Office of Planning and Environmental Review
Leighann Moffitt, Director

County Executive
Navdeep S. Gill

Mitigated Negative Declaration

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

1. **Control Number: PLER2019-00074**

2. **Title and Short Description of Project:** North Area Recovery Station Master Plan
The North Area Recovery Station (NARS) Master Plan 2020-2030 (Master Plan or Plan) project is building and systems improvements necessary to meet the greater Sacramento region's waste management needs currently and beyond the final plan year of 2030. The Master Plan includes recommendations for immediate, near-term, and long-term improvements. The project improvements would occur over the course of four phases. The improvements include the following.
Expansion of the "Shed" by 40,000 sq ft to a total area of 75,000 sq ft and construction of a new, separate 119,000 square foot building intended for commercial vehicles only ("Packer Building"), both to be built to accommodate more customers and more tonnage of the various permitted waste types,
Demolition of existing 5,000 sq ft Administration Building and reconstruction of a 10,000 sq ft Administration Building at a new location near the front of the property,
Reduction of the 65,000 sq ft open-air area for receiving yard waste to 30,000 sq ft,
Reduction of the 18,000 sq ft total open-air area at various locations for receiving various customer-separated non-hazardous wastes. These activities will largely be relocated to "the Shed",
Demolition of all existing scales and scale-houses, and replacement with five scales and three scale-houses at the main entry/exit location, and construction of two automated scales for commercial customers only at different locations.
Reduction of the existing storm water storage detention basin to a single basin. Construction of an active storm water suspended solids removal plant if future regular monitoring results exceed permitted values.
The NARS Master Plan project includes revisions to a Solid Waste Facilities Permit (SWFP) issued by the California Department of Resources Recycling and Recovery (CalRecycle).
The project will also update the California General Permit for Storm Water Discharges Associated with Industrial Activities issued by the State Water Quality Control Board.

3. **Assessor's Parcel Number:** 240-0550-034-0000, 240-0550-047-0000, 240-0550-057-0000, 240-0550-049-0000

4. **Location of Project:** The project site is located at 4450 Roseville Road in the North Highlands Community. The project site is approximately 1,450 feet south of Winona Way and 1,700 feet north of Orange Grove Avenue

5. **Project Applicant:** Sacramento County Department of Waste Management and Recycling

6. Said project will not have a significant effect on the environment for the following reasons:
a. It will not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.
b. It will not have the potential to achieve short-term, to the disadvantage of long-term, environmental goals.
c. It will not have impacts, which are individually limited, but cumulatively considerable.

d. It will not have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly.

7. As a result thereof, the preparation of an environmental impact report pursuant to the Environmental Quality Act (Division 13 of the Public Resources Code of the State of California) is not required.

8. The attached Initial Study has been prepared by the Sacramento County Office of Planning and Environmental Review in support of this Negative Declaration. Further information may be obtained by contacting the Office of Planning and Environmental Review at 827 Seventh Street, Room 225, Sacramento, California, 95814, or phone (916) 874-6141.

[Original Signature on File]
Tim Hawkins
Environmental Coordinator
County of Sacramento, State of California

COUNTY OF SACRAMENTO
OFFICE OF PLANNING AND ENVIRONMENTAL REVIEW
INITIAL STUDY

PROJECT INFORMATION

CONTROL NUMBER: PLER2019-00074

NAME: North Area Recovery Station Master Plan

LOCATION: The project site is located at 4450 Roseville Road in the North Highlands Community. The project site is approximately 1,450 feet south of Winona Way and 1,700 feet north of Orange Grove Avenue (Plate IS-1).

ASSESSOR'S PARCEL NUMBER: 240-0550-034-0000, 240-0550-047-0000, 240-0550-057-0000, 240-0550-049-0000

APPLICANT: Sacramento County Department of Waste Management and Recycling
9850 Goethe Road
Sacramento, CA 95827
ATTN: Eric Vanderbilt, Senior Civil Engineer, Waste Management and Recycling

PROJECT DESCRIPTION

The project includes revisions to a Solid Waste Facilities Permit (SWFP) issued by the California Department of Resources Recycling and Recovery (CalRecycle).

The project will update the California General Permit for Storm Water Discharges Associated with Industrial Activities, Order 2014-0057-DWQ, issued by the State Water Quality Control Board (Waste Discharge ID 5S34I007295).

The North Area Recovery Station (NARS) Master Plan 2020-2030 (Master Plan or Plan) presents the building and systems improvements necessary to meet the greater Sacramento region's waste management needs currently and beyond the final plan year of 2030. The current permitted daily peak tonnage and traffic for NARS is 2,400 tons and 1,300 vehicles per day. The requested permit change is to increase the daily peaks to 2,730 tons and 2,275 vehicles. The current daily average values are approaching 1,200 tons of waste and 1,050 vehicles. It is anticipated that by 2050 1,950 tons of waste would daily be handled by the project with an average of 1,600 vehicles. The Master Plan includes recommendations for immediate, near-term, and long term improvements. The project improvements would occur over the course of four phases. Each Phase is described on the following pages.

PROJECT IMPROVEMENTS

PHASE 1

Phase 1 expands the road network and scale entry facility to improve traffic circulation (Plate IS-2 and Plate IS-3). Improvements would consist of:

- Construct a temporary commercial-only, automated entrance scale south of the existing Household Hazardous Waste (HHW) facility (Plate IS-2) to be relocated to south of the Packer Building in Phase 4
- Five scales at the north main entrance
- Three scale houses
- Right turn exit lane onto Roseville Road.
- Extension of household hazardous waste entrance/exit to the existing 'old scale' road, including access to the public restroom and parking
- Addition of second self-haul queue line at the Shed
- Two-way paved road east of the Shed (see Plate IS-3).
- By-pass ramp from the new two-way paved road to the compactor load out bay
- Demolition of truck wash area
- Reduction of the number of existing storm water storage detention basins from three basins to a single expanded stormwater storage basinPlate IS-2 shows the planned improvements to occur in Phase 1. Plate IS-3 illustrates traffic circulation at the site for Phase 1.

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Plate IS-1: Project Location

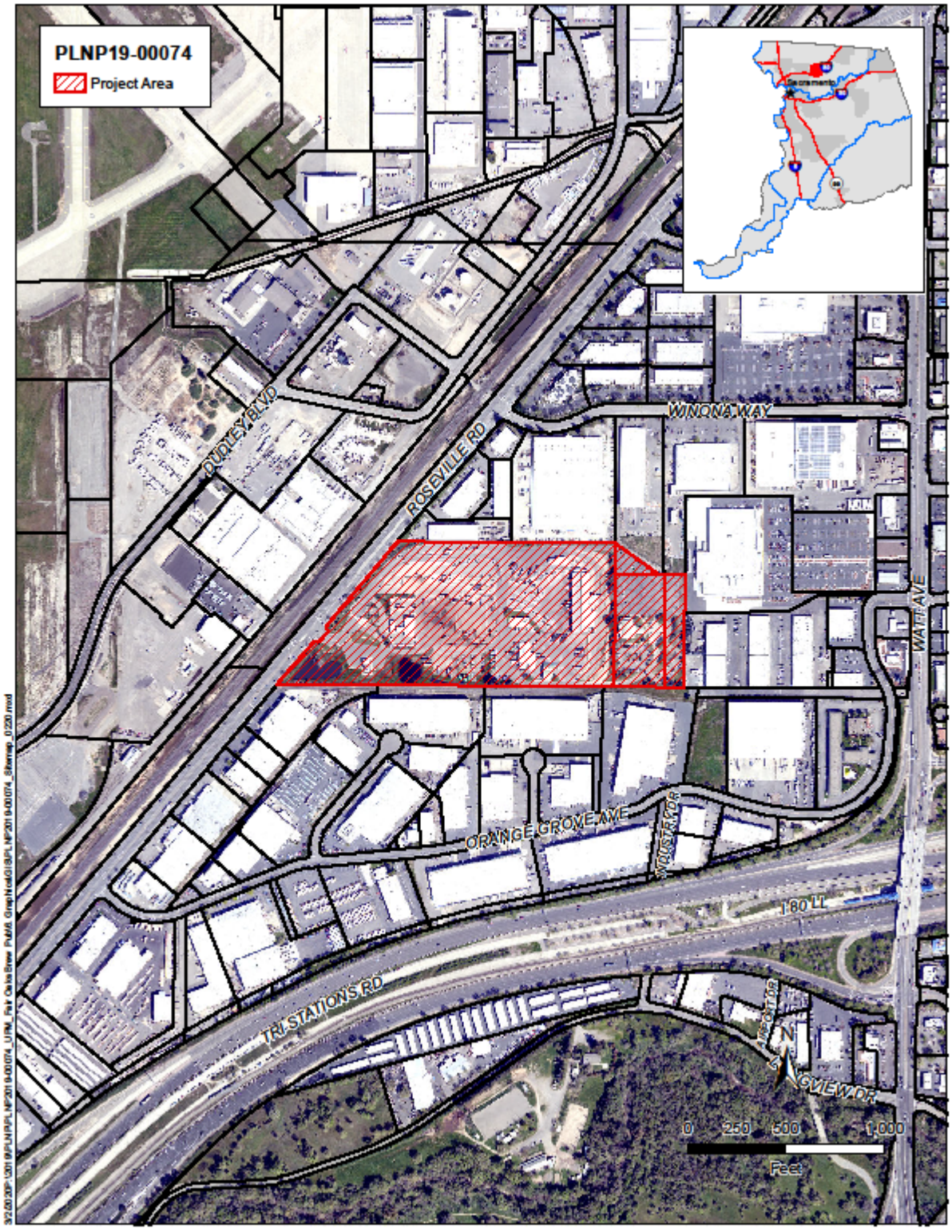
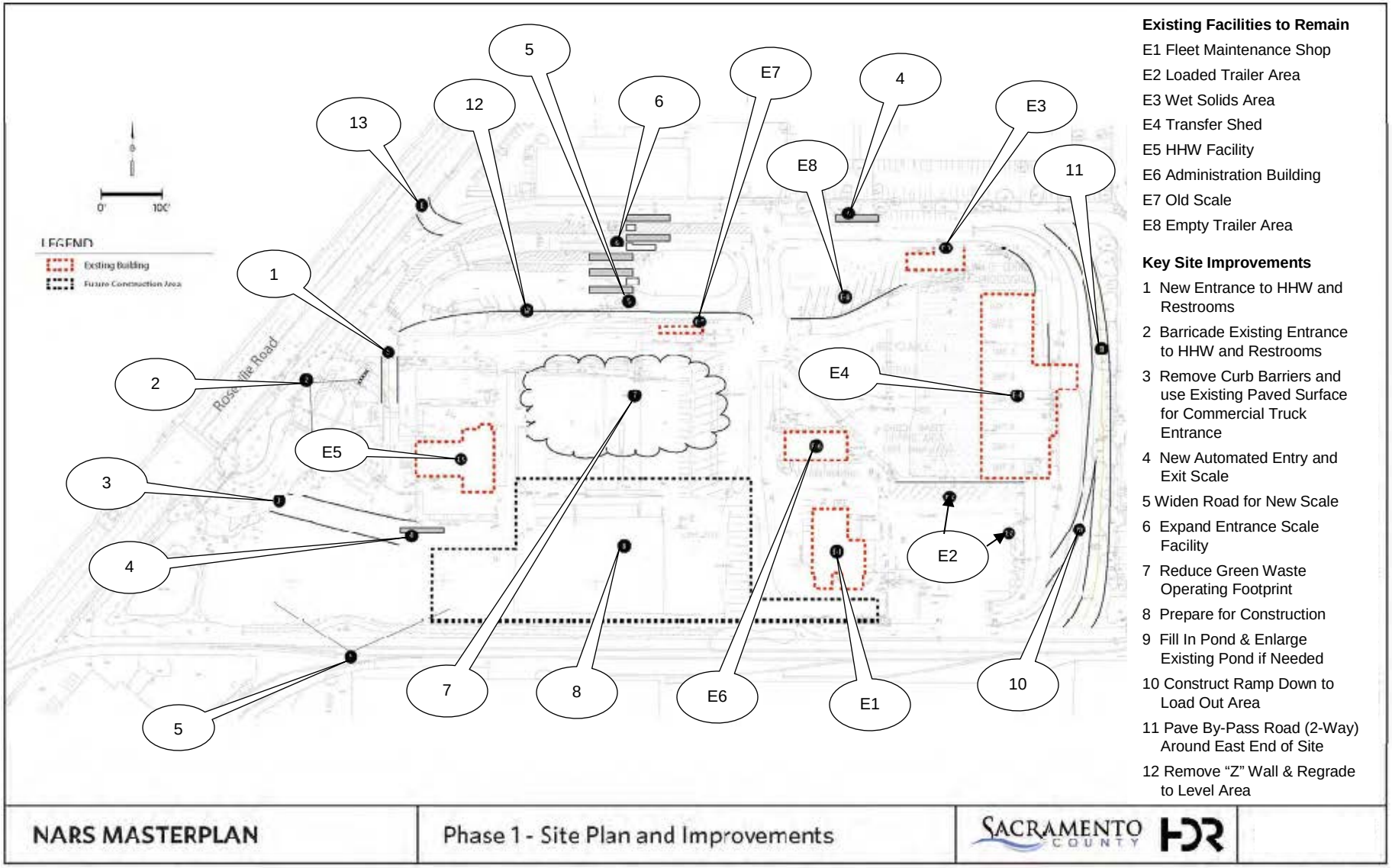


Plate IS-2: Phase 1 Improvements



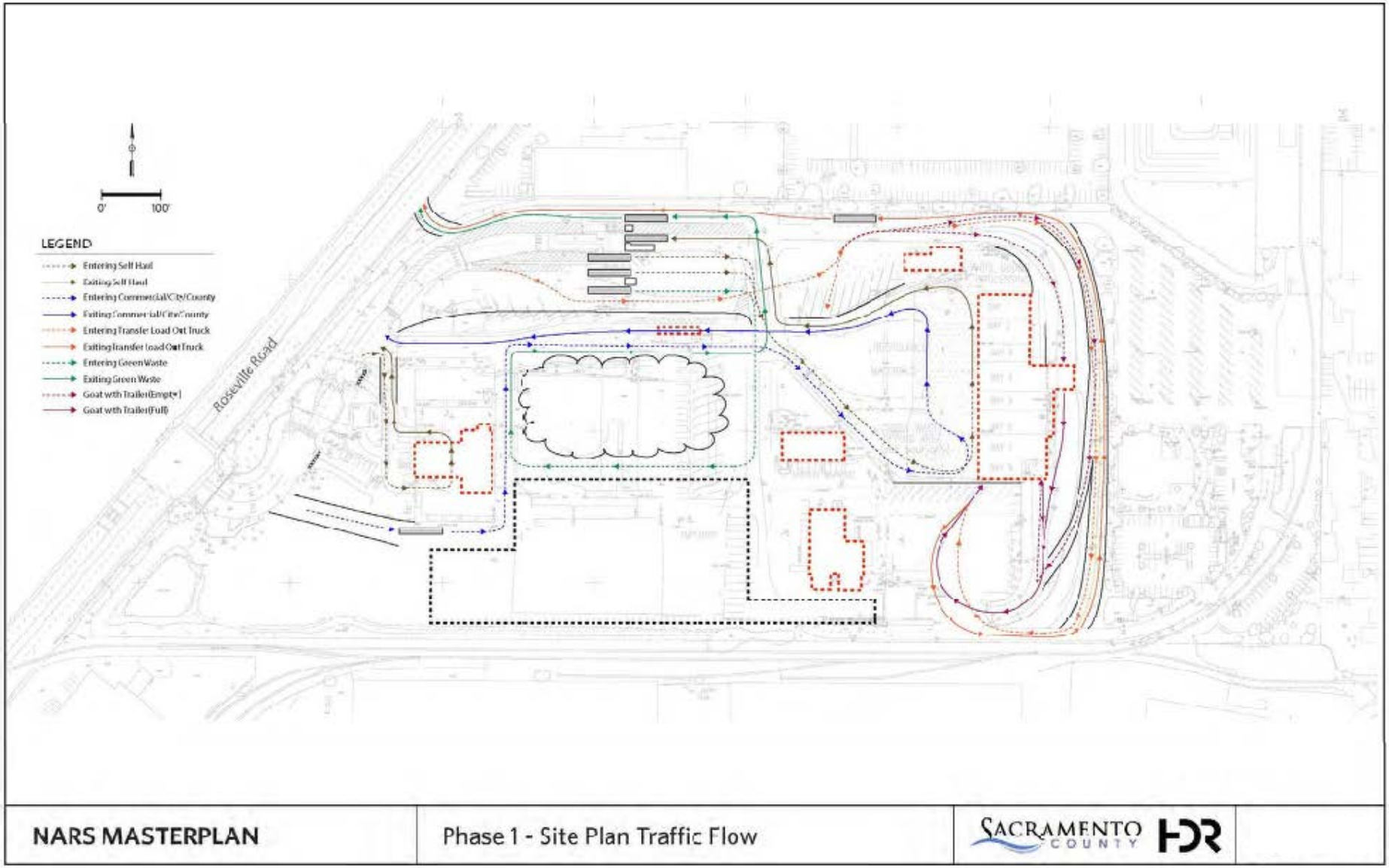
Existing Facilities to Remain

E1 Fleet Maintenance Shop
E2 Loaded Trailer Area
E3 Wet Solids Area
E4 Transfer Shed
E5 HHW Facility
E6 Administration Building
E7 Old Scale
E8 Empty Trailer Area

Key Site Improvements

1 New Entrance to HHW and Restrooms
2 Barricade Existing Entrance to HHW and Restrooms
3 Remove Curb Barriers and use Existing Paved Surface for Commercial Truck Entrance
4 New Automated Entry and Exit Scale
5 Widen Road for New Scale
6 Expand Entrance Scale Facility
7 Reduce Green Waste Operating Footprint
8 Prepare for Construction
9 Fill In Pond & Enlarge Existing Pond if Needed
10 Construct Ramp Down to Load Out Area
11 Pave By-Pass Road (2-Way) Around East End of Site
12 Remove "Z" Wall & Regrade to Level Area

Plate IS-3: Traffic Circulation



Phase 2

Phase 2 consists of the construction of a new enclosed 119,000 square-foot Packer Building for organics and Municipal Solid Waste (MSW) transfer to comply with SB 1383 diversion requirements. The Packer Building increases enclosed transfer capacity for organics (food and green waste) and MSW and includes an odor/air filter system. Roadway ramps supported with retaining walls will be constructed on the southern boundary to provide access to a waste transfer trench alongside the new Packer Building.

Plate IS-4 shows the planned improvements to occur in Phase 2. Plate IS-5 illustrates traffic circulation at the site for Phase 2. The construction of the Phase 2 Packer Building will change the site circulation. At this phase of development, the packer trucks will arrive and depart without encountering self-haul vehicles.

Plate IS-4: Phase 2 Improvements

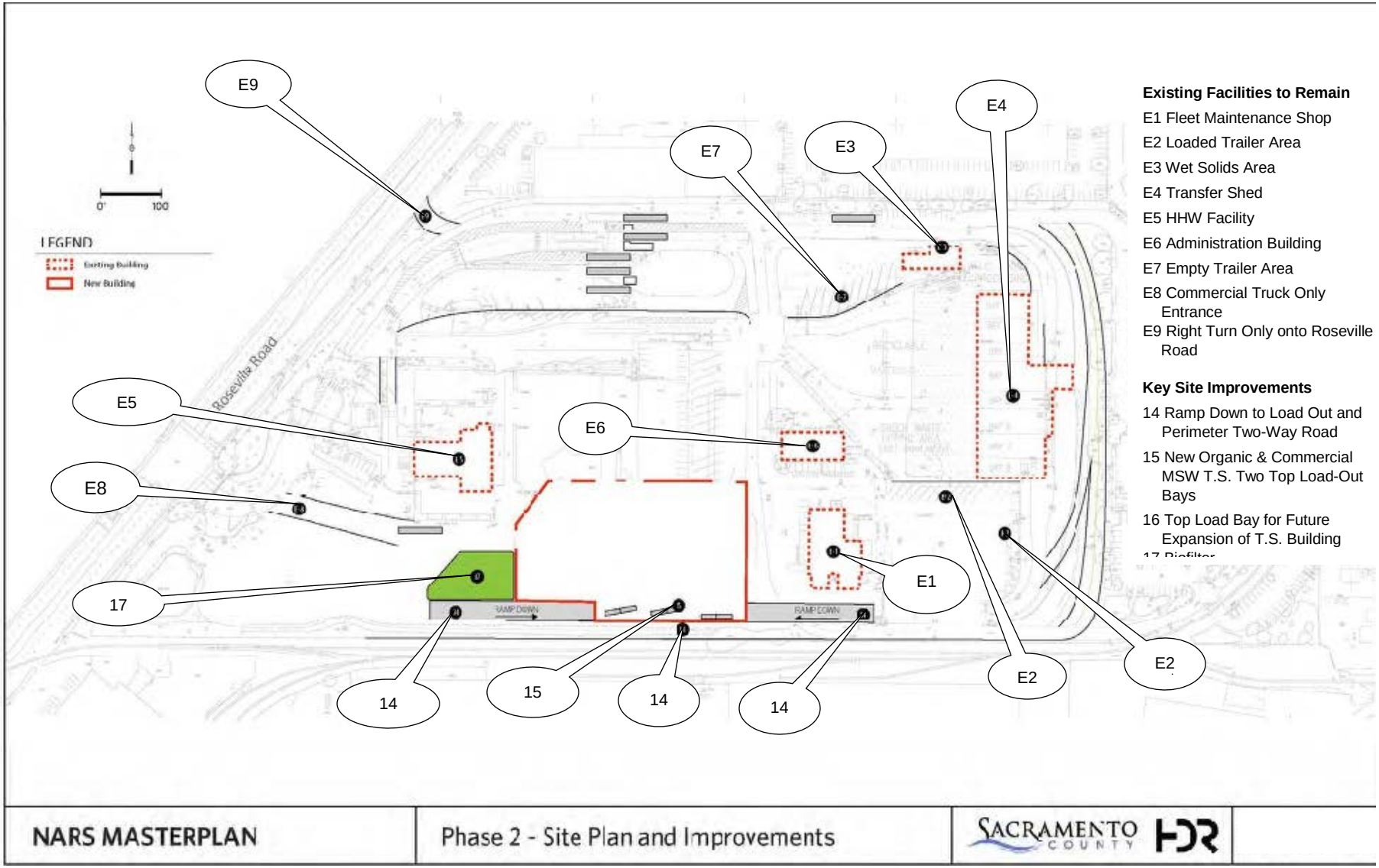


Plate IS-5: Phase 2 Traffic Circulation

PHASE 3

Phase 3 includes and accommodates expansion of the Shed.

- *New trailer staging area*. The new staging area will replace the current trailer staging area, which will need to be removed to make room for the Shed expansion.

- *Shed Expansion for self-haul unloading*. The Shed will be expanded by 40,000 square feet for a total area of 75,000 square feet) Self haul materials may include green waste.

- *Source Separated Recyclables (SSR)*. Although the County has contracted for SSR to be managed off-site, the possibility of changes in conditions could necessitate the use of NARS to receive and transfer SSR. .

- *Ramp down to new load-out bay*. The existing ramp below the north end of the Shed will need to be extended to the west to allow access beneath the expanded Shed. The 250-foot long ramp will commence near the west end of the expanded Shed structure to allow the proper gradient to the new load-out port. Retaining walls will be needed on both sides of the ramp to support the perimeter driveway north of the ramp and the Shed to the south of the ramp.

- *Ramp up from new load-out bay to perimeter two–way road*. Loaded trucks departing the new load-out bay at the expanded Shed will have the option of proceeding up a new ramp to reach the two-way perimeter road east of the Shed or continuing beneath the Shed through the Bay 4 load-out port. The ramp up to the perimeter road can be constructed as a part of the Shed expansion and new load-out bay facility.

Plate IS-6 shows the planned improvements to occur in Phase 3. Plate IS-7 illustrates traffic circulation at the site for Phase 3. Phase 3 traffic circulation adjustments will consist mostly of changes for the yard goat.

Plate IS-6: Phase 3 Improvements

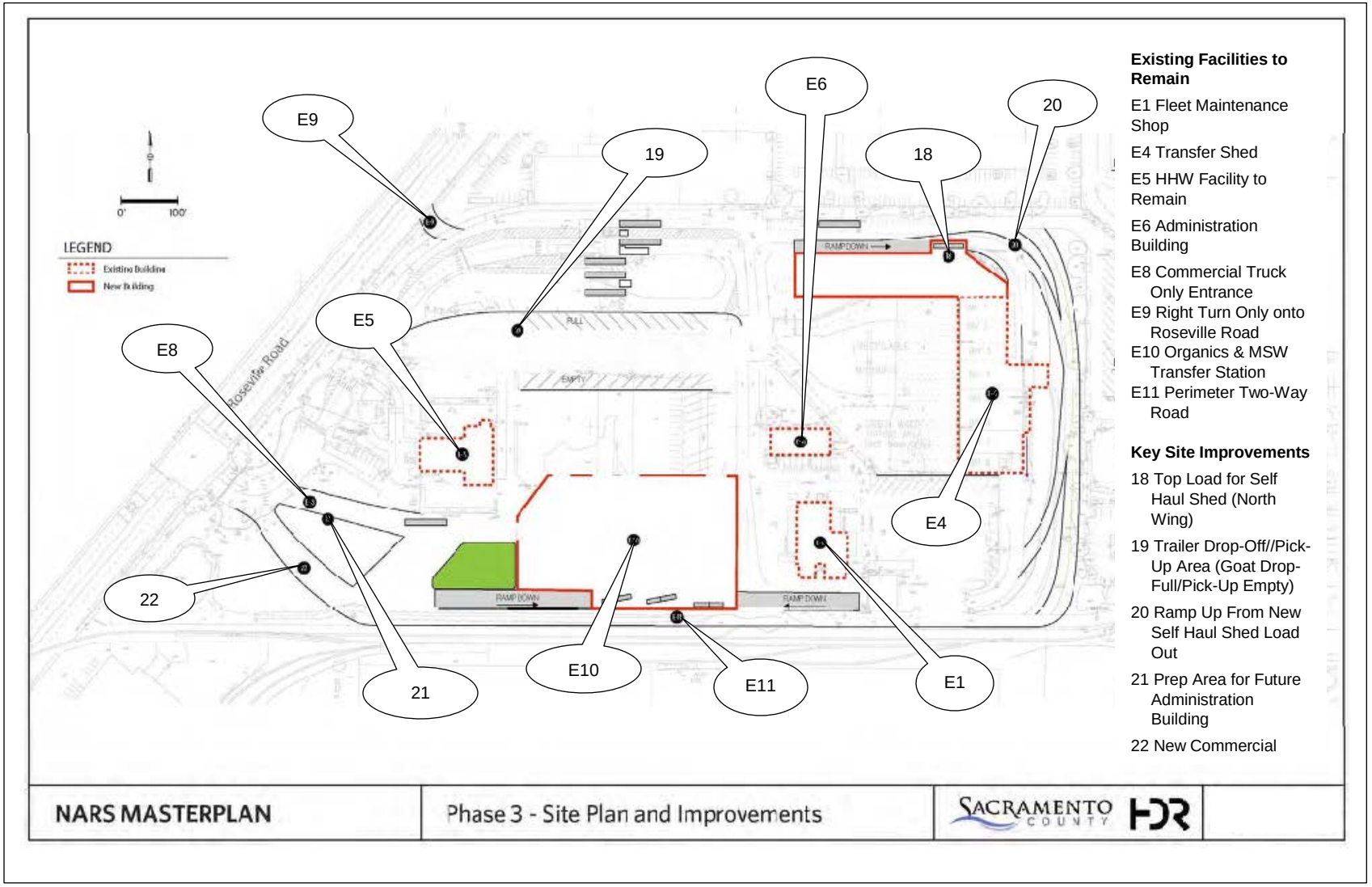
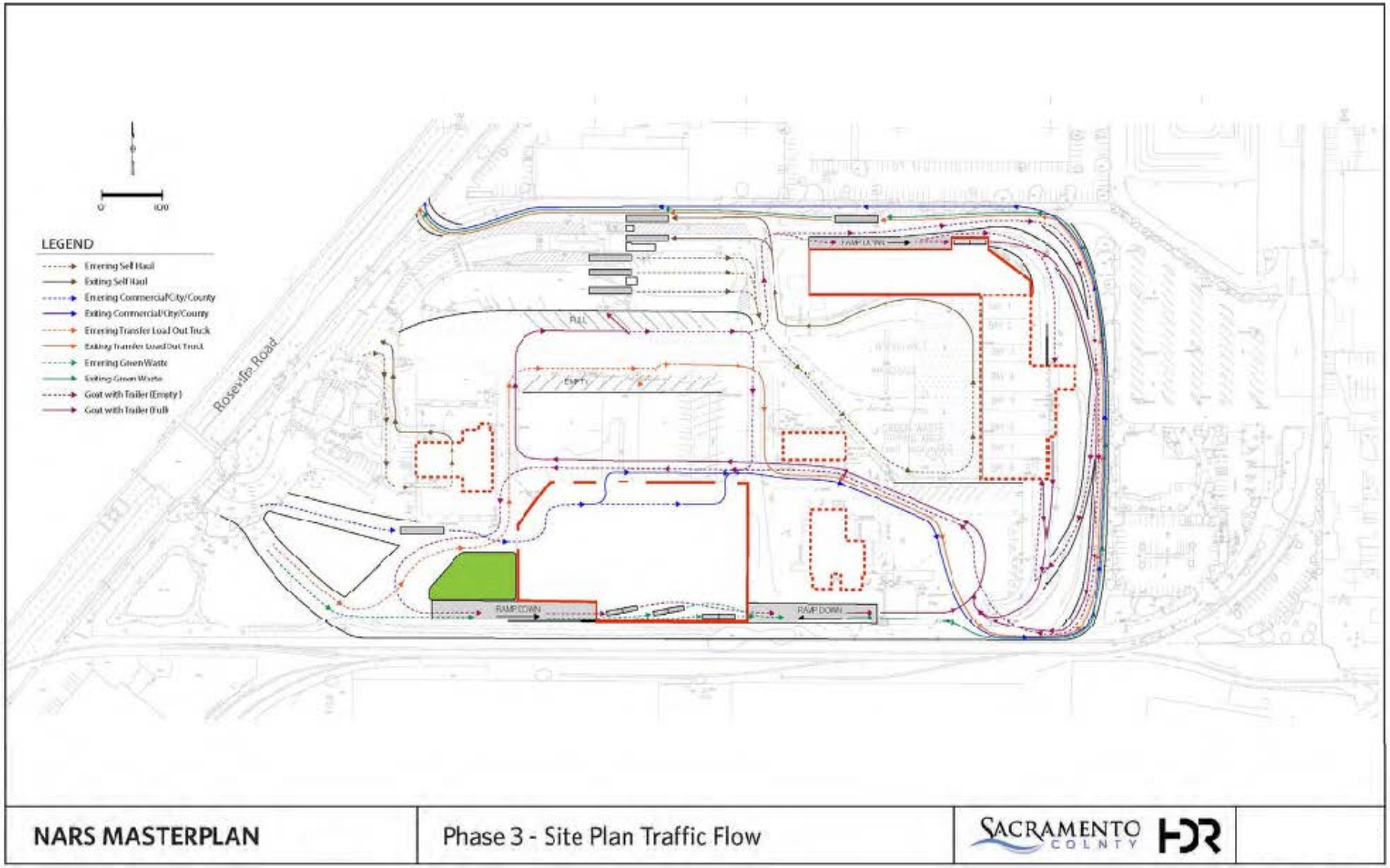


Plate IS-7: Phase 3 Traffic Circulation



PHASE 4

Expansion of the Packer Building to accommodate increased quantities in future years, and construction of a new Administration Building.

- *Expansion of the Packer Building*. The enclosed Packer Building will eventually require additional unloading and transfer capacity. The Phase 2 facility size is limited by the need to keep the Truck Maintenance Shop in operation for a minimum of five years. The Truck Maintenance Shop will be removed during Phase 4 when the enclosed Packer Building requires expansion. In the expansion, the building will be extended eastward with additional customer unloading bays provided.

- *Removal of the Maintenance Shop*.

- *Demolition of existing 5,000 square foot Administration Building.*

- *Construction of a 10,000 square foot Administration Building with employee and visitor parking*. A new parking lot for 60 vehicles (autos) would be located west of the new building.

- *Relocation of the commercial entrance scale*.

Plate IS-8 shows the planned improvements to occur in Phase 4.

Plate IS-9 illustrates traffic circulation at the site for Phase 4. The final traffic circulation pattern will provide for complete separation of packer truck traffic from self-haul vehicles.

Plate IS-10 shows the existing configuration of the project site as viewed from the southeast corner. Plate IS-11 shows the Final Buildout of the Master Plan Improvements and Plate IS-12 shows a photosimulation of the final configuration of the project site.

Plate IS-8: Phase 4 Improvements

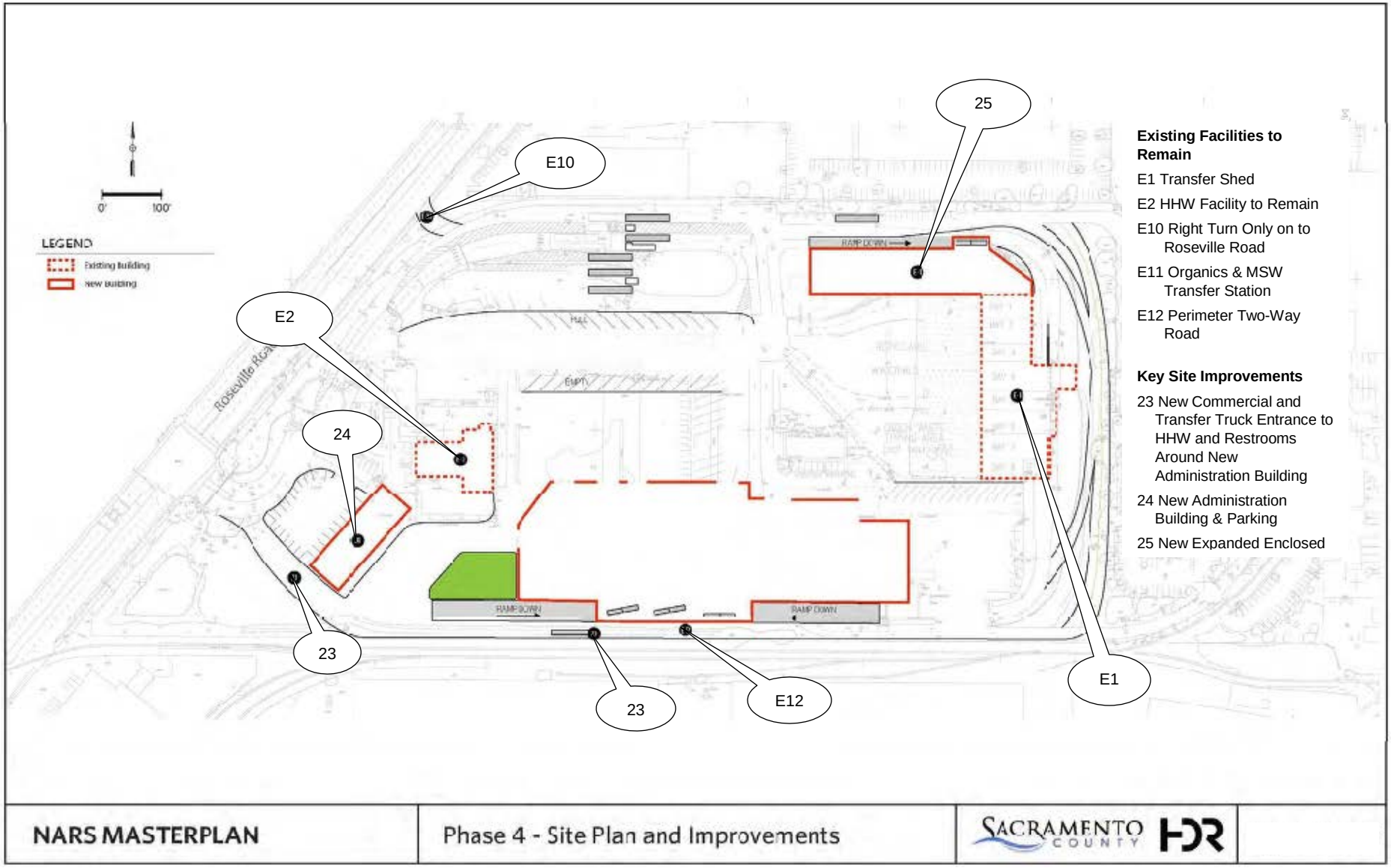


Plate IS-9: Phase 4 Traffic Circulation

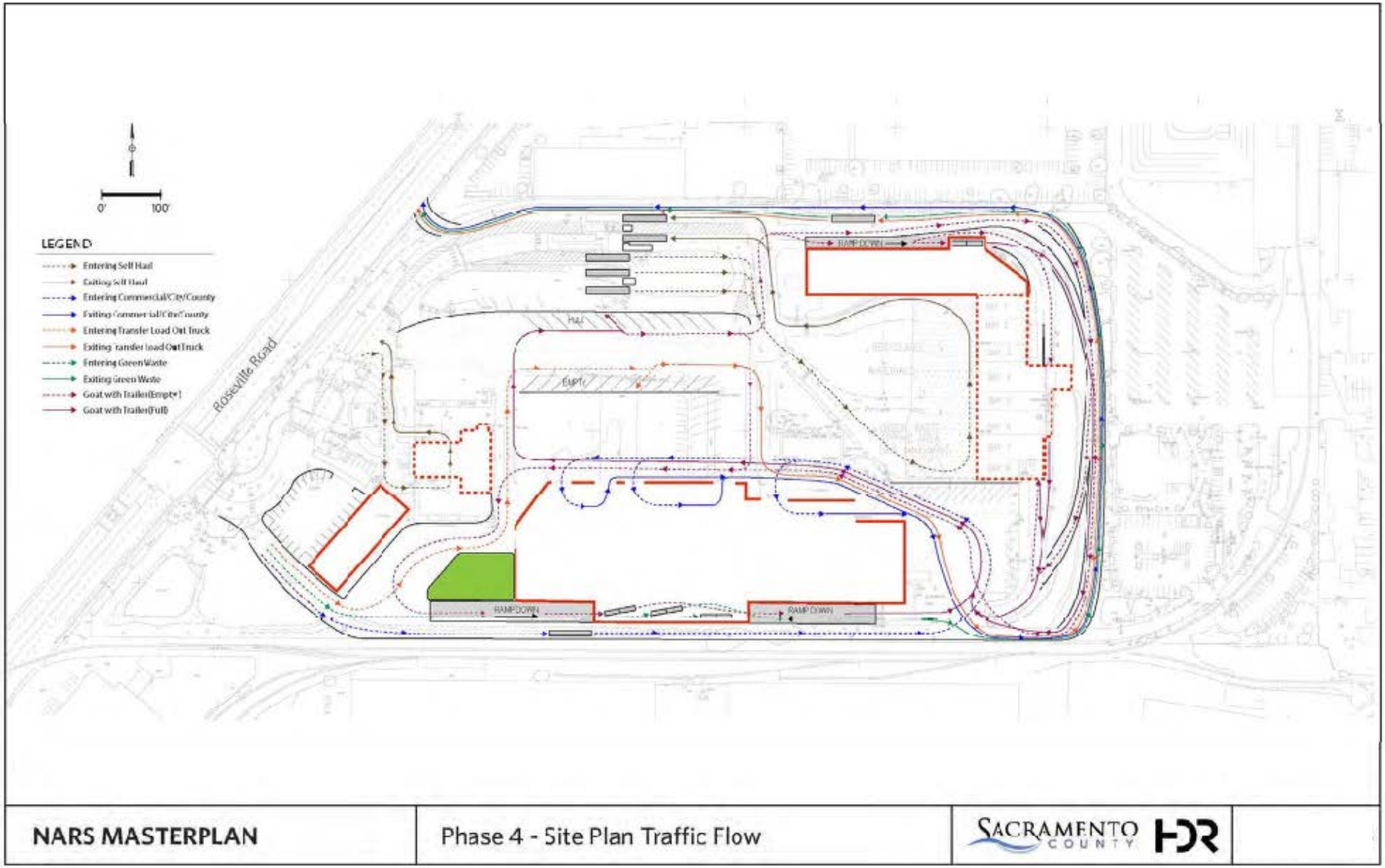


Plate IS-10: View of the Existing Project Configuration

Plate IS-11: Master Plan Final Buildout

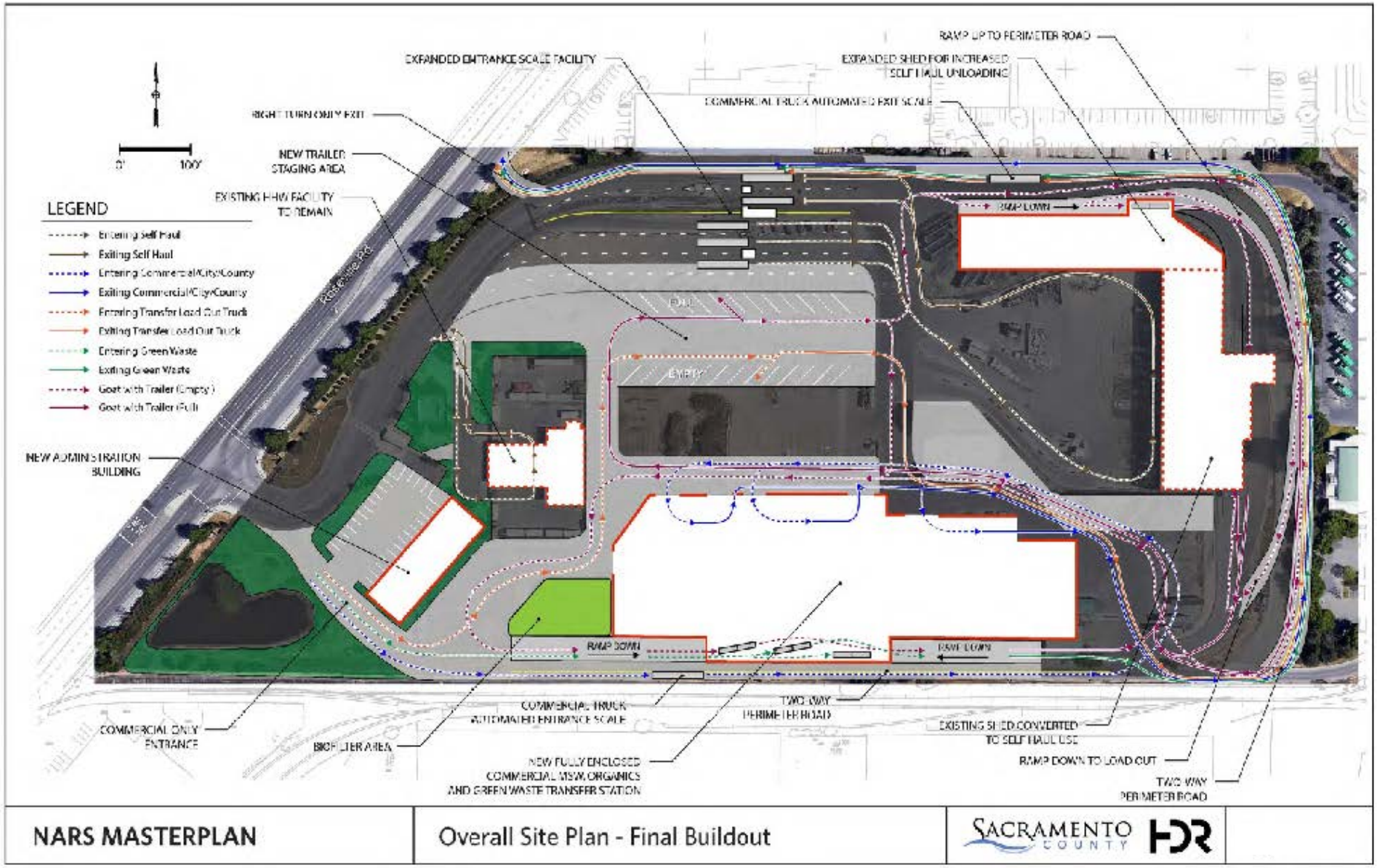


Plate IS-12: View of Future Configuration

ENVIRONMENTAL SETTING

The Sacramento County Department of Waste Management and Recycling (DWMR) operates the NARS. NARS is located at 4450 Roseville Road in the North Highlands Community; on a 23.5-acre lot. The project site is within the North Watt Avenue Corridor Special Planning Area (Plate IS-13) with a land use/zoning designation of M-1 (Light Industrial) (Plate IS-14). NARS is located adjacent to the McClellan Airport within 10,000 feet of McClellan's airport operations area.

NARS functions as a transfer/processing facility for municipal solid waste. Municipal solid waste includes residential, commercial, industrial, and self-haul, as well as source-separated materials from curbside collection programs, commercial recycling programs, separate yard waste collection and wet solids. No designated, special, medical or hazardous wastes other than Household Hazardous Waste are accepted at NARS. The Household Hazardous Wastes that are accepted include some acids, automotive fluids, household and auto batteries, cooking oil, fluorescent lamps and tubes, gasoline and other flammable materials, home generated hypodermic needles and syringes, household cleaners, paints, solvents and other universal waste.

In addition to the waste collection function, NARS also contains a liquefied natural gas (LNG) station that fuels the fleet of County waste and recycling collection trucks.

Plate IS-13: Land Use Map

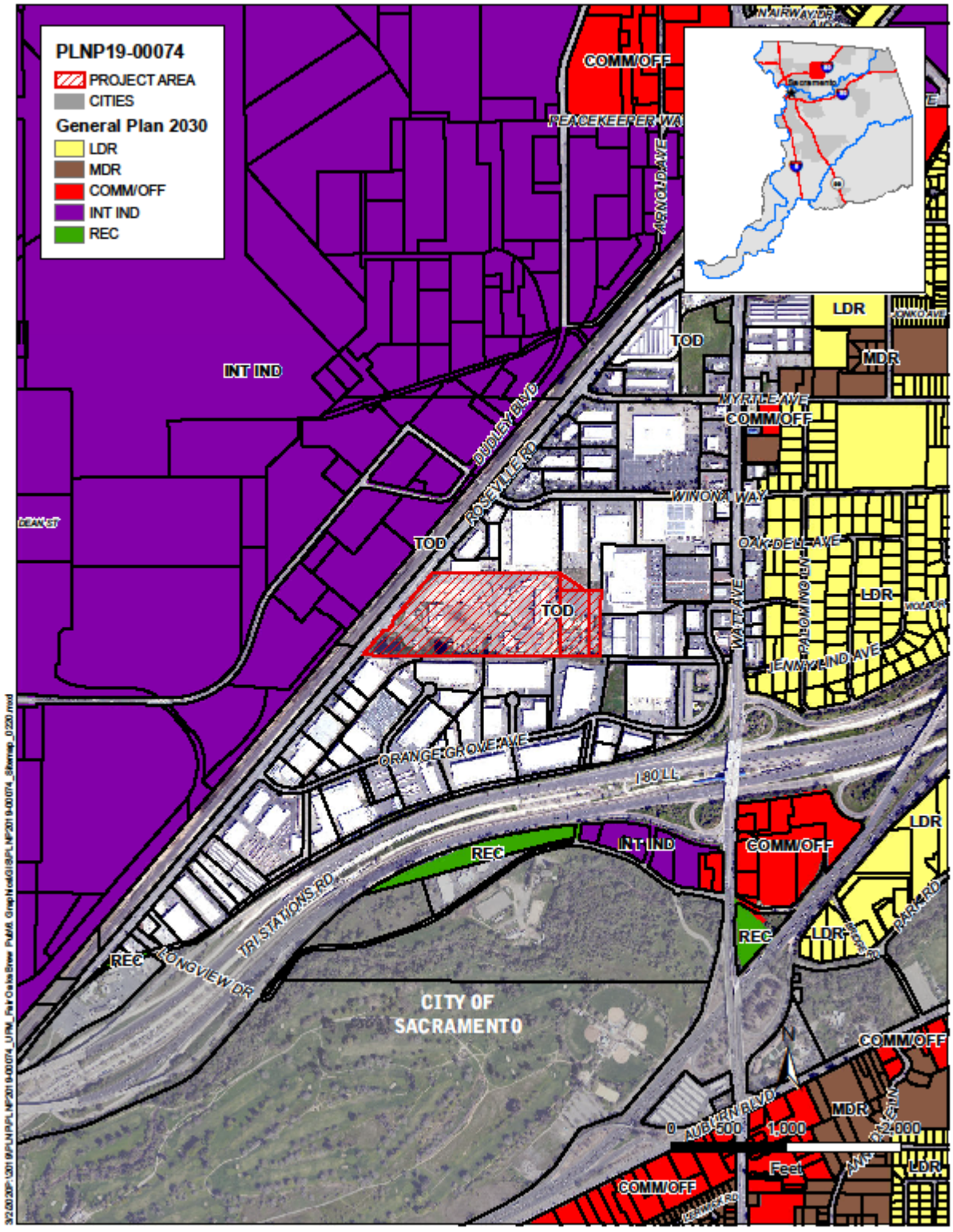
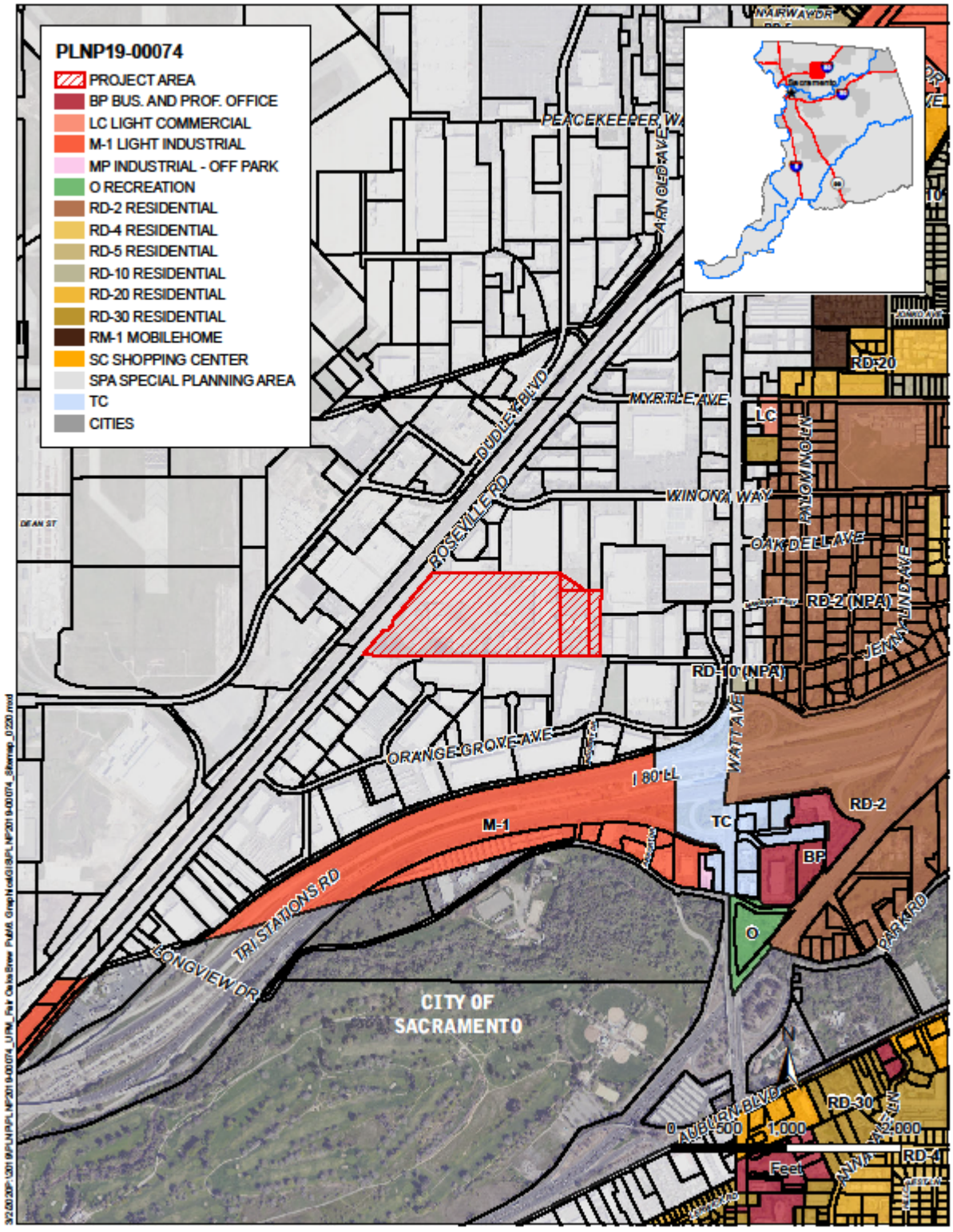


Plate IS-14: Zoning Map



ENVIRONMENTAL EFFECTS

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

BACKGROUND

NARS is, and historically has been, one of the most used solid waste facilities in the greater Sacramento region, serving a very high rate of self-haul users in addition to providing service to commercial waste collection vehicles, City of Sacramento (City) collection vehicles, and County of Sacramento (County) collection vehicles.

The NARS facility provides a conveniently located venue that accepts a wide variety of waste materials at a cost that is among the lowest among all similar facilities in the greater Sacramento region. Consequently, the facility is very popular, as evidenced by high vehicular traffic.

In light of decades of regional growth and significant regulatory changes since the transfer station was inaugurated in 1973 (though major upgrades in 1988 and 2000 have progressively accommodated that growth up until now), timely site improvements are necessary. Improvements are to address the following challenges:

- Very high traffic levels (mostly self-haul) are causing excessive queuing and limiting vehicle maneuverability at the site.
- The space occupied by the accumulating delivered material, and the space occupied by the customers delivering that material, interfere with efficient load out operations.
- Lack of sufficient separation between customers and large mobile County equipment and commercial vehicles.

In addition, the State-mandated organics diversion programs will require an enclosed building that does not currently exist at the site.

AIRPORTS

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

- Result in a safety hazard for people residing or working in the vicinity of an airport/airstrip?

- Expose people residing or working in the project area to aircraft noise levels in excess of applicable standards?

Consistency with the McClellan Airport Comprehensive Land Use Plan (CLUP)

The Sacramento County Airport System (SCAS) has commented on past projects at NARS. SCAS comments were concerned about the potential for Project generated hazardous wildlife attractants that could cause wildlife movement into or across approach or departure airspace at McClellan Airport (McClellan). SCAS also commented that the project site is located within 10,000 feet of McClellan's airport operations area (the area of the airport used or intended to be used for landing, takeoff, or surface maneuvering of aircraft). This 10,000 foot area is known as Perimeter B and is the area around McClellan in which the Federal Aviation Administration (FAA) recommends that hazardous wildlife attractants be discouraged. Finally, SCAS requested that the following information be considered during the design/ implementation of projects to reduce hazard risks:

> Reduce the time open water is present in the basins to the maximum extent practicable;
>
> Minimize the use of trees near the basins and swale, especially fruiting species, which may provide perching and roosting sites;

The proposed project will require the removal of trees. The proposed replacement tree plantings will not increase the number of trees on site. In addition, the replacement trees are not fruiting species nor located near the detention basin.

In the post project condition vegetation on site is not expected to provide additional areas for birds to utilize therefore, air hazard risks would remain the same as the current conditions.

The number of detention basins are being reduced. Therefore, the air hazard risks associated with open water would be ***less than significant***.

NARS is located near the eastern edge of McClellan being approximately 2,100 feet west of the end of McClellan's southern runway. The project site is within the 60 dB CNEL contour of the airport, but is outside of the 65 dB CNEL contour. According to the Sacramento County Noise Element the transfer station would be a comparable land use within the 60 to 65 CNEL noise contours. Therefore, the operation of the transfer station would not expose people using the transfer station or working at the site to noise levels in excess of applicable standards. Impact would be ***less than significant***.

Transportation/Traffic

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

- Conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) – measuring transportation impacts individually or cumulatively, using a vehicles miles traveled standard established by the County?

- Result in a substantial adverse impact to access and/or circulation?

- Result in a substantial adverse impact to public safety on area roadways?

- Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

The site is a waste disposal facility used by self-haulers, commercial disposal companies and the City and County of Sacramento. The site is located within an industrial area near Sacramento McClellan Airport. The nearest roadway is Roseville Road, which is two lanes in each direction separated by a median.

Table IS-2 shows the screening criteria for whether a project could have significant traffic impacts based on Vehicle Miles Travel (VMT).

Table IS-1: Screening Criteria for CEQA Transportation Analysis for Development Projects

Type	Screening Criteria
Small Projects	• Projects generating less than 237 average daily traffic (ADT)
Local Serving Retail[1]	• 100,000 square feet of total gross floor area or less; OR if supported by a market study with a capture area of 3 miles or less; AND • Local Serving: Project does not have regional-serving characteristics
Local-Serving Public Facilities/Services	• Transit centers • Day care center • Public K-12 schools • Neighborhood park (developed or undeveloped) • Community center • Post offices • Police and fire facilities • Branch libraries • Government offices (primarily serving customers in-person) • Utility, communications, and similar facilities • • Water sanitation, waste management, and similar facilities
Projects Near Transit Stations	• High-Quality Transit: Located within ½ a mile of an existing major transit stop[2] or an existing stop along a high-quality transit corridor[3]; AND • Minimum Gross Floor Area Ratio (FAR) of 0.75 for office projects or components; AND • Parking: Provides no more than the minimum number of parking spaces required[4]; AND • Sustainable Communities Strategy (SCS): Project is not inconsistent with the adopted SCS; AND • Affordable Housing: Does not replace affordable residential units with a smaller number of moderate- or high-income residential units; AND • Active Transportation: Project does not negatively impact transit, bike or pedestrian infrastructure.
Restricted Affordable Residential Projects	• Affordability: Screening criteria only apply to the restricted affordable units; AND • Restrictions: Units must be deed-restricted for a minimum of 55 years; AND • Parking: Provides no more than the minimum number of parking spaces required4; AND • Transit Access: Project has access to transit within a ½ mile walking distance; AND • • Active Transportation: Project does not negatively impact transit, bike or pedestrian infrastructure.
1 See Appendix A for land use types considered to be retail. 2 Defined in the Pub. Resources Code § 21064.3 (“Major transit stop’ means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the	

intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods").

3 Defined in the Pub. Resources Code § 21155 ("For purposes of this section, a high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours").

4 Sacramento County Zoning Code Chapter 5: Development Standards

As a waste management facility the proposed project would be considered a Local Serving Public Facility/Service therefore, the project would screen out for additional transportation analysis. Based on VMT screening criteria the traffic impacts of the project would be ***less than significant***.

The project does not conflict with adopted policies and would not impact the development of existing plans or programs. Impacts to access, circulation and alternative transportation are ***less than significant***.

AIR QUALITY

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

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

- 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-2: Air Quality Standards Attainment Status

Pollutant	Attainment with State Standards	Attainment with Federal Standards
Ozone	Non-Attainment (1 hour Standard[1] and 8 hour standard)	Non-Attainment, Classification = Severe -15* (8 hour[3] Standards) Attainment (1 hour standard[2])
Particulate Matter 10 Micron	Non-Attainment (24 hour Standard and Annual Mean)	Attainment (24 hour standard)

Particulate Matter 2.5 Micron	Attainment (Annual Standard)	Non-Attainment (24 hour Standard) and 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[4]	Attainment (1 hour and 24 hour Standards)	Attainment/unclassifiable[5]
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

1. Per Health and Safety Code (HSC) § 40921.59(c), the classification is based on 1989-1001 data, and therefore does not change.

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.

3. For the 1997, 2008 and the 2015 Standard.

4. Cannot be classified

5. Designation was made as part of EPA's designations for the 2010 SO_2 Primary National Ambient Air Quality Standard – Round 3 Designation in December 2017

* Designations based on information from http://www.arb.ca.gov/desig/changes.htm#reports

Source: SMAQMD. "Air Quality Pollutants and Standards". Web. Accessed: December 3, 2018. http://airquality.org/air-quality-health/air-quality-pollutants-and-standards

Table IS-3: SMAQMD Significance Thresholds

	ROG[1] (lbs/day)	NO_x (lbs/day)	CO ($\mu g/m^3$)	PM_{10} (lbs/day)	$PM_{2.5}$ (lbs/day)
Construction (short-term)	None	85	CAAQS[2]	80[3*]	82[3*]
Operational (long-term)	65	65	CAAQS	80[3*]	82[3*]

1. Reactive Organic Gas

2. California Ambient Air Quality Standards

3*. Only applies to projects for which all feasible best available control technology (BACT) and best management practices (BMPs) have been applied. Projects that fail to apply all feasible BACT/BMPs must meet a significance threshold of 0 lbs/day.

Construction Emissions/Short-Term Impacts

Short-term air quality impacts are mostly due to dust (PM_{10} and $PM_{2.5}$) generated by construction and development activities, and emissions from equipment and vehicle engines (NO_x) 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_{10} and $PM_{2.5}$ 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 PM10 or PM2.5 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

Ozone Precursor Emissions (NO_x)

The SMAQMD Guide currently provides screening criteria for construction-related ozone precursor emissions (NO_x) 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_x 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.

EMISSIONS MODELING

The California Emissions Estimator Model (CalEEMod) was used to model project emissions. There are four primary construction phases of interest in the CalEEMod model: demolition, grading, paving, and building. While the project site is less than 35 acres and would not construct buildings more than 4 stories, the project would involve demolition of existing structures. The proposed project contains one building of approximately 5,000 square feet that will be demolished.

The Land Use designations used for CalEEMod were General Office Building for the proposed new Administration Building and Light Industrial for both the addition to the Shed and construction of the new Packer Building. Model reports showing emissions as pounds per day and an annual summary of tons are included in Appendix A. As there can be differences in the emissions between winter and summer the, tables for construction and operations show the maximum level of emissions for pounds per day per season.

Table IS-4: CalEEMod Results – Construction Phase NO_x

Construction Year	Constituent in pounds per day			
	ROG	NOx	PM_{10}	$PM_{2.5}$
2021	4.1541	42.4585	20.4016	11.9895
2022	85.7650	20.2856	1.6570	1.0976

As shown in the above table, the project will not exceed the significance thresholds established by SMAQMD. Therefore, the construction emissions 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 many types of projects which may include up to 485 new single family dwelling units for residential projects. For particulate matter emissions the screening table allows users to screen out projects which include up to 1,000 new single family dwelling units for residential projects. Depending on the type of commercial use, the screening level for both ozone precursor emissions and particulate matter emissions is hundreds of thousands of square feet of commercial use. The screening table cannot be used for projects where there is a mix of uses, the trip generation rates are higher than Model defaults, the project involves wood burning stoves, or is an industrial use.

The results of the CalEEMod model for the operational phase are shown in Table IS-4.

Table IS-5: Operational Phase Emissions

Operational Phase Constituent in pounds per day			
ROG	**NOx**	**PM_{10}**	**$PM_{2.5}$**
6.1411	8.4716	6.9915	1.9908

The emissions levels are all less than the thresholds established by SMAQMD. Therefore, impacts to air quality during the operations of the NARS would be ***less than significant***.

Odor

The SMAQMD CEQA Guide (December 2016) describes the District's expectations for odor analysis as follows:

> Due to the subjective nature of odor impacts, the number of variables that can influence the potential for an odor impact, and the variety of odor sources, there are no quantitative or formulaic methodologies to determine the presence of a significant odor impact. Rather, the District recommends that odor analyses strive to fully disclose all pertinent information.

In an effort to more fully describe potential odor impacts from the project, Jacobs presented an Odor Control Technical Memorandum (Appendix B), using quantitative

odor thresholds from the South Coast Air Quality Management District (SCAQMD) as a guide, and conducting dispersion modeling to quantify odor emissions.

The following discussion on odors and the potential impacts is taken from the NARS Conceptual Basis of Design – Odor Control Technical Memorandum prepared by Jacobs in December 2019 (Appendix B).

Odor emissions at NARS will be a combination of both inorganic and organic compounds.

Odors associated with MSW are generally a result of the gases produced during biological decomposition of the refuse. MSW with a higher organic content decaying under anaerobic (without air) conditions is likely to produce more odorous gases. Examples of these odorous compounds include hydrogen sulfide, dimethyl sulfide and mercaptans. Hydrogen sulfide (H2S) is familiar to many people and can be characterized as a “rotten egg” smell.

MSW odors can be characterized as primarily rancid odors followed by sulfur odors which become more dominant as an observer moves further away from the MSW. Fragrant odors can exist where green waste (GW) piles are present. Acetaldehyde (sweet, fruity), acetic acid (vinegar), and butyric acid (rancid) have been identified as primary odorants in terms of aldehydes and carboxylic acids. Methyl mercaptan (rotten vegetable) and H2S (rotten egg) have been identified as primary sulfur odorants. Ammonia can also be an important compound emitted from MSW when considering the feasibility of odor control measures.

General odor strength is identified as dilutions to threshold (D/T), detection threshold (DT), or recognition threshold (RT). DT is defined as the minimum concentration required to arouse a sensation. RT is defined as the minimum concentration required for the specific compound to be recognized. As such, DTs are generally lower than RTs. The term “threshold value” utilized herein refers to detection threshold.

DT is officially quantified via odor tests (AMST F679) conducted in a certified odor laboratory where air samples containing a combination of odorous compounds are diluted with clean air to below detectable concentrations and then introduced to a gas delivery system. A panel consisting of members trained in odor response serves as the odor “detectors”. Panel members are asked to smell air samples delivered to a nose cone piece by the gas delivery system. The panelist introduces three distinct samples, one with the diluted sample and two with clean dilution air. Panel members are then asked whether they can detect a difference in the odor of the samples. If they cannot, the sample concentration is then increased by a given dilution amount, and the test is repeated. This process continues until half the panel members can detect the sample odor. This final level of sample concentration is called DT. By this means broad spectrum odor concentration is determined based upon how many dilutions are required to make the odor barely perceptible to one half of the odor panelist regardless of what odor causing compound(s) are causing the odor.

Field olfactometry utilizes a field olfactometer, which dynamically dilutes the ambient air with carbon-filtered air, under less controlled conditions when compared to a certified odor laboratory, providing an indication of the number of dilutions of pure air required to get to the threshold of odor detection. Two concepts both express odors in terms of broad-spectrum odor impact as measured by the number of dilutions required to reach the threshold of detection.

Table IS-5 presents a relative comparison of human reactions to odors at varying D/T values emitted from typical organic waste processing facilities. These levels should be considered order-of-magnitude approximations because reactions to odors are dependent upon individual sensitivity of the receptor, as well as the origin of the odors and the level of background odor that the receptor may be accustomed to prior to the introduction of a new odor.

Table IS-6: Odor Strength Level Comparison and Typical Human Reactions

Odor Strength (D/T Level)	Description	Typical responds
Human Threshold	The lowest concentration at which the average nose can detect the odor.	The human nose can sense the odor and determine a difference from normal background odors. However, odor is not alarming at this level, just barely noticeable
5	Odor is slightly detectable above background odors.	The human nose may determine the source if the nose has previously experienced higher strengths of this same odor compound. Odor may cause slight annoyance to some receptors, but typically is not alarming.
10	Odor is detectable above background levels to sensitive receptors.	Some sensitive individuals can determine the source (especially if the odor is familiar to them), and the odor may cause nuisance odor response.
20	Odor is detectable above background levels to general public.	The human nose can determine the source, even if it has previously experienced it or not (may cause nuisance odor response with some individuals). depending circumstances such as the odor source and the frequency of odor impact
50	Odor is very detectable above background levels.	The human nose can easily determine the source, and the odor is most likely to result in a nuisance odor reaction with most individuals
100 (plus)	Odor is extremely noticeable above background levels.	The human nose can detect the source, and the odor typically results in a nuisance odor response.

Compiled from various case studies by CH2M (now Jacobs) at organic waste processing facilities based on the ASTM E679 method using the European presentation rate of 20 liters per minute.

REGULATORY REQUIREMENTS

The following two regulatory requirements related to odor constituents pertain to the NARS.

- South Coast Air Quality Management District (SCAQMD), Rule 410:

  - Total opening area shall be between 2-5 percent of the total surface area of exterior walls, floor area, and any horizontal roof projections.

  - Face velocity across openings must be between 100 fpm and 200 fpm into the building depending on the percent opening.

- The California Air Resources Board (CARB), Ambient Air Quality Standards (AAQS) for H2S is 0.03 ppmV (30 ppbV) based on a one-hour average. This 30 ppbV H2S limit exceeds the OTC for H2S (0.51 ppbV) by almost two orders of magnitude.

Therefore, for the NARS to remain a good neighbor, the recommended offsite odor goal for H2S should be more stringent than the regulatory standard value for H2S. A more stringent offsite H2S odor goal would ensure that the facility complies with local criteria and goes the extra step to further reduce the risk of causing noticeable nuisance level odors

RECOMMENDED OFFSITE ODOR GOAL

The NARS facility is adjacent to commercial facilities. The offsite goals for odor controls are:

- Operations at the NARS shall limit odors at the fence line and beyond to:

  - H2S: 2.5 ppbV based on one-hour average concentration and 99 percentile compliance.

  - D/T: 5 D/T based on one-hour average concentration and 99 percentile compliance.

AIR DISPERSION MODEL/METHODOLOGY

Dispersion modeling, using AERMOD, was completed to predict offsite impacts associated with odor emissions from NARS.

A level of conservatism was incorporated into the analysis to better represent worst-case conditions without overly inflating odor impact levels. As such, the dispersion model should be considered a risk assessment tool for assigning risk reduction to specific source control alternatives.

The model predicted dispersion over a land area, based on emission rates, local meteorological data, and surface (terrain) parameters. The model inputs are emission rates from odorous processes as well as local meteorological and terrain data. The model output predicts variations in odor concentration as a function of distance from the source.

The dispersion modeling of only D/T was used to predict offsite odor impacts. The matrix of expected odorants is included in the D/T analysis. Jacobs did not analyze impacts of individual odorants.

MODEL RESULTS

Table IS-6 show the results from the air dispersion model in terms of hours of exceedance and maximum offsite concentrations of D/T and H2S.

Table IS-7: Predicted Offsite Odor Impacts from NARS

Category	Number of Exceedance Hours > 5 D/T[1] over 1 year	Maximum Offsite Concentration (100 percentile)
Odor Strength (D/T)		
All the roof mounted exhaust fans	33	6.3
H2S (ppbv)		
All the roof mounted exhaust fans		4.4 3.1

1 Based on one-hour average concentration and 99 percentile compliance.

These results assumed normal operating conditions and does not consider occasional less optimal conditions such as extended organic waste storage time, atypical waste, open building doors and building equipment (e.g. exhaust fans) failure or maintenance conditions. These atypical situations may require some level of odor control to eliminate unwanted odor impacts in the surrounding community resulting in odor nuisance and complaints. A misting system incorporating a neutralizing agent could be considered for implementation within the NARS facility for these situations that more odorous air is generated and/or emitted from the NARS.

FINDINGS AND RECOMMENDATIONS

The technical memo made the following findings and recommendations with regards to the operation of NARS.

General findings from the NARS air dispersion model effort include:

- AERMOD results indicate that no treatment is required for meeting the offsite D/T odor goal under normal operating conditions.
- AERMOD results indicate that no treatment is required for meeting the offsite H2S odor goal under normal operating conditions.

Recommendations resulting from the NARS air dispersion model effort include:

- Rooftop exhaust fans should be provided with stack heights that extend just above the roof parapet walls
- MSW should not be allowed to remain within the facility for more than 24 hours

- A misting system incorporating a neutralizing agent should be implemented within the NARS facility in case odors are greater than predicted or for occasional less optimal conditions such as extended organic waste storage time, atypical waste, open building doors and building equipment (e.g. exhaust fans) failure or maintenance conditions.

These recommendations were incorporated into the final design for the Packer Building. Based on the results of the air distribution model and inclusion of the recommendations in the project's building design the impacts from odor would be ***less than significant***.

HYDROLOGY AND WATER QUALITY

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

1. 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?

2. Develop within a 100-year floodplain as mapped on a federal Flood Insurance Rate Map or within a local flood hazard area?

3. Place structures that would impede or redirect flood flows within a 100-year floodplain?

4. Create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality?

FLOODPLAIN

The project site is within two Federal Emergency Management Agency (FEMA) Flood Zone areas (Plate IS-15). Zone X and an area of 0.2 percent chance flood hazard (Flood Zone X-500), as determined by the 2012 FEMA Flood Insurance Rate Map, panel number 06067C0069H. Flood Zone X is defined as an "area determined to be outside the 500-year floodplain," which indicates there is statistically, for insurance rate mapping purposes, a less than 0.2 percent chance of a flood event occurring on the site for any given year. Flood Zone X-500 is defined as an "Area of 500-year flood; areas of 100-year flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 100-year flood." Therefore, these portions of the project site are areas between the 100-year flood plain and the 500-year flood zone. While the site is identified as a flood hazard area, FEMA considers the area as a "moderate risk" versus the high risk areas list as Flood Zone AE. Flood Zone X-500 does not require flood insurance and there are no Federal or local regulations that would preclude development within the zone. The Master Plan includes grading and other improvements to direct stormwater to an expanded detention basin prior to discharge and reduce flood impacts on site. Impacts would be ***less than significant***.

WATER QUALITY

CONSTRUCTION WATER QUALITY: EROSION AND GRADING

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

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

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

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

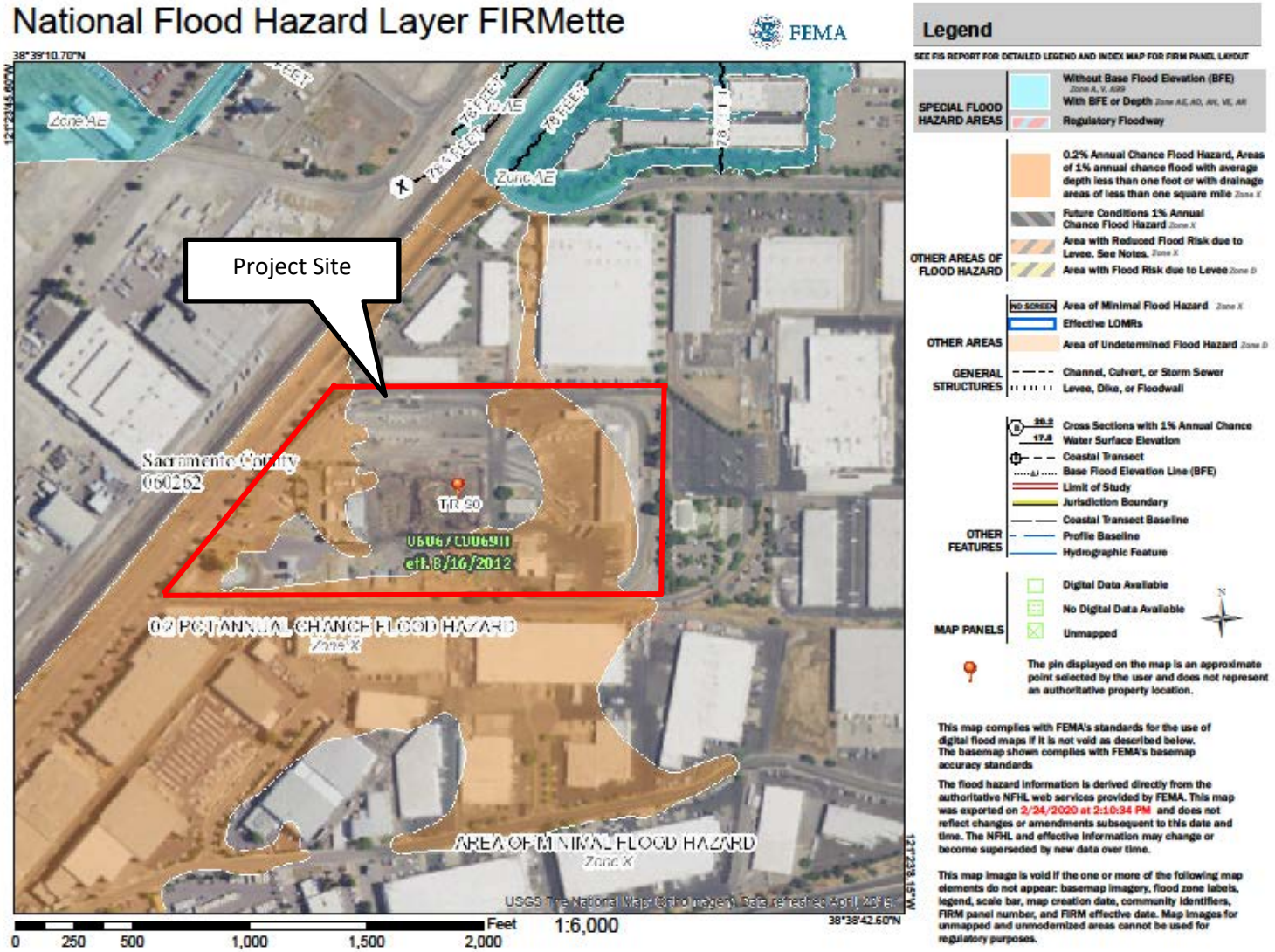
Applicable projects applying for a County grading permit must show proof that a WDID # has been obtained and must submit a copy of the SWPPP. Although the County has no enforcement authority related to the CGP, the County does have the authority to ensure

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

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

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

Plate IS-15: FEMA Map



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

The Federal Clean Water Act (CWA)1 prohibits discharges from point sources to waters of the United States, unless the discharges are in compliance with a National Pollutant Discharge Elimination System (NPDES) permit. (CWA § 301(a).) In 1987, the CWA was amended to establish a framework for regulating municipal storm water discharges and discharges of storm water associated with industrial activity (industrial storm water discharges) under the NPDES program. (CWA § 402(p).) In 1990, the United States Environmental Protection Agency (U.S. EPA) promulgated regulations, commonly known as Phase I, establishing application requirements for storm water permits for specified categories of industries. (40 C.F.R. § 122.26.) In 1992, U.S. EPA revised the monitoring requirements for industrial storm water discharges. (40 C.F.R. § 122.44(i)(2), (4), (5).) In 1999, U.S. EPA adopted additional storm water regulations, known as Phase II. (64 Fed. Reg. 68722.) The Phase II regulations provide for, among other things, a conditional exclusion from NPDES permitting requirements for industrial activities that have no exposure to storm water.

Industrial storm water discharges are regulated pursuant to CWA section 402(p)(3)(A). This provision requires NPDES permits for industrial storm water discharges to implement CWA section 301, which includes requirements for Dischargers to comply with technology-based effluent limitations, and any more stringent water quality-based limitations necessary to meet water quality standards. Technology-based effluent limitations applicable to industrial activities are based on best conventional pollutant

control technology (BCT) for conventional pollutants, and best available technology economically achievable (BAT) for toxic and non-conventional pollutants. (CWA § 301(b)(1)(A) and (2)(A).) To ensure compliance with water quality standards, NPDES permits may also require a Discharger to implement best management practices (BMPs). 40 Code of Federal Regulations section 122.44(k)(4) requires the use of BMPs to control or abate the discharge of pollutants when numeric effluent limitations (NELs) are infeasible.

On April 17, 1997, the State Water Board issued NPDES General Permit for Industrial Storm Water Discharges, Excluding Construction Activities, Water Quality Order 97-03-DWQ (previous permit). This General Permit, Order 2014-0057-DWQ rescinded the previous permit and serves as the statewide general permit for industrial storm water discharges. The State Water Board concludes that significant revisions to the previous permit requirements are necessary for implementation, consistency and objective enforcement. The General Permit requires Dischargers to:

- Eliminate unauthorized non-storm water discharges (NSWDs);
- Develop and implement storm water pollution prevention plans (SWPPPs) that include best management practices (BMPs);
- Implement minimum BMPs, and advanced BMPs as necessary, to achieve compliance with the effluent and receiving water limitations of this General Permit;
- Conduct monitoring, including visual observations and analytical storm water monitoring for indicator parameters;
- Compare monitoring results for monitored parameters to applicable numeric action levels (NALs) derived from the U.S. EPA 2008 Multi-Sector General Permit for Storm Water Discharges Associated with Industrial Activity (2008 MSGP) and other industrial storm water discharge monitoring data collected in California;
- Perform the appropriate Exceedance Response Actions (ERAs) when there are exceedances of the NALs; and,
- Certify and submit all permit-related compliance documents via the Storm Water Multiple Application and Report Tracking System (SMARTS). Dischargers shall certify and submit these documents which include, but are not limited to, Permit Registration Documents (PRDs) including Notices of Intent (NOIs), No Exposure Certifications (NECs), and Storm Water Pollution Prevention Plans (SWPPPs), as well as Annual Reports, Notices of Termination (NOTs), Level 1 ERA Reports, and Level 2 ERA Technical Reports.

This General Permit includes design storm standards for Dischargers implementing treatment control BMPs. The design storm standards include both volume- and flow-based criteria. Dischargers are not required to retrofit existing treatment control BMPs unless required to meet the technology-based effluent limitations and receiving water limitations in this General Permit.

The NARS Master Plan includes ground improvements such as the expansion of the existing detention basin and redirection of on-site stormwater flows to the expanded basin consistent with the General Order's BMP.

STORM DRAINAGE

HDR prepared a grading plan for the NARS Master Plan which included control of stormwater flows and drainage. Storm drainage at the site will generally continue to flow in the same areas as currently exist. The site is generally bisected by a very slight high point that divides storm water into a west and east tributary area. The high point is revealed by the aerial topography that illustrates a relief bisecting the current green waste south of the 'old scale'. Runoff west of the ridge drains southwesterly to the existing basins adjacent to Roseville Road. The westerly drainage area relies predominantly on surface drainage with only minimal drainage infrastructure at the Household Hazardous Waste (HHW) facility and along the northwest roadway. Water east of the access road is captured in drain inlets and directed via a sub-surface drainage system to a discharge pipe near the exiting Truck Maintenance Shop on the south side of the site.

Future storm drainage improvements at the site rely on the use of the west drainage basin as the discharge point. As new storm drainage conveyance system will capture surface water from the westerly drainage area using a series of inlets on the easterly edge of the existing HHW area. These inlets will capture storm water from the open/paved area currently occupied by the green waste area in addition to the new Packer building.

There are a total of three stormwater basins in the southwest corner of the property. The westerly most basin is to remain. The two basins east of the existing LNG fueling facility are anticipated to be filled in as a part of the construction of the Packer building. The remaining basin is to be enlarged and deepened so that the one basin provides a net total capacity approximately the same as existing three basins combined. In addition to changing drainage flow directions, the Packer building and associated paving, combined with the reduction of outdoor green waste operations, will increase the quantity of impervious surfaces at the site. This increase will result in reducing the time of concentration and increasing the storm water flow rate during storm events. Since the new storm drainage system north of the new Packer building will reroute some of the storm water from the westerly tributary area into the easterly drainage basin, it is anticipated that the enlarged single storm drainage basin will be able to accommodate the storm drainage areas that remain in the westerly drainage area.

For the west basin to be functional and to prevent stormwater from backing up in the drainage pipes, the pond would need to be deepened below the discharge elevation of

69.5 MSL to accommodate the design storm capacity and to provide sedimentation of silt captured from the operational surfaces of the facility. The existing Z-wall located south of the entrance scales were initially expected to be removed and this area leveled to allow stormwater from the southerly edge of the new scales to drain south and into the new drain inlets described above. However, recent discussions the County staff indicate the Z-wall may remain for the foreseeable future.

The loadout tunnel access will require a deep excavation at the site to provide access beneath the Packer building.

Other changes anticipated at the site include a renovation of the stormwater collection/pumping system at the loadout tunnel serving the Shed. This area has a history of flooding and needs to be remedied to improve functionality during inclement weather. The existing storm drain inlet system needs to be removed and replaced with a system that is easier to maintain, given the abundance of debris that occurs at this location. The current conveyance pipe connecting the existing inlets beneath the tunnel to the pumps located adjacent to the east side of the Shed may need to be replaced in its entirety. Alternatively, the storm water pumps may need to be moved to be closer to the inlet structures at the loadout area for easier access to remove debris and prevent flooding of this area.

Grading changes culminate to provide a net site balance of import and export, albeit without regard to site phasing. Areas such as the LNG fueling station and Truck Maintenance area will require a 'work around' to leave these features in place through the construction of the Packer building.

The final selection and design of operational stormwater quality control measures is subject to the approval of the Central Valley Regional Water Board. The project will update the California General Permit for Storm Water Discharges Associated with Industrial Activities, Order 2014-0057-DWQ, issued by the State Water Quality Control Board (Waste Discharge ID 5S34I007295).

Project compliance with Permit requirements will ensure that operational stormwater pollution impacts are ***less than significant***.

BIOLOGICAL RESOURCES

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

- Have a substantial adverse effect on any special status species, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, or threaten to eliminate a plant or animal community?

- Have a substantial adverse effect on riparian habitat or other sensitive natural communities?

- Have a substantial adverse effect on streams, wetlands, or other surface waters that are protected by federal, state, or local regulations and policies?

- Have a substantial adverse effect on the movement of any native resident or migratory fish or wildlife species?

- Adversely affect or result in the removal of native or landmark trees?

Special Status Species

A search of the California Natural Diversity Database (CNDDB) species list was used to determine the potential habitats and species which could be impacted by the project. Review of the CNDDB species list indicates that some sensitive habitats, plants, and animals occur within the Citrus Heights quadrangle and adjacent Rio Linda quadrangle. The CNDDB indicates documented occurrences of tricolor blackbird, Swainson's hawk, burrowing owl, bank swallow, Valley elderberry long horn beetle, vernal pool tadpole shrimp, vernal pool fairy shrimp, and steelhead within the specific quadrangles. However, the database does not indicate the presence of any of the above listed species within the project limits. The closest occurrence of the species listed above (i.e. vernal pool fairy shrimp) is greater than 2,300 feet from the project limits.

Native and Non-native Trees

The Sacramento County General Plan has identified the value of its native and landmark trees and has adopted measures for their preservation. The Tree Ordinance (Chapter 19.04 and 19.12 of the County Code) provides protections for landmark trees and heritage trees. The County Code defines a landmark tree as an "especially prominent or stately tree on any land in Sacramento County, including privately owned land" and a heritage tree as "native oak trees that are at or over 19" diameter at breast height (dbh)." Chapter 19.12 of the County Code, titled Tree Preservation and Protection, defines native oak trees as valley oak (*Quercus lobata*), interior live oak (*Quercus wislizenii*), blue oak (*Quercus douglasii*), or oracle oak (*Quercus morehus*) and states that "it shall be the policy of the County to preserve all trees possible through its development review process." It should be noted that to be considered a tree, as opposed to a seedling or sapling, the tree must have a diameter at breast height (dbh) of at least 6 inches or, if it has multiple trunks of less than 6 inches each, a combined dbh of 10 inches. The Sacramento County General Plan Conservation Element (Conservation Element) policies CO-138 and CO-139 also provide protections for native trees:

> CO-138. Protect and preserve non-oak native trees along riparian areas if used by Swainson's hawk, as well as landmark and native oak trees measuring a minimum of 6 inches in diameter or 10 inches aggregate for multi-trunk trees at 4.5 feet above ground.
>
> CO-139. Native trees other than oaks, which cannot be protected through development, shall be replaced with in-kind species in accordance with the

established tree planting specifications, the combined diameter of which shall equal the combined diameter of the trees removed.

Native trees other than oaks include California sycamore (*Plantanus racemosa*), Northern California black walnut (*Juglans hindsii*), Oregon ash (*Fraxinus latifolia*), gray pine (*Pinus sabiniana*), California white alder (*Alnus rhombifolia*), California buckeye (*Aesculus californica*), narrow leaf willow (*Salix exigua*), Gooding's willow (*Salix gooddingii*), red willow (*Salix laevigata*), arroyo willow (*Salix lasiolepis*), shining willow (*Salix lucida*), Pacific willow (*Salix lasiandra*), and dusky willow (*Salix melanopsis*).

The Sacramento County General Plan Conservation Element contains several policies aimed at preserving tree canopy within the County. These are:

> CO-145. Removal of non-native tree canopy for development shall be mitigated by creation of new tree canopy equivalent to the acreage of non-native tree canopy removed. New tree canopy acreage shall be calculated using the 15-year shade cover values for tree species.
>
> CO-146. If new tree canopy cannot be created onsite to mitigate for the non-native tree canopy removed for new development, project proponents (including public agencies) shall contribute to the Greenprint Program funding in an amount proportional to the tree canopy of the specific project.

The 15-year shade cover values for tree species referenced in policy CO-145 are also referenced by the Sacramento County Zoning Code, Chapter 30, Article 4, and the list is maintained by the Sacramento County Department of Transportation, Landscape Planning and Design Division. Policy CO-146 references the Greenprint program, which is run by the Sacramento Tree Foundation and has a goal of planting five million trees in the Sacramento region. The contributions shall be equivalent to the square footage of the tree canopies removed.

PROJECT SPECIFIC ISSUES

The majority of the vegetation at the NARS facility includes ornamental landscape trees, non-native volunteer trees and shrubs along the property boundaries. However, there are also a few native trees located along the north side of the existing detention basin and along the southern property line.

The trees along the northern side of the detention basin are a mix of native and non-native trees including some willow and cottonwood trees. Along the southern property line, there are very few trees and the majority of the vegetation in the project area is landscape and volunteer shrubbery with a few volunteer trees.

The trees along the north side of the existing detention basin are not expected to be removed as a result of the proposed project. The types of trees at this location are often found near the margins of wetted areas but can also are found in non-wetted areas. The project is not expected to substantially alter the environment these trees are accustomed to or result in secondary impacts to trees in this area.

Although the trees along the north side of the detention basin are not expected to be affected by the proposed project, shrubs and trees along the southern property line will be removed to allow for project related construction activities.

These willows are relatively short, multi-stemmed shrubs that do not provide the visual, energy or shade cooling benefits inherent of trees and do not provide the aesthetic and environmental benefits of which the Terrestrial Resources Section of the General Plan is intended to support. Therefore, although native to Sacramento County, the willows along the southern portion of the property that are to be removed as a result of this project are not discussed further in this document and do not require mitigation for their loss.

Along Roseville Road near the northern western boundary of the project site, there are a large number of oleander plants. In addition, there is sycamore tree located within the oleanders to the east of Roseville Road.

NATIVE TREE IMPACTS

ONSITE PROTECTED NATIVE TREES TO BE REMOVED

Construction of the right-turn only driveway will remove one sycamore tree. The sycamore tree has an approximately 8-inch trunk.

County Policy requires replacement of native trees removed by planting in-kind native trees equivalent to the dbh inches lost. Mitigation is recommended to compensate for the removal of the native sycamore tree. Project impacts associated with the removal of protected native trees are considered ***less than significant***.

NON-NATIVE TREE IMPACTS

NON-NATIVE TREES TO BE REMOVED

In 2012, DWMR removed non-native tree canopy as part of the Natural Storm Water Control Project. Environmental Mitigation Measure B was instituted for this project. This measure was subsequently carried over to the mitigation measures for the NARS Sedimentation Basin Mechanical Systems Project. However, the mitigation measure has not fully been carried out, since the project is an update to the existing Master Plan of an existing facility, for monitoring efficiency, the approximately 606 square feet of canopy required to fulfill the previous measure is recommended to be added to the mitigation requirements of the current project.

DWMR will plant tree(s) to replace the previously unmitigated tree canopy. After the Packer Building is constructed, DWMR will plant sufficient tree(s) to satisfy the 2012 NARS Natural Storm Water Control and the Sedimentation Basin Mechanical Systems Projects Environmental Mitigation Measure B as specified by the Office of Planning and Environmental Review.

Construction of the Packer building will require the Eucalyptus trees near the vehicle maintenance facility to be removed. The canopy size of the Eucalyptus trees to be

removed is approximately 3,137 square feet. According to Sacramento County General Plan Policy, the loss of tree canopy must be replaced.

Therefore, the overall canopy that will be needed to be replaced is approximately the 606 square feet for the previous canopy and the 3,137 square feet of the current trees removed or 3,743 square feet.

As County Policy requires that impacts to tree canopy be addressed by replacement or contribution to the Greenprint Program project, mitigation is recommended to compensate for the loss of non-native tree canopy. Impacts are considered ***less than significant***.

CULTURAL RESOURCES

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

- Cause a substantial adverse change in the significance of a historical resource
- Have a substantial adverse effect on an archaeological resource
- Disturb any human remains, including those interred outside of formal cemeteries

Under CEQA, lead agencies must consider the effects of projects on historical resources and archaeological resources. A "historical resource" is defined as a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources (CRHR), a resource included in a local register of historical resources, and any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant (Section 15064.5[a] of the Guidelines). Public Resources Code (PRC) Section 5042.1 requires that any properties that can be expected to be directly or indirectly affected by a proposed project be evaluated for CRHR eligibility. Impacts to historical resources that materially impair those characteristics that convey its historical significance and justify its inclusion or eligibility for the NRHP or CRHR are considered a significant effect on the environment (CEQA guidelines 15064.5)).

In addition to historically significant resources, an archeological site may meet the definition of a "unique archeological resource" as defined in PRC Section 21083.2(g). If unique archaeological resources cannot be preserved in place or left in an undisturbed state, mitigation measures shall be required (PRC Section 21083.2 (c)).

CEQA Guidelines Section 15064.5 (e) outlines the steps the lead agency shall take in the event of an accidental discovery of human remains in any location other than a dedicated cemetery.

Cultural Setting

A search of records and historical information on file at the North Central Information Center (NCIC) of the California Historical Resources Information System (CHRIS) was conducted April 13, 2020 for the project area and a one-quarter-mile buffer.

The records search identified zero previously recorded resources within the project site.

Project Impacts

The project is unlikely to impact human remains buried outside of formal cemeteries; however, if human remains are encountered during construction, mitigation is included specifying how to comply with CEQA Guidelines Section 15064.5 (e), Sections 5097.97 and 5097.98 of the State Public Resources Code, and Section 7050.5 of the State Health and Safety Code. Therefore, project impacts to cultural resources will be ***less than significant***.

Tribal Cultural Resources

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

- Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with a cultural value to a California Native American tribe, that is:

  Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

  A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Under PRC Section 21084.3, public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. California Native American tribes traditionally and culturally affiliated with a geographic area may have expertise concerning their tribal cultural resources (21080.3.1(a)).

Tribal Cultural Resource Setting

In accordance with Assembly Bill (AB) 52, codified as Section 21080.3.1 of CEQA, formal notification letters were sent to those tribes who had previously requested to be notified of Sacramento County projects on May 8, 2020. The County received responses from Wilton Rancheria and United Auburn Indian Community. Wilton

Rancheria had no concerns with the project and closed consultation. The Untied Auburn Indian Community requested that the project address potential Unanticipated Discoveries and include mitigation. With the implementation of the mitigation measure the United Auburn Indian Community closed consultation.

DISCUSSION OF PROJECT IMPACTS – TRIBAL CULTURAL RESOURCES

Through consultation under CEQA, tribes confirmed that the project area does not contain tribal cultural resources of significance. The tribes and lead agency mutually agreed that mitigation measure addressing unanticipated discoveries was appropriate and feasible for the project. Project impacts to tribal 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
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school
- 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
- Impair implementation of or physically interfere with an adopted emergency response or emergency evacuation plan

HAZARDOUS WASTE SCREENING.

In addition to accepting household waste from the public, businesses, and private waste haulers, NARS accepts household hazardous waste. NARS utilizes several methods to prevent hazardous waste from entering the site's waste stream. NARS operates a HHW facility permitted to receive hazardous waste from the public, businesses, and private waste haulers. NARS operates the HHW facility before the scales onsite so customers have the opportunity to deposit hazardous waste before engaging with the site's waste operations. NARS additionally also has signage near the site entrance advising customers what material is acceptable for the recovery station and what should be taken to the HHW.

Additionally to prevent hazardous waste from entering NARS, scale attendants near the site entrance ask non-commercial customers questions about the loads they are bringing onsite including if they are brining any hazardous materials or liquids. The scale attendants request customers to leave any household hazardous waste they bring with them at the HHW facility.

NARS also operates a load check program whereby site staff randomly inspect customer's loads to make sure there are no hazardous materials in the waste. Additionally once a customer deposits refuse onsite, NARS staff will visually scan the garbage before moving the refuse for transfer offsite. If staff observe any hazardous waste, they transport the material to the HHW facility for proper disposal.

Hazardous waste specialists from the HHW facility annually train NARS staff regarding the Sacramento County Department of Waste Management and Recycling's Solid Waste Acceptance Policy. The Solid Waste Acceptance Policy describes what refuse the transfer station accepts and what materials require disposal as hazardous waste. NARS staff will contact hazardous waste specialists at the HHW facility if they have any questions about any potentially hazardous materials.

HHW collected at NARS is loaded onto the contracted vendor trailer and transferred to their various processing facilities. The hazardous waste transporters must comply with the California Vehicle Code, CHP Regulations (CA Code Regulations, title 13); the California State Fire Marshal Regulations (CA Code Regulations, title 19); United States Department of Transportation (DOT) regulations, Title 49, Code of Federal Regulations (49 Code of Federal Regulations); and U.S. Environmental Protection Agency (U.S. EPA) Regulations, Title 40 Code of Federal Regulations. In addition, hazardous waste transporters must comply with the Health & Safety Code and CA Code Regulations, title 22 which are administered by DTSC.

As such the impacts from the collection and transportation of hazardous materials would be ***less than significant***.

Former McClellan Air Force Base

The project site was previously utilized by the United States Air Force to support operations at the former McClellan Air Force Base. The Air Force previously conducted industrial activities on the site and utilized subject property as a jet fuel storage tank farm. Based on prior investigation activities on the property, the California Department of Toxic Substances Control and the California Regional Water Quality Control Board, Central Valley Region (RWQCB) has found that a likelihood exists for unidentified contamination to be present on the property.

Because of the possible presence of unidentified hazardous materials on the site related to past operations, the DTSC has determined that site restrictions should be in place to regulate future land uses on the property in order to protect human health or safety and waters of the State. A covenant to restrict use on the property between the County and the DTSC has been made that restricts the land uses on the property in order to minimize potential hazards.

The land use restrictions on the site generally relate to avoiding the introduction of sensitive receptors to the area, not altering groundwater conditions on the site and not limiting the ability for future site investigation activities related to hazardous materials to occur.

The project does not include housing, a hospital for humans, a school for persons under 18, a day care center, disturbing existing groundwater wells, the construction or use of groundwater wells or any use that would restrict future investigation activates. The proposed project is consistent with the covenant that regulates land uses for the project site.

TPH Site

In addition to the hazardous materials related to the past use as a jet fuel storage facility, Total Petroleum Hydrocarbons (TPH) in the form of diesel contamination exists within a portion of the subject property. The TPH is related to a County-owned diesel fuel underground storage tank (UST) which was located at the southeastern portion of the property and was removed. After removal of the UST, residual TPH contamination remained in the soil at concentrations exceeding DTSC screening levels for the protection of human health for direct exposure.

As a result, the Sacramento County Environmental Management Department, pursuant to its role as the local enforcement agency for the underground tank program, prepared a health risk assessment for the site. The assessment concluded that the residual TPH concentrations, where they currently exist four feet underground, are not a threat to human health or the environment. However, it was determined that land use restrictions for the TPH site are necessary to address the management of the contaminated soils.

The land use restrictions included in the agreement between Sacramento County and the DTSC applicable to the TPH site include the following;

> No activities that will disturb the soil (e.g., digging, excavation, grading, removal, trenching, filling, earth movement or mining), shall be allowed at the TPH site without a prior written plan approved by the State.
>
> Any contaminated soils brought to the surface by digging, grading, excavation or trenching shall be managed in accordance with all applicable provisions and State and Federal law.
>
> The Owner or Occupant shall provide the U.S. EPA and the State written notice at least fourteen (14) days to any building, digging, filling, grading, mining or excavating in the property.

Although the proposed project does propose the excavation of soils, the project area is not located at the TPH site. The project is not expected to encounter or expose sensitive receptors to contamination related to the TPH site.

Toxics and Hazardous Materials Conclusion

NARS is a permitted Hazardous Waste Facility. NARS has an established household hazardous waste screening program that includes the appropriate transfer protocol that reduces the risk to human safety and the environment. The permit provisions ensure that impacts associated with the acceptance and transfer of hazardous waste is **less than significant.**

The NARS site has the potential to contain unidentified contamination and is known to contain TPH, which has the potential to cause harm to human health and safety if disturbed and handled in an unsafe manner. However, the site has been monitored by the DTSC and Sacramento County to assess and minimize potential impacts of contamination, and a covenant to restrict use on the property has been developed to ensure that hazardous materials impacts are minimized. According to the covenant, the Department of Toxic Substances Control Board has concluded that project site, subject to the restrictions of the covenant, does not pose a present or unacceptable threat to human safety and the environment.

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?

Greenhouse Gas Background

For the NARS project the prominent Greenhouse Gases contributing to the greenhouse effect are carbon dioxide (CO_2) and methane (CH_4), which are described below. Human-caused emissions of these GHGs in excess of natural ambient concentrations are responsible for intensifying the greenhouse effect and have led to a trend of unnatural warming of Earth's climate that is known as global climate change or global warming.

Carbon Dioxide

Carbon dioxide (CO_2) emissions are mainly associated with combustion of carbon-bearing fossil fuels such as gasoline, diesel, and natural gas used in mobile sources and energy-generation-related activities. The U.S. Environmental Protection Agency (EPA) estimates that CO_2 emissions accounted for 76 percent of greenhouse gas emissions in the United States in 2014. The California Energy Commission (CEC) estimates that CO_2 emissions associated with fossil fuel combustion account for 84.3 percent of California's anthropogenic (manmade) greenhouse gas emissions and the total CO_2 emissions in the United States have increased by 9 percent from 1990 to 2014. For the NARS project these emissions would be associated with vehicles such as commercial haulers, self-haulers, transfer trucks and any waste handling equipment.

METHANE

Methane (CH_4) has both natural and anthropogenic sources. Landfills, natural gas distribution systems, agricultural activities, fireplaces and wood stoves, stationary and mobile fuel combustion, and gas and oil production fields categories are the major sources of these emissions. At NARS methane would be from solid waste and any organic waste held at the project site. The EPA estimates that CH_4 emissions accounted for 7.9 percent of total greenhouse gas emissions in the United States in 2004. The CEC estimates that CH_4 emissions from various sources represent 9.0 percent of California's total greenhouse gas emissions and the total CH_4 emissions in the United States has decreased by 5.6 percent from 1990 to 2014.

Sacramento Metropolitan Air Quality Management District (SMAQMD) has adopted Greenhouse Gas thresholds, to provide a uniform scale to measure the significance of GHG emissions from land use and stationary source projects in compliance with CEQA and Assembly Bill (AB) 32 in 2013. SMAQMD's goals in developing GHG thresholds include ease of implementation; use of standard analysis tools; and emissions mitigation consistent with AB 32.

SMAQMD utilized guidance from the California Air Pollution Control Officers Association to develop threshold concepts. The goal was to develop a threshold screening level that would capture 90 percent of emissions for new stationary sources and land development projects.

Sacramento Metropolitan Air Quality Management District (SMAQMD) Greenhouse Gas thresholds of significance are separated into two project types (Table IS-9). The first is the Land Development and Construction project type and the second project type is Stationary Source Only. Both of these project types are further subdivided into the construction phase and the operational phase. The adopted threshold for stationary sources projects in the operational phase is 10,000 metric tons of CO2e per year while the construction phase threshold is 1,100 MT of CO2e per year. Furthermore, the land development thresholds for both the construction and operational phase are 1,100 MT CO2e per year.

Table IS-8: Sacramento Metropolitan Air Quality Management District Threshold of Significance for Greenhouse Gases

Land Development and Construction Projects		
	Construction Phase	Operational Phase
Greenhouse Gas as CO_2e	1,100 metric tons per year	1,100 metric tons per year
Stationary Source Only		
	Construction Phase	Operational Phase
Greenhouse Gas as CO_2e	1,100 metric tons per year	10,000 metric tons per year

During construction of the Master Plan improvements 353 metric tons of CO_2e per year would be generated. Construction GHG emissions would be ***less than significant***.

The first step in the current Greenhouse Gas methodology of Sacramento County is to determine if a project screens out. This is accomplished by comparing the project with the Sacramento Metropolitan Air Quality Management District (SMAQMD) Greenhouse Gas Operations Screen Levels table. For example, if the project is a single family residential project with fewer than 57 dwelling units it will screen out and no additional analysis is required. For waste facility projects there is no Land Use Category that equates. The proposed new Administration Building, Shed Expansion and Packer Buildings are identified as Government Office Building, and Light Industrial Uses.

If the project does not initially screen out, then the planner will run the project information through the California Emissions Estimator Model (CalEEMod). The threshold for most projects is 1,100 metric tons of CO2e per year. If the CalEEMod run for a land development project shows less than 1,100 metric tons per year, the project will again screen out and no additional analysis is required. If the project has not screened out using either of the above two methods then the project will be analyzed further. The complete CalEEMod results are than analyzed to discover what activities associated with project implementation cause the GHG impacts so mitigation measures can be crafted that lessen the impacts associated with GHG emissions.

The established thresholds do not apply well to waste facilities operations because expressing the threshold as a function of building square footage is not proportionate to the facility's Greenhouse Gas impacts, which are a function of haul truck traffic, off-road equipment, worker commutes, commercial and self-haulers, on-site processing and energy usage. In consultation with SMAQMD, it was determined that the threshold for stationary source projects would be the most appropriate. Therefore, the operational threshold for the project would be 10,000 metric tons of CO_2e per year.

CalEEMod was used to model the annual Greenhouse Gas emissions as CO_2 equivalent (CO_2e). The model run used the same land use designations as in the Air Quality section and emissions as metric tons per year of CO_2e are shown in the Annual Report (Appendix A). The use of CO_2e would model the various GHG gases including potential methane emissions which would be generated by the collected organic waste.

The CalEEMod model found that the operational phase of the facility would generate 1,668.7 metric tons of CO_2e per year. This would not exceed the operational phase threshold of 10,000 metric tons per year. Therefore, the impacts from GHG emissions are considered ***less than significant***.

ENVIRONMENTAL MITIGATION MEASURES

MITIGATION MEASURE A: NATIVE TREE REMOVAL

The removal of 8 inches dbh of tree shall be compensated for by planting in-kind native California sycamore tree equivalent to the dbh inches lost, based on the ratios listed below, at locations that are authorized by the Environmental Coordinator.

A total of 8 inches will require compensation.

Equivalent compensation based on the following ratio is required:

- one preserved native tree < 6 inches dbh on-site = 1 inch dbh
- one D-pot seedling (40 cubic inches or larger) = 1 inch dbh
- one 15-gallon tree = 1 inch dbh
- one 24-inch box tree = 2 inches dbh
- one 36-inch box tree = 3 inches dbh

Prior to the approval of Improvement Plans, a Replacement Tree Planting Plan shall be prepared by a certified arborist or licensed landscape architect and shall be submitted to the Environmental Coordinator for approval. The Replacement Tree Planting Plan(s) shall include the following minimum elements:

1. Species, size and locations of all replacement plantings and < 6-inch dbh trees to be preserved
2. Method of irrigation
3. If planting in soils with a hardpan/duripan or claypan layer, include the Sacramento County Standard Tree Planting Detail L-1, including the 10-foot deep boring hole to provide for adequate drainage
4. Planting, irrigation, and maintenance schedules;
5. Identification of the maintenance entity and a written agreement with that entity to provide care and irrigation of the trees for a 3-year establishment period, and to replace any of the replacement trees which do not survive during that period.
6. Designation of 20-foot root zone radius and landscaping to occur within the radius of trees < 6 inches dbh to be preserved on-site.

No replacement tree shall be planted within 15 feet of the driplines of existing native trees or landmark size trees that are retained on-site, or within 15 feet of a building foundation or swimming pool excavation. The minimum spacing for replacement native

trees shall be 20 feet on-center. Examples of acceptable planting locations are publicly owned lands, common areas, and landscaped frontages (with adequate spacing). Generally unacceptable locations are utility easements (PUE, sewer, storm drains), under overhead utility lines, private yards of single family lots (including front yards), and roadway medians.

Native trees <6 inches dbh to be retained on-site shall have at least a 20-foot radius suitable root zone. The suitable root zone shall not have impermeable surfaces, turf/lawn, dense plantings, soil compaction, drainage conditions that create ponding (in the case of oak trees), utility easements, or other overstory tree(s) within 20 feet of the tree to be preserved. Trees to be retained shall be determined to be healthy and structurally sound for future growth, by an ISA Certified Arborist subject to Environmental Coordinator approval.

If tree replacement plantings are demonstrated to the satisfaction of the Environmental Coordinator to be infeasible for any or all trees removed, then compensation shall be through payment into the County Tree Preservation Fund. Payment shall be made at a rate of $325.00 per dbh inch removed but not otherwise compensated, or at the prevailing rate at the time payment into the fund is made.

MITIGATION MEASURE B: NON-NATIVE CANOPY COMPENSATION

Removal of 3,742.9 square feet of non-native tree canopy for development shall be mitigated by creation of new tree canopy equivalent to the acreage of non-native tree canopy removed. New tree canopy acreage shall be calculated using the Sacramento County Department of Transportation 15-year shade cover values for tree species. Preference is given to on-site mitigation, but if this is infeasible, then funding shall be contributed to the Sacramento Tree Foundation's Greenprint Program in an amount proportional to the tree canopy lost.

MITIGATION MEASURE COMPLIANCE

Comply with the Mitigation Monitoring and Reporting Program for this project, including the payment of 100% of the Office of Planning and Environmental Review staff costs, and the costs of any technical consultant services incurred during implementation of that Program.

INITIAL STUDY CHECKLIST

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

1 Potentially Significant indicates there is substantial evidence that an effect MAY be significant. If there are one or more "Potentially Significant" entries an Environmental Impact Report (EIR) is required. Further research of a potentially significant impact may reveal that the impact is actually less than significant or less than significant with mitigation.

2 Less than Significant with Mitigation applies where an impact could be significant but specific mitigation has been identified that reduces the impact to a less than significant level.

3 Less than Significant or No Impact indicates that either a project will have an impact but the impact is considered minor or that a project does not impact the particular resource.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
1. **LAND USE** - Would the project:					
a. Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			X		The project is consistent with environmental policies of the Sacramento County General Plan, North Highlands / Foothill Farms Community Plan, Sacramento County Zoning Code and the McClellan Airport Comprehensive Land Use Plan.
b. Physically disrupt or divide an established community?				X	The project will not create physical barriers that substantially limit movement within or through the community.
2. **POPULATION/HOUSING -** Would the project:					
a. Induce substantial unplanned population growth in an area either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of infrastructure)?			X		The proposed infrastructure project is intended to service existing or planned development and will not induce substantial unplanned population growth.
b. Displace substantial amounts of existing people or housing, necessitating the construction of replacement housing elsewhere?				X	The project will not result in the removal of existing housing, and thus will not displace substantial amounts of existing housing.
3. **AGRICULTURAL RESOURCES** - Would the project:					
a. Convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance or areas containing prime soils to uses not conducive to agricultural production?				X	The project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on the current Sacramento County Important Farmland Map published by the California Department of Conservation. The site does not contain prime soils.
b. Conflict with any existing Williamson Act contract?				X	No Williamson Act contracts apply to the project site.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
c. Introduce incompatible uses in the vicinity of existing agricultural uses?				X	The project does not occur in an area of agricultural production.
4. **AESTHETICS -** Would the project:					
a. Substantially alter existing viewsheds such as scenic highways, corridors or vistas?			X		The project does not occur in the vicinity of any scenic highways, corridors, or vistas.
b. In non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings?			X		The project is not located in a non-urbanized area.
c. If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X		Construction will not substantially degrade the visual character or quality of the project site.
d. Create a new source of substantial light, glare, or shadow that would result in safety hazards or adversely affect day or nighttime views in the area?			X		The project will not result in a new source of substantial light, glare or shadow that would result in safety hazards or adversely affect day or nighttime views in the area.
5. **AIRPORTS -** Would the project:					
a. Result in a safety hazard for people residing or working in the vicinity of an airport/airstrip?			X		The project is located within the safety zone of Sacramento McClellan Airport. Refer to the Airports discussion in the Environmental Effects section above.
b. Expose people residing or working in the project area to aircraft noise levels in excess of applicable standards?			X		The project is located in the vicinity of Sacramento McClellan Airport and is within the 60 CNEL noise contour. Refer to the Airports discussion in the Environmental Effects section above.
c. Result in a substantial adverse effect upon the safe and efficient use of navigable airspace by aircraft?			X		The project is located in the vicinity of Sacramento McClellan Airport. Refer to the Airports discussion in the Environmental Effects section above..

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

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
f. Result in substantial adverse physical impacts associated with the provision of electric or natural gas service?			X		Minor extension of utility lines would be necessary to serve the proposed project. Existing utility lines are located along existing roadways and other developed areas, and the extension of lines would take place within areas already proposed for development as part of the project. No significant new impacts would result from utility extension.
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.
7. **TRANSPORTATION** - Would the project:					
a. Conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) – measuring transportation impacts individually or cumulatively, using a vehicles miles traveled standard established by the County?			X		The proposed project is considered a Local Serving Public Facility/Service and meets the criteria to screen out the project as generating significant impacts. Refer to the Transportation/Traffic discussion in the Environmental Effects section above.
b. Result in a substantial adverse impact to access and/or circulation?			X		The project will be required to comply with applicable access and circulation requirements of the County Improvement Standards and the Uniform Fire Code. Upon compliance, impacts are less than significant.
c. Result in a substantial adverse impact to public safety on area roadways?			X		The project will be required to comply with applicable access and circulation requirements of the County Improvement Standards and the Uniform Fire Code. Upon compliance, impacts are less than significant.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
d. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?			X		The project does not conflict with alternative transportation policies of the Sacramento County General Plan, with the Sacramento Regional Transit Master Plan, or other adopted policies, plans or programs supporting alternative transportation.
8. **AIR QUALITY** - Would the project:					
a. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?			X		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; the project will not result in emissions that exceed standards.
b. Expose sensitive receptors to pollutant concentrations in excess of standards?			X		See Response 8.a.
c. Create objectionable odors affecting a substantial number of people?			X		The project could result in occasional or periodic odors. Refer to the Initial Study. Refer to the Odors discussion in the Environmental Effects section above.
9. **NOISE -** Would the project:					
a. Result in generation of a temporary or permanent increase in ambient noise levels in the vicinity of the project 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.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
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).
c. Generate excessive groundborne vibration or groundborne noise levels.			X		The project will not involve the use of pile driving or other methods that would produce excessive groundborne vibration or noise levels at the property boundary.
10. **HYDROLOGY AND WATER QUALITY** - Would the project:					
a. Substantially deplete groundwater supplies or substantially interfere with groundwater recharge?			X		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.
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 within Flood Zone X-500 as mapped on a federal Flood Insurance Rate Map; however, it is located in a flood hazard area. Refer to the Hydrology discussion in the Environmental Effects section above
d. Place structures that would impede or redirect flood flows within a 100-year floodplain?			X		See Response 10c.
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. Refer to the Hydrology discussion in the Environmental Effects section above

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g. Create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems?			X		Adequate on- and/or off-site drainage improvements will be required pursuant to the Sacramento County Floodplain Management Ordinance and Improvement Standards.
h. Create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality?			X		Compliance with the State Water Board issued NPDES General Permit for Industrial Storm Water Discharges, Excluding Construction Activities, Water Quality Order 2014-0057-DWQ will ensure that the project will not create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality.
11. **GEOLOGY AND SOILS** - Would the project:					
a. Directly or indirectly cause potential substantial adverse effects, including 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		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.
b. Result in substantial soil erosion, siltation or loss of topsoil?			X		Compliance with the State Water Board issued NPDES General Permit for Industrial Storm Water Discharges, Excluding Construction Activities, Water Quality Order 2014-0057-DWQ 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.

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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 or unique geologic feature?			X		No known paleontological resources (e.g. fossil remains) or sites occur at the project location.
12. **BIOLOGICAL RESOURCES** - Would the project:					
a. Have a substantial adverse effect on any special status species, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, or threaten to eliminate a plant or animal community?			X		No special status species are known to exist on or utilize the project site, nor would the project substantially reduce wildlife habitat or species populations.
b. Have a substantial adverse effect on riparian habitat or other sensitive natural communities?			X		No sensitive natural communities occur on the project site, nor is the project expected to affect natural communities off-site.
c. Have a substantial adverse effect on streams, wetlands, or other surface waters that are protected by federal, state, or local regulations and policies?			X		No protected surface waters are located on or adjacent to the project site.
d. Have a substantial adverse effect on the movement of any native resident or migratory fish or wildlife species?			X		The project site is already developed. Project implementation would not affect native resident or migratory species.

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e. Adversely affect or result in the removal of native or landmark trees?			X		Native and/or landmark trees occur on the project site and/or may be affected by on and/or off-site construction. Mitigation is included to ensure impacts are less than significant. Refer to the Biological Resources discussion in the Environmental Effects section above.
f. Conflict with any local policies or ordinances protecting biological resources?			X		The project is consistent with local policies/ordinances protecting biological resources.
g. Conflict with the provisions of an adopted Habitat Conservation Plan or other approved local, regional, state or federal plan for the conservation of habitat?			X		There are no known conflicts with any approved plan for the conservation of habitat.
13. **CULTURAL RESOURCES -** Would the project:					
a. Cause a substantial adverse change in the significance of a historical resource?			X		No historical resources would be affected by the proposed project.
b. Have a substantial adverse effect on an archaeological resource?			X		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		No known human remains exist on the project site. Nonetheless, mitigation has been recommended to ensure appropriate treatment should remains be uncovered during project implementation.
d. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074?			X		Notification pursuant to Public Resources Code 21080.3.1(b) was provided to the tribes and request for consultation was received. -Refer to the Tribal Cultural Resources discussion in the Environmental Effects section above.

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14. **HAZARDS AND HAZARDOUS MATERIALS** - Would the project:					
a. Create a substantial hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X		The project involves the transport, use, and/or disposal of hazardous material; however, compliance with local, state and Federal standards regarding the transportation of hazardous materials ensures the impacts are less than significant
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 and transportation of hazardous materials on/from the site. However, compliance with local, state and federal standards regarding the storage and transportation will provide adequate protection from upset conditions.
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?			X		The project site is not located within ¼ mile of an existing /proposed school.
d. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, resulting in a substantial hazard to the public or the environment?		X			The project is located on a known hazardous materials site. Refer to the Hazards and Hazardous Materials discussion in the Environmental Effects section above.
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.

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15. ENERGY – Would the project:					
a. Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction?			X		While the project will introduce 3 buildings and increase energy consumption, compliance with Title 24, Green Building Code, will ensure that all project energy efficiency requirements are net resulting in less than significant impacts.
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X		The project will comply with Title 24, Green Building Code, for all project efficiency requirements.
16. GREENHOUSE GAS EMISSIONS – Would the project:					
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X		The California Emissions Estimator Model (CalEEMod) was used to estimate the greenhouse gas emissions associated with the project. Based on the results, the established County threshold of 10,000 annual metric tons of CO2e for the, commercial/industrial energy and/or transportation sector of the proposed project will not be exceeded. Refer to the Greenhouse Gas Emissions discussion in the Environmental Effects section above.
b. Conflict with an applicable plan, policy or regulation for the purpose of reducing the emission of greenhouse gases?			X		The project is consistent with County policies adopted for the purpose or reducing the emission of greenhouse gases.

SUPPLEMENTAL INFORMATION

LAND USE CONSISTENCY	Current Land Use Designation	Consistent	Not Consistent	Comments
General Plan	M-1 (Light Industrial)	X		
Community Plan (North Highlands)	M-1 (Light Industrial)	X		
Land Use Zone	TOD	X		

INITIAL STUDY PREPARERS

Environmental Coordinator: Tim Hawkins

Section Manager: Marianne Biner

Project Leader: Kurtis Steinert

Initial Review: Marianne Biner

Office Manager: Belinda Wekesa-Batts

Administrative Support: Justin Maulit