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## 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 Negative Declaration re: The Project described as follows:

**1. Control Number: PLNP2018-00313**

**2. Title and Short Description of Project:** 9396 Greenback Lane 7-Eleven

A Use Permit to allow a 24-hour automobile service station and a 24-hour convenience store on 1.1 acres in the Greenback Lane Special Planning Area (SPA).

A Special Development Permit for the canopy height to exceed 18.5 feet and for signage to exceed 125 square feet. The Special Development Permit would also allow for a deviation from landscaping requirements, which would allow for 69 linear feet of frontage not having a 3-foot landscape planter.

A Design Review to comply with the Countywide Design Guidelines.

If approved, the project would result in the demolition of the existing 12,870 square foot building, the construction of a 3,134 square foot convenience store, a 4,947 square foot fuel canopy, the installation of six fuel pump stations, the placement of two underground fuel storage tanks, a trash enclosure, monument signs, and landscaping. The approximately 11,530 square foot of proposed landscaping includes 27 new trees, shrubs and ground covers, accent plants, and a decomposed granite patio.

**3. Assessor's Parcel Number:** 223-0182-051

**4. Location of Project:** The project site is located 9396 Greenback Lane, Orangevale, CA 95662.

**5. Project Applicant:** TAIT & Associates

**6. Said project will not have a significant effect on the environment for the following reasons:**

- 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.
- It will not have the potential to achieve short-term, to the disadvantage of long-term, environmental goals.
- It will not have impacts, which are individually limited, but cumulatively considerable.
- 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 Office of County Planning and Environmental Review in support of this Negative Declaration. Further information may be obtained by contacting the Office 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**

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**CONTROL NUMBER:** PLNP2018-00313

**NAME:** 9396 Greenback Lane 7-Eleven

**LOCATION:** The project site is located 9396 Greenback Lane, Orangevale, CA 95662.

**ASSESSOR'S PARCEL NUMBER:** 223-0182-051

**OWNER:** Sterling G. Fligge II, Diana L. Fligge, & Kevin E. Fligge

**APPLICANT:** TAIT & Associates

**PROJECT DESCRIPTION**

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1. A Use Permit to allow a 24-hour automobile service station and a 24-hour convenience store on 1.1 acres in the Greenback Lane Special Planning Area (SPA).
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Plate IS-1: Vicinity Map

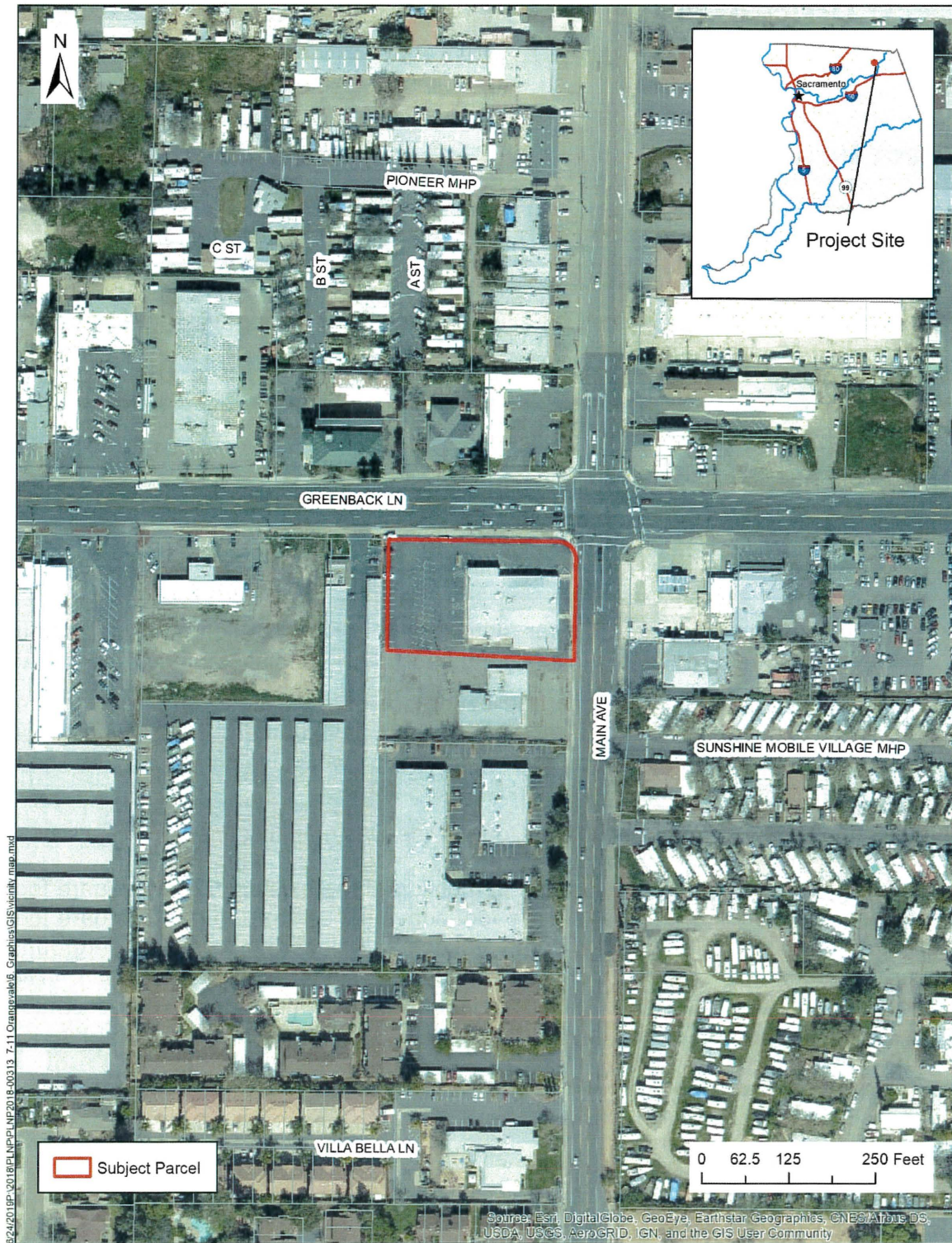
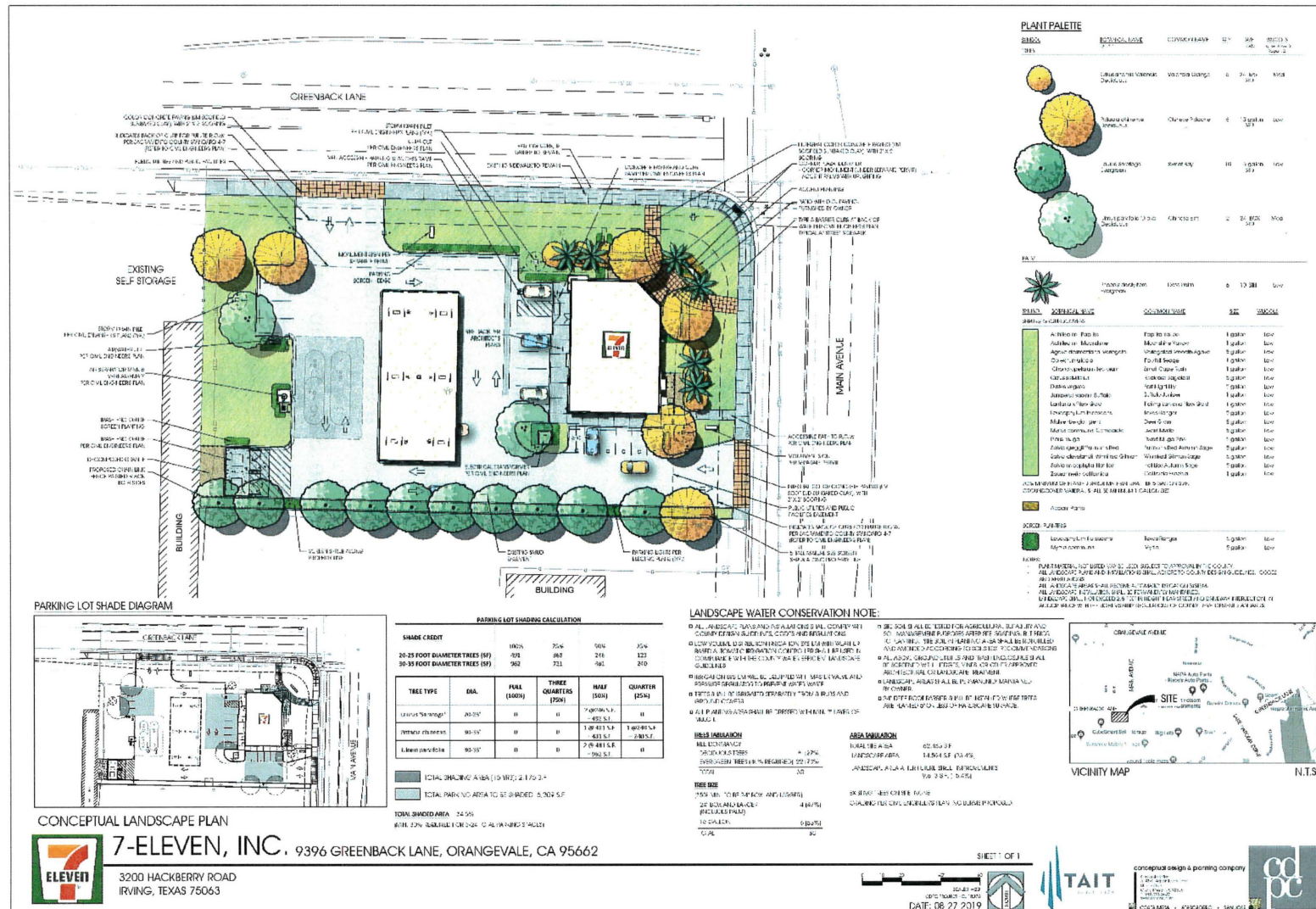




Plate IS-2: Proposed Site Plan



## ENVIRONMENTAL SETTING

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The project site is located on the southwest corner of Greenback Lane at Main Avenue. The parcel is located along an urban corridor in the Orangevale community. The site is developed with a vacant 12,870 square foot commercial building, which was built in 1953. The rest of the site is developed with an asphalt-paved parking lot providing 66 parking spaces. The site does not have any landscaping.

The project site is currently an underutilized paved parking lot with a few mature sized parking lot shade trees. Being located at the junction of Greenback Lane and Main Avenue, the site is bordered by roadways on the north and east; with commercial uses located across the roadways. A self-storage facility borders the western portion of the project site and a fenced, commercial property borders the southern boundary.

## ENVIRONMENTAL EFFECTS

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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.

### 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.
- Expose sensitive receptors to pollutant concentrations in excess of standards.
- Create objectionable odors affecting a substantial number of people.

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-1). Moreover, SMAQMD has established significance thresholds to determine if a proposed project's emission contribution significantly contributes to regional air quality impacts (Table IS-2).

Table IS-1: Air Quality Standards Attainment Status

Pollutant	Attainment with State Standards	Attainment with Federal Standards
Ozone	Non-Attainment Classification = Serious (1 hour Standard <sup>1</sup> )	Non-Attainment, Classification = Severe -15* (1 hour <sup>2</sup> and 8 hour <sup>3</sup> Standards)
Particulate Matter 10 Micron	Non-Attainment (24 hour Standard and Annual Mean)	Attainment (24 hour standard)
Particulate Matter 2.5 Micron	Non-Attainment (Annual Standard)	Non-Attainment (24 hour Standard) and Unclassified/Attainment (Annual)
Carbon Monoxide	Attainment (1 hour and 8 hour Standards)	Attainment (1 hour and 8 hour Standards)
Nitrogen Dioxide	Attainment (1 hour Standard and Annual)	Unclassified/Attainment (1 hour and Annual)
Sulfur Dioxide <sup>4</sup>	Attainment (1 hour and 24 hour Standards)	Attainment (1 hour)
Lead	Attainment (30 Day Standard)	Attainment (3-month rolling average)
Visibility Reducing Particles	Unclassified (8 hour Standard)	No Federal Standard
Sulfates	Attainment (24 hour Standard)	No Federal Standard
Hydrogen Sulfide	Unclassified (1 hour Standard)	No Federal Standard
<p>1. Per Health and Safety Code (HSC) § 40921.59(c), the classification is based on 1989-1001 data, and therefore does not change.</p> <p>2. Air Quality meets Federal 1-hour Ozone standard (77 FR 64036). EPA revoked this standard, but some associated requirements still apply. The SMAQMD attained the standard in 2009. SMAQMD has requested EPA recognize attainment to fulfill the requirements.</p> <p>3. For both that 1997 and the 2008 Standard.</p> <p>4. Cannot be classified</p> <p>*Federal designations based on information from <a href="http://www.gpo.gov/fdsys/pkg/CFR-2010-title40-vol17/pdf/CFR-2010-title40-vol17-sec81-305.pdf">http://www.gpo.gov/fdsys/pkg/CFR-2010-title40-vol17/pdf/CFR-2010-title40-vol17-sec81-305.pdf</a></p> <p>*California Area Designations based on information from <a href="http://www.arb.ca.gov/desig/changes.htm#reports">http://www.arb.ca.gov/desig/changes.htm#reports</a></p> <p>Source: SMAQMD. "Air Quality Standards Attainment Status". <i>Air Quality Data</i>. December 23, 2013. Web. Accessed: July 6, 2015. <a href="http://www.airquality.org/aqdata/attainmentstat.shtml">http://www.airquality.org/aqdata/attainmentstat.shtml</a></p>		



Table IS-2: SMAQMD Significance Thresholds

	ROG <sup>1</sup> (lbs/day)	NO <sub>x</sub> (lbs/day)	CO (µg/m <sup>3</sup> )	PM <sub>10</sub> (lbs/day)	PM <sub>2.5</sub> (lbs/day)
Construction (short-term)	None	85	CAAQS <sup>2</sup>	80 <sup>3*</sup>	82 <sup>3*</sup>
Operational (long-term)	65	65	CAAQS	80 <sup>3*</sup>	82 <sup>3*</sup>
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 threshold of 0 lbs/day.					

In order to use the non-zero thresholds of significance for operational PM emissions, SMAQMD requires projects to employ the following Best Management Practices (BMPs). It should be noted that the implementation of Best Available Control Technologies (BACT) are only required for stationary source operational emissions. BACT can be determined through consultation with SMAQMD permitting staff.

The following list from Chapter 4 of the SMAQMD "Guide to Air Quality Assessment in Sacramento County" (December 2009, as amended, hereinafter called the SMAQMD Guide) identifies the BMPs for operational PM emissions for land use development projects:

1. Compliance with District rules that control operational PM and NO<sub>x</sub> emissions. Reference rules regarding wood burning devices, boilers, water heaters, generators and other PM control rules that may apply to equipment to be located at the project. Current rules can be found on the District's website: <http://www.airquality.org/Businesses/Rules-Regulations>
2. Compliance with mandatory measures in the California Building Energy Efficiency Standards (Title 24, Part 6) that pertain to efficient use of natural gas for space and water heating and other uses at a residential or non-residential land use. The current standards can be found on the California Energy Commissions website: <http://www.energy.ca.gov/title24/>
3. Compliance with mandatory measures in the California Green Building Code (Title 24, Part 11). The California Building Standards Commission provides helpful checklists showing the required and voluntary measures for residential and non-residential projects on its website: <http://www.bsc.ca.gov/Home/CALGreen.aspx>.

Current mandatory measures related to operational PM include requirements for bicycle parking, parking for fuel efficient vehicles, electric vehicle charging, and fireplaces for non-residential projects. Residential project measures include requirements for electric vehicle charging and fireplaces.

4. Compliance with anti-idling regulations for diesel powered commercial motor vehicles (greater than 10,000 gross vehicular weight rating). This BMP focuses on

non-residential land use projects (retail and industrial) that would attract these vehicles. The current requirements include limiting idling time to 5 minutes and installing technologies on the vehicles that support anti-idling. Information can be found on the California Air Resources Board's website: <http://www.arb.ca.gov/msprog/truckidling/truck-idling.htm>.

Additionally, the California Air Resources Board adopted a regulation that applies to transport refrigeration units (TRUs) that are found on many delivery trucks carrying food. Information on the TRU regulation can be found on the California Air Resources Board's website: <http://www.arb.ca.gov/diesel/tru/tru.htm>.

Since retail and industrial land use projects may not have control over the anti-idling technologies installed on commercial vehicles coming to the project, the BMP is to provide notice of the anti-idling regulations at the delivery/loading dock and to neighbors. The notice to the neighbors should also include whom at the retail or industrial project can be contacted to file a complaint regarding idling and the California Air Resources Vehicle Complaint Hotline 1-800-363-7664.

### **CONSTRUCTION EMISSIONS/SHORT-TERM IMPACTS**

Short-term air quality impacts are mostly due to dust (PM<sub>10</sub> and PM<sub>2.5</sub>) generated by construction and development activities, and emissions from equipment and vehicle engines (NO<sub>x</sub>) 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. PM<sub>10</sub> and PM<sub>2.5</sub> are considered unhealthy because the particles are small enough to inhale and damage lung tissue, which can lead to respiratory problems.

#### **PARTICULATE MATTER EMISSIONS**

The SMAQMD Guide includes screening criteria for construction-related particulate matter. Projects that are 35 acres or less in size will generally not exceed the SMAQMD's construction PM<sub>10</sub> or PM<sub>2.5</sub> thresholds of significance provided that the project does not:

- Include buildings more than 4 stories tall;
- Include demolition activities;
- Include significant trenching activities;
- Have a construction schedule that is unusually compact, fast-paced, or involves more than 2 phases (i.e., grading, paving, building construction, and architectural coatings) occurring simultaneously;



- Involve cut-and-fill operations (moving earth with haul trucks and/or flattening or terracing hills); or,
- Require import or export of soil materials that will require a considerable amount of haul truck activity

Some PM<sub>10</sub> and PM<sub>2.5</sub> emissions during project construction can be reduced through compliance with institutional requirements for dust abatement and erosion control. These institutional measures include the SMAQMD "District Rule 403-Fugitive Dust" and measures in the Sacramento County Code relating to land grading and erosion control [Title 16, Chapter 16.44, Section 16.44.090(K)].

The project site is less than 35 acres and does not involve buildings more than 4 stories tall; demolition activities; significant trenching activities; an unusually compact construction schedule; cut-and-fill operations; or, import or export of soil materials requiring a considerable amount of haul truck activity. Therefore, the project meets the SMAQMD Guide screening criteria for PM<sub>10</sub> and PM<sub>2.5</sub>. The SMAQMD Guide includes a list of Basic Construction Emissions Control Practices that should be implemented on all projects, regardless of size. Dust abatement practices are required pursuant to SMAQMD Rule 403 and California Code of Regulations, Title 13, sections 2449(d)(3) and 2485; the SMAQMD Guide simply lays out the basic practices needed to comply. Since these are already required by existing rules and regulations, it is not necessary to include them as mitigation.

#### OZONE PRECURSOR EMISSIONS (NO<sub>x</sub>)

The SMAQMD Guide currently provides screening criteria for construction-related ozone precursor emissions (NO<sub>x</sub>) similar to those which will be implemented for particulate matter. Projects that are 35 acres or less in size will generally not exceed the SMAQMD's construction NO<sub>x</sub> thresholds of significance provided that the project does not:

- Include buildings more than 4 stories tall;
- Include demolition activities;
- Include significant trenching activities;
- Have a construction schedule that is unusually compact, fast-paced, or involves more than 2 phases (i.e., grading, paving, building construction, and architectural coatings) occurring simultaneously;
- Involve cut-and-fill operations (moving earth with haul trucks and/or flattening or terracing hills);
- Require import or export of soil materials that will require a considerable amount of haul truck activity; or,

- Require soil disturbance (i.e., grading) that exceeds 15 acres per day. Note that 15 acres is a screening level and shall not be used as a mitigation measure.

The project site is less than 35 acres and does not involve buildings more than 4 stories tall; demolition activities; significant trenching activities; an unusually compact construction schedule; cut-and-fill operations; import or export of soil materials requiring a considerable amount of haul truck activity; or, soil disturbance that exceeds 15 acres per day. Therefore, the project does not exceed the SMAQMD's construction NOx significance thresholds.

Based on the SMAQMD screening criteria, project construction does not have the potential to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment; therefore, impacts are **less than significant**.

#### **OPERATIONAL EMISSIONS/LONG-TERM IMPACTS**

Once a project is completed, additional pollutants are emitted through the use, or operation, of the site. Land use development projects typically involve the following sources of emissions: motor vehicle trips generated by the land use; fuel combustion from landscape maintenance equipment; natural gas combustion emissions used for space and water heating; evaporative emissions of ROG associated with the use of consumer products; and, evaporative emissions of ROG resulting from the application of architectural coatings.

Ultimately, a project typically must have large acreages or intense uses in order to result in significant operational air quality impacts. For ozone precursor emissions the screening table in the SMAQMD Guide allows users to screen out projects.

Table IS-3: CalEEMod Results-Construction Phase and Operational

Construction Year	Constituent in pounds per day			
	ROG	NOx	PM <sub>10</sub>	PM <sub>2.5</sub>
Construction (short-term)	7.20	9.33	1.87	0.89
Operational (long-term)	4.07	12.98	2.80	0.79

As shown Table IS-3, the project will not exceed the PM<sub>10</sub>, or PM<sub>2.5</sub> significance thresholds during the construction period or operation period. Since the proposed project is significantly below the construction and operational thresholds adopted by SMAQMD listed in Table IS-2, impacts to Air Quality are anticipated to be **less than significant**.

#### **TOXIC EMISSIONS**

The proposed Project would be a source of gasoline vapors that would include toxic air contaminants (TACs) such as benzene, methyl tertiary-butyl ether, toluene, and xylene. Benzene is the primary TAC associated with gas stations. Gasoline vapors are released



during the filling of the stationary underground storage tanks (USTs) and during the transfer from those underground tanks to individual vehicles.

The SMAQMD regulates these emissions through a permitting process, (Health Risk Assessment), which applies to all service stations within Sacramento County. Permits may be granted to these operations provided they are operated in accordance with applicable SMAQMD rules and regulations. SMAQMD's gasoline station permitting process provides for the review of gasoline TAC emissions in order to evaluate potential public exposure and health risk, to mitigate potentially significant health risks resulting from these exposures, and to provide net health risk benefits by improving the level of control when existing sources are modified or replaced. SMAQMD's permitting procedures require substantial control of emissions, and permits are not issued unless TAC risk screening or TAC risk assessment can show that risks are not significant. SMAQMD may impose limits on annual throughput to ensure that risks are within acceptable limits. In addition, The California Air Resources Board (CARB) must certify all vapor recovery equipment that is used at service stations which would satisfy the Toxics Best Available Control Technology (TBACT) requirement.

SMAQMD staff has indicated on previous gas station projects that only a very high throughput service station in close proximity to a school or other sensitive receptor would be likely to exceed thresholds. At present, SMAQMD staff runs individual assessments on all new service stations or projects where a school is located within 1,000 feet of the project site and there is an increase in emissions. There are no schools located within 1,000 feet of the project site.

As indicated in Table IS-3, project operational emissions of criteria pollutants would be below SMAQMD significance thresholds with BACT and BMPs. Exposure by individuals pumping gasoline would be limited in time, so the dose level for customers would be low. In addition, SMAQMD Rules 448 and 449 require the installation of vapor recovery systems that would reduce the amount of vapors that would be emitted into the atmosphere by 95-98% from levels without such systems. This would further limit doses and exposures, reducing potential health risk related to gasoline vapors to a level that is not significant. The Project applicant shall be required to obtain a permit from SMAQMD and implement all SMAQMD required measures. With compliance with existing regulations, impacts associated with air toxics will remain ***less than significant***.

### ***ODORS***

CEQA and the SMAQMD Guide consider objectionable odors as a potentially significant environmental impact. SMAQMD Rule 402 prohibits the discharge of air contaminants that could be a nuisance or an annoyance. This prohibition includes potential odors.

Odors that may be generated at the project site include gasoline vapors; these odors are typically only detectable on the project site and would readily dissipate. In accordance with SMAQMD Rules 448 and 449, vapor recovery systems would be required. Project impacts related to odors are considered ***less than significant***.

## **HYDROLOGY AND WATER QUALITY**

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

- 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?

The project site is not located in any federal floodplain.

### ***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](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***.



## **CULTURAL RESOURCES**

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

- Have a substantial adverse effect on an archaeological resource.
- Disturb any human remains, including those interred outside of formal cemeteries.
- Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074.

The California Environmental Quality Act (CEQA) defines cultural resources as historical and unique archaeological resources that meet significance criteria of the California Register of Historical Resources. The eligibility criteria of the California Register include the following:

- Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- Is associated with the lives of persons important in our past;
- Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- Has yielded, or may be likely to yield, information important in prehistory or history. (Public Resources Code SS5024.1, Title 14 CCR, Section 4852).

Under CEQA, lead agencies must consider the effects of their projects on cultural resources.

## **AB-52 CONSULTATION**

Pursuant to Public Resources Code 21090.3.1(b)(1), tribal notifications were sent out to participating tribes on September 19, 2019. Correspondence sent to the tribes included a project description, non-confidential letter with from the California Historical Resources Information System's Northern Central Information Center indicating that the project area is not sensitive with respect to cultural resources, and supporting map graphics. Written correspondence was received from the United Auburn Indian Community (UAIC) on July 25, 2019. The correspondence identified the project as potentially sensitive and requested consultation under AB-52. UAIC requested inadvertent discovery mitigation language be incorporated. In the event that tribal cultural resources are discovered, UAIC's policy is that tribal monitors be present for all further ground-disturbing activities.

**CONCLUSION**

With the recommended mitigation, potential impacts to cultural resources will be *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?

The proposed project will include two underground fuel storage tanks, both will have a 20,000 gallon capacity. 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-4 describes the primary GHGs attributed to global climate change, including their physical properties, primary sources, and contributions to the greenhouse effect.

**Table IS-4: Greenhouse Gases**

Greenhouse Gas	Description
Carbon Dioxide (CO <sub>2</sub> )	Carbon dioxide is a colorless, odorless gas. CO <sub>2</sub> is emitted in a number of ways, both naturally and through human activities. The largest source of CO <sub>2</sub> 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 <sub>2</sub> emissions. The atmospheric lifetime of CO <sub>2</sub> is variable because it is so readily exchanged in the atmosphere. <sup>1</sup>
Methane (CH <sub>4</sub> )	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 <sub>4</sub> to the atmosphere. Natural sources of CH <sub>4</sub> include wetlands, gas hydrates, permafrost, termites, oceans, freshwater bodies, non-wetland soils, and other sources such as wildfires. The atmospheric lifetime of CH <sub>4</sub> is about 12 years. <sup>2</sup>
Nitrous Oxide (N <sub>2</sub> 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 <sub>2</sub> 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 <sub>2</sub> 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 <sub>2</sub> O is approximately 120 years. <sup>3</sup>

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. CH<sub>4</sub> traps over 25 times more heat per molecule than CO<sub>2</sub>, and N<sub>2</sub>O absorbs 298 times more heat per molecule than CO<sub>2</sub>. Often, estimates of GHG emissions are presented in carbon dioxide equivalents (CO<sub>2</sub>e), which weight each gas by its global warming potential (GWP). Expressing GHG emissions in CO<sub>2</sub>e 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 CO<sub>2</sub> 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 CO<sub>2</sub> is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, or other forms.

Of the total annual human-caused CO<sub>2</sub> 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 CO<sub>2</sub> 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 August 2019, CARB released the 2019 edition of the California GHG inventory covering calendar year 2017 emissions. In 2017, California emitted 424.1 million gross metric tons of CO<sub>2</sub>e including from imported electricity. Combustion of fossil fuel in the transportation sector was the single largest source of California's GHG emissions in 2017, accounting for approximately 41 percent of total GHG emissions in the state. This sector was followed by the industrial sector (24 percent) and the electric power sector (including both in-state and out-of-state sources) (15 percent).

Emissions of CO<sub>2</sub> are by-products of fossil fuel combustion. CH<sub>4</sub>, 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. N<sub>2</sub>O is also largely attributable to agricultural practices and soil management. Carbon dioxide sinks, or reservoirs, include vegetation and the ocean, which absorb CO<sub>2</sub> through sequestration and dissolution (CO<sub>2</sub> 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 CO<sub>2</sub>e emissions, or approximately 21.7 percent from the State's projected 2020 emission level of 545 million metric tons of CO<sub>2</sub>e under a business-as-usual scenario (this is a reduction of 47 million metric tons of CO<sub>2</sub>e, 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.



**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-5: Sacramento Metropolitan Air Quality Management District Threshold of Significance for Greenhouse Gases**

<b>Land Development and Construction Projects</b>		
	<b>Construction Phase</b>	<b>Operational Phase</b>
Greenhouse Gas as CO <sub>2</sub> e	1,100 metric tons per year	1,100 metric tons per year
<b>Stationary Source Only</b>		
	<b>Construction Phase</b>	<b>Operational Phase</b>
Greenhouse Gas as CO <sub>2</sub> 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 CO<sub>2</sub>e 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-7, GHG emissions resulting from the project is the largest contributing 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***

The resultant GHG emissions of the project were calculated using the CalEEMod, version 2016.3.2. 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-6 illustrates the specific construction-generated GHG emissions that would result from construction of the project.

**Table IS-6: Construction-Related Greenhouse Gas Emissions (Metric Tons per Year)**

<b>Emissions Source</b>	<b>CO<sub>2</sub>e</b>
SMAQMD Construction Threshold	1,100
Project Construction-Related Emissions	70.10
<b>Exceeds Threshold?</b>	<b>No</b>

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

As shown in Table IS-6, Project construction would result in the generation of approximately 71 metric tons of CO<sub>2</sub>e 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 CO<sub>2</sub>e.

#### **OPERATIONAL-GENERATED GREENHOUSE GAS EMISSIONS**

Operation of the Project would result in GHG emissions predominantly associated with motor vehicle use. Table IS-7 summarizes all the direct and indirect annual GHG emissions level associated with the Project.



**Table IS-7: Operational-Related Greenhouse Gas Emissions (Metric Tons per Year)**

<b>Emissions Source</b>	<b>CO<sub>2</sub>e</b>
Area Source (landscaping, hearth)	0.0
Energy	12.59
Mobile	576.74
Waste	0.0
Water	0.16
<b>Total</b>	<b>589.48</b>

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

As shown in Table IS-7, the Project would produce 589.48 metric tons of CO<sub>2</sub>e 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-7, GHG emissions resulting from project-related transportation sources is the largest source of emissions; 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 an "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**

NOTE: It is the opinion of the preparers of this Initial Study/Negative Declaration that Mitigation Monitoring and Reporting Program is not required for this project, at this time. To ensure protection of cultural resources, Mitigation Measure A shall be included verbatim as a Construction Note on any/all plans and specifications for the project:

**MITIGATION MEASURE A: INADVERTENT DISCOVERIES**

If potential tribal cultural resources (TCRs), archaeological resources, other cultural resources, articulated, or disarticulated human remains are discovered during

construction activities, work will cease within 100 feet of the find (based on the apparent distribution of cultural resources), whether or not a Native American Monitor from a traditionally and culturally affiliated Native American Tribe is present. The Office of Planning and Environmental Review shall be immediately notified at (916) 874-6141. A qualified cultural resources specialist and Native American Representatives and Monitors from traditionally and culturally affiliated Native American Tribes will assess the significance of the find and make recommendations for further evaluation and treatment as necessary. Culturally appropriate treatment may be, but is not limited to, processing materials for reburial, minimizing handling of cultural objects, leaving objects in place within the landscape, returning objects to a location within the project area where they will not be subject to future impacts. The Tribe does not consider curation of TCRs to be appropriate or respectful and request that materials not be permanently curated, unless requested by the Tribe.

Treatment that preserves or restores the cultural character and integrity of a Tribal Cultural Resource may include Tribal Monitoring, culturally appropriate recovery of cultural objects, and reburial of cultural objects or cultural soil. These recommendations will be documented in the project record. For any recommendations made by traditionally and culturally affiliated Native American Tribes that are not implemented, a justification for why the recommendation was not followed will be provided in the project record.

If adverse impacts to tribal cultural resources, unique archeology, or other cultural resources occurs, then consultation with UAIC, Wilton Rancheria, Lone Band of Miwoks, and other traditionally and culturally affiliated Native American Tribes regarding mitigation contained in the Public Resources Code sections 21084.3(a) and (b) and CEQA Guidelines section 15370 should occur, in order to coordinate for compensation for the impact by replacing or providing substitute resources or environments.

In addition, pursuant to Section 5097.97 of the State Public Resources Code and Section 7050.5 of the State Health and Safety Code, in the event of the discovery of human remains, all work is to stop and the County Coroner and Office of Planning and Environmental Review shall be immediately notified. If the remains are determined to be Native American, guidelines of the Native American Heritage Commission shall be adhered to in the treatment and disposition of the remains.

## **INITIAL STUDY CHECKLIST**

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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
<b>1. LAND USE - Would the project:</b>					
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, Orangevale Community Plan, Greenback Lane Specific 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.
<b>2. POPULATION/HOUSING - Would the project:</b>					
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 proposed project consists of a gas station and convenience store and will not directly or indirectly contribute to unplanned population growth.
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.
<b>3. AGRICULTURAL RESOURCES - Would the project:</b>					
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.



	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
b. Conflict with any existing Williamson Act contract?				X	No Williamson Act contracts apply to the project site.
c. Introduce incompatible uses in the vicinity of existing agricultural uses?				X	The project does not occur in an area of agricultural production.
<b>4. AESTHETICS - Would the project:</b>					
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		Construction will not substantially degrade the visual character or quality of the project site. 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 result in new sources of lighting, but will not result in safety hazards or adversely affect day or nighttime views in the area.
<b>5. AIRPORTS - Would the project:</b>					
a. Result in a safety hazard for people residing or working in the vicinity of an airport/airstrip?				X	The project occurs outside of any identified public or private airport/airstrip safety zones.
b. Expose people residing or working in the project area to aircraft noise levels in excess of applicable standards?				X	The project occurs outside of any identified public or private airport/airstrip noise zones or contours.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
c. Result in a substantial adverse effect upon the safe and efficient use of navigable airspace by aircraft?				X	The project does not affect navigable airspace.
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.
<b>6. PUBLIC SERVICES - Would the project:</b>					
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		Project construction would not require the addition of new stormwater drainage facilities.
f. Result in substantial adverse physical impacts associated with the provision of electric or natural gas service?			X		Minor extension of utility lines may 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 require park and recreation services.
<b>7. TRANSPORTATION/TRAFFIC - Would the project:</b>					
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		Fehr & Peers prepared a traffic study for the proposed project. The traffic study concluded that the project will result in minor increases in vehicle trips, but this increase will not cause, either individually or cumulatively, a level of service standard established by the County to be exceeded.
b. Result in a substantial adverse impact to access and/or circulation?			X		A 35-foot portion of the existing commercial driveway off Greenback Lane will remain and a new 35-foot commercial driveway will be constructed at the southeast corner of the project site off Main Avenue; however, the project will not result in a substantial adverse impact.  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
c. Result in a substantial adverse impact to public safety on area roadways?			X		<p>A 35-foot portion of the existing commercial driveway off Greenback Lane will remain and a new 35-foot commercial driveway will be constructed at the southeast corner of the project site off Main Avenue; however, the project will not result in a substantial adverse impact.</p> <p>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.</p>
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.
<b>8. AIR QUALITY - Would the project:</b>					
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		Compliance with existing dust abatement rules and standard construction mitigation for vehicle particulates will ensure that construction air quality impacts are less than significant. The California Emissions Estimator Model (CalEEMod) was used to analyze ozone precursor emissions. See the Air Quality Section of this document for an expanded discussion.
b. Expose sensitive receptors to pollutant concentrations in excess of standards?				X	<p>There are no sensitive receptors (i.e., schools, nursing homes, hospitals, daycare centers, etc.) adjacent to the project site.</p> <p>See Response 8.a.</p>

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
c. Create objectionable odors affecting a substantial number of people?			X		The project will not generate objectionable odors. See the Air Quality Section of this document for an expanded discussion.
<b>9. NOISE - Would the project:</b>					
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).
<b>10. HYDROLOGY AND WATER QUALITY - Would the project:</b>					
a. Substantially deplete groundwater supplies or substantially interfere with groundwater recharge?			X		The project will not substantially increase water demand over the existing use. The project will not rely on groundwater supplies and will not substantially interfere with groundwater recharge.
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		The project does not involve any modifications that would substantially alter the existing drainage pattern and or/increase the rate or amount of surface runoff in a manner that would lead to flooding. 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.



	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
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 is not within a 100-year floodplain as mapped on a federal Flood Insurance Rate Map, nor is the project within a local flood hazard area.
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	The project does not propose any physical changes that would affect runoff from the site. 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> <p>Sacramento County Code Chapters 6.28 and 6.32 provide rules and regulations for water wells and septic systems that are designed to protect water quality. The Environmental Health Division of the County Environmental Management Department has permit approval authority for any new water wells and septic systems on the site. Compliance with existing regulations will ensure that impacts are less than significant.</p>
<b>11. GEOLOGY AND SOILS - Would the project:</b>					
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>

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
b. Result in substantial soil erosion, siltation or loss of topsoil?			X		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.
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	The project is not located on an unstable geologic or soil unit.
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.
<b>12. BIOLOGICAL RESOURCES - Would the project:</b>					
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	The project site is located along a busy corridor in an urbanized area. The entire parcel is currently developed and no vegetation exists on site or the adjacent sites.  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.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
b. Have a substantial adverse effect on riparian habitat or other sensitive natural communities?				X	The project site is located along a busy corridor in an urbanized area. The entire parcel is currently developed and no vegetation exists on site. 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	The project site is already developed. Project implementation would not affect native resident or migratory species.
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.
<b>13. CULTURAL RESOURCES - Would the project:</b>					
a. Cause a substantial adverse change in the significance of a historical resource?				X	No historical resources would be affected by the proposed project.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
b. Have a substantial adverse effect on an archaeological resource?			X		No known archaeological resources occur on-site. The Northern California Information Center was contacted regarding the proposed project. A record search indicated that the project site is not considered sensitive for archaeological resources.
c. Disturb any human remains, including those interred outside of formal cemeteries?			X		The project site is located outside any area considered sensitive for the existence of undiscovered human remains. 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 a single request for consultation was received. Refer to the Cultural Resources discussion in the Environmental Effects section above.
<b>14. HAZARDS AND HAZARDOUS MATERIALS - Would the project:</b>					
a. Create a substantial hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X		See the Hazards and Hazardous Materials Section of this document for an expanded discussion.
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. The nearest school is located 0.33 miles to the southeast of the project site.



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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.
<b>15. GREENHOUSE GAS EMISSIONS – Would the project:</b>					
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. Please refer to the GHG Section.

## SUPPLEMENTAL INFORMATION

LAND USE CONSISTENCY	Current Land Use Designation	Consistent	Not Consistent	Comments
General Plan	Commercial/Offices	X		
Orangevale Community Plan	SPA	X		
Greenback Lane Special Planning Area	GC	X		
Land Use Zone	SPA	X		



## **INITIAL STUDY PREPARERS**

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