EPA published its final action on the August 2025 proposal entitled "Rescission of the Greenhouse Gas Endangerment Finding and Motor Vehicle Greenhouse Gas Emission Standards Under the Clean Air Act" (EPA 2016). In this action, EPA rescinded the 2009 Endangerment Finding and repealed all GHG standards for light-, medium-, and heavy-duty vehicles and engines on the basis that CAA section 202(a)(1) does not authorize either the findings or the vehicle emission standards.

Construction Equipment Emission Standards

EPA established tiered emissions standards for construction equipment (i.e., nonroad diesel engines) to phase in cleaner-burning equipment that will reduce nitrogen oxides (NO_X) and particulate matter emissions from exhaust. After 2014, all construction equipment manufactured in the United States is required to meet the highest tier of emission standards, Tier 4. EPA oversees implementation of these regulations (CFR Chapter 40, Parts 1039, 1065, and 1068).

Congressional Actions

Public Law No. 119-15

On June 12, 2025, Public Law No. 119-15, enacting House Joint Resolution 87, was signed into law. The law used the Congressional Review Act (CRA) to nullify EPA's action granting California a waiver to enforce stricter emissions standards for heavy-duty vehicles under the CAA. The nullified waiver included programs such as the Advanced Clean Trucks regulation and zero-emission requirements for airport shuttles. Pursuant to the provisions of the CRA Public Law 119-15 prevents EPA from implementing or reissuing the same or similar rules without new congressional authorization. As a result, these specific vehicle emission and warranty regulations are unenforceable.

Public Law No. 119-16

Similarly, on June 12, 2025, Public Law No. 119-16, enacting House Joint Resolution 88, became law. The law also relied on the CRA to void the EPA's December 2024 waiver under the CAA that allowed California to implement and enforce the Advanced Clean Cars (ACC) II regulation. ACC II included a zero-emission vehicle (ZEV) mandate targeting 100 percent new light-duty ZEV sales by 2035.

Public Law No. 119-17

Similarly, on June 12, 2025, Public Law No. 119-17, enacting House Joint Resolution 89, became law. The law also relied on the CRA to void EPA's January 6, 2025, waiver under the CAA that allowed California to implement and enforce the "Omnibus Low NOx Regulation." The Omnibus Regulation sought to significantly reduce NOx emissions from heavy-duty vehicles with the potential for indirect effects on fuel efficiency and mileage.

Together, Public Laws 119-15, 119-16 and 119-17 (collectively, the CRA Resolutions) mark the first time that the CRA has been used to revoke waivers granted by EPA under the CAA. California has filed litigation challenging all three enactments. As of the date of this writing, the CRA Resolutions have not been overturned or stayed. In response to these federal actions, California Air Resources Board (CARB) adopted the Emergency Vehicle Emissions Regulations as a temporary measure to retain enforcement of its medium- and heavy-duty vehicle standards.

STATE

Legislative GHG Reduction Targets

The state has passed legislation that establishes a broad framework for the long-term GHG reduction and climate change adaptation programs. The following bills are the primary laws related to GHG reduction targets that are also relevant to California's energy goals.

- **Assembly Bill 32 (2006), The Global Warming Solutions Act, HSC Section 38500 et seq.** Assembly Bill (AB) 32 codified the 2020 reduction target of California Executive Order (EO) S-03-05 (i.e., by 2020, reach the GHG emission

reductions to achieve 1990 levels). AB 32 also gave CARB authority to develop a scoping plan that describes the approach California will take to achieve GHG reduction targets.

- **Senate Bill 32, HSC Section 38566.** Senate Bill (SB) 32 codified the 2030 reduction target of EO B-30-15 (i.e., by 2030, reach statewide GHG emission levels of 40 percent below 1990 levels). AB 197 of 2016 (Chapter 250, Statutes of 2016) required CARB, in implementing the SB 32 2030 GHG reduction target, to (1) prioritize emissions reductions to consider the "social costs" of GHG emissions and (2) prioritize "direct emission reductions" at large stationary sources and at mobile sources.
- **AB 1279, The California Climate Crisis Act, HSC Section 38562.2.** Codifies stringent emissions targets for the state to achieve net-zero GHG emissions as soon as possible, but no later than 2045, and achieve and maintain net-negative GHG emissions thereafter, while also ensuring that by 2045, statewide anthropogenic GHG emissions are reduced to at least 85 percent below the statewide GHG emissions limits (i.e., 1990 levels).

State Agency GHG Reduction Plans

CARB and other state agencies have adopted the following GHG reduction plans:

- **2022 Scoping Plan for Achieving Carbon Neutrality.** CARB adopted the Final 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) on December 16, 2022, which traces the state's pathway to achieve net-zero GHG emissions as soon as possible, but no later than 2045, and achieve and maintain net-negative GHG emissions thereafter, while also ensuring that by 2045, statewide anthropogenic GHG emissions are reduced to at least 85 percent below the statewide GHG emissions limits (i.e., 1990 levels) (CARB 2022a). These targets are in line with scientifically established levels to limit the rise in global temperature to no more than 2 degrees Celsius (°C), the warming threshold at which major climate disruptions, such as super droughts and rising sea levels, are projected; these targets also pursue efforts to limit the temperature increase even further, to no more than 1.5°C. The 2022 Scoping Plan identifies the reductions needed by each GHG emission sector (e.g., transportation [including off-road mobile-source emissions], industry, electricity generation, agriculture, commercial and residential, pollutants with high global warming potential, and recycling and waste) to achieve these goals. The 2022 Scoping Plan details a multitude of strategies for reducing GHG emissions in each of these sectors. Examples of strategies include achieving a per capita vehicle miles traveled (VMT) reduction of at least 25 percent below 2019 levels by 2030 and 30 percent below 2019 levels by 2045 to reduce GHGs from the transportation sector, achieving three million all-electric and electric-ready homes by 2030 and seven million by 2035 with six million heat pumps installed statewide by 2030 to reduce GHG emissions in the commercial and residential building sectors, and using long-term planning processes to support grid reliability and expansion of renewable and zero-carbon resource and infrastructure deployment to reduce energy sector GHG emissions. The 2022 Scoping Plan is the most current scoping plan.

Transportation Planning

- **SB 375, Chapter 728, Statutes of 2008.** SB 375 provides for a planning process that integrates regional transportation, land use, GHG reduction, and housing planning. SB 375 requires regional transportation plans (RTPs) to incorporate a sustainable communities strategy (SCS) that demonstrates how the region would achieve its passenger vehicle GHG emission reduction targets set by CARB. In the *2022 Progress Report California's Sustainable Communities and Climate Protection Act*, CARB states that an RTP/SCS that meets the applicable SB 375 targets alone will not result in the GHG emission reductions necessary to meet state climate goals in 2030 or 2050 (CARB 2022b). CARB has also noted that greater reductions in VMT will be required to make up the 6 percent gap in GHG reductions. Further, CARB states that California is still not reducing GHG emissions from personal vehicle travel as needed to meet climate commitments and as targeted under SB 375 (CARB 2022b).

Fuel Economy Standards and Electric Vehicles

- **EO N-79-20.** Signed by Governor Newsom on September 23, 2020, EO N-79-20 set a goal of 100 percent of in-state sales of passenger cars and trucks to be ZEVs by 2035; 100 percent of operating medium- and heavy-duty vehicles to be ZEVs by 2045; and 100 percent of drayage trucks and off-road vehicles and equipment to be ZEVs by 2035. The order also tasks the California Energy Commission (CEC) with providing an updated assessment of

the infrastructure needed to support this level of ZEV adoption (CARB 2021). The Governor's Interagency Working Group on ZEVs developed the ZEV Action Plan, issued in 2013 and subsequently updated in 2016 and 2018, to identify actions that support the state's ZEV goals. Some actions in the ZEV Action Plan that are particularly relevant to the Clean Transportation Program include ensuring ZEVs are accessible to a broad range of Californians and making ZEV technologies commercially viable in the medium- and heavy-duty and freight sectors. Many recommendations in the ZEV Action Plan have been captured in the Clean Transportation Program since its inception and continue to be program priorities (CARB 2021).

- Advanced Clean Cars (ACC) Program (passenger vehicles). AB 1493 of 2002 (known as Pavley I, Chapter 200, Statutes of 2002) provided the nation's first GHG standards for automobiles. AB 1493 required CARB to adopt vehicle standards that lowered GHG emissions from new light-duty autos to the maximum extent feasible beginning in 2009. In 2012, additional strengthening of the Pavley standards, referred to as the ACC Program's Low Emission Vehicle III Regulation, was adopted for vehicle MYs 2017–2025 (California Code of Regulations [CCR], Title 13, Section 1900 et seq.).

  The ACC Program also included the Zero Emission Vehicle Program and the Clean Fuels Outlet Regulation. The Zero Emission Vehicle Program was designed to achieve California's long-term emission reduction goals by requiring manufacturers to offer specific numbers of ZEVs for sale, which include battery electric, fuel cell, and plug-in hybrid electric vehicles (EVs). The Clean Fuels Outlet regulation is intended to ensure that fuels, such as electricity and hydrogen, are available to meet the fueling needs of new advanced technology vehicles as they come to market. CARB adopted the ACC II Program in August 2022. As stated above, Public Law No. 119-16 revoked California's waiver to implement the ACC II fuel economy standards.

- Low Carbon Fuel Standard. The Low Carbon Fuel Standard (LCFS) originally mandated that a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020 (17 CCR Section 95480 et seq.). In September 2018, to help achieve the SB 32 emission reduction target, the LCFS regulation was amended to increase the statewide goal to a 20 percent reduction in carbon intensity of California's transportation fuels by 2030. The majority of the emissions benefits due to the LCFS come from the production cycle (upstream emissions) of the fuel rather than the combustion cycle (tailpipe). On November 8, 2024, CARB approved amendments to the LCFS regulation to maintain momentum for global, national, and local private sector investment toward increasing cleaner fuel and transportation options for consumers, accelerating the deployment of zero-emission infrastructure and clean fuel production to support clean vehicle regulations, and keeping the state on track to meet statutorily mandated air quality and climate targets (CARB 2025a). On June 27, 2025, the Office of Administrative Law (OAL) approved the rulemaking for the latest version of the LCFS with an effective date of July 1, 2025 (CARB 2025a).

- Medium- and heavy-duty vehicles. In 2008, CARB approved the Phase 1 Tractor-Trailer Greenhouse Gas Regulation to reduce GHG emissions by requiring the use of aerodynamic tractors and trailers that are also equipped with low-rolling-resistance tires (13 CCR Section 2020 et seq.). The regulation applies to specific Class 8 tractors manufactured for use in California and is harmonized with the parallel EPA and NHTSA Phase 1 heavy-duty truck standards. CARB amended the Tractor-Trailer Greenhouse Gas Regulation in 2019 (Phase 2 standards) to align with EPA and NHTSA Phase 2 heavy-duty truck standards. As stated above, EPA has rescinded all light-, medium- and heavy-duty vehicle GHG standards, including the Phase 1 and Phase 2 medium- and heavy-duty truck standards.

- Advanced Clean Trucks. The Advanced Clean Trucks regulation was adopted by CARB on April 28, 2023. The Advanced Clean Trucks regulation set requirements for the transition of diesel trucks and vans to zero-emission trucks, which began in 2024. EPA granted the waiver request for the Advanced Clean Trucks regulation on April 6, 2023. However, as stated above, Public Law 119-15, enacting House Joint Resolution 87, was signed into law to nullify EPA's grant of a waiver to California (CARB 2025b). These specific vehicle emission and warranty regulations are thus unenforceable.

- Advanced Clean Fleets. CARB's 2022 Advanced Clean Fleets regulation was developed to reduce diesel particulate matter through the transition of medium- and heavy-duty trucks to become fully electric by 2045. In January 2025, California withdrew its request for a waiver and authorization for the addition of the Advanced

Clean Fleets regulation to its emissions control program. CARB is not enforcing the existing portions of the Advanced Clean Fleets regulation that would require a federal waiver or authorization, such as the portions of the Advanced Clean Fleet regulation that apply to high-priority and drayage fleets. However, not all elements of the Advanced Clean Fleets regulation require a federal waiver or authorization. State and local government fleets will still be required to be fully electric by 2045.

- **Innovative Clean Transit.** The Innovative Clean Transit (ICT) regulation was adopted in 2018 and requires all public transit agencies to incrementally reduce fleet vehicle tailpipe emissions and prioritize innovative first- and last-mile connectivity and improved mobility for transit riders. The ICT regulation was developed to align with other state policies, including the Sustainable Communities and Climate Protection Program (SB 375) and SB 350. SB 375 creates initiatives for increased development of transit-oriented communities, better-connected transportation, and active transportation. SB 350 provides an opportunity for transportation electrification, including the wide use of zero-emission buses. Under SB 350, the California Public Utilities Commission (CPUC) is collaborating with CARB and CEC to implement requirements set forth by SB 350 to support widespread transportation electrification. This regulation strives to enhance transit service through increased mobility options and has built in technological and financial safeguards to ensure transit service or fares are not adversely impacted by the regulation (CCR Title 13, Section 2023).
- **AB 126:** Approved by the governor on October 7, 2023, AB 126 includes provisions to provide, upon appropriation by the legislature, funding to various private and public entities to help attain the state's climate change policies. AB 126 is intended to facilitate the development and deployment of zero-emission technology and fuels in the marketplace where feasible and near-zero-emission technology and fuels elsewhere. Provisions related to EVs and EV infrastructure include the creation of the Air Quality Improvement Program (HSC Section 44274[a]) to provide funding for zero-emission fuel projects where feasible and near-zero-emission fuel projects elsewhere to develop and improve zero-emission and near-zero-emission fuels (HSC Section 44272[h][1]). The Air Quality Improvement Program provides funding for homeowners who purchase a plug-in EV to offset costs associated with modifying electrical sources to include a residential plug-in EV charging station (HSC Section 44272 [h][13]). Funding is also authorized for incentives for medium- and heavy-duty vehicles and equipment mitigation, including electric, hybrid, and plug-in hybrid on-road and off-road medium- and heavy-duty equipment (HSC Section 44274[c][4]).

Renewable Energy

- **Renewables Portfolio Standard**. SB 1078 established California's Renewables Portfolio Standard (RPS). The program continually sets escalating renewable energy procurement requirements for the state's load-serving entities. Generation must be procured from RPS-certified facilities. SB 2 (1X) of 2011 obligated all California electricity providers to obtain at least 33 percent of their energy from renewable resources by 2020. CPUC and CEC are jointly responsible for implementing the program. All electricity retail sellers had an interim target between compliance periods to serve at least 38.5 percent of their load with RPS-eligible resources by December 31, 2022. In general, retail sellers either met or exceeded the interim 38.5 percent target and are on track to achieve their compliance requirements. In 2018, SB 100 (Public Utilities Code Sections 399.11, 399.15, 399.30, and 454.53) was signed into law, which again increases the RPS to 60 percent by 2030 and requires all the state's electricity to come from carbon-free resources by the end of 2045.
- **SB 350 (Chapter 547, Statutes of 2015)**. SB 350 established the 2030 targets for the RPS and required CPUC to establish an integrated resource planning (IRP) process to require that load-serving entities in the state develop their future energy portfolios to align with California's clean energy goals.
- **SB 100 (Chapter 312, Statutes of 2018)**. Established a new RPS target of 50 percent by 2026, increased the RPS target in 2030 from 50 to 60 percent, and established a goal of 100 percent zero-carbon energy sources by 2045.
- **SB 1020 (Chapter 361, Statutes of 2022)**. Superseded the goals of SB 100 by requiring that 90 percent of all retail sales of electricity to California end-use customers be procured from renewable energy and zero-carbon resources by December 31, 2035. The requirement increases to 95 percent by December 31, 2040, and to 100 percent by December 31, 2045. Under SB 1020, state agency facilities must use 100 percent renewable and zero-carbon energy resources by December 31, 2035.

- **Integrated Energy Policy Report.** Pursuant to SB 1389 (Chapter 568, Statutes of 2002) CEC adopts an Integrated Energy Policy Report (IEPR) every 2 years and an update every other year. The 2024 IEPR Update is the most recent IEPR. The 2024 IEPR Update contains an assessment of major energy trends and issues in California's electricity, natural gas, and transportation fuel sectors. The report provides policy recommendations to conserve resources; protect the environment, ensure reliable, secure, and diverse energy supplies; enhance the state's economy; and protect public health and safety, including the accelerated connection of clean energy, the California Energy Demand Forecast, the potential growth of hydrogen in the state, and updates to issues such as energy efficiency, gas utility decarbonization, and the Clean Transportation Program (CEC 2024a).
- **California Building Energy Efficiency Standards.** The energy consumption of new residential and nonresidential buildings in California is regulated by the California Energy Code's Building Energy Efficiency Standards (California Energy Code) (24 CCR Part 6). CEC updates the California Energy Code every 3 years, adding more stringent design requirements to reduce energy consumption. The 2025 Building Energy Efficiency Standards (2025 California Energy Code) became effective on January 1, 2026. According to CEC, the 2025 California Energy Code expands upon prior requirements for electric-ready appliances and solar PV systems and puts particular emphasis on encouraging efficient electric heat pump technology for space and water heating in newly constructed single-family and multifamily buildings and select nonresidential building types; replacing end-of-life rooftop heating, ventilation, and air-conditioning units of a certain size with high-efficiency systems; mandatory requirements for EV charging infrastructure; establishing electric-ready requirements for commercial kitchens and some multifamily buildings; updating solar and storage standards for assembly buildings to make clean energy available for on-site use while minimizing exports to the electrical grid; and increasing ventilation standards to improve indoor air quality in multifamily buildings. On June 30, 2025, the governor signed AB 130, which institutes a 6-year freeze on updates to state and local residential building standards through 2031, with exceptions only for emergency measures, energy/fire safety, accessibility, and wildland-urban code updates. During this period, local jurisdictions may not adopt new residential building code amendments unless the Building Standards Commission confirms that they are emergency standards to protect public health and safety. The law also guarantees that builders may use the same building codes that were in effect when model-homes were approved for up to 10 years or when the project is complete, whichever comes first, unless the builder substantially changes the building design during that period. This provision ensures long-term planning stability and protects builders from sudden code shifts.
- **California Green Building Standards Code.** California has adopted the Green Building Standards Code (CALGreen Code) (24 CCR Part 11), which identifies both mandatory and voluntary aggressive energy efficiency standards for new residential and nonresidential buildings. The standards are updated every 3 years. The current version is the 2025 CALGreen Code, which became effective January 1, 2026. The 2025 version proposes increased requirements for EV charging infrastructure (i.e., a higher percentage of parking spaces that must be equipped with EV chargers and more stringent requirements for the types of chargers that must be installed) in both residential and nonresidential buildings. The 2025 CALGreen Code also includes required analysis of embodied carbon in building materials and updates to energy efficiency standards aimed at further reducing energy consumption in buildings and promoting the use of renewable energy sources (CEC 2024b). As discussed above, AB 130 freezes the residential building code, including the CALGreen Code, until 2031; however, the requirements of the 2025 nonresidential CALGreen Code have been applied to new nonresidential development as of January 1, 2026.
- **AB 130.** AB 130 of 2025 imposes a moratorium on changes to California building codes affecting residential units, including both state and local amendments, through 2031, with limited exemptions. AB 130 prohibits any adopting agency from considering, approving, or adopting any proposed building standards affecting residential units, unless the California Building Standards Commission deems those changes necessary as emergency standards to protect health and safety. The 2025 Energy Code will proceed as planned with an effective date of January 1, 2026, and the 2031 Energy Code cycle is anticipated to be unaffected.

Short-Lived Climate Pollutant Reduction Strategy

Pursuant to SB 1383 of 2016, CARB adopted the Short-Lived Climate Pollutant (SLCP) Reduction Strategy, which is part of CARB's 2017 Scoping Plan and is California's plan for reducing emissions of high global warming potential gases with short atmospheric lifetimes, including methane (CH_4). As one of its measures, the strategy strives to reduce GHG emissions and displace fossil-based natural gas (CARB 2017). It calls for the use of anaerobic digestion facilities at wastewater treatment plants to produce methane and the use of this methane to generate electricity (CARB 2017: 77–78).

California State University Sustainability Policy

The California State University (CSU) Sustainability Policy is a systemwide policy covering all CSU campuses and extending sustainability beyond facilities management to areas such as academics, the built environment, campus operations, energy, water, waste, transportation, procurement, and student life. The first systemwide Sustainability Policy was adopted by the CSU Board of Trustees in May 2014, establishing sustainability as an institution-wide responsibility and requiring campuses to track and report progress through the Sustainability Tracking, Assessment & Rating System (STARS). The policy was most recently substantially revised on March 23, 2022 and reviewed in 2024, when the Board of Trustees updated its climate and sustainability commitments. For GHG emissions, CSU's original targets focused primarily on Scope 1 and Scope 2 emissions (direct emissions from sources such as on-campus fuel combustion and indirect emissions associated with purchased electricity and other energy) using 1990 emissions as the baseline. CSU had a 2020 target of reducing emissions to 1990 levels or below, which it reports as having already achieved. Its revised long-term pathway now calls for an 80 percent reduction in GHG emissions below 1990 levels by 2040 and carbon neutrality by 2045. The policy uses several specific mechanisms to reach these goals, including improving energy efficiency, expanding on-site renewable-energy generation such as solar, increasing the use of lower-carbon purchased energy, sustainable energy procurement, reducing water and waste-related emissions, developing campus climate-action plans, and eliminating new natural-gas assets after 2035. Together, these measures are intended to progressively reduce CSU's operational carbon footprint while moving the entire university system toward carbon neutrality in 2045 (CSU 2024).

LOCAL

The buildings on the project site are located on State-owned property and would be demolished by the Department of General Services (DGS) and subsequent development is presumed to be undertaken by the California State University, Sacramento (Sacramento State), another State agency. As explained in Section 4.2, "Land Use and Planning," of this Draft EIR, under Section 4.2.1, "Local," state agencies are not subject to local plans, policies, and zoning regulations. Nevertheless, in the exercise of its discretion, DGS does reference, describe, and address local plans, policies, and regulations that may be applicable to the project. This evaluation is also intended to be used by local agencies for determining, as part of their permit processes, the project's consistency with local plans, policies, and regulations.

Sacramento Metropolitan Air Quality Management District

SMAQMD is the primary agency responsible for addressing air quality in Sacramento County. SMAQMD recommends methods for analyzing project-generated GHG emissions in CEQA analyses and offers multiple potential GHG reduction measures for land use development projects. SMAQMD developed thresholds of significance to provide a uniform scale to measure the significance of GHG emissions from land use and stationary source projects in compliance with CEQA to align with the statewide GHG emissions target of 40 percent below 1990 levels by 2030 with the passage of SB 32 for land use development projects (SMAQMD 2021). According to SMAQMD, pursuant to CEQA Guidelines Sections 15064(h)(3) and 15130(d), a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously adopted plan or mitigation program under specified circumstances.

The City has adopted a Climate Action and Adaptation Plan (CAAP) (see below) that provides project streamlining for GHG emissions pursuant to CEQA Guidelines section 15183.5. The City coordinates with the air district in achieving GHG emission reductions.

City of Sacramento General Plan

The City of Sacramento 2040 General Plan is the City's policy guide for future development. The 2040 General Plan establishes land uses that apply to the project area along with policies that guide development, design, and urban form. While the 2040 General Plan contains policies relating to GHG emissions, they are primarily implemented by the City rather than at the project level. The following policies from the 2040 General Plan may be applicable to the project. Although several policies reference air quality, by reducing criteria pollutant emissions, they would also reduce GHG emissions.

- ERC-4.1 Regional Coordination: The City shall support air quality planning efforts led by other local, regional, and State agencies while simultaneously leveraging City authority and resources to focus on reducing air pollution burden in disadvantaged communities.
- ERC-4.3 Project Design: The City shall promote the incorporation of new technologies, materials, and design and construction techniques in private development projects that minimize air pollution, noise, excess heat, and other forms of pollution and its impacts.
- ERC-4.5 Construction Emissions: The City shall ensure that construction and grading activities minimize short-term impacts to air quality by employing appropriate measures and best practices. Refer to Basic Construction Emissions Control Practices (BMPs) recommended by the Sacramento Metropolitan Air Quality Management District (SMAQMD).
- ERC-4.6 Gas-Powered Landscaping Equipment: The City shall encourage alternatives to gas-powered landscaping equipment that would reduce exposure to air and sound pollution caused by the use of these machines.
- ERC-5.6 Renewable Energy: The City shall promote energy conservation throughout the community and encourage the use of renewable energy systems and technologies to supplement or replace traditional building energy systems with the goal of converting to carbon-free energy use by 2045. As part of this effort, the City shall publicize and promote the availability of programs such as Sacramento Municipal Utility District's (SMUD's) Community Solar, Neighborhood SolarShares, and Commercial SolarShares programs.
- ERC-9.1 Communitywide GHG Reduction: The City shall implement the Climate Action and Adaptation Plan (CAAP), a qualified greenhouse gas (GHG) reduction plan that meets the requirements of the California Environmental Quality Act (CEQA) Guidelines 15183.5(b), to reduce community and municipal emissions consistent with the state's GHG reduction goals.
- ERC-9.2 Additional GHG Emissions Programs: The City shall continue to evaluate the feasibility and effectiveness of new policies, programs, and regulations that contribute to achieving the City's long-term greenhouse gas (GHG) emissions reduction goals. Efforts should build on the strategies articulated in the Climate Action and Adaptation Plan (CAAP).
- ERC-9.4 Carbon-Neutral Buildings: The City shall work to transition fossil fuel-powered buildings to electric power communitywide, implementing a phased strategy that targets new construction starting in 2023 and progressively incorporating measures to ensure the electric powered retrofit of existing buildings by 2045.
- ERC-9.5 Climate Change Assessment and Monitoring: The City shall continue to assess and monitor climate change impacts and adaptive capacity and strive for improvement.
- ERC-9.9 Onsite Alternative Energy Creation: The City shall support and encourage alternative energy creation and onsite energy production, such as thermal systems, onsite photovoltaic, wind turbines, and other emerging technologies.

City of Sacramento Climate Action and Adaptation Plan

The City adopted the Sacramento CAAP, in tandem with the 2040 General Plan Update, on February 27, 2024. The CAAP is a qualified plan as described in CEQA Guidelines section 15183.5. Projects consistent with the plan are entitled to streamlined CEQA review for GHG emissions. The CAAP includes twelve GHG reduction measures containing 74 actions to reduce emissions across major sectors, including cleaner transportation, energy-efficient and

electrified buildings, expanded renewable energy and storage, and waste reduction. The CAAP was developed to align with the state's GHG reduction targets codified in SB 32 and AB 1279. Specifically, the CAAP aims to reduce Sacramento's per capita GHG emissions to 3.63 metric tons of carbon dioxide equivalent ($MTCO_2e$) per person by 2030 (equal to 63 percent below 1990 levels) and reach carbon neutrality by reducing Sacramento's per capita GHG emissions to net zero $MTCO_2e$ per person by 2045, (equal to 100 percent below 1990 levels) (City of Sacramento 2024a). Many of the GHG reduction measures and actions included in the CAAP direct city-wide efforts to support the reduction of GHGs across all sectors in the City of Sacramento. However, the following measures from the CAAP may be applicable to the project:

- **Measure E-2**: Eliminate natural gas in new construction.
- **Measure E-4:** Increase the amount of electricity produced from local resources and work with SMUD to install additional local storage by 2030.
- **Measure E-5:** Support infill growth to ensure that 90 percent of growth is in the established and center/corridor communities and 90 percent small-lot and attached homes by 2040, consistent with the regional Sustainable Communities Strategy. Project-level VMT should be 15 percent below (or 85 percent of) the regional average.
- **Measure TR-3:** Achieve zero-emission vehicle adoption rates of 28 percent for passenger vehicles and 22 percent for commercial vehicles by 2030 and 100 percent for all vehicles by 2045.
- **Measure W-1:** Work to reduce organic waste disposal 75 percent below 2014 levels by 2025.
- **Measure WW-1:** Reduce water utility emissions (in MT CO_2e per million gallon) delivered by 100 percent by 2030 and maintain that through 2045.
- **Measure WW-2:** Reduce wastewater emissions by 22 percent by 2030 and 40 percent by 2045.
- **Measure CS-1:** Increase urban tree canopy cover to 25 percent by 2030 and 35 percent by 2045.

City of Sacramento New Building Electrification Ordinance

On November 29, 2022, City Council adopted a new building electrification ordinance. After adoption of the new building electrification ordinance, a decision of the United States Court of Appeals for the Ninth Circuit (the "Ninth Circuit") reversing a United States District Court decision in the California Restaurant Association v. City of Berkeley case made the new building electrification ordinance unenforceable. The Ninth Circuit determined that Berkeley's new building electrification ordinance was preempted by the federal Energy Policy and Conservation Act ("EPCA"). This decision impacts similar ordinances throughout the Ninth Circuit, including Sacramento's. Because of this decision, the City is not enforcing its ordinance prohibiting natural gas installation in all new construction. The vast majority of permit applications are for all-electric construction. As all-electric is cost-effective for the majority of new construction, and typically yields on-bill savings in Sacramento, it is anticipated that this trend is likely to continue. It is expected that market forces and City encouragement will achieve at least 75 percent of the relevant goal (i.e., reduction of GHG emissions), and savings can be achieved through other City efforts to make up the difference. The City will make every good faith effort on each project to achieve the plan goals, by electrification preferably. The CAAP remains qualified per California Code of Regulation Title 14 Section 15183.5.

4.7.2 Environmental Setting

THE PHYSICAL SCIENTIFIC BASIS OF GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

According to the Intergovernmental Panel on Climate Change (IPCC), human influence has warmed the climate at a rate that is unprecedented in at least the last 2,000 years (IPCC 2023a). In addition, IPCC, which was established in 1988 by the World Meteorological Organization and the United Nations Environment Programme, reported with high confidence that in 2019, CO_2 concentrations were higher than at any time in at least 2 million years and reported with

very high confidence that 2019 concentrations of CH_4 and nitrous oxide (N_2O) were higher than at any time in at least 800,000 years (IPCC 2023a). This warming induces large-scale changes in ocean circulation patterns, precipitation patterns, global ice cover, biological distributions, and other changes to the earth's system that are collectively referred to as climate change. The scale of recent changes across the climate system as a whole and the present state of many aspects of the climate system are unprecedented over many centuries to many thousands of years (IPCC 2023a). IPCC also reports that many changes in the climate system become larger in direct relation to increasing global warming, including increases in the frequency and intensity of extreme heat events, marine heatwaves, and heavy precipitation; agricultural and ecological droughts in some regions; and proportion of intense tropical cyclones, as well as reductions in Arctic sea ice, snow cover, and permafrost (IPCC 2023a). In addition, low-likelihood outcomes, such as ice sheet collapse, abrupt ocean circulation changes, some compound extreme events, and warming substantially greater than the assessed very likely range of future warming, cannot be ruled out (IPCC 2023a).

GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants (TACs). The long atmospheric lifetimes of GHGs allow them to be transported great distances from the original emissions source. GHGs and global climate change, therefore, represent cumulative impacts; that is, GHG emissions contribute, on a cumulative basis, to the significant adverse environmental impacts of global climate change.

EFFECTS OF CLIMATE CHANGE ON THE ENVIRONMENT

According to IPCC, global mean surface temperature increase by the end of the 21st century (2081–2100), relative to 1986–2005, could range from 0.5 to 8.7 degrees Fahrenheit (°F). Additionally, IPCC projected that global mean sea level rise will continue during the 21st century, very likely at a faster rate than observed from 1901 to 2015. By 2100, the rise will likely range from 18 to 33 inches (0.43 to 0.84 meters), relative to 1986–2005 (IPCC 2023b). According to *California's Fourth Climate Change Assessment*, with global GHGs reduced at a moderate rate, California will experience average daily high temperatures that are warmer than the historical average by 2.5 °F from 2006 to 2039, by 4.4 °F from 2040 to 2069, and by 5.6 °F from 2070 to 2100, and if GHG emissions continue at current rates, then California will experience average daily high temperatures that are warmer than the historic average by 2.7 °F from 2006 to 2039, by 5.8 °F from 2040 to 2069, and by 8.8 °F from 2070 to 2100 (OPR et al. 2018).

Since its previous climate change assessment in 2012, California has experienced several of the most extreme natural events in its recorded history: a severe drought from 2012 to 2016, an almost nonexistent Sierra Nevada winter snowpack in 2014/2015, increasingly large and severe wildfires, and back-to-back years of the warmest average temperatures (OPR et al. 2018). It is also noted in the *Safeguarding California Plan: 2018 Update* that California experienced the driest 4-year statewide precipitation on record from 2012 through 2015; the warmest years on average in 2014, 2015, and 2016; and the smallest and second-smallest Sierra snowpack on record in 2015 and 2014 (CNRA 2018). The 10 warmest years in the global 174-year record have all occurred during the last decade (2014–2024) (NOAA 2025a). The year 2023 ended the state's driest consecutive 3-year period with one of the snowiest years on record. Climate change is expected to amplify naturally occurring variability in the long term, potentially resulting in a shorter wet season in California but with more extreme atmospheric river storms and, consequently, greater flood damage risk (DWR and CNRA 2023). Elevated precipitation facilitates more plant growth, which, when directly followed by hot temperatures, dries out, leading to heavy and flammable ground and understory fuels, increasing the risk of large high-severity wildfires. Since 1900, only eight fires have burned more than 200,000 acres in the Sierra Nevada Conservancy (SNC) service area, all of which occurred from 2012 to 2024 (SNC 2024).

The changes in precipitation exacerbate wildfires throughout California through a cycle of high vegetative growth coupled with dry, hot periods, which lowers the moisture content of fuel loads. As a result, the frequency, size, and devastation of forest fires have increased.

In November 2018, the Camp Fire destroyed the town of Paradise in Butte County and caused 85 fatalities, becoming the state's deadliest fire in recorded history. The largest fires in the state's history have all occurred in the 2018–2020 period. Most recently, in January 2025, the Los Angeles area fires burned an area of approximately 50,000 acres, killing more than two dozen people, destroying over 15,000 homes and businesses, and creating unhealthy air quality for millions of people (NOAA 2025b).

Temperature increases and changes to historical precipitation patterns will likely affect ecological productivity and stability. Existing habitats may migrate from climatic changes where possible, and those habitats and species that cannot retreat will be severely threatened. Altered climate conditions will also facilitate the movement of invasive species to new habitats, thus outcompeting native species. Altered climatic conditions dramatically endanger the survival of arthropods (e.g., insects, spiders), which could have cascading effects throughout ecosystems. Conversely, a warming climate may support the populations of other insects, such as ticks and mosquitoes, which transmit diseases harmful to human health, such as the Zika virus, West Nile virus, and Lyme disease (European Commission Joint Research Centre 2018).

Changes in temperature, precipitation patterns, extreme weather events, wildfires, and sea level rise have the potential to threaten transportation and energy infrastructure, crop production, forests and rangelands, and public health (OPR et al. 2018). The effects of climate change will also have an indirect adverse impact on the economy as more severe natural disasters cause expensive, physical damage to communities and the state.

GREENHOUSE GAS EMISSIONS

Statewide Greenhouse Gas Emissions Trend

In 2023, emissions from statewide emitting activities were 360.4 million $MTCO_2e$ ($MMTCO_2e$), 10.7 $MMTCO_2e$ lower than 2022 levels and 70.6 $MMTCO_2e$ below the 2020 state GHG emissions reduction target of 431 $MMTCO_2e$ codified in AB 32 (CARB 2025c). In 2014, statewide GHG emissions dropped below the 2020 GHG target and have remained below the target since that time. Per capita GHG emissions in California have dropped from a 2001 peak of 13.8 metric tons per person to 9.2 metric tons per person in 2023, a 33.3 percent decrease. The continuation of the downward GHG emissions trend from 2022 to 2023 indicates that the increase in emissions from 2020 to 2021 is likely an anomaly caused by broader economic trends related to the COVID-19 pandemic and associated recovery (CARB 2025c).

City of Sacramento 2021 GHG Emissions Inventory

The City of Sacramento has completed a GHG inventory for the 2021 calendar year in the City of Sacramento Climate Action Plan (CAP) and assist in the development of an updated plan by developing a forecast and gap analysis to identify CAP policies that will be needed to achieve longer term targets. SB 326 established 2030 as the next major milestone of GHG reduction targets. The 2021 City of Sacramento GHG Inventory was used to develop a forecast to assist the City in setting targets which are consistent with State-level goals and the City of Sacramento General Plan, which is currently being updated, as stated above. A summary of the 2021 GHG emissions by sector is provided in Table 4.7-1.

Table 4.7-1 City of Sacramento GHG Emissions by Economic Sector (2016)

Sector	Emissions ($MTCO_2e$)	Percent
On-Road Vehicles	1,844,206	44
Off-Road Vehicles	107,174	3
Residential Building Energy	878,308	21
Commercial/Industrial Building Energy	555,596	13
High-GWP Gases	317,796	8
Agriculture	266,470	6
Solid Waste	156,744	4
Water & Wastewater	33,262	1
Total Emissions	**4,159,556**	**100**

Notes: $MTCO_2e$ = metric tons of carbon dioxide equivalent, GWP = Global Warming Potential

Sources: City of Sacramento 2024b.

As shown in Table 4.7-1, the transportation sector and residential building energy sector comprise the two largest GHG emitting sectors in the City of Sacramento.

4.7.3 Environmental Impacts and Mitigation Measures

METHODOLOGY

GHG emissions associated with the project would be generated during building abatement and demolition and during construction and operation of future development. Estimated levels of GHG emissions from building abatement and demolition, construction of future development, and operation of future development are presented below. The project is evaluated for its consistency with SMAQMDs GHG guidelines, which are reflective of the GHG reduction measures recommended to local governments in the 2022 Scoping Plan (see discussion under "Thresholds of Significance," below).

Short-term abatement/demolition and construction -generated GHG emissions were calculated using the California Emissions Estimator Model (CalEEMod), Version 2022.1.1.45, as recommended by SMAQMD. See emission calculations in Appendix C. Abatement/demolition and construction modeling was based on project-specific information (project schedules, equipment usage, demolition and hauling quantities and trips, etc.) where available; reasonable assumptions based on typical demolition/construction activities; and default values in CalEEMod that are based on the project's location and land use types

The project would require demolition of 729,700 total gross square feet (GSF) of building resulting in approximately 3,051 truck trips leaving the project site to haul away demolition waste (see Chapter 3, "Project Description). There would be up to approximately 55 workers onsite during peak activity periods when both abatement and demolition are occurring simultaneously. It is assumed that this would result in 110 daily worker trips per day.

It is assumed that construction of future developments would begin in 2030 and be completed by 2040. The gap between the end of building demolition and the beginning of new building construction is to allow for CEQA documentation for the new development to be completed. For the purposes of this analysis it is assumed that construction would include development of approximately 3,630,000 GSF of building space.

Operational modeling was estimated for the first year of operations (2028) to estimate the GHG emissions associated with the following sources: area sources (e.g., landscape maintenance equipment), energy use (e.g., natural gas consumption), waste, water (used in buildings and for landscaping), and mobile sources. Modeling was based on project-specific information (VMT, future land uses and sf) where available; and CalEEMod defaults values that are based on the project's location and land use types. The modelling used the project characteristics identified in Chapter 3, "Project Description;" approximately 3,630,000 building GSF of building space with land uses including the School of Public Affairs (which includes an innovation center and additional academic or cultural uses), student housing, a conference and event center, a hotel, an indoor performing arts and music venue, market rate housing apartments, retail space, and commercial office building space. Fehr & Peers conducted a traffic modelling and determined that implementation of the project would generate approximately 267,693 daily VMT (Fehr & Peers 2026).

THRESHOLDS OF SIGNIFICANCE

The significance criteria used to evaluate project impacts on climate change under CEQA are based on Section 15064 of the CEQA statute and relevant portions of Appendix G of the State CEQA Guidelines, which recommend that a lead agency consider a project's consistency with relevant, adopted plans and discuss any inconsistencies with applicable regional plans, including plans to reduce GHG emissions. Implementation of the Capitol Mall Office Buildings Demolition Project would result in a cumulatively considerable contribution to climate change if it would do any of the following:

- generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
- conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

With respect to GHG emissions, the State CEQA Guidelines Section 15064.4(a) states that lead agencies "shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions resulting from a project. The State CEQA Guidelines note that an agency has the discretion to either quantify a project's GHG emissions or rely on a "qualitative analysis or performance-based standards" (Section 15064.4[a]). A lead agency may use a "model or methodology" to estimate GHG emissions and has the discretion to select the model or methodology it considers "most appropriate to enable decision makers to intelligently take into account the project's incremental contribution to climate change" (Section 15064.4[c]). The State CEQA Guidelines provide that the lead agency should consider the following when determining the significance of impacts from GHG emissions on the environment (Section 15064.4[b]):

- The extent a project may increase or reduce GHG emissions as compared to the existing environmental setting.
- Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

The State CEQA Guidelines Appendix G is a sample Initial Study checklist that includes a number of factual inquiries related to the subject of climate change, as it does on a whole series of environmental topics. Notably, lead agencies are under no obligation to use these inquiries in fashioning thresholds of significance on these subjects, or indeed on any subject addressed in the checklist. (*Save Cuyama Valley v. County of Santa Barbara* (2013) 213 Cal.App.4th 1059, 1068.) Rather, with few exceptions, "CEQA grants agencies discretion to develop their own thresholds of significance." (*Ibid*.)

SMAQMD's GHG guidance is used in this analysis as it is in line with the state's most current GHG reduction targets under SB 32 and AB 1279 as outlined in the 2022 Scoping Plan. SMAQMD recommends methods for analyzing project-generated GHG emissions in CEQA analyses and offers multiple potential GHG emissions reduction measures for land use development projects. As described in its GHG threshold justification report, SMAQMD developed thresholds of significance to provide a uniform scale to measure the significance of GHG emissions from land use and stationary source projects in compliance with CEQA to align with the statewide GHG emissions target of 40 percent below 1990 levels by 2030 with the passage of SB 32 for land use development projects (SMAQMD 2020). These design features are similar to those recommended to local governments within Appendix D of the Scoping Plan; which identifies building decarbonization, VMT reductions, and the electrification of the mobile source sector as key priority areas that local jurisdictions can target to do their "fair share" in assisting the state in meeting its long-term goal of carbon neutrality by 2045 (CARB 2022a).

SMAQMD's most recent published guidance to address GHGs was released in February 2021. SMAQMD recommends that 1,100 $MTCO_2e$ per year ($MTCO_2e$/year) be applied as a bright-line screening threshold for evaluating construction emissions of GHGs. SMAQMD also recommends a tiered approach to evaluate the significance of operational emissions. All land use development projects are required to implement the following Tier 1 best management practices (BMPs) prior to the comparison of a project's operational GHG emissions to the 1,100 $MTCO_2e$ threshold:

- BMP 1 – Projects shall be designed and constructed without natural gas infrastructure.
- BMP 2 – Projects shall meet the current CALGreen Tier 2 standards, except all EV-capable spaces shall instead be EV-ready.

Projects can be screened out by comparing their attributes to SMAQMD's operational screening levels table (equivalent to 1,100 $MTCO_2e$/year) after including the implementation of Tier 1 BMPs. If the project emissions exceed the screening level or the project fails to implement Tier 1 BMPs, the project must implement Tier 2 BMP 3, which consists of reducing the project's VMT to meet the following requirements of the standards developed by the Governor's Office of Land Use and Climate Innovation (LCI) (formerly the Governor's Office of Planning and Research or OPR) pursuant to SB 743 (see Section 4.4, "Transportation and Circulation," for a summary of this bill):

- BMP 3 – Achieve the following VMT reduction targets compared to a county regional average:
  - 15 percent for residential projects,

- 15 percent for office projects, and
- no net increase in VMT for retail projects.

Projects that cannot meet the Tier 2 BMP 3 requirements must implement all feasible mitigation to reduce emissions.

Using SMAQMD's guidance, the project would result in a cumulatively significant climate change effect if it would:

- generate construction emissions exceeding 1,100 $MTCO_2e$/year for any year of construction;
- fail to implement SMAQMD's Tier 1 BMPs (i.e., the prohibition on natural gas infrastructure and meeting the current CALGreen Tier 2 Standards for EV charging);
- generate operational emissions exceeding 1,100 $MTCO_2e$/year following the implementation SMAQMD's Tier 1 BMPs; and
- fail to achieve the VMT reduction targets set forth by OPR under SB 743 if the project continues to exceed 1,100 $MTCO_2e$/year following the application of Tier 1 BMPs.

ISSUES NOT DISCUSSED FURTHER

All issues pertaining to GHG emissions and climate change are discussed in this analysis.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 4.7-1: Generate GHG Emissions, Either Directly or Indirectly, That May Have a Significant Impact on the Environment or Conflict with or Obstruct a GHG Reduction Plan

Demolition activities would not generate GHG emissions that would exceed SMAQMD's 1,100 $MTCO_2e$/year construction threshold. It is estimated that construction of new development would exceed the SMAQMD's 1,100 $MTCO_2e$/year construction threshold during some construction years. At this time, the development scenario is not sufficiently advanced to confirm that future development would be designed to be all-electric or include CALGreen Tier 2-compliant EV chargers and thus, it cannot be confirmed that it would meet the requirements of SMAQMD's Tier 1 BMPs. This impact would be **potentially significant**.

Demolition

Abatement and demolition activities would generate emissions of GHGs from the operation of off-road equipment, material delivery, worker commute trips, and other miscellaneous activities. As described above under "Methodology," building demolition would begin in 2027 and would last 18 months. The modelling calculated abatement and demolition occurring during the entirety of 2027, providing a complete annual emissions estimate. Table 4.7-2 provides a summary of the projected demolition-related emissions. As shown in Table 4.7-2, the project's yearly abatement and demolition emissions for 2027 would not exceed SMAQMD's 1,100 $MTCO_2e$ per year construction threshold. Any abatement and demolition activity in 2028 would not occur for a full year, and would therefore be less than the 2027 estimate.

Table 4.7-2 Summary of Maximum Demolition-Generated Emissions of GHG Emissions from the Project

Year	$MTCO_2e$/year
Demolition	
2027	738
SMAQMD Threshold	1,100
Exceed Thresholds?	**No**

Notes: $MTCO_2e$ = metric tons of carbon dioxide equivalent; SMAQMD = Sacramento Metropolitan Air Quality Management District.

Source: Modeling performed by Ascent in 2026.

Future Development

Construction

Construction activities supporting future development would generate emissions of GHGs associated with the use of off-road equipment, hauling trips, and worker commute trips. For the modelling it was assumed that construction of future development would begin in 2030 and be completed by the end of 2039. For specific construction assumptions and modeling inputs, refer to Appendix C. Table 4.7-3 summarizes the modeled annual GHG emissions from construction activities related to buildout of the project. As shown in Table 4.7-3, the project's annual construction-generate GHG emissions would exceed SMAQMD's 1,100 $MTCO_2e$/year construction threshold during most years.

Table 4.7-3 Summary of Maximum Construction-Generated GHG Emissions from the Project (2030-2039)

Year	$MTCO_2e$/year
Future Development	
2030	462
2031	1,162
2032	1,139
2033	1,113
2034	1,145
2035	1,397
2036	1,377
2037	1,354
2038	1,060
2039	381
SMAQMD Threshold	1,100
Exceed Thresholds?	**Yes**

Notes: $MTCO_2e$ = metric tons of carbon dioxide equivalent; SMAQMD = Sacramento Metropolitan Air Quality Management District.

Source: Modeling performed by Ascent in 2026.

Operations

Operation of future development would result in mobile-source GHG emissions associated with vehicle trips to and from the project site, area-source emissions from the operation of landscape maintenance equipment, energy-source emissions from the generation and utilization of energy sources such as electricity and natural gas, water-related energy consumption associated with water use and the conveyance and treatment of wastewater, and waste-generated emissions from the transport and disposal of solid waste.

As discussed above, the project's operational phase is compared against SMAQMD's operational GHG thresholds, which require that projects demonstrate compliance with SMAQMD's Tier 1 BMPs (i.e., all-electric development and adherence to CALGreen's voluntary Tier 2 EV charging standards) prior to the comparison of the project's operational GHG emissions against SMAQMD's 1,100 $MTCO_2e$ screening level for project operations. Based on project design information available at this time it cannot be assumed that the project will be designed to be all-electric or include CALGreen Tier 2-compliant EV chargers and therefore cannot be compared to SMAQMD's 1,100 $MTCO_2e$ screening level absent their implementation.

Conclusion

As shown in Table 4.7-2, demolition activities would not generate GHG emissions that would exceed SMAQMD's 1,100 $MTCO_2e$ per year construction threshold. Construction activities associated with implementation of future development would generate GHG emissions that would exceed SMAQMD's 1,100 $MTCO_2e$ per year construction threshold, as shown in Table 4.7-3. Regarding operation of future development, based on currently available information, the project is not designed to be all-electric or include CALGreen Tier 2-compliant EV chargers and

would thus not meet the requirements of SMAQMD's Tier 1 BMPs. Therefore, impacts related to both construction and operation of future development would be **potentially significant**.

Mitigation Measures

Mitigation Measure 4.7-1a: Construction GHG Emissions Reduction

The entity conducting redevelopment (e.g., Sacramento State) shall implement the following measures before and during construction:

Documentation shall be provided to SMAQMD that demonstrates the SMAQMD Construction GHG Emissions Reduction Measures presented below that would be incorporated into the project. Documentation shall also demonstrate that the degree to which these measures are implemented would be sufficient to reduce project-generate construction GHG emissions below SMAQMD's 1,100 $MTCO_2e$ threshold for construction emissions. SMAQMD's Construction GHG Emissions Reduction Measures include:

- Improve fuel efficiency from construction equipment:
  - Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to no more than 2 minutes (5-minute limit is required by the state airborne toxics control measure [Title 13, Sections 2449(d)(3) and 2485 of the California Code of Regulations]). Provide clear signage that posts this requirement for workers at the entrances to the site.
  - Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determined to be running in proper condition before it is operated.
  - Train equipment operators in proper use of equipment.
- Perform on-site material hauling with trucks equipped with on-road engines.
- Use alternative fuels for generators at construction sites such as propane or solar.
- Use electrical power, as feasible for each construction site and development project.
- Use a CARB-approved low carbon fuel for construction equipment, such as renewable diesel, if commercially available and feasible for use, in construction equipment for each construction site and development project (NOx emissions from the use of low carbon fuel must be reviewed and any increases in NOx through the use of low carbon fuel must be mitigated.)
- Encourage and provide carpools, shuttle vans, transit passes and/or secure bicycle parking for construction worker commutes.
- Reduce electricity use in the construction office by using compact fluorescent or light-emitting diode (LED) bulbs, powering off computers every day, and replacing heating and cooling units with more efficient ones.
- Recycle or salvage non-hazardous construction and demolition debris (goal of at least 75 percent by weight).
- Use locally sourced or recycled materials for construction materials (goal of at least 20 percent based on costs for building materials, and based on volume for roadway, parking lot, sidewalk and curb materials). Wood products utilized should be certified through a sustainable forestry program.
- Minimize the amount of concrete for paved surfaces or utilize a low carbon concrete option.
- Produce concrete on-site if determined to be less emissive than transporting ready mix and if feasible for each construction site and development project.
- Use SmartWay certified trucks for deliveries and equipment transport if available and economically feasible.
- Develop a plan to efficiently use water for adequate dust control.

Mitigation Measure 4.7-1b: Restrict Natural Gas Use

Prior to the issuance of any construction or operational permits from the SMAQMD, the entity conducting redevelopment (e.g., Sacramento State) shall demonstrate to the SMAQMD the omission of natural gas utilities in project plans.

Mitigation Measure 4.7-1c: Install CalGreen Tier 2-Compliant On-Site Electric Vehicle Charging Infrastructure

Prior to the issuance of any required construction or operational permits from the SMAQMD, the entity conducting redevelopment (e.g., Sacramento State) shall demonstrate to the SMAQMD that the appropriate number of EV charging equipment for each proposed land use type shall be installed to meet the Tier 2 requirements of Part 6 of the Title 24 California Building Code (CalGreen code) in effect at the time of project construction.

Significance after Mitigation

Construction

Mitigation Measure 4.7-1a would require that measures be included in the project design to incorporate SMAQMD's best management practices for reducing construction-related GHGs. These measures include use of efficient engines in off-road equipment, use of renewable fuels and electric equipment, limiting idling, and promotion of carpooling for construction workers. Mitigation Measure 4.7-1a requires that documentation demonstrating the sufficient application of these measures to reduce the project's construction GHGs below SMAQMD's 1,100 $MTCO_2e$ construction threshold be provided to SMAQMD. Implementation of Mitigation Measure 4.7-1a would reduce GHG emission impacts from construction of new development and would, therefore, be **less than significant with mitigation**.

Operation

Implementation of Mitigation Measure 4.7-1b would require the omittance of natural gas connections from project design. Mitigation Measure 4.7-1c would require that the project implement EV chargers of the type and quantity required to comply SMAQMD BMP 2. However, given the preliminary nature of the project design, it cannot be confirmed that Mitigation Measures 4.7-1b and 4.7-1c could be implemented fully. There may be specialized uses within the downtown campus facilities that require the use of natural gas. There may be limitations that are not known at this time that would limit the delivery of sufficient electricity to provide numerous EV chargers in a parking structure setting. Although these mitigation measures align with the intent and objectives of the California State University Sustainability Policy, full implementation of Mitigation Measured 4.7-1b and 4.7-1c cannot be assured given the limited project design information currently available. Therefore, this impact would be significant and unavoidable.

Although it cannot be assured that the future development scenario associated with the proposed project would be consistent with SMAQMD's Tier 1 BMPs, the project's operational emissions following the implementation of the Tier 1 BMPs were calculated and compared to SMAQMD's 1,100 $MTCO_2e$ screening level to disclose project GHG emissions if the TEIR 1 BMPs were able to be implemented. Anticipated annual project-generated operational GHG emissions are shown in Table 4.7-4.

Table 4.7-4 Annual Project-Generated Operational Greenhouse Gas Emissions (2040)

Emissions Sector	$MTCO_2e$/year
Mobile Source	28,435
Area Sources	60
Energy Consumption	3,503
Water Consumption and Wastewater Treatment	350
Solid Waste Generation	761
Refrigerants	91
Total Operational GHG Emissions	**33,200**
SMAQMD Screening Level	**1,100**
Threshold Exceeded?	**Yes**

Notes: Totals may not add due to rounding; GHG = greenhouse gas; $MTCO_2e$/year = metric tons of carbon dioxide equivalent per year; SMAQMD = Sacramento Metropolitan Air Quality Management District.

Source: Calculations prepared by Ascent in 2026.

As shown in Table 4.7-4, the project would exceed the 1,100 $MTCO_2e$ threshold following the application of SMAQMD's Tier 1 BMPs. Therefore, according to the SMAQMD CEQA Guidelines, the project would be required to implement Tier 2 BMP 3, which consists of reducing the project's VMT by 15 percent compared to the county regional average to meet the standard for residential projects per LCI's standards pursuant to SB 743. As discussed in Section 4.4, "Transportation and Circulation," the project site is in an area that currently generates work VMT per employee that is 16 percent below the regional average and household VMT per capita that is 28 percent below the regional average. As identified in the discussion of Impact 4.4-2, "Conflict or be Inconsistent with CEQA Guidelines Section 15064.3(b)," due to the project's proximity to major transit stops, the type and mix of proposed land uses, and the inclusion of residential and local-serving commercial retail uses, the project would maintain the low-VMT characteristics of the area. Since the project area has VMT levels more than 15 percent below the regional average, and these levels would be maintained with development of the proposed project, the project would meet the Tier 2 BMP 3 criteria.

In summary, as shown in Table 4.7-4, the project would exceed SMAQMD's operational GHG emissions screening level of 1,100 $MTCO_2e$. However, the project would also meet the VMT reduction target of 15 percent below the county regional average VMT to comply with Tier 2 BMP 3. Despite meeting this VMT target, it cannot be assured that Mitigation Measures 4.7-1b and 4.7-1c requiring the implementation of SMAQMD's Tier 1 BMPs can be fully implemented as part of future development. Therefore, the future development scenario would conflict with SMAQMD's VMT-related threshold. This impact would be **significant and unavoidable**.

4.8 ENERGY

This section was prepared pursuant to CEQA Guidelines Section 15126 and Appendix F of the CEQA Guidelines, which require that EIRs include a discussion of the potential energy impacts of projects. The analysis considers whether the project would result in inefficient, wasteful, and unnecessary consumption of energy.

Energy related to the project would include energy directly consumed for space heating and cooling, and electric facilities and lighting inside future development. Transportation-related energy consumption includes the use of fuels and electricity to power cars, trucks, and public transportation. Energy would also be consumed by equipment and vehicles used during project demolition, construction, and routine maintenance activities during operation.

Comments related to energy received in response to the Notice of Preparation requested that energy consumption and energy efficiency be considered in the EIR (see Appendix A); this issue is addressed in this section. Comments were also provided related to electricity delivery infrastructure. This issue is addressed in Section 4.5, "Utilities and Service Systems."

4.8.1 Regulatory Setting

Energy conservation is embodied in many federal, state, and local statutes and policies. At the federal level, energy standards apply to numerous products (e.g., consumer product energy conservation program under the Energy Policy and Conservation Act [EPCA] and the US Environmental Protection Agency's [EPA] Energy Star™ program) and to transportation (e.g., fuel efficiency standards under EPCA). At the state level, Title 24 of the California Code of Regulations sets forth energy standards for buildings. Further, the state provides rebates/tax credits for the installation of renewable energy systems and offers the Flex Your Power program, which promotes energy conservation in multiple areas. At the local level, individual cities and counties establish policies in their general plans and climate action plans (CAPs) related to energy efficiency in new development and land use planning, as well as the use of renewable energy sources.

FEDERAL

In March 2025, the current administration announced that EPA will undertake 31 actions, including numerous actions and regulations related to the reduction of greenhouse gas (GHG) emissions, which could affect energy consumption. These include, but are not limited to, reconsideration of regulations on power plants, limits on GHG emissions from motor vehicles, and fuel economy standards. At the time of the writing of this EIR, not all of these regulations have been repealed or replaced with newly adopted regulations. Therefore, these regulations are discussed below.

Energy Policy Act of 2005

The Energy Policy Act of 2005, implemented by the US Department of Energy, was intended to establish a comprehensive, long-term energy policy. The Energy Policy Act addresses energy production in the United States, including oil, gas, coal, and renewable forms of energy, and energy efficiency and tax incentives. Energy efficiency and tax incentive programs consist of credits for the construction of new energy-efficient homes and the production or purchase of energy-efficient appliances, and loan guarantees for entities that develop or use innovative technologies that avoid the production of GHGs.

Fuel Economy Standards

The National Highway Traffic Safety Administration (NHTSA) and EPA set the Corporate Average Fuel Economy (CAFE) standards to improve the average fuel economy and reduce GHGs generated by cars and light-duty trucks. The most recent update was in 2024, and the CAFE standards were finalized for model years (MYs) 2027 through 2031. The final rule establishes standards that require an industry-wide fleet average of approximately 49 miles per gallon (mpg) for passenger cars and light trucks. The final rule establishes standards that would require an industry-wide fleet average of approximately 50.4 mpg in MY 2031 for passenger cars and light trucks and an industry-wide

fleet average for heavy-duty pickup trucks and vans (HDPUVs) of roughly 2.851 gallons per 100 miles in MY 2035. The final CAFE standards increase at a rate of 2 percent per year for passenger cars in MYs 2027–2031 and 2 percent per year for light trucks in model years 2029–2031. The final HDPUV fuel efficiency standards increase by 10 percent per year in MYs 2030–2032 and by 8 percent per year in MYs 2033–2035 (NHTSA 2024).

On December 5, 2025, NHTSA published a proposal to "substantially recalibrate" the CAFE program, including amending the fuel economy standards for light-duty vehicles for model MYs 2022-2026 and MYs 2027-2031. The proposal would set fuel economy standards that increase from newly proposed MY 2022 standards at a rate of 0.5 percent per year through MY 2026, followed by 0.25 percent per year through MY 2031, with MY 2027 stringency established as a bridge between the two sets of standards. NHTSA projects that the amended standards would correspond to an industry fleetwide average for all light-duty vehicles of roughly 34.5 mpg in MY 2031. (Department of Transportation, National Highway Traffic Administration, The Safer Affordable Fuel-Efficient [SAFE] Vehicles Rule III for Model Years 2022 to 2031 Passenger Cars and Light Trucks, 90 Fed. Reg. 56,438 [December 5, 2025].) As of the date of this writing, NHTSA has not finalized the proposal.

These and any future iterations of these standards would apply to all passenger cars, light trucks, HDPUVs operating under the 20 Year Plan and Full Buildout.

For further information on CAFE standards refer to Section 4.6, "Air Quality," and Section 4.7, "Greenhouse Gas Emissions and Climate Change."

Medium-and Heavy-Duty Vehicle Program

In 2011, EPA and NHTSA finalized a joint rule that established a national program to reduce GHG emissions and improve fuel economy for new medium- and heavy-duty engines and vehicles. This rule—called the Phase 1 standards—requires fuel efficiency standards for engines in MYs 2014 through 2018 (40 Code of Federal Regulations [CFR] Parts 85, 86, 1036, 1037, 1065, 1066, and 1068). In 2016, EPA and NHTSA adopted the Phase 2 standards, which require fuel efficiency standards for engines in MYs 2018 through 2027 (40 CFR Parts 9, 22, 85, 86, 600, 1033, 1036, 1037, 1039, 1042, 1043, 1065, 1066, and 1068) (EPA 2025).

On August 1, 2025, EPA published its proposal to repeal all GHG emission standards for light-duty, medium-duty, and heavy-duty vehicles and engines. (Environmental Protections Agency, Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards, 90 Fed Reg. 36,288 (August 1, 2025).) As noted above, on February 18, 2026, EPA published its final action on the August 2025 proposal entitled "Rescission of the Greenhouse Gas Endangerment Finding and Motor Vehicle Greenhouse Gas Emission Standards Under the Clean Air Act." (91 Fed. Reg. 7686). In this action, EPA rescinded the 2009 Endangerment Finding and repealed all GHG standards for light-, medium-, and heavy-duty vehicles and engines on the basis that CAA section 202(a)(1) does not authorize either the findings or the vehicle emission standards.

Construction Equipment Emission Standards

The CFR established tiered emissions standards for construction equipment (i.e., nonroad diesel engines) to phase in cleaner-burning equipment that will reduce nitrogen oxides (NO_X) and particulate matter emissions from exhaust. After 2014, all construction equipment manufactured in the United States is required to meet the highest tier of emission standards, Tier 4. EPA oversees implementation of these regulations (CFR Chapter 40, Parts 1039, 1065, and 1068).

Federal Actions

As described further below, together Public Laws 119-15, 119-16, and 119-17 (collectively, the Congression Review Act [CRA] Resolutions) mark the first time that the CRA has been used to revoke waivers granted by EPA under the CAA. California has filed litigation challenging all three enactments. As of the date of this writing, the CRA Resolutions have not been overturned or stayed. In response to these federal actions, CARB adopted the Emergency Vehicle Emissions Regulations as a temporary measure to retain enforcement of its medium- and heavy-duty vehicle standards.

Public Law No. 119-15

On June 12, 2025, Public Law 119-15, enacting House Joint Resolution 87, was signed into law. The law used the CRA to nullify EPA's action granting California a waiver to enforce stricter emissions standards for heavy-duty vehicles under the CAA. The nullified waiver included programs such as the Advanced Clean Trucks regulation and zero-emission requirements for airport shuttles. Public Law 119-15 prevents EPA from implementing or reissuing the same or similar rules without new congressional authorization. This effectively blocks California and other states that follow its standards from enforcing these specific vehicle emission and warranty regulations.

Public Law No. 119-16

Similarly, on June 12, 2025, Public Law No. 119-16, enacting House Joint Resolution 88, became law. The law also relied on the CRA to void the EPA's December 2024 waiver under the CAA that allowed California to implement and enforce the Advanced Clean Cars (ACC) II regulation. ACC II included a zero-emission vehicle (ZEV) mandate targeting 100 percent new light-duty ZEV sales by 2035.

Public Law No. 119-17

Similarly, on June 12, 2025, Public Law No. 119-17, enacting House Joint Resolution 89, became law. The law also relied on the CRA to void the EPA's January 6, 2025, waiver under the CAA that allowed California to implement and enforce the "Omnibus Low NOx Regulation." The Omnibus Regulation sought to significantly reduce NOx emissions from heavy-duty vehicles with the potential for indirect effects on fuel efficiency and mileage.

STATE

State Agency GHG Reduction Laws, Regulations, and Plans

The California Legislature, CARB, and other state agencies have approved or adopted various GHG reduction laws, regulations, and plans, which often aim to reduce GHG emissions though the implementation of actions that increase energy efficiency, reduce the use of energy procured from fossil fuels, and increase the use of renewable energy sources. A description of these laws, regulations, and plans follows. These laws, regulations, and plans are discussed in further detail in Section 4.7, "Greenhouse Gas Emissions and Climate Change."

- **2022 Scoping Plan for Achieving Carbon Neutrality.** CARB adopted the *Final 2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan) on December 16, 2022. The 2022 Scoping Plan traces the state's pathway to achieve its goals of carbon neutrality and an 85 percent reduction in 1990 emissions by 2045, as codified by AB 1279 in September 2022 (CARB 2022). The 2022 Scoping Plan identifies the reductions needed by each GHG emission sector (e.g., transportation [including off-road mobile-source emissions], industry, electricity generation, agriculture, commercial and residential, pollutants with high global warming potential, and recycling and waste) to achieve these goals. The 2022 Scoping Plan outlines a range of strategies to reduce GHG emissions across these sectors. Examples of strategies include achieving a per capita vehicle miles traveled (VMT) reduction of at least 25 percent below 2019 levels by 2030 and 30 percent below 2019 levels by 2045, achieving three million all-electric and electric-ready homes by 2030 and seven million by 2035 with six million heat pumps installed statewide by 2030, and using long-term planning processes to support grid reliability and expansion of renewable and zero-carbon resource and infrastructure deployment.

Fuel Economy Standards and Electric Vehicles (EVs)

- **EO N-79-20.** Signed by Governor Newsom on September 23, 2020, EO N-79-20 set a goal of 100 percent of in-state sales of passenger cars and trucks to be ZEVs by 2035; 100 percent of operating medium- and heavy-duty vehicles to be ZEVs by 2045; and 100 percent of drayage trucks and off-road vehicles and equipment to be ZEVs by 2035. The order also tasks the California Energy Commission (CEC) with providing an updated assessment of the infrastructure needed to support this level of ZEV adoption (CARB 2021). The Governor's Interagency Working Group on ZEVs developed the ZEV Action Plan, issued in 2013 and subsequently updated in 2016 and 2018, to identify actions that support the state's ZEV goals. Some actions in the ZEV Action Plan that are particularly relevant to the Clean Transportation Program include ensuring ZEVs are accessible to a broad range of Californians and making ZEV technologies commercially viable in the medium- and heavy-duty and freight

sectors. Many recommendations in the ZEV Action Plan have been captured in the Clean Transportation Program since its inception and continue to be program priorities (CARB 2021).

- Advanced Clean Cars (ACC) Program (passenger vehicles). AB 1493 of 2002 (known as Pavley I, Chapter 200, Statutes of 2002) provided the nation's first GHG standards for automobiles. AB 1493 required CARB to adopt vehicle standards that lowered GHG emissions from new light-duty autos to the maximum extent feasible beginning in 2009. Additional strengthening of the Pavley standards, referred to as the ACC Program's Low Emission Vehicle III Regulation, was adopted for vehicle MYs 2017–2025 in 2012 (California Code of Regulations [CCR], Title 13, Section 1900 et seq.).

  The ACC Program also included the Zero Emission Vehicle Program and the Clean Fuels Outlet Regulation. The Zero Emission Vehicle Program was designed to achieve California's long-term emission reduction goals by requiring manufacturers to offer specific numbers of ZEVs for sale, which include battery electric, fuel cell, and plug-in hybrid EVs. The Clean Fuels Outlet regulation is intended to ensure that fuels, such as electricity and hydrogen, are available to meet the fueling needs of new advanced technology vehicles as they come to market. CARB adopted the ACC II Program in August 2022. As stated above, P.L. No. 119-16 revoked California's waiver to implement the ACC II fuel economy standards.

- Low Carbon Fuel Standard. The Low Carbon Fuel Standard (LCFS) originally mandated that a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020 (17 CCR Section 95480 et seq.). In September 2018, to help achieve the SB 32 emission reduction target, the LCFS regulation was amended to increase the statewide goal to a 20 percent reduction in carbon intensity of California's transportation fuels by 2030. The majority of the emissions benefits due to the LCFS come from the production cycle (upstream emissions) of the fuel rather than the combustion cycle (tailpipe). On November 8, 2024, CARB approved amendments to the LCFS regulation to maintain momentum for global, national, and local private sector investment toward increasing cleaner fuel and transportation options for consumers, accelerating the deployment of zero-emission infrastructure and clean fuel production to support clean vehicle regulations, and keeping the state on track to meet statutorily mandated air quality and climate targets (CARB 2025a). This regulation was ultimately adopted with an effective date of July 1, 2025 (CARB 2025a).

- Medium- and heavy-duty vehicles. In 2008, CARB approved the Phase 1 Tractor-Trailer Greenhouse Gas Regulation to reduce GHG emissions by requiring the use of aerodynamic tractors and trailers that are also equipped with low-rolling-resistance tires (13 CCR Section 2020 et seq.). The regulation applies to certain Class 8 tractors manufactured for use in California and is harmonized with the parallel EPA and NHTSA Phase 1 heavy-duty truck standards. CARB amended the Tractor-Trailer Greenhouse Gas Regulation in 2019 (Phase 2 standards) to align with EPA and NHTSA Phase 2 heavy-duty truck standards. As stated above, EPA has repealed all light-medium- and heavy-duty vehicle GHG standards, including the Phase 1 and Phase 2 medium- and heavy-duty truck standards.

- Advanced Clean Trucks. The Advanced Clean Trucks regulation was adopted by CARB on April 28, 2023. The Advanced Clean Trucks regulation sets requirements for the transition of diesel trucks and vans to zero-emission trucks, which began in 2024. The regulation required manufacturers who certify Class 2b-8 chassis or complete vehicles with combustion engines to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. As stated above, Public Law 119-15, enacting House Joint Resolution 87, was signed into law to nullify EPA's grant of a waiver to California allowing it to enforce stricter emissions standards for heavy-duty vehicles under the CAA. In response to these federal actions, CARB adopted the Emergency Vehicle Emissions Regulations as a temporary measure to retain enforcement of its medium- and heavy-duty vehicle standards.

- Advanced Clean Fleets. CARB's 2022 Advanced Clean Fleets regulation was developed to reduce diesel particulate matter by transitioning medium- and heavy-duty trucks to full electric by 2045. In January 2025, California withdrew its request for a waiver and authorization for the addition of the Advanced Clean Fleets regulation to its emissions control program (CARB 2025b). CARB is not enforcing the existing portions of the Advanced Clean Fleets regulation that would require a federal waiver or authorization, such as the portions of the

Advanced Clean Fleet regulation that apply to high-priority and drayage fleets. However, elements of the Advanced Clean Fleets regulation that do not require a federal waiver or authorization, such as the mandates for state and local government fleets to transition to fully electric by 2045 are still being enforced. (CARB 2025c).

Renewable Energy

- **Renewables Portfolio Standard**. SB 1078 (introduced by Senator Byron Sher in 2002) established California's RPS. The program continuously sets escalating renewable energy procurement requirements for the state's load-serving entities. Generation must be procured from RPS-certified facilities. SB 2 (1X) of 2011 obligated all California electricity providers to obtain at least 33 percent of their energy from renewable resources by 2020. CPUC and CEC are jointly responsible for implementing the program. All electricity retail sellers had an interim target between compliance periods to serve at least 38.5 percent of their load with RPS-eligible resources by December 31, 2022. In general, retail sellers either met or exceeded the interim 38.5 percent target and are on track to achieve their compliance requirements. In 2018, SB 100 (Public Utilities Code Sections 399.11, 399.15, 399.30, and 454.53) was signed into law, which again increases the RPS to 60 percent by 2030 and requires all the state's electricity to come from renewable and carbon-free resources by 2045.
- **SB 350 (Chapter 547, Statutes of 2015)**. SB 350 established the 2030 targets for the RPS and required CPUC to establish an integrated resource planning process to require that load-serving entities in the state develop their future energy portfolios to align with California's clean energy goals.
- **SB 100 (Chapter 312, Statutes of 2018)**. Established a new RPS target of 50 percent by 2026, increased the RPS target in 2030 from 50 to 60 percent, and established a goal of 100 percent zero-carbon energy sources by 2045.
- **SB 1020 (Chapter 361, Statutes of 2022)**. Superseded the goals of SB 100 by requiring that 90 percent of all retail sales of electricity to California end-use customers be procured from renewable energy and zero-carbon resources by December 31, 2035. The requirement increases to 95 percent by December 31, 2040, and to 100 percent by December 31, 2045.
- **Integrated Energy Policy Report.** Pursuant to SB 1389 (Chapter 568, Statutes of 2002) CEC adopts an Integrated Energy Policy Report (IEPR) every 2 years and an update every other year. The 2025 IEPR contains an assessment of major energy trends and issues in California's electricity, natural gas, and transportation fuel sectors. The report provides policy recommendations to conserve resources; protect the environment, ensure reliable, secure, and diverse energy supplies; enhance the state's economy; and protect public health and safety including the accelerated connection of clean energy, the California Energy Demand Forecast, the potential growth of hydrogen in the state, and updates to issues such as energy efficiency, gas utility decarbonization, and the Clean Transportation Program (CEC 2025a). The 2025 IEPR planning forecast and local reliability scenario projects initially lower near-term growth in annual energy sales compared to the previous forecasts as well as slightly lower near term growth in peak demand compared to the previous forecast. However, for peak demand, the lower near-term growth is offset by a weather-normal estimate of 2025 peak load that is higher than previously forecast (CEC 2025a)

Building Efficiency

- **California Building Energy Efficiency Standards.** The energy consumption of new residential and nonresidential buildings in California is regulated by the California Energy Code's Building Energy Efficiency Standards (California Energy Code) (24 CCR Part 6). CEC updates the California Energy Code every three years and typically incorporates more stringent design requirements for reduced energy consumption into each update. The 2025 Building Energy Efficiency Standards (2025 California Energy Code) became effective on January 1, 2026. According to CEC, the 2025 California Energy Code expands upon prior requirements for electric-ready appliances and solar photovoltaic (PV) systems and puts particular emphasis on encouraging efficient electric heat pump technology for space and water heating in newly constructed single-family, multifamily, and select nonresidential building types; replacing end-of-life rooftop heating, ventilation, and air-conditioning units of a certain size with high-efficiency systems; establishing electric-ready requirements for commercial kitchens and some multifamily buildings; updating solar and storage standards for assembly buildings to make clean energy available for on-site use while minimizing exports to the electrical grid; and increasing ventilation standards to improve indoor air quality in multifamily buildings. On June 30, 2025, the governor signed AB 130, which

institutes a 6-year freeze on updates to state and local residential building standards, through 2031, with exceptions only for emergency measures, energy/fire safety, accessibility, and wildland-urban code updates. During this period, local jurisdictions may not adopt new residential building code amendments unless they are confirmed by the Building Standards Commission as emergency standards to protect health and safety. The law also guarantees that builders may use the same building codes that were in effect when model-homes were approved for up to 10 years or when the project is complete, whichever comes first unless the builder substantially changes the building design during that period. This provision ensures long-term planning stability and guards against sudden code shifts.

- **California Green Building Standards Code.** California has adopted the Green Building Standards Code (CALGreen Code) (24 CCR Part 11), which identifies both mandatory and voluntary aggressive energy efficiency standards for new residential and nonresidential buildings. The standards are updated every three years. The current version is the 2025 CALGreen Code effective January 1, 2026. The 2025 version proposes increased requirements for EV charging infrastructure (i.e., a higher percentage of parking spaces that must be equipped with EV chargers and more stringent requirements for the types of chargers that must be installed) in both residential and nonresidential buildings. The 2025 CALGreen Code also includes required analysis of embodied carbon in building materials, and includes updates to energy efficiency standards aimed at further reducing energy consumption in buildings and promoting the use of renewable energy sources (CEC 2024). As discussed above, AB 130 freezes the residential building code, including the CALGreen Code, until 2031; however, the requirements of the 2025 nonresidential CALGreen Code will be applied to new nonresidential development effective January 1, 2026.
- **AB 130:** AB 130 of 2025 imposes a moratorium on changes to California building codes affecting residential units, including both state and local amendments, through 2031, with limited exemptions. AB 130 prohibits any adopting agency from considering, approving, or adopting any proposed building standards affecting residential units, unless the California Building Standards Commission deems those changes necessary as emergency standards to protect health and safety. The 2025 Energy Code will proceed as planned with an effective date of January 1, 2026, and the 2031 Energy Code cycle is anticipated to be unaffected.

California Energy Commission

- **Warren-Alquist Act**. The 1975 Warren-Alquist Act established the California Energy Resources Conservation and Development Commission, now known as the CEC. The act established a statewide policy to reduce wasteful, uneconomical, and unnecessary uses of energy by employing a range of measures. CEC is responsible for the certification of electrical generation facilities as eligible renewable energy resources and adopting regulations for the enforcement of RPS procurement requirements of publicly owned utilities, whereas CPUC implements and administers RPS compliance rules for California's retail sellers of electricity, which include large and small investor-owned utilities, electric service providers, and community choice aggregators.
- **State of California Energy Action Plan**. CEC is responsible for preparing the state energy plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The current plan is the 2003 California Energy Action Plan (2008 update). The plan calls for the state to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero-emission vehicles and addressing their infrastructure needs, and encouragement of urban design that reduces VMT and accommodates pedestrian and bicycle access.
- **California Energy Efficiency Action Plan.** CEC updates its plan to increase energy efficiency in existing buildings every 3 years. The 2025 California Building Energy Action Plan (2025 Energy Action Plan) updates statewide strategies for existing building decarbonization. The 2025 Energy Action Plan presents a statewide, multiagency perspective on ways to achieve greater decarbonization of existing buildings through improved energy efficiency, electrification, and supporting strategies. The 2025 Energy Action Plan fulfills the mandates in California Public Resources Code Sections 25310(c), 25403(c), and 25943(f) and incorporates the status report on CEC's Equitable Building Decarbonization program, required by Senate Bill 306 (Caballero, Chapter 387, Statutes of 2023), as an appendix.

California State University Sustainability Policy

In the spring of 2022, the California State University (CSU) Board of Trustees adopted an update to the CSU system-wide Sustainability Policy, which was first adopted in 2014 with subsequent updates in 2019 and 2020. The current update became effective March 23, 2022 and reviewed in 2024 (CSU 2024). The policy aims to reduce the environmental impact of construction and operation of buildings and to integrate sustainability across the curriculum. The CSU Sustainability Policy established the following goals that either directly, or indirectly (e.g., reductions in GHG emissions result in reduced energy use), relate to energy efficiency and would be applicable to the proposed project:

Climate Action Plan

- The CSU will strive to reduce systemwide facility carbon emissions to 40 percent below 1990 levels consistent with SB 32, California's Global Warming Solutions Act of 2006 (HSC §38566, effective January 1, 2017). Emissions will include both state and auxiliary organization purchases of electricity and natural gas; fleet, marine vessel usage; and other emissions the university or self-support entity has direct control over. The Chancellor's Office staff will provide the baseline 1990 facility emission levels (for purchased electricity and natural gas) for the campuses that existed at that time and assist campuses added to the CSU after 1990 to determine their appropriate baseline.
- The CSU will strive to reduce facility carbon emissions to 80 percent below 1990 levels by 2040 to achieve carbon neutrality by 2045 in accordance with statewide mandates. Metrics will include GHG emissions per FTE.

Energy Resilience and Procurement

- The CSU will pursue energy procurement and production to reduce energy capacity requirements from fossil fuels, enhance electrical demand flexibility, and promote energy resilience using available economically feasible technology for on-site renewable generation, microgrids, and other fossil fuel-free energy storage solutions. The CSU shall endeavor to increase its self-generated renewable energy and battery capacity from 32 to 80 megawatts by 2030.
- The CSU will consider cost effective opportunities to exceed the State of California and California Public Utilities Commission Renewable Portfolio Standard sooner than the established goal of procuring 60 percent of its electricity needs from renewable sources by 2030 consistent with SB 100 (PUC Section 399.11).
- To minimize use of natural gas, campuses will transition from fossil-fuel sourced equipment to electric equipment as replacements or renovations are needed. Any in-kind fossil-fuel sourced equipment will be justified through an analysis which demonstrates why that solution represents the most cost-effective option and what alternatives were analyzed for comparative purposes. The intention of this item shall be limited to no new investment in, or renewal of, natural gas assets or infrastructure as part of campus projects starting July 1, 2035, with the exception of critical academic program needs.

Energy Conservation, Carbon Reduction and Utility Management

- All CSU buildings and facilities, regardless of the source of funding for their operation, will be operated in the most energy efficient manner and transition to a low carbon strategy without endangering public health and safety and without diminishing the quality of education and the academic program.
- All CSU campuses shall continue to identify energy efficiency and carbon reduction improvement measures to the greatest extent possible, undertake steps to seek funding for their implementation and, upon securing available funds, expeditiously implement the measures.
- The CSU will cooperate with federal, state, and local governments and other appropriate organizations in accomplishing energy conservation, and carbon reduction, and utilities management objectives throughout the state; and inform students, faculty, staff and the general public of the need for and methods of energy conservation, and carbon reduction, and utilities management.
- The CSU will monitor monthly energy and utility usage on all campuses and the Chancellor's Office and will prepare a systemwide annual report on energy utilization and greenhouse gas emissions. The Chancellor's Office will maintain a systemwide energy database in which monthly campus data will be compiled to produce systemwide energy reporting. Campuses will provide the Chancellor's Office the necessary energy and utility

data, such as electricity and natural gas consumption; water and sewer usage; fuel consumed by fleet vehicles, boats, and ships; waste disposal for the systemwide database in a timely manner.

- Each CSU campus shall develop and maintain a campuswide utility master plan which includes an integrated strategic energy resource plan, with tactical recommendations in the areas of new construction, decarbonization, deferred maintenance, climate resilience, facility renewal, energy projects, water conservation, solid waste management, and an energy management plan. This plan will be updated every 10 years and guide the overall energy and climate action program at each campus.

Sustainable Building & Lands Practices

- All future CSU new construction, remodeling, renovation, and repair projects, regardless of funding source, will be designed with consideration of optimum energy utilization, decarbonization, and low life-cycle operating costs and shall exceed all applicable energy codes and regulations (Building Energy Efficiency Standards, Tit. 24 CCR Section 6) by ten percent. In the areas of specialized construction that are not regulated through the current energy standards, such as historical buildings, museums, and auditoriums, the CSU will ensure that these facilities are designed to maximize energy efficiency. Energy efficient and sustainable design features in the project plans and specifications will be considered in balance with the academic program needs of the project within the available project budget.
- Capital planning for state, non-state facilities and infrastructure shall consider features of a sustainable and durable design to achieve a low life cycle cost. Campuses shall design, construct, operate, and maintain green building certified high performing buildings, regardless of funding source, that improve occupant productivity and wellness, optimize life-cycle costs, and minimize carbon impact. Principles and best practices established by leading industry standards or professional organizations shall be implemented to the greatest extent possible.
- Existing building energy performance will be optimized through improved operation, maintenance and repair, and capital improvement, enabling campuses to meet carbon reduction goals. Sustainable design for capital projects is a process of balancing long-term institutional needs for academic and related programs with environmental concerns. In the context of designing to provide for university and academic needs, the following attributes will be considered "sustainable:"
- Siting and design considerations that optimize local geographic features to improve sustainability of the project, such as proximity to public transportation and maximizing use of vistas, microclimate, and prevailing winds;
    - Durable systems and finishes with long life cycles that minimize maintenance and replacement.
    - Optimization of layouts and designing spaces that can be reconfigured with the expectation that the facility will be renovated and re-used (versus demolished);
    - Systems designed for optimization of energy, water, and other natural resources;
    - Optimization of indoor environmental quality for occupants;
    - Utilization of environmentally preferable products and processes, such as long life-cycle materials and components, recycled-content and recyclable materials;
    - Procedures that monitor, trend, and report operational performance as compared to the optimal design and operating parameters.
    - Cost-effective design features which algin with the CSU Basic Needs Initiative and support campus diversity, equity and inclusion efforts.
- To implement the sustainable building goal in a cost-effective manner, the process will: identify economic and environmental performance measures; determine cost savings; use extended life cycle costing; and adopt an integrated systems approach. Such an approach treats the entire building as one system and recognizes that individual building features, such as lighting, windows, heating and cooling systems, or control systems are not stand-alone systems.

- The sustainability performance shall be based on Leadership in Energy and Environmental Design (LEED) principles with consideration to the physical diversity and microclimates within the CSU.
- The CSU shall design and build all new buildings and major renovations to meet or exceed the minimum requirements equivalent to LEED Silver. Each campus shall strive to achieve a higher standard equivalent to LEED Gold or Platinum within project budget constraints. Each campus may pursue external certification through the LEED process or alternative sustainable building rating systems. If the project is not registered through U.S. Green Building Council, then a qualified campus staff member shall evaluate the documentation necessary to determine LEED equivalence and shall attest that equivalence has been achieved.

Sustainable Building & Lands Practices

- Each campus shall operate and maintain a comprehensive energy management system that will provide centralized reporting and control of the campus energy and carbon reduction related activities.
- Campus energy/utilities managers will make the necessary arrangements to achieve optimum efficiency in the use of natural gas, electricity, or any other purchased energy resources to meet the heating, cooling, and lighting needs of the buildings and/or facilities. Campuses shall strive to adhere to statewide energy efficiency guidance regarding appropriate indoor temperature setpoints during heating and cooling periods (State Administrative Manual, Section: 1805.3). Except for areas requiring special operating conditions, such as electronic data processing facilities, or other scientifically critical areas, where rigid temperature controls are required, building and/or facility temperatures will be allowed to fluctuate between the limits stated above. Simultaneous heating and cooling operations to maintain a specific temperature in work areas will not be allowed unless special operating conditions dictate such a scheme to be implemented.
- To the extent possible, academic and non-academic programs will be consolidated in a manner to achieve the highest building utilization.
- All CSU campuses shall implement a utilities chargeback system to recover direct and indirect costs of utilities provided to self-supporting and external organizations pursuant to procedures in the CSU Policy Library.

Transportation

- The CSU will encourage and promote the use of alternative transportation and/or alternative fuels to reduce GHG emissions related to university associated transportation, including commuter and business travel. The Chancellor's Office will establish a baseline for carbon emissions from student, faculty and staff commuting and establish a systemwide reduction target.
- All CSU campuses shall develop and maintain a transportation demand management (TDM) plan to reduce vehicle miles traveled (VMT) and carbon emissions. This plan will be updated every 5 years and guide the overall transportation and parking program at each campus.
- Campuses shall strive to increase EV, electric bicycle, and other electric mobility and transportation device charging infrastructure and incentive programs to further support campus carbon reduction strategies.
- Campuses shall strive to develop and maintain a long-range plan for transitioning fleet, and grounds equipment to zero emissions, excluding public safety patrol vehicles if necessary. 50 percent of all light duty vehicle purchases will be ZEV by 2035, with no addition of gas-powered light duty vehicles to the fleet after 2035. All small off-road engine equipment used for campus grounds will be all-electric by 2035. All buses and heavy-duty vehicles will be ZEV by 2045 in alignment with state regulations.

Energy Use Index

Energy use is the primary metric used by the CSU to track progress toward energy conservation goals, referred to as the Energy Use Index (EUI). EUI represents total annual electricity and natural gas use per square foot of building space, measured in British thermal units per square foot. To normalize this metric between different CSU campuses, the square footage is adjusted to prorate or remove buildings and structures that are very low or zero energy users, such as parking structures, stadiums, and farm buildings such as barns and storage sheds. The last two CSU Executive

Orders on energy and sustainability (i.e., 917 of 2004, 987 of 2006) established goals to reduce British thermal units per square foot by 15 percent over two consecutive 5-year periods.

LOCAL

The buildings on the project site are located on State-owned property and would be demolished by the Department of General Services (DGS) and subsequent development is presumed to be undertaken by the California State University, Sacramento (Sacramento State), another State agency. As explained in Section 4.2, "Land Use and Planning," of this Draft EIR, under Section 4.2.1, "Local," state agencies are not subject to local plans, policies, and zoning regulations. Regarding local plans, policies, and zoning regulations, in the exercise of its discretion, DGS does reference, describe, and address local plans, policies, and regulations that may be applicable to the project. This evaluation is also intended to be used by local agencies for determining, as part of their permit processes, the project's consistency with local plans, policies, and regulations.

City of Sacramento General Plan

The City of Sacramento 2040 General Plan is the City's policy guide for future development. The 2040 General Plan establishes land uses which apply to the project area along with policies that guide development, design, and urban form. While the 2040 General Plan contains policies relating to the use, conservation, and procurement of energy, they are primarily implemented by the City at a citywide scale rather than at the individual project level.

City of Sacramento New Building Electrification

On November 29, 2022, the Sacramento City Council adopted a new building electrification ordinance. After adoption of the new building electrification ordinance, a decision of the United States Court of Appeals for the Ninth Circuit (the "Ninth Circuit") reversing a United States District Court decision in the California Restaurant Association v. City of Berkeley case made the new building electrification ordinance unenforceable. The Ninth Circuit determined that Berkeley's new building electrification ordinance was preempted by the federal Energy Policy and Conservation Act (EPCA). This decision impacts similar ordinances throughout the Ninth Circuit, including Sacramento's. Because of this decision, the City is not enforcing its ordinance prohibiting natural gas installation in all new construction. Still, the vast majority of permit applications are for all-electric construction. As all-electric is cost-effective for the majority of new construction and typically yields bill savings in Sacramento, it is anticipated that this trend is likely to continue. It is expected that market forces and City encouragement would achieve at least 75 percent of the relevant goal (i.e., reduction of GHG emissions), and savings can be achieved through other City efforts to make up the difference. The City will continue to make every good faith effort on each project to achieve CAAP goals by electrification preferably. It is expected that CAAP remains qualified per California Code of Regulation Title 14 Section 15183.5.

4.8.2 Environmental Setting

ENERGY FACILITIES AND SERVICES IN THE PROJECT AREA

Electric services are provided to the project area by the Sacramento Municipal Utility District (SMUD). Natural gas service is provided by Pacific Gas and Electric Company (PG&E).

ENERGY TYPES AND SOURCES

California relies on a regional power system composed of a diverse mix of natural gas, renewable, hydroelectric, and nuclear generation resources. Natural gas makes up one-third of energy commodities consumed in California. In 2024, SMUD, who supplies electricity to Sacramento County residents, provided its customers with 40 percent eligible renewable energy (i.e., biomass combustion, geothermal, small scale hydroelectric, solar, and wind), with 22 percent and 38 percent sourced from large-scale hydroelectric and natural gas, respectively (CEC 2026). The contribution of in- and out-of-State power plants depends on the precipitation that occurred in the previous year, the corresponding

amount of hydroelectric power that is available, and other factors. In 2024, Sacramento County consumed a total of 11,381 gigawatt hours (GWh) of electricity. Of this total, 52 percent was consumed by the nonresidential sector, while the remaining 47 percent was consumed by the residential sector (CEC 2026a). In the same year, Sacramento County consumed a total of 285 million therms of natural gas provided by PG&E. Of this total, 37 percent was consumed by the nonresidential sector, while 63 percent was consumed by the residential sector (CEC 2026b).

ALTERNATIVE FUELS

A variety of alternative fuels are used to reduce demand for petroleum-based fuel. The use of these fuels is encouraged through various statewide regulations and plans (e.g., Low Carbon Fuel Standard, AB 32 Scoping Plan). Conventional gasoline and diesel may be replaced (depending on the capability of the vehicle) with many transportation fuels, including:

- biodiesel,
- electricity,
- ethanol (E-10 and E-85),
- hydrogen,
- natural gas (methane in the form of compressed and liquefied natural gas),
- propane,
- renewable diesel (including biomass-to-liquid),
- synthetic fuels, and
- gas-to-liquid and coal-to-liquid fuels.

California has a growing number of alternative fuel vehicles (AFVs) through the joint efforts of CEC, CARB, local air districts, the federal government, transit agencies, utilities, and other public and private entities. As of August 2026, the City of Sacramento contains approximately 500 alternative fueling stations (AFDC 2026).

ENERGY USE FOR TRANSPORTATION

On-road vehicles use about 90 percent of the petroleum consumed in California. CEC reported retail sales of 469 million gallons of gasoline and 41 million gallons of diesel in Sacramento County in 2024 (the most recent data available) (CEC 2025b).

ENERGY USE AND CLIMATE CHANGE

Scientists and climatologists have produced evidence that the burning of fossil fuels by vehicles, power plants, industrial facilities, residences, and commercial facilities has led to an increase of the earth's temperature. For an analysis of GHG production and the project's impacts on climate change, see Section 4.7, "Greenhouse Gas Emissions and Climate Change."

4.8.3 Impacts and Mitigation Measures

METHODOLOGY

Appendix F of the State CEQA Guidelines requires consideration of the energy implications of a project. CEQA requires mitigation measures to reduce "wasteful, inefficient, and unnecessary" energy usage (PRC Section 21100[b][3]). Neither the law nor the State CEQA Guidelines establish criteria that define wasteful, inefficient, or unnecessary use. Therefore, impacts related to energy are addressed qualitatively. This analysis utilizes modeling methods and data from Sections 4.6, "Air Quality," and 4.7, "Greenhouse Gas Emissions and Climate Change." See Appendix C for the associated modeling details.

Levels of demolition-, construction-, and operation-related energy consumption by the project are measured in megawatt-hours of electricity, therms of natural gas, gallons of gasoline, and gallons of diesel fuel. Energy

consumption estimates were calculated using the California Emissions Estimator Model (CalEEMod) version 2022.1.1.45 computer program. Where project-specific information was not known, CalEEMod default values based on the project's location were used.

For the purposes of this analysis it was assumed that abatement and demolition activities would begin in 2027 and occur for 18 months. Construction of future development would begin in 2030 and be completed by the end of 2039. The gap between the end of building demolition and the beginning of new building construction is to allow for CEQA documentation for the new development to be completed. For the purposes of this analysis it is assumed that construction would include development of approximately 3,630,000 gross square feet (gsf) of building space. Portions of the new development would become operational during the construction period, but operation of all project facilities would not occur until construction is assumed to be complete at the end of 2039.

Table 4.8-1 summarizes the levels of energy consumption for abatement and demolition. Table 4.8-2 summarizes energy consumption for construction. Table 4.8-3 summarizes the annual levels of energy consumption at full buildout at the end of 2039.

THRESHOLDS OF SIGNIFICANCE

The following significance criteria are based on CEQA Guidelines Appendix F (energy), under which an energy impact is considered significant if implementation of the Capitol Mall Office Buildings Demolition Project would do any of the following:

- result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation; or
- conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

As stated above, Appendix G of the State CEQA Guidelines requires the consideration of the energy implications of a project. CEQA requires mitigation measures to reduce "wasteful, inefficient and unnecessary" energy usage (Public Resources Code Section 21100, subdivision (b)(3)). Neither the law nor the State CEQA Guidelines establish criteria that define wasteful, inefficient, or unnecessary use. Compliance with current California Energy Code standards for building energy efficiency and future updates to the standards would result in energy-efficient buildings developed through implementation of the project. This analysis considers all energy uses associated with the project.

ISSUES NOT DISCUSSED FURTHER

All issues relating to energy are discussed in the following analysis.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 4.8-1: Wasteful, Inefficient, or Unnecessary Consumption of Energy, During Project Demolition, Construction, or Operation

Building abatement and demolition would occur for 18 months, starting in 2027. Construction activities associated with future development would occur starting in 2030 and conclude in 2039. Only the amount of fuel necessary to complete the demolition and construction phases would be used and energy consumption for these activities would cease with the conclusion of the respective phases. During operations, future development would increase development density in an area that already falls below per-capita VMT thresholds and is served by nearby existing transit systems, supporting efficient travel patterns and reduced transportation-related energy demand. Thus, the project would not result in the wasteful, inefficient, or unnecessary use of energy and impacts would be **less than significant**.

Demolition

Energy would be required to operate and maintain construction equipment and to transport materials to and from the project site during abatement and demolition activities. The one-time energy expenditure required for abatement and demolition of the existing structures would be nonrecoverable. Most energy consumption would result from operation of construction equipment and vehicle trips associated with commutes by construction workers and haul trucks moving materials off-site. Table 4.8-1 provides an estimate of fuel needed for abatement and demolition activities associated with the project.

Table 4.8-1 Abatement and Demolition Energy Consumption

Fuel Type	Gallons
Diesel (equipment and vendor/haul trucks)	70,554
Gasoline (on-road worker vehicles)	1,953

Source: Calculations by Ascent in 2026.

Although abatement and demolition activities would require fuel and other energy sources, increases of fuel and energy uses would be temporary. Abatement and demolition contractors strive to complete projects in an efficient manner to meet project schedules and minimize cost (to maximize their profitability). Thus, only the necessary amount of fuel would be consumed.

Future Development

Construction

Similar to project demolition, energy would be required to operate and maintain construction equipment and to transport materials to and from the project site during construction activities related to implementation of future development. The one-time energy expenditure required to construct future development would be nonrecoverable. Most energy consumption would occur from operation of construction equipment and vehicle trips associated with commutes by construction workers and haul trucks moving materials off-site. Table 4.8-2 provides an estimate of fuel needed for construction activities associated with future development.

Table 4.8-2 Future Development Construction Energy Consumption

Fuel Type	Gallons
Diesel (equipment and vendor/haul trucks)	641,353
Gasoline (on-road worker vehicles)	459,792

Source: Calculations by Ascent in 2026.

Although construction activities would require fuel and other energy sources, increases of fuel and energy uses would be temporary. Construction contractors strive to complete projects in an efficient manner to meet project schedules and minimize cost (to maximize their profitability). Thus, only the necessary amount of fuel would be consumed.

Operations

Any future development under the project would, at a minimum, be built to meet the 2025 California Energy Code requirements. The 2025 California Energy Code requires the use of efficient electric heat pumps, establishes electric-ready requirements for new residences, expands solar PV and battery storage standards, and strengthens ventilation standards (CEC 2024). All buildings that could be developed under the project would be required to comply with the California Energy Code standards for building energy efficiency.

In addition, if CSU is the recipient of the project site and development is implemented by Sacramento State University, new development and campus operations would be subject to the CSU Sustainability Policy. The policy calls for, among other measures, improving energy efficiency, expanding on-site renewable-energy generation, increasing the use of lower-carbon purchased energy, sustainable energy procurement, and reducing water and waste-related emissions.

Operation of future development could involve the use of energy for activities such as vehicle trips to and from the project site, landscaping, and building operations (e.g., appliances, lighting, heating, and air conditioning). Specifically, buildings would use electricity and potentially natural gas for some specialized uses to power appliances. However, as discussed under "Methodology," AB 130 enacts restrictions on modifications to future iterations of the California Building Standards Code for residential development until 2031. Therefore, all residential energy consumption estimates provided in this analysis are inherently conservative (i.e., would not underestimate energy consumption) due to CalEEMod's default energy consumption rates and efficiency assumptions being based on the older 2019 Energy Code. Any residential development constructed to the standards of the more stringent 2025 Energy Code, or any subsequent codes implemented after 2031, would be more efficient than what is accounted for in this analysis. For this analysis, it is assumed that future development would include natural gas connections.

Table 4.8-3 summarizes the project's annual operational energy needs at full buildout. For a list of assumptions related to operational energy, see Appendix C.

Table 4.8-3 Annual Operational Energy Consumption at Full Buildout

Land Use/Energy Type	Energy Consumption	Units
Mobile	3,238,567	Gallons/year
Electricity	52,315	MWh/year
Natural Gas	32,462	MMBTU/year

Notes: MWh/year = megawatt-hours per year; MMBTU = million British thermal units.

Source: Calculations prepared by Ascent in 2026.

As identified in Section 4.2, "Land Use and Planning," future development would support infill development, intensify uses on underutilized sites near transit, increase opportunities for pedestrian and bicycle use, and locate housing closer to jobs. These features would support the feasibility of using alternate modes of transportation such as biking, walking, and public transit. As explained in Section 4.4, "Transportation and Circulation," the increase in land use diversity and population density near existing transit (i.e., the entire project site is within 0.5 mile of multiple SacRT light rail transit stations) would maintain the existing low per capita VMT and per employee VMT conditions in the project area compared to the Sacramento region. As identified in Section 4.4, the project site is in an area that currently generates work VMT per employee that is 16 percent below the regional average and household VMT per capita that is 28 percent below the regional average. Thus, future development would maintain, at a minimum, and could increase energy efficiency compared to existing conditions by increasing development density in an already low-VMT area that is supported by existing transit nearby.

Summary

Only the amount of fuel necessary to complete the demolition and construction phases would be used and energy consumption for these activities would cease with the conclusion of the respective phases. During operations, future development would increase development density in an area that already falls below per-capita VMT thresholds and is served by nearby existing transit systems, supporting efficient travel patterns and reduced transportation-related

energy demand. Thus, the project would not result in the wasteful, inefficient, or unnecessary use of energy and consumption impacts would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.8-2: Conflict with or Obstruct a State or Local Plan for Renewable Energy or Energy Efficiency

The CSU Sustainability Policy contains a variety of measures and actions to reduce energy consumption and GHG emissions and increase energy efficiency, such as achieving an 80 percent reduction in GHG emissions below 1990 levels by 2040 and carbon neutrality by 2045 and a target date to disinvest in natural gas assets or infrastructure starting on July 1, 2035, with the exception of critical academic program needs. The CSU Sustainability Policy also encourages the deployment of EV infrastructure, electric bicycle and other mobility strategies to encourage zero-emission transportation options. Due to the lack of available details regarding the project design, it is not known at this time if the project design would comply entirely with the CSU Sustainability Policy, such as including all-electric development or sufficient EV charging equipment. Because of this uncertainty, a determination of full consistency with the CSU Sustainability Policy cannot be confirmed. This impact would be **potentially significant**.

This analysis assumes that development of new uses on the project site would be completed by Sacramento State. As such, the plan related to renewable energy or energy efficiency applicable to future development would be the CSU Sustainability Policy. As described above in the "Regulatory Setting," the CSU Sustainability Policy includes numerous sustainability, renewable energy, and energy conservation measures, such as:

- achieving an 80 percent reduction in GHG emissions below 1990 levels by 2040 and carbon neutrality by 2045;
- disinvesting in natural gas assets or infrastructure starting on July 1, 2035, with the exception of critical academic program needs;
- encouraging the deployment of EV infrastructure, electric bicycle and other mobility strategies to encourage zero-emission transportation options;
- promoting onsite clean energy use, generation, and storage via battery capacity;
- exceeding all applicable energy codes and regulations (Building Energy Efficiency Standards, Tit. 24 CCR Section 6) by ten percent; and
- meeting or exceeding the minimum requirements equivalent to LEED Silver.

As stated in Chapter 3, "Project Description," the University is in early stages of developing a program for the site and intends to eventually prepare a master plan development proposal for a Downtown Sacramento campus of Sacramento State. While a future development scenario is provided in Chapter 3 to support identification and disclosure of probable environmental effects of future development, it does not provide the level of design detail that would be included in a master plan development disposal. Therefore, while it is reasonable to presume that CSU and Sacramento State would design and implement the Downtown Sacramento campus to be consistent with the CSU Sustainability Policy, it cannot be assured at this time that all elements of the Policy would be complied with. For example, there is no data at this time related to the capacity of the project development to support clean energy generation or battery storage or if the target of exceeding applicable energy codes by 10 percent can be met. It is also uncertain at this time whether project development would sufficiently constrain the use of natural gas or provide sufficient EV charging equipment to meet applicable policies. There also has not been sufficient study to determine whether elements of the project site, surrounding development, the urban setting, or local utility infrastructure might constrain the ability to fully comply with all elements of the CSU Sustainability Policy. Although it is unlikely that the proposed Downtown Sacramento campus would not be consistent with the CSU Sustainability Policy, based on currently available information, it cannot be assured at this time that some conflict with the policy may not occur. Therefore, this impact would be **potentially significant**.

Mitigation Measures

Mitigation Measure 4.8-2: Document Campus Master Plan Consistency with the CSU Sustainability Policy

As the Master Plan is being prepared for the Downtown Sacramento campus, include design elements and plan features that result in consistency with all applicable elements of the CSU Sustainability Policy. Validate consistency with the CSU Sustainability Policy in the CEQA analysis prepared for the Master Plan. CSU shall only approve the Master Plan if it is determined to be consistent with CSU Sustainability Policy.

Significance after Mitigation

Implementation of Mitigation Measure 4.8-2 would result in the Downtown Sacramento campus Master Plan, when developed, identifying a campus that would be consistent with the CSU Sustainability Policy. This consistency would be reviewed and validated as part of the CEQA analysis of the Master Plan and the validation would be a component of plan approval. Thus, with the implementation of Mitigation Measure 4.8-2 the project would align with the building energy efficiency goals of the CSU Sustainability Policy. This impact would be **less than significant with mitigation**.

4.9 NOISE AND VIBRATION

This section includes a summary of applicable regulations related to noise and vibration, a description of ambient noise conditions, and an analysis of potential short-term construction and long-term operational-source noise impacts associated with the Capitol Mall Office Buildings Demolition Project. Mitigation measures are recommended as necessary to reduce significant noise impacts. Additional data is provided in Appendix D.

No comments regarding noise or vibration were received in response to the Notice of Preparation (see Appendix A).

4.9.1 Common Noise Descriptors

Noise in our daily environment fluctuates over time. Various noise descriptors have been developed to describe time-varying noise levels. The following noise descriptors are used in this section and provided at the beginning of the analysis to assist in understanding subsequent sections:

- **Equivalent Continuous Sound Level (L_{eq}):** L_{eq} represents an average of the sound energy occurring over a specified period. In effect, L_{eq} is the steady-state sound level that contains the same acoustical energy as the time-varying sound level over the same period (Caltrans 2013: 2-48). For instance, the 1-hour equivalent sound level, also referred to as the hourly L_{eq}, is the energy average of sound levels occurring during a 1-hour period and is the basis for noise abatement criteria used by the California Department of Transportation (Caltrans) and Federal Transit Administration (FTA) (Caltrans 2013: 2-47; FTA 2018: 10).
- **Maximum Sound Level (L_{max}):** L_{max} is the highest instantaneous sound level measured during a specified period (Caltrans 2013: 2-48; FTA 2018: 10).
- **Day-Night Level (L_{dn}):** L_{dn} is the energy average of A-weighted sound levels occurring over a 24-hour period, with a 10-decibel (dB) "penalty" applied to sound levels occurring during nighttime hours between 10 p.m. and 7 a.m. (Caltrans 2013: 2-48; FTA 2018: 10).
- **Community Noise Equivalent Level (CNEL):** CNEL is the energy average of the A-weighted sound levels occurring over a 24-hour period, with a 10 dB penalty applied to sound levels occurring during the nighttime hours between 10 p.m. and 7 a.m. and a 5 dB penalty applied to the sound levels occurring during evening hours between 7 p.m. and 10 p.m. (Caltrans 2013: 2-48).

4.9.2 Regulatory Setting

FEDERAL

Federal Transit Administration

To address the human response to ground vibration, FTA has established guidelines for maximum-acceptable vibration criteria for various land use types. These guidelines are presented in Table 4.9-1.

Table 4.9-1 Ground-Borne Vibration Impact Criteria for General Assessment

Land Use Category	GVB Impact Level (VdB re 1 microinch/second) for Frequent Events[1]	GVB Impact Level (VdB re 1 microinch/second) for Occasional Events[2]	GVB Impact Level (VdB re 1 microinch/second) for Infrequent Events[3]
Category 1: Buildings where vibration would interfere with interior operations	65[4]	65[4]	65[4]
Category 2: Residences and buildings where people normally sleep	72	75	80
Category 3: Institutional land uses with primarily daytime uses	75	78	83

Notes: GVB = ground-borne vibration; VdB = vibration decibels referenced to 1 microinch per second and based on the root mean square (RMS) velocity amplitude.

[1] "Frequent events" is defined as more than 70 vibration events of the same source per day.

[2] "Occasional events" is defined as between 30 and 70 vibration events of the same source per day.

[3] "Infrequent events" is defined as fewer than 30 vibration events of the same source per day.

[4] This criterion is based on levels that are acceptable for most moderately sensitive equipment, such as optical microscopes. Vibration-sensitive manufacturing or research would require detailed evaluation to define acceptable vibration levels.

Source: FTA 2018: Table 6-3.

STATE

California Department of Transportation

In 2020, Caltrans published the Transportation and Construction Vibration Manual (Caltrans 2020). The manual provides general guidance on vibration issues associated with the construction and operation of projects and their relation to structural damage. Table 4.9-2 presents recommendations for vibration levels that could damage structures exposed to continuous vibration.

Table 4.9-2 Caltrans' Guideline Vibration Damage Potential Threshold Criteria

Structure and Condition	Maximum PPV (in/sec)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

Note: PPV = peak particle velocity; in/sec = inches per second.

Transient sources create a single isolated vibration event, such as blasting. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment

Source: Caltrans 2020.

LOCAL

The buildings on the project site are located on State-owned property and would be demolished by the California Department of General Services (DGS) and subsequent development is presumed to be undertaken by the California State University, Sacramento (Sacramento State), another State agency. As explained in Section 4.2, "Land Use and Planning," of this Draft EIR, under Section 4.2.1, "Local," state agencies are not subject to local plans, policies, and

zoning regulations. Nevertheless, in the exercise of its discretion, the DGS references, describes, and addresses in this EIR local plans, policies, and regulations that may be applicable to the project. This evaluation is also intended to be used by local agencies for determining, as part of their permit processes, the project's consistency with local plans, policies, and regulations.

City of Sacramento 2040 General Plan

The Noise section within the Environmental Resources and Constraints Element of the City of Sacramento 2040 General Plan establishes the following standards and policies that may be relevant to the analysis of the noise effects of the project:

- **Policy ERC-10.1: Exterior Noise Standards.** The City shall require noise mitigation for all development where the projected exterior noise levels exceed those shown in Table ERC-1 [*recreated here as Table 4.9-3*], to the extent feasible.

Table 4.9-3 Exterior Noise Compatibility Standards for Various Land Uses

Land Use Type	Highest Level of Noise Exposure that is Regarded as "Normally Acceptable" [a] (L_{dn} [b] or CNEL[c])
Residential—Low Density Single Family, Duplex, Mobile Homes	60 dBA[d,e]
Residential—Multi-family g	65 dBA
Urban Residential Infill h and Mixed-Use Projects I, j	70 dBA
Transient Lodging—Motels, Hotels	65 dBA
Schools, Libraries, Churches, Hospitals, Nursing Homes	70 dBA
Auditoriums, Concert Halls, Amphitheaters	Mitigation based on site-specific study
Sports Arena, Outdoor Spectator Sports	Mitigation based on site-specific study
Playgrounds, Neighborhood Parks	70 dBA
Golf Courses, Riding Stables, Water Recreation, Cemeteries	75 dBA
Office Buildings—Business, Commercial and Professional	70 dBA
Industrial, Manufacturing, Utilities, Agriculture	75 dBA

a. As defined in the Guidelines, "Normally Acceptable" means that the "specified land use is satisfactory, based upon the assumption that any building involved is of normal conventional construction, without any special noise insulation requirements."

b. L_{dn} or Day Night Average Level is an average 24-hour noise measurement that factors in day and night noise levels.

c. CNEL or Community Noise Equivalent Level measurements are a weighted average of sound levels gathered throughout a 24-hour period.

d. Applies to the primary open space area of a detached single-family home, duplex, or mobile home, which is typically the backyard or fenced side yard, as measured from the center of the primary open space area (not the property line). This standard does not apply to secondary open space areas, such as front yards, balconies, stoops, and porches.

e. dBA or A-weighted decibel scale is a measurement of noise levels.

f. The exterior noise standard for the residential area west of McClellan Airport known as McClellan Heights/Parker Homes is 65 dBA.

g. Applies to the primary open space areas of townhomes and multi-family apartments or condominiums (private yards for townhomes; common courtyards, roof gardens, or gathering spaces for multi-family developments). These standards shall not apply to balconies or small-attached patios in multistoried multi-family structures.

h. With land use designations of Central Business District, Urban Neighborhood (Low, Medium, or High), Urban Center (Low or High), Urban Corridor (Low or High).

i. All mixed-use projects located anywhere in the City of Sacramento

j. See notes d and g above for definition of primary open space areas for single-family and multi-family developments.

Source: City of Sacramento 2024: Table ERC 1.

- **Policy ERC-10.3: Interior Noise Standards.** The City shall require new development to include noise attenuation to assure acceptable interior noise levels appropriate to the land use, as follows:

- 45 dBA L_{dn} for residential, transient lodgings, hospitals, nursing homes, and other uses where people normally sleep; and
- 45 dBA L_{eq} (peak hour with windows closed) for office buildings and similar uses.

- **Policy ERC-10.5: Interior Vibration Standards.** The City shall require construction projects that are anticipated to generate significant vibration levels to use appropriate methods (i.e., type of equipment, low-impact tools, modifying operations, increasing setback distance, vibration monitoring) to ensure acceptable interior vibration levels at nearby residential and commercial uses based on the current City or Federal Transit Administration (FTA) criteria.
- **Policy ERC-10.7: Vibration.** The City shall consider the potential for vibration-induced damage associated with construction activities, highways, and rail lines in close proximity to historic buildings and archaeological sites. Where there is potential for substantial vibration-induced damage, the City shall require preparation of a Pre-Construction Survey and Vibration Management and Monitoring Plan, prepared by a qualified historic preservation specialist or structural engineer to document existing conditions, present appropriate methods to avoid or reduce potential vibration damage, monitor for excessive vibration, and ensure any damage is documented and repaired.
- **Policy ERC-10.9: Construction Noise Controls.** The City shall limit the potential noise impacts of construction activities on surrounding land uses through noise regulations in the City Code that address permitted days and hours of construction, types of work, construction equipment, and sound attenuation devices.

City of Sacramento Noise Control Ordinance

The City's Noise Control Ordinance establishes the following standards related to noise that may be applicable to the project:

8.68.060 Exterior Noise Standards

A. The following noise standards, unless otherwise specifically indicated in this article, shall apply to all agricultural and residential properties.

1. From seven a.m. to ten p.m. the exterior noise standard shall be fifty-five (55) dBA.
2. From ten p.m. to seven a.m. the exterior noise standard shall be fifty (50) dBA.

B. It is unlawful for any person at any location to create any noise which causes the noise levels when measured on agricultural or residential property to exceed, for the duration of time set forth following, the specified exterior noise standards in any one hour by (see Table 4.9-4):

Table 4.9-4 Exterior Noise Standards

Cumulative Duration of the Intrusive Sound	Allowance Decibels
Cumulative period of 30 minutes per hour	0
Cumulative period of 15 minutes per hour	+5
Cumulative period of 5 minutes per hour	+10
Cumulative period of 1 minute per hour	+15
Level not to be exceeded for any time per hour	+20

C. Each of the noise limits specified in subsection B. of this section shall be reduced by 5 dBA for impulsive or simple tone noises, or for noises consisting of speech or music.

D. If the ambient noise level exceeds that permitted by any of the first four noise limit categories specified in subsection B of this section, the allowable noise limit shall be increased in 5 dBA increments in each category to encompass the ambient noise level. If the ambient noise level exceeds the fifth noise level category, the maximum ambient noise level shall be the noise limit for that category.

8.68.070 Interior Noise Standards

A. In any apartment, condominium, townhouse, duplex or multiple dwelling unit, it is unlawful for any person to create any noise from inside his or her unit that causes the noise level when measured in a neighboring unit during the periods ten p.m. to seven a.m. to exceed:

   1. Forty-five (45) dBA for a cumulative period of more than five minutes in any hour;

   2. Fifty (50) dBA for a cumulative period of more than one minute in any hour;

   3. Fifty-five (55) dBA for any period of time.

B. If the ambient noise level exceeds that permitted by any of the noise level categories specified in subsection A of this section, the allowable noise limit shall be increased in five dBA increments in each category to encompass the ambient noise level.

8.68.080 Exemptions

The following activities shall be exempted from the provisions of this chapter:

D. Noise sources due to the erection (including excavation), demolition, alteration or repair of any building or structure between the hours of seven a.m. and six p.m., on Monday, Tuesday, Wednesday, Thursday, Friday and Saturday, and between nine a.m. and six p.m. on Sunday; provided, however, that the operation of an internal combustion engine shall not be exempt pursuant to this subsection if such engine is not equipped with suitable exhaust and intake silencers which are in good working order. The director of building inspections may permit work to be done during the hours not exempt by this subsection in the case of urgent necessity and in the interest of public health and welfare for a period not to exceed three days. Application for this exemption may be made in conjunction with the application for the work permit or during progress of the work.

4.9.3 Environmental Setting

ACOUSTIC FUNDAMENTALS

Sound, Noise, and Acoustics

Sound is mechanical energy transmitted as pressure waves through a medium, such as air, to the human ear. Noise is generally considered an unwanted or disruptive sound. Acoustics, the science of sound, focuses on how sound travels from a source to a receiver, with factors like source strength and environmental conditions (e.g., ground type, barriers) influencing what is heard.

Frequency

Continuous sound can be described by frequency (pitch) and amplitude (loudness). A low-frequency sound is perceived as having a low pitch. Frequency is expressed in cycles per second, or hertz (Hz) (e.g., a frequency of 250 cycles per second is referred to as 250 Hz). High frequencies are sometimes more conveniently expressed in kilohertz, or thousands of hertz. The audible frequency range for humans is generally between 20 Hz and 20,000 Hz.

Sound Pressure Levels and Decibels

Sound pressure, measured in micro-Pascals (mPa), reflects the amplitude of sound waves. Because humans can perceive a wide range of pressures, sound levels are expressed logarithmically in decibels (dB), making comparisons easier.

Addition of Decibels

Because the decibel scale is logarithmic, sound levels cannot be added arithmetically. Doubling sound energy results in a 3 dB increase. For instance, two identical noise sources at 70 dB each combine to produce 73 dB, not 140 dB.

A-Weighted Decibels

Human hearing is more sensitive to midfrequency sounds (1,000–8,000 Hz). To reflect this sensitivity, the A-weighted decibel (dBA) scale adjusts sound levels to account for human hearing sensitivity. Most environmental noise analyses, including this one, report sound levels in dBA. Table 4.9-5 describes typical dBA noise levels for various noise sources.

Table 4.9-5 Typical A-Weighted Noise Levels

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
—	110	Rock band
Jet flyover at 1,000 feet	100	—
Gas lawn mower at 3 feet	90	—
Diesel truck at 50 feet at 50 miles per hour	80	Food blender at 3 feet, garbage disposal at 3 feet
Noisy urban area, daytime, gas lawn mower at 100 feet	70	Vacuum cleaner at 10 feet, normal speech at 3 feet
Commercial area, heavy traffic at 300 feet	60	—
Quiet urban daytime	50	Large business office, dishwasher next room
Quiet urban nighttime	40	Theater, large conference room (background)
Quiet suburban nighttime	30	Library, bedroom at night
Quiet rural nighttime	20	—
—	10	Broadcast/recording studio
Lowest threshold of human hearing	0	Lowest threshold of human hearing

Note: dBA = A-weighted decibels.

Source: Caltrans 2013: Table 2-5.

Human Response to Changes in Noise Levels

The doubling of sound energy results in a 3 dB increase in the sound level. However, when a sound level change is measured with precise instrumentation, the subjective perception of a doubling of loudness typically differs from the measured value.

Under controlled conditions in an acoustical laboratory, the trained, healthy human ear can discern 1 dBA changes in sound levels when exposed to steady, single-frequency ("pure-tone") signals in the midfrequency range (1,000–8,000 Hz). In general, the healthy human ear is most sensitive to sounds between 1,000 and 5,000 Hz and perceives both higher- and lower-frequency sounds (i.e., outside this mid-range) of the same magnitude with lower intensity (Caltrans 2013: 2-18). In typical noisy environments, changes in noise of 1–2 dBA are generally not perceptible. However, it is widely accepted that people can detect increases in sound levels of 3 dBA in typical noisy environments. Further, a 5 dBA increase is generally perceived as distinctly noticeable, and a 10 dBA increase is generally perceived as a doubling of loudness (Caltrans 2013: 2-10). Therefore, a doubling of sound energy (e.g., doubling the volume of traffic on a highway) that would result in a 3 dBA increase in sound would generally be perceived as barely detectable.

VIBRATION FUNDAMENTALS

Vibration is the periodic oscillation of a medium or object with respect to a given reference point. Sources of vibration include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, and landslides) and those introduced by human activities (e.g., explosions, machinery, traffic, trains, and construction equipment). Vibration sources may be continuous (e.g., operating factory machinery) or transient in nature (e.g., explosions). Vibration levels can be depicted in terms of amplitude and frequency, relative to displacement, velocity, or acceleration.

Vibration amplitudes are commonly expressed in peak particle velocity (PPV) or root-mean-square (RMS) vibration velocity. PPV and RMS vibration velocity are generally described in inches per second (in/sec) or in millimeters per second. PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. It is typically

used in monitoring transient and impact vibration and has been found to correlate well with the stress experienced by buildings (FTA 2018: 110; Caltrans 2013: 6).

Although PPV is appropriate for evaluating the potential for building damage, it is not always suitable for evaluating human response. It takes some time for the human body to respond to vibration signals. In a sense, the human body responds to average vibration amplitude. The RMS of a signal is the square root of the average of the squared amplitudes, typically calculated over a 1-second period. As with airborne sound, the RMS velocity is often expressed in decibel notation as vibration decibels (VdB), which serves to compress the range of numbers required to describe vibration (FTA 2018: 110; Caltrans 2020: 7). RMS is based on a reference value of 1 microinch per second.

The typical background vibration-velocity level in residential areas is approximately 50 VdB. Ground vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration-velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels (FTA 2018: 120; Caltrans 2013: 27). Typical outdoor sources of perceptible ground vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground vibration is rarely perceptible.

Vibrations at approximately 100 VdB is generally the threshold at which minor damage to fragile buildings can occur. Construction activities can generate ground vibrations sufficient to pose a risk to nearby structures. Sufficiently intense constant or transient vibrations can weaken structures, crack facades, and disturb occupants (FTA 2018: 126).

Vibrations generated by construction activity can be transient, random, or continuous. Transient construction vibrations are generated by blasting, impact pile driving, and use of wrecking balls. Continuous vibrations are generated by vibratory pile drivers, large pumps, and compressors. Random vibration can result from jackhammers, pavement breakers, and heavy construction equipment. Table 4.9-6 summarizes the general human response to different ground vibration-velocity levels. Table 4.9-2, provided above, presents recommendations for vibration levels that could damage structures exposed to continuous vibration.

Table 4.9-6 Human Response to Different Levels of Ground Noise and Vibration

Vibration-Velocity Level	Human Reaction
65 VdB	Approximate threshold of perception.
75 VdB	Approximate dividing line between barely perceptible and distinctly perceptible. Many people find that transportation-related vibration at this level is unacceptable.
85 VdB	Vibration acceptable only if there are an infrequent number of events per day.

Note: VdB = vibration decibels referenced to 1 microinch per second and based on the root mean square (RMS) velocity amplitude.

Source: FTA 2018: Table 5-5.

Sound Propagation

When sound propagates over a distance, it changes in level and frequency content. The manner in which a noise level decreases with distance depends on the following factors.

Geometric Spreading

Sound from a localized source (i.e., a point source) propagates uniformly outward in a spherical pattern. The sound level attenuates (or decreases) at a rate of 6 dBA for each doubling of distance from a point source. Roads and highways consist of several localized noise sources along a defined path and can therefore be treated as a line source, which approximates the effect of several point sources and thus propagates at a slower rate than a point source. Noise from a line source propagates outward in a cylindrical pattern, often referred to as cylindrical spreading. Sound levels attenuate by 3 dBA for each doubling of distance from a line source.

Ground Absorption

Noise attenuation from ground absorption provides additional attenuation associated with geometric spreading. Traditionally, this additional attenuation has also been expressed as attenuation per doubling of distance. This approximation is usually sufficiently accurate for distances of less than 200 feet. For acoustically hard sites (i.e., sites with a reflective surface between the source and the receiver, such as a parking lot or body of water), no excess

ground attenuation is assumed. For acoustically absorptive or soft sites (i.e., those sites with an absorptive ground surface between the source and the receiver, such as soft dirt, grass, or scattered bushes and trees), an additional ground-attenuation value of 1.5 dBA per doubling of distance is normally assumed. When combined with the attenuation rate associated with cylindrical spreading, the additional ground attenuation yields an overall drop-off rate of 4.5 dBA per doubling of distance. This behavior would hold true for point sources, resulting in an overall drop-off rate of up to 7.5 dBA per doubling of distance.

Atmospheric Effects

Receivers downwind of a source can be exposed to higher noise levels than in calm conditions, whereas sources upwind can experience lower noise levels, because wind can carry sound in the direction it is moving. Sound levels can increase over large distances (e.g., more than 500 feet) from the source due to atmospheric temperature inversion, in which temperature increases with elevation. Other factors, such as air temperature, humidity, and turbulence, can also affect sound attenuation.

Shielding by Natural or Human-Made Features

A large object or barrier in the path between a noise source and a receiver attenuates noise levels at the receiver. The amount of attenuation provided by shielding depends on the size of the object and the frequency content of the noise source. Natural terrain features, such as hills and dense woods, and human-made features, including buildings and walls, can substantially reduce noise levels. A barrier that breaks the line of sight between a source and a receiver will typically result in at least 5 dBA of noise reduction (Caltrans 2013: 2-41; FTA 2018: 5-6, 6-25). Barriers higher than the line of sight provide increased noise reduction (FTA 2018: 2-12). Vegetation between the source and receiver is rarely effective in reducing noise because it creates a solid barrier only when multiple rows of vegetation are present (FTA 2018: 2-11).

EXISTING NOISE ENVIRONMENT

Existing Noise- and Vibration-Sensitive Land Uses

Noise-sensitive land uses are generally considered to include those where noise exposure could pose health risks to individuals, as well as places where quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because occupants may be present for extended periods, including during nighttime hours, resulting in greater potential for prolonged or repeated exposure to noise and vibration that could increase annoyance and interfere with sleep, rest, and other normal residential activities.

Additional land uses, such as schools, transient lodging, historic sites, cemeteries, and places of worship, are generally considered sensitive to increases in noise and vibration levels because quiet is an essential element of the intended purpose of the land use and/or sleep could be disrupted. Industrial and commercial land uses are not considered noise nor vibration sensitive land uses, as they typically do not house sensitive activities or are locations where people typically sleep. However, if vibration-sensitive activities (e.g. dentistry activities) or equipment (e.g. optical microscopes or specialized manufacturing) are present, these land use types would then be considered vibration-sensitive because vibration would interfere with operational activity that occurs within the building, even if vibration levels are well below those associated with human annoyance. Table 4.9-7 shows distances to noise- and vibration-sensitive receptors in the vicinity of the project site as measured from the nearest site boundary, as well as from the center of the closest construction activity, consistent with FTA methodology to account for the movement of construction equipment throughout that portion of the project site (FTA 2018: 177).

Table 4.9-7 Sensitive Receptors and Proximity to Project Construction

Building Name	Land Use Type	Distance (feet) From Acoustical Center[1]/From Nearest Site Boundary
California State Library	Library	300/118
State Treasurer's Office	Office Building—Business, Commercial and Professional	330/270
The Sutter Club	Private Club with meeting, food service, and similar facilities. However, no overnight lodging. A historic building.	90/10
Department of Rehabilitation	Office Buildings—Business, Commercial and Professional	210/70
Growing Mindfully Preschool	School	230/55
Leland Stanford Mansion	Museum. A historic building.	380/10
USCIS Sacramento Field Office	Institutional/Government Office	460/75
Adjacent Commercial Block	Commercial/Restaurant/Parking	160/25
Braille & Talking Book Library	Library	525/85
The Bel Vue Apartments + St. Claire at Capitol Park	Residential	390[2]
The Hardin	Residential	570[2]
Capitol Towers	Residential	560[2]
The Frederic	Residential	725[2]
Studios at the Hotel Berry	Residential	375[2]
The Lewis Apartments	Residential	1,273[2]

Notes: USCIS= U.S. Citizenship and Immigration Services.

[1] The demolition/construction noise analysis uses the distance from the acoustical center of the nearest demolition/construction site to the receptor and the vibration analysis uses the distance from the nearest demolition/construction site boundary to the nearest building façade.

[2] Where only one distance is provided, those receptors are beyond potential impact distances for vibration impacts. The distance provided is from the acoustical center of the nearest demolition/construction site and the sensitive receptor to support the demolition/construction noise analysis.

Source: Compiled by Ascent in 2026.

Existing Ambient Noise Environment and Noise Sources

The predominant noise source in the vicinity of the project site is vehicle traffic on the surrounding roadway network (e.g., Capitol Mall, 9th Street) and the Sacramento Regional Transit District (SacRT) light rail line which travels along 7th Street, 8th Street, and O Street. Common noise associated with the light rail operations consists of warning bells, wheels squealing during cornering, public address announcements, mechanical rooftop equipment, and idling. Other noise sources include landscape equipment on Capitol Mall and around nearby buildings, people talking, the occasional airplane flying overhead, and natural sounds such as birds chirping. During events on Capitol Mall there may be people talking on loudspeakers, crowd noise, and amplified music.

4.9.4 Environmental Impacts and Mitigation Measures

METHODOLOGY

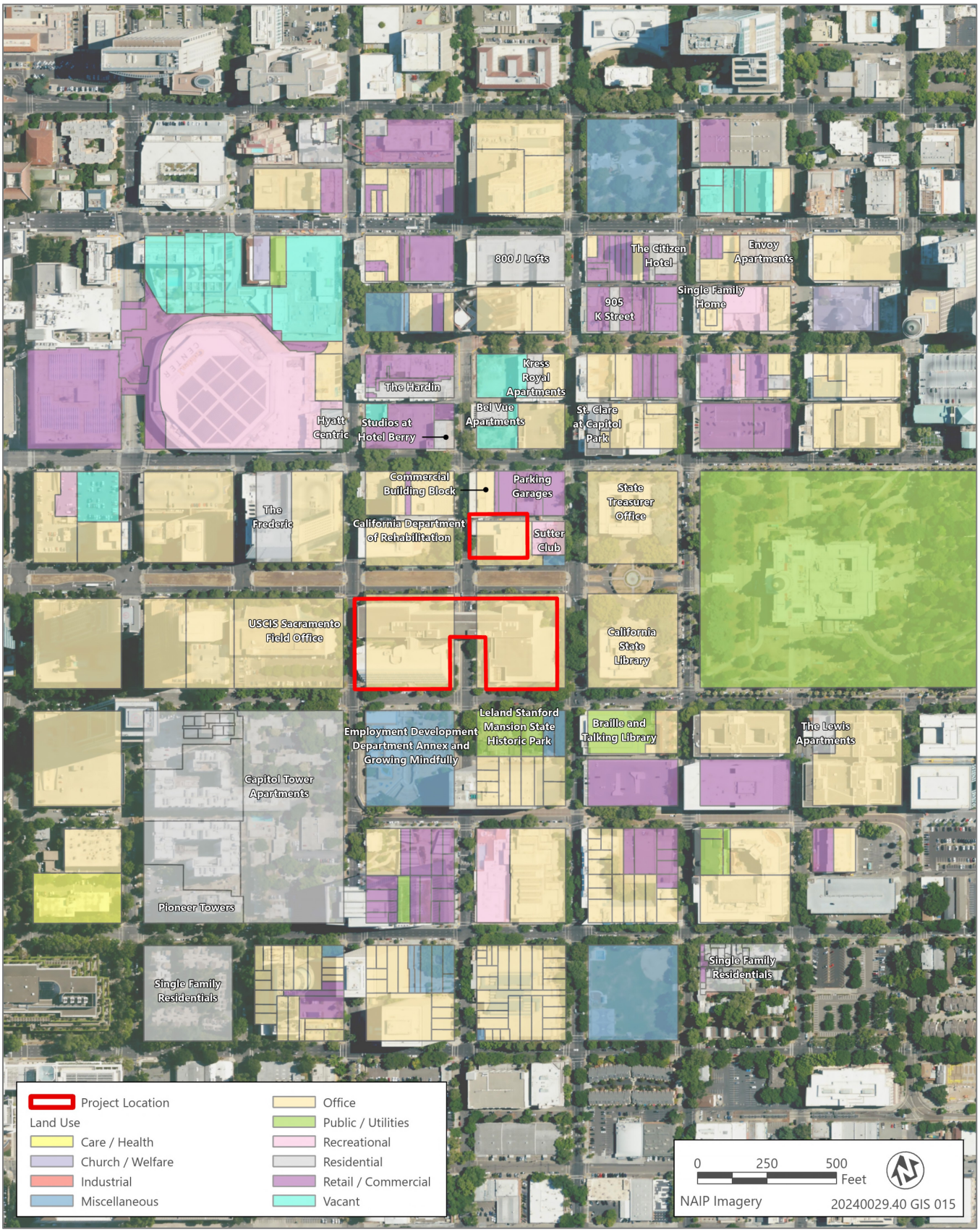
Construction/Demolition Noise and Vibration

To assess potential short-term (i.e., demolition- and construction-related) noise and vibration impacts, sensitive receptors and their relative exposure were identified. Project-generated demolition and construction source noise and vibration levels were determined based on methodologies, reference generation levels, and usage factors from FTA's *Guide on Transit Noise and Vibration Impact Assessment* methodology (FTA 2018) and Federal Highway Administration's *Roadway Construction Noise Model User's Guide* (FHWA 2006). Reference levels for noise and vibration generation for specific equipment or activity types are well documented, and their use is common practice in the field of acoustics.

Specifically for nighttime noise, the analysis first considered the worst-case equipment combination to develop predicted noise levels. Then, applying the applicable nighttime noise standards, calculated the distance from the source that the noise level standard would be achieved. The representative contour is called the "potential impact distance." This resulted in a circular contour with a radius of 1,445 feet from the center of each of the demolition/construction sites. Using these buffers, sensitive (daytime and nighttime) receptors were identified for evaluation. Further, considering that there are intervening structures between the demolition/construction sites and some of the identified receptors, a 3 to 5 db reduction (increasing rows of structures achieve more reduction) was applied for these locations where the line-of-site between the receptors (including all stories of the structure) would be blocked by existing structures (FHWA 2019). The 3 to 5 dB reduction effectively reduces the potential impact distance, however, all identified receptors are shown in Table 4.9-7 and Figure 4.9-1.

For demolition and construction vibration, reference vibration levels were modeled for typical anticipated demolition and construction scenarios and similar to the methodology described above, impact distances were modeled using Caltrans' – recommended vibration levels to assess potential structural damage and FTA's- recommended vibration levels to assess human annoyance. Appropriate vibration levels were selected based on the receiving land use type.

To assess potential long-term (operation-related) noise impacts due to project-generated increases in traffic, noise levels were estimated using calculations consistent with the Federal Highway Administration's Traffic Noise Model Version 2.5 (FHWA 2004) and project-specific traffic data. The noise modeling conducted was not based on specific project-generated traffic volumes but instead conducted to provide context to the level of changes in noise associated with proxy vehicle volume changes. These calculations were applied to the project-specific vehicular data available (i.e., vehicle miles traveled (VMT]), to conduct the analysis.



Source: Adapted by Ascent in 2026.

Figure 4.9-1 Sensitive Receptors

THRESHOLDS OF SIGNIFICANCE

Although State projects are exempt from local ordinances and standards, City noise standards are reasonable and appropriate thresholds for determination of significance because they provide established, locally relevant criteria for evaluating whether project-generated noise would result in substantial adverse effects on nearby sensitive receptors. Therefore, a noise impact is considered significant if implementation of the Capitol Mall Office Buildings Demolition Project would result in any of the following:

- **Short-term demolition/construction noise:** Short-term demolition/construction-generated noise levels exceeding City Noise Control Ordinance standards (i.e., 50 dba L_{eq} and 70 dBA L_{max} [exterior]) during the more noise-sensitive evening, nighttime, and early-morning hours (6:00 p.m. to 7:00 a.m., Monday through Saturday, and between 6:00 p.m. and 9:00 a.m. on Sunday);
- **Vibration Generation:** Short-term demolition/construction or long-term operational vibration levels exceeding FTA's maximum-acceptable-vibration standard with respect to human response (80 VdB for residential uses where people normally sleep and 83 VdB for institutional uses with primarily daytime uses) or Caltrans's recommended standards with respect to the prevention of structural building damage (0.2 and 0.08 in/sec PPV for normal and historical buildings, respectively);
- **Long-term operational noise:**
  - **Traffic noise:** Long-term operational, traffic-generated noise levels exceeding the applicable normally acceptable noise standards for land use compatibility (Table 4.9-3) as specified in the City of Sacramento General Plan Environmental Constraints Section or a distinctly noticeable increase in noise (i.e., 5 dBA);
  - **Stationary noise:** Long-term operational project-generated stationary noise levels that exceed City Noise Control Ordinance daytime (7:00 a.m. to 10:00 p.m.) or nighttime (10:00 p.m. to 7:00 a.m.) standards of 55 dBA L_{eq}/75 dBA L_{max} and 50 dBA L_{eq}/70 dBA L_{max}, respectively, or result in new sensitive land uses (i.e., residential or hotel/lodging) that are exposed to interior noise levels that exceed 45 dBA L_{eq};
- **Airport/Aircraft noise exposure:**
  - For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels; or
  - For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels.

ISSUES NOT DISCUSSED FURTHER

Operational Vibration Generation

Operation of the development scenario evaluated in this EIR would not result in new major sources of vibration such as transit, rail, or highways, and would not locate any new sensitive receptors near existing major sources of vibration. Therefore, the operation of future development would not result in excessive long-term vibration or vibration levels that would adversely affect any receptors, and long-term operational vibration-related impacts are not discussed further.

Airport/Aircraft Noise Exposure

The project is not located within an airport land use plan, or within 2 miles of a public airport or public use airport. In addition, the project is not located within 2 miles of a private airstrip. Sacramento Executive Airport is the closest public airport and is located approximately 4 miles south of the project site. Thus, the project would not result in noise impacts related to the exposure of people residing or working in the project area to excessive aircraft-related noise levels. This issue is not discussed further.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 4.9-1: Short-Term Demolition/Construction-Related Noise Levels

Demolition and construction activities associated with the project would generate temporary noise levels during daytime and, in some circumstances, could require nighttime work. Daytime construction activities would be exempt from the City's daytime noise standards, as established in the City of Sacramento's Municipal Code (Section 8.68.080 Exemptions). Although daytime construction is exempt from the City noise standards, if demolition or construction is required during more sensitive times of day, noise from these activities would exceed the City's nighttime noise standards, established to protect residential uses from sleep disturbance, resulting in potentially adverse effects on nearby sensitive receptors. Therefore, this impact would be **potentially significant**.

Demolition and construction activities are acoustically similar in that they rely on many of the same types of heavy equipment and generate comparable noise levels. Typical equipment used during both demolition and construction phases includes dozers, loaders, excavators, haul trucks, and compressors. The overall equipment types, usage patterns, and resulting noise characteristics used for demolition activities are consistent with those analyzed for construction activities.

Because the FTA guidance provides representative noise emission levels and usage factors for this common set of equipment, the same modeling approach used to evaluate construction noise is appropriate for demolition activities. This includes the use of equipment-based noise levels, assumed operational durations, and standard propagation methodologies to estimate noise exposure to nearby sensitive receptors. Therefore, demolition noise impacts are represented using the same methodology and assumptions applied to construction noise modeling, consistent with established industry practice.

Short-term demolition/construction noise levels near the project site would fluctuate depending on the type, number, and duration of usage for the varying equipment. The effects of construction noise largely depend on the type of construction activities being performed; the noise levels generated by those activities; the distances to noise-sensitive receptors; the relative locations of noise-attenuating features, such as existing structures; and existing ambient noise levels. Construction generally occurs in several discrete stages, each phase requiring a specific complement of equipment with varying types, quantities, and intensities. These variations in the equipment's operational characteristics affect the noise environment at the project site and in the surrounding area for the duration of the construction period.

As discussed in Chapter 3, "Project Description," various heavy-duty equipment would be required for demolition and construction activities. Table 4.9-8 lists anticipated equipment to be used and the associated reference maximum (i.e., L_{max}) levels for each type.

Table 4.9-8 Noise Emission Levels from Construction Equipment

Equipment Type	Typical Noise Level (dBA L_{max}) @ 50 feet
Drill Rig (Auger)	85
Compressor	80
Concrete Mixer	85
Concrete Pump Truck	82
Concrete Saw	90
Crane	85
Dozer	85
Grader	85
Excavator	85
Loader/Backhoe/Bobcat/Forklift	79

Equipment Type	Typical Noise Level (dBA L_{max}) @ 50 feet
Lifts (boom/man/scissor)	85
Paver	85
Pickup Trucks	55
Roller	85
Scraper	85
Tractor	84
Truck	84
Welder	73
Pneumatic Tools	85

Notes: Assumes all equipment is fitted with a properly maintained, operational noise-control device per manufacturer specifications. The listed noise levels are manufacturer-specified for each piece of heavy construction equipment.

Source: FTA 2018.

Demolition

Demolition of existing structures on the project site could generate noise levels exceeding thresholds of significance at nearby sensitive receptors. Noise generated during demolition of existing buildings and associated structures is typically due to the operation of on- and off-road vehicles and equipment. Typical heavy-duty equipment anticipated for demolition work includes concrete saws, dozers, excavators, loaders, cranes, water trucks, haul trucks, and pneumatic tools. A majority of the proposed demolition activities would be expected to occur during daytime hours consistent with the City of Sacramento's hours of exemption. However, there could be circumstances in which nighttime activities would be required, such as the removal of the "sky bridge" portion of the EDD Headquarters Building that crosses 8th Street.

To evaluate anticipated noise levels associated with daytime and nighttime activities, the loudest equipment associated with typical activities during daytime and nighttime work were considered. Regarding daytime activities and based on anticipated demolition activities and heavy-duty equipment likely to be used, the loudest two pieces of equipment (i.e., concrete saw and grader [representing the variety of equipment generating 85 dBA L_{max} at 50 feet]) that could operate simultaneously near each other during the daytime were modeled. Applying the reference noise levels provided in Table 4.9-8 and combining noise from these pieces of equipment, daytime demolition noise levels would result in 84.2 dBA L_{eq} and 90 dBA L_{max} at 50 feet. Construction noise typically attenuates (reduces) at a rate of 6 dB per each doubling of the distance from the source. As shown in Figure 4.9-1 and Table 4.9-7, surrounding uses include residential, commercial, office, and educational/institutional uses at varying distances. Therefore, exposure level would depend on the distance of each specific use from the active demolition site and background noise levels (e.g., light rail, traffic) in the vicinity. Table 4.9-9 demonstrates how demolition noise would reduce with increasing distance from the source.

Table 4.9-9 Daytime Demolition Noise Exposure Level at Varying Distances

Distance from Daytime Demolition Activity	Typical Noise Level (dBA) at Specified Distance
50 feet	84.2 L_{eq} / 90 L_{max}
100 feet	78.2 L_{eq} / 84 L_{max}
200 feet	72.2 L_{eq} / 78 L_{max}
400 feet	66.2 L_{eq} / 72 L_{max}
800 feet	60.2 L_{eq} / 66 L_{max}
1,600 feet	54.2 L_{eq} / 60 L_{max}

Notes: dBA= a- weighted decibels; L_{eq} = hourly-average; L_{max} = maximum instantaneous noise level.

Source: Modeled by Ascent in 2026.

The closest residential receptors to the proposed demolition activities are The Studios at the Hotel Berry, located 375 feet from demolition. At that distance, noise levels would be 66.7 dBA L_{eq} and 73.1 dBA L_{max}. The closest nonresidential receptor to demolition activities is the Sutter Club, located 10 feet away and noise at this location would be as high as 98.2 dBA L_{eq} and 104.6 dBA L_{max}. At receptors at greater distances than these, noise levels would reduce, in accordance with levels presented in Table 4.9-9.

Noise generated by construction activity (which would also include project demolition activities) between 7:00 a.m. and 6:00 p.m., Monday through Saturday, and between 9:00 a.m. and 6:00 p.m. on Sunday are exempt from the provisions of the City Noise Control Ordinance. As described in Chapter 3, "Project Description," demolition and construction would primarily occur during the day, thus, would be exempt from City Noise Control Ordinance provisions. In addition. Typical building construction provides at least a 25-dB exterior-to-interior noise reduction (Caltrans 2002). So, maximum noise levels reported above would be much lower within adjacent buildings.

Regarding nighttime demolition work, and due to safety concerns with operating industrial and concrete saws, the two loudest pieces of equipment likely to be used at night (i.e., cranes, dozers [both representing the variety of equipment generating 85 dBA L_{max} at 50 feet]) were modeled. Based on reference levels for these equipment, nighttime demolition could result in 79.2 dBA L_{eq} and 84.5 dBA L_{max} at 50 feet from equipment use. Based on the review of nearby sensitive receptors shown above, only residential receptors would be a concern for nighttime demolition activities due to the potential for sleep disturbance. As described above in the Methodology section, receptors were identified using a potential impact distance and modeled noise levels applying attenuation rates and appropriate reductions associated with intervening structures (i.e., 3 dB for one row of structures, 5 dB for two or more rows of structures). Applying this methodology to the potential impact distance for receptors beyond the immediate vicinity of the project, because there are intervening structures at these further locations, the potential impact distance was reduced to 1,023 feet from demolition activity. Table 4.9-10 summarizes the demolition nighttime noise levels at the nearest residential uses compared to the nighttime standards of 50 dBA L_{eq} and 70 dBA L_{max}.

Table 4.9-10 Nighttime Demolition Noise Levels at Nearby Sensitive Receptors

Receptor Name	Distance from Nearest Demolition Site (feet)	Attenuated Noise Level at Receptor[1] (dBA L_{eq}/L_{max})	Nighttime Exterior Noise Level Standards	Exceeds Standards (dBA L_{eq}/L_{max})?
Studios at Hotel Berry	375	58.7 L_{eq} / 64 L_{max}	50 dBA L_{eq} / 70 dBA L_{max}	Yes/No
Bel Vue Apartments + St. Claire at Capitol Park	390	58.4 L_{eq} / 63.7 L_{max}		Yes/No
The Hardin	570	53.1 L_{eq}/ 58.4 L_{max}		Yes/No
The Frederic	725	51.0 L_{eq}/ 56.3 L_{max}		Yes/No
Capitol Towers	560	58.2 L_{eq}/ 63.6 L_{max}		Yes/No
The Lewis Apartments	1,273	48.1 L_{eq}/ 53.4 L_{max}		No/No

Notes: dBA = A-weighted decibels; L_{eq} = equivalent continuous sound level; L_{max} = maximum sound level.

[1] Attenuated value includes adjustment of 3 dBA or 5 dBA depending on whether 1 row or 2 rows of structures are located between demolition sites and receptors.

Source: Modeled by Ascent in 2026.

As shown in Table 4.9-10, nighttime demolition noise levels would not exceed the L_{max} standard of 70 dBA at any nearby residential receptor. However, noise levels at all nearby residential receptors except for The Lewis Apartments would exceed the 50 dBA L_{eq} nighttime standard. This impact would be potentially significant.

Future Development

The development of potential campus facilities could generate construction-related noise levels at nearby sensitive receptors. Noise generated during the construction of buildings and associated structures is typically due to the operation of on- and off-road vehicles and equipment, including heavy trucks, excavators, and earth movers. The specific construction schedule is unknown at this time, but it is assumed that some phases of construction would go on continuously for longer than 12 months, with the majority of work occurring during daytime hours, with the

possibility for some instances of nighttime work (e.g., large concrete pours that cannot be interrupted and must occur continuously into the nighttime hours).

With regards to building construction, the site preparation/grading phases are typically the loudest. Because specific timing for each construction phase and activity is not available at the time of this analysis, the construction-noise evaluation conservatively assumed that two of the highest-noise-generating pieces of equipment (e.g., grader and dozer) associated with earth moving activities could operate simultaneously near each other.

Applying the reference noise level as shown in Table 4.9-8 and combining noise from these pieces of equipment, construction noise levels would result in 82.8 dBA L_{eq} and 86.8 dBA L_{max} at 50 feet during daytime construction activities. Table 4.9-11 demonstrates how daytime construction noise would reduce with increasing distance from the source.

Table 4.9-11 Daytime Construction Noise Exposure Level at Varying Distances

Distance from Daytime Construction Activity	Typical Noise Level (dBA) at Specified Distance
50 feet	82.8 L_{eq} / 86.8 L_{max}
100 feet	76.8 L_{eq} / 80.8 L_{max}
200 feet	70.8 L_{eq} / 74.8 L_{max}
400 feet	64.8 L_{eq} / 68.8 L_{max}
800 feet	58.8 L_{eq} / 62.8 L_{max}
1,600 feet	52.8 L_{eq} / 56.8 L_{max}

Notes: dBA= a- weighted decibels; L_{eq} = hourly-average; L_{max} = maximum instantaneous noise level.

Source: Modeled by Ascent in 2026.

The closest residential receptors to the proposed future construction activities are The Studios at the Hotel Berry, located 375 feet from construction. At that distance noise levels would be 65.3 dBA L_{eq} and 69.3 dBA L_{max}. The closest nonresidential receptor to demolition activities is the Sutter Club, located 10 feet away and noise at this location would be as high as 96.8dBA L_{eq} and 100.7 dBA L_{max}. At receptors at greater distances than these, noise levels would decrease, in accordance with levels presented in Table 4.9-11.

Noise generated by construction activity between 7:00 a.m. and 6:00 p.m., Monday through Saturday, and between 9:00 a.m. and 6:00 p.m. on Sunday is exempt from the provisions of the City Noise Control Ordinance. As described in Chapter 3, "Project Description," construction would primarily occur during the day, and thus would be exempt from City Noise Control Ordinance provisions. In addition, typical building construction provides at least a 25-dB exterior-to-interior noise reduction (Caltrans 2002). Therefore, maximum noise levels reported above would be much lower within adjacent buildings.

Regarding the potential for construction activities to occur at night, while most activities occur during the day, some activities that require continuous work, such as a large concrete pour, could require nighttime activities. The two loudest pieces of equipment likely to be used at night (i.e., concrete mixer truck, pickup truck) were modeled. Based on reference levels for these equipment, nighttime concrete work could result in 76.5 dBA L_{eq} and 80.5 dBA L_{max} at 50 feet from equipment use.

Based on the review of nearby sensitive receptors shown above, only residential receptors would be a concern for nighttime demolition activities due to the potential for sleep disturbance. The same methods discussed above under the Demolition analysis were applied here. Table 4.9-12 summarizes the nighttime construction noise levels at the nearest residential uses compared to the nighttime standards of 50 dBA L_{eq} and 70 dBA L_{max}.

As shown in Table 4.9-12, nighttime construction activities would not exceed the L_{max} standard of 70 dBA at any nearby residential receptor. However, noise levels at nearby residential receptors (i.e., the Studios at the Hotel Berry, Bel Vue Apartments, St. Claire at Capitol Park, The Hardin, and Capitol Towers) would exceed the 50 dBA L_{eq} nighttime standard. This impact would be potentially significant.

Table 4.9-12 Nighttime Construction Noise Levels at Nearby Sensitive Receptors

Receptor Name	Distance from Nearest Construction Site (feet)	Attenuated Noise Level at Receptor[1] (dBA L_{eq}/L_{max})	Nighttime Exterior Noise Level Standards	Exceeds Standards?
Studios at Hotel Berry	375	56.0 L_{eq} / 60.0 L_{max}	50 dBA L_{eq} / 70 dBA L_{max}	Yes/No
Bel Vue Apartments + St. Claire at Capitol Park	390	55.6 L_{eq} / 59.6 L_{max}	50 dBA L_{eq} / 70 dBA L_{max}	Yes/No
The Hardin	570	50.3 L_{eq}/ 54.3 L_{max}	50 dBA L_{eq} / 70 dBA L_{max}	Yes/No
The Frederic	725	48.2 L_{eq}/ 52.2 L_{max}	50 dBA L_{eq} / 70 dBA L_{max}	No/No
Capitol Towers	560	55.5 L_{eq}/ 59.5 L_{max}	50 dBA L_{eq} / 70 dBA L_{max}	Yes/No
The Lewis Apartments	1,273	45.4 L_{eq}/ 49.3 L_{max}	50 dBA L_{eq} / 70 dBA L_{max}	No/No

Notes: dBA = A-weighted decibels; L_{eq} = equivalent continuous sound level; L_{max} = maximum sound level.

Source: Modeled by Ascent in 2026.

Conclusion

Demolition activities would generally occur during daytime hours that are exempt from the City's Noise Control Ordinance, and the majority of demolition activities would therefore not be subject to the City's daytime noise standards. However, demolition activities could extend into nighttime hours, such as the anticipated nighttime work for demolition of the EDD Headquarters Building sky bridge. The nighttime demolition analysis indicates that noise levels would exceed the applicable 50 dBA L_{eq} nighttime standard at several nearby residential receptors, although the 70 dBA L_{max} standard would not be exceeded. Accordingly, while daytime demolition would occur during the City's exempt hours, nighttime demolition could result in a potentially significant noise impact.

Construction activities would similarly be expected to occur primarily during daytime hours, when activities are exempt from the City's Noise Control Ordinance. Daytime construction noise would therefore not be subject to the City's daytime noise standards, and typical building construction would provide additional attenuation at interior residential locations. However, certain construction activities, such as large concrete pours, could require nighttime work. The nighttime construction analysis indicates that noise levels would exceed the 50 dBA L_{eq} nighttime standard at several nearby residential receptors, while the 70 dBA L_{max} standard would not be exceeded. Therefore, although daytime construction would occur during the City's exempt hours, nighttime construction could result in a potentially significant noise impact. This impact is **potentially significant**.

Mitigation Measures

Mitigation Measure 4.9-1: Nighttime Demolition and Construction Noise Reduction Methods

DGS (during demolition), or the entity implementing future development (e.g., Sacramento State), shall implement the following measures to reduce potential noise impacts associated with nighttime demolition/construction activities occurring outside the City of Sacramento's exempt construction hours:

- A disturbance coordinator shall be designated to ensure compliance with noise mitigation measures and to respond to noise complaints. A phone number or other instantaneous notification method shall be posted on site for use by the public in reporting any noise concerns.
- All residents and property owners within 1,200 feet of the project site shall be notified in writing of anticipated nighttime demolition or construction occurring outside the City's exempt construction hours, including hours of operation and expected noise-generating activities, at least one week prior to the start of such activities. This noticing shall inform the recipients of when and where nighttime demolition/construction would occur and the types of measures being implemented to lessen the impact at potentially affected receptors. This noticing shall also provide the contact information for the designated disturbance coordinator. The disturbance coordinator shall receive all public complaints and be responsible for determining the cause of the complaint and implementing any feasible measures to alleviate the problem.

- Temporary noise barriers or curtains shall be installed as close as possible to the nighttime noise-generating activity such that the curtains obstruct the direct line of sight between the noise-generating construction activity and the nearby sensitive receptors. Such barriers may be installed along the boundary of the active demolition/construction site. Temporary noise curtains shall consist of a durable, flexible composite material featuring a noise-barrier layer bonded to sound-absorptive material on one side. The noise barrier layer shall consist of rugged, impervious, material with a surface weight of at least one pound per square foot.
- Noise-reducing enclosures and techniques shall be used around stationary noise-generating equipment (e.g., concrete mixers, generators, compressors) when operating outside the exempt construction hours. These noise-reducing measures may be retained in place during exempt construction hours if desired.
- Heavy-duty construction equipment shall be operated at the lowest operating power possible. All construction equipment shall be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations. Equipment engine shrouds shall be closed during equipment operation.
- When available, construction equipment with back-up alarms shall be equipped with either audible self-adjusting backup alarms or alarms that only sound when an object is detected. Self-adjusting backup alarms shall automatically adjust to 5 dB over the surrounding background levels. All non-self-adjusting backup alarms shall be set to the lowest setting required to be audible above the surrounding noise levels.

Significance after Mitigation

Implementation of Mitigation Measure 4.9-1 would reduce potential community disruption by providing advance notice of nighttime construction activities and establishing a mechanism to address noise complaints; however, advance notice would not directly reduce noise generated by construction equipment or activities. Temporary noise barriers, sound curtains, and other construction noise control measures may reduce noise up to 10 dB (NCHRP 1999). However, effectiveness depends on various factors, including how well the barrier blocks the line-of-sight, whether or not there are gaps in the barrier, and if the receptors are in upper levels of buildings and in direct line of site of the activity. Nighttime noise during potential demolition activities would require a reduction of 9 dB to achieve thresholds at all receiving residential uses and for nighttime construction associated with future development, a 6 dB reduction would be required. Thus, it is conceivable that if barriers are used during all nighttime activities and implemented adequately, nighttime noise standards could be achieved at all nearby residential receptors. However, considering that nearby receptors are in residential multi-level towers, unless barriers are sufficiently close to construction activities/equipment, it is unlikely that the full level of reduction would not be achieved at all nearby residential receptors. As a result, occupants of upper-story buildings and other sensitive receptors could continue to experience construction noise levels that exceed applicable standards despite implementation of mitigation. Therefore, impact would be **significant and unavoidable** for nighttime demolition and construction activities.

Impact 4.9-2: Short-Term Demolition- and Construction-Related Vibration Levels

Demolition and future construction activities associated with the project would generate groundborne vibration that could affect nearby sensitive receptors. Predicted vibration levels from typical demolition and construction activities would exceed FTA-recommended criteria at daytime-sensitive uses located within 58 feet of equipment use. In addition, vibration generated by heavy equipment operating within 48 feet of sensitive structures, could exceed Caltrans' recommended vibration threshold of 0.08 in/sec PPV to protect historic structures. Therefore, the project's construction vibration impact would be **potentially significant**.

Demolition and construction activities generate varying degrees of temporary ground vibration, depending on the specific construction equipment used and activities involved. Ground vibration generated by demolition/construction equipment propagates through the ground and diminishes in magnitude with increasing distance. The effects of ground vibration may be imperceptible at the lowest levels, result in low rumbling sounds and detectable vibrations at moderate levels, and, at high levels, cause annoyance, sleep disturbance, and damage to nearby structures.

Demolition and construction activities rely on many of the same types of heavy equipment. It is assumed that neither building demolition nor future construction would use impact pile driving or blasting. Consistent with typical construction practices in downtown Sacramento, it is assumed that pile installation would use alternatives to impact pile driving, such as drilled-auger cast piles or drilled-displacement piles. No substantial or unique vibration-generating activities would be involved in the demolition or future redevelopment of the project site. Tables 4.9-13 and 4.9-14 present typical construction equipment vibration levels expressed in VdB and PPV, respectively.

Vibration assessments are generally separated into two distinct analyses. The first focuses on the receiving land uses perception and associated level of annoyance to vibration-inducing activities, using FTA's vibration guidance criteria in terms of VdB. The second addresses the possibility that vibration-inducing activities could cause structural damage to nearby structures, using Caltrans's vibration guidance criteria in terms of PPV. VdB and PPV are described in more detail in Section 4.9.3, "Environmental Setting," in the subsection titled "Vibration Fundamentals." Distances at which various VdB and PPV vibration levels would be exceeded from the operation of different pieces of construction equipment are tabulated in Table 4.9-13 and Table 4.9-14, respectively.

Table 4.9-13 Vibration Levels of Typical Construction Equipment (VdB)

Equipment Type	Reference Vibration Level (VdB at 25 feet)	Vibration Levels (VdB)					
		65	72	75	78	80	83
		Distances from Vibration Source (feet)					
Vibratory Roller	94	232	135	107	85	73	58
Hoe Ram Impact Hammer	87	135	79	63	50	43	34
Large Bulldozer	87	135	79	63	50	43	34
Caisson Drilling	87	135	79	63	50	43	34
Loaded Trucks	86	125	73	58	46	40	31
Jackhammer	79	73	43	34	27	23	18
Small Bulldozer	58	15	9	7	5	5	4

Notes: VdB = Velocity Decibels.

Source: Modeled by Ascent in 2026.

Table 4.9-14 Vibration Levels of Typical Construction Equipment (PPV, in/sec)

Equipment Type	Reference Vibration Level (PPV at 25 feet)	Vibration Levels (PPV, in/sec)									
		0.04	0.08	0.12	0.2	0.25	0.3	0.5	0.9	1.0	2.0
		Distances from Vibration Source (feet)									
Vibratory Roller	0.210	76	48	36	26	22	20	14	9	9	7
Hoe Ram Impact Hammer	0.089	43	27	20	15	13	11	8	5	5	1
Large Bulldozer	0.089	43	27	20	15	13	11	8	5	5	4
Caisson Drilling	0.089	43	27	20	15	13	11	8	5	5	2
Loaded Trucks	0.076	38	24	18	13	11	10	7	5	4	3
Jackhammer	0.035	23	14	11	8	7	6	4	3	3	1
Small Bulldozer	0.003	4	3	2	2	1	1	1	1	1	0

Notes: PPV = Peak Particle Velocity; in = inches; sec = seconds.

Source: Modeled by Ascent in 2026.

For purposes of evaluating human annoyance, FTA identifies three land use categories based on sensitivity to ground-borne vibration. Category 1 includes high-sensitivity uses where vibration could interfere with operations, such as facilities with vibration-sensitive research or manufacturing equipment. Category 2 includes residences and other buildings where people normally sleep, such as hotels and hospitals. Category 3 includes institutional land uses

with primarily daytime use, such as schools, churches, libraries, and quiet offices. Commercial and industrial land uses, where activities are not typically sensitive to low levels of vibration, are not considered vibration-sensitive receptors for the purpose of evaluating human annoyance. For each land use category, FTA provides increasingly stringent standards depending on if the vibration-inducing activity is "frequent," "occasional," or "infrequent." The infrequent criteria are applied for normal demolition and construction activities, as defined by fewer than 30 events of the same source per day. In this instance the vibration event would be the passing by of an individual piece of equipment near the receptor. Activities that are more commonly considered frequent would include pile driving, jackhammers, or other similar activities.

Based on the anticipated demolition activities, a bulldozer is likely to generate the highest vibration levels and during future development, a vibratory roller is anticipated to generate the highest vibration levels. Each scenario is evaluated below.

Demolition

The vibration analysis for demolition applies the reference vibration levels for the highest vibration-generating equipment that could be used for demolition activities (i.e., a large bulldozer) and the modeled distance to achieve acceptable vibration levels for these uses (i.e., 43 feet associated with 80 VdB for uses where people sleep and 34 feet associated with 83 VdB for daytime sensitive uses).

Note that for vibration impacts, distances are measured from the limits of anticipated work to the façade of the receiving land use, which differs from distances presented above in Table 4.9-7 for noise assessment which is measured from the acoustical center of the site. Thus, because impacts would only occur within modeled distances (i.e., 43 feet), only receptors surrounding the active demolition areas were identified (i.e., within approximately 100 feet). Table 4.9-15 shows the modeled vibration levels associated with daytime demolition activities at nearby sensitive receptors in comparison to FTA's human annoyance criteria.

Table 4.9-15 Demolition Vibration Levels at Sensitive Receptors in Regard to Human Annoyance

Building Name	FTA Land Use Category	Distance (feet)[1]	Distance Up To Which FTA's Vibration Standard Would Be Exceeded		
			FTA Vibration Standard (VdB)	Distance (feet)	Within Impact Distance?
California State Library	Category 3	118	83	34	No
State Treasurer's Office	Category 3	270	83	34	No
The Sutter Club	Category 3	10	83	34	Yes
Department of Rehabilitation	Category 3	70	83	34	No
Growing Mindfully Preschool	Category 3	55	83	34	No
Leland Standford Mansion	Category 3	60	83	34	No
USCIS Sacramento Field Office	Category 3	75	83	34	No
Adjacent Commercial Block	Category 3	25	83	34	Yes
Braille & Talking Book Library	Category 3	85	83	34	No

Notes: FTA = Federal Transit Administration; VdB = Vibration Decibels; USCIS = U.S. Citizenship and Immigration Services;

[1] As measured from the edge of the nearest site to be demolished and the adjacent façade.

Source: Modeled by Ascent in 2026.

As shown in Table 4.9-15, receptors located within 34 feet of active demolition activities (i.e., the Sutter Club and the adjacent commercial block) would experience vibration levels that exceed the applicable FTA-recommended level for sensitive daytime uses. No residential land uses are located within the identified impact distance of 43 feet.

Regarding structural damage from vibration-inducing activities, Caltrans provides vibration criteria for assessing potential structural damage based on the type of structures subject to groundborne vibration. Typical structures (e.g., modern commercial/industrial and residential buildings) could experience damage with vibration levels of 0.2 PPV

(in/sec) or greater. The applicable threshold for potential structural damage for historic buildings is 0.08 in/sec PPV (Caltrans 2020). Applying the reference vibration levels for the highest vibration-generating equipment that could be used for demolition activities (i.e., a large bulldozer) and the modeled distance to achieve acceptable vibration levels for these uses (i.e., 27 feet associated with 0.08 PPV in/sec for historical structures and 15 feet associated with 0.2 PPV in/sec associated with typical structures), vibration effects at the same sensitive receptors identified in Table 4.9-15 were considered. Table 4.9-16 summarizes the approximate distances from nearby sensitive receptors to demolition activities in relation to the Caltrans structural damage criteria.

Table 4.9-16 Demolition Vibration Levels at Sensitive Receptors in Regard to Structural Damage

Building Name	Distance[1] (feet)	Distance Up To Which Caltrans' Vibration Standard Would Be Exceeded		
		Caltrans' Vibration Standard (PPV)	Distance (feet)	Within Impact Distance?
California State Library	118	0.2	15	No
State Treasurer's Office	270	0.2	15	No
The Sutter Club	10	0.08	27	Yes
Department of Rehabilitation	70	0.2	15	No
Growing Mindfully Preschool	55	0.2	15	No
Leland Stanford Mansion	60	0.08	27	No
USCIS Sacramento Field Office	75	0.2	15	No
Commercial Building	25	0.2	15	No
Braille & Talking Book Library	85	0.2	15	No

Notes: FTA = Federal Transit Administration; USCIS = U.S. Citizenship and Immigration Services; PPV= peak particle velocity;

[1] As measured from the edge of the nearest site to be demolition and the adjacent façade.

Source: Modeled by Ascent in 2026.

As shown in Table 4.9-16, the only structure within the Caltrans-recommended level to prevent structural damage is the adjacent Sutter Club. Nearby daytime-sensitive uses (adjacent Commercial Building, Sutter Club) could be exposed to vibration levels that cause human annoyance and the nearby Sutter Club would be within distances to demolition that could potentially cause structural damage. This impact would be potentially significant.

Future Development

During future development, construction activities would involve site preparation, building construction, and paving. Of these activities, a vibratory roller associated with paving activities generates the highest vibration levels.

Applying the reference vibration levels for the highest vibration-generating equipment that could be used for construction activities (i.e., a vibratory roller) and the modeled distance to achieve acceptable vibration levels for these uses (i.e., 73 feet associated with 80 VdB for uses where people sleep and 58 feet associated with 83 VdB for daytime sensitive uses), vibration effects at the same vibration sensitive receptors identified in demolition analysis were considered.

Table 4.9-17 shows the modeled vibration levels associated with future development construction at nearby sensitive receptor in comparison to FTA's human annoyance criteria.

Because vibratory paving equipment associated with construction is anticipated to generate groundborne vibration greater than initial demolition activities, additional receptors to The Sutter Club (i.e., Growing Mindfully Preschool and the adjacent Commercial Building) could be exposed to vibration levels during construction that exceed FTA's recommended levels for daytime-sensitive uses. No land uses where people sleep occur within the 83 VdB human annoyance impact distance.

Table 4.9-17 Future Development Vibration Levels at Sensitive Receptors in Regard to Human Annoyance

Building Name	FTA Land Use Category	Distance (feet)[1]	Distance Up To Which FTA's Vibration Standard Would Be Exceeded		
			FTA Vibration Standard (VdB)	Distance (feet)	Within Impact Distance?
California State Library	Category 3	118	83	58	No
State Treasurer's Office	Category 3	270	83	58	No
The Sutter Club	Category 3	10	83	58	Yes
Department of Rehabilitation	Category 3	70	83	58	No
Growing Mindfully Preschool	Category 3	55	83	58	Yes
Standford Mansion	Category 3	60	83	58	No
USCIS Sacramento Field Office	Category 3	75	83	58	No
Commercial Building	Category 3	25	83	58	Yes
Braille & Talking Book Library	Category 3	85	83	58	No

Notes: FTA = Federal Transit Administration; USCIS = U.S. Citizenship and Immigration Services; VdB = Vibration Decibels.

[1] As measured from the edge of the nearest site to be demolition and the adjacent façade.

Source: Modeled by Ascent in 2026.

Table 4.9-18 shows the modeled vibration levels associated with future development construction at nearby sensitive receptors in comparison to impact distances associated with Caltrans' structural damage criteria.

Table 4.9-18 Future Development Vibration Levels at Sensitive Receptors in Regard to Structural Damage

Building Name	Distance[1] (feet)	Distance Up To Which Caltrans' Vibration Standard Would Be Exceeded		
		Caltrans' Vibration Standard (PPV)	Distance (feet)[1]	Within Impact Distance?
California State Library	118	0.2	26	No
State Treasurer's Office	270	0.2	26	No
The Sutter Club	10	0.08	48	Yes
Department of Rehabilitation	70	0.2	26	No
Growing Mindfully Preschool	55	0.2	26	No
Leland Stanford Mansion	60	0.08	48	No
USCIS Sacramento Field Office	75	0.2	26	No
Commercial Building	25	0.2	26	Yes
Braile & Talking Book Library	85	0.2	26	No

Notes: FTA = Federal Transit Administration; USCIS = U.S. Citizenship and Immigration Services; PPV = peak particle velocity.

[1] As measured from the edge of the nearest site to be demolished and the affected façade.

Source: Modeled by Ascent in 2026.

As shown in Table 4.9-18, during construction of future development, receptors located within 48 feet and 26 feet of active construction activities (i.e., The Sutter Club, the adjacent Commercial Building) would experience vibration levels that exceed the applicable Caltrans-recommended level to prevent structural damage. And, as described above, daytime uses (i.e., The Sutter Club, Growing Mindfully Preschool, and the adjacent Commercial Building) would be exposed to vibration levels that exceed the FTA-recommended level to prevent human annoyance for daytime users. This impact would be **potentially significant**.

Conclusion

Demolition activities would use various equipment that generate groundborne vibration. Of the anticipated equipment, a bulldozer generates the highest vibration levels. Applying typical propagation factors to reference levels for a dozer generates impact distances (by receiver use) associated with human annoyance of 43 feet for typical structures (residences/commercial structures) and 34 feet for uses that have sensitive daytime activities. Based on the review conducted of nearby sensitive uses (e.g., residences, commercial, office, educational), as shown in Table 4.9-15, the nearby Commercial Building and The Sutter Club would be exposed to vibration levels that exceed the FTA human annoyance criteria during some portion of demolition if the three existing buildings. Applying typical propagation factors to reference levels for a dozer generates impact distances (by receiver use) associated with structural damage of 27 feet for historical structures and 15 feet for typical structures; based on the review conducted of nearby structures (e.g., residences, commercial, office, educational), as shown in Table 4.9-16, the nearby Sutter Club would be exposed to vibration levels that exceed the Caltrans' structural damage criteria during nearby demolition activities.

Regarding future development, construction activities would use various equipment that generate vibration levels. Of the anticipated equipment, a vibratory roller generates the highest vibration levels. Applying typical propagation factors to reference levels for a vibratory roller generates impact distances (by receiver use) associated with human annoyance of 73 feet for typical structures (residences) and 58 feet for uses that have sensitive daytime activities. Based on the review conducted of nearby sensitive uses (e.g., residences, commercial, office, educational), as shown in Table 4.9-17, the nearby commercial building, Sutter Club, and Growing Mindfully Preschool uses would be exposed to vibration levels that exceed the FTA human annoyance criteria. Applying typical propagation factors to reference levels for a dozer generates impact distances (by receiver use) associated with structural damage of 48 feet for historical structures and 26 feet for typical structures; based on the review conducted of nearby structures (e.g., residences, commercial, office, educational), as shown in Table 4.9-18, the nearby Sutter Club and adjacent Commercial Building would be exposed to vibration levels that exceed the Caltrans' structural damage criteria.

Demolition and future construction could potentially generate excessive vibration levels that exceed FTA's human annoyance criteria and Caltrans' structural damage criteria. This impact would be **potentially significant** for demolition and construction activities.

Mitigation Measures

Mitigation Measure 4.9-2a: Reduce Vibration-Related Disturbance During Demolition and Construction

DGS (for demolition) and the entity implementing future development (e.g., Sacramento State) shall comply with the following measures to reduce vibration-related disturbance at uses located within 58 feet of activities (i.e., the adjacent Commercial Building, Sutter Club, and Growing Mindfully Preschool):

- Demolition/construction activities shall be conducted to minimize human annoyance from vibration at nearby vibration-sensitive uses. The construction contractor shall implement feasible measures to reduce vibration levels. Such measures may include locating vibration-generating equipment as far as practicable from vibration-sensitive uses, sequencing demolition and other ground-impacting activities to avoid simultaneous operation, and using lower-vibration demolition/construction methods where feasible.
- Prior to and during vibration-intensive demolition/construction activities (e.g., use of dozers or impact equipment), vibration monitoring shall be conducted at representative nearby vibration-sensitive uses within 58 feet of demolition/construction work limits to verify compliance with the applicable FTA human-annoyance criteria. If measured vibration levels exceed the applicable FTA criterion, the contractor shall implement additional feasible measures, such as modifying construction methods, increasing equipment setbacks, or reducing the duration or simultaneous operation of vibration-generating activities. If measured background (i.e., without active demolition or construction) levels exceed the FTA limit of 83 VdB, no further monitoring would be required.

Mitigation Measure 4.9-2b: Reduce Potential Structural Damage from Demolition and Construction Vibration

- If permitted by the Sutter Club and owner(s)/tenants of the adjacent Commercial Building, DGS (for demolition) and the entity implementing future development (e.g., Sacramento State) shall retain a licensed structural or

geotechnical engineer to conduct preconstruction surveys of the two adjacent buildings (including photographing and/or videotaping) to document existing building conditions for future comparison if any vibration-related damage is suspected or results from construction/demolition-related activities. DGS and the entity implementing future development can only be responsible for repairs to damage that can be verified as resulting from project activities. Therefore, DGS and the entity implementing future development can only be responsible for repairs where the preconstruction survey is conducted and photographs, videotaping, and other data is collected recording the pre-demolition/pre-construction condition. If the Sutter Club or the owner(s)/tenants of the adjacent Commercial Building do not permit entry or full access to the buildings for implementation of the preconstruction survey, the survey will address areas where access is provided, or if no entry is permitted, exterior areas visible from publicly accessible locations (e.g., sidewalks). As stated above, DGS and the entity implementing future development can only be responsible for repairs to project generated damage where the preconstruction survey has been conducted.

- If the licensed structural or geotechnical engineer determines that façade and/or structural damage may occur during any construction/demolition phase, DGS (for demolition) and the implementing entity (for future construction) shall conduct monitoring during construction/demolition to check for vibration-related damage. Such monitoring may include vibration measurements obtained inside (if permitted) or outside of the buildings or other tests and observations deemed appropriate by the structural or geotechnical engineer.
- Preparation of a vibration monitoring report that summarizes the results of all vibration monitoring during vibration-generating activities located within 48 feet of the offsite buildings (i.e., Sutter Club and adjacent Commercial Building), unless determined otherwise by the licensed structural/geotechnical engineer, shall be submitted to DGS for demolition and the implementing entity for future construction after the completion of each demolition/construction phase within 48 feet of the offsite buildings. The vibration monitoring report shall include a description of the measurement methods and equipment used, calibration certificates, and graphics as required to clearly identify the vibration monitoring locations. An explanation of all events that exceeded vibration limits shall be included together with proper documentation supporting any incidents requiring building repairs, such as documentation of any cosmetic, minor, or major damage as a result of the project-related demolition or construction.
- If any damage to existing buildings is determined to occur because of project demolition or construction, the entity implementing the activity shall be financially responsible for the necessary repairs, structural or cosmetic, to return the damaged building to a condition consistent with the preconstruction survey. Following completion of repairs, a post-repair verification survey shall be conducted by a qualified structural engineer or other licensed professional to confirm that the building has been restored to a condition comparable to the condition recorded during the preconstruction survey. If the verification identifies incomplete or inadequate repairs, additional actions shall be implemented until the structure is restored to a condition consistent with the preconstruction survey.

Significance after Mitigation

Implementation of Mitigation Measure 4.9-2a would require the demolition and construction contractors to employ feasible measures to reduce off-site vibration exposure and disturbance. In addition, vibration monitoring would provide a mechanism to adjust on-site measures, should vibration levels exceed applicable limits. However, while these measures could potentially reduce vibration exposure, not all measures may be deemed feasible by demolition or construction contractors. That is, because for certain demolition and construction activities, there are only limited methods available. And, due to the proximity of nearby receptors, even with reasonable on-site reduction measures, the possibility remains that vibration levels could generate disturbing levels for nearby occupants.

Implementation of Mitigation Measure 4.9-2b would require preconstruction condition surveys, review by a licensed structural or geotechnical engineer, implementation of vibration monitoring, and adherence to applicable vibration limits to protect the Sutter Club and the adjacent Commercial Building. In addition, the measure provides for documentation of vibration monitoring results and repair of any project-related damage. Through implementation of these requirements, vibration-generating activities would be managed to avoid exceedance of applicable vibration criteria to minimize the potential for structural damage, and repair of damage if it does occur.

While impacts from structural damage would be reduced to a less-than-significant level with Miitgation Measure 4.9-2b, impacts from vibration annoyance could still occur at nearby uses and this impact would remain **significant and unavoidable** for both demolition and future construction.

Impact 4.9-3: Long-term Operational Transportation Noise Levels

The project would increase transportation activity through vehicle trips associated with potential campus uses, including housing, retail, hotel, and event-related uses. The project would generate approximately 28,000 additional vehicle miles traveled (VMT) per day, representing an approximately 0.04 percent increase in regional VMT, which would be distributed throughout the Sacramento region. Given the minimal increase in regional VMT, the project would not substantially increase transportation noise levels at existing sensitive receptors. Therefore, the project would not result in a substantial permanent increase in ambient transportation noise or expose residences to excessive transportation noise. Therefore, this impact would be **less than significant**.

The following analysis addresses transportation noise generated by future development. Transportation noise associated with building demolition and construction of future development is incorporated into the analysis in Impact 4.9-1.

The project area is currently developed with institutional uses; transportation noise associated with these uses includes employee and visitor trips and deliveries. The development scenario evaluated in this EIR includes up to 3,630,000 gross square feet of building space. The current vision is a Downtown Sacramento campus of Sacramento State, with various uses being considered, including a school of public affairs, student housing, conference and event center, innovation center and additional academic or cultural uses, hotel, indoor performing arts and music venue, market rate housing, ground floor retail, commercial office space, and structured parking, along with interim uses of the site prior to development (e.g., surface parking, temporary/modular construction). Traffic noise would primarily result from vehicle activity generated by the various land uses. Depending on the specific uses developed, transportation noise sources could include employee, faculty, student, resident, visitor, customer, and event-related vehicle trips; hotel guest and service trips; retail and commercial deliveries; rideshare, taxi, and shuttle activity; and vehicles accessing on-site parking facilities. Event-related uses, including the proposed conference and event center and performing arts and music venue, could result in concentrated vehicle activity during event arrival and departure periods. As the specific mix and intensity of future campus uses have not yet been established, transportation noise effects are evaluated at a programmatic level based on the anticipated overall change in transportation activity associated with potential redevelopment of the project site.

Generating an increase in the existing ambient noise environment that could exceed the established land use-based CNEL/L_{dn} standards shown in Table 4.9-3, the human perception increase standard of 5 dBA, or exceeding the interior noise standards of 45 dBA CNEL/L_{dn} (uses where people sleep), would result in a significant impact.

Implementation of the project would generate an estimated 28,482 VMT daily (based on project modelling conducted by Fehr & Peers as part of the project analysis [Fehr & Peers 2026]), increasing regional VMT from 64,565,773 VMT under existing conditions to 64,594,255 VMT under the existing-plus-project condition, which equates to an overall 0.04 percent increase in VMT within the project-affected roadway network (e.g., City of Sacramento, surrounding communities). The approximate 0.04 percent increase in VMT would be distributed throughout Sacramento and other nearby communities and would not represent a uniform increase in traffic on all roadways. Accordingly, changes in traffic volumes would vary across individual roadway segments depending on the distribution of project-generated trips. However, given the minimal increase in VMT, implementation of the project would not be expected to substantially increase existing transportation noise levels at existing sensitive receptors. Although individual roadways could experience changes in traffic volumes associated with project-generated travel, the overall change in regional VMT would be negligible relative to existing transportation activity.

Transportation noise levels are primarily influenced by the volume of traffic on a roadway, vehicle speeds, vehicle types, roadway characteristics, and the distance between the roadway centerline and noise-sensitive receptors. For example, typical downtown roadway traffic volumes range from approximately 500 to 84,000 vehicles per day, resulting in transportation noise levels of 61 dBA L_{dn} and 72 dBA L_{dn} at 100 feet from the centerline of the roadway. An

approximate 0.04 percent increase in these values would equate to 520 to 87,360 vehicles per day and noise levels of approximately 61.2 dBA L_{dn} and 72.2 dBA L_{dn}. As demonstrated by this example, applying all of the project-generated increase to one segment results in an imperceptible (i.e., less than 1 dB) change in noise levels. Therefore, regardless of what existing noise levels are on any individual roadway, the project would not result in traffic increases large enough to noticeably change existing noise levels relative to the adopted CNEL/L_{dn} standards by land use (Table 4.9-3) or result in a 5 dBA increase. Moreover, the project site is located within an urbanized area of Downtown Sacramento that experiences relatively high levels of transportation noise associated with it. As such, the project would not be expected to result in a substantial permanent increase in ambient transportation noise levels, nor expose residences to excessive transportation noise levels. Therefore, existing receptors would not be exposed to noise levels or noise level increases that exceed applicable City of Sacramento noise standards. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.9-4: Long-Term Operational Stationary Noise Levels

Operation of the proposed project would generate noise from mechanical equipment, backup generators, building mechanical equipment, and event-related uses. The project would also introduce new sensitive land uses (i.e., residential, hotel) that could potentially be exposed to noise levels that exceed allowable interior noise standards. Noise associated with HVAC equipment, parking structures, and events would not exceed applicable residential exterior daytime or nighttime standards for offsite receptors. Noise from backup generators could exceed daytime and nighttime standards at offsite residential receptors. Depending on the location of new sensitive land uses and onsite noise sources, new sensitive receptors could potentially be exposed to noise levels that could exceed interior noise standards as a result of noise generated from HVAC equipment, backup generators, music/events. This impact would be **potentially significant.**

This impact analysis examines the potential exposure of existing and planned sensitive receptors (i.e., residential, hotel) to noise generated by non-transportation stationary source associated with project operations. Therefore, this impact discussion focusses exclusively on the operation of future development and is not associated with demolition activities. The development scenario evaluated in this EIR is a Downtown Sacramento campus of Sacramento State, with various uses being considered, including a school of public affairs, student housing, conference and event center, innovation center and additional academic or cultural uses, hotel, indoor performing arts and music venue, market rate housing, commercial office, ground floor retail, and structured parking, along with interim uses of the site prior to development (e.g., surface parking, temporary/modular construction). Potential noise sources associated with these uses include building mechanical equipment (HVAC systems, exhaust fans), parking structures, diesel backup generators, and noise associated with the music and event venue use.

The City of Sacramento has established exterior noise standards applicable to existing residential uses which are used to evaluate project-generated noise on existing nearby residential uses and interior noise standards applicable to new sensitive uses where people sleep (e.g., residences, hotel), which are applied to project-proposed sensitive uses as a compatibility assessment. The standards applied in this analysis are summarized below:

Project-Generated Stationary Noise Standards Applicable to Existing to Residential Uses:

- Daytime (7:00 a.m. to 10:00 p.m.): 55 dBA L_{eq} and 75 dBA L_{max}
- Nighttime (10:00 p.m. to 7:00 a.m.): 50 dBA L_{eq} and 70 dBA L_{max}

Interior noise standards applicable to new uses where people sleep (i.e., residences, hotels):

- Interior noise standard: 45 dba L_{eq}

Because the numerical L_{eq} standard is much lower than the L_{max} standards, the modeled impact distances for each source associated with an L_{eq} are greater than an L_{max}. For this reason, compliance with the L_{eq} standard would also comply with L_{max} standard and only L_{eq} levels are presented in this analysis. Each noise source is evaluated separately, below.

Building Mechanical Equipment

Redevelopment of the project site after demolition would introduce new stationary noise sources associated with building mechanical equipment, primarily HVAC units. Detailed information regarding the location and type of stationary equipment to be installed is not available at this time. However, noise from air conditioning systems can reach up to 78 dB at 3 feet (Lennox 2019). Applying this reference noise level as an hourly average (L_{eq}) and assuming a 50 percent usage rate would result in a 75 dBA L_{eq} at 3 feet from the source.

Commonly installed building equipment, such as HVAC systems, can be located in the interior of the structure, on rooftops, or in direct line of sight of adjacent land uses. Based on the reference noise level for HVAC units of 78 dBA L_{max} and 75 dBA L_{eq} at 3 feet, and assuming typical attenuation rates, from distance alone, noise from HVAC units would reduce to the daytime standard of 55 dBA L_{eq} at 30 feet and the nighttime standard of 50 dBA L_{eq} at 55 feet.

Based on the review of nearby sensitive land uses, the Capitol Towers apartment complex is the nearest residential use to the project site, at 125 feet, when measuring the nearest project site boundary to the nearest receptor façade. Thus, HVAC equipment operating noise would not exceed daytime or nighttime standards at any offsite residential land use.

Regarding new sensitive land uses (i.e., residences, hotels) associated with the project, interior noise standards are 45 dBA L_{eq}. Assuming exterior reductions of "typical" building construction can readily achieve 25 dBA reductions. In newer construction, higher reductions are achievable; however, applying the more conservative reduction, new residential or hotel receptors would need to be directly adjacent to operating HVAC equipment to exceed interior noise standards (i.e., 45 interior standard + 25 building reduction = 70 dba exterior, which is achieved at 6 feet from an HVAC unit). While it is likely that HVAC equipment would not result in interior noise exceedances, because locations, unit types, and their proximity to new sensitive receptors are unknown, there remains a possibility that new sensitive receptors could be located in proximity to HVAC equipment such that interior noise standards are not met. This is a potentially significant impact.

Diesel Backup Generators

Backup diesel generators could be used to supply the power required by vital systems within future buildings during emergency power outages or routine maintenance. As backup generators only operate in the case of emergencies and based on typical hours of operation for potential uses, the noise generated by backup generators are compared to both the daytime and nighttime noise standards (i.e., 55 dBA L_{eq} during daytime hours and 50 dBA L_{eq} during nighttime hours).

A typical diesel-powered backup generator has a reference noise level of 78 dBA Leq and 82 dBA L_{max} at 50 feet (FTA 2018). Applying this reference noise level and typical attenuation rates, generator noise would attenuate to levels below the applicable daytime and nighttime noise standards at distances of 705 feet and 1,254 feet, respectively. As described and shown in Figure 4.9-1, existing residential receptors are located within these distances. As also explained above, intervening buildings reduce noise levels at further distances such that noise perception further from the generators would be lower. Nonetheless, residential receptors are located within these distances (e.g., Studios at the Berry Hotel, Capital Towers, The Frederic). See Table 4.9-7 for full list.

Regarding new sensitive land uses (i.e., residences, hotels) associated with the project, interior noise standards are 45 dBA L_{eq}. Assuming a conservative (i.e., lesser reduction) exterior-to-interior noise reduction of 25 dBA, the interior noise standard of 45 dBA L_{eq} would be exceeded if backup generator noise occurs within 125 feet of the new sensitive uses. Considering that the specific locations of each use and the generators are unknown, it is possible that noise associated with generators would exceed interior noise standards at new sensitive uses. This is a potentially significant impact.

Parking Structure

The proposed development scenario would allow for the potential development of structured parking to serve the hotel, market-rate residential housing, and student housing components. Structured parking generates various noise

sources including vehicular traffic-related noise, car doors closing, people talking, horns honking, engines starting, engines idling, car alarms, and radios sounding. These noise sources are typically short and intermittent. In addition, noise levels in parking structures tend to rise with peak hour traffic, and larger parking facilities typically generate more noise than smaller ones. The environment surrounding the project site consists of typical urban features, such as office buildings, commercial uses, and existing parking garages (e.g., SP Parking at 520 Capitol Mall, parking at 555 Capitol Mall, structured parking included in the US Bank Tower at 621 Capitol Mall). The development of structured parking would not introduce new or unique noise sources to the existing noise environment. Therefore, operation of the parking lot would not result in excessive noise at adjacent receptors, nor would it result in a substantial change in the existing noise environment. This would be a less than significant impact.

Indoor Performing Arts and Music Venue and Conference and Event Center

The proposed development scenario would allow for the potential development of an Indoor Performing Arts and Music Venue and a Conference and Event Center. While specific event types and durations of each are unknown, it is conceivable that some events could either extend into the nighttime hours (i.e., after 10:00 p.m.) or end close enough to 10:00 p.m. such that noise associated with people outside of the facility occurs at night.

Regarding noise associated with events inside the structures, music and event venues are typically designed with acoustically isolated building envelopes to minimize the transmission of amplified music and other interior sound to exterior areas. This includes appropriately designed exterior walls, roofs, doors, windows, and other openings, with particular consideration given to low-frequency sound associated with amplified music. Accordingly, noise generated within the venue would be substantially contained within the building and would not be expected to result in substantial noise levels at nearby exterior sensitive receptors. For these reasons, this analysis focusses on noise associated with events that could occur outside of the venue from people talking and congregating.

Outdoor noise associated with attendees congregating outside before or after an event could contribute to noise levels at adjacent or newly developed sensitive receptors (i.e., residences, hotels). These noise sources would primarily consist of conversational speech, laughter, shouting, and general crowd movement. Attendees of an event typically arrive at different times, and even when there is an entry line, not all attendees are outside the event venue at the same time. Attendees exiting events are more likely to exit the facility at near the same time and may congregate outside. Although most events are anticipated to end before 10:00 p.m., outdoor congregating noise could persist beyond that time. As a result, outdoor noise was evaluated for both the daytime and nighttime noise standards.

Based on reference noise levels for people conversing in loud environments (e.g., people talking loud enough to be heard over background noise such as crowds or vehicle traffic), noise levels could be 73 dBA L_{eq} at 7 feet (EPA 1977). Applying standard distance attenuation calculations, noise from people outside would reduce to the daytime standard of 55 dBA L_{eq} at 56 feet and the nighttime standard of 50 dBA L_{eq} at 100 feet. Based on the review of nearby sensitive land uses conducted, the Capitol Towers is the nearest residential use to the project site (i.e., 125 feet from the nearest project site boundary to receptor façade). From distance alone, daytime and nighttime standards would not be exceeded at offsite residential uses from outdoor noise associated with the Indoor Performing Arts and Music Venue or Conference and Event Center.

Regarding new residential land uses associated with the project, interior noise standards are 45 dBA L_{eq}. Assuming a conservative (i.e., lower reduction) exterior-to-interior noise reduction of 25 dBA the interior noise standard of 45 dBA L_{eq} would be exceeded if outdoor noise associated with an event occurs within 100 feet of the new residential land uses. Considering that the specific location of each use are unknown and understanding that people outside the venue may generate noise beyond the wall of the actual event structure, it is possible that noise associated with people entering/leaving an event could occur within 100 feet of onsite residential uses. This is a potentially significant impact.

Conclusion

HVAC equipment would not exceed applicable daytime or nighttime exterior noise standards at existing offsite residential uses. For new onsite residential and hotel uses, HVAC noise would generally be expected to comply with the 45 dBA interior standard; however, because equipment and receptor locations are not yet known, the potential for interior noise exceedances cannot be ruled out. Generator noise could exceed applicable daytime and nighttime exterior noise standards at existing offsite residential uses. For new onsite residential and hotel uses, generator noise

could also exceed the 45 dBA L_{eq} interior standard depending on the proximity of generators to sensitive uses. Noise from structured parking would be intermittent and consistent with existing urban parking activities and would not result in excessive noise at adjacent existing receptors or a substantial change in the existing noise environment. Noise generated inside the music and event uses would be substantially contained by the building envelope and would not be expected to substantially affect existing offsite sensitive receptors. However, outdoor noise from people arriving, leaving, and congregating could affect new onsite residential uses where such activity occurs in close proximity to sensitive receptors.

In summary, noise associated with backup generators could result in noise levels that exceed applicable daytime (55 dba L_{eq}) and nighttime (50 dBA L_{eq}) standards at offsite existing residential uses. Noise associated with HVAC equipment, backup generators, and the music/event use could result in noise levels that exceed interior noise standards of 45 dba L_{eq} at new sensitive uses included as part of the proposed project (i.e., residential, hotel). This impact would be **potentially significant**.

Mitigation Measures

Mitigation Measure 4.9-4a: Implement Stationary Noise Reduction Methods to Reduce Backup Generator and HVAC Noise

The entity implementing future development (e.g., Sacramento State) shall implement the following measures to reduce potential noise impacts associated with the operation of backup generators:

- Prior to approval of building plans for any new development that includes a backup generator, the entity implementing the development shall demonstrate that the generator and associated equipment have been designed and will be operated such that noise at the property line of existing residential uses would not exceed applicable standards of 50 dBA L_{eq} during nighttime hours. The noise analysis shall account for the generator, exhaust, ventilation, and other associated equipment and shall incorporate feasible noise-control measures, as necessary, including acoustical enclosures, silencers, barriers, or other equipment modifications. Enclosures and/or barriers can reduce noise substantially (i.e., 10 dBA or more)
- Prior to operation, the entity implementing the development shall verify through field testing or other documentation that the generator complies with the applicable 50 dBA L_{eq} exterior noise standard at existing residential uses. The requirement shall apply to residential uses existing at the time of development and shall be incorporated into project plans and verified by the land use agency with authority over the project.
- Prior to approval of building plans for any new development, the entity implementing the development shall demonstrate that HVAC and other building mechanical equipment have been located and/or designed such that noise levels from this equipment at any residential or hotel uses included as part of the proposed project would not exceed applicable standards of 50 dBA Leq during nighttime hours.

Mitigation Measure 4.9-4b: Implement Noise Reduction Methods to Reduce Exterior Noise Associated with the Conference and Event Center and Performing Arts and Music Venue

The entity implementing future development (e.g., Sacramento State) shall implement the following measures to reduce potential noise impacts associated with the operation of the Conference and Event Center and Performing Arts and Music Venue:

- Prior to approval of building plans for new residential or hotel uses, the entity implementing the development shall incorporate noise-compatible site planning and building design measures to minimize exposure of future sensitive receptors to noise from outdoor activity associated with event spaces. Measures may include locating new residential and hotel uses as far as practicable from the public entrances to, and exits from, the Conference and Event Center and Performing Arts and Music Venue; orienting noise-sensitive rooms away from these noise sources; locating less-sensitive uses, such as corridors, bathrooms, kitchens, and other non-habitable spaces, along noise-exposed façades; and using intervening buildings or other site features to provide shielding.

- Where these measures alone would not ensure adequate separation distance between new sensitive uses and noise sources associated with other development(i.e., 6 feet for HVAC units, 125 feet for backup generators, 100 feet for music/event venues), the entity implementing the future development shall incorporate additional building-envelope measures sufficient to ensure that interior noise levels within noise-sensitive rooms do not exceed 45 dBA L_{eq}. Such measures may include enhanced exterior wall and roof assemblies, upgraded windows with greater sound transmission loss, acoustically rated doors, reduced or acoustically treated exterior openings, and mechanical ventilation systems that allow windows to remain closed. Prior to occupancy of residential and hotel land uses, the entity implementing the development shall demonstrate through an acoustical analysis or other documentation that the proposed design provides sufficient exterior-to-interior noise reduction to meet the 45 dBA L_{eq} interior standard based on event-related noise sources existing at the time of development, or planned after the residential or hotel development.

Significance after Mitigation

Implementation of Mitigation Measure 4.9-4a would require that new diesel backup generators and HVAC equipment are designed and located to reduce noise conflicts to the extent technologically available through the use of increased distance between the noise source and sensitive receptors, enclosures, barriers, or specific generator technology chosen. Compliance with residential nighttime standards of 50 dBA L_{eq} would ensure compliance with daytime standards which would be verified by field testing, or other appropriate documentation, such that offsite residential uses would not be exposed to noise levels that exceed the daytime or nighttime noise standards. Mitigation Measure 4.9-4b would promote good planning practices to avoid conflicts between sensitive land uses (i.e., residential, hotel) and event related noise generation. Further, new construction has the ability to achieve higher than standard exterior-to-interior noise reduction with improved building design practices and materials (e.g., triple-pane windows), and noise computability would be verified prior to occupancy. For these reasons, implementation of mitigation measures would reduce noise to below applicable standards and this impact to a **less-than-significant** level.

4.10 GEOLOGY AND SOILS

This section describes current conditions relative to geology and soils at the Capitol Mall Office Buildings Demolition project site. It includes a description of soils and mineral resources and analysis of environmental effects of the proposed project on soils and resulting from potential seismic activity.

No comment letters regarding geology and soils were received in response to the Notice of Preparation (see Appendix A).

4.10.1 Regulatory Setting

FEDERAL

National Earthquake Hazards Reduction Act

In October 1977, the US Congress passed the Earthquake Hazards Reduction Act to reduce the risks to life and property from future earthquakes in the United States. To accomplish this, the act established the National Earthquake Hazards Reduction Program (NEHRP). The mission of NEHRP includes improved understanding, characterization, and prediction of hazards and vulnerabilities; improved building codes and land use practices; risk reduction through post-earthquake investigations and education; development and improvement of design and construction techniques; improved mitigation capacity; and accelerated application of research results. The NEHRP designates the Federal Emergency Management Agency (FEMA) as the lead agency of the program and assigns several planning, coordinating, and reporting responsibilities.

STATE

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act of 1972 (Public Resources Code [PRC] Section 2621-2630) intends to reduce the risk to life and property from surface fault rupture during earthquakes by regulating construction in active fault corridors, and by prohibiting the location of most types of structures intended for human occupancy across the traces of active faults. The act defines criteria for identifying active faults, giving legal support to terms such as active and inactive, and establishes a process for reviewing building proposals in Earthquake Fault Zones. Under the Alquist-Priolo Act, faults are zoned and construction along or across these zones is strictly regulated if they are "sufficiently active" and "well-defined." A fault is considered sufficiently active if one or more of its segments or strands shows evidence of surface displacement during Holocene time (defined for purposes of the act as within the last 11,000 years). A fault is considered well defined if its trace can be clearly identified by a trained geologist at the ground surface or in the shallow subsurface, using standard professional techniques, criteria, and judgment (Bryant and Hart 2007). Before a project can be permitted in a designated Alquist-Priolo Earthquake Fault Zone, cities and counties must require a geologic investigation to demonstrate that proposed buildings would not be constructed across active faults. The law addresses only the hazard of surface fault rupture and is not directed toward other earthquake hazards.

Seismic Hazards Mapping Act

The objective of the Seismic Hazards Mapping Act of 1990 (PRC Section 2690–2699.6) is to reduce damage resulting from earthquakes. While the Alquist-Priolo Act addresses surface fault rupture, the Seismic Hazards Mapping Act addresses other earthquake-related hazards, including ground shaking, liquefaction, and seismically induced landslides. The act's provisions are similar in concept to those of the Alquist-Priolo Act: The State is charged with identifying and mapping areas at risk of strong ground shaking, liquefaction, landslides, and other corollary hazards, and cities and counties are required to regulate development within mapped Seismic Hazard Zones. Under the Seismic Hazards Mapping Act, permit review is the primary mechanism for local regulation of development.

California Building Code

The California Building Code (CBC) (California Code of Regulations, Title 24) is based on the International Building Code. The CBC has been modified from the International Building Code for California conditions, with more detailed and/or more stringent regulations. Specific minimum seismic safety and structural design requirements are set forth in Chapter 16 of the CBC. The CBC identifies seismic factors that must be considered in structural design. Chapter 18 of the CBC regulates the excavation of foundations and retaining walls, while Chapter 18A regulates construction on unstable soils, such as expansive soils and areas subject to liquefaction. Appendix J of the CBC regulates grading activities, including drainage and erosion control. The CBC contains a provision that provides for a preliminary soil report to be prepared to identify "…the presence of critically expansive soils or other soil problems which, if not corrected, would lead to structural defects" (CBC Chapter 18 Section 1803.1.1.1).

Paleontological Resources: California Public Resources Code

The PRC protects paleontological resources through Section 5097.5 which prohibits "knowing and willful" excavation, removal, destruction, injury, and defacement of any paleontological feature on public lands (lands under state, county, city, district, or public authority jurisdiction, or the jurisdiction of a public corporation), except where the agency with jurisdiction has granted permission.

LOCAL

The Capitol Mall Office Buildings Demolition Project site is located in downtown Sacramento on State-owned property. The demolition would be implemented by DGS, and future construction and use would be implemented by the land recipient, presumed to be the California State University, Sacramento (Sacramento State or the University) for a Downtown Sacramento campus of Sacramento State. As explained in Section 4.2, "Land Use and Planning," of this Draft EIR, in Section 4.2.1, "Regulatory Setting," the State is exempt from complying with local plans, policies, and zoning regulations. Nevertheless, in the exercise of its discretion as lead agency and as a State agency, DGS references, describes, and addresses in this EIR local plans, policies and regulations to the extent they are applicable to the project. This evaluation is also intended to be used by local agencies for determining, as part of their permit processes, the project's consistency with local plans, policies, and regulations.

City of Sacramento 2040 General Plan

The Environmental Resources and Constraints Element of the City of Sacramento 2040 General Plan outlines the City of Sacramento's (City's) goals and policies regarding seismic and geologic hazards. The following policies may be applicable to the Capitol Mall Office Buildings Demolition Project (City of Sacramento 2025).

- ERC-7.1 Expansive Soils and Liquefaction. In areas of expansive soils and high liquefaction risk, the City shall continue to require that project proponents submit geotechnical investigation reports and demonstrate that the project conforms to all recommended mitigation measures prior to City approval.
- ERC-7.2 Seismic Stability. In accordance with the California Building Code, the City shall regulate structures intended for human occupancy to ensure they are designed and constructed to retain their structural integrity when subjected to seismic activity

4.10.2 Environmental Setting

REGIONAL GEOLOGY

The Capitol Mall Office Buildings Demolition Project is located in the Sacramento Valley in the northern portion of the Great Valley geomorphic province. The Great Valley geomorphic province is an alluvial plain about 50 miles wide and 400 miles long in the central part of California and is a trough in which sediments have been deposited almost continuously since the Jurassic Period. A "geomorphic province" is comprised of an area of similar geologic origin

and erosional and depositional history. Its northern area is the Sacramento Valley, drained by the Sacramento River, and its southern area is the San Joaquin Valley, drained by the San Joaquin River.

The Sacramento Valley is bounded by the foothills of the Sierra Nevada range to the east, the Coast Ranges to the west, and the Cascade Range and Klamath Mountains to the north. The geology of the Great Valley geomorphic province incorporates thick sequences of alluvial sediments derived primarily from erosion of the Sierra Nevada range to the east, and to a lesser extent from erosion of the Cascade and Klamath mountain ranges to the north. Sediments from these mountain ranges were transported downstream and laid down as river channel and floodplain deposits and alluvial fans.

The Sacramento Valley is an alluvial plain composed of a deep sequence of sediments derived from erosion of the Coast Ranges to the west and Sierra Nevada Mountains to the east, within the confines of a structural trough. The thickness of the alluvial deposits beneath the project site is approximately 8,000 feet (Hackel 1966: Figure 1); however, a minimum of 60,000 feet of Mesozoic sediments consisting of siltstone, claystone, and sandstone of predominantly marine origin were laid down in the area west of the present margin of the Sacramento Valley (Hackel 1966), and west of the project site. The uppermost part of the alluvial plain is comprised of Holocene age Basin Deposits and Pleistocene age Riverbank Formation sediments, both alluvial in origin. These alluvial deposits are underlain by undifferentiated early Tertiary age marine deposits which overlie upper Cretaceous age deposits of the Great Valley Sequence. The sedimentary sequence rests on a basement complex composed of metamorphosed Paleozoic and Mesozoic sediments, volcanics, and granites extending west from the Sierra Nevada (Hackel 1966).

LOCAL GEOLOGY

The project site, which is located less than 1 mile from the Sacramento River to the west and less than 2 miles from the American River to the north, is underlain by Holocene Alluvium (Qa), described as unweathered gravel, sand, and silt deposited by present-day stream and river systems that drain the Coast Ranges, Klamath Mountains, and Sierra Nevada.

TOPOGRAPHY AND DRAINAGE

The project site is in a flat, urban area devoid of slopes. The site has been graded as part of urban development and contains landscaped areas and impervious surfaces, including paved pathways and sidewalks. Both natural drainage and drainage to existing stormwater infrastructure occurs at the project site. All stormwater enters the City of Sacramento Combined Sewer System, which collects and conveys both stormwater and wastewater.

GROUNDWATER

The Sacramento area is underlain by geologic formations that include an upper, unconfined groundwater/aquifer system (able to receive water that infiltrates from the surface) and a lower, semiconfined groundwater/aquifer system (infiltration of water can be partially blocked by impermeable layers). Depth to groundwater in the downtown area varies seasonally but is relatively shallow (can be less than 10 feet to the water table), with no predominant direction of groundwater flow (Sacramento Central Groundwater Authority 2012).

SOILS

The project site and surrounding area in downtown Sacramento are completely developed, with street trees and ornamental landscaping. The project site is classified as urban land by the US Natural Resources Conservation Service's Web Soil Survey (USDA 2026). Natural soil complexes that made up the original, unaltered soil horizon have been truncated, mixed, or otherwise altered. Where native soils still exist, soil types are expected to be similar to those of nearby areas, consisting of Columbia-Urban land complex, drained, 0 to 2 percent slopes (USDA 2026). The typical profile of these soils include sandy loam found between 0 and 11 inches, stratified loamy sand to silt loam between 11 to 43 inches, and clay loam between 43 to 64 inches. These soils are somewhat poorly drained, have a very low runoff class, and have a rare frequency of flooding.

SUBSIDENCE AND DYNAMIC COMPACTION

Land subsidence is the gradual settling or sinking of an area with very little horizontal motion. Subsidence can be induced by both natural and human phenomena. Natural phenomena include shifting of tectonic plates and dissolution of limestone resulting in sinkholes. Human activities that can contribute to or cause subsidence include pumping water, oil, and gas from underground reservoirs; collapse of underground mines; drainage of wetlands; and soil compaction. The project site is not located in an area of land subsistence due to groundwater pumping, peat loss, or oil extraction (USGS 2026). Dynamic compaction, or seismic settlement, can also occur as a result of seismic shaking. It typically occurs in the layers above groundwater, in unsaturated, loose, granular material or uncompacted fill soils.

EXPANSIVE SOILS

Expansive soils (also known as shrink-swell soils) are soils that contain expansive clay minerals that can absorb significant amounts of water. The presence of these clay minerals makes the soil prone to large changes in volume in response to changes in water content. When an expansive soil becomes wet, water is absorbed and it increases in volume, and as the soil dries it contracts and decreases in volume. This repeated change in volume over time can produce enough force and stress on buildings, underground utilities, and other structures to damage foundations, pipes, and walls. The quantity and type of expansive clay minerals affect the potential for the soil to expand or contract. Where native soils still exist, soil types may be expected to be similar to those of the nearby areas. The shrink-swell potential of nearby native soils is considered low between 1 and 43 inches and high between 43 and 64 inches (USDA 2026).

MASS WASTING AND LANDSLIDES

Mass wasting refers to the collective group of processes that characterize down slope movement of rock and unconsolidated sediment overlying bedrock. These processes include landslides, slumps, rockfalls, flows, and creeps. Many factors contribute to the potential for mass wasting, including geologic conditions as well as the drainage, slope, and vegetation of the site. The project site is located on a topographically flat area on the valley floor in the floodplain of the Sacramento River, where landslides typically would not occur. Therefore, the potential for landslides or slope instability is considered low.

SEISMICITY

Most earthquakes originate along fault lines. A fault is a fracture in the Earth's crust along which rocks on one side are displaced relative to those on the other side due to shear and compressive crustal stresses. Most faults are the result of repeated displacement that may have taken place suddenly and/or by slow creep (Bryant and Hart 2007: 3). The state of California has a classification system that designates faults as either active, potentially active, or inactive, depending on how recently displacement has occurred along them. Faults that show evidence of movement within the last 11,000 years (the Holocene geologic period) are considered active, and faults that have moved between 11,000 and 1.6 million years ago (comprising the later Pleistocene geologic period) are considered potentially active.

A review of available published geologic and seismic hazards maps indicates that there are no known active faults identified in or adjacent to the City of Sacramento. The site is not located in an Alquist-Priolo Earthquake Fault Zone, and no mapped active or potentially active fault traces are known to traverse or project toward the site. The mapped fault closest to the project site is the Green Valley Fault System (CGS 2026a). In addition, there has been no documented movement on faults mapped in Sacramento County during the past 150 years. However, the region has experienced numerous instances of groundshaking originating from faults in other areas. The closest known potentially active fault mapped by the California Geological Survey is the Dunnigan Hills fault located about 20 miles northwest of Sacramento, with the closest branches of the seismically active San Andreas Fault System (Historic activity, i.e., within the last 200 years) being the Green Valley and Concord faults, 43 and 50 miles to the southwest, respectively. The main trace of the San Andreas Fault System is approximately 80 miles to the southwest (CGS 2026b).

Seismic hazards resulting from earthquakes include surface fault rupture, ground shaking, and liquefaction. Each of these potential hazards is discussed below.

Surface Fault Rupture

Surface rupture is the surface expression of movement along a fault. Structures built over an active fault can be torn apart if the ground ruptures. The potential for surface rupture is based on the concepts of recency and recurrence. Surface rupture along faults is generally limited to a linear zone a few meters wide. The Alquist-Priolo Act (see the Regulatory Setting discussion above) was created to prohibit the location of structures designed for human occupancy across, or within 50 feet of, an active fault, thereby reducing the loss of life and property from an earthquake. The project site is not located within an Alquist-Priolo active fault zone. The nearest fault zone is the Green Valley Fault Zone located approximately 40 miles east of the project site and there is no evidence of active faulting within or near the project site (CGS 2026b).

Ground Shaking

The intensity of seismic shaking, or strong ground motion, during an earthquake is dependent on the distance and direction from the epicenter of the earthquake, the magnitude of the earthquake, and the geologic conditions of the surrounding area. Ground shaking could potentially result in the damage or collapse of buildings and other structures. Earthquake intensities generally associated with this amount of ground shaking are typically between VI and VII on the Modified Mercalli Intensity Scale (MMI) (Table 4.10-1). An expected characteristic earthquake on the entire San Andreas Fault System is a Moment Magnitude scale (Mw) of 7.9 and is probably the largest earthquake that would be felt in the project site. Given the distance between the San Andreas Fault and the project site, the felt intensity would be expected to be between MMI VII and VIII (CGS 2026c). However, a felt intensity between MMI VII and VIII would be caused by a characteristic earthquake on the Dunnigan Hills fault of Mw 6.6 because it is much closer to the project area. Based in data from the CGS (2026d), the project site would be expected to have 2 percent chance in 50 years to experience a ground motion of 0.351 g and a 10 percent chance in 50 years to experience ground motion of 0.206.

Table 4.10-1 The Modified Mercalli Scale of Earthquake Intensities

If most of these effects are observed	Then the intensity is
Earthquake shaking is not felt but people may observe marginal effects of large distance earthquakes without identifying these effects as earthquake caused. Among them: trees, liquids, bodies of water sway slowly, or doors swing slowly.	I
Effect on people: Shaking felt by those at rest, especially if they are indoors, and by those on upper floors.	II
Effect on people: Felt by most people indoors. Some can estimate duration of shaking but many may not recognize shaking of building as caused by an earthquake; the shaking is like that caused by the passing of light trucks.	III
Other effects: Hanging objects swing. Structural effects: Windows or doors rattle. Wooden walls and frames creak.	IV
Effect on people: Felt by everyone indoors and by most people outdoors. Many now estimate not only the duration of shaking but also its direction and have no doubt as to its cause. Sleepers wakened. Other effects: Hanging objects swing. Standing autos rock. Crockery clashes, dishes rattle or glasses clink. Structural effects: Doors close, open or swing. Windows rattle.	V
Effect on people: Felt by everyone indoors and by most people outdoors. Many now estimate not only the duration of shaking but also its direction and have no doubt as to its cause. Sleepers wakened. Other effects: Hanging objects swing. Shutters or pictures move. Pendulum clocks stop, start, or change rate. Standing autos rock. Crockery clashes, dishes rattle or glasses clink. Liquids disturbed, some spilled. Small unstable objects displaced or upset. Structural effects: Weak plaster and Masonry D* crack. Windows break. Doors close, open, or swing.	VI

If most of these effects are observed	Then the intensity is
Effect on people: Felt by everyone. Many are frightened and run outdoors. People walk unsteadily. Other effects: Small church or school bells ring. Pictures thrown off walls, knickknacks and books off shelves. Dishes or glasses broken. Furniture moved or overturned. Trees, bushes shaken visibly, or heard to rustle. Structural effects: Masonry D* damaged; some cracks in Masonry C*. Weak chimneys break at roof line. Plaster, loose bricks, stones, tiles, cornices, unbraced parapets, and architectural ornaments fall. Concrete irrigation ditches damaged.	VII
Effect on people: Difficult to stand. Shaking noticed by auto drivers. Other effects: Waves on ponds; water turbid with mud. Small slides and caving in along sand or gravel banks. Large bells ring. Furniture broken. Hanging objects quiver. Structural effects: Masonry D* heavily damaged; Masonry C* damaged, partially collapses in some cases; some damage to Masonry B*; none to Masonry A*. Stucco and some masonry walls fall. Chimneys, factory stacks, monuments, towers, elevated tanks twist or fall. Frame houses move on foundation if not bolted down; loose panel walls thrown out. Decayed piling broken off.	VIII
Effect on people: General fright. People thrown to ground. Other effects: Changes in flow or temperature of springs and wells. Cracks in wet ground and on steep slopes. Steering of autos affected. Branches broken from trees. Structural effects: Masonry D* destroyed; Masonry C* heavily damaged, sometimes with complete collapse; Masonry B* is seriously damaged. General damage to foundations. Frame structures, if not bolted, shifted off foundations. Frames cracked. Reservoirs seriously damaged. Underground pipes broken.	IX
Effect on people: General panic. Other effects: Conspicuous cracks in ground. In areas of soft ground, sand is ejected through holes and piles up into a small crate, and, in muddy areas, water fountains are formed. Structural effects: Mast masonry and frame structures destroyed along with their foundations. Some well-built wooden structures and bridges destroyed. Serious damage to dams, dikes, and embankments. Railroads bent slightly.	X
Effect on people: General panic. Other effects: Large landslides. Water thrown on banks of canals, rivers, lakes, etc. Sand and mud shifted horizontally on beaches and flat land. Structural effects: General destruction of buildings. Underground pipelines completely out of service. Railroads bent greatly.	XI
Effect on people: General panic. Other effects: Same as for Intensity X. Structural effects: Damage nearly total, the ultimate catastrophe. Other effects: Large rock masses displaced. Lines of sight and level distorted. Objects thrown into air.	XII

Notes:

* Masonry A: Good workmanship and mortar, reinforced, designed to resist lateral forces.

* Masonry B: Good workmanship and mortar, reinforced.

* Masonry C: Good workmanship and mortar, unreinforced.

* Masonry D: Poor workmanship and mortar and weak materials, like adobe.

Source: USGS 2021.

Liquefaction and Lateral Spreading

Liquefaction is a phenomenon in which loose, saturated, granular soil deposits lose a significant portion of their shear strength because of excess pore water pressure buildup. An earthquake can cause an increase in pore water pressure and subsequent liquefaction. These soils then behave like a liquid during seismic shaking and re-solidify when shaking stops. The potential for liquefaction is highest in areas with high groundwater and loose, fine, sandy soils at depths of less than 50 feet. The downtown and west Sacramento areas, including the project site, are mapped within a liquefaction zone according to the California Geological Survey (2026a).

Liquefaction may also lead to lateral spreading. Lateral spreading (also known as expansion) is the horizontal movement or spreading of soil toward an "open face," such as a streambank, the open side of fill embankments, or the sides of levees. It often occurs in response to liquefaction of soils in an adjacent area. The potential for failure from lateral spreading is highest in areas where there is a high groundwater table, where there are relatively soft and

recent alluvial deposits, and where creek banks are relatively high. The Sacramento River is located approximately 0.5 miles to the west of the project site and could offer a potential opportunity for lateral spreading. However, because the project site and vicinity are on flat terrain and relatively distant from the Sacramento River, lateral spreading caused by liquefaction is not expected to be a concern.

PALEONTOLOGY SETTING

The project site is located in the Sacramento Valley at an elevation of 15 feet in the Sacramento River floodplain in downtown Sacramento. The depositional history of the Sacramento Valley during the late Quaternary period (1.6 million years ago to the present) included several cycles related to fluctuations in regional and global climate that caused alternating periods of deposition followed by periods of subsidence and erosion. The poorly to moderately sorted sand, gravel, and silt was deposited along the Sacramento River floodplain during the last 11,700 years. Holocene-age deposits, like the alluvial deposits underlying the project site, are considered to have a low paleontological potential because they are geologically immature and are unlikely to have fossilized the remains of organisms (fossilization processes take place over millions of years). Also, no unique geologic features are known to exist within the project site.

4.10.3 Environmental Impacts and Mitigation Measures

METHODOLOGY

The examination of geology and soils is based on information obtained from reviews of:

- the project description;
- available literature, including documents published by the City of Sacramento, the County of Sacramento, State and federal agencies, and published information dealing with geotechnical conditions in the Sacramento area; and
- geology data included as part of EIRs prepared for other DGS projects in downtown Sacramento, including the 10th and O Street Office Building Project and the Capitol Annex Project.

THRESHOLDS OF SIGNIFICANCE

A geology and soils impact is considered significant if implementation of the Capitol Mall Office Buildings Demolition Project would do any of the following:

- directly or indirectly expose people or structures to potential substantial adverse impacts, including the risk of loss, injury, or death through the rupture of a known earthquake fault, strong seismic shaking, seismic-related ground failure, soil liquefaction, or landslides;
- result in substantial soil erosion or the loss of topsoil;
- locate project facilities on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-site or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse;
- locate project facilities on expansive soil, creating substantial direct or indirect risks to property;
- have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater; or
- directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

ISSUES NOT DISCUSSED FURTHER

The topography of the project site in downtown Sacramento is flat. Therefore, there is little to no potential for lateral spreading and landslides. Therefore, impacts associated with lateral spreading and landslides are not discussed further in this Draft EIR.

The project site is an urban site that includes impervious surfaces and landscaping. Because project implementation would result in a similar landscape after construction is complete, and because the topography is flat, implementing the project would not generate the potential for substantial soil erosion or loss of topsoil. Nonetheless, grading, trenching, and excavation during construction can temporarily expose soil to erosive forces, such as wind and stormwater, which are addressed in Section 4.11, "Hydrology and Water Quality," of this Draft EIR.

Sewer service from the Sacramento Area Sewer District (SacSewer) is available at the project site and serves existing buildings. New development would also use the SacSewer system (see Section 4.5, "Utilities and Service Systems") There is no intention to install or use septic tanks or alternative wastewater disposal systems. Therefore, this issue is not discussed further.

As described in Section 4.10.2, "Environmental Setting," under the subheading, "Paleontology Setting," the project site lies within the urban environment of downtown Sacramento, where underlying soils consist of Holocene alluvium deposits less than 11,700 years old. Objects must typically be older than the Holocene epoch to be considered a fossil; therefore, it is highly unlikely that soils underlying the project site contain unique paleontological resources. There are no unique geological features on the project site. Therefore, these topics are not addressed further in this EIR.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 4.10-1: Seismic Hazards

The project site is not located on any known faults or traces of active faults. Surface fault rupture, therefore, is extremely unlikely. Demolition of existing buildings would not expose people or structures to substantial or increased seismic risk. Construction of future uses would be required to conform to the current CBC, which contains specifications to minimize adverse effects on structures caused by ground shaking from earthquakes and to minimize secondary seismic hazards (i.e., ground lurching, liquefaction). Through conformance with the CBC and implementation of site-specific engineering measures developed in compliance with these codes, development of this project alternative would not result in exposure of people or structures to substantial adverse effects related to seismic hazards, nor would the project have the potential to exacerbate these hazards. Therefore, this impact would be **less than significant**.

The project site is not located in an Alquist-Priolo Earthquake Fault Zone, and no mapped active or potentially active fault traces are known to traverse or project toward the site. Although the Sacramento area is located between seismically active fault regions, the project site is not located on any known faults or traces of active faults. Surface fault rupture, therefore, is extremely unlikely. In the event of a major earthquake, people and structures would be exposed to severe ground shaking. Potential secondary effects of ground shaking at the project site include seismic shaking, liquefaction, and subsidence. The potential for seismic shaking and the associated formation of cracks in the ground is considered greater at contacts between materials with substantially different properties, such as deep, soft soil and bedrock. Given the depth and relative homogeneity of alluvial deposits in the project vicinity, these conditions are highly unlikely at the project site, and the probability of ground lurching and formation of cracks in the ground during a seismic event is considered low.

Demolition

The demolition phase of the project proposes to remove three office buildings that were built in 1954, 1955, and 1988. After demolition is complete, the project site would be vacant land with no structures and no people occupying the parcels. Under these condition, people or structures would not be exposed to substantial or increased seismic risk. This impact would be less than significant.

Future Development

Following the demolition phase of the project and transfer of the property to another entity (e.g., CSU), the receiving entity would begin redevelopment of the project site. Whether the development scenario considered in this EIR (see Chapter 3, "Project Description") is implemented, or different land uses, construction of future development would conform to the most recent version of the CBC, which includes requirements for a geotechnical investigation to determine subsurface materials and geotechnical hazards that may be present at the project site and contains specifications to minimize adverse effects on structures caused by ground shaking from earthquakes. Through conformance with the CBC and implementation of site-specific engineering measures developed in compliance with these codes, development of future uses would not result in exposure of people or structures to substantial adverse effects related to seismic hazards. This impact would be less than significant.

Conclusion

The project would involve demolition of existing office buildings that, when complete, would result in vacant land that would not expose people or structures to substantial or increased seismic risk. at have identified structural deficiencies and do not meet the current CBC. Development of future uses would be required to conform to the most recent version of the CBC, which requires studies and building methods to minimize adverse effects on structures caused by ground shaking from earthquakes. Given the limited potential for seismic activity at the project site and the requirements in the CBC related to seismic resilience, project implementation would not directly or indirectly expose people or structures to potential substantial adverse impacts from seismic activity. Therefore, this impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.10-2: Liquefaction

The project site may support conditions that would allow liquefaction during a seismic event. Demolition of existing buildings would not expose people or structures to substantial or increased risk from liquefaction. Future development would conform to the applicable CBC that requires design and construction to address liquefaction hazards. This impact would be **less than significant**.

The downtown and west Sacramento areas, including the project site, are mapped within a liquefaction zone according to the California Geological Survey (2026a). Therefore, soils beneath the project site are susceptible to liquefaction, and potential liquefaction problems may exist throughout the downtown area where loose sands and silts are present below the ground water table. However, there have been no reported instances of liquefaction occurring in downtown Sacramento during past major earthquake events. Lateral spreading occurs when soils liquefy and the overlying soils move horizontally or down a slope. Because the topography at the project site is relatively flat, the potential for lateral spreading is considered low.

Demolition

The demolition phase of the proposed project would involve removal of three existing office buildings. This phase of the project would leave the project site with underground elements including foundations, piles, holes left by basements, elevator pits, and concrete slabs on the ground surface if they are not damaged during demolition. Although these elements of the existing buildings may remain, there would be no people present on the project site or structures that could collapse and cause hazards outside the project boundary were liquefaction to occur during a seismic event. Therefore, this impact would be less than significant.

Future Development

The future development would conform to the most recent CBC, which contains specifications to minimize adverse effects on structures caused by liquefaction. Chapters 16, 18, and 33 of the CBC address structural design, soils, foundations, and grading. Through conformance with the CBC and implementation of site-specific engineering measures developed in compliance with these codes, development of the project would not result in exposure of

people or structures to substantial adverse effects related to liquefaction. Through conformance with the CBC and implementation of future site-specific engineering measures developed in compliance with these codes, future development would not result in exposure of people or structures to substantial adverse effects related to liquefaction. This impact would be less than significant.

Conclusion

Due to the nature of the proposed project (i.e., removal of existing buildings) and through conformance with applicable regulations related to minimizing adverse effects on structures cause by liquefaction during future development, project implementation would have a **less than significant** impact related to liquefaction.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.10-3: Subsidence and Dynamic Compaction

The soils beneath the project site could be susceptible to subsistence and dynamic compaction. However, through conformance with the CBC and implementation of site-specific engineering measures developed in compliance with these codes, project demolition and future development would not result in exposure of people or structures to substantial adverse effects related to subsidence and dynamic compaction. This impact would be **less than significant**.

While the project site has not been mapped in an area of land subsistence due to groundwater pumping, peat loss, or oil extraction (USGS 2026), the soils beneath the project site could be susceptible to subsidence and dynamic compaction. Problems associated with subsidence and dynamic compaction may exist throughout the downtown area where unsaturated, loose granular material or uncompacted fill soils are present.

Demolition

The demolition phase of the proposed project would involve removal of three existing office buildings. This phase of the project would leave the project site with underground elements including foundations, piles, holes left by basements, elevator pits, and concrete slabs on the ground surface if they are not damaged during demolition. Although these elements of the existing buildings may remain, there would be no people present on the project site or structures that could collapse and cause hazards outside the project boundary were subsidence or dynamic compaction to occur during a seismic event. Therefore, this impact would be less than significant.

Future Development

Construction of the future development would conform to the current CBC, which contains specifications to minimize adverse effects on structures caused by subsidence and dynamic compaction. Through conformance with the CBC and implementation of site-specific engineering measures developed in compliance with these codes, development of the project would not result in exposure of people or structures to substantial adverse effects related to subsidence and dynamic compaction. This impact would be less than significant.

Conclusion

With adherence to applicable regulations, including the CBC and applicable City design standards, project demolition and future development would address potential geotechnical hazards and prevent exposure of people or structures to adverse effects related to subsistence and dynamic compaction. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.10-4: Expansive Soils

The project site and surrounding lands are currently developed as urban land with imported fill in many areas. However, where native soils are present, they are likely to be similar to those in nearby areas, with some areas having a low shrink-swell potential and others having a high shrink-swell potential (USGS 2026). Through conformance with the CBC and implementation of applicable measures to identify if shrink-well soils are present and address shrink-swell soils if they are present, development of the project would not result in exposure of people or structures to substantial adverse effects from these soil types. This impact would be **less than significant**.

The project site and surrounding lands are currently developed as urban land with imported fill in many areas. However, where native soils are present, they are likely to be similar to those in nearby areas, with some areas having a low shrink-swell potential and others having a high shrink-swell potential (USGS 2026).

Demolition

During demolition, three office buildings would be demolished and expansive soils may be encountered within the project site. However, no new facilities would be placed underground as part of the demolition phase of the project that could be adversely affected by expansive soils. Some underground facilities (e.g., utilities) may be removed. There would be no potential to create a substantial direct or indirect risks to people or property from expansive soils related to the demolition phase of the project. This impact would be less than significant.

Future Development

Construction of future development would conform to the current CBC, which contains specifications to address expansive or shrink-swell soils where they might occur. Chapter 18 (Soils and Foundations) requires a civil engineer to prepare a soil investigation if a preliminary soil report indicates the presence of critically expansive soils and recommend corrective action, including special design and construction provisions, to prevent structural damage to structures constructed on expansive soil. Through conformance with the CBC and implementation of applicable measures (if needed) to address shrink-swell soils, future development would not result in exposure of people or structures to substantial adverse effects from these soil types. This impact would be less than significant.

Conclusion

While the project site and surrounding area is currently developed as urban land with imported fill in many areas, there is the potential for expansive soils to be at the project site. During project demolition no new facilities would be placed underground, and some underground facilities may be removed, resulting in no potential to create a substantial direct or indirect risks to people or property from expansive soils. During future development, the project would be subject to the CBC that would require the project to implement site-specific design and construction provisions to identify the presence of expansive soils and prevent structural damage to structures constructed on expansive soils; therefore, this impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

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4.11 HYDROLOGY AND WATER QUALITY

This section identifies the regulatory context and policies related to hydrology and water quality, describes the existing hydrologic conditions at the project site, and evaluates potential hydrology and receiving water-quality impacts of the proposed Capitol Mall Office Buildings Demolition Project. Potential effects on the capacity of City of Sacramento water-supply, sewer/wastewater, and drainage/stormwater facilities are addressed in Section 4.5, "Utilities and Service Systems."

No comments regarding hydrology or water quality were received in response to the Notice of Preparation (see Appendix A).

4.11.1 Regulatory Setting

FEDERAL

Clean Water Act

The US Environmental Protection Agency (EPA) is the lead federal agency responsible for water quality management. The Clean Water Act (CWA) is the primary federal law that governs and authorizes water quality control activities by EPA as well as the states. Various elements of the CWA address water quality. These are discussed below.

CWA Water Quality Criteria/Standards

Pursuant to federal law, EPA has published water quality regulations under Title 40 of the Code of Federal Regulations (CFR). Section 303 of the CWA requires states to adopt water quality standards for all surface waters of the United States. As defined by the act, water quality standards consist of designated beneficial uses of the water body in question and criteria that protect the designated uses. Section 304(a) requires EPA to publish advisory water quality criteria that accurately reflect the latest scientific knowledge on the kind and extent of all effects on health and welfare that may be expected from the presence of pollutants in water. Where multiple uses exist, water quality standards must protect the most sensitive use. As described in the discussion of state regulations below, the State Water Resources Control Board (State Water Board) and its nine regional water quality control boards (RWQCBs) have designated authority in California to identify beneficial uses and adopt applicable water quality objectives.

CWA Section 303(d) Impaired Waters List

Under Section 303(d) of the CWA, states are required to develop lists of water bodies that do not attain water quality objectives after implementation of required levels of treatment by point source dischargers (municipalities and industries). Section 303(d) requires that the state develop a total maximum daily load (TMDL) for each of the listed pollutants. The TMDL is the amount of the pollutant that the water body can receive and still comply with water quality objectives. The TMDL is also a plan to reduce loading of a specific pollutant from various sources to achieve compliance with water quality objectives. In California, implementation of TMDLs is achieved through water quality control plans, known as Basin Plans, of the State RWQCBs. See "State Plans, Policies, Regulations, and Laws," below.

National Pollutant Discharge Elimination System

The National Pollutant Discharge Elimination System (NPDES) permit program was established in the CWA to regulate municipal and industrial discharges to surface waters of the United States. NPDES permit regulations have been established for broad categories of discharges including point source waste discharges and nonpoint source stormwater runoff. Each NPDES permit identifies limits on allowable concentrations and mass emissions of pollutants contained in the discharge. Sections 401 and 402 of the CWA contain general requirements regarding NPDES permits.

"Nonpoint source" pollution originates over a wide area rather than from a definable point. Nonpoint source pollution often enters receiving water in the form of surface runoff and is not conveyed by way of pipelines or discrete conveyances. Two types of nonpoint source discharges are controlled by the NPDES program: discharges

caused by general construction activities and the general quality of stormwater in municipal stormwater systems. The goal of the NPDES nonpoint source regulations is to improve the quality of stormwater discharged to receiving waters to the maximum extent practicable. The RWQCBs in California are responsible for implementing the NPDES permit system (see the discussion of "State Plans, Policies, Regulations, and Laws" section below).

National Flood Insurance Act

The Federal Emergency Management Agency (FEMA) is tasked with responding to, planning for, recovering from and mitigating against disasters. The Federal Insurance and Mitigation Administration within FEMA is responsible for administering the National Flood Insurance Program (NFIP) and administering programs that aid with mitigating future damages from natural hazards.

FEMA prepares Flood Insurance Rate Maps (FIRMs) that delineate the regulatory floodplain to assist local governments with the land use planning and floodplain management decisions needed to meet the requirements of NFIP. Floodplains are divided into flood hazard areas, which are areas designated according to their potential for flooding, as delineated on FIRMs. Special Flood Hazard Areas are the areas identified as having a one percent chance of flooding in each year (otherwise known as the 100-year flood). In general, the NFIP mandates that development is not to proceed within the regulatory 100-year floodplain, if the development is expected to increase flood elevation by 1 foot or more.

STATE

California Porter-Cologne Act

California's primary statute governing water quality and water pollution issues with respect to both surface waters and groundwater is the Porter-Cologne Water Quality Control Act of 1970 (Porter-Cologne Act). The Porter-Cologne Act grants the State Water Board and each of the nine RWQCBs power to protect water quality and is the primary vehicle for implementation of California's responsibilities under the Clean Water Act. The applicable RWQCB for the proposed project is the Central Valley RWQCB. The State Water Board and the Central Valley RWQCB have the authority and responsibility to adopt plans and policies, regulate discharges to surface and groundwater, regulate waste disposal sites, and require cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act also establishes reporting requirements for unintended discharges of any hazardous substances, sewage, or oil or petroleum products.

Under the Porter-Cologne Act, each RWQCB must formulate and adopt a water quality control plan (known as a "Basin Plan") for its region. The Basin Plan for the Central Valley Region includes a comprehensive list of waterbodies within the region and detailed language about the components of applicable Water Quality Objectives (WQOs). The Basin Plan recognizes natural water quality, existing and potential beneficial uses, and water quality problems associated with human activities throughout the Sacramento and San Joaquin River Basins. Through the Basin Plan, the Central Valley RWQCB executes its regulatory authority to enforce the implementation of TMDLs, and to ensure compliance with surface WQOs. The Basin Plan includes both narrative and numerical WQOs designed to provide protection for all designated and potential beneficial uses in all its principal streams and tributaries. Applicable beneficial uses include municipal and domestic water supply, irrigation, non-contact and contact water recreation, groundwater recharge, fresh water replenishment, hydroelectric power generation, and preservation and enhancement of wildlife, fish, and other aquatic resources.

The Central Valley RWQCB also administers the adoption of waste discharge requirements (WDRs), manages groundwater quality, and adopts projects within its boundaries under the NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (NPDES General Permit).

NPDES Construction General Permit for Stormwater Discharges Associated with Construction Activity

The State Water Board adopted the statewide NPDES General Permit in August 1999. The state requires that projects disturbing more than 1 acre of land during construction file a Notice of Intent with the RWQCB to be covered under

this permit. Construction activities subject to the General Permit include clearing, grading, stockpiling, and excavation. Dischargers are required to eliminate or reduce non stormwater discharges to storm sewer systems and other waters. A stormwater pollution prevention plan (SWPPP) must be developed and implemented for each site covered by the permit. The SWPPP must include best management practices (BMPs) designed to prevent construction pollutants from contacting stormwater and keep products of erosion from moving off-site into receiving waters throughout the construction and life of the project; the BMPs must address source control and, if necessary, pollutant control.

NPDES Stormwater Permit for Discharges from Small Municipal Separate Storm Sewer Systems

The Municipal Stormwater Permitting Program regulates stormwater discharges from municipal separate storm sewer systems (MS4s). Stormwater is runoff from precipitation that runs off surfaces such as rooftops, paved streets, highways or parking lots and can carry with it pollutants such as oil, pesticides, herbicides, sediment, trash, bacteria and metals. The runoff can then drain directly into a local stream, lake or bay. Often, the runoff drains into storm drains which eventually drain untreated into a local waterbody.

MS4 permits are issued in two phases: Phase I, for medium and large municipalities, and Phase II for small ones. Most Phase I permits are issued to a group of co-permittees encompassing an entire metropolitan area. These permits are reissued as the permits expire. The Phase I MS4 permits require the discharger to develop and implement a Stormwater Management Plan/Program with the goal of reducing the discharge of pollutants to the maximum extent practicable, which is the performance standard specified in Section 402(p) of the CWA. The management programs specify what BMPs will be used to address certain program areas.

The Capitol Mall Office Buildings Demolition project site lies within downtown Sacramento, which is covered under a Phase I permit. The City of Sacramento (City), along with the Cities of Citrus Heights, Elk Grove, Folsom, Galt, and Rancho Cordova, was reissued an NPDES areawide MS4 permit to discharge stormwater runoff from storm drains within their jurisdictions (Central Valley RWQCB Order No. R5-2015-0023, NPDES Permit No. CAS082597). Stormwater flow from the project site discharges to the City's combined sewer system (CSS) and is therefore regulated through this NPDES permit.

California Water Code

The California Water Code is enforced by the California Department of Water Resources (DWR). The mission of DWR is "to manage the water resources of California in cooperation with other agencies, to benefit the State's people, and to protect, restore, and enhance the natural and human environments." DWR is responsible for promoting California's general welfare by ensuring beneficial water use and development statewide.

Groundwater Management

Groundwater Management is outlined in the California Water Code, Division 6, Part 2.75, Chapters 1-5, Sections 10750 through 10755.4. The Groundwater Management Act was first introduced in 1992 as Assembly Bill (AB) 3030 and has since been modified by Senate Bill (SB) 1938 in 2002, AB 359 in 2011, and the Sustainable Groundwater Management Act (SB 1168, SB 1319, and AB 1739) in 2014. The intent of the Act is to encourage local agencies to work cooperatively to manage groundwater resources within their jurisdictions and to provide a methodology for developing a Groundwater Management Plan.

The Sustainable Groundwater Management Act of 2014 (SGMA) became law on January 1, 2015, and applies to all groundwater basins in the state (Water Code Section 10720.3). By enacting SGMA, the legislature intended to provide local agencies with the authority and the technical and financial assistance necessary to sustainably manage groundwater within their jurisdiction (Water Code Section 10720.1).

Pursuant to SGMA, any local agency that has water supply, water management or land use responsibilities within a groundwater basin may elect to be a "groundwater sustainability agency" for that basin (Water Code Section 10723). The Sacramento Central Groundwater Authority (SCGA) serves as a GSA pursuant to Water Code Section 10723.8 for sustainable groundwater management in the South American Subbasin of the Sacramento Valley Groundwater Basin, which underlies the project area. In coordination with regional stakeholders, the SCGA prepared and adopted the

South American Subbasin Groundwater Sustainability Plan (GSP), which was submitted to the DWR in accordance with SGMA requirements and is currently being implemented.

The South American Subbasin GSP establishes sustainability goals, monitoring programs, and management actions intended to maintain groundwater levels, protect groundwater quality, prevent significant land subsidence, and ensure long-term groundwater reliability. Regional groundwater management efforts also include conjunctive use and groundwater banking programs that help improve water supply reliability and support groundwater sustainability objectives within the subbasin.

Central Valley Flood Protection Act

The Central Valley Flood Protection Act of 2008 establishes the 200-year flood event as the minimum level of protection for urban and urbanizing areas. As part of the state's FloodSAFE program, those urban and urbanizing areas protected by flood control project levees must receive protection from the 200-year flood event level by 2025. The DWR and Central Valley Flood Protection Board collaborated with local governments and planning agencies to prepare the 2012 Central Valley Flood Protection Plan, which takes a systemwide approach to flood management and protection improvements for the Central and San Joaquin Valleys. The Plan is updated every 5 years and was most recently updated in 2022.

Section 9110(f) of the California Water Code defines the SPFC as follows, "'State Plan of Flood Control' means the state and federal flood control works, lands, programs, plans, policies, conditions, and mode of maintenance and operations of the Sacramento River Flood Control Project described in Section 8350, and of flood control projects in the Sacramento River and San Joaquin River watersheds authorized pursuant to Article 2 (commencing with Section 12648) of Chapter 2 of Part 6 of Division 6 for which the board or the department has provided the assurances of nonfederal cooperation to the United States, and those facilities identified in Section 8361."

The SPFC encompasses a wide network of facilities, which range from major structures such as levees, drainage pumping plants, drop structures, dams and reservoirs, and major channel improvements, to minor components such as stream gauges, pipes, and bridges.

LOCAL

The buildings on the project site are located on State-owned property and would be demolished by the California Department of General Services (DGS) and subsequent development is presumed to be undertaken by the California State University, Sacramento (Sacramento State), another State agency. As explained in Section 4.2, "Land Use and Planning," of this Draft EIR, under Section 4.2.1, "Local," state agencies are not subject to local plans, policies, and zoning regulations. However, this does not apply to instances where local agencies are administering or enforcing State or federal laws. Regarding local plans, policies, and zoning regulations, in the exercise of its discretion, DGS does reference, describe, and address local plans, policies, and regulations that may be applicable to the project. This evaluation is also intended to be used by local agencies for determining, as part of their permit processes, the project's consistency with local plans, policies, and regulations.

City of Sacramento 2040 General Plan

The following policies from the Sacramento 2040 General Plan Utilities Element relate to stormwater and wastewater management and may be applicable to the project:

- **Policy U 4.1.1: Adequate Drainage Facilities.** The City shall ensure that all new drainage facilities are adequately sized and constructed to accommodate stormwater runoff in urbanized areas.
- **Policy U 4.1.5: Green Stormwater Infrastructure.** The City shall encourage "green infrastructure" design and Low Impact Development (LID) techniques for stormwater facilities (i.e., using vegetation and soil to manage stormwater) to achieve multiple benefits (e.g., preserving and creating open space, improving runoff water quality).

- **Policy U 4.1.6: New Development.** The City shall require proponents of new development to submit drainage studies that adhere to City stormwater design requirements and incorporate measures, including "green infrastructure" and Low Impact Development (LID) techniques, to prevent on- or off-site flooding.
- **Policy ER 1.1.3: Stormwater Quality.** The City shall control sources of pollutants and improve and maintain urban runoff water quality through storm water protection measures consistent with the City's NPDES Permit.
- **Policy ER 1.1.4: New Development.** The City shall require new development to protect the quality of water bodies and natural drainage systems through site design, source controls, storm water treatment, runoff reduction measures, best management practices (BMPs) and Low Impact Development (LID), and hydromodification strategies consistent with the City's NPDES Permit.
- **Policy ER 1.1.5: Limit Stormwater Peak Flows.** The City shall require all new development to contribute no net increase in stormwater runoff peak flows over existing conditions associated with a 100-year storm event.
- **Policy ER 1.1.6: Post-Development Runoff.** The City shall impose requirements to control the volume, frequency, duration, and peak flow rates and velocities of runoff from development projects to prevent or reduce downstream erosion and protect stream habitat.
- **Policy ER 1.1.7: Construction Site Impacts.** The City shall minimize disturbances of natural water bodies and natural drainage systems caused by development, implement measures to protect areas from erosion and sediment loss, and continue to require construction contractors to comply with the City's erosion and sediment control ordinance and stormwater management and discharge control ordinance.
- **Policy EC 2.1.8: Floodplain Requirements.** The City shall regulate development within floodplains in accordance with State and Federal requirements and maintain the City's eligibility under the National Flood Insurance Program.
- **Policy EC 2.1.11: New Development.** The City shall require evaluation of potential flood hazards prior to approval of development projects.

Stormwater Quality Design and Procedures Manual

As detailed above, the County of Sacramento and the Cities of Sacramento, Folsom, and Galt received one of the first areawide NPDES MS4 permits in 1990. In response, the Sacramento Stormwater Quality Partnership developed core stormwater management program elements and activities to address problems related to water quality of local urban runoff. The program is discussed in detail in the City of Sacramento's Stormwater Quality Improvement Plan. The program is an established effort that effectively reduces pollutants to the maximum extent practicable by continuing to implement successful control measures and to develop and utilize new, innovative BMPs.

While the BMPs described in the program are to be followed throughout the city, stormwater flow from the project site discharges to the City's combined sewer system (CSS) and is therefore regulated through the NPDES permit (NPDES No. CA 0077682), described in Section 4.5 "Utilities and Service Systems."

Sacramento Central Groundwater Authority

The Sacramento Central Groundwater Authority developed the Central Sacramento County Groundwater Management Plan (CSCGMP) to assist water providers in maintaining a safe, sustainable, and high quality groundwater resource within the extent of the groundwater basin (SCWA 2006). There are five Best Management Objectives outlined in the CSCGMP that are used to achieve that central goal. They are to:

1. maintain a long-term average groundwater extraction rate of 273,000 acre-feet/year,
2. establish specific minimum groundwater elevations within all areas of the basin consistent with the Water Forum "Solution,"
3. protect against any potential inelastic land surface subsidence,
4. protect against any adverse impacts to surface water flows, and
5. develop specific water quality objectives for several constituents of concern.

Sacramento Area Flood Control Agency

The Sacramento Area Flood Control Agency (SAFCA) was formed in 1989 to address the Sacramento area's vulnerability to catastrophic flooding. Its mission is to minimize flood risk potential while preserving the environment, and enhancing floodway and floodplains. This vulnerability was exposed during the record flood of 1986 when Folsom Dam exceeded its normal flood control storage capacity and several area levees nearly collapsed under the strain of the storm. In response, the City of Sacramento, the County of Sacramento, the County of Sutter, the American River Flood Control District and Reclamation District No. 1000 created SAFCA through a Joint Exercise of Powers Agreement to provide the Sacramento region with increased flood protection along the American and Sacramento Rivers.

City of Sacramento Comprehensive Flood Management Plan

Because of the City's high flood risk and vulnerability, the City developed a comprehensive flood management plan (CFMP) to guide the City's flood risk reduction and mitigation efforts. The CFMP was initiated by the City's Department of Utilities and serves as the City's strategic plan to reduce flood risk over the planning period (2016- 2021).

4.11.2 Environmental Setting

HYDROLOGY AND DRAINAGE

Regional Hydrology

The primary watershed within Sacramento County is the Sacramento River Basin, which encompasses 26,500 square miles and is bound by the Sierra Nevada to the east, the Coast Ranges to the west, the Cascade Range and Trinity Mountains to the north, and the Sacramento-San Joaquin Delta lands (Delta) to the south. The Sacramento River Basin is the largest river basin in California, capturing roughly one-third of the total surface runoff in the state, and draining an average of approximately 21.9 million acre-feet per year (USGS 2000). Rain and snow support late autumn, winter, and spring flows, and melting of the winter snowpack is the primary source of flows during the summer and early fall months. Within the Sacramento River Basin there are several subbasins or smaller watersheds that drain to the tributaries of the Sacramento River (Figure 4.11-1).

The Sacramento River originates in the mountains and plateaus of far northern California and flows south through the Sacramento Valley. As the river approaches downtown Sacramento, it is joined by the American River from the east and then flows under Tower Bridge and I-80 in downtown Sacramento. Upstream from downtown Sacramento, the Sacramento Weir is situated to relieve floodwaters from the Sacramento River, sending them south via the Yolo Bypass, to enter the Delta near Rio Vista. The region of the Sacramento River below the I Street Bridge is considered part of the Delta (California Water Code Section 1220). Forty miles south of the Sacramento area, the Sacramento River joins the San Joaquin River, and waters from both rivers drain into San Francisco Bay.

The project area is underlain by the South American Subbasin of the Sacramento Valley Groundwater Basin. Groundwater resources within the subbasin provide an important component of the region's water supply and are managed in conjunction with surface water resources through extensive conjunctive use, groundwater recharge, and groundwater banking programs. During wetter periods, excess surface water supplies may be recharged into local aquifers and stored for future use during dry years, helping to improve water supply reliability and reduce long-term groundwater level declines. These groundwater management practices, together with implementation of the South American Subbasin GSP, have contributed to stabilization of groundwater conditions and support the region's long-term groundwater sustainability objectives.



Source: Adapted by Ascent in 2026.

Figure 4.11-1 Sacramento River Basin Watershed

Local Hydrology

The project site is in the City of Sacramento on low-lying lands approximately 0.5-mile east of the Sacramento River and approximately 1.5 miles south of the American River. The site is downstream (south) of the of the confluence of the Sacramento and American Rivers. The project site is in an urbanized area and has no direct connection to streams, creeks, or other hydrologic features.

Stormwater Drainage

At a broad scale, storm drainage is comprised of overland sheet flow generated diffusely throughout a watershed by precipitation and channeled, ultimately, to natural drainageways. In local urban neighborhoods and communities in Sacramento County, drainage is primarily conveyed by engineered drainage systems consisting of pipes, gutters, swales, ditches, and graded land. These engineered systems are designed to control the quantity and quality of storm drainage produced in urban areas, and manage it in a controlled manner such that it produces less harm to natural waterbodies.

Stormwater at the project site is collected by the CSS and conveyed to one of two facilities for primary treatment prior to discharge to the Sacramento River. CSS flows and discharges are currently regulated by the provisions of WDR Order No. R5-2015-0045 (NPDES No. CA0079111). Direct stormwater discharges to the Sacramento River are not permitted unless the total combined 380 mgd capacity of the CSS is exceeded during an extreme high flow event. Section 4.5, "Utilities and Service Systems," contains further details relating to the operation and capacity of the CSS.

Flood Conditions

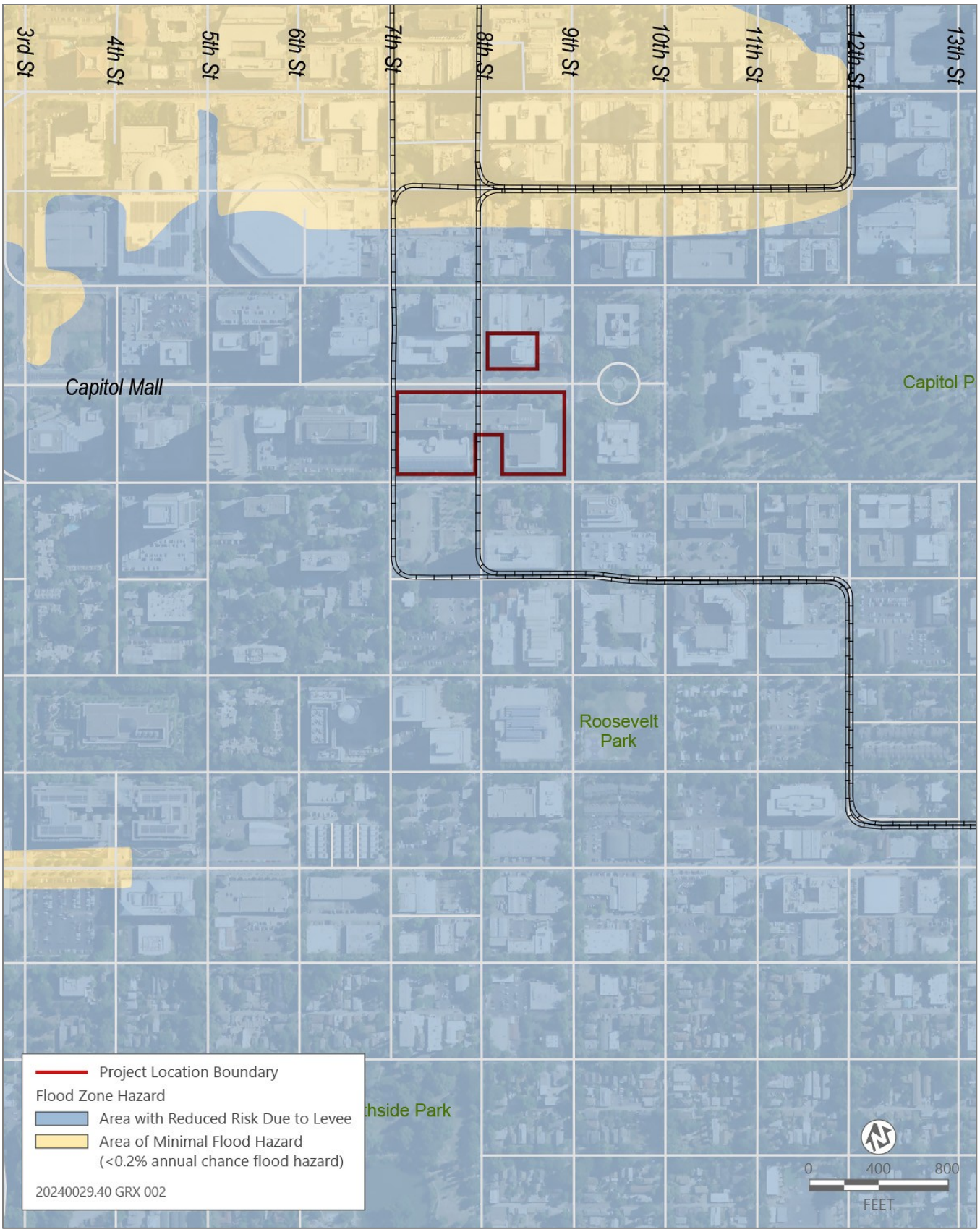
Sacramento County has an extensive system of dams, levees, weirs, pumping plants, and flood control bypass channels along the Sacramento and American Rivers to provide flood control. These facilities can control floodwaters by regulating the amount of water passing through reaches of the river. The amount of water flowing through the river system can be controlled locally by Folsom Dam on the American River and the reserve overflow area of the Yolo Bypass on the Sacramento River.

Downtown Sacramento is located as Zone X within the natural floodplain of the Sacramento River, with a one percent risk of flooding in any given year (100-year floodplain) (FEMA 2024). However, the flood risk is reduced in downtown Sacramento, including the project site (Figure 4.11-2), by the system of levees maintained under the SPFC.

Groundwater Hydrology

The project site is located within the South American Groundwater Subbasin of the Sacramento Valley Groundwater Basin, as defined in the DWR Bulletin 118 (DWR 2025). The South American Subbasin is bounded by the Sierra Nevada on the east, the Sacramento River on the west, the American River to the north, and the Cosumnes and Mokelumne rivers on the south.

Sacramento is underlain by geologic formations that include an upper, unconfined aquifer system (able to receive water that infiltrates from the surface) and a lower semiconfined aquifer system (infiltration of water can be partially blocked by impermeable layers). Depth to groundwater in the downtown area varies seasonally, is relatively shallow (less than 10 feet to the water table), with no predominant direction of groundwater flow (SCGA 2012).



Source: Adapted by Ascent in 2026.

Figure 4.11-2 Flood Zones

WATER QUALITY

Surface Water Quality

The most extensive water-quality monitoring programs and data sets of the Sacramento River near Sacramento include the Coordinated Monitoring Program (CMP) conducted by the City and County, the Sacramento River Watershed Program, and the US Geological Survey (USGS) National Water Quality Assessment Program for the Sacramento River Basin.

Designated beneficial uses for the Sacramento River near the project site, include:

- municipal and agricultural supply,
- contact and noncontact recreation,
- coldwater fish habitat and spawning,
- warmwater fish habitat and spawning,
- wildlife habitat, and
- navigation.

The Sacramento River, from Knights Landing to the Delta, is included on the CWA Section 303(d) list of impaired waters for chlordane, dichlorodiphenyltrichloroethane (DDT), dieldrin, mercury, polychlorinated biphenyls (PCBs), temperature, and toxicity (toxicity to various biological indicators exhibited through standardized toxicity tests), based on assessments presented in the 2023–2024 California Integrated Report (Central Valley RWQCB 2024). Chlordane, DDT, and dieldrin are legacy insecticides historically used in agricultural and urban settings; PCBs are industrial compounds formerly used in a variety of electrical and manufacturing applications; mercury is associated largely with historic gold mining activities in the Sierra Nevada; and elevated water temperatures can adversely affect aquatic habitat and sensitive fish species.

Measurements taken at the USGS Freeport monitoring station on the Sacramento River by CMP and USGS indicate that for many generic water quality parameters, the Sacramento River generally has good water quality that is low in common pollutants that are used as indicators of overall river health. The data indicate that the river is low in total dissolved solids (TDS), has neutral pH, moderate alkalinity, and adequate dissolved-oxygen levels for aquatic organisms. The water from the river is also generally low in nutrients (nitrogen and phosphorus) that can cause nuisance algae and aquatic vascular plant growth. Total organic carbon concentrations often exceed Safe Drinking Water Act thresholds that can potentially trigger additional treatment requirements at municipal treatment plants. The river concentrations of E. coli and fecal coliform concentrations are typically low in dry-weather conditions and elevated in the winter runoff period, resulting in general conformance to long-term mean Basin Plan objectives. Trace metal content is generally low in the river, except for mercury, which is a legacy pollutant from historic mining operations.

While pesticides have been detected and resulted in Section 303(d) listing of the Sacramento River for such constituents, there are no applicable regulatory criteria established for pesticides that have been exceeded (Central Valley RWQCB 2024). The Section 303(d) listing and Total Daily Maximum Load process is used to identify impaired water bodies, establish pollutant reduction targets where necessary, and guide implementation actions intended to restore and maintain beneficial uses of the Sacramento River watershed (Central Valley RWQCB 2024).

Groundwater Quality

Groundwater quality can be affected by many things, but the chief controls on the characteristics of groundwater quality are the source and chemical composition of recharge water, properties of the host sediment, and history of discharge or leakage of pollutants. Groundwater quality impairments in the central Sacramento area are primarily related to urban source contamination.

The Sacramento region contains known areas of substantial groundwater pollution, including groundwater plumes beneath the former McClellan Air Force Base, the former Mather Air Force Base, and the Aerojet property south of US 50 in Rancho Cordova. A portion of the South Plume, a significant industrial groundwater plume emanating from the

Railyards and contaminated with metals, solvents, and petroleum-based compounds, is located just northwest of the project site (City of Sacramento 2024).

4.11.3 Environmental Impacts and Mitigation Measures

METHODOLOGY

Evaluation of potential hydrologic and water quality impacts is based on a review of existing documents and studies that address water resources in the vicinity of the project. Information obtained from these sources was reviewed and summarized to describe existing conditions and to identify potential environmental effects, based on the standards of significance presented in this section. In determining the level of significance, the analysis assumes that the project would comply with relevant federal, state, and local laws, ordinances, and regulations.

THRESHOLDS OF SIGNIFICANCE

A hydrology and water quality impact is considered significant if implementation of the Capitol Mall Office Buildings Demolition Project would do any of the following:

- violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality;
- substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;
- substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would
  - result in substantial erosion or siltation on- or off-site;
  - result in flooding on-site or off-site;
  - create or contribute runoff water that would exceed the capacity of existing or planned stormwater- drainage systems or provide substantial additional sources of polluted runoff;
  - impede or redirect flood flows
- in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; or
- conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

ISSUES NOT DISCUSSED FURTHER

The project's contribution of stormwater and wastewater to the City's CSS and the project's impact on the capacity and infrastructure of the CSS are addressed in Section 4.5, "Utilities and Service Systems." The project would secure its water supply from the City of Sacramento and would not pump groundwater or result in coverage of areas used for groundwater recharge. There would be no potential to contribute to groundwater depletion or interfere substantially with groundwater recharge.

Although downtown Sacramento is within the natural floodplain of the Sacramento River, it is located within Zone X with a 1-percent risk of flooding in any given year (100-year floodplain), therefore the FEMA FIRM indicates that the flood risk is reduced in downtown Sacramento, including the project site, due to levees and the overall flood protection system (Figure 4.11-2). The project would not place structures, including housing, in a flood hazard area. Therefore, the project would have no impact related to flood hazards and this issue is not evaluated further.

The city is not within an area subject to seiche or tsunami; therefore, these issues are not evaluated further.

As described in the discussion of Impact 4.11-1, below, implementation of the project would include compliance with existing regulations relating to stormwater controls, including SWPPP BMPs and design standards set forth in the City's Stormwater Quality Design Manual for the Sacramento Region. Compliance with these standards and regulations would ensure that the project would neither conflict with nor obstruct any applicable water quality control plan, including the Water Quality Control Plan for the Central Valley RWQCB and the Central Sacramento County Groundwater Management Plan (Central Valley RWQCB 2018; SCWA 2006). The project's potential to affect groundwater supply is addressed in Section 4.5, "Utilities and Service Systems," and standard protective measures related to encountering groundwater contamination are addressed in Section 4.12, "Hazards and Hazardous Materials."

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 4.11-1: Construction-Related Water Quality Impacts

Project demolition and future redevelopment would involve ground-disturbing activities, which could lead to erosion and sedimentation, and possible exposure of the groundwater table. Stormwater runoff and groundwater contact with construction materials could lead to degradation of water quality. Compliance with existing regulations relating to stormwater controls, including adherence to SWPPP BMPs and implementation of relevant design standards in the Stormwater Quality Design Manual for the Sacramento Region or the equivalent would result in a **less-than-significant** water quality impact.

The project site is in a developed downtown area with no direct connection to streams or other natural drainage features. Stormwater from the site is collected by the City's combined sewer system (CSS) and conveyed for treatment prior to discharge to the Sacramento River, except during extreme wet-weather events when system capacity may be exceeded. The Sacramento River is listed as impaired for legacy pesticides, mercury, PCBs, temperature, and toxicity; however, monitoring at the USGS Freeport station indicates that general water quality is good, with low total dissolved solids, neutral pH, adequate dissolved oxygen, generally low nutrient concentrations, and bacteria levels are typically low during dry weather and higher during winter runoff (Central Valley RWQCB 2024). Groundwater in the downtown area is shallow, and regional groundwater quality concerns are primarily associated with urban and industrial contamination. There is no known groundwater contamination at the project site, and standard protective measures would be implemented if groundwater is encountered during demolition and future development.

Demolition

Implementation of the project would include demolition of the three existing buildings. The concrete slabs would be left in place, with no excavation of footings or other subsurface disturbance. There may be some isolated utility capping for safety purposes, and this activity would include only minor ground disturbance in areas that had been previously excavated during the initial utility placement.

Demolition activities would include building abatement, structure demolition, utility disconnection, and material handling at each of the three sites and hauling offsite for disposal. Demolition activity and ground disturbance would be largely contained within the project site. If exposed to precipitation, disturbed soils and demolition materials could result in erosion, sediment transport, and discharge of pollutants into the CSS and groundwater; there are no natural surface water bodies in the area. Demolition activities could also involve the use of hazardous materials that could adversely affect water quality if accidentally released. Impacts related to hazardous materials is further discussed in Section 4.12, "Hazards and Hazardous Materials."

Prior to demolition, DGS would obtain coverage under, and comply with, the NPDES General Permit. In compliance with the General Permit, a SWPPP would be prepared detailing measures to control soil erosion and waste discharges from project construction areas. All contractors conducting demolition-related work would be required to implement the SWPPP to control soil erosion and waste discharges. The general contractor(s) and subcontractor(s) conducting the work would be responsible for implementing all BMPs detailed in the SWPPP.

The SWPPP would identify the grading and erosion-control BMPs and specifications necessary to avoid and minimize water quality impacts to the extent practicable. Standard erosion control measures (including management and structural controls) would be required for all demolition activities that expose soil. The SWPPP would contain specific measures for stabilizing soil before the onset of the winter rainfall season. Implementation of these standard erosion-control measures would reduce the potential for soil erosion and sedimentation of stormwater runoff from demolition.

If dewatering is required, the SWPPP would include a dewatering plan, which would establish measures to treat groundwater pumped from the site before release, and to prevent/minimize sediment and contaminant releases into groundwater during excavation, as well as methods to clean up releases if they occur. Measures to prevent/minimize releases of sediment and contaminants into groundwater during excavation and methods of cleaning up releases may include using temporary berms or dikes to isolate construction activities; using vacuum trucks to capture contaminant releases; and maintaining absorbent pads and other containment and cleanup materials on-site to allow an immediate response to contaminant releases if they occur.

Implementation of these measures would minimize the potential for demolition-related degradation of surface water or groundwater quality.

Future Development

Upon completion of the building demolition, the site is intended to be ready for construction of future uses for a Downtown Sacramento Campus of Sacramento State. The EIR evaluates this redevelopment scenario at a programmatic level because specific site plans, grading plans, utility plans, and building designs have not yet been prepared. As described in Chapter 3, "Project Description," potential future land uses of the project site include academic, residential, hospitality, commercial, entertainment, parking, and related uses with a total development program anticipated to comprise approximately 3,630,000 gross square feet at full buildout. Development of the site would involve ground-disturbing activities over multiple phases for construction of building foundations, utility connections, and other site improvements.

In addition to the protections provided by coverage under the General Permit, projects in the city are typically subject to the City's Land Grading and Erosion Control Ordinance, which requires preparation and implementation of erosion, sediment, and pollution-control plans for construction and post-construction periods, and the City's Stormwater Management and Discharge Control Ordinance, which requires projects to minimize or eliminate sediment and pollutants in construction site stormwater discharges. While the State, including CSU, is not subject to local regulations, CSU would, in the exercise of its discretion, prepare an erosion, sediment, and pollution-control plan, or its equivalent, for construction and post-construction activities and would comply with all applicable regulations and industry-standard practices for protection of surface water and groundwater quality. Because Sacramento State and CSU would comply with applicable regulations and protective standards, impacts to surface and groundwater quality resulting from future development construction would be less than significant.

As for the demolition phase, a SWPPP would be prepared for any future development on the project site. The SWPPP would identify appropriate BMPs, specifications to avoid and minimize water quality impacts, and erosion control measures for construction activities that expose soil. Any fill or other imported materials would be clean, chemically inert, and handled with appropriate containment to prevent contamination of stormwater. Grading operations would be required to eliminate direct routes for conveying potentially contaminated runoff to the CSS. Erosion control barriers such as silt fences and mulching material would be installed. The SWPPP would contain specific measures for stabilizing soils before the onset of the winter rainfall season. Implementation of these standard erosion-control measures would reduce the potential for soil erosion and sedimentation of stormwater runoff during construction.

In addition, Sacramento State and CSU or any future developer would prepare an erosion, sediment, and pollution-control plan, or its equivalent, for construction and post-construction activities, and would comply with all applicable regulations and BMPs for protection of surface water and groundwater quality.

Conclusion

Demolition of the existing buildings and reasonably foreseeable future redevelopment could result in temporary water quality impacts associated with ground disturbance, material handling, and construction activities. However,

Because DGS and CSU/Sacramento State would comply with the above-described laws and regulations designed to be protective of water quality, the release of soil or other contaminant materials into water bodies during demolition and construction would be avoided and/or minimized. Impacts on surface water and groundwater quality resulting from project construction would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.11-2: Substantially Alter the Existing Drainage Pattern of the Site or Area, Resulting in Substantial Erosion, Siltation, Flooding, or Additional Sources of Polluted Runoff

Implementation of the Capitol Mall Office Buildings Demolition Project would not substantially alter the existing drainage pattern of the site or area in a manner that would result in substantial erosion, siltation, flooding, exceedance of storm drain system capacity, or additional sources of polluted runoff. Given that the project would not substantially change the amount of impervious surfaces on the site, and that a grading plan and drainage plan would be implemented as part of any future development of the site, any changes to the site drainage pattern would not result in new sources of erosion, siltation, flooding, or polluted runoff. This impact would be **less than significant**.

The volume and rate of stormwater runoff generated from an area is affected by development through conversion of vegetated or pervious surfaces to impervious surfaces and by the development of drainage systems that connect these impervious surfaces to streams or other water bodies. In this way, development can increase the rate of runoff and eliminate storage, detention, and infiltration that would naturally occur along drainage paths. As water runs off the land surface, it collects and carries materials and sediment, which can be potentially harmful to downstream receiving waters. Additionally, runoff from impervious surfaces can become concentrated, overwhelming existing storm drain systems, causing erosion and increasing sediment transport, downstream deposition, and flooding in lower watershed areas.

Natural areas within the site are sparse, consisting primarily of ornamental landscaping. Runoff that is not absorbed by unpaved areas is collected by a series of connected, catch basins and drainage inlets that convey runoff to the CSS system serving the existing buildings. Demolition of the buildings would occur on and adjacent to portions of the site that are both pervious (e.g., landscaped) and impervious (i.e., within building footprints, paved walkways). While existing stormwater/drainage features on the site and connections to the CSS would be maintained, any necessary upgrades would be installed as needed per code and project requirements.

Demolition

The project would involve demolition of the three existing state-owned buildings. Existing site drainage is provided through a combination of roof drains, paved surfaces, inlets, and connections to the City of Sacramento's storm drainage and CSS infrastructure. Demolition activities would not substantially alter existing drainage patterns. The existing buildings and associated paved surfaces would be removed, but foundations, piles, and related underground structural elements would generally remain in place. Existing underground utility connections would be cut and capped, and any modifications to drainage infrastructure necessary to support demolition activities would be conducted in coordination with applicable agencies and utility providers. Temporary erosion and sediment control measures required through the SWPPP and any applicable policies from the City of Sacramento 2040 General Plan relative to its drainage and stormwater control facilities would ensure that runoff generated during demolition activities does not result in substantial erosion, sedimentation, flooding, or additional sources polluted runoff.

Following demolition, portions of the project site may remain vacant pending future redevelopment. Temporary site conditions would be stabilized through implementation of SWPPP measures and other applicable BMPs to prevent erosion and sediment transport.

Future Development

Upon completion of demolition, the site is intended to be ready for construction of future uses for a downtown campus of Sacramento State. Once construction is complete, the areas developed would be restored with little change in or only a small increase in overall impervious surface.

Future redevelopment would require preparation of grading, drainage, and utility plans, and construction would comply with applicable NPDES permit requirements and incorporate stormwater management features designed to collect, convey, and manage runoff generated by the new development. Although the State is not required to adhere to local plans and policies, CSU and Sacramento State would develop the project in a manner that is generally consistent with City ordinances regulating site drainage and stormwater control, including the City's Stormwater Management and Discharge Control Ordinance.

Because future redevelopment would be required to incorporate appropriately designed drainage facilities and stormwater management measures, redevelopment of the site would not substantially alter drainage patterns in a manner that would result in erosion, siltation, flooding, exceedance of storm drainage system capacity, or additional sources of polluted runoff.

Conclusion

Given these factors, building demolition and future redevelopment would not substantially alter the drainage pattern of the project site or result in substantial erosion, siltation, flooding, exceedance of stormwater drainage systems, or additional sources of polluted runoff. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

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4.12 HAZARDS AND HAZARDOUS MATERIALS

This section describes the potential impacts of the Capitol Mall Office Buildings Demolition Project related to hazardous materials and public health. The evaluation provided in this section is based, in part, on review of the Facility Condition Assessments prepared for the State Personnel Board Building (EMG 2015a) and the Employment Development Department Headquarters (EMG 2015b).

One comment letter regarding hazards and hazardous materials was received in response to the Notice of Preparation (see Appendix A). The California Geologic Energy Management Division provided comments that addressed the topics of conducting asbestos surveys and abatement prior to building demolition and avoiding development on, or near, abandoned oil, gas, or geothermal wells. However, no abandoned oil, gas, or geothermal wells were identified on or near the project site and the comment brought up the issue as a generalized caution rather than specific guidance for the proposed project.

4.12.1 Regulatory Setting

FEDERAL

Management of Hazardous Materials

Various federal laws address the proper handling, use, storage, and disposal of hazardous materials, as well as requiring measures to prevent or mitigate injury to health or the environment if such materials are accidentally released. The US Environmental Protection Agency (EPA) is the agency primarily responsible for enforcement and implementation of federal laws and regulations pertaining to hazardous materials. Applicable federal regulations pertaining to hazardous materials are primarily contained in Code of Federal Regulations (CFR) Titles 29, 40, and 49. Hazardous materials, as defined in the Code, are listed in 49 CFR 172.101. Management of hazardous materials is governed by the following laws.

- The Toxic Substances Control Act of 1976 (15 US Code [USC] Section 2601 et seq.) regulates the manufacturing, inventory, and disposition of industrial chemicals, including hazardous materials. Section 403 of the Toxic Substances Control Act establishes standards for lead-based paint hazards in paint, dust, and soil.
- The Resource Conservation and Recovery Act of 1976 (42 USC 6901 et seq.) is the law under which EPA regulates hazardous waste from the time the waste is generated until its final disposal ("cradle to grave").
- The Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (also called the Superfund Act or CERCLA) (42 USC 9601 et seq.) gives EPA authority to seek out parties responsible for releases of hazardous substances and ensure their cooperation in site remediation.
- The Superfund Amendments and Reauthorization Act of 1986 (Public Law 99-499; USC Title 42, Chapter 116), also known as SARA Title III or the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA), imposes hazardous materials planning requirements to help protect local communities in the event of accidental release.
- The Spill Prevention, Control, and Countermeasure (SPCC) rule includes requirements for oil spill prevention, preparedness, and response to prevent oil discharges to navigable waters and adjoining shorelines. The rule requires specific facilities to prepare, amend, and implement SPCC Plans. The SPCC rule is part of the Oil Pollution Prevention regulation, which also includes the Facility Response Plan rule.

Transport of Hazardous Materials

The US Department of Transportation regulates transport of hazardous materials between states and is responsible for protecting the public from dangers associated with such transport. The federal hazardous materials transportation law, 49 USC 5101 et seq. (formerly the Hazardous Materials Transportation Act 49 USC 1801 et seq.) is the basic statute regulating transport of hazardous materials in the United States. Hazardous materials transport

regulations are enforced by the Federal Highway Administration, the US Coast Guard, the Federal Railroad Administration, and the Federal Aviation Administration.

Worker Safety

The federal Occupational Safety and Health Administration (OSHA) is the agency responsible for assuring worker safety in the handling and use of chemicals identified in the Occupational Safety and Health Act of 1970 (Public Law 91-596, 29 USC 651 et seq.). OSHA has adopted numerous regulations pertaining to worker safety, contained in CFR Title 29. These regulations set standards for safe workplaces and work practices, including standards relating to the handling of hazardous materials and those required for excavation and trenching.

STATE

Management of Hazardous Materials

In California, both federal and state community right-to-know laws are coordinated through the Governor's Office of Emergency Services. The federal law, SARA Title III or EPCRA, described above, encourages and supports emergency planning efforts at the state and local levels and provides local governments and the public with information about potential chemical hazards in their communities. Because of the community right-to-know laws, information is collected from facilities that handle (e.g., produce, use, store) hazardous materials above certain quantities. The provisions of EPCRA apply to four major categories:

- emergency planning,
- emergency release notification,
- reporting of hazardous chemical storage, and
- inventory of toxic chemical releases.

The corresponding state law is Chapter 6.95 of the California Health and Safety Code (Hazardous Materials Release Response Plans and Inventory). Under this law, qualifying businesses are required to prepare a Hazardous Materials Business Plan, which would include hazardous materials and hazardous waste management procedures and emergency response procedures, including emergency spill cleanup supplies and equipment. At such time as the applicant begins to use hazardous materials at levels that reach applicable state and/or federal thresholds, the plan is submitted to the administering agency.

The California Department of Toxic Substances Control (DTSC), a division of the California Environmental Protection Agency, has primary regulatory responsibility over hazardous materials in California, working in conjunction with EPA to enforce and implement hazardous materials laws and regulations. As required by Section 65962.5 of the California Government Code, DTSC maintains a hazardous waste and substances site list for the State, known as the Cortese List. Individual regional water quality control boards (RWQCBs) are the lead agencies responsible for identifying, monitoring, and cleaning up leaking underground storage tanks (USTs). The Central Valley RWQCB has jurisdiction over the Capitol Mall Office Buildings Demolition Project site.

Transport of Hazardous Materials and Hazardous Materials Emergency Response Plan

The State of California has adopted U.S. Department of Transportation regulations for the movement of hazardous materials originating within the state and passing through the state; state regulations are contained in 26 California Code of Regulations (CCR). State agencies with primary responsibility for enforcing state regulations and responding to hazardous materials transportation emergencies are the California Highway Patrol and the California Department of Transportation. Together, these agencies determine container types used and license hazardous waste haulers to transport hazardous waste on public roads.

California has developed an emergency response plan to coordinate emergency services provided by federal, state, and local governments and private agencies. Response to hazardous materials incidents is one part of the

plan. The plan is managed by the Governor's Office of Emergency Services, which coordinates the responses of other agencies in the project area.

Management of Construction Activities

Through the Porter-Cologne Water Quality Act and the National Pollution Discharge Elimination System (NPDES) program, RWQCBs have the authority to require proper management of hazardous materials during project construction. For a detailed description of the Porter-Cologne Water Quality Act, the NPDES program, and the role of the Central Valley RWQCB, see Section 4.11, "Hydrology and Water Quality."

The State Water Resources Control Board (SWRCB) adopted the statewide NPDES General Permit for construction stormwater in September 2022. The state requires that projects disturbing more than one acre of land during construction file a Notice of Intent with the RWQCB to be covered under this permit. Construction activities subject to the General Permit include clearing, grading, stockpiling, and excavation. Dischargers are required to eliminate or reduce non-stormwater discharges to storm sewer systems and other waters. A stormwater pollution prevention plan (SWPPP) must be developed and implemented for each site covered by the permit. The SWPPP must include best management plans (BMPs) designed to prevent construction pollutants from contacting stormwater and keep products of erosion from moving off-site into receiving waters throughout the construction and life of the project; the BMPs must address source control and, if necessary, pollutant control.

Worker Safety

The California Occupational Safety and Health Administration (Cal/OSHA) assumes primary responsibility for developing and enforcing workplace safety regulations within the state. Cal/OSHA standards are typically more stringent than federal OSHA regulations and are presented in Title 8 of the CCR. Cal/OSHA conducts onsite evaluations and issues notices of violation to enforce necessary improvements to health and safety practices.

Title 8 of the CCR also includes regulations that provide for worker safety when blasting and explosives are utilized during construction activities. These regulations identify licensing, safety, storage, and transportation requirements related to the use of explosives in construction.

LOCAL

The buildings on the project site are located on State-owned property and would be demolished by the Department of General Services (DGS) and subsequent development is presumed to be undertaken by the California State University, Sacramento (Sacramento State), another State agency. As explained in Section 4.2, "Land Use and Planning," of this Draft EIR, in Section 4.2.1, "Regulatory Setting," the state is exempt from complying with local plans, policies, or zoning regulations. However, this does not apply to instances where local agencies are administering or enforcing State or federal laws. Nevertheless, in the exercise of its discretion, DGS references, describes, and addresses local plans, policies, and regulations in its evaluation of the project. This evaluation is also intended to be used by local agencies for determining, as part of their permit processes, the project's consistency with local plans, policies, and regulations.

County of Sacramento

The County of Sacramento enforces State regulations governing hazardous substance generators; hazardous substance storage; and the inspection, enforcement, and removals of USTs in both the city of Sacramento and Sacramento County. The county Hazardous Materials Division regulates the storage, use, and disposal of hazardous materials in Sacramento County by issuing permits, monitoring regulatory compliance, and investigating complaints. It oversees remediation of certain contaminated sites resulting from leaking USTs, reviews technical aspects of cleanup of hazardous substance sites, and provides assistance to public and private operations seeking to minimize the generation of hazardous substances.

Sacramento County Multi-Jurisdictional Local Hazard Mitigation Plan

The 2021 Local Hazard Mitigation Plan (LHMP) Update was prepared by the County, 7 unincorporated communities, and 24 special districts to reduce or eliminate long-term risk to people and property from hazards. The hazards identification assessment identified hazards, geographic extend, likelihood of future occurrences, magnitude/severity, significance, and climate change influence. The Mitigation Strategy comprises LHMP goals, objectives, and a mitigation action plan which includes mitigation action projects and implementation measures. The following goals are potentially relevant to the Capitol Mall Office Buildings Demolition Project (Sacramento County 2021):

- GOAL 1: Minimize risk and vulnerability of the Sacramento County community to the impacts of natural hazards, including consideration of the exacerbation of natural hazards and unique hazards due to climate change; and protect lives and reduce damages and losses to property, public health, economy, and the environment.
- GOAL 5: Assure conformance to federal and state hazard mitigation initiatives and maximize potential for mitigation implementation.

County of Sacramento Environmental Management Department

The County of Sacramento Environmental Management Department (SCEMD) is designated as the Sacramento region's Certified Unified Program Agency by the California Environmental Protection Agency (CalEPA). The CUPA Program streamlines and provides consistent regulatory activities, including inspections, permitting, and enforcement, for these specific environmental and emergency response areas: hazardous waste management, tiered permitting, and tanks. SCEMD requires preparation of a Hazardous Materials Business Plan for safe storage and use of chemicals above reportable quantities (55 gallons for liquids, 500 pounds for solids, and 200 cubic feet for compressed gases).

Area Plan for Emergency Response to Hazardous Materials Incidents in Sacramento County

SCEMD developed the Area Plan for Emergency Response to Hazardous Materials Incidents in Sacramento County to detail the duties and responsibilities of governmental and other response agencies in a hazardous material incident. The Area Plan provides information for agencies involved in hazardous materials response within Sacramento County, including, but not limited to, the Sacramento County Sheriff's Department, Sacramento City Fire Department, State OES, Sacramento County Health Department, Public Works, and the CHP, if needed to respond to a hazardous materials incident.

City of Sacramento 2040 General Plan

The following policies from the City of Sacramento 2040 General Plan pertain to hazardous materials and may be relevant to the project (City of Sacramento 2025):

Environmental Justice Element

- Policy EJ 1.6: Risks from Hazardous Facilities. The City shall review proposed facilities that would produce or store hazardous materials (gas, natural gas, or other fuels) to identify and require feasible mitigation for any significant risks. The review shall consider, at a minimum, the following:
  - Presence of seismic or geologic hazards;
  - Presence of hazardous materials;
  - Proximity to residential development and areas in which substantial concentrations of people exist, particularly disadvantaged communities (DACs) already overburdened by pollution; and
  - Nature and level of risk and hazard associated with the proposed project.
- Policy EJ 1.7: Transportation Routes. The City shall restrict transport of hazardous materials within Sacramento to designated routes.
- Policy EJ 1.8: Site Contamination. The City shall ensure buildings and sites are, or have been, investigated for the presence of hazardous materials and/or waste contamination before development, where applicable. The City shall continue to require remediation and construction techniques for adequate protection of construction

workers, future occupants, adjacent residents, and the environment, and ensure they are adequately protected from hazards associated with contamination.

City of Sacramento Department of Utilities

The City of Sacramento regulates the discharge of groundwater to the City's sewer and separated drainage systems. The City's Department of Utilities Engineering Services Policy No. 0001 requires approval of a memorandum of understanding (MOU) for long-term (more than 30 days), and an approval letter for short-term (fewer than 30 days), groundwater dewatering discharges to the City's sewer and/or separated drainage system. The MOU must cover proposed dewatering details, such as flow rate, system design, and contaminant monitoring plan. Discharges to the sewer must meet the levels approved by the Sacramento Area Sewer District (SacSewer) and the RWQCB. Dischargers to the sewer must obtain a SacSewer discharge permit. Discharges to the separated drainage system require approval from the RWQCB.

City of Sacramento All-Hazards Emergency Operations Plan

The City of Sacramento All-Hazards Emergency Operations Plan (EOP), adopted in 2025, provides guidance for those with emergency management responsibilities within the City of Sacramento. The EOP provides preparedness guidance, as well as specific guidance to those activated in the event of an emergency to save lives, enhance the health of citizens, and protect property and the environment. The City's Fire Department is responsible for recognition of potential hazardous materials and leading emergency response operations in the field during hazardous materials incidents. The County of Sacramento Department of Health and Human Services provides technical support for hazardous materials incidents. The Metro Fire Protection District provides hazardous material team response support.

Sacramento Metropolitan Air Quality Management District

The proposed project would be subject to Sacramento Metropolitan Air Quality Management District Rule 902 for asbestos abatement; 8 CCR Sections 1529 and 1532.1 (construction safety orders pertaining to asbestos and lead, respectively); and CFR Part 61, Subpart M (pertaining to asbestos). These regulations govern the specific methods to be used for removal of asbestos and lead based paint (LBP) and specify workplace safety measures that must be used to protect the health of construction workers during the removal process.

4.12.2 Environmental Setting

For purposes of this section, the term "hazardous materials" refers to both hazardous substances and hazardous wastes. A "hazardous material" is defined in the CFR as "a substance or material that … is capable of posing an unreasonable risk to health, safety, and property when transported in commerce" (49 CFR 171.8). California Health and Safety Code Section 25501 defines a hazardous material as follows:

> "Hazardous material" means any material that, because of its quantity, concentration, or physical, or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. "Hazardous materials" include, but are not limited to, hazardous substances, hazardous waste, and any material which a handler or the administering agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.

"Hazardous wastes" are defined in California Health and Safety Code Section 25141(b) as wastes that:

> … because of their quantity, concentration, or physical, chemical, or infectious characteristics, [may either] cause, or significantly contribute to an increase in mortality or an increase in serious illness [or] pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.

Asbestos, a naturally occurring fibrous material, was used as a fireproofing and insulating agent in building construction before such uses were largely banned by EPA in the 1970s. Because it was widely used prior to the discovery of its health

effects, asbestos is found in a variety of building materials, including sprayed-on acoustic ceiling texture, floor tiles, and pipe insulation. Asbestos exposure is a human respiratory hazard when it becomes friable (easily crumbled) because inhalation of airborne fibers is the primary mode of asbestos entry into the body. Asbestos-related health problems include lung cancer and asbestosis. Asbestos-containing building materials are considered hazardous by Cal/OSHA when bulk samples contain more than 0.1 percent asbestos by weight. These materials must be handled by a qualified contractor. Facilities condition assessments prepared for 800 Capitol Mall (EDD Headquarters Building) and 801 Capitol Mall (State Personnel Board Building) evaluated building infrastructure lifecycle repair and replacement needs over the ten-year lifecycle. Both assessments identified asbestos containing materials and recommended abatement (EMG 2015a, 2015b). The assessment for 800 Capitol Mall specified that ceiling tiles and older vinyl flooring will require asbestos abatement (EMG 2015b). Further, asbestos notifications were issued to notify employees, building tenants, contractors and vendors of the presence and location of building materials which contain or are assumed to contain asbestos at 800 Capitol Mall and 801 Capitol Mall. The notifications specified both materials, locations, and lab results status of "tested positive" or "assumed positive" (DGS 2021a, 2021b).

Lead can be found in old water pipes, solder, paint, and in soils around structures painted with LBPs. Lead accumulates in blood, soft tissues, and bones. LBPs are likely present on the buildings constructed prior to the late 1970s, when the quantity of lead in paints became regulated. Potentially hazardous exposures to lead can occur when LBP is improperly removed from surfaces by dry scraping, sanding, or open-flame burning. LBPs and coatings used on the exterior of buildings may have also flaked or oxidized and deposited into the surrounding soils. 801 Capitol Mall was determined to contain LBP and the facilities condition assessment recommended abatement (EMG 2015a).

A database search was conducted for the project site and surrounding areas to identify potential hazardous contamination sites. According to the California Department of Toxic Substances' (DTSC) EnviroStor database, there are no hazardous waste sites within the project site (DTSC 2026a). Additionally, there are no active hazardous waste sites within 0.25 miles of the project site. The A-B-C Cleaners (34720001) historical site, located approximately 800 feet north of the project site at 1120 7th Street, was contaminated by dry cleaning uses and was referred to another agency in November, 16, 1994; no potential contaminants of concern or actions are identified for this site (DTSC 2026b). Additionally, there are two military intervention sites, Mather Military Airfield (J09CA0012) (80000013) and Mather Storage Annex (J09CA0081) (80000054), both located approximately 1,000 feet southeast of the project site. These sites have had a "no further action required" status since 2010 and 2014, respectively (DTSC 2026c, 2026d). Note that although the EnviroStor website provides maps showing these sites as being in downtown Sacramento, the text descriptions identify the Mather Military Airfield (J09CA0012) (80000013) site as being in Plymouth in Amador County, and the Mather Storage Annex (J09CA0081) (80000054) site being in the City of Sacramento, but with no street address provided.

According to the SWRCB GeoTracker database, there are no active clean up sites at the project site. Within a 0.25-mile radius of the project site, there are 13 closed cases, including a cleanup program site and leaking underground storage tank sites (SWRCB 2026).

The following schools are located within a 0.25-mile of the project site:

- Growing Mindfully Preschool at 750 N Street, approximately 200 feet south
- Discovery Tree & Arista Preschool and Daycare at 744 P Street, approximately 1,010 feet south
- Teaching with Care Preschool at 901 P Street, approximately 940 feet southeast

The closest public schools are both approximately 0.65 miles south of the project site; William Land Elementary School serves transitional kindergarten through sixth grade and The Met Sacramento High School serves grades nine through twelve.

4.12.3 Environmental Impacts and Mitigation Measures

METHODOLOGY

Project construction and operation were evaluated against the hazardous materials information gathered from the sources identified above in Section 4.12.2, "Environmental Setting," to determine whether any risks to public health and safety or other conflicts would occur.

THRESHOLDS OF SIGNIFICANCE

A hazards and hazardous materials impact is considered significant if implementation of the Capitol Mall Office Buildings Demolition Project would do any of the following:

- create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment;
- emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
- be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment;
- for a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area;
- implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or
- expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

ISSUES NOT DISCUSSED FURTHER

As discussed in the Environmental Setting above, there are no hazardous materials sites regulated under Government Code Section 65962.5 present within the project site (DTSC 2026a; SWRCB 2026). Additionally, there are no active hazardous material sites within a 1,000-foot radius of the project site. The project would not create a significant hazard to the public or the environment from being located on or near a listed hazardous materials site and this issue is not evaluated further.

The project site is not located within an airport land use plan or within two miles of a public airport or public use airport, or within the vicinity of a private airstrip, and would not result in an aviation-related safety hazard for people residing or working in the project area. Therefore, this issue is not evaluated further.

The project site is in downtown Sacramento, an urban area that includes office buildings; apartments, high-rise condominiums, and other residences; parks; restaurants, and shops. The project site is not adjacent to or intermixed with wildlands. Therefore, the project would not expose people or structures to significant risk due to wildland fires and this issue is not evaluated further in this EIR.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 4.12-1: Storage, Use, Transport, or Upset of Hazardous Materials

Demolition and future redevelopment resulting from the Capitol Mall Office Buildings Demolition Project would involve the storage, use, and transport of hazardous materials at the project site. However, handling of hazardous materials would be in compliance with local, State, and federal regulations. Therefore, adverse impacts related to the creation of significant hazards to the public through routine transport, storage, use, disposal, and risk of upset would not occur. This impact would be **less than significant**.

Demolition

Project abatement and demolition would involve the temporary storage, use, and transport of hazardous materials (e.g., removal and transport of asbestos and LBP during abatement and use of fuels and lubricants in equipment during demolition). Transportation of hazardous materials on area roadways is regulated by the California Highway Patrol and California Department of Transportation, whereas use of these materials is regulated by DTSC, as outlined in 22 CCR. DGS would be required to use, store, and transport hazardous materials in compliance with local, State, and federal regulations during demolition activities. Because abatement and demolition activities would comply with existing hazardous materials regulations, impacts related to creation of significant hazards to the public through routine transport, use, disposal, and risk of upset would not occur. Therefore, this impact would be less than significant.

Future Development

Similar to demolition activities, future development, including construction and operation of future land uses, would involve the temporary storage, use, and transport of hazardous material. DGS would be required to comply with local, State and federal regulations regarding the use, storage, and transport of hazardous materials during construction and operation of future development. Construction of future land uses would involve hazardous materials and petroleum products (such as diesel fuel, lubricants, paints and solvents, and cement products containing strong basic or acidic chemicals) that are commonly used at construction sites. Operation of the ten land use types being considered for future development would likely involve the use of small amounts of common hazardous materials, such as cleaning supplies. Any storage or use of hazardous materials during construction and operation of future development would be required to comply with appropriate regulatory agency standards designed to avoid releases of hazardous materials. Because construction and operation of future development would comply with existing hazardous materials regulations, impacts related to creation of significant hazards to the public through routine transport, use, disposal, and risk of upset would not occur. Therefore, this impact would be less than significant.

Conclusion

As detailed above, both the demolition of the three office buildings as well as future development would involve the temporary storage, use, and transport of hazardous materials. Project adherence to safety laws and regulations regarding hazardous materials would reduce risks resulting from the routine transportation, use, storage, or disposal of hazardous materials associated with the project. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.12-2: Exposure of the Public or the Environment to Hazardous Materials

Past facility assessments for buildings on the project site identified hazardous materials including LBP and asbestos within the evaluated buildings. Based on this information the proposed demolition on the project site could result in the exposure of construction workers and the general public to hazardous materials. However, abatement, remediation, and disposal of hazardous materials in accordance with federal, State and local laws and regulations would prevent implementation of the project from resulting in significant risk to construction workers or the public from hazardous materials. Abatement of the project site would be completed prior to construction of future development, and during the construction and operation of future development, the same federal, State and local laws and regulations would prevent implementation of the project from resulting in significant risk to construction workers or the public from hazardous materials This impact would be **less than significant**.

Demolition

The project involves demolition of three office buildings, site grading, excavation for utilities, and backfilling. According to a review of the EnviroStor and GeoTracker databases, there are no recorded hazardous contamination sites at the project site or within a 0.25-mile radius. The facilities conditions assessments prepared for the EDD Headquarters Building and the State Personnel Board Building identified the presence of LBP and asbestos within the buildings (EMG 2015a, 2015b). Although the EDD Solar Building was constructed at a later date when building codes were more restrictive of use of building materials that might contain hazardous materials, hazardous materials may be present in the building. Demolition of each building would begin with abatement of LBP, asbestos, and any other hazardous materials that may be present. Without proper abatement, these materials could become airborne during demolition activities and create a hazard for construction workers at the project site and potential others in the immediate area.

Although there are no recorded hazardous materials sites on the project site that are identified in the EnviroStor and GeoTracker databases, there is potential for construction workers and the general public to be exposed to hazardous materials if there are previously unknown USTs or previously undiscovered hazardous materials contamination on the project site. Release and/or exposure to hazardous materials resulting from disturbance of previously unknown contamination could result in a safety hazard for people residing or working in the project area.

Contractors and the State would be required to comply with federal, State, and local regulations related to the abatement, remediation, and disposal of any contaminated or hazardous materials encountered during abatement and demolition, as well as regulations pertaining to worker safety. Compliance would also involve coordination with various agencies regarding appropriate methods to address any previously unknown contamination found at the project site, and disposal of hazardous materials in a manner consistent with applicable regulations at an appropriate off-site disposal facility. In addition, the Sacramento County Environmental Management Department must be notified if evidence of previously undiscovered soil or groundwater contamination (e.g., stained soil, odorous groundwater) is encountered during excavation and dewatering activities.

Because remediation and disposal of any identified hazardous materials would be implemented in accordance with federal, State, and local laws and regulations intended to protect workers and the public from exposure to hazardous materials, and compliance with these laws and regulations would be achieved, in part, through direct coordination with applicable regulatory agencies, this compliance with existing regulations would prevent the implementation of demolition activities from resulting in a significant risk to construction workers or the public from exposure to hazardous materials. Therefore, this impact would be less than significant.

Future Development

Prior to any future development, the project sites will already have undergone abatement for existing hazardous materials including asbestos and LBP during the demolition phase of the project. Further, as previously discussed, the project site is not known to be a hazardous contamination site according to a review of the EnviroStor and GeoTracker databases. While there is the potential to encounter previously undiscovered hazardous materials contamination during construction of future development, it is likely that these conditions would be identified, remediated and disposed of during the demolition stage. In the event hazardous materials are encountered during

future development, the entity conducting redevelopment would similarly be required to implement remediation and disposal in accordance with applicable laws and regulations, including coordination with various agencies regarding appropriate methods to address any contamination found at the project site, and disposal of hazardous materials in a manner consistent with applicable regulations at an appropriate off-site disposal facility. Adherence to these requirements would substantially minimize the potential for exposure of construction workers and the public to hazardous materials. Impacts would therefore be less than significant.

Conclusion

As discussed above, the demolition stage would involve abatement of known hazardous materials and, while unlikely, future development could encounter previously undiscovered hazardous materials contamination. DGS would implement abatement, remediation, and disposal, and any encounters with previously unknown hazardous materials, in accordance with federal, State and local laws and regulations intended to protect workers and the public from exposure to hazardous materials. These same laws and regulations would apply to future development activities. Compliance with these laws and regulations would prevent the implementation of the project from resulting in a significant risk to construction workers or the public from exposure to hazardous materials. Therefore, this impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.12-3: Emit Hazardous Emissions or Handle Hazardous or Acutely Hazardous Materials, Substances, or Waste within One-Quarter Mile of an Existing or Proposed School

Although demolition and future development at the project site would involve the use and transport of hazardous materials, project activities including abatement, handling, storage, transport, and disposal of these materials would be conducted in a manner compliant with federal, State, and local regulations. While there are preschools present within 0.25 miles of the project site, adherence to applicable regulations would reduce the potential for inadvertent exposure during demolition and future development. In addition, a health risk assessment (HRA) prepared for the project shows no significant health risk to people in the vicinity of the project site due to emissions from diesel engines during abatement and demolition. This impact would be **less than significant**.

The following schools are located within 0.25 miles of the project site:

- Growing Mindfully Preschool at 750 N Street, approximately 200 feet south;
- Discovery Tree & Arista Preschool and Daycare at 744 P Street, approximately 1010 feet south; and
- Teaching with Care Preschool at 901 P Street, approximately 940 feet southeast.

Therefore, project demolition and future development would handle hazardous materials within 0.25 miles of several existing preschools.

Demolition

Demolition includes the abatement of known asbestos and LBP and any other hazardous materials found in the project site buildings, as well as temporary storage, use, and transport of fuels, lubricants, and similar materials used to support the use of construction equipment. While there are no hazardous waste contamination sites identified in a database search and it is highly unlikely that existing hazardous contamination would be encountered during demolition activities, contractors and the State would be required to comply with federal, State, and local regulations related to the remediation and disposal of any yet-unknown contaminated materials encountered during demolition. Compliance would involve coordination with various agencies regarding appropriate methods to address any contamination found at the project site, and disposal of hazardous materials in a manner consistent with applicable regulations at an appropriate off-site disposal facility. Because abatement, remediation, and disposal of any identified hazardous materials would be implemented in accordance with federal, State, and local laws and regulations intended to protect workers and the public from exposure to hazardous materials, and compliance with these laws

and regulations would be achieved, in part, through direct coordination with applicable regulatory agencies, this compliance with existing regulations would prevent the implementation of the project from resulting in a significant risk to construction students and staff at nearby schools. Therefore, this impact would be less than significant.

As described in more detail in Section 4.6, "Air Quality," an HRA was prepared for the project to assess whether diesel particulate matter (diesel PM) emitted from project-generated truck trips during demolition activities would cause a significant health risk to individuals in the project vicinity. The HRA itself is provided in Appendix B. Diesel PM is considered a Toxic Air Contaminant by the California Air Resources Board. The HRA concluded that the abatement and demolition activities would not generate a significant health risk to people in the vicinity of the project site due to emissions from diesel engines. Therefore, impacts via this emissions mechanism are also less than significant.

Future Development

Construction of future development could also encounter previously undiscovered hazardous materials; however, these are likely to be identified and remediated during the demolition stage. Transportation, storage, use, and disposal of hazardous materials during construction and operation of future uses would be subject to federal, State, and local regulations. No identified future uses would result in the use, generation, transport, or storage of unusually high volumes of hazardous materials. As previously described, adherence with laws and regulations intended to protect workers and the public from exposure to hazardous materials would prevent implementation of the project from resulting in a significant risk to nearby schools. Therefore, this impact would be less than significant.

Conclusion

Demolition and future development involve use, storage, transport, and disposal of hazardous materials which would occur within 0.25 miles of three existing preschools. Adherence to applicable federal, State, and local regulations and laws related to hazardous materials and protection from exposure would minimize the risk of release of hazardous substances during demolition and future development activities, including emitting or handling hazardous materials within 0.25 miles of existing schools. Impacts would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.12-4: Impaired Implementation of or Physical Interference with an Adopted Emergency Response Plan or Emergency Evacuation Plan

Demolition and construction of future development would require temporary lane or street closures, which could affect emergency access and evacuation routes. DGS and entities implementing future development would prepare a construction traffic control plan, consistent with Section 12.20.20 of the Sacramento City Code, which would minimize construction impacts related to potential interference with emergency response or evacuation. In addition, the project site is located within a downtown street grid; therefore, various alternative routes are available to access the project site and nearby locations. This impact would be **less than significant**.

Demolition

During project demolition, it would be necessary to restrict and redirect pedestrian, bicycle, and vehicular movements around the site to accommodate material hauling to and from the site and activities at the site, including demolition, construction, staging, and modifications to existing infrastructure. Restricting access to the site and accommodating material hauling could include lane closures, lane narrowing, and detours, which would be temporary. Potential lane restrictions or closures and/or sidewalk closures could occur along Capitol Mall between 7th and 9th Streets; along 7th, 8th, and 9th Streets between O Street and Capitol Mall; and along 8th Street between Capitol Mall and L Street, restricting vehicular, pedestrian, and bicycle access in these areas. However, the project site is located within a downtown street grid; therefore, various alternative routes are available to access the project site and nearby locations if there are access disruptions on these roads. It is assumed that demolition activities would avoid disturbance of light rail line operation, other than three separate anticipated short-term closures of 8th Street

required for demolition of the EDD Headquarters Building sky bridge (see Section 3.4.1, "Building Demolition," for more information on this closure of 8th Street).

DGS would prepare a construction traffic control plan, consistent with Section 12.20.20, "Closure of Streets for Work—Traffic Control Plan," of the Sacramento City Code, that illustrates the location of the proposed work area, identifies the location of areas where the public right-of-way would be closed or obstructed and the placement of traffic control devices necessary to perform the work, shows the proposed phases of traffic control, and identifies the periods when the traffic control would be in effect and when work would prohibit access to private property from a public right-of-way. The plan may be modified by the City at any time to eliminate or avoid traffic conditions that are hazardous to the safety of the public. However, Section 12.20.20 does not require a traffic control plan to provide information on access for emergency vehicles. Therefore, the traffic control plan prepared for the project would also provide information on access for emergency vehicles to prevent interference with emergency response. Security fencing and any other security measures installed as part of the building abatement and demolition process to prevent public entry will be retained to prevent unauthorized entry to the parcels. However, the contractor will coordinate with law enforcement, fire, and other agencies to provide mechanisms for continuous access to emergency personnel, such as providing copies of lock keys, or having security personnel on site at all times to open gates. As a result, implementation of project demolition would not impair implementation of emergency response or evacuation plans. This impact would be less than significant.

Future Development

Following project demolition, construction of future development would similarly require restricted and redirected pedestrian, bicycle, and vehicular movements around the site to accommodate material hauling to and from the site and construction activities at the site. As discussed above, potential lane restrictions or closures and/or sidewalk closures could occur along Capitol Mall between 7th and 9th Streets; along 7th, 8th, and 9th Streets between O Street and Capitol Mall; and along 8th Street between Capitol Mall and L Street. Prior to construction of any future development that would require restrictions or closures of City streets or sidewalks, the land transfer recipient would coordinate with the City of Sacramento to prepare a construction traffic control plan that illustrates the location of the proposed work areas; identifies the location of areas where the public right-of-way would be closed or obstructed and the placement of traffic control devices necessary to perform the work; shows the proposed phases of traffic control; and identifies the time periods when the traffic control would be in effect and the time periods when work would prohibit access to private property from a public right-of-way. The traffic control plan would also provide information on access for emergency vehicles to prevent interference with emergency response. Future land uses would take advantage of proximity to nearby transit assets (e.g. bus, light rail) to support safe and efficient movement of pedestrians, bicyclists, and other micro-mobility. The entity conducting redevelopment would also be subject to applicable emergency access requirements. Therefore, project implementation would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. This impact would be less than significant.

Conclusion

Both demolition and construction of future development would involve restricted or redirected pedestrian, bicycle, and vehicular access surrounding the project site. DGS and entities implementing future development would prepare construction traffic control plans that would provide information on access for emergency vehicles to prevent interference with emergency response. Preparation of the construction traffic control plan in coordination with the City would prevent impairment of emergency response or evacuation plans as a result of project implementation. Therefore, this impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

4.13 CULTURAL RESOURCES

This section analyzes and evaluates the potential impacts of the project on known and unknown cultural resources. Cultural resources include districts, sites, buildings, structures, or objects generally older than 50 years and considered to be important to a culture, subculture, or community for scientific, traditional, religious, or other reasons. They include precontact resources and historic-period resources. Archaeological resources are locations where human activity has measurably altered the earth or left deposits of precontact or historic-period physical remains (e.g., stone tools, bottles, former roads, house foundations). Historical (or built environment) resources include standing buildings (e.g., houses, barns, outbuildings, cabins) and intact structures (e.g., dams, bridges, roads, districts), or landscapes. A cultural landscape is defined as a geographic area (including both cultural and natural resources and the wildlife therein), associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values.

No comment letters regarding cultural resources were received in response to the Notice of Preparation (see Appendix A).

4.13.1 Regulatory Setting

FEDERAL

National Register of Historic Places

The National Register of Historic Places (NRHP) is the nation's master inventory of known historic properties. It is administered by the National Park Service and includes listings of buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, or cultural significance at the national, state, or local level.

The formal criteria (36 CFR 60.4) for determining NRHP eligibility are as follows:

1. The property is at least 50 years old (however, properties under 50 years of age that are of exceptional importance or are contributors to a district can also be included in the NRHP);
2. It retains integrity of location, design, setting, materials, workmanship, feeling, and associations; and
3. It possesses at least one of the following characteristics:

   Criterion A Is associated with events that have made a significant contribution to the broad patterns of history (events).

   Criterion B Is associated with the lives of persons significant in the past (persons).

   Criterion C Embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant, distinguishable entity whose components may lack individual distinction (architecture).

   Criterion D Has yielded, or may be likely to yield, information important in prehistory or history (information potential).

<u>Special Criteria Considerations</u>

Ordinarily cemeteries, birthplaces, or graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past 50 years shall not be considered eligible for the National Register. However, such properties will qualify if they are integral parts of districts that do meet the criteria or if they fall within the following categories:

A. a religious property deriving primary significance from architectural or artistic distinction or historical importance; or

B. a building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or

C. a birthplace or grave of a historical figure of outstanding importance if there is no other appropriate site or building directly associated with his or her productive life; or

D. a cemetery that derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or

E. a reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or

F. a property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own historical significance; or

G. a property achieving significance within the past 50 years if it is of exceptional importance.

For a property to retain and convey historic integrity it must possess most of the seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. Location is the place where the historic property was constructed or the place where a historic event occurred. Integrity of location refers to whether the property has been moved since its construction. Design is the combination of elements that create the form, plan, space, structure, and style of a property. Setting is the physical environment of a historic property that illustrates the character of the place. Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property. Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory. Feeling is a property's expression of the aesthetic or historic sense of a particular period of time. This is an intangible quality evoked by physical features that reflect a sense of a past time and place. Association is the direct link between an important historic event or person and a historic property. Continuation of historic use and occupation help maintain integrity of association.

Listing in the NRHP does not entail specific protection or assistance for a property but it does guarantee consideration in planning for federal or federally assisted projects, eligibility for federal tax benefits, and qualification for federal historic preservation assistance. Additionally, project effects on properties listed in the NRHP must be evaluated under CEQA.

The National Register Bulletin series was developed to assist evaluators in the application of NRHP criteria. For example, National Register Bulletin #36 provides guidance in the evaluation of archaeological site significance. If a property cannot be placed within a particular theme or time period, and thereby lacks "focus," it will be unlikely to possess characteristics which would make it eligible for listing in the NRHP.

STATE

California Register of Historical Resources

All properties in California that are listed in or formally determined eligible for listing in the NRHP are also listed in the California Register of Historical Resources (CRHR). The CRHR is a listing of State of California resources that are significant in the context of California's history. It is a Statewide program with a scope and with criteria for inclusion similar to those used for the NRHP. In addition, properties designated under municipal or county ordinances are also eligible for listing in the CRHR.

A historical resource must be significant at the local, state, or national level under one or more of the criteria defined in the California Code of Regulations Title 15, Chapter 11.5, Section 4850 to be included in the CRHR. The CRHR criteria are tied to CEQA because any resource that meets the criteria below is considered a significant historical resource under CEQA. As noted above, all resources listed in or formally determined eligible for listing in the NRHP are automatically listed in the CRHR.

The CRHR uses four evaluation criteria:

Criterion 1. Is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.

Criterion 2. Is associated with the lives of persons important to local, California, or national history.

Criterion 3. Embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of a master; or possesses high artistic values.

Criterion 4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

Similar to the NRHP, a historical resource must meet one of the above criteria and retain integrity to be listed in the CRHR. The CRHR uses the same seven aspects of integrity used by the NRHP.

Special (Criteria) Considerations

1. Moved buildings, structures, or objects. The State Historical Resources Commission encourages the retention of historical resources on site and discourages the non-historic grouping of historic buildings into parks or districts. However, it is recognized that moving an historic building, structure, or object is sometimes necessary to prevent its destruction. Therefore, a moved building, structure, or object that is otherwise eligible may be listed in the California Register if it was moved to prevent its demolition at its former location and if the new location is compatible with the original character and use of the historical resource. An historical resource should retain its historic features and compatibility in orientation, setting, and general environment.
2. Historical resources achieving significance within the past fifty years. In order to understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than fifty years old may be considered for listing in the California Register if it can be demonstrated that sufficient time has passed to understand its historical importance.
3. Reconstructed buildings. Reconstructed buildings are those buildings not listed in the California Register under the criteria in Section 4852(b)(1), (2), or (3) of this chapter. A reconstructed building less than fifty years old may be eligible if it embodies traditional building methods and techniques that play an important role in a community's historically rooted beliefs, customs, and practices; e.g., a Native American roundhouse.

California Historical Landmarks

California Historical Landmarks (CHLs) are numbered sequentially as they are listed by the State Historical Resources Commission. CHLs numbered 770 and above are automatically listed in the CRHR. According to the California Public Resources Code (PRC) Section 5031(a), to be eligible for CHL designation, a property must be of statewide historical importance and must demonstrate its statewide significance by meeting one of the following three requirements:

1. The property is the first, last, only, or most significant historical property of its type in the region. The regions are Southern California, Central California, and Northern California. If a property has lost its historic appearance (integrity), it may still be listed as a site.
2. The property is associated with an individual or group having a profound influence on the history of California. The primary emphasis should be the place or places of achievement of an individual. Birthplace, death place, or place of interment shall not be a consideration unless something of historical importance is connected with the person’s birth or death. If a property has lost its historic appearance (integrity), it may still be listed as a site.
3. The property is a prototype of, or an outstanding example of, a period, style, architectural movement, or construction, or it is one of the more notable works, or the best surviving work in a region of a pioneer architect, designer, or master builder. An architectural landmark must have excellent physical integrity, including integrity of location. An architectural landmark generally will be considered on its original site, particularly if its significance is basically derived from its design relationship to its site. Note: Only preeminent examples will be listed for architectural importance. Good representative examples of a style, period, or method of construction are more appropriately nominated to other registration programs.

California Environmental Quality Act

CEQA requires public agencies to consider the effects of their actions on "historical resources," and "unique archaeological resources." Pursuant to PRC Section 21084.1, a "project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment." Section 21083.2 requires agencies to determine whether projects would have effects on unique archaeological resources.

Historical Resources

"Historical resource" is a term with a defined statutory meaning (PRC Section 21084.1; State CEQA Guidelines Sections 15064.5[a] and [b]). Under State CEQA Guidelines Section 15064.5(a), historical resources include the following:

1) A resource listed in, or determined to be eligible by the State Historical Resources Commission for listing in, the CRHR (PRC Section 5024.1).

2) A resource included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g), will be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

3) Any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource will be considered by the lead agency to be historically significant if the resource meets the criteria for listing in the CRHR (PRC Section 5024.1).

4) The fact that a resource is not listed in or determined to be eligible for listing in the CRHR, not included in a local register of historical resources (pursuant to PRC Section 5020.1[k]), or identified in a historical resources survey (meeting the criteria in PRC Section 5024.1[g]) does not preclude a lead agency from determining that the resource may be a historical resource as defined in PRC Sections 5020.1(j) or 5024.1.

Unique Archaeological Resources

CEQA also requires lead agencies to consider whether projects will affect unique archaeological resources. PRC Section 21083.2(g) states that "unique archaeological resource" means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets one or more of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.

2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.

3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Public Resources Code Section 21083.2

Treatment options under PRC Section 21083.2(b) to mitigate impacts to archaeological resources include activities that preserve such resources in place in an undisturbed state. PRC Section 21083.2 states:

(a) As part of the determination made pursuant to Section 21080.1, the lead agency shall determine whether the project may have a significant effect on archaeological resources. If the lead agency determines that the project may have a significant effect on unique archaeological resources, the environmental impact report shall address the issue of those resources. An environmental impact report, if otherwise necessary, shall not address the issue of nonunique archaeological resources. A negative declaration shall be issued with respect to a project if, but for the issue of nonunique archaeological resources, the negative declaration would be otherwise issued.

(b) If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left

in an undisturbed state. Examples of that treatment, in no order of preference, may include, but are not limited to, any of the following:

(1) Planning construction to avoid archaeological sites.

(2) Deeding archaeological sites into permanent conservation easements.

(3) Capping or covering archaeological sites with a layer of soil before building on the sites.

(4) Planning parks, greenspace, or other open space to incorporate archaeological sites.

(c) To the extent that unique archaeological resources are not preserved in place or not left in an undisturbed state, mitigation measures shall be required as provided in this subdivision.

(d) Excavation as mitigation shall be restricted to those parts of the unique archaeological resource that would be damaged or destroyed by the project.

(e) In no event shall the amount paid by a project applicant for mitigation measures required pursuant to subdivision (c) exceed the following amounts:

(1) An amount equal to one-half of 1 percent of the projected cost of the project for mitigation measures undertaken within the site boundaries of a commercial or industrial project.

(2) An amount equal to three-fourths of 1 percent of the projected cost of the project for mitigation measures undertaken within the site boundaries of a housing project consisting of a single unit.

(3) If a housing project consists of more than a single unit, an amount equal to three-fourths of 1 percent of the projected cost of the project for mitigation measures undertaken within the site boundaries of the project for the first unit plus the sum of the following:

(A) Two hundred dollars ($200) per unit for any of the next 99 units.

(B) One hundred fifty dollars ($150) per unit for any of the next 400 units.

(C) One hundred dollars ($100) per unit in excess of 500 units.

(f) Unless special or unusual circumstances warrant an exception, the field excavation phase of an approved mitigation plan shall be completed within 90 days after final approval necessary to implement the physical development of the project or, if a phased project, in connection with the phased portion to which the specific mitigation measures are applicable. However, the project applicant may extend that period if he or she so elects. Nothing in this section shall nullify protections for Indian cemeteries under any other provision of law.

Public Resources Code, Section 5024

The California State Legislature enacted PRC Sections 5024 and 5024.5 as part of a larger effort to establish a State program to preserve historical resources. These sections of the code require State agencies to take a number of actions to ensure preservation of State-owned historical resources under their jurisdictions. These actions include evaluating resources for NRHP eligibility and CHL eligibility, maintaining an inventory of eligible and listed resources, and managing these historical resources so that that they will retain their historic characteristics.

PRC Section 5024(f) requires state agencies to submit to the State Historic Preservation Officer (SHPO) for comment documentation for any project having the potential to affect historical resources under its jurisdiction listed in or potentially eligible for inclusion in the NRHP or are registered or eligible for registration as CHLs. The SHPO has 30 days after receipt of the notice for review and comment.

Capitol View Protection Act

The Capitol View Protection Act (Government Code Section 8162 et seq.) was enacted in 1992 to maintain the visual prominence of the State Capitol by setting height restrictions in zones surrounding the Capitol building (see Figure 4.17-1 in Section 4.17, "Aesthetics, Light, and Glare," in this Draft EIR), and to maintain the existing urban edge of surrounding streets by requiring certain building setbacks. The Capitol View Protection Act identifies a height

restriction of 150 feet for the eastern portions of the State Personnel Board Building and the EDD Headquarters on the 800 block of Capitol Mall, 300 feet for the western portions of the State Personnel Board Building and EDD Headquarters on the 800 block of Capitol Mall, and 400 feet for the western portion of the EDD Headquarters on the 700 block of Capitol Mall and the EDD "Solar Building" Annex.

California Native American Historical, Cultural, and Sacred Sites Act

The California Native American Historical, Cultural, and Sacred Sites Act (PRC Section 5097.9) applies to both State and private lands. The act requires, upon discovery of human remains, that construction or excavation activity cease and that the county coroner be notified. If the remains are those of a Native American, the coroner must notify the Native American Heritage Commission (NAHC), which notifies and has the authority to designate the most likely descendant (MLD) of the deceased. The act stipulates the procedures the descendants may follow for treating or disposing of the remains and associated grave goods.

Health and Safety Code, Sections 7050.5

Section 7050.5 of the Health and Safety Code requires that construction or excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If they are determined to be those of a Native American, the coroner must contact NAHC.

Public Resources Code, Section 5097

PRC Section 5097 specifies the procedures to be followed if human remains are unexpectedly discovered on nonfederal land. The disposition of Native American burials falls within the jurisdiction of NAHC. Section 5097.5 of the code states:

> No person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor.

LOCAL

The buildings on the project site are located on State-owned property and would be demolished by the Department of General Services (DGS) and subsequent development is presumed to be undertaken by the California State University, Sacramento (Sacramento State), another State agency. As explained in Section 4.2, "Land Use and Planning," of this Draft EIR, under Section 4.2.1, "Local," state agencies are not subject to local plans, policies, and zoning regulations. Nevertheless, in the exercise of its discretion, DGS does reference, describe, and address local plans, policies, and regulations that are applicable to the project. This evaluation is also intended to be used by local agencies for determining, as part of their permit processes, the project's consistency with local plans, policies, and regulations.

City of Sacramento 2040 General Plan

The following policies from the City of Sacramento 2040 General Plan Historic and Cultural Resources Element are relevant to the analysis of effects on cultural resources:

- **Policy HCR-1.3:** Compatibility with Historic Context. The City will continue to review new development, alterations, and rehabilitation/remodels for compatibility with the surrounding historic context and consistency with design guidelines/standards, including the Historic District Plans. The City shall pay special attention to the scale, massing, and relationship of proposed new development to complement surrounding historic environments.
- **Policy HCR-1.6:** Early Project Consultation. The City will continue to strive to minimize impacts to historic and cultural resources by consulting with property owners, land developers, tribal representatives, and the building industry early in the development review process as needed.

- **Policy HCR-1.10:** Demolition. Consistent with Secretary of the Interior Standards, the City shall consider demolition of historic resources as a last resort, to be permitted only if rehabilitation or adaptive reuse of the resource is not feasible; demolition is necessary to protect the health, safety, and welfare of its residents; or the public benefits outweigh the loss of the historic resource.
- **Policy HCR-1.14:** Archaeological, Tribal, and Cultural Resources. The City shall continue to comply with federal and State regulations and best practices aimed at protecting and mitigating impacts to archaeological resources and the broader range of cultural resources as well as tribal cultural resources.
- **Policy HCR-1.17:** Evaluation of Archeological Resources. The City shall work in good faith with interested communities to evaluate proposed development sites for the presence of sub-surface historic, archaeological, and tribal cultural resources that may be present at the site. These efforts may include the following:
  - Consideration of existing reports and studies,
  - Consultation with Native American tribes as required by State law,
  - Appropriate site-specific investigative actions, and
  - Onsite monitoring during excavation if appropriate.
- **Policy HCR-1.18:** Evaluation of Potentially Eligible Built Environment Resources. The City shall continue to evaluate all buildings and structures 50 years old and older for potential historic significance prior to approving a project that would demolish or significantly alter the resource.

The City of Sacramento 2040 Land Use Element also includes the following policy pertaining to the analysis of effects on cultural resources:

- **Policy LUP 8.10:** Responsiveness to Context. The City shall require building and site design that respects and responds to the local context, including use of local materials and plant species where feasible, responsiveness to Sacramento's climate, and consideration of cultural and historic context of Sacramento's neighborhoods, corridors, and centers.

Sacramento Planning and Development Code Chapter 17.604

Chapter 17.604 (Historic Preservation) of the City's Planning and Development Code includes provisions for the identification of significant historic, prehistoric and cultural resources, structures, districts, sites, landscapes, and properties within the City. This chapter also includes mechanisms and procedures to protect and encourage the preservation of the city's historic and cultural resources, as well as establishes the preservation commission and the responsibilities of the City's Preservation Director and the eligibility criteria for the Sacramento Register of Historic and Cultural Resources.

Sacramento Central City Urban Design Guidelines

The City has design guidelines for each design review district within the city. The guidelines are used by the City's Design Review and Preservation Board to integrate projects with the appearance, scale, capacity, and character of various neighborhoods or districts in the city. The Capitol Mall Office Buildings Demolition Project is located in the Central Business District and the Central Core Design Guidelines Area (City of Sacramento 2018). These guidelines convey the City's expectations for design excellence in the Central City.

The Central Core District Design Guidelines sets forth a long- term vision for the physical form and character of Sacramento's downtown and a comprehensive set of design guidelines for developing downtown Sacramento to its fullest potential. The intent is to ensure that all development in the Central Core contributes to making downtown Sacramento a unique and special place, and furthers Sacramento's aspiration to be "America's Most Livable City" (City of Sacramento 2018).

4.13.2 Environmental Setting

REGIONAL PRECONTACT HISTORY

The archaeology of Sacramento County is included within the broad framework established by archaeologists for the Sacramento Valley. The taxonomic framework of the Sacramento Valley has been described in terms of archaeological patterns. A pattern is a general mode of life characterized archaeologically by technology, particular artifacts, economic systems, trade, burial practices, and other aspects of culture.

The earliest presence of humans in California dates to the Paleo-Indian Period (10,000–6000 before the current era [BCE]) of the Late Pleistocene. People lived in small and highly mobile bands, hunting and gathering along ancient pluvial lakeshores (formed in a closed desert basin during the last ice age). Such behavior has been evidenced by fluted projectile points and chipped stone crescent forms (Fredrickson 1973; Moratto 1984).

Few archaeological sites have been found in the Sacramento Valley that date to the Paleo-Indian or the subsequent Lower Archaic (6000–3000 BCE) time periods. This may be due to high sedimentation rates at the confluence of the Sacramento and American rivers, leaving the earliest sites deeply buried and inaccessible. Archaeologists have recovered a great deal of data from sites occupied by the Middle Archaic Period (3000–1000 BCE).

In the Sacramento region, the Windmiller Pattern dates to the Middle Archaic Period. The Windmiller Pattern is recognized by an increased emphasis on acorns, a continuation of hunting and fishing activities, as well as more intensive procurement practices. Ground and polished charmstones, twined basketry, baked-clay artifacts, and worked shell and bone are hallmarks of Windmiller culture. Widely ranging trade patterns brought goods in from the Coast Ranges and trans-Sierran sources, as well as closer trading partners. Distinctive burial practices (ventrally extended, oriented westward) identified with the Windmiller Pattern also appeared in the Sierra Nevada foothills, indicating possible seasonal migration into the Sierra Nevada (Stevens et al. 2009).

During the Upper Archaic Period (1000 BCE–500 into the current era [CE]), formalized and regular sustained trade between groups are demonstrated for the first time. Assemblages dating to this period in the lower Sacramento Valley are consistent with the Berkeley Pattern. Distinguished by distinctive stone and shell artifacts and a reliance on acorns as a food source. Flex burials accompanied with red ocher predominated. Minimally shaped mortar and pestle technology was much more prevalent than the mano/metate, and nonstemmed projectile points became more common. Berkeley traits may have developed in the San Francisco Bay area and were spread through the migration of Plains Miwok Indians (Bennyhoff and Fredrickson 1969).

Significant technological and social developments characterized the Emergent Period (CE 500–1800). The introduction of the bow and arrow ultimately replaced the dart and atlatl. Distinctions in an individual's social status could be linked to acquired wealth. Later in this period (CE 1500–1800), highly regularized and sophisticated exchange relations utilized the clamshell disk bead as a monetary unit. Various aspects of material goods production and exchange as well as inter and intra-group rituals were regulated by specialists. Territorial boundaries between ethno-linguistic groups encountered at the time of European contact became well established (Hamilton et al. 2005).

The Emergent Period in the lower Sacramento Valley is represented by the Augustine Pattern (Bennyhoff and Fredrickson 1969), a widespread central California pattern assigned to the Late Horizon (approximately CE 500 to the historic period). Cultural evolution may have been stimulated by the southern migration of Wintuan people from north of the Sacramento Valley. Food procurement strategies, as well as trade activities intensify along with fishing, hunting, and gathering. Complex exchange systems, and a wider variety in mortuary practices including cremation for some high-status individuals are hallmarks of this pattern.

Initial research work in the Sacramento region, from the 1950s and earlier, generally indicates that the northern portion of the Sacramento Valley was culturally more closely affiliated with the Shasta/Oroville area. The associations between the cultures of the southern Sacramento Valley, northern San Joaquin Valley, and the Sacramento-San Joaquin Delta became apparent during study conducted in the 1950s and 1960s.

While the problem of alluvial deposition covering older sites has been discussed in relation to Sacramento Valley archaeology (Moratto 1984), numerous sites in the Sacramento region have been identified and excavated, guiding archaeologists toward a more refined interpretation of local cultural patterns.

HISTORIC SETTING

Regional History

Early Exploration and Settlement

California was visited by every major European naval power but was claimed by the Spanish Empire in approximately 1602. The first California mission was established in 1769, in San Diego. Over the next 50 years, the Spanish government with the aid of various Roman Catholic orders established 21 missions throughout "Alta California." Lieutenant Gabriel Moraga and 13 soldiers traveled to the Sacramento Valley from Mission San José in 1808 but reported that the area would not be suitable for a mission site. Moraga is credited with naming the lower Sacramento River and the valley region "Sacramento" ("the Holy Sacrament").

Mexico's independence from Spain in 1822 resulted in the secularization of the missions, and the period is marked by an extensive era of land grants and by exploration by American and Canadian fur trappers west of the Sierra Nevada. In 1839, John Sutter, born a citizen of Switzerland, obtained permission from Mexican Governor Juan Bautista Alvarado to establish an inland settlement; in 1840, he was awarded the 48,839-acre grant that included the project site and stretched north to the Sutter Buttes. Between 1841 and 1844, Sutter constructed an adobe fort (now Sutter's Fort State Park on L and 27th streets) on the land. Sutter named his trading and agricultural empire New Helvetia (New Switzerland). At the initiation of the Mexican-American War in 1846, he disavowed his loyalty to the Mexicans and raised the Stars and Stripes over New Helvetia.

California was ceded as a territory to the United States following the end of the Mexican-American War in 1848. By 1849, nearly 90,000 people had journeyed to the gold fields, and in 1850, California became the 31st state. Sutter's agricultural empire struggled as his workers and associates were lured away by prospecting. Creditors, mistakenly assuming Sutter had claim to the gold at Coloma, forced him to transfer his holdings to his son, John. John, seeking to pay off his father's debts, designated 4 square miles of the original Mexican land grant as the site for the new town, Sacramento, and commissioned a survey. A grid pattern for the town, with east-west streets designated by numbers and north-south streets by letters of the alphabet, was developed in 1848 on the land east of the embarcadero along Front Street. Each street measured 80 feet wide, with the exception of Front and M streets, which measured 100 feet wide. M Street was later renamed Capitol Mall and Capitol Avenue, east and west of the State Capitol building, respectively.

Lots within the new town were initially sold for $250 near the fort and $500 near the embarcadero. The same lots soon sold for 10 times their original price, and stores, saloons, and gambling houses sprang up to empty the newly filled pockets of the miners arriving at the embarcadero on Front Street. As the commercial center of Sacramento began to favor the riverfront, more and more canvas and semipermanent structures opportunistically arose (California State Capitol Museum 2016; Historic State Capitol Commission 2013; Woodward 1981).

Project Area History

Establishing a Capital City, State Capitol Building, and Capitol Park

The bustling Gold Rush boomtown of Sacramento served as a river transportation hub, providing critical access to the mining districts in the foothills. In 1850, only 1 year after it was founded, Sacramento was incorporated as a city, and in 1854, Sacramento became the state capital. Although businesses and industries supporting the Gold Rush and the growing population of Sacramento boomed, the city itself suffered multiple catastrophes. A series of events—fires in 1852 and 1854 and floods in 1853, 1854, 1861–1862, and 1878—motivated wealthy members of the city to construct levees and bulwarks and raise streets to protect people, homes, and businesses. Between 1864 and 1878, the streets and buildings between the east bank of the Sacramento River along Front Street to 12th Street and between I and L streets were raised 4–15 feet. Retaining walls strengthened by brick bulwarks or buttresses were constructed with locally fired

bricks, sand and gravel hauled in by the wagonload from the American River or from local farms were used as street fill, buildings were jacked up, and the first stories of many downtown buildings became subterranean. Because of the severe flooding issues, the city also straightened and dug a new mouth for the American River between 1864 and 1868.

In 1856, the California Legislature voted to build a new State Capitol building for $300,000. In 1860, four blocks bounded by 10th, 12th, L, and N streets were donated by the city as a site for the new building and construction began in December. The site was located on the southeast edge of the city, where a few scattered buildings stood on large parcels in a semirural area. The city condemned the property, removed people from their homes, and sold the homes, outbuildings, fences, fruit trees, and shrubbery at auction (Woodward 1981).

By 1869, enough of the Capitol had been built to allow legislative sessions to convene within its walls. Construction of the new State Capitol building was completed in 1874, with the cost of construction totaling $500,000. In the 1870s, more land was donated to create what would become Capitol Park. The land was terraced around the raised Capitol, with cascading stone steps and balustrades, as well as plantings of flowers, trees and other plants (Dreyfuss + Blackford Architecture and Page & Turnbull 2006). The monumental design of the State Capitol combined with its setting within Capitol Park lent gravitas to the state of California, which at the time was fairly isolated from the rest of the country. The State Capitol was designed with neoclassical architectural features common to the U.S. Capitol building in Washington, D.C., and other state capitals.

By 1872, the original four-block area housing the State Capitol building and surrounding gardens had been increased to the 10 blocks bordered by 10th, 15th, L, and N streets. Beautification of the park, "considered one of the most beautiful State Capitol grounds in the nation," began in 1869 (California State Capitol Museum 2016). The area was graded, and silt and soil from the bed of the Sacramento River were used to enrich the land for planting, ultimately raising it "to a height of approximately ten feet" near completion of the Capitol building in 1874 (Woodward 1981: 37). The newer sections of the gardens were designed to have a more natural, parklike feel. Among the varieties of native and exotic trees and flowering shrubs in the park is the row of California fan palms, planted in 1882, that still flank the park's perimeter.

As the 1950s and 1960s progressed, the growing size of the government meant that plans for more space for the Capitol were frequently discussed. Several plans, including the idea of completely rebuilding the Capitol and moving to high rise towers, were considered, but in the end, restoration of the seismically unsound Capitol won out (Dreyfuss + Blackford Architecture and Page & Turnbull 2006).

Growth of Modern Capital Neighborhood

Sacramento continued to grow in the 1860s and became more culturally diverse as various ethnic groups, such as African American, Chinese, German, Irish, Italian, Portuguese, and Japanese immigrants, came to the region seeking employment, many because of construction of the first transcontinental railroad. The majority of the immigrants were clustered in ethnic neighborhoods in what came to be known as the West End, defined roughly as the area from the riverfront eastward to 10th Street and from the Southern Pacific Railroad railyards south to R Street.

With construction of the new State Capitol building, between 1860 and 1874, the area surrounding the Capitol building soon became a popular residential neighborhood that boasted fashionable houses. Sanborn Fire Insurance maps from 1895 depict opulent Italianate and vernacular style family homes fronting the L, N, and 10th Street blocks north, south, and west of the Capitol building, with most of the parcels along 15th Street east of Capitol grounds vacant.

In 1900, Sacramento had a population of 30,000, covering an area of about 4 square miles. A decade later, the population reached 45,000. City streets averaged 80 feet wide and had electric lights. M Street (now Capitol Mall/Capitol Avenue) and Front Street remained 100 feet wide. Gas was in general use for illumination in the city by the 1860s. Electric light became available in 1895, and by the turn of the century, systems of electric trolleys were replacing horse carts. Passenger service near the Capitol building was also provided by the Northern Electric Railway (later Sacramento Northern) along M Street (Capitol Mall) and the Central California Traction Company Railroad along 8th Street.

Modern State Government Buildings around Capitol Park

In 1917, the city donated two blocks bounded by 9th, 10th, L, and N streets immediately west of the State Capitol building to house two new government buildings. Construction of State Office Building No. 1 (now Jesse M. Unruh Office Building) and the Stanley Mosk Library and Courts Building, two buildings that were part of the Capitol Extension Group, began in 1922 and was completed in 1928. Another part of the Capitol Extension Group, the Capitol Fountain Plaza, located between the two buildings, was operating 2 years before the buildings were finished.

In 1929, an urban planning firm proposed that monumental buildings be constructed on M Street west of the Capitol building (present-day Capitol Mall). During the mid-1930s, additional State office buildings were added across N Street facing the Capitol building: the Department of Motor Vehicles building in 1936 (currently California Department of Food and Agriculture building), the Public Works building in 1937 (currently housing the California Department of Transportation [Caltrans]), and the Legislative Office Building (formerly Business and Professions building) in 1939.

In 1940, the State Planning Board and Division of Architecture recommended that State office buildings be constructed around Capitol Park instead of to the west along M Street/Capitol Mall. In response to this recommendation, all State buildings and additions were constructed immediately around the Capitol building and Capitol Park until the 1950s. As the government continued to grow, subsequent development was no longer restricted to the vicinity around the Capitol building. Three new government buildings were completed on Capitol Mall in the 1950s. Three additional buildings were built in the late 1940s/1950s facing O Street (Lemon and Davis 2018). Between 1949 and 1952, the original Capitol building was enlarged by construction of the Annex on the east side.

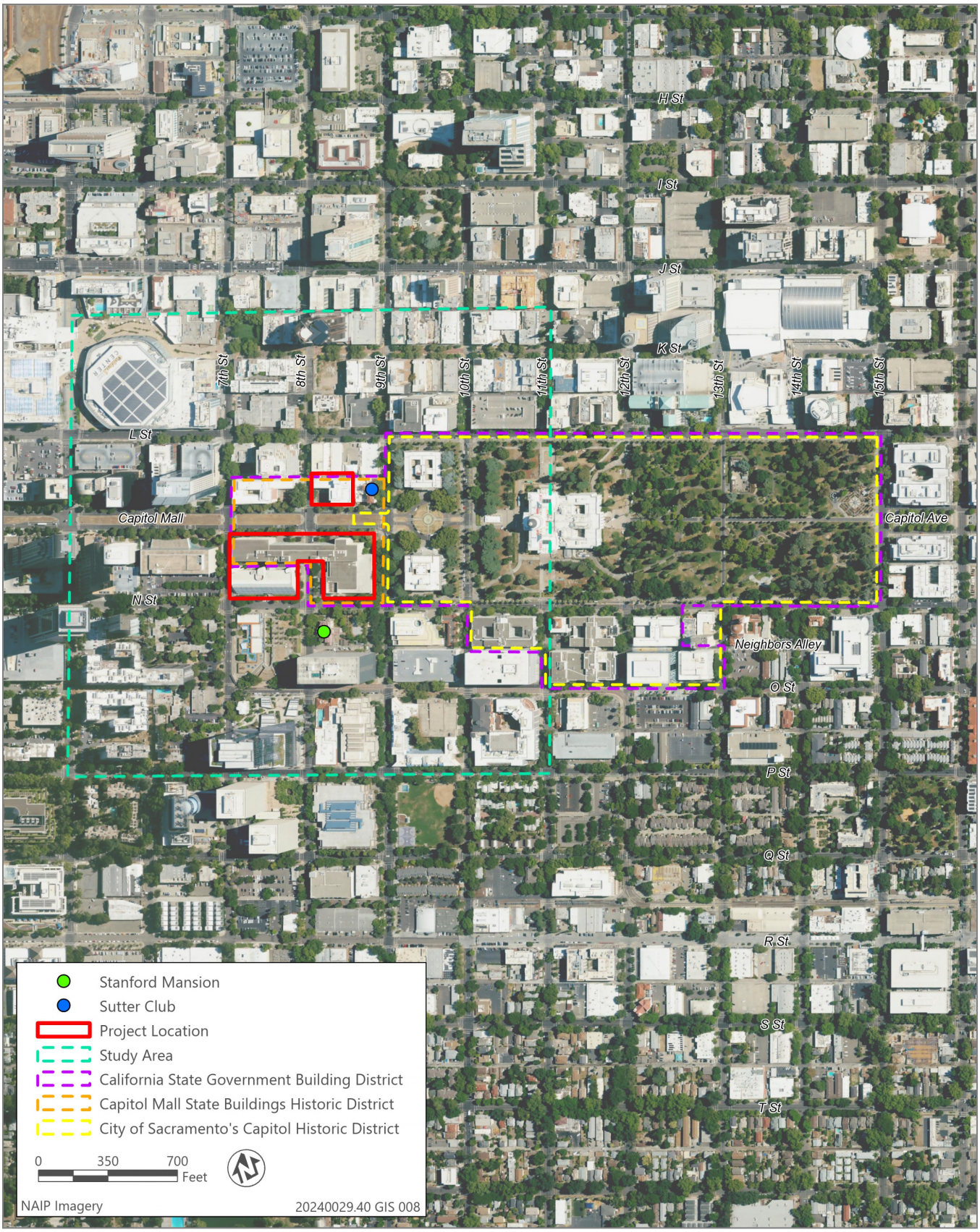
By 1960, the State occupied 23 publicly owned buildings (including annexes) and 19 leased buildings (including offices, special purpose buildings, and warehouses). The State owned nearly 70 acres in downtown Sacramento that included Capitol Park (40 acres), garages, parking lots, warehouses, and the Governor's Mansion on H Street between 15th and 16th streets (built in 1877 and now a State Historic Park). In 1960, the first California State Capitol Plan was created by the Capitol Building and Planning Commission. The physical plan focused on the area bounded by L, Q, 7th, and 17th streets and promoted the creation of seven superblocks, or pedestrian islands, by closing streets within the plan area to vehicular traffic and advocated purchasing land within the plan area before implementation began and property values increased. Policy changed in 1967 and cleared sites were used for surface parking lots, and leasing space from the private sector for State office needs became the dominant policy (Page & Turnbull n.d.).

RECORDS SEARCHES AND SURVEYS

On February 23, 2026, a records search of the study area was conducted at the North Central Information Center (NCIC), at California State University, Sacramento (Figure 4.13-1). A study area was established to include the project site and a buffer of approximately two city blocks around the project site to capture any property that could assist in the understanding of the history of the project location. The following information was reviewed as part of the records search:

- NRHP and CRHR,
- California Office of Historic Preservation Historic Property Directory,
- California Inventory of Historic Resources,
- California State Historic Landmarks, and
- California Points of Historical Interest.

A total of 58 reports have been recorded within the study area. A total of 123 previously recorded cultural resources were identified either entirely, or partially within the study area; this includes 19 archaeological sites, a multi-component historic district containing both precontact and historic-era materials, a tribal landscape, and 102 built features. The tribal landscape identified is discussed in Section 4.14, "Tribal Cultural Resources." There are no known unique archaeological resources or historical resources of an archaeological nature in the project site. The following includes brief descriptions of those built environment features that could be affected by the proposed project. There are three historic districts and two individual buildings that have been previously recorded and evaluated. A district is a geographically definable area with a significant concentration of historic buildings, structures, sites, or objects.



Source: adapted by Ascent in 2026.

Figure 4.13-1 Relevant Historical Resources in the Study Area

Built Environment

A built environment survey of the project site was conducted on May 27, 2026, which identified one additional built environment feature that had not been previously recorded or evaluated. Built environment features that could be adversely affected by the proposed project are described below.

As part of the survey the Employment Development Department (EDD) Solar Building Annex (751 N Street) was recorded and evaluated. The EDD Solar Building Annex is ineligible as a historical resource under CEQA and a summary of the evaluation is provided below (Ascent 2026). SHPO concurred with this evaluation on October 9, 2026 (CAGEN_2026_0811_001).

EDD Solar Building Annex

NRHP and CRHR criteria were used to evaluate the significance of the EDD Solar Building Annex. The NRHP criteria for eligibility are codified in 36 CFR Part 60 and explained in guidelines published by the Keeper of the NRHP. The NRHP and CRHR are discussed in more detail above in Section 4.13.1, "Regulatory Setting." Eligibility for listing on the NRHP and the CRHR rests on twin factors of significance and integrity. A resource must have both significance and integrity to be considered eligible. Loss of integrity, if sufficiently great, will become more important than the historical significance a resource may possess and render it ineligible. Likewise, a resource can have complete integrity, but if it lacks significance, it must also be considered ineligible.

The EDD Solar Building Annex does not appear to be eligible for listing in the NRHP or the CRHR or as a California Historical Landmark as it is not associated with events that have made a significant contribution to history (Criterion A/1), does not have any direct associations with any individuals significant to history (Criterion B/2), is without noteworthy architectural qualities (Criterion C/3), and is not likely to yield any additional important information about our history (Criterion D/4) (Ascent 2026). As a result, it is not considered a historical resource for the purposes of CEQA.

California State Government Building District (California State Office Building District) (P-34-003596)

The California State Office Building District is a historic district that includes 14 properties in downtown Sacramento: State Capitol Building (1303 10th Street), Capitol Park, State Insectary (1300 L Street), Library & Courts Building (914 Capitol Mall), Jesse M. Unruh Building (Office Building No. 1; 915 Capitol Mall), Motor Vehicles Building (Food & Agriculture Building), Public Works Building (Transportation Building), Business and Professions Building, Education Building (Rehabilitation Building; 1220 N Street), Personnel Building (State Personnel Building; 801 Capitol Mall), Employment Building (EDD Headquarters Building; 800 Capitol Mall), Veteran's Affairs Building (1227 O Street), Public Works Annex (Transportation Annex; 1121 O Street), and Agricultural Annex (Food & Agricultural Annex; (1215 O Street) (see Figure 4.13-1 for the district boundary). The district is eligible under Criteria A and C with a period of significance of 1874 to 1962 "for its association with the development and expansion of California state government from Statehood through the Post-World War II economy." It is listed on the NRHP, CRHR, and as a CHL. It was most recently recorded in 2017 and SHPO concurrence on the eligibility determination was obtained in 2018 (CAGEN_2017_0913_001).

Capitol Mall State Buildings Historic District

The Capitol Mall State Buildings Historic District includes three buildings and landscape/hardscape elements that formed an "intact and cohesive grouping of early 1950s state office buildings." The three buildings are the Education Building (721 Capitol Mall), the Personnel Building (801 Capitol Mall), and the EDD Headquarters Building (800 Capitol Mall) (see Figure 4.13-1 for the district boundary). The district was recommended eligible for the NRHP and as a CHL in 2017. The district was recommended eligible under NRHP Criterion A and CRHR Criterion 1 for its association with post-World War II era and expansion of state government and under NRHP Criterion C and CRHR Criterion 3 as an example of Late Moderne government building in accordance with the City Beautiful design principles. It was also recommended eligible as a CHL as an outstanding example of a mid-twentieth century City Beautiful-inspired group of state office buildings. SHPO concurrence on the eligibility determination was obtained on January 11, 2018 (CAGEN_2017_1003_001).

City of Sacramento's Capitol Historic District

The Capitol Historic District is locally listed on the Sacramento Register of Historic and Cultural Resources. The district includes 7 contributing properties; Jesse M. Unruh Building (State Office Building No. 1; 915 Capitol Mall), the State Capitol Building (1303 10th Street), Business and Professions Building (1020 N Street), The Lewis Apartments (1100 N Street), Public Works Building (1120 N Street), Motor Vehicles Building (1220 N Street), The Thayer Apartments (1228 N Street), Agricultural Annex (1215 O Street) (see Figure 4.13-1 for the district boundary). The period of significance is 1860 to 1957.

Sutter Club (P-34-003302)

The Sutter Club is a social club built in 1930 and located at 1220 9th Street (Figure 4.13-1). It was designed by the firms Dean & Dean and Starks & Flanders. It is an important example of the Spanish Eclectic architectural style and is Sacramento's oldest social club. It is listed on the NRHP (NRHP Reference #100000951), CRHR, and the Sacramento Register of Historic and Cultural Resources.

Stanford Mansion (P-34-002376/HRI-5813-0582-0000 and 5813-0960-0003)

The Stanford Mansion, also known as the Leland Stanford House or the Stanford-Lathrop Home, is located at 800 N Street (Figure 4.13-1). This resource includes the 1857 mansion, its associated brick stable, designed grounds, and a modern visitor center and museum store. It is notable as the only surviving building that is significantly associated with Leland Stanford's career. It is listed on the NRHP and CRHR.

4.13.3 Impacts and Mitigation Measures

METHODOLOGY

The impact analysis for archaeological and historical resources is based on the records search conducted at the NCIC. The analysis is also informed by the provisions and requirements of federal, state, and local laws and regulations that apply to cultural resources.

PRC Section 21083.2(g) defines a "unique archaeological resource" as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets one or more of the following CRHR-related criteria: (1) that it contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; (2) that it as a special and particular quality, such as being the oldest of its type or the best available example of its type; or (3) that it is directly associated with a scientifically recognized important prehistoric or historic event or person. An impact on a resource that is not unique is not a significant environmental impact under CEQA (State CEQA Guidelines Section 15064.5[c][4]). If an archaeological resource qualifies as a resource under CRHR criteria, then the resource is treated as a unique archaeological resource for the purposes of CEQA.

In addition, according to PRC Section 15126.4(b)(1), if a project adheres to the Secretary of the Interior's Standards for the Treatment of Historic Properties, "the project's impact on the historical resource shall generally be considered mitigated below a level of significance and thus is not significant."

For the purposes of the impact discussion, "historical resource" is used to describe built-environment historic-period resources. Archaeological resources (both precontact and historic-period), which may qualify as "historical resources" pursuant to CEQA, are analyzed separately from built-environment historical resources.

THRESHOLDS OF SIGNIFICANCE

A cultural resources impact is considered significant if implementation of the Capitol Mall Office Buildings Demolition Project would do any of the following:

- cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 of the State CEQA Guidelines;
- cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the State CEQA Guidelines; or
- disturb any human remains, including those interred outside of formal cemeteries.

ISSUES NOT DISCUSSED FURTHER

All potential cultural resources issues identified in the significance criteria are evaluated below.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 4.13-1: Cause a Substantial Adverse Change in the Significance of a Historical Resource

Five historical resources are located within or immediately adjacent to the project site. Implementation of the project would result in the physical alteration of historical built resources that could result in a substantial adverse change in the significance of historical resources. This is a **potentially significant** impact.

The proposed project includes the demolition of three state-owned buildings in downtown Sacramento. Two of the buildings, the EDD Headquarters Building at 800 Capitol Mall and the State Personnel Board Building at 801 Capitol Mall, are not individually eligible for listing in the NRHP or CRHR; however, they are contributors to the California State Government Building District and the Capitol Mall State Building District historic districts, which are historical resources under CEQA. Additionally, the Sutter Club, the Leland Stanford Mansion, and the City of Sacramento Capitol Historic District are adjacent to the project site and are also eligible historical resources under CEQA. Damage to or destruction of a building, structure, or district that is a designated historic resource or is recommended eligible for listing as a historic resource could result in a substantial adverse change in its historical significance. In addition, demolition- and construction-related groundborne vibration could result in damage to historical resources.

Demolition

California State Government Building District (California State Office Building District) (P-34-003596)
The proposed project would demolish the EDD Headquarters at 800 Capitol Mall and the State Personnel Board Building at 801 Capitol Mall, which are two of the 14 contributors to the California State Government Building District. None of the other buildings within the district would be at risk of damage from groundborne vibration generated by demolition activities (see Section 4.9, "Noise and Vibration," and in particular the discussion of Impact 4.9-2, "Short-Term Demolition- and Construction-Related Vibration Levels"). Although the historic district would remain eligible for listing in the NRHP, CRHR, and as a CHL, the demolition of these two buildings would result in a substantial adverse physical change in the significance of the California State Government Building District; therefore, the proposed project would result in a significant impact on this historical resource per CEQA Guidelines 15064.5(b)(1).

Capitol Mall State Buildings Historic District
The proposed project includes the demolition of two of the three buildings that contribute to the Capitol Mall State Buildings Historic District. The Personnel Building (801 Capitol Mall) and the EDD Headquarters (800 Capitol Mall) would be demolished and only the Education Building (721 Capitol Mall) would remain. The Education Building would not be at risk of damage from groundborne vibration generated by demolition activities (see Section 4.9, "Noise and Vibration," and in particular the discussion of Impact 4.9-2, "Short-Term Demolition- and Construction-Related Vibration Levels"). The demolition of these two buildings would result in a substantial adverse physical change in the

significance of the Capitol Mall State Buildings Historic District and it would no longer be eligible as a historic district, as a single building is not considered a district. Therefore, the proposed project would result in a significant impact on this historical resource per CEQA Guidelines 15064.5(b)(1).

City of Sacramento's Capitol Historic District

The project does not propose any direct physical changes to the Capitol Historic District. Project activities would be near this historic district, with the nearest contributing features, landscape elements, approximately 30 feet away (a portion of the lawn in the Capitol Mall median as shown in figure 4.13-1). Therefore, the project would not result in substantial adverse physical change to any of the district's contributors as a result of project-related physical demolition, destruction, relocation, or alteration per CEQA Guidelines 15064.5(b)(1). None of the buildings within the district would be at risk of damage from groundborne vibration generated by demolition activities (see Section 4.9, "Noise and Vibration," and in particular the discussion of Impact 4.9-2, "Short-Term Demolition- and Construction-Related Vibration Levels"). Although the landscape elements of the historic district within 30 feet of the project site (i.e., a small portion of the Capitol Mall median lawn) are close enough to be exposed to groundborne vibration generated by demolition activities, this landscape element would not be susceptible to damage from groundborne vibration. Therefore, the project would not cause a substantial adverse change to the immediate surroundings or physical characteristics that convey the significance of the Capitol Historic District.

Sutter Club (P-34-003302)

The Sutter Club is adjacent to the State Personnel Board Building with just a few inches separating the buildings. Demolition of the State Personnel Board Building has the potential to cause physical damage to the Sutter Club both from the vibrations from demolition activities at the State Personnel Board Building (see Section 4.9, "Noise and Vibration," and in particular the discussion of Impact 4.9-2, "Short-Term Demolition- and Construction-Related Vibration Levels") and from the subsequent debris. Due to this potential for incidental damage resulting from demolition activities, the Sutter Club (1220 9th Street) would be subject to risk of substantial adverse change to its significance as a result of project-related physical demolition of the adjacent building per CEQA Guidelines 15064.5(b)(1). Therefore, the project has the potential to cause a significant impact on the Sutter Club.

Leland Stanford Mansion (P-34-002376)

The Leland Stanford Mansion is located within an approximate 0.9-acre property cattycorner to the project site on the opposite side of the intersection of N and 8th streets. The project does not propose any work directly on the Leland Standford Mansion property. The mansion and its associated brick stable, both originally constructed in the 1850s, are the primary historical resources of the Leland Stanford Mansion State Historic Park. The closest feature of the resource, the mansion itself, is over 150 feet from the closest portion of the project site and is too distant from the project site for groundborne vibrations generated by demolition activities to do physical damage to the mansion or associated facilities (see Section 4.9, "Noise and Vibration," and in particular the discussion of Impact 4.9-2, "Short-Term Demolition- and Construction-Related Vibration Levels"). Therefore, the Leland Stanford Mansion would not be subject to risk of substantial adverse change to its significance as a result of project-related physical demolition, destruction, relocation, or alteration of the resources per CEQA Guidelines 15064.5(b)(1).

Future Development

Future development of the project site includes a mix of land uses that would comprise approximately 3,630,000 gross square feet at full buildout. The use of heavy equipment for construction of these facilities has the potential to generate groundborne vibration that extends off the project site, similar to what would be generated by demolition activities. However, as described in the discussion of Impact 4.9-2, "Short-Term Demolition- and Construction-Related Vibration Levels" in Section 4.9, "Noise and Vibration," a "vibratory roller" would be a piece of equipment typically used for construction of new buildings that would not be used for demolition. A vibratory roller generates more groundborne vibration than any equipment used for demolition; therefore, levels of groundborne vibration generated by construction would be somewhat higher than those generated by demolition. However, even with this higher level of groundborne, the Sutter Club would remain the only historical resource that could potentially be damaged by groundborne vibration generated during project construction.

Future development could affect the California State Government Building District, the Capitol Historic District, the Sutter Club, and the Leland Stanford Mansion if new structures are visually incompatible with these historic resources or substantially alter the visual character of a designated historic structure or district. Because the Capitol Mall State Buildings Historic District would no longer exist following demolition as stated earlier, the issue of visual compatibility of future development with this district would be moot.

While site design and building construction materials of future development are currently unknown, future development would use designs and materials consistent with those used for similar high-quality contemporary buildings in the vicinity to create consistency within the area. Future development would retain the general character of office buildings in downtown Sacramento near the State Capitol. In addition, future development would comply with height restrictions of the Capitol View Protection Act; as well as objectives in the City's Central City Urban Design guidelines to the greatest degree possible. While specific plans have not been developed for future development, the land use types being considered for the project would be consistent with the existing surrounding uses and setting of the downtown Sacramento area and the Capitol Mall corridor. Therefore, future development would not have an indirect impact on historical resources.

Nevertheless, vibration concerns related to future construction adjacent to the Sutter Club would have the potential to cause a significant impact on the historical resource.

Conclusion

CEQA Guidelines [CCR 15126.4(b)(2)] note that in some circumstances, documentation of an historical resource will not mitigate the effects of demolition of that resource to a less-than-significant level because the historic resources would no longer exist. Demolition would result in a significant impact on the California State Government Building District and Capitol Mall State Buildings Historic District. Falling debris and groundborne vibration generated during demolition of the State Personnel Board building has the potential to cause damage to, and a significant impact on the Sutter Club. Future development on the State Personnel Board building could result in a similar groundborne vibration induced impact to the Sutter Club. These impacts would be **potentially significant**.

Mitigation Measures

Mitigation Measure 4.13-1a: Update California State Government Building District Documentation

This measure applies to the California State Government Building District.

DGS shall update the district boundaries and documentation, including a district record, to reflect current conditions post demolition of the EDD and State Personnel buildings. This documentation shall include individual eligibility of each building. In addition, the documentation shall include an update of the historic context, including master plans/policy changes that have guided development within the last 15 years.

Mitigation Measure 4.13-1b: Prepare Archival Recordation Documentation for the Capitol Mall State Buildings Historic District

This measure applies to the Capitol Mall State Buildings Historic District.

DGS shall ensure that prior to any building alteration or demolition activities, both the EDD Headquarters (800 Capitol Mall) and the State Personnel (801 Capitol Mall) buildings shall be the subject of recordation by photography and written historical data following the standards of the Historic American Buildings Survey (HABS). HABS Level II documentation shall be implemented, which includes large-format archival photographs and written data and shall include historic plans of the building and associated landscape features. Archival photographs shall include up to 30 views of each building including contextual views of the buildings within their setting, along with exterior, interior, and detail views of character-defining features. The HABS documentation shall be completed by a qualified professional who meets the standards for History or Architectural History set forth by the Secretary of the Interior's Professional Qualification Standards (36 CFR, Part 61). The draft documentation shall be submitted for review and approval by DGS. The final documentation shall be distributed or offered to the SHPO, DGS, and the appropriate interested parties, which may include, but is not limited to historical organizations. Additionally, a DPR 523 Update

form shall be prepared and filed with the NCIC, post demolition, stating the date that the two buildings were demolished and that the Capitol Mall State Buildings Historic District is no longer eligible as a district.

Mitigation Measure 4.13-1c: Prepare Existing Conditions Memo

This measure applies to the Sutter Club. Prior to the commencement of any demolition or demolition related activities of the State Personnel Building, DGS shall have a qualified architectural historian or historic architect (meeting the appropriate Secretary of Interior's Professional Qualification Standards) prepare an Existing Conditions Memo that documents the existing physical conditions of the character-defining features of the Sutter Club. This memo will be used at the conclusion of demolition activities to determine what damage, if any, was caused by the project to facilitate the completion of Mitigation Measure 4.13-1f. The same measure would be implemented by the entity redeveloping the project site (e.g., Sacramento State) and their construction contractor(s) prior to implementation of building construction activities on the former site of the State Personnel Board building.

Mitigation Measure 4.13-1d: Implement Physical Protection and Measures for the Sutter Club

This measure applies only to activities on the State Personnel Building site adjacent to the Sutter Club.

DGS shall establish physical protection and measures for the Sutter Club prior to the commencement of demolition activities at the State Personnel Building site. The entity redeveloping the site (e.g., Sacramento State) shall do the same prior to initiating redevelopment activities on the former site of the State Personnel Board Building. The protection measures shall ensure that impacts on this historical resource will be minimized and/or avoided to the extent possible. To avoid inadvertent damage from materials or debris falling and damaging the Sutter Club during project demolition and construction, contractors shall implement protection methods, such as scaffolding and/or movable metal nets held by cranes that are moved into place as necessary to prevent debris and materials falling onto the Sutter Club. Physical barriers shall also be placed to protect the Sutter Club from demolition or construction vehicles, equipment, and activities, including concrete barriers and/or use of screens and netting, to avoid inadvertent damage to the historic building or a feature of the historic landscape. If permitted by the Sutter Club, windows of the Sutter Club potentially subject to damage shall be temporarily covered (e.g., protective blanketing, plywood, or other material) to prevent damage. Protective barriers shall be installed prior to demolition or construction activities, and shall remain in place through the end of demolition or construction activities, or until the protected feature is no longer at risk (e.g., temporary window coverings need not be retained if no activities that might damage windows are occurring). A qualified historic architect shall monitor implementation of these protection measures to support proper implementation by the demolition and construction contractors and ensure protection of the Sutter Club.

Mitigation Measure 4.13-1e: Implement Mitigation Measures 4.9-2a and 4.9-2b

This measure applies only to activities on the State Personnel Building site adjacent to the Sutter Club.

Mitigation Measure 4.9-2a requires minimizing the generation of groundborne vibration near the Sutter Club, monitoring of vibration levels to determine if vibration thresholds are exceeded, and implementation of additional actions to minimize vibration if thresholds are exceeded.

Mitigation Measure 4.9-2b requires the collection of data on pre-demolition/pre-construction building conditions at the Sutter Club to act as a baseline to assess whether project activities have resulted in damage. Any damage caused by project activities would be prepared. A licensed structural or geotechnical engineer would be involved with the implementation of various aspects of Mitigation Measures 4.9-2a and 4.9-2b, including preparation of a vibration monitoring.

Mitigation Measure 4.13-1f: Include a Qualified Architectural Historian or Historic Architect in Sutter Club Protection Measures

A qualified architectural historian or historic architect (meeting the appropriate Secretary of Interior's Professional Qualification Standards) will be included in the team implementing Mitigation Measures 4.9-2a and 4.9-2b and will work with DGS (for demolition), the entity implementing redevelopment (e.g., Sacramento State), and the licensed structural or geotechnical engineer, to incorporate protection of character-defining features of the Sutter Club into the vibration control planning.

Mitigation Measure 4.13-1g: Repair Inadvertent Damage

This measure applies to the Sutter Club and would be integrated with Mitigation Measure 4.9-2b calling for collection of baseline data on the condition of the Sutter Club and repairs of inadvertent damage caused by project activities.

The Existing Conditions Memo identified in Mitigation Measure 4.13-1c and existing condition data collected as part of Mitigation Measure 4.9-2b shall be used to determine if project-related demolition or construction activities resulted in inadvertent damage to character-defining features of the Sutter Club. DGS (for demolition) or the entity implementing construction, shall repair any character-defining features of the Sutter Club that were damaged as a result of implementing their component of the proposed project in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties. Inadvertent damage is any damage that results in a significant impact to a historical resource within the meaning of CEQA Guidelines Section 15064.5(b)(2) or adverse effects to historic properties within the meaning of 36 C.F.R. Part 800.5(a)(1). All repairs to character-defining features shall be reviewed and approved by a qualified historic architect (meeting the appropriate Secretary of Interior's Professional Qualification Standards) prior to determining that the repair has been adequately implemented. A memo shall be prepared by the qualified architectural historian or historic architect documenting that the repairs were completed in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties.

Significance after Mitigation

Implementation of Mitigation Measure 4.13-1a would reduce impacts on the California State Government Building District, and implementation of Mitigation Measure 4.13-1b would reduce impacts on the Capitol Mall State Buildings Historic District. However, impacts to both resources would remain significant and unavoidable because demolition would result in the permanent loss of historical resources that cannot be replaced.

Implementation of Mitigation Measure 4.13-1c through 4.13-1g would reduce potential impacts on the Sutter Club by requiring the installation and use of protective barriers during demolition and construction activities to prevent falling debris or materials from damaging the historic resource; requiring monitoring and controlling vibration to prevent structural damage; and by requiring repair of any inadvertent damage, including any damage to character defining features according to Secretary of the Interior's Standards for the Treatment of Historic Properties. Implementation of these mitigation measures would reduce the project's impact on the historic Sutter Club to a less-than-significant level.

Because the project would result in the permanent loss of the Capitol Mall State Buildings Historic District and the potential loss of additional historical resources or substantial impairment of their integrity, these impacts would remain **significant and unavoidable**.

Impact 4.13-2: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources

There are no known unique archaeological resources in or immediately adjacent to the project site. Future demolition and redevelopment related ground-disturbing activities could result in discovery or damage of yet undiscovered unique archaeological resources as defined in State CEQA Guidelines Section 15064.5. This would be a **potentially significant** impact.

A total of 19 previously recorded archaeological sites were identified within the study area; 18 of these sites are historic-era archaeological sites while one is a precontact site. The NCIC search also identified one multi-component historic district, containing both precontact and historic-era materials. There are no known unique archaeological

resources or historical resources of an archaeological nature on the project site or the immediate vicinity. In addition, recent projects immediately adjacent to the project site have not revealed any intact archaeological sites or significant archaeological materials.

Demolition

The project would include demolition of three existing buildings. The concrete slabs of these buildings may be left in place, with no excavation of footings or other subsurface disturbance. There may be some isolated utility capping for safety purposes or utility relocations to maintain service to facilities outside the project site; however, this activity would generate minor ground disturbance in areas that had been previously excavated during the initial utility placement. It is unlikely that these activities would encounter any intact archaeological sites or significant archaeological materials.

Future Development

Future development could include excavations, trenching, and other ground-disturbing activities that could result in damage to previously unknown archaeological resources.

Conclusion

The minor, isolated ground disturbance associated with demolition is unlikely to encounter intact archaeological deposits and would have a less-than-significant impact to archaeological resources. However, the ground-disturbing activities associated with future development could result in damage to unknown archaeological resources. Therefore, the project could result in a **potentially significant** impact for future development.

Mitigation Measures

Mitigation Measure 4.13-2: Halt Ground Disturbance Upon Discovery of Subsurface Archaeological Features

In the event that any precontact or historic-period subsurface archaeological features or deposits, including locally darkened soil ("midden"), that could conceal cultural deposits, are discovered during excavations, all ground-disturbing activity within 100 feet of the resources shall be halted and a qualified professional archaeologist shall be retained to assess the significance of the find. If the qualified archaeologist determines the archaeological material to be Native American in nature, the entity implementing redevelopment (e.g., Sacramento State) shall contact the appropriate Native American tribe for their input on the preferred treatment of the find. If the find is determined to be significant by the archaeologist (i.e., because it is determined to constitute a unique archaeological resource), the archaeologist shall develop, and the entity implementing redevelopment shall implement appropriate procedures to protect the integrity of the resource and ensure that no additional resources are affected. Procedures could include but would not necessarily be limited to preservation in place (which shall be the preferred manner of mitigating impacts to archaeological sites), archival research, subsurface testing, or contiguous block unit excavation and data recovery (when it is the only feasible mitigation, and pursuant to a data recovery plan).

Significance after Mitigation

Implementation of Mitigation Measure 4.13-2 would reduce impacts associated with historic-period archaeological resources to a **less-than-significant** level by requiring the performance of professionally accepted and legally compliant procedures in the event of a discovery, as well as the protection of any previously undocumented significant historic-period archaeological resources.

Impact 4.13-3: Disturb Human Remains

Based on documentary research, no evidence suggests that any precontact or historic-period marked or un-marked human interments are present within or in the immediate vicinity of the project site. However, ground-disturbing construction activities could uncover previously unknown human remains. Compliance with California Health and Safety Code Section 7050.5 and PRC Section 5097 would make this impact **less than significant**.

Based on documentary research, no evidence suggests that any precontact or historic-period marked or un-marked human interments are present within or in the immediate vicinity of the project site. However, the location of grave sites and Native American remains can occur outside of identified cemeteries or burial sites. Therefore, there is a possibility that unmarked, previously unknown Native American or other graves could be present within the project site and could be uncovered by project-related construction activities.

California law recognizes the need to protect Native American human burials, skeletal remains, and items associated with Native American burials from vandalism and inadvertent destruction. The procedures for the treatment of Native American human remains are contained in California Health and Safety Code Section 7050.5 and PRC Section 5097.

These statutes require that, if human remains are discovered, potentially damaging ground-disturbing activities in the area of the remains shall be halted immediately, and the appropriate County coroner shall be notified immediately. If the remains are determined by the coroner to be Native American, NAHC shall be notified within 24 hours and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. Following the coroner's findings, the NAHC-designated Most Likely Descendant, and the landowner shall determine the ultimate treatment and disposition of the remains and take appropriate steps to ensure that additional human interments, if present, are not disturbed. The responsibilities for acting upon notification of a discovery of Native American human remains are identified in PRC Section 5097.94.

Compliance with California Health and Safety Code Section 7050.5 and PRC Section 5097 during all project activities would provide an opportunity to avoid or minimize the disturbance of human remains, and to appropriately treat any remains that are discovered. Therefore, this impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

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4.14 TRIBAL CULTURAL RESOURCES

This section analyzes and evaluates the potential impacts of the project on known and unknown (undiscovered or unidentified) Tribal cultural resources. Tribal cultural resources, as defined by Assembly Bill (AB) 52, Statutes of 2014, in Public Resources Code (PRC) Section 21074, are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a Tribe. A Tribal cultural landscape is defined as a geographic area (including both cultural and natural resources and the wildlife therein) associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values.

No comment letters regarding Tribal cultural resources were received in response to the Notice of Preparation (see Appendix A).

4.14.1 Regulatory Setting

FEDERAL

There are no federal regulations that apply to this evaluation of Tribal cultural resources.

STATE

Public Resources Code Section 21080.3

AB 52, signed by the California Governor in September of 2014, established a new class of resources under CEQA: "tribal cultural resources," defined in PRC Section 21074. Pursuant to PRC Sections 21080.3.1, 21080.3.2, and 21082.3, lead agencies undertaking CEQA review must, upon written request of a California Native American Tribe, begin consultation before the release of an EIR, negative declaration, or mitigated negative declaration. CEQA Sections 21080.3.1 and 21080.3.2 state that within 14 days of determining that a project application is complete, or to undertake a project, the lead agency must provide formal notification, in writing, to the tribes that have requested notification of proposed projects in the lead agency's jurisdiction. If it wishes to engage in consultation on the project, the tribe must respond to the lead agency within 30 days of receipt of the formal notification. The lead agency must begin the consultation process with the tribes that have requested consultation within 30 days of receiving the request for consultation. Consultation concludes when either: 1) the parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource, or 2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.

California Environmental Quality Act

AB 52, signed by the California Governor in September of 2014, established a new class of resources under CEQA: "[T]ribal cultural resources," defined in PRC Section 21074. AB 52 is implemented through CEQA as described below. CEQA requires public agencies to consider the effects of their actions on "[T]ribal cultural resources." PRC Section 21084.2 establishes that "[a] project with an effect that may cause a substantial adverse change in the significance of a [T]ribal cultural resource is a project that may have a significant effect on the environment." PRC Section 21074 states:

a) "Tribal cultural resources" are either of the following:

    1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are either of the following:

        A) Included or determined to be eligible for inclusion in the CRHR.

        B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

    2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in

subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American Tribe.

b) A cultural landscape that meets the criteria of subdivision (a) is a Tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "nonunique archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a Tribal cultural resource if it conforms with the criteria of subdivision (a).

Pursuant to CEQA requirements, lead agencies undertaking CEQA review must, upon written request of a California Native American Tribe, begin consultation before the release of an EIR, negative declaration, or mitigated negative declaration.

California Register of Historical Resources

All properties in California that are listed in or formally determined eligible for listing in the National Register of Historic Places (NRHP) are also listed in the California Register of Historical Resources (CRHR). The CRHR is a listing of State of California resources that are significant in the context of California's history. It is a Statewide program with a scope and with criteria for inclusion similar to those used for the NRHP. In addition, properties designated under municipal or county ordinances are also eligible for listing in the CRHR.

A historical resource must be significant at the local, State, or national level under one or more of the criteria defined in the California Code of Regulations Title 15, Chapter 11.5, Section 4850 to be included in the CRHR. The CRHR criteria are tied to CEQA because any resource that meets the criteria below is considered a significant historical resource under CEQA. As noted above, all resources listed in or formally determined eligible for listing in the NRHP are automatically listed in the CRHR.

The CRHR uses four evaluation criteria:

Criterion 1. Is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.

Criterion 2. Is associated with the lives of persons important to local, California, or national history.

Criterion 3. Embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of a master; or possesses high artistic values.

Criterion 4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

Similar to the NRHP, a historical resource must meet one of the above criteria and retain integrity to be listed in the CRHR. The CRHR uses the same seven aspects of integrity used by the NRHP: location, design, setting, materials, workmanship, feeling, and associations.

Health and Safety Code, Section 7050.5

Section 7050.5 of the Health and Safety Code requires that construction or excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If they are determined to be those of a Native American, the coroner must contact NAHC.

California Native American Historical, Cultural, and Sacred Sites Act

The California Native American Historical, Cultural, and Sacred Sites Act (PRC Section 5097.9) applies to both State and private lands. The act requires, upon discovery of human remains, that construction or excavation activity cease and that the county coroner be notified. If the remains are those of a Native American, the coroner must notify the NAHC, which notifies (and has the authority to designate) the most likely descendants (MLD) of the deceased. The act stipulates the procedures the descendants may follow for treating or disposing of the remains and associated grave goods.

Public Resource Code Section 5097

PRC Section 5097 specifies the procedures to be followed in the event of the unexpected discovery of human remains on nonfederal land. The disposition of Native American human burials falls within the jurisdiction of the NAHC. Section 5097.5 of the Code states the following:

> No person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor.

LOCAL

The buildings on the project site are located on State-owned property and would be demolished by the Department of General Services (DGS) and subsequent development is presumed to be undertaken by the California State University, Sacramento (Sacramento State), another State agency. As explained in Section 4.2, "Land Use and Planning," of this Draft EIR, under Section 4.2.1, "Local," state agencies are not subject to local plans, policies, and zoning regulations. Nevertheless, in the exercise of its discretion, DGS does reference, describe, and address local plans, policies, and regulations that are applicable to the project. This evaluation is also intended to be used by local agencies for determining, as part of their permit processes, the project's consistency with local plans, policies, and regulations.

City of Sacramento 2035 General Plan

The following policies are considered relevant to the project and Tribal cultural resources in the vicinity of the project:

- Policy HCR 2.1.3: Consultation. The City shall consult with appropriate organizations and individuals (e.g., California Historical Resources Information System (CHRIS) Information Centers, the Native American Heritage Commission (NAHC), the CA Office of Planning and Research (OPR) "Tribal Consultation Guidelines," etc.,) and shall establish a public outreach policy to minimize potential impacts to historic and cultural resources.

4.14.2 Environmental Setting

The project site is located near the border of Valley Nisenan and Plains Miwok territory. The following is a summary of Valley Nisenan and Plains Miwok.

VALLEY NISENAN

Nisenan territory included the drainages of the Bear, American, Yuba, and southern Feather rivers. Traditional Nisenan territory extended to the crest of the Sierra Nevada, but Valley Nisenan generally did not range beyond the valley and lower foothills. Their permanent settlements were generally located on ridges separating parallel streams, either on crests, knolls, or terraces, part way up these ridges (Wilson and Towne 1978).

Nisenan territory offered abundant year-round food sources. Food gathering was based on seasonal ripening, but hunting, gathering, and fishing went on all year, with the greatest activity in late summer and early fall. They gathered many different staples, not depending on one crop. Seasonal harvests were gathered for both communal and personal family use. Most activities and social behaviors such as status, sharing, trading, ceremonies, and disagreements were important adjuncts to the gathering and distribution of food. Extended families or whole villages of Nisenan would gather acorns. Men would hunt while women and children gathered the acorns knocked from the trees. Buckeye nuts, sugar and pine nuts, and hazelnuts were also gathered. Acorns were cracked on an acorn anvil and shelled. They were then ground into flour using a bedrock mortar (grinding rock) and a soaproot brush to control scattering of the resulting flour. The flour was leached to remove the tannin then cooked in watertight baskets. Cooking was done with fire-heated stones that were lifted with two sticks, dipped in water to clean them, and then dropped into the cooking basket. Enough soup and mush were usually prepared to last several days (UAIC 2025a).

Roots were dug with a digging stick in the spring and summer and were eaten raw, steamed, baked, or dried and pounded in mortars and pressed into cakes to be stored for winter use. Wild onion (*chan*), sweet potato (*sí kum*), and "Indian potato" (*dúbus*) were the most desired. Wild carrot (*ba*) was used as medicine while wild garlic was used to wash the head and body. Grasses, herbs, and rushes provided food and material for clothing and baskets. Clover (*Trifolium willdenovii*) was an important food for Nisenan people as it was the first fresh herb available after winter and its emergence set the timing of the Nisenan spring flower dance. Seeds were gathered using a seed beater and tray. They were then parched, steamed, dried, or made into mush. Many varieties of wild plums, native berries, grapes, and other native fruits were eaten. Manzanita berries were often traded or made into a cider-like drink.

Deer drives were common, with several villages participating and the best marksman doing the killing. The animals were often driven into a circle of fire then killed. Deer were also hunted using deadfalls, snares, and deerskin and antler decoys. Sometimes they were run down on soft ground or snow. Antelope were taken by surround, drives, and flag decoys while elk were usually killed along waterways on soft ground. The bear hunt was very ceremonial. Black bears were usually hunted in the winter. Lighted brands were often used to drive them from their dens. Grizzlies that lived on the valley floor were greatly feared and rarely hunted. Bobcats and California mountain lions were hunted for food and their skins. Rabbits and other small game were killed with blunted arrows and sticks. Traps, nets, snares, fire, and rodent hooks were also used. In the foothills and valley, nets were made into a fence where driven rabbits were entangled and clubbed. Drives generally took place in the late spring. The man in charge of the drive divided the catch. Other small animals were often caught and killed, with the exception of the coyote. Game meat was baked, roasted, or dried.

Weirs, traps, harpoons, nets, and gorge hooks, as well as tule balsas and log canoes were used in fishing. Fish were poisoned using turkey mullein and soaproot or driven into shallow water and caught by hand. Freshwater mussels were obtained in the larger rivers. On the lower courses, sturgeon and salmon were netted and speared. Whitefish, suckers, and trout were caught at higher elevations. Waterfalls were used as eel (freshwater lamprey) fishing stations; Salmon Falls, on the south fork of the American River, was one such location. Birds were taken with nets, arrows, snares, traps, and nooses. Owls, vultures, and condors were not killed. Bird skins and feathers were used for regalia, clothing, and decoration. Salt was acquired from springs near Lincoln, Cool, and Latrobe. It was also acquired from a plant with cabbage-like leaves gathered in the summer (UAIC 2025a; Wilson and Towne 1978).

PLAINS MIWOK

The Plains Miwok are part of the larger Eastern Miwok group that forms one of the two major divisions of the Miwokan subgroup of the Utian speakers. The Plains Miwok lived in the Sacramento Valley along the Sacramento, Cosumnes, and Mokelumne rivers. They built their homes on high ground, with major villages concentrated along the major waterways. Conical homes were constructed with poles and thatching of brush, grass, or tule, though semisubterranean earth-covered homes were built as well. Major villages contained an assembly house, which was a semisubterranean structure with a diameter of 40 to 50 feet, as well as a sweathouse, which was a scaled-down version of the assembly house. Plains Miwok people utilized the rich resources of the delta and surrounding area for both dietary needs and material culture. Tules were woven into matting and clothing, bundled to form canoes, and used in house and granary construction. Salt, nuts, basketry, and obsidian were obtained through trade with neighboring tribes to the east. Shells, basketry, and bows were obtained, in turn, through trade with tribes located to the west (Levy 1978).

The Plains Miwok gathered food resources as the seasons varied. As with most California tribes, they subsided heavily on the acorn, but also gathered nuts, seeds, roots, greens, berries, and mushrooms. Animal foods included tule elk, pronghorn antelope, jackrabbits, squirrels, beaver, quail, and waterfowl. Salmon was the dominant animal food resource, ranking above other river resources, such as sturgeon. Technological items of the Plains Miwok included wooden digging sticks, poles, and baskets used for gathering vegetal resources, and stone mortars, pestles, and cooking stones used for processing. Items used for obtaining animal resources included nets, snares, seines, bows, and arrows. Arrow points were made primarily of basalt and obsidian.

The Native American population in the Sacramento Valley first came into contact with Spanish explorers in the late 1700s as the Franciscan missions sought converts. Plains Miwok converts were sent to Mission San José in the early 1800s. Many labored in large ranchos awarded during the Mexican period.

During two epidemics, in 1830 and 1837, foreign diseases decimated the populations of indigenous people in the Sacramento Valley. The discovery of gold in 1848 and the ensuing Gold Rush also contributed to substantial population declines. Between 1805 and 1856, the Miwok population declined from nearly 20,000 to approximately 3,000. Surviving Miwok labored for the growing mining, ranching, farming, and lumber industries (Levy 1978).

KNOWN ETHNOGRAPHIC VILLAGES NEAR PROJECT SITE

Villages along the Sacramento and American rivers include *Pujune*, *Momol*, *Sahmah*, *Demba*, *Yamahepu*, and *Sa'cum*. *Pujune* is located on the north side of the American River, about one-quarter mile east of its confluence with the Sacramento River. *Momol* is located on the south side of the American River, opposite the village of *Pujune*. *Sahmah* is located the east side of the Sacramento River, south of its confluence with the American River. *Demba* is located on the southwest side of the Sacramento River about one-half mile east of the Interstate 80 bridge crossing over the river. *Yamahepu* is located on the north side of the American River near the Highway 160 bridge crossing over the river. *Sa'cum* is located at Cesar Chavez Park in Sacramento.

In addition, Tribes have identified lake *Wanoho Pakan* as culturally important. A lake, originally named *Wanoho Pakan* by Native American Tribes, formerly extended from 3rd Street to 5th Street and north of I Street; the area is now occupied by the Southern Pacific railroad depot. *Wanoho Pakan* was and continues to be a place of cultural significance and value to Tribes. Subsequent to Euroamerican settlement and development of Sacramento, *Wanoho Pakan* became known as Sutter Lake and later as China Slough (JCC 2020:4.4).

The presence and distribution of the six villages and *Wanoho Pakan* indicate that the area encompassed by modern Sacramento was a landscape occupied and successfully used by Native Americans. Indeed, beyond any physical presence (e.g., archaeological sites and artifacts) of Native American occupation, the landscape is part of the history of Native Americans in the Sacramento area. The development and change of the landscape over time tells a story important to and valued by the Native American community and also the history of Sacramento and the Central Valley (JCC 2020:6.5,6.7).

CONTEMPORARY NATIVE AMERICAN SETTING

Defining Tribal cultural resources involves the knowledge and expertise of living California Native Americans. As the embodiment of a continuous connection between tribal history and the landscape, they are uniquely qualified to act as the interpreters and stewards of their culture, including the ability to define the significance of the material remains and landscapes of their ancestor's lifeways. Today, many descendants of Valley Nisenan and Plains Miwok still reside on lands once inhabited by their ancestors or on lands set aside for tribal communities by the federal government, which may or may not have been traditionally inhabited by their ancestors.

Contemporary Californian Native American tribes with ancestral connections to the study area and to the Valley Nisenan and Plains Miwok heritage include the United Auburn Indian Community (UAIC), Shingle Springs Band of Miwok Indians (SSBMI), Ione Band of Miwok, and Wilton Rancheria. These tribes today maintain connection to their history and culture in a multitude of ways, including through ceremony, language and traditional knowledge instruction, community service, and tribal governance. For example, a "Big Time" is typically celebrated every September to mark the start of autumn and acorn gathering time at Chaw'se Grinding Rock State Park in Pine Grove. This celebration includes serving traditional foods, traditional dancing, healing rituals, and worship in the roundhouse. Language and traditional skill classes are offered by most of the tribes, including by the SSBMI which has a Traditional Ecological Knowledge department to assist members with learning about respectful and traditional uses of plants and animals, and the UAIC who has a Pre-K through 8th grade school where key aspects of Indian culture and critical thinking are taught to prepare tribal members to face future challenges (Private School Review 2025; SSBMI 2025a). Tribal community service departments provide family support services to adults and children to promote the health

and well-being of tribal community members and their families as well as connection to their heritage. Common services offered by all tribes include Indian Child Welfare Act advocacy and intervention, housing assistance, health care assistance, elder programs, and grants and scholarships for higher education (Ione Band of Miwok Indians 2025; SSBMI 2025a; UAIC 2025b; Wilton Rancheria 2025a). Governance on tribal lands is typically outlined by tribally prepared constitutions, codes and/or ordinances, and are carried out by tribal departments which are in turn typically overseen by the tribal council. This includes the office of Tribal Historic Preservation Officer (THPO). Because tribes retain inherent sovereign powers over their members and territory, SSBMI and the Wilton Rancheria also have Tribal Courts which serve as culturally sensitive, independent judicial forums where tribal cultural values are held at the forefront of dispute resolutions (SSBMI 2025b; Wilton Rancheria 2025b).

This knowledge of traditions and culture are conveyed through the expertise of the traditionally and culturally affiliated California Native American tribe during consultation with lead agencies, as required by AB 52. During the consultation process, tribal cultural bearers can share information related to the project areas, such as: what event took/takes place here, and how is that event important to the Tribe; what artistic, professional, and/or ceremonial cultural tradition is represented by the resource; or how can this resource be used to teach others in the Tribe and convey Tribal values.

RECORDS SEARCHES AND CONSULTATION

Records Search

On February 23, 2026, a records search of the study area was conducted at the North Central Information Center (NCIC), at California State University, Sacramento (SAC-26-30). A study area was established to include the project site and an approximate two-block buffer to capture any property that could assist in the understanding of the history of the project location (Figure 4.14-1).

The following information was reviewed:

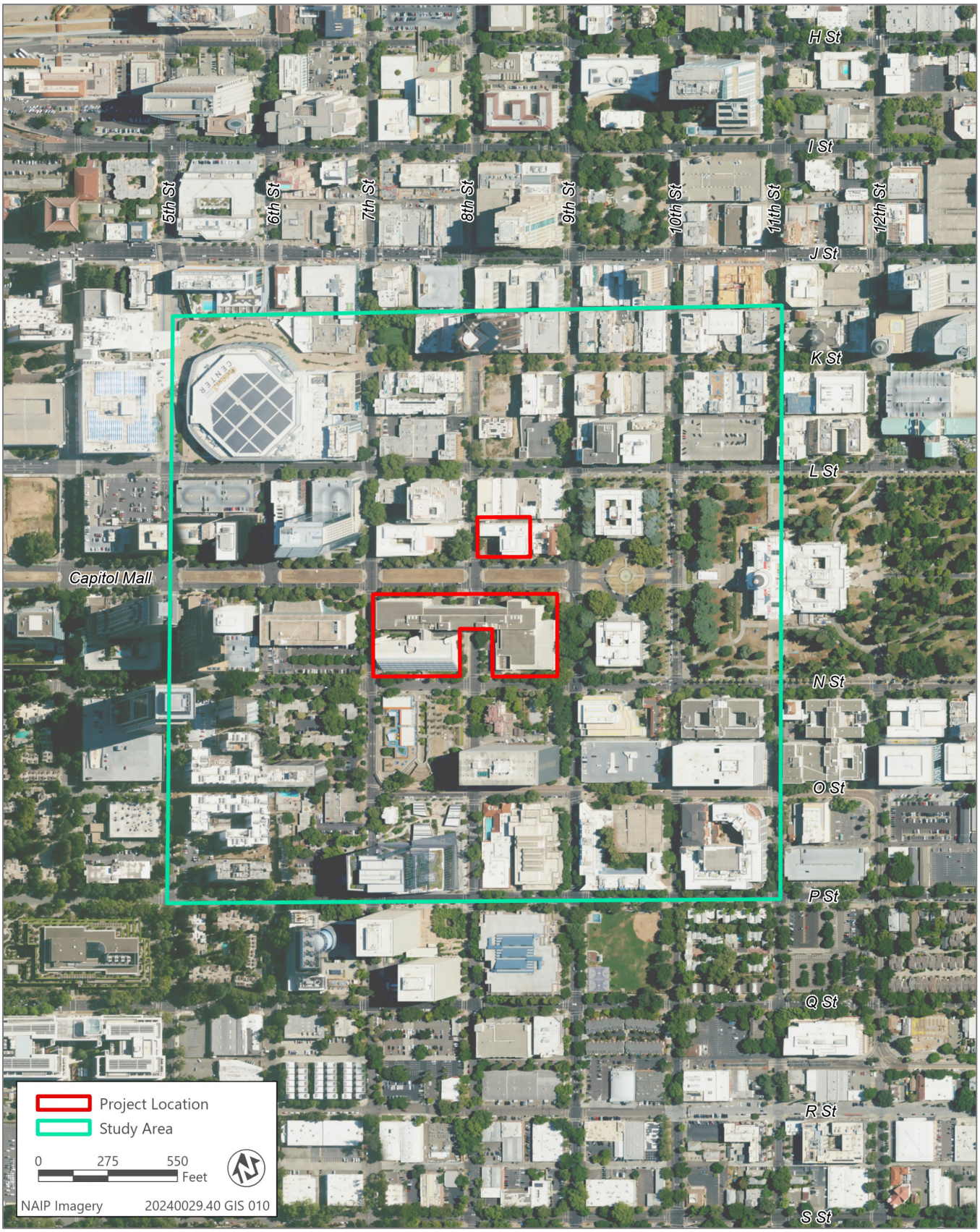
- site records of previously recorded cultural resources,
- previous cultural studies,
- NRHP and CRHR,
- the California Historic Resources Inventory, and
- the Office of Historic Preservation Historic Properties Directory.

The records search revealed that 58 studies have been conducted within the study area, resulting in the identification of 123 cultural sites. One hundred twenty of these are historic-era sites and are discussed in Section 3.2, "Cultural Resources." The remaining three are indigenous in nature.

Site P-34-000063 was recorded as a precontact site in the 1930s by Heizer, however the record does not contain any details of the site's components and only states that it was located near 10th and P streets.

Site P-34-002358 was originally recorded in 2008 and updated in 2010 and is known as "Sacramento's Buried Cultural Landscape" or as the "Raised Streets and Hollow Sidewalks District." It is a multi-component district, containing both precontact and historic-era materials and is eligible for listing under NRHP/CRHR criteria A/1, C/3, and D/4. It is located outside of and to the north of the project's area of ground disturbance. The boundaries of this historic district include the indigenous village *Sa'cum*.

P-34-005225 has been identified as the "Sacramento River Tribal Cultural Landscape" encompassing approximately 1,350 square kilometers along the Sacramento River between Rio Vista and Knights Landing. According to the documentation, the Tribal cultural landscape is a culturally significant natural landscape for its association with the cultural practices and beliefs of the Valley Nisenan and Plains Miwok, maintaining the continuing cultural identity of the living descendants and contributing to the broader patterns of prehistory. The setting (landscape), while it has been heavily altered over the past century, still retains enough of the character-defining elements (waterways, tule, fisheries, and other wildlife) to convey the significance of this resource. It is eligible for listing under NRHP/CRHR criterion A/1.



Source: adapted by Ascent in 2026.

Figure 4.14-1 Tribal Cultural Resources Study Area

Sacred Lands File Search

On February 24, 2026, the results of the NAHC Sacred Lands File search were returned as positive for the presence of Native American resources within the vicinity of the project area. The letter indicated that Ione Band of Miwok Indians, UAIC, and Wilton Rancheria should be contacted for additional information.

Tribal Consultation

On March 23, 2026, in compliance with AB 52 requirements, DGS sent letters to representatives of the Colfax-Todds Valley Consolidated Tribe, Ione Band of Miwok Indians, SSBMI, TSI-AKIM Maidu of the Taylorsville Rancheria, UAIC, and Wilton Rancheria. Wilton Rancheria, UAIC, and SSBMI all requested consultation under AB 52.

Because Tribal consultation involves the locations and details of sites, the specific details of the consultations are confidential pursuant to California law. A summary of events related to communication between the Tribes and DGS is provided below:

- April 9, 2026: Wilton Rancheria requested consultation
- April 9, 2026: UAIC requested consultation
- April 17, 2026: SSBMI requested consultation
- May 19, 2026: DGS invited Wilton Rancheria, UAIC, and SSBMI to consultation meetings, at their convenience
- June 4, 2026: DGS held a virtual meeting with SSBMI
- June 15, 2026: DGS held a virtual meeting with Wilton Rancheria
- June 17, 2026: DGS held a virtual meeting with UAIC

As a result of Tribal consultation, the Tribes requested that monitoring be conducted during project excavation activities. In response to this request, Mitigation Measure 4.14-1b, provided below, requires Tribal and archaeological monitoring during all ground-disturbing activities associated with the project.

TRIBAL CULTURAL RESOURCES

Tribal cultural resources are defined in CEQA statute Section 21074 and may include:

- **Resource Collection Location:** This is a location where Native Americans have historically gone, and are known or believed to go today, to collect resources in accordance with traditional cultural rules of practice.
- **Spiritual Location:** This is a location where Native American religious practitioners have historically gone, and are known or believed to go today, to perform ceremonial activities in accordance with traditional cultural rules of practice.
- **Traditional Location:** This is a location associated with the traditional beliefs of a Native American group about its origins, its cultural history, or the nature of the world.
- **Cemetery:** A cemetery is a location that has been selected for human burial or interment. This also includes the soil at the cemetery.

Additionally, different types of Tribal cultural resources may also be archaeological resources; they include the following features:

- **Village Site:** Village sites are locations of continuous and concentrated habitation that typically have a large, well-developed cultural soil deposit. They may also contain burials, rock art, bedrock milling stations, or other features.
- **Burial Site:** A burial site or cemetery is a location where intentional human interments are found, either articulated or disarticulated. Burial soils and offerings are included as significant.

- **Milling Site:** This is a boulder or group of boulders or bedrock outcrops that contain at least one modified surface (mortar, slick, or metate) caused by the processing of food or other natural resources. Tribes still consider these as the "kitchens" of their ancestors.
- **Lithic Scatter:** A lithic scatter is a distribution of stone flakes and tool fragments reflecting purposeful modification of parent stone through percussion and/or pressure detachment.
- **Shell Middens:** Shell middens are locations with large amounts of marine shell that extend to an appreciable depth below ground surface.
- **Mounds:** These habitation and burial sites were constructed to be areas of high ground during seasonal flooding. Because they were maintained continuously for hundreds or thousands of years in a floodplain where soil was being seasonally deposited, these mounds are often dozens of feet deep.
- **Rock Art:** Rock art consists of designs or design elements on rock surfaces created by surface applications (pictographs) or by etching (petroglyphs).
- **Rock Shelters:** These are natural caves or crevices in rock outcrops in which human use has left artifactual remains.
- **Cultural Objects:** Objects of cultural significance, such as hand stones or projectile points, that are not directly associated with a known cultural site.

One Tribal cultural resource has been identified within the vicinity of the project area. P-34-005225 was identified as part of the NCIC records search and is described as a Tribal cultural landscape. According to the documentation, this Tribal cultural landscape is a culturally significant natural landscape associated with the cultural practices and beliefs of the Valley Nisenan and Plains Miwok. It is identified by contemporary Nisenan as *Hoyo Sayo/Tah Sayo* and by contemporary Plains Miwok as *Wake-ce/Waka-Ly*. Geographically, this landscape is quite broad, encompassing what is considered the entirety of the Lower Sacramento River (south of Shasta Dam). The setting (landscape), while it has been heavily altered over the past century, still retains enough of the character-defining elements (waterways, tule, fisheries, and other wildlife) to convey the significance of this resource and a sense of continuity for living descendants. P-34-005255 has been evaluated as appearing eligible for NRHP- and CRHR-listing, and therefore is a Tribal cultural resource for the purposes of CEQA under PRC 21074.

No additional Tribal cultural resources were identified as a result of Tribal consultation.

4.14.3 Impacts and Mitigation Measures

METHODOLOGY

Information related to Tribal cultural resources is based on findings reported in the NAHC Sacred Lands File database search, the records search results (NCIC File Number SAC-26-30), as well as the results of Native American consultation under AB 52. The analysis is also informed by the provisions and requirements of state and local laws and regulations that apply to Tribal cultural resources.

PRC Section 21074 defines "Tribal cultural resources" as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American [T]ribe" that are listed or determined eligible for listing in the CRHR, listed in a local register of historical resources, or otherwise determined by the lead agency to be a Tribal cultural resource. Tribal cultural resources, which may qualify as "historical resources" pursuant to CEQA, are analyzed separately from built-environment historical resources and unique archaeological resources, which are analyzed in Section 4.13, "Cultural Resources," of this EIR.

THRESHOLDS OF SIGNIFICANCE

A Tribal cultural resources impact is considered significant if implementation of the Capitol Mall Office Buildings Demolition Project would do any of the following:

- cause a substantial adverse change in the significance of a Tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe.

ISSUES NOT DISCUSSED FURTHER

All potential Tribal cultural resources impacts are evaluated below.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 4.14-1: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource

The NCIC records search identified one Tribal cultural resource in the project area (P-34-005225) as described under AB 52. Consultation with Wilton Rancheria, UAIC, and SSBMI did not identify any additional resources. Because project-related ground-disturbing activities could result in damage to previously unknown Tribal cultural resources resulting in a substantial adverse change in its significance, the project could cause a **potentially significant** impact.

As described above, the NCIC records search identified a Tribal cultural landscape, P-34-005225. P-34-005255 has been evaluated as appearing eligible for NRHP and CRHR listing, and therefore is a Tribal cultural resource for the purposes of CEQA under PRC 21074. Wilton Rancheria, UAIC, and SSBMI all requested consultation under AB 52; virtual meetings were held with DGS to review the project, discuss any concerns, and review mitigation measures.

Demolition

P-34-005225 is a Tribal cultural landscape identified by contemporary Valley Nisenan as *Hoyo Sayo/Tah Sayo* and contemporary Plains Miwok as *Wake-ce/Waka-Ly*. The Tribal cultural resource is described as "a landscape encompassing waterways, tule habitat, fisheries, and other wildlife" (Tremaine 2018). Because the project site is developed, the project would not alter these types of characteristics. The project would not introduce new elements into the landscape, such as ones that could cause a new break in continuity of the landscape, or audible or visual intrusions. Additionally, no Tribe expressed concern related to this resource during the consultation period.

The project would include demolition of three existing buildings. The concrete slabs of these buildings will be left in place, with no excavation of footings or other subsurface disturbance. There may be some isolated utility capping for safety purposes, however this activity would include minor ground disturbance in areas that had been previously excavated during the initial utility placement.

Although the potential to encounter previously unknown subsurface Tribal cultural resources during demolition could be considered low due to the shallow nature of the ground disturbance, the downtown Sacramento area is known to contain Tribal cultural resources. The presence and distribution of six indigenous villages and *Wanoho Pakan* indicate that the area encompassed by modern Sacramento was a landscape occupied and successfully used by Native Americans.

Future Development

Similar to the demolition discussion, future development of the project site would not introduce new elements that do not currently exist in the developed downtown area; therefore, there would not be a substantial adverse change in the significance of the Tribal cultural landscape (P-34-005225). However, future development could include excavations, trenching, and other ground-disturbing activities that could result in damage to previously unknown

Tribal cultural resources. Consultation with participating Tribes has identified the project site to be highly sensitive for subsurface Tribal cultural resources for the reasons described under the demolition discussion.

Conclusion

The minor, isolated ground disturbance associated with demolition is unlikely to encounter subsurface indigenous materials, while the more-intense ground-disturbing activities associated with future development are more likely to result in damage to previously unknown subsurface Tribal cultural resources. Nevertheless, consultation with participating Tribes has resulted in identification of the project site to be highly sensitive for subsurface Tribal cultural resources; consulting Tribes have stated that both demolition and future development have the potential to damage previously unknown Tribal cultural resources, resulting in a substantial adverse change in its significance. Therefore, the project could result in a **potentially significant** impact.

Mitigation Measures

Mitigation Measure 4.14-1a: Prepare and Implement a Worker Awareness Training Program for Tribal Cultural Resources

Prior to project-specific ground-disturbing activities, a Tribal cultural resources awareness training program will be provided to all demolition and construction personnel active on the project site. A representative or representatives from culturally affiliated Native American Tribe(s) will be invited by DGS or the future entity developing the property (e.g., Sacramento State) to participate in the development and delivery of the training program in coordination with a professional archaeologist meeting the United States Secretary of Interior's qualification standards for archaeology. The program will include relevant information regarding Tribal cultural resources, including applicable laws and regulations, the consequences of violating said laws and regulations, protocols for resource avoidance, and protocols for discoveries, including who to contact in the event of a discovery and what to do upon the discovery of human remains. The program will also underscore the requirement for confidentiality and culturally appropriate treatment of any find of significance to Native Americans and protocols, consistent with Native American Tribal values.

Mitigation Measure 4.14-1b: Implement Tribal and Archaeological Monitoring

All ground-disturbing activities, including any preparatory grading, tree removal, or vegetation clearing, within the project site will be monitored by a Tribal monitor and a qualified archaeologist. DGS or future entity developing the property (e.g. Sacramento State) as appropriate, shall contact the participating Tribes a minimum of seven days prior to beginning earthwork or other ground disturbing activities to ensure a Tribal monitor is available; demolition or construction activities will proceed if no response is received 48 hours prior to ground disturbing activities. The Tribal and archaeological monitor shall complete daily monitoring logs that describe each day's activities, including construction activities, locations, soil, and any cultural materials identified. In the event that unanticipated archaeological or Tribal cultural resources are discovered, including human remains, compliance with Mitigation Measure 4.14-1c would be required. Both the Tribal monitor and the archaeological monitor have the ability to pause work at the site of the discovery and call for a longer halt to work if a discovery occurs.

Mitigation Measure 4.14-1c: Halt Ground Disturbance Upon Discovery of Subsurface Tribal Cultural Resources and Evaluate Discovered Resource

If any suspected Tribal cultural resources or resources of cultural significance to a California Native American Tribe including features, anthropogenic/cultural soils, cultural belongings or objects (artifacts), shell, bone, shaped stones or bone, or ash/charcoal deposits are discovered by any person during demolition or construction activities including ground disturbing activities (e.g., grading, excavation, or vegetation removal using equipment like excavators or bulldozers), all work shall pause immediately within 100 feet of the find, or a distance agreed upon by the Tribal monitor, archaeological monitor, DGS or future entity developing the property (e.g., Sacramento State) as appropriate, and the construction foreman based on the location and nature of the find and type of work occurring. The Tribal monitor shall determine if the find may be a Tribal cultural resource. The Tribal monitor will make recommendations for further evaluation and culturally appropriate treatment of discoveries that may be Tribal cultural resources as necessary in consultation with the archaeological monitor.

In the event Tribal cultural resources are encountered during demolition or future development on the project site, culturally appropriate treatment would be developed in consultation with the participating Tribe(s). Culturally appropriate treatment may include, but is not limited to, minimizing handling of cultural objects, leaving objects in place within the landscape, processing materials for reburial, returning objects to a location within the project area where they will not be subject to future impacts from the project, potential redesign of project components to avoid disturbance of resources, to the extent feasible, or other options. Treatments that minimize disturbance of material will be given first consideration. However, curation of Tribal cultural resources is not considered by the participating Tribes to be appropriate or respectful, and participating Tribes requested that materials not be permanently curated, unless approved by the participating Tribes. Additionally, redesign may be determined by DGS or the future entity developing the property (e.g., Sacramento State) to be technologically, regulatorily, or economically infeasible.

Any discoveries shall be documented on a Department of Parks and Recreation (DPR) 523 form within 4 weeks of the discovery and submitted to the appropriate CHRIS center in a timely manner.

If articulated or disarticulated human remains, or human remains in any state of decomposition or skeletal completeness are discovered during construction activities, the County Coroner and the culturally affiliated Tribe shall be contacted immediately. Upon determination by the County Coroner that the find is Native American in origin, the Native American Heritage Commission will assign the Most Likely Descendent who will work with the project proponent to define appropriate treatment and disposition of the burials.

Work at the discovery location cannot resume until all necessary investigation, evaluation, and treatment of the discovery under the requirements of the CEQA, specifically PRC Section 21084.3[b], have been satisfied.

Significance after Mitigation

For demolition activities, implementation of project-specific Mitigation Measures 4.14-1a through 4.14-1c would reduce impacts associated with Tribal cultural resources to a **less-than-significant** level by requiring implementation of a worker Tribal cultural resources awareness program, a Tribal monitor during ground disturbing activities, the performance of professionally accepted and legally compliant procedures in the event of a discovery, as well as the protection of any previously undocumented significant Tribal cultural resources.

For future redevelopment activities, Mitigation Measures 4.14-1a through 4.14-1c would substantially reduce the potential for adverse effects on Tribal cultural resources; however, because the specific design, grading plans, excavation depths, foundation systems, utility improvements, and other ground-disturbing construction methods associated with future redevelopment are not currently known, it is not possible to determine with certainty whether impacts to Tribal cultural resources can be fully avoided or reduced to a less-than-significant level. Therefore, impacts to Tribal cultural resources associated with future redevelopment would be **significant and unavoidable**.

4.15 BIOLOGICAL RESOURCES

This section addresses sensitive biological resources that could be affected by implementation of the Capitol Mall Office Buildings Demolition Project (project). The analysis includes a description of the existing environmental conditions, the methods used for assessment, the potential direct and indirect impacts of project implementation, and mitigation measures recommended to address impacts determined to be significant or potentially significant. Federal, state, and local regulations that pertain to biological resources are summarized.

The following data were reviewed in preparation of this analysis:

- results of a California Natural Diversity Database (CNDDB) record search of the nine US Geological Survey (USGS) 7.5-minute quadrangles including and surrounding the project site (CNDDB 2026);
- results of California Native Plant Society (CNPS) Rare Plant Inventory record search of the nine USGS 7.5-minute quadrangles including and surrounding the project site (CNPS 2026);
- list of species that may be affected by activities implemented on the project site obtained from US Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) online tool (USFWS 2026);
- California Department of Fish and Wildlife (CDFW) Special Animals List (CDFW 2026);
- observation records from online databases eBird (eBird 2026), iNaturalist (iNaturalist 2026), Western Monarch and Milkweed Mapper (Western Monarch and Milkweed Occurrence Database 2026), and Bumble Bee Watch (Xerces Society et al. 2026); and
- aerial photographs of the project site and region.

No comment letters regarding biological resources were received in response to the Notice of Preparation (see Appendix A).

4.15.1 Regulatory Setting

FEDERAL

Endangered Species Act

Pursuant to the Endangered Species Act (ESA) (16 US Code [USC] Section 1531 et seq.), USFWS and National Marine Fisheries Service (NMFS) regulate the taking of species listed in the ESA as threatened or endangered. In general, people subject to the ESA (including private parties) are prohibited from "taking" endangered or threatened fish and wildlife species on private property and from "taking" endangered or threatened plants in areas under federal jurisdiction or in violation of state law. Under Section 3 of ESA, the definition of "take" is to "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." USFWS and NMFS have previously interpreted the definition of "harm" to include significant habitat modification that could result in take. On July 14, 2026, however, USFWS and NMFS published a final rule rescinding their regulatory definitions of "harm," effective September 14, 2026. The term "harm" will remain in the ESA's statutory definition of "take" after the rescission becomes effective, but the regulatory definition expressly addressing significant habitat modification or degradation will no longer apply. The ESA requires that recovery plans be developed that describe the steps necessary to restore the species. Similarly, the act provides for the designation of "critical habitat" when prudent and determinable.

On July 14, 2026, USFWS and NMFS published a final rule rescinding the regulatory definition of "harm" from their ESA implementing regulations, effective September 14, 2026 (USFWS and NMFS 2026). The final rule relies in part on the U.S. Supreme Court's decision in *Loper Bright Enterprises v. Raimondo*, 603 U.S. 369 (2024), which overruled the Chevron doctrine. Under that doctrine, established in *Chevron U.S.A. Inc. v. Natural Resources Defense Council, Inc.*, 467 U.S. 837 (1984), courts generally deferred to a federal agency's reasonable interpretation of an ambiguous statute

administered by that agency. The final rule also cites the dissenting opinion in *Babbitt v. Sweet Home Chapter of Communities for a Great Oregon*, 515 U.S. 687 (1995), in which the Supreme Court upheld the USFWS and NMFS interpretation of "harm" as including significant habitat modification or degradation that actually kills or injures listed wildlife. Although *Loper Bright* eliminated the judicial-deference framework applied in *Sweet Home*, it did not overrule *Sweet Home*, which remains binding Supreme Court precedent. The final rule removes the regulatory definition of "harm" but does not remove "harm" from the ESA's statutory definition of "take."

Section 10 of ESA applies if a nonfederal agency is the lead agency for an action that results in take and no other federal agencies are involved in permitting the action. Section 7 of ESA applies if a federal discretionary action is required (e.g., a federal agency must issue a permit), in which case the involved federal agency consults with USFWS and NMFS.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA), first enacted in 1918, provides for the protection of international migratory birds and authorizes the Secretary of the Interior to regulate the taking of migratory birds. MBTA provides that to pursue, take, or kill any migratory bird or any part, nest, or egg of any such bird is unlawful except as permitted by regulations. Under MBTA, "take" is defined as "to pursue, hunt, shoot, wound, kill, trap, capture, or collect, or any attempt to carry out these activities." Take does not include habitat destruction or alteration as long as birds, nests, eggs, or parts thereof are not directly taken. The current list of species protected by MBTA can be found in Title 50 of the Code of Federal Regulations (CFR), Section 10.13 (50 CFR 10.13). The list includes nearly all birds native to the United States.

STATE

California Endangered Species Act

Pursuant to the California Endangered Species Act (CESA), a permit from CDFW is required for projects that could result in the "take" of a plant or animal species that is listed by the state as threatened or endangered. Section 2080 of CESA prohibits unauthorized take of state-listed species. Under CESA, "take" is defined as an activity that would directly or indirectly kill an individual of a species, but does not include "harm" or "harass," as does the federal definition. As a result, the threshold for take is higher under CESA than under ESA.

California Fish and Game Code

Protection of Bird Nests and Raptors

Section 3503 of the Fish and Game Code states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird. Section 3503.5 of the California Fish and Game Code states that it is unlawful to take, possess, or destroy any raptors (i.e., species in the orders Falconiformes and Strigiformes), including their nests or eggs. Typical violations include destruction of active nests as a result of tree removal or disturbance caused by project construction or other activities that cause the adults to abandon the nest, resulting in loss of eggs or young.

Fully Protected Species

The regulation of fully protected species is described in Sections 3511, 4700, 5050, and 5515 of the California Fish and Game Code. These statutes prohibit take or possession of fully protected species and generally do not provide for authorization of incidental take unless the species is covered and conserved in a natural community conservation plan (NCCP) or the project activities qualify for incidental take permitting under Section 2080.15 of the California Fish and Game Code. CDFW's fully protected status was California's first attempt to identify and protect animals that were rare or facing extinction. Most species listed as fully protected were eventually listed as threatened or endangered under CESA; however, some species remain listed as fully protected but do not have simultaneous listing under CESA.

California Native Plant Protection Act

State listing of plant species began in 1977 with the passage of the California Native Plant Protection Act (NPPA), which directed CDFW to carry out the legislature's intent to "preserve, protect, and enhance endangered plants in this state." NPPA gave the California Fish and Game Commission the power to designate native plants as endangered or rare and to require permits for collecting, transporting, or selling such plants. CESA expanded on the original NPPA and enhanced legal protection for plants. CESA established threatened and endangered species categories and grandfathered all rare animals—but not rare plants—into the act as threatened species. Thus, three listing categories for plants are employed in California: rare, threatened, and endangered. Sixty-four species, subspecies, and varieties of plants are protected as rare under NPPA. The act prohibits take of endangered or rare native plants but includes exceptions for agricultural and nursery operations; for emergencies; and, after proper notification to CDFW, for vegetation removal from canals, roads, and other building sites; changes in land use; and other situations.

Natural Community Conservation Planning Act

The Natural Community Conservation Planning Act of 1991 is designed to conserve natural communities at the ecosystem scale while accommodating compatible land uses through implementation of NCCPs. CDFW is the principal state agency implementing the NCCP program. Section 2800 et seq. of the California Fish and Game Code addresses NCCPs, and a 2835 permit is issued by CDFW for all NCCPs. The act established a process to allow for comprehensive, regional multispecies planning in a manner that satisfies the requirements of ESA and CESA (through a companion regional habitat conservation plan). The NCCP program has provided the framework for innovative efforts by the state, local governments, and private interests to plan for the protection of regional biodiversity and the ecosystems upon which it depends. NCCPs seek to ensure the long-term conservation of multiple species while allowing for compatible and appropriate economic activity to proceed.

LOCAL

The buildings on the project site are located on State-owned property and would be demolished by the California Department of General Services (DGS) and subsequent development is presumed to be undertaken by the California State University, Sacramento (Sacramento State), another State agency. As explained in Section 4.2, "Land Use and Planning," of this Draft EIR, under Section 4.2.1, "Local," state agencies are not subject to local plans, policies, and zoning regulations. Regarding local plans, policies, and zoning regulations, in the exercise of its discretion, DGS does reference, describe, and address local plans, policies, and regulations that may be applicable to the project. This evaluation is also intended to be used by local agencies for determining, as part of their permit processes, the project's consistency with local plans, policies, and regulations.

City of Sacramento 2040 General Plan

The following policies of the City of Sacramento 2040 General Plan may be relevant to the analysis of biological resources effects of the project:

- Policy ERC-2.2 Biological Resources. The City shall ensure that adverse impacts on sensitive biological resources, including special-status species, sensitive natural communities, sensitive habitats, and wetlands are avoided, minimized, or mitigated to the greatest extent feasible as development takes place.
- Policy ERC-2.3 Onsite Preservation. The City shall encourage new development to preserve and restore onsite natural elements that contribute to the community's native plant and wildlife species value. For sites that lack existing natural elements, encourage planting of native species in preserved areas to establish or re-establish these values and aesthetic character.
- Policy ERC-2.8 Wildlife Corridors. The City shall preserve, protect, and avoid impacts to natural, undisturbed habitats that provides movement corridors for sensitive wildlife species. If corridors are adversely affected, damaged habitat shall be replaced with habitat of equivalent value or enhanced to enable the continued movement of species.

- Policy ERC-3.3 Tree Protection. The City shall encourage public agencies and require private development projects to consider alternatives to removals of healthy trees whenever feasible and to evaluate the longer-term consequences of the inability to meet tree canopy objectives when conducting project analyses and environmental documents. Ensure adequate protections during construction to protect existing tree roots and structure.
- Policy ERC-3.6 Urban Forest Maintenance. The City shall continue to plant, manage, and care for all trees on City property and within the public right-of-way to maximize their safe and useful life expectancy and continue to prioritize the selection of tree species that are adapted to future climate conditions.
- Policy ERC-3.11 Planting. The City shall encourage development to provide trees with appropriate irrigation methods and adequate growing space; site trees to reduce building heat and provide shade to public walkways to the extent feasible; and include appropriate soil treatment methods to promote healthy thriving trees.

City of Sacramento Code of Ordinances

The City of Sacramento Tree Planting, Maintenance, and Conservation Ordinance (Chapter 12.56) includes provisions to protect City trees as well as private protected trees. All removal, trimming, pruning, cutting, or other maintenance activities on any City street tree or private protected tree requires a permit from the Director of the Department of Transportation pursuant to City Code Section 12.56.050.

A City tree is defined as any tree partially or completely located in a city park, on real property the city owns in fee, or on a public right-of-way including any street, road, sidewalk, park strip, mow strip, or alley, when measured 4.5 feet above ground. A private protected tree is defined as:

- A tree that is designated by city council resolution to have special historical value, special environmental value, or significant community benefit, and is located on private property;
- Any native Valley oak (*Quercus lobata*), blue oak (*Quercus douglasii*), interior live oak (*Quercus wislizenii*), coast live oak (*Quercus agrifolia*), California buckeye (*Aesculus californica*), or California sycamore (*Platanus racemosa*) that has a diameter at standard height (DSH) of 12 inches or more and is located on private property:
- A tree that has a DSH of 24 inches or more located on private property that is an undeveloped lot or does not include any single unit or duplex dwellings; or
- A tree that has a DSH of 32 inches or more located on private property that includes any single unit or duplex dwellings.

A tree permit is required for any regulated work. "Regulated work" means planting a city tree, or any act that could adversely impact the health of a city tree or private protected tree including:

- Removing a City tree or private protected tree;
- Pruning the branches or roots from a City tree or private protected tree;
- Affixing any signs, lights, or hardware to a City tree;
- Grading, clearing, excavating, adding fill soil, trenching, boring, compacting, or paving within the tree protection zone (i.e., the area around a tree within the outermost circumference of the canopy, or as otherwise set forth in a tree protection plan) of a City tree or private protected tree;
- Placing or storing construction equipment or construction material within the tree protection zone of a City tree or private protected tree;
- Application of any harmful substance within the tree protection zone of a City tree or private protected tree; or
- Topping a City tree or private protected tree.
- Removal of, or construction around (i.e., within the tree protection zone), trees that are protected by the tree ordinance are subject to permission and inspection by City arborists. Trees on State-owned property are generally not within City jurisdiction, and are not subject to the City's Tree Preservation Ordinance; however,

trees in the median between the curb and sidewalks are typically within City jurisdiction and subject to the City's Tree Preservation Ordinance.

4.15.2 Environmental Setting

VEGETATION AND LAND COVER TYPES

The approximately 5.5-acre project site is located in downtown Sacramento and characterized as urban landcover (CAL FIRE 2026), including development and landscaping. The 751 N St (the EDD "Solar Building" Annex; Figures 4.15-1 through 4.15-3) and the 800 Capitol Mall (EDD Headquarters; Figures 4.15-4 and 4.15-5) properties are located on the south side of Capitol Mall, and the 801 Capitol Mall (State Personnel Board Building; Figure 4.15-6) is located on the north side of Capitol Mall. A regularly maintained grass median separates east- and west-bound traffic along Capitol Mall (Figure 4.15-7). Land cover alongside project site buildings consists of a mix of manicured lawn, ornamental plants and trees (Figure 4.15-8), sidewalks, and parking. Between the EDD "Solar Building" Annex and the 722 Capitol Mall portion of the EDD Headquarters building is an open-air courtyard containing a paved street, overhead walkways, and ornamental landscaping.

Land cover surrounding the project site is similarly developed, including apartment complexes and public and private buildings. Several parks are located near the project site, including Leland Stanford Mansion State Historic Park south of 800 Capitol Mall, and the California State Capitol Park east of the project site. Vegetation surrounding the project site is similar to what is on the project site, including manicured lawns, gardens, and ornamental plants and trees.

URBAN LANDSCAPING

Urban landscaping on the project site includes barren groundcover, manicured lawns, native and non-native trees and shrubs, and a limited number of flowering plants. Public rights-of-way between sidewalks and the curbs along the perimeters of the project site contain trees, many of which meet the definition of City trees (see "City of Sacramento Code of Ordinances" above).

COMMON WILDLIFE SPECIES

The project site supports a low diversity of wildlife because it is located in a heavily developed urban area with no native vegetation communities and is subject to frequent human activity. Most of the wildlife species expected to occur in the project vicinity are adapted to urban environments and include non-native species. Common native and non-native species observed on, and in the vicinity of, the project site include birds and raptors (e.g., red-tailed hawk [*Buteo jamaicensis*], rock dove [*Columba livia*], American crow [*Corvus brachyrhynchos*], house finch [*Haemorhous mexicanus*] house sparrow [*Passer domesticus*], bushtit [*Psaltriparus minimus*], black phoebe [*Sayornis nigricans*]), mammals (e.g., brown rat [*Rattus norvegicus*], eastern gray squirrel [*Sciurus caolinensis*]), and insects (e.g., honey bees [*Apis* sp.]).



Source: Photograph by Ascent in 2026.

Exterior structures on south side of 751 Capitol Mall.

Figure 4.15-1 Representative Site Photographs



Source: Photograph by Ascent in 2026.

Ornamental vegetation within 751 Capitol Mall interior courtyard.

Figure 4.15-2 Representative Site Photographs



Source: Photograph by Ascent in 2026.

Vegetation on south side of 751 Capitol Mall, including trees in public right-of-way.

Figure 4.15-3 Representative Site Photographs



Source: Photograph by Ascent in 2026.

Lawn and landscaping at 800 Capitol Mall.

Figure 4.15-4 Representative Site Photographs



Source: Photograph by Ascent in 2026.

Landscaping at 800 Capitol Mall, including trees in public right-of-way.

Figure 4.15-5 Representative Site Photographs



Source: Photograph by Ascent in 2026.

Barren landscaping and trees at 801 Capitol Mall.

Figure 4.15-6 Representative Site Photographs



Source: Photograph by Ascent in 2026.

Lawn maintained in median between 800 Capitol Mall and 801 Capitol Mall.

Figure 4.15-7 Representative Site Photographs



Source: Photograph by Ascent in 2026.

Ornamental, flowering plants at 800 Capitol Mall.

Figure 4.15-8 Representative Site Photographs

SENSITIVE BIOLOGICAL RESOURCES

Special-Status Species

Special-status species are defined as species that are legally protected or that are otherwise considered sensitive by federal, state, or local resource agencies. Special-status species are species, subspecies, or varieties that fall into one or more of the following categories, regardless of their legal or protection status:

- officially listed by California or the federal government as endangered, threatened, or rare;
- a candidate for state or federal listing;
- taxa (i.e., taxonomic categories or groups) that meet the definitions of rare and endangered under CEQA; CEQA Guidelines Section 15380 provides that a plant or animal species may be treated as "rare or endangered" even if not on one of the official lists;
- species identified by CDFW as a "species of special concern," which is a term applied by CDFW to animals not listed under ESA or CESA, but that are declining at a rate that could result in listing or that historically occurred in low numbers and face known threats to their persistence;
- species listed as fully protected under the California Fish and Game Code;
- species afforded protection under local planning documents; or
- plant taxa considered by the CDFW to be "rare, threatened, or endangered in California" and assigned a California Rare Plant Rank (CRPR) of 1A, 1B, 2A, or 2B. The CRPR system includes five rarity and endangerment ranks for categorizing plant species of concern:
  - CRPR 1A—plants presumed to be extinct in California
  - CRPR 1B—plants that are rare, threatened, or endangered in California and elsewhere
  - CRPR 2A - Plants presumed to be extinct in California but common elsewhere;
  - CRPR 2B—plants that are rare, threatened, or endangered in California but more common elsewhere
  - CRPR 3—plants about which more information is needed (a review list)
  - CRPR 4—plants of limited distribution (a watch list).

A preliminary list of special-status plants with potential to occur on the project site was developed based on a review of the CNPS Online Inventory of Rare and Endangered Plants (CNPS 2026); a list of special-status species known to occur within the USGS 7.5-minute quadrangles including and surrounding the project site, obtained from the CNDDB (2026); and a list of species listed as endangered, threatened, or species that are candidates or proposed for listing under ESA that may be affected by the project (USFWS 2026). Table 4.15-1 summarizes the regulatory status, habitat and bloom period, and potential for occurrence on the project site of each special-status plant species evaluated.

A total of 17 special-status plant species were determined to have potential to occur on the project site based on the geographic ranges of these species and the presence of habitat suitable for the species (CNDDB 2026; CNPS 2026) (Table 4.15-1). No special-status plant species are expected to occur on the project site because habitat for these species is not present (Table 4.15-1).

A preliminary list of special-status wildlife species known or with potential to occur on the project site was developed based on a review of the CDFW Special Animals List (CDFW 2026) and the overlapping ranges of CDFW species of special concern on the project site; a list of special-status species known to occur within the USGS 7.5-minute quadrangles including and surrounding the project site, obtained from the CNDDB (2026); a list of species that are listed as endangered or threatened, or species that are candidates or proposed for listing under ESA that may be affected by the project (USFWS 2026); and occurrence information from Bumble Bee Watch, eBird, iNaturalist, and Western Monarch Milkweed Mapper occurrence databases (Xerces Society et al. 2026; eBird 2026; iNaturalist 2026; Western Monarch and Milkweed Occurrence Database 2026).

Of the 39 special-status wildlife species evaluated, 3 species were determined to have potential to occur on the project site based on the geographic ranges of these species and the presence of habitat suitable for the species (CNDDB 2026; USFWS 2026) (Table 4.15-2): Crotch's bumble bee (*Bombus crotchii*), monarch butterfly (*Danaus plexippus*), and Swainson's hawk (*Buteo swainsoni*). The remaining 36 wildlife species are not expected to occur on the project site because the geographic ranges of these species do not overlap the project site or because they are associated with habitats that will not be affected by the project (Table 4.15-2).

Of the three species that have potential to occur on the project site, only Swainson's hawks have potential to occupy the site for an extended period (i.e., nests in large trees). Limited foraging habitat (i.e., flowering plants) is available for Crotch's bumble bee and monarch butterflies; however, the project does not contain suitable overwintering, nesting, or breeding habitat for either insect species, and the species are unlikely to occur outside of temporary foraging or dispersal through the project site between areas of more suitable resources.

Common Native Nesting Birds

Trees and shrubs within the project site and vicinity provide suitable nesting habitat for non-special-status native birds that are provided protection under California Fish and Game Code and the MBTA, including common raptors (e.g., red-tailed hawk) and other native birds (e.g., American crow, house finch, bushtit, black phoebe). No nests were observed on the project site during the reconnaissance-level survey on May 13, 2026; however, a focused survey was not conducted, and there is potential that nests could be established prior to, or during delays in, project activities.

Bats

Some species of bats may use buildings for daytime, maternity, or wintering roosts. Bats may roost in abandoned or little-used structures in wall sections, behind fascia, in spaces between vaulted or interior ceiling and roofing materials, and in similar enclosed spaces that provide thermal protection. Species of bat known to roost in buildings in the downtown Sacramento area include Mexican free-tailed bat (*Tadarida brasiliensis*) and big brown bat (*Eptesicus fuscus*). Neither is considered a special-status species; however large bat roosts, and in particular maternity roosts (i.e., roosts where juvenile bats are born and mature), can be considered an important biological resource (also see the section titled "Native Wildlife Nursery Sites" below). Suitable roosting habitat for special-status bats with potential to occur in the project vicinity (i.e., pallid bat [*Antrozous pallidus*] and western red bat [*Lasiurus blossevillii*]) is not present in or adjacent to the project site as neither of these species roost in buildings. No bats were identified on the project site during the reconnaissance-level survey on May 13, 2026; however, a focused survey was not conducted.

Critical Habitat

"Critical habitat" is a term defined and used in ESA. It refers to specific geographic areas designated by USFWS or NMFS that contain features essential to the conservation of an endangered or threatened species and that may require special management and protection. No critical habitat is present on the project site.

Sensitive Natural Communities

Sensitive natural communities are native plant communities defined by CDFW as having limited distribution statewide or within a county or region and that are often vulnerable to environmental effects of projects (CDFW 2026). These communities may or may not contain special-status plants or their habitat. CDFW designates sensitive natural communities based on their state rarity and threat ranking using NatureServe's Heritage Methodology. Natural communities with rarity ranks of S1 to S3—where S1 is critically imperiled, S2 is imperiled, and S3 is vulnerable—are considered sensitive natural communities to be addressed in the environmental review processes of CEQA. Many riparian plant communities qualify as sensitive natural communities based on the plant associations therein. In addition, riparian habitats are protected under Section 1602 of California Fish and Game Code.

No sensitive natural communities have potential to occur on the project site based on the habitat types present on the project site.

Table 4.15-1 Special-Status Plants and Their Potential for Occurrence on the Project Site

Species	Federal Status[1]	State Status[1]	CRPR[1]	Habitat	Potential for Occurrence
Ferris' milk-vetch *Astragalus tener* var. *ferrisiae*	—	—	1B.1	Wetland. Meadows and seeps, valley and foothill grassland. Subalkaline flats on overflow land in the Central Valley; usually seen in dry, adobe soil. 15–245 ft in elevation. Blooms April–May. Annual.	Not expected to occur. The project site does not contain wetland habitat suitable for the species.
Bristly sedge *Carex comosa*	—	—	2B.1	Wetland. Marshes and swamps, coastal prairie, valley and foothill grassland. Lake margins, wet places; site below sea level is on a Delta island. 15–5,315 ft in elevation. Blooms May–September. Geophyte.	Not expected to occur. The project site does not contain wetland habitat suitable for the species.
Pappose tarplant *Centromadia parryi* ssp. *parryi*	—	—	1B.2	Chaparral, coastal prairie, meadows and seeps, coastal salt marsh, valley and foothill grassland. Vernally mesic, often alkaline sites. 5–1,380 ft in elevation. Blooms May–November. Annual.	Not expected to occur. The project site does not contain chaparral, grassland, marsh, or other habitat suitable for the species.
Peruvian dodder *Cuscuta obtusiflora* var. *glandulosa*	—	—	2B.2	Wetland. Marshes and swamps (freshwater). Freshwater marsh. 50–920 ft in elevation. Blooms July–October. Annual.	Not expected to occur. The project site does not contain wetland habitat suitable for the species.
Dwarf downingia *Downingia pusilla*	—	—	2B.2	Wetland. Valley and foothill grassland (mesic sites), vernal pools. Vernal lake and pool margins with a variety of associates. In several types of vernal pools. 5–1,610 ft in elevation. Blooms March–May. Annual.	Not expected to occur. The project site does not contain wetland habitat suitable for the species.
Boggs Lake hedge-hyssop *Gratiola heterosepala*	—	SE	1B.2	Wetland. Marshes and swamps (freshwater), vernal pools. Clay soils; usually in vernal pools, sometimes on lake margins. 35–7,790 ft in elevation. Blooms April–August. Annual.	Not expected to occur. The project site does not contain wetland habitat suitable for the species.
Woolly rose-mallow *Hibiscus lasiocarpos* var. *occidentalis*	—	—	1B.2	Wetland. Marshes and swamps (freshwater). Moist, freshwater-soaked river banks and low peat islands in sloughs; can also occur on riprap and levees. In California, known from the delta watershed. 0–510 ft in elevation. Blooms June–September. Geophyte.	Not expected to occur. The project site does not contain wetland habitat suitable for the species.
Ahart's dwarf rush *Juncus leiospermus* var. *ahartii*	—	—	1B.2	Valley and foothill grassland. Restricted to the edges of vernal pools in grassland. 100–330 ft in elevation. Blooms March–May. Annual.	Not expected to occur. The project site does not contain grassland or vernal pool habitat suitable for the species.
Alkali-sink goldfields *Lasthenia chrysantha*	—	—	1B.1	Vernal pools. Alkaline. 0–655 ft in elevation. Blooms February–June. Annual.	Not expected to occur. The project site does not contain vernal pool habitat suitable for the species.
Legenere *Legenere limosa*	—	—	1B.1	Vernal pools, wetland. In beds of vernal pools. 5–2,885 ft in elevation. Blooms April–June. Annual.	Not expected to occur. The project site does not contain vernal pool or wetland habitat suitable for the species.
Heckard's pepper-grass *Lepidium latipes* var. *heckardii*	—	—	1B.2	Valley and foothill grassland, vernal pools. Alkaline soils. 5–100 ft in elevation. Blooms March–May. Annual.	Not expected to occur. The project site does not contain grassland or vernal pool habitat suitable for the species.
Mason's lilaeopsis *Lilaeopsis masonii*	—	SR	1B.1	Wetland. Freshwater and brackish marshes, riparian scrub. Tidal zones, in muddy or silty soil formed through river deposition or river bank erosion. 0–35 ft in elevation. Blooms April–November. Geophyte.	Not expected to occur. The project site does not contain wetland habitat suitable for the species.

Species	Federal Status[1]	State Status[1]	CRPR[1]	Habitat	Potential for Occurrence
Slender Orcutt grass *Orcuttia tenuis*	FT	SE	1B.1	Vernal pools, wetland. Often in gravelly substrate. 80–5,760 ft in elevation. Blooms May–September (October). Annual.	Not expected to occur. The project site does not contain vernal pool or wetland habitat suitable for the species.
Sacramento Orcutt grass *Orcuttia viscida*	FE	SE	1B.1	Vernal pools, wetland. 50–280 ft in elevation. Blooms April–July (September). Annual.	Not expected to occur. The project site does not contain vernal pool or wetland habitat suitable for the species.
Sanford's arrowhead *Sagittaria sanfordii*	—	—	1B.2	Wetland. Marshes and swamps. In standing or slow-moving freshwater ponds, marshes, and ditches. 0–2,135 ft in elevation. Blooms May–October (November). Geophyte.	Not expected to occur. The project site does not contain wetland habitat suitable for the species.
Suisun Marsh aster *Symphyotrichum lentum*	—	—	1B.2	Wetland. Marshes and swamps (brackish and freshwater). Most often seen along sloughs with Phragmites, Scirpus, blackberry, Typha, etc. 0–100 ft in elevation. Blooms (April), May–November. Geophyte.	Not expected to occur. The project site does not contain wetland habitat suitable for the species.
Saline clover *Trifolium hydrophilum*	—	—	1B.2	Wetland. Marshes and swamps, valley and foothill grassland, vernal pools. Mesic, alkaline sites. 0–985 ft in elevation. Blooms April–June. Annual.	Not expected to occur. The project site does not contain wetland habitat suitable for the species.

Notes: CESA = California Endangered Species Act; CEQA = California Environmental Quality Act; CRPR = California Rare Plant Rank; CNDDB = California Natural Diversity Database; ESA = Endangered Species Act; NPPA = Native Plant Protection Act; ssp. = subspecies; var. = variety.

[1] Legal Status Definitions

Federal:
FE Endangered (legally protected)
FT Threatened (legally protected)

State:
SE Endangered (legally protected)
SR State-listed as rare (legally protected by NPPA)

California Rare Plant Ranks:
1B Plant species considered rare or endangered in California and elsewhere (protected under CEQA, but not legally protected under ESA or CESA)
2B Plant species considered rare or endangered in California but more common elsewhere (protected under CEQA, but not legally protected under ESA or CESA)

Threat Ranks:
0.1 Seriously threatened in California (more than 80% of occurrences threatened; high degree and immediacy of threat)
0.2 Moderately threatened in California (20–80% occurrences threatened; moderate degree and immediacy of threat)

Sources: CNDDB 2026; CNPS 2026.

Table 4.15-2 Special-Status Wildlife and Their Potential for Occurrence on the Project Site

Species	Federal Status[1]	State Status[1]	Habitat	Potential for Occurrence
Invertebrates				
Crotch's bumble bee *Bombus crotchii*	—	SC	Found primarily in California: mediterranean, Pacific coast, western desert, Great Valley, and adjacent foothills through most of southwestern California. Habitat includes open grassland and scrub. Nests underground.	May occur. Flowering plants on the project site provide suitable foraging habitat for Crotch's bumble bees; however, the project site does not contain habitat suitable for nesting or overwintering Crotch's bumble bees, such as small mammal burrows or leaf debris.

Species	Federal Status[1]	State Status[1]	Habitat	Potential for Occurrence
Vernal pool fairy shrimp *Branchinecta lynchi*	FT	—	Valley and foothill grassland, vernal pool, wetland. Endemic to the grasslands of the Central Valley, Central Coast mountains, and South Coast mountains, in astatic rain-filled pools. Inhabit small, clear-water sandstone-depression pools and grassed swale, earth slump, or basalt-flow depression pools.	Not expected to occur. The project site does not contain vernal pool habitat suitable for the species.
Monarch *Danaus plexippus*	FP	—	Habitat requirements include host plants for larvae (primarily milkweeds [*Asclepias* spp.]); adult nectar sources (i.e., flowering plants); and sites for roosting, thermoregulation, mating, hibernation, and predator escape. Additionally, monarch butterfly requires conditions and resources for initiating and completing migration both to and from winter roosting areas. Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby.	May occur. Flowering plants on the project site provide suitable foraging habitat for monarch butterflies; however, the project site is outside of the overwintering range of the species, and does not contain milkweed host plants suitable for breeding monarchs.
Valley elderberry longhorn beetle *Desmocerus californicus dimorphus*	FT	—	Riparian scrub. Occurs only in the Central Valley of California, in association with blue elderberry (*Sambucus mexicana*). Prefers to lay eggs in elderberries 2–8 inches in diameter; some preference shown for "stressed" elderberries.	Not expected to occur. The project site does not contain riparian habitat or blue elderberry shrubs suitable for the species.
Vernal pool tadpole shrimp *Lepidurus packardi*	FE	—	Valley and foothill grassland, vernal pool, wetland. Inhabits vernal pools and swales in the Sacramento Valley containing clear to highly turbid water. Pools commonly found in grass bottomed swales of unplowed grasslands. Some pools are mud-bottomed and highly turbid.	Not expected to occur. The project site does not contain vernal pool habitat suitable for the species.
Fish				
Green sturgeon - southern DPS *Acipenser medirostris* pop. 1	FT	SSC	Aquatic, estuary, marine bay, Sacramento/San Joaquin flowing waters Spawning site fidelity. Spawns in the Sacramento, Feather and Yuba Rivers. Presence in upper Stanislaus and San Joaquin Rivers may indicate spawning. Non-spawning adults occupy marine/estuarine waters. Delta Estuary is important for rearing juveniles. Spawning occurs primarily in cool (11–15 C) sections of mainstem rivers in deep pools (25–30 feet) with substrate containing small to medium sized sand, gravel, cobble, or boulder.	Not expected to occur. The project site does not contain aquatic habitat suitable for the species.
Sacramento perch *Archoplites interruptus*	—	SSC	Sacramento/San Joaquin flowing waters, Sacramento/San Joaquin standing waters. Historically found in the sloughs, slow-moving rivers, and lakes of the Central Valley. Prefers warm water. Aquatic vegetation is essential for young. Tolerates wide range of physio-chemical water conditions.	Not expected to occur. The project site does not contain aquatic habitat suitable for the species.
Delta smelt *Hypomesus transpacificus*	FT	SE	Estuary. Sacramento-San Joaquin Delta. Seasonally in Suisun Bay, Carquinez Strait and San Pablo Bay. Seldom found at salinities greater than 10 ppt. Most often at salinities less than 2 ppt.	Not expected to occur. The project site does not contain aquatic habitat suitable for the species.
Steelhead - Central Valley DPS *Oncorhynchus mykiss irideus* pop. 11	FT	SSC	Sacramento/San Joaquin flowing waters. Populations in the Sacramento and San Joaquin rivers and their tributaries.	Not expected to occur. The project site does not contain aquatic habitat suitable for the species.

Species	Federal Status[1]	State Status[1]	Habitat	Potential for Occurrence
Chinook salmon - Central Valley spring-run ESU *Oncorhynchus tshawytscha* pop. 11	FT	ST	Adult numbers depend on pool depth and volume, amount of cover, and proximity to gravel. Water temps greater than 27 C are lethal to adults. Federal listing refers to populations spawning in Sacramento River and tributaries.	Not expected to occur. The project site does not contain aquatic habitat suitable for the species.
Chinook salmon - Sacramento River winter-run ESU *Oncorhynchus tshawytscha* pop. 7	FE	SE	Sacramento/San Joaquin flowing waters. Sacramento River below Keswick Dam. Spawns in the Sacramento River, but not in tributary streams. Requires clean, cold water over gravel beds with water temperatures between 6 and 14 C for spawning.	Not expected to occur. The project site does not contain aquatic habitat suitable for the species.
Sacramento splittail *Pogonichthys macrolepidotus*	—	SSC	Estuary, freshwater marsh, Sacramento/San Joaquin flowing waters. Endemic to the lakes and rivers of the Central Valley, but now confined to the Delta, Suisun Bay and associated marshes. Slow moving river sections, dead end sloughs. Requires flooded vegetation for spawning and foraging for young.	Not expected to occur. The project site does not contain aquatic habitat suitable for the species.
Longfin smelt San Francisco Bay-Delta DPS *Spirinchus thaleichthys* pop. 2	FE	ST SSC	Estuary. Euryhaline, nektonic and anadromous. Found in open waters of estuaries, mostly in middle or bottom of water column. Prefer salinities of 15-30 ppt, but can be found in completely freshwater to almost pure seawater.	Not expected to occur. The project site does not contain aquatic habitat suitable for the species.
Amphibians				
Western spadefoot *Spea hammondii*	FP	SSC	Cismontane woodland, coastal scrub, valley and foothill grassland, vernal pool, and wetlands. Occurs primarily in grassland habitats, but can be found in valley-foothill hardwood woodlands. Vernal pools are essential for breeding and egg-laying.	Not expected to occur. The project area does not contain grassland, woodland, or vernal pool habitat suitable for the species.
Reptiles				
Northwestern pond turtle *Actinemys marmorata*	FP	SSC	Ponds, marshes, rivers, streams and irrigation ditches, usually with aquatic vegetation, below 6,000 ft elevation. Needs basking sites and suitable (sandy banks or grassy open fields) upland habitat up to approximately 0.3 miles (0.5 km) from water for egg-laying.	Not expected to occur. The project site does not contain aquatic or upland habitat suitable for the species.
Giant gartersnake *Thamnophis gigas*	FT	ST	Marsh and swamp, riparian scrub, wetland. Prefers freshwater marsh and low gradient streams. Has adapted to drainage canals and irrigation ditches. This is the most aquatic of the garter snakes in California.	Not expected to occur. The project site does not contain wetland or riparian habitat suitable for the species.
Birds				
Tricolored blackbird *Agelaius tricolor*	—	ST SSC	Freshwater marsh, marsh and swamp, swamp, wetland. Highly colonial species, most numerous in Central Valley and vicinity. Largely endemic to California. Requires open water, protected nesting substrate, and foraging area with insect prey within a few kilometers of the colony.	Not expected to occur. The project site does not contain marsh or wetland habitat suitable for the species.
Grasshopper sparrow *Ammodramus savannarum*	—	SSC	Valley and foothill grassland. Dense grasslands on rolling hills, lowland plains, in valleys and on hillsides on lower mountain slopes. Favors native grasslands with a mix of grasses, forbs and scattered shrubs. Loosely colonial when nesting.	Not expected to occur. The project site does not contain grassland habitat suitable for the species.

Species	Federal Status[1]	State Status[1]	Habitat	Potential for Occurrence
Golden eagle *Aquila chrysaetos*	—	FP	Broadleaved upland forest, cismontane woodland, coastal prairie, Great Basin grassland, Great Basin scrub, lower montane coniferous forest, pinyon and juniper woodlands, upper montane coniferous forest, and valley and foothill grassland. Rolling foothills, mountain areas, sage-juniper flats, and desert. Cliff-walled canyons provide nesting habitat in most parts of range; also, large trees in open areas.	Not expected to occur. The project site does not contain forest or grassland habitat suitable for the species.
Short-eared owl *Asio flammeus*	—	SSC	Great Basin grassland, marsh and swamp, meadow and seep, valley and foothill grassland, and wetlands. Found in swamp lands, both fresh and salt; lowland meadows; irrigated alfalfa fields. Tule patches/tall grass needed for nesting/daytime seclusion. Nests on dry ground in depression concealed in vegetation.	Not expected to occur. The project site does not contain grassland or wetland habitat suitable for the species.
Long-eared owl *Asio otus*	—	SSC	Cismontane woodland, Great Basin scrub, riparian forest, riparian woodland, and upper montane coniferous forest. Riparian bottomlands grown to tall willows and cottonwoods; also, belts of live oak paralleling stream courses. Require adjacent open land productive of mice and the presence of old nests of crows, hawks, or magpies for breeding.	Not expected to occur. The project site does not contain forest or riparian habitat suitable for the species.
Burrowing owl *Athene cunicularia*	—	SC SSC	Coastal prairie, coastal scrub, Great Basin grassland, Great Basin scrub, Mojavean desert scrub, Sonoran desert scrub, and valley and foothill grassland. Open, dry annual or perennial grasslands, deserts and scrublands characterized by low-growing vegetation. Subterranean nester, dependent upon burrowing mammals, most notably, the California ground squirrel.	Not expected to occur. The project site does not contain open grassland habitat suitable for the species.
Swainson's hawk *Buteo swainsoni*	—	ST	Great Basin grassland, riparian forest, riparian woodland, valley and foothill grassland. Breeds in grasslands with scattered trees, juniper-sage flats, riparian areas, savannahs, and agricultural or ranch lands with groves or lines of trees. Requires adjacent suitable foraging areas such as grasslands, or alfalfa or grain fields supporting rodent populations.	May occur. The project site does not contain nesting or foraging habitat suitable for the species; however, Swainson's hawk have been recorded within a mile of the project site (CNDDB 2026).
Northern harrier *Circus hudsonius*	—	SSC	Coastal salt and freshwater marsh. Nest and forage in grasslands, from salt grass in desert sink to mountain cienagas. Nests on ground in shrubby vegetation, usually at marsh edge; nest built of a large mound of sticks in wet areas.	Not expected to occur. The project site does not contain marsh or grassland habitat suitable for the species.
Western yellow-billed cuckoo *Coccyzus americanus occidentalis*	FT	SE	Riparian forest. Riparian forest nester, along the broad, lower flood-bottoms of larger river systems. Nests in riparian jungles of willow, often mixed with cottonwoods, with lower story of blackberry, nettles, or wild grape.	Not expected to occur. The project site does not contain riparian or forest habitat suitable for the species.
White-tailed kite *Elanus leucurus*	—	FP	Cismontane woodland, marsh and swamp, riparian woodland, valley and foothill grassland, and wetlands. Rolling foothills and valley margins with scattered oaks and river bottomlands or marshes next to deciduous woodland. Open grasslands, meadows, or marshes for foraging close to isolated, dense-topped trees for nesting and perching.	Not expected to occur. The project site does not contain woodland, grassland, or wetland habitat suitable for the species.

Species	Federal Status[1]	State Status[1]	Habitat	Potential for Occurrence
Bald eagle *Haliaeetus leucocephalus*	FD	SE FP	Lower montane coniferous forest, old growth. Ocean shore, lake margins, and rivers for both nesting and wintering. Most nests within 1 mile of water. Nests in large, old-growth, or dominant live tree with open branches, especially ponderosa pine. Roosts communally in winter.	Not expected to occur. The project site does not contain old-growth forest or large live trees suitable for the species.
Yellow-breasted chat *Icteria virens*	—	SSC	Riparian forest, riparian scrub, riparian woodland. Summer resident; inhabits riparian thickets of willow and other brushy tangles near watercourses. Nests in low, dense riparian, consisting of willow, blackberry, wild grape; forages and nests within 10 feet of ground.	Not expected to occur. The project site does not contain riparian habitat suitable for the species.
Loggerhead shrike *Lanius ludovicianus*	—	SSC	Broadleaved upland forest, desert wash, Joshua tree woodland, Mojavean desert scrub, pinyon and juniper woodlands, riparian woodland, Sonoran desert scrub. Broken woodlands, savannah, pinyon-juniper, Joshua tree, and riparian woodlands, desert oases, scrub and washes. Prefers open country for hunting, with perches for scanning, and fairly dense shrubs and brush for nesting.	Not expected to occur. The project site does not contain woodland or scrub habitat suitable for the species.
California black rail *Laterallus jamaicensis coturniculus*	—	ST FP	Brackish marsh, freshwater marsh, marsh and swamp, salt marsh, wetland. Inhabits freshwater marshes, wet meadows and shallow margins of saltwater marshes bordering larger bays. Needs water depths of about 1 inch that do not fluctuate during the year and dense vegetation for nesting habitat.	Not expected to occur. The project site does not contain wetland habitat suitable for the species.
Song sparrow ("Modesto" population) *Melospiza melodia* pop. 1	—	SSC	Artificial flowing waters, freshwater marsh, riparian forest, riparian scrub, riparian woodland, Sacramento/San Joaquin flowing waters, Sacramento/San Joaquin standing waters Central lower basin of Great Valley, from Colusa County south to Stanislaus County and east of Suisun Marshes. Breeds chiefly below 200 feet elevation. Freshwater marshes, riparian thickets, sparsely vegetated irrigation canals, and valley oak restoration sites. Cover consists of willow and nettle thickets, growths of tules and cattails, and riparian oak forests with sufficient understory of blackberry.	Not expected to occur. The project site does not contain marsh or riparian habitat suitable for the species.
Purple martin *Progne subis*	—	SSC	Broadleaved upland forest, lower montane coniferous forest. Inhabits woodlands, low elevation coniferous forest of Douglas fir, ponderosa pine, and Monterey pine. Nests in old woodpecker cavities mostly, also in human-made structures. Nest often located in tall, isolated tree/snag.	Not expected to occur. Purple martin are known to occur within bridge habitat in downtown Sacramento; however, the project suite does not contain suitable habitat for the species.
Bank swallow *Riparia riparia*	—	ST	Riparian scrub, riparian woodland. Colonial nester; nests primarily in riparian and other lowland habitats west of the desert. Requires vertical banks/cliffs with fine-textured/sandy soils near streams, rivers, lakes, ocean to dig nesting hole.	Not expected to occur. The project site does not contain riparian habitat or vertical banks/cliffs suitable for the species.
Least Bell's vireo *Vireo bellii pusillus*	FE	SE	Riparian forest, riparian scrub, riparian woodland. Summer resident of southern California in low riparian in vicinity of water or in dry river bottoms; below 2,000 feet. Nests placed along margins of bushes or on twigs projecting into pathways, usually willow, coyote brush, mesquite.	Not expected to occur. The project site does not contain riparian habitat suitable for the species.

Species	Federal Status[1]	State Status[1]	Habitat	Potential for Occurrence
Yellow-headed blackbird *Xanthocephalus xanthocephalus*	—	SSC	Marsh and swamp, wetland. Nests in freshwater emergent wetlands with dense vegetation and deep water. Often along borders of lakes or ponds. Nests only where large insects such as Odonata are abundant, nesting timed with maximum emergence of aquatic insects.	Not expected to occur. The project site does not contain wetland habitat suitable for the species.
Mammals				
Pallid bat *Antrozous pallidus*	—	SSC	Deserts, grasslands, shrublands, woodlands and forests. Most common in open, dry habitats with rocky areas for roosting. Tree roosting has also been documented in large conifer snags, inside basal hollows of redwoods and giant sequoias, and bole cavities in oaks. Roosts must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.	Not expected to occur. The project site does not contain roost sites suitable for the species.
Northern California ringtail *Bassariscus astutus raptor*	—	FP	Dens most often in rock crevices, boulder piles, or talus, but also tree hollows, root cavities, and rural buildings. Rarely use same den for more than a few days. Females with litters change dens within 10 days of birth and almost daily after 20 days.	Not expected to occur. The project site does not contain forest or denning habitat suitable for the species.
Western red bat *Lasiurus frantzii*	—	SSC	Cismontane woodland, lower montane coniferous forest, riparian forest, riparian woodland Roosts primarily in trees, 2–40 feet above ground, from sea level up through mixed conifer forests. Prefers habitat edges and mosaics with trees that are protected from above and open below with open areas for foraging.	Not expected to occur. The project site does not contain woodland habitat suitable for the species.
American badger *Taxidea taxus*	—	SSC	American badgers are most commonly found in treeless areas including tallgrass and shortgrass prairies, grass-dominated meadows and fields within forested habitats, and shrub-steppe communities. Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils. Needs sufficient food, friable soils and open, uncultivated ground. Preys on burrowing rodents. Digs burrows.	Not expected to occur. The project site does not contain open habitat suitable for the species.

Notes: CEQA = California Environmental Quality Act; CNDDB = California Natural Diversity Database; DPS = distinct population segment; ESU = evolutionarily significant unit; ssp. = subspecies.

[1] Legal Status Definitions

Federal:
FE Endangered (legally protected)
FT Threatened (legally protected)
FP Federally proposed for listing (no formal protection other than CEQA consideration)
FD Federally delisted

State:
SE Endangered (legally protected)
ST Threatened (legally protected)
SC State candidate for listing (legally protected)
FP Fully protected (legally protected)
SSC Species of special concern (no formal protection other than CEQA consideration)

Sources: CNDDB 2026; USFWS 2026.

State and Federally Protected Wetlands and Waters

The project site does not contain any state or federally protected wetlands and waters.

Wildlife Movement Corridors

A wildlife movement corridor is generally a topographical or landscape feature or movement zone that connects two or more natural habitat areas. Wildlife corridors link areas of wildlife habitat that are separated by variation in vegetation, rugged terrain, human disturbance and habitat fragmentation, or other biophysical factors. Movement corridors may provide favorable locations for wildlife to travel between different habitat areas, such as foraging sites, breeding sites, cover areas, and preferred summer and winter range locations. They may also function as dispersal corridors allowing animals to move between various locations within their range. Therefore, wildlife movement and migration corridors are considered important ecological resources by CDFW and other agencies and are protected by many local governments in California.

The project site is within a developed and urbanized landscape, is not within any essential connectivity areas (CDFW 2014) or natural landscape blocks (CDFW 2017), and does not function as a wildlife movement corridor.

Native Wildlife Nursery Sites

Nursery sites are locations where fish and wildlife concentrate for hatching or raising young, such as nesting rookeries for birds, spawning areas for native fish, fawning areas for deer, and maternity roosts for bats. Nursery sites are considered in this analysis for native wildlife that are not defined and otherwise considered under CEQA as special-status species. The project site does not contain natural vegetation suitable for most nursery sites; however, common cavity nesting bat species could roost in exterior features, including cracks, crevices, and small spaces, or within buildings. No bats were identified on the project site during the reconnaissance-level survey on May 13, 2026; however, a focused survey was not conducted.

4.15.3 Environmental Impacts and Mitigation Measures

METHODOLOGY

This impact evaluation is based on data collected during a reconnaissance-level field survey conducted on May 13, 2026, review of the data listed at the beginning of this section, review of aerial photographs, and information from several previously completed documents that address biological resources in the vicinity of the project site.

THRESHOLDS OF SIGNIFICANCE

A biological resources impact is considered significant if implementation of the Capitol Mall Office Buildings Demolition Project would do any of the following:

- have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by CDFW or USFWS;
- have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by CDFW or USFWS;
- have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
- interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;
- conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or
- conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

ISSUES NOT DISCUSSED FURTHER

Special-Status Plant Species

As described above, the project site is developed and does not include any potential habitat for special-status plant species. Therefore, no impact on any plant species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, by CDFW or USFWS, would be affected as a result of the proposed project.

Riparian Habitat and Sensitive Natural Communities

The project site is in a developed, urban environment and does not contain riparian habitat or other sensitive natural communities. There are no riparian habitats or other sensitive habitats on or adjacent to the project site, so none would be affected directly or indirectly by project activities. Therefore, no impact on riparian habitat or other sensitive natural communities would occur as part of the proposed project.

Wetlands and Aquatic Resources

The project site does not contain federally protected wetlands or other features regulated under Section 404 of the Clean Water Act. The site also does not support any wetlands or waters regulated by other agencies. Therefore, no impact on wetlands would occur as part of the proposed project.

The project sire does not contain any aquatic habitats, including any waterways supporting fish populations. In addition, runoff from the project site drains into the City's combined stormwater/sewer system and is treated before discharge. Therefore, the project would not have a direct or indirect effect on fisheries habitat or fish species.

Migratory Movement and Wildlife Corridors

The project site and surrounding downtown Sacramento area are characterized by urban development with limited vegetation, which consists primarily of ornamental trees and shrubs and manicured lawns. There are no areas of native habitats or vegetation in the project vicinity. The project site neither connects nor separates any significant wildlife habitat areas. Therefore, demolition of existing buildings and redevelopment of the site would not substantially reduce the habitat of any wildlife species, cause a wildlife species to drop below self-sustaining levels, threaten to eliminate a plant or animal community, interfere substantially with the movement of any resident or migratory wildlife species, interfere substantially with established resident or migratory wildlife corridors, or impede the use of wildlife sites (other than potentially bat maternity roosts, which is addressed in the discussion of Impact 4.15-3 below).

Adopted Conservation Plans

No adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan applies to the project site.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 4.15-1: Potential Disturbance to Foraging Crotch's Bumble Bees and Monarch Butterflies

Project implementation would involve the removal of ornamental plants, including flowering plants that may provide foraging habitat for Crotch's bumble bee and monarch butterfly. This impact would be **less than significant**.

Crotch's bumble bee was designated as a candidate for listing as endangered under CESA by the Fish and Game Commission on May 31, 2022. In June of 2023, CDFW released *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species*, which included survey and mitigation guidance for the species, as well as updated range maps (CDFW 2023). Crotch's bumble bee has undergone declines in abundance (Xerces Society 2018); however, the current range of the species includes the Sacramento area, and the species has previously been reported in parts of the city outside the project site (Xerces Society et al. 2026). Although the life history characteristics of Crotch's bumble bees are not well understood, bumble bees have three basic habitat requirements:

suitable nesting sites for the colonies, availability of nectar and pollen from floral resources during the colony period (spring, summer, and fall), and suitable overwintering sites for queens. Crotch's bumble bees are generally believed to overwinter near the ground surface in loose soil or under leaf litter or other debris, and typically nest in abandoned rodent burrows or other animal nests.

Monarch butterfly is proposed for listing under ESA. The project site is outside of the monarch overwintering range, and does not contain host plants required for breeding monarch butterflies (i.e., milkweed [*Ascelpias* spp.]); however, it is within the foraging range of the species, and monarch butterflies have previously been reported in downtown Sacramento (Western Monarch and Milkweed Occurrence Database 2026).

Demolition

The project site contains ornamental plants which may provide limited foraging resources for Crotch's bumble bees and monarch butterflies (i.e., nectar and pollen from flowering plants); however, the project site does not contain suitable overwintering, nesting, or breeding habitat for either species. Foraging Crotch's bumble bees and monarch butterflies would only likely occur on the project site if ornamental plants are flowering at the time of demolition, and are likely to avoid the site as a result of disturbance. Additionally, loss of foraging habitat would be limited to the ornamental plants removed by demolition activities, and would not constitute a significant loss of habitat. Therefore, the impact to Crotch's bumble bees or monarch butterflies would be less than significant.

Future Development

Following demolition activities, no overwintering, nesting, breeding, or foraging habitat would be present for Crotch's bumble bees or monarch butterflies as redevelopment occurs, and the species would not be expected to be present. Only after redevelopment is almost complete, and landscaping is planted, would potential foraging habitat again be present. Therefore, there would be no impact to Crotch's bumble bees or monarch butterflies from future development.

Conclusion

Demolition of the project site would remove ornamental plants which may provide limited foraging resources for Crotch's bumble bees and monarch butterflies; however, both species are likely to avoid the project area due to disturbance at the time of plant removal. Following demolition, the project site would not contain habitat or resources for either species until development is almost complete vegetative landscaping is installed at the project site. Therefore, this impact would be **less than significant** and no mitigation would be required.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.15-2: Potential Disturbance to Swainson's Hawk, Other Nesting Raptors, and Other Native Nesting Birds

Project implementation would involve the removal of trees from the project footprint. Tree removal could result in direct loss of nests and mortality of adults, chicks, or eggs if they are present when tree removal occurs. Additionally, loud noises and visual disturbance from the presence of construction equipment, trucks, and construction crews associated with project implementation could result in indirect disturbance to nesting Swainson's hawks, other nesting raptors, and other native nesting birds if they are present in trees adjacent to the project site. Indirect disturbance to nesting birds could result in nest abandonment. This impact would be **potentially significant**.

Swainson's hawk is listed as threatened under CESA. There are no known active or historic nests within the trees in the project site. The two nearest known occurrences of Swainson's hawk are approximately 0.6 miles away from the project site: one west of the project site, across the Sacramento River, and the other southeast of the project site, in the vicinity of Fremont Park (CNDDB 2026). These two occurrences are located near downtown Sacramento in areas with characteristics similar to the project site (e.g., developed land cover, roads, noise associated with urban activity). However, both areas of occurrences differ from the project site in that larger trees more suitable for nesting and roosting, and more open habitat (e.g., non-native grassland) potentially suitable for foraging are present. Other common raptors and other birds (see "Common Native Nesting Birds" above) may nest in or near the project site,

including on building structures. In addition to Swainson's hawk, Section 3503 of the Fish and Game Code states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird. The MBTA provides that to pursue, take, or kill any migratory bird or any part, nest, or egg of any such bird is unlawful except as permitted by regulations.

Demolition

The project site contains trees which may provide suitable nesting habitat for Swainson's hawk, other raptors, and other native birds (Figure 4.15-5). In addition to trees within the project site, native birds may nest on the project buildings on crevices, window ledges, horizontal supports, and other available structure components (e.g., south side of the 751 Capitol Mall EDD "Solar Annex" building as shown in Figure 4.15-1). Project implementation would involve demolition of existing buildings and structures, and the removal or trimming of trees and other vegetation. Demolition or removal of active nests could result in the injury or death of adult, young, or eggs. As stated in Section 3503 of the Fish and Game Code, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird. The MBTA prohibits the unauthorized take, killing, capture, possession, sale, or transport of protected migratory birds, their nests, and eggs. Additionally, demolition activities would involve the use of noise-generating equipment such as bulldozers, excavators, bobcats, trucks, cranes, and compressors. Although noise generated by these activities may not be substantially different from the existing urban conditions in the project vicinity (e.g., vehicle and pedestrian traffic, nearby construction activities), the noise and activity associated with demolition, including staging activities, could result in indirect disturbance to Swainson's hawk, other raptors, or other native birds, especially if nests are directly adjacent to project activities. Indirect disturbance could result in potential nest abandonment and loss of young or eggs. This impact would be potentially significant.

Future Development

Future development of the project site could include construction activities with disturbances similar to demolition activities (i.e., noise generation, removal of remaining trees if present). Operational activities associated with proposed uses, such as academic uses, housing, retail, parking, or mixed-use, would likely not be substantially different from the existing urban conditions in the project vicinity and future development would be consistent with the existing pattern of development downtown and within the vicinity of the project site. Therefore, project operation would not have a substantial adverse effect on nesting bird behavior or nesting success. Construction activity from future development may affect Swainson's hawk, other raptors, and other native birds through noise generation, at a level similar to demolition activities and potentially result in nest abandonment and loss of young or eggs. This impact would be potentially significant.

Conclusion

Demolition activities and future construction activities during redevelopment of the project site would implement similar activities, including noise associated with equipment use and the removal of trees (if present following demolition activities). This disturbance could potentially result in nest abandonment and loss of young or eggs. Future use of the project site is not likely to be substantially different from existing conditions and would not have a substantial adverse effect on nesting bird behavior or nesting success. This impact would be **potentially significant**.

Mitigation Measures

Mitigation Measure 4.15-2: Protect Nesting Swainson's Hawks, Other Raptors, and Other Native Nesting Birds During Demolition and Construction Activities

DGS shall require that the following measures are implemented before and during demolition and the entity conducting redevelopment (e.g., Sacramento State) would implement these measures during construction:

- To minimize the potential for loss of nesting raptors and other native nesting birds, tree removal and other demolition/construction activities would be conducted during the nonbreeding season (September 1 through January 31), if feasible. If tree removal and other demolition/construction activities are completed during the nonbreeding season, no further mitigation would be required.
- If tree removal and other demolition/construction activities would occur during the breeding season (February 1 through August 31), a qualified biologist would conduct a survey of trees in the project footprint to assess

whether any trees contain nesting Swainson's hawks, other nesting raptors, or other nesting native birds. If demolition/construction activities that could result in disturbance to nesting raptors lapse for greater than 14 days during the breeding season, then an additional survey will be required prior to the restart of demolition/construction.

- If no active Swainson's hawk, other raptor, or other native bird nests are present, tree removal and other demolition/construction activities could commence, and no further mitigation would be required.
- If an active Swainson's hawk, other raptor, or other native bird nest is present in a tree planned for removal, the nest tree would not be removed until the young have fledged, as confirmed by the qualified biologist.
- If an active raptor nest is present in the project footprint in a tree that is not planned for removal, the qualified biologist in coordination with CDFW would determine whether excavation, demolition, or other construction activities are likely to result in sufficient disturbance to the nest that mortality to eggs or young may occur. A no-disturbance buffer may be established around the nest. The size of the no-disturbance buffer would be determined by the qualified biologist in coordination with CDFW. Buffer size may be adjusted if the qualified biologist, in coordination with CDFW, determines that reducing the size of the buffer would not result in adverse effects on the nesting raptors. The no-disturbance buffer would be implemented until the young have fledged, as confirmed by the qualified biologist.
- If raptor nest, or nest of another bird that would be protected under Section 3503 of the Fish and Game Code, is identified outside the project footprint, the qualified biologist in coordination with CDFW would determine whether excavation, demolition, or other construction activities are likely to result in sufficient disturbance to the nest that mortality to eggs or young may occur. A no-disturbance buffer may be established around the nest. The size of the no-disturbance buffer would be determined by the qualified biologist in coordination with CDFW. Buffer size may be adjusted, or no buffer may be needed, if the qualified biologist, in coordination with CDFW, determines that reducing the size of the buffer, or not implementing a buffer, would not result in adverse effects on the nesting bird. For example, common species in urban environments, such as house finch (*Haemorhous mexicanus*), may tolerate an increase in noise or construction activities close to the nest, and presence of these nests may have no effect on nearby construction activity. The no-disturbance buffer would be implemented until the young have fledged, or there are no young in the nest (e.g., another bird has preyed on the eggs or young), as confirmed by the qualified biologist.

Significance after Mitigation

Implementation of Mitigation Measure 4.15-2 would reduce impacts on Swainson's hawk, other nesting raptors, and other native nesting birds to a **less-than-significant** level because active nests would be identified during pre-activity surveys, active nest trees would not be removed until the young have fledged, and no-disturbance buffers would be implemented to avoid indirect disturbance to active nests.

Impact 4.15-3: Disturbance to Common Bat Roosts and Maternal Colonies

Project implementation could result in inadvertent disturbance to maternal colonies of common bat species or inadvertent exclusion of these bats if they are present in the exterior or interior of existing buildings. This impact would be **potentially significant**.

Occupied roosts and maternity roosts for common bat species are present in downtown Sacramento, including freeway overpasses, parking structures, trees, vacant buildings, and cavities (e.g., in human made structures). As described above, suitable roosting habitat for special-status bats with potential to occur in the project vicinity (i.e., pallid bat [*Antrozous pallidus*] and western red bat [*Lasiurus blossevillii*]) is not present in or adjacent to the project site. No common bat species were identified during reconnaissance-level surveys; however, focused surveys were not conducted, and cavity nesting bat species could roost in exterior features of existing buildings, including cracks, crevices, and small spaces. If an occupied maternity roost is removed this would impede the use of native wildlife nursery sites.

Demolition

Project implementation would include demolition of existing buildings, which could result in disturbance or removal of a common bat maternal colony if any are present on the buildings. This impact would be potentially significant.

Future Development

Following demolition activities, suitable structures for maternal bat colonies would no longer be present on the project site. Therefore, future development and use of the project site would not result in the potential disturbance of such colonies. There would be no impact.

Conclusion

Demolition activities on the project site could result in disturbance or removal of common bat maternal colonies if present on the buildings; however, no potential maternal colony habitat would be present following demolition activities, regardless of future development or use. Therefore, this impact would be **potentially significant**, but only for demolition activities.

Mitigation Measures

Mitigation Measure 4.15-3: Prior to Building Demolition Conduct Surveys for Bats and Exclude Bats from Roosting Sites

DGS shall require that the following measures are implemented before and during building demolition:

- Before demolition activities begin for a particular building, a qualified biologist will conduct a survey of the exteriors and interiors of the building on the project site planned for demolition. If evidence of bat use is observed, the species and number of bats using the roost would be determined. Bat detectors may be used to supplement survey efforts. If no evidence of bat roosts are found, then no further study and no further mitigation would be required.
- If bat roosts or a confirmed maternity colony are found, bats would be excluded from the roosting site before demolition begins. Exclusion efforts may be restricted during periods of sensitive activity (e.g., during hibernation or while females in maternity colonies are nursing young). After it is confirmed that bats are not present in the original roost site, demolition activities may commence.

Significance after Mitigation

Implementation of Mitigation Measure 4.15-3 would reduce impacts on common bat roosts and maternity colonies to a **less-than-significant** level because roosts and maternity colonies would be identified, maternity colonies would be protected while females are nursing young, and bats would be excluded from buildings prior to demolition activities.

Impact 4.15-4: Conflict with Any Local Policies or Ordinances Protecting Biological Resources

Implementation of the project could result in the direct loss or temporary disturbance of trees protected under the City of Sacramento Tree Preservation Ordinance. This impact would be **potentially significant**.

Trees on State-owned land are generally not subject to the City of Sacramento Tree Preservation Ordinance; however, project implementation may involve removal or disturbance of trees that may qualify as "City trees" within the public right-of-way (see discussion of the City of Sacramento Code of Ordinances in Section 4.15.1, "Regulatory Setting," and Figure 4.15-5).

Demolition

City trees in the public right-of-way may be removed or disturbed by demolition activities, including complete removal, pruning, root cutting (i.e., for underground utility access), or activities within tree protection zones. Loss or disturbance of City trees would conflict with tree protection requirements of the City of Sacramento Code of Ordinances. This impact would be potentially significant.

Future Development

Although specific plans have not been developed, future development and use of the project site would result in the same potential disturbances to City trees as those during demolition activities, including complete removal, pruning, root cutting, or activities within tree protection zones. Therefore, this impact would be potentially significant.

Conclusion

Demolition and future development of the project site could result in loss or disturbance of City trees in violation of the City of Sacramento Tree Preservation Ordinance. Therefore, this impact would be **potentially significant**.

Mitigation Measures

Mitigation Measure 4.15-4: Protect, Remove, and Replace City Trees Consistent with the City of Sacramento Tree Preservation Ordinance

Before demolition or construction activities begin, DGS (for demolition) or the entity conducting redevelopment (for construction) would complete a survey of City trees at the project site and prepare and submit a detailed tree removal, protection, replanting, and replacement plan to the City arborist. The tree removal plan will be developed by a certified arborist. Separate plans may be prepared for different phases of demolition and future construction; however, each project phase would not be initiated until a completed plan addressing that phase is provided to the City. The plan shall include the following elements:

- The number, location, species, health, and sizes of all City trees to be removed, relocated, or replaced will be identified. This information would also be provided on a map/design drawing to be included in the project plans.
- Planting techniques, the necessary maintenance regime, success criteria, and a monitoring program for all City trees planted or disturbed but retained on the project site would be described.
- DGS or the future entity implementing redevelopment (e.g., Sacramento State) would ensure implementation of the tree removal, protection, replanting, and replacement plan during project implementation.

Significance after Mitigation

Implementation of Mitigation Measure 4.15-4 would reduce potentially significant impacts associated with City tree removal or disturbance to a **less-than-significant** level by protecting existing City trees, providing replacement trees where appropriate. and complying with the City's Tree Preservation Ordinance.

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4.16 PUBLIC SERVICES AND RECREATION

This section provides an overview of existing public services in the City of Sacramento and evaluates the potential for implementation of the Capitol Mall Office Buildings Demolition Project to affect availability, service level, and/or capacity of public services, including fire protection services, police protection services, parks and recreation, and public schools, and, if such an effect is determined to occur, whether new or expanded facilities would be required that could result in a potentially significant impact to the environment. Other publicly provided utility services, such as water and wastewater treatment, stormwater management, solid waste, electricity, and natural gas services, are addressed in Section 4.5, "Utilities and Service Systems."

No comments regarding public services or recreation were received in response to the Notice of Preparation (see Appendix A).

4.16.1 Regulatory Setting

FEDERAL

No federal plans, policies, regulations, or laws are applicable to the provision of public services for the project.

STATE

California Fire Code

The 2025 California Fire Code, which incorporates by adoption the 2024 International Fire Code, contains regulations related to construction, maintenance, and use of buildings. Topics addressed in the California Fire Code include fire department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, hazardous materials storage and use, provisions intended to protect and assist fire responders, industrial processes, and many other general and specialized fire-safety requirements for new and existing buildings and the surrounding premises. The California Fire Code contains specialized technical regulations related to fire and life safety.

California Health and Safety Code

State fire regulations are set forth in Sections 13000 et seq. of the California Health and Safety Code, which includes regulations for building standards (as set forth in the California Building Code), fire protection and notification systems, fire protection devices such as extinguishers, smoke alarms, high-rise building and childcare facility standards, and fire-suppression training.

California Building Standards Code (Title 24)

Energy consumption of new buildings in California is regulated by State Building Energy Efficiency Standards contained in the California Code of Regulations, Title 24, Part 2, Chapter 2-53. Title 24 applies to all new construction of both residential and nonresidential buildings, and regulates energy consumed for heating, cooling, ventilation, water heating, and lighting. The 2016 Building Energy Efficiency Standards have improved efficiency requirements from previous codes, and the updated standards are expected to result in a statewide energy consumption reduction.

Effective January 1, 2011, CALGreen became California's first green building standards code. It is formally known as the California Green Building Standards Code, Title 24, Part 11, of the California Code of Regulations. CALGreen establishes mandatory minimum green building standards and requirements for construction and demolition (C&D) material diversion. Under Section 5.408 of the CALGreen Code, projects involving C&D activities are required to recycle and/or salvage for reuse a minimum of 65 percent of their nonhazardous C&D material. Applicable projects, such as the Capitol Mall Office Buildings Demolition Project, are required to prepare and implement a construction waste management plan.

Capitol Area Plan

The Capitol Area Plan (CAP), originally adopted in 1977 and updated in 1997, is the statutory master plan for development on State-owned land surrounding the State Capitol building (DGS 1997), in accordance with Government Code Section 8160 et seq. The CAP envisions State offices, housing, neighborhood commercial, parking, and multimodal streets creating a vibrant urban district in the heart of Sacramento. The Department of General Services (DGS) developed the CAP and is responsible for its administration. Chapter 6 of the CAP discusses opportunities and improvements for open space and public amenities; specifically, it aims to achieve a network of attractive and convenient open spaces and access routes to improve the environment for workers, residents, and visitors.

LOCAL

The buildings on the project site are located on State-owned property and would be demolished by DGS and subsequent development is presumed to be undertaken by the California State University Sacramento (Sacramento State), another State agency. As explained in Section 4.2 "Land Use" of this Draft EIR, under Section 4.2.1 "Local Plans, Policies, Regulations, and Laws," state agencies are not subject to local plans, policies, and zoning regulations. Nevertheless, in the exercise of its discretion, DGS does reference, describe, and address local plans, policies, and regulations that may be applicable to the project. This evaluation is also intended to be used by local agencies for determining, as part of their permit processes, the project's consistency with local plans, policies, and regulations.

City of Sacramento 2040 General Plan

The following policies in the General Plan Public Health and Safety Element may be relevant to the analysis of effects on law enforcement, fire, and emergency services. The policies listed below from the Youth, Parks, Recreation, and Open Space Element may be relevant to the analysis of effects on parks and recreation.

Public Facilities and Safety Element

Law Enforcement and Crime Prevention

- **Policy PFS 1.1: Crime and Law Enforcement**. The City shall continue to work cooperatively with the community, regional law enforcement agencies, local government agencies, and other entities to provide quality police service that protects the long-term health, safety, and well-being of the community.

Fire Prevention and Protection

- **Policy PFS-1.6: Fire Prevention Programs and Suppression**. The City shall deliver fire prevention programs that protect the public through education, adequate inspection of existing development, and incorporation of fire safety features in new development.
- **Policy PFS-1.7: Water Supply for Fire Suppression.** Ensure that adequate water supplies are available for fire suppression throughout the city and require development to construct all necessary fire suppression infrastructure and equipment.
- **Policy PFS-1.9: Equipment, Facilities, and Staffing**. The City shall locate and maintain police and fire equipment, facilities, and staffing at locations and levels that allow for effective service delivery.

Efficient Delivery of Services

- **Policy PFS-1.14: Timing of Services.** The City shall monitor the pace of residential and commercial growth in Sacramento and make best efforts to match that growth with commensurate increases in public safety personnel, equipment, and facilities.
- **Policy PFS-1.15: Development Fees for Facilities and Services.** Require development projects to contribute fees necessary to ensure the provision of adequate police and fire services.

- **Policy PFS-1.16: Development Review.** Continue to require new development projects to incorporate appropriate safety features and include the Sacramento Police Department and Sacramento Fire Department in the development review process to minimize fire hazards and criminal activity while facilitating efficient emergency response.
- **Policy PFS-2.2: Critical Infrastructure.** The City shall protect and maintain critical infrastructure such as emergency shelters, fire stations, police stations, emergency operations centers, communications networks, and other emergency service facilities and utilities to ensure continuity of essential operations, including, but not limited to, uninterrupted public safety services during flooding, seismic, geologic, wildfire, and other hazards.

Youth, Parks, Recreation, and Open Space Element

Parks and Open Space System

- **Policy YPRO-1.1 Range of Experiences.** The City shall provide a range of parks and recreational facilities and strive to ensure an equitable distribution of high-quality facilities throughout Sacramento.
- **Policy YPRO-1.3 Parkland Service Standard.** The City shall evaluate, as needed, the equitable increase of public park acreage to serve the needs of the current and future residents with high-quality facilities. The City shall continue to strive to achieve a parkland service standard of 8.5 acres of parkland per 1,000 residents, which includes neighborhood parks, community parks, regional parks, open space, and parkways.
- **Policy YPRO-1.4 Parkland Dedication Requirements.** The City shall continue to require that new residential development projects contribute toward the provision of adequate parks and recreational facilities to serve the new residents, either through the dedication of parkland, the construction of public and/or private recreation facilities, or the payment of parkland in-lieu fees, consistent with the Quimby Ordinance. To achieve the level of service for all parkland in all areas of the city, the City shall seek other funding resources to prioritize park needs in park deficit areas.
- **Policy YPRO-1.5 Incentivizing Onsite Public Facilities**. The City shall continue to provide Park Impact Fee (PIF) credit for development projects that provide publicly accessible parks, plazas, and parkways onsite that promote active or passive recreational opportunities and serve as neighborhood gathering points.
- **Policy YPRO-1.9 Timing of Services.** The City shall monitor the pace and location of new development through the development review process and long-range planning efforts to strive to ensure that development of parks, recreation programming, and community-serving facilities and services keeps pace with growth.

Facility Access, Programming, and Safety

- **Policy YPRO-1.10 Parkland Access Standard**. In residential areas that do not have an accessible park or recreational open space within a 10-minute walk, the City shall evaluate the equitable increase of public park acreage, prioritizing communities with an existing deficit of high-quality facilities.
- **Policy YPRO-1.11 Enhancing Access to Parks**. The City shall pursue strategies that increase community access to parks and recreational facilities, including the following:
  - Expanding joint-use agreements with schools and educational institutions;
  - Removing of physical barriers to access (e.g., fences); and
  - Providing a choice of legible and navigable routes to and from park areas through the installation of new or improved multi-use shared paths, wayfinding signage, and coordination with public transit.
- **Policy YPRO-1.15 Path Connections**. The City shall maintain existing and pursue new connections to local and regional shared-use paths, especially when connecting to public parkland.
- **Policy YPRO-2.3 School Facilities**. The City shall continue to coordinate with school districts in facility planning efforts to ensure the optimal use of existing sites and adequate advanced planning for embedding new school sites and facilities in the neighborhoods they serve. In addition to each school district's criteria and the school

siting guidelines of the California Department of Education, the following City criteria should be applied by school districts in identifying new school sites:

- Locate elementary schools on sites that are safely and conveniently accessible, transit-supportive, and away from heavy traffic, excessive noise, and incompatible land uses;
- Locate school sites centrally with respect to their planned attendance areas;
- Locate schools in areas where established and/or planned walkways, bicycle paths, or greenways link schools with surrounding uses; and
- Locate, plan, and design new schools to be compatible with adjacent uses

Sacramento Parks and Recreation Master Plan

The Sacramento Parks and Recreation Master Plan is a policy document that addresses recreation and human services, children's and teen programs, community centers, park planning and development, partnerships, maintenance and tree planting, park operations and maintenance, marketing and special events, sustainability and department-wide administrative services. Some of the Parks and Recreation Master Plan policies that are relevant to the project are listed here:

- **Policy 3.5:** Encourage integration of park and recreational amenities into the design of commercial, infill, employment, redevelopment, and transit-oriented development.
- **Policy 12.1:** Achieve Park Acreage Service Level Goals to provide public recreational opportunities within a reasonable distance of all residences and workplaces as follows:
  - a) 5.0 acres per 1,000 population consisting of two park categories:
    - (1) Neighborhood Serving: 2.5 acres per 1,000 population with a service area guideline of ½ mile.
    - (2) Community Serving: 2.5 acres per 1,000 population with a service area guideline of three miles, portions of which may also serve neighborhood needs.
  - b) Citywide/Regionally Serving: 8.0 acres per 1,000 population, portions of which may also serve either neighborhood or community needs.
  - c) Linear Parks/Parkways and Trails/Bikeways: 0.5 linear miles/1,000 population of trails/bikeways implemented per adopted City Bikeway and Pedestrian Master Plans.
- **Policy 12.9:** Take an active role in ensuring sufficient parks, open space, parkways, and trails by participation in the land use planning and development processes of the City and other agencies.
- **Policy 12.10:** Through the development conditioning process, encourage provision of private open space and recreation facilities in high density residential projects, mixed use projects, and employment centers in the vicinity of transit corridors to meet a portion of the open space and recreational needs of residents, employees, and visitors that will be generated by that development.

4.16.2 Environmental Setting

FIRE PROTECTION

The Sacramento Fire Department (SFD) provides fire prevention and protection services to the entire city, including the Capitol Mall Office Buildings Demolition Project evaluated in this EIR, and some small areas outside the city boundaries within the county. Contracted areas within SFD's jurisdiction include the Contracted areas within SFD's jurisdiction include the Fruitridge, Natomas, and Pacific Fire Protection Districts (SFD n.d.: 5).

Under the direction of the Fire Chief, SFD is divided into three divisions: Office of Emergency Operations, Office of Resource Management, and Office of Community Risk Reduction. In addition to fire prevention and protection services, SFD manages emergency medical services, a hazardous materials program, a domestic preparedness program, an urban search and rescue task force, and a swift water rescue program. SFD also maintains automatic aid agreements with all of its neighboring agencies and participates in the State mutual aid response system in coordination with the California Emergency Management Agency.

Twenty-four fire stations and engine companies are strategically located throughout the city to provide assistance to area residents. Each fire station operates within a specific district that encompasses the immediate geographical area around the station. Five stations are located in the downtown and eastern sections of the city (SFD 2026). SFD deploys eighteen 24-hour Advanced Life Support (ALS) ambulances and up to three flex ALS ambulances when needed. SFD handles more than 90,000 medical aid calls annually, which account for more than 80 percent of total department calls (SFD 2026).

The fire stations within proximity to the project site are:

- Station 1 at 624 Q Street, approximately 0.26 miles southwest of the project site;
- Station 2 at 1229 I Street, approximately 0.40 miles northeast of the project site;
- Station 5 at 731 Broadway, approximately 0.87 miles south of the project site; and
- Station 14 at 3145 Granada Way approximately 1.76 miles east of the project site.

Station 1 would provide first responder service to the project site. This station is located at 624 Q Street and provides fire protection and emergency response services, including response to fires, medical emergencies, motor vehicle accidents, rescue calls, and hazardous materials incidents (City of Sacramento 2026).

Consistent with City General Plan Policy PHS 2.1.2, the City strives to maintain emergency response times that provide optimal fire protection and emergency medical services to the community. Actual response times are based on the closest available station and unit availability and can vary by incident type, call processing time, turnout time, travel time, and ambulance offload conditions. The City has been evaluating service delivery and response performance through standards-of-cover and EMS system reviews, including recent efforts to improve ambulance availability and reduce delays associated with low-acuity calls and hospital offload times (SFD 2026).

Recent public reporting indicates that SFD's EMS Division responded to 98,157 calls between July 2023 and June 2024, and that EMS demand continues to affect ambulance availability and response performance (SFD 2026).

An important requirement for fire suppression is adequate fire flow, which is the amount of water, expressed in gallons per minute (gpm), available to control a given fire and the length of time this flow is available. The total fire flow needed to extinguish a structural fire is based on a variety of factors, including building design, internal square footage, construction materials, dominant use, height, number of floors, and distance to adjacent buildings. Minimum requirements for available fire flow at a given building are dependent on standards set in the California Fire Code.

LAW ENFORCEMENT

California Highway Patrol

Police protection to State-owned property is provided by the California Highway Patrol (CHP) Capitol Protection Section (CPS). CPS is located at 1801 Ninth Street in Sacramento. This specific CHP office is responsible for providing police and safety services to the occupants of and visitors to the State Capitol building, Capitol Park, and hundreds of State-owned facilities in downtown Sacramento. CPS personnel are on duty all day and every day of the year (CHP 2026).

City of Sacramento Police Department

Police protection services are provided by the Sacramento Police Department (SPD) for areas within the city. Patrol units for downtown Sacramento originate at the Richards Station (300 Richards Boulevard), approximately 1.24 miles north of the project site. Police headquarters are located at the Public Safety Center, Chief John P. Kearns Administration Facility

(5770 Freeport Boulevard). The Central Command, providing services to the downtown area, includes mounted, bike, marine, and foot beat units. The department uses a variety of data that include geographic information system-based data, call and crime frequency information, and available personnel on an annual basis to meet the changing law enforcement demands of the city.

In 2024, SPD had 755 sworn staff and 376 professional staff, with 78 sworn vacancies and 92 professional staff vacancies (SPD 2024). In 2023, SPD received 666,890 total calls for service, including 163,037 dispatched calls for service and 58,978 officers proactively initiated. SPD does not have an adopted response time standard.

SCHOOLS

The Sacramento City Unified School District (SCUSD) provides educational services to the City of Sacramento, including the Capitol Mall Office Buildings Demolition project site. SCUSD serves over 43,000 students in 77 schools. The three schools that serve the project vicinity are William Land Elementary School, Miwok Middle School, and C.K. McClatchy High School. As shown in Table 4.16-1, enrollment numbers have varied over the 2021-2024 school years. As of 2025, William Land Elementary School has available capacity for additional students; however, Miwok Middle School and C.K. McClatchy High School are at or slightly above identified capacity.

Table 4.16-1 School Enrollment

School	Number of Students				Available Capacity?
	2021/2022	2022/2023	2023/2024	School Capacity	
William Land Elementary School	366	351	331	367	Yes
Miwok Middle School	1,088	1,075	1,184	1,181	No
C.K. McClatchy High School	2,353	2,427	2,481	2,481	No

Source: California Department of Education 2026; National Center for Education Statistics 2018.

RECREATION

Recreational facilities in the vicinity of the project site include numerous parks serving the Capitol Area, including the 1.8-acre Leland Stanford Mansion State Historic Park, 37-acre Capitol Park, the approximately 3-acre Roosevelt Park, and other parks more distant from the project site. Each of these parks is less than 0.3 miles from the project site.

The City of Sacramento's Youth, Parks, and Community Enrichment Department provides recreation and leisure opportunities to the city with its park facilities and recreation programming. The City operates and maintains approximately 4,358 acres of developed parkland in 241 parks (City of Sacramento 2026). The Central City includes 31 parks, including neighborhood parks, community parks, city regional parks, city parkways, open space, and school parks (City of Sacramento 2024).

The City owns and maintains Leland Stanford Mansion State Historic Park, directly south of 800 Capitol Mall; Caesar Chavez Plaza Park, located approximately 0.16 miles northeast of the project site; and Roosevelt Park, located approximately 0.17 miles south of the project site. Leland Stanford Mansion State Historic Park, located at 800 N St, is 2.76 acres and includes a baseball field and soccer field. Caesar Chavez Plaza Park, located at 910 I Street, is 2.54 acres and includes a farmers' market area, two group picnic areas, community/senior center, three trails, a restaurant concession, and an event venue. Roosevelt Park is located at 1615 Ninth Street, between Ninth and 10th Streets and P and Q Streets. This approximately 3-acre park includes picnic areas, a lighted baseball field, and a full-size soccer field.

The City's desired service area goal, identified in the policies listed above, is to provide public recreational opportunities within a reasonable walking or driving distance of all residences and concentrations of worker populations. The Sacramento Parks Plan 2040 provides a mechanism for acquiring parkland dedications and providing long-range planning for accommodating the future recreational needs of the city. The City's adopted 2040 General Plan identifies a citywide goal of 8.5 acres of neighborhood and community parks, regional parks, parkways, and open space per 1,000 residents. The General Plan identifies approximately 4,330 acres of existing public parkland

and states that, with planned additions of more than 648 acres, the citywide service level would be approximately 7.64 acres of parkland per 1,000 residents in 2040 (City of Sacramento 2024a).

- The Parks Plan 2040 and the 2040 General Plan emphasize a citywide parkland goal of 8.5 acres per 1,000 residents for neighborhood and community parks, regional parks, parkways, and open space, rather than separate neighborhood-serving, community-serving, and citywide/regional service-level ratios.
- Approximately 84 percent of Sacramento residents live within a 10-minute walk of a park, while approximately 16 percent live in park access gap areas (City of Sacramento 2024b).
- The Parks Plan 2040 identifies a need for approximately 66 new parks in existing neighborhoods to improve equitable access, particularly in underserved and vulnerable communities (City of Sacramento 2024b).

The City continues to identify a parkland service-level shortfall relative to its adopted 8.5 acres-per-1,000-residents goal. The 2040 General Plan indicates that planned park additions would increase the citywide parkland inventory but would still result in an estimated 7.64 acres per 1,000 residents in 2040, below the citywide goal (City of Sacramento 2024a).

4.16.3 Environmental Impacts and Mitigation Measures

METHODOLOGY

Evaluation of potential public service and recreation impacts was based on a review of documents pertaining to the proposed project, including the City of Sacramento General Plan and the Capitol Area Plan; consultation with appropriate public service providers, such as SFD, CHP, SPD, and SCUSD; and field review of the project study area and surroundings. Impacts on public services and recreation that would result from the project were identified by comparing existing service capacity and facilities against future demand associated with project implementation.

The increases in demand for public services and recreation associated with future development of the project site are based on the development assumptions presented in Table 4.16-2 and in Section 4.3, "Population, Employment, and Housing."

Table 4.16-2 Development Assumptions

Development Component	Assumption	Estimated Population
Residential Development		
Student Housing	500 units at 1.5 residents per unit	750 residents
Market-Rate Apartments	750 units at 2.6 residents per unit	2,000 residents
Total Residential Development	**1,250 housing units**	**2,750 residents**
Employment and Other Uses		
University Employees	Faculty and staff	500 employees
University Students	Enrollment	4,500 students
Conference and Event Center	Operational staffing assumption	20 employees
Indoor Performing Arts and Music Venue	Operational staffing assumption	20 employees
Retail/Office Uses	Employment generated by proposed uses	2,668 employees
Total Permanent Employment	**University, event center, arts/music venue, and retail/office uses**	**3,208 employees**
Total Students	**University enrollment only**	**University enrollment only**
Total Project Site Employees and Residents	**Employees + residents**	**5,958 people**

Source: Compiled by Ascent in 2026.

THRESHOLDS OF SIGNIFICANCE

A public services and recreation impact is considered significant if implementation of the Capitol Mall Office Buildings Demolition Project would do any of the following:

- result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:
  - fire,
  - police protection,
  - schools,
  - parks, and
  - other public facilities;
- increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or
- include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.

ISSUES NOT DISCUSSED FURTHER

The project consists of the removal of three existing state-owned office buildings and future development of the site with academic, residential, hospitality, commercial, entertainment, parking, and related uses. The project would not include the construction or expansion of recreational facilities. Therefore, the project would not result in adverse physical effects associated with the construction or expansion of recreational facilities, and this issue is not discussed further in this EIR.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 4.16-1: Increased Demand for Fire Protection Services, Facilities, and Equipment

The proposed project consists of the removal of three existing state-owned office buildings in downtown Sacramento, along Capitol Mall and N Street. Future development would result in an increased demand for fire protection facilities, equipment, and services. SFD would have adequate facilities and equipment to serve the project, would participate in the environmental review process, and would recommend fire prevention measures. In addition, the project would meet the minimum necessary fire protection and safety requirements identified in applicable codes and regulations. Therefore, this impact would be **less than significant**.

Demolition

The Capitol Mall Office Buildings Demolition Project includes demolition of the three existing, state-owned buildings in downtown Sacramento, along Capitol Mall and N Street. Through demolition, DGS would remove underutilized office space and allow for the future development of other uses within these parcels.

The project area is located within the service area of SFD, whose Fire Station No. 1 would provide first responder service to the project. Abatement and demolition activities would require approximately 15 to 55 construction workers on-site during active work periods, with workforce levels varying by phase. Because demolition activities would result in a temporary workforce that would not exceed the existing occupancy of the office buildings and would be adequately served by existing SFD facilities and response capabilities, demolition would not result in substantial adverse physical impacts associated with the provision of fire protection services.

Future Development

Upon completion of the building demolition, the site is intended to be ready for construction of future uses by Sacramento State. Potential future uses being considered for the Downtown Sacramento campus of Sacramento State include academic, residential, hospitality, commercial, entertainment, parking, and related uses with total development anticipated to comprise approximately 3,630,000 gross square feet (gsf) at full buildout. Pending future development, portions of the site that remain undeveloped may accommodate interim uses, which could include construction staging, paved surface parking, special events, concerts, farmers markets, pop-up retail markets, shipping-container-based retail and food vendor markets, and similar temporary activities.

Redevelopment of the site would increase the number of residents, students, employees, visitors, and event attendees compared to existing conditions, which could increase demand for fire protection services. At buildout, the project site is expected to accommodate approximately 5,960 employees, students, and staff on a regular basis (see Table 4.16-2). In addition, the proposed retail, entertainment, arts, and event venue uses would attract visitors and event attendees, resulting in higher periodic site populations.

Future development would be required to comply with applicable regulations regarding fire protection. Although the specific design, intensity, phasing, and occupancy associated with future development have not yet been determined, the proposed development would include fire sprinkler systems for each building designed in accordance with California Building Code requirements.

SFD has equipment designed to fight multistory building fires, including a 150-foot aerial ladder used for high-rise structures. As part of the future development, SFD would participate in the environmental review process by reviewing project design plans and may recommend additional design features or other fire safety prevention measures, as necessary. Regular inspections would be conducted to enforce fire protection and building code and safety standards in existing structures and new construction. In addition, fire safe construction activities are encouraged through inspection and plan checks of site access for emergency equipment, and through the confirmation of the availability of water supplies for new construction. Buildings over 75 feet must conform to applicable provisions of the State of California Building Code for high-rise buildings, including requirements for fire suppression systems such as sprinklers. New buildings would also be constructed in accordance with applicable fire protection and life-safety requirements of the California Fire Code, California Building Code, and other applicable regulations, including provisions applicable to high-rise and underground buildings.

Conclusion

Demolition activities would involve a temporary construction-industry workforce that would not exceed the current occupancy of the office buildings and would be subject to applicable fire protection, fire safety, and emergency access requirements. Therefore, demolition of the existing buildings would not increase demand for SFD services, facilities, or equipment such that new or physically altered fire protection facilities would be required. Through compliance with applicable fire and building codes, implementation of required fire protection features, and coordination with SFD during project review, future development would be adequately served by existing fire protection services. Therefore, impacts associated with demolition and future development would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.16-2: Increased Demand for Fire Flow

The proposed project consists of demolition of three existing state-owned office buildings. Demolition activities would comply with applicable fire safety, emergency access, and water supply requirements. Future uses would be required to implement permanent fire protection infrastructure and fire flow capacity, and the lead agency would review fire flow requirements and implement applicable 2025 California Fire Code and SFD measures regarding fire flow. Therefore, the project's impact related to increased demand for fire flow would be **less than significant**.

Demolition

During demolition, DGS and its contractor would maintain required emergency access and any temporary water supply or fire protection measures required for demolition would comply with applicable fire prevention and site safety requirements, including requirements of the California Fire Code, CBC, and State Fire Marshal.

Future Development

Future development of the site would include new occupied buildings, structured parking, utility connections, and other facilities that may require permanent fire protection infrastructure and fire flow capacity. SFD maintains oversight authority to ensure that adequate water volume and pressure are available in the department's service area. Methods to calculate minimum fire flow involve design specific calculations, including the density of structures, height, number of stories, square footage, building materials, and structural design. Fire protection infrastructure would be installed to serve the future uses and would meet current code. Occupancy of any structures would not be authorized until the provision of fire flows as required by the California Fire Code and any other regulations/codes/agencies with jurisdiction over the development has been confirmed.

Conclusion

Demolition activities would maintain required emergency access and would comply with applicable fire prevention, site safety, and water supply requirements during construction. Therefore, demolition of the existing buildings would not increase fire flow demand such that new or physically altered fire protection infrastructure would be required. Compliance with applicable fire protection standards and verification of adequate fire flow prior to occupancy would ensure that future development is served by appropriate fire protection infrastructure. Therefore, the project's impact related to increased demand for fire flow would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.16-3: Increased Demand for Law Enforcement Services, Facilities, and Equipment

The proposed project consists of demolition of three existing state-owned office buildings. Demolition activities would require temporary site security and would continue to be served by CHP CPS and SPD, as applicable, while the construction contractor would secure the demolition work areas. Future development of the site would result in an increase in the demand for police services, which could result in a need for additional police officers, support staff, and related facilities. However, because CHP and SPD share a concurrent jurisdictional relationship for this service area, existing police services would be adequate to serve the project. Therefore, the project's impact related to increased demand for law enforcement services, facilities, and equipment would be **less than significant**.

Demolition

The Capitol Mall Office Buildings Demolition Project would remove three existing state-owned office buildings. CHP CPS has jurisdictional responsibility for state-owned facilities in downtown Sacramento, including the project site, and SPD provides law enforcement services within the city. During demolition, CHP CPS and SPD would continue to respond to incidents as appropriate under existing jurisdictional and mutual response arrangements.

During demolition, security fencing and any other security measures may be installed as part of the demolition process to prevent public entry and would be retained to prevent unauthorized entry to the parcels. Because demolition would remove existing occupied buildings, it would not increase demand for law enforcement services or require new or expanded law enforcement facilities.

Future Development

Future development of the site would include approximately 3,630,000 gsf of academic, residential, hospitality, commercial, entertainment, parking, and supporting uses associated with a potential Downtown Sacramento campus of Sacramento State, as well as interim uses such as special events, surface parking, farmers markets, and temporary retail activities. At buildout, the project site is expected to accommodate approximately 5,960 employees, students,

and staff on a regular basis (see Table 4.16-2). In addition, the proposed retail, entertainment, arts, and event venue uses would attract visitors and event attendees, resulting in higher periodic site populations.

The increased number of students, employees, residents, visitors, and event attendees at the site would increase calls for law enforcement services related to traffic control, public safety, property protection, special events, and emergency response. The project site is located within downtown Sacramento, an urban area that is currently served by both CHP CPS for State facilities and SPD. For uses associated with a potential Downtown Sacramento campus of Sacramento State, increased demand for law enforcement services would be met, at least in part, through law enforcement personnel, facilities, and services provided by CSU as part of future campus operations. Future development would occur within an area that is already served by existing law enforcement infrastructure and emergency response networks. Although redevelopment would increase activity and population on the site, the addition of approximately 3,630,000 gsf of mixed uses would not require the construction of a new police station or other law enforcement facility, though it is likely that CSU law enforcement facilities and personnel would be established onsite. Furthermore, development of the site would incorporate site access, circulation, lighting, visibility, and security features consistent with applicable building, fire, and public safety requirements, which would facilitate effective law enforcement response and service. Therefore, future development would not result in the need for new or physically altered law enforcement facilities beyond those that may be incorporated into the project itself.

Conclusion

Because demolition activities would remove existing buildings, maintain site security measures, and would not introduce a new permanent population or use, demolition would not substantially increase demand for law enforcement services. Although future development would increase calls for law enforcement services by introducing new students, employees, residents, visitors, and event attendees, development of future uses would occur within an urban area already served by existing law enforcement infrastructure and emergency response networks. Furthermore, future development is expected to include CSU law enforcement facilities and personnel, and would incorporate site design and safety features that facilitate law enforcement access and response. Therefore, neither demolition nor the reasonably foreseeable future development of the site would result in the need for new or physically altered law enforcement facilities, and impacts would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.16-4: Increased Demand for School Services

The proposed project consists of demolition of three existing state-owned office buildings. Demolition would not introduce new residents, students, employees, or visitors that would increase demand for schools. Temporary demolition activities would occur within the project site and would not require closure or alteration of nearby schools. Future development would include 1,250 housing units, 500 student housing units and 750 market-rate apartment units. For the purposes of this analysis, 150 units are estimated to be multi-bedroom units capable of accommodating families with school-aged children. As a result, the project would generate approximately 40 students within SCUSD and would not increase enrollment sufficiently to require new or expanded school facilities. Therefore, impacts related to the provision of school facilities would be **less than significant**.

Demolition

The Capitol Mall Office Buildings Demolition Project would remove three existing state-owned office buildings. During demolition, construction-industry workers would be temporarily present at the site; however, this workforce would not represent a permanent population increase or generate additional student enrollment at nearby schools. Demolition activities would be confined to the project site and would not require closure, expansion, or modification of existing school facilities.

Future Development

During the phase after demolition and before future development, portions of the site that remain undeveloped may accommodate interim uses, which could include special events, concerts, farmers markets, pop-up retail markets, shipping-container-based retail and food vendor markets, and similar temporary activities. These interim uses would not include residential development and would not generate additional student enrollment at nearby schools.

The proposed academic facilities would serve university students rather than K–12 students and, therefore, would not directly increase enrollment in local public elementary or secondary schools. However, the market-rate residential component could generate school-age children that would be served by schools within SCUSD. The market-rate residential component could generate a limited number of school-age children that would be served by schools within SCUSD.

Future residential development would include 500 student housing units and 750 market-rate units. While the market-rate unit configuration is yet to be determined, for the purposes of this analysis it is estimated that up to 150 units among the 1,250 total housing units would be multi-bedroom units that would accommodate families with children. The estimated number of students at buildout of residential land uses is shown in Table 4.16-3. Because the student housing units are intended for college students and the market-rate apartments would consist primarily of studio and one-bedroom apartments, only a limited number of school-age children would be expected to reside on the project site. Based on applicable student-generation rates, the 150 multi-bedroom units would generate an estimated 40 K-12 students.

Table 4.16-3 Student Generation

Type of School	Multi-family Generation Rate[1]	Number of Multi-bedroom Units[2]	Number of Students
Elementary school (grades K–5)	0.19	150 apartments	29
Middle school (grades 6–8)	0.03	150 apartments	5
High school (grades 9–12)	0.04	150 apartments	6
Total	—	—	**40**

[1] Student generation rates are from the Sacramento 2040 General Plan EIR.

[2] Among the 500 student housing units and 750 market-rate residential apartment units, it is assumed for this analysis that approximately 150 units would be multi-bedroom units that would accommodate families with children.

Source: Compiled by Ascent in 2026.

William Land Elementary School, Miwok Middle School, and C.K. McClatchy High School currently serve the project area. As shown in Table 4.16-1, William Land Elementary School has available capacity, while Miwok Middle School and C.K. McClatchy High School are at or slightly above identified capacity. The project would generate approximately 29 elementary school students, five middle school student, and six high school students. This small increase in enrollment would not be sufficient to require construction of new or physically altered school facilities to accommodate the additional students. Any students generated by the project would be accommodated through SCUSD enrollment assignment procedures, districtwide capacity management, and future facilities planning.

Future development would include academic facilities associated with a potential Downtown Sacramento campus of Sacramento State. Implementation of the project would involve construction of new educational facilities; however, the environmental effects associated with construction and operation of those facilities are evaluated throughout this EIR in the applicable environmental resource sections. Therefore, construction of academic facilities would not result in public service impacts beyond those addressed elsewhere in this EIR.

As a State-sponsored action, the project would be exempt from otherwise applicable school impact fees. Based on the estimated generation of approximately 10 K–12 students, the project would result in a relatively small increase in student enrollment, future development would not require new or physically altered school facilities that could result in significant environmental impacts.

Conclusion

Because demolition activities would be temporary, would not generate additional student enrollment, and would not increase demand for school facilities or services, demolition would not affect existing schools or require the construction or expansion of school facilities. Accordingly, demolition-related impacts would be less than significant.

Future development could result in a modest increase in K-12 students through the introduction of new residents. The academic facilities would primarily serve higher education students and would not directly increase enrollment in local K–12 schools. The residential component would consist primarily of student housing and studio and one-bedroom apartments. However, for the purposes of this analysis, it was assumed that 150 units would be multi-bedroom units that would accommodate families with children. Based on applicable student-generation rates, the project would generate approximately 40 K-12 students. This small increase in enrollment would not require the construction of new or physically altered school facilities.

Any new students generated would be accommodated through SCUSD enrollment assignment procedures, districtwide capacity management, and future facilities planning. Accordingly, the project's impact related to increased demand for school services would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.16-5: Increased Demand for Recreational Facilities

The proposed project consists of demolition of three existing state-owned office buildings. Demolition would not introduce new residents, students, employees, or visitors that would increase use of existing parks or recreational facilities. Temporary demolition activities would occur within the project site and would not require closure or alteration of nearby public parks. Future development is expected to accommodate approximately 5,960 employees, students, and staff on a regular basis, which could increase use of nearby parks. The increase in park use would not substantially increase above the current level of use. Because construction or expansion of existing parks and recreational facilities would not be necessary as a result of this incremental increase in park/recreational facility use, impacts related to recreational facilities would be **less than significant**.

Demolition

The Capitol Mall Office Buildings Demolition Project would remove three existing state-owned office buildings. During demolition, construction workers would be temporarily present at the site; however, this workforce would not represent a permanent population increase and would not substantially increase use of nearby parks such as Leland Stanford Mansion State Historic Park, Capitol Park, Roosevelt Park, or Cesar Chavez Plaza. Demolition activities would be confined to the project site and would not include recreational facilities, require construction or expansion of recreational facilities, or require long-term closure of existing neighborhood or regional parks.

Future Development

Future development of the site could generate new demand for parks, open space, or recreational facilities. The conceptual redevelopment could include approximately 500 student housing units; approximately 750 market-rate apartments; academic facilities serving approximately 5,000 students, faculty, and staff; hotel accommodations; retail uses; a conference and event center; an indoor performing arts and music venue; and associated parking and public spaces. Future development could include private open space, campus gathering areas, and recreational amenities associated with residential, hospitality, and academic uses. These amenities would primarily serve future residents, students, employees, and visitors associated with the project and would reduce demand for nearby public recreational facilities.

During the phase after demolition and before future development, portions of the site that remain undeveloped may accommodate interim uses, which could include special events, concerts, farmers markets, pop-up retail markets, shipping-container-based retail and food vendor markets, and similar temporary activities.

Future development would increase demand for parks, open space, and recreational opportunities through the introduction of approximately 2,750 residents; 5,960 employees, students, and staff; and additional visitors and event attendees. The project site is located within downtown Sacramento in close proximity to Capitol Park, Cesar Chavez Plaza, Roosevelt Park, the Sacramento River Parkway, and other existing public parks and recreational resources.

While future development would increase use of nearby parks and recreational resources, the project would not include or require construction of new public parks or recreational facilities. The increase in demand would be distributed among numerous existing parks and recreational resources in the downtown area and would not be expected to substantially accelerate physical deterioration of existing facilities.

Conclusion

Demolition activities would be temporary, would occur entirely within the project site, and would not require closure, expansion, or alteration of existing parks or recreational facilities. Accordingly, demolition-related impacts would be less than significant. Future development could include residential, commercial, hospitality, entertainment, and mixed-use development which could increase demand for recreational facilities through the introduction of new students, residents, employees, and visitors. The project site is located within an urbanized area that is already served by numerous existing parks and recreational resources. Although future development would increase recreational demand, the project would not require construction or expansion of public recreational facilities. Accordingly, the project's impact related to increased demand for recreational facilities would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

4.17 AESTHETICS, LIGHT, AND GLARE

This section provides a description of existing visual conditions, meaning the physical features that make up the visible landscape, near the Capitol Mall Office Buildings Demolition Project site and an assessment of changes to those conditions that would occur from project implementation. The effects of the project on the visual environment are generally defined in terms of the project's physical characteristics and potential visibility, the extent to which the project's implementation would change the perceived visual character and quality of the environment, and the expected level of sensitivity that the viewing public may have where the project would alter existing views. The "Methodology" discussion below provides further detail on the approach used in this evaluation.

No comments regarding aesthetics, light, or glare were received in response to the Notice of Preparation (see Appendix A).

4.17.1 Regulatory Setting

FEDERAL

No federal plans, policies, regulations, or laws related to aesthetics, light, and glare are applicable to the Capitol Mall Office Buildings Demolition Project.

STATE

Capitol Area Plan

The 1997 Capitol Area Plan (CAP) serves as the master plan for development of State-owned land within the Capitol Area. A few of the statutory objectives and related principles that form the basis of the CAP both directly and indirectly address design objectives and aesthetic issues, as follows:

- **Land Use.** To establish patterns of land use in the Capitol Area which are responsive to the goals of the Capitol Area Plan, which provide for flexibility in meeting future State needs, and which protect the State's long-term interest without inhibiting the development process.
  - **Principle 3:** Consider transit accessibility, protection of the State Capitol Building's prominence, and linkage to surrounding neighborhoods in the location, intensity, and design of development.
- **State Offices.** To provide offices and related services to meet present and future space requirements for the State of California near the State Capitol and in the context of metropolitan Sacramento, in the most effective manner.
  - **Principle 3:** Ensure that building massing for office development enhances the Capitol Area's urban character, respects and maintains the State Capitol Building and Capitol Park as the focus of the Capitol Area, and provides adequate transition to the surrounding neighborhoods.
  - **Principle 5:** Intensify office space use on underutilized sites or in aging State facilities through renovation of existing buildings or through redevelopment.
- **Open Space and Public Amenities.** To develop within the Capitol Area a network of attractive and convenient open spaces and access routes to improve the environment for workers, residents and visitors, and to encourage a favorable response to alternatives for moving within and using the resources of the Capitol Area.
  - **Principle 2:** Incorporate open space features into new office facilities and housing developments.
  - **Principle 4:** Ensure a streetscape that enhances the Capitol Area's identity and sense of place, is responsive to the needs of pedestrians and the requirements of adjacent activities, and orients visitors to destinations and services within the Capitol Area. Chapter 11 of the 1997 Capitol Area Plan includes a set of "Urban Design

> Guidelines," which are broadly intended to… promote the Capitol Area's identity, vitality, and sense of place, and foster an environment that is conducive to living, working, and visiting. The relationship between buildings and streets, pedestrian shade and comfort, visitor orientation, and safety are all important components of neighborhood building.

The following Urban Design Guidelines included in the CAP do not represent commitments to specific design solutions, nor are they implementing actions. These guidelines outline an advisory framework to guide the character and quality of the urban environment. They are intended as suggestions to be used by architects, site planners, and developers for development of specific sites (DGS 1997). The Urban Design Guidelines are as follows:

- **Guideline 1:** Maintain the State Capitol Building as the focus of the Capitol Area.
- **Guideline 2:** Ensure that all development complies with the stipulations of the Capitol View Protection Act.
- **Guideline 3:** Promote mixed-use development.
- **Guideline 4:** Maintain building intensities that are appropriate to the role of the Capitol Area and its setting.
- **Guideline 5:** Promote harmony between the old and the new.
- **Guideline 6:** Promote development that is pedestrian-friendly and has a neighborhood orientation.
- **Guideline 7:** Facilitate building identification and visitor orientation through a comprehensive signage program.
- **Guideline 8:** Promote streetscapes that further the Capitol Area's identity and promote pedestrian comfort and safety.

Capitol View Protection Act

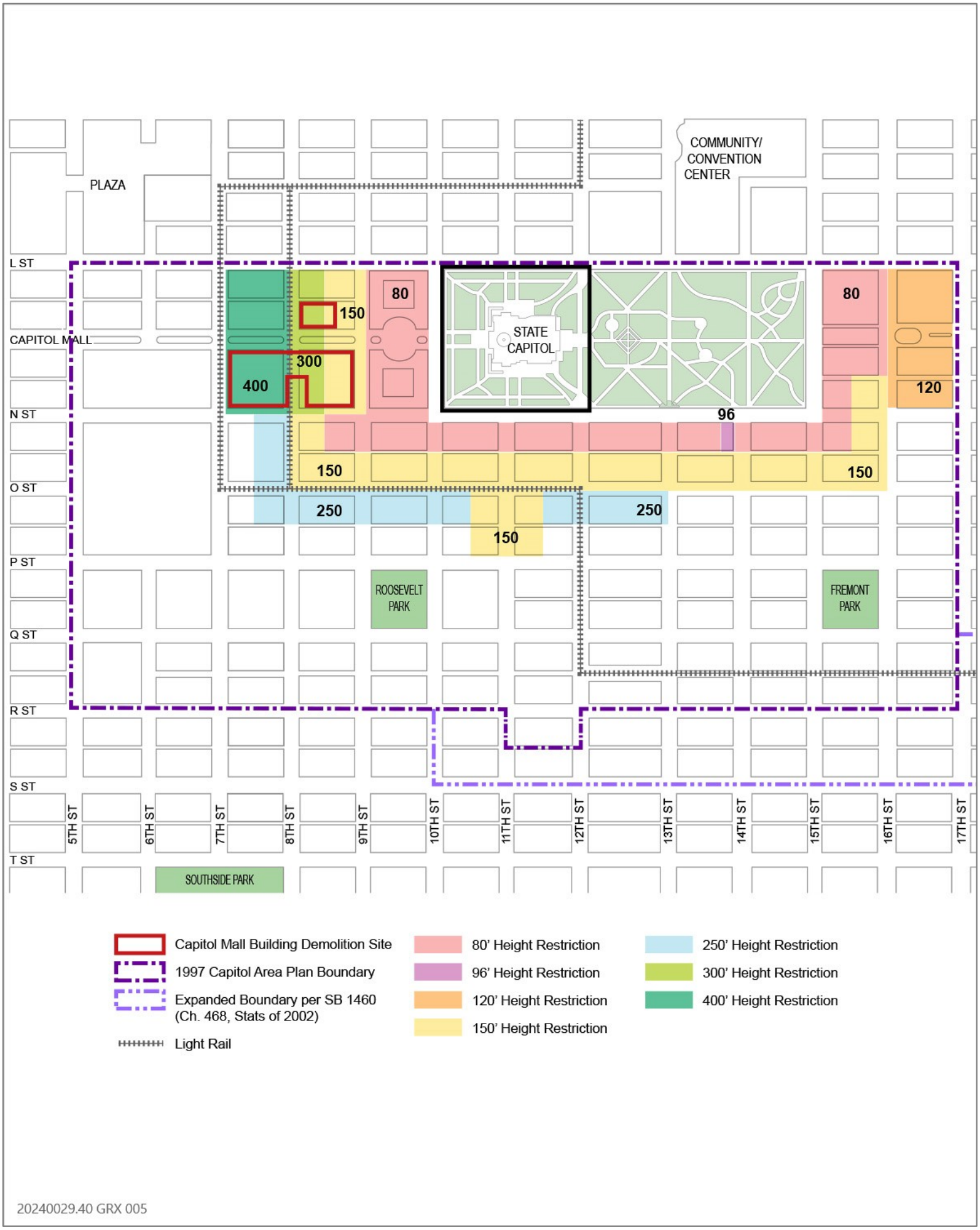
The Capitol View Protection Act (Government Code Section 8162 et seq.) was enacted in 1992 to maintain the visual prominence of the State Capitol by setting height restrictions in zones surrounding the Capitol building (Figure 4.17-1), and to maintain the existing urban edge of surrounding streets by requiring certain building setbacks (California Office of Historic Preservation 2005). The Capitol View Protection Act identifies a height restriction of 150 feet for the eastern portions of the State Personnel Board Building and the Employment Development Department (EDD) Headquarters on the 800 block of Capitol Mall, 300 feet for the western portions of the State Personnel Board Building and EDD Headquarters on the 800 block of Capitol Mall, and 400 feet for the western portion of the EDD Headquarters on the 700 block of Capitol Mall and the EDD "Solar Building" Annex (Figure 4.17-1).

California Green Building Standards Code

The California Green Building Standards Code (CALGreen) is Part 11 of the California Buildings Standards Code and is the first statewide green building code in the United States. The purpose of CALGreen is to improve public health, safety, and general welfare by enhancing the design and construction of buildings using building concepts that have a positive environmental impact and encouraging sustainable construction practices. The provisions of the code apply to State-owned buildings, among others. The 2025 version of CALGreen includes mandatory standards to reduce light pollution for nonresidential projects (CBSC 2025). The provisions of the code include maximum allowable backlight, uplight, and glare ratings intended to minimize light pollution to maintain dark skies and to ensure that newly constructed projects reduce the amount of backlight, uplight, light, and glare from exterior sources.

California Scenic Highway Program

The California Department of Transportation manages the California Scenic Highway Program. The goal of the program is to preserve and protect scenic highway corridors from changes that would affect the aesthetic value of the land adjacent to the highways. The highway closest to the project site that is designated scenic is State Route (SR) 160. SR 160 parallels the Sacramento River and is designated scenic between the Contra Costa/Sacramento County line and the south city-limit line for the city of Sacramento. The north terminus of the segment of the highway that is designated scenic is more than 7 miles from the project site, and the site is not visible from this location. No other State-designated scenic highways are near the project site (Caltrans 2026).



Source: Adapted by Ascent in 2026.

Figure 4.17-1 Capitol View Protection Act Height Restrictions

Senate Bill 743

The California Legislature adopted a CEQA streamlining bill, SB 743, for residential, mixed-use residential, or employment center projects on infill sites within transit priority areas (PRC Section 21099[d]). As explained in Section 4.4, "Transportation and Circulation," of this Draft EIR, the project is within a transit priority area, and it qualifies for CEQA streamlining benefits provided by SB 743. As a qualifying project, SB 743 provides that neither the project's aesthetic impacts nor parking impacts shall be considered significant impacts on the environment (PRC Section 21099[d][1]).

LOCAL

The buildings on the project site are located on State-owned property and would be demolished by the Department of General Services (DGS) and subsequent development is presumed to be undertaken by the California State University, Sacramento (Sacramento State), another State agency. As explained in Section 4.2, "Land Use and Planning," of this Draft EIR, under Section 4.2.1, "Local," state agencies are not subject to local plans, policies, and zoning regulations. Nevertheless, in the exercise of its discretion, DGS does reference, describe, and address local plans, policies, and regulations in its evaluation of the project. This evaluation is also intended to be used by local agencies for determining, as part of their permit processes, the project's consistency with local plans, policies, and regulations.

City of Sacramento 2040 General Plan

The following policies from the Land Use and Placemaking Element and Environmental Resources and Constraints Elements of the City of Sacramento 2040 General Plan (2040 General Plan) may be relevant to the analysis of aesthetics, light, and glare effects:

- **Policy LUP-4.6: Compatibility with Adjoining Uses.** The City shall ensure that the introduction of higher-intensity mixed-use development along major arterial corridors is compatible with adjacent land uses, particularly residential uses, by requiring features such as the following:
  - Buildings set back from rear or side yard property lines adjoining single-unit dwelling residential uses;
  - Building heights stepped back from sensitive adjoining uses to maintain appropriate transitions in scale and to minimize impacts to privacy and solar access;
  - Landscaped off-street parking areas, loading areas, and service areas screened from adjacent residential areas to the degree feasible; or
  - Lighting shielded from view and directed downward to minimize impacts on adjacent residential uses.
- **Policy LUP-4.7: Visual and Physical Character.** Using development standards and design standards/guidelines, the City shall promote development patterns and streetscape improvements that transform the visual and physical character of automobile-oriented corridors to create a positive impact on the human and natural systems that interact with them.
- **Policy LUP-8.1: Unique Sense of Place.** The City shall promote quality site, architectural, and landscape design that include the following:
  - Connected walkable blocks;
  - Distinctive parks and accessible open spaces;
  - Tree-lined streets; and
  - Varied architectural styles.
- **Policy LUP-8.7: Distinctive Urban Skyline.** The City shall guide development of a distinctive urban skyline that reflects the vision of Sacramento with a prominent central core containing the city's tallest buildings, complemented by smaller-scale urban centers and corridors with mid- and high-rise development.

- **Policy LUP-8.13: Continuity of Streetscape Design.** The City shall encourage continuity in streetscape/landscape design especially along major streets and avenues that traverse the city north to south and east to west.
- **Policy ERC-3.2: Tree Canopy Expansion.** The City should strive to achieve a 25 percent urban tree canopy cover by 2030 and 35 percent by 2045. Prioritize tree planting and tree maintenance in areas with the lowest average canopy cover and explore strategies to reduce barriers to tree planting in disadvantaged communities and improve tree health.
- **Policy ERC-3.3: Tree Protection.** The City shall encourage public agencies and require private development projects to consider alternatives to removals of healthy trees whenever feasible and to evaluate the longer-term consequences of the inability to meet tree canopy objectives when conducting project analyses and environmental documents. Ensure adequate protections during construction to protect existing tree roots and structure.

Central City Community Plan

The Capitol Mall Office Buildings Demolition project site is located within the Central Business District portion of the Central City Community Plan as designated in the 2040 General Plan (City of Sacramento 2024). The Central City Community Plan, which is intended to supplement the citywide policies above, includes the following relevant policies:

- **CC-LUP-1: Central Business District.** The City shall strengthen the role of the Central City as the regional center of the greater Sacramento area for living, commerce, culture, and government

Sacramento Central City Urban Design Guidelines

The City has design guidelines for each design review district within the city. The guidelines are used by the City's Design Review and Preservation Board to integrate projects with the appearance, scale, capacity, and character of various neighborhoods or districts in the city. The Capitol Mall Office Buildings Demolition Project is located in the Central Business District and the Central Core Design Guidelines Area (City of Sacramento 2018). These guidelines convey the City's expectations for design excellence in the Central City.

The Central Core District Design Guidelines sets forth a long- term vision for the physical form and character of Sacramento's downtown and a comprehensive set of design guidelines for developing downtown Sacramento to its fullest potential. The intent is to ensure that all development in the Central Core contributes to making downtown Sacramento a unique and special place, and furthers Sacramento's aspiration to be "America's Most Livable City" (City of Sacramento 2018).

4.17.2 Environmental Setting

VISUAL CHARACTER OF THE PROJECT SITE

Figure 4.17-2 shows the location of views of the project site and surrounding areas that correspond to Figures 4.17-3 through 4.17-7.

The Capitol Mall Office Buildings Demolition Project consists of three state-owned office buildings, the EDD Headquarters Building, the EDD Solar Building Annex, and the State Personnel Board Building. The EDD Headquarters Building is bounded by Capitol Mall to the north, 8th Street to the east, N Street to the south, and 7th Street to the west. The EDD Solar Building Annex is bounded by Capitol Mall to the north, 9th Street to the east, N Street to the south, and 7th Street to the west. The EDD Headquarters Building has structures on both the 700 and 800 block, sharing the same block as the EDD Solar Building Annex. The State Personnel Board Building is bounded by L Street and L Street Capitol Mall Alley to the north, 9th Street to the east, Capitol Mall to the south, and 7th Street to the west.

The EDD Headquarters Building connects two structures on adjacent blocks via a skybridge. The EDD Headquarters Building includes multi-story concrete structures with rows of large windows at each floor and is largely painted in taupe and cream, with the northern facade of the structures, facing Capitol Mall, painted with pale green and rust as well. The EDD Solar Building Annex is located on the same 700 block that contains one of the EDD Headquarters structures. The EDD Solar Building Annex is a multi-story concrete structure with rows of large windows on the

southern façade facing N Street. The southern façade is slanted upward, with horizontal sunshade panels running across each level of the building. Sidewalks and landscaping strips with shrubs and mature trees border the perimeter of the EDD Headquarters Building and the EDD Solar Building Annex. Street parking is provided along N Street. The length of 7th Street and 8th Street have overhead lines serving the Regional Transit light rail line.

The State Personnel Board Building is a multi-story concrete structure with rows of large windows at each floor and is largely painted in taupe and cream, with the western facade of the structure, facing 8th Street, painted with pale green and rust as well. Sidewalks and landscaping strips with shrubs and mature trees border the State Personnel Board Building and run along the perimeter of the entire block. Street parking is provided along 8th Street. The length of 8th Street has an overhead line serving the Regional Transit light rail line.

The existing visual conditions of the project site and surrounding area are shown in Figures 4.17-3 through 4.17-7.

VISUAL CHARACTER OF THE SURROUNDING AREA

Buildings surrounding the project site include the Department of Rehabilitation on the block north of the EDD Headquarters Building, across Capitol Mall, and west of the State Personnel Building; a residential mixed-use building north of the State Personnel Building across L Street Capitol Mall Alley; the Sutter Club directly east of the State Personnel Board Building, located on the same block of the State Personnel Board Building; the California State Library on the block southeast of the EDD Headquarters Building, across 9th Street; Leland Standford Mansion and the State Resources Building on the block south of the EDD Headquarters Building across N Street; the EDD Annex "Subterranean Building" and Growing Mindfully pre-school on the block south of the EDD Solar Building Annex, across N Street; and the John E. Moss Federal Building on the block west of the EDD Solar Building, across 7th Street.

As described above, a mix of low-rise, mid-rise, and high-rise buildings surround the project site. For the purposes of this analysis, low-rise buildings are considered to include those that stand from one to four stories above ground level; mid-rise buildings include those that stand five to 12 stories above ground level; and high-rise buildings include those that stand 13 or more stories above ground. The tallest nearby building—the U.S. Bank Tower—stands at 25 stories and is located northwest of the EDD Solar Building Annex, on the corner of 7th Street and Capitol Mall. Streets are generally framed by buildings and mature ornamental trees. Most buildings have minimum setbacks from the street.

VIEWS OF THE PROJECT SITE AND SURROUNDING AREA

Figure 4.17-3, which contains Viewpoint 1 and 2, displays a view of the western (primary) façade of the Capitol building, looking east, as well as a view of the Capitol Mall Corridor looking west. The viewpoints show the State Personnel Board Building and the EDD Headquarters along the corridor with mature trees lining the fronts of the buildings.

Figure 4.17-4 contains Viewpoint 3 and 4. Viewpoint 3 shows a view of the Capitol Mall Corridor looking west, with buildings and mature trees lining the edges of the corridor. Viewpoint 4 displays a southwestern view of the EDD Headquarters northern façade from Capitol Mall, with mature trees lining the front of the building.

Figure 4.17-5 contains Viewpoint 5 and 6. Viewpoint 5 displays a southeastern view of the EDD Headquarters northern façade from Capitol Mall, with mature trees lining the front of the building. Viewpoint 6 displays a northwestern view of the EDD "Solar Building" Annex in the midground, from the courtyard of the EDD Annex "Subterranean Building."

Figure 4.17-6 contains Viewpoint 7 and 8. Viewpoint 7 displays a direct northern view of the EDD "Solar Building" Annex southern façade from N Street. Viewpoint 8 displays a northeastern view of the southern façade of the EDD Headquarters Building, with mature trees surrounding the building's parking lot.

Figure 4.17-7 contains Viewpoint 9 and 10. Viewpoint 9 displays a northeastern view of the State Personnel Board Building's western façade, with the State Capitol in the background. The viewpoint shows mature trees surrounding the building and Capitol Mall corridor. Viewpoint 10 displays an additional northeastern view of the State Personnel Board Building, showing the building's southern façade.

LIGHT AND GLARE CONDITIONS

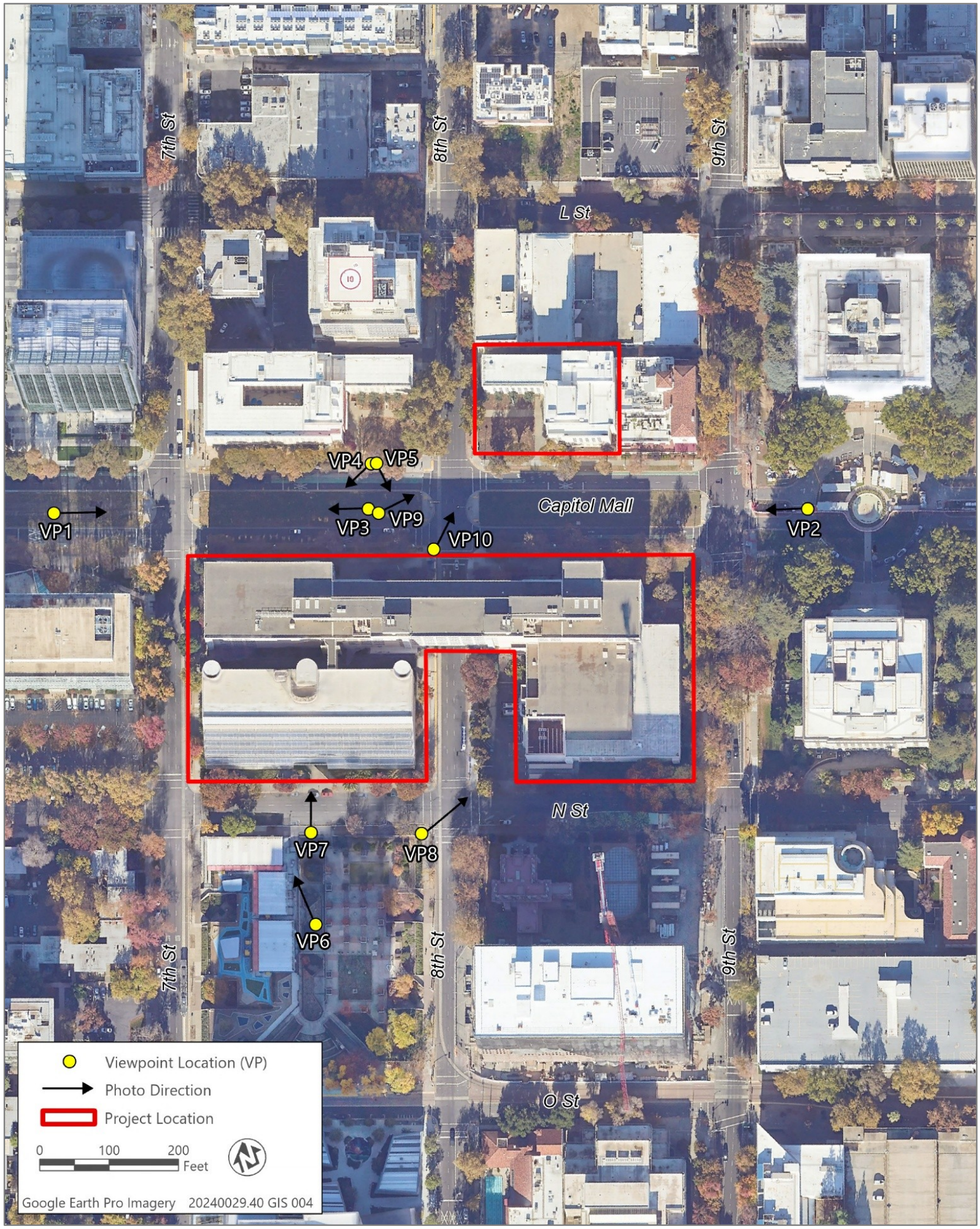
Existing sources of light and glare are uniformly present in the project vicinity. Existing sources of light include streetlights along project roadways; lights in parking lots, along walkways, and on the exteriors of buildings; lights associated with the light rail system; and interior lights in buildings.

Natural and artificial light reflect off various surfaces and can create localized occurrences of daytime and nighttime glare. Buildings and structures made with glass, metal, and polished exterior roofing materials exist throughout the Capitol Area; however, there are no reported occurrences of excessive daytime or nighttime glare in the project vicinity.

SHADOWS

The evaluation of shading and shadows in this Draft EIR is limited to daytime shadows cast by objects blocking sunlight. The angle of the sun, and hence the character of shadows, varies depending on the time of year and the time of day; however, in the Northern Hemisphere, the sun always arcs across the southern portion of the sky. During the winter, the sun is lower in the southern sky, casting longer shadows compared to other times of year. During the summer months, the sun is higher in the southern sky, resulting in shorter shadows. During the summer, the sun can be almost directly overhead at midday, resulting in almost no shadow being cast. During all seasons, as the sun rises in the east in the morning, shadows are cast to the west; at mid-day, the sun is at its highest point and shadows are their shortest, and cast to the north; and as the sun sets in the west in the afternoon/evening, shadows are cast to the east. Because of the climate in the Sacramento area, midday and afternoon shade in summer can be beneficial. In the winter, however, access to sunlight can be beneficial.

Tall buildings are common in downtown Sacramento and frequently cast substantial shadows for a portion of the day. The numerous street trees and interior trees in the area also provide a substantial source of shade and shadow, which is considered an amenity during the Sacramento area's hot summers. There are few areas in downtown Sacramento that are not shaded during at least part of the day.



Source: Adapted by Ascent in 2026.

Figure 4.17-2 Viewpoints of Existing Conditions Photographs



Source: Photograph taken by Ascent in 2026.

Viewpoint 1: View of the State Capitol Looking East from the Center of 6th Street and 7th Streets



Source: Photograph taken by Ascent in 2026.

Viewpoint 2: View of the Capitol Mall Corridor Looking West from the Center of 9th and 10th Streets

Figure 4.17-3 Existing Visual Conditions of the Project Site - Representative Photographs



Source: Photograph taken by Ascent in 2026.

Viewpoint 3: View of the Capitol Mall Corridor Looking West from the Center of 7th and 8th Streets



Source: Photograph taken by Ascent in 2026.

Viewpoint 4: View of the EDD Headquarters Building Looking Southwest from Capitol Mall

Figure 4.17-4 Existing Visual Conditions of the Project Site - Representative Photographs



Source: Photograph taken by Ascent in 2026.

Viewpoint 5: View of the EDD Headquarters Looking Southeast from Capitol Mall



Source: Photograph taken by Ascent in 2026.

Viewpoint 6: View of the EDD "Solar Building" Annex Looking Northwest from the 750 N Street (Subterranean Building) Courtyard

Figure 4.17-5 Existing Visual Conditions of the Project Site - Representative Photographs



Source: Photograph taken by Ascent in 2026.

Viewpoint 7: View of the EDD "Solar Building" Annex Looking North from N Street



Source: Photograph taken by Ascent in 2026.

Viewpoint 8: View of the EDD Headquarters Building Looking Northeast from 8th and N Streets

Figure 4.17-6 Existing Visual Conditions of the Project Site - Representative Photographs



Source: Photograph taken by Ascent in 2026.

Viewpoint 9: View of the State Personnel Board Building Looking Northeast from the Center of 7th and 8th Streets



Source: Photograph taken by Ascent in 2026.

Viewpoint 10: View of the State Personnel Board Building Looking Northeast from Capitol Mall and 8th Street

Figure 4.17-7 Existing Visual Conditions of the Project Site - Representative Photographs

4.17.3 Environmental Impacts and Mitigation Measures

METHODOLOGY

The method used for this assessment of impacts on aesthetics, light, and glare is adapted from guidelines prepared by the Federal Highway Administration (2015) for assessing visual impacts associated with transportation projects; these guidelines are easily transferred to other types of projects that could alter existing landscapes. The process of describing and evaluating visual resources near the Capitol Mall Office Buildings Demolition Project site and the surrounding areas involves the following steps:

- identify the visual features or resources that comprise and define the visual character of the viewsheds (A viewshed is a physiographic area composed of land, water, biotic, and cultural elements that may be viewed and mapped from one or more viewpoints and that has inherent scenic qualities and/or aesthetic values as determined by those who view it.);
- assess the quality of the identified visual resources relative to overall regional visual character;
- identify major viewer groups and describe viewer exposure; and
- identify viewer sensitivity, or the relative importance of views to people who are members of the viewing public.

The area of potential visual impacts for the Capitol Mall Office Buildings Demolition Project is limited to downtown Sacramento areas west of the State Capitol. Elements considered when evaluating the general visual quality and character of the downtown Sacramento area include commercial buildings, office buildings, residences, parking lots, streets, and other structures; trees and landscaping; public outdoor spaces such as parks and plazas; and views of the State Capitol and Capitol Park.

Viewer exposure refers to the location of viewer groups, the number of viewers, and the frequency and duration of views. Viewer sensitivity varies depending on the characteristics and preferences of the viewer group. An assessment of viewer sensitivity can be made based on the extent of the public's concern for a particular landscape or for scenic quality in general. Viewer sensitivity differs among various groups of people in the project vicinity. For this analysis, visual sensitivity of viewers is generally rated moderate in most portions of the visual impact area (i.e., the vicinity of city blocks or properties where project facilities could be located) for the reasons discussed below. Given the mix of office, commercial, and residential uses in downtown Sacramento, the viewer group considered in this DEIR is comprised of commuters, office-workers, pedestrians (tourists), and residents/homeowners.

It is estimated that many viewers who would move through the local visual study area (i.e., the Capitol Area as defined above and shown on Figure 4.17-1) are commuters who acquire only fleeting views of the surrounding neighborhoods, and whose focus is on their travels. This group is considered to have a low visual sensitivity. Although this viewer group has frequent exposure to views of elements within the project study-area viewsheds, viewer sensitivity tends to be somewhat lower for people driving to and from work or as part of their work environment.

Viewer sensitivity for office workers with daily fixed views of portions of the local visual study area is generally considered to be moderate. The members of this group may have extended and repeated views of their surroundings on a daily basis, but would generally have lower expectations for visual elements because they are in a work environment rather than at home or in a recreational area.

Viewer sensitivity for pedestrians who are viewing portions of the visual study area at the street level is generally expected to be high because of the location of foreground visual elements along city streets, and because some in this viewer group are likely to be tourists focused on the cultural environment around them. Viewer sensitivity for homeowners or other local residents would also be high for the viewshed near their homes. Some local residents, including those who occupy the Capitol Towers residences located southwest of the project site and across 7th Street, would have elevated views of elements of the proposed project.

THRESHOLDS OF SIGNIFICANCE

An impact on aesthetics, light, and glare is considered significant if implementation of the Capitol Mall Office Buildings Demolition Project would do any of the following:

- have a substantial adverse effect on a scenic vista;
- substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;
- substantially degrade the existing visual character or quality of public views of the site and its surroundings;
- would conflict with applicable zoning and other regulations governing scenic quality; or
- create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

ISSUES NOT DISCUSSED FURTHER

The project site is not located near a designated scenic highway corridor. As previously described, a portion of SR 160 between the Contra Costa/Sacramento County line and the Sacramento city limit line is a designated scenic route. The north terminus of the highway segment that is designated scenic is more than 7 miles from the project site, and the project site cannot be seen from this location. At this distance, the upper floors of taller buildings in the downtown Sacramento area may be visible from limited vantage points and would indicate the center of urban development in the region. However, an alteration of the skyline at this distance would be unremarkable. Therefore, the project would not substantially damage scenic resources visible from a designated scenic highway and this issue is not discussed further in this EIR.

Abatement of the first building is anticipated to begin in fall 2027. However, prior to fall 2027, activities may occur inside the project buildings and in the project vicinity, such as disconnecting and reconnecting some utility services, to ready the project site and vicinity for abatement, demolition, and re-routing of utilities. During this period, neighboring businesses and residences may be exposed to views of staged construction equipment and materials and temporary construction fencing. No staging areas have been identified at this time. However, an existing parking area associated with the EDD Headquarters Building in the southwest corner of the block bounded by Capitol Mall, 8th Street, 9th Street, and N Street may be used to support activities prior to abatement. In addition, vacant office space in the Subterranean Building, directly across N Street from the Solar Building, could be made available for project offices. Temporary views of construction activity are common in an urban setting and do not constitute an adverse change in the permanent visual character of the environment. Therefore, minor activities inside the project buildings and in the vicinity of the project site prior to initiating abatement would not substantially degrade the existing visual character or quality of the site and its surroundings, and this issue is not discussed further in this EIR.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 4.17-1: Adverse Effect on a Scenic Vista

The Capitol Mall corridor is considered a scenic vista. Implementation of the Capitol Mall Office Buildings Demolition Project would require substantial demolition and future construction activities, which would temporarily alter views of the northern and southern edges of the Capitol Mall corridor. Because demolition and construction activities would be temporary, these activities would not result in a permanent adverse effect. However, future development would result in a permanent alteration of the corridor. Future development would be consistent with the surrounding downtown area and existing uses along the Capitol Mall corridor. Additionally, future development would be required to comply with the Capitol View Protection Act to maintain the visual prominence of the State Capitol. Thus, this impact would be **less than significant**.

The east-facing view of Capitol Mall toward the State Capitol is considered a protected view and vista (DGS 1997). Implementation of the proposed project would require demolition of three existing state-owned office buildings and future development of the site.

Demolition

During demolition activities, east-facing views of Capitol Mall towards the State Capitol would be temporarily altered. While it is not known at this time the order in which the buildings would be demolished, demolition of the buildings would be sequenced, with demolition beginning after abatement of hazardous materials is completed. It is anticipated that the abatement and demolition of all three buildings would occur over an 18-month period. Temporary fencing would be installed to prevent unauthorized access and promote site safety surrounding the demolition area, as well as to shield views from the public. Once abatement and demolition activities are completed, fencing would be retained for security and safety purposes until future development occurs. As discussed above, temporary views of construction-related projects are common in an urban setting and do not constitute an adverse change in the permanent visual environment. As a result, temporary views associated with demolition would not be unusual for the surrounding area. Because demolition activities would be temporary, occur in sequenced phases, and would be consistent with activities often found in the surrounding area, demolition of the three state-owned office buildings would not result in permanent impacts on the long-distance views of the Historic Capitol and Capitol Mall. Future development is expected to occur within a year or less of the completion of project demolition. Therefore, although the absence of the three existing building and the presence of security fencing would alter the views along Capitol Mall, this alteration would be temporary and views of the State Capitol from Capitol Mall would not be obstructed. The demolition phase of the proposed project would not have a substantial adverse effect on the Capitol Mall scenic vista.

Future Development

Future development of the project site includes a mix of academic, residential, hospitality, commercial, entertainment, parking, and related uses with a total development program anticipated to comprise approximately 3,630,000 gross square feet (GSF) at full buildout. Construction activities associated with the land use types being considered would occur in multiple phases over time. Pending future development, portions of the site that remain undeveloped may accommodate interim uses, which could include construction staging, paved surface parking, special events, concerts, farmers markets, pop-up retail markets, shipping-container-based retail and food vendor markets, and similar temporary activities. Construction associated with future development would result in similar effects as demolition activities, described above, and would be temporary. Temporary fencing would also be installed to prevent unauthorized access, promote site safety, and shield views from the public.

While future development of the parcels would result in a permanent change in the current view, future development would comply with height restrictions of the Capitol View Protection Act, which limits building heights to 150 feet for the eastern portions of the State Personnel Board Building site and the EDD Headquarters Building site on the 800 block of Capitol Mall, 300 feet for the western portions of the State Personnel Board Building site and EDD Headquarters Building site on the 800 block of Capitol Mall, and 400 feet for the western portion of the EDD Headquarters Building site on the 700 block of Capitol Mall and the EDD "Solar Building" Annex. These height limits equate to buildings of a maximum of roughly 12 stories (150 feet), 24 stories (300 feet), and 33 stories (400 feet). The specified height limit does not apply to decorative building caps or rooftop mechanical equipment that is screened and placed in the farthest possible location when viewed from the State Capitol or Capitol Park. The site design and building construction materials would be consistent with those used for similar high-quality civic buildings in prominent urban environments. While specific plans have not been developed for future development, the land use types being considered for the project would be consistent with the existing surrounding uses and visual setting of the downtown Sacramento area and the Capitol Mall corridor.

Future development could alter existing views within and across the project site through the introduction of new buildings and urban development; however, these changes would occur within a highly urbanized downtown setting characterized by mid-rise and high-rise development and would be consistent with the scale and character of surrounding development. In addition, future development would be required to comply with the Capitol View

Protection Act, which preserves important public views to and from the State Capitol. Therefore, future development would not substantially degrade a scenic vista, and no permanent adverse effects on the Capitol Mall scenic corridor are anticipated to result from future development at the site.

Conclusion

Implementation of the proposed project would result in temporary changes to the east-facing views of Capitol Mall toward the State Capitol during demolition of the existing three state-owned office buildings and construction activities associated with future development. Demolition activities and future development would occur in stages over time and would require temporary fencing and construction-related visual obstructions. These activities would be temporary and typical of development activities within downtown Sacramento, would not obstruct views of the State Capitol, and would not permanently create an adverse effect on a scenic vista. While future development would result in a permanent alteration of the existing northern and southern edges of the Capitol Mall corridor, development of the potential land use types would be consistent with the setting of downtown Sacramento and the Capitol Mall corridor through the development of uses typically found in the surrounding area. Additionally, future development would be required to comply with the Capitol View Protection Act, which sets height restrictions in zones surrounding the Capitol building. Thus, there would not be a substantial adverse effect on a scenic vista and this impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.17-2: Substantially Degrade Existing Visual Character or Quality

The proposed project would result in demolition of three state-owned office buildings and future development of the site. The project is located within an urban setting in downtown Sacramento. Future development includes a mix of uses typically found within an urban environment. Because the proposed project is located on a site with existing office buildings surrounded by a mix of low-rise, mid-rise, and high-rise buildings, the local visual character, as experienced by viewer groups in the area, would not be substantially degraded once future development is completed. Although the project would result in temporary visual changes associated with demolition and construction, the full buildout of the proposed project would not substantially degrade the visual character or quality of the of the site and its surroundings. Therefore, this impact would be **less than significant**.

The proposed project involves demolition of three existing state-owned office buildings. Upon completion of building demolition, the site is intended to be ready for construction of future uses. The project area viewshed includes a wide mix of architectural styles from different eras. The viewshed near the project site is a developed urban environment, with low-rise, mid-rise, and high-rise buildings in the immediate project surroundings. The surrounding buildings are primarily office buildings.

Demolition

During demolition activities, the visual character or quality of the project site would be temporarily degraded. While it is not known at this time the order in which the buildings would be demolished, demolition of the buildings would be sequenced, and would commence after abatement of hazardous materials is completed. It is anticipated that the abatement and demolition of all three buildings would occur over an 18-month period. Temporary fencing would be installed to prevent unauthorized access and promote site safety surrounding the demolition area, as well as to shield views from the public. Once abatement and demolition activities are completed, fencing would be retained until future development occurs to maintain the safety and security of the sites. As part of the demolition process, removal of the existing asphalt, concrete, trees, and sidewalks surrounding the building could occur. However, as discussed below, future development would install new landscaping. Similar abatement and demolition activities occur and are common in the downtown Sacramento area. Temporary views of construction projects are common in an urban setting and do not constitute an adverse change in the permanent visual environment. As a result, temporary views associated with abatement and demolition would not be unusual for the surrounding area.

Future development is expected to occur within a year or less of the completion of project demolition. Therefore, although the absence of the three existing buildings and the presence of security fencing would alter the views along Capitol Mall, this alteration would be temporary. Additionally, after demolition activities have been completed and future development is pending, portions of the site that remain undeveloped may accommodate interim uses, which could include construction staging, paved surface parking, special events, concerts, farmers markets, pop-up retail markets, shipping-container-based retail and food vendor markets, and similar temporary activities. These uses would be temporary and would be consistent with uses in the surrounding area of downtown Sacramento.

Viewers in the project vicinity include pedestrians; tourists; employees that occupy office buildings adjacent to the project site; commuters along Capitol Mall, 7th Street, 8th Street, 9th Street, and N Street; and nearby residents. Because these viewers are most familiar with the visual character of the project site and vicinity through regular exposure, these viewers could be most sensitive to visual changes of the project site. However, as noted above, abatement and demolition activities would be temporary in nature and would not result in permanent changes to the visual character of the project area.

Because demolition activities would be temporary, occur in sequenced phases, and would be consistent with activities often found in the surrounding area, and the period of active demolition activities and the absence of buildings on the project parcels would be temporary, demolition of the three state-owned office buildings would not result in a permanent substantial degradation of the existing visual character or quality of the area.

Future Development

As stated above, future development of the project site includes a mix of land uses that would comprise approximately 3,630,000 GSF at full buildout. While site design and building construction materials of future development are currently unknown, future development would use designs and materials consistent with those used for similar high-quality contemporary buildings in the vicinity to create consistency within the area. Materials would be stable, durable, and timeless in quality, would not be prone to weathering or deterioration, and would require minimal maintenance and little or no replacement or refurbishment during the target multi-decade lifespan of the project. Future development would retain the general character of buildings in downtown Sacramento near the State Capitol. Although the new development would change the visual character of the project site compared to existing uses (i.e., state offices), the project would complement the existing mix of urban low-rise, mid-rise, and high-rise buildings in the immediate project surroundings.

Once constructed, there is potential for future buildings to be taller in height than the three existing state-owned buildings and they may be visible from distant viewpoints where the existing project buildings are not visible. However, modification of the skyline as seen from distant viewpoints, particularly the addition of buildings that would not be the tallest buildings in the area, would be unremarkable.

Future development could introduce buildings that are taller than the existing state-owned office buildings and may result in additional shadows on adjacent streets, sidewalks, and nearby development. However, shadowing is a common characteristic of dense urban environments containing mid-rise and high-rise buildings. Any increases in shadowing would occur within an already urbanized setting and would not substantially alter or degrade the visual character or quality of the project site or surrounding area.

As mentioned above, the asphalt, trees, landscaping, and sidewalks surrounding the project side may be removed during demolition of the existing state-owned buildings, as well as during construction activities of future development. If asphalt, tree, landscaping, and sidewalk removal occurs, these features would be reestablished and replaced as part of full buildout. If City street trees are removed, new trees would be planted consistent with the City of Sacramento Tree Preservation Ordinance (see Mitigation Measure 4.15-4 in Section 4.15, "Biological Resources").

The development of future land uses would not result in a substantial change in the visual character of the project site or the surrounding area. Although future development could be taller in height than the currently existing state-owned office buildings and may introduce new design materials, development would comply with the height restrictions of the Capitol View Protection Act and applicable design guidelines, including those of Sacramento State.

Future development would be designed to be compatible with the adjacent mid-rise and high-ride buildings. Thus, the local visual character and quality would not be substantially degraded.

Conclusion

Demolition and future construction activities would result in temporary visual changes typical of urban redevelopment. However, these activities are not unusual for the surrounding area. Future development would be compatible with the surrounding mix of low-rise, mid-rise, and high-rise buildings and would incorporate appropriate design features, landscaping, and building materials. Although future development may alter the appearance of the site; could include taller buildings; and may result in additional shadowing on adjacent streets, sidewalks, and nearby development; these changes would occur within an existing urban environment characterized by dense development and would not substantially degrade visual character or quality. Compliance with applicable height restrictions and design guidelines would further ensure compatibility with the surrounding area. Therefore, the project would not result in a substantial adverse effect on visual character or quality, and impacts would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.17-3: Conflict with Applicable Zoning and Other Regulations Governing Scenic Quality

Implementation of the proposed project would not conflict with regulations or policies governing scenic quality, including the Capitol View Protection Act and the Central City Urban Design Guidelines. Demolition activities would be temporary and would not obstruct protected Capitol views or degrade established view corridors, while future development would be designed to be compatible with the surrounding urban environment and consistent with applicable view protection and urban design objectives. Through compliance with Capitol view protection requirements and incorporation of features similar to those of the surrounding area, the project would preserve scenic quality. Therefore, impacts related to conflicts with regulations and policies governing scenic quality would be **less than significant**.

The project site is located within downtown Sacramento and is subject to certain regulations and policies intended to protect scenic quality and visual character, including the Capitol View Protection Act. Relevant regulations and policies are intended to preserve views of the State Capitol, maintain the character of the downtown streetscape, promote high-quality urban design, and ensure compatibility between new development and the surrounding built environment. Although State agencies are not required to comply with local plans and policies, DGS and Sacramento State intend to implement the project in a manner that is consistent with applicable regulations and design guidelines governing scenic quality.

Demolition

Abatement and demolition of the existing three state-owned office buildings would not conflict with applicable regulations, plans, or policies governing scenic quality. Abatement and demolition activities would temporarily alter views within the project area; however, these activities would not obstruct protected views of the State Capitol, degrade established view corridors, or interfere with the objectives of the Capitol View Protection Act. Temporary fencing, staging areas, and demolition equipment would be consistent with activities commonly associated with redevelopment projects in downtown Sacramento and would not result in a permanent change to visual conditions, as demolition would allow for future development to occur on the site. Following demolition, the site could accommodate interim uses that would be consistent with the surrounding urban environment. Therefore, abatement and demolition activities would not conflict with regulations or policies governing scenic quality.

Future Development

Future development of the project site would include a mix of urban land uses and would be designed to be compatible with the surrounding downtown Sacramento environment. Although future development may differ from the existing office buildings in height, massing, and architectural design, development would comply with the height restrictions and view protection objectives of the Capitol View Protection Act. Future development would consider and to the maximum extent feasible be consistent with the general principles and objectives provided in the Central

City Urban Design Guidelines. These principles and objectives promote preservation of important views, pedestrian-oriented streetscapes, high-quality architecture, compatible building scale and massing, and enhancement of the public realm.

Future development would incorporate building materials, landscaping, and urban design features that complement the existing mix of low-rise, mid-rise, and high-rise development in the vicinity. Any portions of City streets that are affected or sidewalks removed during demolition or construction would be replaced as part of site redevelopment, and the redeveloped site would either retain or replace street trees and would include on-site landscaping. In addition, future development would remain compatible with protected Capitol views and surrounding visual character. As a result, future development would not substantially conflict with applicable regulations, plans, or policies governing scenic quality.

Conclusion

The proposed project would not conflict with the Capitol View Protection Act or the Central City Urban Design Guidelines, nor other applicable regulations and policies governing scenic quality. Demolition activities would be temporary and would not affect protected views or established visual resources, while future development would be designed to maintain compatibility with the surrounding urban environment and preserve visual corridors. Therefore, the project would not conflict with applicable regulations, plans, or policies governing scenic quality. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.17-4: Introduction of New Sources of Light and Glare that Adversely Affect Day or Nighttime Views

The Capitol Mall Office Buildings Demolition Project would involve new lighting associated with demolition of the existing state-owned buildings and construction and operational activities of future buildings. Demolition and construction lighting would be temporary and would be utilized primarily as a security measure for the construction site. The proposed exterior finish of future development would not include materials that are highly reflective or that would produce substantial glare. Operational project-related light sources would be similar to existing lighting conditions of the existing state-owned office buildings as well as current lighting present in downtown Sacramento, in terms of amount and intensity of light. Future development would be required to meet CALGreen standards that limit light and glare. For these reasons, project implementation would not create a new source of substantial light that would adversely affect day or nighttime views in the area. This impact would be **less than significant**.

Downtown Sacramento has a large amount of widespread, ambient light from urban uses. Existing sources of light associated with the project site include exterior building lighting, street and parking lot lighting, and spillover of internal lights to the exterior.

Demolition

Abatement and demolition associated with the Capitol Mall Office Buildings Demolition Project would not include additional light sources beyond the types of lighting that are found in the current urban environment. Nighttime security lighting installed at the project site would focus light downward and be the minimum necessary for security purposes. Because the amount and intensity of light emitted during abatement and demolition activities would be limited to an approximately 18-month period and would be similar to the current surrounding urban setting, the nighttime views from sensitive (i.e., residential) land uses would not be significantly affected. Furthermore, the project would not contribute substantially to sky glow effects generated by the community at large. Daytime glare could be produced by construction vehicles associated with abatement and demolition activities, which could reflect or concentrate light. However, as mentioned above, abatement and demolition activities would be temporary, occurring over an approximately 18-month period. Additionally, the number of construction-related vehicles would not substantially increase daytime glare conditions beyond those associated with the existing surrounding urban environment.

Future Development

Downtown Sacramento has a large amount of widespread, ambient light from urban uses including offices, retail, restaurants, and entertainment venues. Future development of the project site would not include additional light sources beyond the types of lighting that are found in the current urban environment. The only additional lighting would be related to the interior-to-exterior lighting associated with additional building stories. As required by applicable building codes, light fixtures would be used for all interior and exterior lighting would be selected based on architectural aesthetic, efficiency, maintenance, and glare control. Because the amount and intensity of light emitted from the potential future land uses would be similar to the current surrounding urban setting, the nighttime views from sensitive (i.e., residential) land uses would not be significantly affected. Furthermore, the project would not contribute substantially to sky glow effects generated by the community at large given the extensive nighttime lighting already present.

Daytime glare could be produced by the increased amount of surface area of a taller building, which could reflect or concentrate light. However, appropriate building materials would be used such as natural stone, precast concrete panels, clear or lightly tinted glass, stainless steel, anodized aluminum, factory-coated metal, and composite panels that minimize glare. Potential future development uses would avoid utilizing materials such as dark tinted or highly reflective glass; materials that can generate substantial glare; painted wood, stucco, and other lightweight commercial materials; or field painted ferrous steel or sheet metal, other than the potential use in small quantities to provide architectural interest. Although energy performance criteria encourage the use of reflective glass in architectural design to reduce penetration of solar radiation into the building interior, it would be avoided to prevent exterior reflections. Future development would also be required to meet the lighting and glare standards contained in the CALGreen Code that limit light and glare.

Because the project would comply with the above standards for reducing light pollution and would avoid the use of highly reflective architectural materials for building design, project implementation would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

Conclusion

The project site is located within downtown Sacramento, an urban environment characterized by substantial existing ambient lighting. Demolition activities would be temporary and would not introduce substantial new sources of light or glare beyond those already present in the surrounding area. Future development of the project site would not include additional light sources beyond the types of lighting that are found in the current urban environment. Future development would be required to incorporate lighting and building design features consistent with CALGreen standards to minimize light trespass, skyglow, and glare, including the use of glare-controlled lighting fixtures and non-reflective building materials. As a result, the project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area, and impacts related to light and glare would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

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5 CUMULATIVE IMPACTS

5.1 INTRODUCTION TO THE CUMULATIVE ANALYSIS

This draft environmental impact report (Draft EIR) provides an analysis of cumulative impacts of the proposed Capitol Mall Office Buildings Demolition Project taken together with other past, present, and probable future projects producing related impacts, as required by Section 15130 of the California Environmental Quality Act Guidelines (State CEQA Guidelines). The goal of such an exercise is twofold: first, to determine whether the overall long-term impacts of all such projects would be cumulatively significant; and second, to determine whether the incremental contribution to any such cumulatively significant impacts by the project would be "cumulatively considerable" (and thus significant). (See State CEQA Guidelines Sections 15130[a]–[b], Section 15355[b], Section 15064[h], and Section 15065[c]; and Communities for a Better Environment v. California Resources Agency [2002] 103 Cal. App. 4th 98, 120.) In other words, the required analysis intends first to create a broad context in which to assess cumulative impacts, viewed on a geographic scale beyond the project site itself, and then to determine whether the project's incremental contribution to any significant cumulative impacts from all projects is itself significant (i.e., "cumulatively considerable").

Cumulative impacts are defined in State CEQA Guidelines Section 15355 as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." A cumulative impact occurs from "the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time" (State CEQA Guidelines Section 15355[b]).

Consistent with State CEQA Guidelines Section 15130, the discussion of cumulative impacts in this Draft EIR focuses on significant and potentially significant cumulative impacts. Section 15130(b) of the State CEQA Guidelines provides, in part, the following:

> [t]he discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact.

A proposed project is considered to have a significant cumulative effect if:

- the cumulative effects of development without the project are not significant and the project's additional impact is substantial enough, when added to the cumulative effects, to result in a significant impact; or
- the cumulative effects of development without the project are already significant and the project contributes measurably to the effect.

The term "measurably" is subject to interpretation. The standards used herein to determine measurability are that the impact must be noticeable to a reasonable person, or must exceed an established threshold of significance (defined throughout the resource sections in Chapter 3 of this Draft EIR).

5.2 CUMULATIVE SETTING

5.2.1 Geographic Scope

The geographic area that could be affected by the project and is appropriate for a cumulative impact analysis varies depending on the environmental resource topic, as presented in Table 5-1.

Table 5-1 Geographic Scope of Cumulative Impacts

Resource Topic	Geographic Area
Land Use and Planning	State's Capitol Area, as defined in the Capitol Area Plan; Central City of the City of Sacramento, as defined by the 2040 General Plan and Central City Community Plan
Population, Employment, and Housing	City of Sacramento
Transportation and Circulation	City of Sacramento and Sacramento region
Utilities and Service Systems	City of Sacramento
Air Quality	Sacramento Valley Air Basin (regional) and immediate project vicinity for highly localized pollutant emissions
Greenhouse Gas Emissions and Climate Change	Global, statewide
Energy	Sacramento Municipal Utility District (SMUD) and Pacific Gas and Electric Company (PG&E) service areas
Noise and Vibration	Immediate project vicinity where project-generated noise could be heard concurrently with noise from other sources
Geology and Soils	City of Sacramento, Central City
Hydrology and Water Quality	Sacramento River watershed
Hazards and Hazardous Materials	City of Sacramento, Central City
Cultural Resources	City of Sacramento (historic period resources) Portions of Central Valley identified as the territory of the local Native American community (prehistoric archaeological resources)
Tribal Cultural Resources	Portions of Central Valley identified as the territory of the local Native American community
Biological Resources	Can be defined differently for each species, based on species distribution, habitat requirements, and scope of impact from proposed activities
Public Services and Recreation	City of Sacramento
Aesthetics, Light, and Glare	City of Sacramento, Central City, within the viewshed of the project

Source: Compiled by Ascent in 2026.

5.2.2 Cumulative Context

The City of Sacramento was founded in 1849 along the Sacramento River waterfront and extended east along J Street toward Sutter's Fort. The city's current charter was adopted by voters in 1920, establishing a city council-and-manager form of government, still used today. The city expanded continuously over the years in the first half of the 1900s and in 1964 merged with the city of North Sacramento, just north of the American River. Large annexations were made of the Pocket area on the south and Natomas area on the north. The City limits encompass approximately 101 square miles of incorporated land (City of Sacramento 2024).

Population in the City of Sacramento has increased substantially since 2000, from about 407,000 in 2000 (US Census Bureau 2001) to an estimated 532,956 in 2026 (California Department of Finance 2026). Population growth in the city is projected to continue through 2040, and most growth is expected to occur in the Central City (City of Sacramento 2021: H 1-2). City of Sacramento population projections indicate that the city may have about 648,000 residents by 2040, an increase of approximately 140,000 residents, representing an approximate increase of residents at a rate of about 1.1 percent per year (City of Sacramento 2021).

On a broad geographic basis, the Sacramento metropolitan area as a whole is facing numerous regional issues pertaining to degradation of air quality, traffic generation, loss of biological habitat, loss of farmland, and other environmental changes related to urban expansion. In response to these concerns, the City's 2040 General Plan favors developing inward, in and near existing developed areas, rather than outward into greenfields on the edge of the city. The General Plan growth pattern focuses on infilling and reusing underutilized properties, intensifying

development near transit and mixed-use activity centers, and locating jobs closer to housing. The General Plan includes policies to reduce carbon emissions, including encouraging mixed-use development that supports walking, biking, and use of public transit; "green building" practices; and use of solar energy systems, architectural design to reduce heat gain, recycled construction materials, and water conservation measures (City of Sacramento 2024).

The project site is located within the Central Business District (CBD) of the Central City Community Plan area, which is the core of the City of Sacramento (City of Sacramento 2018). The CBD is an urban downtown area that includes the State Capitol, State government buildings, corporate offices and businesses, high-rise condominiums, historic neighborhoods, parks and recreational areas, restaurants and shops, schools, and industrial and manufacturing complexes all within a tree-lined street grid. The City's Housing Element estimated that the Central City Community Plan area had 35,547 residents in 2018, a 9.8 percent change between 2010 and 2018 (City of Sacramento 2021: H 1-2).

The State's Capitol Area Plan (CAP), the statutory master plan for development on State-owned land surrounding the State Capitol (within the City's Central City Community Plan area), also encourages consolidating offices within, and using the existing resources of the Capitol Area (DGS 1997). The CAP boundary is shown in Figure 4.2-1 in Section 4.2, "Land Use and Planning." The CAP speaks to increased energy conservation and use of the transit system in the Capitol Area and suggests examination of underutilized State properties. As described in Section 4.2, "Land Use and Planning," the project site is designated as "Parks and Open Space" and "Other Existing Use" in the State's CAP (DGS 1997).

5.2.3 Planning Environment

The Capitol Mall Office Buildings Demolition Project involves the removal of three existing state-owned office buildings in downtown Sacramento along Capitol Mall and N Street: the Employment Development Department (EDD) Headquarters at 800 Capitol Mall, the EDD "Solar Building" Annex at 751 N Street, and the State Personnel Board Building at 801 Capitol Mall within the Capitol Area (addressed by the State's CAP). For this reason, the area most relevant to cumulative impacts is the Central City area of Sacramento. The following plans establish and assess the land use pattern and goals for development and growth in the Central City:

- 1997 Capitol Area Plan (DGS 1997);
- Capitol Area Plan EIR, certified in 1997;
- Capitol Area Plan Progress Report (CADA 2025);
- Sacramento Central City Community Plan, adopted in 2018;
- City of Sacramento 2040 General Plan Update Master EIR, certified in 2024 (SCH No. 2019012048);
- City of Sacramento Streets for People Plan (City of Sacramento 2025); and
- Sacramento Area Council of Governments (SACOG) Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) EIR, certified in 2025 (SCH No. 2025020168) (SACOG 2025).

5.2.4 Related Projects

The following analysis of cumulative impacts relies primarily on the plans for land use and growth in downtown Sacramento, as listed above in Section 5.2.3. This is consistent with Section 15130(d) of the State CEQA Guidelines, which states, "Previously approved land use documents, including, but not limited to, general plans, specific plans, regional transportation plans, plans for the reduction of greenhouse gas emissions, and local coastal plans may be used in cumulative impact analysis."

This analysis also considers related projects, or those large past, present, and probable future projects located in and around downtown Sacramento that could relate to the project. This approach is consistent with Section 15130(b)(1)(A) of the State CEQA Guidelines, which states that a discussion of significant cumulative impacts may include "[a] list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency…." Past projects are those already constructed and operational that are

considered as part of the existing baseline conditions, such as the California Natural Resources Agency Headquarters (715 P Street), Downtown Commons (405 K Street), Golden 1 Center (at 5th Street between J and L Streets), some elements of The Railyards development (e.g., Tani Cantil-Sakauye Sacramento County Courthouse, AJ and Wong Center residential projects), and others. The probable future projects considered herein are those in the project vicinity that are reasonably foreseeable, meaning known projects that are planned, proposed, or approved. The analysis of cumulative environmental impacts associated with the project addresses the potential incremental impacts of the proposed project in combination with the related projects. This is not an all-inclusive list of projects in the area. Rather, it identifies projects approved or planned in downtown Sacramento and the surrounding area that, based on the nature of environmental resources being examined, location, and project type, have the potential to interact on a cumulative basis with the proposed project. Each of the following projects is of substantial size, located in the general vicinity of the project, and could generate or exacerbate environmental effects being examined for the Capitol Mall Office Buildings Demolition Project.

Section 15130(b) of the State CEQA Guidelines provides that a cumulative impact analysis consider either a list of projects (the list approach) or relevant plans and planning documents (the plan approach). The following cumulative impact analysis exceeds the requirements of Section 15130(b) by implementing a plan approach and supplementing the analysis with a modified project list approach. This combined approach ensures that the projects likely to have the greatest cumulative interaction with the proposed project are considered.

STATE OF CALIFORNIA

Capital Annex Project

The California State Capitol Building and its Annex house essential government functions, officials, and staff, and welcomes countless visitors each year. The Annex was a six-story, approximately 325,000 square foot building, with vehicle parking in a basement level. The Capitol Annex Project involves demolition of the existing 325,000-square-foot Annex and construction of a new Annex that would provide approximately 525,000 gross square feet of space, and abandonment of the existing parking garage and construction of a new underground parking garage east of the new Annex (up to 200 parking spaces). The project site is located on the Capitol grounds, bounded by 10th Street on the west, N Street on the south, L Street on the north, and 12th Street on the east (roughly following the alignment of the eastern edge of 12th Street across Capitol Park). Once the Annex project is complete, government officials and staff temporarily housed at the 10th and O Street Office Building would be moved back into the Annex, and the 10th and O Street Office Building would be occupied by other State departments and employees. Construction of the entire project is in progress and is anticipated to be complete by the end of 2027.

Subterranean Building Demolition Project

The project, located between N and O Streets and 7th and 8th Streets, includes the demolition of the eastern side of the Subterranean Building, along 8th Street. Existing uses on the western side of the building would remain, and would remain in operation during demolition. The site is anticipated to be developed with future uses that may include affordable housing or other State uses.

CITY OF SACRAMENTO

The Railyards Project

The Railyards property is located just north of downtown and south of the River District. Once serving as the western terminus of the 1860s Transcontinental Railroad, today the Railyards continue to house a major transportation hub. The 244-acre Railyards site will be a mixed-use hub for entertainment, retail, housing, office, theaters, parks, hotels, and museums. The original Sacramento Railyards project was approved in 2007, and some elements have been constructed. The project proposed development of up to 12,100 dwelling units, 1.4 million square feet of retail uses, 1,100 hotel rooms, 2.4 million square feet of office uses, 485,390 square feet of historic/cultural space, and 491,000 square feet of mixed use. A subdivision modification for minor changes was approved by the Planning and Design

Commission in 2012. The changes included revising sections of 5th Street and 7th Streets to slow two-way traffic; changing the alignment of 5th and 6th Streets; and revising the tentative map to reflect the realignment and to accommodate a parking garage. In 2016, the City Council approved planning entitlement for:

- 6,000–10,000 dwelling units,
- 514,270 square feet of retail,
- 2,757,027–3,857,027 square feet of office use,
- 771,405 square feet of flexible mixed use,
- 1,228,000 square feet of medical campus,
- 1,100 hotel rooms,
- 485,390 square feet of historic and cultural uses,
- 33 acres of open space, and
- a soccer stadium with about 20,000 seats and potential to expand to approximately 25,000 seats

Construction to date includes the stadium (in progress), with completion estimated in 2028; the eight-story, 310-bed Kaiser Permanente Medical Center, expected to be completed in 2029; the 18-story Tani G. Cantil-Sakauye Sacramento Superior Courthouse, which opened in April 2026; and several residential projects.

I Street Bridge Replacement over the Sacramento River

The Cities of Sacramento and West Sacramento propose replacement of the 100-year-old I Street Bridge to accommodate wider travel lanes, bicycle lanes, and sidewalks that meet accessibility standards. The new bridge will be constructed upstream of the existing structure, crossing the Sacramento River between the Sacramento Railyards and the West Sacramento Washington planned developments. The existing I Street Bridge would continue to be used by the railroad. The approach viaducts to the existing I Street Bridge would be demolished, which would result in better access to the waterfront in both cities.

City of Sacramento Central City Specific Plan

The City of Sacramento's Central City Specific Plan integrates planned transportation improvements and programs to further enhance the downtown grid. The future infrastructure improvements include:

- 10th Street, 15th Street, and L Street lane reductions from three lanes to two lanes;
- N Street conversion from an eastbound one-way facility to two-way travel;
- Pedestrian network improvements within the vicinity of the project site;
- Class II enhanced buffered bike lanes along 10th Street and 15th Street, along the Class II bike lane on N Street, and the existing Class II Bike Lane bisecting Capitol Park; and
- Bus stop enhancements on 15th Street.

Downtown Riverfront Streetcar Project

The Downtown Riverfront Streetcar Project, overseen by Sacramento Regional Transit (SacRT) involves the construction of a 1.8-mile streetcar line between the West Sacramento Bridge District and Sacramento Valley Station, connecting West Sacramento to Sacramento and the SacRT light rail system. The streetcar line is planned to operate on new rail starting along Cabaldon Parkway at Sutter Health Park, across the Tower Bridge, and along Capitol Mall until 3rd Street where it would transition to N Street and join existing rail lines along 7th Street, 8th Street, and H Street. New stations are planned at Sutter Health Park, 2nd Street and Capitol Mall, and N Street and 5th Street. The streetcar would connect to the existing light rail stations at 7th and Capitol, 8th and Capitol, 8th and K, 7th and I, 8th and I, and the Sacramento Valley Station. Construction is anticipated to begin in early 2027 and be completed in 2030.

1511 I St Apartments

The 1511 I Street Apartments project is a 90-unit affordable housing development proposed on a 0.86-acre site in downtown Sacramento. The project proposes one- units and two-bedroom units, property management offices, conference rooms, multipurpose room, and other amenities. The project would provide four staff parking spaces and 55 bike parking spaces.

South Avenue Place Subdivision

The South Place Subdivision project proposes to subdivide a 4.73-acre property into 35 parcels at 80 South Avenue. The project would develop single-unit or duplex-units with an internal cul-de-sac. The applicants have requested design review of the tentative subdivision map layout and no new construction is currently proposed.

River City Apartments

The River City Apartments project is a five-story multifamily housing development at 1601 69th Street. The project will include 66 units, 65 of which are affordable. There will be one-, two-, and three-bedroom units. The project building record has been issued and the project is currently under construction.

Natomas 38

The Natomas 38 project at 4451 El Centro Rd is a proposed 44.9-gross-acre mixed-use project. The project would subdivide the project site into 7 commercial lots, 215 residential lots, and 29 common lots. The development would involve a new single-family residential neighborhood and a neighborhood-serving commercial center with 186,000 square feet of retail space across multiple buildings.

Airport Road Apartments

The Airport Road Apartments project proposes to demolish two existing structures at 3590 Airport Road to construct multi-unit dwellings within the 1.86-acre project site. The project would develop two 35-unit residential buildings, including studio, one- and two- bedroom units, 73 surface parking spaces, and over 4,500 square feet of open space.

5.3 ANALYSIS OF CUMULATIVE IMPACTS

The following sections contain a discussion of the cumulative effects anticipated from implementation of the Capitol Mall Office Buildings Demolition Project, together with related plans, projects and development, for each of the environmental issue areas evaluated in this Draft EIR. The analysis conforms with Section 15130(b) of the State CEQA Guidelines, which specifies that the "discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact."

When considered in relation to relevant plans and other reasonable foreseeable projects, cumulative impacts to some resources would be significant and more severe than those caused by the proposed project alone.

For purposes of this EIR, the project would result in a significant cumulative effect if:

- the cumulative effects of related projects (past, current, and probable future projects and relevant plans) are not significant and the incremental impact of implementing the Capitol Mall Office Buildings Demolition Project is substantial enough, when added to the cumulative effects of related projects, to result in a new cumulatively significant impact; or
- the cumulative effects of related projects (past, current, and probable future projects and relevant plans) are already significant and implementation of the Capitol Mall Office Buildings Demolition Project makes a considerable contribution to the effect. The standards used herein to determine a considerable contribution are that either the impact must be substantial or must exceed an established threshold of significance.

This cumulative analysis assumes that all mitigation measures identified in Chapter 4 to mitigate project impacts are adopted and implemented, and all elements of the design build performance criteria that would minimize environmental effects are implemented. The analysis herein analyzes whether, after implementation of project-specific mitigation and performance criteria that minimize environmental effects, the residual impacts of the project would cause a cumulatively significant impact or would contribute considerably to existing/anticipated (without the project) cumulatively significant effects. Where the project would so contribute, additional mitigation is recommended where feasible.

5.3.1 Land Use and Planning

The State's CAP, the City of Sacramento 2040 General Plan, and the Central City Community Plan establish land uses for State-owned land and for the city, respectively. Consistency with applicable land use plans or policies adopted for the purpose of reducing or avoiding environmental impacts are site specific and addressed on a project-by-project basis. The related projects described above are proposed on infill sites within the Central City Community Plan area; the State projects are also within the CAP boundaries. The related projects are, to the extent that proposed land uses have been identified, apparently consistent with land use plans and policies. The related projects would not disrupt or divide established communities in the project vicinity, but rather would develop sites within the Central City Community Plan area consistent with the State's CAP and the City's 2040 General Plan. In particular, the State's proposed P Street Office Building Project would be consistent with the CAP by developing an underutilized space, now a surface parking lot, within downtown. Therefore, there is not an adverse cumulative land use condition.

No part of the Capitol Mall Office Buildings Demolition Project would extend beyond the existing urban boundaries of the CAP or the Central Business District, within the Central City Community Plan Area, in downtown Sacramento and no element of the project would create a barrier within the established downtown community. The project would be compatible with surrounding land uses and would neither result in, nor contribute to a cumulative impact regarding potential division of an established community. In addition, the project would be consistent with the CAP, the CAP Implementation Program, the 2021 California Five-Year Infrastructure Plan, and local plans and policies. Because no land use impacts would occur on a project-specific basis, the project would not measurably contribute to any potential cumulative land use impacts.

5.3.2 Population, Employment, and Housing

For population, employment, and housing, the cumulative setting includes the City of Sacramento (see Table 5-1). The Capitol Mall Office Buildings Demolition Project and related projects would generate temporary construction employment and long-term increases in population, employment, and housing. The project is estimated to generate up to 325 construction jobs during peak construction periods, approximately 3,200 permanent jobs, and 1,250 housing units capable of accommodating approximately 2,750 residents (see Table 4.3-5 in Section 4.3, "Population, Employment, and Housing"). A similar scale of increases in population, employment, and housing would occur under other cumulative development projects (see Section 5.2.4, "Related Projects") and implementation of the SACOG 2025 Blueprint and Sacramento 2040 General Plan. Environmental effects associated with project-generated population and employment growth, including transportation, air quality, noise, public services, and utilities impacts, are addressed in the applicable technical sections of this Draft EIR and are not discussed further in this section.

As identified in Table 4.3-3, 45,900 Sacramento County residents were employed in the construction industry in 2024, representing an increase of approximately 48 percent since 2015 (EDD 2026). Like all construction jobs, those associated with the proposed project and cumulative development would be temporary. It is the nature of construction work that construction contractors bid and work on projects based on availability and workforce demand. As existing construction projects near completion, contractors may seek new projects to maintain employment for existing workers. Although some construction workers could relocate to the city or region in response to employment opportunities, the existing labor force would be sufficient to meet anticipated construction employment needs for the project and cumulative development. Furthermore, the Sacramento 2040 General Plan anticipates continued growth in jobs and includes policies, such as Policy LU 1.8, that promote the designation of

sufficient land and development potential for housing and employment opportunities for a range of incomes and household types throughout the city, and encourages a balance between job type, workforce, and housing development. Accordingly, temporary construction employment associated with cumulative development would not induce substantial population growth or create a need for substantial additional housing, and the project would not make a substantial contribution to this cumulative effect.

The SACOG 2025 Blueprint and the Sacramento 2040 General Plan anticipate growth in jobs and housing throughout the region and within the city through 2050 and 2040, respectively, and are anticipated to move the region and the city closer to SACOG's goal of 1.2 jobs per household (see Table 4.3-4). Although employment growth is expected to exceed housing growth in the city, county, and region, the difference between the number of jobs and supporting households is projected to narrow over the planning horizon. Additionally, the Sacramento 2040 General Plan is designed to accommodate projected employment growth while balancing future housing, office, retail, commercial, and industrial development (City of Sacramento 2025).

The jobs/housing index for the City of Sacramento was 1.63 in 2020 and is projected to decrease to 1.35 in 2050. Similarly, the Downtown Sacramento area had a jobs/housing index of 10.23 in 2020 and is projected to decrease to 4.96 in 2050. Although the City of Sacramento is projected to continue to have more jobs than housing units, these declining ratios indicate that the ratio of jobs to housing units in the region is relatively balanced and is projected to move even closer to equilibrium in the future. The proposed project would contribute approximately 3,200 permanent jobs and 1,250 housing units capable of accommodating approximately 2,750 residents. Although the project would contribute to cumulative growth in population and employment, that growth would be consistent with regional and local growth projections and would not measurably contribute to a significant cumulative imbalance between employment and housing opportunities.

The Sacramento 2040 General Plan and 2025 Blueprint specifically anticipate substantial increases in population, employment, and housing throughout the city and region. As shown in Table 4.3-4, in Section 4.3, "Population, Employment, and Housing," approximately 278,000 housing units are projected to be added in the region by 2050, including approximately 10,075 housing units in the Downtown Sacramento area. The project would contribute both employment opportunities and housing, including approximately 1,250 housing units, and therefore would not prevent the City from achieving regional jobs-housing balance objectives. Accordingly, the project would not induce substantial unplanned population growth, displace existing housing or residents, or make a substantial contribution to a significant cumulative jobs-housing imbalance.

5.3.3 Transportation and Circulation

This cumulative transportation and circulation impact analysis considers the implementation of the project alongside existing and future land use development and transportation system changes anticipated in the City of Sacramento 2040 General Plan and the Central City Community Plan. Future land use growth associated with these planning documents is included in the SACOG regional travel demand model. The cumulative analysis additionally considers the implementation of the project relative to the 2018 Central City Specific Plan, which includes more detailed transportation policies and planned transportation system improvements when compared to the General Plan and the Central City Community Plan. Note that the City of Sacramento is currently in the process of updating the Central City Specific Plan, however, the 2018 version is considered the current version for the purposes of this analysis.

The City of Sacramento General Plan and Central City Community Plan land use vision focuses on a compact urban footprint, infill development on vacant and underutilized properties, and concentrating jobs, housing, and entertainment opportunities to support frequent, reliable transit service and foster connected, accessible neighborhoods. The land use element focuses on the Central City as the primary center for commerce, culture, living, and government. The General Plan includes policies to encourage mixed-use development that supports walking, biking, and use of public transit and reduces carbon emissions that contribute to climate change. The downtown area provides sidewalks for pedestrian access, bicycle facilities, and transit services that include SacRT light rail and numerous bus lines. The Central City Specific Plan identifies additional planned improvements to the downtown Sacramento transit, bicycle, and pedestrian facilities to increase the use of non-motorized transportation modes for

downtown residents, employees, and visitors. The Central City Specific Plan additionally includes planned land uses and related policies that are similar to those set forth in the City of Sacramento General Plan and Central City Community Plan.

As described in Section 4.2, "Land Use and Planning," and shown in Figure 2-2, the project site is designated as Central Business District in the Central City Community Plan. Within the City of Sacramento's 2040 General Plan the project site is designated Residential Mixed Use. The General Plan's Residential Mixed Use designation includes a range of residential, retail, employment, entertainment, cultural, and personal service uses, general offices and community institutional uses, assembly facilities, and other compatible public and quasi-public uses. The General Plan also allows the project area to have a floor area ratio (FAR) of up to 15.0. The Central City Community Plan identifies the same land uses as the General Plan and establishes a minimum FAR for mixed-use development of 3.0 and a minimum residential density of 61 dwelling units per acre. The 2018 Central City Specific Plan includes mobility-related policies referenced in the Central City Community Plan, including goals to connect gaps in the bicycling network, enhance pedestrian infrastructure, and promoting transit as the preferred mode of transportation within the Central City.

The project is generally consistent with the intent of the City of Sacramento 2040 General Plan, the associated Central City Community Plan, and the Central City Specific Plan because the project would include demolition and redevelopment of three existing underutilized buildings, a development scenario with a mix of land uses, and an increase to residential and employment density in the Central City. Therefore, during typical daily operations, the project would not alter the cumulative transportation or land use scenarios considered in these plans and cumulative effects would be consistent with those associated with these plans. However, it is unclear the extent to which these planning documents anticipated the inclusion of a large event venue at the project site and the associated effects of event operations and event-related travel activity on the surrounding transportation system. Therefore, temporary event-related effects on the Central City transportation system could differ from those anticipated in the cumulative scenario of these planning documents and is the focus of the cumulative effects analysis provided here.

The following analysis addresses transportation impact topics in the same order as in Section 4.4, "Transportation and Circulation." Effects of project operation are addressed first, and effects from building demolition and future construction are addressed together at the end.

TRANSIT, BICYCLE, AND PEDESTRIAN FACILITIES

The Central City Specific Plan EIR (2018) evaluated cumulative impacts to bicycle, pedestrian, and transit facilities associated with the implementation of the Central City Specific Plan. As described above, typical daily operations of the project would be consistent with the cumulative land use and transportation vision set forth in the Central City Specific Plan, the General Plan, and the Central City Community Plan. However, temporary event-related effects on the Central City transportation system could differ from those anticipated in the cumulative scenario of these planning documents.

Bicycle Facilities

Impact 4.12-14 of the Central City Specific Plan EIR describes how the implementation of the Central City Specific Plan would result in the expansion of bicycle facilities within the plan area and within other areas of the City. The expanded bicycle network would provide additional bicycle connections, fill gaps in the existing bicycle network, increase the separation of bicyclists from vehicular traffic, and enhance bicycle connectivity between neighborhoods. These improvements would further encourage bicycling and reduce vehicle travel demand. The analysis determined that the Central City Specific Plan would not result in a significant cumulative impact to bicycle facilities.

During typical daily operations, the project would not materially alter the land use or transportation system assumptions considered in the analysis presented for Impact 4.12-14 of the Central City Specific Plan EIR. Therefore, typical daily operations of the project would not make a substantial contribution to a cumulative impact to bicycle facilities.

However, as described in Impact 4.4-1 in this EIR, project events could cause temporary physical disruptions to bicycle facilities and activity before, during, and after events. This condition would similarly be present under cumulative

conditions. Project events could occur simultaneously with events on Capitol Mall, Capitol Park, the Golden 1 Center, or other nearby locations, exacerbating temporary disruptions to bicycle facilities and activities. For events at these existing facilities, event transportation management plans (ETMPs) are prepared and executed. As part of the ETMPs, when events occur simultaneously at more than one venue, the plans are coordinated to minimize and avoid adverse cumulative interactions. However, without a similarly effective coordinated ETMP for the proposed project, project events could cause a substantial contribution to a potentially significant cumulative impact to bicycle facilities.

Pedestrian Facilities

Impact 4.12-12 of the Central City Specific Plan EIR describes how the implementation of the Central City Specific Plan would result in the expansion of pedestrian facilities within the plan area and within other areas of the City. The expanded pedestrian network would provide additional pedestrian connections, fill gaps in the existing pedestrian network, and enhance pedestrian connectivity between neighborhoods. These improvements would further encourage walking and reduce vehicle travel demand. The analysis determined that the Central City Specific Plan would not result in a significant adverse cumulative impact related to pedestrian facilities.

During typical daily operations, the proposed project would not materially alter the land use or transportation system assumptions considered in the analysis presented for Impact 4.12-12 of the Central City Specific Plan EIR. Therefore, typical daily operations of the project would not contribute to or cause a significant cumulative impact to pedestrian facilities.

However, as described in Impact 4.4-1 in this EIR, project events could cause temporary physical disruptions to pedestrian facilities and activity before, during, and after events. This condition would similarly be present under cumulative conditions. Project events could occur simultaneously with events on Capitol Mall, Capitol Park, the Golden 1 Center, or other nearby locations, exacerbating temporary disruptions to bicycle facilities and activities. For events at these existing facilities, ETMPs are prepared and executed. As part of the ETMPs, when events occur simultaneously at more than one venue, the plans are coordinated to minimize and avoid adverse cumulative interactions. However, without a similarly effective coordinated ETMP for the proposed project, project events could cause a substantial contribution to a potentially significant cumulative impact to pedestrian facilities.

Transit Services and Facilities

Impact 4.12-13 of the Central City Specific Plan EIR describes how the implementation of the Central City Specific Plan would include a variety of roadway network and transit network projects that would reduce transit vehicle delay from traffic signals and from slow-moving traffic. The Central City Specific Plan would additionally include improvements to transit facilities such as longer stop areas, bus bulb-outs, and enhanced sidewalks at high activity bus stops to further enhance transit access and reduce dwell delay due to boarding and alighting. The Central City Specific Plan would not include any changes to SacRT service and therefore would not adversely affect transit accessibility. The analysis determined that the Central City Specific Plan would not result in a significant cumulative impact to transit service and facilities.

During typical daily operations, the project would not materially alter the land use or transportation system assumptions considered in the analysis presented for Impact 4.12-13 of the Central City Specific Plan EIR. Therefore, typical daily operations of the project would not contribute to or cause a significant cumulative impact to transit service and facilities.

However, as described in Impact 4.4-1 in this EIR, project events could cause temporary physical disruptions to transit service and facilities and activity before, during, and after events. This condition would similarly be present under cumulative conditions. Project events could occur simultaneously with events on Capitol Mall, Capitol Park, the Golden 1 Center, or other nearby locations, exacerbating temporary disruptions to bicycle facilities and activities. For events at these existing facilities, ETMPs are prepared and executed. As part of the ETMPs, when events occur simultaneously at more than one venue, the plans are coordinated to minimize and avoid adverse cumulative interactions. However, without a similarly effective coordinated ETMP for the proposed project, project events could cause a substantial contribution to a potentially significant cumulative impact to transit service and facilities.

Mitigation Measures

Mitigation Measure 4.4-1a (Develop and Implement an ETMP) would similarly be required under cumulative conditions. Development and implementation of an ETMP would identify strategies to minimize temporary event-related disruptions to bicycle, pedestrian, and transit facilities. However, as described in the discussion of Impact 4.4-1, it cannot be confirmed at this time that the ETMP would fully address temporary physical disruptions to the transportation system because of uncertainties regarding the participation of other agencies and entities and the ability to fully achieve desired effects. Therefore, the project would cause a substantial contribution to a significant and unavoidable cumulative impact to bicycle, pedestrian, and transit facilities.

VEHICLE MILES TRAVELED

The Sacramento Central City is, and would remain with development of the proposed project and other projects in the vicinity, the most densely and diversely developed area in the region and a low-vehicle miles traveled (VMT) area within the Sacramento region. Given the existing classification of the Sacramento Central City as a low-VMT area, there is not an existing significant adverse cumulative impact in the Central City related to VMT.

The project would introduce additional complementary land uses to the Sacramento Central City, specifically residential units that could be marketed to students and campus employees and commercial retail and restaurant space. This increase in land use diversity would increase internal trip capture and reduce VMT per employee compared to the existing downtown. While the project introduces new complementary land uses, the overall mix of the uses and character of the campus will be similar in features (i.e., density, mix of uses, and transit accessibility) to the surrounding area.

Per CEQA Guidelines Section 15064.3 (b)(1), "generally projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact." The entire project site is within 0.5 miles of a major transit stop (i.e., multiple SacRT light rail transit stations).

The project site is in an area that currently generates work VMT per employee that is 16 percent below the regional average and household VMT per capita that is 28 percent below the regional average. The Technical Advisory suggests office projects and residential projects exceeding a level of 15 percent below existing regional metrics may indicate a significant impact. Since the project is in an area that generates VMT metrics below this 15 percent threshold, it is considered a low-VMT area for both office and residential use. Per the Technical Advisory, office projects "that locate in areas with low VMT and incorporate similar features (i.e., density, mix of uses, transit accessibility) will tend to exhibit similarly low VMT." This would continue to be the case in the cumulative condition.

Additionally, it is anticipated that the ground floor retail included as part of proposed development scenario will in large part serve the project population and the immediate surrounding neighborhoods. Therefore, it is reasonable to conclude that the commercial retail and restaurant components of the project would primarily be local-serving in nature and thus have a less-than-significant VMT impact.

In consideration of these various screening criteria for major transit stop proximity, low-VMT area, and local-serving retail, the project would make a less-than-considerable contribution to the existing less than significant cumulative impact related to VMT in the Sacramento Central City area.

HAZARDS

The proposed project would result in increased travel activity, including bicycle, pedestrian, transit, and vehicle trips, that would be served by existing and planned facilities that would comply with applicable design standards addressing public safety. Any alterations or additions to the transportation network undertaken as part of other projects would also have to comply with applicable design standards, making a significant adverse cumulative impact related to transportation system hazards highly unlikely. In addition, the project would be consistent with the planned land use designation for the project site as identified in the 2040 General Plan, and thus would generate a volume, mix, and speed of traffic consistent with City of Sacramento expectations for planned roadways and transportation

facilities. Therefore, the proposed project would make a less-than-considerable contribution to any cumulative impact related to transportation system hazards.

EMERGENCY ACCESS

The proposed roadway and transportation network under the City of Sacramento 2040 General Plan and Central City Specific Plan would be designed to maintain high levels of accessibility and personal mobility. Central Sacramento has a grid network of streets to provide redundant connectivity. Many buildings have adjacent on-street and off-street parking areas that could be used by emergency responders. The project will be designed to meet emergency access requirements. The project site has multiple access points on 7th Street, 8th Street, 9th Street, and N Street, to allow emergency vehicles to use convenient and direct routes. Other project sites in the area also have and maintain multiple access points for emergency vehicles. Therefore, there is not a significant cumulative impact related to emergency access in the project area and the proposed project would make a less-than-considerable contribution to the cumulative impact

DEMOLITION/CONSTRUCTION TRAFFIC

The reasonably foreseeable projects in downtown Sacramento would result in construction vehicle trips that could overlap with construction of the project (e.g., the Downtown Riverfront Streetcar Project) as well as roadway disruptions in downtown. Although temporary, because of the magnitude of the projects, duration of construction, and the number of roadways affected, the cumulative construction-related traffic increases and potential roadway impacts would be cumulatively significant.

Demolition/construction traffic impacts for the project would be localized, primarily affecting 7th Street, 8th Street, 9th Street, Capitol Mall, and N Street in downtown Sacramento, and temporary. However, project demolition/construction activity would necessitate restriction or redirection of pedestrian, bicycle, and vehicular movements and loss of street parking around the site to accommodate demolition/construction staging, material hauling, material staging, and modifications to utility connections. In accordance with Section 12.20.20 of the Sacramento City Code, the project owner/operator would prepare and implement a Construction Traffic Management Plan that meets in coordination with the City traffic engineer. The traffic management plan would be designed to ensure acceptable operating conditions on local roadways and would reduce the project's temporary impact to the degree feasible. Other projects would also have to develop and implement construction traffic management plans in coordination with the City traffic engineer, minimizing the overall cumulative effect. Given the limited geographic scope of project construction effects on the transportation system, and the minimizing of effects through the implementation of a construction traffic management plan, the project would result in a less-than-considerable contribution to the significant cumulative construction traffic impacts.

5.3.4 Utilities and Service Systems

As indicated in Section 4.5, "Utilities and Service Systems," the project would generate less-than-significant impacts associated with all utility and infrastructure issues, including demands for water supply and delivery infrastructure, stormwater flows, increased demand for wastewater treatment and conveyance infrastructure, and increased demands for electricity and natural gas. In terms of cumulative impacts, the City of Sacramento is responsible for ensuring that water, wastewater, and stormwater conveyance are adequately provided within its jurisdictional boundaries and that development within the city limits can be adequately served by electrical and natural gas providers. The Sacramento 2040 General Plan identifies policies associated with providing water, wastewater, and stormwater conveyance; electricity; and natural gas to new development.

WATER

The City of Sacramento 2025 Urban Water Management Plan was prepared using information about planned growth included in the Sacramento 2040 General Plan. As shown in Table 4.5-6 of this Draft EIR, the City is projected to have sufficient water supplies to meet anticipated demands during normal, single-dry, and multiple-dry years through 2050. Therefore, cumulative impacts related to water supply availability are considered less than significant.

Abatement and demolition activities associated with the three state-owned buildings would not result in a substantial increase in water demand because the buildings would be vacated and disconnected from utility services prior to such activities. The additional water demand associated with future development, relative to historical full-occupancy conditions, would be approximately 374 acre-feet per year (afy). This represents less than 0.15 percent of the City's projected surplus water supply of 252,436 afy in 2030 and a little over 0.17 percent of the City's projected surplus water supply of 219,699 afy in 2050. Because the City's water supply planning already accounts for anticipated growth within Sacramento, including development consistent with the Sacramento 2040 General Plan, the project's demand would represent a small fraction of available supplies and would be accommodated within the City's existing and planned water supply portfolio. In addition, incorporation of water efficiency measures would further reduce water demands. For these reasons, significant cumulative impacts would not occur related to water supply and the project would not result in a considerable contribution to a cumulative water supply impact.

WASTEWATER

Stormwater/Wastewater Conveyance Facilities

Under historical full-occupancy conditions, the three state-owned office buildings generated approximately 53 afy of wastewater. Under current conditions, the buildings are estimated to generate approximately 2 afy of wastewater. Thus, wastewater generation at the project site under current conditions is substantially lower than it was when the buildings were at full occupancy. Based on the water demand analysis (i.e., assuming all water used on the site enters the wastewater system), future development would generate approximately 376 afy of wastewater at full buildout. Compared to the approximately 53 afy generated under historical full-occupancy conditions, future development would increase wastewater generation by approximately 323 afy.

Given the amount and type of planned future development relative to the existing office buildings, wastewater generation would increase compared to both full building occupancy and current conditions and could require larger, and potentially additional, wastewater conveyance pipelines connecting future buildings to the combined sewer system (CSS). Because the project site is already served by the CSS, new connections and modifications to existing connections may be required. Prior to construction, the entity implementing future development (e.g., Sacramento State) would coordinate with the City to determine the necessary improvements to the existing wastewater conveyance system.

Therefore, although future development would increase wastewater generation compared to current conditions, the project's wastewater flows would be accommodated through the City's existing planning and infrastructure improvement programs. Therefore, the project would not make a cumulatively considerable contribution to a cumulative impact on wastewater conveyance or treatment facilities.

Wastewater Treatment Facilities

Wastewater generated by the Capitol Mall Office Buildings Demolition Project would be treated at the EchoWater Facility. The City of Sacramento and Sacramento Area Sewer District (SacSewer) have an operating agreement that allows the City to convey up to 60 million gallons per day (mgd) to the EchoWater Facility. When flows exceed 60 mgd, wastewater in the CSS is conveyed to the Combined Wastewater Treatment Plant (CWTP) and Pioneer Reservoir for treatment and storage, if needed, before being discharged to the Sacramento River. Currently, the City conveys about 18 mgd to the EchoWater Facility; therefore, sufficient dry-weather treatment capacity exists to accommodate wastewater generated by the proposed project and other planned development. However, during peak storm events,

there is currently insufficient capacity in the CSS wastewater treatment plants to treat wastewater. This is considered a cumulatively significant condition.

Development anticipated under the Sacramento 2040 General Plan and other cumulative projects would contribute wastewater flows to facilities that serve the project area (e.g., EchoWater Facility, CWTP, and Pioneer Reservoir). Development of those related projects and associated utility infrastructure would be subject to environmental review and applicable City requirements. In addition, individual projects are required to provide adequate facilities or pay their fair share of the cost of infrastructure improvements needed to accommodate growth while maintaining service levels. The City is also implementing the Combined Sewer System Improvement Plan to make improvements throughout the system to address long-term wastewater conveyance and treatment needs associated with existing and future development.

The proposed project would contribute wastewater flows to the CSS and would be subject to applicable City requirements associated with connections to and improvements of the CSS. Because sufficient dry-weather treatment capacity exists to accommodate projected wastewater flows from the project, and because the project's wastewater contribution would be addressed through the City's existing planning and infrastructure improvement programs, the project would not make a cumulatively considerable contribution to the identified cumulative wastewater treatment impact.

Stormwater

The related projects considered in this cumulative analysis would be located within downtown Sacramento and could increase stormwater runoff to the CSS. Similar to the proposed project, these related projects would be required to comply with applicable City stormwater management requirements and demonstrate that stormwater runoff would not adversely affect the CSS. In addition, the related projects would undergo separate environmental review, as appropriate, to evaluate potential effects on drainage, stormwater, and wastewater infrastructure and ensure that adequate surface drainage facilities are included as part of those projects. Because the proposed project would not increase stormwater flows to the CSS and would comply with applicable stormwater management requirements, the project would not make a cumulatively considerable contribution to a cumulative impact on stormwater conveyance facilities.

Landfill Capacity and Compliance with Solid Waste Regulations

Implementation of the project, together with cumulative development throughout Sacramento, would increase the generation of solid waste and demand for solid waste disposal services. Future development would be required to comply with applicable State and local requirements for recycling and diversion of solid waste from landfills. State operations and new development are required to recycle a minimum of 50 percent of their operational waste in accordance with Assembly Bills 75 and 939. Construction activities are required to recycle and/or salvage a minimum of 65 percent of their waste in accordance with Section 5.408 of California's Green Building Code. In addition, the City has a policy to reduce the amount of solid waste that is disposed in landfills by promoting source reduction and recycling throughout Sacramento and by expanding the range of programs and information available to local residents and businesses, consistent with State requirements (Policy PFS-5.1).

The 2040 General Plan EIR identified sufficient regional landfill capacity to accommodate projected growth within the city and region through buildout (City of Sacramento 2023). Accordingly, landfill capacity planning already accounts for the increase in solid waste generation associated with cumulative development. Because sufficient landfill capacity is available and the project would be required to comply with applicable construction, demolition, and operational waste reduction requirements, the project's contribution to cumulative solid waste generation would not be cumulatively considerable.

Electricity and Natural Gas

The geographic area considered for cumulative impacts related to electricity and natural gas use includes the service areas of SMUD and PG&E. These utility providers plan for future growth and employ various programs and mechanisms to support the provision of electricity and natural gas services to new development. The project site is

already served by existing electrical and natural gas infrastructure, and future development would include reconnection to existing utility infrastructure in accordance with applicable utility requirements.

Cumulative development within the service areas of SMUD and PG&E would increase demand for electricity and natural gas. However, both SMUD and PG&E regularly forecast future demand and implement resource and infrastructure planning efforts to ensure adequate service for existing and future customers. In addition, future development associated with the project and cumulative projects would be required to comply with applicable building energy-efficiency standards, including Title 24 of the California Code of Regulations, which would reduce energy consumption compared to less efficient development.

Because electricity and natural gas providers plan for anticipated growth and future development would be subject to applicable energy-efficiency requirements, sufficient electricity and natural gas supplies are expected to be available to serve cumulative development. In addition, electricity and natural gas impacts of related projects would undergo separate environmental review to ensure that adequate electricity and natural gas supplies and infrastructure would be available to those projects. For these reasons, cumulative impacts related to electricity and natural gas would be less than significant. The project's contribution to cumulative energy demand would represent a small increment of regional demand and would not be cumulatively considerable.

5.3.5 Air Quality

The geographic context for cumulative impacts related to air quality is regional for criteria air pollutant and ozone precursors and includes the Sacramento Valley Air Basin (SVAB) and Sacramento County within the jurisdiction of the Sacramento Metropolitan Air Quality Management District (SMAQMD), and the context is local for toxic air contaminants (TACs) and odors. Cumulative development in the region will continue to increase the concentration of pollutants from construction activities, traffic, natural gas combustion in buildings, area sources, and stationary sources, but this increase would be partially offset by State and federal policies that set emissions standards for mobile and nonmobile sources.

Toxic air contaminants, carbon monoxide (CO) hotspots, and odor are localized impacts. There are no existing or planned land uses adjacent to the project site that would be a large stationary source of local TACs or odors. SMAQMD's CEQA Guide indicates that CO emissions are "predominately generated in the form of mobile-source exhaust from vehicle trips. These vehicle trips occur throughout a paved network of roads, and therefore, associated exhaust emissions of [CO] are not generated in a single location where high concentrations could be formed" (SMAQMD 2020: 4-7). A CO hotspot impact is not anticipated unless an intersection experiences more than 31,600 vehicles per hour. Cumulative traffic volumes at intersections near the project would not exceed 31,600 vehicles per hour. The reader is referred to Section 4.6, "Air Quality."

Ozone impacts are the result of cumulative emissions from numerous sources in the region and transport from outside the region. Ozone is formed in chemical reactions involving oxides of nitrogen (NO_X), reactive organic gases (ROG), and sunlight. All but the largest individual sources emit NO_X and ROG in amounts too small to have a measurable effect on ambient ozone concentrations by themselves. However, when all sources throughout the region are combined, they can result in cumulative ambient concentrations of ozone that exceed the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS).

Respirable particulate matter (PM_{10}) and fine particulate matter ($PM_{2.5}$) have similar regional cumulative impacts when particulates are entrained in the air and build to unhealthful concentrations over time. Operational PM_{10} and $PM_{2.5}$ are less likely to result in local cumulative impacts because operational sources of PM_{10} and $PM_{2.5}$ tend to be spread throughout the region (i.e., vehicles traveling on roads), not concentrating at one receptor.

In accordance with SMAQMD guidance, the project was evaluated quantitatively and compared to SMAQMD's daily mass emission thresholds of significance for consistency with the most recently adopted air quality plan in the region. These thresholds are inherently tied to long-term regional air quality planning and demonstrate that project generated demolition and construction emissions would not conflict with the applicable air quality plans after implementation of SMAQMD's best management practices (BMPs) for demolition and construction provided in

Mitigation Measure 4.6-1. However, emissions from project operations would exceed SMAQMD thresholds and would not be consistent with the applicable air quality plans.

Sacramento County and the SVAB are in nonattainment for ozone and PM_{10} with respect to the CAAQS and for ozone and $PM_{2.5}$ with respect to the NAAQS. Demolition and construction activities in the region would emit additional particulate matter and ozone precursors that may conflict with attainment efforts in the county. Because the region is in nonattainment, the existing cumulative condition is adverse, and any additional emissions would exacerbate that condition. However, SMAQMD has established construction emission thresholds for development projects that determine whether that particular project's emissions would be cumulatively considerable. As detailed in Section 4.6, "Air Quality," project demolition and construction emissions would exceed the applicable mass emission threshold established by SMAQMD. However, Mitigation Measure 4.6-1 requires the incorporation of construction emission BMPs that would reduce emissions. All other criteria air pollutants would remain below the SMAQMD thresholds. Of the cumulative projects evaluated in this EIR, the Subterranean Building Demolition is the only project located within 2,000 feet of the project site for construction activities to potentially overlap with project demolition or construction and could contribute to air quality impacts in the SVAB. Other cumulative projects would similarly be subject to SMAQMD's basic management practices for construction pursuant to Rule 403. Therefore, the Project's demolition- and construction-related contribution to criteria air pollutant or precursor emissions would not be cumulatively considerable.

However, as detailed in Section 4.6, "Air Quality," even with implementation of Mitigation Measures 4.6-2a and 4.6-2b, ROG emissions associated project operations would exceed SMAQMD thresholds and conflict with SMAQMD's efforts to attain and maintain the NAAQS and CAAQS. Therefore, project operation would make a cumulatively considerable contribution to the significant cumulative impact of SVAB nonattainment for ozone.

5.3.6 Greenhouse Gas Emissions and Climate Change

Climate change is a global problem. Greenhouse gases (GHGs) are global pollutants, unlike criteria air pollutants and TACs, which are pollutants of regional and local concern. Whereas most pollutants with localized air quality effects have relatively short atmospheric lifetimes (approximately 1 day), GHGs have long atmospheric lifetimes (1 year to several thousand years). GHGs persist in the atmosphere long enough to be dispersed around the globe. Although the lifetime of any GHG molecule depends on multiple variables and cannot be determined with any certainty, it is understood that more carbon dioxide (CO_2) is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, and other forms of sequestration. Of the total annual human-caused CO_2 emissions, 54 percent are estimated to be sequestered through ocean and land uptake every year, averaged over the last 50 years, whereas the remaining 46 percent of human-caused CO_2 emissions remain stored in the atmosphere (IPCC 2021: 682).

No single project alone would measurably contribute to an incremental change in the global average temperature or to global or local climates or microclimates. From the standpoint of CEQA, GHG impacts relative to global climate change are inherently cumulative.

As described in Section 4.7, "Greenhouse Gas Emissions and Climate Change," the discussion of GHG emissions associated with the project for Impact 4.7-1 is inherently a cumulative impact analysis. GHG emissions from one project cannot, on their own, result in changes in climatic conditions. Therefore, the emissions from one project must be considered in the context of their contribution to cumulative global emissions. Implementation of Mitigation Measures 4.7-1a, 4.7-1b, and 4.7-1c would reduce the project's GHG emissions but not to a less-than-significant level because full implementation of Mitigation Measures 4.7-1b and 4.7-1c cannot be assured and, therefore, the project cannot demonstrate consistency with SMAQMD's GHG significance criteria. Therefore, the project would make a cumulatively considerable contribution to the significant cumulative effect of climate change.

5.3.7 Energy

The geographic area considered for cumulative impacts related to energy use includes the Sacramento Municipal Utility District (SMUD) and Pacific Gas and Electric Company (PG&E) service areas. SMUD and PG&E employ various

programs and mechanisms to support the provision of electricity and natural gas services to new development and recoup costs of new infrastructure. Connection fees are typically charged through standard billing for services.

Several other currently planned and approved projects identified in Section 5.2.4 would also receive electricity service from SMUD and natural gas service from PG&E. These projects would also consume energy related to transportation (i.e., gasoline and diesel consumption for passenger vehicles, trucks, buses, and other vehicles) and construction. These projects would be required to implement energy efficiency measures in accordance with Part 6 of the Title 24 California Building Code (California Energy Code) to reduce energy demand from buildings. Impact 4.8-1 concludes that the project would not result in the wasteful or inefficient use of energy and by increasing development density in areas that already fall below per-capita VMT thresholds and are supported by nearby existing transit systems, future development could increase energy efficiency. There is no evidence, given the regulatory environment related to energy use in California, and the nature of the related projects (e.g., housing, transit, mixed use), to suggest that implementation of the identified cumulative development would result in a significant cumulative energy impact related to the wasteful or inefficient use of energy.

As discussed in Impact 4.8-2, due to the lack of available details regarding the project design, although it is presumed that future development implemented by Sacramento State would be consistent with the CSU Sustainability Policy, it cannot be assured that full compliance with the CSU Sustainability Policy would be achieved, such as including all-electric development or sufficient EV charging equipment. Because of this uncertainty, a determination of full consistency with the CSU Sustainability Policy cannot be confirmed based on the available information. Implementation of Mitigation Measure 4.8-2 would result in the Downtown Sacramento campus Master Plan, when developed, identifying a campus that would be consistent with the CSU Sustainability Policy. This consistency would be reviewed and validated as part of the CEQA analysis of the Master Plan and the validation would be a component of plan approval. Thus, with the implementation of Mitigation Measure 4.8-2, the project would align with the building energy efficiency goals of the CSU Sustainability Policy.

Proposed development surrounding the project site, as included in Section 5.2.4, would be subject to individual environmental analysis and mitigation for significant impacts and would be required to comply with federal, state, and local requirements related to energy, making a significant adverse cumulative impact related to obstructing State or local plan for renewable energy or energy efficiency highly unlikely. Overall, with implementation of Mitigation Measure 4.8-2, implementing the project would not result in the wasteful or inefficient use of energy and the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The project would not make a substantial contribution to cumulative energy impact.

5.3.8 Noise and Vibration

Noise and vibration are localized effects because noise and vibration levels generally attenuate with increasing distance from the source. Therefore, only reasonably foreseeable future development projects in the immediate vicinity of the Capitol Mall Office Buildings Demolition project site would have the potential to interact with project-generated noise and vibration and contribute to a cumulative noise or vibration impact. As discussed in Section 4.9, "Noise and Vibration," short-term (i.e. demolition/construction) noise and vibration impacts would be significant and unavoidable due to the potential for nighttime activities, and long-term (i.e., stationary noise sources) noise impacts would be less than significant with implementation of the identified mitigation measures.

The project would not result in long-term increases in transportation noise associated with project-generated traffic. Therefore, the cumulative analysis focuses on short-term construction and demolition noise and vibration, as well as stationary noise sources that would be introduced by the project.

Project-related construction and demolition activities would generate vibrations levels that exceed the Caltrans criterion of 0.08 peak particle velocity at 27 feet and the Federal Transit Administration's vibration criterion of 80 vibration decibels (VdB) at approximately 73 feet. The nearest cumulative projects evaluated in this EIR are the Subterranean Building Demolition Project and the Downtown Riverfront Streetcar Project. The Subterranean Building Demolition Project is located approximately 140 feet from the project boundary. At this distance, project-related

construction and demolition activities would not contribute to cumulative vibration impacts. Downtown Riverfront Streetcar Project activities in the vicinity of the project site would consist of tying the streetcar system into the existing lightrail tracks on N Street south of the EDD Annex Solar Building and the eastern portion of the EDD Headquarters Building. Any vibration generating activities would be minor, and even if combined with the proposed project, would not reach sensitive receptors. Thus, the Capitol Mall Office Buildings Demolition project would not result in substantial contribution to a significant cumulative vibration impact.

Project-related construction and demolition activities would generate noise levels during the daytime hours that range from 98.2 A-weighted decibels of equivalent noise level (dBA L_{eq})/104.6 dBA of maximum noise level (L_{max}) (at the construction location) to 54.2 dBA L_{eq}/60 dba L_{max} at 1,600 feet from equipment use. However, at further locations from the site, intervening buildings would provide reductions of 3-5 dB. Further, daytime construction activities are exempt from the City of Sacramento's noise code provisions. Regarding nighttime construction noise that has the potential to disrupt sleep, demolition/construction noise would exceed the nighttime standard of 50 dBA L_{eq} within 1,023 feet of equipment use. Of the cumulative projects evaluated in this EIR, the Subterranean Building Demolition Project and the Downtown Riverfront Streetcar Project are the only projects located close enough to the project site to interact regarding noise generation and could contribute to cumulative noise or vibration impacts.

Although demolition and construction noise from the proposed project could overlap with noise generated by the Subterranean Building Demolition Project or the Downtown Riverfront Streetcar Project, any overlap would be temporary and limited to the period during which two or more of the projects are actively undergoing demolition or construction within the vicinity of each other. Daytime construction for all three projects would be subject to City of Sacramento's Municipal Code exemption for construction. Therefore, simultaneous nighttime construction for more than one project would need to occur. It is unknown whether the Subterranean Building Demolition Project or the Downtown Riverfront Streetcar Project would require nighttime construction. However, given the general desire to avoid nighttime construction due to the heightened noise sensitivity, and the limited circumstances where nighttime construction may be needed (e.g., associated with the demolition of the 8th Street sky bridge for the proposed project, or large continuous concrete pours), it is highly unlikely that any of these three projects would conduct nighttime construction simultaneously. In addition, the identification of a disturbance coordinator for the proposed project as part of Mitigation Measure 4.9-1 would increase the potential that there would be coordination between the proposed project and nearby projects regarding the potential for, and avoidance of, simultaneous nighttime noise generation. Therefore, although project-level demolition and construction noise impacts would be significant and unavoidable due to the potential for nighttime activity, the Capitol Mall Office Buildings Demolition project would not result in a substantial contribution to a significant cumulative demolition- or construction-related noise impact.

The project would also introduce new stationary noise sources associated with its proposed uses. However, the Subterranean Building Demolition is expected to be developed with affordable housing, or other State uses (i.e., office buildings). The Downtown Riverfront Streetcar Project would introduce a use very similar to the existing lightrail lines already in operation in the downtown Sacramento area. These uses would not introduce substantial stationary noise-generating sources that would combine with the project's stationary sources to result in a cumulatively considerable increase in noise levels. Therefore, the Capitol Mall Office Buildings Demolition project would not result in a substantial contribution to a significant cumulative operational stationary source noise impact.

5.3.9 Geology and Soils

The geographic area considered for cumulative impacts related to geology and soils includes the City of Sacramento, specifically the Central City. As described in Section 4.10, "Geology and Soils," the project site is not located on any known faults or traces of active faults. However, the Sacramento region is subject to seismic ground shaking and may be affected by other geologic and soil hazards, including liquefaction, expansive soils, subsidence, and erosion. Development throughout the region could place additional people and structures in areas potentially subject to these hazards.

Future development within Sacramento, including cumulative projects, would be required to comply with applicable State and local requirements governing geologic hazards, including the California Building Code (CBC). The CBC contains requirements intended to reduce risks associated with seismic ground shaking and other geologic hazards through appropriate engineering and design standards. In addition, individual development projects are typically required to prepare site-specific geotechnical investigations to identify local soil and geologic conditions and recommend measures necessary to ensure safe construction and operation. Where site-specific hazards such as liquefaction, expansive soils, or unstable soils are identified, projects would be required to incorporate recommendations from geotechnical studies and comply with applicable grading and construction requirements.

Future development of the project site would also be required to comply with the CBC and would also be subject to site-specific geotechnical investigations and engineering recommendations. Through compliance with these requirements, impacts associated with seismic hazards, liquefaction, expansive soils, and other geologic conditions would be reduced to less-than-significant levels.

Although cumulative development throughout the region could increase the number of people and structures potentially exposed to seismic and geologic hazards, there are rarely opportunities for impacts from one project to interact with another project on a cumulative basis. Hazards related to seismicity, geology, and soils are site-specific and are addressed on a project-by-project basis through compliance with the CBC, implementation of geotechnical recommendations, and conformance with applicable grading and erosion-control requirements. Similar to other cumulative projects, future development on the project site would be required to implement these measures. Accordingly, the project would not make a substantial contribution to a cumulative geology and soils impact.

5.3.10 Hydrology and Water Quality

FLOOD PROTECTION

The geographic area considered for cumulative flood protection impacts includes the Sacramento River and the American River watersheds and the local drainage infrastructure serving downtown Sacramento. Flood control facilities, including levees and other flood protection improvements, are planned, operated, and maintained by local, regional, State, and federal agencies to provide flood protection for existing and future development throughout the region. As discussed in Section 4.11, "Hydrology and Water Quality," the project site is located in an area that is protected from the 1-in-100 Annual Exceedance Probability event (i.e., the 100-year flood) (see Figure 4.11-2).

Much of downtown Sacramento, including the project site and most cumulative development in the surrounding area, is located outside the 100-year floodplain because of completed flood protection improvements. Therefore, cumulative development would not result in a substantial reduction in available flood storage capacity or increase flood elevations through encroachment into the 100-year floodplain.

Cumulative development throughout the region could incrementally increase stormwater runoff during storm events. However, local jurisdictions require compliance with applicable drainage design criteria, stormwater detention requirements, runoff-control measures, and discharge standards intended to maintain acceptable drainage conditions and minimize flood hazards. In addition, demolition and future development activities would be required to comply with applicable stormwater management requirements, including preparation and implementation of a stormwater pollution prevention plan (SWPPP), which would include temporary erosion and sediment control measures. These requirements would reduce the potential for demolition and construction activities to result in substantial erosion, sedimentation, flooding, or additional sources of polluted runoff.

Although cumulative development could incrementally increase stormwater runoff, applicable drainage and stormwater management requirements are intended to ensure that flood protection facilities continue to function as designed. Similar to other cumulative projects, the proposed project would comply with these requirements and would not alter the flood control system or substantially increase impervious surface area relative to the existing developed condition of the site. Therefore, cumulative flood protection impacts would be less than significant, and

the Capitol Mall Office Buildings Demolition Project would not make a cumulatively considerable contribution to a cumulative flood protection or stormwater runoff impact.

GROUNDWATER QUALITY

Groundwater in the downtown Sacramento area is shallow, and regional groundwater quality concerns are primarily associated with urban and industrial contamination. There is no known groundwater contamination at the project site, and standard protective measures would be implemented if groundwater is encountered during demolition and future development. Future development throughout Sacramento and the region could involve excavation, dewatering, and other ground-disturbing activities with the potential to affect groundwater quality if not properly managed.

Projects that disturb one acre or more are required to obtain coverage under the State Construction General Permit, prepare and implement a SWPPP, and comply with permit requirements governing erosion control, pollutant management, and dewatering activities. In addition, projects in the city are subject to the City's Land Grading and Erosion Control Ordinance, which requires preparation and implementation of erosion, sediment, and pollution-control plans for construction and post-construction periods, and the City's Stormwater Management and Discharge Control Ordinance, which requires projects to minimize or eliminate sediment and pollutants in construction site stormwater discharges.

Construction activities associated with the Capitol Mall Office Buildings Demolition Project, including demolition of existing structures and construction of future development, could result in excavation and dewatering activities that have the potential to affect groundwater quality. However, the project would be required to comply with the National Pollutant Discharge Elimination System (NPDES) general permit for construction activity, prepare and implement a SWPPP and implement applicable erosion-control, pollutant-control, and dewatering measures. These requirements would minimize the potential for sediment or construction-related contaminants to enter groundwater.

The related projects would be developed at multiple locations with varying depths to groundwater, would generate varying degrees of construction and urban runoff, and would likely implement varying levels of best management practices that would protect groundwater. Because groundwater quality impacts associated with cumulative development are addressed through compliance with applicable federal, State, and local regulations and permit requirements, cumulative groundwater quality impacts would be less than significant. Similar to other cumulative projects, the Capitol Mall Office Buildings Demolition Project would be required to implement these measures; therefore, the project would not make a cumulatively considerable contribution to a cumulative groundwater quality impact.

SURFACE WATER QUALITY

Development throughout downtown Sacramento, including the proposed project and cumulative projects, has the potential to generate construction-related pollutants and urban runoff that could affect water quality within the City's CSS and downstream receiving waters. As discussed in Section 4.11, project-specific impacts associated with construction and operational water quality would be less than significant with implementation of applicable permit requirements and best management practices.

Stormwater from the project site that enters the City's CSS would continue to be treated at the EchoWater Facility, where flows are managed and treated consistent with applicable regulatory requirements before it is discharged to the Sacramento River. Because the proposed project site is currently developed, project implementation would result in little change to the type or volume of urban contaminants that could be discharged from the site. In addition, demolition and future development activities would be required to comply with applicable NPDES permit requirements, including preparation and implementation of a SWPPP containing construction-period best management practices.

Future development associated with the project would also be subject to the requirements of the City's municipal NPDES permit and associated Stormwater Quality Improvement Plan/Stormwater Management Program, which

require implementation of post-construction stormwater source-control and treatment-control measures. Similar requirements would apply to cumulative projects developed throughout the city.

Although cumulative development would increase the amount of urban development contributing runoff to the City's drainage system, applicable federal, State, and local stormwater regulations require implementation of source-control measures, treatment controls, and construction best management practices designed to protect water quality. Similar to other cumulative projects, the proposed project would be required to comply with these requirements and would not substantially alter the existing urbanized condition of the site. Therefore, cumulative surface water quality impacts would be less than significant, and the Capitol Mall Office Buildings Demolition Project would not make a cumulatively considerable contribution to a cumulative surface water quality impact.

5.3.11 Hazards and Hazardous Materials

The Capitol Mall Office Buildings Demolition Project and related projects would all involve the storage, use, disposal, and transport of hazardous materials to varying degrees during construction and operation. Impacts related to these activities would be less than significant under the Capitol Mall Office Buildings Demolition Project because the storage, use, disposal, and transport of hazardous materials are extensively regulated by various federal, State, and local agencies, and because it is assumed that all activities associated with the project and future development would comply with applicable hazardous materials regulations. Therefore, a significant impact related to hazards and hazardous materials would not occur. Because these laws and regulations would also apply to each related project, this impact would be less than significant on both an individual project and cumulative basis. Therefore, significant cumulative impacts are not anticipated. Implementation of the project would not incrementally contribute to a significant cumulative effect related to hazards and hazardous materials.

5.3.12 Cultural Resources

Cultural resources in the project region generally consist of precontact sites, historic sites, historic structures, and isolated artifacts. During the 19th and 20th centuries, localized urbanization and intensive agricultural use in the region resulted in the destruction or disturbance of numerous precontact sites while many structures now considered to be historic were erected. From the latter half of the 20th century to the present, precontact and historic structures have been disturbed and destroyed. During this period, the creation and enforcement of various regulations protecting cultural resources have substantially reduced the rate and intensity of these impacts; however, even with these regulations, cultural resources are still degraded or destroyed as cumulative development in the region proceeds.

ARCHAEOLOGICAL RESOURCES

As-yet-undiscovered subsurface historic and precontact archaeological resources might underlie the project site. Mitigation measures are identified for Impact 4.13-2 of this Draft EIR to reduce potential impacts on significant historic and precontact archaeological resources and human burials to a less-than-significant level. Implementing these mitigation measures would minimize the potential for the proposed project to incrementally contribute to any significant cumulative impacts on important archaeological and tribal cultural resources in the project region.

Mitigation measures applied to the project comply with State CEQA Guidelines Section 15064.5 and related provisions to the Public Resources Code. It is assumed that similar measures would be applied to other development projects in the region, as appropriate. Where federal agency approvals are required to implement projects, additional protection would be required under the National Historic Preservation Act.

Because the proposed project only includes minor, isolated ground disturbance associated with the demolition of the existing buildings, it is unlikely that intact archaeological resources would be encountered, and implementation of Mitigation Measure 4.13-2 would reduce any potentially significant project impacts. Although ground-disturbing activities associated with future development could result in damage to unknown archaeological resources,

implementation of Mitigation Measure 4.13-2 would reduce any potentially significant project impacts. Therefore, significant cumulative impacts are not anticipated. Implementation of the project would not incrementally contribute to a significant cumulative effect on archaeological resources.

HISTORIC STRUCTURES

Although there are various laws and regulations directed at the protection of historic structures, significant historic structures have been and will continue to be damaged or removed over time. Even with implementation of Mitigation Measures 4.13-1a through 4.13-1g and compliance with existing policies and regulations, the proposed project, and presumably some reasonably foreseeable future projects, would contribute to an ongoing significant cumulative loss and degradation of historic structures. The project's combination of the complete physical demolition of the EDD Headquarters Building and the State Personnel Board Building, which are contributors to the California State Government Building District and the Capitol Mall State Building District historic districts, and the potential for vibration damage during construction activities, would result in a substantial adverse change per State CEQA Guidelines Section 15064.5(b)(2)(A) because they would materially impair physical characteristics of the Capitol Mall State Building District that help convey its historical significance and qualify it for listing in the NRHP. Therefore, the project would result in a significant impact on the California State Government Building District and the Capitol Mall State Building District historic districts. Mitigation Measures 4.13-1a and 4.13-1b require the documentation of the historical resources that will be affected by the proposed project; California State Government Building District and the Capitol Mall State Building District historic districts. Implementation of Mitigation Measure 4.13-1c through 4.13-1g would reduce potential impacts on the Sutter Club by requiring the installation and use of protective barriers during demolition and construction activities to prevent falling debris or materials from damaging the historic resource; requiring monitoring and controlling vibration to prevent structural damage; and by requiring repair of any inadvertent damage, including any damage to character defining features according to Secretary of the Interior's Standards for the Treatment of Historic Properties. Although implementation of Mitigation Measures 4.13-1a through 4.13-1g would help protect and preserve the Sutter Club, which is adjacent to the project site, the demolition of contributors to the California State Government Building District and the Capitol Mall State Building District historic districts would remain significant and unavoidable. Accordingly, the project's contribution to the cumulative loss and degradation of historic structures would be cumulatively considerable.

5.3.13 Tribal Cultural Resources

The cumulative context for the analysis of Tribal cultural resources considers a broad regional system of which the resources are a part. The cumulative context for Tribal cultural resources is the former territory of the Valley Nisenan and Plains Miwok. Nisenan territory included the drainages of the Bear, American, Yuba, and southern Feather rivers. The Plains Miwok lived in the Sacramento Valley along the Sacramento, Cosumnes, and Mokelumne rivers.

Because all significant Tribal cultural resources are unique and nonrenewable members of finite classes, meaning there are a limited number of significant Tribal cultural resources, all adverse effects erode a dwindling resource base. Tribal cultural systems are represented by the total inventory of all sites and other remains in the region. As a result, a meaningful approach to preserving and managing cultural resources must focus on the likely distribution of Tribal cultural resources, rather than on a single project or parcel boundary.

The historical lands of the Valley Nisenan and Plains Miwok people have been affected by development since the early 1800s as part of Spanish settlement and missionization and through the steady influx of nonnative people during the 1850s Gold Rush. Development of the Valley Nisenan and Plains Miwok lands continued with the completion of the Central Pacific Railroad in 1862 and continued expansion of railroad operations through the early 1900s. Residential growth increased after World War I and then greatly intensified after World War II. These activities have resulted in an existing significant adverse effect on Tribal cultural resources. Cumulative development continues to contribute to the disturbance, degradation, and loss of Tribal cultural resources.

Proper planning and appropriate mitigation can help to capture and preserve knowledge of such resources and can provide opportunities for increasing our understanding of the past environmental conditions and cultures by recording data about sites discovered and preserving artifacts found. Federal, state, and local laws are also in place that protect these resources in most instances. Even so, it is not always feasible to protect these resources, particularly when preservation in place would make projects infeasible, and for this reason the cumulative effects of past and present projects in the City of Sacramento could result in a potentially significant cumulative impact on Tribal cultural resources.

The project would not result in a substantial adverse change in the significance of the Tribal cultural landscape (P-34-005225) during demolition activities. Implementation of Mitigation Measures 4.14-1a through 4.14-1c would ensure that the proposed project's contribution to cumulatively significant Tribal cultural resources impacts would not be considerable by level by requiring construction training for awareness and sensitivity for Tribal cultural resources, Tribal monitoring of ground disturbance, and protection of any previously undocumented significant Tribal cultural resources. Therefore, demolition activities would not incrementally contribute to a significant cumulative effect on Tribal cultural resources.

For future redevelopment activities, Mitigation Measures 4.14-1a through 4.14-1c would substantially reduce the potential for adverse effects on Tribal cultural resources; however, because the specific design and extent of future ground disturbance are not currently known, it cannot be determined with certainty that impacts would be fully avoided or reduced to a less-than-significant level. Therefore, future redevelopment could incrementally contribute to a significant cumulative effect on Tribal cultural resources, and cumulative impacts would be significant and unavoidable.

5.3.14 Biological Resources

Sensitive habitats for biological resources in the vicinity of the project site and in the region have been modified over time as land has been developed and converted to urban uses. Cumulative projects listed above consist of infill development in the Central City consistent with the State's CAP and the City's 2040 General Plan; however, although individual projects would be required to mitigate for significant impacts on a project-by-project basis, they may result in residual impacts that combine to create a significant and adverse cumulative condition related to special-status species and sensitive habitats. The Capitol Mall Office Buildings Demolition Project site and vicinity are located in highly urbanized downtown Sacramento. As discussed in Section 4.15, "Biological Resources," no sensitive habitats occur on the project site, the project site neither connects nor separates any significant wildlife habitat areas, and implementation of the project would not disrupt wildlife movement or use of migratory corridors.

No special-status plants occur on the project site and only limited suitable habitat for sensitive wildlife species is present (see Tables 4.15-1 and 4.15-2). Project impacts include potentially significant impacts on nesting Swainson's hawks, other nesting raptors, other native nesting birds, and bat roosts. Mitigation Measures 4.15-2 and 4.15-3 would reduce potential adverse effects on these species and suitable habitats to a less-than-significant level because active nests would be identified during pre-activity surveys, active nest trees would not be removed until the young have fledged, no-disturbance buffers would be implemented to avoid indirect disturbance to active nests, bat roosts and maternity colonies would be identified, maternity colonies would be protected while females are nursing young, and bats would be excluded from buildings prior to demolition activities. Similar mitigation measures would be required for cumulative projects with the potential to affect nesting birds, raptors, or bat roosts, thereby reducing related cumulative impacts.

Implementation of the proposed project would result in a potentially significant impact related to removal or disturbance of "City trees." This impact would be reduced to a less-than-significant level with implementation of Mitigation Measure 4.15-4 which requires protecting existing City trees, providing replacement trees where appropriate. and complying with the City's Tree Preservation Ordinance. Cumulative projects involving removal or disturbance of protected trees would be subject to similar tree-protection and replacement requirements, reducing their contribution to cumulative impacts related to trees.

Because the project would either have no impact on biological resources, or a less-than-significant impact with implementation of mitigation, it would not make a considerable contribution to an adverse cumulative condition with respect to biological resources.

5.3.15 Public Services and Recreation

Public services for related projects in Sacramento would be provided by the City and the appropriate service providers. The following analysis focuses on public services provided in Sacramento because, other than mutual aid agreements for fire protection, there is little interaction with the neighboring jurisdictions in terms of demand for and provision of public services. The City and the appropriate service providers are responsible for ensuring adequate provision of public services within their jurisdictional boundaries. Cumulative development described in Section 5.2.4, "Related Projects," would result in continued development in downtown Sacramento. This cumulative growth would place additional demand on existing public services, resulting in a potentially significant cumulative impact.

Buildout of the Sacramento 2040 General Plan and other planned development in the region would increase demand for public services and recreational facilities. As discussed in the Sacramento 2040 General Plan, population and employment growth would require additional fire protection, law enforcement, schools, and park and recreation services. The 2040 General Plan includes policies and implementation measures to accommodate this growth, including the expansion of fire and police services, coordination with school districts regarding future school capacity, and enhancement and expansion of park and recreation facilities. Environmental effects associated with the construction and operation of these facilities were evaluated in the 2040 General Plan EIR.

Future development of the project site could include academic, residential, hospitality, commercial, entertainment, parking, and related uses totaling approximately 3,630,000 gross square feet. In combination with other cumulative development, these uses could increase demand for fire protection, law enforcement, school services, and recreational facilities. At buildout, the project site is expected to accommodate approximately 5,960 employees, students, and staff on a regular basis as well as visitors and event attendees associated with retail, entertainment, arts, and event venue uses (see Table 4.16-2 in Section 5.3.15, "Public Services and Recreation").

Future development would increase demand for fire protection and law enforcement services; however, service demands would be accommodated through existing service provider planning, compliance with applicable fire and building codes, implementation of required fire protection features, and coordination with the Sacramento Fire Department and other applicable service providers during project review. Development would occur within an urbanized area already served by existing public safety infrastructure, and implementation of the project would not require construction of a new fire station, police station, or other public safety facility.

Future development would also generate limited demand for public schools. For the purposes of this analysis it is estimated that up to 150 units among the 1,250 total housing units would be multi-bedroom units that would accommodate families with children. Based on applicable student-generation rates, the project would generate approximately 40 K-12 students (see Table 4.16-3 in Section 5.3.15, "Public Services and Recreation"). Although cumulative growth throughout the city may require additional school facilities over time, the project's contribution to student enrollment would be minimal and would not require construction or expansion of school facilities. Any students generated by the project would be accommodated through Sacramento City Unified School District enrollment assignment procedures, districtwide capacity management, and future facilities planning.

Cumulative growth would also increase demand for parks and recreational facilities. The Sacramento 2040 General Plan and Parks Plan 2040 identify existing park service-level deficiencies and recognize that future growth may increase use of parks, particularly within the Central City. However, the project site is located in an urban area served by numerous existing parks and recreational resources, including Capitol Park, César Chávez Plaza, Roosevelt Park, and other nearby facilities. While future development would increase recreational demand through the introduction of new residents, students, employees, visitors, and event attendees, the increase in use would be distributed among existing recreational resources and would not substantially accelerate the physical deterioration of those facilities. In

addition, applicable General Plan policies, Parks Plan policies, and development funding mechanisms are intended to accommodate cumulative growth in recreational demand.

Therefore, although the project would contribute incrementally to cumulative demand for public services and recreational facilities, it would not require new or physically altered public service or recreational facilities beyond those already anticipated to serve planned growth. Accordingly, the project's contribution to cumulative impacts on public services and recreation would not be cumulatively considerable.

5.3.16 Aesthetics, Light, and Glare

Past development in the region along I-5, US 50, and Sacramento River viewsheds has increasingly changed the visual character from undeveloped land to developed urban uses, thus altering and limiting the views available to residents, recreationists, and motorists. Cumulative projects listed above include several new and renovated buildings in various stages of planning or construction in downtown Sacramento that contribute to the urbanized character. This trend is anticipated to continue as future projects are implemented in the region, continuing to alter visual conditions as open viewsheds are replaced by urban development. Downtown Sacramento is an urban environment with a mix of low-rise, midrise, and high-rise buildings and widespread, ambient light. Building materials and cars generate some glare; however, mature trees in the downtown area help minimize glare. Increased urban development in downtown Sacramento and nearby West Sacramento would lead to alterations in the skyline, disruption of existing views, increased nighttime light and glare in the region, and more limited views of the night sky.

The Capitol Mall Office Buildings Demolition Project would not make a substantial contribution to the cumulative changes in visual character, light, or glare in the region because the project would replace three existing state-owned buildings with future buildings. Although there is potential for the future buildings to be taller in height than the three existing state-owned buildings, they would not exceed the maximum height limit established in the Capitol View Protection Act. Further, these changes would occur within a highly urbanized downtown setting characterized by mid-rise and high-rise development and would be consistent with the scale and character of surrounding development. The proposed project is located amid a mix of low-rise, mid-rise, and high-rise buildings and it would comply with the CAP design objectives and guidelines, as well as the City's Central City Urban Design Guidelines to the greatest degree possible. Therefore, the local visual character, as experienced by viewer groups in the area, would not be substantially altered by replacing the existing state-owned buildings with future buildings. Future development would be required to meet the lighting and glare standards contained in the CALGreen Code that limit light and glare, including reflectance from the proposed solar panels. Because the project would comply with standards for reducing light pollution and would avoid the use of highly reflective architectural materials for building design, project implementation would not create a new source of substantial light and glare that would adversely affect daytime or nighttime views in the area.

Because no significant cumulative aesthetic impact would occur and the project would result in less-than-significant visual impacts, implementation of the project would not incrementally contribute to a significant cumulative effect on aesthetics, light, or glare.

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6 OTHER CEQA SECTIONS

6.1 GROWTH INDUCEMENT

California Environmental Quality Act (CEQA) Section 21100(b)(5) specifies that the growth-inducing impacts of a project must be addressed in an environmental impact report (EIR). Section 15126.2(d) of the State CEQA Guidelines provides the following guidance for assessing growth-inducing impacts of a project:

> Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a wastewater treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also, discuss the characteristics of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

A project can induce growth directly, indirectly, or both. Direct growth inducement would result if a project involved construction of new housing. Indirect growth inducement would result, for instance, if implementing a project resulted in any of the following:

- substantial new permanent employment opportunities (e.g., commercial, industrial, or governmental enterprises);
- substantial short-term employment opportunities (e.g., construction employment) that indirectly stimulates the need for additional housing and services to support the new temporary employment demand; and/or
- removal of an obstacle to additional growth and development, such as removing a constraint on a required public utility or service (e.g., construction of a major sewer line with excess capacity through an undeveloped area).

Growth inducement itself is not an environmental effect but may foreseeably lead to environmental effects. If substantial growth inducement occurs, it can result in secondary environmental effects, such as increased demand for housing, demand for other community and public services and infrastructure capacity, increased traffic and noise, degradation of air or water quality, degradation or loss of plant or animal habitats, conversion of agricultural and open-space land to urban uses, and other effects.

6.1.1 Growth-Inducing Impacts of the Project

As described in Chapter 3, "Project Description," the project would remove three underutilized state-owned office buildings in downtown Sacramento and allow for future development of other uses on the project site. At peak capacity, the Employment Development Department (EDD) Headquarters, the EDD "Solar Building" Annex, and the State Personnel Board Building supported 2,658 employees. These buildings are currently largely vacant with 86 employees remaining after employees were relocated to support more efficient use of office spaces. As evaluated herein, the project would result in demolition of the buildings and possible transfer of the site to the Board of Trustees of the California State University (CSU), which is the State of California acting in its higher education capacity, for use by the California State University, Sacramento (Sacramento State) for a downtown campus and related uses. Future land uses would include a mix of academic, residential, hospitality, commercial, entertainment, parking, and related uses, resulting in approximately 3,200 employees and approximately 2,750 residents, consisting of 750 students and 2,000 permanent residents (see Table 4.3-5 in Section 4.3, "Population, Employment, and Housing").

GROWTH-INDUCING EFFECTS OF DEMOLITION

The abatement and demolition of the three Capitol Mall buildings would occur in phases over about 18 months, each requiring a different sized labor force. During peak demolition activity, the project is estimated to generate approximately 55 temporary construction jobs. As described in Section 4.3, "Population, Employment, and Housing," the latest labor data available from EDD indicate that approximately 45,900 residents in Sacramento County were employed in the construction industry in 2024 (EDD 2026). This number of residents in the construction labor force ("labor force" is defined as all those people who are employed or are looking for employment), coupled with those of other areas within commute distance (e.g., Yolo, Placer, and El Dorado Counties), would be sufficient to meet the demand for workers that would be generated by project demolition.

Construction jobs supporting the proposed project would be temporary, and it is the nature of construction work that construction contractors bid and work on projects based on their availability and need for work, and in regions that are accessible to their workforce. As construction projects near completion, contractors seek out new construction projects to maintain employment for the same workers. Although it is possible that some construction workers could move to the city or the region as a result of the proposed project and the cumulative projects, the existing labor force is anticipated to be sufficient to meet construction employment needs for these projects. Furthermore, the Sacramento 2040 General Plan anticipates continued growth in jobs and includes policies, such as Policy LU 2.1, that encourage a balance between job type, the workforce, and housing development to reduce the negative impacts of long commutes and provide a range of employment opportunities for all city residents.

For these reasons, neither substantial population growth nor increases in housing demand in the region would occur as a result of project-related demolition jobs. Therefore, the project would not directly induce population growth by bringing substantial numbers of construction jobs to the area or to result in associated increases in demand for housing or goods and services.

GROWTH-INDUCING EFFECTS OF FUTURE SITE DEVELOPMENT

Following building demolition, the site would be developed by Sacramento State. Project elements include a School of Public Affairs with innovation center and additional academic or cultural uses, student housing, a conference and event center, hotel, indoor performing arts and music venue, market rate apartments, ground floor retail, commercial office space, and structured parking. Like building demolition, construction of the future development is expected to draw from the substantial construction labor pool within Sacramento County and the region. The number of construction workers would vary by phase of construction but is estimated to reach approximately 325 at the peak of construction activity. This number of workers is not substantial given the nearly 46,000 Sacramento County residents in the construction industry, let alone the wider region within commute distance. The project would not require additional construction employees such that it would induce substantial unplanned population growth in an area.

Once operational, future land uses would result in an increase in employment and permanent residents to the project site and area. While the future development details are not finalized, it is estimated that the project would support up to 3,200 new employees and house approximately 750 students and 2,000 residents in the market rate apartments, for a total new population of 2,750 (see Table 4.3-5 in Section 4.3, "Population, Employment, and Housing").

Because the project site is located in downtown Sacramento, and the future development would replace substantial existing development, the site is already adequately served by a regional highway and local roadway network, and sizeable utilities infrastructure. No new roadways or infrastructure that could serve growth beyond the project would be constructed. The future development would connect to existing City of Sacramento water supply, the City's combined sewer system (CSS), and other existing utility infrastructure (e.g., electricity, natural gas). As described in Section 4.5, "Utilities and Service Systems," some water supply and CSS improvements may be required to serve the future development, but these would be localized and tailored to the downtown campus. The upgrades necessary to serve the project would not provide excess capacity or open new areas to growth.

As described above, development of future uses could result in approximately 3,200 new employees and 2,750 new residents to the area. While the project itself would result in the stated residential and employment growth, and result in greater building square footage within the project site, no element of the project would remove obstacles to growth such that additional, unplanned growth would occur. Moreover, while the State is not obliged to comply with local land use plans and policies, the permanent population increase of about 2,000, student resident population of about 750, and intensification of uses on the project parcels is not inconsistent with the City's Downtown Specific Plan, which envisions a dynamic downtown core that will continue to function as the commercial, civic, retail, and entertainment hub for the city and surrounding region. It encourages new residential uses to enhance activity in the Central Business District by extending the hours of activity and strengthening the customer base for retail, services, and entertainment. Therefore, the level of growth brought about by the project would be in accord with local and regional plans and would not be considered growth inducing.

6.2 SIGNIFICANT AND UNAVOIDABLE ADVERSE IMPACTS

The State CEQA Guidelines Section 15126.2(b) requires EIRs to include a discussion of the significant environmental effects that cannot be avoided if the proposed project is implemented. As documented throughout Chapter 4, "Environmental Impacts and Mitigation Measures," and Chapter 5, "Cumulative Impacts," of this Draft EIR, after implementation of the recommended mitigation measures, most of the impacts associated with the proposed Capitol Mall Office Buildings Demolition Project would be reduced to a less-than-significant level. The following impacts are considered significant and unavoidable; that is, no feasible mitigation is available to reduce the project's impacts to a less-than-significant level.

6.2.1 Transportation and Circulation

Impact 4.4-1: Conflict with a Program, Plan, Ordinance, or Policy Addressing the Circulation System, Including Transit, Roadway, Bicycle, and Pedestrian Facilities

Implementation of the project could potentially physically disrupt existing pedestrian facilities, bicycle facilities, and transit services and facilities. Disruptions could occur during typical daily operations as well as during event days. Additionally, the project may interfere with the planned Downtown Riverfront Streetcar Project. This impact would be significant and unavoidable.

Implementation of Mitigation Measures 4.4-1a, 4.4-1b, and 4.4-1c would reduce adverse effects associated with this impact.

For Mitigation Measure 4.4-1a, the event transportation management plan (ETMP) would identify and implement traffic management techniques to address special event conditions. However, because the ETMP has not yet been drafted or finalized, it cannot yet be determined that it would fully address temporary physical disruptions to the transportation system surrounding the project site. In addition, completing the ETMP would involve collaboration with other parties such as the California Department of Transportation (Caltrans) and the Sacramento Regional Transit District (SacRT), adding further uncertainty to the final outcome. Because of uncertainties with regard to impacts to traffic operations and queuing, transit lane closures, and other transportation topics, implementation of Mitigation Measure 4.4-1a would not reduce this impact to a less-than-significant level.

For Mitigation Measure 4.4-1b, the improvements necessary to improve transit performance would require further planning and implementation by the entity conducting redevelopment (e.g., Sacramento State) and coordination with SacRT and the City of Sacramento. Similar to Mitigation Measure 4.4-1a, the effectiveness of the transportation demand management (TDM) strategies cannot be confirmed at this time and subsequent vehicle trip reduction effects and reductions to delays to transit cannot be guaranteed. Therefore, implementation of Mitigation Measure 4.4-1b would not reduce this impact to a less-than-significant level.

For Mitigation Measures 4.4-1c, further planning and implementation by the entity conducting redevelopment (e.g., Sacramento State) and coordination with SacRT and the City of Sacramento are necessary to determine the appropriate modifications that would fully address potential conflicts between the project and the surrounding transportation system. Therefore, the efficacy of these mitigation measures is uncertain and implementation of Mitigation Measure 4.4-1c would not reduce this impact to a less-than-significant level.

Due to the lack of detail regarding future project information and a specific development site plan (e.g., locations of vehicle entry and exit points), a detailed identification of project-level impacts is unable to be conducted. The exact nature of a significant impact, the physical and operational modifications necessary to address a significant impact, and whether the entity conducting redevelopment (e.g., Sacramento State) and other involved entities (including SacRT and the City) would be able to mutually agree upon the physical and operational modifications necessary to fully mitigate the impact have not been determined. Due to these uncertainties, this impact would remain **significant and unavoidable**.

Impact 4.4-5: Result in Demolition/Construction Activity that Could Cause Temporary Impacts to Transportation and Traffic

Demolition- and construction-related traffic impacts would be localized and temporary. Project demolition and construction activity would necessitate restriction or redirection of pedestrian, bicycle, and vehicular movements to accommodate construction staging, material hauling, material staging, and modifications to utility connections. DGS and the entity implementing future re-development (e.g., Sacramento State) would prepare and implement a construction traffic management plan to reduce the temporary impacts to the degree feasible. However, the project would cause temporary physical disruptions to light rail and bus transit service and operations that would not be remedied by the construction traffic management plan and mitigation actions. Therefore, construction-related impacts on transportation and traffic would be significant.

Implementation of Mitigation Measure 4.4-5a would reduce the significance of this impact by providing alternative transit service options to light rail and bus service that would be disrupted by project demolition and construction activities. However, the alternative transit service options would be subject to coordination with others such as SacRT and the City of Sacramento and it cannot be guaranteed at this time that they would be implemented. Therefore, it cannot be assured that Mitigation Measure 4.4-5a would reduce this impact to a less-than-significant level.

Implementation of Mitigation Measure 4.4-5b would reduce the significance of this impact by reducing potential conflicts between the project demolition and Downtown Riverfront Streetcar Project construction activities. However, this mitigation measure is subject to coordination with others such as the City of Sacramento and SacRT. Because of uncertainty regarding the outcome of this coordination with other entities, it cannot be assured that Mitigation Measure 4.4-5b would reduce this impact to a less-than-significant level.

Because DGS, or a future entity implementing site redevelopment (e.g., Sacramento State), cannot guarantee that these modifications would be implemented due to the participation of other agencies, this impact would be **significant and unavoidable**.

6.2.2 Air Quality

Impact 4.6-1: Conflict with or Obstruct Implementation of an Applicable Air Quality Plan

The project would exceed the Sacramento Metropolitan Air Quality Management District's (SMAQMD) numerical thresholds which are designed to attain and maintain the national ambient air quality standards (NAAQS). This would conflict with SMAQMD's efforts to attain and maintain the NAAQS and the California ambient air quality standards (CAAQS) through its air quality plans and this impact would be significant.

Regarding demolition and construction emissions, with implementation of SMAQMD's fugitive dust best management practices (BMPs), the emissions thresholds for respirable PM with an aerodynamic diameter of 10

micrometers or less (PM_{10}) and fine PM with an aerodynamic diameter of 2.5 micrometers or less ($PM_{2.5}$) would be 80 pounds per day (lb/day) or 14.6 tons per year (tpy) of PM_{10} and 82 lb/day or 15 tpy of $PM_{2.5}$. The dust control measures outlined in Mitigation Measure 4.6-1 would reduce impacts related to fugitive dust emissions by reducing dust generated by vehicle movement through the watering of exposed surfaces and limiting vehicle speeds on unpaved roads, reducing the potential for dust to escape hauling trucks by placing covers over the truck beds when on major roadways, wet-vacuuming mud/dirt tracked onto public roadways, and completing high-movement areas (e.g. roadways, sidewalk, and parking lots) as soon as possible to reduce the amount of unpaved surfaces that could result in dust generation. As shown in Tables 4.6-4 and 4.6-5 (in Section 4.6, "Air Quality"), with implementation of SMAQMD's BMPs identified in Mitigation Measure 4.6-1, the PM_{10} and $PM_{2.5}$ emissions associated with demolition and construction activities would not exceed applicable thresholds.

Regarding emissions of reactive organic gases (ROG), as discussed above, there is no mitigation that can be implemented to reliably reduce the use of consumer products to minimize ROG emissions below a significant level. Thus, operational emissions associated with future development would continue to exceed SMAQMD's thresholds and conflict with SMAQMD's efforts to attain and maintain the NAAQS and CAAQS. This impact would be **significant and unavoidable** even after implementation of mitigation.

Impact 4.6-2: Result in a Cumulatively Considerable Net Increase of Any Criteria Pollutant for Which the Project Region is Non-attainment Under an Applicable Federal or State Ambient Air Quality Standard

Demolition and construction activities would result in emissions that would exceed SMAQMD thresholds for PM_{10} and $PM_{2.5}$ (i.e., 0 lb/day and 0 tpy) because SMAQMD's construction BMPs are not included as part of the project. Additionally, operation of future development would generate operational emissions of ROG, oxides of nitrogen (NO_X), and PM_{10} that would exceed SMAQMD thresholds. Therefore, this impact would be significant.

Regarding demolition and construction emissions, with implementation of SMAQMD's fugitive dust BMPs, the emissions thresholds for PM_{10} and $PM_{2.5}$ would be 80 lb/day or 14.6 tpy of PM_{10} and 82 lb/day or 15 tpy of $PM_{2.5}$. The dust control measures outlined in Mitigation Measure 4.6-1 would reduce impacts related to fugitive dust emissions by reducing dust generated by vehicle movement through the watering of exposed surfaces and limiting vehicle speeds on unpaved roads, reducing the potential for dust to escape haul trucks by placing covers over the truck beds when on major roadways, wet-vacuuming mud/dirt tracked onto public roadways, and completing high-movement areas (e.g. roadways, sidewalk, and parking lots) as soon as possible to reduce the amount of unpaved surfaces that could result in dust generation. As shown in Tables 4.6-4 and 4.6-5 (in Section 4.6, "Air Quality"), with implementation of SMAQMD's BMPs identified in Mitigation Measure 4.6-1, the PM_{10} and $PM_{2.5}$ emissions associated with demolition and construction activities would not exceed applicable thresholds.

Regarding operational emissions, General Plan Policy ERC-4.7, "Operational Emissions," states that development projects that exceed SMAQMD's ROG and NO_X operational thresholds to incorporate design or operational features that reduce emissions equal to 15 percent from the level that would be produced by an unmitigated project. As shown in Table 4.6-7 (in Section 4.6, "Air Quality"), the project would continue to exceed SMAQMD's operational thresholds following the application of the 15 percent reduction to ROG and NO_X emissions. The specific design features that would be implemented to achieve a 15 percent reduction would be decided on as part of the project design process. Potential design features to reduce operational ROG and NO_x emissions could include, but are not limited to, implementation of a TDM plan to reduce VMT, use of all-electric landscaping equipment, and features to support walking and biking such as additional bike storage or electric bike charging options.

Mitigation Measures 4.6-2a and 4.6-2b would collectively reduce area-source emissions generated by landscaping and architectural coatings by prohibiting the use of gasoline-powered landscape equipment during operation and by requiring that all operational architectural coating activities use low-VOC (i.e., ROG) coatings, respectively. However, as discussed above, there is no feasible mitigation that can be implemented to reliably reduce the use of consumer products, which also contribute toward areawide emissions, and it cannot be guaranteed that implementation of

Mitigation Measures 4.6-2a and 4.6-2b would be sufficient to reduce area source ROG emissions below a significant level. Thus, this impact would be **significant and unavoidable** even after implementation of mitigation.

6.2.3 Greenhouse Gas Emissions and Climate Change

Impact 4.7-1: Generate GHG Emissions, Either Directly or Indirectly, That May Have a Significant Impact on the Environment or Conflict with or Obstruct a GHG Reduction Plan

Demolition activities would not generate greenhouse gas (GHG) emissions that would exceed SMAQMD's 1,100 metric tons of carbon dioxide equivalent per year ($MTCO_2e$/year) construction threshold. It is estimated that construction of new development would exceed the SMAQMD's 1,100 $MTCO_2e$/year construction threshold during some construction years. At this time, the development scenario is not sufficiently advanced to confirm that future development would be designed to be all-electric or include Green Building Standards Code (CALGreen Code) Tier 2-compliant electric vehicle (EV) chargers and, thus, it cannot be confirmed that it would meet the requirements of SMAQMD's Tier 1 BMPs. This impact would be potentially significant.

Abatement and demolition activities would not generate GHG emissions that would exceed SMAQMD's 1,100 $MTCO_2e$/year construction threshold. Therefore, the GHG emissions impact from abatement and demolition would be less than significant.

Mitigation Measure 4.7-1a would require that measures be included in the future development project design to incorporate SMAQMD's best management practices for reducing construction-related GHGs. These measures include use of efficient engines in off-road equipment, use of renewable fuels and electric equipment, limiting idling, and promotion of carpooling for construction workers. Mitigation Measure 4.7-1a requires that documentation demonstrating the sufficient application of these measures to reduce the project's construction GHGs below SMAQMD's 1,100 $MTCO_2e$ construction threshold be provided to SMAQMD. Implementation of Mitigation Measure 4.7-1a would reduce GHG emission impacts from construction of new development and would, therefore, be less than significant with mitigation.

Implementation of Mitigation Measure 4.7-1b would require the omittance of natural gas connections from project design. Mitigation Measure 4.7-1c would require that the project implement electric vehicle (EV) chargers of the type and quantity required to comply SMAQMD BMP 2. However, given the preliminary nature of the project design, it cannot be confirmed that Mitigation Measures 4.7-1b and 4.7-1c could be implemented fully. There may be specialized uses within the downtown campus facilities that require the use of natural gas. There may be limitations that are not known at this time that would limit the delivery of sufficient electricity to provide numerous EV chargers in a parking structure setting. Although these mitigation measures align with the intent and objectives of the California State University Sustainability Policy, full implementation of Mitigation Measured 4.7-1b and 4.7-1c cannot be assured given the limited project design information currently available. Therefore, this impact would be significant and unavoidable.

Although it cannot be assured that the future development scenario associated with the proposed project would be consistent with SMAQMD's Tier 1 BMPs, the project's operational emissions following the implementation of the Tier 1 BMPs were calculated and compared to SMAQMD's 1,100 $MTCO_2e$ screening level to disclose project GHG emissions if the TEIR 1 BMPs were able to be implemented. Anticipated annual project-generated operational GHG emissions are shown in Table 4.7-4 in Section 4.7, "Greenhouse Gas Emissions and Climate Change."

As shown in Table 4.7-4, the project would exceed the 1,100 $MTCO_2e$ threshold following the application of SMAQMD's Tier 1 BMPs. Therefore, according to the SMAQMD CEQA Guidelines, the project would be required to implement Tier 2 BMP 3, which consists of reducing the project's VMT by 15 percent compared to the county regional average to meet the standard for residential projects per LCI's standards pursuant to Senate Bill 743. As discussed in Section 4.4, "Transportation and Circulation," the project site is in an area that currently generates work VMT per employee that is 16 percent below the regional average and household VMT per capita that is 28 percent below the

regional average. As identified in the discussion of Impact 4.4-2, "Conflict or be Inconsistent with CEQA Guidelines Section 15064.3(b)," due to the project's proximity to major transit stops, the type and mix of proposed land uses, and the inclusion of residential and local-serving commercial retail uses, the project would maintain the low-VMT characteristics of the area. Since the project area has VMT levels more than 15 percent below the regional average, and these levels would be maintained with development of the proposed project, the project would meet the Tier 2 BMP 3 criteria.

In summary, as shown in Table 4.7-4, the project would exceed SMAQMD's operational GHG emissions screening level of 1,100 $MTCO_2e$. However, the project would also meet the VMT reduction target of 15 percent below the county regional average VMT to comply with Tier 2 BMP 3. Despite meeting this VMT target, it cannot be assured that Mitigation Measures 4.7-1b and 4.7-1c requiring the implementation of SMAQMD's Tier 1 BMPs can be fully implemented as part of future development. Therefore, the future development scenario would conflict with SMAQMD's VMT-related threshold. This impact would be **significant and unavoidable**.

6.2.4 Noise and Vibration

Impact 4.9-1: Short-Term Construction/Demolition-Related Noise Levels

Demolition and construction activities associated with the project would generate temporary noise levels during daytime and, in some circumstances, could require nighttime work. Daytime construction activities would be exempt from the City's daytime noise standards, as established in the City of Sacramento's Municipal Code (Section 8.68.080 Exemptions). Although daytime construction is exempt from the City noise standards, if demolition or construction is required during more sensitive times of day, noise from these activities would exceed the City's nighttime noise standards, established to protect residential uses from sleep disturbance, resulting in potentially adverse effects on nearby sensitive receptors. Therefore, this impact would be potentially significant.

Implementation of Mitigation Measure 4.9-1 would reduce potential community disruption by providing advance notice of nighttime construction activities and establishing a mechanism to address noise complaints; however, advance notice would not directly reduce noise generated by construction equipment or activities. Temporary noise barriers, sound curtains, and other construction noise control measures may reduce noise up to 10 dB (NCHRP 1999). However, effectiveness depends on various factors, including how well the barrier blocks the line-of-sight, whether or not there are gaps in the barrier, and if the receptors are in upper levels of buildings and in direct line of site of the activity. Nighttime noise during potential demolition activities would require a reduction of 9 dB to achieve thresholds at all receiving residential uses and for nighttime construction associated with future development, a 6 dB reduction would be required. Thus, it is conceivable that if barriers are used during all nighttime activities and implemented adequately, nighttime noise standards could be achieved at all nearby residential receptors. However, considering that nearby receptors are in residential multi-level towers, unless barriers are sufficiently close to construction activities/equipment, it is unlikely that the full level of reduction would not be achieved at all nearby residential receptors. As a result, occupants of upper-story buildings and other sensitive receptors could continue to experience construction noise levels that exceed applicable standards despite implementation of mitigation. Therefore, impacts would be **significant and unavoidable** for nighttime demolition and construction activities.

Impact 4.9-2: Short-Term Construction-Related Vibration Levels

Demolition and future construction activities associated with the project would generate groundborne vibration that could affect nearby sensitive receptors. Predicted vibration levels from typical demolition and construction activities would exceed Federal Transit Administration (FTA) recommended criteria at daytime-sensitive uses located within 58 feet of equipment use. In addition, vibration generated by heavy equipment operating within 48 feet of sensitive structures, could exceed Caltrans' recommended vibration threshold of 0.08 inches per second (in/sec) peak particle velocity (PPV) to protect historic structures. Therefore, the project's construction vibration impact would be potentially significant.

Implementation of Mitigation Measure 4.9-2a would require the demolition and construction contractors to employ feasible measures to reduce off-site vibration exposure and disturbance. In addition, vibration monitoring would provide a mechanism to adjust on-site measures, should vibration levels exceed applicable limits. However, while these measures could potentially reduce vibration exposure, not all measures may be deemed feasible by demolition or construction contractors. That is, because for certain demolition and construction activities, there are only limited methods available. And, due to the proximity of nearby receptors, even with reasonable on-site reduction measures, the possibility remains that vibration levels could generate disturbance levels at nearby building that exceed the identified thresholds.

Implementation of Mitigation Measure 4.9-2b would require preconstruction condition surveys, review by a licensed structural or geotechnical engineer, implementation of vibration monitoring, and adherence to applicable vibration limits to protect the Sutter Club and the adjacent Commercial Building. In addition, the measure provides for documentation of vibration monitoring results and repair of any project-related damage. Through implementation of these requirements, vibration-generating activities would be managed to avoid exceedance of applicable vibration criteria to minimize the potential for structural damage, and repair of damage if it does occur.

While impacts from structural damage would be reduced to a less-than-significant level with Miitgation Measure 4.9-2b, impacts from vibration annoyance could still occur at nearby uses and this impact would remain **significant and unavoidable** for both demolition and future construction.

6.2.5 Cultural Resources

Impact 4.13-1: Cause a Substantial Adverse Change in the Significance of a Historical Resource

Five historical resources are located within or immediately adjacent to the project site. Implementation of the project would result in the physical alteration of historical built resources that could result in a substantial adverse change in the significance of historical resources. This is a potentially significant impact.

Implementation of Mitigation Measure 4.13-1a would reduce impacts on the California State Government Building District, and implementation of Mitigation Measure 4.13-1b would reduce impacts on the Capitol Mall State Buildings Historic District. However, impacts to both resources would remain significant and unavoidable because demolition would result in the permanent loss of historical resources that cannot be replaced. The Capitol Mall State Buildings Historic District would no longer exist because of demolition of two of the three buildings that comprise it, and the California State Government Buildings District would be diminished.

Implementation of Mitigation Measure 4.13-1c through 4.13-1f would reduce potential impacts on the Sutter Club by installing and using protective barriers during demolition and construction activities to prevent falling debris or materials from damaging the historic resource; by monitoring and controlling vibration to prevent structural damage; and by repairing any inadvertent damage, including repairing any damage to character defining features according to Secretary of the Interior's Standards for the Treatment of Historic Properties. Implementation of these mitigation measures would reduce the project's impact on the historic Sutter Club to a less-than-significant level.

Because the project would result in the permanent loss of the Capitol Mall State Buildings Historic District and the potential loss of additional historical resources or substantial impairment of their integrity, these impacts would remain **significant and unavoidable**.

6.2.6 Tribal Cultural Resources

Impact 4.14-1: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource

The North Central Information Center records search identified one Tribal cultural resource in the project area (P-34-005225) as described under AB 52. Consultation with Wilton Rancheria, the United Auburn Indian Community, and the Shingle Springs Band of Miwok Indians did not identify any additional resources. Because project-related ground-disturbing activities could result in damage to previously unknown Tribal cultural resources resulting in a substantial adverse change in its significance, the project could cause a potentially significant impact.

For demolition activities, implementation of project-specific Mitigation Measures 4.14-1a through 4.14-1c would reduce impacts associated with Tribal cultural resources to a less-than-significant level by requiring implementation of a worker Tribal cultural resources awareness program, a Tribal monitor during ground disturbing activities, the performance of professionally accepted and legally compliant procedures in the event of a discovery, as well as the protection of any previously undocumented significant Tribal cultural resources.

For future redevelopment activities, Mitigation Measures 4.14-1a through 4.14-1c would substantially reduce the potential for adverse effects on Tribal cultural resources; however, because the specific design, grading plans, excavation depths, foundation systems, utility improvements, and other ground-disturbing construction methods associated with future redevelopment are not currently known, it is not possible to determine with certainty whether impacts to Tribal cultural resources can be fully avoided or reduced to a less-than-significant level. Therefore, impacts to Tribal cultural resources associated with future redevelopment would be **significant and unavoidable**.

6.3 SIGNIFICANT AND IRREVERSIBLE ENVIRONMENTAL CHANGES

The State CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by the project. Specifically, the State CEQA Guidelines section 15126.2(c) states:

> Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generation to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

The project would result in the irreversible and irretrievable commitment of energy and material resources during demolition and future development, including the following:

- construction materials, including such resources as soil, rocks, wood, concrete, glass, and steel;
- water supply for project construction and operation; and
- energy expended in the form of electricity, natural gas, diesel fuel, gasoline, and oil for equipment and transportation vehicles that would be needed for project construction and operation.

These nonrenewable resources would represent only a modest portion of the resources available in the region and would not affect the availability of these resources for other needs in the region.

There is no evidence to suggest that demolition activities and construction of future uses would result in inefficient use of energy or natural resources. During demolition of the existing Capitol Mall buildings, a material recycling program would be implemented. While the specific materials and volume of materials are not known at this time, the program would likely recycle a large volume of concrete rubble and rebar. During construction, contractors would use best available engineering techniques, construction and design practices, and equipment operating procedures.

Operation of future uses would be consistent with the CSU Sustainability Policy, which include policies related to energy conservation, carbon reduction, utility management, water conservation, sustainable procurement, waste management, sustainable food service, sustainable building and lands practices, and transportation. The CSU Sustainability Policy requires campuses to track and report progress using the Association for the Advancement of Sustainability in Higher Education's (AASHE) guidance. Operation of future uses would not result in substantial long-term consumption of energy and natural resources. Per CSU Sustainability Policy I.6, the future development shall be designed and built to meet or exceed minimum requirements equivalent to Leadership in Energy and Environmental Design (LEED) Silver. Public transit would be available for use in close proximity to the project site because the project is adjacent to several light rail and bus stops for several different routes.

7 ALTERNATIVES

7.1 INTRODUCTION

The California Code of Regulations (CCR) Section 15126.6(a) (State CEQA Guidelines) requires EIRs to describe "… a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather, it must consider a range of potentially feasible alternatives that will avoid or substantially lessen the significant adverse impacts of a project, and foster informed decision making and public participation. An EIR is not required to consider alternatives that are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason." This section of the State CEQA Guidelines also provides guidance regarding what the alternatives analysis should consider. Subsection (b) further states the purpose of the alternatives analysis is as follows:

> Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code [PRC] Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

The State CEQA Guidelines require that the EIR include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative must be discussed, but in less detail than the significant effects of the project as proposed (CCR Section 15126.6[d]).

The State CEQA Guidelines further require that the "no project" alternative be considered (CCR Section 15126.6[e]). The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving the proposed project. If the no project alternative is the environmentally superior alternative, CEQA requires that the EIR "…shall also identify an environmentally superior alternative among the other alternatives." (CCR Section 15126[e][2]).

In defining "feasibility" (e.g., "… feasibly attain most of the basic objectives of the project …"), CCR Section 15126.6(f) (1) states, in part:

> Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.

In determining what alternatives should be considered in the EIR, it is important to consider the objectives of the project, the project's significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted above, EIRs must contain a discussion of "potentially feasible" alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by the lead agency's decision-maker, here the DGS Director or her designee. (See PRC Sections 21081.5, 21081[a] [3].)

7.2 CONSIDERATIONS FOR SELECTION OF ALTERNATIVES

7.2.1 Attainment of Project Objectives

As described above, one factor that must be considered in selection of alternatives is the ability of a specific alternative to attain most of the basic objectives of the project (CCR Section 15126.6[a]). Chapter 3, "Project Description," articulates the following project objectives:

- support the State in removing underutilized property from its real estate portfolio;
- provide an opportunity for development of land uses on the subject parcels that integrate with the existing surroundings and take advantage of existing assets such as proximity to multiple transit modes (e.g., bus, light rail);
- support the opportunity to optimize the development potential on the project parcels while maintaining conformity with the Capitol View Protection Act;
- support the efficient use of State funds and resources; and
- allow for provision of facilities on the project parcels that meet current construction standards and codes.

7.2.2 Environmental Impacts of the Capitol Mall Office Buildings Demolition Project

Sections 4.2 through 4.17 of this Draft EIR address the environmental impacts of implementation of the proposed project. Potentially feasible alternatives were developed with consideration of avoiding or lessening the significant, and potentially significant, adverse impacts of the project, as identified in Chapter 4 of this Draft EIR and summarized below. If an environmental issue area analyzed in this Draft EIR is not addressed below, it is because no significant impacts were identified for that issue area. The project would result in the following significant and unavoidable environmental impacts:

- **Transportation and Circulation:** Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; and result in demolition/construction activity that could cause temporary impacts to transportation and traffic.
- **Air Quality**: Conflict with or obstruct implementation of an applicable air quality plan; and result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.
- **Greenhouse Gas Emissions and Climate Change**: Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment or conflict with or obstruct a GHG reduction plan.
- **Noise and Vibration:** Short-term construction/demolition-related noise levels; and short-term construction-related vibration levels.
- **Cultural Resources:** Cause a substantial adverse change in the significance of a historical resource.
- **Tribal Cultural Resources:** Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource.

7.3 ALTERNATIVES CONSIDERED BUT NOT EVALUATED FURTHER

As described above, State CEQA Guidelines Section 15126.6(c) provides that the range of potential alternatives for the project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. Alternatives that fail to meet the fundamental project purpose need not be addressed in detail in an EIR. (*In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings* (2008) 43 Cal.4th 1143, 1165-1167.)

In determining what alternatives should be considered in the EIR, it is important to acknowledge the objectives of the project, the project's significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although EIRs must contain a discussion of "potentially feasible" alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by lead agency decision-maker(s). (See PRC Section 21081(a)(3).) At the time of action on the project, the decision-maker(s) may consider evidence beyond that found in this EIR in addressing such determinations. The decision-maker(s), for example, may conclude that a particular alternative is infeasible (i.e., undesirable) from a policy standpoint, and may reject an alternative on that basis provided that the decision-maker(s) adopts a finding, supported by substantial evidence, to that effect, and provided that such a finding reflects a reasonable balancing of the relevant economic, environmental, social, and other considerations supported by substantial evidence. (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 417; *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 998.)

The EIR should also identify any alternatives that were considered by the lead agency but rejected during the planning or scoping process and briefly explain the reasons underlying the lead agency's determination.

The following alternatives were considered by DGS but rejected from further study and are not evaluated further in this Draft EIR.

7.3.1 Reuse of the Existing Buildings for Housing

Reuse of the existing buildings for housing was considered but is not evaluated further in this EIR. This alternative would involve the State retaining and substantially rehabilitating the existing buildings for conversion to below-market-rate (BMR) or low-income residential uses. Under this alternative, no demolition activities would occur, and the existing buildings would not be transferred to another entity for future redevelopment.

A study was prepared for DGS in 2021 to evaluate the potential scope of work, cost, and funding sources to convert the existing Employment Development Department (EDD) Headquarters at 800 Capitol Mall and the EDD "Solar Building" Annex at 751 N Street into affordable housing units (Perkins & Will 2021). Results of the study indicated key upgrades needed for each of the buildings related to structural, mechanical, electrical, plumbing, fire protection (including fire alarm) components. Notably, a full seismic evaluation and retrofit would be required to accommodate affordable housing at both the 800 Capitol Mall and Solar Building properties. In addition, the 800 Capitol Mall building and the Solar building are served with chilled water and steam from the existing DGS Central Utility Plant for heating and cooling, and conversion to residential use would require disconnecting the buildings from the DGS Central Utility Plant and installing dedicated heating and cooling systems within each building that could serve multiple individual housing units on each floor. New electrical, plumbing, and fire protection systems, including new fire sprinkler and alarm systems would also be required. At the time the report was prepared, the approximate combined cost associated with reuse of these two buildings for housing was estimated to exceed 210 million. The State Personnel Board Building at 801 Capitol Mall was built very close to the same time as the EDD Headquarters Building in the mid-1950s, and is also connected to the DGS Central Utility Plant for heating and cooling. This building would be expected to present the same challenges as the EDD Headquarters Building regarding conversion to housing.

Further, given the age of all three buildings, abatement activities associated with lead-based paint, asbestos-containing materials, and other hazardous materials and building conditions would be required to accommodate residential uses. These conditions, combined with the physical characteristics and condition of the buildings, would require substantial investment to make the buildings suitable for residential occupancy and to bring them into compliance with applicable building codes, life-safety, accessibility, and other residential requirements. Such an investment would not be consistent with the State's objectives for the property, including the efficient use of State funds and resources and the provision of facilities that would meet current construction standards and codes. Accordingly, this alternative was eliminated from further consideration.

7.3.2 Redevelopment for State Office Uses

Redevelopment of the project site for continued State office uses was considered but is not evaluated further in this EIR. This would involve demolishing the existing buildings and redeveloping the project site with new State-owned and State-occupied office facilities. Under this alternative, the State would retain ownership of the property and continue to use the site for State office purposes, rather than transferring the property to another entity for future redevelopment.

As described above, the existing buildings are aged, in poor condition, and have substantial structural and infrastructure deficiencies. The 2021 study prepared for DGS identified substantial improvements that would be required to the EDD Headquarters Building and the EDD Solar Annex Building, including upgrades to structural, mechanical, electrical, plumbing, and fire protection systems, as well as abatement associated with lead-based paint, asbestos-containing materials, and other hazardous materials and building conditions (Perkins & Will 2021). Similar improvements are anticipated to be required for the State Personnel Board building. Although this alternative would involve demolition and construction of new facilities rather than conversion to residential use (as described in the Alternative, above), demolition and redevelopment of the site would still require substantial financial investment by the State for demolition, site preparation, and construction of new office facilities.

Redevelopment of the project site for additional State office uses also would not address the State's objective of removing underutilized property from its real estate portfolio. State-owned office space is available in the downtown Sacramento area and elsewhere in the region. Additional office space is anticipated to become available as other State office facilities are vacated, State staff are consolidated into existing underutilized space, or other buildings more suitable for continued use are renovated. As a result, development of new State office space at the project site is not recognized as a current need, nor necessary to accommodate existing State workers.

Similar to the reasons described above, development of new office facilities would require substantial additional investment by the State while continuing the State's ownership and operation of office facilities in an area where additional office capacity is not currently needed. Therefore, redevelopment of the site for additional State office uses was eliminated from further consideration.

7.4 ALTERNATIVES SELECTED FOR DETAILED ANALYSIS

The following alternatives are evaluated in this Draft EIR.

- **Alternative 1: No Project–No Development** assumes no demolition of the existing structures nor construction of new buildings. The project site would remain in its current condition.
- **Alternative 2: Demolition with No Redevelopment** assumes that the existing structures would be demolished with no determined plans for future reuse or development.
- **Alternative 3: Transfer of Property for Office and/or Housing Development** assumes that demolition of existing structures would occur and that the property would be transferred to an entity that plans to develop the project site for office uses, market rate housing uses, or a combination thereof with ground-floor retail.

Further details on these alternatives, and an evaluation of environmental effects relative to the proposed project, are provided below.

7.4.1 Alternative 1: No Project–No Development

Under Alternative 1, the No Project–No Development Alternative, no action would be taken by DGS and the project site would remain unchanged from current conditions. The existing state-owned buildings would remain vacant and in their current condition, no land transfer would occur, and the state would continue to own and maintain the buildings. The buildings would be operated under a "warm shut-down," meaning that utility connections would remain in place and the structures would be mothballed (not used but kept intact). No tenants would be sought

for the buildings because of deficiencies associated with mechanical and utility issues and the presence of asbestos and lead-containing materials. The No Project–No Development Alternative would not meet the project objectives, nor is it a sustainable option. However, as required by CEQA, the No Project–No Development Alternative is evaluated in this Draft EIR.

Although it is acknowledged that with the No Project–No Development Alternative there would be little to no change in conditions at the project site, and thus no environment effects, for purposes of comparison with the other action alternatives, conclusions for each technical area are characterized as "impacts" that are greater, similar, or less, to describe conditions that are worse than, similar to, or better than those of the proposed project.

LAND USE AND PLANNING

The No Project–No Development Alternative would be consistent with the existing land uses identified in the State's Capitol Area Plan, Sacramento Region Blueprint, 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS), City of Sacramento 2040 General Plan, and Central City Community Plan. In comparison, the proposed project would also be consistent with these plans. Implementation of the project would not result in any conflicts with environmental plans, goals, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, impacts of the No Project–No Development Alternative would be **similar** to those of the proposed project with respect to land use.

POPULATION, EMPLOYMENT, AND HOUSING

The No Project–No Development Alternative would not generate a population increase or an increase in the demand for housing in the project area because the structures would remain vacant. In comparison, the proposed project would involve demolition of the site buildings and future redevelopment activities that include student and market-rate housing, which would increase residential uses and residents in the downtown Sacramento area. Neither the No Project–No Development Alternative nor the proposed project would result in significant population, employment, or housing impacts. However, because Alternative 1 would not include future residential or other development and therefore would not generate additional population or housing demand, this alternative would result in **less** impacts than the proposed project.

TRANSPORTATION AND CIRCULATION

Under the No Project–No Development Alternative no vehicular trips would be generated related to demolition or construction, there would be no change to existing vehicular trips, and the project's location would remain in a transit priority zone. In comparison, demolition- and construction-related traffic and transit-related disruption would be significant and unavoidable for the proposed project. The proposed project would result in less-than-significant vehicle miles traveled (VMT), traffic hazards, and emergency access impacts. Because the No Project–No Development Alternative would not involve any demolition, construction, or operational activities that would affect transportation and traffic, it would avoid significant transportation impacts associated with the proposed project. Therefore, Alternative 1 would result in transportation and circulation impacts that are **less** than the proposed project.

UTILITIES AND SERVICE SYSTEMS

The No Project–No Development Alternative would not result in additional demand for water, wastewater treatment, stormwater conveyance, electricity, or natural gas; nor would it result in the need for new infrastructure. By comparison, though future development of the project site would require increased utility demands compared to existing conditions, the project would result in less-than-significant impacts to utility demand and infrastructure. Therefore, the No Project–No Development Alternative would not avoid any significant impacts but would result in **less** of a utility and service systems impact than the proposed project.

AIR QUALITY

The No Project–No Development Alternative would involve no demolition activities and no future redevelopment construction or operational activities. As a result, this alternative would not generate demolition/construction- or operations-related air emissions. By comparison, the proposed project would result in less-than-significant construction emissions and odor impacts but would result in significant and unavoidable operational emissions. Implementation of the No Project–No Development Alternative would avoid demolition and construction disturbance and would not result in associated construction air quality impacts; therefore, this alternative would result in **less** of an impact than the proposed project.

GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

Because the No Project–No Development Alternative would involve no demolition or construction disturbances and no new greenhouse gas (GHG) emissions or energy usage from new development, this alternative would not generate new construction- or operations-related GHG emissions. By comparison, the project would result in less-than-significant GHG impacts during demolition and construction but would result in significant and unavoidable GHG impacts during operations. The No Project–No Development Alternative would not result in any new GHG-emissions beyond the ongoing energy used to maintain the buildings in a warm shut-down. Therefore, this Alternative would result in **less** GHG-related impacts than the proposed project.

ENERGY

Under the No Project–No Development Alternative no demolition or construction activities would occur and the buildings would be places in a "warm shut-down;" which is very similar to their current condition. Therefore, there would be little to no change in energy use. Demolition and construction activities associated with the proposed project would not result in wasteful, inefficient, and unnecessary consumption of energy, and operation of the future development would support building energy efficiency through the inclusion of new energy-efficient uses and structures. In comparison to the proposed project, the No Project-No Development Alternative would avoid all energy use related to demolition and construction, however, this alternative would not realize modern energy efficiency within active buildings from site improvements (i.e., redevelopment). Overall, this alternative would result in **less** energy use; however, energy usage would be associated with the ongoing warm shut-down of vacant buildings rather than for actively used buildings under the proposed project.

NOISE AND VIBRATION

Under the No Project–No Development Alternative no demolition or construction activities would occur and no additional noise would be generated by facility operations. Therefore, there would be no increase in potential noise conflicts under the No Project-No Development Alternative. By comparison, the proposed project would result in significant demolition and construction noise impacts, while impacts related to vibration and operational noise would be less-than-significant with mitigation. Project construction noise related to transportation would be less than significant. Because the No Project–No Development Alternative would result in no noise from construction nor operational activities, this alternative would result in **less** noise than the proposed project.

GEOLOGY AND SOILS

The No Project–No Development Alternative would retain the project site in its current state. There would be no potential for increased erosion or increased risk from seismic or soils hazards resulting from demolition or future redevelopment activities. Although the proposed project would demolish the existing buildings and result in future redevelopment of the site, it would not generate the potential for substantial soil erosion and would result in less-than-significant impacts related to seismic hazards, liquefaction, and expansive soils. Because of developed site conditions and required building standards, neither the proposed project nor the No Project–No Development

Alternative would result in significant impacts related to geology and soils. However, because Alternative 1 would preclude demolition and future development activities at the project site, impacts related to geology and soils under this alternative would be **less** than the proposed project.

HYDROLOGY AND WATER QUALITY

Under the No Project–No Development Alternative, there would be no potential for construction-related releases of sediment and contaminants into surface waters or groundwater, and no changes in water demand, stormwater generation, drainage patterns, or flood risk. In comparison, the project site is already developed, and implementation of the project would result in less-than-significant impacts related to hydrology and water quality. Various stormwater pollution prevention devices and best management practices (BMPs) would be implemented, and the project would be required to comply with existing State and local regulations regarding the City's combined storm sewer (CSS) and National Pollutant Discharge Elimination System (NPDES) permits. Implementation of BMPs and compliance with State and local requirements would result in similar runoff and water quality during storm events as under existing conditions. Neither the project nor the No Project-No Development Alternative would result in any significant impacts related to hydrology and water quality; however, because Alternative 1 would not include redevelopment of the site, this alternative would result in impacts that are **less** than the proposed project with regard to hydrology and water quality.

HAZARDS AND HAZARDOUS MATERIALS

The project site buildings contain materials such as asbestos and lead-based paint that would be left in place under the No Project-No Development Alternative. In contrast, demolition activities associated with the project could result in the exposure of construction workers and the public to hazardous material identified in the existing structures. Contractors and the State are required to comply with federal, State, and local regulations intended to protect workers and the public from exposure to hazardous or contaminated materials and to ensure the appropriate abatement and disposal of these materials. Compliance with these regulations would prevent the project from resulting in a significant risk to construction workers or the public. Future development and operation of the project would also involve the storage, use, and transport of hazardous materials; however, such use would be done in compliance with federal, State, and local regulations. Although the proposed project would not result in any significant impacts related to hazardous materials and public health, the No Project-No Development Alternative would result in no disturbance of existing hazardous materials nor change in use of hazardous materials. Therefore, the No Project-No Development Alternative would result in **less** of an impact than the proposed project with regard to hazards and hazardous materials. However, the No Project–No Development Alternative would also foreclose the opportunity to appropriately remediate and dispose of hazardous materials in the existing structures.

CULTURAL RESOURCES

The No Project–No Development Alternative would not involve any demolition or construction activities, thereby avoiding impacts related to the disturbance, destruction, or alteration of any known or as-yet-undiscovered and unrecorded pre-historic or historic archeological resources, human remains, or historic architectural resources. In comparison, demolition activities associated with the proposed project would result in less-than-significant impacts associated with ground disturbance because no major excavation would occur; the buildings would be demolished to the existing foundations, and only minor utility access would occur in previously trenched/disturbed soils. Redevelopment by Sacramento State (or other entity) would result in major ground disturbance that could adversely affect undiscovered/unrecorded subsurface archaeological resources. These impacts would be reduced to less-than-significant levels through implementation of mitigation measures. The proposed project would also result in significant and unavoidable impacts to historic resources through the removal of the EDD Headquarters and the State Personnel Board Building, which are both contributors to the California State Government Building District. Because the No Project–No Development Alternative would not include any ground disturbance, it has a lesser potential to result in the disturbance of as-yet undiscovered subsurface archaeological resources and/or human remains. Further, the No Project-No Development Alternative would avoid disturbance to the EDD Headquarters and State Personne

Board Buildings. Therefore, the cultural resource impacts under the No Project–No Development Alternative would be **less** than the proposed project.

TRIBAL CULTURAL RESOURCES

Under the No Project–No Development Alternative, no demolition or future redevelopment of the site would occur; and there would be no ground-disturbing activities that could result in damage to previously unknown Tribal cultural resources. Under the proposed project, impacts related to tribal cultural resources during demolition activities would be less-than-significant through implementation of mitigation measures; however, impacts during future development activities would be significant and unavoidable. Because no earthmoving activities would occur under the No Project–No Development Alternative, and therefore no potential to encounter or disturb existing resources exists, this alternative would result in **less** impacts related to Tribal cultural resources than the proposed project.

BIOLOGICAL RESOURCES

The No Project–No Development Alternative would not include any demolition or construction activities and would thus not disturb any existing on-site biological resources. However, the project site is currently developed with urban uses and generally lacks sensitive species or their habitat. Although the project site is a developed urban location the proposed project could result in potential disturbance of nesting raptors, bat roosts, and City trees. These effects would be mitigated to avoid and minimize disturbance to these resources, resulting in less-than-significant impacts. Because the No Project–No Development Alternative would avoid disturbance to the building and project site, it would avoid these potential impacts and would result in **less** potential biological resource impacts than the proposed project.

PUBLIC SERVICES AND RECREATION

The No Project–No Development Alternative would not generate increased demands for fire protection, law enforcement, or parks and recreation or school facilities. In comparison, the proposed project would generate long-term increased demands for fire, police, parks and recreation, or school facilities, but not to the extent that the provision of new or physically altered facilities would be required. Because the project would result in less-than-significant impacts on public services and recreation, the No Project–No Development Alternative would not reduce or avoid any significant impacts related to this environmental issue area. However, because the No Project-No Development Alternative would not include any future population increases that could increase service demands in the project area, this alternative would result in **less** impacts to the proposed project with regard to public services and recreation.

AESTHETICS, LIGHT, AND GLARE

Under the No Project–No Development Alternative, no demolition or future new development would occur. There would be no alteration of the visual character of the project site; views of the area from surrounding vantage points would not change; and no new sources of light, glare, or shadow would be created. In comparison, the proposed project would result in demolition of the existing state office buildings and potential future development by Sacramento State (or other entity). The proposed project would temporarily alter views within the project area during demolition and construction. However, because the project is located in an urban, developed area of downtown Sacramento, the local visual character after demolition and future redevelopment, as experienced by viewer groups in the area, would not be substantially altered. Because the project would not result in any significant impacts related to aesthetics, light, and glare, the No Project-No Development Alternative would not avoid any significant impacts. However, the No Project–No Development Alternative would make no changes to the visual character of the site and would avoid both short-term and long-term impacts on a scenic vista (i.e., the Capitol Mall view corridor); therefore, the No Project-No Development Alternative would result in **less** of an impact than the proposed project with regard to visual impacts.

7.4.2 Alternative 2: Demolition with No Redevelopment

The Demolition with No Redevelopment Alternative (Alternative 2) would include demolition of the project site buildings to the existing building foundations; however, it would not include redevelopment of the project site following demolition. Under Alternative 2, no land transfer would occur, and the State would continue to own the property following demolition. The site would remain vacant and would not be developed with a permanent land use or new structures. Following demolition, the State would maintain the property in a vacant condition. Although no permanent redevelopment would occur under this alternative, the vacant site could potentially be used for temporary or interim uses that would not require permanent development of the property. Such uses could include temporary parking, farmers markets, community events, staging areas, or other compatible temporary activities.

Under Alternative 2, the State could continue to consider some future land transfer or redevelopment of the property. If the property were subsequently transferred, a future property owner could elect to develop the site with residential, office, or other uses consistent with applicable land use regulations. However, because no future redevelopment is proposed as part of Alternative 2, the timing, type, intensity, and design of any future development would remain uncertain and would be subject to separate planning, environmental review, permitting, and approval processes, as applicable.

Alternative 2 would achieve some of the Project's objectives by removing the existing buildings, which do not currently meet applicable life-safety, accessibility, and other current building standards and codes. Demolition would also eliminate the ongoing costs and responsibilities associated with maintaining the underutilized buildings. In addition, because the State would not undertake redevelopment of the property under this alternative, it would avoid the substantial costs associated with constructing new facilities or otherwise improving the site for a specific future use. However, Alternative 2 would also not meet several of the project objectives. In particular, the State would continue to own the vacant property and, therefore, the property would remain within the State's real estate portfolio rather than being transferred to another entity for future redevelopment. The alternative also would not provide a defined opportunity for development of compatible land uses in the downtown area near existing transit modes or support optimization of the development potential of the project site because the site would remain vacant following demolition, precluding future redevelopment opportunities that could otherwise occur on the site. Although temporary uses could provide some interim public or community benefit, such uses would not provide the long-term development opportunities contemplated by the proposed project.

LAND USE AND PLANNING

Like the proposed project, Alternative 2 would not result in any conflict with existing land use plans, policies, or regulations identified in the State's Capitol Area Plan, Sacramento Region Blueprint, 2020 MTP/SCS, City of Sacramento 2040 General Plan, and Central City Community Plan. Neither the proposed project nor Alternative 2 would result in land use inconsistencies or result in conflicts with environmental plans, goals, or regulations adopted for the purpose of avoiding or mitigating environmental effects. Although land uses after building demolition under Alternative 2 would be dramatically different than the proposed project, land use impacts in the context of CEQA Guidelines criteria would be **similar** between the two.

POPULATION, EMPLOYMENT, AND HOUSING

Alternative 2 would not increase local population or the demand for housing in the project area because the structures would be demolished and no future uses would be developed. In comparison, the proposed project would involve demolition of the site buildings and future redevelopment activities that would introduce new residential and commercial uses, resulting in increases in population and employment at the project site. Neither Alternative 2 nor the proposed project would result in significant population, employment, or housing impacts. However, because Alternative 2 would involve demolition without subsequent redevelopment, it would not result in the population, employment, or housing growth associated with the proposed project. As a result, this alternative would result in **less** impact than the proposed project.

TRANSPORTATION AND CIRCULATION

Under Alternative 2, demolition activities would generate temporary construction-related vehicle trips, but no future redevelopment or associated vehicular trips would occur. The project site is in a transit priority zone, and like the proposed project, Alternative 2 would result in less-than-significant impacts related to VMT, traffic hazards, and emergency access. Also like the project, however, demolition activities under Alternative 2 could result in transit-related disruption and traffic impacts. Because Alternative 2 would involve demolition only and would not include future redevelopment, the duration and extent of construction-related traffic effects would be reduced compared to the proposed project. Therefore, Alternative 2 would result in **less** transportation and circulation impacts than the proposed project.

UTILITIES AND SERVICE SYSTEMS

Alternative 2 would not include future redevelopment and, therefore, would not generate additional demand for water supply, wastewater treatment, solid waste disposal, or other utility and service systems associated with new development. In comparison, the proposed project would involve future redevelopment that could increase demand for utility and service systems. Though both Alternative 2 and the proposed project would result in less-than-significant impacts to utilities and service systems, Alternative 2 would avoid the additional utility demand associated with future redevelopment. Therefore, Alternative 2 would result in **less** impact than the proposed project.

AIR QUALITY

Alternative 2 would involve demolition activities and associated temporary construction emissions but would not include future redevelopment or associated operational emissions or vehicular trips. In comparison, the proposed project would result in less-than-significant demolition and construction emissions and odor impacts but significant and unavoidable operational emissions. Because Alternative 2 would avoid emissions associated with future development and operation of the site, it would result in **less** of an impact than the proposed project with regard to air quality.

GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

Alternative 2 would involve demolition activities and associated temporary GHG emissions but would not include future redevelopment or associated construction or operational related GHG emissions. In comparison, the proposed project would result in less-than-significant GHG impacts during demolition and construction but would result in significant and unavoidable GHG impacts during operations. Because Alternative 2 would avoid GHG emissions associated with future development and operation of the site, it would result in **less** GHG-related impacts than the proposed project.

ENERGY

Alternative 2 would include demolition activities but no future redevelopment or associated operational energy use. Therefore, Alternative 2 would result in less temporary energy use than the proposed project because it would avoid energy use associated with construction of future uses. However, Alternative 2 would not realize potential long-term energy efficiency benefits associated with redevelopment and energy-efficient building improvements. Overall, Alternative 2 would result in **less** energy use than the proposed project.

NOISE AND VIBRATION

Alternative 2 would include demolition of the existing buildings but no future redevelopment. Demolition activities would result in the same temporary noise and vibration impacts as the proposed project. However, Alternative 2 would not include the additional construction activities associated with future redevelopment or operational noise from new uses. Because Alternative 2 would involve a shorter duration of construction noise (i.e., demolition only)

and no future operational noise, it would reduce the potential for noise and vibration impacts compared to the proposed project. Therefore, Alternative 2 would result in **less** noise and vibration impacts than the proposed project.

GEOLOGY AND SOILS

Alternative 2 would include demolition of the site buildings and no future redevelopment. Although the proposed project would demolish the existing buildings and result in future redevelopment of the site, it would not generate the potential for substantial soil erosion and would result in less-than-significant impacts related to seismic hazards, liquefaction, and expansive soils. Because of existing developed site conditions and required building standards, neither the proposed project nor Alternative 2 would result in significant impacts related to geology and soils. However, because Alternative 2 would involve demolition but no future redevelopment, it would require less ground disturbance and excavation than the proposed project. Therefore, Alternative 2 would result in impacts that are **less** than the proposed project with regard to geology and soils.

HYDROLOGY AND WATER QUALITY

Alternative 2 would require less excavation because no future redevelopment activities would occur. Thus, Alternative 2 would reduce the potential for construction-related releases of sediment and contaminants onto surfaces or to groundwater compared to the proposed project. Demolition activities under Alternative 2 would not result in changes to impervious surfaces because building foundations would remain in place. Like the proposed project, stormwater pollution prevention features and BMPs would be implemented during demolition, and Alternative 2 would be required to comply with State and local regulations regarding the City's CSS and NPDES permits. Implementation of BMPs and compliance with State and local requirements would result in similar runoff and water quality effects during storm events.

Although both the proposed project and Alternative 2 would result in less-than-significant hydrology and water quality impacts, Alternative 2 would result in lesser impacts because no future redevelopment activities would occur. Therefore, Alternative 2 would result in **less** impact than the proposed project with regard to hydrology and water quality.

HAZARDS AND HAZARDOUS MATERIALS

The project site buildings contain hazardous materials such as asbestos and lead-based paint that would require abatement prior to demolition. Like the proposed project, abatement and demolition activities under Alternative 2 could result in exposure of construction workers and the public to hazardous materials identified in the existing structures. Contractors of the State would be required to comply with federal, State, and local regulations intended to protect workers and the public from exposure to hazardous or contaminated materials and to ensure appropriate abatement and disposal of these materials. Compliance with these regulations would prevent abatement and demolition under Alternative 2 and the proposed project from resulting in a significant risk to construction workers and the public.

Because Alternative 2 would not involve future development, no hazardous materials would be used after demolition. Although the proposed project would not result in significant impacts related to hazardous materials and public health during future development construction and operation, Alternative 2 would not include future development activities and, therefore, would not result in future construction or operational hazards associated with the storage, use, or transport of hazardous materials. Therefore, Alternative 2 would result in **less** of an impact than the proposed project with regard to hazards and hazardous materials.

CULTURAL RESOURCES

Alternative 2 would include demolition of the existing buildings but would not include future redevelopment. Like the proposed project, demolition would result in impacts related to historic architectural resources and could result in impacts related to archaeological resources or human remains, although the limited ground disturbance associated

with demolition would reduce the potential for impacts to subsurface resources. Alternative 2 would avoid the additional ground disturbance associated with future redevelopment and would therefore reduce the potential for impacts to undiscovered subsurface archaeological resources and human remains. However, demolition under Alternative 2 would still result in permanent impacts associated with removal of existing buildings that contribute to an historic district. Therefore, Alternative 2 would result in **similar** cultural resource impacts as the proposed project.

TRIBAL CULTURAL RESOURCES

Demolition activities under Alternative 2, like the proposed project, would involve limited ground disturbance and, thus, would have limited potential to encounter or disturb previously unknown Tribal cultural resources. In comparison, the proposed project would include substantial ground disturbance associated with future redevelopment, which could result in impacts to previously unknown Tribal cultural resources. Impacts to Tribal cultural resources associated with demolition activities under the proposed project would be reduced to a less-than-significant through implementation of mitigation measures. However, although mitigation measures would reduce potential impacts associated with future redevelopment, uncertainty regarding the methods of protection and avoidance that may be feasible once redevelopment occurs precludes a determination that impacts could be reduced to a less-than-significant level. Therefore, impacts to Tribal cultural resources associated with future redevelopment under the proposed project would remain significant and unavoidable, whereas Alternative 2 would avoid the potential impacts associated with future redevelopment. Therefore, Alternative 2 would result in **less** impact related to Tribal cultural resources than the proposed project.

BIOLOGICAL RESOURCES

Alternative 2would include demolition activities to remove existing site structures. The project site is currently developed with urban uses and lacks sensitive species or their habitat. Although the project site is a developed urban location, the proposed project could result in potential disturbance of nesting raptors, bat roosts, or City trees, which would be mitigated to avoid disturbance to these resources, resulting in less-than-significant impacts. Because Alternative 2 would also include removal of existing buildings, it could similarly result in disturbance to nesting raptors, bat roosts, and City trees. However, disturbance would not occur again during construction and operation of future development. Therefore, Alternative 2 would result in **less** impacts to biological resources as the proposed project.

PUBLIC SERVICES AND RECREATION

Alternative 2 would not result in new development or an increase in population that would generate additional demand for public services or recreational resources. In comparison, the proposed project would involve future redevelopment that would increase demand for public services and recreational resources associated with new residential and other uses. Both Alternative 2 and the proposed project would result in less-than-significant impacts. However, because Alternative 2 would involve demolition but no future redevelopment, no future increases in population that would generate additional public service and recreation demands at the project site would occur. Therefore, Alternative 2 would result in **less** impact than the proposed project.

AESTHETICS, LIGHT, AND GLARE

Under Alternative 2, the existing site buildings would be demolished; however, no future new development would occur. Like the proposed project, there would be an alteration of the visual character of the project site through temporary demolition activities. Views of the area from surrounding vantage points would change, both temporarily during demolition and permanently as a result of removal of the buildings. No new permanent sources of light, glare, or shadow would be created. In comparison, the proposed project would result in demolition of the existing State office buildings and transfer of the property for future redevelopment. The proposed project would temporarily alter views within the project area during demolition and construction activities, with permanent visual changes resulting from future development. However, because the project is located in an urban, developed area of downtown

Sacramento, the local visual character after demolition and future development, as experienced by viewer groups in the area, would not be substantially altered.

Because the proposed project would not result in any significant impacts related to aesthetics, light, and glare, Alternative 2 would not avoid any significant impacts. Nevertheless, aesthetics impacts under Alternative 2 would be considered **less** than the proposed project because construction activities would be limited to demolition and would not include future development, resulting in a shorter duration of visual alteration in the downtown area.

7.4.3 Alternative 3: Transfer of Property for Office and/or Housing Development

The Transfer of Property for Office and/or Housing Development Alternative (Alternative 3) would include demolition of the existing buildings and transfer of the property to an entity that would redevelop the site with office uses, housing uses, or a combination thereof. Like the proposed project, Alternative 3 would remove the existing underutilized State office buildings and facilitate future redevelopment of the project site, but Alternative 3 assumes such uses to be office space and/or housing.

Like the proposed project, Alternative 3 would require demolition of the buildings and associated abatement of hazardous materials. Following demolition and transfer of the property by the State, the new property owner would be responsible for future development of the site. The type, size, intensity, and configuration of future development would depend on the owners' development plans and would be subject to applicable land use requirements, building standards, and environmental review and permitting requirements. Unless the new owner was another State agency, it is likely that the City of Sacramento would assume the role of CEQA lead agency for the future development.

Alternative 3 would meet the project objectives by removing underutilized property from the State's real estate portfolio and providing an opportunity for future development of compatible office and/or housing uses in downtown Sacramento that could take advantage of the site's proximity to transit and other surrounding assets. Development of the site would also provide an opportunity to optimize the development potential of the parcels while maintaining conformity with the Capitol View Protection Act. Transfer of the property would support the efficient use of State funds and resources by allowing the State to avoid the costs associated with retaining, rehabilitating, or redeveloping the existing State-owned facilities. Future development would be required to comply with current construction standards and applicable building and safety codes, thereby meeting the objective of providing facilities that meet current standards and codes.

Accordingly, Alternative 3 would meet all of the project objectives. Because Alternative 3 would involve demolition and transfer of the property for future redevelopment, it would be similar to the proposed project with regard to the State's underlying objectives but would allow the future property owner, and presumably the City of Sacramento, to determine whether office uses, housing uses, or a combination of these and/or uses would be most appropriate for the site.

LAND USE AND PLANNING

Like the proposed project, future development under Alternative 3 would be required to comply with applicable land use plans, including the Sacramento Region Blueprint, 2020 MTP/SCS, City of Sacramento 2040 General Plan, and Central City Community Plan, as well as the Capitol View Protection Act. Neither Alternative 3 nor the project would result in conflicts with applicable plans, policies, or regulations adopted for the purpose of avoiding or mitigating environmental effects. Therefore, Alternative 3 would result in **similar** impacts to the project with regard to land use and planning.

POPULATION, EMPLOYMENT, AND HOUSING

Depending on the type and intensity of future development under Alternative 3, including the amount of residential development, Alternative 3 could result in greater or lesser increases in local population, employment, and housing than the proposed project. Neither Alternative 3 nor the proposed project would result in substantial unplanned population growth or displace existing housing or people. Both alternatives would result in less-than-significant impacts related to population, employment, and housing. Therefore, Alternative 3 would result in generally **similar** impacts to the project with regard to population, employment, and housing.

TRANSPORTATION AND CIRCULATION

Like the proposed project, Alternative 3 would result in construction-related traffic and potential transit disruption, as well as vehicular trips associated with future development. Depending on the type and intensity of future development, Alternative 3 could generate somewhat greater or lesser VMT and traffic compared to the proposed project. Because the project site is in a transit priority zone, both Alternative 3 and the project would be expected to result in less-than-significant impacts related to VMT, traffic hazards, and emergency access. Therefore, Alternative 3 would result in generally **similar** transportation and circulation impacts than the proposed project.

UTILITIES AND SERVICE SYSTEMS

Depending on the type and intensity of future development, Alternative 3 could result in a somewhat greater or lesser demand for water, wastewater treatment, solid waste disposal, and other utility and service systems compared to the project. While different uses generate variable demand for utility services, buildout of the site with office and/or residential uses would be expected to result in a generally similar demand. However, both Alternative 3 and the proposed project would result in less-than-significant impacts to utilities and service systems because adequate capacity and applicable regulatory requirements would address anticipated utility and service system demand and generation. Therefore, Alternative 3 would result in **similar** impacts to the project with regard to utilities and service systems.

AIR QUALITY

Air quality impacts of demolition would be the same for Alternative 3 as for the proposed project. Construction and operation of office and/or housing uses would generate additional emissions from construction activity, vehicle trips, and energy use. Depending on the type and intensity of future development, operational emissions could be similar to or possibly somewhat greater than those associated with the proposed project. Therefore, overall, Alternative 3 would result in **similar** air quality impacts than the proposed project.

GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

Alternative 3 would include demolition and future redevelopment of the site, similar to the project. As a result, both alternatives would generate temporary demolition- and construction-related GHG emissions and operational GHG emissions associated with future development. The amount of GHG emissions under Alternative 3 would depend on the type and intensity of future office and/or housing development. Applicable GHG reduction and energy efficiency measures would be implemented under either alternative. Because Alternative 3 would involve a similar level of demolition and future development, it would result in generally **similar** GHG emissions and impacts as the project.

ENERGY

Similar to the proposed project, Alternative 3 would result in temporary energy use associated with demolition and construction and long-term energy use associated with operation of new development. Future development would be required to comply with applicable energy efficiency standards, which would reduce energy consumption and

avoid wasteful, inefficient, or unnecessary use of energy. Because both alternatives would include demolition and future development, Alternative 3 would result in **similar** energy impacts as the project.

NOISE AND VIBRATION

Like the proposed project, construction activities under Alternative 3 would result in temporary noise and vibration impacts, and future development would generate operational noise. Depending on the type and intensity of future development, construction noise levels could be similar to or slightly greater or less than those associated with the proposed project. Given the land uses associated with buildout of the proposed project (i.e., conference and event center), it is possible Alternative 3 could result in less operational noise. Overall, Alternative 3 would result in generally **similar** noise and vibration impacts compared to the proposed project.

GEOLOGY AND SOILS

Similar to the proposed project, construction activities under Alternative 3 could result in soil disturbance and erosion, and future development would be subject to applicable building standards related to seismic hazards, liquefaction, and expansive soils. Because both Alternative 3 and the proposed project would include demolition and future redevelopment and would be required to comply with applicable building standards, neither would result in significant impacts related to geology and soils. Therefore, Alternative 3 would result in **similar** impacts to the project with regard to geology and soils.

HYDROLOGY AND WATER QUALITY

Similar to the project, demolition and construction activities under Alternative 3 would result in soil disturbance and could result in releases of sediment or contaminants to surface waters or groundwater. Future redevelopment could also alter impervious surfaces and result in changes to site drainage and stormwater runoff. Applicable stormwater BMPs would be implemented under either alternative, and compliance with State and local codes and regulations would be required. Because Alternative 3 would include demolition and future redevelopment activities similar to the project, it would result in **similar** impacts to hydrology and water quality.

HAZARDS AND HAZARDOUS MATERIALS

Similar to the proposed project, demolition and construction activities under Alternative 3 could result in exposure of construction workers and the public to hazardous materials, including asbestos-containing materials and lead-based paint, and would require compliance with applicable federal, State, and local regulations governing the handling, abatement, and disposal of hazardous materials. Future office and/or housing uses could also involve the use, storage, or transport of hazardous materials, but would also be subject to applicable laws addressing these activities. Because Alternative 3 would involve similar demolition and future redevelopment activities, Alternative 3 would result in **similar** impacts to the project with regard to hazards and hazardous materials.

CULTURAL RESOURCES

Similar to the proposed project, demolition under Alternative 3 would result in impacts associated with the removal of existing historic resources (i.e., buildings contributing to an historic district), while future redevelopment could result in ground disturbance and potential impacts to undiscovered archaeological resources or human remains. Because Alternative 3 would include similar demolition and future redevelopment activities, it would have a similar potential to affect historic and subsurface archaeological resources. Therefore, Alternative 3 would result in **similar** cultural resource impacts as the proposed project.

TRIBAL CULTURAL RESOURCES

Similar to the proposed project, demolition and future redevelopment as part of Alternative 3 could involve ground-disturbing activities that could result in impacts to previously unknown Tribal cultural resources. Implementation of applicable mitigation measures would reduce potential impacts associated with demolition activities to less-than-significant levels and would reduce potential impacts associated with future redevelopment. However, because the specific methods of avoidance and protection that may be feasible during future redevelopment are not currently known, impacts associated with redevelopment would remain significant and unavoidable. Because Alternative 3 would include the same demolition activities and similar redevelopment construction activities, it would result in **similar** impacts related to Tribal cultural resources as the proposed project.

BIOLOGICAL RESOURCES

Similar to the proposed project, under Alternative 3 demolition and future construction activities could result in potential disturbance of nesting raptors, bat roosts, and City trees. Compliance with applicable regulations and implementation of required measures would avoid significant impacts to these resources. Because both Alternative 3 and the project would include demolition and future redevelopment, Alternative 3 would result in **similar** impacts to biological resources as the project.

PUBLIC SERVICES AND RECREATION

Alternative 3 would include demolition of the existing buildings and future redevelopment of the site with office uses, housing uses, or a combination thereof. Depending on the type and intensity of future development, Alternative 3 could result in greater or lesser demand for public services and recreation compared to the project. Notwithstanding, development of any type on the sites would result in some demand for fire protection, law enforcement, and potentially, schools, and recreational resources. However, neither Alternative 3 nor the project would result in substantial adverse physical impacts associated with the provision of public services and recreation, and both would result in less-than-significant impacts. Therefore, Alternative 3 would result in **similar** impacts than the project with regard to public services and recreation.

AESTHETICS, LIGHT, AND GLARE

Alternative 3 would include demolition of the existing site buildings and future redevelopment of the site with office uses, housing uses, or a combination thereof. Like the proposed project, demolition activities would temporarily alter views and the visual character of the site, and future development could result in additional permanent changes to views and visual character. Because the site is located in an urban, developed area of downtown Sacramento, development under either Alternative 3 or the proposed project would not substantially alter the established visual character of the area. Both alternatives would also be subject to requirements of the Capitol View Protection Act and applicable requirements related to light and glare. Therefore, Alternative 3 would result in **similar** impacts to the project with regard to aesthetics.

7.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Because the No Project–No Development Alternative (described above in Section 7.4.1) would avoid all adverse impacts resulting from building demolition and future redevelopment of the project site, it is the environmentally superior alternative. However, the No Project–No Development Alternative would not meet the project objectives, and because of the value of the downtown location, it is unlikely that the vacant buildings would stand in perpetuity.

When the environmentally superior alternative is the No Project Alternative, the State CEQA Guidelines (Section 15126[d][2]) require selection of an environmentally superior alternative from among the other action alternatives evaluated. As indicated in Table 7-1, the Demolition with No Redevelopment Alternative would be the environmentally superior action alternative because, although it would not avoid all significant or significant and unavoidable impacts

identified for the proposed project (e.g., historic resources impacts associated with demolition), it would result in fewer or reduced environmental impacts than both the proposed project and Alternative 3 in several resource areas. Unlike the proposed project and Alternative 3, Alternative 2 would not include future redevelopment of the site and, therefore, would avoid many of the future construction and operational impacts associated with redevelopment. As a result, Alternative 2 would generally result in reduced impacts related to population, employment, and housing; transportation and circulation; utilities and service systems; air quality; GHG emissions; energy; noise and vibration; geology and soils; hydrology and water quality; hazards and hazardous materials; biological resources; public services and recreation; and aesthetics. Although Alternative 2 would still result in impacts associated with demolition of the existing buildings, including impacts to historic resources, its overall environmental effects would be less than those of the other action alternatives. Like the No Project–No Development Alternative, it is unlikely that the parcels would remain vacant indefinitely, but interim uses such as those identified (e.g., parking, farmers markets, community events, staging areas) would create some value until more permanent uses are proposed.

Table 7-1 Summary of Environmental Effects of the Alternatives Relative to the Proposed Project

Environmental Topic	Proposed Project	Alternative 1: No Project – No Development	Alternative 2: Demolition with No Redevelopment	Alternative 3: Transfer of Property for Office and/or Housing Development
Land Use and Planning	Less than significant	Similar	Similar	Similar
Population, Employment, and Housing	Less than significant	Less	Less	Similar
Transportation and Circulation	Significant and unavoidable	Less	Less	Similar
Utilities and Service Systems	Less than significant	Less	Less	Similar
Air Quality	Significant and unavoidable	Less	Less	Similar
Greenhouse Gas Emissions and Climate Change	Significant and unavoidable	Less	Less	Similar
Energy	Less than significant	Less	Less	Similar
Noise and Vibration	Significant and unavoidable	Less	Less	Similar
Geology and Soils	Less than significant	Less	Less	Similar
Hydrology and Water Quality	Less than significant	Less	Less	Similar
Hazards and Hazardous Materials	Less than significant	Less	Less	Similar
Cultural Resources	Significant and unavoidable	Less	Similar	Similar
Tribal Cultural Resources	Significant and unavoidable	Less	Less	Similar
Biological Resources	Less than significant	Less	Less	Similar
Public Services and Recreation	Less than significant	Less	Less	Similar
Aesthetics, Light, and Glare	Less than significant	Less	Less	Similar

Source: Compiled by Ascent in 2026.

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8 REFERENCES

Chapter 1 Introduction

No references are cited in this chapter.

Chapter 2 Executive Summary

No references are cited in this chapter.

Chapter 3 Project Description

California Department of General Services. 2021 (March). *Capitol Mall Housing Study (722-800 Capitol Mall/751 N Street)*.

DGS. *See* California Department of General Services.

Chapter 4 Environmental Impacts and Mitigation Measures

No references are cited in this section.

Section 4.1 Approach to Environmental Analysis

California Department of Conservation. 2017. Farmland Mapping and Monitoring Program: Sacramento County Important Farmland 2016. Division of Land Resource Protection.

California Division of Mines and Geology. 1999. Plate 3: Mineral Land Classification Map of PCC-Grade Aggregate Resources in Sacramento County. In DMG Open File Report 99-09.

CDMG. *See* California Division of Mines and Geology.

DOC. *See* California Department of Conservation.

Section 4.2 Land Use and Planning

California Budget. 2021. *California Five-Year Infrastructure Plan 2021-22*. Available: https://ebudget.ca.gov/2021-Infrastructure-Plan.pdf. Accessed May 28, 2026.

California Department of General Services. 1997a (July). *1997 Capitol Area Plan, an Update of the 1977 Capitol Area Plan*. Managed by Office of Project Development and Management and Office of Real Estate and Design Services. Prepared by Dyett & Bhatia, Urban and Regional Planners, with assistance from ROMA Design Group, Van Meter Williams Pollack, and The Hoyt Company.

California Department of General Services. 1997b (July). *1997 Capitol Area Plan Implementation Program*. Managed by Office of Project Development and Management and Office of Real Estate and Design Services. Prepared by Dyett & Bhatia, Urban and Regional Planners, with assistance from ROMA Design Group, Van Meter Williams Pollack, and The Hoyt Company.

California Office of Historic Preservation. 2005 (September 7). *California State Law & Historic Preservation: Statutes, Regulations & Administrative Policies Regarding the Preservation & Protection of Cultural & Historical Resources*. Technical Assistance Series #10.

City of Sacramento. 2024a. *Sacramento 2040 General Plan*. Available: https://www.cityofsacramento.gov/content/dam/portal/cdd/Planning/Long-Range/general-plan-2040/Adopted%202040%20General%20Plan_20240227_full_Amended_20251118.pdf. Accessed May 28, 2026.

City of Sacramento. 2024b. *Sacramento 2040 General Plan Central City Community Plan*. Available: https://www.cityofsacramento.gov/content/dam/portal/cdd/Planning/adopted-2040-general-plan/2040%20GP_3-11b_Central%20City_Adopted.pdf. Accessed May 28, 2026.

DGS. *See* California Department of General Services.

Sacramento Area Council of Governments. 2025. *2025 Blueprint*. Available: https://www.sacog.org/home/showpublisheddocument/3392/639124545029430000. Accessed May 28, 2026.

Sacramento Area Council of Governments. 2019 (November). *2020 Metropolitan Transportation Plan/Sustainable Communities Strategy*. Available: https://www.sacog.org/home/showpublisheddocument/76/638212804736270000. Accessed May 28, 2026.

Section 4.3 Population, Employment, and Housing

California Department of Finance. 2026a (May). Estimates - E1 Population and Housing Estimates for Cities, Counties, and the State — January 1, 2025 and 2026. Available: https://dof.ca.gov/forecasting/demographics/estimates-e1/. Accessed May 19, 2026.

California Department of Finance. 2026b. P-2 County Population Projections. Available: https://dof.ca.gov/forecasting/demographics/projections/. Accessed May 19, 2026.

California Department of General Services. 2015 (January). *Capitol Area Plan Progress Report*.

California Employment Development Department. 2026a. Local Area Unemployment Statistics (LAUS), Annual Average. Available: https://data.ca.gov/dataset/local-area-unemployment-statistics-laus-annual-average/resource/0d49b0b6-a012-4041-82cb-acebd0d3e8b4?filters=Area%20Name%3ASacramento%20city. Accessed June 17, 2026.

California Employment Development Department. 2026b. Employment by Industry Data, Sacramento County, 2010-current. Available: https://labormarketinfo.edd.ca.gov/data/employment-by-industry.html. Accessed June 16, 2026.

City of Sacramento. 2023 (August). *Sacramento 2040 General Plan and Climate Action and Adaptation Plan*. SCH# 2019012048. Available: https://www.cityofsacramento.gov/content/dam/portal/cdd/Planning/Environmental-Impact-Reports/2040-gpu-and-caap/Sacramento-2040-Project-MEIR-8242023.pdf. Accessed June 17, 2026.

City of Sacramento. 2024a (February 27). *City of Sacramento Climate Action and Adaptation Plan*. Available: https://www.cityofsacramento.gov/content/dam/portal/cdd/Planning/Long-Range/Climate-Action-Plan/18-06051_Sac%20CAAP_Digital%20-%20Final%20Adopted%20FEB272024.pdf. Accessed June 17, 2026.

City of Sacramento. 2024b. *2024 Housing Element Annual Progress Report (Housing Production and Program Updates*. Available: https://www.cityofsacramento.gov/community-development/planning/housing/housing-element. Accessed June 17, 2026.

City of Sacramento. 2025. *2040 General Plan*. Available: https://www.cityofsacramento.gov/community-development/planning/long-range/general-plan/2040-general-plan. Accessed June 17, 2026.

DGS. *See* California Department of General Services.

DOF. *See* California Department of Finance.

EDD. *See* California Employment Development Department.

SACOG. *See* Sacramento Area Council of Governments.

Sacramento Area Council of Governments. 2020. *SACOG Regional Housing Needs Plan, Cycle 6 (2021-2029)*. https://www.sacog.org/home/showpublisheddocument/370/638218262676300000.

Sacramento Area Council of Governments. 2025a. *2025 Sacramento Region Blueprint*. Available: https://www.sacog.org/planning/2025-blueprint/2025-blueprint-plan. Accessed April 2, 2026.

Sacramento Area Council of Governments. 2025b. *Draft Environmental Impact Report for the 2025 Blueprint*. State Clearinghouse No. 2025020168. Available: https://www.sacog.org/home/showpublisheddocument/3065/638850807642200000. Accessed June 17, 2026.

US Census. 2022. Occupancy Status. Available: https://data.ca.gov/dataset/local-area-unemployment-statistics-laus-annual-average/resource/0d49b0b6-a012-4041-82cb-acebd0d3e8b4?filters=Area%20Name%3ASacramento%20city. Accessed June 16, 2026.

US Census. 2024. Selected Housing Characteristics from the 2024 ACS 5-Year Estimates Data Profiles. Available: https://data.census.gov/table/ACSDP5Y2024.DP04?q=Sacramento+city,+California&t=Housing:Housing+Value+and+Purchase+Price:Units+and+Stories+in+Structure:Vacancy:Vacancy+Characteristics. Accessed June 17, 2026.

US Census. 2026. QuickFacts: Sacramento City, California. Available: https://www.census.gov/quickfacts/fact/table/sacramentocitycalifornia/POP010210. Accessed May 19, 2026.

Section 4.4 Transportation and Circulation

California Department of Transportation. 2020. *Vehicle Miles Traveled-Focused Transportation Impact Study Guide*. Available: https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/division-transportation-planning/regional-and-community-planning/01-2020-05-20-approved-vmt-focused-tisg-v4-a11y.pdf. Accessed September 3, 2026.

Caltrans. *See* California Department of Transportation.

City of Sacramento. 2009 (July). *Design and Procedures Manual*, Section 15 - Street Design Standards. Available: https://www.cityofsacramento.gov/content/dam/portal/pw/Publications/Engineering/Development-Engineering/Design-Procedures-Manual/section15-street-design-standards.pdf. Accessed August 7, 2026.

City of Sacramento. 2018 (August). Transportation Permit. Available: https://www.cityofsacramento.gov/content/dam/portal/pw/Forms/Engineering/Development-Engineering/Transportation-Permits/TranspPmtConditionsRestrictions_8-1-18.pdf. Accessed August 7, 2026.

City of Sacramento. 2019a (May). *Development Engineering Major vs Minor Encroachment Permit Guidelines*. Available: https://www.cityofsacramento.gov/content/dam/portal/pw/Engineering/DE-501---Guidelines-Major-vs-Minor-Encroachment.pdf. Accessed August 7, 2026.

City of Sacramento. 2019b. Truck Routes. Available: https://www.cityofsacramento.gov/content/dam/portal/pw/Publications/Transportation/CityTruckRoutes.pdf. Accessed August 7, 2026.

City of Sacramento. 2021. *Pedestrian Crossing Guidelines*. Available: https://cityofsacramento.gov/content/dam/portal/pw/mas/Active-Transportation/Pedestrian-Crossing-Guidelines-April-2021.pdf. Accessed September 4, 2026.

City of Sacramento. 2024 (February). *Sacramento 2040 General Plan*. Available: https://www.cityofsacramento.gov/content/dam/portal/cdd/Planning/Long-Range/general-plan-2040/Adopted%202040%20General%20Plan_20240227_full_Amended_20251118.pdf. Accessed August 7, 2026.

City of Sacramento. 2025 (August). *Streets for People: Sacramento's Active Transportation Plan*. Available: https://www.cityofsacramento.gov/content/dam/portal/pw/mas/streets-for-people/Sacramento_ATP_Report_20251103.pdf. Accessed March 23, 2026.

SACOG. *See* Sacramento Area Council of Governments.

Sacramento Area Council of Governments. 2025. *Blueprint 2025*. Available at: https://www.sacog.ca.gov/planning/2025-blueprint/2025-blueprint-plan. Accessed August 13, 2026.

Sacramento Regional Transit. 2026. Routes & Schedules. Available: https://www.sacrt.com/schedules/#select. Accessed August 7, 2026.

SacRT. *See* Sacramento Regional Transit.

US Census Bureau. 2023. Longitudinal Employer-Household Dynamics. Available: https://lehd.ces.census.gov/. Accessed August 7, 2026.

Section 4.5 Utilities and Service Systems

California Department of General Services. 2015 (January). *Capitol Area Plan Progress Report*. Real Estate Services Division. Prepared by Asset Planning and Enhancement Branch. Accessed June 11, 2026.

California Department of Resources Recycling and Recovery. 2023. *SWIS Facility/Site Activity Details (Sacramento County Landfill (Kiefer) (34-AA-0001))*. Available: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2070?siteID=2507. Accessed June 8, 2026.

California Department of Resources Recycling and Recovery. 2024a. *Jurisdiction Review Reports*. Available: https://www2.calrecycle.ca.gov/LGCentral/AnnualReporting/ReviewReports/DisposalTonnageTrend. Accessed June 8, 2026.

California Department of Resources Recycling and Recovery. 2024b. *SWIS Facility/Site Activity Details (L and D Landfill (34-AA-0020))*. Available: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2087?siteID=2524. Accessed June 8, 2026.

California Department of Resources Recycling and Recovery. n.d.-a. *SWIS Facility/Site Activity Details (Elder Creek Transfer and Recovery (34-AA-0033)).* Available: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2095?siteID=2531. Accessed June 8, 2026.

California Department of Resources Recycling and Recovery. n.d.-b. *SWIS Facility/Site Activity Details (North Area Transfer Station (34-AA-0002)).* Available: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2071?siteID=2508. Accessed June 8, 2026.

California Department of Resources Recycling and Recovery. n.d.-c. *SWIS Facility/Site Activity Details (Sacramento Recycling & Transfer Station (34-AA-0195)).* Available: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2109?siteID=2543. Accessed June 8, 2026.

California Energy Commission. 2025 (July). *2025 Building Energy Efficiency Standards for Residential and Nonresidential Buildings*. Available: https://www.energy.ca.gov/sites/default/files/2025-07/CEC-400-2025-010-F_0.pdf. Accessed April 30, 2026.

California Energy Commission. 2026. *2024 California Annual Retail Fuel Outlet Report Results (CEC-A15).* Available: https://www.energy.ca.gov/media/3874. Accessed August 20, 2026.

California Energy Commission. n.d. *Clean Energy and Pollution Reduction Act – SB 350*. Available: https://www.energy.ca.gov/rules-and-regulations/energy-suppliers-reporting/clean-energy-and-pollution-reduction-act-sb-350. Accessed June 8, 2026.

California Public Utilities Commission. 2011. *2011 Energy Efficiency Strategic Plan*. Available: https://www.cpuc.ca.gov/-/media/cpuc-website/files/legacyfiles/c/5303-caenergyefficiencystrategicplan-jan2011.pdf. Accessed June 8, 2026.

CalRecycle. *See* California Department of Resources Recycling and Recovery.

CEC. *See* California Energy Commission.

Central Valley Regional Water Quality Control Board. 2015 (April). *Order R5-2015-0045, NPDES No. CA0079111, Waste Discharge Requirements for the City of Sacramento Combined Wastewater Collection and Treatment System, Sacramento County*.

Central Valley Regional Water Quality Control Board. 2026. National Pollutant Discharge Elimination System (NPDES) CA0079111 Order R5-2026-0003. Accessed June 11, 2026.

Central Valley RWQCB. *See* Central Valley Regional Water Quality Control Board.

City of Sacramento. 2021 (June). *2020 Urban Water Management Plan*. Available: https://www.cityofsacramento.gov/content/dam/portal/dou/Reports/Sacramento%202020%20UWMP%20-%20Final%20for%20DOU%20Website_redacted.pdf. Accessed April 30, 2026.

City of Sacramento. 2026a (May). *2025 Urban Water Management Plan*. Available: https://www.cityofsacramento.gov/content/dam/portal/dou/Reports/City%20of%20Sac%202025%20UWMP%20Public%20Draft.pdf. Accessed June 8, 2026.

City of Sacramento. 2026b (August 31). *SB 610/SB 221 Water Supply Assessment and Certification Form.*

CPUC. *See* California Public Utilities Commission.

DGS. *See* California Department of General Services.

State of California Green Buildings. 2012. *Executive Order B-18-12*. Available: https://www.green.ca.gov/buildings/resources/executiveorder/. Accessed June 8, 2026.

Section 4.6 Air Quality

California Air Pollution Control Officers Association. 2015. *The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*.

California Air Resources Board. 2013. *California Almanac of Emissions and Air Quality*. Available: https://ww2.arb.ca.gov/our-work/programs/resource-center/technical-assistance/air-quality-and-emissions-data/almanac. Accessed August 20, 2026.

California Air Resources Board. 2020. California Takes Bold Step to Reduce Truck Pollution. Available: https://ww2.arb.ca.gov/news/california-takes-bold-step-reduce-truck-pollution#:~:text=This%20new%20rule%20directly%20addresses%20disproportionate%20risks,%E2%80%9Clast%2Dmile%E2%80%9D%20delivery%20trucks%20and%20vans%20by%202040.&text=Statewide%2C%20the%20Advanced%20Clean%20Truck%20regulation%20will%20lower%20related%20premature%20deaths%20by%201%2C000. Accessed August 20, 2026.

California Air Resources Board. 2023. Maps of State and Federal Attainment Areas. Available: https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations. Accessed August 20, 2026.

California Air Resources Board. 2024. Table of Ambient Air Quality Standards. Available: https://ww2.arb.ca.gov/sites/default/files/2024-08/AAQS%20Table_ADA_FINAL_07222024.pdf. Accessed August 20, 2026.

California Air Resources Board. 2025. Advanced Clean Fleets. Available: https://ww2.arb.ca.gov/our-work/programs/advanced-clean-fleets/about. Accessed August 20, 2026.

California Office of Environmental Health Hazard Assessment. 2015 (February). *Air Toxics Hot-Spots Program Guidance Manual for the Preparation of Health Risk Assessments.* Available: https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf. Accessed August 20, 2026.

CAPCOA. *See* California Air Pollution Control Officers Association.

CARB. *See* California Air Resources Board.

EPA. *See* US Environmental Protection Agency.

Fehr & Peers. 2026. Vehicle Miles Travelled Analysis for the Capitol Mall Office Buildings Demolition Project.

National Highway Traffic Safety Administration. 2025a. USDOT Finalizes New Fuel Economy Standards for Model Years 2027-2031. Available: https://www.nhtsa.gov/press-releases/new-fuel-economy-standards-model-years-2027-2031. Accessed August 20, 2026.

National Highway Traffic Safety Administration. 2025b. The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule III for Model Years 2022 to 2031 Passenger Cars and Light Trucks. Available: https://www.nhtsa.gov/sites/nhtsa.gov/files/2025-12/CAFE-SAFE-MY-2022-2031-NPRM-TSD-tag-v2.pdf. Accessed August 20, 2026.

NHTSA. *See* National Highway Traffic Safety Administration.

OEHHA. *See* California Office of Environmental Health Hazard Assessment.

SACOG. *See* Sacramento Area Council of Governments.

Sacramento Area Council of Governments. 2019 (November 18). *2020 Metropolitan Transportation Plan/Sustainable Communities Strategy*. Available: https://www.sacog.ca.gov/planning/blueprint/2020-mtp-scs. Accessed August 20, 2026.

Sacramento Metropolitan Air Quality Management District. 2020. Thresholds of Significance Table. Available: https://www.airquality.org/LandUseTransportation/Documents/CH2ThresholdsTable4-2020.pdf. Accessed August 20, 2026.

Sacramento Metropolitan Air Quality Management District. 2021. *Second 10-Year PM10 Maintenance Plan For Sacramento County*. Available: https://www.airquality.org/ProgramCoordination/Documents/PM10%202nd%20Maintenance%20Plan%20-%20Final.pdf. Accessed August 18, 2026.

Sacramento Metropolitan Air Quality Management District. 2022. *Guide to Air Quality Assessment in Sacramento County*. Available: https://www.airquality.org/businesses/ceqa-land-use-planning/ceqa-guidance-tools. Accessed August 20, 2026.

SMAQMD. *See* Sacramento Metropolitan Air Quality Management District.

US Environmental Protection Agency. 2025. Criteria Air Pollutants. Available: https://www.epa.gov/criteria-air-pollutants. Accessed August 20, 2026.

US Environmental Protection Agency. 2026. *Greenbook*. Available: https://www.epa.gov/green-book. Accessed August 20, 2026.

Western Regional Climate Center. 2002. Prevailing Wind Direction. Available: https://wrcc.dri.edu/Climate/comp_table_show.php?stype=wind_dir_avg. Accessed August 20, 2026.

WRCC. *See* Western Regional Climate Center.

Section 4.7 Greenhouse Gas Emissions and Climate Change

California Air Resources Board. 2017 (November). *California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target*. Available: https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf. Accessed May 2022.

California Air Resources Board. 2021. *California Greenhouse Gas Emission Inventory*. 2021 Edition. Available: https://www.arb.ca.gov/cc/inventory/data/data.htm?utm_medium=email&utm_source=govdelivery. Accessed June 13, 2022

California Air Resources Board. 2022a. *2022 Scoping Plan Documents*. Available: https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents. Accessed June 13, 2022.

California Air Resources Board. 2022b. *Advanced Clean Cars Program*. Retrieved from: https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/about. Accessed October 18, 2022.

California Air Resources Board. 2025a. *CARB Receives Direction on Finalizing Low Carbon Fuel Standard Amendments*. Available: https://ww2.arb.ca.gov/news/carb-receives-direction-finalizing-low-carbon-fuel-standard-amendments#:~:text=On%20November%208%2C%202024%2C%20the,of%20zero%2Demission%20infrastructure%20and. Accessed July 9, 2025.

California Air Resources Board. 2025b. Advanced Clean Fleets. Available: https://ww2.arb.ca.gov/our-work/programs/advanced-clean-fleets. Accessed July 9, 2025.

California Air Resources Board. 2025c. California Greenhouse Gas Emissions from 2000 to 2023: Trends of Emissions and Other Indicators. Available: https://ww2.arb.ca.gov/sites/default/files/2025-11/nc-2000_2023_ghg_inventory_trends.pdf. Accessed April 21, 2026.

California Department of Water Resources and California Natural Resources Agency. 2023. *Water Year 2023: Weather Whiplash, From Drought To Deluge*. Available: https://water.ca.gov/-/media/DWR-Website/Web-Pages/Water-Basics/Drought/Files/Publications-And-Reports/Water-Year-2023-wrap-up-brochure_01.pdf. Accessed January 2026.

California Energy Commission. 2024a. *2024 Integrated Energy Policy Report Update*. Available: https://www.energy.ca.gov/publications/2024/2024-integrated-energy-policy-report-update. Accessed March 17, 2025

California Energy Commission. 2024b. Energy Commission Adopts Updated Building Standards Expanding Requirements for Heat Pumps and Electric-Ready Buildings. Available: https://www.energy.ca.gov/news/2024-09/energy-commission-adopts-updated-building-standards-expanding-requirements-heat. Accessed March 17, 2025.

California Natural Resources Agency. 2018. *Safeguarding California Plan: 2018 Update*. Available: http://resources.ca.gov/docs/climate/safeguarding/update2018/safeguarding-california-plan-2018-update.pdf. Accessed March 17, 2025.

California State University. 2024. California State University Sustainability Policy. Available: https://calstate.policystat.com/policy/16909281/latest/#autoid-nprmq. Accessed September 30, 2026.

CARB. *See* California Air Resources Board.

CEC. *See* California Energy Commission.

City of Sacramento. 2024a (February 27). *City of Sacramento Climate Action and Adaptation Plan*. Available: https://www.cityofsacramento.gov/content/dam/portal/cdd/Planning/Long-Range/Climate-Action-Plan/18-06051_Sac%20CAAP_Digital%20-%20Final%20Adopted%20FEB272024.pdf. Accessed August 20, 2026.

City of Sacramento. 2024b. Sacramento County 2021 GHG Inventory. Available: https://emd.saccounty.gov/content/dam/emd/docs/archive2/GHG_Inventory_Corrected_Final_Clean_April_2024.pdf. Accessed August 20, 2026.

CNRA. *See* California Natural Resources Agency.

DWR and CNRA. *See* California Department of Water Resources and California Natural Resources Agency.

EPA. *See* US Environmental Protection Agency.

European Commission Joint Research Centre. 2018. *Toward Climate Change Impact: Vectors Carrying Viral Infection. What We Should Know*.

Fehr & Peers. 2026. *Vehicle Miles Travelled Analysis for the Capitol Mall Office Buildings Demolition Project*.

Governor's Office of Planning and Research. 2018. *Technical Advisory on Evaluating Transportation Impacts in CEQA*. Available: https://lci.ca.gov/docs/20180416-743_Technical_Advisory_4.16.18.pdf. Accessed March 17, 2025.

International Panel on Climate Change. 2023a. *Climate Change 2023 Synthesis Report Summary for Policymakers*. Available: https://www.ipcc.ch/report/ar6/syr/downloads/report/IPCC_AR6_SYR_SPM.pdf. Accessed April 18, 2025.

International Panel on Climate Change. 2023b. *Climate Change 2023 Synthesis Report*. Available: https://www.ipcc.ch/report/ar6/syr/downloads/report/IPCC_AR6_SYR_FullVolume.pdf. Accessed April 18, 2025.

IPCC. *See* Intergovernmental Panel on Climate Change.

National Highway Traffic Safety Administration. 2025. USDOT Finalizes New Fuel Economy Standards for Model Years 2027-2031. Available: https://www.nhtsa.gov/press-releases/new-fuel-economy-standards-model-years-2027-2031. Accessed August 20, 2026.

National Oceanic and Atmospheric Administration. 2025a. *2024 Was the World's Warmest Year on Record*. Available: https://www.noaa.gov/news/2024-was-worlds-warmest-year-on-record. Accessed April 18, 2025.

National Oceanic and Atmospheric Administration. 2025b. *The Weather and Climate Influences on the January 2025 Fires around Los Angeles*. Authored by Rebecca Lindsey. Available: https://www.climate.gov/news-features/event-tracker/weather-and-climate-influences-january-2025-fires-around-los-angeles#:~:text=On%20January%207%2C%202025%2C%20a,and%20shrub%2Ddominated%20chaparral%20landscapes. Accessed April 18, 2025.

NHTSA. *See* National Highway Traffic Safety Administration.

NOAA. *See* National Oceanic and Atmospheric Administration.

OPR. *See* Governor's Office of Planning and Research.

Sacramento Metropolitan Air Quality Management District. 2020. Thresholds of Significance Table. Available: https://www.airquality.org/LandUseTransportation/Documents/CH2ThresholdsTable4-2020.pdf. Accessed August 20, 2026.

Sacramento Metropolitan Air Quality Management District. 2021. *Sacramento Metropolitan Air Quality Management District CEQA Guide* Chapter 6: Greenhouse Gases. Available: https://www.airquality.org/LandUseTransportation/Documents/Ch6GHG2-26-2021.pdf. Accessed August 20, 2026.

Sierra Nevada Conservancy. 2024. *Weather whiplash in the Sierra-Cascade and the need to accelerate resilience*. Available: https://sierranevada.ca.gov/weather-whiplash-in-the-sierra-cascade-and-the-need-to-accelerate-resilience/. Accessed September 25, 2025.

SMAQMD. *See* Sacramento Metropolitan Air Quality Management District.

SNC. *See* Sierra Nevada Conservancy.

US Environmental Protection Agency. 2016. *EPA and NHTSA Adopt Standards to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles for Model Year 2018 and Beyond.* Available: https://nepis.epa.gov/Exe/ZyPDF.cgi/P100P7NL.PDF?Dockey=P100P7NL.PDF. Accessed February 25, 2025.

US Environmental Protection Agency. 2026. *Final Rule: Rescission of the Greenhouse Gas Endangerment Finding and Motor Vehicle Greenhouse Gas Emission Standards Under the Clean Air Act*. Available: https://www.epa.gov/regulations-emissions-vehicles-and-engines/final-rule-rescission-greenhouse-gas-endangerment. Accessed August 20, 2026.

Section 4.8 Energy

AFDC. *See* Alternative Fuels Data Center

Alternative Fuels Data Center. 2026. California Transportation Data for Alternative Fuels and Vehicles. Available: https://afdc.energy.gov/states/ca. Accessed August 20, 2026.

California Air Resources Board. 2021. *Governor Newsom's Zero-Emission by 2035 Executive Order (N-79-20)*. Available: https://ww2.arb.ca.gov/resources/fact-sheets/governor-newsoms-zero-emission-2035-executive-order-n-79-20. Accessed August 20, 2026.

California Air Resources Board. 2022. *2022 Scoping Plan for Achieving Carbon Neutrality*. Available: https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents. Accessed August 20, 2026.

California Air Resources Board. 2025a. *CARB Receives Direction on Finalizing Low Carbon Fuel Standard Amendments*. Available: https://ww2.arb.ca.gov/news/carb-receives-direction-finalizing-low-carbon-fuel-standard-amendments#:~:text=On%20November%208%2C%202024%2C%20the,of%20zero%2Demission%20infrastructure%20and. Accessed August 20, 2026.

California Air Resources Board. 2025b. *Notice to the U.S. Environmental Protection Agency of California Air Resources Board's Withdrawal of the Advanced Clean Fleets Waiver Request*. Available: https://www.epa.gov/system/files/documents/2025-01/ca-acf-carb-withdrawal-ltr-2025-1-13.pdf. Accessed August 20, 2026.

California Air Resources Board. 2025c. Advanced Clean Fleets Regulation information webpage. Available: https://ww2.arb.ca.gov/our-work/programs/advanced-clean-fleets. Accessed March 17, 2025.

California Energy Commission. 2024. *Energy Commission Adopts Updated Building Standards Expanding Requirements for Heat Pumps and Electric-Ready Buildings*. Available: https://www.energy.ca.gov/news/2024-09/energy-commission-adopts-updated-building-standards-expanding-requirements-heat. Accessed August 20, 2026.

California Energy Commission. 2025a. *2024-2025 Investment Plan Update for Clean Transportation Program Commission Report.* Available: https://efiling.energy.ca.gov/GetDocument.aspx?tn=261539. Accessed August 20, 2026.

California Energy Commission. 2025b. 2024 California Annual Retail Fuel Outlet Report Results (CEC-A15). Available: https://www.energy.ca.gov/media/3874. Accessed August 20, 2026.

California Energy Commission. 2026a. Electricity Consumption by County. Available: https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-0. Accessed August 20, 2026.

California Energy Commission. 2026b. Gas Consumption by County. Available: https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-1. Accessed August 20, 2026.

CARB. *See* California Air Resources Board.

CEC. *See* California Energy Commission.

CSU. *See* California State University.

California State University. 2024. California State University Sustainability Policy. Available: https://calstate.policystat.com/policy/16909281/latest/#autoid-nprmq. Accessed September 30, 2026.

EPA. *See* US Environmental Protection Agency.

National Highway Traffic Safety Administration. 2024. *USDOT Finalizes New Fuel Economy Standards for Model Years 2027-2031.* Available: https://www.nhtsa.gov/press-releases/new-fuel-economy-standards-model-years-2027-2031. Accessed August 20, 2026.

US Environmental Protection Agency. 2025. *Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act*. Available: https://www.epa.gov/climate-change/endangerment-and-cause-or-contribute-findings-greenhouse-gases-under-section-202a. Accessed August 20, 2026.

Section 4.9 Noise and Vibration

California Department of Transportation. 2002. *California Airport Land Use Planning Handbook*. State of California Department of Transportation. Division of Aeronautics.

California Department of Transportation. 2013 (September). *Technical Noise Supplement.* California Department of Transportation Division of Environmental Analysis. Prepared by ICF Jones & Stokes.

California Department of Transportation. 2020 (April). *Transportation and Construction Vibration Guidance Manual*. Noise, Division of Environmental Analysis.

Caltrans. *See* California Department of Transportation.

City of Sacramento. 2024. (February). *2040 General Plan and Climate Action and Adaptation Plan*. Available:

EPA. *See* US Environmental Protection Agency.

Federal Highway Administration. 2004. Traffic Noise Model, Version 2.5. Available: https://www.fhwa.dot.gov/environment/noise/traffic_noise_model/tnm_v25/index.cfm. Accessed June 18, 2025.

Federal Highway Administration. 2006 (January). *Roadway Construction Noise Model User's Guide*. Prepared by the Research and Innovative Technology Administration.

Federal Highway Administration. 2019. (December). Technical Manual. Traffic Noise Model 3.0. U.S. Department of Transportation. Office of Natural Environment. Washington D.C.

Federal Transit Administration. 2018. *Transit Noise and Vibration Impact Assessment*. Available: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf. Accessed June 18, 2025.

Fehr & Peers. 2026. *Vehicle Miles Travelled Analysis for the Capitol Mall Office Buildings Demolition Project*.

FHWA. *See* Federal Highway Administration.

FTA. *See* Federal Transit Administration.

Lennox. 2019. *16ACX Merit Series Product Specifications*.

National Cooperative Highway Research Program. 1999. *Mitigation of Nighttime Construction Noise, Vibrations, and Other Nuisances*. Transportation Research Board. National Research Council.

NCHRP. *See* National Highway Research Program.

US Environmental Protection Agency. 1977 (May). *Speech Levels in Various Noise Environments*. Prepared by the Beranek and Newman, Inc.

Section 4.10 Geology and Soils

Bryant, William A. and Earl W. Hart. 2007. Fault-Rupture Hazard Zones in California Alquist-Priolo Earthquake Fault Zoning Act with Index to Earthquake Fault Zones Maps. Special Publication 24, Interim Revision 2007. Department of Conservation, California Geological Survey. Available: https://www.dtsc-ssfl.com/files/lib_ceqa/ref_draft_peir/Chap4_5-Geology/68321_Bryant,_WA_and_EW_Hart_2007.pdf. Accessed June 17, 2026.

California Geological Survey. 2026a. Earthquake Zones of Required Investigation. Available: https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/. Accessed June 19, 2026.

California Geological Survey. 2026b. Fault Activity Map of California. Available: https://maps.conservation.ca.gov/cgs/fam/. Accessed June 19, 2026.

California Geological Survey. 2026c. Earthquake Shaking Potential. Available: https://www.conservation.ca.gov/cgs/publishingimages/seismic-hazards/MS_048-Earthquake-Shaking-Potential.jpg. Accessed June 19, 2026.

California Geological Survey. 2026d. Ground Motion Hazard Maps. Available: https://maps.conservation.ca.gov/cgs/ms48/groundmotion/. Accessed June 19, 2026.

CGS. *See* California Geological Survey.

City of Sacramento. 2025. *2040 Sacramento General Plan*. Available: https://www.cityofsacramento.gov/content/dam/portal/cdd/Planning/Long-Range/general-plan-2040/Adopted%202040%20General%20Plan_20240227_full_Amended_20251118.pdf. Accessed August 24, 2026.

Hackel, Otto. 1966. *Summary of the Geology of the Great Valley, in Geology of Northern California*, Bailey, E. H., (Ed.), United States Geological Survey: California Division of Mines and Geology, Bulletin 190, 508 p.

Sacramento Central Groundwater Authority. 2012 (February). *Sacramento Central Groundwater Authority Groundwater Elevation Monitoring Plan*.

US Department of Agriculture, Natural Resources Conservation Service. 2026. *Web Soil Survey*. Available: https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx. Accessed June 18, 2026.

US Geological Survey. 2021. *The Severity of an Earthquake*. Available: https://pubs.usgs.gov/gip/earthq4/severitygip.html. Accessed September 2026.

US Geological Survey. 2026. *Areas of Land Subsidence in California*. Available: https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html. Accessed June 18, 2026.

USGS. *See* US Geological Survey.

Section 4.11 Hydrology and Water Quality

California Department of Water Resources. 2025. *California's Groundwater Bulletin 118: Sacramento Valley Groundwater Basin, South American Subbasin*. Available: https://water.ca.gov/programs/groundwater-management/bulletin-118. Accessed June 10, 2026.

Central Valley Regional Water Quality Control Board. 2019. (May). *The Water Quality Control Plan (Basin Plan) for the California Regional Water Quality Control Board, Central Valley Region*. Fifth edition. Available: https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_201805.pdf. Accessed May 15, 2019.

Central Valley Regional Water Quality Control Board. 2024. *2023-2024 California Integrated Report (303(d) List/305(b) Report)*. Supporting Documentation. Available: https://www.waterboards.ca.gov/losangeles/water_issues/programs/303d/index.html. Accessed June 10, 2026.

Central Valley RWQCB. *See* Central Valley Regional Water Quality Control Board.

City of Sacramento. 2024 (February). *Adopted City of Sacramento 2040 General Plan*. Available: https://www.cityofsacramento.gov/community-development/planning/long-range/general-plan/2040-general-plan. Accessed August 4, 2026.

DWR. *See* California Department of Water Resources.

Federal Emergency Management Agency. 2024. Flood Insurance Rate Map. Panel Numbers 06067C0180J. Available: https://msc.fema.gov/portal/search?AddressQuery=800%20capitol%20mall%20sacramento. Accessed June 10, 2026.

FEMA. *See* Federal Emergency Management Agency.

Sacramento Central Groundwater Authority. 2012 (February). *Sacramento Central Groundwater Authority Groundwater Elevation Monitoring Plan*.

Sacramento County Water Agency. 2006 (February). *Central Sacramento County Groundwater Management Plan*. Available: http://www.scgah2o.org/documents/CSCGMP_final.pdf. Accessed May 15, 2019.

SCGA. *See* Sacramento Central Groundwater Authority.

SCWA. *See* Sacramento County Water Agency.

US Geological Survey. 2000. *Water Quality in the Sacramento River Basin California, 1994–1998.* Circular 1215.

USGS. *See* US Geological Survey.

Section 4.12 Hazards and Hazardous Materials

City of Sacramento. 2025. *Sacramento 2040 General Plan*. Available: https://www.cityofsacramento.gov/community-development/planning/long-range/general-plan/2040-general-plan. Accessed June 8, 2026.

California Department of General Services. 2021a (February). Asbestos Notification, State Personnel Board Building (#021) 801 Capitol Mall, Sacramento.

California Department of General Services. 2021b (February). Asbestos Notification, EDD Building (#025) 722/800 Capitol Mall, Sacramento.

California Department of Toxic Substances. 2026a. EnviroStor. Available: https://www.envirostor.dtsc.ca.gov/public/. Accessed June 8, 2026.

California Department of Toxic Substances. 2026b. A-B-C CLEANERS (34720001). Available: https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=34720001. Accessed June 8, 2026.

California Department of Toxic Substances. 2026c. MATHER MIL AF (J09CA0012) (80000013) Available: https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=80000013. Accessed June 8, 2026.

California Department of Toxic Substances. 2026d. MATHER STORAGE ANX (J09CA0081) (80000054). Available: https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=80000054. Accessed June 8, 2026.

State Water Resources Control Board. 2026. GeoTracker. Available: https://geotracker.waterboards.ca.gov/map/?global_id=T0607302824. Accessed June 8, 2026.

DGS. *See* California Department of General Services.

DTSC. *See* California Department of Toxic Substances

EMG. 2015a (June). *Personnel Building (021) 801 Capitol Mall, Sacramento, CA 95814 Facility Condition Assessment*. Prepared for the State of California Department of General Services.

EMG. 2015b (June). *Employment Development Department Headquarters (025) 722/800 Capitol Mall, Sacramento, CA 95814 Facility Condition Assessment*. Prepared for the State of California Department of General Services.

Sacramento County. (September) 2021. *Sacramento County Multi-Jurisdictional Local Hazard Mitigation Plan*. Available: https://waterresources.saccounty.gov/us/en/stormready/hazards/mitigation-plan/2021.html#gsc.tab=0. Accessed June 8, 2026.

Section 4.13 Cultural Resources

Ascent. 2026. Draft Department of Parks and Recreation 523 form set prepared for the State Office Building – Site 3.

Bennyhoff, James A., and David A. Fredrickson. 1969. A Proposed Integrative Taxonomic System for Central California Archaeology. In *Toward a New Taxonomic Framework for Central California Archaeology*, edited by Richard E. Hughes, pp. 15-24. University of California Archaeological Research Facility Contributions No. 51. Berkeley.

California State Capitol Museum. 2016. *California State Capitol Museum: Capitol Park Tree Guide*. Available: http://capitolmuseum.ca.gov/images/pdf/CapitolParkTreeBooklet.pdf.

City of Sacramento. 2018 (March). *Central Core Design Guidelines, 2nd Edition*. Available: https://www.cityofsacramento.gov/content/dam/portal/cdd/Planning/Urban-Design/central-city-guidelines/CC%20Urban%20Design%20Guide%20-%20Section%203%20Ch%201.pdf. Accessed March 27, 2026.

Dreyfuss & Blackford Architects and Page & Turnbull. 2006 (December 18). Chapter 3.0, Historic Structure Report. In *State Capitol Infrastructure Study*, Volume II.

Fredrickson, David A. 1973. Early Cultures of the North Coast Ranges, California. Unpublished Ph.D. dissertation, Department of Anthropology, University of California, Davis.

Hamilton, C. M., W. M. Nettles, B. Ludwig, and C. Gross. 2005. *The Many Faces of a City: Research Design for Recovery of Archaeological Deposits in Areas of West Side Projects, City of Sacramento, California*. Prepared by Applied EarthWorks, Inc. on behalf of EDAW. On file at California Department of General Services-Real Estate Division.

Lemon, D., and C. Davis. 2018. *Memorandum re: Proposed O Street Office Building Project, Public Resource Code (PRC) 5024.5 Consultation and Impacts Analysis, California State Government Building District*. Prepared by Senior Architectural Historians, ICF for California Department of General Services.

Moratto, Michael J. 1984. *California Archaeology*. Academic Press, Orlando, Florida.

Page & Turnbull. n.d. *Capitol Historic District Plan*. Prepared for the City of Sacramento. Available: https://www.cityofsacramento.gov/content/dam/portal/cdd/Planning/Urban-Design/Preservation/Adopted-Historic-District-Plans/Capitol-HDP.pdf.

Stevens, Nathan, Jelmer Eerkens, Jeffrey Rosenthal, Richard Fitzgerald, Joanne Goodsell, and Jamie Doty. 2009. *Workaday Windmiller: Another look at Early Horizon Lifeways in Central California*. Society of California Archaeologist Proceedings, Volume 23.

Woodward, L. 1981 (October). *A Documentary History of California's State Capitol*. California State Capitol Restoration Project. Available: https://capitolcommission.legislature.ca.gov/sites/capitolcommission.legislature.ca.gov/files/documentary_history_of_ca.pdf.

Section 4.14 Tribal Cultural Resources

Ione Band of Miwok Indians. 2025. Departments. Available: https://ionemiwok.net/departments/. Accessed March 27, 2025.

JCC. *See* Judicial Council of California.

Judicial Council of California. 2020. *Archaeological Mitigation Plan and Tribal Cultural Resources Treatment Plan for the New Sacramento Courthouse Project, City of Sacramento, Sacramento County, California*. Prepared by John Nadolski, Stantec. [Confidential]

Levy, R. 1978. Eastern Miwok. In, *California Handbook of North American Indians*, Vol. 8, ed. R. F. Heizer and W. C. Sturtevant, 398-413. Washington, D.C: Smithsonian Institution.

Private School Review. 2025. United Auburn Indian Community Tribal School. Available: https://www.privateschoolreview.com/united-auburn-indian-community-tribal-school-profile. Accessed March 27, 2025.

Shingle Springs Band of Miwok Indians. 2025a. Departments. Available: https://www.shinglespringsrancheria.com/departments/. Accessed March 27, 2025.

Shingle Springs Band of Miwok Indians. 2025b. Tribal Court. Available: https://www.shinglespringsrancheria.com/tribal-court/. Accessed March 27, 2025.

SSBMI. *See* Shingle Springs Band of Miwok Indians.

Tremaine, Kim. 2018a. Department of Parks and Recreation 523 Forms for Pit House Site (P-34-002359). On file at the North Central Information Center. [Confidential]

Tremaine, Kim. 2018b. Department of Parks and Recreation 523 Forms for Sacramento River TCL (P-34-005225). On file at the North Central Information Center. [Confidential]

UAIC. *See* United Auburn Indian Community of the Auburn Rancheria

United Auburn Indian Community of the Auburn Rancheria. 2025a. United Auburn Indian Community – Our Culture. Available: https://www.auburnrancheria.com/about-us/our-culture-1/. Accessed May 8, 2025.

United Auburn Indian Community of the Auburn Rancheria. 2025b. United Auburn Indian Community – Programs & Services. Available: https://www.auburnrancheria.com/programs-services/. Accessed May 8, 2025.

Wilson, N. L., and A. H. Towne. 1978. Nisenan. In, *California Handbook of North American Indians, Vol. 8*, ed. R. F. Heizer and W. C. Sturtevant, 387-397. Washington, D.C: Smithsonian Institution.

Wilton Rancheria. 2025a. Wilton Rancheria. Departments - Education. Available: https://wiltonrancheria-nsn.gov/departments/education/. Accessed March 27, 2025.

Wilton Rancheria. 2022b. Tribal Court. Available: https://wiltonrancheria-nsn.gov/tribal-government/tribal-court/. Accessed March 27, 2025.

Section 4.15 Biological Resources

CAL FIRE. *See* California Department of Forestry and Fire Protection.

California Department of Fish and Wildlife. 2014. Essential Connectivity Areas – California Essential Habitat Connectivity (CEHC) [ds620]. California Department of Fish and Wildlife Biogeographic Data Branch.

California Department of Fish and Wildlife. 2017. Natural Landscape Blocks – California Essential Habitat Connectivity (CECH) [ds621]. California Department of Fish and Wildlife Biogeographic Data Branch.

California Department of Fish and Wildlife. 2023. *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species*. Available: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline

California Department of Fish and Wildlife. 2026. Special Animals List. Available: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109406&inline. Retrieved May 13, 2026.

California Department of Forestry and Fire Protection. 2026. California Vegetation – WHRTYPE. Available: https://www.arcgis.com/home/item.html?id=35b4d77128264b3bacd31d9685f974b7. Accessed May 13, 2026.

California Native Plant Society. 2026. Rare Plant Inventory (online edition, v9.5). Results of electronic records search of the following US Geological Survey quadrangles: Carmichael, Citrus Heights, Clarksburg, Elk Grove, Florin, Rio Linda, Sacramento East, Sacramento West, and Taylor Monument. Available: http://www.rareplants.cnps.org. Retrieved May 7, 2026.

California Natural Diversity Database. 2026. Results of electronic records search of the following US Geological Survey quadrangles: Carmichael, Citrus Heights, Clarksburg, Elk Grove, Florin, Rio Linda, Sacramento East, Sacramento West, and Taylor Monument. California Department of Fish and Wildlife, Biogeographic Data Branch. Retrieved May 7, 2026.

CDFW. *See* California Department of Fish and Wildlife.

CNDDB. *See* California Natural Diversity Database.

CNPS. *See* California Native Plant Society.

eBird. 2026. Results of electronic records searches of the following species: Swainson's hawk. Cornell Lab of Ornithology. Ithica, NY. Available: https://ebird.org/. Retrieved May 13, 2026.

iNaturalist. 2026. Species observations in the project vicinity. Available: https://www.inaturalist.org/. Retrieved May 13, 2026.

US Fish and Wildlife Service. 2026. Information for Planning and Consultation electronic records search. Available: https://ecos.fws.gov/ipac/. Retrieved May 13, 2026.

US Fish and Wildlife Service and National Marine Fisheries Service. 2026 (July 14). Rescinding the Definition of "Harm" Under the Endangered Species Act. 91 *Federal Register* 43300-43317.

USFWS. *See* US Fish and Wildlife Service.

USFWS and NMFS. *See* US Fish and Wildlife Service and National Marine Fisheries Service.

Western Monarch and Milkweed Occurrence Database. 2026. Data accessed from the Western Monarch Milkweed Mapper, a project by the Xerces Society, US Fish and Wildlife Service, Idaho Department of Fish and Game, and Washington Department of Fish and Wildlife. Available: www.monarchmilkweedmapper.org. Accessed May 13, 2026.

Xerces Society. 2018. *A Petition to the State of California Fish and Game Commission to List the Crotch bumble bee (*Bombus crotchii*), Franklin's bumble bee (*Bombus franklini*), Suckley cuckoo bumble bee (*Bombus suckleyi*), and western bumble bee (Bombus occidentalis) as Endangered under the California Endangered Species Act*. Available: https://xerces.org/publications/policy-position-statements/petition-to-state-of-california-fish-and-game-commission-to.

Xerces Society, Wildlife Preservation of Canada, York University, University of Ottawa, The Montreal Insectarium, The London Natural History Museum, and BeeSpotter. 2026. Data accessed from Bumble Bee Watch. Available: https://www.bumblebeewatch.org/maps/. Accessed May 13, 2026.

Section 4.16 Public Services and Recreation

California Department of Education. 2026. Annual Enrollment. Available: https://www.cde.ca.gov/ds/ad/edtop.asp. Accessed June 11, 2026.

California Department of General Services. 1997 (October). *1997 Capitol Area Plan, An Update of the 1977 Capital Area Plan*.

California Highway Patrol. 2026. Capitol Protection Section. Available: https://www.chp.ca.gov/find-an-office/headquarters/assistant-commissioner-field/protective-services-division/capitol-protection-section. Accessed June 5, 2026.

CHP. *See* California Highway Patrol.

City of Sacramento. 2024a. *Sacramento 2040 General Plan, Youth, Parks, Recreation, and Open Space Element*. Adopted February 27, 2024.

City of Sacramento. 2024b. *Parks Plan 2040*. Adopted August 2024. Available: https://www.cityofsacramento.gov/ypce/parks/planning---development/park-plan. Accessed June 1, 2026.

City of Sacramento. 2026. *Fire Stations*. Available: https://www.cityofsacramento.gov/fire/about-sacramento-fire/station-information. Accessed June 11, 2026.

DGS. *See* California Department of General Services.

National Center for Education Statistics. 2018 (April). *Projections of Education Statistics to 2026*. Forty-fifth Edition. Available: https://nces.ed.gov/use-work/resource-library/report/compendium/projections-education-statistics-2026. Accessed June 11, 2026.

Sacramento Fire Department. 2026 (May). *Emergency Medical Services Division Audit*. City of Sacramento Office of the City Auditor.

Sacramento Fire Department. n.d. *City of Sacramento Fire Department 2017 Annual Report*.

Sacramento Police Department. 2024. *Sacramento Police Department Overview*. Available: https://www.cityofsacramento.gov/content/dam/portal/police/your-sacpd/about-spd/Annual-Reports/2024%20Sacramento%20Police%20Department%20Overview.pdf. Accessed June 11, 2026.

SFD. *See* Sacramento Fire Department.

SPD. *See* Sacramento Police Department.

Section 4.17 Aesthetics, Light, and Glare

California Building Standards Code. 2025. Title 21, Part 11. Available: https://codes.iccsafe.org/content/CAGBC2025P1. Accessed May 12, 2026.

California Department of General Services. 1997 (October). *1997 Capitol Area Plan, An Update of the 1977 Capital Area Plan*.

California Department of Transportation. 2026. Statewide Scenic Highway. Available: https://experience.arcgis.com/experience/47e2009986264718a5a13a2c81382774. Accessed March 27, 2026.

California Office of Historic Preservation. 2005 (September 7). *California State Law & Historic Preservation: Statutes, Regulations & Administrative Policies Regarding the Preservation & Protection of Cultural & Historical Resources*. Technical Assistance Series #10.

Caltrans. *See* California Department of Transportation.

CBSC. *See* California Buildings Standards Code.

City of Sacramento. 2018 (March). *Central City Design Guidelines* Section 3, Chapter 1: Central Core Design Guidelines. Available: https://www.cityofsacramento.gov/content/dam/portal/cdd/Planning/Urban-Design/central-city-guidelines/CC%20Urban%20Design%20Guide%20-%20Section%203%20Ch%201.pdf. Accessed March 27, 2026.

City of Sacramento. 2024. *2040 General Plan*. Available: https://www.cityofsacramento.gov/content/dam/portal/cdd/Planning/Long-Range/general-plan-2040/Adopted%202040%20General%20Plan_20240227_full_Amended_20251118.pdf. Accessed March 27, 2026.

DGS. *See* California Department of General Services.

Federal Highway Administration. 2015 (January). *Guidelines for the Visual Impact Assessment for Highway Projects.* Contract DTFH61-11-D-00033.

Chapter 5 Cumulative Impacts

CADA. *See* Capitol Area Development Authority.

California Department of Finance. 2026. Population Estimates for Cities, Counties, and the State—January 1, 2025 and 2026 (E-1). Available: https://dof.ca.gov/forecasting/demographics/estimates-e1/. Accessed August 17, 2026.

California Department of General Services. 1997 (July). *1997 Capitol Area Plan: An Update of the 1977 Capitol Area Plan*. Prepared by Dyett & Bhatia, Urban and Regional Planners, with assistance from ROMA Design Group, Van Meter Williams Pollack, and The Hoyt Company.

Capitol Area Development Authority. 2025. *Annual Capitol Area Plan Report*. Available: https://cada.org/wp-content/uploads/CADA-2025-Year-End-Report.pdf. Accessed September 2, 2026.

City of Sacramento. 2018. *Sacramento 2040 General Plan Central City Community Plan*. Available: https://www.cityofsacramento.gov/content/dam/portal/cdd/Planning/adopted-2040-general-plan/2040%20GP_3-11b_Central%20City_Adopted.pdf. Accessed September 3, 2026.

City of Sacramento. 2021. (December). *City of Sacramento 2021–2029 Housing Element*. Adopted August 17, 2021.

City of Sacramento. 2023. *Draft Master Environmental Impact Report for the City of Sacramento 2040 General Plan and Climate Action and Adaptation Plan* (SCH 2019012048). Available: https://files.ceqanet.lci.ca.gov/202435-3/attachment/MhT2vr6FqBbUHEQfC4PeEGZy_T9npzpfRqUQKrM4ASH5og-ONYkXfNUHrRD67uUhghMvGdq544raIncZ0. Accessed September 2, 2026.

City of Sacramento. 2024 (February 27). *City of Sacramento 2040 General Plan*. Available here: https://www.cityofsacramento.gov/content/dam/portal/cdd/Planning/Long-Range/general-plan-2040/Adopted%202040%20General%20Plan_20240227_full_Amended_20251118.pdf.

City of Sacramento. 2025. (August). *Streets for People: Sacramento's Active Transportation Plan*. Available: https://www.cityofsacramento.gov/content/dam/portal/pw/mas/transportation-planning/streets-for-people/Sacramento_ATP_Report_20251103.pdf. Accessed September 2, 2026.

DGS. *See* California Department of General Services.

EDD. *See* Employment Development Department.

Employment Development Department. 2026. Local Area Unemployment Statistics (LAUS), Annual Average. Available: https://data.ca.gov/dataset/local-area-unemployment-statistics-laus-annual-average/resource/0d49b0b6-a012-4041-82cb-acebd0d3e8b4?filters=Area%20Name%3ASacramento%20city. Accessed June 17, 2026.

Intergovernmental Panel on Climate Change. 2021. Sixth Assessment Report, Working Group 1: The Physical Science Basis. Available: https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_FullReport.pdf. Accessed September 28, 2026.

IPCC. *See* Intergovernmental Panel on Climate Change.

Sacramento Area Council of Governments. 2025. *Metropolitan Transportation Plan/Sustainable Communities Strategy EIR*. State Clearinghouse No. 2025020168. Available: https://www.sacog.org/home/showpublisheddocument/3065/638850807642200000. Accessed June 17, 2026.

SACOG. *See* Sacramento Area Council of Governments.

Sacramento Metropolitan Air Quality Management District. 2020. Thresholds of Significance Table. Available: https://www.airquality.org/LandUseTransportation/Documents/CH2ThresholdsTable4-2020.pdf. Accessed August 20, 2026.

SMAQMD. *See* Sacramento Metropolitan Air Quality Management District.

Chapter 6 Other CEQA Sections

California Employment Development Department. 2026. Local Area Unemployment Statistics (LAUS), Annual Average. Available: https://data.ca.gov/dataset/local-area-unemployment-statistics-laus-annual-average/resource/0d49b0b6-a012-4041-82cb-acebd0d3e8b4?filters=Area%20Name%3ASacramento%20city. Accessed June 17, 2026.

EDD. *See* California Employment Development Department.

Federal Transit Administration. 2018. *Transit Noise and Vibration Impact Assessment*. Available: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf. Accessed June 18, 2025.

FTA. *See* Federal Transit Administration.

National Cooperative Highway Research Program. 1999. *Mitigation of Nighttime Construction Noise, Vibrations, and Other Nuisances*. Transportation Research Board. National Research Council.

NCHRP. *See* National Highway Research Program.

Chapter 7 Alternatives

Perkins and Will. 2021 (May). *Capitol Mall Housing Study (722-800 Capitol Mall/751 N Street Sacramento).*

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