



Mitigated Negative Declaration

Pursuant to Title 14, Division 6, Chapter 3, Article 6, Sections 15070 and 15071 of the California Code of Regulations and pursuant to the Procedures for Preparation and Processing of Environmental Documents adopted by the County of Sacramento pursuant to Sacramento County Ordinance No. SCC-116, the Environmental Coordinator of Sacramento County, State of California, does prepare, make, declare, publish, and cause to be filed with the County Clerk of Sacramento County, State of California, this Mitigated Negative Declaration re: The Project described as follows:

1. **Control Number: PLNP2018-00169**
2. **Title and Short Description of Project:** Elkhorn and 32nd St ARCO AMPM
A Use Permit to allow a 24-hour automobile service station with 9 pump islands; 24-hour, 3,180-square-foot convenience store; and 1,152-square-foot automobile wash facility with drive-through on approximately 1.36 acres in the M-1 zoning district.
A Special Development Permit to allow:
Deviation from the frontage street tree requirement on Elkhorn Boulevard;
Deviation from two car wash standards (distance of dryers from tunnel exits, and the treatment of sound-absorbing materials for the wall and ceiling area adjacent to dryers);
On-site signage for a primary automotive service station to exceed 125 square feet.
3. **Assessor's Parcel Number:** 208-0103-002
4. **Location of Project:** The property is located at the southwest corner of the Elkhorn Boulevard and 32nd Street intersection in the North Highlands community.
5. **Project Applicant:** Kenneth Wold
6. Said project will not have a significant effect on the environment for the following reasons:
 - a. It will not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.
 - b. It will not have the potential to achieve short-term, to the disadvantage of long-term, environmental goals.
 - c. It will not have impacts, which are individually limited, but cumulatively considerable.
 - d. It will not have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly.
7. As a result thereof, the preparation of an environmental impact report pursuant to the Environmental Quality Act (Division 13 of the Public Resources Code of the State of California) is not required.
8. The attached Initial Study has been prepared by the Sacramento County Office of Planning and Environmental Review in support of this Mitigated Negative Declaration. Further information may be obtained by contacting the Office of Planning and Environmental Review at 827 Seventh Street, Room 225, Sacramento, California, 95814, or phone (916) 874-6141.

[Original Signature on File]

Tim Hawkins

Environmental Coordinator

County of Sacramento, State of California



COUNTY OF SACRAMENTO
OFFICE OF PLANNING AND ENVIRONMENTAL REVIEW
INITIAL STUDY

PROJECT INFORMATION

CONTROL NUMBER: PLNP2018-00169

NAME: Elkhorn and 32nd St ARCO AMPM

LOCATION: The property is located at the southwest corner of the Elkhorn Boulevard and 32nd Street intersection in the North Highlands community.

ASSESSOR'S PARCEL NUMBER: 208-0103-002

OWNER:

John Newton
5339 San Juan Holdings
5031 Eagleton Way
Granite Bay, CA 95746

APPLICANT:

Kenneth Wold
BP West Coast Products LLC
30 S. Wacker Drive
Chicago, IL 60606

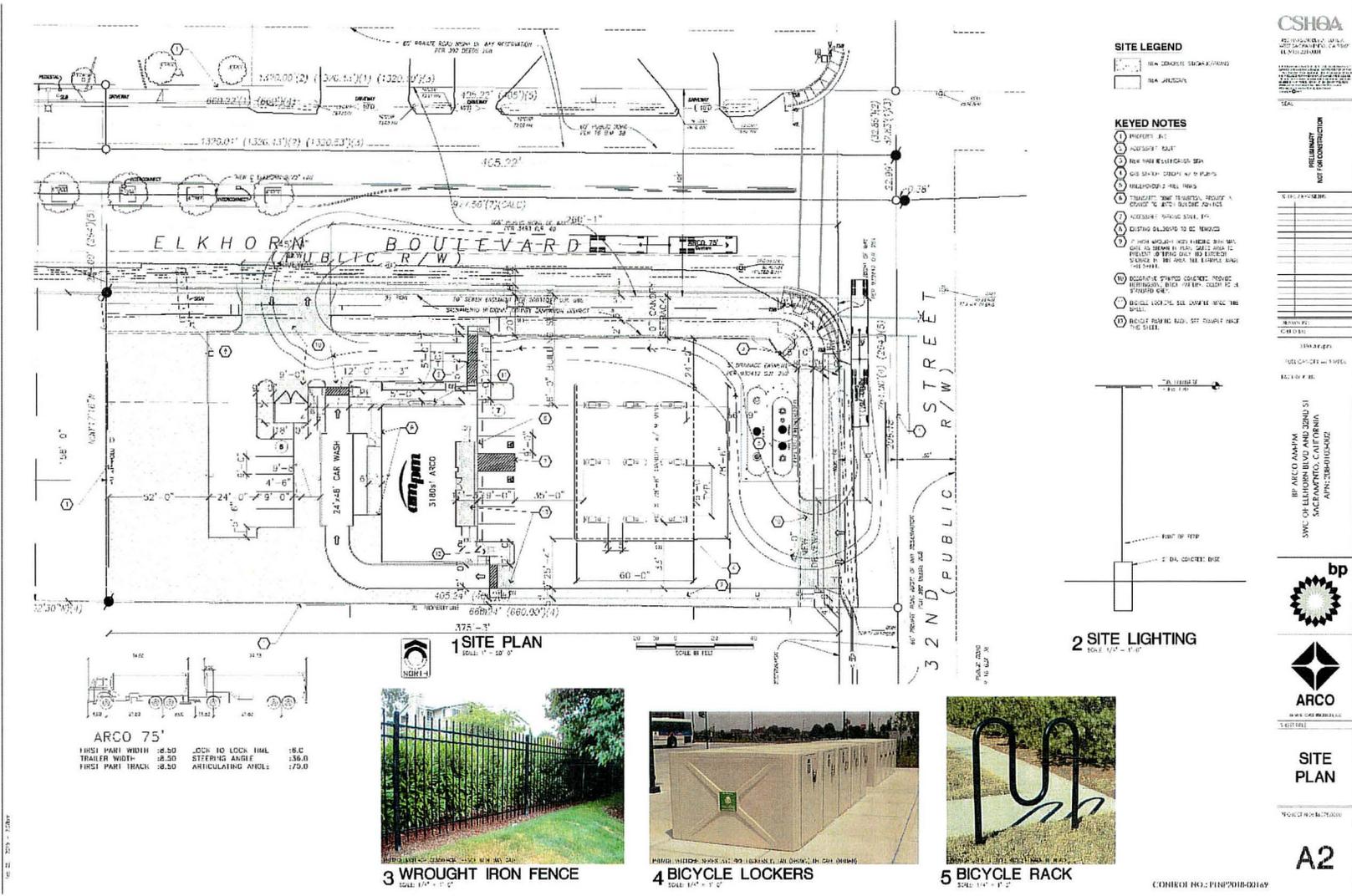
PROJECT DESCRIPTION

1. A Use Permit to allow a 24-hour automobile service station with 9 pump islands; 24-hour, 3,180-square-foot convenience store; and 1,152-square-foot automobile wash facility with drive-through on approximately 1.36 acres in the M-1 zoning district.
2. A Special Development Permit to allow:
 - Deviation from the frontage street tree requirement on Elkhorn Boulevard;
 - Deviation from two car wash standards (distance of dryers from tunnel exits, and the treatment of sound-absorbing materials for the wall and ceiling area adjacent to dryers);
 - On-site signage for a primary automotive service station to exceed 125 square feet.
3. A Design Review to comply with Countywide Design Guidelines..

Plate IS-1: Project Vicinity Map



Plate IS-2: Project Site Plan



The Elkhorn and 32nd St ARCO AMPM project (Project) would allow a new 24-hour automobile service station; a 24-hour, 3,180-square-foot convenience store; and 1,152-square-foot car wash facility with drive through. The fueling station would be comprised of eight fuel pumps with 16 fueling positions. The fueling station is expected to have throughput of approximately 600,000 gallons per month. Fuel would be stored in two underground fuel tanks. The bottom depth of the tanks is at 15'-6" below the ground surface with 5'-0" of earth covering the tops of the tanks. The tanks planned for this location are (1) 25,000 gallon unleaded tank and (1) 22,000 gallon mid-grade/premium split tank.

ENVIRONMENTAL SETTING

The project is located at the southwest corner of Elkhorn Boulevard and 32nd Street in unincorporated Sacramento County. The lot is 1.36 acres, currently vacant and void of trees. The project site is located in an area planned and zoned for light industrial use. The area is currently developed with a variety of commercial and light industrial uses. Existing large lot singlefamily residential homes are located approximately 325 feet northeast and 335 feet southeast of the site. McClellan Park is located 1,500 feet west of the project site.

Elkhorn Blvd- Elkhorn Blvd is a six-lane / four-lane / two-lane facility that is identified as an Throughfare in Sacramento County's General Plan. Elkhorn Blvd is a four-lane divided street in the area of the project. Bike lanes are provided in this area, and sidewalks have been constructed where development has occurred. On-street parking is prohibited, and the posted speed limit is 45 mph.

32nd Street- 32nd Street is a north-south Collector street that extends for two miles from McClellan Park to an intersection on U Street. In the area of the proposed project 32nd Street is a two-lane road. Sidewalk exists on the west side of the street south of the project. The east side of the street has not been developed, and existing SMUD utility poles are located on the east side of the street within a few feet of the existing pavement. The posted speed limit is 35 mph, and traffic calming "undulations" have been installed north of Elkhorn Blvd.

ENVIRONMENTAL EFFECTS

Appendix G of the California Environmental Quality Act (CEQA) provides guidance for assessing the significance of potential environmental impacts. Based on this guidance, Sacramento County has developed an Initial Study Checklist (located at the end of this report). The Checklist identifies a range of potential significant effects by topical area. The topical discussions that follow are provided only when additional analysis beyond the Checklist is warranted.

AIRPORTS

This section supplements the Initial Study Checklist by analyzing if the proposed project would:

- Result in a safety hazard for people residing or working in the vicinity of an airport/airstrip.
- Expose people residing or working in the project area to aircraft noise levels in excess of applicable standards.
- Result in a substantial adverse effect upon the safe and efficient use of navigable airspace by aircraft.

The Project is located east of McClellan Airport.

The McClellan Field Comprehensive Land Use Plan (CLUP), which has been adopted into the Sacramento County General Plan, regulates Land uses in this area. CLUPs are intended to protect public health, safety, and welfare through the adoption of land use standards that minimize the public's exposure to safety hazards and excessive noise levels, and to prevent the encroachment of incompatible land uses around public-use airports (Plate IS-3, Plate IS-4).

The McClellan Air Force Base decommissioning in July of 2002 resulted in a change in the type and frequency of planes using the airport that significantly changed in the characteristic of air craft noise impacting the community around the airport. As part of the *McClellan Air Force Base Draft Final Reuse Plan and Draft Implementation Plan Final Environmental Impact Report/Environmental Impact Statement* (McClellan Reuse EIR/EIS) certified on November 27, 2002, a noise consulting firm analyzed McClellan Airport to determine noise levels associated with the changed/reduced use at McClellan. The updated noise analysis and related noise contours are depicted on Plate IS-5. These were adopted by the County Board of Supervisors, as an override of the existing CLUP, and currently represent the best available information at this time. As shown on the Board-adopted noise contours for McClellan Field, the project site is now located outside of the 60 CNEL noise contour (Plate IS-5). It should be noted, however, that the existing CLUP has not yet been amended to reflect the current/future conditions under non-military use of the airport.

SITE SPECIFIC ANALYSIS

As indicated on the adopted Airport Land Use Commission CLUP map for McClellan Air Force Base/Field the project site is located within the airport's overflight safety zone and within the 65 CNEL noise contour. Review of the CLUP indicates that the proposed project land uses (gas station, retail store and car wash) are compatible with the designated Overflight Zone. The Project lies outside of the 65 CNEL theoretic capacity noise contour, and uses are also compatible with the 65-70 CNEL adopted noise contours. Therefore, the Project would not be impacted as a result of aircraft noise. Additionally, the Project does not propose any structures of excessive height that would

Plate IS-3: McClellan Overflight Zones

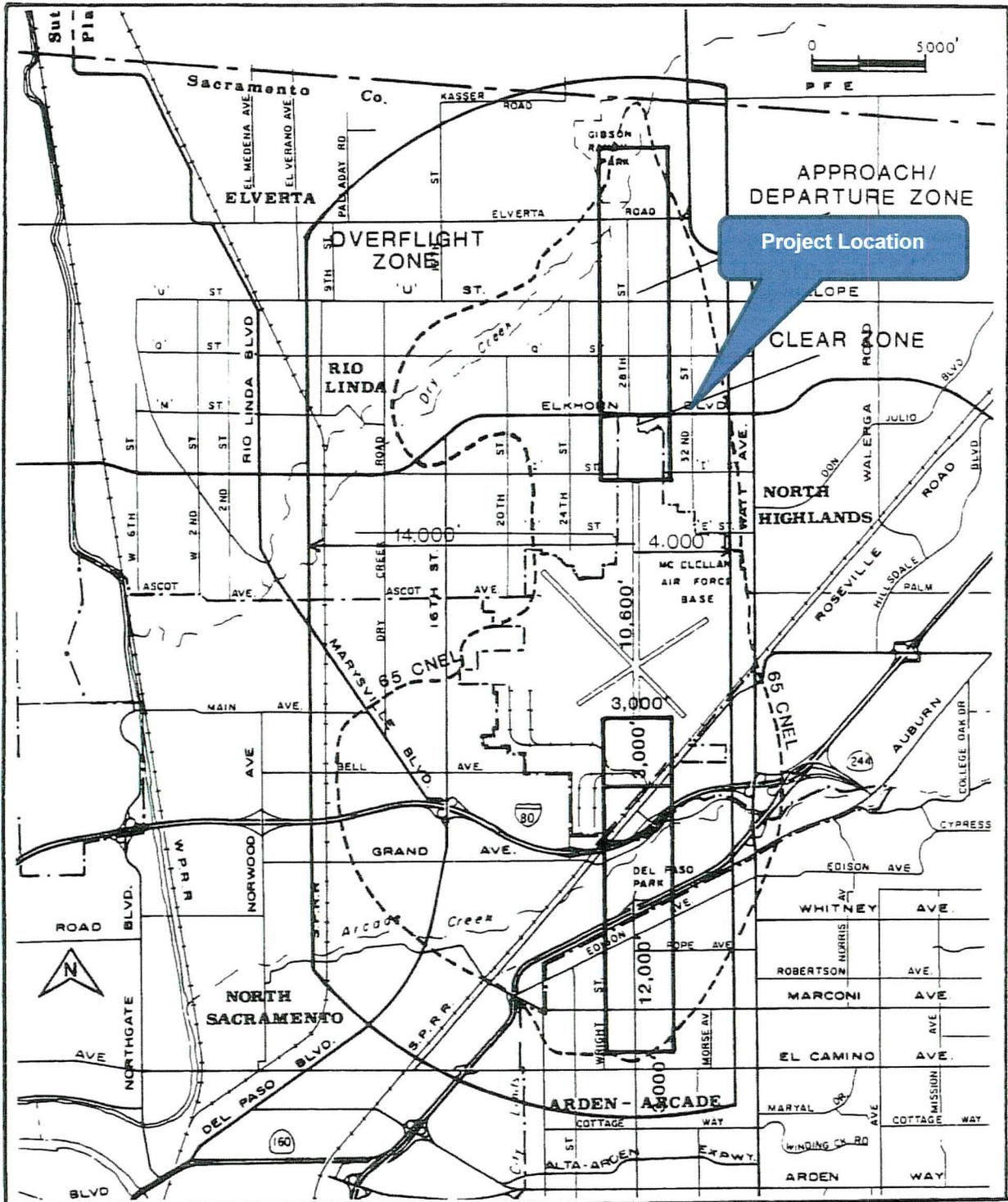


Plate IS-4: McClellan Adopted Noise Contours

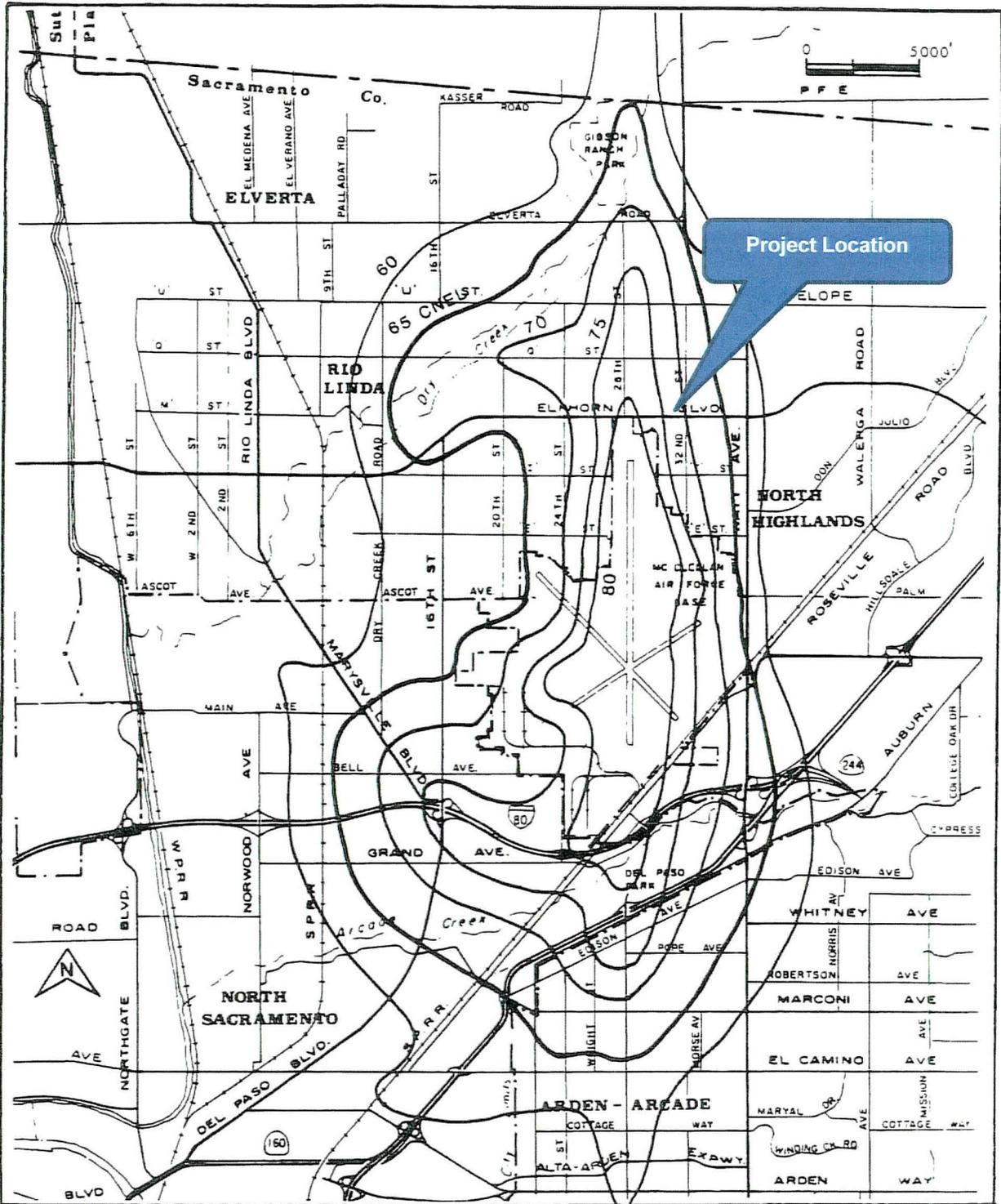
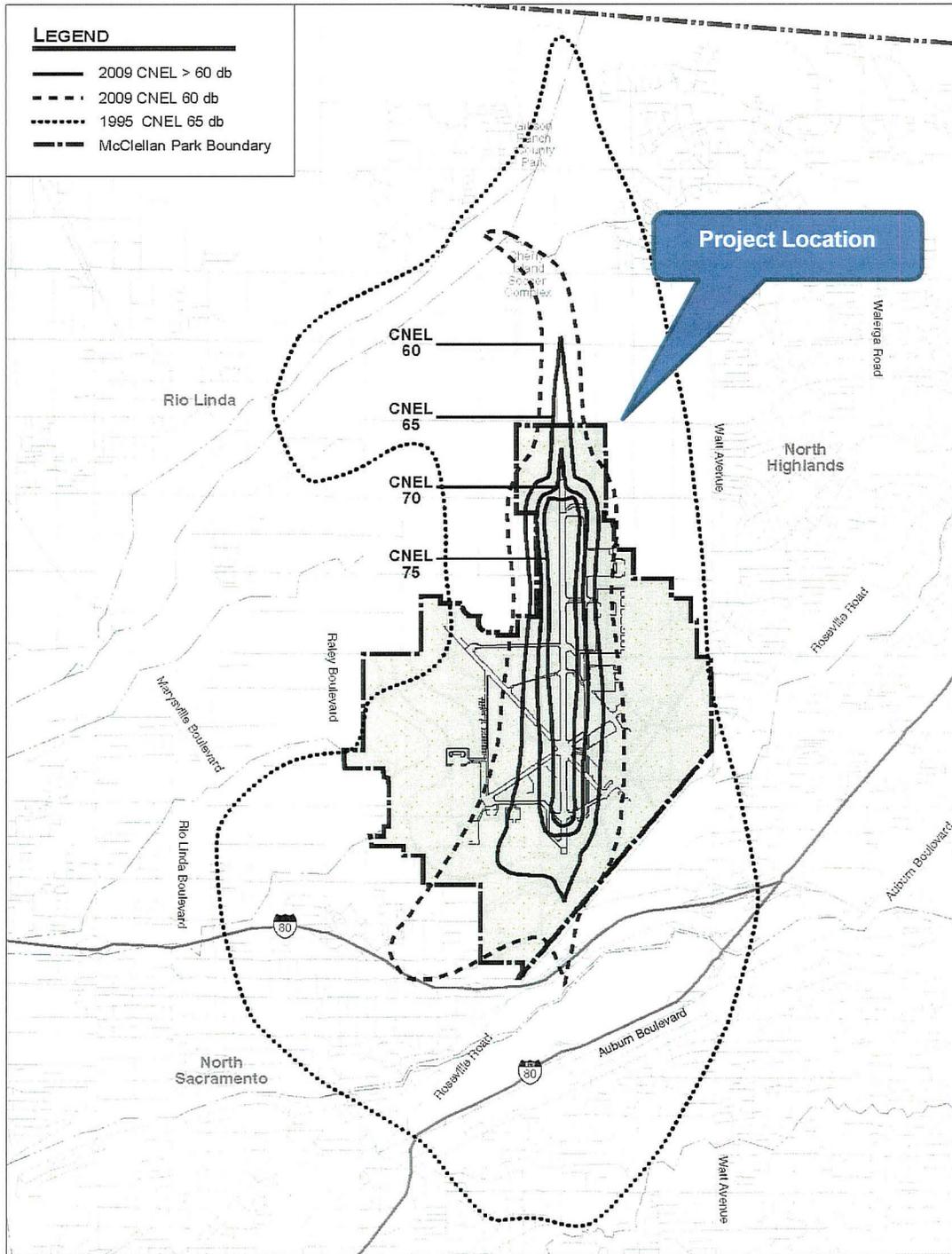


Plate IS-5: McClellan Theoretic Noise Contours

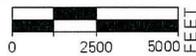


Source: Leigh Fisher Associates 2002; County of Sacramento and U.S. Department of Defense 1997

McClellan Park Noise Exposure - 2009

EXHIBIT 3.5-2

McClellan AFB Draft Final Reuse Plan Draft SEIR
0T077.01 6/02



potentially interfere with the military imaginary surfaces established in the CLUP. Therefore, the Project is compatible with the McClellan CLUP, does not result in a safety hazard for resident or workers, does not expose individuals to excessive noise, and does not create an adverse effect to the safe and efficient use of navigable airspace by aircraft. Impacts related to airports and airspace are ***less than significant***.

PUBLIC UTILITIES

This section supplements the Initial Study Checklist by analyzing if the proposed project would:

- Result in substantial adverse physical impacts associated with the provision of electric or natural gas service

There are several existing utility poles on 32nd Street. Development of the project site and associated roadway improvements to 32nd Street would require relocation of the existing utility poles. Relocation of the utility poles is a temporary impact that would not result in adverse impacts to service to the project or surrounding area. Relocation of the existing poles/utility lines would be conducted in accordance with the standards of the appropriate utility companies; impacts would be ***less than significant***.

TRANSPORTATION/TRAFFIC

This section supplements the Initial Study Checklist by analyzing if the proposed project would:

- Result in a substantial increase in vehicle trips that would exceed, either individually or cumulatively, a level of service standard established by the County.
- Result in a substantial adverse impact to access and/or circulation.
- Result in a substantial adverse impact to public safety on area roadways.

The applicant retained KD Anderson and Associates who prepared the Traffic Impact Study (TIS) for the Project, dated May 13, 2019, which is included as Appendix A and is summarized below. Sacramento County Department of Transportation (DOT) reviewed the application, conducted a trip generation and roadway segment analysis and reviewed the submitted TIS.

REGULATORY SETTING

In Sacramento County, a substantial increase in traffic is defined by Sacramento County General Plan Circulation Element Policy CI-9. According to this policy, an acceptable Level of Service (LOS) is E on urban roadways. If a proposed project would cause a roadway currently operating at an acceptable LOS to decline to an unacceptable LOS, impacts are significant. DOT has developed a screening methodology to help determine whether it is likely that a project will exceed these significance thresholds. If the screening determines that there is likelihood, a Traffic Impact Study is required. The screening methodology indicates that if a proposed project is expected to increase p.m. peak hour vehicle trips by 100 or more or daily trips by 1,000 or more over existing

zoning of the subject property, a detailed traffic study is required to further analyze impacts (Table IS-1).

The limits of the study area were identified by DOT staff and the evaluations were conducted and completed per the direction of DOT staff. DOT conducted an analysis to determine the impact of the increased traffic volume on the adjacent roadway segments and intersections under the existing, and existing plus project conditions.

The analysis included the following roadway segments adjacent to the proposed project:

- Elkhorn Blvd from 26th Street to Watt Avenue
- 32nd Street from I Street to Q Street

The analysis included the following intersections for analysis

- 26th Street/Elkhorn Blvd
- 28th Street/Elkhorn Blvd
- 39th St/Elkhorn Blvd
- 34th St/Elkhorn Blvd
- Watt Ave/Elkhorn Blvd
- 32nd St/Q St
- 32nd St/ I St

For roadways, a project is considered to have a significant impact if it would:

- Result in a roadway operating at an acceptable Level of Service (LOS) to deteriorate to an unacceptable LOS; or
- Increase in Volume to Capacity (V/C) ratio by more than 0.05 at a roadway that is operating at an unacceptable LOS without the project.

For signalized intersections, a project is considered to have a significant impact if it would:

- Cause a signalized intersection to deteriorate from an acceptable LOS to an unacceptable LOS; or
- Increase the average delay by more than 5 seconds at a location that is currently operating at an unacceptable LOS without the project.

For unsignalized intersections, a project is considered to have a significant impact if it would:

- Result in an unsignalized intersection movement and/or approach operating at an acceptable LOS to deteriorate to an unacceptable LOS and also cause the intersection to meet a traffic signal warrant; or
- For an unsignalized intersection that meets a traffic signal warrant to increase the delay by more than 5 seconds at a movement/approach that is operating at an unacceptable LOS without the project.

TRAFFIC IMPACTS

EXISTING CONDITIONS AND TRIP GENERATION

New 24-hr traffic counts were conducted on Elkhorn Blvd for this study determined to carry 25,710 vehicles per day in the area of the project. New 24-hr traffic counts conducted for this analysis indicated that 32nd Street carried 5,100 vehicles per day south of Elkhorn Blvd. Elkhorn Blvd carries daily traffic volumes that are indicative of LOS D conditions, and the daily volumes on 32nd Street indicate LOS A (Table IS-2).

The signalized intersections on Elkhorn Blvd at 32nd Street and Watt Avenue operate at LOS B and LOS C or D, respectively. Motorists waiting at stop-controlled intersections on Elkhorn Blvd experience delays that range from LOS B to LOS F. Three unsignalized locations operate at LOS F, which exceeds Sacramento County's minimum LOS standard (i.e., LOS E or better), but only the Elkhorn Blvd / 28th Street intersection carries volumes that satisfy peak hour traffic signal warrants, and this location is on the Sacramento County priority list for signalization. The All Way Stop controlled intersection on 32nd Street operates at LOS A (Table IS-3).

Current peak hour 95th percentile queues were identified at signalized intersections, and the queues in the northbound left turn lane at 32nd Street and the eastbound left turn lanes at Watt Avenue exceed the available storage (Table IS-4).

SITE SPECIFIC ANALYSIS

ROADWAY SEGMENTS

For this analysis, Elkhorn Blvd is a four-lane Arterial with low access control. 32nd Street is a two-lane arterial with low access control. Table IS-2 compares roadway segment traffic volumes and Levels of Service with and without the proposed project. As shown, development of the project will increase the volume of traffic on Elkhorn Blvd and on 32nd Street. However the Level of Service will not change and conditions on each street will remain within the minimum Sacramento County Level of Service thresholds (i.e., LOS E or better); therefore, traffic impacts related to roadway segments are *less than significant*.

INTERSECTIONS

Table IS-3 displays weekday a.m. and p.m. peak hour Levels of Service at each study intersection with and without the project. As shown, while the project will add traffic through each intersection, the Project does not result in the Level of Service at any location changing from an acceptable to unacceptable condition. Where conditions already exceed the County's minimum LOS E standard the project's traffic will increase the length of delays as noted.

While the length of delay caused at three intersections operating at LOS F exceeds the permissible 5.0 second increment, traffic signal warrants are only satisfied at the Elkhorn Blvd / 28th Street intersection which is significant. The intersection is on the traffic signal priority list. Thus, while the ARCO AM/PM project is not responsible for installing a traffic signal at this location, the project would be required to contribute its

Table IS-1: Trip Generation Estimate

| Zoning or Use (Area) | Source | Unit | Trip Generation per Unit | | | | | | |
|----------------------------------|-----------|------------------|--------------------------|------------------------|-----------|-----------|------------------------|-----------|------------|
| | | | Daily Trips | AM Peak Hour Trip Rate | | | PM Peak Hour Trip Rate | | |
| | | | | In | Out | Total | In | Out | Total |
| Gas Station w/ Convenience Store | ITE (945) | Fueling Position | 205.36 | 51% | 49% | 12.47 | 51% | 49% | 13.99 |
| Elkhorn Blvd Arco | | 18 | 3,696 | 114 | 110 | 224 | 128 | 124 | 252 |
| Pass by Trips | | 50.0% | 1,848 | 71 | 68 | 139 | 72 | 69 | 141 |
| New Trips | | | 1,848 | 43 | 42 | 85 | 56 | 55 | 111 |

County Department of Transportation 2019
 Notes: VTE=vehicle trip ends VFP=vehicle fuel position KSF=1,000 square feet
 ITE=Institute of Transportation Engineers, Trip Generation, 10th Edition (Land Use No.)

Table IS-2: Existing And Existing Plus Project Conditions For Roadway Segments

| Roadway | Location | Facility Capacity Classification | Minimum Standard | | Weekday Conditions | | | | | | |
|-------------------------|--|--------------------------------------|------------------|------------------------|--------------------|-------|-----|--------------|--------|-----------|-----|
| | | | LOS | Daily Volume Threshold | Existing | | | Daily Volume | | | LOS |
| | | | | | Daily Volume | v/c | LOS | Project Only | Total | V/C Ratio | |
| 32 nd Street | Elkhorn Blvd to Q Street | 2 lane arterial, low access control | E | 15,000 | 2,985 | 0.200 | A | 65 | 3,050 | 0.203 | A |
| | Elkhorn Blvd to I Street | | | | 5,100 | 0.340 | A | 50 | 5,150 | 0.343 | A |
| Elkhorn Blvd | 26 th Street to 32 nd Street | 4 lane arterial, low access controls | E | 15,000 | 25,720 | 0.857 | D | 495 | 26,215 | 0.874 | D |
| | 32 nd Street to Watt Avenue | | | | 24,750 | 0.825 | D | 1,110 | 25,860 | 0.862 | D |

Table IS-3: Existing Conditions For Intersections

| Intersection | Control | AM Peak Hour | | | | | PM Peak Hour | | | | | Traffic Signal Warrants Met? |
|---|---------------|--------------|---------------|-----------------------|---------------|--------------|--------------|---------------|-----------------------|---------------|--------------|------------------------------|
| | | Existing | | Existing Plus Project | | | Existing | | Existing Plus Project | | | |
| | | LOS | Avg. Delay | LOS | Avg Delay | Change Delay | LOS | Avg. Delay | LOS | Avg Delay | Change Delay | |
| Elkhorn Blvd/26th Street Northbound approach Southbound approach | NB/SB Stop | C D | 15.4 30.7 | C E | 15.5 35.0 | - | C F | 19.2 106.4 | C F | 19.4 122.7 | 16.3 | No |
| Elkhorn Blvd/28th Street Southbound approach | SB Stop | F | 147.4 | F | 161.1 | 13.7 | F | 197.7 | F | 234.2 | 36.5 | Yes |
| Elkhorn -Blvd/30 th Street Southbound approach | SB stop | C | 17.3 | C | 18.2 | - | E | 43.8 | E | 48.4 | - | No |
| Elkhorn Blvd/32 nd Street | Signal | B | 14.3 | B | 17.0 | - | B | 16.8 | C | 20.9 | - | N/A |
| Elkhorn Blvd/34 th Street Northbound Approach Southbound Approach | NB/SB Stop | E F | 35.4 108.5 | E F | 41.9 126.8 | 6.5 18.3 | F F | 73.1 74.2 | F F | 91.6 88.7 | 18.5 14.5 | No |
| Elkhorn Blvd/Watt Ave | Signal | D | 37.2 | D | 38.1 | - | C | 34.7 | C | 34.9 | - | N/A |
| 32 nd Street/Q Street | AWS | A | 7.8 | A | 7.8 | - | A | 8.6 | A | 8.6 | - | No |
| 32 nd Street/ I Street | AWS | A | 8.6 | A | 8.6 | - | A | 8.4 | A | 8.4 | - | No |
| Elkhorn Blvd/Access Northbound Approach | NB Stop | - | - | B | 12.1 | - | | | C | 15.6 | - | |
| 32nd Street/Access Eastbound Approach | EB Stop | - | - | B | 12.2 | - | | | B | 13.1 | - | |
| N/A= Not applicable, NB = Northbound, SB = Southbound, AWS = All way stop, BOLD values exceed minimum LOS standard, HIGHLIGHTED values are a significant impact | | | | | | | | | | | | |

Table IS-4: Peak Hour Intersection Queuing

| Location | Lane | Storage Length (feet) | AM Peak Hour | | | | | PM Peak Hour | | | | | Exceed Storage? |
|--|-------------|-----------------------|--------------|-------------------------------|-----------------------|-------|--------------|--------------|--------------|-----------------------|-------|--------------|-----------------|
| | | | Existing | | Existing Plus Project | | | Existing | | Existing Plus Project | | | |
| | | | Vol | 95 th % Queue (ft) | Project Only | Total | Queue (feet) | Vol | Queue (feet) | Project Only | Total | Queue (feet) | |
| Elkhorn Blvd/32 nd Street | NB left | 100 | 59 | 75 | 25 | 84 | 110 | 136 | 175 | 26 | 162 | 215 | Yes |
| | NB thru | - | 6 | <25 | 1 | 7 | <25 | 105 | 135 | 1 | 106 | 145 | |
| | NB righ | 40 | 41 | <25 | 29 | 70 | 35 | 54 | <25 | 35 | 89 | 50 | |
| | EB left | 180 | 10 | <25 | 25 | 35 | 60 | 39 | 70 | 26 | 65 | 105 | |
| | EB thru | - | 791 | 250 | 5 | 796 | 295 | 1,156 | 425 | 8 | 1,164 | 495 | |
| | SB left | 100 | 52 | 70 | 0 | 52 | 80 | 52 | 85 | 0 | 52 | 90 | |
| | WB left | 190 | 64 | 80 | 67 | 131 | 155 | 54 | 90 | 72 | 126 | 175 | |
| Elkhorn Blvd/Watt Avenue | NB left (2) | 290 | 174 | 125 | 9 | 183 | 130 | 222 | 155 | 11 | 233 | 165 | |
| | SB left (2) | 300 | 69 | 60 | 0 | 69 | 60 | 137 | 105 | 0 | 392 | 295 | |
| | EB left (2) | 220 | 149 | 110 | 8 | 157 | 115 | 381 | 280 | 11 | 392 | 295 | Yes |
| | WB left (2) | 260 | 214 | 150 | 0 | 214 | 150 | 221 | 155 | 0 | 221 | 155 | |
| HIGHLIGHTED values exceed storage | | | | | | | | | | | | | |

fair share to the cost of signalization in proportion to its impact. Based on its p.m. peak hour traffic (29 vehicles), ARCO AM/PM trips represent 1.1% of the total Existing Plus Project traffic through the intersection, representing the project's fair share contribution. Mitigation has been included requiring the Project to contribute a fair share percentage towards the construction costs of signalizing the intersection. With the fair share mitigation, impacts to intersections are *less than significant*.

ACCESS AND CIRCULATION

SITE ACCESS AND INTERSECTION QUEUEING

The proposed project would be accessed from two points, one on the north side of the site on Elkhorn Blvd, and one on the east side of the project site from 32nd Street. The Elkhorn Blvd driveway would remain a right-in/right-out access; there will be no left turn movements in or out of the project site from the Elkhorn Blvd driveway.

The internal circulation system would adequately accommodate the flow of customers to and from vehicle queueing positions, on-site parking and to and from the car wash aisle. The car wash aisle accommodates 4-5 vehicles, which is adequate queueing space. Fuel delivery trucks will enter via 32nd Street and exit onto Elkhorn Blvd. Proposed driveway locations are appropriate based on proximity to the Elkhorn Blvd / 32nd Street

The length of 95th percentile queues at signalized intersections is determined as a byproduct of LOS analysis. Table IS-4 identifies peak hour traffic volumes and projected queue lengths in the lanes, and the table notes where projected queues exceed available storage. Incremental change in the status of intersection queues would increase length of peak period queues on the northbound 32nd Street approach to Elkhorn Blvd, which will in turn have a significant effect on access to the site. As indicated, the p.m. peak hour queue in the northbound left turn lane at the Elkhorn Blvd / 32nd Street intersection exceeds the available storage and could block access to the Project site. Mitigation has been included that would require the Project to install street improvements on 32nd Street beyond the standard requirement such that the left turn lane onto Elkhorn Blvd is extended to a distance that will prevent intersection queueing from interfering with access to the site; impacts are *less than significant*.

PUBLIC TRANSIT

Sacramento Regional Transit (RT) operates buses throughout the Sacramento area. The closest RT route (80) near the proposed project travels on Watt Avenue and turns right onto Elkhorn Blvd. The project would not be expected to create appreciable transit demand as the closest stop is at the Elkhorn Blvd / Watt Avenue intersection. The limited project demand would not justify altering current RT routes and impacts are *less than significant*.

PEDESTRIAN AND BICYCLE ACCESS

Sidewalks are present in the urbanized areas of Sacramento County, notably where site improvements such as residential subdivisions and commercial / retail services have been developed. Sidewalks on the west side 32nd Street connect the Project with

businesses to the south. Crosswalks and curb returns with handicap ramps exist at the 32nd Street intersection on Elkhorn Blvd, and the project will install sidewalks along its frontage.

The Sacramento County Bikeway Master Plan (2011) identifies Elkhorn Blvd as bicycle route for both local circulation and regional access with Class 2 Bike lanes. The project will provide bike racks and bike lockers and will not adversely impact the existing bicycle facilities on Elkhorn Blvd. Impacts related to pedestrian and bicycle access are *less than significant*.

AIR QUALITY

This section supplements the Initial Study Checklist by analyzing if the proposed project would:

- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard.

REGULATORY SETTING

The proposed project site is located in the Sacramento Valley Air Basin (SVAB). The SVAB’s frequent temperature inversions result in a relatively stable atmosphere that increases the potential for pollution. Within the SVAB, the Sacramento Metropolitan Air Quality Management District (SMAQMD) is responsible for ensuring that emission standards are not violated. Project related air emissions would have a significant effect if they would result in concentrations that either violate an ambient air quality standard or contribute to an existing air quality violation (Table IS-5). Moreover, SMAQMD has established significance thresholds to determine if a proposed project’s emission contribution significantly contributes to regional air quality impacts (Table IS-6).

Table IS-5: Attainment Status of Pollutants in Sacramento County

| Pollutant | State Designation | Federal Designation |
|---|-------------------|-------------------------|
| Ozone | Non-Attainment | Non-Attainment |
| Course Particulate Matter (PM ₁₀) | Non-Attainment | Attainment |
| Fine Particulate Matter (PM _{2.5}) | Non-Attainment | Non-Attainment |
| Carbon Monoxide | Attainment | Unclassified/Attainment |
| Nitrogen Dioxide | Attainment | Unclassified/Attainment |
| Sulfur Dioxide ⁴ | Attainment | Attainment |

Source CARB 2017

Table IS-6: SMAQMD Significance Thresholds

| | ROG ¹ (lbs/day) | NO _x (lbs/day) | CO (µg/m ³) | PM ₁₀ (lbs/day) | PM _{2.5} (lbs/day) |
|---------------------------|-------------------------------|------------------------------|----------------------------|-------------------------------|--------------------------------|
| Construction (short-term) | None | 85 | CAAQS ² | 80 ^{3*} | 82 ^{3*} |
| Operational (long-term) | 65 | 65 | CAAQS | 80 ^{3*} | 82 ^{3*} |

1. Reactive Organic Gas
2. California Ambient Air Quality Standards
3*. Only applies to projects for which all feasible best available control technology (BACT) and best management practices (BMPs) have been applied. Projects that fail to apply all feasible BACT/BMPs must meet a significance

SITE SPECIFIC ANALYSIS

A project specific Air Quality and Greenhouse Gas Emission analysis was conducted by Mitchell Air Quality Consulting in August 2018 (Appendix B). The analysis follows the guidance provided in the SMAQMD Guide to Air Quality Assessment in Sacramento County (SMAQMD 2018) and utilized CalEEMOD version 2016.3.2. See Appendix B for detailed modeling assumptions.

CONSTRUCTION EMISSIONS/SHORT TERM IMPACTS

Short-term air quality impacts are mostly due to dust (PM10 and PM2.5) generated by construction and development activities, and emissions from equipment and vehicle engines (NOx) operated during these activities. Dust generation is dependent on soil type and soil moisture, as well as the amount of total acreage actually involved in clearing, grubbing and grading activities. Clearing and earthmoving activities comprise the major source of construction dust generation, but traffic and general disturbance of the soil also contribute to the problem. Sand, lime or other fine particulate materials may be used during construction, and stored on-site. If not stored properly, such materials could become airborne during periods of high winds. The effects of construction activities include increased dust fall and locally elevated levels of suspended particulates. PM10 and PM2.5 are considered unhealthy because the particles are small enough to inhale and damage lung tissue, which can lead to respiratory problems.

Construction activities would be subject to SMAQMD Rule 403, which requires taking reasonable precautions to prevent the emissions of fugitive dust, such as using water or chemicals, where possible, for control of dust in the demolition of existing buildings or structures, construction operations, the construction of roadways, or the clearing of land, and applying asphalt, oil, water, or suitable chemicals on dirt roads, materials, stockpiles, and other surfaces that can give rise to airborne dust. The SMAQMD has adopted guidelines for determining potential adverse impacts to air quality in the region. The SMAQMD Guide states that construction activities are considered a potentially significant adverse impact if such activities generate total emissions in excess of SMAQMD-established thresholds (Table IS-7).

Table IS-7 illustrates the specific construction-related criteria and precursor emissions that would result from construction of the Project.

**Table IS-7: Construction-Related Criteria Pollutant and Precursor Emissions
(Maximum Pounds per Day)**

| 2020 Construction Activities | ROG | NOX | PM10 | PM2.5 |
|---|------------|---------------|--------------|---------------|
| Maximum Emissions | 4.67 | 22.79 | 3.49 | 2.10 |
| SMAQMD Potentially Significant Impact Threshold | - | 85 pounds/day | 80 pound/day | 82 pounds/day |
| Exceed SMAQMD Threshold? | - | No | No | No |

Source: CalEEMod version 2016.3.2 See Appendix B for emission model output.

As shown in Table IS-7, Project emissions resulting from construction would not exceed the SMAQMD daily significance criterion for NOX, PM10, or PM2.5, with the implementation of SMAQMD's Basic Construction Emission Control Practices. Therefore, construction-related air quality impacts are ***less than significant***.

OPERATIONAL EMISSIONS/LONG TERM IMPACTS

The SMAQMD has established significance thresholds to evaluate the potential impacts associated with long-term Project operations. Regional air pollutant emissions associated with Project operations include area source emissions, energy-use emissions, and mobile source emissions. Area source emissions comprise emissions from fuel combustion from space and water heating, landscape maintenance equipment, evaporative emissions from architectural coatings and consumer products, and unpermitted emissions from stationary sources. Energy-use emissions comprise emissions from on-site natural gas usage, and mobile source emissions comprise emissions from automobiles (e.g., trucks, cars, parking lot sweepers).

Operational area source emissions, energy-use emissions, and mobile source emissions for the proposed Project were calculated using the CalEEMod air quality model (Appendix B). Emissions rates differ from summer to winter, because weather affects factors related to air quality, such as pollutant mixing/dispersion and ozone formation. As shown in Table IS-8, project emissions resulting from long-term operations would not exceed the SMAQMD significance criteria for ROG, NOX, PM10, or PM2.5. Therefore, operational-related air quality impacts are ***less than significant***.

**Table IS-8: Operations-Related Criteria Pollutant and Precursor Emissions
(Maximum Pounds per Day)**

| Source | ROG | NOX | PM10 | PM2.5 |
|---|---------------|---------------|--------------|---------------|
| Area Source | 0.10 | 0.00 | 0.00 | 0.00 |
| Energy Source | 0.00 | 0.00 | 0.00 | 0.00 |
| Mobile Source | 8.12 | 18.37 | 3.96 | 1.11 |
| Project Total | 8.12 | 18.37 | 3.96 | 1.11 |
| SMAQMD Potentially Significant Impact Threshold | 65 pounds/day | 65 pounds/day | 80 pound/day | 82 pounds/day |
| Exceed SMAQMD Threshold? | No | No | No | No |

Source: CalEEMod version 2016.3.2. See Attachment B for emission model outputs.

HYDROLOGY AND WATER QUALITY

This section supplements the Initial Study Checklist by analyzing if the proposed project would:

- Create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems
- Create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality

FLOODING

The Federal Emergency Management Agency (FEMA) maintains and updates the National Flood Insurance Program maps, called the Federal Insurance Rate Maps (FIRM), that define areas of federal flood hazard. The Project is not within a FEMA designated 100-year flood area or 500-year flood area, but is within a local 100-year floodplain as identified by the Sacramento County Department of Water Resources (County DWR). Local floodplains in the County are typically mapped either in response to an area having flooding problems, or in response to a request by a property owner to make modifications to their parcel. Floodplains, whether local or FEMA, are regulated by the provisions of the Sacramento County Floodplain Management Ordinance, Improvement Standards, and Local Floodplain Management Plan. As such, the Project will be required to comply with the provisions of the Floodplain Management Ordinance and impacts related to flooding are ***less than significant***.

Plate IS-6: Local Flood Zone



WATER QUALITY

CONSTRUCTION WATER QUALITY: EROSION AND GRADING

Construction on undeveloped land exposes bare soil, which can be mobilized by rain or wind and displaced into waterways or become an air pollutant. Construction equipment can also track mud and dirt onto roadways, where rains will wash the sediment into storm drains and thence into surface waters. After construction is complete, various other pollutants generated by site use can also be washed into local waterways. These pollutants include; but are not limited to: vehicle fluids, heavy metals deposited by vehicles, and pesticides or fertilizers used in landscaping.

Sacramento County has a National Pollutant Discharge Elimination System (NPDES) Municipal Stormwater Permit issued by Regional Water Board. The Municipal Stormwater Permit requires the County to reduce pollutants in stormwater discharges to the maximum extent practicable and to effectively prohibit non-stormwater discharges. The County complies with this permit in part by developing and enforcing ordinances and requirements to reduce the discharge of sediments and other pollutants in runoff from newly developing and redeveloping areas of the County.

The County has established a Stormwater Ordinance (Sacramento County Code 15.12). The Stormwater Ordinance prohibits the discharge of unauthorized non-stormwater to the County's stormwater conveyance system and local creeks. It applies to all private and public projects in the County, regardless of size or land use type. In addition, Sacramento County Code 16.44 (Land Grading and Erosion Control) requires private construction sites disturbing one or more acres or moving 350 cubic yards or more of earthen material to obtain a grading permit. To obtain a grading permit, project proponents must prepare and submit for approval an Erosion and Sediment Control (ESC) Plan describing erosion and sediment control best management practices (BMPs) that will be implemented during construction to prevent sediment from leaving the site and entering the County's storm drain system or local receiving waters. Construction projects not subject to SCC 16.44 are subject to the Stormwater Ordinance (SCC 15.12) described above.

In addition to complying with the County's ordinances and requirements, construction sites disturbing one or more acres are required to comply with the State's General Stormwater Permit for Construction Activities (CGP). CGP coverage is issued by the State Water Resources Control Board (State Board) http://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.shtml and enforced by the Regional Water Board. Coverage is obtained by submitting a Notice of Intent (NOI) to the State Board prior to construction and verified by receiving a WDID#. The CGP requires preparation and implementation of a site-specific Stormwater Pollution Prevention Plan (SWPPP) that must be kept on site at all times for review by the State inspector.

Applicable projects applying for a County grading permit must show proof that a WDID # has been obtained and must submit a copy of the SWPPP. Although the County has no enforcement authority related to the CGP, the County does have the authority to ensure

sediment/pollutants are not discharged and is required by its Municipal Stormwater Permit to verify that SWPPPs include the minimum components.

The project must include an effective combination of erosion, sediment and other pollution control BMPs in compliance with the County ordinances and the State's CGP.

Erosion controls should always be the *first line of defense*, to keep soil from being mobilized in wind and water. Examples include stabilized construction entrances, tackified mulch, 3-step hydroseeding, spray-on soil stabilizers and anchored blankets. Sediment controls are the *second line of defense*; they help to filter sediment out of runoff before it reaches the storm drains and local waterways. Examples include rock bags to protect storm drain inlets, staked or weighted straw wattles/fiber rolls, and silt fences.

In addition to erosion and sediment controls, the project must have BMPs in place to keep other construction-related wastes and pollutants out of the storm drains. Such practices include, but are not limited to: filtering water from dewatering operations, providing proper washout areas for concrete trucks and stucco/paint contractors, containing wastes, managing portable toilets properly, and dry sweeping instead of washing down dirty pavement.

It is the responsibility of the project proponent to verify that the proposed BMPs for the project are appropriate for the unique site conditions, including topography, soil type and anticipated volumes of water entering and leaving the site during the construction phase. In particular, the project proponent should check for the presence of colloidal clay soils on the site. Experience has shown that these soils do not settle out with conventional sedimentation and filtration BMPs. The project proponent may wish to conduct settling column tests in addition to other soils testing on the site, to ascertain whether conventional BMPs will work for the project.

If sediment-laden or otherwise polluted runoff discharges from the construction site are found to impact the County's storm drain system and/or Waters of the State, the property owner will be subject to enforcement action and possible fines by the County and the Regional Water Board.

Project compliance with requirements outlined above, as administered by the County and the Regional Water Board will ensure that project-related erosion and pollution impacts are *less than significant*.

OPERATION: STORMWATER RUNOFF

Development and urbanization can increase pollutant loads, temperature, volume and discharge velocity of runoff over the predevelopment condition. The increased volume, increased velocity, and discharge duration of stormwater runoff from developed areas has the potential to greatly accelerate downstream erosion and impair stream habitat in natural drainage systems. Studies have demonstrated a direct correlation between the degree of imperviousness of an area and the degradation of its receiving waters. These

impacts must be mitigated by requiring appropriate runoff reduction and pollution prevention controls to minimize runoff and keep runoff clean for the life of the project.

The County requires that projects include source and/or treatment control measures on selected new development and redevelopment projects. Source control BMPs are intended to keep pollutants from contacting site runoff. Examples include “No Dumping-Drains to Creek/River” stencils/stamps on storm drain inlets to educate the public, and providing roofs over areas likely to contain pollutants, so that rainfall does not contact the pollutants. Treatment control measures are intended to remove pollutants that have already been mobilized in runoff. Examples include vegetated swales and water quality detention basins. These facilities slow water down and allow sediments and pollutants to settle out prior to discharge to receiving waters. Additionally, vegetated facilities provide filtration and pollutant uptake/adsorption. The project proponent should consider the use of “low impact development” techniques to reduce the amount of imperviousness on the site, since this will reduce the volume of runoff and therefore will reduce the size/cost of stormwater quality treatment required. Examples of low impact development techniques include pervious pavement and bioretention facilities.

The County requires developers to utilize the *Stormwater Quality Design Manual for the Sacramento Region, 2018* (Design Manual) in selecting and designing post-construction facilities to treat runoff from the project. Regardless of project type or size, developers are required to implement the minimum source control measures (Chapter 4 of the Design Manual). Low impact development measures and Treatment Control Measures are required of all projects exceeding the impervious surface threshold defined in Table 3-2 and 3-3 of the Design Manual. Further, depending on project size and location, hydromodification control measures may be required (Chapter 5 of the Design Manual).

Updates and background on the County’s requirements for post-construction stormwater quality treatment controls, along with several downloadable publications, can be found at the following websites:

<http://www.waterresources.saccounty.net/stormwater/Pages/default.aspx>

<http://www.beriverfriendly.net/Newdevelopment/>

The final selection and design of post-construction stormwater quality control measures is subject to the approval of the County Department of Water Resources; therefore, they should be contacted as early as possible in the design process for guidance. Project compliance with requirements outlined above will ensure that project-related stormwater pollution impacts are *less than significant*.

BIOLOGICAL RESOURCES

This section supplements the Initial Study Checklist by analyzing if the proposed project would:

- Have a substantial adverse effect on any special status species, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife

population to drop below self-sustaining levels, or threaten to eliminate a plant or animal community

SPECIAL STATUS SPECIES

REGULATORY SETTING

The United States Congress passed the Federal Endangered Species Act (FESA) in 1973 to protect those species that are endangered or threatened with extinction. In 1984, the State of California enacted a similar law, the California Endangered Species Act (CESA), to protect species identified and listed by the California Fish and Wildlife Commission as endangered or threatened with extinction.

The state and federal Endangered Species Acts are intended to operate in conjunction with the California Environmental Quality ACT (CEQA) and the National Environmental Policy Act (NEPA) to help protect ecosystems that endangered and threatened species depend upon. The United States Fish and Wildlife Service (USFWS) is responsible for implementation of the FESA while CDFW implements the CESA.

Accidental or intentional killing of a threatened or endangered species is labeled "take". "Take" is defined as "to harass, harm, pursue, hunt, shoot, would, kill, trap, capture, or collect" any threatened or endangered wildlife species. Take may include significant habitat modification or degradation and is applied to threatened and endangered plant species as well.

Incidental take to an otherwise lawful activity may be authorized by one of two procedures. If a federal agency is involved with the permitting, funding, or carrying out of the project, then initiation of formal consultation between that agency and USFWS pursuant to Section 7 of the FESA is required if proposed project may affect a federally listed species. Such consultation would result in a biological opinion that addresses the anticipated effects of the project to listed species and may authorize a limited level of incidental take. If a federal agency is not involved with the project, and federally listed species may be taken as part of the project, then an incidental take permit pursuant to Section 10(a) of the FESA must be obtained. The USFWS may issue such a permit upon completion of a satisfactory conservation plan for any listed species that would be affected by the project. The current project does not involve federal funding.

Under CEQA, species officially proposed for listing (federal classification), candidate species (federal and state classification), species of special concern (State of California classification) and species of concern (federal classification) are fully protected. Plants identified as "1B" by the California Native Plant Society are also afforded protection pursuant to CEQA.

Raptors and their active nests are protected by the California Fish and Game Code Section 3503.5, which states: It is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds of prey, or raptors) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto. Section 3(18) of the Federal Endangered

Species Act defines the term “take” means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. Causing a bird to abandon an active nest may cause harm to egg(s) or chick(s) and is therefore considered “take.” Thus, take may occur both as a result of cutting down a tree or as a result of activities nearby an active nest which cause nest abandonment.

SITE-SPECIFIC ANALYSIS

The project site itself does not contain habitat for special status species. The CNDDDB query revealed that the nearest documented special status species occurrences are along the Dry Creek Parkway. The site is adjacent to larger vacant and agricultural residential parcels that contain large trees that could provide nesting habitat for Swainson’s hawk (*Buteo swainsoni*) and other raptors.

The Swainson’s hawk is listed as a threatened species by the State of California and is a candidate for federal listing as threatened or endangered. It is a migratory raptor typically nesting in or near valley floor riparian habitats during spring and summer months. Swainson’s hawks were once common throughout the state, but various habitat changes, including the loss of nesting habitat (trees) and the loss of foraging habitat through the conversion of native Central Valley grasslands to certain incompatible agricultural and urban uses has caused an estimated 90% decline in their population.

The CEQA analysis provides a means by which to ascertain impacts to the Swainson’s hawk. When the analysis identifies impacts, mitigation measures are established that will reduce impacts to the species to a less than significant level. Project proponents are cautioned that the mitigation measures are designed to reduce impacts and do not constitute an incidental take permit under the California Endangered Species Act (CESA). Anyone who directly or incidentally takes a Swainson’s hawk, even when in compliance with mitigation measures established pursuant to CEQA, may violate the California Endangered Species Act.

For determining impacts to and establishing mitigation for nesting Swainson’s hawks in Sacramento County, California Department of Fish and Wildlife (CDFW) recommends implementing the measures set forth in the California Fish and Wildlife Staff Report Regarding Mitigation for Impacts to Swainson’s Hawks (*Buteo swainsoni*) in the Central Valley of California (November 1, 1994). These state that no intensive new disturbances, such as heavy equipment operation associated with construction, should be initiated within ¼-mile of an active Swainson’s hawk nest in an urban setting or within ½-mile in a rural setting between March 1 and September 15.

This section also addresses other raptors which are not listed as endangered, threatened, or of special concern, but are nonetheless afforded general protections by the Fish and Game Code. Raptors within the Sacramento region include tree-nesting species such as the red-tailed hawk and red-shouldered hawk, as well as ground-nesting species such as the northern harrier. The following raptor species are identified as “special animals” due to concerns over nest disturbance: Cooper’s hawk, sharp-shinned hawk, golden eagle, northern harrier, and white-tailed kite.

To avoid impacts to nesting raptors, mitigation involves pre-construction nesting surveys to identify any active nests and to implement avoidance measures if nests are found – if construction will occur during the nesting season of March 1 to September 15. The purpose of the survey requirement is to ensure that construction activities do not agitate or harm nesting raptors, potentially resulting in nest abandonment or other harm to nesting success. If nests are found, the developer is required to contact California Fish and Wildlife to determine what measures need to be implemented in order to ensure that nesting raptors remain undisturbed. The measures selected will depend on many variables, including the distance of activities from the nest, the types of activities, and whether the landform between the nest and activities provides any kind of natural screening. If no active nests are found during the focused survey, no further mitigation will be required. Mitigation will ensure that impacts to Swainson's hawk and other nesting raptors will be *less than significant*.

CULTURAL RESOURCES

This section supplements the Initial Study Checklist by analyzing if the proposed project would:

- Have a substantial adverse effect on an archeological resources.
- Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074.

ARCHEOLOGICAL RESOURCES

A review of the files maintained at the North Central Information Center of the California Historical Resources Information System was conducted on August 23, 2018. There are no prehistoric or historic period resources recorded in or within a 0.125-mile radius of the project area. The property was surveyed for cultural resources in the past.

A check of the Sacred Lands file has been conducted for the project site through the Native American Heritage Commission (NAHC), with a response received from Sharaya Souza of that agency dated August 24, 2018. There are no sites listed on the Sacred Lands file in or near the project area.

The project was inspected on foot by Robert Gerry of Peak & Associates on August 27, 2018. There are no prehistoric period sites within the project boundaries. There are no standing structures or foundations within the project area. There are no identified cultural resources in the project area so no mitigation directed to specific resources is needed. There is always a possibility that a site may exist in the project area and be obscured by later ground disturbing activities.

TRIBAL CULTURAL RESOURCES

Pursuant to AB-52, Sacramento County sent notification letters on January 24, 2019, to three local tribes upon initiation of environmental review for the project. Two Tribes – United Auburn Indian Community and the Wilton Rancheria, expressed interest in the project and requested tribal consultation.

Sacramento County met with Wilton Rancheria on April 11, 2019 to discuss the project and potential tribal cultural resources. The Tribe noted that it is possible to encounter tribal cultural resources during ground excavation, particularly during excavation for the underground storage tanks.

On February 6, 2019, the United Auburn Indian Community sent a letter with requested mitigation measures to ensure protection of undiscovered Tribal Resources and concluded consultation.

CULTURAL AND TRIBAL RESOURCES SITE SPECIFIC IMPACT CONCLUSION

No historical or prehistoric resources were identified within or adjacent to the project site. No additional work is recommended at this time. The likelihood of encountering buried sites and or archeological resources within the project site is considered low. However, any time that soil is excavated, archeological materials or Tribal Resources could be uncovered. In addition to standard mitigation language for protection and treatment of unanticipated discoveries, mitigation is included to allow tribal monitors to conduct spot checks during excavation of the storage tanks, and a worker awareness training brochure is included as Appendix C. Impacts to cultural and Tribal Resources are considered *less than significant*.

HAZARDS AND HAZARDOUS MATERIALS

This section supplements the Initial Study Checklist by analyzing if the proposed project would:

- Create a substantial hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- Expose the public or the environment to a substantial hazard through reasonably foreseeable upset conditions involving the release of hazardous materials?
- Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, resulting in a substantial hazard to the public or environment?

REGULATORY SETTING

The proposed project will include two underground fuel storage tanks. The bottom depth of the tanks is at 15'-6" below the ground surface with 5'-0" of earth covering the tops of the tanks. The tanks are one 25,000 gallon unleaded tank and (1) 22,000 gallon mid-grade/premium split tank. Installation of underground fuel storage tanks is regulated by local, state, and federal hazardous materials regulations. The Hazardous Materials Division of the Sacramento County Environmental Management Department has been designated by the California Environmental Protection Agency (CalEPA) as the Certified Unified Program Agency (CUPA) for Sacramento County.

As the CUPA, the Environmental Compliance Division is responsible for the implementation of six statewide environmental programs for Sacramento County, including underground storage of hazardous substances. Program implementation involves permitting and inspection of regulated facilities, providing educational guidance and notice of changing requirements stipulated in State or Federal laws and regulations, investigations of complaints regarding spills or unauthorized releases and administrative enforcement actions levied against facilities that have violated applicable laws and regulations. The CUPA also coordinates with State and Federal agencies during the remediation process, when protective measures fail and a release occurs.

The U.S. Environmental Protection Agency (EPA) designed part of the technical regulations for underground storage tank (UST) systems to prevent releases from USTs. The regulations require USTs to be protected from spills, overfills, and corrosion.

UNDERGROUND STORAGE TANK DESIGN STANDARDS

New Underground Storage Tanks (USTs) are held to rigorous design standards to minimize the possibility of releasing hazardous materials. There are three basic causes of release, including spills, overfilling, and/or tank corrosion. Each of these causes can be addressed and theoretically prevented by design standards and practices.

Many UST releases occur during the fuel delivery process. These releases are usually the result of human error and can be avoided with the proper application of industry standard practices for tank filling. There are also design features that can offset human error, such as catchment basins (essentially, a bucket sealed around the fill pipe) to contain small spills.

Overfilling can also occur due to mistakes in the fuel delivery process, and large volumes of material can be released at the fill pipe and through loose fittings at the top of the tank or through a loose vent pipe. New USTs are required to include overfill protection devices during installation. These devices include an automatic shutoff, overfill alarms, and ball float valves (a device which restricts the amount of vapor that flows into a vent line during the fueling process).

Unprotected, underground metal components of the UST system can corrode and release hazardous material into the environment. Corrosion can begin as pitting in the metal surface, and as the pitting becomes deeper, holes may develop. In addition to tanks and piping, metal components can include flexible connectors, swing joints, and turbines. All metal UST system components that are in contact with the ground and routinely contain product must be protected from corrosion. All USTs installed after December 22, 1988 must meet one of the following performance standards for corrosion protection:

- Tank and piping completely made of noncorrosive material, such as fiberglass-reinforced plastic
- Tank and piping made of steel having a corrosion-resistant coating AND having cathode protection

- Tank made of steel clad with a thick layer of noncorrosive material (this option does not apply to piping)
- Tank and piping are installed without additional corrosion protection measures provided that a corrosion expert has determined that the site is not corrosive enough to cause a release due to corrosion during its operating life and owner/operators maintain records that demonstrate compliance with this requirement
- Tank and piping construction and corrosion protection are determined by the implementing agency to be designed to prevent the release or threatened release of any stored, regulated substance in a manner that is no less protective of human health and the environment than the options listed above.

UST systems must also be designed, constructed, and installed in accordance with a national code of practice and according to manufacturer's instructions. Furthermore, all regulated tanks and piping must have release detection so that leaks are discovered quickly before contamination spreads from the UST site. Every UST system must include release detection (often also called "leak" detection) that meets three basic requirements:

1. Leaks can be detected from any portion of the tank or its piping that routinely contains petroleum;
2. Leak detection is installed, calibrated, operated, and maintained in accordance with the manufacturer's instructions; and
3. Leak detection meets the performance requirements described in the federal regulations.

Current design standards and regulatory oversight ensure that the potential for soil and groundwater contamination through tank leakage is significantly reduced when compared to older standards. Furthermore, if a release does occur, there are standard site remediation procedures that would be initiated to determine the extent of contamination and to clean up the site.

While some contact with petroleum can be harmful to human health, the presence of this hazardous material is not in and of itself an impact. Only a release great enough to cause off-site contamination that exposes the public to risk (such as the contamination of a drinking water well) would constitute an impact. For situations such as this, significance is determined by the probability that an impact would ever occur at all. This same type of analysis is made for flooding. The regulatory oversight of USTs, the rigorous tank design standards, required practices and established remediation programs should ensure that the probability of a serious release is extremely low. Therefore, impacts due to hazardous materials storage will be ***less than significant***.

GREENHOUSE GAS EMISSIONS

This section supplements the Initial Study Checklist by analyzing if the proposed project would:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

Certain gases in the earth’s atmosphere, classified as GHGs, play a critical role in determining the earth’s surface temperature. Solar radiation enters the earth’s atmosphere from space. A portion of the radiation is absorbed by the earth’s surface and a smaller portion of this radiation is reflected back toward space. This absorbed radiation is then emitted from the earth as low-frequency infrared radiation. The frequencies at which bodies emit radiation are proportional to temperature. Because the earth has a much lower temperature than the sun, it emits lower-frequency radiation. Most solar radiation passes through GHGs; however, infrared radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead “trapped,” resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on earth. Without the greenhouse effect, the earth would not be able to support life as we know it.

Table IS-9 describes the primary GHGs attributed to global climate change, including their physical properties, primary sources, and contributions to the greenhouse effect.

Table IS-9: Greenhouse Gases

| Greenhouse Gas | Description |
|-----------------------------------|--|
| Carbon Dioxide (CO ₂) | Carbon dioxide is a colorless, odorless gas. CO ₂ is emitted in a number of ways, both naturally and through human activities. The largest source of CO ₂ emissions globally is the combustion of fossil fuels such as coal, oil, and gas in power plants, automobiles, industrial facilities, and other sources. A number of specialized industrial production processes and product uses such as mineral production, metal production, and the use of petroleum-based products can also lead to CO ₂ emissions. The atmospheric lifetime of CO ₂ is variable because it is so readily exchanged in the atmosphere. ¹ |
| Methane (CH ₄) | Methane is a colorless, odorless gas and is the major component of natural gas, about 87 percent by volume. It is also formed and released to the atmosphere by biological processes occurring in anaerobic environments. Methane is emitted from a variety of both human-related and natural sources. Human-related sources include fossil fuel production, animal husbandry (intestinal fermentation in livestock and manure management), rice cultivation, biomass burning, and waste management. These activities release significant quantities of CH ₄ to the atmosphere. Natural sources of CH ₄ include wetlands, gas hydrates, permafrost, termites, oceans, freshwater bodies, non-wetland soils, and other sources such as wildfires. The atmospheric lifetime of CH ₄ is about 12 years. ² |
| Nitrous Oxide (N ₂ O) | Nitrous oxide is a clear, colorless gas with a slightly sweet odor. Nitrous oxide is produced by both natural and human-related sources. Primary human-related sources of N ₂ O are agricultural soil management, animal manure management, sewage treatment, mobile and stationary combustion of fossil fuels, adipic acid production, and nitric acid production. N ₂ O is also produced naturally from a wide variety of biological sources in soil and water, particularly microbial action in wet tropical forests. The atmospheric lifetime of N ₂ O is approximately 120 years. ³ |

Sources: ¹EPA 2019

Each GHG differs in its ability to absorb heat in the atmosphere based on the lifetime, or persistence, of the gas molecule in the atmosphere. CH₄ traps over 25 times more heat per molecule than CO₂, and N₂O absorbs 298 times more heat per molecule than CO₂. Often, estimates of GHG emissions are presented in carbon dioxide equivalents (CO₂e), which weight each gas by its global warming potential (GWP). Expressing GHG emissions in CO₂e takes the contribution of all GHG emissions to the greenhouse effect

and converts them to a single unit equivalent to the effect that would occur if only CO₂ were being emitted.

Climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants, which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (about one day), GHGs have long atmospheric lifetimes (one to several thousand years). GHGs persist in the atmosphere for long enough time periods to be dispersed around the globe. Although the exact lifetime of any particular GHG molecule is dependent on multiple variables and cannot be pinpointed, it is understood that more CO₂ is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, or other forms.

Of the total annual human-caused CO₂ emissions, approximately 55 percent is sequestered through ocean and land uptakes every year, averaged over the last 50 years, whereas the remaining 45 percent of human-caused CO₂ emissions remains stored in the atmosphere.

The quantity of GHGs that it takes to ultimately result in climate change is not precisely known; suffice it to say the quantity is enormous, and no single project alone would measurably contribute to a noticeable incremental change in the global average temperature or to global, local, or microclimates. From the standpoint of CEQA, GHG impacts to global climate change are inherently cumulative.

SOURCES OF GREENHOUSE GAS EMISSIONS

In June 2017, CARB released the 2017 edition of the California GHG inventory covering calendar year 2015 emissions. In 2015, California emitted 440.4 million gross metric tons of CO₂e including from imported electricity. Combustion of fossil fuel in the transportation sector was the single largest source of California's GHG emissions in 2015, accounting for approximately 37 percent of total GHG emissions in the state. This sector was followed by the industrial sector (21 percent) and the electric power sector (including both in-state and out-of-state sources) (19 percent).

Emissions of CO₂ are by-products of fossil fuel combustion. CH₄, a highly potent GHG, primarily results from off-gassing (the release of chemicals from nonmetallic substances under ambient or greater pressure conditions) and is largely associated with agricultural practices and landfills. N₂O is also largely attributable to agricultural practices and soil management. Carbon dioxide sinks, or reservoirs, include vegetation and the ocean, which absorb CO₂ through sequestration and dissolution (CO₂ dissolving into the water), respectively, two of the most common processes for removing carbon dioxide from the atmosphere.

REGULATORY SETTING

STATE

Executive Order S-3-05 Executive Order (EO) S-3-05, signed by Governor Arnold Schwarzenegger in 2005, proclaims that California is vulnerable to the impacts of climate change. It declares that increased temperatures could reduce the Sierra Nevada snowpack, further exacerbate California's air quality problems, and potentially cause a rise in sea levels. To combat those concerns, the executive order established total GHG emission targets for the state. Specifically, emissions are to be reduced to the 2000 level by 2010, the 1990 level by 2020, and to 80 percent below the 1990 level by 2050. While dated, this executive order remains relevant because a more recent California Appellate Court decision, *Cleveland National Forest Foundation v. San Diego Association of Governments* (November 24, 2014) 231 Cal.App.4th 1056, examined whether it should be viewed as having the equivalent force of a legislative mandate for specific emissions reductions. While the California Supreme Court ruled that the San Diego Association of Governments did not abuse its discretion by declining "to adopt the 2050 goal as a measure of significance in light of the fact that the Executive Order does not specify any plan or implementation measures to achieve its goal, the decision also recognized that the goal of a 40 percent reduction in 1990 GHG levels by 2030 is "widely acknowledged" as a "necessary interim target to ensure that California meets its longer-range goal of reducing greenhouse gas emissions 80 percent below 1990 levels by the year 2050.

ASSEMBLY BILL 32, THE CALIFORNIA GLOBAL WARMING SOLUTIONS ACT OF 2006

In September 2006, Governor Schwarzenegger signed the California Global Warming Solutions Act of 2006, Assembly Bill (AB) 32. AB 32 establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and a cap on statewide GHG emissions. AB 32 requires that statewide GHG emissions be reduced to 1990 levels by 2020. AB 32 also requires that these reductions "...shall remain in effect unless otherwise amended or repealed. (b) It is the intent of the Legislature that the statewide greenhouse gas emissions limit continue in existence and be used to maintain and continue reductions in emissions of greenhouse gases beyond 2020. (c) The [Air Resources Board] shall make recommendations to the Governor and the Legislature on how to continue reductions of greenhouse gas emissions beyond 2020." [California Health and Safety Code, Division 25.5, Part 3, Section 38551]

ASSEMBLY BILL 32 CLIMATE CHANGE SCOPING PLAN AND UPDATES

In December 2008, CARB adopted its Climate Change Scoping Plan, which contains the main strategies California will implement to achieve reduction of approximately 118 million metric tons of CO₂e emissions, or approximately 21.7 percent from the State's projected 2020 emission level of 545 million metric tons of CO₂e under a business-as-usual scenario (this is a reduction of 47 million metric tons of CO₂e, or almost 10 percent, from 2008 emissions). In May 2014, CARB released and subsequently adopted the First Update to the Climate Change Scoping Plan to identify the next steps in reaching AB 32 goals and evaluate progress that has been made between 2000 and 2012. According to the update, California is on track to meet the near-term 2020 GHG

limit and is well positioned to maintain and continue reductions beyond 2020. The update also reports the trends in GHG emissions from various emissions sectors (e.g., transportation, building energy, agriculture).

On January 20, 2017, CARB released its proposed 2017 Climate Change Scoping Plan Update (2017 Scoping Plan Update), which lays out the framework for achieving the 2030 reductions as established in more recent legislation (discussed below). The proposed 2017 Scoping Plan Update identifies the GHG reductions needed by each emissions sector to achieve a statewide emissions level that is 40 percent below 1990 levels before 2030.

The proposed update also identifies how GHGs associated with proposed projects could be evaluated under CEQA. Specifically, it states that achieving “no net increase” in GHG emissions is the correct overall objective of projects evaluated under CEQA if conformity with an applicable local GHG reduction plan cannot be demonstrated. CARB recognizes that it may not be appropriate or feasible for every development project to mitigate its GHG emissions to no net increase and that this may not necessarily imply a substantial contribution to the cumulatively significant environmental impact of climate change.

EXECUTIVE ORDER B-30-15

On April 20, 2015 Governor Brown signed Executive Order B-30-15 to establish a California GHG reduction target of 40 percent below 1990 levels by 2030. The Governor’s executive order aligns California’s GHG reduction targets with those of leading international governments such as the 28- nation European Union, which adopted the same target in October 2014. California is on track to meet or exceed the target of reducing GHG emissions to 1990 levels by 2020, as established in the California Global Warming Solutions Act of 2006 (AB 32, discussed above). California’s new emission reduction target of 40 percent below 1990 levels by 2030 will make it possible to reach the ultimate goal of reducing emissions 80 percent below 1990 levels by 2050. This is in line with the scientifically established levels needed in the U.S. to limit global warming below 2 degrees Celsius, the warming threshold at which major climate disruptions are projected, such as super droughts and rising sea levels.

SENATE BILL 32 AND ASSEMBLY BILL 197 OF 2016

In August 2016, Governor Brown signed SB 32 and AB 197, which serve to extend California’s GHG reduction programs beyond 2020. SB 32 amended the Health and Safety Code to include Section 38566, which contains language to authorize CARB to achieve a statewide GHG emission reduction of at least 40 percent below 1990 levels by no later than December 31, 2030. SB 32 codified the targets established by EO B-30-15 for 2030, which set the next interim step in the State’s continuing efforts to pursue the long-term target expressed in EOs S-3-05 and B-30-15 of 80 percent below 1990 emissions levels by 2050.

SENATE BILL X1-2 OF 2011 AND SENATE BILL 350 OF 2015

SB X1-2 of 2011 requires all California utilities to generate 33 percent of their electricity from renewables by 2020. SB X1-2 sets a three-stage compliance period requiring all California utilities, including independently-owned utilities, energy service providers, and community choice aggregators, to generate 20 percent of their electricity from renewables by December 31, 2013; 25 percent by December 31, 2016; and 33 percent by December 31, 2020. SB X1-2 also requires the renewable electricity standard to be met increasingly with renewable energy that is supplied to the California grid from sources within, or directly proximate to, California. SB X1-2 mandates that renewables from these sources make up at least 50 percent of the total renewable energy for the 2011-2013 compliance period, at least 65 percent for the 2014-2016 compliance period, and at least 75 percent for 2016 and beyond. In October 2015, SB 350 was signed by Governor Brown, which requires retail sellers and publicly-owned utilities to procure 50 percent of their electricity from renewable resources by 2030.

REGIONAL

COUNTY OF SACRAMENTO CLIMATE ACTION PLANNING

In October of 2011 Sacramento County approved the Climate Action Plan Strategy and Framework document (CAP), which is the first phase of developing a community-level Climate Action Plan. The CAP provides a framework and overall policy strategy for reducing greenhouse gas emissions and managing our resources in order to comply with AB 32. It also highlights actions already taken to become more efficient, and targets future mitigation and adaptation strategies. The CAP contains policies/goals related to agriculture, energy, transportation/land use, waste, and water.

As part of the CAP, Sacramento County prepared a GHG emissions inventory and based on this inventory, developed GHG significance thresholds for land use development projects. As shown in Table IS-13 below, separate thresholds have been included for the Energy sector and Transportation/Land Use sector, the two most potent sources of GHG emissions. The purpose of this division is to provide additional information about the source of emissions.

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT (SMAQMD)

The SMAQMD has primary responsibility for developing and implementing rules and regulations to maintain the national ambient air quality standards and attain the California ambient air quality standards, permitting new or modified sources, developing air quality management plans, and adopting and enforcing air pollution regulations for all projects in the Sacramento Valley Air Basin. The AB 32 Scoping Plan does not specify an explicit role for local air districts with respect to implementing AB 32, but it does state that CARB will work actively with air districts in coordinating emissions reporting, encouraging and coordinating GHG reductions, and providing technical assistance in quantifying reductions. The ability of air districts to control emissions (both criteria pollutants and GHGs) is provided primarily through permitting, but also via their role as a CEQA lead or commenting agency, the establishment of CEQA thresholds, and the development of analytical requirements for CEQA documents.

SACRAMENTO AREA COUNCIL OF GOVERNMENTS (SACOG)

SACOG’s Metropolitan Transportation Plan/Sustainable Communities Strategy 2016 (MTP/SCS) is the latest update of a long-range policy and planning program that establishes GHG emissions goals for automobiles and light-duty trucks for 2020 and 2035, and thus establishes an overall GHG target for the region beyond 2020 applicable to these subsectors of the transportation sector. SACOG was tasked by CARB to achieve a 9 percent per capita reduction compared to 2012 vehicle emissions by 2020, and a 16 percent per capita reduction by 2035, which CARB confirmed the region would achieve by implementing its MTP/SCS (CARB 2013).

THRESHOLDS OF SIGNIFICANCE

Addressing GHG generation impacts requires an agency to make a determination as to what constitutes a significant impact. Governor’s Office of Planning and Research’s (OPR’s) Guidance does not include a quantitative threshold of significance to use for assessing a proposed development’s GHG emissions under CEQA. Moreover, CARB has not established such a threshold or recommended a method for setting a threshold for proposed development-level analysis.

Table IS-10: County of Sacramento Greenhouse Gas Emissions Significance Thresholds

(Annual Metric Tons of CO₂e)

| Land Use Sector Threshold | Threshold |
|--------------------------------|---|
| Energy | |
| Residential Energy | 1.33 Metric Tons per Capita |
| Commercial / Industrial Energy | 7.87 Metric Tons per Thousand Square Feet |
| Transportation | |
| Commercial | 2.67 Metric Tons per Capita |

Table IS-11: Sacramento Metropolitan Air Quality Management District Threshold of Significance for Greenhouse Gases

| Land Development and Construction Projects | | |
|--|----------------------------|-----------------------------|
| | Construction Phase | Operational Phase |
| Greenhouse Gas as CO ₂ e | 1,100 metric tons per year | 1,100 metric tons per year |
| Stationary Source Only | | |
| | Construction Phase | Operational Phase |
| Greenhouse Gas as CO ₂ e | 1,100 metric tons per year | 10,000 metric tons per year |

Thresholds applicable to construction activities have not been developed by the County of Sacramento. Therefore, this analysis will rely on the SMAQMD's construction-related numeric bright-line mass emission threshold of 1,100 metric tons of CO₂e annually (SMAQMD is the air pollution officer for the Project region).

In order to assess post-2020 impacts, the development is compared to SACOG's MTP/SCS. As previously stated, SACOG's 2016 MTP/SCS is a long-range policy and planning program that establishes GHG emissions goals for automobiles and light-duty trucks for 2020 and 2035, and thus establishes an overall GHG target for the region beyond 2020 applicable to these subsectors of the transportation sector. SACOG was tasked by CARB to achieve a 9 percent per capita reduction compared to 2012 vehicle emissions by 2020, and a 16 percent per capita reduction by 2035, which CARB confirmed the region would achieve by implementing its MTP/SCS (CARB 2013). While this target cannot be directly translated to an overall threshold given that it is geared specifically toward GHG emissions from only a subsector of GHG sources (i.e., the transportation emissions sector), the proposed Project will generate vehicle trips, and as shown in Table IS-13, GHG emissions resulting from the Project is the most potent source of emissions. Therefore, comparing the proposed Project to the MTP/SCS is an appropriate indicator describing whether the development would inhibit achievement of the post-2020 GHG reduction goals promulgated by the state. The development would be considered to result in a significant impact if it is shown to be inconsistent with SACOG's 2016 MTP/SCS.

METHODOLOGY

Mitchell Air Quality Consulting calculated the resultant GHG emissions of the Project using the CalEEMod, version 2016.3.2, computer program (Appendix B). CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for the use of government agencies, land use planners, and environmental professionals. This model is the most current emissions model approved for use in California by the SMAQMD.

SITE SPECIFIC ANALYSIS

CONSTRUCTION-GENERATED GREENHOUSE GAS EMISSIONS

GHG emissions associated with the Project would occur over the short term from construction activities, consisting primarily of emissions from equipment exhaust. Table IS-12 illustrates the specific construction-generated GHG emissions that would result from construction of the Project.

Table IS-12: Construction-Related Greenhouse Gas Emissions (Metric Tons per Year)

| Emissions Source | CO ₂ e |
|-------------------------------|-------------------|
| Year One | 168.35 |
| SMAQMD Construction Threshold | 1,100 |
| Exceeds Threshold? | No |

Source: CalEEMod version 2016.3.2. See Appendix B for emission model outputs.

As shown in Table IS-12, Project construction would result in the generation of approximately 168.35 metric tons of CO₂e during construction. Once construction is complete, the generation of these GHG emissions would cease. Annual construction emissions generated by the development would not exceed the SMAQMD construction-related, numeric threshold of 1,100 metric tons of CO₂e.

OPERATIONAL-GENERATED GREENHOUSE GAS EMISSIONS

Operation of the Project would result in GHG emissions predominantly associated with motor vehicle use. Table IS-13 summarizes all the direct and indirect annual GHG emissions level associated with the Project.

Table IS-13: Operational-Related Greenhouse Gas Emissions (Metric Tons per Year)

| Emissions Source | CO ₂ e |
|-----------------------------------|-------------------|
| Area Source (landscaping, hearth) | 0.0 |
| Energy | 12.91 |
| Mobile | 679.69 |
| Waste | 3.61 |
| Water | 0.41 |
| Total | 696.61 |

Source: CalEEMod version 2016.3.2. See Appendix B, Attachment B for emission model outputs.

As shown in Table IS-13, the Project would produce 696.61 metric tons of CO₂e annually, primarily from motor vehicles that travel to and from the site.

PROJECT GHG EMISSIONS CONSISTENCY WITH THE METROPOLITAN TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY 2035 (MTP/SCS)

SACOG's MTP/SCS establishes GHG emissions goals for automobiles and light-duty trucks. As shown in Table IS-13, GHG emissions resulting from Project-related transportation sources is the most potent source of emissions, and therefore comparison to the MTP/SCS is an appropriate indicator of whether the Project is

consistent with the MTP/SCS. Since the development site is classified as a “Established Community” in the MTP/SCS, it is included in an area where urban development already exists. Therefore, the development is consistent with the MTP/SCS and it can be assumed that regional mobile emissions will decrease in line with the goals of the MTP/SCS with implementation of the development. While the Project would generate GHG emissions, implementing SACOG’s MTP/SCS will greatly reduce the regional GHG emissions from transportation, and the development will not obstruct the achievement of the MTP/SCS emission reduction targets. Since the development is consistent with SACOG’s 2016 MTP/SCS, the development would not result in an increase in the severity of operational GHG emission-related impacts. Impacts are *less than significant*.

ENVIRONMENTAL MITIGATION MEASURES

Mitigation Measures A and B are critical to ensure that identified significant impacts of the project are reduced to a level of less than significant. Pursuant to Section 15074.1(b) of the CEQA Guidelines, each of these measures must be adopted exactly as written unless both of the following occur: (1) A public hearing is held on the proposed changes; (2) The hearing body adopts a written finding that the new measure is equivalent or more effective in mitigating or avoiding potential significant effects and that it in itself will not cause any potentially significant effect on the environment.

As the applicant, or applicant’s representative, for this project, I acknowledge that project development creates the potential for significant environmental impact and agree to implement the mitigation measures listed below, which are intended to reduce potential impacts to a less than significant level.

Applicant [Original Signature on File] _____ Date: _____

MITIGATION MEASURE A: TRAFFIC IMPACTS ON ELKHORN BLVD AND 28TH STREET

Prior to approval of improvement plans, the applicant shall pay Sacramento County Department of Transportation a fair share contribution to the cost of signaling the Elkhorn Blvd and 28th Street intersection. Based on analysis herein, the fair share cost amount is estimated to be 1.1% of the total cost of signaling the intersection.

MITIGATION MEASURE B: INTERSECTION QUEUING

The Project shall increase the available storage in the northbound approach to Elkhorn Blvd on 32nd Street by lengthening the left hand turn lane to provide additional queue storage. The northbound left turn lane shall be extended sufficiently to accommodate 215 feet of vehicle storage length. The Project shall be responsible for all necessary road widening, utility relocation, and additional improvements that may be required as a result of extending the left hand turn lane.

MITIGATION MEASURE C: SWAINSON'S HAWK NESTING HABITAT AND NESTING RAPTORS

If construction, grading, or project-related improvements are to commence between March 1 and September 15, a focused survey for Swainson's hawk nests on the site and within ¼ mile of the site shall be conducted by a qualified biologist no later than 30 days prior to the start of construction work (including clearing and grubbing). If active nests are found, the California Fish and Wildlife shall be contacted to determine appropriate protective measures, and these measures shall be implemented prior to the start of any ground-disturbing activities. If no active nests are found during the focused survey, no further mitigation will be required.

MITIGATION MEASURE D: POST GROUND DISTURBANCE SITE VISIT

A minimum of seven days prior to beginning earthwork or other soil disturbance activities, the applicant shall notify the United Auburn Indian Community (UAIC) and Wilton Rancheria. A tribal representative from UAIC and Wilton Rancheria shall be invited to inspect the project site, including any soil piles, trenches, or other disturbed areas, within the first five days of excavation for the underground fuel tanks. During this inspection, a site meeting of construction personnel shall also be held in order to afford the tribal representative the opportunity to provide tribal cultural resources awareness information.

MITIGATION MEASURE E: CULTURAL RESOURCES UNANTICIPATED DISCOVERY

In the event that human remains are discovered in any location other than a dedicated cemetery, work shall be halted and the County Coroner contacted. For all other unexpected cultural resources discovered during project construction, work shall be halted until a qualified archaeologist may evaluate the resource encountered.

1. Pursuant to Sections 5097.97 and 5097.98 of the State Public Resources Code, and Section 7050.5 of the State Health and Safety Code, if a human bone or bone of unknown origin is found during construction, all work is to stop and the County Coroner and the Office of Planning and Environmental Review shall be immediately notified. If the remains are determined to be Native American, the coroner shall notify the Native American Heritage Commission within 24 hours, and the Native American Heritage Commission shall identify the person or persons it believes to be the most likely descendent from the deceased Native American. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposition of, with appropriate dignity, the human remains and any associated grave goods.
2. In the event of an inadvertent discovery of cultural resources (excluding human remains) during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the

Interior's Professional Qualification Standards for prehistoric and historic archaeology, shall be retained at the Applicant's expense to evaluate the significance of the find. If it is determined due to the types of deposits discovered that a Native American monitor is required, the Guidelines for Monitors/Consultants of Native American Cultural, Religious, and Burial Sites as established by the Native American Heritage Commission shall be followed, and the monitor shall be retained at the Applicant's expense.

- a. Work cannot continue within the 100-foot radius of the discovery site until the archaeologist and/or tribal monitor conducts sufficient research and data collection to make a determination that the resource is either 1) not cultural in origin; or 2) not potentially eligible for listing on the National Register of Historic Places or California Register of Historical Resources.
- b. If a potentially-eligible resource is encountered, then the archaeologist and/or tribal monitor, Planning and Environmental Review Division staff, and project proponent shall arrange for either 1) total avoidance of the resource, if possible; or 2) test excavations or total data recovery as mitigation. The determination shall be formally documented in writing and submitted to the County Environmental Coordinator as verification that the provisions of CEQA for managing unanticipated discoveries have been met.

MITIGATION MEASURE COMPLIANCE

Comply with the Mitigation Monitoring and Reporting Program (MMRP) for this project as follows:

1. The proponent shall comply with the MMRP for this project, including the payment of a fee to cover the Office of Planning and Environmental Review staff costs incurred during implementation of the MMRP. The MMRP fee for this project is \$3,500. This fee includes administrative costs of \$900.00.
2. Until the MMRP has been recorded and the administrative portion of the MMRP fee has been paid, no final parcel map or final subdivision map for the subject property shall be approved. Until the balance of the MMRP fee has been paid, no encroachment, grading, building, sewer connection, water connection or occupancy permit from Sacramento County shall be approved.

INITIAL STUDY CHECKLIST

Appendix G of the California Environmental Quality Act (CEQA) provides guidance for assessing the significance of potential environmental impacts. Based on this guidance, Sacramento County has developed the following Initial Study Checklist. The Checklist identifies a range of potential significant effects by topical area. The words "significant" and "significance" used throughout the following checklist are related to impacts as defined by the California Environmental Quality Act as follows:

- 1 Potentially Significant indicates there is substantial evidence that an effect MAY be significant. If there are one or more "Potentially Significant" entries an Environmental Impact Report (EIR) is required. Further research of a potentially significant impact may reveal that the impact is actually less than significant or less than significant with mitigation.
- 2 Less than Significant with Mitigation applies where an impact could be significant but specific mitigation has been identified that reduces the impact to a less than significant level.
- 3 Less than Significant or No Impact indicates that either a project will have an impact but the impact is considered minor or that a project does not impact the particular resource.

| | Potentially Significant | Less Than Significant with Mitigation | Less Than Significant | No Impact | Comments |
|--|-------------------------|---------------------------------------|-----------------------|-----------|---|
| 1. LAND USE - Would the project: | | | | | |
| a. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to a general plan, specific plan or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | | | X | | The project is consistent with environmental policies of the Sacramento County General Plan, North Highlands Community Plan, and Sacramento County Zoning Code. |
| b. Physically disrupt or divide an established community? | | | X | | The project will not create physical barriers that substantially limit movement within or through the community. |
| 2. POPULATION/HOUSING - Would the project: | | | | | |
| a. Induce substantial unplanned population growth in an area either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of infrastructure)? | | | X | | The project will neither directly nor indirectly induce substantial unplanned population growth; the proposal is consistent with existing land use designations. |
| b. Displace substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere? | | | | X | The project will not result in the removal of existing housing, and thus will not displace substantial amounts of existing housing. |
| 3. AGRICULTURAL RESOURCES - Would the project: | | | | | |
| a. Convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance or areas containing prime soils to uses not conducive to agricultural production? | | | | X | The project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on the current Sacramento County Important Farmland Map published by the California Department of Conservation. The site does not contain prime soils. |
| b. Conflict with any existing Williamson Act contract? | | | | X | No Williamson Act contracts apply to the project site. |

| | Potentially Significant | Less Than Significant with Mitigation | Less Than Significant | No Impact | Comments |
|---|-------------------------|---------------------------------------|-----------------------|-----------|---|
| c. Introduce incompatible uses in the vicinity of existing agricultural uses? | | | | X | The project does not occur in an area of agricultural production. |
| 4. AESTHETICS - Would the project: | | | | | |
| a. Substantially alter existing viewsheds such as scenic highways, corridors or vistas? | | | | X | The project does not occur in the vicinity of any scenic highways, corridors, or vistas. |
| b. Substantially degrade the existing visual character or quality of the site and its surroundings? | | | X | | It is acknowledged that aesthetic impacts are subjective and may be perceived differently by various affected individuals. Nonetheless, given the urbanized environment in which the project is proposed, it is concluded that the project would not substantially degrade the visual character or quality of the project site or vicinity. |
| c. Create a new source of substantial light, glare, or shadow that would result in safety hazards or adversely affect day or nighttime views in the area? | | | X | | The project will not result in a new source of substantial light, glare or shadow that would result in safety hazards or adversely affect day or nighttime views in the area. |
| 5. AIRPORTS - Would the project: | | | | | |
| a. Result in a safety hazard for people residing or working in the vicinity of an airport/airstrip? | | | X | | The project is located within the safety zone of McClellan Field. Refer to the Airports discussion in the Environmental Effects section above. |
| b. Expose people residing or working in the project area to aircraft noise levels in excess of applicable standards? | | | X | | The project is located in the vicinity of McClellan Field. Refer to the Airports discussion in the Environmental Effects section above. |
| c. Result in a substantial adverse effect upon the safe and efficient use of navigable airspace by aircraft? | | | X | | The project is located in the vicinity of McClellan Field. Refer to the Airports discussion in the Environmental Effects section above. |

| | Potentially Significant | Less Than Significant with Mitigation | Less Than Significant | No Impact | Comments |
|---|-------------------------|---------------------------------------|-----------------------|-----------|--|
| d. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? | | | | X | The project does not involve or affect air traffic movement. |
| 6. PUBLIC SERVICES - Would the project | | | | | |
| a. Have an adequate water supply for full buildout of the project? | | | X | | The water service provider has adequate capacity to serve the water needs of the proposed project. |
| b. Have adequate wastewater treatment and disposal facilities for full buildout of the project? | | | X | | The Sacramento Regional County Sanitation District has adequate wastewater treatment and disposal capacity to service the proposed project. |
| c. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? | | | X | | The Kiefer Landfill has capacity to accommodate solid waste until the year 2050. |
| d. Result in substantial adverse physical impacts associated with the construction of new water supply or wastewater treatment and disposal facilities or expansion of existing facilities? | | | X | | The project will not require construction or expansion of new water supply, wastewater treatment, or wastewater disposal facilities. |
| e. Result in substantial adverse physical impacts associated with the provision of storm water drainage facilities? | | | X | | Minor extension of infrastructure would be necessary to serve the proposed project. Existing stormwater drainage facilities are located within existing roadways and other developed areas, and the extension of facilities would take place within areas already proposed for development as part of the project. No significant new impacts would result from stormwater facility extension. |
| f. Result in substantial adverse physical impacts associated with the provision of electric or natural gas service? | | | X | | Minor extension of utility lines would be necessary to serve the proposed project. Existing utility lines are located along existing roadways and other developed areas, and the extension of lines would take place within areas already proposed for development as part of the project. No significant new impacts would result from utility extension. |

| | Potentially Significant | Less Than Significant with Mitigation | Less Than Significant | No Impact | Comments |
|---|-------------------------|---------------------------------------|-----------------------|-----------|---|
| g. Result in substantial adverse physical impacts associated with the provision of emergency services? | | | X | | The project would incrementally increase demand for emergency services, but would not cause substantial adverse physical impacts as a result of providing adequate service. |
| h. Result in substantial adverse physical impacts associated with the provision of public school services? | | | | X | The project will not require the use of public school services. |
| i. Result in substantial adverse physical impacts associated with the provision of park and recreation services? | | | | X | The project will not result in increased demand for park and recreation services. |
| 7. TRANSPORTATION/TRAFFIC - Would the project: | | | | | |
| a. Result in a substantial increase in vehicle trips that would exceed, either individually or cumulatively, a level of service standard established by the County? | | X | | | A Traffic Impact Study was prepared for the proposed project, which concluded that the project will result in significant impacts to Level of Service at Elkhorn Blvd and 28 th St. Mitigation is included to reduce these impacts to less than significant levels. |
| b. Result in a substantial adverse impact to access and/or circulation? | | X | | | The project will be required to comply with applicable access and circulation requirements of the County Improvement Standards and the Uniform Fire Code. Upon compliance, impacts are less than significant. The project will result in traffic that could adversely affect access to the site, see the Transportation/Traffic section above. |
| c. Result in a substantial adverse impact to public safety on area roadways? | | | X | | The project will be required to comply with applicable access and circulation requirements of the County Improvement Standards and the Uniform Fire Code. Upon compliance, impacts are less than significant. |

| | Potentially Significant | Less Than Significant with Mitigation | Less Than Significant | No Impact | Comments |
|--|-------------------------|---------------------------------------|-----------------------|-----------|--|
| d. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)? | | | X | | The project does not conflict with alternative transportation policies of the Sacramento County General Plan, with the Sacramento Regional Transit Master Plan, or other adopted policies, plans or programs supporting alternative transportation. |
| 8. AIR QUALITY - Would the project: | | | | | |
| a. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard? | | | X | | The project does not exceed the screening thresholds established by the Sacramento Metropolitan Air Quality Management District and will not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment. |
| b. Expose sensitive receptors to pollutant concentrations in excess of standards? | | | X | | See Response 8.a. |
| c. Create objectionable odors affecting a substantial number of people? | | | X | | The project will not generate objectionable odors. |
| 9. NOISE - Would the project: | | | | | |
| a. Result in exposure of persons to, or generation of, noise levels in excess of standards established by the local general plan, noise ordinance or applicable standards of other agencies? | | | X | | The project is not in the vicinity of any uses that generate substantial noise, nor will the completed project generate substantial noise. The project will not result in exposure of persons to, or generation of, noise levels in excess of applicable standards. |
| b. Result in a substantial temporary increase in ambient noise levels in the project vicinity? | | | X | | Project construction will result in a temporary increase in ambient noise levels in the project vicinity. This impact is less than significant due to the temporary nature of the these activities, limits on the duration of noise, and evening and nighttime restrictions imposed by the County Noise Ordinance (Chapter 6.68 of the County Code). |

| | Potentially Significant | Less Than Significant with Mitigation | Less Than Significant | No Impact | Comments |
|--|-------------------------|---------------------------------------|-----------------------|-----------|---|
| 10. HYDROLOGY AND WATER QUALITY - Would the project: | | | | | |
| a. Substantially deplete groundwater supplies or substantially interfere with groundwater recharge? | | | X | | The project will incrementally add to groundwater consumption; however, the singular and cumulative impacts of the proposed project upon the groundwater decline in the project area are minor. |
| b. Substantially alter the existing drainage pattern of the project area and/or increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site? | | | X | | Compliance with applicable requirements of the Sacramento County Floodplain Management Ordinance, Sacramento County Water Agency Code, and Sacramento County Improvement Standards will ensure that impacts are less than significant. |
| c. Develop within a 100-year floodplain as mapped on a federal Flood Insurance Rate Map or within a local flood hazard area? | | | X | | The project site is in a local flood hazard area, but not in a federally mapped floodplain. Compliance with the County Floodplain Management Ordinance, County Drainage Ordinance, and Improvement Standards will assure less than significant impacts. Refer to the Hydrology discussion in the Environmental Effects section above. |
| d. Place structures that would impede or redirect flood flows within a 100-year floodplain? | | | | X | The project site is not within a 100-year floodplain. |
| e. Develop in an area that is subject to 200 year urban levels of flood protection (ULOP)? | | | | X | The project is not located in an area subject to 200-year urban levels of flood protection (ULOP). |
| f. Expose people or structures to a substantial risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam? | | | | X | The project will not expose people or structures to a substantial risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam. |
| g. Create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems? | | | X | | Adequate on- and/or off-site drainage improvements will be required pursuant to the Sacramento County Floodplain Management Ordinance and Improvement Standards. |

| | Potentially Significant | Less Than Significant with Mitigation | Less Than Significant | No Impact | Comments |
|--|-------------------------|---------------------------------------|-----------------------|-----------|---|
| h. Create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality? | | | X | | <p>Compliance with the Stormwater Ordinance and Land Grading and Erosion Control Ordinance (Chapters 15.12 and 14.44 of the County Code respectively) will ensure that the project will not create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality.</p> <p>All underground storage tanks are subject to federal and State regulations pertaining to operating standards, leak reporting requirements, and corrective action requirements. The County Environmental Management Department enforces these regulations. Existing regulations will ensure that impacts are less than significant.</p> |
| 11. GEOLOGY AND SOILS - Would the project: | | | | | |
| a. Expose people or structures to substantial risk of loss, injury or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? | | | X | | <p>Sacramento County is not within an Alquist-Priolo Earthquake Fault Zone. Although there are no known active earthquake faults in the project area, the site could be subject to some ground shaking from regional faults. The Uniform Building Code contains applicable construction regulations for earthquake safety that will ensure less than significant impacts.</p> |
| b. Result in substantial soil erosion, siltation or loss of topsoil? | | | X | | <p>Compliance with the County's Land Grading and Erosion Control Ordinance will reduce the amount of construction site erosion and minimize water quality degradation by providing stabilization and protection of disturbed areas, and by controlling the runoff of sediment and other pollutants during the course of construction.</p> |
| c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, soil expansion, liquefaction or collapse? | | | X | | <p>The project is not located on an unstable geologic or soil unit.</p> |

| | Potentially Significant | Less Than Significant with Mitigation | Less Than Significant | No Impact | Comments |
|---|-------------------------|---------------------------------------|-----------------------|-----------|---|
| d. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available? | | | X | | A public sewer system is available to serve the project. |
| e. Result in a substantial loss of an important mineral resource? | | | | X | The project is not located within an Aggregate Resource Area as identified by the Sacramento County General Plan Land Use Diagram, nor are any important mineral resources known to be located on the project site. |
| f. Directly or indirectly destroy a unique paleontological resource or site? | | | X | | No known paleontological resources (e.g. fossil remains) or sites occur at the project location. |
| 12. BIOLOGICAL RESOURCES - Would the project: | | | | | |
| a. Have a substantial adverse effect on any special status species, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, or threaten to eliminate a plant or animal community? | | X | | | No special status species are known to exist on or utilize the project site, nor would the project substantially reduce wildlife habitat or species populations. |
| b. Have a substantial adverse effect on riparian habitat or other sensitive natural communities? | | | X | | No sensitive natural communities occur on the project site, nor is the project expected to affect natural communities off-site. |
| c. Have a substantial adverse effect on streams, wetlands, or other surface waters that are protected by federal, state, or local regulations and policies? | | | X | | No protected surface waters are located on or adjacent to the project site. |
| d. Have a substantial adverse effect on the movement of any native resident or migratory fish or wildlife species? | | | X | | Resident and/or migratory wildlife may be displaced by project construction; however, impacts are not anticipated to result in significant, long-term effects upon the movement of resident or migratory fish or wildlife species, and no major wildlife corridors would be affected. |

| | Potentially Significant | Less Than Significant with Mitigation | Less Than Significant | No Impact | Comments |
|---|-------------------------|---------------------------------------|-----------------------|-----------|--|
| e. Adversely affect or result in the removal of native or landmark trees? | | | X | | No native and/or landmark trees occur on the project site, nor is it anticipated that any native and/or landmark trees would be affected by off-site improvement required as a result of the project. |
| f. Conflict with any local policies or ordinances protecting biological resources? | | | X | | The project is consistent with local policies/ordinances protecting biological resources. |
| g. Conflict with the provisions of an adopted Habitat Conservation Plan or other approved local, regional, state or federal plan for the conservation of habitat? | | | X | | There are no known conflicts with any approved plan for the conservation of habitat. |
| 13. CULTURAL RESOURCES - Would the project: | | | | | |
| a. Cause a substantial adverse change in the significance of a historical resource? | | | X | | No historical resources would be affected by the proposed project. |
| b. Have a substantial adverse effect on an archaeological resource? | | | X | | An archaeological survey was conducted on the project site. Refer to the Initial Study. |
| c. Disturb any human remains, including those interred outside of formal cemeteries? | | | X | | No known human remains exist on the project site. Nonetheless, mitigation has been recommended to ensure appropriate treatment should remains be uncovered during project implementation. |
| d. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074? | | | X | | Notification pursuant to Public Resources Code 21080.3.1(b) was provided to the tribes and request for consultation was received. Refer to the Cultural Resources discussion in the Environmental Effects section above. |
| 14. HAZARDS AND HAZARDOUS MATERIALS - Would the project: | | | | | |
| a. Create a substantial hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | | | X | | The project involves the storage of hazardous materials on the site (i.e., underground storage tanks). However, compliance with local, state and federal standards regarding the construction and maintenance of these tanks will provide adequate protection from upset conditions. |

| | Potentially Significant | Less Than Significant with Mitigation | Less Than Significant | No Impact | Comments |
|---|-------------------------|---------------------------------------|-----------------------|-----------|--|
| b. Expose the public or the environment to a substantial hazard through reasonably foreseeable upset conditions involving the release of hazardous materials? | | | X | | The project involves the storage of hazardous materials on the site (i.e., underground storage tanks). However, compliance with local, state and federal standards regarding the construction and maintenance of these tanks will provide adequate protection from upset conditions. |
| c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school? | | | | X | The project site is not located within ¼ mile of an existing /proposed school. |
| d. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, resulting in a substantial hazard to the public or the environment? | | | | X | The project is not located on a known hazardous materials site. |
| e. Impair implementation of or physically interfere with an adopted emergency response or emergency evacuation plan? | | | X | | The project would not interfere with any known emergency response or evacuation plan. |
| f. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to or intermixed with urbanized areas? | | | X | | The project is within the urbanized area of the unincorporated County. There is no significant risk of loss, injury, or death to people or structures associated with wildland fires. |
| 15. GREENHOUSE GAS EMISSIONS – Would the project: | | | | | |
| a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | | | X | | The California Emissions Estimator Model (CalEEMod) was used to estimate the greenhouse gas emissions associated with the project. See the Environmental Effects section above. |

SUPPLEMENTAL INFORMATION

| LAND USE CONSISTENCY | Current Land Use Designation | Consistent | Not Consistent | Comments |
|----------------------|------------------------------|------------|----------------|----------|
| General Plan | Intensive Industrial | X | | |
| Community Plan | M-1 Light Industrial | X | | |
| Land Use Zone | M-1 Light Industrial | X | | |

INITIAL STUDY PREPARERS

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Project Leader: Jessie Shen
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