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FINDINGS OF FACT AND
STATEMENT OF OVERRIDING CONSIDERATIONS

SACRAMENTO STATE Placer Center

SCH No. 2021060116

Prepared for:



SACRAMENTO STATE

California State University, Sacramento
Planning, Design, & Construction

January 2024

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LIST OF ABBREVIATIONS

ADWF	average dry weather flow
CAAQS	California Ambient Air Quality Standards
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CSU	California State University
dBA	A-weighted decibels
EIR	environmental impact report
Findings	Findings of Fact
FTE	full-time equivalent
ITP	Incidental Take Permit
L_{eq}	Equivalent Continuous Sound Level
mgd	million gallons per day
MLD	most likely descendant
MMRP	mitigation monitoring and reporting program
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCIC	North Central Information Center
NO_x	oxides of nitrogen
NOP	notice of preparation
NPDES	National Pollutant Discharge Elimination System
PCA	Placer Conservation Authority
PCACPD	Placer County Air Pollution Control District
PCCP	Placer County Conservation Program
PGWWTP	Pleasant Grove Wastewater Treatment Plant
PM	particulate matter
PM_{10}	respirable particulate matter with aerodynamic diameter of 10 micrometers or less
$PM_{2.5}$	fine particulate matter with aerodynamic diameter of 2.5 micrometers or less
PRC	Public Resources Code
project	Sacramento State – Placer Center Master Plan Project
ROG	reactive organic gases
RWQCB	regional water quality control boards
SAP	Sunset Area Plan
SAP/PRSP	Sunset Area Plan/Placer Ranch Specific Plan
SPWA	South Placer Wastewater Authority
SVAB	Sacramento Valley Air Basin
TDM	Transportation Demand Management
UAIC	United Auburn Indian Community
USFWS	U.S. Fish and Wildlife Service
VdB	vibration decibels
VMT	vehicle miles traveled
VOC	volatile organic compound
WRSL	Western Regional Sanitary Landfill
WRSP EIR	West Roseville Specific Plan EIR
WWMP EIR	Wastewater Master Plan EIR

1 INTRODUCTION

1.1 PURPOSE

This statement of Findings of Fact (Findings) and Statement of Overriding Considerations addresses the environmental effects associated with the Sacramento State – Placer Center Master Plan (project) located in Placer County directly north of the City of Roseville. These Findings are made under Sections 21081, 21081.5, and 21081.6 of the California Environmental Quality Act (CEQA), Public Resources Code (PRC) Section 21000 et seq., and Sections 15091 and 15093 of the CEQA Guidelines, Title 14, California Code of Regulations Section 15000 et seq. (CEQA Guidelines). The potentially significant impacts were identified in both the Draft Environmental Impact Report (EIR) and the Final EIR, as well as additional facts found in the complete record of proceedings.

Public Resources Code Section 21081 and CEQA Guidelines Section 15091 require the lead agency to prepare written findings for identified significant impacts, accompanied by a brief explanation for the rationale for each finding. The California State University (CSU) Board of Trustees is the lead agency responsible for preparation of the EIR in compliance with CEQA and the CEQA Guidelines. Section 15091 of the CEQA Guidelines states, in part, that:

- a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:
 - 1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.
 - 2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
 - 3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

In accordance with Public Resource Code 21081 and Section 15093 of the CEQA Guidelines, whenever significant impacts cannot be mitigated to below a level of significance, the decision-making agency is required to balance, as applicable, the benefits of the proposed project against its unavoidable environmental risks when determining whether to approve the project. If the benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse effects may be considered "acceptable." In that case, the decision-making agency may prepare and adopt a Statement of Overriding Considerations, pursuant to the CEQA Guidelines.

Section 15093 of the CEQA Guidelines state that:

- a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."
- b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the Final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.

- c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

The Final EIR for the project identified potentially significant effects that could result from project implementation. However, the CSU Board of Trustees finds that the inclusion of certain mitigation measures as part of the project approval will reduce most, but not all, of those effects to less than significant levels. Those impacts that are not reduced to less than significant levels are identified and overridden due to specific project benefits in a Statement of Overriding Considerations.

In accordance with CEQA and the CEQA Guidelines, the CSU Board of Trustees adopts these Findings as part of its certification of the Final EIR for the Sacramento State - Placer Center Master Plan project. Pursuant to Section 21082.1(c)(3) of the Public Resources Code, the CSU Board of Trustees also finds that the Final EIR reflects the Board's independent judgment as the lead agency for the project. As required by CEQA, the CSU Board of Trustees, in adopting these Findings, also adopts a mitigation monitoring and reporting program (MMRP) for the project. The CSU Board of Trustees finds that the MMRP, which is incorporated by reference and made a part of these Findings, meets the requirements of Section 21081.6 of the Public Resources Code by providing for the implementation and monitoring of measures intended to mitigate potentially significant effects of the project.

1.2 ORGANIZATION AND FORMAT OF FINDINGS

Section 1.0, Introduction, contains a summary description of the Sacramento State - Placer Center Master Plan project and background facts relative to the environmental review process (see Sections 1.3 through 1.6, below).

Section 2.0 discusses the CEQA findings of independent judgment. Section 2.1 identifies the project's potential environmental effects that were determined not to be significant and, therefore, do not require mitigation measures. Section 2.2 describes the environmental effects determined not to be significant during the notice of preparation (NOP) scoping process and therefore were not discussed in the EIR. Section 2.3 identifies the potentially significant effects of the project that would be mitigated to a less than significant level with implementation of the identified mitigation measures. Section 2.4 of these Findings identifies the significant impacts of the project that cannot be mitigated to a less than significant level, even though all feasible mitigation measures have been identified and incorporated into the project.

Section 3.0 discusses the finds regarding the feasibility of the project alternatives that were studied in the EIR.

Section 4.0 discusses findings with respect to mitigation of significant adverse impacts, certification of the Final EIR, and adoption of the MMRP.

Section 5.0 contains the Statement of Overriding Considerations providing the Board of Trustees' views on the balance between the project's significant environmental effects and the merits and objectives of the project.

1.3 SUMMARY OF PROJECT DESCRIPTION

The Sacramento State – Placer Center Master Plan establishes the planning foundations for a new off-campus center, including enrollment, programming, phasing, land uses, infrastructure, and development and design guidelines. Buildout of the off-campus center would include administrative buildings; student and faculty housing; a student center; recreation and athletic facilities; a performing arts center; a hotel and conference center; a continuing education center; academic, research, and industry buildings (academic mixed-use); support services; and parking. The campus would include open space areas for active and passive recreation and provide opportunities for workforce development. Buildout of Sacramento State – Placer Center is anticipated in four phases over 35 years.

A CSU capacity assessment identified a market demand of 5,200 students for the Sacramento region by 2035. Enrollment projections are projected to exceed planned capacity by 21 percent in the Sacramento region, including Placer County. Sacramento State - Placer Center is intended to alleviate this pressure on Sacramento State's main

campus and meet the needs of the Placer County population, which is one of the fastest-growing regions in California, and one of three areas of California where enrollment demand is expected to exceed capacity in the coming years. The Master Plan is designed to meet the identified space needs with appropriate facilities in four phases of development, eventually realizing an off-campus center that serves approximately 20,000 undergraduate students (headcount) or 12,000 full-time equivalent (FTE) students, including approximately 5,000 Sierra College FTE students and approximately 7,000 Sacramento State FTE students.

Sacramento State – Placer Center is intended to expand access to higher education in the region through an innovative partnership with Sierra College, while serving as an anchor institution for the larger community and future development in the Sunset Area of Placer County. The off-campus center would also be rooted in partnerships with the County and outside industry. The Master Plan is intended to guide development and operation of a campus that is sustainable and resilient; that provides a successful student experience; and that establishes a new model of education, innovation, and community engagement. While Sacramento State - Placer Center would start off as an off-campus center tied to Sacramento State, the potential exists for it to turn into an independent CSU campus in the long term.

1.4 PROJECT OBJECTIVES

The Master Plan is organized around the following five goals that guide the future development of Sacramento State - Placer Center. Specific project objectives support each of the five goals.

► Support Academic and Student Success

- create a seamless transition of students from Sierra College to Sacramento State;
- offer applied learning opportunities for students, faculty, and staff utilizing indoor and outdoor space throughout the site as well as public-private partnerships for hands-on, real-world knowledge and skill development;
- align academic programming and related facilities with the emerging workforce needs of the region;
- distribute facilities, programs, and services across the campus to complement classes, including a library, flexible study spaces, and a Student Success Center that serves as a central node for academic needs, from academic advising to tutoring services to transfer student support;
- integrate the onsite natural resources into the academic programming, supporting hands-on learning opportunities within the open space areas of the off-campus center; and
- develop student and faculty housing in tandem with campus growth to support resident students and faculty, reduce vehicular trips to/from campus, and alleviate critical housing needs.

► Realize Diversity, Inclusion, and Access

- increase access to higher education opportunities in the region by developing a public university campus in an area that currently has limited access to four-year post-secondary educational facilities;
- promote multimodal connections that equitably integrate all individuals, including resident students, resident faculty, staff, commuter students, outside community members, and professional partners; and
- support the provision of basic needs for student success and well-being through the provision of food, childcare, healthcare, counseling and mental health services, technology, transportation services, spaces to gather and engage, and recreational facilities.

► Anchor Placer Center in Partnerships

- develop and catalyze the regional workforce through qualified graduates;
- establish an on-campus industry partnership zone in the northern portion of the site, in proximity to the neighboring PRSP Campus Park district, where much of the research and development and light-industrial

activities are planned, to attract and accommodate industry partnerships and create jobs for the local workforce; and

- include facilities that benefit both the campus and surrounding community, such as the library, conference center, performing arts center, fire station and training center, forensics lab, continuing education building, and campus hotel;

▶ **Promote Community Building and Place Making**

- create a network of campus spaces that accommodates food venues, wellness, socializing and collaboration, and childcare and that are integrated with the campus fabric, enhance the public realm, and support student success;
- create a walkable, bikeable campus, designed at the human scale, interlaced with trails and outdoor gathering areas, such as plazas and amphitheaters; and
- establish gateways to the campus that provide a clear sense of arrival on campus and welcome all modes of travel.

▶ **Be a Model for Resiliency and Sustainability**

- design and develop a zero net energy campus, to the extent feasible, with Leadership in Energy and Environmental Design (LEED) Silver-equivalent buildings, low-energy demand buildings, electric building systems, gas-free appliances, and onsite renewable energy facilities;
- design and develop a net zero water use campus, to the extent feasible, through use of recycled water, smart metering, water-efficient fixtures, onsite natural biofiltration, and native drought-tolerant landscaping;
- establish open space around the onsite stream system, which provides hydrologic and habitat values;
- reduce the potential for increased stormwater flows and off-site flooding through implementation of onsite best management practices, low impact development measures, and onsite detention of peak flows to less than pre-project conditions;
- reduce vehicle miles traveled and associated air quality and greenhouse gas emissions, to the extent feasible, for Sacramento State students, Sierra College students, faculty, staff, and other employees that live in eastern Sacramento County, Placer County, and Nevada County;
- meet the CSU goal for 80 percent of solid waste to be diverted from landfills, and strive for 90 percent diversion, through reduction of single-use materials, expanding composting, and expanding material recovery programs;
- prepare for power outages, to the extent feasible, with battery storage and critical load back up, onsite solar energy generation, and passive survivability design elements in buildings such as shading, natural ventilation, and low energy demands; and
- adapt to rising temperatures by integrating shading throughout campus and selecting hardscape to minimize the urban heat island effect.

1.5 MASTER PLAN ELEMENTS

The Sacramento State - Placer Center Master Plan establishes the planning foundations for the new off-campus center including the physical accommodation of projected enrollment, programming, land uses, infrastructure, development phasing, and development and design guidelines. Buildout of Sacramento State – Placer Center is anticipated in four phases over a period of 35 years, as summarized in the Table ES-1, of the Draft EIR, below.

Table ES-1 Sacramento State – Placer Center Master Plan Phasing and Programming Summary

Project Component	Phase 1	Phase 2	Phase 3	Phase 4	Total (all Phases)
Development Duration (Years)	0-7	7-15	15-25	25-35	35
Student Enrollment ¹	1,500 FTE (2,500 HC) <i>1,000 FTE Sierra College</i> <i>500 FTE Sacramento State</i>	5,000 FTE (8,333 HC) <i>3,000 FTE Sierra College</i> <i>2,000 FTE Sacramento State</i>	12,000 FTE (20,000 HC) <i>5,000 FTE Sierra College</i> <i>7,000 FTE Sacramento State</i>	0	12,000 FTE (20,000 HC)
Faculty/Staff ²	136 FTE	454 FTE	1,089 FTE	0	1,089 FTE
Employees for Community Anchors (Partnership Space) _{3,4}	327 FTE	16 FTE	1,100 FTE	0	1,443 FTE
Traditional Higher Education Space/Support Facilities/Housing	179,000 GSF	709,000 GSF	1,200,000 GSF		2,088,000 GSF
Community Anchors ⁴ (Partnership Space)	208,000 GSF	10,000 GSF	675,000 GSF		893,000 GSF
Academic Mixed-Use (Industry Partnership Zone)				947,000	947,000 GSF
Parking Structure	0	0	443,000 GSF	576,000 GSF	1,019,000 GSF
Parking Spaces (surface/structure)	1,126 (+1,126/0)	2,208 (+2,614, -406/0)	3,267 (+2,721, -1,160 /1,706)	36 (-2,410/2,446)	6,637 (2,485/4,152)
Housing Units	0	250 traditional beds 5 faculty housing units	450 mini-suites 500 apartment beds 15 faculty housing units	0	250 traditional beds 450 mini-suites 500 apartment beds 20 faculty housing units
Stadium	-	-	3,000 seat stadium	-	3,000 seat stadium

Notes: FTE = full-time equivalent; HC = headcount; GSF = gross square feet; SF = square feet

¹ The FTE calculation reflects the expectation that full-time undergraduate students will enroll in 15 units per quarter. As a metric for communicating the size of enrollment, FTE is always lower than student headcount, because not all students take full-time course loads each quarter.

² Staff/Faculty estimates provided by Sacramento State in January 2022 (Nunez, pers. comm., 2022)

³ Employment estimates generated by the SACSIM land use-based model utilized in this EIR for the analysis of vehicle miles traveled (See Appendix B).

⁴ Community Anchors (partnership space) would be located on the Sacramento State – Placer Center site and would include the Library, Conference Center, Performing Arts Center, Continuing Education Facility, Forensics Lab, Hotel, Childcare Facility, and Placer County Fire Station and Training Center.

Source: Information provided by Sasaki 2022 and compiled by Ascent Environmental 2022.

1.6 ENVIRONMENTAL REVIEW PROCESS

1.6.1 Notice of Preparation

In accordance with CEQA (PRC Section 21092) and the State CEQA Guidelines (14 CCR Section 15082), Sacramento State issued an NOP on June 7, 2021. Sacramento State circulated the NOP to responsible and trustee agencies, organizations, and interested individuals to solicit comments on the proposed project. Sacramento State followed required procedures with regard to distribution of the appropriate notices and environmental documents to the State Clearinghouse. The NOP was received by the State Clearinghouse (State Clearinghouse No. 2021060116) and a 30-day public review period ended on July 7, 2021. A public scoping meeting was conducted by Sacramento State on June 15, 2021.

1.6.2 Draft Environmental Impact Report

In accordance with CEQA (PRC Sections 21000-21177) and the State CEQA Guidelines (14 CCR Sections 15000-15387), Sacramento State prepared a Draft EIR to address the potential significant environmental effects associated with the Sacramento State - Placer Center Master Plan. The Draft EIR addresses the following potentially significant environmental issues:

- ▶ aesthetics;
- ▶ agricultural resources;
- ▶ air quality;
- ▶ biological resources;
- ▶ cultural resources;
- ▶ energy;
- ▶ geology and soils;
- ▶ greenhouse gas emissions and climate change;
- ▶ hazards, hazardous materials, and wildfire;
- ▶ hydrology and water quality;
- ▶ land use and planning;
- ▶ noise;
- ▶ population and housing;
- ▶ public services and recreation;
- ▶ transportation;
- ▶ tribal cultural resources; and
- ▶ utilities and service systems.

Sacramento State published the Draft EIR for public and agency review on September 15, 2023 for a 45-day public review period that ended on October 30, 2023.

During the public review period, the Draft EIR was available for public review at the following locations:

- ▶ Online at <https://www.csus.edu/administration-business-affairs/facilities-management/news-archive.html>.
- ▶ Public Libraries: Roseville Library (225 Taylor Street); Rocklin Library (4890 Granite Drive); and Lincoln Library (485 Twelve Bridges Drive).
- ▶ Sierra College: Rocklin Campus Library (5100 Rocklin Road).
- ▶ Sacramento State: Office of Planning, Design, and Construction 6000 J Street Sacramento.

Sacramento State hosted a public meeting on October 5, 2023 via webinar to inform interested parties about the project, provide a summary of the environmental impact conclusions from the Draft EIR, and give agencies and the public an opportunity to provide comments on the EIR.

During the Draft EIR public review period, Sacramento State received three letters from state agencies, seven letters from local/regional agencies, and two letters from organizations and individuals. All comment letters received in response to the Draft EIR were reviewed and included in the Final EIR, and responses to significant environmental points raised in the review were addressed in the Final EIR in compliance with the CEQA Guidelines (Sections 15088, 15132).

1.6.3 Final Environmental Impact Report

Section 15088 of the State CEQA Guidelines requires that the Lead Agency responsible for the preparation of an EIR evaluate comments on environmental issues and prepare written responses addressing each of the comments. The intent of the Final EIR is to provide a forum to address comments pertaining to the information and analysis contained within the Draft EIR, and to provide an opportunity for clarifications, corrections, or revisions to the Draft EIR as needed and as appropriate.

The Final EIR assembles in one document all the environmental information and analysis prepared for the proposed project, including comments on the Draft EIR and lead agency responses to those comments.

In accordance with State CEQA Guidelines Section 15132, the Final EIR for the proposed project consists of: (i) the Draft EIR and subsequent revisions; (ii) comments received on the Draft EIR; (iii) a list of the persons, organizations, and public agencies commenting on the Draft EIR; (iv) written responses to significant environmental issues raised during the public review and comment period and related supporting materials; and, (v) other information contained in the EIR, including EIR appendices.

The Final EIR was released on January 17, 2024 and was made available for review by commenting agencies, in accordance with CEQA requirements. The Final EIR was also made available to the public online at <https://www.csus.edu/administration-business-affairs/facilities-management/news-archive.html>.

2 CEQA FINDINGS OF INDEPENDENT JUDGMENT

2.1 EFFECTS DETERMINED NOT TO BE SIGNIFICANT

Section 15128 of the State CEQA Guidelines requires an EIR to contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were, therefore, not discussed in detail in the EIR. This information is addressed under the heading "Issues Not Discussed Further" in each resource section of the Final EIR and, with respect to those issue areas that were scoped out as part of the NOP process, at the beginning of Chapter 3, "Environmental Impacts and Mitigation Measures" of the Final EIR. Based on these discussions, implementation of the Sacramento State - Placer Center Master Plan was determined to result in no potentially significant impacts related to the following issues, which were therefore, not discussed in detail in the EIR:

- ▶ Aesthetics: the Sacramento State - Placer Center Master Plan would not impact scenic vistas, scenic trails, or designated or eligible scenic highways;
- ▶ Agricultural Resources: the Sacramento State - Placer Center Master Plan would not conflict with existing agricultural zoning for agricultural use or a Williamson Act contract;
- ▶ Agricultural Resources: the Sacramento State - Placer Center Master Plan would not conflict with existing zoning for, or cause rezoning of, forestland or timberland and would not result in the loss of forestland or conversion of forestland to non-forest use;
- ▶ Agricultural Resources: the Sacramento State - Placer Center Master Plan would not result in the indirect conversion of agricultural land to nonagricultural use and would not conflict with land use buffers for agricultural operations because the surrounding lands have been approved for urban development under the SAP/PRSP;
- ▶ Biological Resources: the Sacramento State - Placer Center Master Plan would not impact riparian habitat;
- ▶ Biological Resources: the Sacramento State - Placer Center Master Plan would not conflict with local plans, policies, or regulations related to the protection of biological resources;
- ▶ Cultural Resources: the Sacramento State - Placer Center Master Plan would not impact historical resources;
- ▶ Geology and Soils: the Sacramento State - Placer Center Master Plan would not impact unique geologic features;

- ▶ Geology and Soils: the Sacramento State - Placer Center Master Plan would not expose people or structures to potential substantial adverse effects related to the rupture of a known earthquake fault;
- ▶ Geology and Soils: the Sacramento State - Placer Center Master Plan would not result in exposure of people or structures to substantial adverse effects related to seismic hazards, nor would implementing the project have the potential to exacerbate these hazards;
- ▶ Geology and Soils: the Sacramento State - Placer Center Master Plan would not involve locating facilities on unstable geologic units as the project site does not contain unstable geologic units or soils, including those susceptible to landslide, subsidence, collapse, or compaction and implementation of the project would conform to the current California Building Code;
- ▶ Geology and Soils: the Sacramento State - Placer Center Master Plan would not involve the construction or use of septic tanks;
- ▶ Hazards and Hazardous Materials: the Sacramento State - Placer Center Master Plan would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
- ▶ Hazards and Hazardous Materials: the Sacramento State - Placer Center Master Plan would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment;
- ▶ Hazards and Hazardous Materials: the Sacramento State - Placer Center Master Plan is not located within two miles of a public airport or public use airport and would not result in a related safety hazard or excessive noise for people residing or working in the project area;
- ▶ Hydrology and Water Quality: the Sacramento State - Placer Center Master Plan would not result in increased risks related to tsunamis, or seiche zone, nor the release of pollutants due to inundation;
- ▶ Mineral Resources: the Sacramento State - Placer Center Master Plan would not result in the loss of availability of mineral resources;
- ▶ Land Use: the Sacramento State - Placer Center Master Plan would not divide an established community;
- ▶ Noise: the Sacramento State - Placer Center Master Plan would not generate excessive groundborne vibration or groundborne noise levels during operation;
- ▶ Noise: the Sacramento State - Placer Center Master Plan would not expose people residing or working in the Master Plan area to excessive noise associated with airport/airstrip-related operations;
- ▶ Noise: the Sacramento State - Placer Center Master Plan would not expose people residing or working in the Master Plan area to excessive noise associated with railroad operations;
- ▶ Population and Housing: the Sacramento State - Placer Center Master Plan would not displace people or homes, necessitating the construction of replacement housing elsewhere;
- ▶ Population and Housing: the Sacramento State - Placer Center Master Plan would support the generation of employment in the SAP and PRSP, supporting a balance of jobs and housing consistent with the Placer County Goal 1.M, and the project-related addition of jobs in the area would be consistent with the County's Goal 1.N and Policy 1.N.10; and
- ▶ Transportation: the Sacramento State - Placer Center Master Plan would not cause any unique construction activity that would require deviation from standard Placer County practices.

2.2 LESS THAN SIGNIFICANT IMPACTS

The Board of Trustees finds that, based upon substantial evidence in the record, including information in the Final EIR, the following impacts have been determined be less than significant and no mitigation is required pursuant to Public Resources Code section 21081(a) and CEQA Guidelines section 15091(a):

2.2.1 Aesthetics

An evaluation of the project's visual resources impacts is found in Section 3.1, "Aesthetics," of the Final EIR. Although implementation of the Sacramento State - Placer Center Master Plan would substantially change the visual character of the site from undeveloped rural grassland to a college campus, the off-campus center would be located within a visual context that includes approved PRSP development and the project site views would be consistent with views in the immediate project vicinity. Therefore, the project would have a less than significant impact on the visual character or quality of the site and its surroundings (**Impact 3.1-1 and Cumulative**). Development of Sacramento State – Placer Center would result in new sources of light and glare that may affect daytime views; however, Master Plan design elements and landscaping plans that prevent and obscure daytime glare (**Impact 3.1-3 and Cumulative**).

FINDING

The CSU Board of Trustees finds that, based upon substantial evidence in the record, the project would have less than significant effects related to visual character and contribution of light and glare that may affect daytime views and no mitigation measures are required.

2.2.2 Agricultural Resources

An evaluation of the project's agricultural resources impacts is found in Section 3.2, "Agricultural Resources," of the Final EIR. Implementation of the Sacramento State - Placer Center Master Plan would be consistent with the local zoning designation, SPL-PRSP, and would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use (**Impact 3.2-1 and Cumulative**).

FINDING

The CSU Board of Trustees finds that, based upon substantial evidence in the record, the project would have less than significant effects related to conversion of important farmland to nonagricultural uses and no mitigation measures are required.

2.2.3 Air Quality

An evaluation of the project's air quality impacts is found in Section 3.3, "Air Quality," of the Final EIR. Implementation of the Sacramento State - Placer Center Master Plan is not projected to result in any significant impacts related to conflicts with or obstructing implementation of an applicable air quality plan (**Impact 3.3-1 and Cumulative**); construction emissions of criteria air pollutants or ozone precursors that exceed the PCAPCD's thresholds (**Impact 3.3-2 and Cumulative**); short- or long-term increases in localized carbon monoxide (CO) emissions that would expose sensitive receptors to unhealthy levels (**Impact 3.3-4 and Cumulative**); or exposure of sensitive receptors to substantial increases in TAC emissions (**Impact 3.3-5 and Cumulative**).

FINDING

The CSU Board of Trustees finds that, based upon substantial evidence in the record, the project would have less than significant effects related to conflicts with or obstructing implementation of an applicable air quality plan,

construction-related criteria air pollutants or ozone precursors, short- or long-term increases in localized CO emissions that would expose sensitive receptors to unhealthy levels, and exposure of sensitive receptors to substantial increases in TAC emissions and no mitigation measures are required.

2.2.4 Biological Resources

An evaluation of the project's biological resources impacts is found in Section 3.4, "Biological Resources," of the Final EIR. Implementation of the Sacramento State - Placer Center Master Plan is not projected to result in any significant impacts related to wildlife movement corridors and wildlife nurseries (**Impact 3.4-4 and Cumulative**) or conflicts with the provisions of an adopted habitat conservation plan or natural community conservation plan (**Impact 3.4-5 and Cumulative**).

FINDING

The CSU Board of Trustees finds that, based upon substantial evidence in the record, the project would have less than significant effects related to wildlife movement corridors and wildlife nurseries, and conflicts with the provisions of an adopted habitat conservation plan or natural community conservation plan and no mitigation measures are required.

2.2.5 Cultural Resources

An evaluation of the project's cultural resources impacts is found in Section 3.5, "Cultural Resources," of the Final EIR. Implementation of the Sacramento State - Placer Center Master Plan is not projected to result in any significant impacts related to the disturbance of human remains (**Impact 3.5-2 and Cumulative**). Compliance with California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097 would provide an opportunity to avoid or minimize the disturbance of human remains, and to appropriately treat any remains that are discovered.

FINDING

The CSU Board of Trustees finds that, based upon substantial evidence in the record, the project would have less than significant effects related to disturbance of human remains and no mitigation measures are required.

2.2.6 Energy

An evaluation of the project's energy impacts is found in Section 3.6, "Energy," of the Final EIR. Implementation of the Sacramento State - Placer Center Master Plan is not projected to result in any significant impacts related to wasteful, inefficient, or unnecessary consumption of energy or wasteful use of energy resources (**Impact 3.6-1 and Cumulative**); or conflict with or obstruct a state or local plan for renewable energy or energy efficiency (**Impact 3.6-2 and Cumulative**).

FINDING

The CSU Board of Trustees finds that, based upon substantial evidence in the record, the project would have less than significant effects related to wasteful, inefficient, or unnecessary consumption of energy; wasteful use of energy resources; and conflict with or obstruction of a state or local plan for renewable energy or energy efficiency and no mitigation measures are required.

2.2.7 Geology and Soils

An evaluation of the project's geology and soils impacts is found in Section 3.7, "Geology and Soils," of the Final EIR. Implementation of the Sacramento State - Placer Center Master Plan is not projected to result in any significant impacts related to substantial erosion or loss of topsoil during construction (**Impact 3.7-1 and Cumulative**) or risk of damage from development on expansive soils (**Impact 3.7-2 and Cumulative**).

FINDING

The CSU Board of Trustees finds that, based upon substantial evidence in the record, the project would have less than significant effects related to substantial erosion, loss of topsoil during construction, and development on expansive soils and no mitigation measures are required.

2.2.8 Greenhouse Gas Emissions

An evaluation of the project's impacts on greenhouse gas emissions is found in Section 3.8, "Greenhouse Gas Emissions," of the Final EIR. The Sacramento State – Placer Center Master Plan includes numerous project design features that serve to further the state's efforts to reduce GHG emissions, including onsite EV charging facilities, no natural gas infrastructure, a renewable energy solar microgrid with battery storage, and onsite trip reduction strategies to reduce reliance on vehicle use. In consideration of these features, the project would be consistent with the priority areas identified in Appendix D of the 2022 Scoping Plan of transportation electrification, vehicle miles traveled (VMT) reduction, and building energy reduction and would thus be consistent with the goals of the 2022 Scoping Plan. For these reasons, the project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment or conflict with state GHG reduction goals (**Impact 3.8-1**).

FINDING

The CSU Board of Trustees finds that, based upon substantial evidence in the record, the project would have less than significant effects related to generation of GHGs and no mitigation measures are required.

2.2.9 Hazards, Hazardous Materials, and Wildfire

An evaluation of the project's impacts related to hazards, hazardous materials, and wildfire is found in Section 3.9, "Hazards, Hazardous Materials, and Wildfire," of the Final EIR. Implementation of the Sacramento State - Placer Center Master Plan would not create a significant hazard to the public or the environment through the routine transport, use, disposal or potential upset conditions hazardous materials (**Impact 3.9-1 and Cumulative**); impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan (**Impact 3.9-2 and Cumulative**); expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires (**Impact 3.9-3 and Cumulative**); or increased risk of health hazards from vector-borne diseases (**Impact 3.9-4**).

FINDING

The CSU Board of Trustees finds that, based upon substantial evidence in the record, the project would have less than significant effects related to transport, use, or disposal of hazardous materials; interference with an adopted emergency response plan or emergency evacuation plan; exposure to risks involving wildland fires; and health hazards from vector-borne diseases and no mitigation measures are required.

2.2.10 Hydrology and Water Quality

An evaluation of the project's hydrology and water quality impacts is found in Section 3.10, "Hydrology and Water Quality," of the Final EIR. Implementation of the Sacramento State - Placer Center Master Plan is not projected to result in any significant impacts related to violation of any water quality standards or waste discharge requirements or otherwise cause substantial degradation of surface water or groundwater quality during construction or operation (**Impacts 3.10-1, 3.10-2, and Cumulative**); or conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan (**Impact 3.9-4 and Cumulative**).

FINDING

The CSU Board of Trustees finds that, based upon substantial evidence in the record, the project would have less than significant effects related to violation of any water quality standards or waste discharge requirements or otherwise cause substantial degradation of surface water or groundwater quality during construction or operation; or conflict with or obstructing implementation of a water quality control plan or sustainable groundwater management plan and no mitigation measures are required.

2.2.11 Land Use

An evaluation of the project's land use impacts is found in Section 3.11, "Land Use and Planning," of the Final EIR. Implementation of the Sacramento State – Placer Center Master Plan is not projected to result in any significant impacts related to consistency with adopted land use plans and compatibility with existing and planned development (**Impact 3.11-2**).

FINDING

The CSU Board of Trustees finds that, based upon substantial evidence in the record, the project would have less than significant effects related to consistency with adopted land use plans and compatibility with existing and planned development and no mitigation measures are required.

2.2.12 Population and Housing

An evaluation of the project's population and housing impacts is found in Section 3.13, "Population and Housing," of the Final EIR. Implementation of the Sacramento State - Placer Center Master Plan is not projected to result in any significant impacts related to direct or indirect inducement of substantial unplanned population growth and housing demand (**Impact 3.13-1 and Cumulative**).

FINDING

The CSU Board of Trustees finds that, based upon substantial evidence in the record, the project would have less than significant effects related to direct or indirect inducement of substantial unplanned population growth and housing demand and no mitigation measures are required.

2.2.13 Public Services and Recreation

An evaluation of the project's public services and recreation impacts is found in Section 3.14, "Public Services and Recreation," of the Final EIR. Implementation of the Sacramento State - Placer Center Master Plan is not projected to result in any significant impacts related to construction of new or physically altered fire (**Impact 3.14-1 and Cumulative**), police (**Impact 3.14-2 and Cumulative**), schools (**Impact 3.14-3 and Cumulative**), or library facilities

(**Impact 3.14-5**) to maintain acceptable service ratios; or related to deterioration of neighborhood or regional parks or require construction or expansion of recreational facilities (**Impact 3.14-4 and Cumulative**).

FINDING

The CSU Board of Trustees finds that, based upon substantial evidence in the record, the project would have less than significant effects related to public services and recreation and no mitigation measures are required.

2.2.14 Transportation

An evaluation of the project's transportation impacts is found in Section 3.15, "Transportation," of the Final EIR. Implementation of the Sacramento State - Placer Center Master Plan is not projected to result in any significant impacts related to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities (**Impact 3.15-1 and Cumulative**); increased hazards due to a geometric design feature (**Impact 3.15-3 and Cumulative**); or inadequate emergency access (**Impact 3.15-4 and Cumulative**).

FINDING

The CSU Board of Trustees finds that, based upon substantial evidence in the record, the project would have less than significant effects related to conflicts with programs/plans; geometric design features; and emergency access and no mitigation measures are required.

2.2.15 Utilities and Service Systems

An evaluation of the project's utilities and service systems impacts is found in Section 3.17, "Utilities and Service Systems," of the Final EIR. Implementation of the Sacramento State - Placer Center Master Plan is not projected to result in any significant impacts related to construction of new or expanded utility infrastructure (**Impact 3.17-1 and Cumulative**); availability of sufficient water supplies (**Impact 3.17-2 and Cumulative**); or generation of solid waste in excess of state or local standards or the capacity of local infrastructure or impairing the attainment of solid waste reduction goals or requirements (**Impact 3.17-4 and Cumulative**).

FINDING

The CSU Board of Trustees finds that, based upon substantial evidence in the record, the project would have less than significant effects related to construction of new or expanded water infrastructure; availability of sufficient water supplies; generation of solid waste in excess of state or local standards or the capacity of local infrastructure; and impairing the attainment of solid waste reduction goals or requirements and no mitigation measures are required.

2.3 POTENTIALLY SIGNIFICANT IMPACTS THAT CAN BE MITIGATED BELOW A LEVEL OF SIGNIFICANCE

Pursuant to Section 21081(a) of the Public Resources Code and Section 15091(a)(1) of the CEQA Guidelines, the CSU Board of Trustees finds that, for each of the following significant effects identified in the Final EIR, changes or alterations have been required in, or incorporated into, the proposed project which mitigate or avoid the identified significant effects on the environment to less than significant levels. These findings are explained below and are supported by substantial evidence in the record of proceedings.

2.3.1 Biological Resources

An evaluation of the potential biological resource impacts of the Sacramento State - Placer Center Master Plan is provided in Section 3.4, "Biological Resources," of the Final EIR. Implementation of the Sacramento State - Placer Center Master Plan could result in conversion of undeveloped habitats resulting in loss of special-status plants if present (**Impact 3.4-1 and Cumulative**); disturbance, injury, or mortality of several special-status wildlife species if present, reduced breeding productivity of these species, and loss of species habitat (**Impact 3.4-2 and Cumulative**); or temporary or permanent degradation or loss of waters of the United States, waters of the state, and their habitat functions and values (**Impact 3.4-3 and Cumulative**).

Mitigation measures to avoid or reduce the environmental effects of the project on biological resources are adopted by the lead agency.

MITIGATION MEASURES

Mitigation Measure 3.4-1: Conduct Special-Status Plant Surveys and Implement Avoidance Measures and Mitigation

- ▶ Before implementation of project-related ground-disturbing activities (e.g., grading, vegetation removal, staging) and during the blooming period for the special-status plant species with potential to occur on the project site (see Table 3.4-5), a qualified botanist shall conduct protocol-level surveys for special-status plants within the project site following survey methods from CDFW's *Protocols for Surveying and Evaluating Impacts on Special-Status Native Plant Populations and Natural Communities* (CDFW 2018 or most recent version). The qualified botanist shall: 1) be knowledgeable about plant taxonomy, 2) be familiar with plants of the Central Valley region, including special-status plants and sensitive natural communities, 3) have experience conducting floristic botanical field surveys as described in CDFW 2018, 4) be familiar with the *California Manual of Vegetation* (Sawyer et al. 2009 or current version, including updated natural communities data at <http://vegetation.cnps.org/>), and 5) be familiar with federal and state statutes and regulations related to plants and plant collecting.
- ▶ If special-status plants are not found, the botanist shall document the findings in a report to the applicant, and no further mitigation shall be required.

Table 3.4-5 Normal Blooming Period for Special-Status Plants That are Known to Occur or May Occur on the Project Site

Species	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Dwarf downingia												
Boggs Lake hedge-hyssop												
Ahart's dwarf rush												
Legenere												
Pincushion navarretia												
Sacramento orcutt grass												
Sanford's arrowhead												

Source: Data compiled by Ascent Environmental in 2022; CNPS 2022.

- ▶ If special-status plants are found during special-status plant surveys and cannot be avoided, the applicant shall, in consultation with CDFW or USFWS, as appropriate depending on species status, develop and implement a site-specific mitigation strategy to compensate for loss of occupied habitat or individuals. Mitigation measures shall include, at a minimum, preserving and enhancing existing populations, establishing populations through seed collection or transplantation from the site that is to be affected, and/or restoring or creating habitat in sufficient quantities to offset loss of occupied habitat or individuals. Potential mitigation sites could include suitable locations within or outside of the project site. Habitat and individual plants lost shall be mitigated at a

minimum 1:1 ratio, considering acreage as well as function and value. Success criteria for preserved and compensatory populations shall include:

- The extent of occupied area and plant density (number of plants per unit area) in compensatory populations shall be equal to or greater than the affected occupied habitat.
- Compensatory and preserved populations shall be self-producing. Populations would be considered self-producing when:
 - plants reestablish annually for a minimum of five years with no human intervention such as supplemental seeding; and
 - reestablished and preserved habitats contain an occupied area and flower density comparable to existing occupied habitat areas in similar habitat types in the project vicinity.
- If off-site mitigation includes dedication of conservation easements, purchase of mitigation credits, or other off-site conservation measures, the details of these measures shall be included in the mitigation plan, including information on responsible parties for long-term management, conservation easement holders, long-term management requirements, success criteria such as those listed above and other details, as appropriate to target the preservation of long-term viable populations.

Species Covered under the PCCP - Western Placer County HCP/NCCP

Mitigation Measure 3.4-2a: Participate in the PCCP, Avoid and Minimize, Mitigate through Payment of Land Conversion and Special Habitat Fees, and Obtain Permitting for Impacts on State and Federally Protected Wetlands through PCCP Participation

Sacramento State shall comply with the PCCP, including the CARP and Western Placer County In-Lieu Fee Program, as a Participating Special Entity.

As of June 2023, the USACE has disclaimed jurisdiction over all of the aquatic resources in the project site (Madrone 2023, Appendix D). If, in the future, USACE determines that the aquatic resources within the project site are subject to their jurisdiction, Sacramento State shall obtain a Letter of Permission from the USACE as outlined in the CARP.

Sacramento State shall obtain Waste Discharge Requirements (WDRs) and/or a 401 Water Quality Certification from the Central Valley Regional Water Quality Control Board (RWQCB) depending on the limit of federal jurisdiction to wetlands and waters of the U.S. in place at the time of project actions. A copy of the WDRs/401 Water Quality Certification shall be provided to the PCA when received. All avoidance and minimization measures specified in the WDRs shall be applied as necessary and appropriate.

Sacramento State shall submit notification to CDFW as required under California Fish and Game Code Section 1602, for impacts on waters of the state, and shall implement the final agreement measures.

As established in agreements between Sacramento State and Placer One (or its successors or assigns), Placer One, or its successors or assigns, shall pay the costs associated with Sacramento State's mitigation of impacts to biological resources and conversion of agricultural lands on the Sacramento State – Placer Center site, either through participation in the PCCP or an individual permitting process with applicable state and federal resource agencies. These fees shall include payment of land conversion fees and special habitats fees (i.e., vernal pool direct effects, vernal pool immediate watershed effects, aquatic/wetland, stream system encroachment) for impacts on state and federally protected wetlands. Through participation in the PCCP and payment of these fees, project-related impacts on state and federally protected wetlands would be offset through the PCCP Reserve System, which is designed to preserve large, intact habitats that are well-connected with each other, including those that contain vernal pools and other state and federally protected wetlands.

Mitigation Measure 3.4-2b: Conduct Preconstruction Surveys for Burrowing Owl Pursuant to the PCCP

- ▶ A qualified biologist shall conduct two surveys within 15 days prior to project-related ground-disturbing activities (e.g., grading, vegetation removal, staging) to establish the presence or absence of burrowing owls. The surveys

shall be conducted at least 7 days apart for both breeding and non-breeding season surveys. If burrowing owls are detected during the first survey, a second survey is not required. All burrowing owls observed shall be counted and mapped.

- ▶ During the breeding season (February 1 to August 31), surveys will document whether burrowing owls are nesting in or within 250 feet of the project area.
- ▶ During the non-breeding season (September 1 to January 31), surveys will document whether burrowing owls are using habitat in or directly adjacent to any area to be disturbed. Survey results will be valid only for the season (breeding or non-breeding) during which the survey was conducted.
- ▶ The qualified biologist will survey the proposed footprint of disturbance in a 250-foot radius from the perimeter of the proposed footprint to determine the presence or absence of burrowing owls. The site will be surveyed by walking line transects, spaced 20 to 60 feet apart, adjusting for vegetation height and density. At the start of each transect and, at least, every 300 feet, the surveyor, with use of binoculars, shall scan the entire visible project area for burrowing owls. During walking surveys, the surveyor will record all potential burrows used by burrowing owls, as determined by the presence of one or more burrowing owls, pellets, prey remains, whitewash, or decoration. Some burrowing owls may be detected by their calls; therefore, observers will also listen for burrowing owls while conducting the survey. Adjacent parcels under different land ownership will be surveyed only if access is granted. If portions of the survey area are on adjacent sites for which access has not been granted, the qualified biologist will get as close to the non-accessible area as possible and use binoculars to look for burrowing owls.
- ▶ The presence of burrowing owl or their sign anywhere on the site or within the 250-foot accessible radius around the site will be recorded and mapped. Surveys will map all burrows and occurrence of sign of burrowing owl on the project site. Surveys must begin 1 hour before sunrise and continue until 2 hours after sunrise (3 hours total) or begin 2 hours before sunset and continue until 1 hour after sunset. Additional time may be required for the large project site.
- ▶ If burrowing owls are found during the breeding season (approximately February 1 to August 31), the following measures shall be implemented:
 - the project applicant shall avoid all nest sites (i.e., burrows or habitat structures that are likely housing a nest, as determined by a qualified biologist) that could be disturbed by covered activities during the remainder of the breeding season or while the nest is occupied by adults or young (occupation includes individuals or family groups foraging on or near the site following fledging).
 - A qualified biologist shall clearly mark (e.g., with flagging or fencing) a 250-foot no-disturbance buffer zone around the nest site(s). Should construction activities cause the nesting bird to vocalize, make defensive flights at intruders, or otherwise display agitated behavior, then the exclusionary buffer shall be increased such that activities are far enough from the nest so that the bird(s) no longer display this agitated behavior. The avoidance area will remain in place until the chicks have fledged or as otherwise determined by the qualified biologist. Covered activities may only occur within the 250-foot buffer zone during the breeding season if a qualified raptor biologist monitors the nest and determines that the activities do not disturb nesting behavior, or the birds have not begun egg-laying and incubation, or that the juveniles from the occupied burrows have fledged and moved offsite. The qualified biologist may use measures such as visual screens to further reduce the size of the avoidance area with Wildlife Agency approval and provided a biological monitor confirms that such measures do not cause agitated behavior.
- ▶ If burrowing owls are detected during the non-breeding season (September 1–January 31), the following measures shall be implemented:
 - A qualified biologist shall clearly mark (e.g., with flagging or fencing) a 160-foot buffer zone around the active burrows. The qualified biologist may use measures such as visual screens to further reduce the size of the avoidance area with Wildlife Agency approval and provided a biological monitor confirms that such measures do not cause agitated behavior.

- During the non-breeding season only, if a project cannot avoid occupied burrows after all alternative avoidance and minimization measures are exhausted, as confirmed by the Wildlife Agencies, a qualified biologist may passively exclude birds from those burrows. A burrowing owl exclusion plan must be developed by a qualified biologist consistent with the most recent guidelines from the Wildlife Agencies (e.g., CDFW 2012) and approved by the Placer Conservation Authority (PCA) and the Wildlife Agencies. Burrow exclusion shall be conducted for burrows located in the project footprint and within a 160-foot buffer zone, as necessary.
- ▶ If burrowing owls are detected during the breeding season or non-breeding season, a biological monitor will be present on the project site daily to ensure that no covered activities occur within the avoidance area. The qualified biologist performing the construction monitoring will ensure that effects on burrowing owls are minimized. If monitoring indicates that construction outside of the avoidance area is affecting nesting, the avoidance area will be increased if space allows (e.g., move staging areas farther away). If space does not allow, construction will cease until the young have fledged from all nests within the avoidance area and beyond the avoidance area where nesting burrowing owls are disturbed by covered activities (as confirmed by a qualified biologist) or until the end of the breeding season, whichever occurs first.

A biological monitor will conduct training of construction personnel on the avoidance procedures, buffer zones, and protocols in the event that a burrowing owl flies into an active construction zone (i.e., outside the buffer zone).

Mitigation Measure 3.4-2c: Conduct Planning Level and Preconstruction Surveys for Swainson's Hawk pursuant to the PCCP

Background Research and Notification

- ▶ One year prior to project-related ground-disturbing activities (e.g., grading, vegetation removal, staging), the applicant shall contact the PCA to confirm with the Program Biologist which areas require Swainson's hawk surveys and to inform when surveys are scheduled.
- ▶ One year prior to project implementation, the applicant shall conduct an updated CNDDDB query for Swainson's hawk and request site-specific occurrence information from the PCA.

Planning Level Surveys

- ▶ One year prior to project-related ground-disturbing activities (e.g., grading, vegetation removal, staging), a qualified biologist shall conduct planning-level surveys between February 1 and September 15 based on the *Swainson's Hawk PCCP Survey Protocols for Projects* (PCA 2022; version 022252022 or most recent version). Planning-level surveys would require up to six surveys during the breeding season depending on detection of active nests.
- ▶ If a nest tree is identified during the planning-level surveys and is planned for removal, early consultation with the PCA and CDFW will begin on removal of that tree outside of the nesting season.
- ▶ In the year of project construction, a qualified biologist shall conduct additional surveys to detect Swainson's hawk nest building, nesting, and fledgling success or failure pursuant to *Swainson's Hawk PCCP Survey Protocols for Projects* (PCA 2022; version 022252022 or most recent version). The Period 4 survey (April 21–June 10) may be replaced by the preconstruction survey, as described below.

Preconstruction Surveys

- ▶ If construction activities (e.g., ground disturbance, staging, tree removal, other vegetation removal) would occur entirely outside of the Swainson's hawk nesting season (i.e., conducted from September 15 to February 1), then preconstruction surveys would not be required.
- ▶ For construction activities during the Swainson's hawk nesting season (February 1 to September 15, or sooner if the PCA determines that Swainson's hawk are nesting earlier in the year), a preconstruction survey shall be conducted no more than 15 days prior to project-related ground-disturbing activities (e.g., grading, vegetation removal, staging) or tree removal. If active construction lapses for more than 15 days, another preconstruction survey for Swainson's hawk activity is required.

Reporting and Buffers

- ▶ The applicant shall provide results of planning level and preconstruction surveys to the PCA after each survey round. Survey results may be grouped into a single report if no activity or nests are detected. If a Swainson's hawk is detected during planning level or preconstruction surveys, the PCA shall be notified immediately.
- ▶ In accordance with the PCCP, all active Swainson's hawk nests will be given a 1,320-foot (0.25 mile) buffer during the nesting season. Project applicants may apply to the PCA for a reduction in the buffer distance.

Construction Monitoring

- ▶ All active nests shall require construction monitoring to ensure that no activity within the buffer zone occurs. Frequency of monitoring will be approved by the PCA and based on frequency and intensity of construction activities. The PCA will consult with agencies on the level of monitoring and frequency that results in the least disturbance to the nest while gauging project activities.

Mitigation Measure 3.4-2d: Conduct Planning Level and Preconstruction Surveys for Tricolored Blackbird pursuant to the PCCP

- ▶ A qualified biologist shall conduct two surveys of foraging habitat within the project site and within a 1,300-foot radius around the project site to determine whether foraging habitat is being actively used by foraging tricolored blackbirds. The qualified biologist shall map foraging habitat, as defined by the land cover types listed above, within a 1,300-foot radius around the project site to delineate foraging habitat that will be surveyed. The surveys shall be conducted approximately one week apart, with the second survey occurring no more than five calendar days prior to project-related ground-disturbing activities (e.g., grading, vegetation removal, staging).
- ▶ Each survey shall last four hours, and begin no later than 8:00 a.m. The qualified biologist shall survey the entire project site and a 1,300-foot radius around the project site by observing and listening from accessible vantage points that provide views of the entire survey area. If such vantage points are not available, the qualified biologist shall survey from multiple vantage points to ensure that the entire survey area is surveyed.
- ▶ In instances where an adjacent parcel is not accessible to survey because the qualified biologist was not granted permission to enter, the qualified biologist shall scan all foraging habitat from the adjacent property, roadsides, or other safe, publicly accessible viewpoints, without trespassing, using binoculars and/or a spotting scope to look for tricolored blackbird foraging activity.
- ▶ The qualified biologist shall map the locations on the site and within a 1,300-foot radius around the project site where tricolored blackbirds are observed and record an estimate of the numbers of tricolored blackbirds observed (estimated by 10s, 100s, or 1,000s), the frequency of visits (e.g., if individuals or a flock makes repeated foraging visits to the site during the survey period), whether tricolored blackbirds are leaving the site with food in their bills, and the direction they fly to/from.
- ▶ Construction activity or other covered activities that may disturb foraging tricolored blackbirds, as determined by a qualified biologist, will be prohibited within 1,300-feet of the foraging site to the extent feasible during the nesting season (March 15 through July 31 or until the chicks have fledged or the colony has been abandoned on its own) if the foraging habitat was found to be actively used by foraging tricolored blackbirds during at least one of the two foraging habitat surveys.
- ▶ If survey results indicate that the area provides marginal foraging habitat (e.g., tricolored blackbirds were observed foraging, but only briefly, and most were not successfully capturing prey), or site-specific conditions may warrant a reduced buffer, the PCA technical staff will consult with the CDFW and USFWS to evaluate whether the project needs to avoid the foraging habitat or whether a reduced buffer may be appropriate. In such cases, additional surveys may be needed to assess site conditions and the value of the foraging habitat.
- ▶ If present, foraging habitat within the 1,300-foot buffer shall be monitored by the qualified biologist(s) to verify that project activity is not disrupting tricolored blackbird foraging behavior. The frequency of monitoring will be approved by the PCA and based on the frequency and intensity of construction activities and the likelihood of

disturbance of foraging tricolored blackbirds. In most cases, monitoring will occur at least every other day, but in some cases, daily monitoring may be appropriate to ensure that effects on tricolored blackbird are minimized.

- ▶ The biologist will train construction personnel on the avoidance procedures and buffer zones.
- ▶ If the qualified biologist(s) determines that project activity is disrupting foraging behavior, the qualified biologist shall notify the project applicant immediately, and the project applicant shall notify the PCA within 24 hours to determine additional protective measures that can be implemented. The qualified biologist(s) shall have the authority to stop project activities until additional protective measures are implemented. Additional protective measures shall remain in place until the qualified biologist(s) determine(s) tricolored blackbird behavior has normalized.
- ▶ If additional protective measures are ineffective, the qualified biologist(s) shall have the authority to stop Covered Activities as needed until the additional protective measures are modified and foraging behavior of tricolored blackbird returns to normal. Additional protective measures may include increasing the size of the buffer (within the constraints of the Project site), temporarily relocating staging areas, or temporarily rerouting access to the Project work area.

Mitigation Measure 3.4-2e: Conduct Surveys for Vernal Pool Branchiopods pursuant to the PCCP

A qualified biologist will conduct wet-season (i.e., that portion of year when precipitation generally occurs, usually in California and Southern Oregon during the period from October to June) surveys for vernal pool fairy shrimp and vernal pool tadpole shrimp in vernal pools and other habitats suitable for these species (e.g., seasonal wetland, seasonal swale, intermittent stream) on the project site following USFWS's 2015 Survey Guidelines (USFWS 2015), with the following exceptions or deviations.

- ▶ If presence is confirmed for vernal pool fairy shrimp and vernal pool tadpole shrimp in an individual vernal pool, surveys may be stopped for that vernal pool.
- ▶ All vernal pools on the project site must be surveyed. Surveys cannot be suspended prior to completion, as otherwise allowed by the Guidelines, if one or more of the six listed large branchiopods identified in the Guidelines is determined to be present.
- ▶ The Guidelines define a complete survey as consisting of one wet-season and one dry-season survey conducted and completed in accordance with the Guidelines within a 3-year period. For the purposes of the PCCP, only one wet-season survey is required; dry-season surveys are not required. Applicants must plan ahead to allow sufficient time to complete these surveys.
- ▶ Data that will be collected at each vernal pool surveyed during the wet season survey will include the presence or absence of vernal pool fairy shrimp and vernal pool tadpole shrimp, species identity and the estimated abundance (10s, 100s, 1,000s) of immature and mature vernal pool fairy shrimp and vernal pool tadpole shrimp present, and the estimated maximum surface area of the vernal pool. Other information on the USFWS data sheet is not required to be collected (i.e., air and water temperature; average and estimated maximum depth of the vernal pool; presence of non-target crustaceans, insects, and platyhelminths; habitat condition). This will allow surveys to be conducted more efficiently, while providing the essential information necessary to calculate the Pool-based Occupancy Rate Standard 9 and the Area-based Occupancy Rate Standard 10. Because these vernal pools will be affected by Covered Activities, collection of additional information is not necessary.
- ▶ Information will be recorded on the PCA-provided data sheet, which will be the USFWS data sheet (included as Appendix A to the Guidelines), modified to include the above information.
- ▶ Voucher specimens will not be collected during wet season surveys unless the identity of the mature shrimp is uncertain and cannot be identified in the field. The Guidelines allow for a limited number of voucher specimens to be collected for each vernal pool. For the purpose of the Plan, the modified survey protocol further limits the collection of voucher specimens to instances where identity is uncertain.

The biologist conducting a survey for vernal pool fairy shrimp and vernal pool tadpole shrimp should participate in the wetland delineation to map the area of each vernal pool. If the biologist cannot participate in the wetland delineation, and the wetland delineation does not provide area for each vernal pool, the biologist will conduct follow-up surveys to map the perimeter of each vernal pool with a global positioning system. Each vernal pool will be given a unique identification number that will be used to track survey data collected during wet-season surveys.

Species Not Covered under the PCCP - Western Placer County HCP/NCCP

Mitigation Measure 3.4-2f: Conduct Surveys for Western Spadefoot and Implement Avoidance Measures

- ▶ Within 48 hours prior to project-related ground-disturbing activities (e.g., grading, vegetation removal, staging), a qualified biologist will conduct focused surveys in aquatic (i.e., vernal pool, wetland) and upland (i.e., VPC grassland within approximately 860 feet (262 meters) habitats of aquatic habitat [Baumberger et al. 2019]) habitats suitable for the species. Burrows considered potentially suitable for western spadefoot toads shall be identified and further examined by a qualified biologist (e.g., with a burrow scope, through hand excavation) to determine whether an adult toad is present in the burrow.
- ▶ If western spadefoot toads are not found, the qualified biologist will submit a report summarizing the results of the survey to the applicant, and further mitigation will not be required.
- ▶ If western spadefoot toads are detected during focused surveys, adults, tadpoles, or egg masses will be relocated to nearby suitable habitat by a qualified biologist with a valid CDFW scientific collecting permit.

Mitigation Measure 3.4-2g: Conduct Focused Surveys for Special-Status Birds, Nesting Raptors, and Other Native Nesting Birds and Implement Protective Buffers

- ▶ To minimize the potential for loss of special-status bird species, raptors, and other native birds, project activities (e.g., tree removal, other vegetation removal, ground disturbance, staging) will be conducted during the nonbreeding season (approximately September 1-January 31, as determined by a qualified biologist), if feasible. If project activities are conducted during the nonbreeding season, no further mitigation will be required.
- ▶ Within 14 days before the onset of project-related ground-disturbing activities (e.g., grading, vegetation removal, staging) or tree removal during the breeding season (approximately February 1 through August 31, as determined by a qualified biologist), a qualified biologist familiar with birds of California and with experience conducting nesting bird surveys will conduct focused surveys for special-status birds, other nesting raptors, and other native birds and will identify active nests within 0.25 mile of the project site.
- ▶ If active nests are not found, the qualified biologist will submit a report summarizing the results of the survey to the applicant, and further mitigation will not be required.
- ▶ If active nests are found, impacts on nesting birds will be avoided by establishing appropriate buffers around active nest sites identified during focused surveys to prevent disturbance to the nest. Project activity will not commence within the buffer areas until a qualified biologist has determined that the young have fledged, the nest is no longer active, or reducing the buffer will not likely result in nest abandonment. A qualified biologist will determine the size of the buffer after a site- and nest-specific analysis. Buffers typically will be 0.25 mile for white-tailed kites, 500 feet for raptors (other than special-status raptors), and 100 feet for non-raptor species. Factors to be considered for determining buffer size will include presence of natural buffers provided by vegetation or topography, nest height above ground, baseline levels of noise and human activity, species sensitivity, and proposed project activities. The size of the buffer may be adjusted if a qualified biologist determines that such an adjustment would not be likely to adversely affect the nest. Any buffer reduction for a special-status species will require consultation with CDFW. Periodic monitoring of the nest by a qualified biologist during project activities will be required if the activity has potential to adversely affect the nest, the buffer has been reduced, or if birds within active nests are showing behavioral signs of agitation (e.g., standing up from a brooding position, flying off the nest) during project activities, as determined by the qualified biologist.

Mitigation Measure 3.4-2h: Conduct Focused Surveys for Monarch Eggs and Larvae

No more than 14 days prior to project-related ground-disturbing activities (e.g., grading, vegetation removal, staging) during the time when milkweed plants could host monarch eggs or caterpillars (approximately mid-March through late September), a qualified biologist shall conduct focused surveys for milkweed plant and inspect these plants for monarch eggs, larvae (i.e., caterpillars), and pupae. If monarch eggs, caterpillars, or pupae are found, the host plants shall be avoided until metamorphosis is completed and adult butterflies emerge and leave the host plant. If no eggs or caterpillars are detected, no additional protection measures are necessary.

Mitigation Measure 3.4-2i: Implement Limited Operating Period or Conduct Focused Surveys for Crotch Bumble Bee

- ▶ Initial ground-disturbing activities (e.g., grading, vegetation removal, staging) shall take place between August 15 and March 15, if feasible, to avoid impacts on nesting Crotch bumble bees.
- ▶ If completing all initial ground-disturbing activities (e.g., grading, vegetation removal, staging) between August 15 and March 15 is not feasible, then a qualified biologist approved by CDFW, familiar with bumble bees of California, with experience using survey methods for bumble bees shall conduct a habitat assessment and focused survey for Crotch bumble bee prior to the start of any ground-disturbing activities, following the methods in Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species (CDFW 2023).
- ▶ The applicant shall submit a survey report to CDFW within one month of survey completion and shall notify CDFW within 24 hours if Crotch bumble bees are detected.
- ▶ If Crotch bumble bees are detected during the focused survey, appropriate avoidance measures shall be implemented. Avoidance measures may include, but not be limited to the following:
 - Protective buffers shall be implemented around active nesting colonies or overwintering queens until these sites are no longer active.
- ▶ If impacts on Crotch bumble bee cannot be avoided, the applicant shall obtain an Incidental Take Permit (ITP) from CDFW and shall implement all avoidance measures included in the ITP.

Mitigation Measure 3.4-2j: Conduct Focused American Badger Survey and Establish Protective Buffers

- ▶ Within 15 days of project-related ground-disturbing activities (e.g., grading, vegetation removal, staging), a qualified wildlife biologist familiar with American badger and experienced using survey methods for the species will conduct focused surveys of habitat suitable for the species within the project site to identify any American badger dens.
- ▶ If occupied dens are not found, the qualified biologist will submit a report summarizing the results of the survey to the applicant, and further mitigation will not be required.
- ▶ If occupied dens are found, impacts on active badger dens will be avoided by establishing exclusion zones around all active badger dens, the size of which will be determined by the qualified biologist. No project activities (e.g., vegetation removal, ground disturbance, staging) will occur within the exclusion zone until denning activities are complete or the den is abandoned, as confirmed by a qualified biologist. The qualified biologist will monitor each den once per week to track the status of the den and to determine when it is no longer occupied. When it is no longer occupied, project activities within the exclusion zone may occur.

Mitigation Measure 3.4-2k: Conduct Focused Bat Surveys and Implement Avoidance Measures

- ▶ As early as possible before project-related ground-disturbing activities (e.g., grading, vegetation removal, staging) or tree removal (e.g., in the early planning stages), a qualified biologist with familiarity with bats and bat ecology and experienced in conducting bat surveys will conduct surveys for bat roosts in trees on the project site.
- ▶ If no evidence of bat roosts is found, the qualified biologist will submit a report summarizing the results of the survey to the applicant, and further study or mitigation will not be required.

- ▶ If evidence of bat roosts is observed, the species and number of bats using the roost will be determined. Bat detectors shall be used if deemed necessary to supplement survey efforts by the qualified biologist.
- ▶ A no-disturbance buffer of 250 feet will be established around active pallid bat roosts, and project activities will not occur within this buffer until after the roosts are unoccupied.
- ▶ If roosts of pallid bat are determined to be present and must be removed, the bats will be excluded from the roosting site before the tree is removed. A program addressing compensation, exclusion methods, and roost removal procedures will be developed in consultation with CDFW before implementation. Exclusion efforts may be restricted during periods of sensitive activity (e.g., during hibernation or while females in maternity colonies are nursing young). The loss of each roost (if any) will be replaced in consultation with CDFW and may require construction and installation of bat boxes suitable to the bat species and colony size excluded from the original roosting site. If determined necessary during consultation with CDFW, replacement roosts will be implemented before bats are excluded from the original roost sites. Once the replacement roosts are constructed and it is confirmed that bats are not present in the original roost site by a qualified biologist, the roost tree may be removed.

Mitigation Measure 3.4-3: Participate in the PCCP, Pay Land Conversion and Special Habitat Fees, and Obtain Permitting for Impacts on State and Federally Protected Wetlands through PCCP Participation

Sacramento State shall comply with the PCCP, including the CARP and Western Placer County In-Lieu Fee Program, as a Participating Special Entity.

As of June 2023, the USACE has disclaimed jurisdiction over all of the aquatic resources in the project site (Madrone 2023, Appendix D). If, in the future, USACE determines that the aquatic resources within the project site are subject to their jurisdiction, Sacramento State shall obtain a Letter of Permission from the USACE as outlined in the CARP.

Sacramento State shall obtain Waste Discharge Requirements (WDRs) and/or a 401 Water Quality Certification from the Central Valley Regional Water Quality Control Board (RWQCB) depending on the limit of federal jurisdiction to wetlands and waters of the U.S. in place at the time of project actions. A copy of the WDRs/401 Water Quality Certification shall be provided to the PCA when received. All avoidance and minimization measures specified in the WDRs shall be applied as necessary and appropriate.

Sacramento State shall submit notification to CDFW as required under California Fish and Game Code Section 1602, for impacts on waters of the state, and shall implement the final agreement measures.

As established in agreements between Sacramento State and Placer One (or its successors or assigns), Placer One, or its successors or assigns, shall pay the costs associated with Sacramento State's mitigation of impacts to biological resources and conversion of agricultural lands on the Sacramento State – Placer Center site, either through participation in the PCCP or an individual permitting process with applicable state and federal resource agencies. These fees shall include payment of land conversion fees and special habitats fees (i.e., vernal pool direct effects, vernal pool immediate watershed effects, aquatic/wetland, stream system encroachment) for impacts on state and federally protected wetlands. Through participation in the PCCP and payment of these fees, project-related impacts on state and federally protected wetlands would be offset through the PCCP Reserve System, which is designed to preserve large, intact habitats that are well connected with each other, including those that contain vernal pools and other state and federally protected wetlands.

FINDING

The CSU Board of Trustees finds that the above mitigation measures are feasible, will reduce the potential biological resources-related impacts of the project to less than significant levels, and are adopted by the CSU Board of Trustees. Accordingly, the CSU Board of Trustees finds that, pursuant to PRC Section 21081(a)(1) and the State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

RATIONALE

Mitigation measures include pre-construction surveys to determine whether sensitive habitat or species are present. If found to be present, mitigation measures would require avoidance (through physical design or seasonal construction windows), participation in the PCCP (i.e., payment of fees for land conversion and special habitat fees), and implementation of measures to avoid disturbance, injury, or mortality of the species. Mitigation measures also include requiring participation in the PCCP and securing permits for impacts on state and federally protected wetlands through the PCCP. Through participation in the PCCP, Placer One, or its successors or assigns, shall pay fees that would contribute to preservation, creation, and restoration of habitats through the PCCP Reserve System, including vernal pool habitat. The PCCP and CARP are designed to provide ecosystem-scale conservation, which includes not only protection of existing habitat, but creation and restoration, as well as long-term management of habitat.

2.3.2 Cultural Resources

An evaluation of the project's impacts related to archaeological resources is found in Section 3.5, "Cultural Resources," of the Final EIR. Results of the records search and pedestrian survey did not identify unique archaeological resources within the project site. Additionally, no unique archaeological resources as defined in PRC Section 21083.2(g) or archaeological resources as defined in State CEQA Guidelines Section 15064.5 were identified during the survey. However, construction-related ground-disturbing activities could result in discovery or damage of yet undiscovered archaeological resources as defined in State CEQA Guidelines Section 15064.5 (**Impact 3.5-1 and Cumulative**).

Mitigation measures to avoid or reduce the environmental effects of the project related to archaeological resources are adopted by the lead agency.

MITIGATION MEASURES

Mitigation Measure 3.5-1: For All Ground-Disturbing Construction Activities, Halt Ground Disturbance Upon Discovery of Subsurface Archaeological Features

In the event that any prehistoric or historic-era subsurface archaeological features or deposits, including locally darkened soil ("midden"), that could conceal cultural deposits are discovered during construction, all ground-disturbing activity within 100 feet of the resource(s) shall be halted and a qualified professional archaeologist shall be retained to assess the significance of the find. If the qualified archaeologist determines the archaeological material to be Native American in nature, Sacramento State shall contact the appropriate Native American tribe for their input on the preferred treatment of the find. If the find is determined to be significant by the archaeologist (i.e., because it is determined to constitute a unique archaeological resource), the archaeologist shall develop, and Sacramento State shall implement, appropriate procedures to protect the integrity of the resource and ensure that no additional resources are affected. Procedures shall include but would not necessarily be limited to preservation in place (which shall be the preferred manner of mitigating impacts to archaeological sites), archival research, subsurface testing, or contiguous block unit excavation and data recovery (when it is the only feasible mitigation, and pursuant to a data recovery plan).

FINDING

The CSU Board of Trustees finds that the above mitigation measures are feasible, will reduce the potential archaeological resources-related impacts of the project to less than significant levels, and are adopted by the CSU Board of Trustees. Accordingly, the CSU Board of Trustees finds that, pursuant to PRC Section 21081(a)(1) and the State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

RATIONALE

The mitigation measure would require the performance of professionally accepted and legally compliant procedures for the discovery and protection of previously undocumented significant archaeological resources.

2.3.3 Geology and Soils

An evaluation of the potential impacts to geology and soils resulting from implementation of the Sacramento State - Placer Center Master Plan is provided in Section 3.7, "Geology and Soils," of the Final EIR. Implementation of the Sacramento State - Placer Center Master could result in the discovery of and disturbance to yet unknown paleontological resources during ground-disturbing activities (**Impact 3.7-3 and Cumulative**).

Mitigation measures to avoid or reduce the environmental effects of the project related to geology and soils are adopted by the lead agency.

MITIGATION MEASURES

Mitigation Measure 3.7-3a: Paleontological Sensitivity Training for Construction Personnel

Prior to construction commencing and before project-related ground-disturbing activities (e.g., grading, vegetation removal, staging) or tree removal, Sacramento State shall retain a qualified paleontologist, as defined by the Society of Vertebrate Paleontology, to train all construction personnel involved with earthwork in those areas. The paleontologist will educate construction workers about the possibility of encountering fossils, the appearance and types of fossils likely to be seen during construction, and the proper stop-work and CSU-approved notification procedures to follow if fossils are encountered. A note to contractors regarding this requirement shall be included on the Improvement Plans.

Mitigation Measure 3.7-3b: Inadvertent Discovery of Potential Paleontological Resources

If a paleontological resource is inadvertently discovered during project-related ground-disturbing activities (e.g., grading, vegetation removal, staging) or tree removal, regardless of the depth of work or location, work must be halted within 30 feet of the find and a qualified paleontologist notified immediately so that an assessment of its potential significance can be undertaken. Coordination with experts on resource recovery and curation of specimens and/or other measures shall be considered, as appropriate, after consultation.

FINDING

The CSU Board of Trustees finds that the above mitigation measures are feasible, will reduce the potential paleontological resources-related impacts of the project to less than significant levels, and are adopted by the CSU Board of Trustees. Accordingly, the Board of Trustees finds that, pursuant to Public Resources Code section 21081(a)(1), and CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project which mitigate or avoid potentially significant effects on the environment identified in the Final EIR.

RATIONALE

Mitigation Measures would reduce potentially significant impacts on undiscovered paleontological resources by providing proper paleontological resource training to construction workers and halting work in the event of an inadvertent discovery. Proper training would ensure that if paleontological resources are encountered, they would be properly identified and avoided or handled appropriately by a qualified professional. In addition, in the event of an inadvertent discovery, halting work and contacting a qualified paleontologist would allow proper avoidance or treatment.

2.3.4 Hydrology and Water Quality

Hydrology and water quality impacts associated with project implementation are evaluated in Section 3.10, "Hydrology and Water Quality," of the Final EIR. Development under the Sacramento State - Placer Center Master Plan would result in an increase in impervious surfaces, which change the rate and timing of stormwater drainage, which could result in erosion, siltation, flooding, and exceedance of adjacent storm drain systems and drainageways. Although project-related low impact development and onsite stormwater detention facilities would reduce stormwater runoff such that peak runoff flow rates are reduced to predevelopment levels, offsite stormwater retention would still be necessary at the planned City of Roseville Pleasant Grove/Curry Creek Reginal Retention Basin. The offsite stormwater retention would accommodate the 100-year, 8-day event. However, this facility is not yet constructed, which results in uncertainty of sufficient stormwater retention (**Impact 3.10-3 and Cumulative**).

Mitigation measures to avoid or reduce the environmental effects of the project on hydrology and water quality are adopted by the lead agency.

MITIGATION MEASURES

Mitigation Measure 3.10-3: Design, Construct, and Maintain Retention Facilities or Pay Retention Mitigation Fees

If the regional retention facility is not sufficiently operational to service the then-existing needs of the Sacramento State – Placer Center, then the final Design Plan and final Drainage Report shall provide details on how stormwater retention requirements will be achieved.

- ▶ Stormwater volumetric increases will be mitigated to retain the increase for the 100-year, 8-day design storm, depth of 10.75 inches at elevation of 200-feet, unless another methodology has been agreed upon by Placer County. The project proponent will provide permanent retention. Retention facilities will be designed in accordance with the requirements of the Placer County Storm Water Management Manual and/or City of Roseville standards that are in effect at the time of submittal, and to the satisfaction of the Engineering and Surveying Division and will be shown in the improvement plans. No retention facility construction will be permitted within any identified wetlands area, floodplain, or right-of-way, except as authorized by project approvals.

FINDING

The CSU Board of Trustees finds that the above mitigation measure is feasible, will reduce the potential impacts of the project on hydrology and water quality to a less than significant level, and is adopted by the CSU Board of Trustees. Accordingly, the CSU Board of Trustees finds that, pursuant to Public Resources Code Section 21081(a)(1), and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project which mitigate or avoid potentially significant effects on the environment identified in the Final EIR.

RATIONALE

The above mitigation measure would reduce impacts on hydrology and water quality by documenting how stormwater retention requirements will be achieved and committing to design and construct such facilities if the regional retention facility is not completed prior to completion of project construction.

2.3.5 Noise

An evaluation of the Sacramento State - Placer Center Master Plan's noise impacts is provided in Section 3.12, "Noise," of the Final EIR. During Sacramento State - Placer Center Master Plan implementation, construction equipment, such as a vibratory roller, would generate vibration during project construction, which would be

perceptible at the nearest sensitive land uses and nearby structures 50 feet from construction (**Impact 3.12-2 and Cumulative**) and noise from the proposed stadium would exceed daytime and nighttime noise standards for Placer County and the City of Roseville (**Impact 3.12-4**).

Mitigation measures to avoid or reduce the environmental effects of the project related to noise are adopted by the lead agency.

MITIGATION MEASURES

Mitigation Measure 3.12-2: Implement Construction-Vibration Reduction Measures for Construction

During all project construction activities Sacramento State shall implement or incorporate the following vibration reduction measures into construction specifications for contractor(s) implementation during project construction, as applicable:

- ▶ Operate all vibration inducing impact equipment as far away from vibration-sensitive sites as reasonably possible from nearby structures.
- ▶ All vibration-inducing activity within 110 feet of sensitive receptors shall be monitored and documented for ground vibration noise and vibration noise levels at the nearest sensitive land use and associated recorded data submitted to Placer County so as not to exceed 80 VdB.
- ▶ Limit construction hours for equipment with high vibratory levels (i.e., vibratory roller, dozing, drilling) to daytime hours from 7:00 a.m. to 7:00 p.m. Monday through Friday, and 8:00 a.m. to 8:00 p.m. Saturday and Sunday.

Mitigation Measure 3.12-4: Implement Stadium and Athletic Field Noise Control Measures

The following measures shall be implemented as part of the Project to reduce stadium and athletic field noise:

- ▶ The stadium shall be designed with an amplification system to incorporate all feasible acoustical features, such as amplifying sound away from the nearest residences.
- ▶ Amplification shall be limited at the stadium to be no louder than 100 dBA measured 5 feet from the source.
- ▶ Outdoor events and activities that do not require use of amplified sound (for speech or music) may be held between 7:00 a.m. and midnight, Monday through Sunday. Use of the University's scheduling protocols is encouraged, to facilitate coordination with other events and among potential campus service providers. Regardless of the time they are held, events and activities must be conducted in conformity with any additional guidelines pertinent to a particular venue.
- ▶ All campus events and activities shall be conducted consistent with Federal and State law, with existing University policies, with the orderly conduct of University business, with preservation of the campus learning environment, with the preservation of public safety, with maintenance of University property and with the free flow of pedestrian and vehicular traffic. Entrances to campus facilities shall not be obstructed. No individual or group shall abridge, halt or disrupt the right of others to present their views. In addition, plans for outdoor events and activities should address potential impacts on residential communities, on and off campus.

FINDING

The CSU Board of Trustees finds that the above mitigation measures are feasible, will reduce the potential impacts of the project related to noise to less than significant levels, and are adopted by the CSU Board of Trustees. Accordingly, the CSU Board of Trustees finds that, pursuant to Public Resources Code section 21081(a)(1), and CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project which mitigate or avoid potentially significant effects on the environment identified in the Final EIR.

RATIONALE

The above mitigation measures would reduce vibration by locating equipment as far away from receptors as possible, monitoring vibration during construction, and reducing vibration exposure to daytime hours. The maximum acceptable vibration standard of 80 VdB for residential uses is based on human response to sleep disturbance. Therefore, limiting construction with vibratory rollers to daytime hours and ensuring construction activity within 110 feet of sensitive receptors is monitored an exceedance of 80 VdB during nighttime hours and sleep disturbance would not occur. In addition, limiting amplified noise to 100 dBA L_{eq} at 5 feet from the source would result in noise levels of approximately 41 dBA L_{eq} at 1,150 feet. Noise from amplified equipment would not exceed the Placer County daytime noise standard (i.e., 55 dBA L_{eq}), Placer County and City of Roseville nighttime standard (i.e., 45 dBA L_{eq}), and City of Roseville daytime noise standard (i.e., 50 dBA L_{eq}) at nearby sensitive receptors.

2.3.6 Tribal Cultural Resources

An evaluation of the Sacramento State - Placer Center Master Plan's tribal cultural resources impacts is provided in Section 3.16, "Tribal Cultural Resources," of the Final EIR. Although consultation and the NCIC and NAHC record searches did not result in the identification of any tribal cultural resources, UAIC identified the Sacramento State – Placer Center Master Plan site to be sensitive for tribal cultural resources (**Impact 3.16-1 and Cumulative**).

Mitigation measures to avoid or reduce the environmental effects of the project related to tribal cultural resources are adopted by the lead agency.

MITIGATION MEASURES

Mitigation Measure 3.16-1a: Tribal Cultural Resource Awareness Training

Before initiation of ground-disturbing activities, all construction crew members, consultants, and other personnel involved in project-related ground-disturbing activities (e.g., grading, vegetation removal, staging) shall receive project-specific tribal cultural resources awareness training. The training shall be conducted in coordination with qualified cultural resource specialists and representatives from UAIC. The training will emphasize the requirement for confidentiality and culturally appropriate, respectful treatment of any find of significance to UAIC.

As a component of the training, a brochure will be distributed to all personnel associated with project-related ground-disturbing activities (e.g., grading, vegetation removal, staging). At a minimum, the brochure shall discuss the following topics in clear and straightforward language:

- ▶ field indicators of potential archaeological or cultural resources (e.g., what to look for; for example: archaeological artifacts, exotic or nonnative rock, unusually large amounts of shell or bone, significant soil color variation);
- ▶ regulations governing archaeological resources and tribal cultural resources;
- ▶ consequences of disregarding or violating laws protecting archaeological or tribal cultural resources; and
- ▶ steps to take if a worker encounters a possible resource.

The training shall include project-specific guidance for on-site personnel, including agreed upon protocols for resource avoidance, when to stop work, and whom to contact if potential archaeological or tribal cultural resources are identified.

The training shall also address directing work to stop and contacting the County coroner and the NAHC immediately if potential human remains are identified. NAHC will assign an MLD if the remains are determined by the coroner to be Native American in origin.

Mitigation Measure 3.16-1b: Unanticipated Discovery of Tribal Cultural Resources

If any suspected tribal cultural resources, including midden soil, artifacts, chipped stone, exotic rock (nonnative), or unusual amounts of baked clay, shell, or bone, are discovered during ground disturbing construction activities, all work shall cease within 100 feet of the find. The appropriate UAIC tribal representative(s) shall be immediately notified and shall determine if the find is a tribal cultural resource (pursuant to PRC Section 21074). The tribal representative will make recommendations for further evaluation and treatment, as necessary.

Preservation in place is the preferred impact minimization approach under CEQA and the Tribes' protocols, and every effort shall be made to preserve the resources in place, including through project redesign. 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, returning objects to a location within the project vicinity where they will not be subject to future impacts. The Tribe does not consider curation of tribal cultural resources to be appropriate or respectful and request that materials not be permanently curated, unless approved by the Tribe.

Mitigation Measure 3.16-1c: Tribal Monitoring (Additional Commitment Above And Beyond The Mitigation Requirement)

Coordination between UAIC and Sacramento State did not identify the need for tribal monitors to be present during project-related ground-disturbing activities (e.g., grading, vegetation removal, staging). However, during the County's consultation with UAIC as part of the SAP/PRSP EIR, an area within the PRSP area was identified by the tribe as having the potential for significant cultural finds based on the presence of multiple surface isolates. The area identified overlaps with a portion of the project site. Therefore, although this measure is not necessary to reduce impacts below the threshold of significance, the following commitment is included in this Draft EIR.

At least 14 calendar days before commencement of project-related ground-disturbing activities (e.g., grading, vegetation removal, staging) in the area identified by UAIC during coordination with the County, the UAIC shall be contacted to request a tribal site monitor. The monitor shall identify any "Environmentally Sensitive Areas" by creating a site boundary and demarcation. In these areas, the project proponent and/or its construction contractor(s) shall accommodate Native American monitors or their representatives on the construction site during ground-disturbing activities, including vegetation clearing, grubbing, and stripping or other earth-moving/disturbing activities, such as grading or excavation. Native American monitors or their representatives will have the authority to request that work be temporarily stopped, diverted, or slowed if sites or objects of significance are identified within 100 feet of the direct impact area. Only a Native American monitor or representative shall recommend appropriate treatment and final disposition of TCRs. If the request for a tribal monitor was issued as specified and Native American monitors are not available at the start of ground-disturbing activities, construction activities may proceed.

FINDING

The CSU Board of Trustees finds that the above mitigation measures are feasible, will reduce the potential impacts of the project related to tribal cultural resources to less than significant levels, and are adopted by the CSU Board of Trustees. Accordingly, the CSU Board of Trustees finds that, pursuant to Public Resources Code section 21081(a)(1), and CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project which mitigate or avoid potentially significant effects on the environment identified in the Final EIR.

RATIONALE

Implementation of Mitigation Measures 3.16-1a and b would reduce impacts associated with tribal cultural resources to a less than significant level by requiring appropriate worker training and treatment and proper care of significant tribal cultural resources, in the case of a discovery. While Mitigation Measure 3.16-1c is not necessary to reduce potential impacts to tribal cultural resources to less than significant levels and was not identified during AB 52 consultation, it is included in the Final EIR as an additional commitment by Sacramento State to ensure consistency with the County's commitments to the tribe.

2.3.7 Utilities and Service Systems

An evaluation of impacts to utilities and service systems is provided in Section 3.17, "Utilities and Service Systems," of the Final EIR. Sacramento State – Placer Center would increase demand for wastewater treatment. At buildout, the off-campus center is estimated to have an annual wastewater generation rate of 0.125 mgd. The *Placer Ranch Specific Plan Sanitary Sewer Master Plan* indicated that the estimated average dry weather flow (ADWF) for the University land use included in the PRSP would be 0.58 mgd. While the Pleasant Grove Wastewater Treatment Plant (PGWWTP) treatment capacity to 12 mgd has sufficient remaining capacity to serve the project, the plant would not have sufficient capacity to treat the ultimate wastewater flows of 5.77 mgd ADWF from buildout of the SAP/PRSP areas. Although the project is planned as an early phase of development within the PRSP, wastewater treatment services are provided on a first-come, first-served basis. Additional expansion(s), new NPDES permit(s), and/or other treatment alternatives may be required prior to buildout of the project (**Impact 3.17-3**).

Mitigation measures to avoid or reduce the environmental effects of the project on utilities and service systems are adopted by the lead agency.

MITIGATION MEASURES

Mitigation 3.17-3: Confirm Wastewater Conveyance and Treatment Infrastructure Capacity

Prior to improvement plan approval for each development phase of the project, Sacramento State shall receive confirmation from Placer County, SPWA, and the City of Roseville that there is sufficient conveyance infrastructure and treatment capacity to serve the final design plan flows for the proposed off-campus center. As proportionally appropriate, Sacramento State shall participate financially in the construction of additional wastewater treatment capacity sufficient to accommodate projected flows through payment of connection fees facilitated through annexation into a new sewer maintenance zone to be created by Placer One. Sacramento State shall also obtain approval by the SPWA for expansion of the service area boundary. It is understood that Sacramento State must rely on the City of Roseville (on behalf of the SPWA partners) to construct the wastewater treatment expansion needed to treat and discharge wastewater produced within the PGWWTP service area boundary, including buildout of the net SAP and PRSP areas.

FINDING

The CSU Board of Trustees finds that the above mitigation measure is feasible, will reduce the potential impacts of the project on wastewater conveyance and treatment infrastructure to less than significant levels, and are adopted by the CSU Board of Trustees. Accordingly, the CSU Board of Trustees finds that, pursuant to Public Resources Code section 21081(a)(1), and CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project which mitigate or avoid potentially significant effects on the environment identified in the Final EIR.

RATIONALE

Implementation of this mitigation measure requires the expansion of treatment capacity at the PGWWTP and expansion of the SPWA Regional Service Area Boundary to accommodate wastewater flows generated by development of the project. Expansion of the PGWWTP was identified as part of the Wastewater Master Plan EIR (WWMP EIR) and West Roseville Specific Plan EIR (WRSP EIR). The WWMP EIR identified expansion of the PGWWTP to treat and discharge up to 29.5 mgd ADWF (City of Roseville 1996:2-10, 2-34 and 2-35). The WRSP EIR also analyzed expanding the PGWWTP onto a 20-acre city-owned parcel on the south side of the PGWWTP to treat and discharge up to 24.7 mgd ADWF (City of Roseville 2004:4.11-70 through 4.11-75). Sacramento State is required to pay its fair share of the costs of the PGWWTP expansion, and any applicable costs associated with additional environmental review and mitigation measures, through the payment of sewer connection fees. If the capacity expansion cannot be completed in time to serve the project at buildout, then development may continue until

existing capacity has been exhausted and the remaining development shall be curtailed until sufficient wastewater treatment and discharge capacity becomes available. Implementation of Mitigation Measure 3.17-3 would reduce the impact on demand for wastewater treatment capacity to a less than significant level because the measure would ensure that sufficient treatment capacity is available at the PGWWTP.

2.4 SIGNIFICANT IMPACTS THAT CANNOT BE MITIGATED BELOW A LEVEL OF SIGNIFICANCE

This section identifies the significant unavoidable impacts that require a statement of overriding considerations to be issued by the CSU Board of Trustees, pursuant to Section 15093 of the CEQA Guidelines, if the project is approved. Based on the EIR analysis, the following impacts have been determined to be significant and unavoidable:

2.4.1 Aesthetics - Create a New Source of Substantial Light That Adversely Affects Nighttime Views (Project and Cumulative)

An evaluation of the project's impacts related to aesthetics is found in Section 3.1, "Aesthetics," of the Final EIR. Implementation of the Sacramento State - Placer Center Master Plan would introduce new sources of light and glare associated with new buildings and facilities, and new lighting that would affect nighttime views and result in additional skyglow (**Impact 3.1-2**). In addition, an evaluation of the potential cumulative impacts of the Sacramento State - Placer Center Master Plan to aesthetics is found in Chapter 4, "Cumulative Impacts," of the Final EIR. Collectively, past, present, and probable future projects result in a cumulatively significant impact related to nighttime lighting. Implementation of the Sacramento State - Placer Center Master Plan would contribute new sources of light and glare.

MITIGATION MEASURES

Mitigation 3.1-2: Shield and Angle Nighttime Construction Lighting Downwards

Before issuance of grading or building permits for the project, a note shall be identified on the grading or other improvement plans requiring construction managers or contractors to include shielding on all nighttime lighting used for construction activities and angle all such lighting downwards.

FINDING

The CSU Board of Trustees finds that implementation of the identified mitigation measure will reduce construction-related impacts on nighttime lighting attributable to the proposed project. Moreover, pursuant to Public Resources Code Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, project design which will reduce, to the extent feasible, significant operational lighting impacts attributable to the project, including those related to the stadium, as discussed in the Final EIR. However, there are no additional feasible mitigation measures that will reduce the significant nighttime lighting impacts to a level below significant. Therefore, this impact would remain significant and unavoidable at the project and cumulative levels. However, pursuant to Public Resources Code Section 21081(b), specific economic, legal, social, technological, and other benefits of the project would outweigh this significant and unavoidable impact. See Statement of Overriding Considerations.

RATIONALE

In accordance with Section 15370 of the State CEQA Guidelines, Sacramento State would reduce light pollution from temporary nighttime construction lighting and new lighting for the off-campus center (Mitigation Measure 3.1-2). However, the quantity of new lighting at buildout of Sacramento State – Placer Center would add a substantial source

of nighttime lighting to the region. The project includes implementation of all feasible light control measures per the CALGreen Code, the CSU Outdoor Lighting Design Guide, and other policies. No other feasible mitigation is available to prevent the overall amount of light generated by the project from affecting nighttime views. Therefore, the impact of nighttime lighting would be significant and unavoidable at the project and cumulative level.

2.4.2 Air Quality – Operational Emissions (Project and Cumulative)

An evaluation of the project's impacts to air quality is found in Section 3.3, "Air Quality," of the Final EIR. Operation of Sacramento State – Placer Center would generate emissions of ROG and NO_x, which are precursors to ozone, and PM₁₀ that exceed the applicable mass emission thresholds recommended by PCAPCD. Thus, long-term operational emissions of ROG, NO_x, and PM₁₀ could conflict with the air quality planning efforts and contribute substantially to the nonattainment status of SVAB with respect to the NAAQS and CAAQS for ozone and the CAAQS for PM₁₀. Because PM_{2.5} is a subset of PM₁₀, it is anticipated that operational emissions of PM_{2.5} could contribute to the nonattainment status of the SVAB with respect to the NAAQS for PM_{2.5}. Furthermore, the project-related net increase in criteria air pollutants could result in adverse health impacts (**Impact 3.3-3**). This impact would be significant and unavoidable.

Several cumulative projects are large-scale developments in close enough proximity (e.g., SAP/PRSP, Amoruso Ranch, Creekview Specific Plan, West Roseville Specific Plan, Whitney Ranch, Twelve Bridges Specific Plan, and Lincoln Village 5) such that localized PM₁₀ and PM_{2.5} effects could occur. Operational PM₁₀ and PM_{2.5} are less likely to result in local cumulative impacts as operational sources of PM₁₀ and PM_{2.5} tend to be spread throughout the region (i.e., vehicles traveling on roads), not affecting any one receptor. Therefore, emissions of ROG, NO_x, PM₁₀, and PM_{2.5} from cumulative development are significant in the air basin. The project's contribution to the nonattainment status of the SVAB with respect to the CAAQS and NAAQS would be cumulatively considerable.

MITIGATION MEASURES

Mitigation Measure 3.3-3a: Implement Mitigation Measure 3.15-1: Develop and Implement a Transportation Demand Management Program

Implementation of Mitigation Measure 3.15-1 requires the development of a Transportation Demand Management (TDM) program, which includes VMT and trip reduction strategies that in turn would include periodic assessments to gauge progress towards achieving the CSU's adopted VMT thresholds.

Mitigation Measure 3.3-3b: Low-Volatile Organic Compound Coatings During Operations

To reduce VOC emissions from painting activities during reapplication over the life span of Sacramento State - Placer Center buildings and facilities, the project proponents/operator and/or its contractor(s) shall use coatings with VOC ratings that are lower than the requirements of PCAPCD Rule 218. Prior to the commencement of reapplication of coatings for any facility or buildings, the construction contractor(s) shall submit a list of coatings to be used, their respective VOC content, and a summary of surface area to be painted to Sacramento State, including documentation that the proposed coatings exceed VOC limits established by PCAPCD based on the current requirements at that time.

Mitigation Measure 3.3-3c: Purchase ROG, NO_x, and PM₁₀ offsets through PCAPCD's Off-Site Air Quality Mitigation Fund

Sacramento State shall implement off-site mitigation in accordance with PCAPCD guidance such that the project's operational emissions of ROG, NO_x, and PM₁₀ that exceed PCAPCD's threshold of 55 lbs/day and 82 lbs/day (for one year of operation) are reduced to their respective thresholds. For purposes of this measure, that is equivalent to 39.4 tons of ROG, 14.0 tons of NO_x, and 53.5 tons of PM₁₀ (see Table 3.3-9 for calculations). The off-site mitigation measure for criteria pollutant emissions shall be implemented by one of the following methods:

- ▶ CSU may develop or participate in their own off-site mitigation project or locally available one, so long as it is verified by PCAPCD and the proposed project will result in an equivalent emission reduction identified by this measure, or
- ▶ CSU can pay a mitigation fee, which is calculated based on the anticipated emission reduction needed and cost-effectiveness identified by CARB's most current Carl Moyer Program Guidance (i.e., \$18,262 per ton: see Table 3.3-9 for fee calculation) (PCAPCD 2017:1).

Table 3.3-9 Mitigation Fee Calculation

	Unmitigated Emissions (lbs/day)	Threshold (lbs/day)	Needed Mitigation (lbs/day)	Needed Mitigation (tons/year)	Mitigation Fee (dollars)
ROG	271	55	216	39.4	
NO _x	132	55	77	14.0	
PM ₁₀	375	82	293	53.5	
Mitigation Fee:				106.9	\$1,953,030

Notes: ROG= reactive organic compounds; NO_x= oxides of nitrogen; PM₁₀= fine particulate matter; lbs=pounds.

The applicable fee rates change over time. As of August 2023, the fee rate is \$18,262 per ton. Applying this fee to the project's unmitigated emissions results in a total fee of \$1,953,030 (Table 3.3-9).

At the time of individual development applications, and prior to building occupancy/operation for any future building to be constructed, Sacramento State shall reassess the mitigation fee based on project-specific operations and more specific details pertaining to the level of on-site mitigation measures incorporated into the project. The actual amount to be paid shall be determined and satisfied per CARB guidelines and in coordination with PCAPCD, prior to occupancy/operation of any Sacramento State - Placer Center facilities.

To satisfy this mitigation requirement, Sacramento State shall hire a qualified professional to quantify on-site and off-site operational criteria air pollutants and ozone precursors and shall provide substantial evidence to PCAPCD for approval. Based on this refined analysis, if operational emissions still exceed PCAPCD thresholds of significance, the mitigation fee shall be recalculated based on the cost to mitigate ozone precursors at that time. Further, realizing that the Master Plan may not be fully built out until 2060, the specific mitigation measures/programs available (on site or off site), including the cost, quantity, and mitigation potential of such, could vary as new technologies become available and local programs develop. As these programs are developed and as they become available in the future, Sacramento State may apply new or additional mitigation measures to satisfy this mitigation, so long as they meet PCAPCD mitigation requirements and demonstrate equal or more effectiveness than this measure to ensure operational emissions meet adopted PCAPCD daily thresholds.

FINDING

The CSU Board of Trustees finds that implementation of the identified mitigation measures will reduce operational emissions of criteria air pollutant and precursor emissions impacts attributable to the proposed project. Pursuant to Public Resources Code Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project which will mitigate, in part, this significant air quality impact attributable to the project, as identified in the Final EIR. However, there are no feasible mitigation measures that will reduce the identified significant impact to a level below significant. Therefore, this impact would remain significant and unavoidable at the project and cumulative level. However, pursuant to Public Resources Code Section 21081(b), specific economic, legal, social, technological, and other benefits of the project would outweigh this significant and unavoidable impact. See Statement of Overriding Considerations.

RATIONALE

Implementation of Mitigation Measure 3.3-3a would reduce operational emissions associated with mobile sources by implementing trip and VMT-reducing measures, which would be assessed on an ongoing basis to ensure VMT reduction targets are achieved. Mitigation Measure 3.3-3b would reduce off-gassing emissions associated with reapplication of architectural coatings on buildings campus wide, by required the use of low-VOC containing paints. Off-gassing emissions are directly correlated to the VOC concentration (in grams per liter of pain); thus, using paints that have a lower VOC content correlates directly to a lower off-gassing emissions of VOCs. Finally, per Mitigation Measure 3.3-c, additional reductions may be required that can be achieved through contributing monetarily to current (and future) offset programs that PCAPCD implements, or locally or applicant-sponsored programs. An example of an offset program is the current woodstove changeout program where funds are used to generate rebates and subsidies to assist people to replace current woodstoves with higher efficient EPA-rated clean burning stoves that reduce PM and NOx emissions. An offset as a mitigation strategy is effective when all the proper mechanisms are in place that ensure proper accounting is taking place, emissions quantification is accurate, the reduction strategy is enforced and implemented, and the offsets themselves are available. Given the long-term buildout of the project and the relatively large number of offsets that could potentially be required to achieve reductions equal to PCAPCD's thresholds over the life of the project, it cannot be guaranteed at this time that offsets would be available in the amount needed to reduce ROG, NOx, and PM10 to levels necessary. Therefore, this impact would be significant and unavoidable at the project and cumulative level.

2.4.3 Air Quality - Objectionable Odors (Project and Cumulative)

An evaluation of the project's impacts to air quality is found in Section 3.3, "Air Quality," and evaluation of the potential cumulative odor impacts of the Sacramento State - Placer Center Master Plan is found in Chapter 4, "Cumulative Impacts," of the Final EIR. Construction activities and the odors they generate would be temporary and intermittent. New odor sources would be subject to PCAPCD's Rule 205, which regulates nuisances from odors. Sacramento State – Placer Center would not introduce large stationary sources of diesel-powered equipment, would reduce its contribution of waste to the Western Regional Sanitary Landfill through waste-reduction measures, and would not create objectionable odors affecting a substantial number of people.

The Western Regional Sanitary Landfill is located approximately 1,000 feet north of the northwest portion of the project site. Although the off-campus center would implement waste-reduction measures, it would generate solid waste that would contribute to this landfill, which could exacerbate odors from the landfill. The proposed on-campus housing would be located approximately 4,000 feet from the landfill property line. The Placer County General Plan establishes a 2,000-foot buffer around the landfill for residential development, or 1,000 feet with the approval of a specific plan, master plan, or development agreement. Sacramento State – Placer Center would be consistent with (outside of) these buffers.

Nonetheless, based on past data regarding nuisance complaints from residents greater than one mile distant from the landfill, it is possible that new residents, students, faculty, or staff within the project site, as well as residents in communities a mile or more from the landfill, may periodically complain about odors from the landfill. Such complaints could create pressure for the Western Placer Waste Management Authority to implement additional odor control and reduction measures at the landfill and, absent measures to control odors at the source and/or at receptors, could interfere with the ability of the landfill to expand or modify needed operations. Because waste generated by the project would exacerbate potential odor impacts on residents of other communities, as well as residents of the project site, the impact related to the consistency and compatibility of the proposed Sacramento State – Placer Center with the Western Regional Sanitary Landfill would be significant and unavoidable at the project (**Impact 3.3-6**) and cumulative level.

MITIGATION MEASURES

No mitigation measures are available.

FINDING

Pursuant to Public Resources Code Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project which will mitigate, in part, this significant odor impact attributable to the project. Those changes or alterations are within the responsibility and jurisdiction of another public agency (the WRSL) and have been adopted and implemented by the WRSL. However, there are no feasible mitigation measures that will reduce the identified significant impact to a level below significant. Therefore, this impact would remain significant and unavoidable at the project and cumulative level. However, pursuant to Public Resources Code Section 21081(b), specific economic, legal, social, technological, and other benefits of the project would outweigh this significant and unavoidable impact. See Statement of Overriding Considerations.

RATIONALE

Although the project site would not violate local land use buffer requirements, the project site would be within the PCAPCD-recommended 1-mile buffer for landfills, within a distance to the landfill where odor complaints currently occur. Thus, because the project would contribute solid waste to the WRSL, which could potentially exacerbate odors, and would result in the placement of new people working and residing near a landfill, the potential for odor complaints to increase exists.

As discussed in Impact 3.3-6 of the Final EIR, the WRSL is now operating under an odor control plan that implements odor control technologies, systems for tracking and monitoring odors, and procedures for investigating and responding to odor complaints. The WRSL has implemented the appropriate control measures and is actively coordinating with the PCAPCD to reduce the potential for odor nuisances to the surrounding community to the extent feasible. In addition, the approved landfill expansion project includes a list of odor reduction measures in its design, and the EIR for the landfill expansion identified additional mitigation measures, which, the EIR ultimately concluded, would not reduce the odor impacts resulting from the expansion to a less than significant level. Consistent with the conclusion in the landfill expansion EIR and the SAP/PRSP EIR, there are no additional mitigation measures available to reduce odor-related impacts associated with the landfill.

2.4.4 Noise - Temporary Construction Noise (Project and Cumulative)

An evaluation of the project's noise impacts is found in Section 3.12, "Noise," of the Final EIR. Implementation of the Sacramento State - Placer Center Master Plan would result in construction activities associated with the development of facilities to accommodate projected student enrollment and furtherance of the University's academic mission. Although construction activities would be intermittent and temporary, construction noise could reach high levels at nearby noise-sensitive land uses and could result in human disturbance (**Impact 3.12-1**). This impact is significant and unavoidable at the project and cumulative level.

MITIGATION MEASURES

Mitigation 3.12-1: Implement Construction-Noise Reduction Measures for Daytime and Nighttime Construction

During all project construction activities, Sacramento State shall implement or incorporate the following noise reduction measures into construction specifications, which contractor(s) shall implement during project construction, as applicable:

- ▶ All construction equipment and equipment staging areas shall be located as far as possible from nearby noise-sensitive land uses.
- ▶ Idling of construction equipment for extended periods (i.e., 5 minutes) of time shall be prohibited.

- ▶ All construction equipment shall be properly maintained and equipped with noise reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations. Equipment engine shrouds shall be closed during equipment operation.
- ▶ All construction equipment with backup alarms shall be equipped with either audible self-adjusting backup alarms or alarms that only sound when an object is detected. The self-adjusting backup alarms shall automatically adjust to 5 dBA over the surrounding background levels. All non-self-adjusting backup alarms shall be set to the lowest setting required to be audible above the surrounding noise levels. In addition to the use of backup alarms, the construction contractor shall consider other techniques such as observers and the scheduling of construction activities such that alarm noise is minimized.
- ▶ Individual operations and techniques shall be replaced with quieter procedures (e.g., using welding instead of riveting, mixing concrete off site instead of on site) where feasible and consistent with building codes and other applicable laws and regulations.
- ▶ Combine noisy operations (e.g., riveting, cutting, hammering) to occur in the same time period (e.g., day or construction phase), such that the overall duration of these activities is reduced to the extent practical. By performing the noisiest operations together within the same time period, the overall duration that excessive noise would occur is reduced, minimizing the disturbing effects of exposure to prolonged increased noise levels.
- ▶ When noise sensitive uses are close (i.e., 3,000 feet) noise attenuating buffers such as structures, truck trailers, temporary noise curtains or sound walls, or soil piles shall be located between noise sources and the receptor to shield sensitive receptors from construction noise.
- ▶ The contractor shall designate a disturbance coordinator and post that person's telephone number conspicuously around the construction site and provide to nearby residences. The disturbance coordinator shall receive all public complaints and be responsible for determining the cause of the complaint and implementing any feasible measures to alleviate the problem.

FINDING

The CSU Board of Trustees finds that implementation of the identified mitigation measures will reduce impacts from temporary (construction) noise attributable to the proposed project. Pursuant to Public Resources Code Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project which will mitigate, in part, this significant noise impact attributable to the project, as identified in the Final EIR. However, there are no feasible mitigation measures that will reduce the identified significant impact to a level below significant. Therefore, this impact would remain significant and unavoidable at the project and cumulative level. However, pursuant to Public Resources Code Section 21081(b), specific economic, legal, social, technological, and other benefits of the project would outweigh this significant and unavoidable impact. See Statement of Overriding Considerations.

RATIONALE

Implementation of Mitigation Measure 3.12-1 would reduce noise by locating equipment as far away from receptors as possible, requiring the proper use of available noise-reduction equipment, including use of alternatively powered equipment, exhaust mufflers, engine shrouds, and equipment enclosures. Implementation of these noise-reduction features can reduce construction noise levels by approximately 10 dBA, or more (NCCHP 1999). With mitigation, construction-generated noise levels would be substantially reduced to 76 to 78 dBA L_{eq} at the nearest sensitive receptors 50 feet south of the site. However, construction noise would still exceed ambient levels by 5 dBA or more. Additionally, with implementation of Mitigation Measure 3.12-1, if construction occurred outside of allowed hours at nighttime, construction noise would exceed the City and County nighttime noise threshold of 45 dBA L_{eq} . In such instances, construction noise would be distinctly perceptible at nearby sensitive land uses. This impact would be significant and unavoidable at the project and cumulative level.

2.4.5 Noise - Long-Term Traffic Noise (Project and Cumulative)

An evaluation of the project's noise impacts is found in Section 3.12, "Noise," of the Final EIR. Implementation of the Sacramento State - Placer Center Master Plan would result in new and expanded roadways to serve development on the project site, as well as long-term traffic and associated noise increases on impacted roadways. Existing single family residential development along Diamond Woods Circle would be exposed to future substantial traffic noise from the proposed extension of Foothill Boulevard that would exceed maximum allowable standards. Additionally, existing church along Foothills Boulevard would be exposed to traffic noise increases that exceed maximum allowable standards. Traffic on three roadway segments would also result in an increase in traffic noise of more than 5 dBA (**Impact 3.10-3**). This impact is significant and unavoidable at the project and cumulative level.

MITIGATION MEASURES

With the exception of one segment on Fiddymont Road in the City of Roseville, all roadways along which adverse traffic noise impacts would occur are located within Placer County. Therefore, although features such as sound walls along affected roadways and roadway design features could be implemented to reduce traffic noise, the CSU does not have jurisdiction in Placer County or the City of Roseville such that it could require implementation of such traffic noise reduction features. Nonetheless, it is reasonable to assume that mitigation from the SAP/PRSP EIR would be implemented throughout buildout of the SAP/PRSP area to reduce traffic noise. Mitigation Measure 4.11-5a from the SAP/PRSP EIR requires design-level acoustical studies to identify specific roadway design considerations to reduce traffic noise; Mitigation Measure 4.11-5b requires coordination with the City of Roseville to ensure that new roadways and roadway extensions incorporate design features to reduce traffic noise; and Mitigation Measure 4.11-5c requires design-level acoustical studies for noise sensitive land uses within areas determined to have noise levels exceeding County standards to implement recommendations for building placement and design to reduce traffic noise.

FINDING

The CSU Board of Trustees finds that implementation of the identified mitigation measures will reduce impacts from traffic noise attributable to the proposed project. Pursuant to Public Resources Code Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project which will mitigate, in part, this significant noise impact attributable to the project, as identified in the Final EIR. Those changes or alterations are within the responsibility and jurisdiction of another public agency and such changes have been adopted by such other agency, or can and should be adopted by such other agency. Because the CSU does not have jurisdiction in Placer County or the City of Roseville to require implementation of such traffic noise reduction features, this impact would remain significant and unavoidable. However, pursuant to Public Resources Code Section 21081(b), specific economic, legal, social, technological, and other benefits of the project would outweigh this significant and unavoidable impact. See Statement of Overriding Considerations.

RATIONALE

Although the CSU does not have jurisdiction to require roadway improvements to reduce traffic noise, Mitigation Measures 4.11-5a, 4.11-5b, and 4.11-5c from the Placer County SAP/PRSP EIR should be implemented in the region to reduce traffic noise. As stated in the SAP/PRSP EIR, not all traffic noise reduction measures would be feasible in all circumstances, and property owners of existing land uses impacted by increased traffic noise may not agree to installation of sound walls or other noise reduction features on their property. Because the CSU does not have jurisdiction to implement mitigation to reduce roadway noise and mitigation that would be implemented under the SAP/PRSP EIR would not reduce traffic noise in all instances, this impact would be significant and unavoidable at the project and cumulative level.

2.4.6 Transportation - Vehicle Miles Traveled (Project and Cumulative)

An evaluation of the project's transportation impacts is found in Section 3.15, "Transportation," of the Final EIR. Implementation of the Sacramento State - Placer Center Master Plan would generate household VMT per resident, university employment work tour VMT per employee, and university school tour VMT per student at levels higher than the applicable regional thresholds (**Impact 3.15-2**). This impact is significant and unavoidable at the project and cumulative level.

MITIGATION MEASURES

Mitigation Measure 3.15-2: Develop and Implement a Transportation Demand Management Program

As specified in the CSU TISM and reinforced by the CSU Transportation and Parking Policy Bulletin 20-003 (CSU 2020), Sacramento State shall develop and implement a TDM program designed to reduce campus-generated VMT. The program shall be developed after construction of Phase 1 and include regular monitoring of VMT performance. The program shall include quantifiable VMT reduction strategies contained in the Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (CAPCOA 2021) (CAPCOA Handbook) and any other strategies with similar supporting evidence about their effectiveness.

During the first year of operation during Phase 1 and at least every 2 years thereafter, Sacramento State will survey and record household VMT per resident, university work tour VMT per employee, and school tour VMT per student. The first survey will establish observed baseline values for each VMT metric to benchmark against the applicable impact thresholds. This survey should be coordinated with any similar assessment necessary for compliance with the CSU Transportation and Parking Policy Bulletin 20-003. Surveys shall continue until substantial evidence is sufficient to demonstrate that the project performs below the applicable VMT thresholds and is likely to remain at or better than this level. In any survey period where VMT rates are not below the threshold, Sacramento State will implement additional VMT reduction strategies either from those identified in the CAPCOA Handbook or that emerge over time from new research. Potential mitigation measures can include improving transit access and frequency, transit subsidy, parking management, commuter programs (carpool or vanpool), rideshare programs, pedestrian and bicycle facilities, bikeshare programs etc.

FINDING

The CSU Board of Trustees finds that implementation of the identified mitigation measure will reduce impacts from VMT attributable to the proposed project. Pursuant to Public Resources Code Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project which will mitigate, in part, this significant VMT impact attributable to the project, as identified in the Final EIR. However, there are no feasible mitigation measures that will reduce the identified significant impact to a level below significant. Therefore, this impact would remain significant and unavoidable at the project and cumulative level. However, pursuant to Public Resources Code Section 21081(b), specific economic, legal, social, technological, and other benefits of the project would outweigh this significant and unavoidable impact. See Statement of Overriding Considerations.

RATIONALE

Implementation of Mitigation Measure 3.15-2 would reduce VMT based on the expected effectiveness of VMT reduction strategies in a suburban land use context as documented in the CAPCOA Handbook. In addition, the project contributes to the basic objectives of SB 743 for local land projects such as adding development in a planned mixed-use growth area where shorter trip lengths to destinations allow more multimodal choices. However, the increase in VMT would remain significant and unavoidable at the project and cumulative level.

2.4.7 Cumulative Increase in Demand for New or Expanded Utility Infrastructure - Water Conveyance and Treatment

Overall, cumulative projects would develop more than 50,000 acres in the region, adding more than 100,000 residential units and millions of square feet of non-residential building floor area. Because there is not sufficient water treatment capacity for all approved and future projects, PCWA is planning to construct the Ophir WTP, which would provide capacity for approved and future projects. The timing and capacity of the Ophir WTP is still under consideration (PCWA 2016:2-10).

Buildout of the net SAP and PRSP areas, including the off-campus center, would generate the need for water treatment and conveyance infrastructure, including pipelines and increased water treatment capacity. While existing WTPs have some capacity to serve new development, the amount of treatment capacity needed exceeds current available capacity. This impact is significant and unavoidable at the cumulative level.

MITIGATION MEASURES

SAP/PRSP Mitigation Measure 4.15-2

FINDING

The CSU Board of Trustees finds that implementation of the identified mitigation measure will reduce water conveyance and treatment impacts attributable to the proposed project. Pursuant to Public Resources Code Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project which will mitigate, in part, this significant impact attributable to the project, as identified in the Final EIR. Those changes or alterations are within the responsibility and jurisdiction of another public agency and such changes have been adopted by such other agency. Because the CSU does not have jurisdiction in the County or City of Roseville to require implementation of additional water conveyance and treatment infrastructure, this impact would remain significant and unavoidable. However, pursuant to Public Resources Code Section 21081(b), specific economic, legal, social, technological, and other benefits of the project would outweigh this significant and unavoidable impact. See Statement of Overriding Considerations.

RATIONALE

While implementation of adopted SAP/PRSP Mitigation Measure 4.15-2 would ensure that there is adequate water treatment capacity available to serve buildout of the net SAP and PRSP areas, these facilities are outside Sacramento State's jurisdiction. No additional feasible mitigation is available. Sacramento State – Placer Center is included in the PRSP and, but for the implementation of Mitigation Measure 4.15-2 by Placer County, when combined with the PRSP as a whole and other cumulative development in the region, would demand water treatment capacity that may not be available. Thus, though unlikely with the County's action, the project would result in a considerable contribution to a significant cumulative impact. This is a significant and unavoidable cumulative impact.

3 FINDINGS REGARDING ALTERNATIVES

Section 15126.6(a) of the CEQA Guidelines requires the discussion of "a reasonable range of alternatives to a project, or the location of a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." The Final EIR identified and considered the following reasonable range of feasible alternatives to the proposed project which would be capable, to varying degrees, of reducing identified impacts:

- ▶ Alternative 1: No Project – No Development Alternative

- ▶ Alternative 2: No Project – Planned Land Use Alternative
- ▶ Alternative 3: No Project – Alternative Land Use Development Consistent with Surrounding Placer One
- ▶ Alternative 4: Regional University Offsite Alternative
- ▶ Alternative 5: Increased Development Density – Reduced Footprint Alternative
- ▶ Alternative 6: Increased On-Campus Housing Alternative

These alternatives are evaluated for their ability to avoid or substantially lessen the impacts of the proposed project identified in the Final EIR, as well as consideration of their ability to meet the basic objectives of the proposed project as described in the Final EIR.

3.1 ALTERNATIVE 1: NO PROJECT-NO DEVELOPMENT ALTERNATIVE

3.1.1 Description

The State CEQA Guidelines (Section 15126.6[e][1]) states the purpose for describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The Guidelines suggest two typical paths for discussing the no project alternative: 1) when the project is the revision of an existing land use or regulatory plan, the no project alternative would be a continuation of the existing plan into the future, or 2) if the project is other than a land use plan, for example a development project on identifiable property, the no project alternative is the circumstance under which the project does not proceed, specifically the practical result of the project's non-approval (not a set of artificial assumptions that would be required to preserve the existing physical environment).

Alternative 1, the No Project – No Development Alternative, falls under the second category. Under Alternative 1, no actions would be taken by Sacramento State and the project site would remain unchanged from current conditions. The project site would remain vacant grazing pastureland. Although the SAP/PRSP designated the site for use as a University and assumed that stormwater discharge from Placer One development to the south of the project site would drain onto the project site, Alternative 1 assumes that no university would be constructed, and no university-serving stormwater facilities would be constructed on the project site. The under-construction Placer One development, for which stormwater facilities were approved on the Sacramento State – Placer Center site under the PRSP/SAP EIR, would construct and use stormwater facilities as originally planned in the PRSP. In addition, as described in Section 3.1, although most of the surrounding land is currently vacant pastureland, these lands are approved for development in the PRSP. The No Project – No Development Alternative would not meet the project objectives because no university would be developed. However, as required by CEQA, the No Project – No Development Alternative was evaluated in the Final EIR.

Although it is acknowledged that with the No Project – No Development Alternative, there would be no discretionary action by Sacramento State and thus no impact, for purposes of comparison with the other alternatives, conclusions for each technical area are characterized as “impacts” that are substantially less, less, similar, greater, or substantially greater than those of the proposed project.

Implementation of this alternative would reduce all identified significant impacts of the Sacramento State - Placer Center Master Plan because no off-campus center would be developed.

3.1.2 Finding

The CSU Board of Trustees rejects the No Project – No Development Alternative as undesirable as it fails the project's fundamental purpose and does not achieve any of the project objectives, and because specific economic, legal, social, technological or other considerations make the alternative infeasible.

3.1.3 Rationale

The No Project – No Development Alternative would not expand access to higher education because no off-campus center would be constructed. The project site would remain undeveloped, which would be inconsistent with the established University land use designation in the County's PRSP. Without the creation of a campus in this location, the CSU-identified demand for enrollment in the region would go unmet, which in turn would mean that the contribution to the local and state workforce would be unrealized.

3.2 ALTERNATIVE 2: NO PROJECT - PLANNED LAND USE ALTERNATIVE

3.2.1 Description

As described under Alternative 1, State CEQA Guidelines (Section 15126.6[e][1]) suggest two typical paths for discussing the no project alternative. Alternative 2 is consistent with the first path described—a continuation of the existing plan into the future. However, the approved PRSP includes a University district on the 301-acre project site. The PRSP EIR (p. 3-29) describes the university as follows:

University: The Sac State – Placer Center is centrally located in the plan area. The 301-acre University district may accommodate 3 million sq. ft. for classrooms, offices, and other spaces needed for its operations. (Floor area estimate is based on County projection of a theoretical total of 25,000 Sac State students and 5,000 Sierra College students.) The Sac State – Placer Center may also accommodate housing for 5,000 students and 200 faculty. Because this district would ultimately be owned by the State of California, buildout of the Sac State – Placer Center would not be subject to Placer County's local land use regulations. Therefore, the PRSP does not specify any permitted uses or development standards for the University site.

Under Alternative 2, a university campus would be developed on the project site that includes 30,000 students and approximately 1,600 faculty. This is a substantially higher enrollment than under the proposed project, which is designed to accommodate 20,000 students and 1,089 full-time faculty at full buildout. Alternative 2 also includes more housing, as it would accommodate 5,000 students and 200 faculty, whereas the proposed project includes a total of 1,200 beds at full buildout. It is assumed that an entity that is not associated with the CSU system would implement this alternative, as this larger alternative university would provide development substantially beyond CSU system needs.

To accommodate the 33 percent higher enrollment and significantly expanded student housing, larger buildings would be required, which would increase the overall development footprint and would likely require taller structures. Like the proposed project, it is assumed that Alternative 2 would include a lighted stadium, have similar design objectives, avoid the stream system and vernal pools to the extent feasible, and include energy and water efficiency measures. Furthermore, the under-construction Placer One development, for which stormwater facilities were approved on the Sacramento State – Placer Center site under the PSRP/SAP EIR, would construct and use stormwater facilities as originally planned in the PRSP.

3.2.2 Finding

The CSU Board of Trustees rejects the No Project – Planned Land Use Alternative as undesirable because although it achieves project's fundamental purpose (i.e., to support the University's educational mission by guiding the physical development of a new off-campus center to accommodate student enrollment needs) and project objectives, CSU would not be the entity establishing the university. Therefore, Alternative 2 would not achieve the CSU-specific goals and policies and the No Project – Planned Land Use Alternative would result in an excess of development that is beyond the needs of the CSU system. Furthermore, Alternative 2 would not reduce or avoid the environmental impacts of the Sacramento State - Placer Center Master Plan. Therefore, the Trustees decline to adopt this alternative pursuant to the standards in CEQA and the CEQA Guidelines.

3.2.3 Rationale

It is likely that implementation of the No Project – Planned Land Use Alternative would achieve the intent of the project to expand higher education opportunities in the region. However, beyond this simple objective, the way in which such higher education would be provided is unknown, as the CSU system would not be the entity implementing the alternative. The extent to which this alternative would achieve specific objectives related to supporting academic and student success; realizing diversity, inclusion, and access; anchoring the institution in partnerships; promoting community building and placemaking; and serving as a model for sustainability and resiliency cannot be known without understanding the entity undertaking the alternative, that entity's specific goals and objectives for the alternative university and community connection/enhancement, as well as the specific design of the university under Alternative 2. Because CSU would not be the entity establishing the university, Alternative 2 would not achieve the CSU-specific goals and policies. Furthermore, the No Project – Planned Land Use Alternative would result in an excess of development that is beyond the needs of CSU system.

3.3 ALTERNATIVE 3: NO PROJECT - ALTERNATIVE LAND USE DEVELOPMENT CONSISTENT WITH PLACER ONE

3.3.1 Description

Alternative 3: No Project – Alternative Land Use Development Consistent with Placer One assumes that the proposed Sacramento State – Placer Center Master Plan is not approved. The Gift Agreement provisions state that the project site, or a portion of the site, may revert back to Placer One (formerly Placer Ranch) if: (1) CSU fails to complete a Campus Master Plan and CEQA review within 3 years of accepting the property, or (2) CSU confirms in writing 15 years after acceptance that it will not use the Property for the Placer Campus. Alternative 3 assumes that the project site would revert to Placer One and that the County would redesignate the 301-acre site from University to land uses that include residential, commercial, public facilities, parks, open space, and associated infrastructure, in proportions consistent with these land uses in the remainder of the PRSP area.

Instead of University uses, the site would support additional commercial mixed use, high-density residential, the 5-acre Placer County fire station and training center, and open space area to preserve 53 acres of the site along the stream zone, consistent with the proposed project. As shown in Table 5, of the Draft EIR, below, Alternative 3 is assumed to include 861,000 sq. ft. of commercial and employment uses and 1,006 residential units, including low-, medium-, and high-density. Consistent with the PRSP, Alternative 3 would incorporate measures to reduce energy usage, conserve water, incorporate water efficient landscaping, treat stormwater, and reduce reliance on the automobile. It is assumed that the housing would be located outside of the landfill buffer and that additional roadway infrastructure may be needed to support additional vehicular movement across the site, which is not necessary for the pedestrian-focused off-campus center.

For purposes of this analysis, it is assumed that the land use mix in Alternative 3, which would increase the number of residents and workers on the project site, would result in increased vehicular trips and vehicle miles traveled (VMT). As compared to the proposed project, the housing in Alternative 3 would not be tied directly to a university land use. This could result in residents working off-site or workers coming to the site because they live elsewhere. This cannot be estimated with any precision, and the mix of land uses could also support people living and working on the project site or nearby, which could reduce trips. However, the analyses below take the approach that VMT would increase in Alternative 3 because workers may need to work or live outside of the project site, which may not allow for as many people walking or biking to and from class or work from on campus housing, as would occur with students, faculty, and staff on a university campus.

Table 5 Estimated Land Uses for Alternative 3 Based on the PRSP Land Use Designations

Land Use Designation	Acres	% of Total Acres ¹	Floor Area/ Dwelling Units	% of Total Units
Employment and Commercial Uses				
Campus Park (CP)	45.2	15.0	608,012 sq. ft.	--
General Commercial (GC)	3.0	1.0	39,187 sq. ft.	--
Commercial Mixed Use (CMU) ²	16.1	5.4	213,901 sq. ft.	--
Subtotal	64.3	21.4	861,100 sq. ft.	--
Residential Uses				
Low Density Residential (LDR)	60.9	20.2	302 du	30.0
Low Density Residential— Age-Restricted (LDR-A)	25.0	8.3	143 du	14.2
Medium Density Residential (MDR)	15.4	5.1	120 du	11.9
High Density Residential (HDR) ²	17.6	5.9	441 du	43.8
Subtotal	118.9	39.5	1,006 du	100
Public, Parks, and Open Space Uses				
Public Facilities - Schools (PF)	4.5	1.5	--	--
Public Facilities – County (PF)	1.5	0.5	--	--
Fire Station/Training Center ³	5.0	1.6	--	--
Parks and Recreation – Active Parks (PR)	9.6	3.2	--	--
Open Space – Paseos & Preserves (OS) ⁴	53.0	17.6	--	--
Subtotal	73.6	24.4	--	--
Other				
Major Roads/Landscape (HE/LSE)	44.6	14.8	--	--
Subtotal	44.6	14.8	--	--
Total	301	100	861,100 sq. ft./ 1,006 du	100

Notes: du = dwelling units; sq. ft. = square feet.

¹ Land use percentages are based on Table 3-4 of the SAP/PRSP EIR.

² Alternative 3 assumes that 19 acres previously identified as University would be used for additional commercial mixed use and high density residential.

³ Alternative 3 assumes that 5 acres of the site would be used by Placer County for a fire station and training center, similar to the proposed project.

⁴ Alternative 3 assumes a total of 53 acres of open space, consistent with the open space in the proposed project.

Source: Data compiled by Ascent 2023.

3.3.2 Finding

The CSU Board of Trustees rejects the No Project – Alternative Land Use Development Consistent with Placer One Alternative as undesirable as it would not achieve any of the project objectives. For the reasons set forth below and more fully described in Final EIR and in the record of proceeding, the Trustees find that Alternative 3 is infeasible, fails to meet most of the basic project objectives and would not substantially lessen the environmental impacts of the Sacramento State - Placer Center Master Plan such that significant impacts would not occur. Therefore, the Trustees decline to adopt this alternative pursuant to the standards in CEQA and the CEQA Guidelines.

3.3.3 Rationale

Alternative 3 would not expand access to higher education in the region because no university would be constructed. Without the creation of a campus in this location, the CSU-identified demand for enrollment in the region would go unmet, which in turn would mean that the intended contribution to the local and state workforce would be unrealized. Furthermore, Alternative 3 would result in similar or greater environmental impacts.

3.4 ALTERNATIVE 4: OFFSITE ALTERNATIVE - REGIONAL UNIVERSITY SPECIFIC PLAN

3.4.1 Description

Within Placer County, there is a 600-acre site designated for a university within the approved Regional University Specific Plan (approved 2008, amended 2019). The Regional University Specific Plan is located south of Pleasant Grove Creek, between Brewer Road and the western boundary of Roseville, approximately 3 to 4 miles southwest of the proposed Sacramento State – Placer Center site. The 1,157-acre Regional University Specific Plan is split into two components: the university plan and the community plan. The university plan includes a 600-acre site for a university campus that could accommodate 6,000 students and 800 faculty and staff, including institutional facilities, 1,155 residential units for students, a faculty retirement village, recreational facilities, and open space. The community plan includes housing, employment, and recreation. Alternative 4 would involve designing the project's proposed off-campus center for the Regional University Specific Plan site, continuing to provide facilities to serve 20,000 students, including Sacramento State and Sierra College students, and 1,089 full-time faculty at full buildout, with 1,200 onsite beds. (Note that this alternative does not make assumptions regarding any development that would occur on the project site in place of the off-campus center.)

The Regional University Specific Plan was evaluated by Placer County in an EIR (SCH# 2005032026) (Placer County 2008). Information from the 2008 EIR was considered, as appropriate, to compare the impacts of the proposed Sacramento State – Placer Center Master Plan site to an off-campus center at the Regional University Specific Plan site. However, due to the elapsed time since the 2008 EIR was certified, changes in the CEQA Guidelines (including that a project's effect on automobile delay (e.g., level of service) is no longer considered a significant environmental impact), and other changes in conditions for the project (such as the approved PCCP), a comparative analysis similar to the other alternatives is provided.

3.4.2 Finding

The CSU Board of Trustees rejects the Offsite Alternative – Regional University Specific Plan Alternative as undesirable because although it would generally achieve the project objectives, the site is not available for purchase and if it became available the cost of purchase would greatly increase the cost of the project. The increased costs would make the project infeasible. For the reasons set forth below and more fully described in Final EIR and in the record of proceeding, the Trustees find that Alternative 4 is infeasible and would not substantially lessen the environmental impacts of the Sacramento State - Placer Center Master Plan. Therefore, the Trustees decline to adopt this alternative pursuant to the standards in CEQA and the CEQA Guidelines.

3.4.3 Rationale

Alternative 4 would achieve the intent of the project to expand higher education opportunities in the region. Alternative 4 would achieve the project objectives related to supporting academic and student success; realizing diversity, inclusion, and access; anchoring the institution in partnerships; promoting community building and placemaking; and serving as a model for sustainability and resiliency. However, the Regional University Specific Plan was purchased in 2021 by Hillsdale College, a Michigan-based private university (HC Real Estate Holdings, Inc.).

Hillsdale is currently in the process of partnering with a home builder to begin construction, which would proceed with construction of a private university funded at least in part by the home sales. Therefore, although this is a site within Placer County that is identified as a university, it is not likely available for purchase (as of April 2023). Even if this site became available for purchase, it would greatly increase the cost of the project, which may become a feasibility concern for CSU. The proposed project site (within the PRSP) is land that was donated to the CSU for use as a university; it cannot be sold to support purchasing a different site. Rather, the site would revert to Placer One if CSU fails to complete a campus master plan and CEQA review within 3 years of accepting the property, or if CSU confirms in writing 15 years after acceptance that it will not use the property for the Placer Campus. Furthermore, the PRSP has designed land uses surrounding the proposed project site in coordination with an anticipated CSU campus. The Sacramento State – Placer Center is a critical component of the PRSP and is one of the primary PRSP objectives. Removal of this planned element would disrupt the carefully designed land use configuration, trails and transportation network, utilities infrastructure, and economic viability of the PRSP. Finally, Alternative 4 would result in similar environmental impacts on a different site; it would not avoid or substantially reduce the project's impacts.

3.5 ALTERNATIVE 5: INCREASED DEVELOPMENT DENSITY - REDUCED FOOTPRINT ALTERNATIVE

3.5.1 Description

This alternative would reduce the project footprint to reduce footprint-related impacts, such as ground disturbance and impacts to the sensitive habitats on the project site, including the stream zone and vernal pools. Alternative 5 would maintain the same academic goals, campus population, facilities, programming, on campus housing, and development potential as the proposed project. Similar to the proposed project, Alternative 5 would include a lighted stadium, have similar design objectives, would avoid the stream system and vernal pools to the extent feasible, and incorporate energy and water efficiency measures. The footprint reduction would be achieved by condensing a similar level of development into a smaller area, which would increase the net density, and would pull development away from the stream system and vernal pools. Building footprints would be smaller and buildings would be taller. It is assumed that building heights would have a 150-foot maximum, which would be consistent with the PRSP development standards. Surface parking lots would be reduced and more of the planned parking would be provided in parking structures. The overall result would be a more compact, urban feel to the off-campus center, with an increase in the area of open space around the stream zone and vernal pools.

3.5.2 Finding

The CSU Board of Trustees rejects the Increased Development Density – Reduced Footprint Alternative as undesirable because, although it would achieve the project objectives and would reduce the project's mitigable impacts, it would greatly increase the cost of the project, which would make the project infeasible. For the reasons set forth below and more fully described in Final EIR and in the record of proceeding, the Trustees find that Alternative 5 is infeasible and would not avoid the significant and unavoidable impacts of the Sacramento State - Placer Center Master Plan. Therefore, the Trustees decline to adopt this alternative pursuant to the standards in CEQA and the CEQA Guidelines.

3.5.3 Rationale

Alternative 5 would achieve the intent of the project to expand higher education opportunities in the region. Alternative 5 would achieve the project objectives related to supporting academic and student success; realizing diversity, inclusion, and access; anchoring the institution in partnerships; promoting community building and placemaking; and serving as a model for sustainability and resiliency. The increased building heights and development of parking structures instead of surface parking lots would increase the cost of development. Surface parking spaces cost about 5,000 to \$10,000 to construct (including the value of the land they occupy). In comparison,

structured parking costs between 25,000 and \$50,000 per space. In addition, taller buildings require thicker materials, such as concrete or steel, on the lower floors to support the superstructure (as do the internal elements such as plumbing and electricity). Similarly, the cost of the foundation rises as the building gets taller because it needs to support more weight.

3.6 ALTERNATIVE 6: INCREASED CAMPUS HOUSING ALTERNATIVE

Alternative 6 assumes development of the proposed Sacramento State – Placer Center off-campus center on the proposed project site; however, the Master Plan would be revised to include increased on-campus housing. The onsite student, faculty, and staff housing would be increased from housing for 6 percent of the total campus population (as in the proposed project) to 8 percent. This would increase the onsite housing from 1,200 beds to 1,600 beds, which would remain along the south and west edges of the campus core near the Sunrise Boulevard alignment and Town Center land use elements to the east. These additional units would be accommodated by increasing the height of the planned housing buildings, which would provide space for additional units without increasing the building footprints. Onsite housing would also be incorporated into Phase 4 of the off-campus center. In Phase 4, the Innovation District land use would become mixed-use, allowing for housing units above the public-private business opportunities that support the academic enterprise. The mixed-use buildings are assumed to support the public-private partnership spaces on the ground-level to second or third floor of buildings and then housing units on the fourth and possibly fifth floors. The units within the Innovation District would be a mix of multifamily units that are deed restricted or otherwise permanently dedicated as affordable housing units and market-rate multifamily units (i.e., not reserved only for students and staff). As with the student and faculty/staff housing, the intent would be to alter the design of Phase 4 by increasing the density and building heights so that the overall footprint of development would be similar to that proposed by the project. The PRSP EIR (Table 3-4) included 300 reserve units in the high density residential (HDR) unit total, which would be permitted to be allocated to any parcel in the Town Center district, including commercial mixed use (CMU) parcels located outside of the landfill buffer. Based on this, Alternative 6 assumes that these 300 units would be built on the project site, in the northeastern portion of the project site, which would be in walking distance to the Town Center to the east, and just south of the Campus Park District, which is planned to be a 335-acre job center with a mix of office, research and development, retail, and light industrial. Based on the Placer County's Affordable Housing and Employee Accommodation Ordinance (which took effect on January 1, 2021), at least 10 percent of the total units in new residential development with more than 100 units is required to be affordable.¹ Accordingly, this alternative assumes that 10 percent of the units, 30 units, would be permanently dedicated as affordable housing units and the remaining 270 units would be market rate multifamily units.

For purposes of this analysis, it is assumed that the provision of affordable housing and multifamily housing in northeastern portion of the project site supports decreased VMT because it places such housing adjacent to both employment opportunities and the retail and commercial land uses in the PRSP town center. Proximity to destinations allows for more opportunities to use active transportation and transit and to be less reliant on private vehicles. In particular, the California Air Pollution Control Officers Association (CAPCOA) estimates that multifamily units that are permanently dedicated affordable housing units can reduce VMT and thereby result in up to 28.6 percent decrease in greenhouse gas emission (CAPCOA 2021).

3.6.1 Finding

The CSU Board of Trustees rejects the Increased On-Campus Housing Alternative as undesirable due to the increased project costs. For the reasons set forth below and more fully described in Final EIR and in the record of proceeding, the Trustees find that Alternative 6 is infeasible. Therefore, the Trustees decline to adopt this alternative pursuant to the standards in CEQA and the CEQA Guidelines.

¹ Housing affordability is based on the Area Median Income (AMI) for a 4-person household. (Placer County's AMI for a four-person household is \$102,200 as of 5/13/22). The AMI and income limits for other household sizes and income levels is updated annually by the State.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

As described in the Final EIR, the environmentally superior alternative would be Alternative 6: Increased On-Campus Housing Alternative because it would reduce the overall environmental impacts compared to the proposed project. Alternative 6 would increase on-campus housing, which would reduce impacts related to air quality, noise, and VMT, which results in a reduction in GHG emissions. Alternative 6 would not avoid the significant and unavoidable impacts of the project; however, Alternative 6 would be environmentally superior because it would reduce the project's significant unavoidable impacts.

3.6.2 Rationale

Alternative 6 would achieve the intent of the project to expand higher education opportunities in the region. Alternative 6 would also achieve the project objectives related to supporting academic and student success; realizing diversity, inclusion, and access; anchoring the institution in partnerships; promoting community building and placemaking; and serving as a model for sustainability and resiliency. The cost of construction would increase because of the additional housing on the same footprints, involving taller structures. However, this would also support reduced VMT and related GHG emissions.

4 GENERAL CEQA FINDINGS

4.1 MITIGATION MONITORING AND REPORTING PROGRAM

Based on the entire record before the CSU Board of Trustees and having considered the unavoidable significant impacts of the project, the CSU Board of Trustees hereby determines that all feasible mitigation within the responsibility and jurisdiction of Sacramento State has been adopted to reduce or avoid the potentially significant impacts identified in the Final EIR, and that no additional feasible mitigation is available to further reduce significant impacts. The feasible mitigation measures are discussed in Sections 2.3 and 2.4, above, and are set forth in the MMRP.

Section 21081.6 of the Public Resources Code requires the CSU Board of Trustees to adopt a monitoring or compliance program regarding changes made to the project and mitigation measures imposed to lessen or avoid significant effects on the environment. The MMRP for the Sacramento State - Placer Center Master Plan project is hereby adopted by the CSU Board of Trustees because it fulfills the CEQA mitigation monitoring requirements, as follows:

- ▶ The MMRP is designed to ensure compliance with the changes in the project and mitigation measures imposed on the project during project implementation; and
- ▶ Measures to mitigate or avoid significant effects on the environment are fully enforceable through conditions of approval, permit conditions, agreements, or other measures.

4.2 CEQA GUIDELINES SECTION 15091 AND 15092 FINDINGS

Based on the foregoing findings and the information contained in the administrative record, the CSU Board of Trustees has made one or more of the following findings with respect to each of the significant effects of the project:

1. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.
2. Those changes or alterations are within the responsibility and jurisdiction of another public agency and such changes have been adopted by such other agency, or can and should be adopted by such other agency.

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

Based on the foregoing findings and the information contained in the administrative record, and as conditioned by the foregoing:

1. All significant effects on the environment due to the project have been eliminated or substantially lessened where feasible.
2. Any remaining significant effects that have been found to be unavoidable are acceptable due to the overriding considerations set forth herein.

4.3 CSU BOARD OF TRUSTEES INDEPENDENT JUDGMENT

The Final EIR for the Sacramento State - Placer Center Master Plan reflects the CSU Board of Trustees' independent judgment in accordance with Public Resources Code 21082.1(c)(3). Having received, reviewed, and considered the information in the Final EIR, as well as other information in the record, the CSU Board of Trustees hereby makes findings pursuant to and in accordance with Sections 21081, 21081.5, and 21081.6 of the Public Resources Code.

4.4 NATURE OF FINDINGS

Any findings made by the CSU Board of Trustees shall be deemed made, regardless of where it appears in this document. All of the language included in this document constitutes findings by the CSU Board of Trustees, whether or not any particular sentence or clause includes a statement to that effect. The CSU Board of Trustees intends that these findings be considered as an integrated whole and, whether or not any part of these findings fail to cross-reference or incorporate by reference any other part of these findings, that any finding required or committed to be made by the CSU Board of Trustees with respect to any particular subject matter of the Final EIR, shall be deemed to be made if it appears in any portion of these findings.

4.5 RELIANCE ON RECORD

Each and all of the findings and determinations contained herein are based on substantial evidence, both oral and written, contained in the administrative record relating to the project.

4.6 RECORD OF PROCEEDINGS

In accordance with PRC Section 21167.6(e), the record of proceedings for the CSU Board of Trustees' decision on the project includes the following documents:

- ▶ The NOP for the project and all other public notices issued in conjunction with the project;
- ▶ All comments submitted by agencies or members of the public during the comment period on the NOP;
- ▶ The Draft EIR for the project and all appendices;
- ▶ All comments submitted by agencies or members of the public during the comment period on the Draft EIR;
- ▶ The Final EIR for the project, including comments received on the Draft EIR, responses to those comments, and appendices;
- ▶ Documents cited or referenced in the Draft EIR and Final EIR;
- ▶ The Sunset Area Plan/Placer Ranch Specific Plan EIR (SAP/PRSP EIR) (State Clearinghouse No. 2016112012);
- ▶ The MMRP for the project;

- ▶ All findings and resolutions adopted by the Trustees in connection with the project and all documents cited or referred to therein;
- ▶ All reports, studies, memoranda, maps, staff reports, or other planning documents relating to the project prepared in compliance with the requirements of CEQA and with respect to the Trustees' action on the project;
- ▶ All documents submitted by other public agencies or members of the public in connection with the project, up through the close of the final public hearing;
- ▶ Any minutes and/or verbatim transcripts of all information sessions, public meetings, and public hearings held in connection with the project;
- ▶ Any documentary or other evidence submitted at such information sessions, public meetings, and public hearings;
- ▶ Any and all resolutions adopted by the CSU regarding the project, and all staff reports, analyses, and summaries related to the adoption of those resolutions;
- ▶ Matters of common knowledge, including, but not limited to federal, state, and local laws and regulations;
- ▶ Any documents expressly cited in these findings and any documents incorporated by reference, in addition to those cited above;
- ▶ Any other written materials relevant to the CSU Board of Trustees' compliance with CEQA or its decision on the merits of the project, including any documents or portions thereof, that were released for public review, relied upon in the environmental documents prepared for the project, or included in the CSU Board of Trustees non-privileged retained files for the EIR or project;
- ▶ Any other materials required for the record of proceedings by PRC Section 21167.6(e); and
- ▶ The Notice of Determination.

The CSU Board of Trustees intends that only those documents relating to the project and its compliance with CEQA and prepared, owned, used, or retained by the CSU Board of Trustees and listed above shall comprise the administrative record for the project. Only that evidence was presented to, considered by, and ultimately before the CSU Board of Trustees prior to reviewing and reaching its decision on the EIR and project.

4.7 CUSTODIAN OF RECORDS

The custodian of the documents or other material that constitute the record of proceedings, upon which the CSU Board of Trustees' decision is based, is identified as follows:

California State University, Sacramento
Planning, Design, & Construction
6000 J Street
Sacramento, CA 95819

4.8 RECIRCULATION NOT REQUIRED

CEQA Guidelines Section 15088.5 provides the criteria that a lead agency is to consider when deciding whether it is required to recirculate an EIR. Recirculation is required when "significant new information" is added to the EIR after public notice of the availability of the Draft EIR is given, but before certification. (CEQA Guidelines, §15088.5(a).) "Significant new information," as defined in CEQA Guidelines Section 15088.5(a), means information added to an EIR that changes the EIR so as to deprive the public of a meaningful opportunity to comment on a "substantial adverse environmental effect" or a "feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement."

An example of significant new information provided by the CEQA Guidelines is a disclosure showing that a “new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented”; that a “substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted to reduce the impact to a level of insignificance”; or that a “feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it.” (CEQA Guidelines, §15088.5(a)(1)-(3).)

Recirculation is not required where “the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.” (CEQA Guidelines, §15088.5(b).) Recirculation also is not required simply because new information is added to the EIR — indeed, new information is oftentimes added given CEQA’s public/agency comment and response process and CEQA’s post-Draft EIR circulation requirement of proposed responses to comments submitted by public agencies. In short, recirculation is “intended to be an exception rather than the general rule.” (Laurel Heights Improvement Assn. v. Regents of University of California (1993) 6 Cal.4th 1112, 1132.)

In this legal context, the CSU Board of Trustees finds that recirculation of the Draft EIR prior to certification is not required. In addition to providing responses to comments, the Final EIR includes revisions to expand upon information presented in the Draft EIR; explain or enhance the evidentiary basis for the Draft EIR’s findings; update information; and to make clarifications, amplifications, updates, or helpful revisions to the Draft EIR. The Final EIR’s revisions, clarifications and/or updates do not result in any new significant impacts or increase the severity of a previously identified significant impact.

In sum, the Final EIR demonstrates that the project will not result in any new significant impacts or increase the severity of a significant impact, as compared to the analysis presented in the Draft EIR. The changes reflected in the Final EIR also do not indicate that meaningful public review of the Draft EIR was precluded in the first instance. Accordingly, recirculation of the EIR is not required as revisions to the EIR are not significant as defined in Section 15088.5 of the State CEQA Guidelines.

4.9 CERTIFICATION OF THE FINAL ENVIRONMENTAL IMPACT REPORT

The CSU Board of Trustees certifies that the Final EIR, dated January 2024, has been completed in compliance with CEQA and the CEQA Guidelines, that the EIR was presented to the CSU Board of Trustees, and that the Board reviewed and considered the information contained therein before approving the proposed Sacramento State - Placer Center Master Plan as the project, and that the EIR reflects the independent judgment and analysis of the Board. (CEQA Guidelines § 15090.)

5 STATEMENT OF OVERRIDING CONSIDERATIONS

Pursuant to Public Resources Code Section 21081(b) and CEQA Guidelines section 15093(a) and (b), the CSU Board of Trustees is required to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of the project, including region-wide or statewide environmental benefits, outweigh the unavoidable adverse environmental effects, those effects may be considered “acceptable” (CEQA Guidelines, §15093 (a)). CEQA requires the agency to support, in writing, the specific reasons for considering a project acceptable when significant impacts are not avoided or substantially lessened. Those reasons must be based on substantial evidence in the Final EIR or elsewhere in the administrative record (CEQA Guidelines, §15093(b)).

Courts have upheld overriding considerations that were based on a variety of policy considerations including, but not limited to, new jobs, stronger tax base, and implementation of an agency’s economic development goals, growth management policies, redevelopment plans, the need for housing and employment, conformity to community plan,

and provision of construction jobs. See *Towards Responsibility in Planning v. City Council* (1988) 200 Cal App. 3d 671; *Dusek v. Redevelopment Agency* (1985) 173 Cal App. 3d 1029; *City of Poway v City of San Diego* (1984) 155 Cal App. 3d 1037; *Markley v. City Council* (1982) 131 Cal App.3d 656. In accordance with the requirements of CEQA and the CEQA Guidelines, the CSU Board of Trustees finds that the mitigation measures identified in the Final EIR and the MMRP, when implemented, will avoid or substantially lessen many of the significant effects identified in the Final EIR for the proposed Sacramento State - Placer Center Master Plan. However, certain significant impacts of the Sacramento State - Placer Center Master Plan are unavoidable even after incorporation of all feasible mitigation measures. These significant unavoidable impacts are to aesthetics, air quality, noise, transportation, and utilities. The Final EIR provides detailed information regarding these impacts (see Section 2.4 Potentially Significant Impacts that Cannot Be Mitigated Below a Level of Significance).

The CSU Board of Trustees finds that all feasible mitigation measures identified in the Final EIR within the purview of Sacramento State will be implemented with implementation of the Sacramento State - Placer Center Master Plan, and that the remaining significant unavoidable effects are outweighed and are found to be acceptable due to the following specific overriding economic, legal, social, technological, or other benefits based upon the facts set forth above, the Final EIR, and the record, as follows:

1. A CSU capacity assessment identified a market demand of 5,200 students for the Sacramento region by 2035. Enrollment projections are projected to exceed planned capacity by 21 percent in the Sacramento region, including Placer County. Sacramento State - Placer Center is intended to alleviate this pressure on Sacramento State's main campus and meet the needs of the Placer County population, which is one of the fastest-growing regions in California, and one of three areas of California where enrollment demand is expected to exceed capacity in the coming years.
2. The California State University received a land donation of 301 acres from Placer Ranch, Inc. in 2020 intended for (and contingent upon) construction of a university. This donation, which would be forfeited without development of a university on the property, represents a major economic benefit to Sacramento State and the CSU system.
3. The Sacramento State - Placer Center Master Plan is consistent with and fulfills a critical component of Placer One (formerly PRSP) and the larger SAP, which are quickly building out. Infrastructure associated with Placer One is designed and currently being installed to appropriately accommodate the Sacramento State - Placer Center, as it was approved by Placer County as part of the PRSP. Approval and ultimate development of Sacramento State - Placer Center will maintain the local planning context, including the planned balance of land uses which is important to ensure a wide range of environmental, social, and economic benefits associated with Placer One and the larger SAP, including seamless and efficiently designed utility and transportation infrastructure, providing adequate public services and education opportunities, maintaining the anticipated jobs-housing balance, realizing planned economic development opportunities, and capturing forecasted sales and property tax revenue, to name only a few.
4. The Sacramento State - Placer Center Master Plan promotes the academic mission of the CSU by planning for the development of an off-campus center to expand access to higher education in the region and provide opportunities for workforce development through an innovative partnership with Sierra College, while serving as an anchor institution for the larger community and future development in the Sunset Area of Placer County.
5. The Sacramento State - Placer Center Master Plan makes efficient use of land and preserves a balance between developed areas and open space.
6. The Sacramento State - Placer Center Master Plan provides appropriate facilities for student interaction, student learning, passive recreation, and informal and organized recreation.
7. The Sacramento State - Placer Center Master Plan supports the objective of creating a physical framework to support the teaching, research, and public service mission of the campus, creating a dynamic learning and discovery environment, within a compact and connected academic core, that would enrich community life and create sustainable future.

8. The Sacramento State - Placer Center Master Plan will allow for the development of academic, administrative, and support space to accommodate planned program direction in instruction, research and public service functions.
9. The Sacramento State - Placer Center Master Plan provides a comprehensive approach to sustainability and maintains CSU's stewardship of campus landscape and natural resources.
10. The Sacramento State - Placer Center Master Plan establishes a framework for the aesthetics and visual character of the campus.
11. The Sacramento State - Placer Center Master Plan establishes a framework for campus pedestrian and bicycle connections and circulation.
12. The Sacramento State - Placer Center Master Plan will advance California's economic, social, and cultural development, which depends upon broad access to an educational system that prepares the state's inhabitants for responsible citizenship and meaningful careers.
13. The Sacramento State - Placer Center will support the community by providing facilities for education, recreation, and artistic and cultural enrichment to residents of the Placer County area through such functions as extension courses, performing arts events, art exhibits, sporting events, conferences, and workshops.

Considering all the factors, the CSU Board of Trustees finds that there are specific economic, legal, social, technological, and other considerations associated with the project that serve to override and outweigh the project's significant unavoidable effects and, thus, the adverse effects are considered acceptable. Therefore, the CSU Board of Trustees hereby adopts this Statement of Overriding Considerations.

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