

PROPOSED MITIGATED NEGATIVE DECLARATION

PROJECT: 8TH AND R STREET PARKING STRUCTURE PROJECT

Lead Agency: Capitol Area Development Authority

The Capitol Area Development Authority (CADA), a joint powers authority between the State of California and the City of Sacramento, is partnering with the California Department of General Services (DGS) to develop a parking structure at 805 R Street in downtown Sacramento, as authorized by California Government Code Section 14678.7. CADA has two primary purposes: (a) management, maintenance, and rehabilitation of existing state-owned and CADA-owned residential and commercial buildings and (b) development and construction of new residential and commercial projects consistent with the Capitol Area Plan (CAP), including neighborhood improvements and amenities. State agencies are not subject to local or county land-use plans, policies, and zoning regulations.

Under CEQA, an Initial Study must consider if a project would “conflict any applicable land use plan, policy, or regulation with jurisdiction over a project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect” (State CEQA Guidelines Appendix G, X[b]). The project is located in the City of Sacramento, but the site owned by DGS and the project would be implemented by CADA. Neither CADA nor DGS are subject to local land-use regulations. City-adopted land-use plans, policies, and regulations are not applicable to the project. For this reason, the Initial Study need not, as a matter of law, consider such plans, policies, and regulations. Nevertheless, in the exercise of its discretion, CADA referenced, described, and addressed local land-use plans, policies, and regulations that are applicable to the 8th and R Street Parking Structure Project throughout the Initial Study. In addition, in some instances local policies and regulations provide the basis for significance thresholds used in this Initial Study (e.g., local noise standards) as these local standards provide the appropriate thresholds for assessing the significance of environmental effects.

CADA took this approach for several reasons. First, CADA 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 therefore assisted CADA 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 CADA 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 CADA 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 the City of Sacramento 2035 General Plan, this CEQA document provides the City with the information necessary to make the consistency determination related to required encroachment and utility permits. This consideration of local regulations by a State agency is consistent with other State CEQA documents.

PROJECT DESCRIPTION SUMMARY

The Initial Study and Mitigated Negative Declaration (IS/MND) evaluates the environmental effects of the 8th and R Street Parking Structure (project). The project involves demolishing and removing the existing State-owned Department of General Services (DGS) warehouse and privately-owned surface parking located on R Street between 8th and 9th Streets and Quill Alley in downtown Sacramento and developing a parking structure with retail space fronting R Street, as authorized by California Government Code Section 14678.7.

The State's Capitol Area Plan (CAP), the CAP Implementation Program, and the 2015 CAP Progress Report designate the project site as Parking. The City of Sacramento General Plan designates the project site as Residential Mixed Use and the block is zoned RMX-SPD (Residential Mixed Use-Special Planning District, City Code 17.212.110). The RMX district permits multifamily residential, commercial, and institutional uses in a mixture established for the area through a special planning district or adopted locational standards (City of Sacramento 2017). The R Street Corridor Special Planning District identifies the project site as a State parking structure and the RMX zone allows for stand-alone parking facilities (with approval of a conditional use permit, subject to the limitations specified). Although the project is not subject to local land use plans and would not require a conditional use permit, it would be consistent with these designations. The proposed project would involve demolition and removal of the existing DGS warehouse and development of a parking structure at 805 R Street that serves State employees and the community. The retail in the ground floor of the project would support the R Street Corridor and the activation of the block between 8th and 9th Streets.

The proposed parking structure would be up to seven levels, standing up to approximately 75 feet tall. The proposed approximately 265,000-square-foot double-bay parking structure would face R Street, providing an estimated 800–850 total parking spaces. The structure would span the entire length of the block between 8th and 9th Streets with the footprint extending to Quill Alley, approximately 325 feet by 165 feet, while the area of ground disturbance would be approximately 330 feet by 180 feet. Vehicular ingress and egress would be positioned at the ends of the structure with curb cuts on both 8th Street and 9th Street. The parking structure would have two pedestrian access points with both elevators and stairs. The primary pedestrian access would be from R Street. The parking levels and pedestrian access would be differentiated and signed for simple way-finding for both drivers and pedestrians.

The parking structure would primarily serve existing State office buildings in the downtown area. However, the parking structure would be equipped with parking control systems to provide secure access for monthly patrons. Additionally, systems would be established for public parking during non-business hours and possibly a limited amount of public parking on an hourly basis during business hours.

Approximately 5 to 10 percent of the parking spaces would be electrical vehicle charging stations. Bicycle and motorcycle parking would also be accommodated. Long-term bicycle parking would be provided in the parking structure and bicycle racks would be installed outside the parking structure.

The intersections of 8th and R Street and 9th and R Street would be painted for crosswalks and would include corner ramps and bulb-outs to support pedestrian safety.

FINDINGS

An Initial Study has been prepared to assess the project's potential effects on the environment and the significance of those effects. Based on the Initial Study, it has been determined that the project would not have any significant effects on the environment once mitigation measures are implemented. This conclusion is supported by the following findings:

1. The project would have no impact related to agriculture and forest resources and mineral resources.
2. The project would have a less-than-significant impact on air quality, geology and soils, greenhouse gases, land use and planning, population and housing, public services, recreation, and transportation and traffic.
3. Mitigation is required to reduce potentially significant impacts related to aesthetics, biological resources, cultural resources, hazards and hazardous materials, hydrology and water quality, noise, tribal cultural resources, and utilities and service systems to less-than-significant levels.

Following are the mitigation measures that shall be implemented by CADA to avoid or minimize environmental impacts. Implementation of these mitigation measures would reduce the environmental impacts of the project to a less-than-significant level.

Aesthetics

Mitigation Measure 3.1-1: Implement lighting plan consistent with Title 24 and the CALGreen Code

CADA shall implement a lighting plan that is consistent with California's Title 24 building energy efficiency standards, which will reduce both the generation of exterior light and the potential for light trespass to affect off-site areas. CADA shall meet the lighting and glare standards contained in the CALGreen Code that limit light and glare for State-owned buildings. Compliance with Title 24 and CALGreen Code requirements are generally consistent with Policies ER 7.1.3 and ER 7.1.4 of the Sacramento 2035 General Plan that pertain to lighting and reflective glass.

Significance after Mitigation

Through compliance with Mitigation Measure 3.1-1, the project would reduce light pollution and would avoid the use of highly reflective architectural materials for building design. Because the amount and intensity of light emitted would be similar to the current surrounding urban setting, the nighttime views from sensitive (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. 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 and this impact is **less than significant**.

Biological Resources

Mitigation Measure 3.4-1: Implement measures to protect bat colonies

To mitigate for activities requiring removal of roosting bats from buildings, pre-construction surveys for roosting bats will be conducted by a qualified biologist within 14-days before initiating building demolition. Surveys will consist of a daytime pedestrian survey looking for evidence of bat use (e.g., guano) and an evening emergence survey to note the presence or absence of bats. The type of survey will depend on the condition of the buildings. If no active bat roosts are found, then no further study is required. If evidence of bat use is observed, the species and approximate number of bats using the roost will be determined.

If active roosts are determined to be present and must be removed, the bats will be excluded from the roosting site before building demolition is initiated. Exclusion methods and roost removal procedures will be developed in consultation with CDFW before implementation but would not occur if lactating females or dependent young are present (maternity colony roosts can be active from early April until mid-October). Exclusion methods may include use of one-way doors at roost entrances (bats may leave but not reenter) or sealing roost entrances when the site can be confirmed to contain no bats.

Significance after Mitigation

Implementation of this mitigation measure would reduce potentially significant impacts to bat colonies to a **less-than-significant** level by surveying for bats prior to disturbance to potential active roosts, and minimizing impacts if they are present by excluding the bats from the roost habitat to be removed.

Mitigation Measure 3.4-2: Comply with City of Sacramento Tree Preservation Ordinance

CADA has coordinated with the City's urban forester regarding the removal of City street trees (Leon, pers. comm., 2017). CADA will continue to coordinate with the City and will mitigate for the removal of any City street trees by implementing the following measures:

- ▲ CADA shall provide the City with the number, location, species, health, and sizes of trees that may be removed, relocated, and/or replaced due to project construction.

- ▲ CADA shall coordinate with the City's urban forester on, and shall implement, the required tree protection, replanting, or replacement as well as the maintenance, success criteria, and monitoring for all trees planted or retained on the project site.

Significance after Mitigation

Mitigation Measure 3.4-2 requires compliance with the City's Tree Preservation Ordinance, which would reduce significant impacts to City street trees to a **less-than-significant** level by replanting or replacement as well as implementing maintenance, success criteria, and monitoring for all trees planted or retained on the project site.

Cultural Resources

Mitigation Measure 3.5-1. Conduct mandatory cultural resources awareness training for all project construction personnel associated with building demolition and earth moving

Before building demolition and any ground-disturbing work (including vegetation clearing, grading, and equipment staging) commences, a qualified archaeologist will conduct a mandatory cultural resources awareness training for all construction personnel involved with these activities. The training will cover the cultural history of the area, characteristics of archaeological sites, applicable laws, and the avoidance and minimization measures to be implemented. Proof of personnel attendance will be provided to overseeing agencies as appropriate. If new construction personnel associated with building demolition and ground-disturbing work are added to the proposed project after the training has been conducted, the contractor will ensure that the new personnel receive the mandatory training before starting work.

Mitigation Measure 3.5-2. Implement measures to protect previously unidentified cultural resources

Construction shall stop if potential cultural resources are encountered. It is possible that previous activities have obscured surface evidence of cultural resources. If signs of an archeological site, such as any unusual amounts of stone, bone, shell, ceramics, glass, or metal are uncovered during grading or other construction activities, work will be halted within 100 feet of the find and the appropriate agency will be notified. A qualified archeologist will be consulted for an onsite evaluation. If the site is, or appears to be, eligible for listing in the CRHR or NRHP, additional mitigation, such as further testing for evaluation or data recovery, may be necessary.

In the event resources are discovered, a qualified archaeologist will assess the find and determine whether the resource requires further study. Any previously undiscovered resources found during construction will be recorded on appropriate California Department of Parks and Recreation 523 forms and evaluated for significance under all applicable regulatory criteria.

All work will stop in the immediate vicinity of the find. If the find is determined to be an important cultural resource, the CADA will make available contingency funding and a time allotment sufficient to allow recovery of an archaeological sample or to implement an avoidance measure. Construction work can continue on other parts of the project while archaeological mitigation takes place.

Significance after Mitigation

Implementation of Mitigation Measures 3.5-1 and 3.5-2 would reduce archaeological resource impacts to a **less-than-significant** level by requiring trained construction personnel, requiring work to stop if suspected archaeological resources are found, onsite evaluation by a qualified archaeologist, and determination of any necessary recordation.

Mitigation Measure 3.5-3. Implement measures if construction activities inadvertently discover or disturb human remains

If human remains are discovered during any phase of construction, including disarticulated or cremated remains, the construction contractor will immediately cease all ground-disturbing activities within 100 feet of the remains and notify the appropriate agency.

In accordance with California Health and Safety Code Section 7050.5, no further disturbance will occur until the Sacramento County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98.

If the remains are determined by the County Coroner to be Native American, the Coroner shall notify the Native American Heritage Commission (NAHC) within 24 hours. A professional archaeologist with Native American burial experience will conduct a field investigation of the specific site and consult with the Most Likely Descendant (MLD), if any, identified by NAHC. As necessary and appropriate, a professional archaeologist may provide technical assistance to the MLD, including the excavation and removal of the human remains. The MLD may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods (as provided in PRC Section 5097.98). Where the following conditions occur, the landowner or his authorized representative will rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance.

- ▲ The NAHC is unable to identify a MLD or the MLD failed to make a recommendation within 24 hours after being notified by the commission.
- ▲ The descendant identified fails to make a recommendation.
- ▲ The landowner or his authorized representative rejects the recommendation of the descendant, and the mediation by the NAHC.

Significance after Mitigation

Implementation of Mitigation Measure 3.5-3 would reduce significant impacts to a **less-than-significant** level by requiring work to stop if suspected human remains are found, communication with the county coroner, and the proper identification and treatment of the remains consistent with the California Health and Safety Code and the California Native American Historical, Cultural, and Sacred Sites Act.

Hazards and Hazardous Materials

Mitigation Measure 3.8-1: Remediate recognized environmental conditions in accordance with applicable regulations

CADA shall coordinate with all appropriate federal, State, and local agencies regarding the potential need for remediation at the site and methods to address asbestos-containing building materials, lead-based paint, universal waste, and materials with black mold during demolition of the existing DGS warehouse. Agencies that may have jurisdiction over hazardous-materials concerns could include the Sacramento County Environmental Management Department (EMD), Central Valley RWQCB, DTSC, EPA, and California Division of Occupational Safety and Health. Remediation of contaminated soil (if determined to be needed) and methods for containment/removal of RECs shall follow all regulatory standards. All contaminated soil and RECs shall be removed from the project site in a manner consistent with applicable regulations and shall be disposed of at an off-site disposal facility authorized to accept the particular type of contaminated materials.

In addition, the County EMD shall be notified if evidence of previously undiscovered soil or groundwater contamination (e.g., stained soil, odorous groundwater) is encountered during construction activities. Any contaminated areas shall be remediated in accordance with requirements identified by the County EMD, Central Valley RWQCB, DTSC, or other appropriate federal, State, or local regulatory agencies.

Significance after Mitigation

Compliance with these regulations would prevent construction of the parking structure from resulting in a significant risk to construction workers or the public from exposure to hazardous materials currently present on the project site. Therefore, Mitigation Measure 3.8-1 would reduce this impact to a **less-than-significant** level.

Mitigation Measure 3.8-2: Prepare and implement a construction traffic control plan

CADA shall 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 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 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 traffic control plan shall also provide information on access for emergency vehicles to prevent interference with emergency response.

Significance after Mitigation

Preparation of the required traffic control plan and compliance with the plan, as required by Mitigation Measure 3.8-2, would minimize construction impacts related to interference with emergency response or evacuation to a **less-than-significant** level.

Hydrology and Water Quality**Mitigation Measure 3.9-1: Prepare and implement a stormwater pollution prevention plan**

Prior to construction, CADA shall obtain coverage under the NPDES General Permit. In compliance with the General Permit, a stormwater pollution prevention plan (SWPPP) shall be prepared detailing measures to control soil erosion and waste discharges from project construction areas. All contractors conducting construction-related work will be required to implement the SWPPP to control soil erosion and waste discharges. The general contractor(s) and subcontractor(s) conducting the work will be responsible for implementing all best management practices (BMPs) detailed in the SWPPP.

The SWPPP shall 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) will be required to be implemented for all construction activities that expose soil. Fill and grading materials brought in from offsite shall be clean, chemically inert, and handled with appropriate containment to prevent contamination of stormwater. Grading operations will 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 shall contain specific measures for stabilizing soils before the onset of the winter rainfall season. Implementation of these standard erosion-control measures will reduce the potential for soil erosion and sedimentation of stormwater runoff during construction.

If dewatering is required, the SWPPP shall include a dewatering plan, which will establish measures to treat groundwater pumped from the construction site prior to 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.

In addition to the protections provided by coverage under the General Permit, the City's Stormwater Management and Discharge Control Ordinance requires projects to minimize or eliminate sediment and pollutants in construction site stormwater discharges. CADA shall prepare an erosion, sediment, and pollution-control plan, or its equivalent, for construction and post-construction activities and shall comply with all applicable regulations and industry-standard practices for protection of surface water and groundwater quality.

Significance after Mitigation

CADA would comply with the laws and regulations in Mitigation Measure 3.9-1 designed to be protective of water quality. Therefore, the release of soil or other contaminant materials into waterbodies during construction would be avoided or minimized and impacts to surface and groundwater quality resulting from project construction would be reduced to a **less-than-significant** level.

Noise

Mitigation Measure 4.8-1a: Implement measures to reduce ground vibration

To reduce ground vibration and noise impacts from construction activities, CADA shall require the construction contractor to implement the following measures:

- ▲ To the extent feasible, earthmoving and ground-impacting operations shall be phased so as not to occur simultaneously in areas close to sensitive receptors. The total vibration level produced could be substantially less if multiple vibration sources are not operated at the same location at the same time.
- ▲ Where there is flexibility in the location of use of impact equipment such as pile drivers (if they are used), the equipment shall be operated as far away from vibration-sensitive sites as reasonably possible.
- ▲ Alternatives to traditional pile driving (e.g., sonic pile driving, jetting, cast-in-place or auger cast piles, non-displacement piles, pile cushioning, torque or hydraulic piles) shall be considered and implemented where feasible to reduce vibration levels.

Mitigation Measure 4.8-1b: Develop and implement a vibration control plan

CADA shall require the construction contractor to implement the following measures if pile driving is selected as a construction method:

- ▲ Pile driving shall be limited to the daytime hours 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. Pile driving shall not be conducted outside of those hours.
- ▲ A vibration control plan shall be developed by the design-build team to be submitted to and approved by CADA prior to initiating any pile driving. Applicable elements of the plan will be implemented before, during, and after pile driving activity. The plan shall consider all potential vibration-inducing activities that would occur and require implementation of sufficient measures to ensure that nearby sensitive receptors are not exposed to vibration levels in excess of applicable thresholds. Items that shall be addressed in the plan include the following:
 - Conduct a pre-construction survey to identify any pre-existing structural damage to nearby buildings that may be affected by project generated vibration. Identify building type and integrity of existing structures that could potentially be damaged during vibration activities
 - Based on the pre-construction survey, establish the maximum allowable vibration levels that each existing building could be exposed to. If limits cannot be established then Caltrans recommended standards with respect to the prevention of architectural building damage; 0.2 in/sec PPV for normal dwelling houses, 0.1 in/sec PPV for normal buildings shall be used. Upon identification of buildings

that are occupied at the time of pile driving, FTA's maximum-acceptable-vibration standard with respect to human response, 80 VdB, shall also not be exceeded.

- Identification of minimum setback requirements for different types of ground vibration-producing activities (e.g., pile driving) for the purpose of preventing damage to nearby structures and preventing negative human response shall be established based on the proposed construction activities and locations and the maximum allowable vibration levels identified above. Factors to be considered include the specific nature of the vibration producing activity, local soil conditions, and the fragility/resiliency of the nearby structures. Initial setback requirements can be breached if a project-specific, site specific analysis is conducted by a qualified geotechnical engineer or ground vibration specialist that indicates that no structural damage would occur at nearby buildings or structures.
- All pile driving generated vibration levels shall be monitored and documented at the nearest sensitive land use to ensure that applicable thresholds are not exceeded. Recorded data will be submitted on regular basis to the City. If it is found at any time by the construction contractor or CADA that thresholds are exceeded, pile driving will cease in that location and methods will be implemented to reduce vibration to below applicable thresholds, or an alternative pile installation method will be used at that location, such as cast-in-place or auger cast piles.

Significance after Mitigation

Implementation of Mitigation Measures 4.8-1a and 4.8-1b would ensure that pile driving would not occur during the more sensitive times of the day (i.e., late evening through early morning). Additionally, the mitigation measures would require CADA and the construction contractor to minimize vibration exposure to nearby receptors by locating equipment far from receptors as possible and by phasing operations. Further, if pile driving would be required, a vibration control plan would be prepared and implemented to refine appropriate setback distances and identify other measures to reduce vibration if necessary, and identify and implement alternative methods to pile driving if required. These measures would ensure that any ground-born vibration levels would remain below thresholds that prevent structural damage and human annoyance. If these thresholds cannot be achieved, then alternative pile installation methods must be used. Thus, this impact would be reduced to a **less-than-significant** level.

Tribal Cultural Resources

Mitigation Measure 3.17-1: Monitoring and Response Measures for Potential Unknown Prehistoric Archaeological Resources and Tribal Cultural Resources

This mitigation measure expands on the actions included in Mitigation Measures 3.5-1 and 3.5-2 to also address encountering unknown prehistoric cultural resources and tribal cultural resources. This mitigation measure reflects input provided by UAIC and Wilton Rancheria on two recent State office building environmental impact reports in downtown Sacramento. Where ground disturbing activities occur in native soils, or there is no evidence of extensive past ground disturbances, or evidence suggests that imported soils have a high probability of containing artifacts and materials of importance to tribal entities, a Native American monitor and a qualified archaeologist meeting the United States Secretary of Interior guidelines for professional archaeologists will monitor ground-disturbing activities. The determination for initiating or ending monitoring disturbance of imported soils will be made based on coordination between the qualified archeologist and Native American monitor considering factors such as the source of the imported soil and whether any signs of potential artifacts had been observed, with a final determination made by CADA. The Native American monitor will be provided the opportunity to conduct a site meeting with construction personnel to convey cultural resources awareness information. If evidence of any prehistoric subsurface archaeological features or deposits are discovered during construction-related earth-moving activities (e.g., lithic scatters, midden soils), all ground-disturbing activity in the area of the discovery shall be halted until a qualified archaeologist and Native American representative can assess the significance of the find. If after evaluation, a resource is considered significant, or is considered a tribal cultural resource, all preservation options shall be considered as required by CEQA, including possible data recovery, mapping, capping, or avoidance of the resource. If artifacts are recovered from significant prehistoric archaeological resources or

tribal cultural resources, they shall be transferred to an appropriate tribal representative, or housed at a qualified curation facility. If artifacts or other materials must be removed, preference shall be given to transferring materials to an appropriate tribal representative and re-interring the material at a location on the project site. The results of the identification, evaluation, and/or data recovery program for any unanticipated discoveries shall be presented in a professional-quality report that details all methods and findings, evaluates the nature and significance of the resources, analyzes and interprets the results, and distributes this information to the public.

Significance after Mitigation

Implementation of this mitigation measure would reduce the project's impact to a **less-than-significant** level by requiring construction monitoring and, in the case of a discovery, preservation options (including data recovery, mapping, capping, and avoidance) and proper care of significant artifacts if they are recovered, including re-interring material on the project site.

Utilities and Service Systems

Mitigation Measure 3.18-1: Pay City's combined sewer development fee

Prior to connection of the project's wastewater system to the CSS, CADA shall pay the City's Combined Sewer Development Fee as defined in Chapter 13.08 of the City Code for their wastewater contributions to the CSS. This fee is used to fund an appropriate share of the capital costs of the CSS facilities needed to accommodate new development in the CSS area.

Significance after Mitigation

Implementation of Mitigation Measure 3.18-1 would support the appropriate share of costs of CSS facilities, which would reduce the project's contribution to the CSS or wastewater treatment capacity to a **less-than-significant** level.

Pursuant to Section 21082.1 of the California Environmental Quality Act, CADA has independently reviewed and analyzed the Initial Study and Mitigated Negative Declaration for the project and finds that the Initial Study and Mitigated Negative Declaration reflects the independent judgment of CADA. The Lead Agency further finds that the project mitigation measures shall be implemented as stated in the Mitigated Negative Declaration.

I hereby approve this project:

Name/ Title

Capitol Area Development Authority

(to be signed upon approval of the project after the public review period is complete)