

U.S. Department of Housing and Urban Development

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# **Environmental Assessment Determinations and Compliance Findings for HUD-assisted Projects** 24 CFR Part 58

# **Project Information**

Project Name: Mather Veterans Village Phase 4 Project

Responsible Entity: City of Rancho Cordova

**Grant Recipient** (if different than Responsible Entity):

State/Local Identifier: The project is located at the southeast corner of Schirra Avenue and Bleckely

Street in the City of Rancho Cordova (City), Sacramento County (APN: 067-0010-093).

Preparer: Mercy Housing California

Certifying Officer Name and Title:

Micah Runner, City Manager

Grant Recipient (if different than Responsible Entity): Mercy Housing California

Consultant (if applicable): NCE, Contact: Gail M. Ervin, PhD

# **Direct Comments to:**

Kristian Mizes-Tan, Project Manager Mercy Housing California 2512 River Plaza Drive Suite 200 Sacramento, CA 95833 Kristian.Mizes-Tan@mercyhousing.org

#### **Project Location:**

The project is located at the southeast corner of Shirra Avenue and Bleckley Street in the City of Rancho Cordova (City), Sacramento County (APN: 067-0010-093), within the former Mather Air Force Base area. See Figures 1 and 2 at the end of this document.

# Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

The proposed project would construct a total of 70 units comprised of 58 one-bedroom units and 12 two-bedroom units. One unit would be reserved for the onsite manager, and 69 units would provide permanent supportive housing VASH-supported units for senior veterans aged 55+ experiencing homelessness. All units would include closets in the bedrooms, central air conditioning and heating, and kitchens equipped with a refrigerator, stove and hood, sink, cabinets, dishwasher, and garbage disposal. Communal laundry facilities are centrally located within the residential building. Landscaping would feature drought tolerant plants and emphasize tree-shading of open space areas. Mechanical equipment and HVAC units will be screened with either planting or fencing.

The proposed project is on the former Mather Air Force Base directly south of the existing Mather Veterans Village Phase 1 and 3. The project would be constructed complimentary to the existing Phases 1 and 3 design directly across Shirra Ave. This includes constructing a 3,500 square foot community building which will house staff office spaces, a community kitchen and a large multipurpose space. Outdoor amenities would feature a large open courtyard and shared patio. The main entrance would be along Shirra Avenue through a drive gate. The project would provide 45 uncovered parking spaces including ADA and electrical charging stations. In addition, 18 bicycle parking spots will be provided.

The project would be graded and constructed in a single phase and would take approximately 18 months to complete. The project would have an approximate depth of excavation of 5-8 feet.

#### **Construction Schedule**

04/2025 - Site prep, grading, underground utilities

06/2025 - Foundations & underground mechanical, electric, plumbing

07/2025 - Slab on grade complete

11/2025 - Exterior framing complete

02/2026 - Roofing, doors, windows

03/2026 — Interior Framing, Rough Mechanical, Electrical, Plumbing & Fire

05/2026 - Drywall, painting

06/2026 - Grading, trenching and footings for parking lot, sidewalks, site lighting, shade structures and irrigation.

08/2026 — Finished Paving and Sidewalks

09/2026 — Finished Landscaping, site lighting and irrigation

09/2026 — Building Finishes, interior casework

10/2026 — Certificate of Occupancy

The proposed project would be financed by City/County ARPA (American Rescue Plan Act) funding (reserved), federal Community Project Funding (CPF), 69 project-based VASH vouchers (committed from SHRA in 2023), and 9% tax credits (applied for in July 2024).

Nations Finest (formerly Veterans Resource Center, service partner on the first two phases) would be the service provider enhancing the VA case management services. Mercy Housing California will be the lead developer, Managing General Partner, Asset Manager, and the affiliate Mercy Housing Management Group will provide property management services.

The City of Rancho Cordova has been designated the Responsible Entity as agreed upon by SHRA (SHRA, Email Communication October 16, 2024).

# Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:

According to the Department of Housing and Urban Development (HUD), in 2023 there was approximately 10,589 homeless veterans in the streets of California (HUD 2023). In 2024 Sacramento County had an estimated amount of 600 homeless veterans, 60% of whom are sleeping outdoors or in vehicles (Sacramento Steps Forward, 2024). The purpose of the proposed project is to provide an extension to the existing Mather Veterans Village north of the site. In addition, the project would provide permanent supportive housing for homeless and disabled Veterans near existing Veterans' services such as the Mather Veterans Administration hospital and the existing Mather Veterans Village. Transitional and permanent supportive housing projects offer a safe environment where Veterans are supported in their efforts to overcome a variety of obstacles. By providing an effective network of services, Veterans are connected to employment and training programs, counseling, and legal services.

The project also helps meet the County's projected "fair share" requirement to provide housing for all sectors of the community, and is consistent with the County's adopted goals, policies, and actions designed to meet the housing needs for low-income families and individuals.

In addition, the Sacramento Area Council of Government's Regional Plan, as well as the State of California, recognize infill housing as needed to reduce vehicle miles traveled and the regional impact of development on air quality and climate change.

# Existing Conditions and Trends [24 CFR 58.40(a)]:

The project site is approximately 1.85 acres of weedy vegetation on a vacant lot at the southeast corner of Schirra Avenue and Bleckley Street. The site is relatively flat with a gentle downward slope from the north to the south. The site is surrounded by an apartment complex and the Volunteers of America Veterans Service Center to the north and east, a Vitalent Lab to the west and the Western Electrical Contractors Association to the south.

The area has good regional linkage via Highway 50, and Sacramento Regional Transit (SacRT) provides public transportation. Bus stops for RT line 75 is located approximately 315 feet north of the site, which provide access to major medical centers and other shopping in the vicinity at less than 30-minute intervals.

Housing costs within the County of Sacramento (County) hit an all-time high in 2020 and have continued to increase in price. Like home values, rental costs have also increased significantly within the County. As noted above, the average monthly rent of \$1,676 is not affordable to extremely low-, very low-, and low-income households. The current standard of housing affordability indicates that households spending 30% or more of their gross income on housing are "cost burdened." The impact of high housing costs disproportionately affects extremely low-, very low-, and low-income households (Sacramento County 2023) and this trend is anticipated to continue. On June 11, 2024, the Sacramento County Board of Supervisors approved the transfer of 2.2 acres of land and \$3M in American Rescue Plan Act (APRA) funding to the City of Rancho Cordova for the development of Mather Veterans Village Phase 4, located on the former Mather Air Force Base. The Mather Veterans Village Phase 4 project aligns with ongoing efforts to expand access to housing and supportive services within the County.

# **Funding Information**

Grant Number	HUD Program	Funding Amount
B-24-CP-CA-0100	Community Project Funding (CPF)	\$1,000,000
	69 project-based VASH vouchers	\$20,950,195 (over 20 years)

#### **Estimated Total HUD Funded Amount:**

\$21,950,195

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:

\$43,879,875

# Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citation, dates/names/titles of contacts, and page references. Attach additional

documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORD	ERS, AND R	EGULATIONS LISTED AT 24 CFR 50.4 and 58.6
Airport Hazards	Yes No	The proposed project is located approximately 2100 feet away from the closest civilian airport (Mather
24 CFR Part 51 Subpart D		Airport). The Airport Safety zones have been updated for the airport. The new Airport Safety zone classifications contain more zones than what is identified in the DOD guidelines. While reviewing the DOD guidelines, the City has determined that County Safety Zone 1 and 2 is equivalent to the Accidental Potential Zone under the DOD guidelines. Therefore, under the County's new guidelines Safety Zone 3, 4, 5 and 6 fall under the overflight zone in the DOD guidelines. The site is within Safety Zone 3 and therefore is not within a Runway Potential Zone/Clear Zone (RPZ/CZ) or Accident Potential Zone (APZ).
Coastal Barrier Resources	Yes No	The proposed project is located 83.3 miles inland and
Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]		is not within a coastal zone. California does not contain protected coastal barrier resources.  Exhibit 2-B

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Flood Insurance Flood Disaster Protection Act of 1973 and National Flood	Yes	No	The project is located within Zone X Area of Minimal Flood Hazard, per FEMA panel 06067C0208H effective 8/16/2012. No flood insurance is required.
Insurance Reform Act of 1994			effective 8/10/2012. No flood insurance is required.
[42 USC 4001-4128 and 42 USC 5154a]			Exhibit 2-C
STATUTES, EXECUTIVE ORD	ERS, A	AND R	EGULATIONS LISTED AT 24 CFR 50.4 & 58.5
Clean Air	Yes	No	The project lies within the Sacramento Metropolitan
Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93		19	Air Quality Management District. This area is designated non-attainment for the federal ozone and particulate (PM10 and PM2.5) standards. Since this project is new construction, air district requirements apply.
			The project is required to comply with Basic Emission Control Practices (BMPs) as shown in the SMAQMD guidance (Exhibit 2-D). Additionally, some of the greenhouse gas construction BMPs recommended by the air district apply. The project will comply with all SMAQMD regulations, and no additional MMs are required. Some recommendations, such as water use planning for dust control, achieve a variety of goals simultaneously (e.g., reducing PM2.5 emission while conserving water).
			Construction and Operational Emissions
			CalEEMod is an air pollution model that estimates emissions based on specific project characteristics. A model run was developed for this project and appropriate mitigations selected, including those provided by the developer (stated in the project description, included here by reference). A CalEEMod model run summary is included in Exhibit 2-D.
			Inputs to the model included the construction year, total expected duration, proposed equipment usage, and land use, which is considered 'apartments lowrise.' Other model inputs included factors such as building area, landscape area, and lot acreage. The project schedule and equipment usage assumptions assumed construction takes one and a half years (dates from developer). Average daily emissions were computed by dividing the total construction emissions by the number of workdays. Based on the CalEEMod results with the required SMAQMD BMPs, the project's emissions fall well below thresholds of significance for construction and operational emissions no further mitigation measures are needed. The summary results of the CalEEM emissions model are included in Exhibit 2-D.

			Exhibit 2-D
Coastal Zone Management	Yes	No	The proposed project is located 83.3 miles inland from the coast and is not within a coastal zone.
Coastal Zone Management Act, sections 307(c) & (d)	1		Exhibit 2-E
Contamination and Toxic Substances	Yes	No	A Phase I Environmental Site Assessment (ESA) was conducted for the site (see Exhibit 2-F[b]). The former
24 CFR Part 50.3(i) & 58.5(i)(2)			Mather AFB is a Superfund site with on-going long-term cleanup. Per the United States Environmental Protection Agency (EPA) Superfund Site website for the Mather AFB, "all potential exposure to contaminated soils and groundwater has been eliminated at Mather AFB, SVE will continue to operate at several areas with residual soil contamination until cleanup levels are achieved. Groundwater pumping and treatment systems will continue to operate until all groundwater cleanup levels are achieved. Vapor intrusion at the site remains a concern for human health and the Air Force has not adequately characterized these concerns."  The Phase I identified three recognized environmental conditions (RECs) associated with the site: 1. Former Mather Air Force Base Groundwater Contamination; 2. Aerojet Rocketdyne Inc. Groundwater Contamination; and 3. Former hazardous materials/waste on subject property in former photo lab on the southwest portion of the Site. Due to the RECs and RECs in vicinity of the site, the Phase I recommended an additional investigation including soil vapor concerns be considered for the site.  A Limited Phase II ESA was conducted to determine the presence or absence of contaminants within the
			the presence or absence of contaminants within the soil on the site. Soil samples were analyzed for lead, silver, asbestos, Volatile Organic Compounds (VOCs), and Per-and polyfluoroalkyl substances (PFAS). Lead was detected in all soil samples and was determined that all concentrations were lower than the Department of Toxic Substance Control (DTSC) threshold screening levels of 80 milligrams per kilogram (mg/kg) for residential soil. There was one sample with a concentration of 10 times the threshold at a depth of 0.5 ft bgs. To mitigate the exposure to lead, if this soil is to be excavated and disposed offsite, additional laboratory analysis is needed to determine whether this is California (non-RCRA1) hazardous waste. Silver was detected in one soil sample collected. The detected concentration of 0.23 mg/kg was lower than the San Francisco Bay RWQCB ESL of 390 mg/kg for soil direct exposure human health

risk screening. No VOCs or asbestos were detected in any of the soil samples collected. PFAS compounds perfluorooctanesulfonic acid (PFOS) and perfluorohexanesulfonic acid (PFHxS) were detected. PFOS was detected in three soil samples with concentrations ranging from an estimated value of 0.19 microgram per kilogram (μg/kg) to 0.99 μg/kg. The PFOS concentrations are lower than the EPA Regional Screening Level (RSL) (May 2024) of 6.3 ug/kg for residential soil. PFHxS was detected from one sample at an estimated concentration of 0.23 μg/kg, lower than the EPA RSL of 1300 μg/kg for residential soil. The Soil Vapor Sampling results showed VOCs in all of the soil vapor samples collected. The concentrations were compared to the San Francisco Bay RWQCB ESLs (2019, Rev 2) for soil gas vapor intrusion human health risk screening. Trichloroethylene (TCE) detections are likely related to the RECs related to groundwater contamination beneath the Site. Benzene and chloroform, along with the other BTEX [benzene, toluene, ethylbenzene, and xylenes] compounds detected at concentrations lower than screening levels, are likely related to the UST sites nearby. Since three compounds were detected in soil vapor samples at concentrations exceeding their corresponding residential screening levels for vapor intrusion pathway, it is recommended that vapor mitigation, such as the use of a vapor barrier, is considered for new construction at the Site. Pre-occupancy indoor air sampling has been required to verify the effectiveness of vapor mitigation measures. In addition, to comply with HUD's Policy on Radon, the developer must conduct post-construction radon testing within the building followed by mitigation if needed (mitigation required if level is above 4 pCi/L or more). Exhibit 2-F and 2-F(b) **Endangered Species** A review of special status species databases including Yes No the California Natural Diversity Database, United  $\times$ Endangered Species Act of 1973, States Fish and Wildlife Service Information for particularly section 7; 50 CFR Planning and Conservation Database, and the Part 402 California Native Plant Society's Inventory of Rare and Endangered Plants of California was completed in order to identify special status species that may occur within the project area. No federally listed species were observed during the site visit on June 6, 2024. Historically, the site was previously developed on and used as part of the military base before 2006. In

		addition, to keep weedy vegetation growth down; the site is mowed bi-annually.
		The site is an infill lot that is vacant with weedy vegetation surrounded by development.
		Based on the results of this review, and the site visit, no habitat for special status species is present within or adjacent to the project area.
		Exhibit 2-G
Explosive and Flammable Hazards	Yes No	Aerial photography and the California Environmental Protection Agency (CalEPA) Regulated Site Portal was used to determine if there were facilities with
24 CFR Part 51 Subpart C		aboveground storage tanks (ASTs) within a 1-mile radius of the site. Three sites containing ASTs were identified within a 1-mile radius of the site. The first facility is Vitalant Mather that is listed with 2 ASTs: a 1,200-gallon tank containing liquid nitrogen and a 3,000-gallon tank containing Diesel surrounded by a concrete wall. The Acceptable Distance Calculator determined that the acceptable distance for Thermal Radiation for People is 437 ft and the acceptable distance for Thermal Radiation for a building is 84 ft. from these tanks. The project is approximately 225 feet east of the tanks. The Sacramento Metropolitan Fire District was consulted to determine if the adjacent tanks would have an effect on the proposed project based on current intervening structures. Matt Rieger, Fire Inspector II for the District concluded that the separation distance exceeds what would be required for thermal radiation; therefore, the tanks at this facility would not pose a threat to the project.
		The second facility is the VA Medical Center Mather that is listed containing multiple tanks. The largest sized tank is 15,000 gallons containing diesel. The Acceptable Distance Calculator determined that the acceptable distance for Thermal Radiation for People is 854 ft and the acceptable distance for Thermal Radiation for a building is 175 ft. The project is approximately 1,300 feet southeast of the tanks; therefore, the tanks at this facility would not pose a threat to the project.
		The third facility is the Sacramento Army Aviation Support Facility that is listed containing multiple tanks. The largest sized tank is 60,000 gallons containing Jet fuel (JP-8). The Acceptable Distance Calculator determined that the acceptable distance for Thermal Radiation for People is 1,522 ft and the acceptable distance for Thermal Radiation for a building is 333 ft. The project is approximately 1,613

Farmlands Protection  Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes No	feet south of the tanks; therefore, the tanks at this facility would not pose a threat to the project.  Exhibit 2-H  The proposed project site is in a vacant infill lot surrounded by commercials and residential facilities.  According to the California Department of Conservation Division of Land Resource Protection Farmland Mapping and Monitoring Program, the site does not meet the definition of prime or unique farmlands and is not of statewide or local significance. The site is listed as urban built up and there are no prime or unique farmlands within a 1-mile vicinity of the site. Therefore, the project would have no effect on farmland.
Floodplain Management  Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes No	Exhibit 2-I  No HUD-approved CISA maps were available for the project site. Therefore, FEMA maps were used to determine the floodplain in the area. Based on FEMA map, the project is located within Zone X Area of Minimal Flood Hazard, per FEMA panel 06067C0208H effective 8/16/2012. The project lies outside of the 500-year floodplain; therefore, no further compliance is needed.  Exhibit 2-J
Historic Preservation  National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes No	A records search of the project area and a 100-meter buffer was requested from the North Central Information Center. The records search indicated one resource, a historic mining district, within the project area; no resources have been recorded in the 100-meter buffer.  Within the surrounding vicinity of the vacant project site is Mather Village. Mather Village was constructed as an element of the former Mather Air Force Base, which was closed in 1993. The Base has been evaluated regarding its historic/architectural significance. "Responding to a 1980 Air Force recommendation regarding temporary World War II buildings, the State Historic Preservation Officer concurred that these structures on Mather AFB lacked integrity and therefore were not eligible for listing on the National Register." The concurrence was reaffirmed in the 1993 Section 106 consultation for the Mather Disposal and Reuse EIS. Thus, the adjacent buildings are not considered eligible to the National Register of Historic Places. SHPO again concurred with this finding in 2012 for the nearby Mather

		Veterans Village project. Therefore, no additional architectural review was conducted.  Native American correspondence was initiated by NCE with a letter and attached maps to the Native American Heritage Commission (NAHC) on May 31, 2024. The letter requested a record search of their Sacred Lands File (SLF) and a contact list for regional tribes that may have knowledge of cultural or tribal resources within or immediately adjacent to the project area. The SLF results were positive. Inquiry letters were emailed and mailed to the tribes identified by the NAHC on June 12, 2024, on Rancho Cordova letterhead. The United Auburn Indian Community of the Auburn Rancheria (UAIC) would like their mitigation measures on file for use in Section 106 projects, which are incorporated as project avoidance measures. Follow up emails were sent June 24, 2024. No response has been received to date.  The City has determined that the proposed undertaking would have no effect on a historic resource. Per 36 CFR Part 800.3(c)(4) Failure of the SHPO/THPO to
		respond, SHPO concurs with the determination of no adverse effect on a historic resource.  Exhibit 2-I
Noise Abatement and Control  Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	Yes No	
Sole Source Aquifers  Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	Yes No	According to the Environmental Protection Agency (EPA) Sole Source Aquifer (SSA) interactive online map, the project location does not lie above a sole source aquifer. Therefore, the Safe Drinking Water Act does not apply.
Wetlands Protection	Yes No	According to the National Wetlands Inventory (NWI) interactive online map, the proposed project location not located on a wetland identified by the U.S. Fish

Executive Order 11990, particularly sections 2 and 5		and Wildlife Services. There are no wetlands identified on or adjacent to the proposed project site.  Exhibit 2-N
Wild and Scenic Rivers  Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes No	The proposed project site is in a vacant infill lot surrounded by commercials and residential facilities. The closest listed wild and scenic river near the project area is the American River approximately 2.2 miles to the northwest. The area between the American River and the project site is developed with residential and commercial facilities.  Exhibit 2-O
		Exilibit 2-0
ENVIRONMENTAL JUSTICE Environmental Justice		
Executive Order 12898	Yes No	The US EPA EJScreen is an on-line tool that evaluates a wide range of environmental and social factors. Environmental factors focus on air pollution, underground tanks and hazardous material sites, and building concerns such as lead paint. Social factors include income, skin color, language, education, and age (very young and seniors). The purpose of the tool is to identify communities that are subjected to high levels of pollution and prevent or mitigate development that may worsen health or economic outcomes.  The project is located between the Mather Airport and US Highway 50. This is primarily an area of government buildings and small businesses. Nearby major local streets/highways include Mather Boulevard and International Drive. Mather Airport is located approximately 2,100 feet south. The airport supports general aviation, US Air Force, and fire attack airplanes and helicopters, but it primarily
×	c	functions as an air cargo center. These are all local sources of air pollution such as PM2.5.  Three EJScreen model runs were performed to estimate if the project would disproportionally impact vulnerable populations at this location compared to sites farther away. Reports for these model runs are included below.
a a	,	EJScreen model runs are typically performed for the project site and then at increasing distances in concentric circles. This allows for comparison between the project site and nearby areas. The model was updated to V2.1 in October 2022 to enhance capabilities in some US Territories and expand EJ metrics. The model now considers five factors (two previously) to calculate a "Demographic Index." The factors considered are percent low-income, percent

limited English-speaking, percent less than high school education, percent unemployed, and low life expectancy. (Source:

https://www.epa.gov/newsreleases/epa-launches-updates-environmental-justice-mapping-tool-ejscreen)

The Demographic Index is calculated for a circle with the Project as the center point. The values are expressed as a percentile of the state average for each distance is as follows:

- 0.25 miles, with a population of about 414 people, the Demographic Index is 61,
- 0.5 miles, with a population of about 1,114, the Demographic Index is 59, and
- 1 mile, with a population of about 9,760, the Demographic Index is 48.

The roughly 20% difference between the one-mile circle and the other circles is caused by the greater number of people residing within one mile radius. As one moves farther from the project a bigger group of people is captured, giving a more robust sample size. There is no statistical difference between the Demographic Index scores for one-quarter and one-half. At one-mile, the larger number of people reduces the relative index factor. Put another way, people with low-income, limited English-speaking ability, less than high school education, unemployed, and low life expectancy are more concentrated near the project, but not beyond a 20% difference than the larger one-mile cohort.

EPA recommends considering pollution scores for various metrics that are at or above the 80th state percentile. The entire area shows high scores for Air Cancer Risk, Respiratory Hazard Index and Superfund Site Proximity. There is a small difference between the one-quarter mile study circle and the surrounding areas for the following metrics.

Essentially, the population of the entire area is exposed to high risk from air toxics cancer, and respiratory hazards.

The high cancer and respiratory hazard index scores are from proximity to major emission sources. These sources include heavy vehicle traffic on the major roads and highways in the immediate area, with intermittent air traffic at Mather Airport a lesser contributor. For instance, using the most recent Caltrans data (2017) for Interstate 50, average daily

traffic for both directions was 132,400. Vehicles on other local roads contribute to emissions as well.

Traffic volumes have probably increased since the 2017 counts, generally about 1% per year. The typical highway mix includes about 5% heavy diesel trucks (MTC 2016). Diesel particulate matter is a known carcinogen with no acceptable exposure level. I-50 is a major haul route for heavy trucks in both directions. Likewise, Mather Boulevard and the International Drive carry high daily traffic volumes.

Because EJScreen shows high levels of PM2.5 and diesel particulate matter, it is recommended enhanced air filtration be provided for the project HVAC systems. Enhanced HEPA filtration can provide 60% to 90% improved indoor air quality. People typically spend about 21.6 hours per day indoors (EPA 2024), and enhanced air filtration will provide residents a substantial long-term health benefit. EPA defines enhanced air filtration as using MERV 13 or higher filters and changing them regularly. This is considered a cost-effective strategy and may help avoid asthma and other respiratory problems as well.

As discussed in other sections of this EA, other site factors such as noise and hazards either do not exceed safe thresholds or can be mitigated for residential uses.

Exhibit 2-P

Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. All conditions, attenuation or mitigation measures have been clearly identified.

Impact Codes: Use an impact code from the following list to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

Environmental Assessment Factor	Impact Code	Impact Evaluation
LAND DEVELOP	*	Ampure 2 tarawall
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The proposed project is zoned as Special Planning Area/Mather Field Special Planning Area under the General Plan. The proposed project for the construction of veterans housing is consistent with the General Plan designation and the zoning and is compatible with the first three phases of Mather Veterans Village.  Ref 2
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	The topography is relatively flat throughout the site. The project construction must comply with the City's erosion and sediment control ordinance and storm water management and discharge control ordinance per the City of Rancho Cordova Zoning Ordinance.  Refs 2 and 5
Hazards and Nuisances including Site Safety and Noise	3	Three compounds were detected in soil vapor samples at concentrations exceeding their corresponding residential screening levels for vapor intrusion pathway, thus vapor barrier mitigation is required for new construction at the Site. Pre-occupancy indoor air sampling shall be provided to verify the effectiveness of vapor mitigation measures. In addition, to comply with HUD's Policy or Radon the developer must conduct post-construction radon testing within the building followed by mitigation if needed (mitigation required if level is above 4 pCi/L or more).  The average day/night sound levels are 59 dBA, which falls into the acceptable range, according to HUD Noise Standards. Therefore, the proposed project is predicted to meet the HUD exterior and interior noise level standards with no additional noise control measures required.
	Y 40 14	Exhibits 2-F and 2-I
Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOM	CORP. CO.	
Employment and Income Patterns	1	The project will generate temporary construction jobs during construction of the project, and a permanent full-time manager will be hired on the site.  Ref
Demographic Character Changes, Displacement	2	The project will provide permanent supportive housing VASH-supported units for senior veterans aged 55+ experiencing homelessness. This use is consistent with the land use designations and the first three phases of Mather Veterans Village. The site is vacant and surrounded by commercial and residential facilities; therefore, no families, individuals or businesses will be displaced during construction.

Environmental Justice	3	Because EJScreen shows high levels of PM2.5 and diesel particulate matter, enhanced air filtration for the project HVAC systems is being required as mitigation. Enhanced HEPA filtration can provide 60% to 90% improved indoor air quality. People typically spend about 22.5 hours per day indoors, and enhanced air filtration will provide residents a substantial long-term health benefit. EPA defines enhanced air filtration as using MERV 13 or higher filters and changing them regularly.
e es	(4))	Exhibit 2-P

Environmental	Impact	Invest Production
Assessment Factor	CILITIE	Impact Evaluation
COMMUNITY FA		S AND SERVICES
Educational and Cultural Facilities	2	The project is designed to serve both male and female 55+ senior homeless to low-income veterans, and no children are anticipated. The Folsom Cordova Unified School District serves the project site; Cordova Villa Elementary School, Mills Middle School, and Cordova High School serve the site. The district ensures adequate school capacity to serve all children through development impact fees.  Refs 2 and 3
Commercial Facilities	2	Within the vicinity of the project there are commercial offices. There is a Sprouts Farmers Marker approximately 1.2 miles east of the site and there are restaurants and additional grocery stores approximately 3.0 miles west of the site. Additional commercial facilities are accessible through public transit.  Ref 1
Health Consend Cosial	1	
Health Care and Social Services	1	The Sacramento VA Medical Center is located 0.3 miles north of the site and is a full-service medical center, which is a key benefit to locating Mather Veterans Village in this location. In addition, the project would provide social services for residents on site.  Ref 1
Solid Waste Disposal / Recycling	2	Project construction would generate construction waste and removal of debris. The City would manage mixed waste generated by the proposed residential uses. Construction waste would be disposed of at the Sacramento County Landfill facility on Kiefer Road, which is the primary municipal solid waste disposal facility in Sacramento County. Residential waste will be collected by Republic Services Inc. The landfill has a capacity for more than 117 million cubic yards and is divided until 11 modules. In 2017, the landfill was expected to have capacity until the year 2067.
		Refs 2, 5, and 10
Waste Water / Sanitary Sewers	2	Sacramento Regional County Sanitation District (SRCSD) and the County Sanitation District No. 1 (CSD-1) provides Sanitary

		sewer service to the area. SRCSD is responsible for the interceptor collection and treatment of wastewater (10 million gallons a day) and CSD-1 is responsible for local collection facilities (1 to 10 million gallons a day). The SRCSD has determined it has enough long-term capacity for general plan buildout within the region due to increased water conservation efficiencies and requirements, and a continuing reduction in per capita wastewater demand.  Refs 2 and 5
Water Supply	2	The area currently obtains water service from the Sacramento County Water Agency (SCWA). The 2020 Urban Water Management plan has determined that the existing system is adequality sized to serve the buildout of the general plan with additional capacity provided as warranted.
Public Safety Police	2	Refs 2, 4 and 5
Public Safety - Police, Fire and Emergency Medical	2	Police: The Rancho Cordova Police Department would provide police protection services to the project site. The Rancho Cordova Police Department is located approximately 2.9 miles northwest of the site. Project construction and occupancy of 70 residential units on a vacant parcel would have a negligible effect on current service demand and is anticipated in planned residential growth.  Fire:
×		Sacramento Metropolitan Fire Department. The closest station to the project site is Fire Station 66, located approximately 2.6 miles east of the project site. Project construction and occupancy of 70 residential units on a vacant parcel would have a minor effect on current service demand and is anticipated in planned residential growth.  Emergency Medical Services:
		Sacramento Metropolitan Fire District. All SFD Engine and Truck Companies are utilized as EMS first responders and staffed with Firefighter-EMTs and/or Firefighter-Paramedics. Project construction and occupancy of 70 residential units on a vacant parcel would have a minor effect on current service demand and is anticipated in planned residential growth.  Refs 2 and 5
Parks, Open Space and	2	
Recreation	2	The Mather Sports Center is approximately 0.8 miles northwest of the site. The Stone Creek Community Park is approximately 1.3 miles east of the site. Although the project would increase residential uses that may increase demand for services, the increase would be minor and can be accommodated at the existing parks. The project would have an open courtyard and a community building for residents to use.  Refs 1 and 2

Transportation and Accessibility	SacRT provides services in the vicinity of the project area via Bus Route 78 approximately 315 feet north of the site, with access to Light Rail. All routes provide access to major medical centers and other commercial facilities throughout the area.
	Ref 6

Environmental Assessment Factor NATURAL FEATURE	Impact Code S	Impact Evaluation
Unique Natural Features, Water Resources	2	The site is vacant infill lot. No unique natural or water resources features were identified on the project site during site surveys.  Exhibit 2-G, 2-N
Vegetation, Wildlife	3	The site is vacant and contains no trees or vegetation. No unique vegetation or wildlife were identified on the project site during the survey. The project plans to incorporate some of the existing mature trees into the landscape plan. However, trees and shrubs in the project vicinity may provide suitable nesting habitat for migratory birds including tree-nesting raptors. Although no active nests or nesting bird behavior was observed during the June 6, 2024, survey, the results of this survey do not preclude birds from establishing active nests between the time of this survey and project construction. Preconstruction nesting bird surveys are required.  Exhibit 2-G
Other Factors	2	No other factors were analyzed.

Environmental	Impact	
Assessment Factor	Code	Impact Evaluation
CLIMATE AND ENER	RGY	
Climate Change Impacts	2	A variety of tools are available to evaluate probable future climate change impacts. The US Climate Resistance Tool Kit is a free online model developed cooperatively by a number of government agencies. The tool was used to evaluate likely future climate changes in Sacramento County. The tool looks at five key factors, with results summarized below:
*		<ul> <li>Maximum Temperature (days over 100 deg F) will approximately double within the next fifty years. This is considered relatively low by national standards.</li> </ul>
å sa		<ul> <li>Wildfire risk in the Rancho Cordova area is nil.     However, smoke from fires in the adjacent mountains may negatively impact air quality. By national standards, this risk is moderate.</li> </ul>
		<ul> <li>Drought presents a substantial risk and is considered very high by national standards.</li> </ul>

		<ul> <li>Flood risk is relatively moderate by national standards.</li> </ul>
		<ul> <li>Coastal Inundation risk is nil.</li> </ul>
		Climate risks are considered low for the site with the exception of drought. The City has sufficient water supplies in drought years and is a member of the Sacramento Area Water Forum that manages regional water supplies during dry years.
		Exhibit 2-Q
Energy Efficiency	2	The project would ensure that all exterior and interior lighting would be LED which have high energy efficiency. The project is designed to meet the California Building Energy Efficiency Standards (Energy Code), Part 6 of Title 24 that includes higher energy conservation measures than most of the country.
		Ref 2

#### Additional Studies Performed:

1. Saxelby Acoustics. 2024. Noise Study Mather Village.

Field Inspection (Date and completed by):

Field Observation conducted by Catrina Vaz, NCE, June 6, 2024. .

#### List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:

- 1. Unless otherwise noted, assessments based upon the expertise and experience of Gail M. Ervin, Ph.D., NCE.
- 2. City of Rancho Cordova. 2006. General Plan. Accessible from: <u>Planning Division Document</u> Library | City of Rancho Cordova
- 3. Folsom Cordova Unified School District. 2024. Development Impact Fees. <u>Development Impact Fees Folsom Cordova Unified School District (fcusd.org)</u>
- 4. Sacramento County Water Agency. 2021. 2020 Urban Water Management Plan. <u>SCWA 2020 UWMP Final (06.24.21).pdf (saccounty.gov)</u>
- 5. Sacramento County.1997 amended 2016. Mather Field Specific Plan. <u>Title VI 603-10 Mather Field Specific Plan (2016).pdf (saccounty.gov)</u>
- 6. Sacramento Regional Transit. 2023. Sacramento Regional Transit District (sacrt.com)
- 7. California Housing Partnership. 2023. Sacramento County 2023 Affordable Housing Needs Report. Sacramento-County Housing-Report 2023-1.pdf (sachousingalliance.org)
- Department of Housing and Urban Development. 2023. Point-in-Time (PIT) estimates of homelessness by Continuum of Care (CoC) Data. <u>PIT and HIC Data Since 2007 - HUD</u> Exchange
- 9. Sacramento Steps Forward. 2024. 2024 Point-In-Time Count. <u>2024 Point-In-Time Count Sacramento Steps Forward</u>
- Sacramento County News. 2017. Kiefer Landfill Celebrates Major Milestone. <a href="https://www.saccounty.gov/news/latest-news/Pages/Kiefer-Landfill-Celebrates-Major-Milestone.aspx">https://www.saccounty.gov/news/latest-news/Pages/Kiefer-Landfill-Celebrates-Major-Milestone.aspx</a>

#### List of Permits Obtained:

A building permit issued by the City of Rancho Cordova would be required.

# Public Outreach [24 CFR 50.23 & 58.43]:

A Finding of No Significant Impact and a Notice of Intent to Request Release of Funds (FONSI/NOIRROF) would be published in a paper of general circulation 15 days before the RROF will be submitted to HUD to allow public comment on the project. The public will have 15 days to provide comments to HUD for anyone who wishes to challenge the bases for the FONSI determination.

# Cumulative Impact Analysis [24 CFR 58.32]:

The proposed project is the construction of 70 new supportive housing for senior veterans aged 55+ experiencing homelessness in the City of Rancho Cordova. Currently, the site is vacant with weedy vegetation and dirt. The project is consistent with City zoning and general plan policies. Construction air emissions would be temporary. Construction and operational emissions would both be below SMAQMD thresholds, which SMAQMD has determined results in a less than cumulatively significant effect. The project contains standard uncovered parking lots and is within walking distance of bus services and the VA Hospital and medical center. The project is an infill location and is within the boundaries of a Metropolitan Planning Organization (Sacramento Area Council of Governments) and is consistent with plans and policies. SacRT provides a fixed route bus service and connects to Light Rail Transit and the region. Therefore, operational impacts related to traffic and air quality are cumulatively less than significant. There are no sensitive habitats on the site; thus, the project will not result in a cumulative loss of biological resources, and mitigation measures are in place to avoid cumulative loss of tribal cultural resources. The project does not displace existing uses and provides infill affordable housing within the City, thereby having no adverse effect on cumulative VMT. Therefore, the proposed project will result in no cumulatively significant effects on the human or natural environment.

#### Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]

Site identification for affordable housing has proven to be a major obstacle in providing affordable housing units for veterans. Sites zoned appropriately and at reasonable cost are extremely limited within the region. This infill site has specifically been identified for additional supportive housing services for veterans within walking distance of the existing VA Hospital.

There are no adverse effects on the human or physical environment associated with the preferred alternative, and there are benefits to the human environment by constructing supportive veterans housing in this infill location next to existing services, thus there are no alternative sites that would better meet the project purpose and need.

# No Action Alternative [24 CFR 58.40(e)]:

The No Action Alternative would leave the parcel vacant with no funding for veteran supportive housing. The No Action Alternative would fail to achieve the City's policy to provide affordable housing and would fail to provide services to the approximate 600 homeless veterans in the Sacramento County area. All potential adverse effects can be mitigated, therefore there are no benefits to the physical or human environment by taking no federal action for this project. Benefits to the human environment by providing

veterans supportive housing in an area facing a housing affordability crisis, as well as on a site walking distance from key veteran services would not accrue.

The City has determined the project is consistent with the City plans, policies, and regulations for the project site. Not building on this infill site within the already developed Mather Village could result in more housing constructed further away from key veterans services, contributing to urban sprawl, regional traffic congestion and regional air quality problems.

# **Summary of Findings and Conclusions:**

The environmental assessment has determined that the construction of the Mercy Mather Village Phase 4 Project would have no adverse effect on the human or physical environment. The project would construct 70 supportive housing units for senior veterans aged 55+ experiencing homelessness. The activities are consistent with adopted plans and policies, and the new development would connect to existing municipal services that the City has determined are adequate to serve infill development. The surrounding vicinity has transit access to a full range of commercial, medical, emergency, social and recreational services to serve the future residents. Measures are in place to address unanticipated discoveries of tribal cultural resources during ground moving activities. The project will therefore have a beneficial effect on the quality of the human environment and no adverse effect on the natural environment.

# Mitigation Measures and Conditions [40 CFR 1505.2(c)]

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure
Historic Preservation  National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	MM-HS-1: Unanticipated Discoveries. The following mitigation measure is intended to address the evaluation and treatment of inadvertent/unanticipated discoveries of potential tribal cultural resources (TCRs), archaeological, or cultural resources during a project's ground disturbing activities. If any suspected TCRs are discovered during ground disturbing construction activities, all work shall cease within 100 feet of the find, or an agreed upon distance based on the project area and nature of the find. A Tribal Representative from a California Native American tribe that is traditionally and culturally affiliated with a geographic area shall be immediately notified and shall determine if the find is a TCR (PRC §21074). The Tribal Representative will make recommendations for further evaluation and treatment as necessary.
»,	When avoidance is infeasible, preservation in place is the preferred option for mitigation of TCRs under CEQA and UAIC protocols, and every effort shall be made to preserve the resources in place, including through project redesign, if feasible. Culturally appropriate treatment may be, but is not limited to, processing materials for reburial, minimizing handling of cultural objects, leaving objects in place within the landscape, or returning objects

to a location within the project area where they will not be subject to future impacts. Permanent curation of TCRs will not take place unless approved in writing by UAIC, or by the California Native American Tribe that is traditionally and culturally affiliated with the project area. The contractor shall implement any measures deemed by the CEQA lead agency to be necessary and feasible to preserve in place, avoid, or minimize impacts to the resource, including, but not limited to, facilitating the appropriate tribal treatment of the find, as necessary. Treatment that preserves or restores the cultural character and integrity of a TCR may include Tribal Monitoring, culturally appropriate recovery of cultural objects, and reburial of cultural objects or cultural soil. Work at the discovery location cannot resume until all necessary investigation and evaluation of the discovery under the requirements of the CEQA, including AB52, have been satisfied.

MM-HS-2: Post Review Discoveries of Tribal Resources. The following measure is intended to address post review discoveries of cultural resources that may be of religious and cultural significance to the United Auburn Indian Community of the Auburn Rancheria (UAIC).

Cultural items include isolated artifacts, darkened soil (midden), shell fragments, faunal bone fragments, fire affected rock and clay, bedrock mortars, bowl mortars, hand stones and pestles, flaked stone, and articulated or disarticulated human remains. In general, the UAIC do not consider archaeological data recovery or curation of artifacts to be appropriate or respectful. The types of treatment preferred by UAIC that protect, preserve, or restore the integrity of a cultural resource may include Tribal Monitoring, and recovery and reburial of cultural objects or cultural soil that is done with dignity and respect. Recommendations for the treatment of a cultural resource will be documented in the project record. For any recommendations made by traditionally and culturally affiliated Native American Tribes that are not implemented, a justification for why the recommendation was not followed will be provided in the project record.

If potentially significant cultural resources are discovered during ground disturbing construction activities, all work shall cease within 100 feet of the find. A Native American Representative from traditionally and culturally affiliated Native American Tribes shall be contacted immediately to assess the significance and cultural value of the find and make recommendations for further evaluation and treatment, as necessary. A qualified cultural resources specialist (archaeologist) meeting the Secretary of Interior's Standards and Qualifications for Archaeology, may also assess the significance of the find in joint consultation with Native American Representatives to ensure that Tribal values are considered. Work shall remain suspended or slowed within 100 feet of the find until the resource is evaluated, which shall occur within one day, but no more than two days, of the find.

		The project applicant shall coordinate with a UAIC Tribal Representatives any necessary investigation and evaluation of the discovery under the requirements of Section 106 of the National Historic Preservation Act. Preservation in place is the preferred alternative and every effort must be made to preserve the resources in place, including through project redesign. The contractor shall implement any measures deemed by the lead agency to be necessary and feasible to preserve in place, avoid, or minimize significant effects to the resources, including the use of a paid Native American Monitor whenever work is occurring within 100 feet of the find. If adverse impacts to a cultural resource or unique archeological resources occurs, then consultation with UAIC, and other traditionally and culturally affiliated Native American Tribes regarding adverse effects shall occur, pursuant to 36 Code of Federal Regulations §800.5, Assessing Adverse Effects, and §800.6, Resolution of Adverse Effects.
	Clean Air	MM-AQ-1:
	Clean Air Act, as amended, particularly section 176(c) & (d); 40	All diesel heavy equipment shall be Tier4F as specified by the US Environmental Protection Agency.
a v	CFR Parts 6, 51, 93	2. A dust control plan shall be prepared and posted at the job site. The dust control plan shall include daily watering of exposed soil areas, soil piles, and other dust sources. Further construction mitigation measures shall be implemented as specified in the SMAQMD Basic Emission Control Practices (below).
	, 4	3. All diesel equipment shall use Renewable Diesel, which is widely available in the region.
ti .	·	2. Renewable Diesel is refined from waste fats, grease, and oil and meets or exceeds ASTM standards for diesel fuel. Renewable Diesel typically reduces greenhouse gas emissions by about 75% below those of fossil diesel. Renewable Diesel also contains no sulfur and thus reduces toxic diesel particulate emissions compared to fossil diesel.
	Contamination and Toxic	MM-Tox-1: Dring construction, to mitigate the exposure to lead
	Substances  24 CFR Part 50.3(i) & 58.5(i)(2)	the developer must excavate and dispose offsite, additional laboratory analysis is needed to determine whether this is a California hazardous waste.
	e e	MM-Tox-2: Since three compounds were detected in soil vapor samples at concentrations exceeding their corresponding residential screening levels for vapor intrusion pathway, vapor mitigation, such as the use of vapor barrier, shall be designed to the satisfaction of the City. Pre-occupancy indoor air sampling shall be conducted to verify the effectiveness of vapor mitigation measures.

	MM-Tox-3: To comply with HUD's Policy on Radon. The developer must conduct post-construction radon testing within the building followed by mitigation if needed (mitigation required if level is above 4 pCi/L or more).	
<b>Environmental Justice</b>	MM-EJ-1	
Executive Order 12898	The EJScreen shows high ambient levels of PM2.5 and diesel particulate matter and this project will house vulnerable seniors; therefore the developer shall provide enhanced air filtration for the Project HVAC or PTAC systems at the US EPA recommends air filtration at MERV 13 or better for HVAC Systems or HEPA grade, and captures particulate down to 0.3 microns for PTAC systems.	
Vegetation, Wildlife	MM-VEG-1	
	<ol> <li>If any construction activities (e.g., clearing, grubbing, or grading) are scheduled during the bird nesting season (typically defined by CDFW as February 1 to September 1), the approved construction contractor shall retain a qualified biologist to conduct a pre-construction survey of the project area, including a 100-foot buffer, as access is available, to locate active bird nests, identify measures to protect the nests, and locate any other special status species. Surveys shall be conducted in all potential habitat located at project work sites and in staging and storage areas.</li> </ol>	
	<ol> <li>The pre-construction survey shall be conducted no more than 5 days prior to the implementation of construction activities (including staging and equipment storage).</li> </ol>	
	3. Any active nest shall not be disturbed until the young have fledged or construction monitored under the direction of a qualified biologist. The Qualified Biologist shall observe any identified active nests prior to the start of any construction-related activities to establish a behavioral baseline of the adults and any nestlings. Once work commences, all active nests should be continuously monitored by the Qualified Biologist to detect any signs of disturbance and behavioral changes as a result of the project. In addition to direct impacts, such as nest destruction, nesting birds might be affected by noise, vibration, odors and movement of workers or equipment. If signs of disturbance and behavioral changes are observed, the biological personnel responsible shall cease work causing that change and shall contact the CDFW for guidance.	



# U.S. Department of Housing and Urban Development

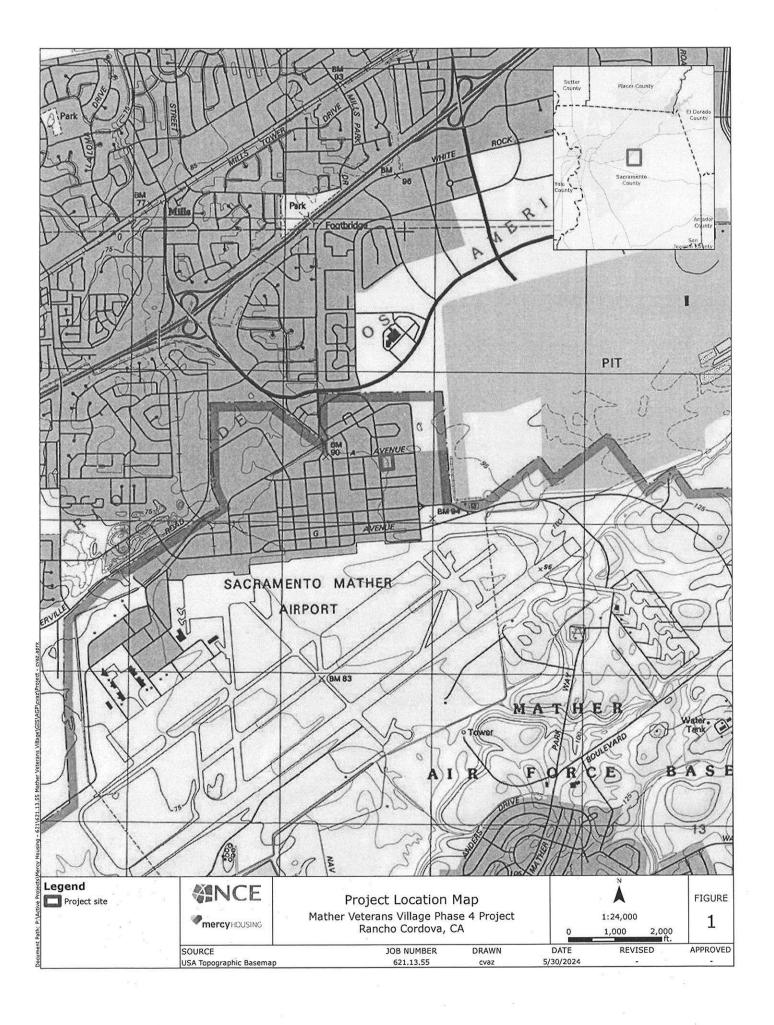
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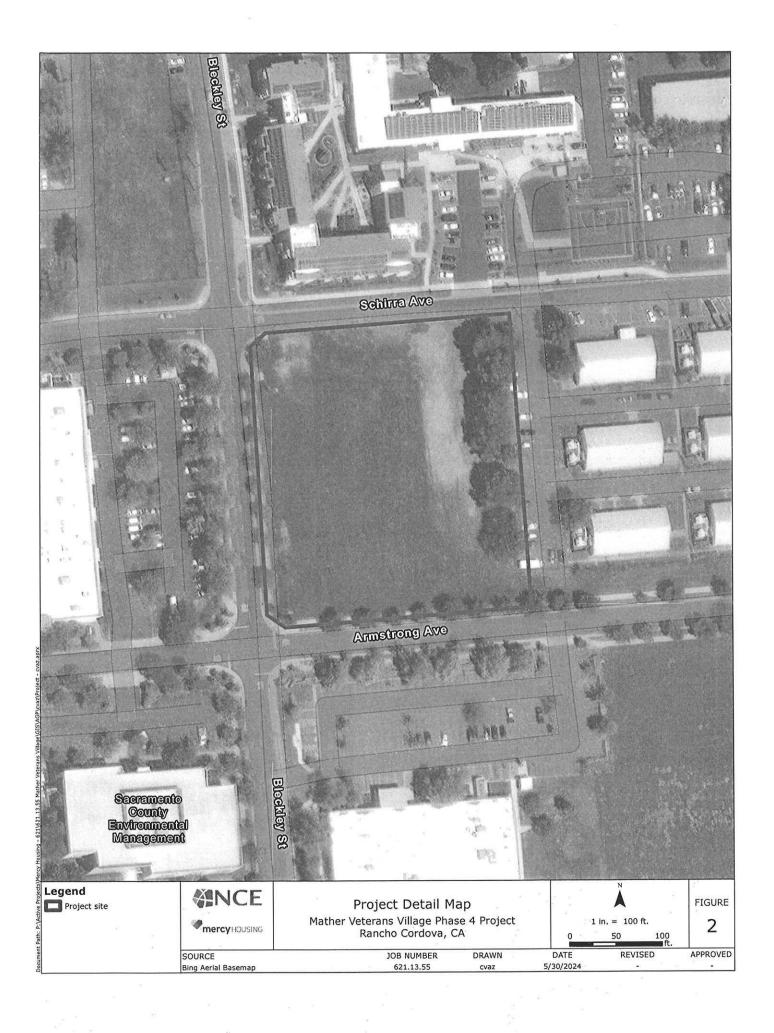
espanol.hud.gov

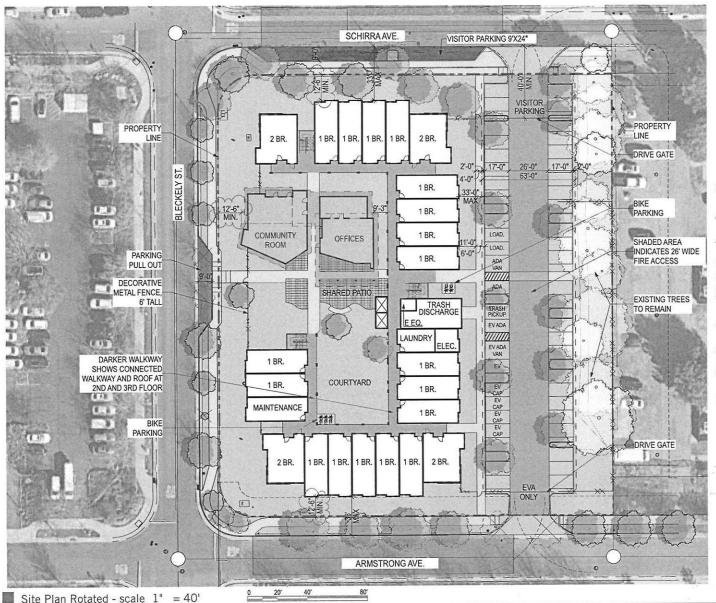
# **Determination:**

Finding of No Significant Impact [24 CFR 58.40(g)(1); 4 The project will not result in a significant impact on the quality of	
Finding of Significant Impact [24 CFR 58.40(g)(2); 40 CT The project may significantly affect the quality of the human environment.	
Preparer Signature: Hail M. Grin	Date:10/22/2024
Name/Title/Organization: Gail M. Ervin RhD  NCE, Principal	
Certifying Officer Signature:  Name/Title:  Micah Runner, City Manage	Date: w/rs/rd

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).







# SITE INFORMATION:

APROX. 1.75 ACRES TO R.O.W.

APROX. DENSITY: 40 D.U./ACRE

UNIT MIX: (58) 1-BEDROOM UNITS (12) 2-BEDROOM UNITS TOTAL: 70 UNITS

4,000 SF COMMUNITY BUILDING

APPROX. 45 PARKING SPACES INCLUDING ADA, EV, LOADING 6 BICYCLE PARKING

MAX. BLDG. HEIGHT: 45'

