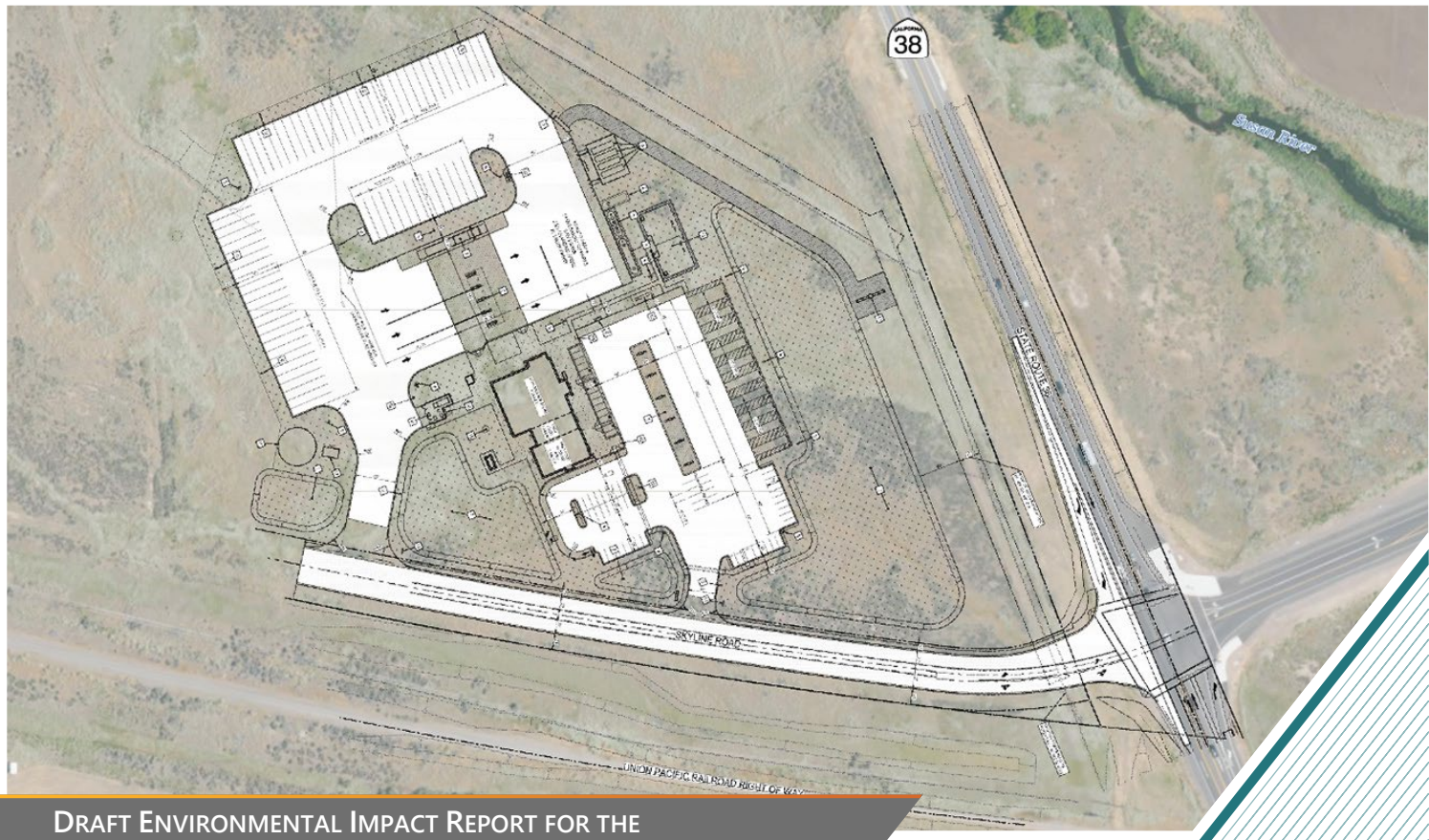


DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE

Susanville Travel Stop Project

Prepared for:

City of Susanville

December 2025

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Susanville Travel Stop Project

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LIST OF ABBREVIATIONS

°C	Celsius
2017 Scoping Plan	*California's 2017 Climate Change Scoping Plan*
2022 Scoping Plan	2022 Scoping Plan for Achieving Carbon Neutrality
A/C	air conditioning
AB	Assembly Bill
ACC II	Advanced Clean Cars II
ACC	Advanced Clean Cars
ACF	Advanced Clean Fleet
ACT	Advanced Clean Trucks
ADA	Americans with Disabilities Act
af	acre-feet
AFY	acre-feet per year
APN	Assessor's Parcel Number
Area Plan	Susanville Vicinity Area Plan and Environmental Impact Report
BAAQMD	Bay Area Air Quality Management District
BACT	best available control technology
BMP	best management practices
BP	before present
BPC	Business and Professions Code
BSM	bioretention soil media
BUG	Backlight-Uplight-Glare
C&D	construction and demolition
C-2	General Commercial Shopping District
CA MUTCD	California Manual on Uniform Traffic Control Devices
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy
CalEEMod	California Emissions Estimator Model
CALGreen	Green Building Standards Code
Cal-IPC	California Invasive Plant Council
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation

CAP	climate action plans
CAP	criteria air pollutants
CARB	California Air Resources Board
CBC	California Building Code
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFR	Code of Federal Regulations
City	City of Susanville
CIWMA	California Integrated Waste Management Act
CMTP	Construction Management and Traffic Plan
CMTP	construction traffic management plan
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNG	compressed natural gas
CNPS	California Native Plant Society
CO	carbon monoxide
CO_2	achieve carbon dioxide
county	Lassen County
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CRPR	California Rare Plant Rank
CUWCC	California Urban Water Conservation Council's
CWA	Clean Water Act
CWHR	California Wildlife Habitat Relationship
dB	decibels
diesel PM	diesel engines
District	Susanville Consolidated Sanitary District
DOT	US Department of Transportation
Draft EIR	draft environmental impact report
DWR	California Department of Water Resources

EAP	Energy Action Plan
east of Susanville	US 395
EGU	electric generating units
EO	Executive Order
EPA	US Environmental Protection Agency
EPAct	Energy Policy Act of 1992
EPCA	Energy Policy and Conservation Act of 1975
ESA	Endangered Species Act
EV	electric vehicle
FHWA	Federal Highway Administration
FICON	Federal Interagency Committee on Noise
FMCSA	Federal Motor Carrier Safety Administration
FTA	Federal Transit Administration
GHG	greenhouse gas
gpcd	Gross Per Capita per Day
GSA	groundwater sustainability agencies
Guidance	Safety Review Practitioners Guidance
HAP	pollutants
HRI	heat rate improvement
HVAC	heating, ventilation and air conditioning
Hz	hertz
IEPR	Integrated Energy Policy Report
IESNA	Illuminating Engineering Society of North America
in/sec	inches per second
IPaC	Information for Planning and Consultation
IS	Initial Study
ITE	Institute of Transportation Engineers
KPRA	Kingpin to Rear Axle
LAFCO	Lassen County Local Agency Formation Commission
LAFCO	Local Agency Formation Commission
LCAPCD	Lassen County Air Pollution Control District
LCFS	Low Carbon Fuel Standard
LCI	Office of Land Use and Climate Innovation's
LCTC	Lassen County Transportation Commission
LDR	Local Development Review

LED	light-emitting diode
LMOP	Landfill Methane Outreach Program
LMUD	Lassen Municipal Utility District
LOS	level of service
LRSP	Lassen County Local Roadway Safety Plan
LRWQCB	Lahontan Regional Water Quality Control Board
LSAA	Lake and Streambed Alteration Agreement
LTSA	Lassen Transit Service Agency
MACT	maximum available control technology
MBTA	Migratory Bird Treaty Act
MG	millions of gallons
mgd	million gallons per day
M-L	Limited Industrial District
MMBtu	metric million British thermal units per year
$MMTCO_2e$	metric tons of carbon dioxide equivalent
mPa	micro-Pascals
MPO	metropolitan planning organizations
msl	mean sea level
MWELO	Model Water Efficient Landscape Ordinance
MWh	megawatt hours
NAAQS	national ambient air quality standards
NAGPRA	Native American Graves Protection and Repatriation Act
NAHC	California Native American Heritage Commission
NEIC	Northeast Information Center
NEPAB	Northeast Plateau Air Basin
NHPA	National Historic Preservation Act
NHTSA	National Highway Traffic Safety Administration
NO	nitric oxide
NO_2	nitrogen dioxide
NOP	Notice of Preparation
NO_X	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NPPA	California Native Plant Protection Act
NRHP	National Register of Historic Places
On-Site	Canopy Signs

OPR	Governor's Office of Planning and Research
PDF	Project Design Features
PM	particulate matter
PM_{10}	10 micrometers or less
$PM_{2.5}$	2.5 micrometers or less
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
project	Susanville Travel Stop Project
PV	photovoltaic
RHNA	Regional Housing Needs Allocation
RMS	root-mean-square
ROG	reactive organic gases
ROW	right-of-way
RTP	Regional Transportation Plan
RV	recreational vehicle
RWQCB	regional water quality control board
SAF Plan	State Alternative Fuels Plan
SAFE	Safer Affordable Fuel-Efficient
SB	Senate Bill
SCH	State Clearinghouse
SCS	sustainable communities strategies
SF	square foot
SGMA	Sustainable Groundwater Management Act
SIP	State Implementation Plan
SLF	Sacred Land Files
SMAQMD	Sacramento Metropolitan Air Quality Management District's
SO_2	sulfur dioxide
SOV	single occupancy vehicles
SPL	sound pressure level
SR 36	State Route 36
SR	State Route
STAA	Surface Transportation Assistance Act
SVP	Society of Vertebrate Paleontology
SWPPP	Stormwater Pollution Prevention Plan

SWRCB	California, the State Water Resources Control Board
TAC	Toxic air contaminants
TDM	Transportation Demand Management
Technical Advisory	Technical Advisory on Evaluating Transportation Impacts in CEQA
UCMP	University of California Museum of Paleontology
USACE	US Army Corps of Engineers
USDA	US Department of Agriculture
USFWS	US Fish and Wildlife Service
USGS	US Geological Survey
USSC	US Sign Council
UWMP	Urban Water Management Plan
UWMPA	Urban Water Management Planning Act
VMT	Vehicle Miles Traveled
WDR	Waste Discharge Requirements
west of Susanville	SR 44
WRCC	Western Regional Climate Center
WSA	water supply assessment
WWTP	Wastewater Treatment Plant
ZEV	zero-emission vehicle
ZNE	zero net energy

EXECUTIVE SUMMARY

ES.1 INTRODUCTION

This summary is provided in accordance with California Environmental Quality Act Guidelines (State CEQA Guidelines) Section 15123. As stated in Section 15123(a), "an EIR [environmental impact report] shall contain a brief summary of the proposed action and its consequences. The language of the summary should be as clear and simple as reasonably practical." Section 15123(b) states that "[t]he summary shall identify: (1) [e]ach significant effect with proposed mitigation measures and alternatives that would reduce or avoid that effect; (2) [a]reas of controversy known to the Lead Agency including issues raised by agencies and the public; and (3) [i]ssues to be resolved including the choice among alternatives and whether or how to mitigate the significant effects."

As required by the guidelines, this chapter includes (1) a summary description of the Susanville Travel Stop Project, (2) a synopsis of environmental impacts and recommended mitigation measures (Table ES-1), (3) identification of the alternatives that would reduce the effects of the proposed project (Section ES.4 and Table ES-2) and of the environmentally superior alternative, and (4) a discussion of the areas of controversy associated with the project.

ES.2 SUMMARY DESCRIPTION OF THE PROJECT

ES.2.1 Project Location

The project site is located on an approximate 14.15-acre vacant parcel situated to the southeast of the City of Susanville. The project site is located in an area within the unincorporated territory of Lassen County that is proposed for annexation into the City of Susanville. The project site is part of a larger 79.6-acre parcel (Assessor's Parcel Number [APN] 107-280-017), located immediately south of Susanville city limits and west of State Route (SR) 36.

ES.2.2 Background and Need for the Project

The proposed project includes a travel stop, which would provide professional truck drivers and motorists with 24-hour access to purchase gasoline, diesel, propane, electronics, snacks, travel items, and food from two fast-food restaurants, one with a drive-thru. A dog park, recreational vehicle (RV) dump station, bioretention basins, truck, RV and automobile parking areas and landscaping/lighting are also proposed, along with a 10-space overnight RV park. Project visitors/customers would include "over-the-road" trucks (i.e., professional long-haul drivers who are on the road for consecutive days or weeks at a time), traveling motorists, and local residents. Primary access to the project site would be provided from SR 36 via an existing signalized intersection at SR 36 and Skyline Road but with a new dedicated exit lane southbound and a new northbound dedicated turn lane onto Skyline Road. Ingress/egress would be provided via two entry/exit points off Skyline Road, the first for RVs and automobiles and the second for trucks.

Existing and future truck and vehicular traffic is anticipated to generate substantial demand for the proposed travel stop facilities and services as the city lies at the junction of SR 36 and SR 139. SR 36 is an east-west highway that begins at US 101 near the California Coast. Near Susanville, the roadway serves as an important link between Redding and Red Bluff (via SR 36 and SR 44) to the west, Reno/North Lake Tahoe (via US 395) to the east, and SR 139 heads north to the Oregon border as a direct route to Klamath Falls.

ES.2.3 Project Objectives

The following objectives for the project are:

- Create a high-quality travel stop commercial development along SR 36, a designated Surface Transportation Assistance Act (STAA) route.
- Develop a property of sufficient size to create a regional travel stop that would accommodate a truck and auto fuel dispensing area, convenience store, fast-food restaurant, dog park, truck parking and overnight RV parking.
- Construct a travel stop facility near a major highway to minimize truck and automobile movements, Vehicle Miles Traveled (VMT), and associated air pollutant and greenhouse gas emissions and traffic noise on local streets.
- Assist the City of Susanville with meeting its economic development goals, as set forth in its General Plan.
- Maximize tax revenue to the City of Susanville.
- Provide employment opportunities for residents of the City of Susanville and surrounding areas.
- Construct a facility with proximal access to adequate existing or anticipated utility infrastructure to support planned operations.
- Provide a travel stop facility of sufficient size to capture overflow overnight truck parking.

ES.2.4 Characteristics of the Project

The project includes a full-service travel stop.

Project characteristics and design features are listed below and summarized in the following sections:

- a 12-position passenger vehicle fueling station;
- a 4-position truck fueling station;
- a combined 13,005-square foot (SF) convenience store and two fast-food options, approximately 25 ft in height; 7,943 SF would be convenience store, the smaller of the two fast food options would be 1,588 SF with 3,474 SF for the fast-food restaurant with drive-thru;
- a 5,000 SF dog park;
- a truck scale;
- an RV dump station;
- a 1,000-gallon propane tank;
- a 30,000-gallon below ground gasoline storage tank, including fuel delivery parking;
- four 12,000-gallon above-ground diesel storage tanks for truck fueling, including fuel delivery parking;
- a 20,000 two-compartment below ground split tank with 12,000 gallons of diesel for automobiles and 8,000 of premium unleaded for automobiles;
- a 20,000-gallon below ground diesel exhaust fluid storage tank
- 70 standard truck parking spaces (all available for overnighting), 53 automobile parking spaces, five RV parking spaces, three electric vehicle (EV) charging station spaces, three accessible parking spaces and 10 overnight RV parking spaces with full hookups (power, water, and sewer);
- on site lighting, consisting of high-mast LED fixtures and LED canopy lighting - 43' in truck areas and 33' in auto areas;
- high-rise sign (75 ft in height), and other directional signage;
- bicycle rack and bicycle parking (8 short term spaces and 2 long term spaces);
- trash compactor, recycling and grease collection bins;
- landscaping, hardscaping, pavement, and fencing;
- one 200,000-gallon fire water supply storage tank and associated booster pump;
- four stormwater bioretention basins between - 6,272 SF and 86,247 SF;
- rooftop solar panels and other sustainability features; and
- utility extensions for gas, water and sewer.

The project would include a variety of offsite improvements, including street improvements and transitions, drainage facility connections, utility connections, and landscaping. New gas, water, and sewer lines would also be required to serve the project's needs. Water and gas would be brought to the site from the water main and Susanville gas lateral on Johnstonville Road via Skyline Road, on the west side of the road. The gas and water lines would be trenched either side of the Susan River but would be pumped through a pipe that would be hung from the side of the bridge on Skyline Road over the Susan River. The sewer line would be bored under the Caltrans right-of-way to the east side of SR 36 and trenched either side of the Susan River but, with Caltrans permission and an encroachment permit in accordance with Caltrans standards, would be hung from the SR 36 bridge over the Susan River, before tying in to the existing sanitary sewer manhole at the SR 36/Riverside Drive intersection.

ES.2.5 Annexation into City of Susanville

Currently the project site is adjacent to, and outside the city limits, but within the City's approved Sphere of Influence. The site is thus within the "probable physical boundaries" of the City as it is expected to be expanded in the future, as previously determined by the Lassen County Local Agency Formation Commission (LAFCO; see Government Code Section 56076 ["'sphere of influence' means a plan for the probable physical boundaries and service area of a local agency, as determined by the commission"]). As part of the package or regulatory approvals required for the proposed project, the project applicant is requesting that LAFCO approve the annexation of the site into the City of Susanville City Limits, which would take the site out of the current land use planning jurisdiction of Lassen County.

ES.3 ENVIRONMENTAL IMPACTS AND RECOMMENDED MITIGATION MEASURES

ES.3.1 Project-Specific Impacts

This EIR has been prepared pursuant to the CEQA (Public Resources Code [PRC] Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Section 15000, et seq.) to evaluate the physical environmental effects of the Project. The City of Susanville is the lead agency for the project. The City has the principal responsibility for approving and carrying out the project and for ensuring that the requirements of CEQA have been met. After the Final EIR is prepared and the EIR public-review process is complete, the City Manager is the party responsible for certifying that the EIR adequately evaluates the impacts of the project.

Table ES-1, presented at the end of this chapter, provides a summary of the environmental impacts for the Project. The table provides the level of significance of the impact before mitigation, recommended mitigation measures, and the level of significance of the impact after implementation of the mitigation measures.

As explained in the NOP and summarized in the "Effects Found Not To Be Significant" section at the beginning of Chapter 3, "Environmental Impacts and Mitigation Measures," impacts related to the following environmental issue areas are not anticipated and were therefore excluded from discussion in the EIR:

- Agriculture and Forestry Resources;
- Hazards and Hazardous Materials;
- Hydrology and Water Quality;
- Land Use and Planning;
- Mineral Resources;
- Population and Housing;
- Public Services
- Recreation; and
- Wildfire

Other issues not discussed further because they would result in no impact are described in Sections 3.1 through 3.11 of this EIR.

ES.3.2 Project Impacts and Cumulative Impacts

As summarized in Table ES-1, all of the impacts associated with the proposed project would be less than significant or reduced to a less-than-significant level after implementation of the recommended mitigation measures. Additionally, the project would not result in a cumulatively considerable contribution to a significant cumulative impact.

ES.4 ALTERNATIVES TO THE PROPOSED PROJECT

The following provides brief descriptions of the alternatives evaluated in this Draft EIR. Table ES-2 presents a comparison of the environmental impacts between the alternatives and the proposed project.

- Alternative 1: **No Project – No Development Alternative** assumes no demolition or new construction occurs on the project. The site would remain in its current undeveloped condition.
- Alternative 2: **No Drive Thru Fast-Food Restaurant Alternative** assumes that the proposed drive-thru fast-food restaurant will not have a drive-thru component and only be walk-in.
- Alternative 3: **No Overnight RV Parking Alternative** assumes that the proposed overnight RV parking would not be included as part of the proposed project.

ES.4.1 Environmentally-Superior Alternative

Alternative 1, the No Project-No Development Alternative would avoid the adverse impacts generated by the construction and operation of the proposed project. Therefore, it is considered the environmentally superior alternative. However, the No Project–No Development Alternative would not meet the project objectives.

When the environmentally superior alternative is the No Project Alternative, the State CEQA Guidelines (Section 15126[d][2]) require selection of an environmentally superior alternative other than the No Project Alternative from among the other action alternatives evaluated.

As illustrated in Table ES-2, below, the No Fast-Food Drive-Thru Alternative would be environmentally superior action alternative because although the environmental impacts would be similar to those of the proposed project and Alternative 3, the reduced degree of fast-food drive-thru traffic would incrementally reduce the emissions of criteria air pollutants, GHGs, noise and VMT generated by the proposed project drive-thru. The incremental decrease in air quality, GHG, noise and transportation impacts is a greater incremental decrease than the reductions associated with Alternative 3.

ES.5 ENVIRONMENTAL REVIEW PROCESS

ES.5.1 Initial Study

In accordance with CEQA Guidelines Section 15063(a), the City prepared an Initial Study (located in Appendix A, Initial Study, of this Draft EIR). The Initial Study determined that the Project had the potential to result in significant impacts associated with a number of environmental issues. As a result, the Initial Study determined that this Draft EIR should address those issues where the Project could result in significant environmental impacts and consider mitigation measures.

The Draft EIR focuses primarily on changes in the environment that would result from the Project, individually and cumulatively with other development projects. The Draft EIR identifies potentially significant direct and indirect impacts resulting from construction and operation of the Project and provides Project Design Features (PDF) and mitigation measures to reduce or avoid such effects. Based on public input and the results of the Initial Study, this Draft EIR addresses environmental effects in the following areas:

- Aesthetics (effect scenic vistas and public views)
- Air Quality (increase of any criteria pollutants and exposure to substantial pollutant concentrations)
- Biological Resources (special-status species, riparian habitats and protected wetlands)
- Cultural Resources (historic and archaeological resources).
- Energy (wasteful, inefficient, or unnecessary consumption of energy resources)
- Geology and Soils (paleontological resources)
- Greenhouse Gas Emissions (generation of GHGs)
- Noise (all except airport land use plan)
- Transportation (conflict with plan/program and VMT)
- Tribal Cultural Resources
- Utilities and Service Systems (construction of new or expanded utilities)

ES.5.2 Notice of Preparation, Scoping, and Areas of Controversy and Issues to be Resolved

Pursuant to the provision of CEQA Guidelines Section 15082, the City circulated a Notice of Preparation (NOP) for a 30-day period, beginning on February 3, 2025 and ending on March 5, 2025, to responsible agencies, interested parties, and organizations, as well as private organizations and individuals that may have an interest in the project. A public scoping meeting was held on February 20, 2025. The purpose of the NOP and the scoping meeting was to provide notification that an EIR was being prepared for the project and to solicit input on the scope and content of the environmental document. The NOP also disclosed that an Initial Study was prepared for the Project (as detailed above) and made available together with the NOP for public review and comment.

CEQA Guidelines section 15123(b)(2) requires that the summary chapter of an EIR identify "[a]reas of controversy known to the Lead Agency including issues raised by agencies and the public."

The City received nine comment letters in response to the NOP. The NOP and comment letters are included in Appendix A of this Draft EIR. Key concerns and issues that were expressed during the scoping process included the following:

- Native American Heritage Commission (NAHC). The letter provides a summary of tribal consultation requirements pursuant to Assembly Bill 52 and Senate Bill 18 and NAHC's recommendations for conducting cultural resources assessments.
- Private citizen. This letter supports the project and considers the positive safety and economic impact.
- Private citizen. This letter supports the project and considers the positive economic impact.
- Private citizen. This letter supports the project and recommends Electric Charging Stations be considered in the project design.
- Private citizen. This letter supports the project and considers the positive job opportunities.
- California Department of Fish and Wildlife (CDFW). The letter from CDFW offers recommendations to assist the City in adequately identifying, avoiding, minimizing and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on biological resources.
- Private citizen. This letter recommends consideration of water quality and land classification.

- California Department of Transportation (Caltrans). The letter mentions that a flood study will not be necessary upon further analysis of the floodplain. Additionally, should the City qualify for the Rainfall Erosivity Waiver, the City would not need to implement a Stormwater Pollution Plan (SWPPP).
- County of Lassen. The letter mentions that the proposed use is not allowed by right or use permit in the subject zoning district, and would therefore require a rezone, General Plan amendment, and a use permit. Furthermore, due to the fact the project site is in a scenic highway corridor, aesthetics should be discussed in the EIR, despite that it was previously scoped out in the Initial Study.

These issues are each addressed in this Draft EIR and any impacts related to these issues are either identified as less than significant, or less than significant after mitigation. If areas of controversy emerge through comments on this Draft EIR, this section will be amended and updated to include those areas of controversy.

Table ES-1 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Aesthetics			
Impact 3.1-1: Have a substantial adverse effect on a scenic vista	LTS	No mitigation is required.	LTS
Impact 3.1-2: In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	LTS	No mitigation is required.	LTS
Cumulative Impacts	LTS	No mitigation is required.	LTS
Air Quality			
Impact 3.2-1: Construction Emissions of Criteria Air Pollutants and Ozone Precursors	LTS	No mitigation is required.	LTS
Impact 3.2-2: Operational Emissions of Criteria Air Pollutants and Ozone Precursors	LTS	No mitigation is required.	LTS
Impact 3.2-3: Expose Sensitive Receptors to Substantial Pollutant Concentrations	LTS	No mitigation is required.	LTS
Cumulative Impacts	LTS	No mitigation is required.	LTS
Biological Resources			
Impact 3.3-1: Have a Substantial Adverse Effect on Special-Status Plant Species	LTS	No mitigation is required.	LTS
Impact 3.3-2: Have a Substantial Adverse Effect on Special-Status Wildlife Species, Native Raptors, and Other Native Nesting Birds	PS	**Mitigation Measure 3.3-2a: Conduct Focused Surveys for Other Special-Status Birds, Nesting Raptors, and Other Native Nesting Birds and Implement Protective Buffers** ▶ To minimize the potential for loss of special-status bird species, raptors, and other native birds, project activities (e.g., vegetation clearing, ground disturbance, staging) should be conducted during the nonbreeding season (approximately September 1-January 31, as determined by a qualified biologist). If project activities are conducted during the nonbreeding season, no further mitigation would be required. ▶ Within 14 days before the onset of any project activities to be implemented during the breeding season (approximately February 1 through August 31, as determined by a qualified biologist), a qualified biologist familiar with the birds of California and with experience conducting nesting bird surveys will conduct focused surveys for special-status birds, other nesting raptors, and other native bird nests. Surveys shall be conducted in accessible areas within 0.25 mile of the	LTS

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Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		project site for bald eagles, golden eagles, and Swainson's hawks, within 500 feet of the project site for other raptor species and special-status birds, and within 50 feet of the project site for non-raptor common native bird nests. ▶ If no active nests are found, the qualified biologist shall submit a memo documenting the survey methods and results to the applicant and the City of Susanville, and no further mitigation would be required. ▶ If active nests are found, impacts on nesting birds shall be avoided by establishing appropriate buffers around active nest sites identified during focused surveys to prevent disturbance to the nest. Project activity shall not commence within the buffer areas until a qualified biologist has determined that the young have fledged, the nest is no longer active, or reducing the buffer would not likely result in nest abandonment. Buffers typically would be 0.25 mile for bald eagle and golden eagle, and 500 feet for other raptors and special-status birds (e.g., bank swallow). Buffer size for non-raptor common bird species would be determined by a qualified biologist. Factors to be considered for determining buffer size would include presence of natural buffers provided by vegetation or topography, nest height above ground, baseline levels of noise and human activity, species sensitivity, and proposed project activities. Generally, buffer size for common bird nests would be at least 20 feet. The size of the buffer may be adjusted if a qualified biologist determines that such an adjustment would not be likely to adversely affect the nest. Any buffer reduction for individuals of a species listed as endangered or threatened under the Endangered Species Act or the California Endangered Species Act or that is a candidate for listing under the California Endangered Species Act would require consultation with CDFW and/or USFWS, depending on the species' legal status. Periodic monitoring of the nest by a qualified biologist during project activities would be required if the activity has potential to adversely affect the nest, the buffer has been reduced, or if birds within active nests are showing behavioral signs of agitation (e.g., standing up from a brooding position, flying off the nest) during project activities, as determined by the qualified biologist. ▶ Removal of bald eagle and golden eagle nests is prohibited regardless of the occupancy status under the federal Bald and Golden Eagle Protection Act. If bald eagle or golden eagle nests are found during focused surveys, then the nest would not be removed. **Mitigation Measure 3.3-2b: Conduct Focused Western Bumble Bee Survey and Establish Protective Buffers**	

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Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		▶ Within 14 days before commencement of project activities, a qualified wildlife biologist with familiarity with western bumble bee and experience using survey methods for the species shall conduct focused surveys of habitat suitable for the species within the project site. ▶ If no western bumble bee is found, the qualified biologist shall submit a memo documenting the survey methods and results to the applicant and the City of Susanville, and no further mitigation will be required. ▶ If western bumble bee is found, impacts to western bumble bee shall be avoided by establishing exclusion zones around occupied nests and floral resources within 100 meters of nests during the breeding/flight season of April-August. **Mitigation Measure 3.3-2c: Conduct Focused Western Pond Turtle Survey and Establish Protective Buffers** ▶ Within 14 days before commencement of project activities, a qualified wildlife biologist familiar with western pond turtle shall conduct focused surveys for western pond turtle within upland nesting habitat areas suitable for the species. ▶ If western pond turtles are not found, the qualified biologist shall submit a memo summarizing the results of the survey to the applicant and the City of Susanville, and no further mitigation will be required. ▶ If a western pond turtle is found, flagging areas for avoidance, relocation of individual animals by a qualified wildlife biologist with a valid CDFW scientific collecting permit, and/or other measures recommended by a qualified biologist as necessary to avoid injury to or mortality of western pond turtles shall be required. ▶ If a western pond turtle nest is found, impacts to the nest shall be avoided by establishing exclusion zones around all active nests, the size of which shall be determined by the qualified biologist. No project activities (e.g., vegetation removal, ground disturbance, staging, heavy equipment use) may occur within the exclusion zone until nesting activities are complete or the nest is abandoned, as confirmed by a qualified biologist. The qualified biologist shall monitor each nest once per week to track the status of the nest and to determine when it is no longer occupied. When it is no longer occupied, project activities within the exclusion zone may occur.	

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Impact 3.3-3: Have a Substantial Adverse Effect on Riparian Habitat or Other Sensitive Natural Communities	PS	**Mitigation Measure 3.3-3: Delineate Sensitive Natural Communities, Implement Avoidance Buffers, and If Needed, Compensate for Unavoidable Losses** ▶ Prior to implementation of project activities on the banks of the Susan River or the distributary stream, a qualified biologist shall demarcate the extent of riparian habitat present on the banks and establish a no-disturbance buffer outside the dripline of the riparian vegetation using flagging or high-visibility construction fencing. No vegetation removal or ground disturbing activities will occur within this buffer. ▶ If riparian habitat cannot be avoided (e.g., if riparian vegetation must be removed or trimmed) or if drilling for jack and bore is required within the riparian corridor, the riparian habitat will be restored to pre-project conditions following completion of construction activities that affect riparian habitat. If riparian vegetation must be removed during off-site utility construction and cannot be restored at the same location, the applicant will restore degraded riparian habitat at another location within the study area (the 79.6-acre parcel) at a 2 to 1 ratio (2 acres restored for every acre lost as a result of project activities). ▶ Before commencing any activity, including directional drilling, that may divert the natural flow or otherwise alter the Susan River or other stream resources, including riparian habitat on, or with roots reaching to, the bank of the Susan River, the applicant shall notify CDFW through issuance of a Lake and Streambed Alteration Notification (notification). If CDFW determines, based on the notification, that project activities trigger the need for a Lake and Streambed Alteration Agreement, the proponent shall obtain an agreement from CDFW before the activity commences. The applicant shall conduct project construction activities in accordance with the agreement, including implementing reasonable measures in the agreement necessary to protect fish and wildlife resources, when working within the bed or bank of waterways or in riparian habitats associated with those waterways. These measures may include demarcation of the construction area, biological monitoring, preparation of an inadvertent release (frac-out) contingency plan for directional drilling, erosion control, environmental awareness training for construction crews, and compensatory measures (e.g., restoration, long-term habitat management. ▶ Prior to implementation of project activities, a qualified biologist shall conduct protocol-level surveys to delineate sensitive natural communities within the project site following survey methods from CDFW's *Protocols for Surveying and Evaluating Impacts on Special-Status Native Plant Populations and Natural Communities* (CDFW 2018 or most recent version).	LTS

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		▶ If ashy ryegrass - creeping wildrye turfs sensitive natural community is not found on the project site, access routes, or staging areas, the biologist shall document the findings in a memo to the applicant and the City of Susanville, and no further mitigation will be required. ▶ If ashy ryegrass - creeping wildrye turfs sensitive natural community are found, the area occupied by this community shall be avoided completely, if avoidance can be achieved in light of project layout, design, engineering considerations, and utility alignments. This may include establishing a no-disturbance buffer around the vegetation community and demarcation of this buffer by a qualified biologist or botanist using flagging or high-visibility construction fencing. The size of the buffer shall be determined by the qualified biologist or botanist and shall be large enough to avoid direct or indirect impacts on the sensitive natural community. ▶ If ashy ryegrass - creeping wildrye turfs are found on the project site and cannot be avoided, the applicant shall compensate for unavoidable losses to the sensitive natural community by: ▪ restoring degraded ashy ryegrass - creeping wildrye turfs within the study area (the 79.6 acre parcel) at a 1 to 1 ratio (1 acre restored for every acre lost as a result of project activities); ▪ restoring degraded ashy ryegrass - creeping wildrye turf outside of the study area at a 1 to 1 ratio (1 acre restored for every acre lost as a result of project activities); or ▪ preserving existing stands of ashy ryegrass - creeping wildrye turfs of equal or better value and equal acreage to those lost as a result of project activities through establishment of a conservation easement.	
Impact 3.3-4: Have a Substantial Adverse Effect on State or Federally Protected Wetlands	PS	**Mitigation Measure 3.3-4: Avoid impacts to waters of the United States and state, including wetlands** ▶ The project applicant shall design the project to avoid impacts to waters of the United States and state, including wetlands. If the project cannot be designed to avoid state or federally protected wetlands and other waters, the delineation report shall be submitted to USACE, and a jurisdictional determination shall be requested. ▶ If state or federally protected wetlands or waters are determined to be present within the project site that can be avoided, a qualified aquatic resources biologist (hereafter referenced as a qualified biologist) shall establish a buffer	LTS

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Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		around wetlands and mark the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The buffer shall be a minimum width of 25 feet but may be larger if deemed necessary. The appropriate size and shape of the buffer zone shall be determined in coordination with the qualified biologist and shall depend on the type of wetland present (e.g., stream, fresh emergent wetland), the timing of project activities (e.g., wet or dry time of year), environmental conditions and terrain, and the project activity being implemented. ▶ Project activities (e.g., ground disturbance, vegetation removal, staging) shall be prohibited within the established buffer. The qualified biologist shall periodically inspect the materials demarcating the buffer to confirm that they are intact and visible, and wetland impacts are being avoided. ▶ If it is determined that fill of wetlands or other waters of the United States would result from project implementation, authorization for such fill shall be secured from USACE and the RWQCB through CWA Sections 401 and 404 permitting processes. In association with the Section 404 permit (if applicable) and prior to the issuance of any grading permit, Section 401 Water Quality Certification from the Lahontan RWQCB shall be obtained. For impacts on waters of the state and state protected wetlands that are not also waters of the United States and are therefore not covered by the 401 Water Quality Certification, the applicant shall apply to the Lahontan RWQCB for Waste Discharge Requirements following the State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State (SWRCB 2021). Any wetlands or other waters of the United States or waters of the state that are filled by the project shall be replaced or restored on a no-net-loss basis in accordance with the applicable USACE and California Water Board mitigation standards in place at the time of construction. ▶ Before commencing any activity, including directional drilling, that may divert the natural flow or otherwise alter the Susan River or other stream resources, including riparian habitat on, or with roots reaching to, the bank of the Susan River, the applicant shall notify CDFW through issuance of a Lake and Streambed Alteration Notification (notification). If CDFW determines, based on the notification, project activities trigger the need for a Lake and Streambed Alteration Agreement, the proponent shall obtain an agreement from CDFW before the activity commences. The applicant shall conduct project construction activities in accordance with the agreement, including implementing reasonable	

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Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		measures in the agreement necessary to protect fish and wildlife resources, when working within the bed or bank of waterways or in riparian habitats associated with those waterways. These measures may include demarcation of the construction area, biological monitoring, preparation of an inadvertent release (frac-out) contingency plan for directional drilling, erosion control, environmental awareness training for construction crews, and compensatory measures (e.g., restoration, long-term habitat management).	
Cumulative Impacts	LTS	No mitigation is required.	LTS
Cultural Resources			
Impact 3.4-1: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources	PS	**Mitigation Measure 3.4-1a: Worker Awareness Training** Prior to the initiation of project construction, the project applicant shall ensure that all crew members and contractors conducting ground-disturbing activities receive training overseen by a qualified professional archaeologist on the protection of sensitive archaeological, historical, and tribal cultural resources. As part of the training, workers shall be instructed to halt work if cultural resources are encountered during ground-disturbing activities. In addition, workers shall be instructed to not return to work in the location of the find until instructed to do so by management. **Mitigation Measure 3.4-1b: For All Ground-Disturbing Construction Activities, Halt Ground Disturbance Upon Discovery of Subsurface Archaeological Features** If archaeological materials (e.g., locally darkened soils [i.e., midden], stone tools, chipped stone, baked clay, or concentrations of shell, bone, charcoal, glass, metal, or ceramics) are inadvertently discovered during ground-disturbing activities, the contractor shall cease all work within 100 feet (30.5 meters) of the find and the project applicant shall immediately retain the services of a qualified professional archaeologist. At that time, the City's Manager or their designee (Manager) shall coordinate any necessary investigation of the site with the archaeologist as needed to evaluate the significance of the resource per PRC Sections 5024.1, 21083.2(g), and 21074 (i.e., to determine whether the resource qualifies as a unique archaeological resource, an historical resource of an archaeological nature, or a tribal cultural resource) and provide proper management recommendations. If the qualified archaeologist determines that the discovered resource qualifies as, or includes, unique archaeological resources, historical resources of an archaeological nature, or tribal cultural resources, the qualified archaeologist shall develop mitigation or treatment measures for consideration and approval by the Manager	LTS

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Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		in consultation with the project applicant. The Manager may also consult with the State Historic Preservation Officer [SHPO], a representative of any Native American Tribe potentially interested in a possible tribal cultural resource, or any other regulatory agency that the Manager believes may have informed and useful input to provide. Mitigation shall be developed and implemented in accordance with Public Resources Code Section 21083.2 and Section 15126.4 of the CEQA Guidelines, with a preference for preservation in place. Consistent with Section 15126.4(b)(3), preservation in place may be accomplished through one or more of the following: planning construction to avoid the resource; incorporating the resource within open space; capping and covering the resource; or deeding the site into a permanent conservation easement. If approved by the Manager, such measures shall be implemented and completed prior to commencing further work for which grading or building permits were issued, unless otherwise directed by the Manager. Avoidance or preservation of unique archaeological resources, historical resources of an archaeological nature, or tribal cultural resources shall not be required where such avoidance or preservation in place would preclude the construction of important project structures or project infrastructure or would require exorbitant expenditures, as determined by the Manager in consultation with the project applicant. Where avoidance or preservation are not appropriate for these reasons, the qualified archaeologist, in consultation with the Manager, shall prepare a detailed recommended a treatment plan for consideration and approval by the Manager, which may include data recovery. Where tribal cultural resources are involved, the Manager shall also consult with any known representative of a Native American Tribe potentially interested in the tribal cultural resource. If employed, data recovery strategies for unique archaeological resources that do not also qualify as historical resources of an archaeological nature shall follow the applicable requirements and limitations set forth in Public Resources Code Section 21083.2. Where tribal cultural resources are involved, data recovery shall not occur over the objections of any known representative of a Native American Tribe potentially interested in the tribal cultural resource. Data recovery will normally consist of (but would not be limited to) sample excavation, artifact collection, site documentation, and historical research, with the aim of recovering important scientific data contained within the unique archaeological resource or historical resource of an archaeological nature. The data recovery plan shall include provisions for analysis of data in a regional context, reporting of results within a timely manner, curation of artifacts and data at an approved facility, and dissemination of reports to local and State repositories, libraries, and interested	

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Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		professionals. If data recovery is determined by the Manager or a tribal representative to be inappropriate, then an equally effective treatment shall be proposed and implemented. Where tribal cultural resources are involved, the Manager, in formulating a treatment strategy, shall consult with any known representative of a Native American Tribe potentially interested in the tribal cultural resource. No treatment strategy for tribal cultural resources shall be approved over the objections of such a tribal representative. Work may not resume within the no-work radius until the Manager, in consultation with the qualified archaeologist, determines that the site either: 1) does not contain unique archaeological resources, historical resources of an archaeological nature, or tribal cultural resources; or 2) that the preservation and/or treatment measures have been completed to the Manager's satisfaction.	
Cumulative Impacts	LTS	No mitigation is required.	LTS
Energy			
Impact 3.5-1: Wasteful, Inefficient, or Unnecessary Consumption of Energy, During Project Construction or Operation	LTS	No mitigation is required.	LTS
Cumulative Impacts	LTS	No mitigation is required.	LTS
Geology and Soils			
Impact 3.6-1: Destroy a unique paleontological resource or site or unique geologic feature	PS	**Mitigation Measure 3.6-1: Implement a Paleontological Resource Impact Mitigation Program** ▶ Prior to the start of construction activities, the applicant shall retain a federally qualified paleontologist (qualified paleontologist) that meets the standards of the Society for Vertebrate Paleontology (2010) to carry out all mitigation measures related to paleontological resources. ▶ Before any ground-disturbing activities, the qualified paleontologist shall conduct pre-construction worker paleontological resources sensitivity training. The qualified paleontologist shall conduct any construction worker paleontological resources sensitivity training either in person or via a training module. The training shall include information on what types of paleontological resources could be encountered during excavations, what to do in case an unanticipated discovery is made by a worker, and laws protecting paleontological resources. All construction personnel shall be informed of the possibility of encountering fossils and be instructed to immediately inform the construction foreman or supervisor if any bones or other potential fossils are	LTS

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Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		unexpectedly unearthed in an area where a paleontological monitor is not present. The applicant shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance. ▶ The qualified paleontologist shall supervise a paleontological monitor who meets the Society for Vertebrate Paleontology standards (2010). The paleontological monitor shall be present during all excavations in the Quaternary lake sediments or when excavations in the alluvium are deep enough to encounter the older Pleistocene lake sediments. The exceptions are borings or auguring less than 3 feet in diameter. Specific depths and monitoring locations will be based on the finalized excavation plans, any available geotechnical reports, and consultation between the qualified paleontologist and the construction liaison. ▶ Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened standard sediment samples (up to 4.0 cubic yards) of promising horizons for smaller fossil remains (SVP 2010). Depending on the conditions encountered, full-time monitoring can be reduced to part-time inspections or ceased entirely if determined adequate by the qualified paleontologist, particularly if excavation is limited to artificial fill or the younger alluvium. The qualified paleontologist may spot check the excavation on an intermittent basis and recommend whether the depth of required monitoring should be revised based on his/her observations. Monitoring activities should be documented in a Paleontological Resources Monitoring Report to be prepared by the qualified paleontologist at the completion of construction and shall be provided to the applicant within six months of project completion. If fossil resources are identified during monitoring, the report will also be filed with the UCMP or other similar repository. ▶ If a paleontological resource is discovered during construction, the paleontological monitor shall be empowered to temporarily divert or redirect grading and excavation activities around the exposed resource to facilitate evaluation of the discovery. The qualified paleontologist shall analyze the discovered paleontological resource to determine whether it qualifies as a "unique paleontological resource." A unique paleontological resource means a paleontological resource about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high	

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Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		probability that it meets one of the two following criteria: (1) contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; or (2) has a special and particular quality such as being the oldest of its type or the best available example of its type. ▶ During the time period in which this assessment is being conducted, an appropriate buffer area of 50 feet around the fossil discovery shall be established by the qualified paleontologist where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All significant fossils qualifying as unique paleontological resources shall be collected by the paleontological monitor and/or the qualified paleontologist. Collected fossils should be prepared to the point of identification and catalogued before they are submitted to their final repository. Any fossils collected should be curated at a public, non-profit institution with a research interest in the materials, such as the UCMP, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, photographs, and a technical report shall also be filed at the repository and/or school.	
Cumulative Impacts	LTS	No mitigation is required.	LTS
Greenhouse Gas Emissions and Climate Change			
Impact 3.7-1: Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment	LTS	No mitigation is required.	LTS
Cumulative Impacts	LTS	No mitigation is required.	LTS
Noise and Vibration			
Impact 3.8-1: Generate a Substantial Increase in Short-Term Construction Noise	LTS	No mitigation is required.	LTS
Impact 3.8-2: Generate a Substantial Increase in Off-Site Transportation Noise	LTS	No mitigation is required.	LTS
Impact 3.8-3: Generate a Substantial Increase in Long-Term Stationary Operational Noise	LTS	No mitigation is required.	LTS
Impact 3.8-4: Generate a Substantial Increase in Short-Term Construction Vibration	LTS	No mitigation is required.	LTS
Cumulative Impacts	LTS	No mitigation is required.	LTS

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Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Transportation			
Impact 3.9-1: Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities	LTS	No mitigation is required.	LTS
Impact 3.9-2: Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)	LTS	No mitigation is required.	LTS
Cumulative Impacts	LTS	No mitigation is required.	LTS
Tribal Cultural Resources			
Impact 3.10-1: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource	PS	**Mitigation Measure 3.10-1a: Worker Awareness Training** Implement Mitigation Measure 3.4-1a. **Mitigation Measure 3.10-1b: For All Ground-Disturbing Construction Activities, Halt Ground Disturbance Upon Discovery of Subsurface Tribal Cultural Resources** Implement Mitigation Measure 3.4-1b.	LTS
Cumulative Impacts	LTS	No mitigation is required.	LTS
Utilities and Service Systems			
Impact 3.11-1: Significant Environmental Effects from the Relocation or Construction of New or Expanded Utility Infrastructure	LTS	No mitigation is required.	LTS
Cumulative Impacts	LTS	No mitigation is required.	LTS

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Table ES-2 Summary Environmental Impacts of the Alternatives Relative to the Proposed Project

Environmental Topic	Proposed Project	Alternative 1: No Project – No Development Alternative	Alternative 2: No Fast-Food Restaurant Drive-Thru Alternative	Alternative 3: No Overnight RV Parking Alternative
Aesthetics				
Impact 3.1-1: Have a substantial adverse effect on a scenic vista	LTS	NI	LTS	LTS
Impact 3.1-2: In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	LTS	NI	LTS	LTS
Air Quality and Greenhouse Gas Emissions				
Impact 3.2-1: Construction Emissions of Criteria Air Pollutants and Ozone Precursors	LTS	NI	LTS	LTS
Impact 3.2-2: Operational Emissions of Criteria Air Pollutants and Ozone Precursors	LTS	NI	LTS	LTS
Impact 3.2-3: Expose Sensitive Receptors to Substantial Pollutant Concentrations	LTS	NI	LTS	LTS
Biological Resources				
Impact 3.3-1: Have a Substantial Adverse Effect on Special-Status Plant Species	LTS	NI	LTS	LTS
Impact 3.3-2: Have a Substantial Adverse Effect on Special-Status Wildlife Species, Native Raptors, and Other Native Nesting Birds	LTS MM	NI	LTS MM	LTS MM
Impact 3.3-3: Have a Substantial Adverse Effect on Riparian Habitat or Other Sensitive Natural Communities	LTS MM	NI	LTS MM	LTS MM
Impact 3.3-4: Have a Substantial Adverse Effect on State or Federally Protected Wetlands	LTS MM	NI	LTS MM	LTS MM
Cultural Resources and Tribal Cultural Resources				
Impact 3.4-1: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources Impact 3.10-1: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource	LTS MM	NI	LTS MM	LTS MM

Energy				
Impact 3.5-1: Wasteful, Inefficient, or Unnecessary Consumption of Energy, During Project Construction or Operation	NI	LTS	LTS	NI
Geology and Soils				
Impact 3.6-1: Destroy a unique paleontological resource or site or unique geologic feature	LTS MM	NI	LTS MM	LTS MM
Noise				
Impact 3.8-1: Generate a Substantial Increase in Short-Term Construction Noise	LTS	NI	LTS	LTS
Impact 3.8-2: Generate a Substantial Increase in Off-Site Transportation Noise	LTS	NI	LTS	LTS
Impact 3.8-3: Generate a Substantial Increase in Long-Term Stationary Operational Noise	LTS	NI	LTS	LTS
Impact 3.8-4: Generate a Substantial Increase in Short-Term Construction Vibration	LTS	NI	LTS	LTS
Transportation/Traffic				
Impact 3.9-1: Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities	LTS	NI	LTS	LTS
Impact 3.9-2: Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)	LTS	NI	LTS	LTS
Utilities and Service Systems				
Impact 3.11-1: Significant Environmental Effects from the Relocation or Construction of New or Expanded Utility Infrastructure	LTS	NI	LTS	LTS

Notes: NI = No impact; LTS = Less than significant; LTS MM = Less than significant with mitigation measures

1 INTRODUCTION

This Draft Environmental Impact Report (Draft EIR) evaluates the environmental impacts of the proposed Susanville Travel Stop Project (project), State Clearinghouse (SCH) reference 2025011078. This Draft EIR has been prepared under the direction of the City of Susanville (City) in accordance with the requirements of the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000 et seq.) and the State CEQA Guidelines. This chapter of the Draft EIR provides information on:

- the project requiring environmental analysis (synopsis);
- the type, purpose, and intended uses of the Draft EIR;
- the scope of this Draft EIR;
- the agency roles and responsibilities;
- the public review process;
- the organization of the Draft EIR; and
- the standard terminology.

1.1 PROJECT REQUIRING ENVIRONMENTAL ANALYSIS

This section presents a synopsis of the proposed project characteristics. For further information on the proposed project, see Chapter 2, "Project Description." Lane Engineers, Inc. (applicant) is proposing to construct for operation a full-service travel stop on approximately 14.15 acres of vacant land to the southeast of the City of Susanville (project site). The project includes a travel stop, which would provide professional truck drivers and motorists with 24-hour access to purchase gasoline, diesel, propane, electronic items, snacks, travel items, and food from two fast-food restaurants, one with drive-thru. A dog park, Recreational Vehicle (RV) dump station, bioretention basins, truck, RV and automobile parking areas and landscaping/lighting are also proposed, along with a 10-space overnight RV park. Project visitors/customers would include "over-the-road" trucks (i.e., professional long-haul drivers who are on the road for consecutive days or weeks at a time), traveling motorists, and local residents. Primary access to the project site would be provided from State Route (SR) 36 via an existing signalized intersection at SR 36 and Skyline Road but with a new dedicated exit lane southbound and a new northbound dedicated turn lane onto Skyline Road. Ingress/egress would be provided via two entry/exit points off Skyline Road, the first for RVs and automobiles and the second for trucks.

1.2 PURPOSE AND INTENDED USES OF THIS DRAFT EIR

According to CEQA, preparation of an EIR is required whenever it can be fairly argued, based on substantial evidence, that a proposed project may result in a significant environmental impact. An EIR is an informational document used to inform public agency decision makers and the general public of the significant environmental impacts of a project, identify possible ways to minimize the significant impacts, and describe reasonable alternatives to the project that could feasibly attain most of the basic objectives of the project while substantially lessening or avoiding any of the significant environmental impacts. Public agency decision makers are required to consider the information presented in the EIR when determining whether to approve a project. This Draft EIR has been prepared to meet the requirements of a project EIR as defined by Section 15161 of the State CEQA Guidelines. A project EIR focuses on the changes in the physical environment that would result from the implementation of a project, including its planning, construction, and operation. Unlike a program EIR, which would typically focus on "broad policy alternatives and program wide mitigation measures" at an early stage of the planning process, with the expectation that more refined environmental documents might follow for future, more concrete development proposals (see State CEQA Guidelines Section 15168), a project EIR is intended to fully and completely address the environmental impacts of a specific proposed development project, so that no further environmental analysis would be required for additional regulatory

approvals following approval of the project, absent conditions requiring a subsequent EIR, a supplement to the EIR, or an addendum (See State CEQA Guidelines Sections 15162–15164). No tiering is proposed as part of the project.

1.3 SCOPE OF THIS DRAFT EIR

This Draft EIR includes an evaluation of the following environmental issue areas as well as other CEQA-mandated issues (e.g., cumulative impacts, growth-inducing impacts, significant unavoidable impacts, alternatives):

- aesthetics;
- air quality;
- biological resources;
- cultural resources;
- energy;
- geology, soils, and mineral resources;
- greenhouse gas emissions;
- noise and vibration;
- transportation/traffic;
- tribal cultural resources; and
- utilities and service systems

Under the CEQA statutes and the State CEQA Guidelines, a lead agency may limit an EIR's discussion of environmental effects when such effects are not considered potentially significant (PRC Section 21002.1[e]; State CEQA Guidelines Sections 15128, 15143). Information used to determine which impacts would be potentially significant was derived from review of the proposed project; review of applicable planning documents and CEQA documentation; field work; feedback from public and agency consultation; comments received during a public scoping meeting held on February 20, 2025; and comments received on the Initial Study (IS) and Notice of Preparation (NOP), hereafter referred to as "IS/NOP" when referencing both documents together (see Appendix A of this Draft EIR).

The NOP was distributed on February 3, 2025, to responsible agencies, interested parties, and organizations, as well as private organizations and individuals that may have an interest in the proposed project. The purpose of the NOP and the scoping meeting was to provide notification that an EIR for the proposed project was being prepared and to solicit input on the scope and content of the environmental document. As a result of the review of existing information and the scoping process, it was determined that each of the issue areas listed above should be evaluated fully in this Draft EIR.

As explained in the IS and summarized in the "Effects Found Not To Be Significant" section at the beginning of Chapter 3, "Environmental Impacts and Mitigation Measures," the Initial Study prepared for the proposed project determined that the project would not have significant impacts related to the following environmental issue areas and were therefore excluded from discussion in the EIR:

- agriculture and forestry resources,
- hazards and hazardous materials,
- hydrology and water quality,
- land use and planning,
- mineral resources,
- population and housing,
- public services,
- recreation, and
- wildfire.

Further information on the NOP and scoping process is provided below in Section 1.5, "Public Review Process."

1.4 AGENCY ROLES AND RESPONSIBILITIES

1.4.1 Lead Agency

The City of Susanville is the lead agency responsible for approving and carrying out the project and for ensuring that the requirements of CEQA have been met. After the EIR public review process is complete, the Susanville City Council, as the City's decision-making body, will determine whether to certify the EIR (see State CEQA Guidelines Section 15090) and approve the project.

1.4.2 Trustee and Responsible Agencies

A trustee agency is a State agency that has jurisdiction by law over natural resources that are held in trust for the people of the State of California. The only trustee agency that has jurisdiction over resources potentially affected by the project is the California Department of Fish and Wildlife (CDFW).

Responsible agencies are public agencies, other than the lead agency, that have discretionary approval responsibility for reviewing, carrying out, or approving elements of a project. Responsible agencies should participate in the lead agency's CEQA process, review the lead agency's CEQA document, and use the document when making a decision on project elements. As discussed under Section 1.4.3, "Scope of this Draft EIR," the Lassen Local Agency Formation Commission (LAFCO) is responsible for considering whether to approve the proposed annexation required for the proposed project and the Lahontan Regional Water Quality Control Board (LRWQCB) is responsible for issuing an National Pollutant Discharge Elimination System (NPDES) construction stormwater permit.

1.4.3 Required Permits and Approvals

The project site is currently located within the unincorporated territory of Lassen County, but within the approved Sphere of Influence of the City of Susanville. As part of the package of regulatory approvals needed for the proposed project, the City is proposing that LAFCO approve the annexation of the property into the City's boundaries. To the extent that the City would be granting approvals in advance of such action by LAFCO, those City approvals would be conditional on the ultimate action of LAFCO approving the annexation.

The discretionary actions and permits that are anticipated to be required for the proposed project include the following:

- City of Susanville - EIR certification
- City of Susanville - conditional use permit (for 75-foot sign)
- City of Susanville - architectural and site plan review
- City of Susanville - general plan amendment and prezoning/ (with annexation)
- City of Susanville/Susanville Sanitary District/Lassen Local Agency Formation Commission –annexation processing
- LRWQCB - NPDES construction stormwater permit
- Lassen County - permit to operate retail food facility
- Lassen County - planning and building service department permit to operate
- California Department of Housing and Community Development - HCD MP 500 permit to operate special occupancy RV park
- Caltrans - encroachment permit for work within the SR 36 ROW and for review and approval of utility installations on existing bridges
- Caltrans - transportation permit for oversized/overweight vehicles (may not be required)

Based on the outcome of biological surveys, additional permits and approvals may be required. These permits and approvals may include incidental take permits from CDFW, ministerial permits from the City of Susanville, and other related authorizations.

1.5 PUBLIC REVIEW PROCESS

As identified above in Section 1.3, "Scope of this Draft EIR," in accordance with CEQA regulations, an NOP was distributed on February 3, 2025, to responsible agencies, interested parties and organizations, and private organizations and individuals that could have interest in the project. The IS/NOP was available at Susanville City Hall at 66 N Lassen Street and online at the following website: https://www.cityofsusanville.net/rooptown/planning/ and an advert was published online and for 4 consecutive weeks in the Modoc County Record on February 6, 13, 20 and February 27, 2025. In addition, a virtual scoping meeting was held on February 20, 2025, from 6:00pm to 7:00pm. In addition, the IS/NOP was posted to the SCH's CEQAnet website: https://ceqanet.lci.ca.gov/2025011078.

The purpose of the NOP was to provide notification that an EIR for the proposed project was being prepared and to solicit input on the scope and content of the document. The NOP and responses to the NOP are included in Appendix A of this Draft EIR.

This Draft EIR is being circulated for public review and comment for a period of 45 days. During this period, comments from the general public as well as organizations and agencies on environmental issues may be submitted to the City of Susanville as the lead agency.

Upon completion of the public review and comment period, a Final EIR will be prepared that will include both written and oral comments on the Draft EIR received during the public review period, responses to those comments, and any revisions to the Draft EIR made in response to public comments. The Draft EIR and Final EIR together will make up the EIR for the project.

Before adopting the proposed project, the City's decision-making body (City Council) is required to certify that the EIR has been completed in compliance with CEQA, that the decision-making body reviewed and considered the information in the EIR, and that the EIR reflects the City's independent judgment.

1.6 DRAFT EIR ORGANIZATION

This Draft EIR is organized into chapters, as identified and briefly described below. Chapters are further divided into sections (e.g., Chapter 3, "Environmental Impacts and Mitigation Measures" and Section 3.6, "Energy"):

- The "Executive Summary": This chapter introduces the proposed project; provides a summary of the environmental review process, effects found not to be significant, and key environmental issues; and lists significant impacts and mitigation measures to reduce significant impacts to less-than-significant levels.
- Chapter 1, "Introduction": This chapter provides a synopsis of the project; a description of the type, purpose, and intended uses of this Draft EIR; a description of the scope of this EIR; a description of the lead and responsible agencies; a summary of the public review process; and a description of the organization of this EIR; and definitions of standard terminology used in this EIR.
- Chapter 2, "Project Description": This chapter describes the location, background, and goals and objectives for the proposed project, and describes the project elements in detail.
- Chapter 3, "Environmental Impacts and Mitigation Measures": The sections within this chapter evaluate the expected environmental impacts generated by the proposed project, arranged by subject area (e.g., Air Quality, Biological Resources etc.). Within each subsection of Chapter 3, the regulatory background, existing conditions, analysis methodology, and thresholds of significance are described. The anticipated changes to the existing conditions after development of the proposed project are then evaluated for each subject area. For any significant or potentially significant impact that would result from proposed project implementation, mitigation measures are presented and the level of impact significance after mitigation is identified. Environmental impacts

are numbered sequentially within each section (e.g., Impact 3.2-1, Impact 3.2-2). Any required mitigation measures are numbered to correspond to the impact numbering; therefore, the mitigation measure for Impact 3.2-2 would be Mitigation Measure 3.2-2.

- Chapter 4, "Cumulative Impacts": This chapter provides information required by CEQA regarding cumulative impacts that would result from implementation of the proposed project, as well as other past, present, and probable future projects.
- Chapter 5, "Alternatives": This chapter evaluates alternatives to the proposed project, including alternatives considered but eliminated from further consideration, the No Project Alternative, and two alternative development options. The environmentally superior alternative is identified.
- Chapter 6, "Other CEQA Sections": This chapter evaluates growth-inducing impacts and irreversible and irretrievable commitment of resources, and discloses any significant and unavoidable adverse impacts.
- Chapter 7, "Report Preparers": This chapter identifies the preparers of the document.
- Chapter 8, "References": This chapter identifies the organizations and persons consulted during preparation of this Draft EIR and the documents and individuals used as sources for the analysis.

1.7 STANDARD TERMINOLOGY

This Draft EIR uses the following standard terminology:

- "No impact" means no change from existing conditions (no mitigation is needed).
- "Less-than-significant impact" means no substantial adverse change in the physical environment (no mitigation is needed).
- "Potentially significant impact" means an impact that might cause a substantial adverse change in the environment (mitigation is recommended because potentially significant impacts are treated as significant). For example, with respect to cultural resources, a project impact may be potentially significant if ground disturbance is not certain to but has the potential to result in the unanticipated discovery of buried archaeological resources.
- "Significant impact" means an impact that would cause a substantial adverse change in the physical environment (mitigation is recommended). For example, with respect to noise, a project impact would be significant if construction activities are anticipated to generate a substantial increase in noise levels at a sensitive noise receptor.
- "Significant and unavoidable impact" means a substantial adverse change in the physical environment that would occur and that cannot be avoided, even with the implementation of all feasible mitigation.

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2 PROJECT DESCRIPTION

2.1 PROJECT BACKGROUND, NEED AND LOCATION

The Project applicant is proposing to construct and operate a full-service travel stop (project) on approximately 14.15 acres of vacant land to the southeast of the City of Susanville (project site) (Figure 2-1). The project site is part of a larger 79.6-acre parcel (Assessor's Parcel Number [APN] 107-280-017), located in unincorporated Lassen County that is proposed for annexation into the City of Susanville. The project site is located immediately south of Susanville city limits and west of State Route (SR) 36 (Figure 2-2), although the remainder of the 79.6-acre parcel would remain undeveloped. Existing and future truck and vehicular traffic is anticipated to generate substantial demand for the proposed travel stop facilities and services as the city lies at the junction of SR 36 and SR 139. SR 36 is an east-west highway that extends from just west of Susanville to US 101 near the California Coast. Near Susanville, the roadway serves as an important link between Redding and Red Bluff (via SR 36 and SR 44) to the west and Reno/North Lake Tahoe (via US 395) to the east. SR 139 heads north to the Oregon border as a direct route to Klamath Falls.

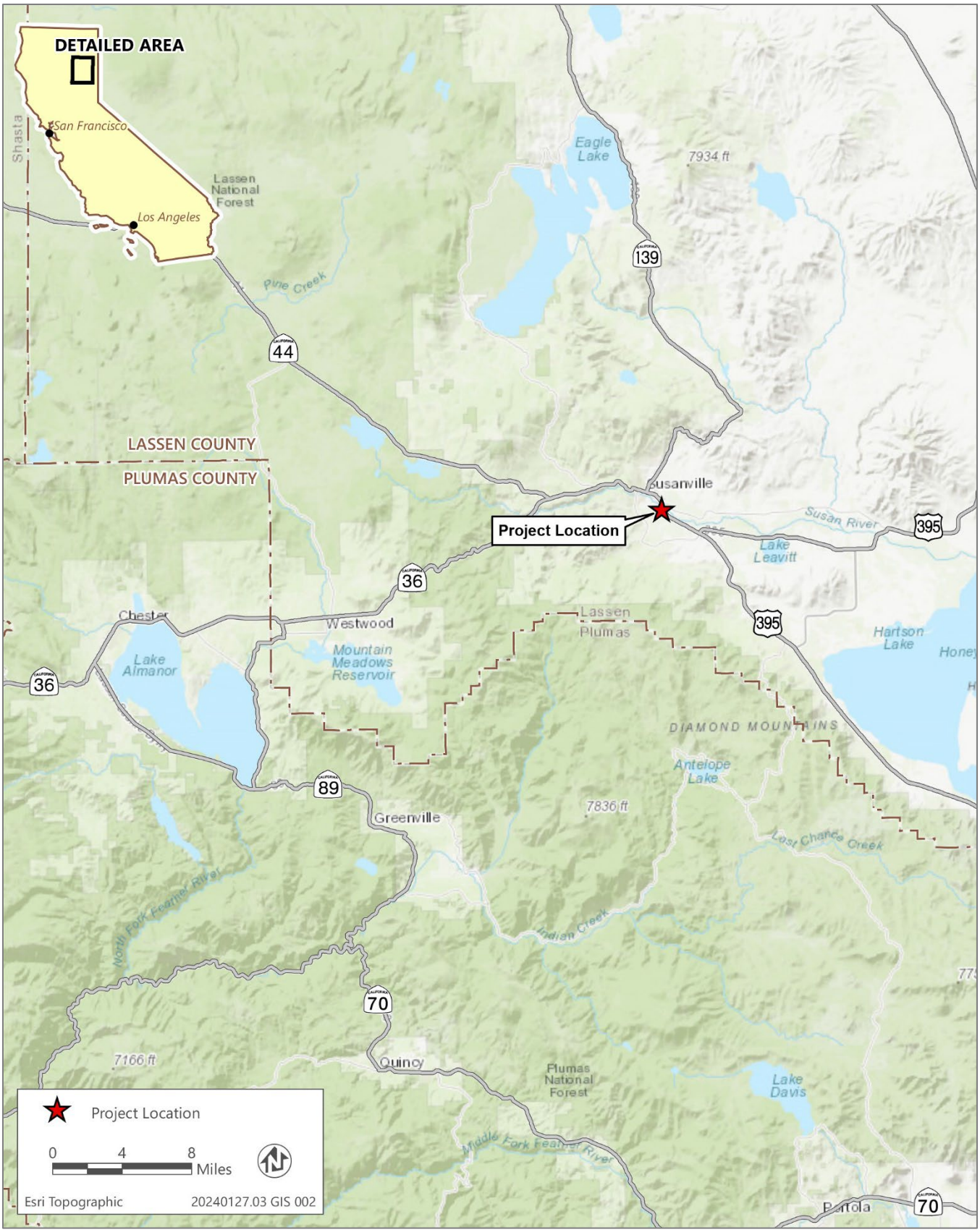
The City of Susanville is located on the Susan River in the southern part of Lassen County, California at the head of Honey Lake Valley. The city is located approximately 4.5 miles northwest of the unincorporated community of Johnstonville and 82 miles northwest of Reno. To the north, the project site is located proximate to the Susan River with Riverside Drive, commercial businesses and the Lassen County Government center beyond. To the east, the project site is bounded by SR 36 with primarily vacant land beyond. To the south, the former Southern Pacific Railroad right-of-way (ROW) is immediately adjacent to the project site, although the tracks were removed in approximately 2006 and the ROW is now an unpaved portion of Skyline Road, with several residential properties off Sierra Road present further south. Beyond Sierra Road lies agricultural land. To the west, the remainder of the project parcel is present with vacant land adjacent, and a lumber yard associated with a prefabricated construction company beyond. Susanville Municipal Airport is located approximately 3 miles southeast of the project site.

The project site is included within Assessor's Parcel Map Book 107-28, and no street address is currently assigned to the property. The project site consists of relatively disturbed, generally flat land with riverine and wetland habitat to the north associated with the Susan River. The project site is disturbed and heavily populated with invasive plant species such as perennial pepperweed (*Lepidium latifolium*) and cheatgrass (*Bromus tectorum*) as well as Medusa head (*Elymus caput-medusae*) to a lesser extent. Several barbed wire fence lines are present on the property, indicating the site was likely previously used as pastureland. Additionally, a former barn with associated outbuildings and a retention pond was present immediately west of the site, although this had been demolished by August 2019.

The project site area is generally at elevation 4,151 to 4,153 feet above mean sea level (msl). The SR 36 highway embankment and future road grade is at 4,154 ft at the intersection with Skyline Road, and the former railroad embankment is at 4,159 ft. The SR 36 embankment cuts off natural flow along the plain and water must divert northward to the Susan River channel.

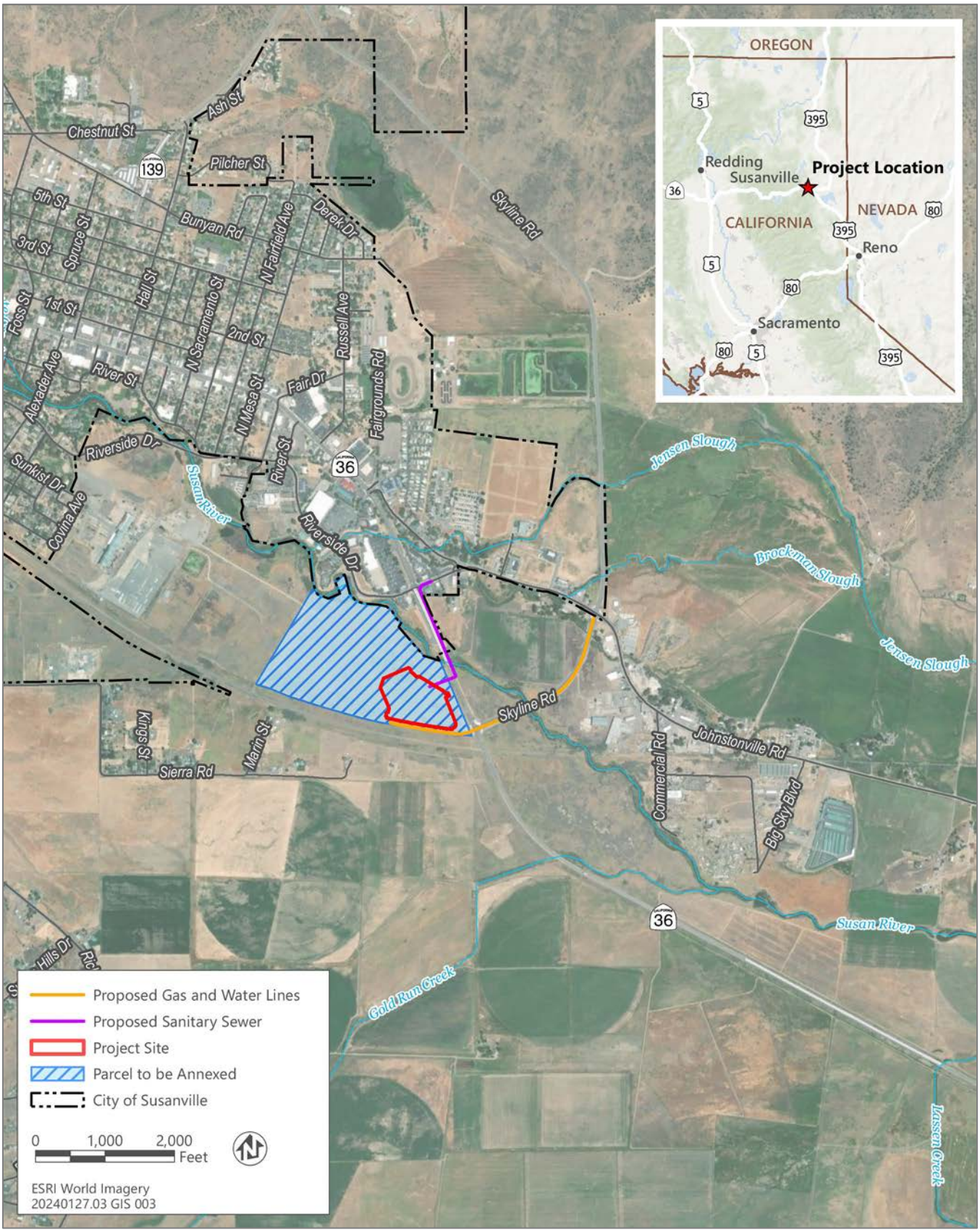
The proposed project includes a travel stop, which would provide professional truck drivers and motorists with 24-hour access to purchase gasoline, diesel, propane, electronics, snacks, travel items, and food from two fast-food restaurants, one with a drive-thru. A dog park, recreational vehicle (RV) dump station, bioretention basins, truck, RV and automobile parking areas and landscaping/lighting are also proposed, along with a 10-space overnight RV park. Project visitors/customers would include "over-the-road" trucks (i.e., professional long-haul drivers who are on the road for consecutive days or weeks at a time), traveling motorists, and local residents. Primary access to the project site would be provided from SR 36 via an existing signalized intersection at SR 36 and Skyline Road but with a new dedicated exit lane southbound and a new northbound dedicated turn lane onto Skyline Road. Ingress/egress would be provided via two entry/exit points off Skyline Road, the first for RVs and automobiles and the second for trucks.

The proposed project would install storm drains and proposed project grading would also implement stormwater control/drainage and water quality features to prevent drainage and water quality impacts, which would include bioretention ponds and standard Best Management Practices (BMPs). Additionally, a variety of offsite improvements, including highway and street improvements and transitions, drainage facility connections, utility connections (water, gas and sewer), and landscaping are proposed.



Source: Adapted by Ascent in 2024.

Figure 2-1 Regional Location



Source: Adapted by Ascent in 2025.

Figure 2-2 Project Vicinity

2.2 PROJECT OBJECTIVES

Consistent with CEQA Guidelines Section 15124(b), a clear statement of the objectives and underlying purpose of the project shall be disclosed in the Draft EIR. The underlying purpose of the project is to develop a regional travel stop and related commercial land uses on Regional Commercial (C-R)-designated land within unincorporated Lassen County on land that will be annexed into the City of Susanville via an annexation application processed by the Lassen County Local Agency Formation Commission (LAFCO). This underlying purpose, in turn, gives rise to the following project objectives:

- Create a high-quality travel stop commercial development along SR 36, a designated Surface Transportation Assistance Act (STAA) route.[1]
- Develop a property of sufficient size to create a regional travel stop that would accommodate a truck and auto fuel dispensing area, convenience store, two fast-food restaurants, dog park, truck parking and overnight RV parking.
- Construct a travel stop facility near a major highway to minimize truck and automobile movements, Vehicle Miles Traveled (VMT), and associated air pollutant and greenhouse gas emissions and traffic noise on local streets.
- Assist the City of Susanville with meeting its economic development goals, as set forth in its General Plan.
- Maximize tax revenue to the City of Susanville.
- Provide employment opportunities for residents of the City of Susanville and surrounding areas.
- Construct a facility that can be served by municipal water and sewer to support planned operations.
- Include signage visible to oncoming truck and automobile drivers along State Route 36 and Skyline Road at sufficient distances to allow the drivers to safely make their way to points of access to the project site.
- Provide a travel stop facility of sufficient size to capture overflow overnight truck parking.

2.3 PROJECT CHARACTERISTICS

The proposed project includes a travel stop, which would provide professional truck drivers and motorists with 24-hour access to purchase gasoline, diesel, propane, electronics, snacks, travel items, and two fast-food restaurants, one with drive-thru. A dog park, RV dump station, bioretention basins, truck, RV and automobile parking areas and landscaping/lighting are also proposed, along with a 10-space overnight RV park. Finish grading for the entire project site would be balanced onsite. The complete project site is shown in Figure 2-2. The site plan is shown on Figure 2-3 and project elevations and floor plans are shown on Figure 2-4 and Figure 2-5 respectively. Table 2-1 provides a summary of the proposed uses.

Project characteristics and design features are listed below and summarized in the following sections:

- a 12-position passenger vehicle fueling station;
- a 4-position truck fueling station;
- a combined 13,005-square foot (SF) convenience store and two fast-food options, approximately 25 ft in height; 7,943 SF would be convenience store, the smaller of the two fast food options would be 1,588 SF with 3,474 SF for the fast-food restaurant with drive-thru;
- a 5,000 SF dog park;
- a truck scale;
- an RV dump station;
- a 1,000-gallon propane tank;
- a 30,000-gallon below ground gasoline storage tank, including fuel delivery parking;
- four 12,000-gallon above-ground diesel storage tanks for truck fueling, including fuel delivery parking;
- a 20,000 two-compartment below ground split tank with 12,000 gallons of diesel for automobiles and 8,000 of premium unleaded for automobiles;

[1] STAA routes are those that trucks that are longer than 'CA legal' are allowed to travel on.

- a 20,000-gallon below ground diesel exhaust fluid storage tank;
- 70 standard truck parking spaces (all available for overnight parking), 53 automobile parking spaces, five RV parking spaces, three electric vehicle (EV) charging station spaces, three accessible parking spaces and 10 overnight RV parking spaces with full hookups (power, water, and sewer);
- on site lighting, consisting of high-mast LED fixtures and LED canopy lighting - 43' in truck areas and 33' in auto areas;
- high-rise sign (75 ft in height), and other directional signage;
- bicycle rack and bicycle parking (8 short term spaces and 2 long term spaces);
- trash compactor, recycling and grease collection bins;
- landscaping, hardscaping, pavement, and fencing;
- one 200,000-gallon fire water supply storage tank and associated booster pump;
- four stormwater bioretention basins between - 6,272 SF and 86,247 SF;
- rooftop solar panels and other sustainability features; and
- utility extensions for gas, water and sewer.

Table 2-1 Summary of Proposed Land Uses

Building/Use	Square Feet
Convenience Store	7,943
Fast-Food Counter	1,588
Fast-Food Restaurant (w/drive-through)	3,474
Dog Park	5,000
Landscaping area	142,650
Extension of Skyline Road (additional paved area)	77,805
Parking	**Number of Spaces**
EV Parking/Charging	3
Total Auto Parking (including 4 Accessible spaces)	53
RV Parking	5
Overnight RV Parking	10
Standard Truck Parking	70
Total	**141**

Source: Lane Engineers, Inc. 2024; adapted by Ascent 2024.

The project would include a 7,943-SF convenience store, one 1,588-SF fast-food option and another 3,474-SF fast-food restaurant with an external drive-through window. The convenience store and fast-food restaurants would occupy the same building, which would be located between the automobile and truck fueling stations and would be in the central portion of the project site. The area north and east of the building would include automobile parking, with overnight RV parking to the very north; and the western and southwestern portions of the project site would consist of parking spaces for trucks. The auto fueling bays and diesel fueling bays would be accessible by separate entry points and physically separated by the building housing the fast-food restaurant and convenience store. Underground gasoline storage tanks would be in the northwest corner of the project site and would consist of a 30,000-gallon tank for unleaded fuel, a 20,000-gallon split tank with 12,000 gallons of diesel for automobiles and 8,000 of premium unleaded for automobiles, and a 20,000-gallon diesel exhaust fluid tank for diesel exhaust fluid. Above-ground diesel storage tanks would be located in the same portion of the site and consist of four 12,000-gallon tanks to hold diesel.

Truck and automobile fueling bays would be covered by a canopy and would have a hydrologically isolated drainage system that discharges to an oil/water separator. The four above-ground storage tanks would include a concrete containment curb that would catch and retain fuel in the event of a fuel spill.

The proposed four stormwater bioretention basins would collect surface runoff from the project site (see Figure 2-3). Bioretention systems are designed to function in a manner similar to the physical, chemical, and biological processes in the natural environment. These systems capture runoff, promote infiltration and evapotranspiration, recharge groundwater, and remove nutrients, sediment, and heavy metals carried in stormwater.

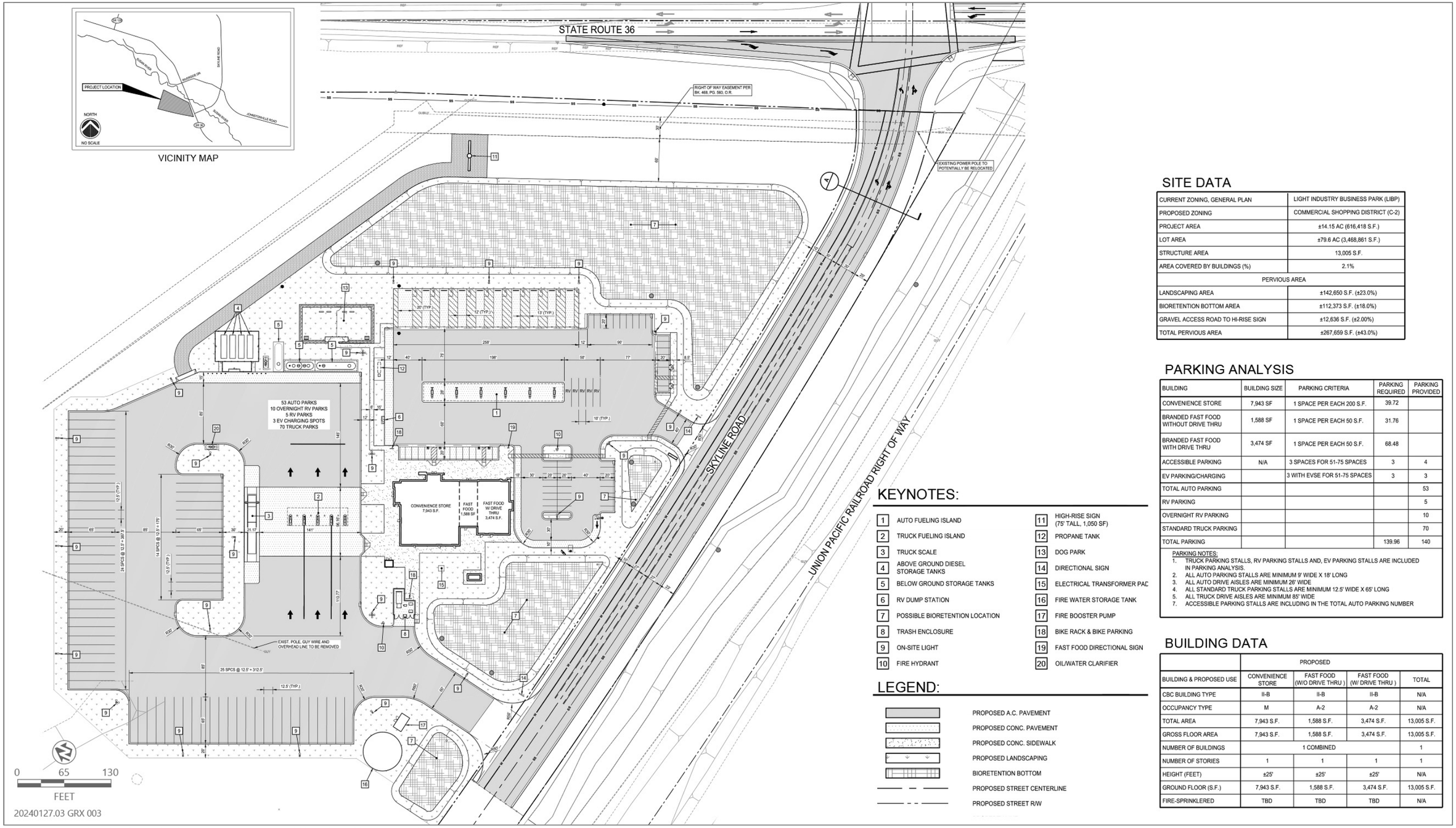
Landscaping would cover approximately 142,650 SF (23 percent) of the 14.15-acre project site. Landscaping would include native plants, xeriscaping, or other drought resistant plants, consistent with the Landscaping Regulations included in Chapter 17.96.040 of the City of Susanville Code of Ordinances. The landscape plan is shown in Figure 2-6.

The project would provide a total of 141 parking spaces, split into 70 standard truck parking spaces, 53 automobile parking spaces, five RV parking spaces, three EV charging station spaces, and 10 overnight RV parking spaces; four of the automobile spaces would be accessible per the requirements of the Americans with Disabilities Act (ADA). Overnight truck parking would be available in all truck spaces; however, idling of trucks would be limited to no more than five minutes, consistent with California Air Resources Board (CARB) requirements.

With regard to the high-rise sign, due to the nature of the development (a truck stop serving large semi-trucks), it is imperative that adequate visibility is achieved at a safe distance which allows truck drivers to plan their maneuver and exit SR 36 to turn into the site. Information contained in United States Sign Council (USSC) guidance notes that at 50 miles per hour, the rate at which the viewing distance decreases is 88 feet per second (USSC Foundation 2015). Because of this rapidly decreasing window of viewing opportunity, roadside sign design, and its height, is critical to traffic safety. Driving northbound on SR 36 from Johnstonville, the speed limit is 55 mph until approximately 500 ft from the SR 36/Skyline Road intersection and is 50 mph southbound on SR 36 from Susanville, thus at those speeds it is critical the sign is of sufficient height to allow safe vehicle maneuvering. As such, the project applicant is seeking a Conditional Use Permit for the 75 ft sign height.

In terms of sustainability features, the project's building energy-efficient features would include, but would not be limited to, water-efficient landscape design, high-efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use. The project would include solar panels which would be installed in accordance with the California Energy Code requirements and would produce an estimated 51,000 kWh/year, along with the three EV charging spaces mentioned previously, which would be provided in accordance with the CALGreen code. The project would provide bicycle facilities that would meet or exceed the respective CALGreen code.

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KEYNOTES:

1	AUTO FUELING ISLAND	11	HIGH-RISE SIGN (75' TALL, 1,050 SF)
2	TRUCK FUELING ISLAND	12	PROPANE TANK
3	TRUCK SCALE	13	DOG PARK
4	ABOVE GROUND DIESEL STORAGE TANKS	14	DIRECTIONAL SIGN
5	BELOW GROUND STORAGE TANKS	15	ELECTRICAL TRANSFORMER PAD
6	RV DUMP STATION	16	FIRE WATER STORAGE TANK
7	POSSIBLE BIORETENTION LOCATION	17	FIRE BOOSTER PUMP
8	TRASH ENCLOSURE	18	BIKE RACK & BIKE PARKING
9	ON-SITE LIGHT	19	FAST FOOD DIRECTIONAL SIGN
10	FIRE HYDRANT	20	OIL/WATER CLARIFIER

LEGEND:

- PROPOSED A.C. PAVEMENT
- PROPOSED CONC. PAVEMENT
- PROPOSED CONC. SIDEWALK
- PROPOSED LANDSCAPING
- BIORETENTION BOTTOM
- PROPOSED STREET CENTERLINE
- PROPOSED STREET R/W

SITE DATA

CURRENT ZONING, GENERAL PLAN	LIGHT INDUSTRY BUSINESS PARK (LIBP)
PROPOSED ZONING	COMMERCIAL SHOPPING DISTRICT (C-2)
PROJECT AREA	±14.15 AC (616,418 S.F.)
LOT AREA	±79.6 AC (3,468,861 S.F.)
STRUCTURE AREA	13,005 S.F.
AREA COVERED BY BUILDINGS (%)	2.1%
PERVIOUS AREA	
LANDSCAPING AREA	±142,650 S.F. (±23.0%)
BIORETENTION BOTTOM AREA	±112,373 S.F. (±18.0%)
GRAVEL ACCESS ROAD TO HI-RISE SIGN	±12,636 S.F. (±2.00%)
TOTAL PERVIOUS AREA	±267,659 S.F. (±43.0%)

PARKING ANALYSIS

BUILDING	BUILDING SIZE	PARKING CRITERIA	PARKING REQUIRED	PARKING PROVIDED
CONVENIENCE STORE	7,943 SF	1 SPACE PER EACH 200 S.F.	39.72	
BRANDED FAST FOOD WITHOUT DRIVE THRU	1,588 SF	1 SPACE PER EACH 50 S.F.	31.76	
BRANDED FAST FOOD WITH DRIVE THRU	3,474 SF	1 SPACE PER EACH 50 S.F.	68.48	
ACCESSIBLE PARKING	N/A	3 SPACES FOR 51-75 SPACES	3	4
EV PARKING/CHARGING		3 WITH EVSE FOR 51-75 SPACES	3	3
TOTAL AUTO PARKING				53
RV PARKING				5
OVERNIGHT RV PARKING				10
STANDARD TRUCK PARKING				70
TOTAL PARKING			139.96	140

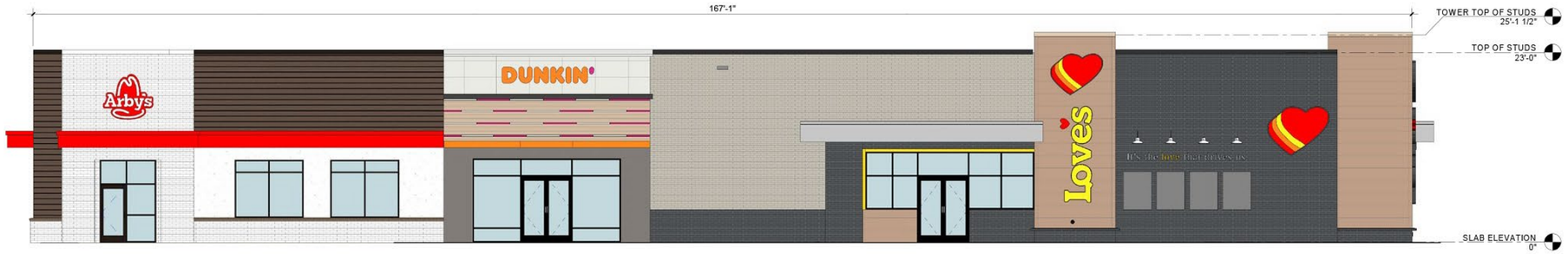
PARKING NOTES:
1. TRUCK PARKING STALLS, RV PARKING STALLS AND, EV PARKING STALLS ARE INCLUDED IN PARKING ANALYSIS
2. ALL AUTO PARKING STALLS ARE MINIMUM 9' WIDE X 18' LONG
3. ALL AUTO DRIVE AISLES ARE MINIMUM 26' WIDE
4. ALL STANDARD TRUCK PARKING STALLS ARE MINIMUM 12.5' WIDE X 65' LONG
5. ALL TRUCK DRIVE AISLES ARE MINIMUM 85' WIDE
7. ACCESSIBLE PARKING STALLS ARE INCLUDING IN THE TOTAL AUTO PARKING NUMBER

BUILDING DATA

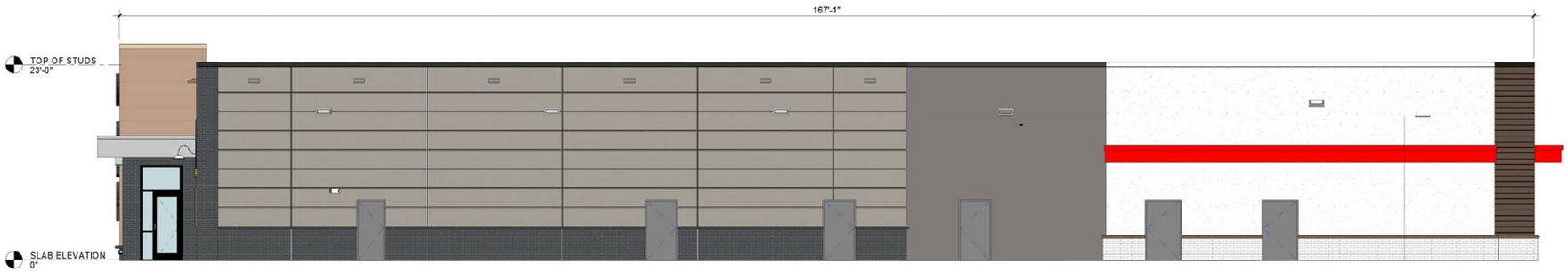
	PROPOSED			
BUILDING & PROPOSED USE	CONVENIENCE STORE	FAST FOOD (W/O DRIVE THRU)	FAST FOOD (W/ DRIVE THRU)	TOTAL
CBC BUILDING TYPE	II-B	II-B	II-B	N/A
OCCUPANCY TYPE	M	A-2	A-2	N/A
TOTAL AREA	7,943 S.F.	1,588 S.F.	3,474 S.F.	13,005 S.F.
GROSS FLOOR AREA	7,943 S.F.	1,588 S.F.	3,474 S.F.	13,005 S.F.
NUMBER OF BUILDINGS	1 COMBINED			1
NUMBER OF STORIES	1	1	1	1
HEIGHT (FEET)	±25'	±25'	±25'	N/A
GROUND FLOOR (S.F.)	7,943 S.F.	1,588 S.F.	3,474 S.F.	13,005 S.F.
FIRE-SPRINKLERED	TBD	TBD	TBD	N/A

Source: Image produced and provided by Lane Engineers, Inc. in 2024; adapted by Ascent in 2025.

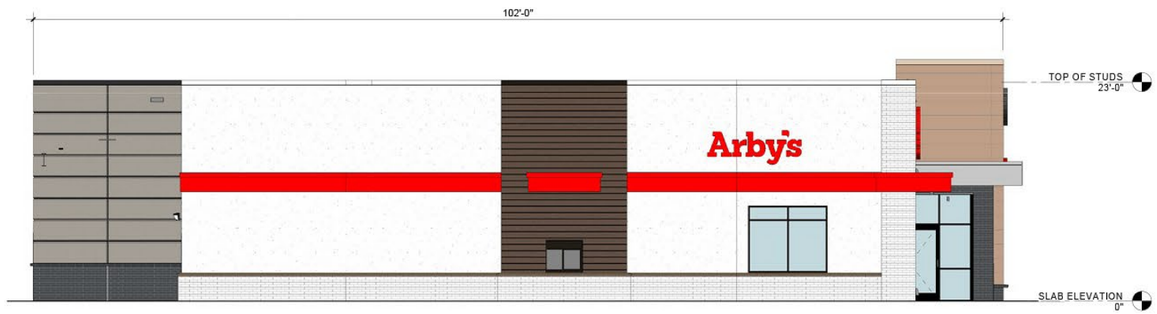
Figure 2-3 Site Plan



1 FRONT ELEVATION
1/8" = 1'-0"



2 REAR ELEVATION
1/8" = 1'-0"



3 LEFT ELEVATION
1/8" = 1'-0"

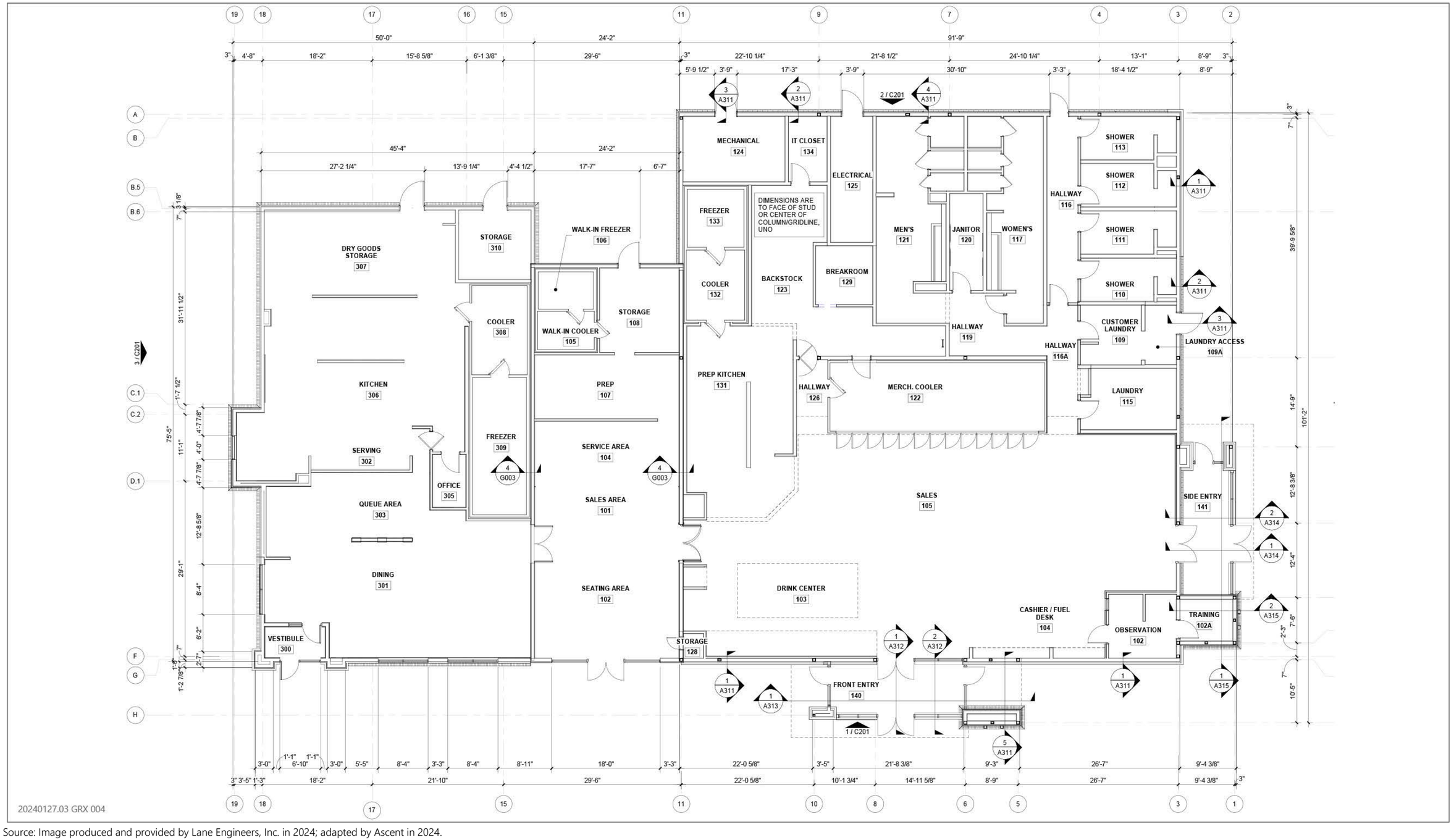


4 RIGHT ELEVATION
1/8" = 1'-0"

20240127.03 GRX 005

Source: Image produced and provided by Lane Engineers, Inc. in 2024; adapted by Ascent in 2024.

Figure 2-4 Building Elevations



Source: Image produced and provided by Lane Engineers, Inc. in 2024; adapted by Ascent in 2024.

Figure 2-5 Floor Plan



Source: Sierra Designs, Inc. 2025

Figure 2-6 Landscape Plan

2.3.1 General Plan Designation and Zoning

The current Lassen County General Plan and Area Plan Land Use designation for the project site, which is within the Susanville Vicinity Area Plan area, is Industrial Park. The Industrial Park designation is for limited industrial uses to be designed and laid out as a planned development with on-site services. The project applicant proposes that the City amend the General Plan to show a Commercial Shopping Center designation on the property. The Lassen County General Plan and Susanville Vicinity Area Plan area indicates principal land use designations and typical zoning districts or combinations of zoning districts which correspond to the designations. The project site has a typical corresponding zoning district of Limited Industrial District (M-L). The project applicant proposes that the City amend the zoning to show a General Commercial Shopping District (C-2) designation on the property.

2.3.2 Annexation into City of Susanville

Currently the project site is adjacent to, and outside the city limits, but within the City's approved Sphere of Influence (Figure 2-7). The site is thus within the "probable physical boundaries" of the City as it is expected to be expanded in the future, as previously determined by the Lassen County Local Agency Formation Commission (LAFCO; see Government Code Section 56076 ["'sphere of influence' means a plan for the probable physical boundaries and service area of a local agency, as determined by the commission"]). As part of the package or regulatory approvals required for the proposed project, the project applicant is requesting that LAFCO approve the annexation of the site into the City of Susanville City Limits, which would take the site out of the current land use planning jurisdiction of Lassen County.

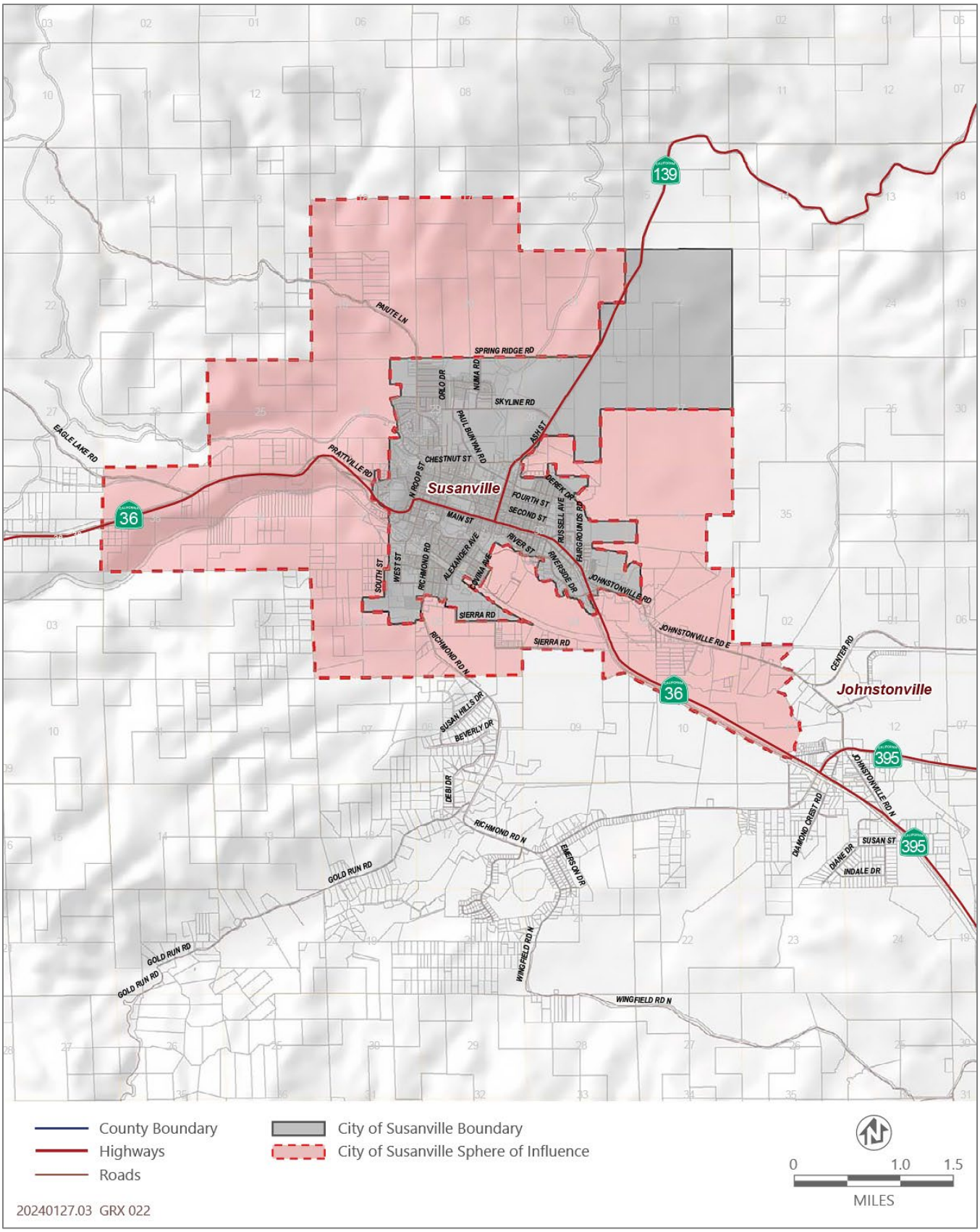
The City of Susanville is the lead agency for processing the proposed annexation with LAFCO, which would act as a responsible agency. LAFCO policies require that the annexation cannot be approved unless it is consistent with the City's General Plan and Sphere of Influence.

The project proposes a General Plan Amendment from the existing Industrial Park General Plan designation to *"General Commercial/Shopping Center"* designation and to change the current County zoning of Limited Industrial District (M-L) to a City C-2 (General Commercial/Shopping Center District) designation. The City Manager has advised the project applicant that the proposed project would be consistent with these designations.

The General Commercial/Shopping Center General Plan designation "provides a wide range of facilities for the sale of goods and provision of personal services." When the designation is applied "along thoroughfares it will permit a variety of commercial uses including … fast food and drive-through restaurants or food service, restaurants, … service stations, … and similar uses." (Susanville General Plan, Land Use and Community Design Element.)

The City Manager has determined that a truck and travel stop is allowed in a C-2 Zoning District with the issuance of a Use Permit through the City of Susanville City Council, which acts as the City's Planning Commission, per Ordinance 25-1048. Although the list of conditionally permitted uses within the C-2 zone does not expressly mention a truck and travel stop, section 17.36.030 of the City's Municipal Code does include the following similar uses: "Service station"; "Fast food restaurant, including drive-in and drive-through restaurants, [and] drive-through establishments"; "Recreation vehicle park"; and "Any shopping center 80,000 square feet or larger in size (includes all buildings within the shopping center)." Moreover, section 17.36.040 of the City's Municipal Code provides that the C-2 district permits "Other uses permitted in the C-2 district are uses found to be similar in character and impact to those listed in Sections 17.36.020 and 17.36.030 as determined by the community development director." Given that the proposed project includes specific components that section 17.36.030 expressly authorized as conditionally permitted uses, the City Manager has determined pursuant to section 17.36.040 that the overall proposed project is "similar in character and impact" to those specifically enumerated land uses.

The proposed General Plan and zoning amendments would ensure the project is consistent with the City's land use designation and zoning district.



Source: Lassen Local Agency Formation Commission 2017.

Figure 2-7 Susanville Sphere of Influence

2.3.3 Offsite Improvements

The project would include a variety of offsite improvements, including highway and street improvements and transitions, drainage facility connections, utility connections, and landscaping.

Highway Improvements

The existing SR 36/Skyline Road signalized intersection would be altered through extending Skyline Road 1,191 feet to the west as a two lane road, to the westerly site access (solely for trucks). The end point of the road would be closed to traffic but left so that the future Skyline Road extension would not be precluded. The new western 'arm' of Skyline Road would have a dedicated central left turn lane onto SR 36 (northbound) and a combined through traffic and right turn lane onto Skyline Road and SR 36 (southbound), respectively (See Figure 2-3). From the north on SR 36 (southbound), the intersection would be altered to include a right exit lane towards the new Skyline Road 'arm' and restriped to include a dedicated left turn lane onto Skyline Road east and a dedicated through traffic lane. From the south on SR 36 (northbound), the intersection would be restriped to include a dedicated left turn lane on the new Skyline Road 'arm' to go with the existing through traffic and right turn lanes.

Skyline Road to the east of the existing junction would also be restriped to include a dedicated left turn lane on SR 36 (southbound), a right turn lane onto SR 36 (northbound) and a through traffic lane onto the new Skyline Road 'arm'.

Utilities

The City of Susanville currently provides water and natural gas services to the city, the Susanville Sanitation District serves the city sewer, and electricity is provided by Lassen Municipal Utility District (LMUD). Utilities would generally be brought to the site via a trench within the outer limits of the City/Caltrans right-of-way. Utilities such as water and gas would be brought to the site from Johnstonville Road via Skyline Road, on the west side of the road (Figure 2-8). The gas and water lines would be trenched either side of the Susan River but would be pumped through a pipe that would be hung from the side of the bridge on Skyline Road over the Susan River.

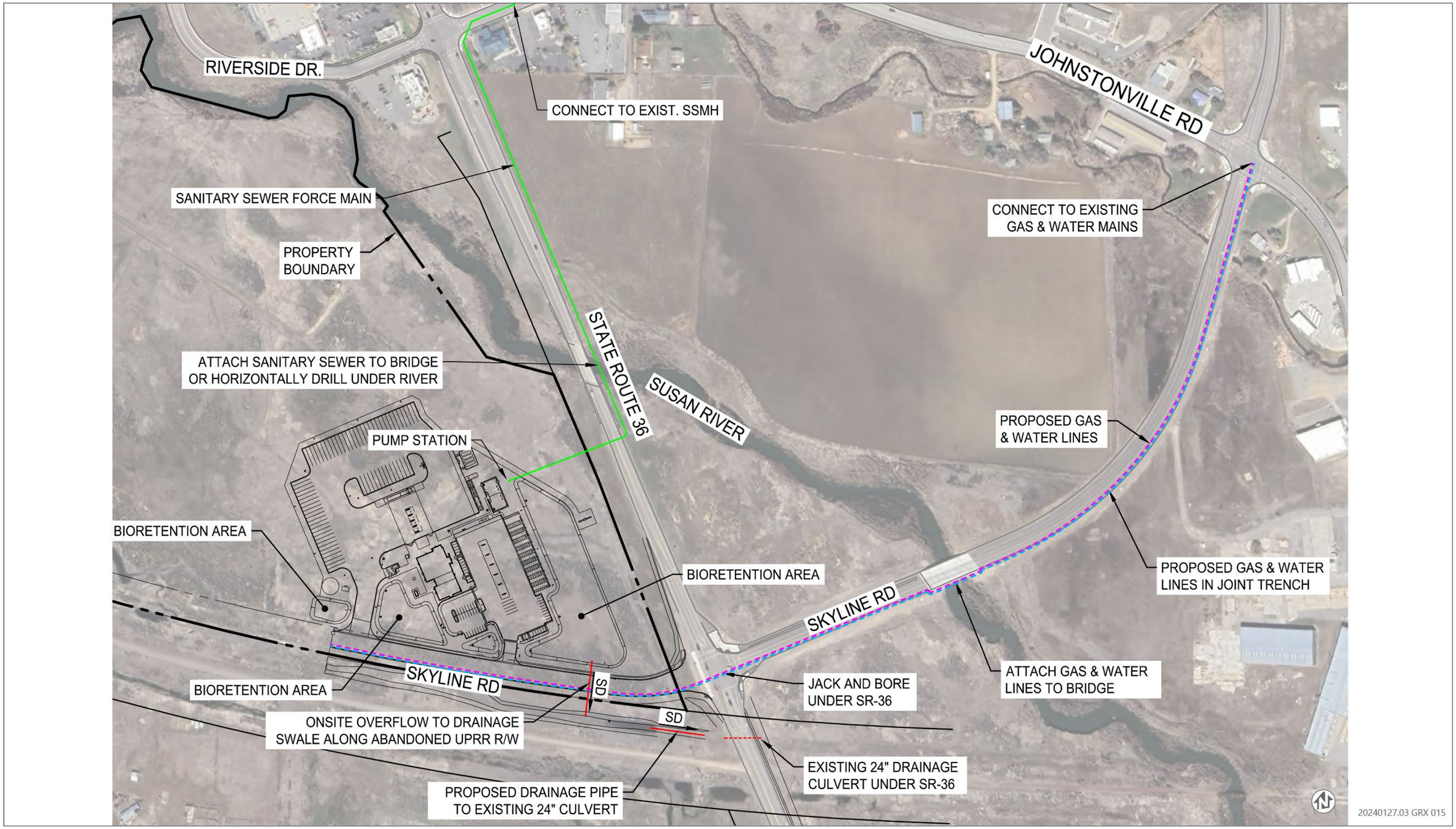
The sewer line route would be approximately 1,800 ft in length and would connect from the site at a point approximately 600 ft north from the SR 36/Riverside Drive intersection and would be bored under the Caltrans right-of-way from the west side of SR 36 to the east side of SR 36. The sewer would then be trenched either side of the Susan River but, with Caltrans permission and an encroachment permit in accordance with Caltrans standards, would be pumped through a pipe that would be hung from the eastern (downstream) side of the SR 36 bridge over the Susan River (Bridge 7-33), before tying in to the existing sanitary sewer manhole at the SR 36/Riverside Drive intersection (Figure 2-8). Per discussion between the City and the Susanville Sanitary District, the District has requested to submit a joint annexation application to LAFCO with the City of Susanville. Upon finalization of sewer construction, the District has issued a statement of intent to take ownership and operate the sewer line (Appendix J).

During operation, the travel stop would have an estimated water demand of approximately 7,000 to 9,000 gallons per day (gpd) or 7.8 to 10.1 acre-feet per year (AFY), which would be delivered to the site via the new water line (Figure 2-8). Stormwater would be drained toward the four onsite bioretention facilities (shown in Figure 2-3) with any overflow draining to the drainage swale alongside the abandoned railroad right-of-way, before connecting with the existing 24-inch culvert under SR 36 (Figure 2-8).

Existing overhead electrical lines are located along Skyline Road and adjacent to SR 36 and those that are within the construction footprint would be relocated prior to construction and the project site would tie-in to these.

The project site is within Frontier Communications service area. Frontier Communications is anticipated to have adequate service and facilities to meet the requirements of the project and would be able to provide telephone and data services for the project with minimal installation requirements (Frontier 2025).

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Source: Image produced and provided by Lane Engineers, Inc. in 2024; Adapted by Ascent in 2025.

Figure 2-8 Proposed Offsite Utilities

2.3.4 Project Construction

Construction equipment anticipated to be used throughout the various phases of construction includes:

- air compressors,
- backhoes,
- compacters,
- concrete/industrial saws,
- excavators,
- forklifts,
- graders,
- pavers,
- paving equipment,
- rollers,
- scrapers, and
- water trucks.

Construction is anticipated to begin in Q3 2026 and last approximately 12 months. Construction activities would occur Monday through Friday, during daytime hours (typically 8 a.m.– 5 p.m.). Table 2-2 provides an overview of the phases of construction that would occur. A short demolition phase would be required to remove existing underground utility lines.

Table 2-2 Anticipated Construction Phasing

Sub-Phase Number	Sub-Phase Name	Approximate length of Sub-Phase
1	Demolition	1 month
2	Site Prep	1 month
3	Finish Grading	1 month
4	Underground	2 months
5	Building Construction	5 months
7	Paving	1 month
8	Architectural Coating	1 month

Source: Data provided by Lane Engineers, Inc. in 2024; adapted by Ascent 2024.

2.3.5 Project Operations

The anticipated opening year for the project is 2027. The proposed travel stop would be open 24 hours per day, seven days per week, and is designed to accommodate parking of up to 70 trucks, 56 automobiles (including EV charging and accessible spaces) and 15 RVs onsite at any given time. In terms of employment, the total minimum number of employees daily would be approximately 27 employees located on the travel stop site at one time, consisting of 12 total employees daily (3 shifts/day) for Convenience Store and Auto and Truck Fueling and 15 total employees daily (3 shifts/day) for the Fast-Food Restaurants (with drive-thru).

The travel stop would receive approximately 3-4 gasoline deliveries and 12-14 diesel deliveries per week. It is anticipated that there will be approximately 1-3 small deliveries per day for the convenience store, and approximately 2 deliveries per week for the restaurants. As described previously, diesel fuel would be stored onsite in above-ground storage tanks, and gasoline, and diesel exhaust fluid would be stored onsite in below-ground storage tanks. Total annual fuel throughput for the travel stop is planned to be 2,500,000 gallons of diesel fuel and 2,800,000 gallons of gasoline.

Access to the travel stop facility would be via two ingress/egress drives along the newly paved Skyline Road. The northern driveway (40 feet wide) along Skyline Road would be dedicated for the use of automobiles and RVs while the southern driveway (60 feet wide) would be dedicated for trucks only. The northern ingress/egress drive from Skyline Road would provide access to auto fueling islands, the convenience store, the fast-food restaurants, the dog park, parking areas, the RV dump station, propane tank, and the RV overnight parking spaces; the southern ingress/egress drive would provide access to truck fueling stations, scales, and parking areas. Onsite truck travel lanes are proposed to be 85 feet wide and vehicular travel lanes are proposed to be 30 feet wide. Site access points are depicted in Figure 2-3.

2.4 REQUIRED DISCRETIONARY ACTIONS AND PERMITS

The project site is currently located within the unincorporated territory of Lassen County, but within the approved Sphere of Influence of the City of Susanville. As part of the package of regulatory approvals needed for the proposed project, the City is proposing that LAFCO approve the annexation of the property into the City's boundaries. To the extent that the City would be granting approvals in advance of such action by LAFCO, those City approvals would be conditional on the ultimate action of LAFCO approving the annexation:

- City of Susanville - EIR certification
- City of Susanville - conditional use permit (for 75-foot sign)
- City of Susanville - architectural and site plan review
- City of Susanville - general plan amendment and prezoning/zone change (with annexation)
- City of Susanville/ Susanville Sanitary District/Lassen Local Agency Formation Commission - annexation processing
- Lahontan Regional Water Quality Control Board - National Pollutant Discharge Elimination System construction stormwater permit
- Lassen County – permit to operate retail food facility
- Lassen County – planning and building service department permit to operate
- California Department of Housing and Community Development - HCD MP 500 permit to operate special occupancy RV park
- Caltrans - encroachment permit for work within the SR 36 ROW and for review and approval of utility installations on existing bridges
- Caltrans - transportation permit for oversized/overweight vehicles (may not be required)
- CDFW - Lake and Streambed Alteration Agreement

2.4.1 Project Design Features

The above sections identify general characteristics of the project upon which the analyses of this Initial Study are based. In addition to these project characteristics, the City proposes to implement Project Design Features (PDFs) that specifically relate to environmental considerations. The PDFs would be included in the Mitigation Monitoring and Reporting Program (MMRP) required in association with certification of the Final EIR.

- PDF-AES-1: Outdoor lighting. Proposed lighting will include safety lighting; lighting of pedestrian routes to aid security/surveillance; decorative lighting for landscaping; and lighting to highlight entrances. All lighting will be installed in accordance with applicable Backlight-Uplight-Glare (BUG) standards established by either the Illuminating Engineering Society of North America (IESNA) and/or CALGreen code requirements related to light pollution reduction. General lighting design principles will be sensitive to environmental issues associated with external lighting, such as using energy-efficient lighting and shielding to minimize light trespass. Light will be placed where it is needed, limiting light pollution; site-wide controls, such as astronomical timeclocks and photocells, may be used to switch off lighting when it is no longer in use.
- PDF-AES-2: Non-Reflective Glazing: Glass used in building façades will be anti-reflective or treated with an anti-reflective coating in order to minimize glare (e.g., minimize the use of glass with mirror coatings) and, as recommended by the New York City Audubon Society, minimize bird-strike. Consistent with applicable energy and building code requirements, including Section 140.3 of the California Energy Code as may be amended, glass with coatings required to meet the Energy Code requirements will be permitted.

- PDF-TR-1: Construction Management and Traffic Plan. A Construction Management and Traffic Plan (CMTP) in accordance with Caltrans Transportation Management Plan (TMP) Guidelines will be developed by the contractor and approved by the City of Susanville to alleviate potential construction period transportation impacts. The Plan would include but not necessarily be limited to:
  - name and telephone number of a contact person regarding traffic complaints or emergency situations;
  - community notification procedures and contact information for local police, fire, and emergency response organizations and procedures for the continuous coordination of construction activity;
  - procedures for training the flag person(s) used in implementing the plan;
  - the location, times, and estimated duration of any temporary lane closures;
  - developing, and once approved, managing the haul route plan and construction parking management plan;
  - timing of disruptive construction activities; scheduling of deliveries, pick-ups and hauling of material during non-peak travel periods to the extent possible;
  - the contractor will provide an estimate of truck volume and schedule. Areas will be designated by the city for the staging of all trucks. All earth-moving and ready-mix trucks will be equipped with two-way radios so that the drivers at the staging areas are linked to a person controlling traffic at the project site. Trucks will follow a city-approved route to the project site.

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3 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

APPROACH TO THE ENVIRONMENTAL ANALYSIS

This draft environmental impact report (Draft EIR) evaluates and discloses the environmental impacts associated with the Susanville Travel Stop Project (proposed project), in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000, et seq.) and the State CEQA Guidelines (California Code of Regulation, Title 14, Chapter 3, Section 1500, et seq.).

Sections 3.1 through 3.10 of this Draft EIR each include the following components:

- **Regulatory Setting:** This subsection presents information on the laws, regulations, plans, and policies that relate to the issue area being discussed. Regulations originating from the federal, state, and local levels are each discussed as appropriate.
- **Environmental Setting:** This subsection presents the existing environmental conditions on the project site and in the surrounding area as appropriate, in accordance with State CEQA Guidelines Section 15125. The discussions of the environmental setting focus on information relevant to the issue under evaluation. The extent of the environmental setting area evaluated (the project study area) differs among resources, depending on the locations where impacts would be expected. For example, air quality impacts are assessed for the air basin and the site vicinity, while geology, soils, and mineral resources impacts are assessed for the project site only.
- **Environmental Impacts and Mitigation Measures:** This subsection presents thresholds of significance and discusses significant and potentially significant effects of the proposed project on the existing environment, including the environment beyond the project boundaries, in accordance with State CEQA Guidelines Section 15126.2. The methodology for impact analysis is described, including technical studies upon which the analyses rely. The thresholds of significance are defined and thresholds for which the project would have no impact are disclosed and dismissed from further evaluation. Project impacts and mitigation measures are numbered sequentially in each subsection (Impact 3.2-1, Impact 3.2-2, Impact 3.2-3, etc.). A summary impact statement precedes a more detailed discussion of each environmental impact. The discussion includes the analysis, rationale, and substantial evidence on which conclusions are based. The determination of level of significance of the impact is presented in bold text. A "less-than-significant" impact is one that would not result in a substantial adverse change in the physical environment. A "potentially significant" impact or "significant" impact is one that would result in a substantial adverse change in the physical environment; both are treated the same under CEQA in terms of procedural requirements and the need to identify feasible mitigation. Potentially feasible mitigation measures are identified to avoid, minimize, rectify, reduce, or compensate for significant or potentially significant impacts, in accordance with the State CEQA Guidelines Section 15126.4. Unless otherwise noted, the mitigation measures presented are recommended in the EIR for consideration by City decisionmakers to adopt as conditions of approval or other enforceable measures.

  Where an existing law, regulation, or permit specifies mandatory and prescriptive actions about how to fulfill the regulatory requirement as part of the project definition, leaving little discretion in its implementation, and would avoid an impact or maintain it at a less-than-significant level, the environmental protection afforded by the regulation is considered before determining impact significance. Where existing laws or regulations specify a mandatory permit process for future projects, performance standards without prescriptive actions to accomplish them, or other requirements that allow substantial discretion in how they are accomplished, or have a substantial compensatory component, the level of significance is determined before applying the influence of the regulatory requirements. In this circumstance, the impact would be potentially significant or significant, and compliance with the regulatory requirements would be included as a mitigation measure.

  This subsection also describes whether mitigation measures would reduce project impacts to less-than-significant levels. Significant-and-unavoidable impacts are identified as appropriate in accordance with State CEQA

Guidelines Section 15126.2(b). Significant-and-unavoidable impacts are also summarized in Chapter 6, "Other CEQA Sections."

The full references associated with the references cited in Sections 3.1 through 3.10 are presented in Chapter 8, "References," organized by chapter or section number.

EFFECTS FOUND NOT TO BE SIGNIFICANT

The State CEQA Guidelines (Section 15128) allow an EIR to briefly describe the reasons why some environmental effects were determined not to be significant and then to dismiss these effects from detailed review in the EIR. Implementing the proposed project would not result in significant effects related to the issue areas described below. These issue areas are dismissed from detailed review in this EIR. They are organized below based on the order of topics in the State CEQA Guidelines Appendix G Environmental Checklist Form:

- **Aesthetics** (Substantially damage scenic resources in a state scenic highway, in an urbanized area conflict with applicable zoning and other regulations governing scenic quality, and create a new source of substantial light or glare): The project site is not located along a state-designated scenic highway. According to the California State Scenic Highway System Map (Caltrans 2018), the closest designated scenic highway is the Volcanic Legacy Scenic Byway, located 6.3 miles east of the project site. Due to distance and intervening structures, there would be no impact on the Volcanic Legacy Scenic Byway and no impact on any officially designated scenic highway as there are none in the project site's vicinity. Therefore, this topic will not be discussed further in the EIR.

  The project is located in a non-urbanized area; CEQA Guidelines Section 15387 defines "urbanized area" as "a central city or a group of contiguous cities with a population of 50,000 or more, together with adjacent densely populated areas having a population density of at least 1,000 persons per square mile", which is substantially less than the population of Susanville. Thus, the threshold *If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality* does not apply. Therefore, this topic will not be discussed further in the EIR.

  Regarding new light which would adversely affect day or nighttime views in the area, construction activities would be short-term and would generally occur during daytime hours. If security lighting is needed, it would be shielded and projected downward to minimize spillover effects on adjacent roadways, in accordance with City of Susanville Code of Ordinances Section 17.96.050, Lighting. During operation, according to the project's photometrics plan (Figure 3.1-5), lighting levels would be 1 footcandle (10.76 lux) or less at the edges of the project site, before fading to 0.0 footcandles at the SR 36 right-of-way and by the former railroad embankment, at a distance of approximately 80 to 100 ft from the edge of the Project site. For comparison, 1 footcandle is approximately equal to twilight conditions and 0.1 footcandle is approximately equal to deep twilight conditions. As such, lighting levels would not be so bright as to cause substantial light that would adversely affect nighttime views from nearby sensitive receptors. Applicable Backlight-Uplight-Glare (BUG) standards established by either the Illuminating Engineering Society of North America (IESNA) or CALGreen code requirements related to light pollution reduction (see CALGreen 2022, Chapter 5, Section 5.106.8) would be adhered to, per Project Design Feature PDF-AES-1. In terms of automobile and truck headlights and associated light spill, due to the former railroad embankment being at an elevation approximately 6 ft greater than the site elevation, the orientation of the site plan, and intervening on site structures, there should not be any greater light spill than is currently experienced with vehicles travelling on SR 36 and Skyline Road. With regard to glare, construction equipment and vehicles would be temporarily present within the project site, although glare from these surfaces would be minor and would not adversely affect daytime views. During operation, the project would not include building materials or surfaces that would create substantial sources of glare. Any glass fenestration incorporated into the project's components would be designed with low-reflectivity values (no mirror-like tints or films), as recommended by the New York City Audubon Society (2007) to minimize glare and bird-strike as specified in PDF-AES-2; and additionally, adherence to Chapter 5, Section 5.106.8.2 of the CALGreen code would aid minimizing off-site glare. Therefore, less than significant impacts are anticipated, and this topic will not be discussed further in the EIR.

- Agriculture and Forestry Resources (all topics): The project site is located on a vacant parcel that is designated as Industrial Park in the City's General Plan and pre-zoned Limited Industrial District (M-L). The 1984 Susanville Vicinity Area Plan (the document) identified the site on the agricultural land use map as pasture land (mixed and native) and identified the (then) existing land use as agriculture (Lassen County 1984). However, the Susanville Vicinity Area Plan itself (the figure/plan), adopted by the Lassen County board of supervisors on December 4, 1984, designated the site as Industrial Park. Thus, the planning intent for the site was to be developed with industrial uses. There are no agricultural lands (including lands classified by the California Natural Resources Agency as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance) or forest lands mapped within or in proximity to the project site (DOC 2022); however, that's partly due to Lassen County being unmapped by the California Department of Conservation Farmland Mapping and Monitoring Program (FMMP). With the lack of available FMMP data, the site's land use designations in City/County documents was used for analytical purposes to determine if agricultural lands would be converted as a result of the proposed Project. In addition, a public comment (i.e. from an individual) on the NOP noted that the land was prime farmland if irrigated. Although according to the U.S. Department of Agriculture's Natural Resources Conservation Service (NRCS; USDA 2025), the land classification for the project site is classed as 'Prime Farmland if irrigated' and assigned a capability class of 2e, the land is also classified under the nonirrigated capability class as class 6. Class 2 soils have moderate limitations that reduce the choice of plants or that require moderate conservation practices. The letter "e" shows that the main hazard is the risk of erosion unless close-growing plant cover is maintained. Class 6 soils have severe limitations that make them generally unsuitable for cultivation and that restrict their use mainly to pasture, rangeland, forestland, or wildlife habitat. Typically, with soil surveys, the soil is placed in the capability class equal to the most limiting factor (Neitsch et al. 1997). Furthermore, per the DOC's Important Farmland Categories (DOC 2025), to be included as prime farmland, land must have been used for irrigated agricultural production at some time during the four years prior to mapping. The site survey for the Susanville Area was undertaken in 1987 (USDA 2004). In further review of historic mapping, at no time between 1981 and 2025 has the site been used for irrigated agricultural production, although it was previously used for cattle grazing. Per the Lassen County NOP comment letter (see Appendix A), the County has no record of any wells on site, demonstrating the lack of irrigation. Thus, the nonirrigated capability class 6 appears to be the more appropriate soil classification for the site. Additionally, while NRCS' web soil survey provides a preliminary indication of soil properties, a project specific geotechnical report is more accurate. As discussed in the Initial Study, a site-specific geotechnical investigation was undertaken, which undertook 13 borehole drillings across the project site (see Appendix A). The geotechnical exploration was more consistent with the geologic map description (Quaternary Lake Deposits) rather than the soil survey descriptions provided by NRCS, as borehole drilling at the site indicated near surface deposits are composed primarily of 5 to 15 feet of medium- to high-plasticity clays and silts with lesser layers of interbedded silty sand and sand/silt and thus the sandy loam NRCS identified for the site was not the predominant soil type encountered. Therefore, less than significant impacts on agriculture and forestry resources are anticipated, and this topic will not be discussed further in the EIR.
- Air Quality (conflict with or obstruct implementation of the applicable air quality plan, and result in other emissions): The project site is located in the Northeast Plateau Air Basin (NEPAB) which is currently designated as in attainment for all pollutants for federal and state standards. Typically, projects that propose development that is consistent with the growth anticipated by the relevant general plan would be consistent with applicable air quality plans. In the event that a project would propose development which is less dense than anticipated within the general plan, the project would likewise be consistent with the applicable air quality plans. If a project proposes development that is greater than that anticipated in the general plan, the project would be in conflict with the applicable air quality plan. There are no applicable air quality plans in the region. The project proposes a General Plan Amendment of the current County land use designation from the existing Industrial Park General Plan designation to a City "General Commercial/Shopping Center" designation and to change the current County zoning of Limited Industrial District (M-L) to a City C-2 (General Commercial/Shopping Center District) designation. A truck and travel stop is allowed in a C-2 Zoning District with the issuance of a Use Permit through the City of Susanville Planning Commission. The proposed General Plan and zoning amendments would ensure the project is consistent with the City's land use designation and zoning district. As discussed in the

Transportation Impact Analysis (Appendix H), the majority of project trips (90 percent of truck trips, 85 percent of auto trips to the travel stop: 40 percent, of fast food restaurant trips, and 50 percent of RV trips) are expected to be pass-by trips (e.g., a trip already on the adjacent roadway that enters a commercial center en route to a different primary destination). Overall, the project is expected to generate 4,252 daily trips: 3,335 of these are expected to be pass-by trips, while 917 of these are expected to be new trips. Overall, the average trip length is equal to less than one mile per trip (4,252 daily trips, 4,072 daily VMT). This change in trip generation and VMT) would not be substantial because the majority of trips (estimated as 78 percent) would divert from SR-36. RV trip length VMT (75 miles) was based on half of trips originating/destined for Reno (84 miles one-way) and the other half originating/destined for the south entry/exit of Lassen National Park (67 miles). The Highway Performance Monitoring System estimates urbanized Susanville to have a VMT of 41.21 (Caltrans 2023). Thus, because the project is consistent with the land use designations, and the majority of the trips would be pass-by trips, the project would not conflict with the implementation of applicable air quality plans and would not facilitate further growth. Therefore, no impacts due to conflict with an applicable air quality plan are anticipated, and this topic will not be discussed further in the EIR.

With regard to other emissions (such as those leading to odors), as shown in the Initial Study (Appendix A), minor odors from the use of heavy-duty diesel equipment, and the laying of asphalt during project-related construction activities would be intermittent and temporary and would dissipate rapidly from the source with an increase in distance. During operation, odors would be generated from the operation of diesel-fueled delivery trucks and refueling by both passenger vehicles and trucks. These types of odor sources are no different from those that currently exist on CA-36, adjacent to the project site. Moreover, the project would be subject to Lassen County Air Pollution Control District (LCAPCD) Rule 4:02, "Nuisance" and 4:17, "Reduction of Odorous Materials" regarding the control odorous matter. As both project construction and operation are not anticipated to result in the frequent exposure of nearby sensitive receptors to substantial objectionable odors, no significant impacts would occur and this topic will not be discussed further in the EIR.

- Biological Resources (wildlife movement/wildlife corridor, conflict with local ordinance, and conflict with adopted habitat conservation plan): The study area is mapped as an area of limited connectivity opportunities and is outside any essential connectivity area (CDFW 2024). The Susan River and its associated riparian and aquatic habitats provide a potential corridor for movement within and across the study area for some aquatic and terrestrial species. However, the actual functions and values of the Susan River corridor for wildlife movement depend on several local and regional variables, including specific habitat requirements of species potentially using the corridor and habitat quality within the corridor, corridor size and dimensions, the types and magnitude of edge effects (from adjacent land cover and uses), and presence of movement barriers. For example, in the study area, the Susan River corridor and uplands are influenced by SR 36, commercial and residential developments, and agriculture; these disturbance factors limit the overall quality and functions of the Susan River corridor for wildlife movement. The proposed project would not alter the Susan River or any associated riparian and wetland habitats, and fish and other aquatic species could still move through the area within the river channel as they do under existing conditions. The former railroad embankment south of the project site would be unaffected by the proposed project which could potentially be used by wildlife, so the project would not create barriers to wildlife movement through the area and would not isolate or fragment any habitat areas. As such, wildlife corridors or any designated essential connectivity areas are not present within or in the immediate vicinity of the project site. No significant impacts would occur and this topic will not be discussed further in the EIR.

  Although the project site is vacant, the proposed project would not require the removal of any trees. In accordance with Section 12.36.110 of the Susanville Code of Ordinances, the applicant would be required to provide a "no tree" verification as part of the project application, which would be substantiated by an inspection of the site by the City prior to issuing grading permits. The proposed project would comply with all local policies and ordinances protecting biological resources. No significant impacts would occur and this topic will not be discussed further in the EIR.

According to CDFW (2023), there are no Natural Community Conservation Plans or Habitat Conservation Plans in Lassen County. Therefore, project implementation would have no impact to adopted biological plans. No significant impacts would occur and this topic will not be discussed further in the EIR.

- Cultural Resources (disturb human remains): As indicated within the Initial Study (Appendix A), the project site is relatively flat; nevertheless, the project would require excavation to a depth of approximately 10 feet that would extend into native soils, with the potential to encounter previously unknown human remains. A number of existing regulatory provisions mandate requirements for the handling of human remains inadvertently uncovered during excavation activities. These include State Health and Safety Code Section 7050.5, Public Resources Code Section 5097.98, and CEQA Guidelines Section 15064.5(e). Pursuant to these codes, in the event of the discovery of unrecorded human remains during construction, excavations shall be halted, and the County Coroner shall be notified. If the human remains are determined to be Native American, the California Native American Heritage Commission (NAHC) would be notified within 24 hours and the guidelines of the NAHC would be adhered to in the treatment and disposition of the remains. Compliance with these regulatory protocols would ensure that impacts on human remains would be less than significant and this topic will not be discussed further in the EIR.
- Energy (conflict with or obstruct state or local plan for renewable energy or energy efficiency): The project is designed in a manner that is consistent with and not in conflict with relevant energy conservation plans that are intended to encourage development that results in the efficient use of energy resources. The project would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the Title 24 standards and CALGreen Code. The project's energy-efficient features would include, but would not be limited to, water-efficient landscape design, high-efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; EV charging, EV capable and EV ready spaces; bicycle facilities that would meet or exceed the CALGreen or City codes (whichever is greater); Energy Star–labeled appliances, where possible; and energy-efficient and water conserving HVAC systems. The Project also includes an estimated 51,000 kWh/year solar Photovoltaic (PV) installation. Although the City of Susanville General Plan, which would be the operative document if the project is approved by the City and the annexation is approved by LAFCO does not contain energy-efficiency policies, the project would also be consistent with and not conflict with regional or local planning strategies that address energy conservation, such as the Lassen County Energy Element.

  With respect to operational transportation-related fuel usage, the project would not conflict with statewide efforts to improve transportation energy efficiency and reduce transportation energy consumption with respect to private automobiles. Additionally, the project would not significantly increase energy consumption in the area. There are nine existing gasoline dispensing facilities within two miles of the project site, so the project is unlikely to significantly induce transportation energy consumption. The project would also benefit from fuel and automotive manufacturers' compliance with CAFE fuel economy standards and the Pavley Standards, which are designed to result in more efficient use of transportation fuels. The project's design would comply with existing energy standards and incorporate features to reduce energy consumption, including the features discussed above. Therefore, the project would not conflict with energy conservation plans and impacts would be less than significant and this topic will not be discussed further in the EIR.
- Geology and Soils (earthquake fault, seismic ground shaking, liquefaction, landslides, soil erosion or the loss of topsoil, unstable geologic unit, expansive soil, and septic tanks/wastewater disposal): The Geotechnical Investigation Report (see Appendix A) notes the USGS Quaternary Faults map shows unnamed fault segments of the Susanville – Eagle Lake area approximately 1.5-miles west of the site. These Class A faults have undergone undifferentiated Quaternary movement with unspecified movement intervals. The Geotechnical Investigation Report notes no active faulting has been mapped beneath the project site. The project site does not lie within a designated Alquist Priolo Earthquake Fault Zone. Based on these considerations, the potential for surface ground rupture exists at the project site given the potentially active faults nearby. Nonetheless, the project will be designed with earthquake structural design components required by the California Building Code (CBC), in order to protect against significant cosmetic damage and serious economic loss, which in turn, would help protect health and safety of humans who may be in or near the building. Adherence to regulatory requirements would

reduce impacts related to earthquake faults and strong seismic shaking to a less than significant level and these topics will not be discussed further in the EIR.

The liquefaction analysis conducted as part of the Geotechnical Investigation Report (see Appendix A) noted that because the site subsurface sandy soils are unsaturated to 18 to 20 feet depth, and soils below 15 feet depth to 35 feet depth are primarily medium- to high-plasticity clays, the potential for liquefaction is minor to negligible. Therefore, impacts related to liquefaction and lateral spreading would be less than significant and these topics will not be discussed further in the EIR.

Given the flat terrain of the project site, impacts to seismically induced landslides would not occur. Therefore, no significant impacts due to landslides are anticipated, and this topic will not be discussed further in the EIR.

Soil erosion via wind would be minimized through soil stabilization measures required by Lassen County Air Pollution Control District Rule 4:18 – Fugitive Dust Emissions, such as applying asphalt, oil, water or suitable chemicals to dirt roads, material stockpiles, land clearing, excavation, grading or other surfaces which can give rise to airborne dusts. Potential for water erosion would be reduced by implementation of standard erosion control measures imposed during site preparation and grading activities. Construction activities would be carried out in accordance with applicable standard erosion control practices required pursuant to the CBC and the requirements of the National Pollutant Discharge Elimination System (NPDES) General Construction Permit issued by the Lahontan Regional Water Quality Control Board (RWQCB), as applicable. Consistent with these requirements, due to project construction activities resulting in one acre or more of land disturbance, a Stormwater Pollution Prevention Plan (SWPPP) would be prepared that incorporates BMPs to control erosion during the project's construction period. Any BMPs included as part of the SWPPP would thus be implemented as part of the project. Following project construction, the project site would be covered completely by paving, structures, and landscaping, and would generate little if any soil erosion. Thus, impacts due to erosion of topsoil would be less than significant, as the project would comply with applicable regulatory requirements and this topic will not be discussed further in the EIR.

The project would be constructed in conformance with the most recently adopted CBC, which includes provisions to reduce subsidence and collapse impacts, and would also be constructed according to applicable recommendations made in the Geotechnical Investigation Report prepared for the project. Therefore, subsidence and collapse impacts would be less than significant, and this topic will not be discussed further in the EIR.

The Geotechnical Investigation Report determined expansive clays will require separation from footings and pavements by at least 2 feet of compacted granular fill, including the thickness of aggregate base and subbase layers. Nonetheless, to ensure that the proposed development would not experience structural damage due to expansive soil, the project would be designed and constructed in conformance with the most recently adopted CBC. Therefore, impacts related to expansive soils would be less than significant, and this topic will not be discussed further in the EIR.

The project would not include the use of any septic tanks; additional wastewater output would be connected and treated by Susanville Sanitary District wastewater treatment system. With the inclusion of the bioretention basins, the proposed stormwater drainage system would be capable of handling existing and proposed stormwater volumes from the project site. Therefore, impacts related to septic tanks would be less than significant, and this topic will not be discussed further in the EIR.

- Greenhouse Gas Emissions (Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases): Neither the Lassen County General Plan nor the Susanville Vicinity Area Plan identify specific GHG or climate change policies or goals. As of the writing of this Draft EIR, the City of Susanville General Plan, which would be the operative document if the project is approved by the City and the annexation is approved by LAFCO, also does not identify specific GHG or climate change policies or goals. However, the general plan is in the process of being updated but has an unknown schedule for public release. As such, the current planning documents at the time the NOP for the Draft EIR was released include the Lassen County General Plan and the Susanville Vicinity Area Plan. The Lassen County General Plan and Susanville General Plan (1991 Community Health, Safety, and Conservation Element and 2025 Circulation Element) do,

nonetheless, include policies that are indirectly related to reducing GHGs, such as reduction in the use of wood fires in stoves/fireplaces, include geothermal heating or active or passive solar heating, TDM measures, and supporting provision of bicycle and pedestrian facilities. Therefore, in the absence of any adopted, quantitative threshold, the proposed project would not have a significant effect on the environment if the proposed project is found to be consistent with the applicable regulatory plans and policies to reduce GHG emissions, including the CARB 2022 Scoping Plan. As identified in the Initial Study for this EIR (Appendix A), jurisdictions taking meaningful climate action aligned with the State's climate goals in the absence of a CEQA-qualified Climate Action Plan should also look to the three priority areas to reduce GHG emissions: transportation electrification, VMT reduction, and building decarbonization. To assist local jurisdictions, Appendix D of the Scoping Plan presents a non-exhaustive list of impactful GHG reduction strategies that can be implemented by local governments within the three priority areas (Priority GHG Reduction Strategies for Local Government Climate Action Priority Areas). The Appendix D Local Actions include recommendations to build momentum for local government actions that align with the State's climate goals, with a focus on local GHG reduction strategies (commonly referred to as climate action planning) and approval of new land use development projects, including through environmental review under CEQA. The recommendations provided in Appendix D are non-binding (i.e., not regulatory) and should not be interpreted as a directive to local governments, but rather as evidence-based analytical tools to assist local governments with their role as essential partners in achieving California's climate goals. The project would include solar panels which would be installed in accordance with the California Energy Code requirements, EV charging/EV capable/EV ready spaces, in accordance with the CALGreen code, would not include on-site natural gas, except for usage in the commercial kitchens, and provide bicycle facilities that would meet or exceed the respective codes. The project would align with the VMT reductions in OPR's guidance as the project would result in mostly pass-by trips, as vehicles, trucks, and recreational vehicles divert only 0.14 miles from SR-36 and would not result in a substantial VMT increase, thus helping to reduce VMT, decarbonize the building and help transportation electrification. In addition to alignment with the recommendations in Appendix D Local Actions, the use of solar, EV charging/EV capable/EV ready spaces and facilitation of a future Class I bicycle lane (see Section 3.9 of this EIR) would also ensure the project does not conflict with those policies outlined in the Lassen County General Plan and Susanville General Plan, even though they do not directly relate to reducing GHGs. Therefore, impacts related to conflicts with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases would be less than significant, and this topic will not be discussed further in the EIR.

- Hazards and Hazardous Materials (all topics): The proposed project would comply with all applicable federal, State, and local requirements concerning the use, storage, and management of hazardous materials, including the Resource Conservation and Recovery Act, Hazardous Materials Transportation Act, California Hazardous Waste Control Law, federal and State Occupational Safety and Health Acts, Lassen County Air Pollution Control District rules, and permits and associated conditions issued by the City of Susanville. A public comment on the NOP expressed concern about containment for the underground fuel storage tanks. Per US Environmental Protection Agency (USEPA) requirements, tanks and piping installed or replaced after April 11, 2016 must be secondarily contained (i.e. double-walled) and use interstitial monitoring, which is, in effect, a leak detection system (USEPA 2024a). In addition, a Phase I Environmental Site Assessment (ESA) was previously undertaken for the project site (Reno Tahoe Geo Associates, Inc 2022), which revealed no evidence of recognized environmental conditions (REC's) at the site, thus meaning that construction activities such as excavation would not mobilize any existing contaminants in the soil, see Appendix B. Therefore, no significant impacts related to hazards and hazardous materials are anticipated, and this topic will not be discussed further in the EIR.
- Hydrology and Water Quality (all topics): The City of Susanville is within the jurisdiction of the Lahontan Regional Water Quality Control Board (LRWQCB), which is responsible for the preparation and implementation of the water quality control plan for the Region 6 area. For all construction activities disturbing one acre of land or more, the State also mandates the development and implementation of Stormwater Pollution Prevention Plans (SWPPP). During construction, per the National Pollutant Discharge Elimination System (NPDES) Construction General Permit, the proposed project would be required to implement a Stormwater Pollution Prevention Plan (SWPPP) that includes Best Management Practices (BMPs) to reduce pollutants in stormwater runoff from the project site. The

BMPs would adhere to the California Stormwater Quality Association BMP Handbook and would include use of sandbags, storm drain inlets protection, stabilized construction entrance, wind erosion control, and stockpile management to minimize the discharge of pollutants in stormwater during construction. Additionally, the proposed project would incorporate water quality BMPs as part of the LRWQCB mandated SWPPP to reduce the potential for discharge and would comply with all California Aboveground Storage Tank and Underground Storage Tank regulations. While an NOP comment expressed concern regarding the potential risks for contamination to the shallow groundwater table, based on borings conducted at the site for the geotechnical investigation, groundwater is approximately between 18-20 feet below ground surface (bgs). Although one boring found water at a depth of approximately 6 feet bgs, it was noted that it is likely a perched water table. In addition, the geotechnical investigation revealed the presence of 'fat clays' at the surface (typically clay is a barrier to contamination movement) and percolation tests yielded no downward movement of water, thus the NOP comment regarding the soil's hydrologic group designation does not correspond with the site-specific ground investigation. Furthermore, bioretention areas will be on site to capture runoff from the development. The subsurface will be designed in accordance with State Water Resources Control Board requirements (i.e. bioretention soil media (BSM) consisting of sand and compost, underlain by a layer of crushed drain rock). The organic materials that are found in BSM layers, and the vegetation that is typically planted, tend to break down the hydrocarbons and other pollutants that are commonly found at a site such as the project site. The bioretention areas will also have perforated underdrains, and ultimately the site would drain off along the railroad right-of-way. Therefore, no significant impacts related to hydrology and water quality are anticipated, and this topic will not be discussed further in the EIR.

- Land Use and Planning (all topics): The proposed project would not introduce physical barriers or change existing circulation patterns in a manner that would hinder access to existing communities. Therefore, the proposed project would not physically divide an established community. The City would amend the land use designation and pre-zone the project site as part of the project approval process. . Commercial Shopping Center would be the proposed general plan land use designation and upon annexation, General Commercial Shopping District (C-2) would be the proposed zoning. The proposed project would be consistent with the general plan and zoning land use designations upon annexation. Therefore, no significant impacts related to land use and planning are anticipated, and this topic will not be discussed further in the EIR.
- Mineral Resources (all topics): Per California's Surface Mining and Reclamation Act of 1975 (SMARA), the State Geologist conducted a Mineral Land Classification study of naturally occurring pozzolan in the Long Valley area of southeastern Lassen County. However, the study area assessed by the State geologist is along the SR 395 corridor between approximately 47 and 57 miles southeast of the project site. Due to the intervening distance to known areas of mineral resources, there would be no impact to naturally occurring pozzolan mineral extraction. There are no known mineral resources in the vicinity of the project site and the site is not classed as a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan map and the project would not create a loss of availability of a locally important mineral resource as none are present. Impacts would be less than significant and this topic will not be discussed further in the EIR.
- Noise (private airstrip or an airport land use plan): The project is located approximately three miles northwest of Susanville Municipal Airport. The project site is located outside of the airport's 65 dBA CNEL noise contour and outside of the airport influence area, according to the updated Lassen County Noise Element (Lassen County 2021) and its associated Lassen County Community Noise Levels kmz (Google Earth) file. Therefore, construction or operation of the project would not expose people to excessive airport related noise levels. Impacts would be less than significant and this topic will not be discussed further in the EIR.
- Population and Housing (all topics): The proposed project includes construction of a full-service travel center on vacant land and would not have potential to displace existing people or housing. The proposed project would not add new residential units or increase the residential population within the city. Although the proposed project would generate employment opportunities, it is expected that these jobs would be sourced from the local workforce. Therefore, no impacts related to population and housing are anticipated, and this topic will not be discussed further in the EIR.

- **Public Services** (all topics): The proposed project would not add new residential units or increase the residential population within the city. Therefore, the proposed project would not contribute to population growth that would substantially increase the demand for public services. Therefore, the proposed project would not necessitate the construction of new fire and police stations, schools, parks, or other public facilities to maintain acceptable service ratios, response times, or other performance objectives. Therefore, no impacts related to public services are anticipated, and this topic will not be discussed further in the EIR.
- **Recreation** (all topics): The proposed project would not add new residential units or increase the residential population within the city. Therefore, the proposed project would not contribute to population growth that would substantially increase the demand for recreation facilities. Therefore, the proposed project would not necessitate the construction of recreation facilities. Therefore, no impacts related to recreation are anticipated, and this topic will not be discussed further in the EIR.
- **Transportation** (design hazards and inadequate emergency access): The project would be required to comply with city safety standards, and that design standards are met to minimize any potential hazards related to the transportation circulation network. During operation, the project would not include design features, such as sharp curves or dangerous intersections, or incompatible uses that would result in traffic safety hazards. Ingress and egress movements for the project would be facilitated via the segregated driveway entrances, one for trucks and one for automobiles and RVs, which would have adequate sight-lines to the SR 36/Skyline Road intersection. Access to the project site would be required to comply with all city design standards, which would ensure adequate design and construction of proposed improvements. Therefore, no impacts related to design hazards are expected and this topic will not be discussed further in the EIR.

  As mentioned in the Project Design Features section (2.4.1) in the Project Description of this EIR, to prevent potentially significant construction-related traffic impacts, the project's contractor would implement a construction traffic management plan (CMTP) as PDF-TR-1. Prior to the initiation of any construction activities to ensure that access for all road users is maintained near the project site or impacted to the least extent feasible. Furthermore, the project would be subject to review and approval by all applicable city departments to ensure that the proposed project complies with City requirements related to emergency response. The project would be designed and maintained in accordance with applicable standards associated with vehicular access, such that interference with existing emergency response or evacuation plans would not occur. As a condition of project approval, the City of Susanville Fire and Police Departments would review the project plans to ensure that adequate emergency vehicle access is provided. Given proper design of ingress/egress driveways and compliance with applicable standards and local regulations, operation of the project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. Additionally, per California Department of Transportation (Caltrans) recommendations, large-size construction truck travel would be limited to off-peak commute hours to the maximum extent feasible, details of which would be outlined in the CTMP. Furthermore, Caltrans requires a permit for any heavy construction equipment and or materials that require the use of oversized transport vehicles on State highways. Should this permit be required, details would be provided within the CTMP. Finally, Caltrans District 2 – Redding is the Caltrans District with responsibility for issuing encroachment permits. Encroachment permits act as permissive authority for the permittee to enter State highway right-of-way to construct, alter, repair, improve facilities, or conduct specified activities. Any required encroachment permits would also be detailed within the CTMP. Through limiting large-size truck travel to off-peak commute hours would help to ensure that emergency response vehicles would not be impeded. Any lane closures required for installation of utility connections and junction modifications would be subject to Caltrans permits and procedures which would additionally minimize impacts to emergency response. Therefore, no impacts related to emergency response are expected and this topic will not be discussed further in the EIR.
- **Utilities and Service Systems** (water supplies, wastewater treatment capacity, solid waste capacity, and solid waste regulations): As outlined in the Initial Study (Appendix A), the city has ample water rights and capacity for the projected future demand of the project (7.8 to 10.1 AFY) and future demand of other residential and commercial consumers. The Susanville Wastewater Treatment Plant (WWTP) treats approximately 1.0 million gallons of

wastewater per day during dry weather and approximately 1.2 million gallons per day (mgd) in wet weather. The WWTP has the capacity to treat and discharge 2.0 mgd average monthly flow and 3.1 mgd peak wet weather flow, with a maximum hydraulic capacity of 4.0 mgd. The typical water demand to sewer demand ratio is 1.15:1, meaning that for every 115 gallons of water consumed, 100 gallons of wastewater would be generated. However, assuming all water used by the project (approximately 7,000 to 9,000 gpd or 7.8 to 10.1 AFY) resulted in an equal amount of wastewater generated, the additional 9,000 gpd would be well within the WWTP's ability to treat and discharge the generated wastewater. Therefore, no impacts related to water supplies and wastewater treatment are expected and these topics will not be discussed further in the EIR.

The USEPA's Landfill Methane Outreach Program (LMOP) Landfill and Landfill Gas Energy Project Database (USEPA 2024b) notes that the Bass Hill landfill has an annual waste acceptance rate of 22,457 tons per year. The estimated solid waste generated from the project is 426 lbs/day which would equate to 155,490 lbs/year or approximately 78 tons/year. This would represent 0.35 percent of the annual waste accepted by the Bass Hill landfill site. The estimated 0.213 tons/day of solid waste that would be generated during project operation would represent a negligible increase in the daily waste received at the Bass Hill landfill. All local governments, including the City of Susanville, are required under AB 939, the Integrated Waste Management Act of 1989, to develop source reduction, reuse, recycling, and composting programs to reduce tonnage of solid waste going to landfills. Cities must divert at least 50 percent of their solid waste generation into recycling. If the local jurisdiction's solid waste exceeds the target, the local jurisdiction would be required to pay fines or penalties from the State for not complying with AB 939. The waste generated by the project would be incorporated into the waste stream of City of Susanville, and diversion rates would not be substantially altered. Therefore, no impacts related to solid waste capacity and solid waste regulations are expected and these topics will not be discussed further in the EIR.

- Wildfire (all topics): The project site is located outside the California Department of Forestry and Fire Protection (CAL FIRE) State Responsibility Area and is not classified as a Very High or High Fire Hazard Severity Zone within a Local Responsibility Area (CAL FIRE 2023; CAL FIRE 2025). As a condition of project approval, the City of Susanville Fire and Police Departments would review the project plans to ensure that the project complies with all applicable fire codes and building code standards and provides adequate emergency vehicle access. Therefore, no impacts related to wildfire are anticipated, and this topic will not be discussed further in the EIR.

3.1 AESTHETICS

This section provides a description of existing visual conditions, meaning the physical features that make up the visible landscape, near the project site and an assessment of changes to those conditions that would occur from project implementation. The effects of the project on the visual environment are generally defined in terms of the project's physical characteristics and potential visibility, the extent to which the project's presence would change the perceived visual character and quality of the environment, and the expected level of sensitivity that the viewing public may have where the project would alter existing views. The "Analysis Methodology" discussion below provides further detail on the approach used in this evaluation.

Aesthetics was originally a topic scoped out of the Draft EIR, however, one NOP comment related to aesthetics was received during the scoping period, which requested greater consideration of aesthetic impacts, hence the subject's inclusion in the Draft EIR (see Appendix A).

3.1.1 Regulatory Setting

FEDERAL

National Scenic Byways Program

The National Scenic Byways Program (23. U.S.C. 162) provides that the Transportation Secretary can designate a road as a National Scenic Byway, All-American Road, or as one of America's Byways if it meets specific criteria defined by the Secretary. Six intrinsic qualities evaluated to determine whether a road or highway qualifies under the National Scenic Byways program are scenic quality, natural quality, historic quality, cultural quality, archaeological quality, and recreational quality. To be designated as an All-American Road, the road or highway must meet the criteria for at least two intrinsic qualities and be considered a destination unto itself. There are 184 such designated byways in 48 states (DOT 2024).

The closest federally designated byway in the Project vicinity is the Volcanic Legacy Scenic Byway, located 6.3 miles east of the project site, starting at the intersection of SR 36 and SR 44.

STATE

California Scenic Highway Program

The California Scenic Highway Program, maintained by the California Department of Transportation (Caltrans), protects California State Highway corridors from changes that would diminish the aesthetic value of lands adjacent to the highways, and works to enhance their natural scenic beauty. The Scenic Highway Program includes a list of highways that are either officially designated or eligible for designation as scenic highways. The status of a proposed state scenic highway changes from eligible to officially designated when the local governing body applies to Caltrans for scenic highway approval, adopts a Corridor Protection Program, and receives notification that the highway has been officially designated a Scenic Highway. Development near a scenic highway does not render a roadway ineligible, nor is development or lane widening prohibited in officially designated scenic highways.

California Code, Business and Professions Code - Section 13531 and 13532

Section 13531 of the Business and Professions Code (BPC) requires that the sale of any motor vehicle fuel to the public from any place of business shall display on the premises an advertising medium that complies with the requirements of the BPC and advertises the total prices of the three major grades of motor vehicle fuel offered for sale. This sign shall be clearly visible from the street or highway adjacent to the premises. When the place of business is situated at an intersection, the advertising medium shall be clearly visible from each street of the intersection.

Per Section 13532, the advertising medium must display the total price per gallon including all taxes, in numerals, and fractions when applicable, not less than six inches in height and of uniform size and color; the trademark or brand of the motor vehicle fuel not less than one-third the size of the numerals designating the price; the word "gasoline" not less than one-third the size of the numerals designating the price; and the grade designation not less than one-sixth the size of the numerals designating the price.

LOCAL

Lassen County General Plan

The following General Plan goals, policies and implementation measures are pertinent to the aesthetics evaluation for the project.

Natural Resources Element, Chapter 11, Scenic Resources

GOAL N-23: Scenic resources of high quality which will continue to be enjoyed by residents and visitors and which will continue to be an asset to the reputation and economic resources of Lassen County.

- **NR78 POLICY:** The County has identified areas of scenic importance and sensitivity along state highways and major County roads and has designated those areas as "Scenic Corridors". (Refer to the General Plan land use map and related designations in various area plans, which may also be regarded as "scenic highway corridors".) The County will develop and enforce policies and regulations to protect areas designated as scenic corridors from unjustified levels of visual deterioration.
  - Implementation Measures:

    NR-U The County shall adopt policies to minimize adverse impacts which will significantly deteriorate the scenic qualities of visually sensitive areas.

    NR-V Areas designated and zoned for development in scenic corridors shall be zoned as "Design Review Combining Districts" or otherwise regulated to require review and management by the County of the visual impacts of proposed development.
- **NR79 POLICY:** The County shall continue to use "Design Review Combining Districts" to review the visual impacts of development in designated areas to minimize significant adverse impacts.
  - Implementation Measure:

    NR-W The County shall adopt design and development standards for use in "Design Review" areas and scenic corridors to guide the consideration and management of potential significant impacts to scenic resources.
- **NR80 POLICY:** In the course of adopting policies pertaining to scenic resources in other general plan elements and area plans, the County may consider additional and more particular policies and measures to protect scenic resources and prevent or reduce the adverse visual impacts of development in visually sensitive areas.

GOAL N-24: Protection of the scenic qualities of the county's night sky.

- **NR81 POLICY:** The County shall maintain and enforce policies, development standards and mitigation measures to control lighting generated by development and to minimize the unnecessary adverse impacts of such lighting in the vicinity of the development and on the general scenic qualities of the night sky in the area.
- **NR82 POLICY:** The County will encourage projects within Lassen County but outside the County's jurisdictional authority to include provisions to minimize the adverse intrusion of lighting on the surrounding area and the night sky in general.

Lassen County Code

Section 18.108.155, Lighting, of the Lassen County Code contains the following policy related to aesthetics that would apply to the proposed project:

> Unless otherwise provided in this title, the following lighting requirements shall apply: All lighting, exterior and interior, shall be designed and located so as to confine direct lighting to the premises. A light source shall not shine upon or illuminate directly on any surface other than the area required to be lighted. No lighting shall be of the type or in a location such that constitutes a hazard to vehicle traffic, either on private property or on abutting streets.

Susanville Vicinity Area Plan

H. ISSUE: Scenic Resources

Goal and Objective: Protect the scenic and aesthetic values of the planning area by recognizing and protecting unique scenic features and by encouraging land use patterns and design elements which will maximize the enhancement potential of these features.

Scenic Corridors

- **Policy 8.1** Lassen County should protect, maintain and establish scenic corridors in order to preserve the beauty of its landscapes. The scenic corridors designated are shown on the land use map. These corridors shall protect the visual quality of unique scenic resources.
  - Implementation

    8.11 A public hearing should be held to determine whether the County should request the State to include the scenic corridors described above into the State system of scenic highways.

    8.12 New development in these corridors should use natural materials and earthtone colors that blend into the landscape.

    8.13 Billboards with the exception of those noted in implementation measure 8.14, should not be permitted within the corridor because they distract from the scenic quality of the area. Because on-site advertising is sometimes necessary to inform motorists of the location or nature of a commercial enterprise, on-site signs may be allowed if they are simple, easy to read and do not conflict with the landscape.

    8.14 The County, City and Lassen County Chamber of Commerce should develop standards to allow "clustered" billboards within the scenic corridors such as those uses along Oregon Highways. Clustered billboards allow several advertisers to group their displays on a common billboard.

    8.15 Commercial uses along the scenic corridor should be subject to strict design review by the Planning Commission, Board of Supervisors or special design review committee.

    8.16 Utilities in the scenic corridors should be placed underground whenever possible.

City of Susanville General Plan

Land Use and Community Development Element

GOAL LUD-1: To promote high-quality development of a well-balanced and functional mix of land uses that preserves and enhances Susanville's quality of life. [Existing Goal 3.1, modified].

- **Policy LUD-1.1:** Land Use Compatibility. The City shall ensure compatibility between land uses to protect, maintain, and enhance the quality of life in the city by addressing traffic, noise, lighting. Height/bulk differences, and other sources of incompatibility through the use of physical separation, buffering, screening and other techniques. [Existing Policy 3.1-A, modified].

GOAL LUD-3: To ensure that existing and proposed commercial development in the city is consistent with the overall character of the city. [New Goal]

- **Policy LUD-3.2:** New Commercial Development. The City shall ensure that new commercial development is appropriately located and is consistent with the Community Character Element of the General Plan. [New Policy].
- **Policy LUD-3.3:** High-Quality Building Design. The City shall require distinctive and high-quality commercial building design, construction, and site planning that respects the character of Susanville. [New Policy].
- **Policy LUD-3.4:** Commercial Amenities and Impact Mitigation. The City shall require new or expanded commercial or office areas to include provisions for adequate off-street parking, pathways connecting building entries to sidewalks, bicycle parking, mitigation of traffic impacts, adherence to architectural and low-water landscaping standards, and mitigation of potential land use conflicts with adjacent residential uses. [New Policy].

Circulation Element

GOAL CIR-7 Improve pedestrian networks and amenities to create more safe and walkable neighborhoods. [New Goal]

- **Policy CIR-7.3:** Street Lighting. Enhance street lighting, as necessary, to provide better pedestrian safety. [New Policy]

Community Character Element

GOAL 9. Open up views of the river to the public.

- **Policy 9m:** The City shall work through the Parks and Recreation Commission, the Chamber of Commerce, the school districts, and the County to open the river to public view and use.

GOAL 11: Upgrade the quality of all development, existing and future, and assure that new development is attractive.

- **Policy 11q:** The City shall promote better looking commercial and industrial development, remodelings, and signs.
  - **Action program [26]:** Adopt a design review ordinance which establishes a formal design review process and includes design guidelines for all new commercial and industrial development, remodelings, and signs.

City of Susanville Code of Ordinances

Section 17.96.050 Lighting - All lighting, exterior and interior, shall be designed and located so as to confine direct lighting to the premises. A light source shall not shine upon or illuminate directly on any surface other than the area required to be lighted. No lighting shall be of the type or in a location such that constitutes a hazard to vehicular traffic, either on private property or on abutting streets. Lighting plans shall show the location, height, type, spread and intensity of exterior lighting on the site. All exterior lighting for nonresidential uses shall be downward directional and shall include full cut-off fixtures to provide security while protecting the Susanville night sky. All exterior lighting for residential uses, except parking lot lighting which must have full cut-off fixtures, is encouraged to be downward directional and include full cut-off fixtures.

17.128.130 General on-site sign standards - In addition to the sign requirements specified for individual districts, the following shall also apply for each district:

A. Other Signs Permitted. In addition to the signs permitted in individual districts, the following signs are permitted in all districts unless otherwise indicated by this section:
   1. Under-Canopy Signs (On-Site). In any commercial or industrial district, an under-canopy sign may be permitted with a sign permit for each business, provided it shall not exceed five feet in length and one foot in height. Undercanopy signs shall be located perpendicular to the face of the building under the canopy, and shall have a minimum eight-foot clearance between the bottom of the sign and the sidewalk or other pedestrian way.
   2. Gasoline Price Signs. Gasoline price signs shall be allowed on freestanding signs with a sign permit if made integral with the design of the freestanding sign or placed on-site as per state law.
   3. Signs in the Public Right-of-Way. No sign shall be allowed in the public right-of-way unless an encroachment permit is issued by the department of public works.

B. Exempt Signs. The following signs shall be exempt from the application, permit and fee requirements of this chapter. An electrical or building permit may, however, be required under this chapter:

1. Any public notice or warning required by a valid and applicable federal, state or local law, regulation or ordinance.
2. Window signs may be permitted in any commercial or industrial district without a sign permit if the signs are placed entirely within the building. Signs may also be painted without a permit on the interior or exterior surfaces of windows or doors. None shall be permitted above the ground floor.
3. Works of art that do not include a commercial message, such as a mural on the side of a building; provided, however, murals are regulated at Chapter 12.28 of this code.
4. Holiday lights and decorations, including decorations on windows, are not construed as signs.
5. Incidental and traffic control signs on private property, such as stop, yield, and similar signs, the face of which meets city standards and which contain no commercial message of any sort.
6. Building address markers or name of property owners or tenants.
7. Real estate signs for sale or lease of residential property are permitted uses provided there are not more than two signs per zone lot, each sign not to exceed six square feet in area and not more than six feet in height. If there are five or more lots for sale, one real estate sign, not to exceed 32 square feet in area and ten feet in height shall be permitted.
8. Real estate signs for sale or lease of industrial or commercial property are permitted provided there are not more than one sign per street frontage not to exceed 32 square feet in area to advertise the sale, lease or rent of such property. No such sign shall exceed eight feet in overall height and shall not be located closer than 10 feet from any property line. Where a property has in excess of 600 lineal feet of frontage, an additional sign for every 600 lineal feet is allowed.
9. Contractor or construction sign: one directory sign shall be permitted on the construction site for all contractors (may include bank, realtors, subcontractors, etc.) not exceeding 32 square feet unless legally required by government contracts to be larger. No sign shall exceed eight feet in overall height and shall be located no less than 10 feet from any property line. Such sign shall be removed upon completion of the project.
10. Future Tenant Identification Sign. Future tenant identification signs may be placed on vacant or developing property to advertise the future use of the property and where this information may be obtained. Such signs shall be limited to one per parcel and to a maximum of 32 square feet in area and eight feet in overall height. Further, such signs shall be placed no less than 10 feet from any property line. Any such sign shall be removed upon completion of the project.
11. Signs of public utility companies indicating danger or which serve as an aid to public safety, or which show locations of underground facilities or public telephones.
12. Safety Signs on Construction Sites.
13. Sandwich board signs two feet wide by three feet in height or less. Said signs shall be located near the curb, shall not obstruct pedestrian movement on the sidewalk and shall not obstruct traffic movement/sight distance at intersections.

C. Color, Lighting and Noise. The following color, lighting and noise requirements shall apply to all signs allowed by this chapter:

1. No blinking, flashing, rotating, revolving or animated signs, or signs that change color or intensity or emit odors, fluids, noise, smoke, etc., shall be permitted on the exterior of any building, except that a portion of a sign used to display time, date or weather information may contain blinking or flashing information related thereto.

2. Lights used to illuminate signs or advertising structures shall be installed so as to concentrate the illumination on the sign or advertising structure and minimize glare or direct illumination upon a public street or adjacent property.
3. No red, green or amber lights or illuminated signs may be placed in such positions that they could reasonably be expected to interfere with or be confused with an official traffic control device or traffic signal or official directional guide signs.

D. Placement on Buildings.

1. Roof signs shall not be permitted in any zone.
2. All building signs projecting more than 12 inches from the building face, wall or canopy upon which it is displayed shall have at least eight feet of clearance between the sign and the ground.

E. Location Requirements.

1. There shall be no lighted, freestanding sign within 50 feet of a residential district.
2. No sign shall be permitted in or over a public right-of-way without first obtaining an encroachment permit. Any such sign shall have a minimum vertical clearance of eight feet above such right-of-way.

F. Exceptions. Exceptions may be made to the size, height, location and numbers of signs as specified in any district, or this section, if a use permit is approved by the planning commission. The burden of proof to justify an exception shall be on the applicant to demonstrate that practical difficulties or hardships would otherwise be caused and the exception applied for is the most suitable and effective in relation to the location or terrain of the site or from the stand-point of the intended viewer.

3.1.2 Environmental Setting

The methodology for describing the environmental setting related to aesthetics was adapted from the Federal Highway Administration's (FHWA) Guidelines for the Visual Impact Assessment of Highway Projects (2015). Identifying the project area's visual resources, character, and quality involves the following process:

- objectively identifying visual features and resources of the landscape,
- assessing the character and quality of the resources relative to overall regional visual character, and
- determining importance to people (or sensitivity) of views of visual resources in the landscape.

Visual character is described through the elements of form, line, color, and texture of the landscape features. The appearance of a landscape can be described in terms of the dominance of each of these components. Visual quality is assessed through determining the degree of vividness, unity, and intactness of the view:

- Vividness: the visual power or memorability of landscape components as they combine in striking or distinctive visual patterns.
- Intactness: the visual integrity of the natural and human-built landscape and its freedom from encroaching elements; this factor can be present in well-kept urban and rural landscapes, as well as in natural settings.
- Unity: the visual coherence and compositional harmony of the landscape considered as a whole; it frequently attests to the careful design of individual components in the landscape.

Viewer groups include (1) travelers, such as those that are commuting, touring, or transporting goods on roadways, and (2) neighbors, such as those occupying residential, institutional, retail, commercial, industrial, or agricultural land use. Viewer sensitivity is affected by proximity (i.e., the distance from the viewer to the scene), extent (i.e., number of viewers observing the scene), and duration (i.e., how long viewers spend looking at the scene)

VISUAL CHARACTER OF THE PROJECT SITE AND SURROUNDING AREA

The City of Susanville is located on the Susan River in the southern part of Lassen County, California at the head of Honey Lake Valley. The city is surrounded by mountains and hills to the north, west, and south, with Susanville Peak to the north and Diamond Mountain to the south. The city is located approximately 4.5 miles northwest of the unincorporated community of Johnstonville and 82 miles northwest of Reno.

The topography in the City of Susanville is generally sloping to the north and northwest, approximately 4,200 to 4,400 above mean sea level (msl). As you head northwest on SR 36/Main Street and out of the city, the slope intensifies to approximately 5,000 msl. Existing views in the City of Susanville include interrupted expanses of "wide skies" and panoramic vistas of distant mountains, though buildings and existing vegetation somewhat block longer-range views, particularly along SR 36/Main Street. Although the areas concentrated around SR 36/Main Street have been developed with rural residential, commercial, and industrial land uses, many acres of undeveloped land lie to the northeast, southeast and southwest of the city.

The project site consists of vacant, undeveloped land and is disturbed and heavily populated with invasive plant species. Several barbed wire fence lines are present on the property, indicating the site was likely previously used as pastureland. Additionally, a former barn with associated outbuildings and a retention pond was present immediately west of the site, although this had been demolished by August 2019.

The project site area is generally flat at an elevation between 4,151 to 4,153 feet msl. The SR 36 highway embankment and future road grade is at 4,154 ft at the intersection with Skyline Road, and the former railroad embankment is approximately 6 ft higher than the project site at 4,159 ft. Views from the project site and the offsite utility alignments generally consist of vast open space, with visual elements that include Susanville Peak to the north and Diamond Mountain to the south.

VIEWS OF THE PROJECT SITE AND SURROUNDING AREA

To the north, the project site is located proximate to the Susan River with Riverside Drive, commercial businesses and the Lassen County Government center beyond. To the east, the project site is bounded by SR 36 with primarily vacant land beyond. To the south, the former Southern Pacific Railroad right-of-way (ROW) is immediately adjacent to the project site, although the tracks were removed in approximately 2006 and the ROW is now effectively an unpaved extension of Skyline Road, with several residential properties situated on large lots present off Sierra Road further to the south. Beyond Sierra Road lies grazing/agricultural land. To the west, the remainder of the project parcel is present with vacant land adjacent, and a lumber yard associated with a prefabricated construction company beyond. To the east and southwest and towards Honey Lake, the terrain is generally much flatter, and views are less distinctive.

Four viewpoints to the project site were chosen to represent views where the project would be most visible to the public and most appropriate for the analysis of impacts. The visual character and quality of the views from the four viewpoints are described below.

Viewpoint 1 (SR 36 looking south from SR 36, north of the Susan River)

Viewpoint 1 is from SR 36 looking south from a point just after the Riverside Drive/SR 36 Intersection, north of the Susan River (Figure 3.1-1). The visual character from Viewpoint 1 is that of a rural landscape. The viewpoint consists of a vast expanse of sky and ruderal vegetation (grazing land) that is dominated to the west by mountains. In the foreground, vegetation associated with the banks of the Susan River is present along with grassland areas. Linear vertical elements from this viewpoint include fences and sign posts. The dominant hues are muted, including the gray asphalt of the roadway and various tan, brown, and grayish green shades of the vegetation and landforms. There are distant views of mountains in the background.

Vividness is moderate because the landscape within Viewpoint 1 is relatively uniform with the surroundings and is not characterized by prominent or striking features, although snow on the distant mountains does make the viewpoint more striking. Intactness is moderately low because although the surrounding landscape is generally rural and undeveloped, Viewpoint 1 shows evidence of human disturbance from past grading activities and encroaching man-

made infrastructure such as the agricultural buildings and lumber yards to the east. Although the roadway is an encroaching element, unity is moderate because its lines are in harmony with the natural lines of the landscape and the roadway does not appear visually incongruous. Overall, the visual quality at Viewpoint 1 is moderate.



Source: Ascent in 2025.

Figure 3.1-1 Viewpoint 1 (SR 36 Looking South from SR 36, North of the Susan River)

Viewpoint 2 (SR 36 looking northwest from south of the SR 36/Skyline Road Intersection)

Viewpoint 2 is from SR 36 looking northwest from south of the SR 36/Skyline Road Intersection (Figure 3.1-2). Similar to Viewpoint 1 described above, the visual character from Viewpoint 2 is that of a rural landscape. This viewpoint also consists of a vast expanse of sky and grazing land that is dominated by grassland and contains scattered low-lying shrubs and ruderal vegetation. The foreground is dominated by linear horizontal elements, including the power lines that cross SR 36. Linear vertical elements are limited to an abundance of fences and gates, power line poles and lighting masts associated with the SR 36/Skyline Road intersection. The dominant hues are muted, including the faded gray asphalt of the roadway and various tan, brown, and grayish green shades of the vegetation and landforms, with blue buildings associated with the prefabricated construction company lumber yard in the distance. There are views of mountains in the background, including Roop Mountain and Susanville Peak, which stand out in contrast to the relatively flat landscape in the foreground and midground.

Vividness is moderately low because the landscape within Viewpoint 2 is relatively uniform with the surroundings, but offers views of Roop Mountain and Susanville Peak, which is a notable landmark to the north. Intactness is moderate because the surrounding landscape is generally rural, with evidence of human disturbance from past grading activities, man-made infrastructure and distant views of the prefabricated construction company lumber yard. Although the roadway is an encroaching element, unity is moderate because its lines are in harmony with the natural lines of the landscape and the roadway does not appear visually incongruous. Overall, the visual quality at Viewpoint 2 is moderate.



Source: Ascent in 2025.

Figure 3.1-2 Viewpoint 2 (SR 36 Looking Northwest from South of the SR 36/Skyline Road Intersection)

Viewpoint 3 (Skyline Road looking west)

Viewpoint 3 is from Skyline Road looking west (Figure 3.1-3). Similar to Viewpoints 1 and 2 described above, the visual character from Viewpoint 3 is that of a rural landscape. This viewpoint also consists of a vast expanse of sky and undeveloped land that is dominated by grassland and scattered low-lying shrubs and ruderal vegetation. The foreground is dominated by linear horizontal elements, including SR 36 and fences. There are no prevalent linear vertical elements. The dominant hues are muted, including the faded gray asphalt of the roadway and various tan, brown, and grayish green shades of the vegetation and landforms, although the blue buildings associated with the prefabricated construction company lumber yard does draw the eye to it. There are views of mountains in the background, which stand out in contrast to the flat landscape in the foreground and midground.

Vividness is moderately low because the landscape within Viewpoint 3 is uniform with the surroundings and is not characterized by prominent or striking features. Intactness is moderately low because although the surrounding landscape is generally rural and undeveloped, Viewpoint 3 shows evidence of human disturbance from past grading activities and distant views of the prefabricated construction company lumber yard.

Although the roadway is an encroaching element, unity is moderate because its lines are in harmony with the natural lines of the landscape and the roadway does not appear visually incongruous. Overall, the visual quality at Viewpoint 3 is moderate.



Source: Ascent in 2025.

Figure 3.1-3 Viewpoint 3 (Skyline Road Looking West)

Viewpoint 4 (Former Railroad Looking Northeast)

Viewpoint 4 is located on the former railroad right-of-way (Figure 3.1-4). Similar to Viewpoints 1, 2, and 3 described above, the visual character from Viewpoint 4 is that of a rural landscape. This viewpoint also consists of a vast expanse of sky and undeveloped land that is dominated by ruderal vegetation. The foreground is dominated by ruderal vegetation with linear horizontal elements such as rolling hills/mountains and the horizon itself in the background. Vertical elements include the fences and utility lines.

The dominant hues are muted, including the reddish-brown (burnt umber) edges of the unpaved roadway and various tan, brown, and green shades of the vegetation and landforms. There are views of mountains in the background, which stand out in contrast to the flat landscape in the foreground and midground.

Vividness is moderately low because the landscape within Viewpoint 4 is uniform with the surroundings and is not characterized by prominent or striking features. Intactness is moderately low because although the surrounding landscape is generally rural and undeveloped, Viewpoint 4 shows evidence of human disturbance with agricultural buildings and scattered residences to the northeast. Overall, the visual quality at Viewpoint 4 is moderately low.



Source: Ascent in 2025.

Figure 3.1-4 Viewpoint 4 (Former Railroad Looking Northeast)

VIEWER SENSITIVITY

The project site, including the offsite utility alignments, are primarily surrounded by vacant/grazing land. The project site is adjacent to SR 36, which is an east–west state highway that connects US 395 near Johnstonville in the east to US 101 near Fortuna to the west, although it is predominantly aligned northwest-southeast at the point SR 36 meets the project site. Nearby land uses include agricultural uses, commercial fast-food restaurants, a coffee shop, farm equipment rental, grocery store, and banks. There are several residential land uses in proximity to the project site, chiefly located to the south/southwest and south of the former railroad tracks.

Viewer groups of the project site would primarily consist of thru-motorists (e.g., commercial truck drivers, commuters, and tourists) traveling on SR 36 and Skyline Road and nearby residential receptors. Regarding views visible from the highway, people experience their surrounding landscapes differently. Some viewers are sensitive to changes in their environment and others may vary in sensitivity, but due to the duration (static or slow duration versus dynamic views, such as those speeding by on the freeway), the relative visual experience may be diminished or heightened. Travelers' sensitivities tend to vary with the reason for their travel. As tourists, they may be sensitive to aesthetic changes, but because they are commonly not familiar with the existing conditions, project changes may not be as noticeable. Other travelers, such as commuters and haulers, may view the environment from a practical perspective – by placing most of the aesthetic value and enjoyment of the travel corridor on the functionality and smooth movement. Commuters regularly travel the same route, whether for work or leisure, and because the trips are repeated, they become routine rather than novel; aesthetic changes that reduce visual coherence will be highly noticeable to commuters because of their familiarity with the landscape. Travelers are generally interested in the aesthetics of the route but potentially are less sensitive than nearby neighboring households and businesses. Additionally, a traveler's views from SR 36, whether as a driver or passenger, would be of short duration because road users would be generally traveling at speeds of up to 50 mph. As autonomous vehicles or new transit options are developed, the traveler's focus may shift more from the roadway to the surrounding environment; however, until these vehicles and transit options become commonplace, views of construction equipment would be relatively fleeting. To put this into context, to travel 0.4-miles from the Riverside Drive/SR 36 intersection to the proposed new project access at Skyline

Road/SR 36 intersection at 50 mph would take approximately 30 seconds. The overall visual sensitivity of motorists is low because they would generally be focused on the roadway. In addition, because motorists would be passing through, the duration and frequency of exposure to the project site for this viewer group would be minimal.

Workers at nearby job centers would also be considered a viewer group because they may travel along SR 36 and Skyline Road to reach job centers, such as businesses within the City of Susanville. Because workers are focused on their commute while driving, their visual sensitivity is low. Workers may appreciate views from their windows at work, but there is rarely an expectation of an aesthetic as a requirement of their place of employment and therefore, residents tend to be more sensitive to visual changes than workers.

The neighboring households have a permanent view of SR 36 and the project site; however, certain views may be filtered by vegetation, and residences are varying distances from the Project, and not all are likely to experience direct views of the new Travel Stop. Although this group's sensitivity to change is generally greater than travelers, these groups not only have views from their property, but they are also frequent users of SR 36, which often serves as a part of their access to their property. Therefore, their views engulf the highway route common to the vehicle viewer group. Depending on the viewer's locale (work versus residential), these groups range from major to moderate sensitivity to changes in visual resources. These views tend to be habitual and static views, and therefore, these viewers can watch the evolution of changes as they occur. Residents may gaze at their views as an extension of their living environment and therefore concern themselves with whether changes would degrade or improve the aesthetic experience and, by extension, affect the value of their residence.

Finally, recreationalists use the outdoor resources within the project area for longer durations at slower speeds than those in a vehicle group and at closer proximity than the neighbor/community group. The recreationalist viewer group includes pedestrians, bicyclists, and other recreationalists (ATVers, equestrian users etc.). Their views are more intensely experienced because their activity is explicitly linked to the outdoor and aesthetic experience, which occurs at a slower and more detailed level than vehicle travelers or those looking upon the environment from their residence or place of work. Pedestrians (followed by equestrians) are the most sensitive recreationalist viewers because they move through the landscape at the slowest pace. Bicyclists and ATVers are somewhat less sensitive to visual change because they move through the landscape more quickly. The recreationalist viewer group may include people from the other viewer groups, but due to their activities and interest, it is anticipated that this group has a highly vested interest in the aesthetic treatments of the natural environments and high sensitivity to changes. This group is important because of the proximity of their activities to the project site, especially noting the potential future expansion of the Bizz Johnson Trail.

LIGHT AND GLARE CONDITIONS

The project site is located within a rural area but characterized by moderate ambient nighttime lighting levels due to proximity to the City of Susanville and from headlights of vehicles traveling on SR 36. Additionally, there is already lighting present at the SR 36/Skyline Road intersection for safety purposes and at the entrance to the City of Susanville on the approach to the SR 36/Riverside Drive intersection. No other streetlights are present along the offsite utilities' alignments.

Glare occurs from sunlight reflected from reflective materials utilized in existing buildings along the adjacent roads and from vehicle windows and surfaces. Glare-sensitive receptors include the residential uses surrounding the project site. As glare is a temporary phenomenon that changes with the movement of the sun, receptors other than motorists are generally less sensitive to glare impacts than to light impacts. Existing glare sources are predominately limited to reflective surfaces from vehicles.

3.1.3 Environmental Impacts and Mitigation Measures

METHODOLOGY

There is no widely recognized guidance for evaluating aesthetics impacts from travel stops or gas stations. Therefore, the methodology for evaluating impacts related to aesthetics was adapted from FHWA Guidelines for the Visual Impact Assessment of Highway Projects (2015). Visual impacts are evaluated based on the changes to the environment (measured by the compatibility of the impact) or to viewers (measured by sensitivity to the impacts). Together, the compatibility of the impact and the sensitivity of the impact yield the degree of the impact to visual quality.

- Compatibility of the Impact: Defined as the ability of the environment to absorb the proposed project as a result of the project and the environment having compatible visual characters. The proposed project can be considered compatible or incompatible.
- Sensitivity to the Impact: Defined by the ability of viewers to see and care about a project's impacts. The sensitivity to impact is based on viewer sensitivity to changes in the visual character of visual resources. Viewers are either sensitive or insensitive to impacts.
- Degree of the Impact: Defined as either a beneficial, adverse, or neutral change to visual quality. A proposed project may benefit visual quality by either enhancing visual resources or by creating better views of those resources and improving the experience of visual quality by viewers. Similarly, it may adversely affect visual quality by degrading visual resources or obstructing or altering desired views.

The analysis also evaluates whether the proposed project would conflict with applicable zoning and other regulations governing scenic quality. A conflict with zoning and other regulations governing scenic quality, in and of itself, is not considered a significant impact under CEQA. Rather, a significant impact would result if the conflict is the result of a physical change to the environment that causes a substantially adverse change to scenic quality.

Lighting effects are typically associated with the use of artificial light during the evening and nighttime hours. There are two primary sources of light: light emanating from building interiors passing through windows and light from exterior sources (i.e., street lighting, building illumination, security lighting, parking lot lighting, vehicle lights, and landscape lighting). The introduction of lighting can be a nuisance to adjacent residential areas, can limit the view of the clear night sky and, if uncontrolled, can cause disturbances (e.g., disruption to sleep). Residential land uses are considered light sensitive because occupants have expectations of privacy during nighttime hours and may be subject to disturbance by light sources. Spillover lighting is defined as the presence of unwanted light on properties adjacent to the property causing illumination. With respect to lighting, the degree of illumination may vary widely depending on the amount of light generated, height of the light source, presence of barriers or obstructions, type of light source, and weather conditions.

Glare is primarily a daytime occurrence caused by the reflection of sunlight or artificial light on highly reflective surfaces, such as window glass, stainless steel, aluminum, and photovoltaic panels. Daytime glare generation is common in urban and suburban areas and is typically associated with buildings with exterior facades largely or entirely composed of highly reflective glass. Glare can also be produced during evening and nighttime hours by the reflection of artificial light sources such as automobile and truck headlights. Glare generation is related to either moving vehicles or sun angles, although glare resulting from reflected sunlight can occur regularly at certain times of the year. Mid- to high-rise buildings with large surface areas of reflective or mirrorlike materials are a common source of daytime glare, especially around sunrise and sunset. Glare-sensitive land uses include residences (primarily outdoor areas), hotels, transportation corridors, and aircraft landing corridors.

PROJECT DESIGN FEATURES

The analysis of environmental impacts on aesthetics focuses on the potential for substantial adverse effects on visual resources such as scenic vistas, scenic resources, visual character and creation of light and glare. Significance determinations account for the influence of relevant Project Design Features (PDFs), which are listed below.

- PDF-AES-1: Outdoor lighting. Proposed lighting will include safety lighting; lighting of pedestrian routes to aid security/surveillance; decorative lighting for landscaping; and lighting to highlight entrances. All lighting will be installed in accordance with applicable Backlight-Uplight-Glare (BUG) standards established by either the Illuminating Engineering Society of North America (IESNA) and/or CALGreen code requirements related to light pollution reduction. General lighting design principles will be sensitive to environmental issues associated with external lighting, such as using energy-efficient lighting and shielding to minimize light trespass. Light will be placed where it is needed, limiting light pollution; site-wide controls, such as astronomical timeclocks and photocells, may be used to switch off lighting when it is no longer in use.
- PDF-AES-2: Non-Reflective Glazing: Glass used in building façades will be anti-reflective or treated with an anti-reflective coating in order to minimize glare (e.g., minimize the use of glass with mirror coatings) and, as recommended by the New York City Audubon Society, minimize bird-strike. Consistent with applicable energy and building code requirements, including Section 140.3 of the California Energy Code as may be amended, glass with coatings required to meet the Energy Code requirements will be permitted.

THRESHOLDS OF SIGNIFICANCE

Appendix G of the CEQA Guidelines, which is a sample Initial Study checklist, includes inquiries regarding the aesthetic-related impacts of proposed projects. It is a common practice for lead agencies to use the inquiries found in Appendix G for purposes of fashioning significance thresholds. Here, the City, in its discretion has so, keeping in mind the policy statements and recommendations found in the City's General Plan, Ordinances, and the FHWA Guidelines, discussed above. Accordingly, an impact on aesthetics is considered significant if implementation of the project would do any of the following:

- have a substantial adverse effect on a scenic vista;
- substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;
- in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality; and/or
- create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

ISSUES NOT DISCUSSED FURTHER

Substantially Damage Scenic Resources, Including, but not Limited to, Trees, Rock Outcroppings, and Historic Buildings within a State Scenic Highway

The project site is not located along a state-designated scenic highway, according to the California State Scenic Highway System Map (Caltrans 2018). According to the California State Scenic Highway System Map, the closest designated scenic highway is the Volcanic Legacy Scenic Byway, located 6.3 miles east of the project site, starting at the intersection of SR 36 and SR 44 (Volcanic Legacy Community Partnership 2020). Therefore, the project site is not visible from a scenic highway.

In addition, as noted earlier, the project site is predominantly flat, is very disturbed and covered with invasive plant species. There are no trees or rock outcroppings on the 14.15-acre site, although there are willow/cottonwoods and

riparian vegetation at the north of the overall parcel adjacent to the Susan River. There is a small hut type building in the middle of the entire parcel, but outside the project limits of disturbance.

Due to distance and intervening structures, there would be no impact on the Volcanic Legacy Scenic Byway and no impact on any officially designated scenic highway as there are none in the project site's vicinity. There would be no impact to trees, rock outcroppings, and historic buildings within a state scenic highway. In addition, the project would not have potential to damage scenic resources scenic highway because construction activities would be limited to the privately-owned parcel and disturbed areas within or adjacent to SR 36 and Skyline Road and within City of Susanville or Caltrans' right of way. The project would not require the removal of any scenic resources, including trees, rock outcroppings, or historic buildings. This issue is not discussed further.

If the Project is in an Urbanized Area, Would the Project Conflict with Applicable Zoning and Other Regulations Governing Scenic Quality?

The project is located in a non-urbanized area. The CEQA Guidelines Section 15387 defines "urbanized area" as "a central city or a group of contiguous cities with a population of 50,000 or more, together with adjacent densely populated areas having a population density of at least 1,000 persons per square mile." Susanville, which in 2022 had a population estimated at 15,737 (U.S. Census 2022), does not fall within this definition. A brief assessment of whether the project conflicts with applicable zoning and other regulations governing scenic quality has been undertaken. As identified in the Susanville Vicinity Area Plan Land Use section, the project site is classified as an agricultural land use. However, under the Industrial subsection, it is noted that locating additional industry on the land across the Southern Pacific Railroad tracks north of Sierra Road "…is logical since there is ample land for new development. Additional industrial land uses would also be compatible with surrounding land uses." (Lassen County 1984: 41). The current Lassen County General Plan and Area Plan Land Use designation for the project site, which is within the Susanville Vicinity Area Plan area, is Industrial Park. The project site has a typical corresponding zoning district of Limited Industrial District (M-L). However, as part of the project, the project applicant proposes that the City annex the site into the City of Susanville's jurisdiction and amend the General Plan to show a Commercial Shopping Center designation on the property and amend the zoning to show a General Commercial Shopping District (C-2) designation. Upon annexation, General Plan amendment, rezoning and conditional use permit application, the use of the project site as a Travel Stop would be consistent with the land use and zoning and compatible with the intent of the Commercial Shopping Center/C-2 designation. The City's Manager has advised the project applicant that the proposed project would be consistent with these designations. Although the list of conditionally permitted uses within the C-2 zone does not expressly mention a truck and travel stop, section 17.36.030 of the City's Municipal Code does include the following similar uses: "Service station"; "Fast food restaurant, including drive-in and drive-through restaurants, [and] drive-through establishments"; "Recreation vehicle park"; and "Any shopping center 80,000 square feet or larger in size (includes all buildings within the shopping center)." Moreover, section 17.36.040 of the City's Municipal Code provides that the C-2 district permits "Other uses permitted in the C-2 district are uses found to be similar in character and impact to those listed in Sections 17.36.020 and 17.36.030 as determined by the community development director." Given that the proposed project includes specific components that section 17.36.030 expressly authorized as conditionally permitted uses, the City's Manager has determined pursuant to section 17.36.040 that the overall proposed project is "similar in character and impact" to those specifically enumerated land uses. The proposed General Plan and zoning amendments would ensure the project is consistent with the City's land use designation and zoning district, which by right would ensure no conflict with applicable zoning and other regulations governing scenic quality. This issue is not discussed further.

Create a New Source of Substantial Light or Glare Which Would Adversely Affect Day or Nighttime Views in the Area

The project site is located within a rural area but characterized by moderate ambient nighttime lighting levels due to proximity to the City of Susanville and to vehicles traveling on SR 36. Additionally, as previously mentioned, there is already lighting present within the project's vicinity at the SR 36/Skyline Road and SR 36/Riverside Drive intersections for safety purposes. As discussed in the Project Description of this Draft EIR, construction activities would be short-term and would generally occur during daytime hours. However, security lighting may be used onsite at night and

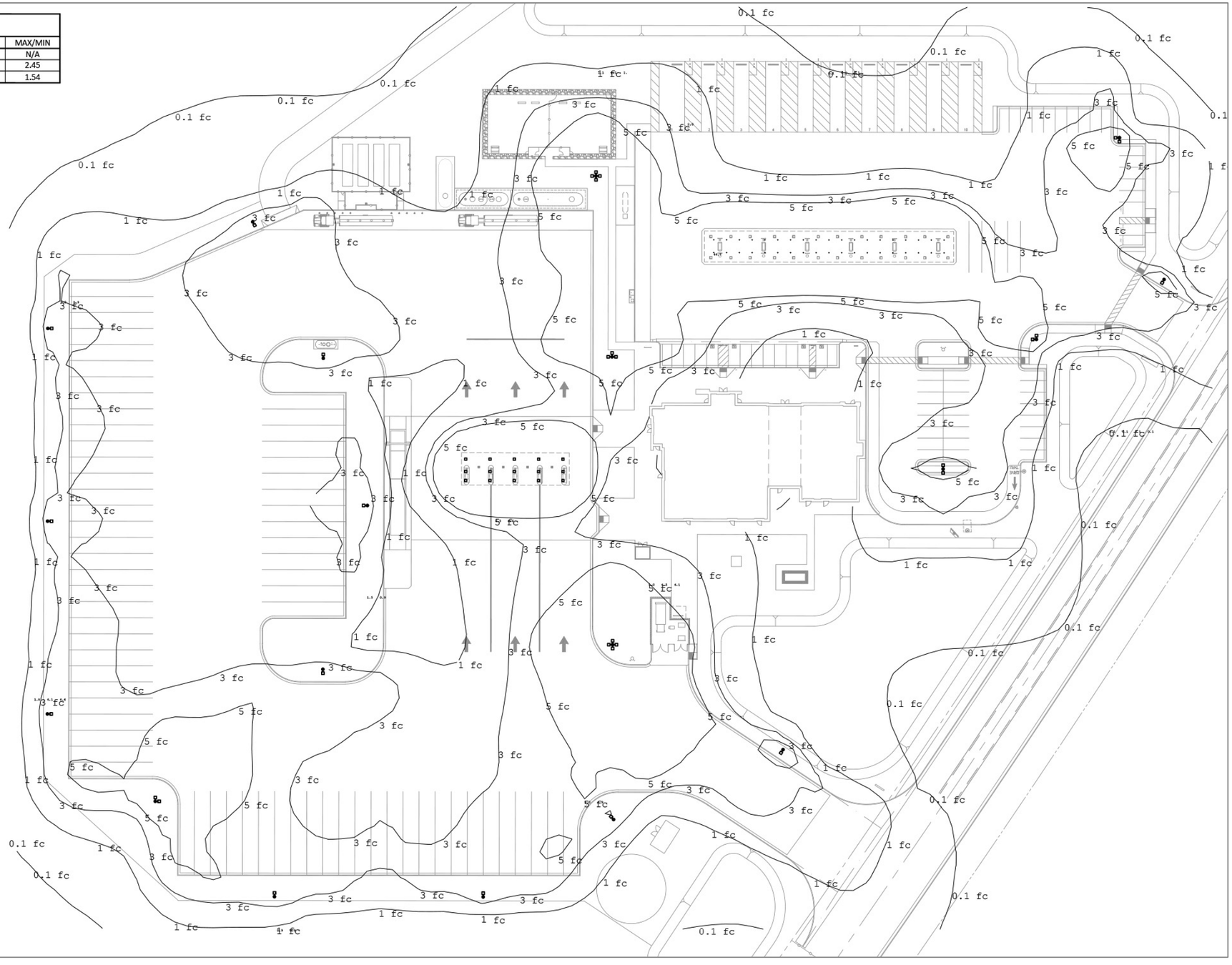
would represent a new source of temporary lighting on the west side of SR 36 at its crossing with Skyline Road. If security lighting is needed, it would be shielded and projected downward to minimize spillover effects on adjacent roadways, in accordance with City of Susanville Code of Ordinances Section 17.96.050, Lighting.

Once operational, the project would include onsite lighting, consisting of high-mast light-emitting diode (LED) fixtures and LED canopy lighting. In addition, signs for the travel stop, convenience store and fast-food restaurant building would be illuminated. Interior lighting would also be noticeable at nighttime through building windows. Offsite utilities would likely be buried underground (with the exception of the portions hung on bridges over the Susan River) but these would not be illuminated and would not introduce new sources of lighting along their alignment. Additionally, as mentioned previously, the project would be built in accordance with City of Susanville Code of Ordinances, Section 17.96.050, Lighting. According to the project's photometrics plan (Figure 3.1-5), lighting levels would be 1 footcandle (10.76 lux) or less at the edges of the project site, before fading to 0.0 footcandles at the SR 36 right-of-way and by the former railroad embankment, at a distance of approximately 80 to 100 ft from the edge of the Project site. For comparison, 1 footcandle is approximately equal to twilight conditions and 0.1 footcandle is approximately equal to deep twilight conditions. As such, lighting levels would not be so bright as to cause substantial light that would adversely affect nighttime views from nearby sensitive receptors. Furthermore, applicable Backlight-Uplight-Glare (BUG) standards established by either the Illuminating Engineering Society of North America (IESNA) or CALGreen code requirements related to light pollution reduction (see CALGreen 2022, Chapter 5, Section 5.106.8) would be adhered to, per Project Design Feature PDF-AES-1. The primary goal of the BUG standards is to reduce light pollution and skyglow. It should also be noted that per Section 13531 of the Business and Professions Code (BPC), the sale of any motor vehicle fuel to the public from any place of business shall display on the premises an advertising medium that complies with the requirements of the BPC and advertises the total prices of the three major grades of motor vehicle fuel offered for sale. This sign shall be clearly visible from the street or highway adjacent to the premises. When the place of business is situated at an intersection, the advertising medium shall be clearly visible from each street of the intersection. As such, the illumination of the high-rise side is a necessity associated with compliance with the BPC requirements. In terms of automobile and truck headlights and associated light spill, due to the former railroad embankment being at an elevation approximately 6 ft greater than the site elevation, the orientation of the site plan, and intervening on site structures, there should not be any greater light spill than is currently experienced with vehicles travelling on SR 36 and Skyline Road. Overall, compliance with existing regulations and standards and implementation of PDF-AES-1 would ensure that impacts regarding project lighting are less than significant as they would ensure that light levels at property lines would not create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area.

In terms of glare, glare occurs from sunlight reflected from reflective materials utilized in existing buildings along the adjacent roads and from vehicle windows and surfaces. Glare-sensitive receptors include the residential uses surrounding the project site and motorists on SR 36. As glare is a temporary phenomenon that changes with the movement of the sun, receptors other than motorists are generally less sensitive to glare impacts than to light impacts. Construction equipment and vehicles would be temporarily present within the project site. Glare from these surfaces would be minor and would not adversely affect daytime views. Once operational, the project would not include building materials or surfaces that would create substantial sources of glare. Additionally, the offsite utilities would be buried underground apart from crossing the Susan River where they would be hung from the bridges, and would not introduce new sources of glare along its alignment. Vehicles within the project site would reflect small amounts of sunlight, introducing marginal sources of spillover glare. Any glass fenestration incorporated into the project's components would be designed with low-reflectivity values (no mirror-like tints or films), as recommended by the New York City Audubon Society (2007) to minimize glare and bird-strike as specified in PDF-AES-2; and additionally, adherence to Chapter 5, Section 5.106.8.2 of the CALGreen code would aid minimizing off-site glare. To the extent glare is experienced by adjacent uses or the occupants of vehicles on nearby streets, it would be minimal and temporary, changing with the movement of the sun throughout the course of the day and the seasons of the year. As mentioned, adherence to CALGreen code and IESNA BUG standards would also help minimize glare to the maximum extent feasible. This issue is not discussed further.

CALCULATION SUMMARY							
LABEL	CALC TYPE	UNITS	AVG	MAX	MIN	AVG/MIN	MAX/MIN
OVERALL SITE	ILLUMINATIONS	FC	2.25	41.6	0.00	N/A	N/A
AUTO CANOPY	ILLUMINATIONS	FC	54.18	91.8	37.4	1.45	2.45
TRUCK CANOPY	ILLUMINATIONS	FC	42.51	51.7	33.6	1.27	1.54

SITE LIGHTING POLE HEIGHTS
TYPE 'BB' ..... 30'-0"
TYPE 'CC' ..... 30'-0"
TYPE 'DD' ..... 39'-0"
TYPE 'EE' ..... 39'-0"
TYPE 'PP' ..... 10'-0"



Source: Harrison French & Associates, 2024. Adapted by Ascent 2024.

Figure 3.1-5 Photometrics Plan

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 3.1-1: Have a Substantial Adverse Effect on a Scenic Vista

The project site is visible from a scenic vista. However, the project would not be prominent in the scenic vista because it is relatively small in comparison to the viewshed, at an oblique angle from the viewpoint, and would be compatible with nearby rural development. The project would result in a **less-than-significant** impact on scenic vistas.

The discussion below addresses whether the segment of SR 36 on which the project site is located includes "scenic vistas" or is considered a "scenic highway"; considers the potential effects on views from both SR 36 and nearby trails; and addresses potential effects due to both project construction and project operation.

A scenic vista is generally defined as a public viewpoint that provides expansive views of a highly valued landscape for the benefit of the public. As confirmed by the Biological Resources site walkover undertaken on June 27, 2024 (see Section 3.3, Biological Resources, of this Draft EIR for details), the 14.15-acre site is predominantly flat and is very disturbed and covered with invasive plant species. The project site is also similar in nature to other nearby parcels, such as land opposite the project site to the east of SR 36 and between Susan River and Gold Run Creek. As such, the view of the project site itself is not considered particularly attractive nor distinct from other nearby parcels. There are no trees or rock outcroppings on the site, although there are willow/cottonwoods and riparian vegetation at the north of the larger 79.6-acre parcel adjacent to the Susan River, which would remain unaffected by the proposed project. A barn building previously occupied part of the site but was demolished at some point between July and August 2019. There is also a small hut type building in the middle of the larger parcel, but outside the project limits of disturbance. The presence of the small hut does not add any scenic value to the project site, especially against the backdrop of the prefabricated construction company lumber yard to the west.

With regard to scenic areas in the project's vicinity, Riverside Park is the closest (approximately 1 mile northwest at Riverside Drive/Limoneria Avenue) and the Bizz Johnson National Recreation Trail - Susanville Trailhead is located 1.6 miles northwest of the project site at the Susanville Depot on North Railroad Avenue/Richmond Road and represents the eastern end of the trail. Due to the prefabricated construction company lumber yard to the east of the park, the project site is not visible from Riverside Park. The Bizz Johnson National Recreation Trail connects Susanville with Mason Station, a railroad junction 4.5 miles north of Westwood (BLM 2021). The trail is a 25.4 mile "rail trail" as it follows the former Southern Pacific Railroad grade through the Susan River Canyon and also hosts an annual marathon and ultra-marathon race along the route. However, as the trail heads west from Susanville, it is in a canyon and the trail crosses the Susan River 12 times, before cresting at 5,580 feet at Westwood Junction, thus the project site is not easily visible from the trail. Furthermore, the project would not preclude any future extension of the trail to the High Dessert Prison, as suggested in the Lassen County Bikeway Master Plan (Lassen County Transportation Commission 2011) nor the Skyline – Bizz Connection proposed in the Lassen County Regional Transportation Plan (Lassen County Transportation Commission 2023). As such, the project site is not easily visible from the existing trail and details regarding the plans (such as design, construction, dates etc.) to extend the trail are not currently known, there would be less than significant impacts on the trail or scenic views to/from the trail associated with construction and operation of the project. Additionally, as existing pedestrian and recreational users using the former railroad pathway between Alexander Avenue and SR 36 (which would be the site of the future Bizz Johnson trail extension) already have to pass several commercial enterprises such as the aforementioned lumber yard, Lassen Auto Body, Alpine Beverage and Diamond Truck and Auto, the presence of a truck stop adjacent to SR 36 would be a compatible land use. The truck stop would be a similar, and compatible, land use to what users already experience, especially as users of that section of unofficial trail are already accustomed to the presence of vehicles and trucks on SR 36 and at the businesses identified. Thus viewers would be less sensitive to the presence of a truck stop in addition to the other nearby businesses. The proposed project would be beneficial in that it would allow future trail users to use restroom facilities and replenish supplies at the convenience store/fast food restaurant portions of the project site.

According to the Lassen County General Plan Natural Resources Element (Lassen County 1999), scenic resources are identified as effectively those within Scenic Highway Corridors, noting the "scenic highway includes the road itself and

its right-of-way and the scenic areas traversed as visible from the highway" (Lassen County 1999, Page 3-60). Scenic vistas in relation to the project are therefore chiefly associated with views to the north and south from SR 36. As also noted within the General Plan, there are no State Scenic Highways designated by the State of California in Lassen County and also no official County Scenic Highways, as recognized by the state. Furthermore, the Lassen County General Plan Land Use Map (Lassen County 1999) does not identify the project site within a "Scenic Corridor" but the site is within the Susanville Vicinity Planning Area, which is therefore the key document in determining scenic vistas.

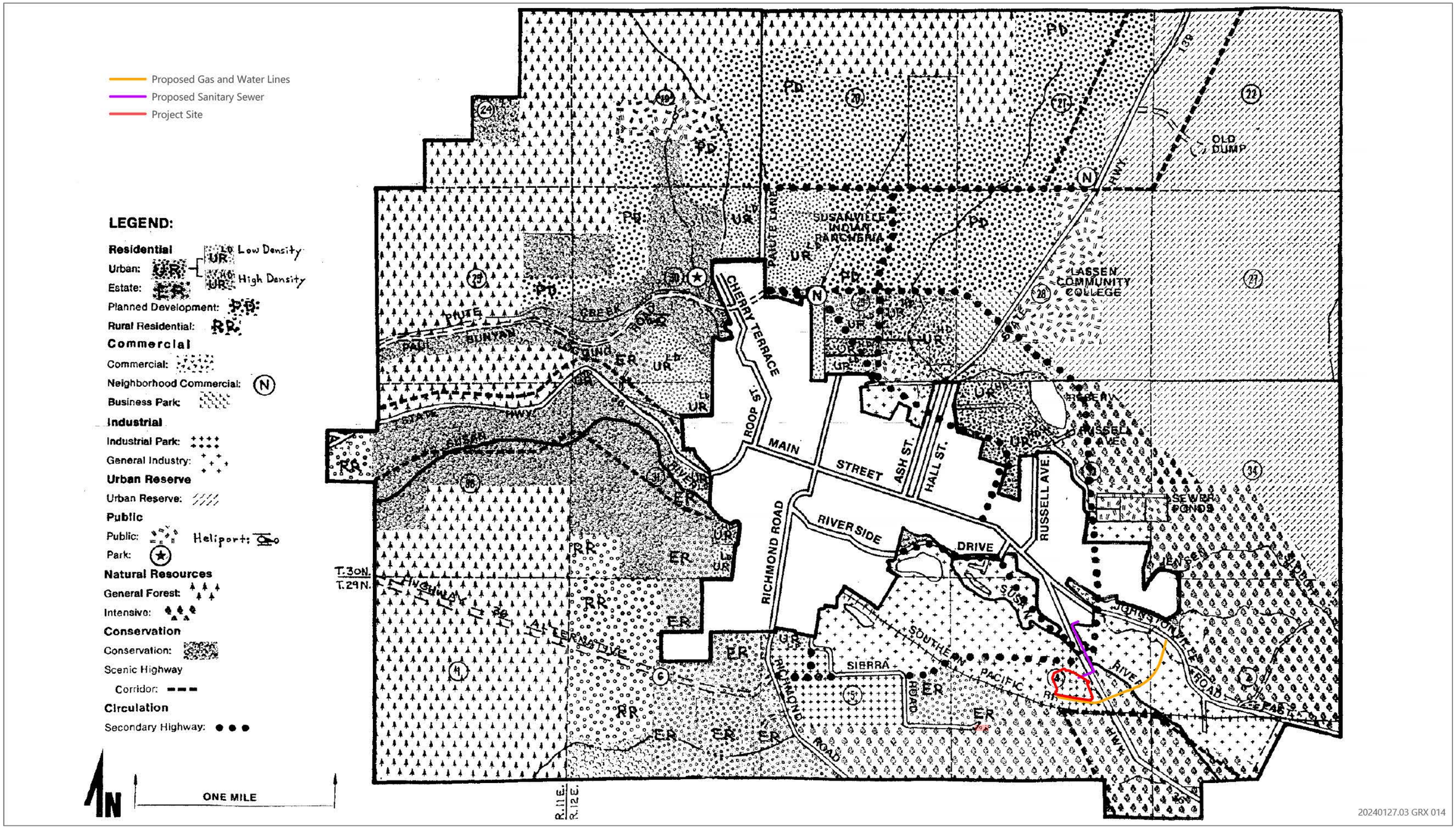
The 1984 Susanville Vicinity Area Plan does not identify any scenic vistas in the vicinity of the city but does identify three areas which, at the time of publication in 1984, could potentially qualify for scenic highway status. These areas included:

- State Highway 139 from the northern end of the planning area to the northern border of Section 28 (Township 30 North, Range 12 East). The area presents a spectacular view of the valley, the Diamond Mountains and the planning area.
- State Highway 36 from the western border of the planning area to the Susanville City limits. This portion of the highway provides tourists with a spectacular view of the valley, the Susan River and the planning area.
- State Highway 36 from the eastern border of the planning area to the Southern Pacific Railroad lines. This area includes sites of agricultural land and the rural character of the Honey Lake Valley.

However, none of these potential scenic highways were officially designated exactly as proposed in the 1984 Susanville Vicinity Area Plan. The closest potential scenic highway corridor to the south of the project site, effectively corresponding to SR 36 from adjacent to the former railroad tracks headed south towards Johnstonville. Although the project site and the offsite utilities are near to the potential scenic highway and would be visible from the potential scenic highway, they are outside the boundary shown on the 1984 Susanville Vicinity Area Plan Land Use Designations Map (Figure 3.1-6). The Susanville Vicinity Area Plan also includes a map of (then existing) Scenic Resources (Map 8 on page 30). The project site is located in an area designated as class "I". The map directs readers to text explaining the designations (I-IV) but the Area Plan does not contain any explanation. The Lassen County General Plan, however, explains the designations and references their inclusion in various area plans. Class I is defined as follows:

> This classification is given to areas having the greatest scenic resource value because of one or more of the following features:
>
> 1. Contains distinctive landscape feature(s).
> 2. Is subject to significant amounts of public exposure, especially in foreground and middleground zones (i.e., along State or U.S. highways).
> 3. Large percentage of observers have high expectations and sensitivity for scenic quality (e.g., recreational tourists).

The Area Plan, however, also acknowledges that the area containing the project site was selected by the City for a future industrial park (as depicted on Figure 3.1-6 below). The County General Plan policies and implementation measures related to scenic resources do not prevent development in scenic areas, but call on the County to develop policies to prevent significant deterioration of visually sensitive areas, and to zone such areas to require design review. It does not appear that the County zoned the project site to require design review. In addition, since SR 36 was proposed as a potential scenic highway, a significant amount of development has occurred in the vicinity, such as the construction of Skyline Road and Riverside Drive and build out along Riverside Drive including the Safeway and McDonald's. As such, the rural character of the area has already been significantly altered and likely would no longer be considered as particularly scenic, nor particularly rural. Views to the north and south from SR 36 would, however, largely remain unaffected by the proposed project as the project is obliquely orientated to SR 36.



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Source: Lassen County 1984, adapted by Ascent 2025.

Figure 3.1-6 1984 Susanville Vicinity Area Plan Land Use Designations

In terms of the general plan corridors identified, during construction, material storage, equipment staging areas and temporary construction worker parking would be located on the project site. No on-street construction worker parking, material storage, or equipment staging would be permitted outside of project limits. Nevertheless, construction equipment such as excavators, dump trucks, cranes, and other construction/hauling equipment has the potential to impact the visual character of the area, as construction of the single-story building and associated project elements would be visible to vehicular users on SR 36, and particularly during installation of offsite utilities alongside SR 36 and Skyline Road. Furthermore, construction would occur over 12 months, occurring in phases, and construction activities would generally be confined to the 14.15-acre project site, with utilities installation and the high-rise sign the only construction occurring outside of the project site. As mentioned, offsite utilities would be alongside SR 36 from Skyline Road to Riverside Drive and from Johnstonville Road/Skyline Road intersection to the project site.

In terms of project operation, the General Plan notes that development is not precluded from occurring within the scenic corridor and, in planned locations, motels, restaurants and certain other commercial services are considered appropriate provided the intensity and location of development does not impair natural scenic qualities and that the design of all development is in character with the natural surroundings. Here, the Project is not located within any scenic corridor identified in the Lassen County General Plan or the Susanville Vicinity Area Plan. Therefore, the travel stop is consistent with the intent of the General Plan. The project would also include a buffer of approximately 130 feet (including a 30 feet utility corridor ROW) from the eastern edge of project development to the Caltrans ROW associated with SR 36. Although the high-rise sign would be installed within this buffer due to BPC requirements, all other project elements apart from offsite utilities would be installed outside the buffer, which would help to create separation from the highway ROW and the project site. The high-rise sign is the tallest aspect of the project, and would be approximately 50 feet taller than the top of the one-story convenience store/fast-food restaurant building. According to the sign survey undertaken for the project, as traffic travels northbound, the sign would be obliquely visible from 0.7-miles south of Riverside Drive/SR 36 intersection, see Figure 3.1-7a. Traveling southbound from Susanville, the high-rise sign would be visible at 0.5-miles from the Riverside Drive/SR 36 intersection, see Figure 3.1-7b. As with construction impacts, visual character impacts experienced from SR 36 would be fleeting as motorists pass by the operational travel stop. As explained within the Project Description section of this Draft EIR, due to the nature of the development (a truck stop serving large semi-trucks), it is imperative that adequate visibility is achieved at a safe distance which allows truck drivers to plan their maneuver and exit SR 36 to turn into the site. Information contained in USSC guidance notes that at 50 miles per hour, the rate at which the viewing distance decreases is 88 feet per second. Because of this rapidly decreasing window of viewing opportunity, roadside sign design, and its height, is critical to traffic safety. As such, the sign height is necessary to enable safe access to the project site. Furthermore, in accordance with Section 13531 and 13532 of the Business and Professions Code, businesses selling gasoline need to adhere to certain requirements including the size of lettering used on the sign and that the sign must be clearly visible from the street or highway adjacent to the premises. The sign must therefore be of a certain size to adhere to those requirements.

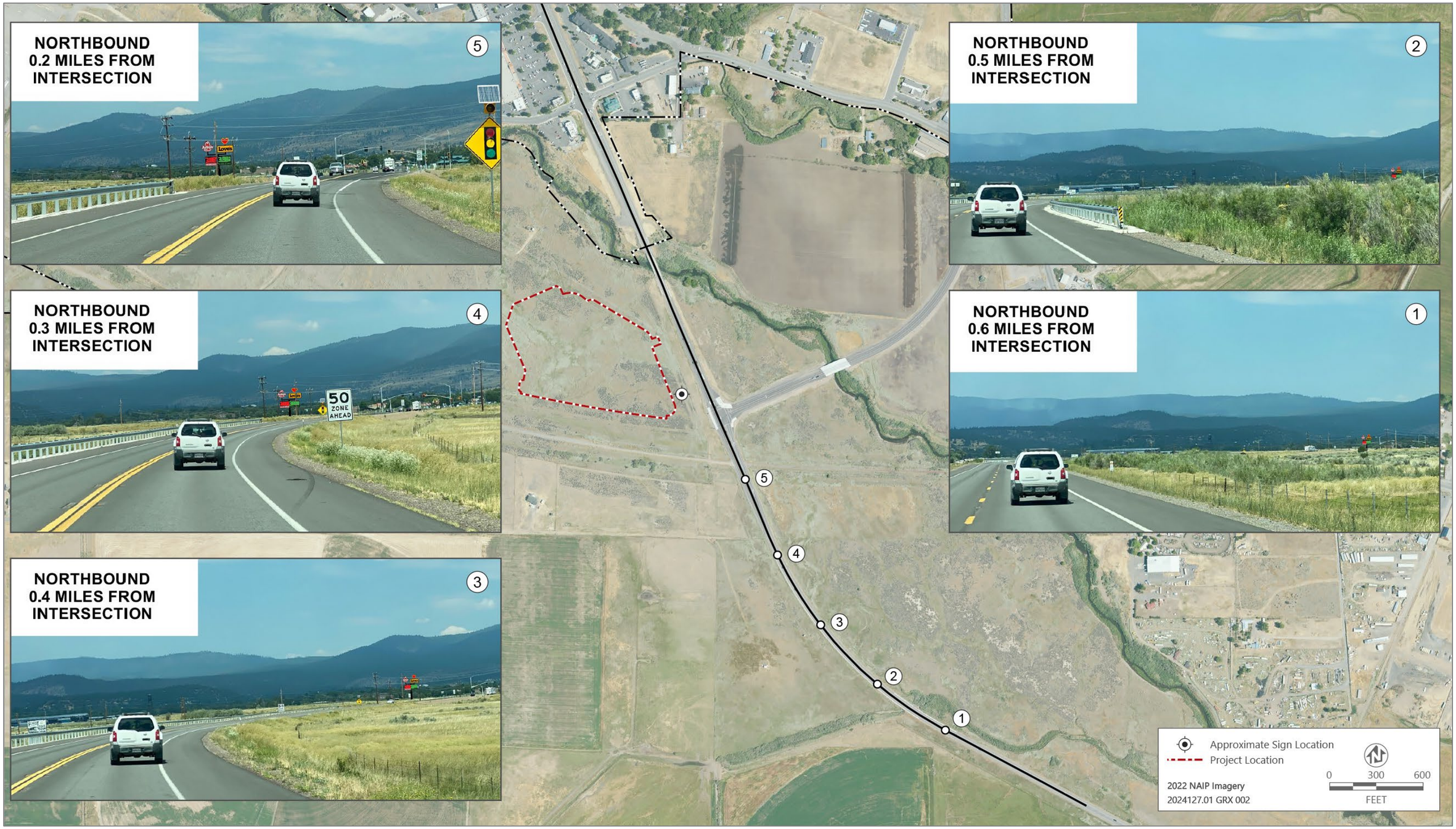
Furthermore, in accordance with the Susanville Vicinity Area Plan Policy 8.12, new development within the scenic highway areas identified would use natural materials and earthtone colors that blend into the landscape, which would help ensure the project is visually coherent with the surrounding landscape (Figure 2-4).

For all of these reasons, development of the project would not have a substantial adverse effect on a scenic vista. Though the project would be visible to passersby, the project is relatively small in comparison to the viewshed and similar in size to other buildings in the vicinity, such that the overall visual effect would not be substantial. Impacts would therefore be **less than significant**.

Mitigation Measures

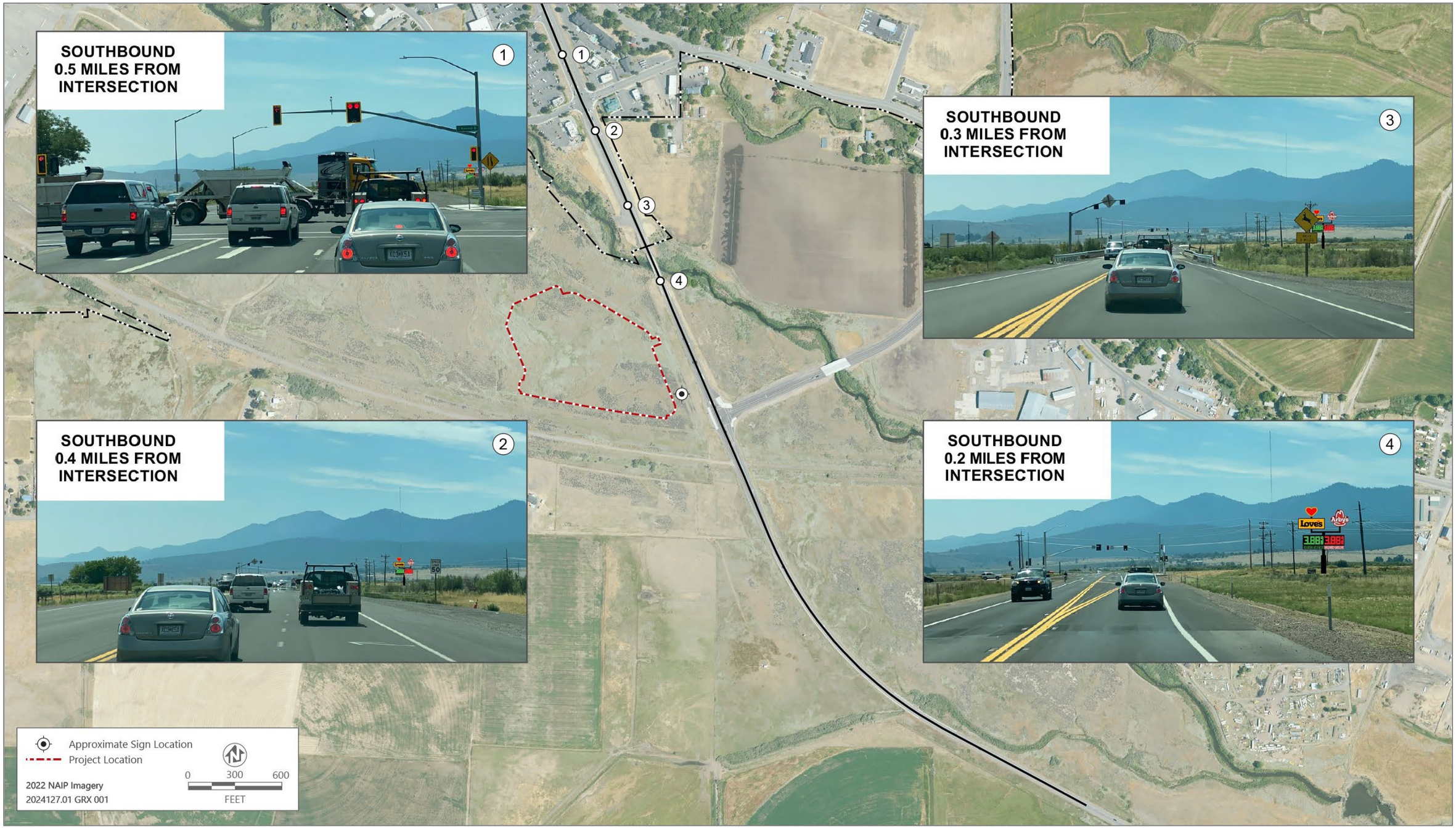
No mitigation is required for this impact.

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Source: Effective Images, Inc. 2021. Adapted by Ascent 2024.

Figure 3.1-7a High Rise Sign Visibility from SR 36 Northbound



Source: Effective Images, Inc. 2021, adapted by Ascent 2024.

Figure 3.1-7b High Rise Sign Visibility from SR 36 Southbound

Impact 3.1-2: In Non-Urbanized Areas, Substantially Degrade the Existing Visual Character or Quality of Public Views of the Site and Its Surroundings? (Public Views are Those that are Experienced from Publicly Accessible Vantage Points)

The project would add non-natural encroaching elements to existing viewpoints. However, the project design would be consistent with the development standards in the City of Susanville Code of Ordinances. Construction equipment has the potential to temporarily impact the visual character, as construction of the single-story building and associated project elements would be visible from sidewalks along Riverside Drive and Skyline Road and from neighboring private residential dwellings and business properties. However, construction would be relatively temporary and would occur over 12 months, in phases, and construction activities would generally be confined to the 14.15-acre project site, with utilities installation the only construction occurring outside of the project site. Once operational, the proposed structures would be of similar height and massing to other rural commercial developments in the area. The structures would not be sizeable enough to substantially disrupt views of the environment and would not be tall enough to block views of surrounding mountains. Views of the new structures and vehicles using the Travel Stop would be predominately limited to motorists traveling at moderate speeds on SR 36; therefore, the duration of views would be relatively short and viewer sensitivity would be low. Therefore, the temporary presence of construction equipment and the permanent introduction of new structures would not dominate or detract from any scenic viewsheds. The project would result in a **less-than-significant** impact on visual character or quality.

The project is located in a non-urbanized area. Thus, the pertinent question is whether the proposed project would substantially degrade the existing visual character or quality of public views of the site and its surroundings. The project site is currently vacant and the truck stop would introduce new elements to the visual environment. However, as mentioned previously, viewer groups of the project site would primarily consist of thru-motorists (e.g., commercial truck drivers, commuters, and tourists) traveling on SR 36 and Skyline Road and nearby residential receptors.

There are limited views of the project site from public locations, apart from chiefly SR 36 and Skyline Road, as discussed previously, as the Bizz Johnson Trail extension has not been constructed or proposed for construction as of the time of this Draft EIR, and there are no views from public parks of the project site. Construction equipment such as excavators, dump trucks, cranes, and other construction/hauling equipment has the potential to temporarily impact the visual character of the area, as construction of the single-story building and associated project elements would be visible from sidewalks along Riverside Drive and Skyline Road and from neighboring private residential dwellings and business properties. Residential dwellings located on Sierra Road (with views northeast) and San Francisco Street (with views southwest), and neighboring business properties would see construction elements (equipment and building construction) relatively proximate, although views from San Francisco Street would be at a much farther distance and thus less visible. Additionally, properties to the south would have their views of construction equipment (and the project elements once operational) lessened to a degree due to the former railroad embankment, which is approximately 5-feet taller than the site's elevation. Due to the potential impact to the existing visual character of the site and its surroundings, a series of visual simulations were prepared, to demonstrate the effect of the completed project on public views in the surrounding area. Each visual simulation figure contains a photograph of existing conditions, which are the same as the viewpoints previously identified in Section 3.1.2 of this Draft EIR, and a proposed visual simulation of what the project would look like once operational. Figure 3.1-8 is a key map, indicating the location of the representative viewpoints. The discussion of view impacts from each location below identifies the characteristics of the changes in views that would occur with construction of the project. As indicated in the discussions below, the project would be visible from numerous locations, however, it would not substantially obstruct or alter an existing recognized or valued public view.



Source: Image produced and provided by VisionScape Imagery in 2025; Adapted by Ascent 2025.

Figure 3.1-8 Viewpoint Key

Visual Simulation Viewpoint 1 (SR 36 looking south from SR 36, north of the Susan River): Visual Simulation Viewpoint 1 (Figure 3.1-9) represents a view across the site from SR 36 looking south/southwest, from a point north of the Susan River. This viewpoint was selected as it is similar to what road users leaving Susanville would see out of their windscreen and obliquely through their passenger-side window. The view field in Figure 3.1-9 has a panoramic view across ruderal vegetation (grazing land) and of Diamond Mountain in the distance. Diamond Mountain is the most significant visual resource from this vantage point. As viewed from this location, the project would represent a new element in the vista, but would only comprise a small portion of the overall view field. The project would not intersect the horizon or block views of Diamond Mountain, which is the key visual element from this location. Through the use of landscaping, the project building would be screened to a large extent, although semi-trailer trucks using the site and the high-rise sign would remain visible. Therefore, the project would not substantially obstruct or alter a valued view from this location. Accordingly, impacts on views from this location would be less than significant.

Visual Simulation Viewpoint 2 (SR 36 looking northwest from south of the SR 36/Skyline Road Intersection): Visual Simulation Viewpoint 2 (Figure 3.1-10) represents a view across the site from northbound SR 36 at a point south of the SR 36/Skyline Road Intersection. This viewpoint was selected as it is similar to what road users approaching the SR 36/Skyline Road Intersection and entering the outskirts of the City of Susanville would see and is representative of a view from the scenic highway corridor (see Figure 3.1-6). The view field in Figure 3.1-10 has a panoramic view across ruderal vegetation (grazing land) and of Roop mountain and Susan Peak in the distance, but is dominated in the foreground by human-made elements such as transmission poles. As viewed from this location, the project would represent a new element in the vista but would only comprise a small portion of the overall view field. The project would not intersect the horizon or block views of Roop Mountain and Susan Peak, which are the key visual elements from this location. Through the use of landscaping, the project building would be screened and would also screen oblique views of the prefabricated construction company buildings and lumber yard. By design, the high-rise sign would remain visible per the requirements of the BPC. Therefore, the project would not substantially obstruct or alter a valued view from this location. Accordingly, impacts on views from this location would be less than significant.



Source: Image produced and provided by VisionScape Imagery in 2025; adapted by Ascent 2025.

Figure 3.1-9 Visual Simulation - Viewpoint 1



Source: Image produced and provided by VisionScape Imagery in 2025; Adapted by Ascent 2025.

Figure 3.1-10 Visual Simulation - Viewpoint 2

Visual Simulation Viewpoint 3 (Skyline Road looking west): Visual Simulation Viewpoint 3 (Figure 3.1-11) represents a view across the site from Skyline Road on approach to the Skyline Road/SR 36 intersection. This viewpoint was selected as it is similar to the view that users of the bicycle lane would see traveling along Skyline Road from Johnstonville Road to SR 36. Distant views from this location are not overly distinct, with rolling hills in the background the most visually appealing aspect. As viewed from this location, the project would represent a new element in the vista, but would only comprise a small portion of the overall view field. The project building would not intersect the horizon or block views of the rolling hills, although the high-rise sign would extend beyond the horizon. Through the use of landscaping, the project building would be screened to a large extent. Therefore, the project would not substantially obstruct or alter a valued view from this location. Accordingly, impacts on views from this location would be less than significant.

Visual Simulation Viewpoint 4 (Former railroad looking northeast): Visual Simulation Viewpoint 4 (Figure 3.1-12) represents a view across the site from the former railroad embankment. This viewpoint was selected as it is similar to the view that users of the future Class I bicycle lane or Bizz Johnson trail extension would see. Additionally, it is the closest publicly accessible viewpoint to the project site that offers similar views to those that would be experienced from residential properties on Sierra Road. As viewed from this location, the project would represent a new element in the vista, and would comprise a large portion of the overall view field, although there are no valued view resources such as unique natural features or human-made elements (such as architecturally or historically notable buildings) present. Buildings located on Riverside Drive are visible from this viewpoint. The project building would not intersect the horizon or block views of the rolling hills, although the high-rise sign would extend beyond the horizon. While landscaped vegetation would screen some of the elements to an extent, such as the canopies for the fueling stations, the project would still be clearly visible from this location. As viewed from this location, the project would not block views to Roop Mountain or Susan Peak. Additionally, the closest residential properties are approximately 400 ft further south and are at an elevation that is approximately 5 ft lower than where the visual simulation photo was taken, thus, some of the project elements would be further obscured by the embankment from the residential properties. Furthermore, according to CEQA case law (see *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477), impacts to private views are not considered to be significant impacts.

While plans to create a future Class I bicycle lane or extend the Bizz Johnson trail have been mooted, no such details such as design, construction details, dates, finances available etc. are currently known or available. As such, there is no guarantee either of these features would be constructed. As such, while the former railroad track does operate as an unofficial recreationalist route, the presence of the project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings, as it is similar to other single-story buildings to the west, which are also visible from the unofficial route. When considering that the visual quality at Viewpoint 4 is moderately low, accordingly, impacts on views from this location would be less than significant.

Regarding construction and operation of the project, construction would be relatively temporary and would occur over 12 months, occur in phases, and construction activities would generally be confined to the 14.15-acre project site, with utilities installation the only construction occurring outside of the project site. Upon completion of the construction period, all construction equipment would be removed from the project site, thus construction impacts would be temporary and would not substantially degrade the existing visual character or quality of public views of the site.

Once operational, some neighboring households and businesses would have a permanent view of the project site. To an extent, upon landscape plantings maturation, the project site would be shielded by landscape vegetation, which would be planted in accordance with Susanville Code of Ordinances 12.36, and certain views may be filtered by vegetation. Businesses and residences are located at varying distances from the project site, and not all are likely to experience direct views. Depending on the viewer's locale (work versus residential), neighboring households and businesses range from major to moderate sensitivity to changes in visual resources. These views tend to be habitual and static views, and therefore, viewers can watch the evolution of changes as they occur.



Source: Image produced and provided by VisionScape Imagery in 2025; Adapted by Ascent 2025.

Figure 3.1-11 Visual Simulation - Viewpoint 3



Source: Image produced and provided by VisionScape Imagery in 2025; Adapted by Ascent 2025.

Figure 3.1-12 Visual Simulation - Viewpoint 4

The nearest residential dwellings would be approximately 600 ft from the travel stop; however, in accordance with City of Susanville Code of Ordinances, Section 17.36.050 Site Development Standards, the maximum permitted structural height in the C-2 district is 40 feet and the single-story building housing the fast-food restaurant and convenience store would be substantially below this at approximately 25 feet (refer to the building elevations shown in Figure 2-4 in Section 2, "Project Description"). The proposed structures would be of similar height and massing to other rural commercial developments in the region. The structures would not be sizeable enough to substantially disrupt views of the environment and would not be tall enough to block views of surrounding mountains. Additionally, the former railroad embankment, which lies 5-feet above the grade of the site, would also help to obscure the development. The development would also be screened to a degree in accordance with City of Susanville Code of Ordinances, Section 12.36 and 17.96.040 Landscaping, which may also filter views of the project. Furthermore, views of the new structures and vehicles using the Travel Stop would be predominately limited to motorists traveling at moderate speeds on SR 36; therefore, the duration of views would be relatively short and viewer sensitivity would be low. Furthermore, the project site is adjacent to SR 36 and in proximity to rural development, including timber yards located 0.3-miles east and 0.7-miles west, which detracts from the aesthetic of surrounding areas. Therefore, the temporary presence of construction equipment and the permanent introduction of new structures would not dominate or detract from any scenic viewsheds. Project construction and operation would be barely noticeable, if noticeable at all, from surrounding mountains. Based on the above discussion, the project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings and impacts would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

3.2 AIR QUALITY

This section includes a discussion of existing air quality conditions, a summary of applicable regulations, and an analysis of potential construction and operational air quality impacts that could be caused by implementation of the proposed project.

No comments in response to the NOP were received that identified concerns regarding air quality impacts.

3.2.1 Regulatory Setting

Air quality in the project area is regulated through the efforts of various federal, State, regional, and local government agencies. These agencies work jointly, as well as individually, to improve air quality through legislation, planning, policy-making, education, and a variety of programs. The agencies responsible for improving the air quality in the project area are discussed below.

FEDERAL

U.S. Environmental Protection Agency

The U.S. Environmental Protection Agency (EPA) has been charged with implementing national air quality programs. EPA's air quality mandates draw primarily from the federal Clean Air Act (CAA), which was enacted in 1970. The most recent major amendments to the CAA were made by Congress in 1990. EPA's air quality efforts address both criteria air pollutants (CAPs) and hazardous air pollutants (HAPs). EPA regulations concerning CAPs and HAPs are presented in greater detail below.

Criteria Air Pollutants

The CAA required EPA to establish national ambient air quality standards (NAAQS) for six common air pollutants found all over the U.S. referred to as criteria air pollutants (CAPs). EPA has established primary and secondary NAAQS for the following criteria air pollutants: ozone, carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), respirable particulate matter with aerodynamic diameter of 10 micrometers or less (PM_{10}) and fine particulate matter with aerodynamic diameter of 2.5 micrometers or less ($PM_{2.5}$), and lead. The NAAQS are shown in Table 3.2-1. The primary standards protect public health and the secondary standards protect public welfare. The CAA also required each state to prepare a State Implementation Plan (SIP) for attaining and maintaining the NAAQS. The federal Clean Air Act Amendments of 1990 (CAA) added requirements for states with nonattainment areas to revise their SIPs to incorporate additional control measures to reduce air pollution. California's SIP is modified periodically to reflect the latest emissions inventories, planning documents, and rules and regulations of the air basins as reported by their jurisdictional agencies. EPA is responsible for reviewing all SIPs to determine whether they conform to the mandates of the CAA and its amendments, and whether implementation will achieve air quality goals. If EPA determines a SIP to be inadequate, EPA may prepare a federal implementation plan that imposes additional control measures. If an approvable SIP is not submitted or implemented within the mandated time frame, sanctions may be applied to transportation funding and stationary air pollution sources in the air basin.

Table 3.2-1 National and California Ambient Air Quality Standards

Pollutant	Averaging Time	California (CAAQS)[a,b]	National (NAAQS)[c] Primary[b,d]	National (NAAQS)[c] Secondary[b,e]
Ozone	1-hour	0.09 ppm (180 µg/m^3	–[e]	Same as primary standard
	8-hour	0.070 ppm (137 µg/m^3)	0.070 ppm (147 µg/m^3)	
Carbon monoxide (CO)	1-hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)	Same as primary standard
	8-hour	9 ppm (10 mg/m^3)	9 ppm (10 mg/m^3)	
Nitrogen dioxide (NO_2)	Annual arithmetic mean	0.030 ppm (57 µg/m^3)	53 ppb (100 µg/m^3)	Same as primary standard
	1-hour	0.18 ppm (339 µg/m^3)	100 ppb (188 µg/m^3)	—
Sulfur dioxide (SO_2)	24-hour	0.04 ppm (105 µg/m^3)	—	—
	3-hour	—	—	0.5 ppm (1300 µg/m^3)
	1-hour	0.25 ppm (655 µg/m^3)	75 ppb (196 µg/m^3)	—
Respirable particulate matter (PM_{10})	Annual arithmetic mean	20 µg/m^3	—	Same as primary standard
	24-hour	50 µg/m^3	150 µg/m^3	
Fine particulate matter ($PM_{2.5}$)	Annual arithmetic mean	12 µg/m^3	9.0 µg/m^3	15.0 µg/m^3
	24-hour	—	35 µg/m^3	Same as primary standard
Lead [f]	Calendar quarter	—	1.5 µg/m^3	Same as primary standard
	30-Day average	1.5 µg/m^3	—	—
	Rolling 3-Month Average	–	0.15 µg/m^3	Same as primary standard
Hydrogen sulfide	1-hour	0.03 ppm (42 µg/m^3)	No National standards	
Sulfates	24-hour	25 µg/m^3		
Vinyl chloride [f]	24-hour	0.01 ppm (26 µg/m^3)		
Visibility-reducing particulate matter	8-hour	Extinction of 0.23 per km		

Notes: µg/m^3 = micrograms per cubic meter; km = kilometers; ppb = parts per billion; ppm = parts per million.

A California standards for ozone, carbon monoxide, SO_2 (1- and 24-hour), NO_2, particulate matter, and visibility-reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

B Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based on a reference temperature of 25 degrees Celsius (°C) and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

C National standards (other than ozone, particulate matter, and those based on annual averages or annual arithmetic means) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration in a year, averaged over three years, is equal to or less than the standard. The PM_{10} 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m^3 is equal to or less than one. The $PM_{2.5}$ 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. Environmental Protection Agency for further clarification and current federal policies.

D National primary standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

E National secondary standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

F The California Air Resources Board has identified lead and vinyl chloride as toxic air contaminants with no threshold of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

Source: CARB 2016, EPA 2024a.

Hazardous Air Pollutants and Toxic Air Contaminants

Toxic air contaminants (TACs), or in federal parlance, hazardous air pollutants (HAPs), are a defined set of airborne pollutants that may pose a present or potential hazard to human health. A TAC is defined as an air pollutant that may cause or contribute to an increase in mortality or in serious illness, or that may pose a hazard to human health. TACs are usually present in minute quantities in the ambient air; however, their high toxicity or health risk may pose a threat to public health even at low concentrations.

A wide range of sources, from industrial plants to motor vehicles, emit TACs. The health effects associated with TACs are quite diverse and generally are assessed locally, rather than regionally. TACs can cause long-term health effects such as cancer, birth defects, neurological damage, asthma, bronchitis, or genetic damage; or short-term acute affects such as eye watering, respiratory irritation (a cough), running nose, throat pain, and headaches.

For evaluation purposes, TACs are separated into carcinogens and non-carcinogens based on the nature of the physiological effects associated with exposure to the pollutant. Carcinogens are assumed to have no safe threshold below which health impacts would not occur. This contrasts with criteria air pollutants for which acceptable levels of exposure can be determined and for which the ambient standards have been established (Table 3.2-1). Cancer risk from TACs is expressed as excess cancer cases per one million exposed individuals, typically over a lifetime of exposure.

EPA regulates HAPs through its National Emission Standards for Hazardous Air Pollutants. The standards for a particular source category require the maximum degree of emission reduction that the EPA determines to be achievable, which is known as the Maximum Achievable Control Technology—MACT standards. These standards are authorized by Section 112 of the 1970 Clean Air Act and the regulations are published in 40 CFR Parts 61 and 63.

EPA and, in California, the California Air Resources Board (CARB) regulate HAPs and TACs, respectively, through statutes and regulations that generally require the use of the maximum available control technology (MACT) or best available control technology (BACT) for air toxics to limit emissions.

STATE

CARB is the agency responsible for coordination and oversight of State and local air pollution control programs in California and for implementing the California Clean Air Act (CCAA). The CCAA, which was adopted in 1988, required CARB to establish California ambient air quality standards (CAAQS) (Table 3.2-1).

Criteria Air Pollutants

CARB has established CAAQS for sulfates, hydrogen sulfide, vinyl chloride, visibility-reducing particulate matter, and the above-mentioned criteria air pollutants. In most cases the CAAQS are more stringent than the NAAQS. Differences in the standards are generally explained by the health effects studies considered during the standard-setting process and the interpretation of the studies. In addition, the CAAQS incorporate a margin of safety to protect sensitive individuals.

The CCAA requires that all local air districts in the state endeavor to attain and maintain the CAAQS by the earliest date practical. The CCAA specifies that local air districts should focus particular attention on reducing the emissions from transportation and area-wide emission sources. The CCA also provides air districts with the authority to regulate indirect sources.

Toxic Air Contaminants

TACs in California are regulated primarily through the Tanner Air Toxics Act (Assembly Bill [AB] 1807, Chapter 1047, Statutes of 1983) and the Air Toxics Hot Spots Information and Assessment Act of 1987 (AB 2588, Chapter 1252, Statutes of 1987). AB 1807 sets forth a formal procedure for CARB to designate substances as TACs. Research, public participation, and scientific peer review are required before CARB can designate a substance as a TAC. To date, CARB has identified more than 21 TACs and adopted EPA's list of HAPs as TACs. Most recently, particulate matter (PM) exhaust from diesel engines (diesel PM) was added to CARB's list of TACs.

After a TAC is identified, CARB then adopts an airborne toxics control measure for sources that emit that particular TAC. If a safe threshold exists for a substance at which there is no toxic effect, the control measure must reduce exposure below that threshold. If no safe threshold exists, the measure must incorporate BACT for toxics to minimize emissions.

The Hot Spots Act requires that existing facilities that emit toxic substances above a specified level prepare an inventory of toxic emissions, prepare a risk assessment if emissions are significant, notify the public of significant risk levels, and prepare and implement risk reduction measures.

AB 617 of 2017 (California Health and Safety Code Section 39607.1) aims to help protect air quality and public health in communities around stationary sources of pollution including facilities subject to the State's cap-and-trade program for GHG emissions. AB 617 imposes a new State-mandated local program to address non-vehicular sources (e.g., refineries, manufacturing facilities) of criteria air pollutants and TACs. AB 617 requires CARB to identify high-pollutant areas and directs air districts to focus air quality improvement efforts through adoption of community emission reduction programs within these identified areas. Currently, air districts review individual sources and impose emissions limits on emitters based on BACT, pollutant type, and proximity to nearby existing land uses. AB 617 addresses the cumulative and additive nature of air pollutant health effects by requiring community-wide air quality assessment and emission reduction planning.

CARB has adopted diesel exhaust control measures and more stringent emissions standards for various transportation-related mobile sources of emissions, including transit buses, and off-road diesel equipment (e.g., tractors, generators). Over time, the replacement of older vehicles will result in a vehicle fleet that produces substantially lower levels of TACs than under current conditions. Mobile-source emissions of TACs (e.g., benzene, 1-3-butadiene, diesel PM) have been reduced significantly over the last decade and will be reduced further in California through a progression of regulatory measures (e.g., Low Emission Vehicle/Clean Fuels and Phase II reformulated gasoline regulations) and control technologies. With implementation of CARB's Risk Reduction Plan (CARB 2000) and other regulatory programs, it is estimated that emissions of diesel PM will be less than half of those in 2010 by 2035 (CARB 2023a). Adopted regulations are also expected to continue to reduce formaldehyde emissions emitted by cars and light-duty trucks. As emissions are reduced, it is expected that risks associated with exposure to the emissions will also be reduced.

LOCAL

Lassen County Air Pollution Control District

The Lassen County Air Pollution Control District (LCAPCD) manages the local air quality for the Lassen County Region and regulates the stationary sources of air pollution, administers grant programs and permits, and enforces state, local, and federal air pollution laws and regulation in Lassen County. Projects located in the LCAPCD are subject to LCAPCD's rules and regulations. Specific rules applicable to the project include Rule 6:4, "Requirements," which subjects any project within LCAPCD's jurisdiction to the following requirements:

- Best Available Control Technology Requirements (BACT) - An applicant shall apply BACT to a new source or modification of an existing source, except cargo carriers, for each affected pollutant emitted, including halogenated hydrocarbons, under the following conditions:

    1. A new stationary source emits more than 68 kg (150 lbs.) per day of reactive organic compounds or nitrogen oxides or sulfur oxides or particulate matter; or 249 kg (550 lbs.) per day of carbon monoxide; or 1,450 g (3.2 lbs.) per day of lead, or 0.04 lbs/day of asbestos; or 0.0022 lbs/day of beryllium; or 0.55 lbs/day of mercury; or 5.48 lbs/day of vinyl chloride; or 16.44 lbs/day of fluorides; or 38.35 lbs/day of sulfuric acid mist; or 54.79 lbs/day of hydrogen sulfide or total reduced sulfur or sulfur compounds.
    2. A modification of an existing stationary source will result in a net emissions increase of an affected pollutant by an amount in excess of any of the limits stated in Section 6.4(a)(1).
    3. A new source or modification subject to BACT for any pollutant subject to this section shall apply BACT for any other affected pollutant emitted from the new source or modification, if the Air Pollution Control Officer should so require.

Lassen County General Plan

The County's General Plan was adopted in 1999 and contains the following policies related to air quality that are applicable to the project (Lassen County 1999).

- LU-1 Policy: This Land Use Element includes the enclosed "Land Use Map" which provides a graphic representation of the land use designations described in this Element and which are referred to in other elements of the General Plan. Special consideration, as described below, shall be given to land located within designated

planning areas as described in adopted area plans. Descriptions of the land use designations used on this map and as are used in the County's area plans are included in Section Three of this Element.

- **LU-2 Policy**: Adopted area plans contain general plan policies which apply, as relevant, to lands within particular planning areas. Because of the greater level of detail achieved in area plans, their land use designations, policies and related provisions are more specific than set forth in the Land Use Element and other elements of the General Plan. Wherever a goal, objective, policy, land use designation, and/or implementation measure of an area plan may be more specific or detailed than a corresponding provision of the General Plan, including any within the Land Use Element, such a provision of the area plan shall be deemed to be a refinement of the General Plan pertaining to the particular planning area.
- **LU-4 Policy**: The County shall consider relevant policies of the Natural Resources Element, the Open Space Element, the Agriculture Element, the Wildlife Element, the Energy Element, and other applicable general plan elements in making land use decisions which may affect open space and natural resources.
- **LU-6 Policy**: The County recognizes general plan land use designations and consistent zoning as the appropriate and primary tools for attempting to achieve and maintain compatibility of land uses within the context of the County's land use authority and local control.
- **NR74 Policy:** The Board of Supervisors will continue to consider, adopt, and enforce feasible air quality standards which protect the quality of the County's air resources.
- **NR75 Policy:** The County shall consider the appropriateness and feasibility of air pollution control requirements for individual projects and may grant variances to specific requirements pursuant to established procedural guidelines.
- **NR76 Policy:** Federal and state agencies shall be encouraged to assist the County in protecting the quality of its air resources.
- **NR77 Policy:** In the course of adopting policies pertaining to air resources in other County planning elements and plan areas, the County may consider additional and more particular policies and measures to protect the quality of air resources.

Susanville General Plan

Susanville's General Plan was adopted in 1991 and the City is in the process of updating the various elements of the General Plan. As of mid-2025, the City has adopted updates to the Land Use, Circulation, and Housing Elements, and plans to update the remaining elements. Because the City has not completed the update to Community Health, Safety, and Conservation Element, this analysis relies on the current version of that element, adopted in 1991, which contains the following policies related to air quality that are applicable to the project (City of Susanville 1991):

- **Policy e:** Adhere to federal or State Air Quality Standards, whichever are more stringent.
- **Policy f**: Susanville's air quality shall not diminish beyond its current level during the winter.
- **Policy g**: The City shall consider the maintenance and improvement of air quality as part of development review for new construction and/or expansion of existing uses or structures.
- **Policy h**: The City shall undertake practices to improve Susanville's air quality, including reducing the emission of particulate matter from wood fires in stoves and fireplaces.
- **Action program [9]**: Locate air pollution point sources such as manufacturing and extracting facilities away from residential areas and sensitive receptors.
- **Action program [12]**: Encourage all new construction to include geothermal heating or active or passive solar heating, and educate developers and homeowners regarding the availability and advantages of alternative heating sources.
- **Action program [17]**: Establish a benchmark identifying the Susanville area's current air quality, and monitor air quality continually to measure its improvement.

- Action Program [19]: Urge the Lassen County Air Pollution Control District to adopt equivalent measures and programs.

3.2.2 Environmental Setting

The project site is located in the Northeast Plateau Air Basin (NEPAB) within Unincorporated Lassen County. The NEPAB includes Lassen, Modoc, and Siskiyou counties. The ambient concentrations of air pollutant emissions are determined by the amount of emissions released by the sources of air pollutants and the atmosphere's ability to transport and dilute such emissions. Natural factors that affect transport and dilution include terrain, wind, atmospheric stability, and sunlight. Existing air quality conditions in the area are determined by such natural factors as topography, meteorology, and climate, in addition to the amount of emissions released by existing air pollutant sources, as discussed separately below.

CLIMATE, METEOROLOGY, AND TOPOGRAPHY

Atmospheric conditions such as wind speed, wind direction, and air temperature gradients interact with the physical features of the landscape to determine the movement and dispersal of air pollutants. The NEPAB contains an assortment of mountain ranges and forests. Prevailing winds in the NEPAB are out of the west and southwest. These prevailing winds are due to the proximity of the NEPAB to flat regions and the blocking nature of the Sierra Nevada mountains to the north (WRCC 2025).

The local meteorology of the project site and surrounding area is represented by measurements recorded at the Western Regional Climate Center (WRCC) Susanville Muni AP Station. The normal annual precipitation is approximately 15.04 inches. January temperatures range from a normal minimum of 20.9°F to a normal maximum of 40.5°F. July temperatures range from a normal minimum of 50.8°F to a normal maximum of 88.7°F (WRCC 2016). Wind direction in Susanville varies throughout the year but is most often from the west from March to November (Weather Spark 2020).

CRITERIA AIR POLLUTANTS

Concentrations of criteria air pollutants are used to indicate the quality of the ambient air. A brief description of key criteria air pollutants in the NEPAB is provided below. Lassen County's attainment status for the CAAQS and the NAAQS are shown in Table 3.2-2. Monitoring data applicable to the project site is provided in Table 3.2-3.

Ozone

Ground-level ozone is not emitted directly into the air but is created by chemical reactions between reactive organic gases (ROG) and nitrogen oxides (NO_X). This happens when pollutants emitted by cars, power plants, industrial boilers, refineries, chemical plants, and other sources chemically react in the presence of sunlight. Ozone at ground level is a harmful air pollutant because of its effects on people and the environment and is the main ingredient in smog (EPA 2023).

Acute health effects of ozone exposure include increased respiratory and pulmonary resistance, cough, pain, shortness of breath, and lung inflammation. Chronic health effects include permeability of respiratory epithelia and possibility of permanent lung impairment (EPA 2023). Emissions of the ozone precursors ROG and NO_X have decreased over the past two decades because of more stringent motor vehicle standards and cleaner burning fuels (CARB 2013a).

Nitrogen Dioxide

NO_2 is a brownish, highly reactive gas that is present in all urban environments. The major human-made sources of NO_2 are combustion devices, such as boilers, gas turbines, and mobile and stationary reciprocating internal combustion engines. Combustion devices emit primarily nitric oxide (NO), which reacts through oxidation in the atmosphere to form NO_2. The combined emissions of NO and NO_2 are referred to as NO_X and are reported as equivalent NO_2. Because NO_2

is formed and depleted by reactions associated with photochemical smog (ozone), the NO_2 concentration in a particular geographical area may not be representative of the local sources of NO_X emissions (EPA 2023).

Acute health effects of exposure to NO_X includes coughing, difficulty breathing, vomiting, headache, eye irritation, chemical pneumonitis, or pulmonary edema, breathing abnormalities, cough, cyanosis, chest pain, rapid heartbeat, and death. Chronic health effects include chronic bronchitis and decreased lung function (EPA 2023).

Particulate Matter

Respirable particulate matter with an aerodynamic diameter of 10 micrometers or less is referred to as PM_{10}. PM_{10} consists of particulate matter emitted directly into the air, such as fugitive dust, soot, and smoke from mobile and stationary sources, construction operations, fires and natural windblown dust, and particulate matter formed in the atmosphere by reaction of gaseous precursors (CARB 2013a). Fine particulate matter ($PM_{2.5}$) includes a subgroup of smaller particles that have an aerodynamic diameter of 2.5 micrometers or less. PM_{10} emissions in the NEPAB are dominated by emissions from area sources, primarily fugitive dust from vehicle travel on unpaved and paved roads, farming operations, construction and demolition, and particles from residential fuel combustion. Direct emissions of PM_{10} are projected to remain relatively constant through 2035. Direct emissions of $PM_{2.5}$ have steadily declined in the NEPAB between 2000 and 2010 and then are projected to increase very slightly through 2035. Emissions of $PM_{2.5}$ in the NEPAB are dominated by the same sources as emissions of PM_{10} (CARB 2013a).

Table 3.2-2 Attainment Status Designations for the Northeast Plateau Air Basin

Pollutant	National Ambient Air Quality Standard[1]	California Ambient Air Quality Standard[1]
Ozone	Attainment (1-hour)[2]	(No State Standard for 1-hour)
	Attainment (8-hour)	Attainment (8-hour)
Respirable particulate matter (PM_{10})	Unclassified (24-hour)	Unclassified (24-hour)
		Unclassified (Annual)
Fine particulate matter ($PM_{2.5}$)	Unclassified/Attainment (24-hour)	(No State Standard for 24-Hour)
	Unclassified/Attainment (Annual)	Attainment (Annual)
Carbon monoxide (CO)	Unclassified/Attainment (1-hour)	Unclassified
	Unclassified/Attainment (8-hour)	Unclassified
Nitrogen dioxide (NO_2)	Unclassified/Attainment (1-hour)	Attainment (1-hour)
	Unclassified/Attainment (Annual)	Attainment (Annual)
Sulfur dioxide (SO_2)	Unclassified/Attainment (1-Hour)	Attainment (1-hour)
		Attainment (24-hour)
Lead (Particulate)	Attainment (3-month rolling avg.)	Attainment (30 day average)
Hydrogen Sulfide	No Federal Standard	Unclassified (1-hour)
Sulfates		Attainment (24-hour)
Visibly Reducing Particles		Unclassified (8-hour)
Vinyl Chloride		Unclassified (24-hour)

[1] "Attainment" signifies that an area meets or is cleaner than the national standard. "Unclassified/Attainment" signifies that an area either meets or is likely meeting the NAAQS for a specific pollutant, or there are insufficient data to definitively classify it as either attainment or nonattainment. Where CARB or EPA are unable to determine an area's status after evaluating the available information, those areas are designated "unclassified".

[2] Air Quality meets federal 1-hour Ozone standard (77 FR 64036). EPA revoked this standard, but some associated requirements still apply.

[3] Per Health and Safety Code (HSC) Section 40921.5(c), the classification is based on 1989 – 1991 data, and therefore does not change.

Source: CARB 2024, EPA 2024b.

MONITORING STATION DATA AND ATTAINMENT DESIGNATIONS

Criteria air pollutant concentrations are measured at two monitoring stations in the NEPAB: the Mount Shasta (ARB 47853) and Yreka (ARB 47861) stations. The Yreka monitoring station is the closest and most representative station to the project area with recent data for ozone and $PM_{2.5}$. Table 3.2-3 summarizes the air quality data from the last 3 years (2022-2024). PM_{10} concentrations are not monitored at the Mount Shasta and Yreka stations. Because no PM_{10} concentrations are collected at any monitoring stations within the NEPAB, PM_{10} was not reported here.

Both CARB and EPA use this type of monitoring data to designate areas according to their attainment status for criteria air pollutants (attainment designations are summarized above in Table 3.2-3).

Table 3.2-3 Summary of Annual Data on Ambient Air Quality (2022-2024)

	2022	2023	2024
Ozone			
Maximum concentration (1-hr/8-hr avg, ppm)	0.048/0.070	0.070/0.047	0.075/0.067
Number of days state standard exceeded (1-hr/8-hr)	0/0	0/0	0/0
Number of days national standard exceeded (8-hr)	0	0	0
Fine Particulate Matter ($PM_{2.5}$)			
Maximum concentration (24-hour µg/m^3)	302.6	235.1	32.4
Number of days national standard exceeded (24-hour measured)	7	17	0

Notes: µg/m^3 = micrograms per cubic meter; ppm = parts per million.

Source: CARB 2024.

TOXIC AIR CONTAMINANTS

According to the *California Almanac of Emissions and Air Quality* (CARB 2013a), the majority of the estimated health risks from TACs can be attributed to relatively few compounds, the most important being diesel PM. Diesel PM differs from other TACs in that it is not a single substance, but rather a complex mixture of hundreds of substances. Although diesel PM is emitted by diesel-fueled internal combustion engines, the composition of the emissions varies depending on engine type, operating conditions, fuel composition, lubricating oil, and whether an emissions control system is being used. Unlike the other TACs, no ambient monitoring data are available for diesel PM because no routine measurement method currently exists. However, CARB has made preliminary concentration estimates based on a PM exposure method. This method uses the CARB emissions inventory's PM_{10} database, ambient PM_{10} monitoring data, and the results from several studies to estimate concentrations of diesel PM. In addition to diesel PM, the TACs for which data are available that pose the greatest existing ambient risk in California are benzene, 1,3-butadiene, acetaldehyde, carbon tetrachloride, hexavalent chromium, para-dichlorobenzene, formaldehyde, methylene chloride, and perchloroethylene.

Diesel PM poses the greatest health risk among these 10 TACs mentioned. Overall, levels of most TACs, except para-dichlorobenzene and formaldehyde, have decreased since 1990 (CARB 2013a).

ODORS

Odors are generally regarded as an annoyance rather than a health hazard. However, manifestations of a person's reaction to foul odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache).

The ability to detect odors varies considerably among the population and overall is quite subjective. Some individuals can smell very minute quantities of specific substances; others may not have the same sensitivity but may have sensitivities to odors of other substances. In addition, people may have different reactions to the same odor; an odor that is offensive to one person may be perfectly acceptable to another (e.g., a cooking-related odor from a fast food

restaurant). It is important to also note that an unfamiliar odor is more easily detected and is more likely to cause complaints than a familiar one. This is because of the phenomenon known as odor fatigue, in which a person can become desensitized to almost any odor and recognition only occurs with an alteration in the intensity. Odor sources of concern include wastewater treatment plants, sanitary landfills, composting facilities, recycling facilities, petroleum refineries, chemical manufacturing plants, painting operations, rendering plants, and food packaging plants (BAAQMD 2022). There are no sources of odors within the vicinity of the project site.

SENSITIVE RECEPTORS

Sensitive receptors are generally considered to include those land uses where exposure to pollutants could result in health-related risks to sensitive individuals, such as children or the elderly. Residential dwellings, schools, hospitals, playgrounds, and similar facilities are of primary concern because of the presence of individuals particularly sensitive to pollutants and/or the potential for increased and prolonged exposure of individuals to pollutants.

To the north, the project site is located adjacent to the Susan River with Riverside Drive, commercial businesses and the Lassen County Government center across the Susan River. To the east, the project site is bounded by SR 36 with primarily vacant land beyond. To the south, the former Southern Pacific Railroad right-of-way (ROW) is immediately adjacent to the project site; however, the tracks were removed in approximately 2006 and the ROW is now an unpaved portion of Skyline Road, with several residential properties off Sierra Road present further south. Beyond Sierra Road lies agricultural land. To the west, the remainder of the project parcel is present with vacant land adjacent, and a lumber yard associated with a prefabricated construction company beyond. The nearest sensitive receptors to the project site are the single-family homes along Sierra Road, approximately 450 feet south of the project site.

3.2.3 Environmental Impacts and Mitigation Measures

METHODOLOGY

Regional and local criteria air pollutant emissions and associated impacts, as well as impacts from TACs, CO concentrations, and odors were assessed using industry standard and accepted software tools, techniques, and emission factors. The project's construction and operational emissions are compared to relevant thresholds from LCAPCD, as described below.

Emissions of criteria air pollutants and precursors from the construction and operation of the project were calculated using the California Emissions Estimator Model (CalEEMod) Version 2022.1 computer program.

Construction is anticipated to start in July 2026 and last 12 months. Project construction was modeled in CalEEMod using a combination of model defaults and project-specific information. The project would require construction activities, including demolition (to remove existing underground utilities along with pavement and concrete), site preparation, site grading, building construction, underground water main trenching, utility work, pipe work paving, and architectural coatings. Model defaults were used for construction fleet, hours of use per day for each piece of equipment, worker and vendor trip numbers, and worker, haul (demolition truck), and vendor (delivery) trip length. It was assumed all cut and fill materials would be balanced on-site during grading and excavation, and 500 cubic yards of pavement and concrete would be removed during demolition. Construction accounts for the offsite improvements, including highway and street improvements and transitions, drainage facility connections, utility connections, and landscaping.

Operational emissions of criteria air pollutants and precursors were estimated using project-specific information, where available, default values in CalEEMod based on the project's location and land use, and mobile source emission rates from CARB's EMFAC model. Mobile-source emissions were modeled outside of CalEEMod using trip generation and trip length data from the transportation analysis, as summarized in Table 3.2-4. Indirect emissions associated with the use of consumer products and landscape maintenance activities were estimated using the applicable modules of CalEEMod using default consumption values.

Table 3.2-4 Summary of Transportation Data

Trip Type	Pass-By Trips		New Trips	
	Daily Trips	Trip Length	Daily Trips	Trip Length
Trucks - Travel Stop	1,073	0.24	120	2.4
Passenger Vehicles - Travel Stop	1,954	0.14	344	2.2
Passenger Vehicles - Fast Food	288	0.14	433	2.2
RVs	20	0.14	20	75

Notes: Pass-By Trip and New Trip estimates and trip lengths are based on information presented Section, 3.9, "Transportation," and Appendix I.

Source: Appendix I.

ROG emissions associated with the transfer, storage, and vehicle refueling were estimated based on CARB methods (CARB 2013b) and anticipated fuel throughput.

Operational emissions from all sources were estimated for full buildout of the project which would become fully operational in 2027. Detailed model assumptions and inputs for these calculations can be found in Appendix C.

The level of health risk from exposure to construction- and operation-related TAC was assessed quantitively and CO emissions was assessed qualitatively. This assessment was based on the proximity of TAC-generating activity to off-site sensitive receptors, the number and types of diesel-powered construction equipment being used, the duration of potential TAC exposure, and set back distances recommended by CARB (CARB 2005:4), and the minor trip generation associated with project operation.

Impacts related to odors were also assessed qualitatively, based on proposed construction activities, equipment types and duration of use, overall construction schedule, and distance to nearby sensitive receptors. To evaluate an odor impact, CARB recommends the lead agency provide adequate distance between typical sources of odors (e.g., sewage treatment plants, landfills, livestock operations) sensitive land uses (e.g., residences, schools).

THRESHOLDS OF SIGNIFICANCE

Appendix G of the CEQA Guidelines, which is a sample Initial Study checklist, includes inquiries regarding the air quality impacts of proposed projects. Appendix G also states that "[w]here available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied on" in answering those inquiries. It is a common practice for lead agencies to use the inquiries found in Appendix G for purposes of fashioning significance thresholds. Here, the City, in its discretion, has done so, and has also relied on guidance from the LCAPCD. Thus, here the proposed project's impact to air quality would be considered significant if it would do any of the following:

- conflict with or obstruct implementation of the applicable air quality plan;
- result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard;
    - result in a net increase in short-term construction criteria air pollutants or precursor emissions to exceed the LCAPCD's Rule 6:4 emissions threshold of 150 lb/day for ROG, NO_x, PM_{10}, $PM_{2.5}$ or 550 lb/day for CO;
    - result in a net increase in long-term operational criteria air pollutants or precursor emissions to exceed the LCAPCD's Rule 6:4 emissions threshold of 150 lb/day for ROG, NO_x, PM_{10}, $PM_{2.5}$ or 550 lb/day for CO;
- expose sensitive receptors to substantial pollutant concentrations; or
- result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Neither the City nor LCAPCD have developed CEQA thresholds of significance for air quality. As stated above, the City has elected to use the sample questions in Appendix G along with guidance from LCAPCD to establish air quality thresholds for this project. Further, Table 3.2-2 above shows that the project region is not in non-attainment for any

federal or state ambient air quality standard. Because the region is not in non-attainment, the threshold established in Question III.B of Appendix G does not apply and additional thresholds are necessary to determine the significance of project emissions. While LCAPCD does not have CEQA specific thresholds of significance for air quality, Rule 6:4 does specify numerical threshold requirements for new or modified stationary sources triggering BACT requirements to ensure that the region does not violate any state or federal ambient air quality standard. If these incremental levels for stationary sources are exceeded, BACT must be implemented to reduce the net increase in emissions. Although these BACT levels do not generally apply to mobile sources or general land development projects, they do represent pollution levels that LCAPCD considers significant enough to trigger the need for emissions reductions (i.e., BACT) in stationary sources even though the region is not in non-attainment for any federal or state standard. Accordingly, the City elects to use the thresholds in Rule 6:4 for comparative purposes to evaluate whether increases in emissions from the Project would represent a cumulatively considerable contribution.

ISSUES NOT DISCUSSED FURTHER

Conflict with or obstruct implementation of the applicable air quality plan

The project site is located in the Northeast Plateau Air Basin (NEPAB), which is currently designated as in attainment for all pollutants for federal and state standards. Typically, projects that propose development consistent with the growth anticipated by the relevant general plan would be consistent with applicable air quality plans, which account for planned growth as shown in adopted general plans. In the event that a project proposes development which is less dense than anticipated within the general plan, the project would likewise be consistent with the applicable air quality plans. If a project proposes development that is greater than that anticipated in the general plan, the project would be in conflict with the applicable air quality plan. There are no applicable air quality plans in the region.

Currently the project site is adjacent to, and outside the city limits, but within the City's approved Sphere of Influence (Figure 2-7). As part of the package or regulatory approvals required for the proposed project, the project applicant is requesting that LAFCO approve the annexation of the site into the City of Susanville City Limits, which would take the site out of the current land use planning jurisdiction of Lassen County. The project proposes a General Plan Amendment from the existing Industrial Park General Plan designation to "General Commercial/Shopping Center" designation and to change the current County zoning of Limited Industrial District (M-L) to a City C-2 (General Commercial/Shopping Center District) designation. The City Manager has advised the project applicant that the proposed project would be consistent with these designations. As described in Chapter 2, "Project Description", a truck and travel stop is allowed in a C-2 Zoning District with the issuance of a Use Permit through the City of Susanville City Council, which acts as the City's Planning Commission, per Ordinance 25-1048. The proposed General Plan and zoning amendments would ensure the project is consistent with the City's land use designation and zoning district.

As discussed in Section 3.9, Transportation, the majority of project trips (90% of truck trips, 85% of auto trips to the travel stop: 40%, of fast food restaurant trips, and 50% of RV trips) are expected to be pass-by trips (e.g., a trip already on the adjacent roadway that enters a commercial center en route to a different primary destination). Overall, the project is expected to generate 4,252 daily trips: 3,335 of these are expected to be pass-by trips, while 917 of these are expected to be new trips. Trip lengths for these various trip types are summarized in Table 3.2-5. Overall, the average trip length is equal to less than one mile per trip (4,252 daily trips, 4,073 daily VMT). This change in trip generation and VMT) would not be substantial because the majority of trips (estimated as 78 percent) would divert from SR-36. RV trip length VMT (75 miles) was based on half of trips originating/destined for Reno (84 miles one-way) and the other half originating/destined for the south entry/exit of Lassen National Park (67 miles). The Highway Performance Monitoring System estimates urbanized Susanville to have a VMT of 41.21 (Caltrans 2023).

Thus, because the project is consistent with the land use designations, and the majority of the trips would be pass-by trips, the project would not conflict with the implementation of applicable air quality plans and would not facilitate further growth. Therefore, no impacts due to conflict with an applicable air quality plan are anticipated, and this topic will not be discussed further.

Exposure of Sensitive Receptors to Other Emissions (Including Odors)

The occurrence and severity of odor impacts depends on numerous factors, including: the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of the affected receptors. While offensive odors rarely cause any physical harm, they still can be very unpleasant, leading to considerable distress among the public and often generate citizen complaints to local governments and regulatory agencies. Projects with the potential to frequently expose a substantial number of people to objectionable odors would be deemed to have a significant impact. As explained in more detail in "Environmental Impacts and Mitigation Measures" below, the nearest off-site receptor is located 450 feet south of the project site.

Construction

Minor odors from the use of heavy-duty diesel equipment, and the laying of asphalt during project-related construction activities would be intermittent and temporary and would dissipate rapidly from the source with an increase in distance. Given the temporary nature of construction activities and the distance of the sensitive receptors from the project site, project construction is not anticipated to result in an odor-related impact during the construction phase of the project.

Long-Term Operation

While almost any source may emit objectionable odors, some land uses are more likely to produce odors because of their operation, including agriculture, chemical plants, composting operations, dairies, fiberglass molding manufacturing, landfills, refineries, rendering plants, rail yards, and wastewater treatment plants. Operation of the project would result in new commercial land uses that would result in odors from the operation of diesel-fueled delivery trucks and refueling by both passenger vehicles and trucks and potentially odors from the proposed two fast-food restaurants, although these are likely to be contained within the building. The diesel odor sources are no different from those that currently exist on SR 36, adjacent to the project site. Moreover, the project would be subject to LCAPCD Rule 4:17, "Reduction of Odorous Materials" regarding the control odorous matter. LCAPCD Rule 4:17 prohibits use any article, equipment or other contrivance for the reduction of animal matter, agricultural material, etc., unless all gases, vapors, and gas-entrained effluent which contain odorous material are:

a) Incinerated at temperatures of not less than 1200 degrees Fahrenheit for a period of not less than 0.3 seconds, or

b) Processed in such a manner determined by the Control Officer to be equally, or more, effective for the purpose of air pollution control than (a) above.

Additionally, the project would also need to adhere to Lassen County APCD Rule 4:02 regarding nuisance air contaminants or other materials which cause injury, detriment, nuisance or annoyance. Finally, as specified above, prevailing winds in the NEPAB are out of the west and southwest; thus any odors would mostly be blowing away from the project site and not towards nearby sensitive receptors. As odors would dissipate rapidly from the source with an increase in distance and because the nearest off-site receptor is located 450 feet south from the project site, project operation is not anticipated to result in an odor-related impact to the public. Therefore, no impacts due to exposure of sensitive receptors to other emissions are anticipated, and this topic will not be discussed further.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 3.2-1: Construction Emissions of Criteria Air Pollutants and Ozone Precursors

Construction-related activities would result in project-generated emissions of ROG, NOx, CO, PM_{10}, and $PM_{2.5}$ from construction activities such as site preparation (e.g., excavation, clearing), off-road equipment, material and equipment delivery trips, and worker commute trips, and other miscellaneous activities (e.g., building construction, asphalt paving, application of architectural coatings). However, construction activities would not result in mass emissions of ROG, NOx, CO, PM_{10}, and $PM_{2.5}$ that would exceed significance thresholds in LCAPCD Rule 6:4. Therefore, construction-generated emissions of criteria air pollutants and ozone precursors would not affect the nonattainment status of the LCAPCD. This impact would be **less than significant**.

Project construction-related activities would result in emissions of ROG, NOx, CO, PM_{10}, and $PM_{2.5}$ from site preparation (e.g., excavation, clearing), off-road equipment, material delivery, worker commute trips, and other miscellaneous activities (e.g., building construction, asphalt paving, application of architectural coatings). Fugitive dust emissions of PM_{10} and $PM_{2.5}$ are associated primarily with site preparation and vary as a function of soil silt content, soil moisture, wind speed, acreage of disturbance, and vehicle miles traveled on and off the site. Emissions of ozone precursors, ROG and NO_X, are associated primarily with construction equipment and on-road mobile exhaust. Paving and the application of architectural coatings result in off-gas emissions of ROG. PM_{10} and $PM_{2.5}$ are also contained in vehicle exhaust.

Typical construction activities would require forklifts, cranes, dozers, compressors, loaders, backhoes, excavators, dozers, scrapers, pavement compactors, welders, concrete pumps, concrete trucks, compressors, and other diesel-fueled equipment as necessary.

Table 3.2-5 summarizes the modeled maximum daily emissions from the construction activities during the build out period. As shown in 3.2-5, maximum daily emissions of all pollutants of concern would not exceed the respective daily thresholds during either construction year. Therefore, considering the discussion above, because LCAPCD numerical thresholds are used to define a cumulatively considerable net increase in criteria pollutants, construction emissions would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. This impact would be **less than significant**.

Table 3.2-5 Summary of Maximum Daily Emissions of Criteria Air Pollutants and Precursors Associated with Project Construction

Construction Activity	Emissions (pounds/day)				
	ROG	NO_X	CO	PM_{10}	$PM_{2.5}$
Maximum Daily Year 1	3	29	30	9	5
Maximum Daily Year 2	28	18	25	1	1
Threshold of Significance	150	150	550	150	150
Exceed Significance Threshold?	No	No	No	No	No

Notes: CO = carbon monoxide; NO_X = oxides of nitrogen; PM_{10} = respirable particulate matter; $PM_{2.5}$ = fine particulate matter; ROG = reactive organic gases.

See Appendix C for detailed input parameters and modeling results.

Source: Modeling performed by Ascent in 2024

Mitigation Measures

No mitigation is required for this impact.

Impact 3.2-2: Operational Emissions of Criteria Air Pollutants and Ozone Precursors

Implementation of the project would not result in long-term operational emissions of ROG, NOx, CO, PM_{10}, and $PM_{2.5}$ that exceed LCAPCD's Rule 6:4 mass emissions criteria. Therefore, operation-generated emissions would not conflict with air quality planning efforts and would not affect the attainment status of the NEPAB with respect to the CAAQS and NAAQS for these criteria pollutants. This impact would be **less than significant**.

Project operations would result in the generation of long-term operational emissions of ROG, NOx, CO, PM_{10}, and $PM_{2.5}$ generated by mobile and area-wide sources. Mobile-source emissions of criteria air pollutants and precursors would result from vehicle trips to and from the gas station and fast-food restaurants, truck trips associated with fueling and use of the service station, employee commute trips, and other associated vehicle trips for fuel deliveries and supplies (See Table 3.2-5). Area-wide sources would include the use of landscaping equipment or other small equipment, and the periodic application of architectural coatings. In addition, ROG emissions associated with the fuel storage and vehicle refueling losses were quantified, consistent with CARB's methodology and emission factors.

Annual fuel throughput was assumed to be equal to 2,800,000 gallons of gasoline and 2,500,000 gallons of diesel (as discussed in Chapter 2, "Project Description").

Table 3.2-6 summarizes the daily operational-related emissions of criteria air pollutants and ozone precursors at full buildout.

Table 3.2-6 Summary of Maximum Daily Emissions of Criteria Air Pollutants and Precursors Associated with Project Operations

Operational Element	Emissions (pounds/day)				
	ROG	NO_X	CO	PM_{10}	$PM_{2.5}$
Area	1	<1	1	<1	<1
Energy	<1	<1	<1	<1	<1
Mobile	24	13	52	3	1
Fueling	21	—	—	—	—
Total	46	14	54	3	1
Threshold of Significance	150	150	550	150	150
Exceed Significance Threshold?	No	No	No	No	No

Notes: CO = carbon monoxide; NO_X = oxides of nitrogen; PM_{10} = respirable particulate matter; $PM_{2.5}$ = fine particulate matter; ROG = reactive organic gases; "—" = no value; totals may not equal the sum of the numbers because of independent rounding.

See Appendix C for detailed input parameters and modeling results.

Source: Modeling performed by Ascent in 2025

As shown in Table 3.2-5, the project's operational emissions would not exceed LCAPCD's Rule 6:4 mass emissions thresholds. Emissions would be minimal because project-related VMT would be low due to the fact that the majority of vehicle trips would be pass-by trips that would drive a short distance between the project site and SR-36. Moreover, other sources of emissions would be minor, as emissions from travel stops are dominated by motor vehicle travel and off-gassing associated with refueling activities. Therefore, because LCAPCD's Rule 6:4 numerical thresholds are used to define a cumulatively considerable net increase in criteria pollutants, the project's operational emissions would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 3.2-3: Expose Sensitive Receptors to Substantial Pollutant Concentrations

Construction-related emissions of TACs associated with proposed project would be spread over the project area, not affecting any one receptor for extended periods of time, and therefore, would not result in exposure of existing receptors to substantial TAC concentrations. The project would not result in exposure of sensitive receptors to excessive TAC emissions from operational emissions. This impact would be **less than significant**.

Exposure of sensitive receptors to TACs emitted during project construction and operation sources are discussed separately below. Construction and operation may expose nearby sensitive receptors to diesel PM during construction as well as diesel PM and other TACs during operations. Moreover, construction and operation may create congestion at nearby roadways, resulting in elevated levels of CO that may result in CO Hotspots. Each of these topics are discussed below.

Construction TACs

LCAPCD has not adopted thresholds of significance related to incremental increase in TAC emissions. However, most agencies in the state consider a project to be significant if it exposes sensitive receptors to a substantial incremental increase in TAC emissions greater than or equal to 10 in one million for carcinogenic risk (i.e., the risk of contracting cancer) and/or greater than or equal to 1.0 for a noncarcinogenic hazard index. Cancer risk is typically expressed as the chance of an individual developing cancer if a million people were exposed continuously for a specified duration (e.g., 30 years) to the toxic emissions being evaluated. Cancer risk estimates are expressed as a probability. For example, a 10-in-a-million risk estimate indicates that there are ten chances in a million (0.001%) a person may develop cancer from exposure to air toxics. Non-cancer health impacts due to long term exposures (called a chronic hazard index), and non-cancer health impacts due to short term exposures (called an acute hazard index) (CARB and CAPCOA 2015).

The project site is surrounded by primarily vacant land. The nearest sensitive receptor are rural, single-family residences located along Sierra Road, approximately 450 feet (137 meters) south of the nearest project site boundary.

Construction-related activities would result in temporary, intermittent emissions of diesel PM from the exhaust of off-road, heavy-duty diesel equipment used for demolition, site preparation (e.g. clearing, grading); paving; on-road truck travel; and other miscellaneous activities. On-road diesel-powered haul trucks traveling to and from the construction site to deliver materials and equipment are less of a concern because they would not stay on the site for long periods of time.

With regards to exposure of diesel PM, the dose to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the duration of exposure to the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher level of health risk for any exposed receptor. Thus, the risks estimated for an exposed individual are higher if a fixed exposure occurs over a longer period. Additionally, receptor exposure to pollution decreases with distance. For instance, CARB notes that exposure to freeway emissions and associated health risk drop substantially within the first 300 feet from the edge of the roadway and an 80 percent decrease at 1,000 feet from a distribution center (warehouse). As such, CARB typically recommends a 1,000 foot or less buffer between major pollution sources and sensitive land uses (CARB 2005). Considering that the studies referenced by CARB are based on dispersion properties associated with diesel PM emissions and the primary TAC of concern associated with construction of the project is also diesel PM, it is appropriate to consider the dispersion properties of diesel PM in these studies as a proxy for diesel PM from project construction. Residential receptors are generally of primary concern when discussing TAC exposure, as they would generally be exposed to project generated TACs for extended periods of time. As noted, most studies indicate a substantial drop in pollutant concentrations with distance. Provided that the nearest residences are located approximately 450 feet (137 meters) from the project site, TAC exposure from construction activities would not be considered substantial at these receptors. Thus, given the temporary and intermittent nature of construction activities within the project area, the low level of emission, and the short duration of construction, the dose of diesel PM of any one receptor would be limited and therefore would not result in a 10 in one million carcinogenic risk or 1.0 noncarcinogenic hazard.

Operation TACs

LCAPCD considers a project to be significant if it exposes sensitive receptors to a substantial incremental increase in TAC emissions greater than or equal to 10 in one million for carcinogenic risk (i.e., the risk of contracting cancer) and/or greater than or equal to 1.0 for a noncarcinogenic hazard index. The proposed project is a full-service travel center and RV park that would provide roadside services for trucks and motorists. Operation of the project would result in new sources of emissions from commercial and fuel delivery trucks, trucks and vehicles accessing and idling the travel center, and from vehicles refueling.

The majority of the mobile source emissions shown in Table 3.2-5 would occur away from the project site, as commercial, fuel delivery, trucks, and vehicles travel to and from the project site. TAC emissions from vehicle idling, queuing, and traveling within the travel center would be minimal and limited to the time it takes vehicles to arrive and depart the fueling stations and parking areas. There would be no permanent sources of diesel PM. As noted above,

there are no residential, school, or other sensitive uses in immediate vicinity of the project site, with the closest residence approximately 450 feet from the southernmost edge of the project site and approximately 800 feet (244 meters) feet from the fueling areas.

There are also TACs associated with vehicles refueling. Gas station emissions can be a large contributor to community air pollution and may lead to adverse health impacts for people living or working near gas stations. In terms of potential TAC sources, fuel dispensing facilities, specifically those with gasoline dispensing, are a known TAC emitter. TACs associated with gasoline dispensing include benzene, toluene, ethyl-benzene, xylenes, naphthalene, propylene, and n-Hexane. Per CARB, benzene is the TAC of primary concern (CARB 2022a, CARB 2022b, CARB 2022c) associated with gasoline dispensing facilities. CARB has developed Technical Guidance and modeling tools to evaluate the risk from exposure to gasoline dispensing facilities, focusing primarily on facilities within 1,000 meters of residential uses. With respect to the project, the closest sensitive uses are located approximately 450 feet (137 meters) from project site and 800 feet (224 meters) from the fueling areas (fuel pumps). Based on CARB's *Gasoline Service Station Industrywide Risk Assessment Look-up Tool* (CARB 2022), at this distance, the maximum residential cancer risk would be 0.38 chances in one million; which is well below the significance threshold of 10 chances in one million for excess cancer risk. Additionally, future temporary project users staying at the RV park or truck drivers staying overnight would be in close proximity to the refueling areas. However, exposure would be limited to their stay (i.e., a matter of days or weeks, as the applicant expects the majority of overnight RV stays to be for one night, rather than the 30-year exposure assumed in typical carcinogenic risk assessments). Further, the noncarcinogenic hazard index would be well below the noncarcinogenic hazard threshold of 1.0. Therefore, health risk from project operation is expected to be minimal.

CO Hotspots

Local mobile-source CO emissions near roadway intersections are a direct function of traffic volume, vehicle speed, and traffic delay. A CO hotspot is an area of localized CO pollution that is caused by severe vehicle congestion on major roadways, typically near intersections. LCAPCD has not adopted a numerical threshold for evaluating CO Hotspots or have screening criteria. Typically, a CO Hotspot occurs when project-related CO emissions (typically from motor vehicles at congested roadways and intersections) violate or contribute substantially to concentrations that exceed the 1-hour CAAQS of 20 parts per million (ppm), the 1-hour NAAQS of 35 ppm, or the 8-hour CAAQS or NAAQS of 9 ppm.

The NEPAB is in attainment for federal and state CO standards. Buildout of the project would not result in the increase in traffic volume required to generate a CO hotspot. This is because none of the intersections in the City of Susanville would experience traffic volumes in excess of the values derived from the attainment analysis undertaken by the South Coast Air Quality Management District (SCAQMD). The CO hotspot analysis conducted for the attainment by SCAQMD demonstrated no violation of CO standards at the busiest intersection in Los Angeles, which had a daily traffic volume of approximately 100,000 vehicles per day with level of service (LOS) E in the morning peak hour and LOS F in the evening peak hour (SCAQMD 2003). The traffic volumes at roadway segments and intersections in the project area would be much lower than 100,000 vehicles per day, as demonstrated in the project's Transportation Analysis (see Section 3.9, "Transportation", of this Draft EIR). Additionally, guidance from the Bay Area Air Quality Management District (BAAQMD), which is currently the only major air district with screening guidance for CO hotspots, states that a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour to generate a significant CO impact (BAAQMD 2017). In the project's opening year (2027), new daily trips in the project area are estimated to be 917 vehicles per day at the travel stop, with 66 trips during the AM peak hour and 63 trips during the PM peak hour (See Section, 3.9, "Transportation" and Appendix I).

Given that the Basin is in attainment for CO and is not projected to exceed CAAQS or NAAQS, it is not anticipated that the proposed project would result in localized CO impacts. Additionally, federal and State vehicle emissions standards are anticipated to result in a decrease in CO concentrations over time. For these reasons, local mobile-source CO emissions generated by future development that could be accommodated by the proposed project would not result in or substantially contribute to concentrations of CO that exceed the 1-hour (20 ppm and 35 ppm) or 8-hour (9 ppm) CAAQS and NAAQS.

Summary

Considering the relatively short duration in which diesel PM-emitting construction activity would occur, the distance to the nearest off-site sensitive receptors, and the highly dispersive properties of diesel PM, construction-related TAC emissions would not expose nearby sensitive receptors to incremental increases in cancer, chronic, and acute risk that exceed 10 in one million carcinogenic risk threshold or the 1.0 noncarcinogenic hazard index. The nearest existing receptors would be 450 feet south of the project site and thus, new sources of TAC emissions associated with commercial and fuel delivery trucks, and benzene emissions from vehicles refueling would not expose existing sensitive receptors to increased TAC emissions that would exceed the 10 in one million carcinogenic risk threshold or the 1 noncarcinogenic hazard index at operation. Furthermore, operational activities would not result in traffic congestion that could result in concentrations of CO that exceed the 1-hour (20 ppm and 35 ppm) or 8-hour (9 ppm) CAAQS and NAAQS. Therefore, the project's environmental impacts due to air quality emissions would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

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3.3 BIOLOGICAL RESOURCES

This section addresses common and sensitive biological resources that could be affected by implementation of the proposed project. This evaluation is based on the Biological Resources Technical Report completed by Ascent in September 2025 (Appendix D). In response to the Notice of Preparation, the California Department of Fish and Wildlife (CDFW) submitted a comment letter that identifies biological resources in the project area and recommendations to avoid, minimize, and mitigate significant and potentially significant direct and indirect impacts on biological resources (Appendix A). Section 3.2.2, "Environmental Setting," and Section 3.2.3, "Environmental Impacts and Mitigation Measures," below address these topics.

3.3.1 Regulatory Setting

FEDERAL

Federal Endangered Species Act

Pursuant to the federal Endangered Species Act (ESA) (16 USC Section 1531 et seq.), the US Fish and Wildlife Service (USFWS) regulates the taking of species listed in the ESA as threatened or endangered. In general, persons subject to ESA (including private parties) are prohibited from "taking" endangered or threatened fish and wildlife species on private property, and from "taking" endangered or threatened plants in areas under federal jurisdiction or in violation of State law. Under Section 9 of the ESA, the definition of "take" is to "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." USFWS has also interpreted the definition of "harm" to include significant habitat modification that could result in take.

Section 10 of the ESA applies if a non-federal agency is the lead agency for an action that results in take and no other federal agencies are involved in permitting the action. Section 7 of the ESA applies if a federal discretionary action is required (e.g., a federal agency must issue a permit), in which case the involved federal agency consults with USFWS.

Clean Water Act

Section 404

Section 404 of the Clean Water Act (CWA) prohibits the discharge of dredged or fill material into waters of the United States, including wetlands, except as permitted under separate regulations by the US Army Corps of Engineers (USACE) and US Environmental Protection Agency (EPA). Fill material is material placed in waters of the United States that has the effect of replacing any portion of waters of the United States with dry land or changing the bottom elevation of any portion of waters of the United States. To discharge dredged or fill material into waters of the United States, including wetlands, Section 404 requires projects to receive authorization from the Secretary of the Army, acting through USACE. According to the US Supreme Court, waters of the United States are "those relatively permanent, standing or continuously flowing bodies of water forming geographical features that are described in ordinary parlance as 'streams, oceans, rivers, and lakes.'" Wetlands adjacent to such waters come within the term where "the wetland has a continuous surface connection with that water, making it difficult to determine where the 'water' ends and the 'wetland' begins." (*Sackett v. Environmental Protection Agency*, 598 U.S. 651 (2023).)

Section 401

Under Section 401 of the CWA, an activity requiring a CWA Section 404 permit must obtain a State water quality certification to ensure state water quality standards are not violated. In California, the State Water Resources Control Board (SWRCB) delegates the authority to grant water quality certification to the nine regional water quality control boards (RWQCBs). The applicable RWQCBs for the proposed project is the Lahontan RWQCB. In accordance with Section 401 of the CWA, projects that apply for a USACE permit for discharge of dredged or fill material must obtain water quality certification from the appropriate RWQCB indicating that the action would uphold state water quality standards.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA), first enacted in 1918, provides for the protection of international migratory birds and authorizes the Secretary of the Interior to regulate the taking of migratory birds. The MBTA provides that it is unlawful, except as permitted by regulations, to pursue, take, or kill any migratory bird, or any part, nest, or egg of any such bird. Under the MBTA, "take" is defined as "to pursue, hunt, shoot, wound, kill, trap, capture, or collect, or any attempt to carry out these activities." A take does not include habitat destruction or alteration, if there is not a direct taking of birds, nests, eggs, or parts thereof. Title 50 of the Code of Federal Regulations (CFR), Section 10.13 (50 CFR 10.13) contains the current list of species protected by the MBTA. The list includes nearly all birds that are native to the United States.

Bald and Golden Eagle Protection Act

The Bald and Golden Eagle Protection Act, enacted in 1940 and amended multiple times since, prohibits the taking of bald and golden eagles without a permit from the Secretary of the Interior. Like the ESA, the Bald and Golden Eagle Protection Act defines "take" to include "pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb" (16 US Code 668–668c). "Disturb" means to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, injury to an eagle; a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior; or nest abandonment. In addition to immediate impacts, this definition also covers impacts that result from human-induced alterations initiated around a previously used nest site during a time when eagles are not present if, upon the eagle's return, such alterations agitate or bother an eagle to a degree that interferes with or interrupts normal breeding, feeding, or sheltering habits and causes injury, nest abandonment, or death.

STATE

California Endangered Species Act

The California Endangered Species Act (CESA) prohibits the take of any species that the California Fish and Game Commission has determined to be endangered or threatened, except as allowed by the California Native Plant Protection Act or the California Desert Native Plants Act. Fish and Game Code section 2081, however, authorizes the "incidental take" of such species under certain conditions and subject to certain mitigation requirements. Under the Fish and Game Code, which includes CESA, "take" is defined as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." The California Department of Fish and Wildlife (CDFW) understands this definition to include any activity that would directly or indirectly kill an individual of a species. Notably, the concept of "take" under CESA does not include "harm" or "harass," as the ESA definition does. As a result, the threshold for take is higher under CESA than under ESA.

California Fish and Game Code

Fully Protected Species

Sections 3511, 4700, 5050, and 5515 of the California Fish and Game Code prohibit take of fully protected birds, mammals, reptiles and amphibians, and fish. These statutes prohibit take or possession of fully protected species and generally do not provide for authorization of incidental take unless the species is covered and conserved in a natural community conservation plan, or the project activities qualify for permitting under Senate Bill 147. CDFW's fully protected status was California's first attempt to identify and protect animals that were rare or facing extinction. Most species listed as fully protected were eventually listed as threatened or endangered under CESA; however, some species remain listed as fully protected but do not have simultaneous listing under CESA.

Protection of Bird Nests and Raptors

Section 3503 of the Fish and Game Code states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird. Section 3503.5 of the California Fish and Game Code states that it is unlawful to take, possess, or destroy any raptors (i.e., species in the orders *Falconiformes* and *Strigiformes*), including their nests or eggs. Typical violations include destruction of active nests from tree removal or disturbance caused by project construction or other activities that cause the adults to abandon the nest, resulting in loss of eggs or young.

California Native Plant Protection Act

State listing of plant species began in 1977 with the passage of the California Native Plant Protection Act (NPPA), which directed CDFW to carry out the Legislature's intent to "preserve, protect, and enhance endangered plants in this state." The NPPA (California Fish and Game Code Section 1900 et seq.) allows the California Fish and Game Commission to designate plants as rare or endangered. CESA expanded on the original NPPA and enhanced legal protection for plants. CESA established threatened and endangered species categories and grandfathered all rare animals—but not rare plants—into the act as threatened species. Thus, three listing categories for plants are employed in California: rare, threatened, and endangered. Sixty-four species, subspecies, and varieties of plants are protected as rare under the NPPA. The NPPA prohibits take of endangered or rare native plants but includes exceptions for agricultural and nursery operations; for emergencies; and, after proper notification of CDFW, for vegetation removal from canals, roads, and other building sites, changes in land use, and other situations.

California Rare Plant Ranking System

CDFW works in collaboration with the California Native Plant Society (CNPS), a private organization, to maintain a list of plant species native to California that have low numbers, limited distribution, or are otherwise threatened with extinction. The California Rare Plant Rank (CRPR) system categorizes these species by rarity. This information is published in the Inventory of Rare and Endangered Vascular Plants of California (CNPS 2024). The CRPR system includes six rarity and endangerment ranks, which are summarized as follows:

- CRPR 1A: Plants presumed extirpated in California and either rare or extinct elsewhere.
- CRPR 1B: Plants Rare, Threatened, or Endangered in California and elsewhere.
- CRPR 2A: Plants presumed extirpated in California, but more common elsewhere.
- CRPR 2B: Plants Rare, Threatened, or Endangered in California, but more common elsewhere.
- CRPR 3: Plants about which more information is needed - A Review List.
- CRPR 4: Plants of limited distribution - A Watch List.

All plants with a CRPR are considered "special plants" by CDFW. The term "special plants" is a broad term used by CDFW to refer to all plant taxa inventoried in the California Natural Diversity Database (CNDDB), regardless of their legal or protection status. Plants ranked as CRPR 1A, 1B, 2A, and 2B may be considered under CEQA as endangered, rare, or threatened species within the definition of CEQA Guidelines Section 15380, subdivision (c). That provision gives agencies the discretion to treat species that are not officially listed under ESA or CESA as though they are endangered, rare, or threatened for CEQA purposes if the species can be shown to meet the criteria set forth in subdivision (b) for being rare or endangered. CDFW recommends that CRPR 1 and 2 species be addressed within the context of CEQA analyses and documentation. In general, CRPR 3 and 4 species do not meet the definition of endangered, rare, or threatened pursuant to CEQA Guidelines Section 15380; however, these species may be evaluated by the lead agency on a case-by-case basis to determine significance criteria under CEQA.

Lake and Streambed Alteration

All diversions, obstructions, or changes to the natural flow or bed, channel, or bank of any river, stream, or lake in California that supports fish or wildlife resources are subject to regulation by CDFW under Section 1602 of the California Fish and Game Code. Under Section 1602, it is unlawful for any person, governmental agency, or public utility to do any of the following without first notifying CDFW:

- substantially divert or obstruct the natural flow of, or
- substantially change or use any material from, the bed, channel, or bank of any river, stream, or lake; or
- deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake.

The regulatory definition of a "stream" is a body of water that flows at least periodically or intermittently through a bed or channel that has banks and supports fish or other aquatic life. This definition includes watercourses with a surface or subsurface flow that supports or has supported riparian vegetation (California Code of Regulations [CCR]

Title 14, Section 1.72). CDFW jurisdiction within altered or artificial waterways is based on the value of those waterways to fish and wildlife. A Lake and Streambed Alteration Agreement (LSAA) must be obtained for any diversion or alteration that would substantially adversely affect a fish or wildlife resource in a river, stream, or lake.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act requires that each of the nine RWQCBs in California prepare and periodically update basin plans for water quality control. Each basin plan sets forth water quality standards for surface water and groundwater, as well as actions to control nonpoint and point sources of pollution to achieve and maintain these standards. Basin plans offer an opportunity to protect wetlands through the establishment of water quality objectives. The RWQCB's jurisdiction includes waters of the United States, as well as areas that meet the definition of "waters of the State." "Waters of the State" is defined as any surface water or groundwater, including saline waters, within the boundaries of the State. The RWQCB has authority to take jurisdiction over areas not federally protected under CWA Section 404 provided they meet the definition of waters of the State and the SWRCB published a new set of procedures for discharges of dredged or fill material into waters of the State on March 22, 2019, revised April 6, 2021. (SWRCB 2021). The RWQCB typically requires mitigation resulting in no net loss of wetlands functions and values of waters of the State.

State Wetland Procedures

The State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State (State Procedures), as prepared by the SWRCB, went into effect on May 28, 2020. The Procedures consist of four major elements: 1) a wetland definition; 2) a framework for determining if a wetland feature is a water of the State; 3) wetland delineation procedures; and 4) procedures for the submittal, review, and approval of applications for water quality certifications and waste discharge requirements for dredge or fill activities. The State Procedures include a definition for wetland waters of the State that include (1) all wetland waters of the US; [1] and (2) aquatic resources that meet both the soils and hydrology criteria for wetland waters of the US but lack vegetation (i.e., less than 5 percent areal coverage at the peak of the growing season).

SWRCB has adopted the following definition of wetlands:

> *An area is wetland if, under normal circumstances, (1) the area has continuous or recurrent saturation of the upper substrate caused by groundwater or shallow surface water, or both; (2) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and (3) the area's vegetation is dominated by hydrophytes or the area lacks vegetation*.

LOCAL

Lassen County

Lassen County General Plan

Although the project site, if annexed to the City of Susanville as proposed, would not be subject to the Lassen County General Plan, the following goals and policies from the Natural Resources and Wildlife Elements of the Lassen County General Plan (Lassen County 1999), which relate to biological resources, are noted for informational purposes:

[1] Therefore, wetlands that meet the current definition, or any historic definition, of waters of the U.S. are waters of the state. In 2000, the State Water Board determined that all waters of the U.S. are also waters of the state by regulation, prior to any regulatory or judicial limitations on the federal definition of waters of the U.S. (California Code or Regulations title 23, section 3831(w).) This regulation has remained in effect despite subsequent changes to the federal definition. Therefore, waters of the state includes features that have been determined by the USEPA or the USACE to be "waters of the U.S." in an approved jurisdictional determination; "waters of the U.S." identified in an aquatic resource report verified by the USACE upon which a permitting decision was based; and features that are consistent with any current or historic final judicial interpretation of "waters of the U.S." or any current or historic federal regulation defining "waters of the U.S." under the Clean Water Act.

GOAL N-7: To maintain diverse and healthy vegetation communities in order to sustain natural and economic benefits, including watershed, soil stabilization, wildlife, fisheries, timberland, grazing and scenic values.

- NR25 POLICY: The County recognizes that there are vegetation communities that warrant special consideration and protection, and that these areas may be regarded as important or significant vegetation communities or areas of special biological importance. These areas include, but are not limited to, bitterbrush plant communities, wetlands and riparian areas.
- NR26 POLICY: In order to avoid or reduce the extent of potential adverse impact to important vegetation communities which may result from projects and land use decisions within its jurisdiction, the County shall consider the potential extent of such impacts in the course of project review.
- NR27 POLICY: Projects subject to County approval which will result in significant disturbance of a site's vegetative cover shall be required to prepare and implement an effective plan to revegetate disturbed, undeveloped areas of the site.

GOAL N-8: Protection of rare and endangered plant species balanced with the need to sustain productive, multiple land uses when possible.

- NR28 POLICY: The County recognizes the need to identify and provide reasonable measures for the protection of rare and endangered plant species in the consideration of projects and land use decisions.

GOAL N-9: Control invasive weeds and plant species.

- NR29 POLICY: The County supports strong measures to eliminate or prevent the spread of invasive and noxious weeds and plant species including, but not limited to, medusahead, yellow starthistle, and perennial pepperweed (whitetop), and to control the adverse effects from the excessive spreading of such species as juniper and cheatgrass.

GOAL N-10: Manage wildfire for the protection of life, property and natural resources.

- NR30 POLICY: The County supports programs for vegetation management to reduce the probability and potential severity of wildfires, provided that due consideration is given to related site-specific resource issues including protection of wildlife habitat and visual impacts in highway corridors.

GOAL W-1: To protect and enhance the overall health of wildlife habitats and special resource areas to maintain healthy, abundant and diverse wildlife populations.

- WE-1 POLICY: The County supports the management of wildlife resources in ways that enhance the health and abundance of wildlife populations and the diversity of species and their habitats and which, at the same time, balance management policies and program objectives with the range of social and economic needs for which the County is also responsible.
- WE-2 POLICY: The County supports the cooperative identification of "areas of significant wildlife value" or similar designations for areas where it is demonstrated by sound biological science that the habitat values are of significant importance to the health and/or survival of one or more species of wildlife. The County may apply a special designation to these areas, and/or agree to support specific resource management objectives, policies and voluntary programs to protect wildlife resources within these areas.
- WE-3 POLICY: To support and protect the value and viability of areas having significant wildlife habitat resources, including migration corridors, such areas should remain in relatively large parcel units. County zoning and subdivision regulations should protect these resources by not allowing isolated subdivisions intended primarily for residential use (except in limited circumstances pursuant to the County's zoning ordinance, e.g., segregation of homesites, in association with approved use permits, etc.) to be developed in areas which are not specifically designated in the General Plan or an area plan for a community development land use (e.g., rural residential) and zoned accordingly.
- WE-4 POLICY: The County recognizes that some areas which are designated and zoned for development, including but not limited to rural residential lands and areas indicated for planned development, may also have wildlife resource and open space values which need to be addressed and considered for protection. The County

will address the need for protection of wildlife resources and open space values in areas which are zoned for development during the review of development proposals.

- **WE-5 POLICY:** Prior to the imposition of substantial wildlife-related mitigation measures by the County, the County shall review evidence demonstrating that the proposed action or project could otherwise have potentially significant adverse impacts to wildlife and that the proposed measures will, in fact, help accomplish practical and necessary mitigation objectives.

Susanville Vicinity Area Plan and Environmental Impact Report

- **Policy 11.1A:** Lassen County shall conserve and enhance the wildlife and fisheries of the area and preserve and restore the ecological, recreational and aesthetic benefits of the Susan River and its tributaries.
  - **Implementation 11.11:** Review all proposed projects for possible adverse or beneficial impacts to fish and wildlife habitats.

Lassen County Code of Ordinances

The Lassen County Code of Ordinances does not contain any laws or ordinances related to biological resources that are relevant to the project.

City of Susanville

The following action policies from the Susanville General Plan 1990-2010 (City of Susanville 2006) and applicable Susanville Code of Ordinances, which relate to biological resources, are noted below.

Susanville General Plan 1990-2010

Action program [82]: Regulate land uses such as auto dismantling, waste disposal facilities, gas stations, and industries using toxic chemicals in areas where oil, gasoline, and toxic substances may enter a waterway in times of flood.

Action program [90]: Require off-site mitigations for environmental impacts that cannot be mitigated on-site

Susanville Code of Ordinances

Section 12.36.110 Tree permits the planting and protection of trees in new developments, and construction projects.

There shall be no less than one street tree from the approved species list planted at each new residential unit. In the event the development is commercial, the landscaping requirement conditions established by the planning commission and/or planning department shall require incorporation of a sufficient number of healthy trees, each at least one and one-fourth inches in diameter at six inches above the ground and at least eight feet in height with the crown in good balance with the trunk. The trees must be in a healthy condition at the time of final inspection. It shall further be the policy of the city that any commercial or residential development or subdivision shall be required to preserve and protect existing trees on the property, and those required to remain shall be clearly designated as a condition of development. Further, removal of any tree greater than four inches or greater in diameter at diameter breast height (d.b.h. is four and one-half feet above the ground) in the area of the new development shall require a permit under the procedures of Section 12.36.100 and include the following additional information:

A. Locations and dimensions of all setbacks and easements required by the zoning ordinance of the city.

B. Statements as to grade changes proposed for the lot or parcel if such grade changes will affect the trees within the lot or parcel, whether street trees, registered trees, or otherwise, and how such grade changes will affect the trees.

C. Any proposed street tree, or registered tree replacement program.

D. All trees to be retained shall be so identified by some method, such as painting, flagging, etc., prior to field inspection. Where protective barriers are necessary to prevent damage to a tree that is not to be removed, such barriers shall be erected before work starts.

E. In the event there are no trees located on the site to be developed which are required to be protected under the provisions of this article, the applicant shall so state in his application for a "no tree" verification. If such statement

is substantiated by an inspection of the site by the city, the applicant shall be relieved of the necessity to supply information and no fee shall be assessed.

F. Any and all such permits issued by the city shall be declared null and void if commencement of work so permitted is not started within a reasonable time, not to exceed six months. Permits not used within this period will require a new application. For purposes of this chapter, a permit shall be deemed used when the work authorized by the permit is completed.

Section 12.36.120 Permit procedure for tree removal.

The tree removal application shall be field checked and a field inspection report made prior to issuance of a permit. The city manager may request a recommendation concerning the application from any or all appropriate city departments or the tree commission.

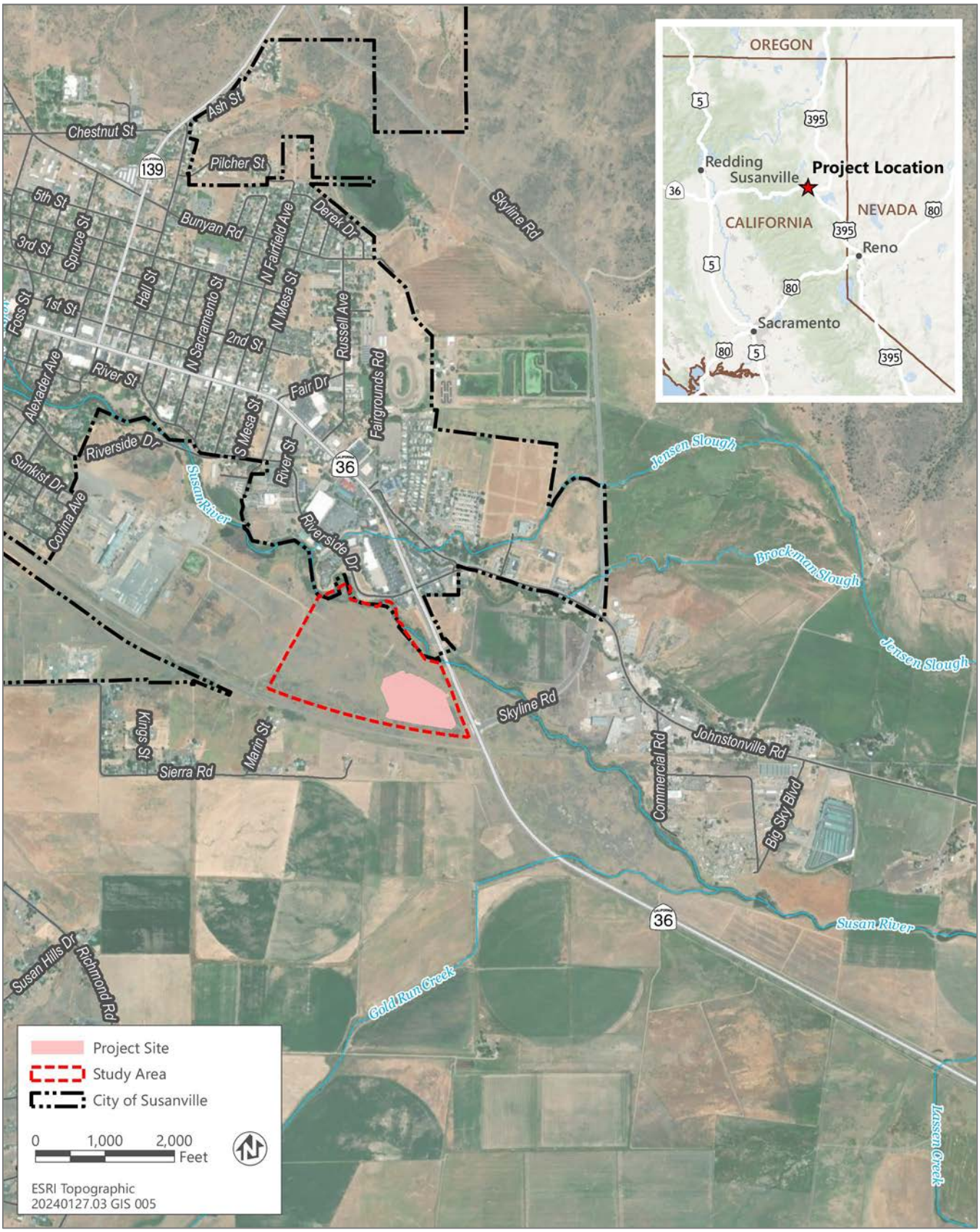
3.3.2 Environmental Setting

The study area for biological resources consists of the entire 79.6 acre parcel (Assessor's Parcel Number [APN] 107-280-017) that encompasses the 14.15-acre project site (Figure 3.3-1). The study area is within the Great Basin floristic province of California. It is characterized by low rainfall, hot to very hot summers, and cold winters. The upland portion of the study area is surrounded by barbed wire fencing indicating that the site was previously used for grazing. Much of the fencing is still standing but there are many sections where it has fallen to the ground, allowing for potential movement of wildlife. The Susan River runs along the northern boundary of the study area. Powerlines transect the study area. The study area is surrounded by urban development to the north, SR 36 to the east, a gravel road to the south that was previously a railway with residential and agriculture development south of the gravel road, and a vacant lot to the west with similar habitats and condition as the study area. The study area is 4,139 to 4,167 feet in elevation.

WILDLIFE HABITATS AND PLANT COMMUNITIES

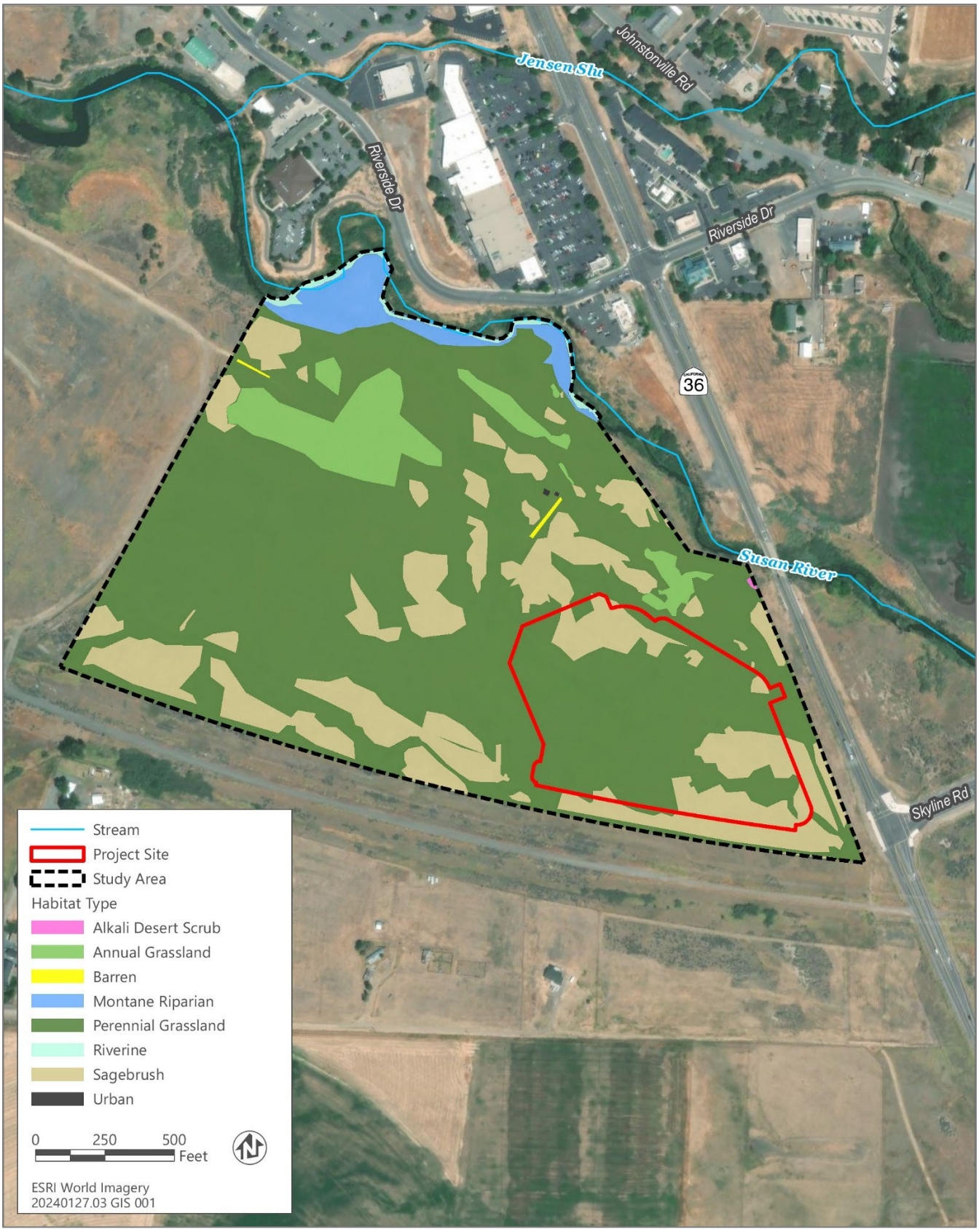
The habitat types described in this document were classified using CDFW's *A Guide to Wildlife Habitats of California*, a habitat classification scheme that was developed to support CDFW's California Wildlife Habitat Relationship (CWHR) system (Mayer and Laudenslayer 1988). The CWHR system is a wildlife information system and predictive model for California's regularly occurring wildlife species.

CWHR habitats within the study area consist of perennial grasslands, sagebrush, annual grassland, montane riparian, riverine, and alkali desert scrub habitats and developed areas of buildings and roads (Figure 3.3-2). Habitats within the 14.15-acre project site are limited to sagebrush and perennial grassland. Much of the perennial grassland area is dominated by ruderal nonnative species, primarily by perennial pepperweed (*Lepidium latifolium*). The CWHR system lacks a classification that captures this nonnative perennial herbaceous plant community.



Source: Adapted by Ascent in 2024.

Figure 3.3-1 Study Area for Biological Resources



Source: Adapted by Ascent in 2024.

Figure 3.3-2 CWHR Habitat Types

Table 3.3-1 summarizes the habitat types and associated vegetation alliances that occur within the study area, which are described in greater detail in the following sections.

Table 3.3-1 Habitat Types in the Study Area and Potentially Associated Vegetation Alliances

Land Cover/Habitat Type	Acreage within the Project Site	Acreage within the Study Area	Manual of California Vegetation Alliances
Perennial Grassland	10.08	54.34	Perennial pepper weed - Prickly lettuce patches[2], Ashy ryegrass - Creeping wildrye turfs[1], Salt grass flats
Sagebrush	3.59	17.34	Rubber rabbitbrush scrub
Fresh Emergent Wetland	0.48	4.37	None
Annual Grassland	--	4.88	Cheatgrass - medusahead grassland[2]
Montane Riparian	--	2.41	Sandbar willow thickets
Riverine	--	0.56	No equivalent
Barren	--	0.08	No equivalent
Alkali Desert Scrub	--	0.02	Greasewood scrub
Urban	--	0.01	No equivalent

[1] This is a designated sensitive natural community with a state rarity rank of S3 (vulnerable).

[2] These alliances are dominated by nonnative vegetation.

Source: Data compiled by Ascent in 2024 and CNPS 2024.

Perennial Grassland

The study area contains 54.34 acres of perennial grasslands, making it the dominant habitat type. A large proportion of the project site (10.08 acres) also consists of perennial grassland habitat. Although mapped as perennial grassland, much of the area is dominated by the invasive plant perennial pepperweed and other ruderal species. There is no CWHR classification type that describes these areas that are disturbed and dominated by nonnative perennial plant species. Perennial grassland is the closest classification match to this disturbed habitat type.

Perennial pepperweed is included in the California Code of Regulations (CCR) Section 4500 list of California State Noxious Weeds and has a California Invasive Plant Council (Cal-IPC) rating of high. The perennial pepperweed has formed dense, monotypic stands that have displaced all other plant species. Perennial pepperweed inhibits the germination and growth of other plant species that are sensitive to saline soils by extracting salt from deep in the soil and depositing that salt on the soil surface (DiTamaso et al. 2013). Although perennial pepperweed is a prolific seed producer, it primarily reproduces vegetatively from roots and root fragments, root fragments as small as one inch can produce new shoots, making it difficult to control.

There are small patches of perennial grasslands throughout the study area that are more typical of the perennial grassland habitat type, consisting of salt grass (*Distichlis spicata*), Sandberg bluegrass (*Poa secunda*), and beardless wildrye (*Elymus triticoides*). Salt grass is common among the sagebrush habitat but forms pure stands on the edges of the sagebrush-dominated areas. Cheatgrass (*Bromus tectorum*) and medusa head (*Elymus caput-medusae*) are abundant in the perennial grassland habitat.

Other common herbaceous species include tumble mustard (*Sisymbrium altissimum*), poison hemlock (*Conium maculatum*), bull thistle (*Cirsium vulgare*), and Canada thistle (*Cirsium arvense*), all of which are invasive species in California. Bull thistle, poison hemlock, and Canada thistle all have the Cal-IPC rating of moderate and are found on the edge of the perennial grassland habitat as it transitions to montane riparian habitat. Canada thistle is also in the southwest corner of the project site. Bull thistle and Canada thistle are included in the CCR Section 4500 list of California State Noxious Weeds. Although, tumble mustard, bull thistle, and Canada thistle are nonnative species, they are nectar sources for the Carson wandering skipper butterfly, a federally endangered species, that has the potential to occur in the study area.

Sagebrush

The study area contains 17.34 acres of sagebrush habitat, with 3.59 acres of the sagebrush habitat on the project site. Rubber rabbitbrush (*Ericameria nauseosa*) is the sole dominant species in the shrub layer of the sagebrush habitat, and salt grass is common in interspaces. This habitat type is highly disturbed and has many of the same nonnative upland species that occur in the perennial grassland habitat described above.

Fresh Emergent Wetland

Fresh emergent wetlands cover 4.37 acres in the study area, of which approximately 0.48 acres are on the project site. Vegetation in these wetlands is dominated by some combination of perennial pepperweed, common spikerush (*Eleocharis palustris*), salt grass (*Distchlis spicata*), Beardless wild-rye (*Elymus triticoides*), and Great Basin wild-rye (*Elymus cinereus*).

Annual Grassland

The study area contains 4.88 acres of annual grasslands. Cheatgrass is the dominant species of the annual grassland habitat. It appears that cheatgrass is invading drier portions of the study area that were once dominated by perennial pepperweed.

Montane Riparian

The study area contains 2.41 acres of montane riparian habitat on the northern boundary along the Susan River. Narrow-leaf willow (*Salix exigua*) is the dominant species in the montane riparian habitat, forming dense thickets. Poison hemlock is a common herbaceous species found among these willow thickets. There are a few Fremont cottonwoods (*Populus fremontii* ssp. *fremontii*) scattered within the montane riparian habitat along this section of the river. There is no riparian habitat in the 14.15-acre project site.

Riverine

The Susan River occupies 0.56 acres of the study area. The Susan River flows eastward from Silver and Caribou Lakes in the Sierra Nevada down to the Great Basin, discharging at Honey Lake. Precipitation in the western Sierra Nevada headwater portion of the watershed is mostly in the form of snow and influences the flow characteristics of the Susan River (Sutherland 2004). There is no riverine habitat in the 14.15-acre project site.

Barren

Barren areas from old roads that have exposed soils with less than 5 percent vegetation cover are also present in the study area. These barren areas occupy 0.08 acres of the study area.

Alkali Desert Scrub

There is a small, 0.02-acre stand of alkali desert scrub in the northeast corner of the study area, outside of the project site. This area is dominated by greasewood (*Sarcobatus vermiculatus*).

Urban

Two small buildings occupy 0.01 acres of the study area.

SOILS

According to the US Department of Agriculture (USDA) Web Soil Survey (USDA 2024), soils in the study area consist of 62.4 acres of Blickenstaff sandy loam, 13.4 acres of Modoc-Truax complex, 2.6 acres of Truckee Loam, 1.0 acre of Lakeview Loam, and 0.3 acres of Susanville-Smocreek complex. The dominant Blickenstaff sandy loam soils are moderately alkaline to very strongly alkaline. The project site consists entirely of Blickenstaff sandy loam.

CRITICAL HABITAT

"Critical habitat" is a legal term of art under ESA (16 USC Section 1532(5)). Critical habitats are areas considered essential for the conservation of a species listed under ESA as endangered or threatened. Critical habitats are specific geographic areas that contain features essential for conservation of listed species and may require special management and protection. Critical habitat may include an area not currently used by an endangered or threatened species, but that will be needed for species recovery. In general, under Section 7 of the ESA (16 U.S.C. Section 1536(a)(2)) federal agencies may not take actions that result in the destruction or adverse modification of critical habitat. A review of GIS-based habitat data for USFWS Critical Habitat for Threatened and Endangered Species (USFWS 2024a) shows that the study area is not located within designated critical habitat for any listed species.

RIPARIAN HABITAT AND OTHER SENSITIVE NATURAL COMMUNITIES

Sensitive natural communities are those native plant communities defined by CDFW as having limited distribution statewide or within a county or region and that are often vulnerable to environmental effects of projects (CDFW 2024a). These communities may or may not contain special-status plants or their habitat (CDFW 2024a). CDFW designates sensitive natural communities based on their state rarity and threat ranking using NatureServe's Heritage Methodology. Natural communities with rarity ranks of S1 to S3, where S1 is critically imperiled, S2 is imperiled, and S3 is vulnerable, are considered sensitive natural communities to be addressed in the environmental review processes of CEQA and its equivalents (CDFW 2024a). Sensitive natural communities are generally identified at the alliance level of vegetation classification hierarchy using the Manual of California Vegetation (Sawyer et al. 2009). Ashy ryegrass - Creeping wildrye turfs is a sensitive natural community identified in the study area and extending into the northwest corner of the project site. This vegetation alliance has a state rarity ranking of S3 and is therefore considered a sensitive natural community under CEQA.

Many riparian plant communities qualify as sensitive natural communities based on the plant associations therein. In addition, riparian habitats are protected under Section 1602 of California Fish and Game Code. There are 2.41 acres of riparian habitat in the study area but none within the 14.15-acre project site.

AQUATIC RESOURCES

On April 7 and 8, 2025, an aquatic resources delineation was conducted by Ascent wetland ecologists Tammie Beyerl and Shannon Hickey following the *Wetlands Delineation Manual* (Environmental Laboratory 1987) and *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Western Mountains, Valleys, and Coast Region* (Environmental Laboratory 2010), as well as the *State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State* (SWRCB 2021). The study area for the delineation consisted of the project site and potential off-site improvement areas as well as a buffer of 100 feet, totaling 90.74 acres. At the time of the survey, several sewer options were under consideration, thus the study area is considerably greater than the project site and the proposed utility routes for sewer, gas and water. Areas showing evidence of wetland or drainage signatures were investigated within the study area to determine the location and boundaries of wetlands and waters that may be subject to state or federal jurisdiction. During the aquatic resources delineation conducted during April 2025, a total of approximately 7.01 acres of aquatic resources that may be protected under state or federal regulations were documented in the delineation study area, including the Susan River, a distributary stream, and several wetlands (e.g., palustrine emergent wetlands, palustrine scrub-shrub wetlands, and palustrine open water wetlands). Two palustrine emergent wetlands encompassing a total of approximately 0.48 acres are on the project site and the remaining 6.53 acres are within the potential off-site improvement areas The complete methodology and results of the delineation are provided in the Aquatic Resources Delineation Report (Appendix E).

WILDLIFE CORRIDORS

Wildlife movement corridors are considered an important ecological resource by various agencies, including CDFW and USFWS, and under CEQA guidelines. Movement corridors may provide favorable locations for wildlife to travel

between different habitat areas such as foraging sites, breeding sites, cover areas, and preferred summer and winter range locations. They may also function as dispersal corridors allowing animals to move between various locations within their range. Topography and other natural factors, in combination with urbanization, can fragment or separate large open-space areas. Areas of human disturbance or urban development can fragment wildlife habitats and impede wildlife movement between areas of suitable habitat. This fragmentation creates isolated "islands" of habitat that may not provide sufficient area or resources to support long-term, sustainable populations and can adversely affect genetic and species diversity. Movement corridors can mitigate the effects of this fragmentation by allowing animals to move between remaining habitats and promoting genetic exchange between separate populations. The study area is mapped as an area of limited connectivity opportunities and is outside any essential connectivity area and the project site does not provide a connection between open space areas that would otherwise be isolated. The Susan River and its associated riparian and aquatic habitats provide a potential corridor for movement within and across the study area for some aquatic and terrestrial species. However, the actual functions and values of the Susan River corridor for wildlife movement depend on several local and regional variables, including specific habitat requirements of species potentially using the corridor and habitat quality within the corridor, corridor size and dimensions, the types and magnitude of edge effects (from adjacent land cover and uses), and presence of movement barriers. For example, in the study area, the Susan River corridor and uplands are influenced by SR 36, commercial and residential developments, and agriculture; these disturbance factors limit the overall quality and function of the Susan River corridor for wildlife movement. Additionally, project activities will avoid riparian and aquatic habitats of the Susan River.

SPECIAL-STATUS SPECIES

Special-status species are defined as species that are legally protected or that are otherwise considered sensitive by federal, State, or local resource agencies. Special-status species are species, subspecies, or varieties in one or more of the following categories, regardless of their legal or protection status:

- officially listed by the federal government under ESA as endangered or threatened;
- officially listed by the State of California under CESA as endangered, threatened, or rare;
- a candidate for State or federal listing;
- taxa (i.e., taxonomic category or group) that meet the criteria for listing, even if not currently included on any list, as described in CCR Section 15380 of the State CEQA Guidelines;
- species identified by CDFW as species of special concern;
- species listed as fully protected under the California Fish and Game Code;
- species afforded protection under local planning documents; and
- taxa considered by the CDFW to be "rare, threatened, or endangered in California" and assigned a CRPR of 1A, 1B, 2A or 2B.

The term "California species of special concern" is applied by CDFW to animals not listed under ESA or CESA, but that are declining at a rate that could result in listing, or that historically occurred in low numbers and known threats to their persistence currently exist. These species generally meet the definition of rare, endangered, or threatened pursuant to Section 15380 of the State CEQA Guidelines.

A preliminary list of special-status plant and animal species known or with potential to occur in the study area was developed based on a review of the following sources:

- CNDDB and CNPS Inventory of Rare and Endangered Plants records searches of the Diamond Mountain, Fredonyer Pass, Gallatin Peak, Janesville, Johnstonville, Pikes Point, Roop Mountain, Susanville, and Tunnison Mountain US Geological Survey (USGS) 7.5-minute quadrangles (CNDDB 2024; CNPS 2024).
- USFWS Information for Planning and Consultation (IPaC) list of species that may be affected by activities implemented at the project location (USFWS 2024b).

- USFWS National Wetlands Inventory mapping (USFWS 2024c).
- USDA Web Soil Survey (USDA 2024).
- Aerial photographs of the project site and vicinity.

In addition, Ascent conducted a reconnaissance-level survey for biological resources on June 27, 2024. During the survey, the biologists mapped habitat types in the study area as well as verified the suitability of habitats in the study area for special-status wildlife and plant species.

On June 16 and 17, 2025, Ascent botanist Karileigh Williams conducted a botanical survey for special-status plants. The survey was conducted in accordance with the protocols described in Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFW 2018). The survey area encompasses the entire project footprint and potential off-site improvement areas as well as a buffer of 100 feet.

Database queries, in conjunction with site surveys identified 24 special-status plant species and 32 special-status wildlife species with recorded occurrences in the project vicinity (Tables 3.3-2 and 3.3-3). Of the 56 species, 25 species were removed from further consideration based on a lack of suitable habitat in or adjacent to the project site, or because the project site is outside the known range of the species. A total of 11 special-status wildlife species were ultimately determined to have potential to occur on or adjacent to the project site in areas that may be directly or indirectly affected by project activities (Tables 3.3-2 and 3.3-3), notably western bumble bee (*Bombus occidentalis*), and northwestern pond turtle (*Actinemys marmorata*). However, two of these species, bank swallow and tricolored blackbird, were eliminated after species focused surveys. Bank swallow, a special-status bird species listed as threatened under CESA had been previously documented in the study area, but no signs of this species or tricolored blackbird were found during surveys conducted according to CDFW guidelines during the breeding season in 2025.

Nine special-status plant species were initially determined to have potential to occur on or adjacent to the project site in areas that may be directly or indirectly affected by project activities. These nine species have CRPR rankings of 1B and 2B; none are listed as threatened or endangered under ESA or CESA (Tables 3.3-2 and 3.3-3). A botanical survey for special-status plants was conducted in June 2025. During this survey, no special-status plant species were observed in the survey area. Although the June 2025 survey was conducted outside of the July to October bloom period for sticky pyrrocoma, vegetative growth would have been observed during the survey if it were present in the survey area, and no species in the genus Pyrrocoma were found during the survey. Therefore, although suitable habitat for nine special-status plant species is present in the study area, no occurrences were identified during focused surveys and these species are not expected to occur in the study area.

Table 3.3-2 Special-Status Plants Known to Occur in the Project Region and their Potential to Occur in the Study Area

Name	CRPR[1]	Habitat	Potential to Occur in the Study area
Grass alisma *Alisma gramineum*	2B.2	Wetland. Marshes and swamps. Freshwater marsh. 410–5,690 feet in elevation. Blooms June–August. Geophyte.	*Not expected to occur.* The study area lacks marsh and swamp wetland suitable for grass alisma.
Threetip sagebrush *Artemisia tripartita* ssp. *tripartita*	2B.3	Upper montane coniferous forest. Openings in the forest. Rocky, volcanic soils. 7,495–8,005 feet in elevation. Blooms August. Perennial.	*Not expected to occur.* The study area is below the known elevation range of three tip sagebrush.
Pulsifer's milk-vetch *Astragalus pulsiferae* var. *pulsiferae*	1B.2	Great Basin scrub, lower montane coniferous forest, pinyon and juniper woodland. Usually granitic substrate, sandy or rocky, often with pines or sagebrush. 3,755–6,100 feet in elevation. Blooms May–August (September). Perennial.	*Not expected occur.* The study area contains Great Basin (i.e., sagebrush) scrub that may be habitat for Pulsifer's milk-vetch; however, this species was not found during botanical surveys conducted within the blooming period in 2025.

Name	CRPR[1]	Habitat	Potential to Occur in the Study area
Upswept moonwort *Botrychium ascendens*	2B.3	Lower montane coniferous forest, meadows and seeps. Grassy fields, coniferous woods near springs and creeks. 3,660–10,710 feet in elevation. Blooms July–August. Geophyte.	*Not expected to occur.* The study area lacks meadow and seep habitats in lower montane coniferous forests suitable for upswept moonwort.
Scalloped moonwort *Botrychium crenulatum*	2B.2	Wetland. Bogs and fens, meadows and seeps, upper montane coniferous forest, lower montane coniferous forest, marshes and swamps. Moist meadows, freshwater marsh, and near creeks. 3,890–10,205 feet in elevation. Blooms June–September. Geophyte.	*Not expected to occur.* The study area lacks wetland habitats in montane coniferous forests suitable for scalloped moonwort.
Western goblin *Botrychium montanum*	2B.1	Old growth. Lower montane coniferous forest, upper montane coniferous forest, meadows and seeps. Creekbanks in old-growth forest. 4690–7970 feet in elevation. Blooms July–September. Geophyte.	*Not expected to occur.* The study area lacks old growth forest habitats suitable for this species.
Watershield *Brasenia schreberi*	2B.3	Wetland. Freshwater marshes and swamps. Aquatic from water bodies both natural and artificial in California. 100–7,220 feet in elevation. Blooms June–September. Geophyte.	*Not expected to occur.* The study area lacks wetland habitat suitable for this species.
Davy's sedge *Carex davyi*	1B.3	Subalpine coniferous forest, upper montane coniferous forest. 4,790–10,595 feet in elevation. Blooms May–August. Perennial.	*Not expected to occur.* The study area is below the elevation range of Davy's sedge, and it lacks suitable forest habitat.
Sheldon's sedge *Carex sheldonii*	2B.2	Wetland Lower montane coniferous forest, marshes and swamps, riparian scrub. Mesic sites; along creeks and in wet meadows. 3,935–6,610 feet in elevation. Blooms May–August. Geophyte.	*Not expected to occur.* The study area contains riparian habitat along the Susan River that may be suitable for this species; however, this species was not found during botanical surveys conducted within the blooming period in 2025.
Ochre-flowered buckwheat *Eriogonum ochrocephalum* var. *ochrocephalum*	2B.2	Great Basin scrub, pinyon and juniper woodland. Volcanics or clay. 3,935–7,905 feet in elevation. Blooms May–June. Perennial.	*Not expected to occur.* The study area contains Great Basin scrub habitat that may be suitable for Ochre-flowered buckwheat; however, this species was not found during botanical surveys conducted within the blooming period in 2025.
Aleppo avens *Geum aleppicum*	2B.2	Meadows in Great Basin scrub or lower montane coniferous forest. 1,475–4,920 feet in elevation. Blooms June–August. Perennial.	*Not expected to occur.* The study area lacks meadow habitat suitable for Aleppo avens.
Plumas ivesia *Ivesia sericoleuca*	1B.2	Wetland Great Basin scrub, lower montane coniferous forest, meadows and seeps, vernal pools. Vernally mesic areas; usually volcanic substrates. 4,315–7,005 feet in elevation. Blooms May–October. Perennial.	*Not expected to occur.* The study area contains Great Basin scrub with areas that are seasonally inundated that may be suitable habitat for Plumas Ivesia; however, this species was not found during botanical surveys conducted within the blooming period in 2025.
Dudley's rush *Juncus dudleyi*	2B.3	Wetland. Lower montane coniferous forest (mesic). Wet areas in forest. 1,495–6,560 feet in elevation. Blooms July–August. Perennial.	*Not expected to occur.* The study area lacks forest habitat suitable for this species.

Name	CRPR[1]	Habitat	Potential to Occur in the Study area
Santa Lucia dwarf rush *Juncus luciensis*	1B.2	Vernal pools, meadows and seeps, lower montane coniferous forest, chaparral, Great Basin scrub. Vernal pools, ephemeral drainages, wet meadow habitats and streamsides. 985–6,695 feet in elevation. Blooms April–July. Annual.	*Not expected to occur.* The study area contains Great Basin scrub with areas that are seasonally inundated that may be suitable habitat for Santa Lucia Dwarf rush; however, this species was not found during botanical surveys conducted within the blooming period in 2025.
Adobe lomatium *Lomatium roseanum*	1B.2	Lower montane coniferous forest, Great Basin scrub. Rocky, gravelly openings. 5,875–7,400 feet in elevation. Blooms May–July. Perennial.	*Not expected to occur.* The study area contains Great Basin scrub habitat but lacks gravelly openings suitable for *Adobe lomatium*.
Long bluebells *Mertensia longiflora*	2B.2	Great Basin scrub, lower montane coniferous forest. 4,345–6,005 feet in elevation. Blooms April–June. Perennial.	*Not expected to occur.* The study area contains Great Basin scrub habitat that may be suitable for long bluebells; however, this species was not found during botanical surveys conducted within the blooming period in 2025.
Janish's beardtongue *Penstemon janishiae*	2B.2	Great Basin scrub, lower montane coniferous forest, pinyon and juniper woodland. Volcanic soils; gravelly sites. 4,380–7,300 feet in elevation. Blooms May–July. Perennial.	*Not expected to occur.* The study area contains Great Basin scrub habitat but lacks gravelly openings suitable for Janish's beardtongue and the study area is slightly below the known elevation range of Janish's beardtongue.
Playa phacelia *Phacelia inundata*	1B.3	Great Basin scrub, lower montane coniferous forest, playas. Dried edges of alkali lakes and sinks, inundated clay soils. 4430–6560 feet in elevation. Blooms May–August (September). Annual.	*Not expected to occur.* The study area contains Great Basin scrub habitat with seasonally inundated depressions in alkali soils that may be suitable for playa phacelia; however, this species was not found during botanical surveys conducted within the blooming period in 2025.
Squarestem phlox *Phlox muscoides*	2B.3	Alpine boulder and rock field, subalpine coniferous forest, Great Basin scrub. Open rocky slopes. 4,200–8,860 feet in elevation. Blooms (May), June–August. Perennial.	*Not expected to occur.* The study area lacks rocky slopes suitable for squarestem phlox.
Sticky pyrrocoma *Pyrrocoma lucida*	1B.2	Lower montane coniferous forest, meadows and seeps, Great Basin scrub. Alkaline flats, clay soils. 2,495–6,855 feet in elevation. Blooms July–October. Perennial.	*Not expected to occur.* The study area contains Great Basin scrub habitat with alkali soils that may be suitable for sticky pryrrocoma; however, this species was not found during botanical surveys conducted in 2025.
Macoun's buttercup *Ranunculus macounii*	2B.2	Great Basin scrub, meadows and seeps, pinyon-juniper woodland. Mesic sites. 4,595–5,905 feet in elevation. Blooms June–July. Perennial.	*Not expected to occur.* The study area is below the known elevation range of Macoun's buttercup.
Alder buckthorn *Rhamnus alnifolia*	2B.2	Wetland. Meadows and seeps, lower montane coniferous forest, upper montane coniferous forest, riparian scrub. Mesic sites. 4,690–7,005 feet in elevation. Blooms May–July. Perennial.	*Not expected to occur.* The study area is below the known elevation range of alder buckthorn.

Name	CRPR[1]	Habitat	Potential to Occur in the Study area
Winged dock *Rumex venosus*	2B.3	Great Basin scrub. Sandy substrates; broadly distributed; just barely gets into California at Honey Lake Valley. 3,935–5,905 feet in elevation. Blooms May–June. Perennial.	*Not expected to occur.* The study area contains Great Basin scrub habitat that may be suitable for winged dock; however, this species was not found during botanical surveys conducted within the blooming period in 2025.
Northern slender pondweed *Stuckenia filiformis* ssp. *alpina*	2B.2	Wetland. Marshes and swamps. Shallow, clear water of lakes and drainage channels. 985–7,055 feet in elevation. Blooms May–July. Geophyte.	*Not expected to occur.* The study area lacks wetland habitat suitable for northern slender pondweed.

Notes: CRPR = California Rare Plant Rank; CNDDB = California Natural Diversity Database.

[1] Legal Status Definitions

California Rare Plant Ranks:

1B Plant species considered rare or endangered in California and elsewhere (protected under CEQA, but not legally protected under ESA or CESA)

2B Plant species considered rare or endangered in California but more common elsewhere (protected under CEQA, but not legally protected under ESA or CESA)

Threat Ranks:

0.1 Seriously threatened in California (over 80% of occurrences threatened; high degree and immediacy of threat)

0.2 Moderately threatened in California (20-80% occurrences threatened; moderate degree and immediacy of threat)

0.3 Not very threatened in California (less than 20% of occurrences threatened / low degree and immediacy of threat or no current threats known)

No federally or state listed plant species have potential to occur within the study area.

Sources: CNDDB 2024; CNPS 2024.

Table 3.3-3 Special-Status Wildlife Known to Occur in the Project Region and their Potential to Occur in the Study Area

Name	Federal Status1	State Status1	Habitat	Potential to Occur in the Study area
Invertebrates				
Western bumble bee *Bombus occidentalis*		SC	Once common throughout much of its range, in California, this species is currently largely restricted to high elevation sites in the Sierra Nevada and the northern California coast. Habitat includes open grassy areas, chaparral, scrub, and meadows. Requires suitable nesting sites for the colonies, availability of nectar and pollen from floral resources throughout the duration of the colony period (spring, summer, and fall), and suitable overwintering sites for the queens.	*May occur.* The study area contains floral resources and potentially suitable nesting sites to support Western bumble bee.
Monarch Butterfly *Danaus plexippus*	FC		Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby. Along migration routes and within summer ranges, monarch butterflies require two suites of plants: (1) host plants for monarch caterpillars, which are primarily milkweeds (*Asclepias* spp.) within the family Apocynaceae upon which adult monarchs lay eggs; and (2) nectar-producing flowering plants of many other species that provide food for adult butterflies. Having both host and nectar plants available from early spring to late fall and along migration corridors is critical to the survival of migrating pollinators.	*Not expected to occur.* The study area does not contain the host milkweed species to support monarch butterfly and does not provide overwintering roost sites.

Name	Federal Status1	State Status1	Habitat	Potential to Occur in the Study area
Carson Wandering Skipper *Pseudocopaeodes eunus obscurus*	FE		Great Basin grassland. Found in grasslands on alkaline substrates in eastern California (around Honey Lake) and western Nevada (Washoe County) below 5,000 feet. The larval host plant is salt grass. Needs open areas near springs or other fresh water.	*Not expected to occur.* The host plant species, salt grass, is present on the project site; however, the project site and surrounding study area lack sufficient nectar plants for this species. Additionally, the study area is infested with cheatgrass and perennial pepperweed, which generally make it unsuitable for this species.
Fish				
Eagle Lake rainbow trout *Oncorhynchus mykiss aquilarum*	—	SSC	Great Basin standing waters. Endemic to Eagle Lake, Lassen County, and its main tributaries, Pine and Papoose creeks.	*Not expected to occur.* The study area lacks standing water aquatic features to support Eagle Lake rainbow trout.
Eagle Lake tui chub *Siphateles bicolor* ssp. 12	—	SSC	Found only in Eagle Lake, Lassen County. Requires beds of aquatic vegetation in shallow, inshore areas for successful spawning.	*Not expected to occur.* The study area lacks aquatic features to support Eagle Lake tui chub.
Lahontan mountain sucker *Catostomus lahontan*	—	SSC	Occur in the Walker, Carson, Truckee and Susan river drainages of the Lahontan basin in the eastern Sierra Nevada, but not in the Eagle Lake basin. Also found in the North Fork Feather River drainage, mainly in Red Clover Creek. Found in shallow (less than 2 m), clear, low-gradient streams; associated with diverse substrates, from sand to boulders, in areas with dense cover. Have been found in streams at elevations up to 2,800m and at temperatures of 1-25 C.	*May occur.* The study area is adjacent to the Susan River, which may support Lahontan mountain sucker.
Amphibians				
Sierra Nevada yellow-legged frog *Rana sierrae*	FE	ST	Always encountered within a few feet of water. Tadpoles may require 2 to 4 years to complete their aquatic development.	*Not expected to occur.* The study area is outside the known range for Sierra Nevada yellow-legged frog (USFWS 2024d).
Southern long-toed salamander *Ambystoma macrodactylum sigillatum*	—	SSC	High elevation meadows and lakes in the Sierra Nevada, Cascade, and Klamath mountains with suitable woody debris and detritus to provide cover. Aquatic larvae occur in ponds and lakes. Outside of breeding season adults are terrestrial and associated with underground burrows of mammals and moist areas under logs and rocks.	*Not expected to occur.* The study area is outside the known range for southern long-toed salamander (Thomson et al. 2016).
Reptiles				
Northwestern pond turtle *Actinemys marmorata*	FP	SSC	Ponds, marshes, rivers, streams and irrigation ditches, usually with aquatic vegetation, below 6000 ft elevation. Needs basking sites and suitable (sandy banks or grassy open fields) upland habitat up to 0.5 km from water for egg-laying.	*May occur.* The study area contains Susan River and potentially suitable basking sites and upland habitat for egg-laying to support northwestern pond turtle.
Birds				
American peregrine falcon *Falco peregrinus anatum*	FD	SD	Near wetlands, lakes, rivers, or other water; on cliffs, banks, dunes, mounds; also, human-made structures. Nest consists of a scrape or a depression or ledge in an open site.	*Not expected to occur*. The study area contains suitable foraging habitat but lacks nests sites to support peregrine falcon.

Name	Federal Status1	State Status1	Habitat	Potential to Occur in the Study area
Bald eagle *Haliaeetus leucocephalus*	FD	SE, FP	Lower montane coniferous forest, old growth. Ocean shore, lake margins, and rivers for both nesting and wintering. Most nests are within 1 mile of water. Nests in large, old-growth, or dominant live tree with open branches, especially ponderosa pine. Roosts communally in winter.	*May occur.* The study area contains Susan River with cottonwood trees along its banks that may support bald eagle. There are many observations on eBird of bald eagles in Susanville and along the Susan River.
Bank swallow *Riparia riparia*	—	ST	Riparian scrub, riparian woodland. Colonial nester; nests primarily in riparian and other lowland habitats west of the desert. Requires vertical banks/cliffs with fine-textured/sandy soils near streams, rivers, lakes, ocean to dig nesting hole.	*Not expected to occur*. There is a mapped occurrence of bank swallow along the Susan River on the northwest corner of the study area (CNDDB 2024); however, this species was not observed during nesting bird surveys conducted during the 2025 nesting season.
Black tern *Chlidonias niger*	—	SSC	Freshwater marsh, Great Basin standing waters, and wetlands. Freshwater lakes, ponds, marshes and flooded ag fields. At coastal lagoons and estuaries during migration. Breeding range reduced. Breeds primarily in Modoc Plateau region, with some breeding in Sacramento and San Joaquin valleys	*Not expected to occur.* The study area lacks aquatic and wetland habitat suitable to support black tern.
California spotted owl *Strix occidentalis occidentalis*	FP	SSC	Broadleaved upland forest, lower montane coniferous forest, and upper montane coniferous forest. Mixed conifer forest, often with an understory of black oaks and other deciduous hardwoods. Canopy closure greater than 40 percent. Most often found in deep-shaded canyons, on north-facing slopes, and within 300 meters of water.	*Not expected to occur.* The study area lacks forest habitat to support California spotted owl.
Greater sage-grouse *Centrocercus urophasianus*	—	SC, SSC	Great Basin scrub. Found in the northeastern, Great Basin portion of state. Restricted to flat/rolling terrain vegetated by sagebrush, upon which it depends for both food and shelter.	*Not expected to occur.* The study area lacks sagebrush (*Artemisia tridentata*) to support greater sage-grouse. The shrub areas within the study area are dominated by rubber rabbitbrush.
Greater sandhill crane *Antigone canadensis tabida*	—	ST, FP	Marsh and swamp, meadow and seep, wetland. Nests in wetland habitats in northeastern California; winters in the Central Valley. Prefers grain fields within 4-miles of a shallow body of water used as a communal roost site; irrigated pasture used as loafing sites.	*Not expected to occur.* The study area lacks wetland habitat suitable for greater sandhill crane nesting.
Loggerhead shrike *Lanius ludovicianus*	—	SSC	Broadleaved upland forest, desert wash, Joshua tree woodland, Mojavean desert scrub, pinyon and juniper woodlands, riparian woodland, Sonoran desert scrub. Broken woodlands, savannah, pinyon-juniper, Joshua tree, and riparian woodlands, desert oases, scrub and washes. Prefers open country for hunting, with perches for scanning, and fairly dense shrubs and brush for nesting.	*May occur.* The study area contains riparian vegetation of dense willows that may support nesting of loggerhead shrike and open areas for hunting.
Northern harrier *Circus hudsonius*	—	SSC	Coastal salt and freshwater marsh. Nest and forage in grasslands, from salt grass in desert sink to mountain cienagas. Nests on ground in shrubby vegetation, usually at marsh edge; nest built of a large mound of sticks in wet areas.	*May occur.* The study area contains perennial grassland habitat that may support northern harrier.

Name	Federal Status1	State Status1	Habitat	Potential to Occur in the Study area
Swainson's hawk *Buteo swainsoni*	—	ST	Breeds in grasslands with scattered trees, juniper-sage flats, riparian areas, savannahs, and agricultural or ranch lands with groves or lines of trees. Requires adjacent suitable foraging areas such as grasslands, or alfalfa or grain fields supporting rodent populations.	*May occur.* Trees providing potential nest sites for Swainson's hawks are present along the Susan River and the study area provides habitat suitable for Swainson's hawk foraging. Many observations of Swainson's hawk have been recorded on eBird in Susanville and surrounding areas; however, no nesting Swainson's hawks were observed during the nesting bird surveys conducted during the 2025 nesting season, and the project site does not contain trees suitable for nesting Swainson's hawks.
Tricolored blackbird *Agelaius tricolor*	—	ST, SSC	Freshwater marsh, marsh and swamp, swamp, wetland. Highly colonial species, most numerous in Central Valley and vicinity. Largely endemic to California. Requires open water, protected nesting substrate, and foraging area with insect prey within a few kilometers of the colony.	*Not expected to occur.* Habitat suitable for tricolored blackbird nesting is present in the study area along the Susan River and the entire study area provides foraging habitat suitable for this species. Many observations of tricolored blackbirds have been recorded on eBird near the study area; however, this species was not observed in the study area during protocol level tricolored blackbird surveys conducted during the 2025 nesting season
White-faced ibis *Plegadis chihi*	—		Marsh and swamp, wetlands. Shallow fresh-water marsh. Dense tule thickets for nesting interspersed with areas of shallow water for foraging.	*Not expected to occur.* The study area lacks marsh or swamp wetland habitat to support white-faced ibis.
Yellow rail *Coturnicops noveboracensis*	—	SSC	Freshwater marsh, meadows and seeps. Summer resident in eastern Sierra Nevada in Mono County. Fresh-water marshlands.	*Not expected to occur.* The study area lacks freshwater marsh habitat to support yellow rail.
Yellow warbler *Setophaga petechia*	—	SSC	Riparian forest, riparian scrub, riparian woodland. Riparian plant associations in close proximity to water. Also nests in montane shrubbery in open conifer forests in Cascades and Sierra Nevada. Frequently found nesting and foraging in willow shrubs and thickets, and in other riparian plants including cottonwoods, sycamores, ash, and alders.	*May occur.* The study area contains riparian vegetation of dense willows that may support yellow warbler.
Yellow-headed blackbird *Xanthocephalus xanthocephalus*	—	SSC	Marsh and swamp, wetland. Nests in freshwater emergent wetlands with dense vegetation and deep water. Often along borders of lakes or ponds. Nests only where large insects such as Odonata are abundant, nesting timed with maximum emergence of aquatic insects.	*Not expected to occur.* The study area lacks marsh or swamp wetland habitat to support yellow headed blackbird.

Name	Federal Status1	State Status1	Habitat	Potential to Occur in the Study area
Mammals				
American badger *Taxidea taxus*	—	SSC	Alkali marsh, alkali playa, alpine, alpine dwarf scrub, bog a fen, brackish marsh, broadleaved upland forest, chaparral, chenopod scrub, cismontane woodland, closed-cone coniferous forest, coastal bluff scrub, coastal dunes, coastal prairie. Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils. Needs sufficient food, friable soils and open, uncultivated ground. Preys on burrowing rodents. Digs burrows.	*Not expected to occur*. The study area contains shrub and herbaceous habitats that may be suitable for American badger. There is a mapped occurrence of American badger adjacent to the study area (CNDDB 2024); however, clay soils present at the project site make burrowing and occupied dens on the project site unlikely.
Fisher *Pekania pennanti*	—	SSC	North coast coniferous forest, old growth, riparian forest. Intermediate to large-tree stages of coniferous forests and deciduous-riparian areas with high percent canopy closure. Uses cavities, snags, logs and rocky areas for cover and denning. Needs large areas of mature, dense forest. Endangered status applies to Southern Sierra DPS.	*Not expected to occur*. The study area lacks forest habitat to support fisher.
Gray wolf *Canis lupus*	FE	SE	Habitat generalists, historically occupying diverse habitats including tundra, forests, grasslands, and deserts. Primary habitat requirements are the presence of adequate ungulate prey, water, and low human contact.	*Not expected to occur*. The known California gray wolf packs and areas of known activity are outside the study area (CDFW 2024c). The study area is surrounded by development that makes it unsuitable habitat for gray wolf.
Pallid bat *Antrozous pallidus*	—	SSC	Deserts, grasslands, shrublands, woodlands and forests. Most common in open, dry habitats with rocky areas for roosting. Tree roosting has also been documented in large conifer snags, inside basal hollows of redwoods and giant sequoias, and bole cavities in oaks. Roosts must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.	*May occur*. The study area contains cottonwood trees near Susan River that could provide roosting sites for pallid bat.
Sierra Nevada mountain beaver *Aplodontia rufa californica*	—	SSC	Riparian forest, riparian scrub, riparian woodland. Dense growth of small deciduous trees and shrubs, wet soil, and abundance of forbs in the Sierra Nevada and east slope. Needs dense understory for food and cover. Burrows into soft soil. Needs abundant supply of water.	*Not expected to occur*. While the study area contains riparian habitat along Susan River, it is not characteristic of the habitats in which Sierra Nevada mountain beavers are typically found because it lacks sufficient cover of willows and alders, does not have wet soils throughout the year.
Sierra Nevada red fox - southern Cascades DPS *Vulpes vulpes necator* pop. 1	—	ST	Use multiple habitat types in the alpine and subalpine zones including high-elevation conifer dominated by whitebark pine and mountain hemlock, as well as meadows and fell-fields. May descend in winter to below subalpine zone consisting of red and white fir; as low as 1,400 meters (4,600 feet).	*Not expected to occur*. The study area lacks alpine, subalpine, and fir forest habitats to support Sierra Nevada red fox.

Name	Federal Status1	State Status1	Habitat	Potential to Occur in the Study area
Wolverine *Gulo gulo*	—	ST, FP	Alpine, alpine dwarf scrub, meadow and seep, montane dwarf scrub, north coast coniferous forest, riparian forest, subalpine coniferous forest, upper montane coniferous forest, wetland. Found in the north coast mountains and the Sierra Nevada. Found in a wide variety of high elevation habitats. Needs water source. Uses caves, logs, burrows for cover and den area. Hunts in more open areas. Can travel long distances.	*Not expected to occur.* The study area lacks habitat suitable for wolverine.

General references: Unless otherwise noted all habitat and distribution data provided by CNDDB.

Note: CNDDB = California Natural Diversity Database

[1] Legal Status Definitions

Federal:
FE Endangered (legally protected)
FT Threatened (legally protected)

State:
SE Endangered (legally protected)
ST Threatened (legally protected)
FP Fully protected (legally protected)
SSC Species of special concern (no formal protection other than CEQA consideration)

Source: CNDDB 2024; USFWS 2024c.

COMMON RAPTOR SPECIES

Common raptor species, such as red-tailed hawk (*Buteo jamaicensis*), do not meet the definition of rare, threatened, or endangered pursuant to CCR Section 15380 of the State CEQA Guidelines. However, nests of these species are protected under the MBTA and Section 3503.5 of the California Fish and Game Code. Section 3503.5 of the Code prohibits take, possession, or destruction of any birds in the orders Falconiformes (hawks) or Strigiformes (owls), or of their nests and eggs. Common raptor species in these orders may nest on or adjacent to the project site and could abandon their nests in response to project construction disturbances if mitigation measures are not implemented to avoid nest disturbance.

COMMON MIGRATORY BIRDS

Many common bird species are migratory and are afforded protection under the MBTA. Occupied nests of all migratory birds are protected under the MBTA, which makes it illegal to intentionally take these species or destroy their eggs. In addition, under Section 3503 of the California Fish and Game Code, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird. Section 3503.5 of the Code prohibits take, possession, or destruction of any birds in the orders Falconiformes (hawks) or Strigiformes (owls), or of their nests and eggs. Migratory non-game birds are protected under Section 3800, while other specified birds are protected under Section 3505. Common bird species protected under MBTA, or Fish and Game Code may nest in habitats on or adjacent to the project site and could abandon their nests in response to project construction disturbances if mitigation measures are not implemented to avoid nest disturbance.

3.3.3 Environmental Impacts and Mitigation Measures

METHODOLOGY

This impact evaluation is based on data collected during a reconnaissance-level survey conducted June 27, 2024; an aquatic resources delineation conducted on April 7 and 8, 2025; focused surveys for tricolored blackbirds, bank swallows, and Swainson's hawks at, and surrounding the project site, on April 21-22, May 11-12, and June 2-3, 2025; a botanical survey for special-status plants undertaken on June 16 and 17, 2025; a review of aerial photographs of the project site and vicinity; and literature reviews and database queries from the sources listed under the "Special-Status Species" section above.

THRESHOLDS OF SIGNIFICANCE

CEQA Guidelines section 15065 includes "mandatory findings of significance," some of which relate to biological resources. These mandatory findings of significance apply to, among other things, "the identification of effects to be analyzed in depth in the environmental impact report"; and "the requirement to make detailed findings on the feasibility of alternatives or mitigation measures to substantially lessen or avoid the significant effects on the environment[.]" (CEQA Guidelines Section 15065[c].)

In addition, Appendix G of the CEQA Guidelines, which is a sample Initial Study checklist, includes inquiries regarding biological resources. The "mandatory findings" described above are found in questions located near the end of Appendix G entitled, "Mandatory Findings of Significance." An earlier section of Appendix G, entitled, "Biological Resources," includes other questions relating to biological resource impacts. It is a common practice for lead agencies to use the inquiries found in Appendix G for purposes of fashioning significance thresholds. Such an approach is required with respect to the mandatory findings of significance found in section 15065. Here, the City is using the language of section 15065 and the other biological resource inquiries in Appendix G to fashion significance criteria. Based on these approaches, an impact on biological resources is considered significant if implementation of proposed project would do any of the following:

- 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;
- substantially reduce the number or restrict the range of an endangered, rare or threatened species;
- have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS;
- have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by CDFW or USFWS;
- have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
- interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;
- conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; and/or
- conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

ISSUES NOT DISCUSSED FURTHER

Substantially Reduce the Habitat of a Fish or Wildlife Species

The proposed project would not alter the Susan River or any associated riparian and wetland habitats, and fish and other aquatic species could still move through the area within the river channel as they do under existing conditions. The proposed project does not propose direct work within the Susan River, nor does the project include any features that would reduce potential fish habitat, due to the distance from the majority of project construction activities to the Susan River. The closest project infrastructure to the Susan River is associated with the offsite utilities (sewer, gas and water lines) that would be hung on bridges over the Susan River, and thus would not reduce fish habitat. The proposed project would not substantially reduce, isolate or fragment any habitat areas as the 14.15-acre project site is part of a larger 79.6-acre parcel, the remainder of which would not be developed, and wildlife could continue to use the remainder of the parcel (the remaining 82 percent). Therefore, the proposed project would not substantially reduce the habitat of a fish or wildlife species, and this topic is not discussed further.

Cause a Fish or Wildlife Population to Drop Below Self-Sustaining Levels

As noted above, the proposed project does not propose direct work within the Susan River, nor does the project include any features that would reduce potential fish habitat, due to the distance from the majority of project construction activities to the Susan River. Thus, the project would not cause a fish population to drop below self-sustaining levels. A total of 11 special-status wildlife species were ultimately determined to have potential to occur on or adjacent to the project site in areas that may be directly or indirectly affected by project activities. However, two of these species, bank swallow and tricolored blackbird, were eliminated after species focused surveys. The remaining nine species are western bumble bee, Lahontan mountain sucker, northwestern pond turtle, loggerhead shrike, bald eagle, northern harrier, Swainson's hawk, yellow warbler, and pallid bat. Seven of these species are capable of flight. During sensitive activity periods for these species, such as during nesting periods of birds and during the breeding and flight seasons of western bumble bee, activities that could cause adverse effects would be halted if these species are found thus the proposed project would not cause a wildlife population to drop below self-sustaining levels as the 14.15-acre project site is part of a larger 79.6-acre parcel, the remainder of which would not be developed, and wildlife could continue to use the remainder of the parcel (the remaining 82 percent) for reproduction. The remaining species (a fish and an amphibian) require access to aquatic areas such as the Susan River, which the project would avoid. While the northwestern pond turtle requires sandy banks or grassy open fields to lay eggs, as discussed, the remainder of the 79.6-acre parcel would be undeveloped and available for pond turtle. Therefore, the proposed project would not cause a fish or wildlife population to drop below self-sustaining levels, and this topic is not discussed further.

Threaten to eliminate a plant or animal community

Although suitable habitat for nine special-status plant species is present in the study area, no occurrences were identified during focused surveys and these species are not expected to occur in the study area, thus the proposed project would not threaten to eliminate a plant species. No project activities are proposed within the Susan River corridor; as a result, the project is not expected to threaten to eliminate a fish species. Project activities do not include removal of any trees, structures, or any other potential roosting sites for birds or bats; as a result, this project is not expected to threaten to eliminate a bird or bat species. While project activities could have an impact on Special-Status Wildlife Species that may occur on the project site, such as western bumble bee and western pond turtle, it is unlikely that project activities would extirpate these species from the vicinity, as the 14.15-acre project site is part of a larger 79.6-acre parcel, the remainder of which would not be developed, and wildlife could continue to use the remainder of the parcel (the remaining 82 percent).

While the project would not threaten to eliminate an animal community, Ashy ryegrass - Creeping wildrye turfs is a sensitive natural community that occurs within the study area. This vegetation alliance has a State rarity ranking of S3 (Vulnerable: moderate risk of extinction, restricted range, few populations) and is therefore considered a sensitive natural community under CEQA. Project activities (i.e., ground disturbance, vegetation removal, staging) could result in direct loss of this sensitive natural community. However, as previously determined, the 14.15-acre project site is part of a

larger 79.6-acre parcel, the remainder of which would not be developed, and the Ashy ryegrass - Creeping wildrye turfs sensitive natural community would continue to exist in the remainder of the study area and at other locations throughout the region. Thus, the community is not likely to be threatened with elimination. Therefore, the proposed project would not threaten to eliminate a plant or animal community, and this topic is not discussed further.

Substantially Reduce the Number or Restrict the Range of an Endangered, Rare or Threatened Species

Although suitable habitat for nine special-status plant species is present in the study area, no occurrences were identified during focused surveys and these species are not expected to occur in the study area, thus the proposed project would not substantially reduce the number or restrict the range of an endangered, rare or threatened plant species. No project activities are proposed within the Susan River corridor; as a result, the project is not expected to substantially reduce the number or restrict the range of an endangered, rare or threatened fish species. Project activities do not include removal of any trees, structures, or any other potential roosting sites for birds or bats; as a result, this project is not expected to substantially reduce the number or restrict the range of an endangered, rare or threatened bird or bat species. Therefore, the proposed project would not substantially reduce the number or restrict the range of an endangered, rare or threatened species and this topic is not discussed further.

Interfere with the Movement of Fish or Wildlife

The study area is mapped as an area of limited connectivity opportunities and is outside any essential connectivity area (CDFW 2024b). The Susan River and its associated riparian and aquatic habitats provide a potential corridor for movement within and across the study area for some aquatic and terrestrial species. However, the actual functions and values of the Susan River corridor for wildlife movement depend on several local and regional variables, including specific habitat requirements of species potentially using the corridor and habitat quality within the corridor, corridor size and dimensions, the types and magnitude of edge effects (from adjacent land cover and uses), and presence of movement barriers. For example, in the study area, the Susan River corridor and uplands are influenced by SR 36, commercial and residential developments, and agriculture; these disturbance factors limit the overall quality and functions of the Susan River corridor for wildlife movement. The proposed project would not alter Susan River or any associated riparian and wetland habitats, and fish and other aquatic species could still move through the area within the river channel as they do under existing conditions. The proposed project would not create barriers to wildlife movement through the area and would not isolate or fragment any habitat areas. Therefore, the proposed project would not interfere with wildlife movement or any established wildlife corridors and this topic is not discussed further.

Conflict with Local Policies or Ordinances Protecting Biological Resources

The project site is vacant and the proposed project would not require the removal of any trees. In accordance with Section 12.36.110 of the Susanville Code of Ordinances, the applicant would be required to provide a "no tree" verification as part of the project application, which would be substantiated by an inspection of the site by the City prior to issuing grading permits. The proposed project would comply with all local policies and ordinances protecting biological resources. This topic is not discussed further.

Conflict with a Habitat Conservation Plan or Natural Community Conservation Plan

According to CDFW (2023), there are no Habitat Conservation Plans or Natural Community Conservation Plans in Lassen County. Therefore, project implementation would have no impact related to conflicts with adopted Habitat Conservation Plans or Natural Community Conservation Plans. Therefore, this topic is not discussed further.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 3.3-1: Have a Substantial Adverse Effect on Special-Status Plant Species

Nine special-status plant species have potential to occur on or adjacent to the project site in areas that may be directly or indirectly affected by project activities. Project activities (i.e., vegetation clearing, ground disturbance, staging, heavy equipment use) could result in direct loss of special-status plants or indirect damage could occur through trampling, dusting, or damage to root systems of these species, if these species are present within the project site. However, although suitable habitat for nine special-status plant species is present in the study area, no occurrences were identified during focused surveys and these species are not expected to occur in the study area. This would be a **less than significant** impact.

As stated in Section 3.3.2, "Environmental Setting," nine special-status plant species were determined to have potential to occur on or adjacent to the project site in areas that may be directly or indirectly affected by project activities (Table 3.3-2) based on desktop review. Project activities (i.e., ground disturbance, vegetation removal, staging) could result in direct loss of special-status plants or indirect damage could occur through trampling, dusting, or damage to root systems of these species, if these species are present within the project site.

However, on June 16 and 17, 2025, Ascent botanist Karileigh Williams conducted a botanical survey for special-status plants. The survey was conducted in accordance with the protocols described in *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW 2018). The survey area encompassed the entire project footprint and potential off-site improvement areas as well as a buffer of 100 feet. As of June 2025, average precipitation in the area was 81 percent of normal for the water year (DWR 2025). The survey coincided with blooming periods for all potentially occurring special-status plant species, except for sticky pyrrocoma (*Pyrrocoma lucida*), which has a blooming period from July through October. However, this species can be identified by a combination of other distinguishing characteristics, such as the leaves and buds. During the special-status plant survey, the botanist walked meandering transects throughout the study area. All habitats present were surveyed thoroughly to properly inventory and document any potential occurrences of special-status plants. The surveys were floristic in nature, meaning that all vascular plant species encountered that were in identifiable condition were identified to the taxonomic level necessary to determine rarity status. Plants were keyed using *The Jepson Manual: Vascular Plants of California, Second Edition* (Baldwin 2012). A comprehensive plant species list is provided in Appendix B of the Biological Technical Report (Appendix D). Therefore, although suitable habitat for nine special-status plant species is present in the study area, no occurrences were identified during focused surveys and these species are not expected to occur in the study area. Impacts would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 3.3-2: Have a Substantial Adverse Effect on Special-Status Wildlife Species, Native Raptors, and Other Native Nesting Birds

Eleven special-status wildlife species were determined to have potential to occur on or adjacent to the project site in areas that may be directly or indirectly affected by project activities based on desktop review. Project activities (i.e., vegetation clearing, ground disturbance, staging, heavy equipment use) could result in direct loss of special-status wildlife species, loss of or disturbance to nests or dens, or disturbance leading to abandonment of active nests or dens and mortality of dependent young. This would be a **potentially significant** impact.

As stated in the Biological Technical Report, initially, 11 special-status wildlife species were determined to have potential to occur on or adjacent to the project site in areas that may be directly or indirectly affected by project activities: western bumble bee, Lahontan mountain sucker, northwestern pond turtle, bald eagle, loggerhead shrike, northern harrier, Swainson's hawk, tricolored blackbird, yellow warbler, bank swallow, and pallid bat (see Table 3.3-3). Bank swallow, a special-status bird species listed as threatened under CESA is also known nest on the near vertical

banks of the Susan River within the study area. In addition to special-status birds, native birds and raptors protected by California Fish and Game Code and the federal MBTA may also nest on or near the project site.

Although no project activities are planned in the Susan River corridor, noise, vibration, and visual stimuli created by project activities in the vicinity of bank swallow or tricolored blackbird nesting colonies could agitate parent birds, interrupting essential behaviors such as breeding, feeding, or brooding, resulting in loss of reproduction or nest failure, or could ultimately cause them to abandon their nests altogether resulting in death of chicks that have already hatched. Additionally, long-term operation of the travel stop could cause bank swallows and tricolored blackbirds to permanently abandon active nest sites near the project site, if any, which could ultimately lead to take. However, as identified in the 2025 Special-Status Bird Surveys Memo (contained within the Biological Technical Report, Appendix D), no bank swallows or tricolored blackbirds were observed within the project boundaries during the 2025 nesting bird surveys and these species are not expected to occur in the study area. As a result, the project is not expected to have impacts on these three species. Swainson's hawks may forage on the project site; however, the project site does not contain trees suitable for nesting Swainson's hawks, and no Swainson's hawk nests were observed in the 0.5-mile study area buffer during the 2025 nesting bird surveys.

In addition to special-status birds, native birds and raptors protected by California Fish and Game Code and the federal MBTA may also nest on or near the project site. Project activities (i.e., vegetation clearing, ground disturbance, staging, heavy equipment use) may result in direct loss of special-status wildlife species, loss of or disturbance to nests or dens, or disturbance leading to abandonment of active nests or dens and mortality of dependent young.

No project activities are proposed within the Susan River corridor; as a result, the project is not expected to have impacts on Lahontan mountain sucker. Project activities do not include removal of any trees, structures, or any other potential roosting sites for bats; as a result, this project is not expected to have any impacts on pallid bat.

Based on the above discussion, project activities have potential to have a substantial adverse effect on special-status wildlife species, native raptors, and other native nesting birds. This would be a **potentially significant** impact.

Mitigation Measures

Mitigation Measure 3.3-2a: Conduct Focused Surveys for Other Special-Status Birds, Nesting Raptors, and Other Native Nesting Birds and Implement Protective Buffers

- To minimize the potential for loss of special-status bird species, raptors, and other native birds, project activities (e.g., vegetation clearing, ground disturbance, staging) should be conducted during the nonbreeding season (approximately September 1-January 31, as determined by a qualified biologist). If project activities are conducted during the nonbreeding season, no further mitigation would be required.
- Within 14 days before the onset of any project activities to be implemented during the breeding season (approximately February 1 through August 31, as determined by a qualified biologist), a qualified biologist familiar with the birds of California and with experience conducting nesting bird surveys will conduct focused surveys for special-status birds, other nesting raptors, and other native bird nests. Surveys shall be conducted in accessible areas within 0.25 mile of the project site for bald eagles, golden eagles, and Swainson's hawks, within 500 feet of the project site for other raptor species and special-status birds, and within 50 feet of the project site for non-raptor common native bird nests.
- If no active nests are found, the qualified biologist shall submit a memo documenting the survey methods and results to the applicant and the City of Susanville, and no further mitigation would be required.
- If active nests are found, impacts on nesting birds shall be avoided by establishing appropriate buffers around active nest sites identified during focused surveys to prevent disturbance to the nest. Project activity shall not commence within the buffer areas until a qualified biologist has determined that the young have fledged, the nest is no longer active, or reducing the buffer would not likely result in nest abandonment. Buffers typically would be 0.25 mile for bald eagle and golden eagle, and 500 feet for other raptors and special-status birds (e.g., bank swallow). Buffer size for non-raptor common bird species would be determined by a qualified biologist. Factors to be considered for determining buffer size would include presence of natural buffers provided by

vegetation or topography, nest height above ground, baseline levels of noise and human activity, species sensitivity, and proposed project activities. Generally, buffer size for common bird nests would be at least 20 feet. The size of the buffer may be adjusted if a qualified biologist determines that such an adjustment would not be likely to adversely affect the nest. Any buffer reduction for individuals of a species listed as endangered or threatened under the Endangered Species Act or the California Endangered Species Act or that is a candidate for listing under the California Endangered Species Act would require consultation with CDFW and/or USFWS, depending on the species' legal status. Periodic monitoring of the nest by a qualified biologist during project activities would be required if the activity has potential to adversely affect the nest, the buffer has been reduced, or if birds within active nests are showing behavioral signs of agitation (e.g., standing up from a brooding position, flying off the nest) during project activities, as determined by the qualified biologist.

- Removal of bald eagle and golden eagle nests is prohibited regardless of the occupancy status under the federal Bald and Golden Eagle Protection Act. If bald eagle or golden eagle nests are found during focused surveys, then the nest would not be removed.

Mitigation Measure 3.3-2b: Conduct Focused Western Bumble Bee Survey and Establish Protective Buffers

- Within 14 days before commencement of project activities, a qualified wildlife biologist with familiarity with western bumble bee and experience using survey methods for the species shall conduct focused surveys of habitat suitable for the species within the project site.
- If no western bumble bee is found, the qualified biologist shall submit a memo documenting the survey methods and results to the applicant and the City of Susanville, and no further mitigation will be required.
- If western bumble bee is found, impacts to western bumble bee shall be avoided by establishing exclusion zones around occupied nests and floral resources within 100 meters of nests during the breeding/flight season of April-August.

Mitigation Measure 3.3-2c: Conduct Focused Western Pond Turtle Survey and Establish Protective Buffers

- Within 14 days before commencement of project activities, a qualified wildlife biologist familiar with western pond turtle shall conduct focused surveys for western pond turtle within upland nesting habitat areas suitable for the species.
- If western pond turtles are not found, the qualified biologist shall submit a memo summarizing the results of the survey to the applicant and the City of Susanville, and no further mitigation will be required.
- If a western pond turtle is found, flagging areas for avoidance, relocation of individual animals by a qualified wildlife biologist with a valid CDFW scientific collecting permit, and/or other measures recommended by a qualified biologist as necessary to avoid injury to or mortality of western pond turtles shall be required.
- If a western pond turtle nest is found, impacts to the nest would be avoided by establishing exclusion zones around all active nests, the size of which shall be determined by the qualified biologist. No project activities (e.g., vegetation removal, ground disturbance, staging, heavy equipment use) may occur within the exclusion zone until nesting activities are complete or the nest is abandoned, as confirmed by a qualified biologist. The qualified biologist shall monitor each nest once per week to track the status of the nest and to determine when it is no longer occupied. When it is no longer occupied, project activities within the exclusion zone may occur.

Significance after Mitigation

Mitigation Measures 3.3-2a through 3.3-2c identify procedures for avoiding impacts on special-status wildlife, native raptors, and other native nesting birds. Specifically, these measures require the applicant to retain a qualified biologist to conduct focused surveys for special-status wildlife species, raptors, and other native birds within a specified distance from the project site prior to project construction and establish appropriate buffers or exclusion zones around any nests, dens, or floral/nectar sources, as needed. If special-status wildlife species cannot be avoided, the applicant would be required to implement other mitigation strategies, subject to review and approval by the City of Susanville and in consultation with CDFW or USFWS, as needed or applicable for species entitled to protection

under the ESA or CESA. Implementation of Mitigation Measures 3.2-2a through 3.2-2c would reduce the potential for direct loss of or disturbance to special-status wildlife species, native raptors, and other native nesting birds to a **less than significant** level.

Impact 3.3-3: Have a Substantial Adverse Effect on Riparian Habitat or Other Sensitive Natural Communities

Riparian habitat protected under Section 1602 of California Fish and Game Code is present in the study area. Ashy ryegrass - Creeping wildrye turfs (*Leymus cinereus - Leymus triticoides*) is a sensitive natural community that occurs within the study area. Project activities (i.e., ground disturbance, vegetation removal, staging) could result in direct loss of this sensitive natural community. Installation of off-site utilities over or under the Susan River and distributary streams could result in loss or alteration of riparian habitat. This would be a **potentially significant** impact.

Montane riparian habitat is present in the study area along the Susan River, as depicted in Figure 3.3-2, and along a distributary stream at the crossing of Skyline Road. There is no riparian habitat within the project site. Wetlands are addressed below under Impact 3.3-4.

As identified in the Section 2.3.3, "Off-site Improvements," off-site utilities would cross the Susan River along SR 36 and Skyline Road. The current intention is for utilities to be hung on the bridge, with Lassen County and Caltrans permission. As no project construction is proposed within the Susan River corridor, a CWA Section 404 permit from USACE and a Section 401 Water Quality Certification from the Lahontan RWQCB would not be required for these activities. However, due to potential construction of off-site utilities on the banks of the Susan River and a distributary stream, there is the possibility for removal of riparian vegetation, modification of stream banks, or incidental deposition of materials into stream channels during construction, including during installation of bore locations if it is necessary to bore under the river. Fish and Game Code section 1602 requires any person, state or local governmental agency, or public utility to notify CDFW prior to beginning any activity that may do one or more of the following:

- substantially divert or obstruct the natural flow of the bed, channel, or bank of any river, stream, or lake; or
- substantially change or use any material from the bed, channel, or bank of any river, stream, or lake; or
- deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake.

As part of any potential LSAA, it is likely that CDFW would request the inclusion of an inadvertent release contingency plan which would outline the steps to be taken in the event of an accidental spill or release of hazardous materials, like oil or chemicals, into the environment, with the primary focus on avoiding environmental damage and protecting wildlife. Therefore, should construction occur on the banks of the Susan River or the distributary stream, adherence to the Fish and Game Code regulatory requirement for an LSAA, which includes notification to CDFW through the Environmental Permit Information Management System, provision of supplemental information such as plans, diagrams, maps, photos, studies and payment of LSAA notification fees, inclusion of an inadvertent release contingency plan and subsequent approval by CDFW prior to construction would ensure that implementation of the proposed project would be undertaken in a manner that is protective of the environment. Therefore, the project would not have a substantial adverse effect on riparian habitats.

The project site is disturbed and infested with invasive plant species such as perennial pepperweed (*Lepidium latifolium*) and cheatgrass (*Bromus tectorum*) as well as Medusa head (*Elymus caput-medusae*) to a lesser extent. However, Ashy ryegrass - Creeping wildrye turfs (*Leymus cinereus - Leymus triticoides*) is a sensitive natural community identified in the study area within the mapped CWHR perennial grassland habitat. This vegetation alliance has a State rarity ranking of S3 (Vulnerable: moderate risk of extinction, restricted range, few populations) and is therefore considered a sensitive natural community under CEQA. Project activities (i.e., ground disturbance, vegetation removal, staging) could result in direct loss of this sensitive natural community. This would be a **potentially significant** impact.

Mitigation Measures

Mitigation Measure 3.3-3: Delineate Sensitive Natural Communities, Implement Avoidance Buffers, and If Needed, Compensate for Unavoidable Losses

- Prior to implementation of project activities on the banks of the Susan River or the distributary stream, a qualified biologist shall demarcate the extent of riparian habitat present on the banks and establish a no-disturbance buffer outside the dripline of the riparian vegetation using flagging or high-visibility construction fencing. No vegetation removal or ground disturbing activities will occur within this buffer.
- If riparian habitat cannot be avoided (e.g., if riparian vegetation must be removed or trimmed) or if drilling for jack and bore is required within the riparian corridor, the riparian habitat will be restored to pre-project conditions following completion of construction activities that affect riparian habitat. If riparian vegetation must be removed during off-site utility construction and cannot be restored at the same location, the applicant will restore degraded riparian habitat at another location within the study area (the 79.6-acre parcel) at a 2 to 1 ratio (2 acres restored for every acre lost as a result of project activities).
- Before commencing any activity, including directional drilling, that may divert the natural flow or otherwise alter the Susan River or other stream resources, including riparian habitat on, or with roots reaching to, the bank of the Susan River, the applicant shall notify CDFW through issuance of a Lake and Streambed Alteration Notification (notification). If CDFW determines, based on the notification, that project activities trigger the need for a Lake and Streambed Alteration Agreement, the proponent shall obtain an agreement from CDFW before the activity commences. The applicant shall conduct project construction activities in accordance with the agreement, including implementing reasonable measures in the agreement necessary to protect fish and wildlife resources, when working within the bed or bank of waterways or in riparian habitats associated with those waterways. These measures may include demarcation of the construction area, biological monitoring, preparation of an inadvertent release (frac-out) contingency plan for directional drilling, erosion control, environmental awareness training for construction crews, and compensatory measures (e.g., restoration, long-term habitat management.
- Prior to implementation of project activities, a qualified biologist shall conduct protocol-level surveys to delineate sensitive natural communities within the project site following survey methods from CDFW's *Protocols for Surveying and Evaluating Impacts on Special-Status Native Plant Populations and Natural Communities* (CDFW 2018 or most recent version).
- If ashy ryegrass - creeping wildrye turfs sensitive natural community is not found on the project site, access routes, or staging areas, the biologist shall document the findings in a memo to the applicant and the City of Susanville, and no further mitigation will be required.
- If ashy ryegrass - creeping wildrye turfs sensitive natural community are found, the area occupied by this community shall be avoided completely, if avoidance can be achieved in light of project layout, design, engineering considerations, and utility alignments. This may include establishing a no-disturbance buffer around the vegetation community and demarcation of this buffer by a qualified biologist or botanist using flagging or high-visibility construction fencing. The size of the buffer shall be determined by the qualified biologist or botanist and shall be large enough to avoid direct or indirect impacts on the sensitive natural community.
- If ashy ryegrass - creeping wildrye turfs are found on the project site and cannot be avoided, the applicant shall compensate for unavoidable losses to the sensitive natural community by:
    - restoring degraded ashy ryegrass - creeping wildrye turfs within the study area (the 79.6 acre parcel) at a 1 to 1 ratio (1 acre restored for every acre lost as a result of project activities);
    - restoring degraded ashy ryegrass - creeping wildrye turf outside of the study area at a 1 to 1 ratio (1 acre restored for every acre lost as a result of project activities); or
    - preserving existing stands of ashy ryegrass - creeping wildrye turfs of equal or better value and equal acreage to those lost as a result of project activities through establishment of a conservation easement.

Significance after Mitigation

Mitigation Measure 3.3-3 identifies procedures for delineating sensitive natural communities within the project site. Mitigation Measure 3.3-3 further requires implementation of avoidance buffers for riparian habitat and other sensitive natural communities or compensation for unavoidable losses, such that substantial adverse effects on riparian habitat and ashy ryegrass - creeping wildrye turfs would not occur. With regard to the compensatory option of preserving existing stands of ashy ryegrass - creeping wildrye turfs of equal or better value and equal acreage to those lost as a result of project activities through establishment of a conservation easement, the resulting net loss of acreage would be less than significant under the threshold, as the project would ensure there would not be a substantial effect on the community. Additionally, as the community only exists extending into the northwest corner of the project site, it is likely that should compensation be the only option for the loss of the community in that area, the community on the whole would not face a substantial impact as it would continue its existence in the larger 79.6-acre parcel and outside the immediate construction areas. Therefore, implementation of Mitigation Measure 3.3-3 would reduce impacts on sensitive natural communities to a **less than significant** level.

Impact 3.3-4: Have a Substantial Adverse Effect on State or Federally Protected Wetlands

A total of approximately 7.01 acres of aquatic resources that may be protected under state or federal regulations were documented in the Aquatic Resources study area, including the Susan River, a distributary stream, and several wetlands (e.g., palustrine emergent wetlands, palustrine scrub-shrub wetlands, and palustrine open water wetlands). Project activities would result in substantial earth disturbance (trenching, grading and filling) but are in areas that are set back from the Susan River; therefore, sediment and debris are not expected to mobilize into the river. However, the proposed sewer line option would cross the Susan River by attaching pipe to the Main Street Bridge, or, if Caltrans deem it impermissible, by horizontal directional drilling under the river. Additionally, gas and water lines would be attached to the Skyline Road Bridge over the Susan River and another bridge over a distributary of the Susan River at Skyline Road. Off-site utilities, including improvements to SR 36 and extension of Skyline Road to the west of SR 36 to provide access to the project site, could result in fill of state or federally protected wetlands concentrated along the former railroad berm along the southern border of the project site and along the west side of SR 36. Section 404 of the CWA requires that a permit be obtained from USACE prior to the discharge of dredged or fill materials into any "waters of the United States," which includes wetlands and intermittent and perennial stream channels. This would be a **potentially significant** impact.

During the aquatic resources delineation conducted during April 2025, a total of approximately 7.01 acres of aquatic resources that may be protected under state or federal regulations were documented in the study area, including the Susan River, a distributary stream, and several wetlands (e.g., palustrine emergent wetlands, palustrine scrub-shrub wetlands, and palustrine open water wetlands). Of these, two palustrine emergent wetlands encompassing a total of approximately 0.48 acres are on the project site and the remaining 6.53 acres are within the potential off-site improvement areas. The complete methodology and results of the delineation are provided in the Aquatic Resources Delineation Report (Appendix E). The Susan River is a jurisdictional water of the United States and water of the state. Project activities would result in substantial earth disturbance (trenching, grading and filling) in areas that are set back from the Susan River; therefore, sediment and debris are not expected to mobilize into the river. However, the proposed sewer line option would cross the Susan River by attaching pipe to the Main Street Bridge, or, if Caltrans deem it impermissible, by horizontal directional drilling under the river. Additionally, gas and water lines would be attached to the Skyline Road Bridge over the Susan River and another bridge over a distributary of the Susan River at Skyline Road. Indirect impacts to the Susan River and the distributary stream could result from construction of these off-site utilities. In general, indirect impacts can include inadvertent release of sediment or chemicals, altered hydrology, and increased erosion and sedimentation through soil disturbance and vegetation removal. Implementation of an *Inadvertent Release (Frac-out) Contingency Plan for Horizontal Directional Drilling* and best management practices to safeguard watercourses from excessive deposition of sediment or debris would avoid indirect impacts on water quality in the Susan River and other waters.

Construction of the project would result in the direct loss of the 0.48 acres of state-protected palustrine emergent wetlands on the project site. Other off-site utilities, including improvements to SR 36, extension of Skyline Road to the

west of SR 36 to provide access to the project site, and potential gas and water lines could result in fill of state or federally protected wetlands concentrated along the former railroad berm along the southern border of the project site and along the west side of SR 36. Section 404 of the CWA requires that a permit be obtained from USACE prior to the discharge of dredged or fill materials into any "waters of the United States," which includes wetlands and intermittent and perennial stream channels. Section 404 permits generally require mitigation to offset losses of aquatic habitats which is intended to result in no net loss of wetland acres and functions. Waters of the state are defined as any surface or subsurface water and are protected by the Porter-Cologne Act. Fill of waters of the state, including state protected wetlands, also requires mitigation to offset losses of aquatic habitats. Additionally, work in the bed, channel, or bank of the river could require a Streambed Alteration Agreement with CDFW pursuant to Section 1602 of California Fish and Game Code.

Activities, including directional drilling, that have potential to divert or obstruct the natural flow or substantially change, or use any material from the bed, bank, or channel of Susan River or distributary streams would require notification of lake or streambed alteration be submitted to CDFW pursuant to Section 1602 of California Fish and Game Code. If the project design changes and direct impacts to Susan River are anticipated (such as jacking and boring the sewer line under the Susan River), the project proponent would need to acquire a CWA Section 404 permit from the USACE and a CWA Section 401 Water Quality Certification from the Lahontan RWQCB. This would be a **potentially significant** impact.

Mitigation Measures

Mitigation Measure 3.3-4: Avoid Impacts to Waters of the United States and state, Including Wetlands

- The project applicant shall design the project to avoid impacts to waters of the United States and state, including wetlands. If the project cannot be designed to avoid state or federally protected wetlands and other waters, the delineation report shall be submitted to USACE, and a jurisdictional determination shall be requested.
- If state or federally protected wetlands or waters are determined to be present within the project site that can be avoided, a qualified aquatic resources biologist (hereafter referenced as a qualified biologist) shall establish a buffer around wetlands and mark the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The buffer shall be a minimum width of 25 feet but may be larger if deemed necessary. The appropriate size and shape of the buffer zone shall be determined in coordination with the qualified biologist and shall depend on the type of wetland present (e.g., stream, fresh emergent wetland), the timing of project activities (e.g., wet or dry time of year), environmental conditions and terrain, and the project activity being implemented.

  Project activities (e.g., ground disturbance, vegetation removal, staging) shall be prohibited within the established buffer. The qualified biologist shall periodically inspect the materials demarcating the buffer to confirm that they are intact and visible, and wetland impacts are being avoided.
- If it is determined that fill of wetlands or other waters of the United States would result from project implementation, authorization for such fill shall be secured from USACE and the RWQCB through CWA Sections 401 and 404 permitting processes. In association with the Section 404 permit (if applicable) and prior to the issuance of any grading permit, Section 401 Water Quality Certification from the Lahontan RWQCB shall be obtained. For impacts on waters of the state and state protected wetlands that are not also waters of the United States and are therefore not covered by the 401 Water Quality Certification, the applicant shall apply to the Lahontan RWQCB for Waste Discharge Requirements following the State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State (SWRCB 2021). Any wetlands or other waters of the United States or waters of the state that are filled by the project shall be replaced or restored on a no-net-loss basis in accordance with the applicable USACE and California Water Board mitigation standards in place at the time of construction.

- Before commencing any activity, including directional drilling, that may divert the natural flow or otherwise alter the Susan River or other stream resources, including riparian habitat on, or with roots reaching to, the bank of the Susan River, the applicant shall notify CDFW through issuance of a Lake and Streambed Alteration Notification (notification). If CDFW determines, based on the notification, that project activities trigger the need for a Lake and Streambed Alteration Agreement, the proponent shall obtain an agreement from CDFW before the activity commences. The applicant shall conduct project construction activities in accordance with the agreement, including implementing reasonable measures in the agreement necessary to protect fish and wildlife resources, when working within the bed or bank of waterways or in riparian habitats associated with those waterways. These measures may include demarcation of the construction area, biological monitoring, preparation of an inadvertent release (frac-out) contingency plan for directional drilling, erosion control, environmental awareness training for construction crews, and compensatory measures (e.g., restoration, long-term habitat management.

Significance after Mitigation

Mitigation Measure 3.3-4 requires implementation of avoidance buffers and identifies additional procedures to follow to comply with State and federal regulations if it is determined that fill of waters of the United States or State would result from project implementation. While the project would result in the direct loss of the 0.48 acres of state-protected palustrine emergent wetlands on the project site, the majority of project activities would avoid wetland areas or would be prohibited within the wetland buffer. Additionally, as determined in the Aquatic Resources Delineation Report, there is a total of 4.37 acres of palustrine emergent wetlands in the aquatic resources study area. The loss of 0.48 acres therefore represents approximately a loss of 11 percent. The project would therefore not have a substantial adverse effect on state or federally protected wetlands, as the loss of 11 percent of palustrine emergent wetlands would not be considered substantial. Implementation of Mitigation Measure 3.3-4 would reduce impacts on potential fresh emergent wetlands to a **less than significant** level.

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3.4 CULTURAL RESOURCES

This section analyzes and evaluates the potential impacts of the project on known and unknown cultural resources. Cultural resources include districts, sites, buildings, structures, or objects generally older than 50 years and considered to be important to a culture, subculture, or community for scientific, traditional, religious, or other reasons. They include prehistoric resources and historic-period resources. Archaeological resources are locations where human activity has measurably altered the earth or left deposits of prehistoric or historic-period physical remains (e.g., stone tools, bottles, former roads, house foundations). Historical (or built-environment) resources include standing buildings (e.g., houses, barns, outbuildings, cabins) and intact structures (e.g., dams, bridges, roads, districts), or landscapes. A cultural landscape is defined as a geographic area (including both cultural and natural resources and the wildlife therein), associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values. Native American history and impacts on tribal cultural resources are discussed in Section 3.10, "Tribal Cultural Resources."

This evaluation is based on the Cultural Resources Technical Report completed by Ascent in May 2025 (Appendix E).

No comments in response to the NOP were received that identified concerns regarding cultural resources.

3.4.1 Regulatory Setting

FEDERAL

National Historic Preservation Act

Historic properties are protected through the National Historic Preservation Act (NHPA) of 1966 (54 US Code [USC] 470f) and its implementing regulations (16 USC 470 et seq., 36 Code of Federal Regulations [CFR] 800, 36 CFR 60, and 36 CFR 63). The NHPA establishes the federal government's policy on historic preservation and the programs, including the National Register of Historic Places (NRHP), through which that policy is implemented. Under the NHPA, historic properties include "any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places" (16 USC 470w (5)).

The formal criteria (36 CFR 60.4) for determining NRHP eligibility are as follows:

1) The property is at least 50 years old (however, properties under 50 years of age that are of exceptional importance or are contributors to a district can also be included in the NRHP);
2) It retains integrity of location, design, setting, materials, workmanship, feeling, and associations; and
3) It possesses at least one of the following characteristics:

   Criterion A Is associated with events that have made a significant contribution to the broad patterns of history (events).

   Criterion B Is associated with the lives of persons significant in the past (persons).

   Criterion C Embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant, distinguishable entity whose components may lack individual distinction (architecture).

   Criterion D Has yielded, or may be likely to yield, information important in prehistory or history (information potential).

For a property to retain and convey historic integrity it must possess most of the seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. Location is the place where the historic property was constructed or the place where a historic event occurred. Integrity of location refers to whether the property has been moved since its construction. Design is the combination of elements that create the form, plan, space, structure,

and style of a property. Setting is the physical environment of a historic property that illustrates the character of the place. Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property. Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory. Feeling is a property's expression of the aesthetic or historic sense of a particular period of time. This is an intangible quality evoked by physical features that reflect a sense of a past time and place. Association is the direct link between the important historic event or person and a historic property. Continuation of historic use and occupation help maintain integrity of association.

Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act (NAGPRA) (Public Law 101-601, 25 USC 3001 et seq., 104 Stat. 3048) was enacted on November 16, 1990. It provides for the repatriation and disposition of certain Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony. By enacting NAGPRA, Congress recognized that human remains of any ancestry "must at all times be treated with dignity and respect." The law also acknowledges that human remains, and other cultural items of Native American origin (which includes Native Hawaiian origin), removed from Federal or tribal lands belong, in the first instance, to lineal descendants, Indian Tribes, and Native Hawaiian organizations. Federal agencies and museums, universities, state agencies, local governments, or any institution that receives Federal funds must comply with NAGPRA. NAGPRA also establishes penalties for both criminal and civil violations related to the illegal possession or sale, purchase, profit, or transportation for sale or profit, of Native American human remains or cultural items illegally obtained from federal lands or museums, among other instances. Due to the fact the proposed project is located on national forest lands, any Native American human remains and/or funerary objects, sacred objects, and objects of cultural patrimony discovered during project-related investigations or during project implementation would be subject to NAGPRA.

STATE

California Register of Historical Resources

All properties in California that are listed in or formally determined eligible for listing in the NRHP are eligible for listing in the California Register of Historical Resources (CRHR). The CRHR is a listing of State of California resources that are significant in the context of California's history. It is a Statewide program with a scope and with criteria for inclusion similar to those used for the NRHP. In addition, properties designated under municipal, or county ordinances are also eligible for listing in the CRHR.

A historic resource must be significant at the local, state, or national level under one or more of the criteria defined in the California Code of Regulations (CCR) Title 15, Chapter 11.5, Section 4850 to be included in the CRHR. The CRHR criteria are tied to CEQA because any resource that meets the criteria below is considered a significant historical resource under CEQA. As noted above, all resources listed in or formally determined eligible for listing in the NRHP are automatically listed in the CRHR.

The CRHR uses four evaluation criteria for significance:

Criterion 1. Is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.

Criterion 2. Is associated with the lives of persons important to local, California, or national history.

Criterion 3. Embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of a master; or possesses high artistic values.

Criterion 4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

A property must have both significance and integrity to be considered eligible for listing in the CRHR. Loss of integrity, if sufficiently great, will overwhelm the historical significance of a resource and render it ineligible. Likewise, a resource can have complete integrity, but if it lacks significance, it must also be considered ineligible. Integrity is evaluated by regarding the property's retention of its location, design, setting, workmanship, materials, feeling, and

association to its period of significance. These seven factors can be roughly grouped into three types of integrity considerations. Location and setting relate to the relationship between the property and its environment. Design, materials, and workmanship, as they apply to historic buildings, relate to construction methods and architectural details. Feeling and association are the least objective of the seven factors and pertain to the overall ability of the property to convey a sense of the historical time and place in which it was constructed.

California Environmental Quality Act

CEQA requires public agencies to consider the effects of their actions on "historical resources," and "unique archaeological resources." Pursuant to Public Resources Code (PRC) Section 21084.1, a "project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment." Section 21083.2 requires agencies to determine whether projects would have effects on unique archaeological resources.

Historical Resources

"Historical resource" is a term with a defined statutory meaning (PRC Section 21084.1; State CEQA Guidelines Sections 15064.5[a] and [b]). Under State CEQA Guidelines Section 15064.5(a), historical resources include the following:

1) A resource listed in or determined to be eligible by the State Historical Resources Commission for listing in, the CRHR (PRC Section 5024.1).

2) A resource included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g), will be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

3) Any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource will be considered by the lead agency to be historically significant if the resource meets the criteria for listing in the CRHR (PRC Section 5024.1).

4) The fact that a resource is not listed in or determined to be eligible for listing in the CRHR, not included in a local register of historical resources (pursuant to PRC Section 5020.1[k]) or identified in a historical resources survey (meeting the criteria in PRC Section 5024.1[g]) does not preclude a lead agency from determining that the resource may be a historical resource as defined in PRC Sections 5020.1(j) or 5024.1.

Unique Archaeological Resources

CEQA also requires lead agencies to consider whether projects will affect unique archaeological resources. PRC Section 21083.2(g) states that "unique archaeological resource" means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets one or more of the following criteria:

1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.

2) Has a special and particular quality such as being the oldest of its type or the best available example of its type.

3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Public Resources Code Section 21083.2

Treatment options under PRC Section 21083.2 (b) to mitigate impacts to archaeological resources include activities that preserve such resources in place in an undisturbed state. PRC Section 21083.2 states:

(a) As part of the determination made pursuant to Section 21080.1, the lead agency shall determine whether the project may have a significant effect on archaeological resources. If the lead agency determines that the project

may have a significant effect on unique archaeological resources, the environmental impact report shall address the issue of those resources. An environmental impact report, if otherwise necessary, shall not address the issue of nonunique archaeological resources. A negative declaration shall be issued with respect to a project if, but for the issue of nonunique archaeological resources, the negative declaration would be otherwise issued.

(b) If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. Examples of that treatment, in no order of preference, may include, but are not limited to, any of the following:

1) Planning construction to avoid archaeological sites.

2) Deeding archaeological sites into permanent conservation easements.

3) Capping or covering archaeological sites with a layer of soil before building on the sites.

4) Planning parks, greenspace, or other open space to incorporate archaeological sites.

(c) To the extent that unique archaeological resources are not preserved in place or not left in an undisturbed state, mitigation measures shall be required as provided in this subdivision.

(d) Excavation as mitigation shall be restricted to those parts of the unique archaeological resource that would be damaged or destroyed by the project.

California Native American Historical, Cultural, and Sacred Sites Act

The California Native American Historical, Cultural, and Sacred Sites Act (PRC Section 5097.9) applies to both State and private lands. The act requires, upon discovery of human remains, that construction or excavation activity cease and that the county coroner be notified. If the remains are those of a Native American, the coroner must notify the Native American Heritage Commission (NAHC), which notifies (and has the authority to designate) the most likely descendants of the deceased. The act stipulates the procedures the descendants may follow for treating or disposing of the remains and associated grave goods.

The subject of Tribal Cultural Resources, a specific category of cultural resources recognized by special statutes in CEQA, is addressed in Section 3.10 of this Draft EIR. For ease of administration, however, Mitigation Measure 3.4-1b, as set forth below, addresses potential impacts associated with tribal cultural resources that might be encountered during construction. The same measure also addresses potential impacts on any unique archaeological resources or historical resources of an archaeological nature that might also be encountered during construction.

Health and Safety Code, Sections 7050.5

Section 7050.5 of the Health and Safety Code requires that construction or excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If they are determined to be those of a Native American, the coroner must contact NAHC.

Public Resources Code, Section 5097

PRC Section 5097 specifies the procedures to be followed in the event of the unexpected discovery of human remains on nonfederal land. The disposition of Native American human burials falls within the jurisdiction of the NAHC. Section 5097.5 of the Code states the following:

> No person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor.

LOCAL

Susanville General Plan 1990-2010

Susanville's General Plan was adopted in 1991 and the City is in the process of updating the various elements of the General Plan. As of mid-2025, the City has adopted updates to the Land Use, Circulation, and Housing Elements, and plans to update the remaining elements. Because the City has not completed the update to Open Space, Parks, Recreation, and Child Care Element, this analysis relies on the current version of that element, adopted in 1991, which contains the following program and policy related to archaeological resources that are relevant to the project (City of Susanville 2006):

- **Action program [49]:** All development applications and public projects that require EIRs will routinely be sent to the "California Archaeological Inventory—Northeast Information Center" at the Department of Anthropology, Chico State University, for review and recommendations regarding archaeological findings.

  In those areas identified as being the actual or probable sites of archaeological remains, any projects on City land or requiring the issuance of permits by the City will be investigated during plan review to determine whether valuable archaeological remains will be affected by the project. Upon the first discovery of any archaeological findings, development activity will be halted until professional archaeological examination and preservation is accomplished.

- **Policy aj.** The City shall take all possible precautions to insure that no action by the City or County results in the loss of the irreplaceable archaeological record present in the City's planning jurisdiction, and shall work with the County toward that end.

Susanville Vicinity Area Plan

The Susanville Vicinity Area Plan and Environmental Impact Report (Lassen County 1984) contains the following policies related to cultural resources that are relevant to the project:

4. Social and Cultural.

B. ISSUE: Cultural Resources

GOAL AND OBJECTIVE: Protect the planning area's historic and archeological resources and encourage appropriate opportunities for public experience and academic study of these resources under controlled conditions.

- **Policy 10.1:** The County shall preserve and protect the cultural resources of the planning area. Implementation
- **Policy 10.11:** Development projects shall be designed to minimize their impact on cultural resources. Any discoveries of archeological resources during construction, shall be reported for mitigation.
- **Policy 10.12:** A cultural resources map should be maintained by the County Planning Department and used in the review process of land development projects.
- **Policy 10.13:** Archeological reconnaissance should be conducted whenever it appears that cultural resources may be disrupted by a proposed development project.

3.4.2 Environmental Setting

The study area for cultural resources encompasses 83 acres, where potential direct and indirect impacts on cultural resources could occur, which is the 79.6-acre project parcel and offsite utility areas. The study area includes the area of potential ground disturbance, which encompasses 16.3 acres, which is the 14.15-acre project site and offsite utility areas.

Native American Precontact Setting

The following Native American precontact setting, ethnographic history information is based on the *Archaeological Survey Report Susanville Southeast Gateway, Lassen County, California, SR 36 PM 26.2 to PM 26.5, District 2, PPNO*

3492, prepared by WSA, Inc. (WSA 2017). The western Great Basin has been the focus of intensive and very productive archaeological research, although prior to the 1970s archaeological studies and dates tended to be site specific.

Early Holocene (10,000 to 7,000 BP)

The earliest period is the Early Holocene and dates between 10,000 to 7,000 before present (BP). Although these sites are rare, Early Holocene sites represent the earliest recorded occupation of the western Great Basin. Artifact assemblages associated with the Early Holocene compare to other early Great Basin assemblages, and are usually characterized by Great Basin Stemmed series projectile points, crescents, a variety of steep-sided formed flaked tools, and bifacial thinning debris.

Post-Mazama (7,000 to 5,000 BP)

Post-Mazama archaeological record transition between a "Pluvial Lakes Tradition" which characterizes the preceding Early Holocene Period, and one typical of the Great Basin Archaic. Components dating to this period include Northern Side-notched projectile points and a diffuse, but more varied assortment of hunting and processing tools typical of high residential mobility. Settlements began to move away from lake shores and towards more limited optimum subsistence localities such as the Sierran Front. These locations may have served as a refuge for geographically disparate populations at the height of mid-Holocene warming.

Early Archaic (5,000 to 3,500 BP)

The transition from Pre-Archaic to Archaic adaptive strategies most likely occurred in response to several factors that were centered around environmental fluctuations and ecological shifts, which took place during the Early Holocene. In the Honey Lake Basin, sites located in lakeshore contexts that had been the focus of previous occupations were now confined to nearby springs and pond areas where water supplies were perhaps more reliable. Compared to adaptive strategies of the Early Holocene, ground to flaked stone implements appear to have increased, suggesting a broadening of the subsistence base with a focus on the processing and storage.

Early Archaic processing assemblages from the Tuscarora Pipeline project do not contain sufficient data to allow comment on the character or intensity of vegetal processing activities. The existence of the "Milling Stone Horizon" in northeastern California, which he sees as a generalized hunting and gathering tradition geared toward the intensive exploitation of plant resources.

Middle Archaic (3,500 to 1,300 BP)

The Middle Archaic in the Lahontan Basin is thought to span the time period from approximately 3500 to 1300 BP and was associated with a cool, moist climatic interval. The transition between the Early and Middle Archaic is seen through a gradual shift in settlement/subsistence patterns along with the stylistic elaboration and increases in local population densities. There was an increase in archaeological visibility during the Middle Archaic Period for northeastern California. For instance, many of the most elaborate regional archaeological manifestations.

During the Middle Archaic, there was an intensification of plant and faunal resources, and the hunting of large game appears to have continued throughout. However, the presence of rabbit and other small rodents in the faunal assemblages along with the grinding implements suggest that changes were occurring with regards to subsistence practices with a greater diversity of utilized species. Winter sites and seasonal base camps appeared to have been consistently reoccupied, with winter villages possessing semi-subterranean pit houses and interior features such as hearths, storage pits and burials.

Late Archaic (1,300 BP to 600 BP)

For northeastern California, the Late Archaic includes several cultural changes which may have been triggered by population increases, and a response to a warmer, drier climatic trend which peaked sometime around 1500 BP During the Late Archaic period, the atlatl and dart were replaced by the bow and arrow and other smaller and lighter projectile points such as the Eastgate and Rose Spring series. Technological changes occurred to lithic resources in regard to the production of expediently made flake tools from locally available materials rather than the use of quarried raw materials. Plant processing equipment became more abundant and elaborate within the site assemblages across the region during this period. These assemblages suggest a reorganization of the settlement-subsistence

adaptation, based on a major intensification in the exploitation of roots and other plant resources. This also suggests that plant foods and small game were exploited at the expense of large game. Overall, the subsistence strategy during the Late Archaic involved a continued increase in both the diversity of resources being utilized as well as the variety of habitats exploited. These changes are thought to reflect a decreased foraging mobility and territoriality.

Terminal Precontact (600 BP to European Contact)

Throughout the broader interface between Great Basin and California-oriented populations in this region, large seasonal or semi-permanent, Late Archaic settlements were abandoned and replaced by smaller sites inhabited by one or a few independent households. This shift to smaller settlements also created significant reduction in the logistical procurement of resources, most of which were now exploited daily from residential encampments. Much of the same pattern is reflected in a lack of specialized implements, with the artifact assemblages being extremely similar between sites and comprised predominantly of expedient implements.

Several Terminal Prehistoric habitation sites were documented along the Tuscarora and Alturas corridors, the most important being a large habitation complex within Crooks Canyon, near Likely. Their settlement pattern represented by these residential components was most likely defensive in nature, perhaps a response to the social instability during the very end of the prehistoric period. Prehistoric occupation in the region is thought to be represented by the residues of small, family-level bands of Numic ancestry who exploited resources mostly from residential encampments.

EUROMERICAN HISTORIC SETTING

Lassen County History

In the 1840s, John C. Fremont and his army followed the trails left behind by fur trappers exploring the area in the 1830s to prepare for the Bear Flag revolt, which led to the creation of California (Lassen County 2024).

With the Gold Rush of 1849 and emigrants following established trail routes through the area, it was not until 1854 that the area began to take shape, as a trading post was established on the west end of Honey Lake Valley. A small gold rush just south of the trading post two years later caused the permanent settlement of Honey Lake Valley and Lassen County.

In 1863, due to a growing dispute over land boundaries and taxes, the Sagebrush War ensued. After a victorious end for the residents in the area, Lassen County was created.

By 1880, many settlements had sprung up in the area, and the railroad industry had begun to develop interests in the area. The Nevada-California-Oregon Railway, which operated from 1880 to 1927, was the longest narrow-gauge line in the nation in this century, traversing the eastern side of the County and assisted in the development of the high desert region of eastern Lassen. The Fernley & Lassen Railroad, built in 1913, tapped into western Lassen's timber resources.

Also shaping the area at that time was the lumber industry, particularly the Red River Lumber Company of Westwood, the world's largest electrical sawmill of that time, and two other large mills which developed in the Susanville area (Lassen County 2024).

Susanville History

Situated at 4,186 feet elevation along the Susan River on the northeastern corner of the Sierra Nevada, the city of Susanville has a unique and colorful history, established in the aftermath of an 1863 skirmish called the Sagebrush War. Before the war, the area was known as Rooptown, named after the Isaac Roop, one of thousands of emigrants who camped at the foot of the Sierra Nevada before making the final push to the coast. Rooptown was a popular stopover thanks to its lush grasses and ample water, something emigrants hadn’t seen for hundreds of miles while crossing the Nevada desert (SBTS 2024).

In 1853, Isaac Roop constructed a cabin that became a trading post, and later, a fortification used during the Sagebrush War. The war was rooted in a boundary dispute about Rooptown and whether it was in Plumas County of California or Roop County in the Nevada Territory. The citizens of the area played both sides against each other, refusing to pay taxes when either territory’s officials would appear to collect, claiming they were residents of the other territory.

Soon this lack of tax collection came to a head, and after legal wrangling between the two territories could not solve the problem, posses were formed and a gun battle between the two counties ensued, using Roop's cabin as a stronghold against Plumas County, which became known as Fort Defiance. After four hours of shots fired back and forth with only a few non-lethal casualties, both sides realized this dispute wasn't worth dying over. To this day, Roop's cabin stands, bullet holes and all.

As a result, the California/Nevada border was resurveyed from Lake Tahoe to the Oregon border, and the results showed Rooptown in the state of California. To appease the residents who did not want to be annexed into Plumas County, the state legislature created Lassen County in 1864, making the new town of Susanville (named after Susan Roop) the county seat, which it remains to this day.

Susanville had a long stretch of economic health thanks to strong logging, farming and mining economies. But by the 1960s, these industries waned, landing the community in economic hardship. Susanville had the California Correctional Center that opened in 1963, but it wasn't until the construction of the High Desert State Prison, California in 1995 that Susanville experienced significant population and economic growth (SBTS 2024).

RECORDS SEARCHES AND SURVEYS

On November 26, 2024, a records search that included the area of potential ground disturbance and a one-half-mile radius was completed at the Northeast Information Center (NEIC) at California State University, Chico (File No. NE24-554). As part of the NEIC records search, the following information was reviewed:

- site records of previously recorded cultural resources,
- previous cultural studies,
- NRHP and CRHR listings,
- the California Historic Resources Inventory,
- Built Environment Resource Directory for Lassen County, and
- Historical Maps (US Geological Survey [USGS] Topographic and General Land Office [GLO] Plat maps).

Review of the NEIC records search results for the study area did not identify any previously recorded resources within the study area. Two resources were previously recorded within one-half-mile radius of the study area: P-18-005680 is a bedrock milling feature, and P-18-001679 is a railroad grade and has associated features such as foundations, structure pads, and trash dumps. The records search also found that two previous investigations have occurred within the study area, which together cover approximately one percent of the study area. In addition, seven investigations have occurred within one-half-mile of the study area.

Additional research included the review of historic USGS topographic maps from 1954 to 2021 (NETR 2024). Aerial imagery from 1963 identifies numerous structures on the project site, and sewage disposal/treatment ponds and a railway spur to the west of the project site. By 2016 all structures had been removed and no evidence of the sewage treatment and railway spur remained; therefore, all potential development within the project site vicinity would not be historic of age (i.e., 45 years or older). GLO plat maps were also reviewed; review of the 1864 plat map revealed that the study area was undeveloped (BLM 2024). The topographic maps did not reveal any development within the study area. The 1864 GLO plat map revealed an unnamed road adjacent to the study area. It appears that this road became the railroad identified in the records search results (P-18-005680).

An intensive pedestrian survey of the area of potential ground disturbance was conducted on December 7, 2024. All open areas where the ground was visible were closely examined. Special attention was given to bare patches of ground, exposed soils, rodent burrows, and dirt piles. Ground visibility was poor (0 to 15 percent visible) because most of the area of potential ground disturbance was covered in dense, dry grasses that were three feet tall in most areas. During the pedestrian survey, all visible ground surface in the area of potential ground disturbance was carefully examined for cultural material (e.g., flaked stone tools, tool-making debris, stone milling tools, or fire-affected rock), soil discoloration that might indicate the presence of a cultural midden, soil depressions and features

indicative of the former presence of structures or buildings (e.g., postholes, foundations), or historic-era debris (e.g., metal, glass, ceramics). Ground disturbances (e.g., animal burrows, embankments, graveled or dirt roads) were visually inspected. No archaeological resources were discovered as a result of this survey.

Potential for Buried Archaeological Deposits

Archaeological resources are features, such as tools, utensils, carvings, fabric, and building foundations, that document evidence of past human endeavors and that may be historically or culturally important to an earlier community.

The study area is underlain with Quaternary Lake Deposits. The surficial soils within the study area are the Blickenstaff, Susanville, Truckee, Lakeview, and Springmeyer series (Mulvaney 2024; UCD SoilWeb 2024). Because the Quaternary material formed long before the first human occupation of the area (11,000 to 30,000 years before present), it is unlikely to contain or to have buried archaeological resources. The predominant (90 percent) overlying soil of the study area is the Blickenstaff, which formed in alluvium derived from granite dating to the Middle Holocene (4,000 to 2,000 BP; Rosenthal and Meyer 2004a, 2004b) and so are generally more sensitive for buried cultural remains.

Landscape evolution and historic and modern development can affect the visibility of the archaeological record, but research has shown that archaeological sites tend to occur in specific geo-environmental settings (e.g., near reliable water sources and on stable land surfaces) rather than randomly throughout the landscape. For example, geoarchaeological studies have found that distance to water sources (e.g., stream, lake, spring) and landform slope (generally less than 18 percent) are two environmental variables that help accurately predict a location's potential to contain buried archaeological deposits (e.g., Caltrans 2010; Caltrans 2008; Rosenthal and Meyer 2004a, 2004b). The study area is undeveloped and the topography of the terrain is relatively flat. The Susan Rivers runs roughly east/west directly north of the study area. The age of the soils present, history of land use, and the negative results of the pedestrian survey suggest that the potential for the presence of buried deposits of cultural resources in the study area is moderate.

3.4.3 Impacts and Mitigation Measures

METHODOLOGY

The impact analysis for archaeological and historical resources is based on the findings and recommendations of the Cultural Resources Technical Report completed by Ascent in May 2025 (Appendix E). The analysis is also informed by the provisions and requirements of federal, state, and local laws and regulations that apply to cultural resources.

PRC Section 21083.2(g) defines a "unique archaeological resource" as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets one or more of the following CRHR-related criteria: (1) that it contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; (2) that it as a special and particular quality, such as being the oldest of its type or the best available example of its type; or (3) that it is directly associated with a scientifically recognized important prehistoric or historic event or person. An impact on a resource that is not unique is not a significant environmental impact under CEQA (State CEQA Guidelines Section 15064.5[c][4]). If an archaeological resource qualifies as a resource under CRHR criteria, then the resource is treated as a unique archaeological resource for the purposes of CEQA.

The CEQA Guidelines recognize that the broad term "historical resources" can apply to both above-ground and below-ground resources (i.e., archaeological resources). Thus, as to the latter, CEQA Guidelines section 15125.4[b][3] refers to "historical resource[s] of an archaeological nature." This subsurface category of resources overlaps with "unique archaeological resources."

The criteria for eligibility in the California Register of Historical Resources (CRHR), which track those for qualifying as "historical resources," largely subsume the criteria for unique archaeological resources, but the two sets of criteria use somewhat different wording. The definitional criteria for "historical resources" were added to CEQA in 1992 with the enactment of Public Resources Code section 21084.1 and are generally considered broader and more protective than

the criteria for unique archaeological resources found in Public Resources Code section 21083.2(g), which was enacted in 1982. Table 3.4-1 shows the similarities in the two sets of criteria:

Table 3.4-1 Comparison between the definitional criteria for historical resources

Unique Archaeological Resource	Criteria for Listing on CRHR
"Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information" (§ 21083.2(g)(1))	"Has yielded, or may be likely to yield, information important in prehistory or history" (§ 15064.5(a)(3)(D))
"Has a special and particular quality such as being the oldest of its type or the best available example of its type" (§ 21083.2(g)(2))	"Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values" (§ 15064.5(a)(3)(C))
"Is directly associated with a scientifically recognized important prehistoric or historic event or person" (§ 21083.2(g)(3))	"(A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage; (B) Is associated with the lives of persons important in our past" (§ 15064.5(a)(3)(A), (B))

Source: Public Resources Code section 21084.1 and Public Resources Code section 21083.2(g).

Under these definitional criteria, it is very likely that an archaeological resource that is determined to be eligible for listing on the CRHR, and thus qualifies as a historical resource of an archaeological nature, will also qualify as a unique archaeological resource. The discussion below will treat these two categories as being essentially the same, but will use the more conservative language associated with historical resources of an archaeological nature in the event of a possible conflict between the two categories.

For the purposes of the impact discussion, the term "historical resource" is used to describe built-environment historic-period resources. Archaeological resources (both prehistoric and historic-period), including both "unique archaeological resources" and "historical resources of an archaeological nature," are analyzed separately from built-environment historical resources.

THRESHOLDS OF SIGNIFICANCE

Appendix G of the CEQA Guidelines, which is a sample Initial Study checklist, includes inquiries regarding the impacts that proposed projects may have on cultural resources. It is a common practice for lead agencies, in their discretion, to use the inquiries found in Appendix G for purposes of fashioning significance thresholds.

On this particular topic, however, the Legislature and the California Natural Resources Agency have provided direction that limits lead agencies' discretion to some degree. Public Resources Code section 21084.1 states that "[a] project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment." This language operates as a kind of legally-mandated significance threshold.

Based on this language, CEQA Guidelines Section 15064.5[b][1] states that "[s]ubstantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired." Subdivision [b][2] of Section 15064.5 goes on to say that "[t]he significance of an historical resource is materially impaired when a project: (A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or (B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or (C) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA."

Finally, CEQA Guidelines section 15065[a][1] states that a proposed project may have a significant effect where it would "eliminate important examples of the major periods of California history or prehistory."

Based on the inquiries in Appendix G of the State CEQA Guidelines, as well as the language of Public Resources Code section 21084.1 and CEQA Guidelines Section 15064.5, the City has exercised its discretion to conclude that the proposed project would result in a significant impact on cultural resources if it would:

- cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 of the State CEQA Guidelines (i.e., result in physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired);
- cause a substantial adverse change in the significance of a unique archaeological resource or an historical resource of an archaeological nature pursuant to Section 15064.5 of the State CEQA Guidelines;
- eliminate important examples of the major periods of California history or prehistory; or
- disturb any human remains, including those interred outside of formal cemeteries.

ISSUES NOT DISCUSSED FURTHER

Historical Resources

As discussed in Section 3.4.2, "Environmental Setting," no above-ground historical resources were identified in the area of potential ground disturbance. Therefore, project construction and operation would have no impact on historical resources. This issue is not analyzed further.

Human Remains

Project construction would require excavation to a depth of approximately 10 feet that would extend into native soils, with the potential to encounter previously unknown human remains. A number of existing regulatory provisions mandate requirements for the handling of human remains inadvertently uncovered during excavation activities. These include State Health and Safety Code Section 7050.5, Public Resources Code Section 5097.98, and CEQA Guidelines Section 15064.5(e). Pursuant to these codes, in the event of the discovery of unrecorded human remains during construction, excavations shall be halted, and the County Coroner shall be notified. If the human remains are determined to be Native American, the NAHC would be notified within 24 hours and the guidelines of the NAHC would be adhered to in the treatment and disposition of the remains. Compliance with these regulatory protocols would ensure that impacts on human remains would be less than significant. This issue is not analyzed further.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 3.4-1: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources or any Historical Resources of an Archaeological Nature

The study area has a moderate sensitivity for intact buried archaeological resources. Although no archaeological resources were identified within the area of potential ground disturbance, project-related grading and excavation could result in the unanticipated discovery or damage of yet undiscovered unique archaeological resources as defined in Public Resources Code section 21083.2[g] or historical resources of an archaeological nature as defined State CEQA Guidelines Section 15064.5[a]. This impact would be **potentially significant**.

Minimal grading would be required to construct the project because the project site is relatively flat; however, ground disturbance would be required for excavation of building foundations, the high-rise sign, and bioretention ponds. As described in Section 3.4.2, "Environmental Setting," the background research (including the NEIC record search results and literature review) and pedestrian field survey failed to identify the presence of archaeological resources, including those that could be considered important examples from major periods of California history or prehistory, within the area of potential ground disturbance. However, the analysis of the geoarchaeological data concluded that

the study area has a moderate sensitivity for intact buried archaeological resources. Ground-disturbing activities have potential to encounter previously undiscovered or unrecorded archaeological sites and materials, which could result in damage or destruction to these resources, and/or eliminate important examples from major periods of California history or prehistory. This impact would be **potentially significant**.

Mitigation Measures

Mitigation Measure 3.4-1a: Worker Awareness Training

Prior to the initiation of project construction, the project applicant shall ensure that all crew members and contractors conducting ground-disturbing activities receive training overseen by a qualified professional archaeologist on the protection of sensitive archaeological, historical, and tribal cultural resources. As part of the training, workers shall be instructed to halt work if cultural resources are encountered during ground-disturbing activities. In addition, workers shall be instructed to not return to work in the location of the find until instructed to do so by management.

Mitigation Measure 3.4-1b: For All Ground-Disturbing Construction Activities, Halt Ground Disturbance Upon Discovery of Subsurface Archaeological Features

If archaeological materials (e.g., locally darkened soils [i.e., midden], stone tools, chipped stone, baked clay, or concentrations of shell, bone, charcoal, glass, metal, or ceramics) are inadvertently discovered during ground-disturbing activities, the contractor shall cease all work within 100 feet (30.5 meters) of the find and the project applicant shall immediately retain the services of a qualified professional archaeologist. At that time, the City's Manager or their designee (Manager) shall coordinate any necessary investigation of the site with the archaeologist as needed to evaluate the significance of the resource per PRC Sections 5024.1, 21083.2(g), and 21074 (i.e., to determine whether the resource qualifies as a unique archaeological resource, a historical resource of an archaeological nature, or a tribal cultural resource) and provide proper management recommendations. If the qualified archaeologist determines that the discovered resource qualifies as, or includes, unique archaeological resources, historical resources of an archaeological nature, or tribal cultural resources, the qualified archaeologist shall develop mitigation or treatment measures for consideration and approval by the Manager in consultation with the project applicant. The Manager may also consult with the State Historic Preservation Officer [SHPO], a representative of any Native American Tribe potentially interested in a possible tribal cultural resource, or any other regulatory agency that the Manager believes may have informed and useful input to provide. Mitigation shall be developed and implemented in accordance with Public Resources Code Section 21083.2 and Section 15126.4 of the CEQA Guidelines, with a preference for preservation in place. Consistent with Section 15126.4(b)(3), preservation in place may be accomplished through one or more of the following: planning construction to avoid the resource; incorporating the resource within open space; capping and covering the resource; or deeding the site into a permanent conservation easement. If approved by the Manager, such measures shall be implemented and completed prior to commencing further work for which grading or building permits were issued, unless otherwise directed by the Manager. Avoidance or preservation of unique archaeological resources, historical resources of an archaeological nature, or tribal cultural resources shall not be required where such avoidance or preservation in place would preclude the construction of important project structures or project infrastructure or would require exorbitant expenditures, as determined by the Manager in consultation with the project applicant. Where avoidance or preservation are not appropriate for these reasons, the qualified archaeologist, in consultation with the Manager, shall prepare a detailed recommended treatment plan for consideration and approval by the Manager, which may include data recovery. Where tribal cultural resources are involved, the Manager shall also consult with any known representative of a Native American Tribe potentially interested in the tribal cultural resource. If employed, data recovery strategies for unique archaeological resources that do not also qualify as historical resources of an archaeological nature shall follow the applicable requirements and limitations set forth in Public Resources Code Section 21083.2. Where tribal cultural resources are involved, data recovery shall not occur over the objections of any known representative of a Native American Tribe potentially interested in the tribal cultural resource. Data recovery will normally consist of (but would not be limited to) sample excavation, artifact collection, site documentation, and historical research, with the aim of recovering important scientific data contained within the unique archaeological resource or historical resource of an archaeological nature. The data recovery plan shall include provisions for analysis

of data in a regional context, reporting of results within a timely manner, curation of artifacts and data at an approved facility, and dissemination of reports to local and State repositories, libraries, and interested professionals. If data recovery is determined by the Manager or a tribal representative to be inappropriate, then an equally effective treatment shall be proposed and implemented. Where tribal cultural resources are involved, the Manager, in formulating a treatment strategy, shall consult with any known representative of a Native American Tribe potentially interested in the tribal cultural resource. No treatment strategy for tribal cultural resources shall be approved over the objections of such a tribal representative. Work may not resume within the no-work radius until the Manager, in consultation with the qualified archaeologist, determines that the site either: 1) does not contain unique archaeological resources, historical resources of an archaeological nature, or tribal cultural resources; or 2) that the preservation and/or treatment measures have been completed to the Manager's satisfaction.

Significance after Mitigation

Mitigation Measures 3.4-1a and 3.4-1b identify procedures that would minimize the potential for construction activities to damage or destroy any unique archaeological resources, historical resources of an archaeological nature, or important examples from major periods of California history or prehistory that may be inadvertently uncovered during ground-disturbing activities. Specifically, Mitigation Measure 3.4-1a would require construction workers to undergo worker awareness training to be informed of the procedures to follow in the event of an unanticipated discovery. Mitigation Measure 3.4-1b identifies requirements to halt construction activities in the vicinity of any unanticipated discoveries until a qualified professional archaeologist can assess the significance of the find and provide the City's Manager with recommendations for the appropriate disposition of the resource. Preference would be given to preservation in place. Compliance with these mitigation measures would reduce potential impacts on archaeological resources to a **less-than-significant** level.

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3.5 ENERGY

This section evaluates whether implementation of the project would result in inefficient, wasteful, and unnecessary consumption of energy. The capacity of existing and proposed infrastructure to serve the project is evaluated in Section 3.10, "Utilities and Service Systems." Detailed calculations of energy consumption and results can be found in Appendix C.

No comments in response to the NOP were received that identified concerns regarding energy impacts.

3.5.1 Regulatory Setting

Energy conservation is embodied in many federal, state, and local statutes and policies. At the federal level, energy standards apply to numerous products (e.g., the US Environmental Protection Agency's [EPA] EnergyStar™ program) and transportation (e.g., fuel efficiency standards). At the state level, Title 24 of the California Code of Regulations sets forth energy standards for buildings. Further, the state provides rebates/tax credits for installation of renewable energy systems and offers the Flex Your Power program promotes conservation in multiple areas. At the local level, individual cities and counties establish policies in their general plans and climate action plans (CAPs) related to the energy efficiency of new development and land use planning and to the use of renewable energy sources.

FEDERAL

There is no overarching federal law specifically related to energy conservation. Additionally, in March 2025, the current administration announced that EPA will undertake 31 actions, focusing primarily on reconsidering actions adopted by previous administrations, including numerous actions and regulations related to the reduction of GHG emissions that could also affect energy consumption. These include, but are not limited to, reconsideration of regulations related to fuel economy standards, power plants, among others. As of the writing of this Draft EIR, none of these regulations have been repealed or replaced with newly adopted regulations. Therefore, these regulations are discussed below.

Energy Policy and Conservation Act, and CAFE Standards

The Energy Policy and Conservation Act of 1975 established nationwide fuel economy standards to conserve oil. Pursuant to this Act, the National Highway Traffic and Safety Administration, part of the US Department of Transportation (DOT), is responsible for revising existing fuel economy standards and establishing new vehicle economy standards.

The Corporate Average Fuel Economy (CAFE) program was established to determine vehicle manufacturer compliance with the government's fuel economy standards. Compliance with the CAFE standards is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the country. EPA calculates a CAFE value for each manufacturer based on the city and highway fuel economy test results and vehicle sales. The CAFE values are a weighted harmonic average of the EPA city and highway fuel economy test results. Based on information generated under the CAFE program, DOT is authorized to assess penalties for noncompliance. Under the Energy Independence and Security Act of 2007 (described below), the CAFE standards were revised for the first time in 30 years.

Energy Policy Act of 1992 and 2005

The Energy Policy Act of 1992 (EPAct) was passed to reduce the country's dependence on foreign petroleum and improve air quality. EPAct includes several parts intended to build an inventory of alternative fuel vehicles (AFVs) in large, centrally-fueled fleets in metropolitan areas. EPAct requires certain federal, state, and local government and private fleets to purchase a percentage of light-duty AFVs capable of running on alternative fuels each year. In addition, financial incentives are also included in EPAct. Federal tax deductions are allowed for businesses and individuals to cover the incremental cost of AFVs. States are also required by the act to consider a variety of incentive

programs to help promote AFVs. The Energy Policy Act of 2005 provides renewed and expanded tax credits for electricity generated by qualified energy sources, such as landfill gas; provides bond financing, tax incentives, grants, and loan guarantees for clean renewable energy and rural community electrification; and establishes a federal purchase requirement for renewable energy.

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 is designed to improve vehicle fuel economy and help reduce US dependence on oil. It represents a major step forward in expanding the production of renewable fuels, reducing dependence on oil, and confronting global climate change. The Energy Independence and Security Act of 2007 increases the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel in 2022, which represents a nearly five-fold increase over current levels; and reduces US demand for oil by setting a national fuel economy standard of 35 miles per gallon by 2020—an increase in fuel economy standards of 40 percent.

By addressing renewable fuels and the CAFE standards, the Energy Independence and Security Act of 2007 builds upon progress made by the Energy Policy Act of 2005 in setting out a comprehensive national energy strategy for the 21st century.

STATE

Warren-Alquist Act

The 1975 Warren-Alquist Act established the California Energy Resources Conservation and Development Commission, now known as the California Energy Commission (CEC). The Act established state policy to reduce wasteful, uneconomical, and unnecessary uses of energy by employing a range of measures. The California Public Utilities Commission (CPUC) regulates privately-owned utilities in the energy, rail, telecommunications, and water fields.

State of California Energy Action Plan

CEC is responsible for preparing the State Energy Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The first Energy Action Plan (EAP) emerged in 2003 from a crisis atmosphere in California's energy markets. The state's three major energy policy agencies (CEC, CPUC, and the Consumer Power and Conservation Financing Authority [established under deregulation and now defunct]) came together to develop one high-level, coherent approach to meeting California's electricity and natural gas needs. It was the first time that energy policy agencies formally collaborated to define a common vision and set of strategies to address California's future energy needs and emphasize the importance of the impacts of energy policy on the California environment.

In the October 2005 *Energy Action Plan II*, CEC and CPUC updated their energy policy vision by adding some important dimensions to the policy areas included in the original EAP, such as the emerging importance of climate change, transportation-related energy issues and research and development activities. CEC adopted an update to the EAP II in February 2008 that supplements the earlier EAPs and examines the state's ongoing actions in the context of global climate change.

The current plan is the 2019 *California Energy Action Plan* which was published in November 2019. The plan calls for the state to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero-emission vehicles and addressing their infrastructure needs; and encouragement of urban design that reduces vehicle miles traveled (VMT) and accommodates pedestrian and bicycle access (CEC 2019).

Assembly Bill 2076: Reducing Dependence on Petroleum

Pursuant to Assembly Bill (AB) 2076 (Chapter 936, Statutes of 2000), CEC and the California Air Resources Board (CARB) prepared and adopted a joint agency report in 2003, Reducing California's Petroleum Dependence. Included

in this report are recommendations to increase the use of alternative fuels to 20 percent of on-road transportation fuel use by 2020 and 30 percent by 2030, significantly increase the efficiency of motor vehicles, and reduce per capita VMT (CEC 2003). Further, in response to the CEC's 2003 and 2005 Integrated Energy Policy Reports, Governor Davis directed CEC to take the lead in developing a long-term plan to increase alternative fuel use. A performance-based goal of AB 2076 was to reduce petroleum demand to 15 percent below 2003 demand by 2020 and maintaining that level for the foreseeable future.

Integrated Energy Policy Report

Senate Bill (SB) 1389 (Chapter 568, Statutes of 2002) required CEC to: "conduct assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery and distribution, demand, and prices. The Energy Commission shall use these assessments and forecasts to develop energy policies that conserve resources, protect the environment, ensure energy reliability, enhance the state's economy, and protect public health and safety" (Public Resources Code [PRC] Section 25301[a]). This work culminated in the Integrated Energy Policy Report (IEPR).

CEC adopts an IEPR every two years and an update every other year. The 2021 IEPR is the most recent IEPR. The 2021 IEPR provides a summary of priority energy issues currently facing the state, outlining strategies and recommendations to further the state's goal of ensuring reliable, affordable, and environmentally responsible energy sources. The 2021 IEPR covers a broad range of topics, including building decarbonization, energy efficiency, challenges with decarbonizing California's gas system, quantifying the benefits of the Clean Transportation Program, and the California Energy Demand Forecast (CEC 2021).

Senate Bill 100: California Renewables Portfolio Standard Program

SB 100 requires that all California utilities, including independently owned utilities, energy service providers, and community choice aggregators, supply 44 percent of retail sales from renewable resources by December 31, 2024, 50 percent by December 31, 2026, 52 percent by December 31, 2027, and 60 percent by December 31, 2030. The law requires that eligible renewable energy resources and zero-carbon resources supply 100 percent of retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045.

Senate Bill 350: Clean Energy and Pollution Reduction Act of 2015

The Clean Energy and Pollution Reduction Act of 2015 (SB 350) requires doubling of the energy efficiency savings in electricity and natural gas for retail customers through energy efficiency and conservation by December 31, 2030.

Assembly Bill 1007: State Alternative Fuels Plan

AB 1007 (Chapter 371, Statues of 2005) required CEC to prepare a state plan to increase the use of alternative fuels in California. CEC prepared the State Alternative Fuels Plan (SAF Plan) in partnership with CARB and in consultation with other state, federal, and local agencies. The SAF Plan presents strategies and actions California must take to increase the use of alternative non-petroleum fuels in a manner that minimizes the costs to California and maximizes the economic benefits of in-state production. The SAF Plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuel use, reduce greenhouse gas (GHG) emissions, and increase in-state production of biofuels without causing a significant degradation of public health and environmental quality.

California Building Energy Efficiency Standards (Title 24, Part 6)

The energy consumption of new residential and nonresidential buildings in California is regulated by the state's Title 24, Part 6, Building Energy Efficiency Standards (California Energy Code). The California Energy Code was established by CEC in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption, and provide energy efficiency standards for residential and non-residential buildings. CEC updates the California Energy Code every 3 years with more stringent design requirements for reduced energy consumption, which results in the generation of fewer GHG emissions.

The core focus of the building standards has been efficiency, but the 2019 Energy Code ventured into onsite generation by requiring solar PV on new homes, providing significant GHG savings. The most recent is the 2022 California Energy Code, which advances the onsite energy generation progress started in the 2019 California Energy Code, by encouraging electric heat pump technology and use, establishing electric-ready requirements when natural gas is installed, expanding solar photovoltaic (PV) system and battery storage standards, and strengthening ventilation standards to improve indoor air quality.

Statewide GHG Emission Targets and the Climate Change Scoping Plan

Reducing GHG emissions in California has been the focus of the state government for approximately two decades. GHG emission targets established by the state legislature include reducing statewide GHG emissions to 1990 levels by 2020 (Assembly Bill [AB] 32 of 2006) and reducing them to 40 percent below 1990 levels by 2030 (Senate Bill [SB] 32 of 2016). Executive Order S-3-05 calls for statewide GHG emissions to be reduced to 80 percent below 1990 levels by 2050. Executive Order B-55-18 calls for California to achieve carbon neutrality by 2045 and achieve and maintain net negative GHG emissions thereafter. These targets are in line with the scientifically established levels needed in the United States to limit the rise in global temperature to no more than 2 degrees Celsius, the warming threshold at which major climate disruptions, such as super droughts and rising sea levels, are projected; these targets also pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius (United Nations 2015:3).

California's 2017 Climate Change Scoping Plan (2017 Scoping Plan), prepared by the California Air Resources Board (CARB), outlines the main strategies California will implement to achieve the legislated GHG emission target for 2030 and "substantially advance toward our 2050 climate goals" (CARB 2017:1, 3, 5, 20, 25–26). It identifies the reductions needed by each GHG emission sector (e.g., transportation, industry, electricity generation, agriculture, commercial and residential, pollutants with high global warming potential, and recycling and waste).

On September 16, 2022, the state legislature passed AB 1279, which codified stringent emissions targets for the state of achieving carbon neutrality and an 85 percent reduction in 1990 emissions level by 2045. CARB released the Final 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) on November 16, 2022 as also directed by AB 1279. The 2022 Scoping Plan traces the pathway for the state to achieve its carbon neutrality and an 85 percent reduction in 1990 emissions goal by 2045 using a combined top down, bottom up approach using various scenarios. In addition, Appendix D of the 2022 Scoping Plan includes recommended actions for local governments actions to implement through the CEQA and climate action planning process to ensure local actions align with the State's climate goals (CARB 2022a).

The 2022 Scoping Plan focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities (CARB 2022a). CARB adopted the 2022 Scoping Plan on December 16, 2022.

The state has also passed more detailed legislation addressing GHG emissions associated with industrial sources, transportation, electricity generation, and energy consumption, as summarized below.

More details about the statewide GHG reduction goals and 2017 Scoping Plan measures are provided in the regulatory setting of Section 3.7, "Greenhouse Gas Emissions and Climate Change."

Senate Bill 375

SB 375, signed by the Governor in September 2008, aligns regional transportation planning efforts, regional GHG emission reduction targets, and land use and housing allocation. SB 375 requires metropolitan planning organizations (MPOs) to adopt a Sustainable Communities Strategy (SCS) or Alternative Planning Strategy, showing prescribed land use allocation in each MPO's Regional Transportation Plan. CARB, in consultation with the MPOs, is to provide each affected region with reduction targets for GHGs emitted by passenger cars and light trucks in their respective regions for 2020 and 2035. Implementation of SB 375 will have the co-benefit of reducing California's dependency of fossil fuels and making land use development and transportation systems more energy efficient.

Fuel Economy and Electrification Programs and Regulations

As part of its Advanced Clean Cars program, CARB established more stringent GHG emission standards and fuel efficiency standards for fossil fuel–powered on-road vehicles than EPA. In addition, the program's zero-emission vehicle (ZEV) regulation requires battery, fuel cell, and plug-in hybrid electric vehicles to account for up to 15 percent of California's new vehicle sales by 2025. When the rules are fully implemented by 2025, GHG emissions from the statewide fleet of new cars and light-duty trucks will be reduced by 34 percent and cars will emit 75 percent less smog-forming pollution than the statewide fleet in 2016 (CARB 2022b).

Executive Order B-48-18, signed into law in January 2018, requires all State entities to work with the private sector to have at least 5 million ZEVs on the road by 2030, as well as 200 hydrogen fueling stations and 250,000 electric vehicle–charging stations installed by 2025. It specifies that 10,000 of these charging stations must be direct-current fast chargers.

The EPA granted CARB its California's Clean Air Act (CAA) waiver request on December 18, 2024; however, on June 12, 2025, Public Law 119-16, enacting House Joint Resolution 87, was signed into law. The law utilized the Congressional Review Act to disapprove EPA's rule that had granted California a waiver to enforce stricter emissions standards under its Advanced Clean Cars program. California has appealed the decisions. The implications of this law on the State's ability to enforce its independent fuel economy standards are uncertain at this time. However, it is worth noting that the herein is based on emission factors from EMFAC2021, and because Advanced Clean Cars had not yet been adopted at the time the EMFAC2021 methodologies were last updated, the analysis does not account for emission reductions associated with Advanced Clean Cars.

LOCAL

Lassen County General Plan

The County's General Plan was adopted in 1999 and contains the following policies related to energy in the Natural Resources Element that are applicable to the project.

- **NR61 Policy:** The County advocates and encourages Federal and state agencies to conduct or help fund resource assessments· and other studies to evaluate the availability of energy resources, and to facilitate efficient and well-designed projects which can capitalize on those resources with acceptable levels of environmental impact and compatibility with other land uses and resource values.
- **NR62 Policy:** In the course of adopting policies pertaining to energy resources in other County planning elements and area plans, the County may consider additional and more specific policies and measures to manage those resources.
- **NR63 Policy:** The Energy Element of the Lassen County General Plan shall provide specific policies and measures pertaining to the conservation and management of energy resources, as well as the siting and development standards of projects proposing to utilize those resources.

Susanville General Plan

Susanville's General Plan was adopted in 1991 and the City is in the process of updating the various elements of the General Plan. As of mid-2025, the City has adopted updates to the Land Use, Circulation, and Housing Elements, and plans to update the remaining elements. Because the City has not completed the update to Community Health, Safety, and Conservation Element, this analysis relies on the current version of that element, adopted in 1991, which contains the following policy related to energy that is applicable to the project.

- **Policy h.** The City shall undertake practices to improve Susanville's air quality, including reducing the emission of particulate matter from wood fires in stoves and fireplaces.
    - **Action program [12]:** Encourage all new construction to include geothermal heating or active or passive solar heating, and educate developers and homeowners regarding the availability and advantages of alternative heating sources.

3.5.2 Environmental Setting

PHYSICAL SETTING

Energy Facilities and Services in the Project Area

Lassen Municipal Utility District (LMUD) provides electricity and natural gas to the City. Other parts of unincorporated Lassen County near Susanville are also serviced by the Plumas-Sierra Rural Electric Cooperative. Utility tie-ins for water and gas are located at the Skyline Road/Johnstonville Road intersection and sewer at the Riverside Drive/SR 36 intersection. Existing overhead electrical lines are located along Skyline Road and adjacent to SR 36.

Energy Types and Sources

California relies on a regional power system composed of a diverse mix of natural gas, renewable, hydroelectric, and nuclear generation resources. Natural gas makes up one-third of energy commodities consumed in California. In 2022, approximately 36 percent of natural gas consumed in the State was used to generate electricity. Large hydroelectric powered approximately 9 percent of electricity and renewable energy from solar, wind, small hydroelectric, geothermal, and biomass combustion totaled 36 percent (PG&E 2023).

Alternative Fuels

A variety of alternative fuels are used to reduce demand for petroleum-based fuel. The use of these fuels is encouraged through various statewide regulations and plans (e.g., Low Carbon Fuel Standard, AB 32 Scoping Plan). Conventional gasoline and diesel may be replaced (depending on the capability of the vehicle) with many transportation fuels, including:

- biodiesel,
- electricity,
- ethanol (E-10 and E-85),
- hydrogen,
- natural gas (methane in the form of compressed and liquefied natural gas),
- propane,
- renewable diesel (including biomass-to-liquid),
- synthetic fuels, and
- gas-to-liquid and coal-to-liquid fuels.

California has a growing number of alternative fuel vehicles through the joint efforts of CEC, CARB, local air districts, federal government, transit agencies, utilities, and other public and private entities. As of October 2024, California contained nearly 18,000 alternative fueling stations (AFDC 2024).

ENERGY USE FOR TRANSPORTATION

In 2022, the transportation sector comprised the largest end-use sector of energy in the state, 42.6 percent, followed by the industrial sector totaling 22.5 percent, the residential sector at 17.6 percent, and the commercial sector at 17.4 percent (EIA 2024). On-road vehicles use about 85 percent of the petroleum consumed in California. CEC reported retail sales of 6 million and 2 million gallons of gasoline and diesel, respectively, in Lassen County in 2023 (the most recent data available) (CEC 2024).

FUEL PRODUCTION

In 2024, 13.4 billion gallons of gasoline and 3.5 billion gallons of diesel (including offroad diesel) were sold in California (CEC 2025a, CEC 2025b). The transportation sector uses about 86 percent of the petroleum consumed in the state. California is the eighth-largest crude oil producer among the US, and includes 9 percent of the nation's total crude oil refining capacity, ranking it third in the US behind only Texas and Louisiana. A network of pipelines connects California crude oil production to the state's 14 operating petroleum refineries, which are located primarily in the Los Angeles area, the San Francisco Bay area, and the San Joaquin Valley. California refineries produce cleaner fuels in order to meet state environmental regulations (EIA 2025).

ENERGY USE AND CLIMATE CHANGE

Scientists and climatologists have produced evidence that the burning of fossil fuels by vehicles, power plants, industrial facilities, residences, and commercial facilities has led to an increase of the earth's temperature. For an analysis of greenhouse gas production and the project's impacts on climate change, refer to Section 3.7, "Greenhouse Gas Emissions and Climate Change."

3.5.3 Impacts and Mitigation Measures

METHODOLOGY

Levels of construction- and operation-related energy consumption by the project are measured in megawatt-hours of electricity, therms of natural gas, gallons of gasoline, and gallons of diesel fuel. Energy consumption estimates were calculated using the California Emissions Estimator Model (CalEEMod) version 2022.1.1.29 computer program. Where project-specific information was not known, CalEEMod default values based on the project's location were used and rely on the same modeling used for Air Quality (Section 3.2) and GHGs and Climate Change (Section 3.7). Table 3.5-1 summarizes the levels of energy consumption for each year of construction and Table 3.5-2 summarizes the levels of energy consumption for the first year of operation during the buildout year of 2027. Table 3.5-3 summarizes the gasoline and diesel consumption estimated for the project.

THRESHOLDS OF SIGNIFICANCE

Appendix G of the CEQA Guidelines, which is a sample Initial Study checklist, includes inquiries regarding the energy-related impacts of proposed projects. A separate appendix, Appendix F, is specifically devoted to energy conservation. After stating that "[t]he goal of conserving energy implies the wise and efficient use of energy," Appendix F states that "[t]he means of achieving this goal include: (1) decreasing overall per capita energy consumption, (2) decreasing reliance on fossil fuels such as coal, natural gas and oil, and (3) increasing reliance on renewable energy sources."

It is a common practice for lead agencies to use the inquiries found in Appendix G for purposes of fashioning significance thresholds. Here, the City, in its discretion, has done so, but has done so keeping in mind the policy statements and recommendations found in Appendix F. Thus, the proposed project would have a potentially significant adverse impact if the project would:

- result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation; and/or
- conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

ISSUES NOT DISCUSSED FURTHER

Conflict With or Obstruct a State or Local Plan for Renewable Energy or Energy Efficiency

The project is designed in a manner that is consistent with and not in conflict with relevant energy conservation plans that are intended to encourage development that results in the efficient use of energy resources. Although implementation of the project has the potential to result in the overall increase in consumption of energy resources during construction and operation of new buildings and facilities, energy consumption would be minor and would not result in wasteful, inefficient, or unnecessary consumption of energy because the project would adhere to current building code requirements. The project would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the Title 24 standards and CALGreen Code. The project's energy-efficient features would include, but would not be limited to, water-efficient landscape design, high-efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; EV charging station parking spaces; bicycle facilities that would meet or exceed the CALGreen or City codes (whichever is greater); Energy Star–labeled appliances, where possible; and energy-efficient and water conserving HVAC systems. The Project also includes an estimated 51,000 kWh/year solar Photovoltaic (PV) installation. Although the City of Susanville General Plan, which would be the operative document if the project is approved by the City and the annexation is approved by LAFCO, does not contain energy-efficiency policies, the project would also be consistent with and not conflict with regional or local planning strategies that address energy conservation, such as the Lassen County Energy and Natural Resources Elements.

With respect to operational transportation-related fuel usage, the project would not conflict with statewide efforts to improve transportation energy efficiency and reduce transportation energy consumption with respect to light-, medium-, and heavy-duty vehicles, trucks, and RVs. Additionally, the project would not significantly increase fuel energy consumption in the area. There are nine existing gasoline dispensing facilities within two miles of the project site, and the primary trip generation of the project is pass by trips. As such, the project is unlikely to significantly induce transportation energy consumption. The project would also benefit from fuel and automotive manufacturers' compliance with CAFE fuel economy standards and the Pavley Standards, which are designed to result in more efficient use of transportation fuels. The project's design would comply with existing energy standards and incorporate features to reduce energy consumption, including the features discussed above. Therefore, the project would not conflict with energy conservation plans and impacts would be **less than significant**.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 3.5-1: Wasteful, Inefficient, or Unnecessary Consumption of Energy, During Project Construction or Operation

Construction and operation of buildings and facilities associated with the project would result in consumption of fuel (gasoline and diesel), electricity, and natural gas. Energy consumption associated with construction would be temporary and would not require additional capacity or substantially increase peak or base period demands for electricity or other forms of energy. Through adherence to and exceedance of current building code requirements, energy consumption associated with operation of the buildings and facilities would not result in wasteful, inefficient, or unnecessary consumption of energy. This impact would be **less than significant**.

Appendix G of the State CEQA Guidelines requires consideration of the energy implications of a project. CEQA requires mitigation measures to reduce "wasteful, inefficient, and unnecessary energy usage" (PRC Section 21100[b][3]). As noted above, Appendix F of the State CEQA Guidelines provides guidance on analyzing a project's energy use. It states, "[t]he goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include: [¶] (1) decreasing overall per capita energy consumption, [¶] (2) decreasing reliance on fossil fuels such as coal, natural gas and oil, and [¶] (3) increasing reliance on renewable energy sources." (Guidelines, Appendix F.) Appendix F includes considerations for potential energy impacts, including a project's energy requirements and energy use efficiencies, the project's effect on local and regional energy supplies, requirements for

additional capacity, and peak and base period demands for energy, the project's compliance with existing energy standards, the project's effect on energy resources, and the project's transportation energy use and its use of efficient transportation alternatives. Compliance with the California Energy Code would result in energy-efficient buildings. However, compliance with the California Energy Code does not address all potential energy impacts during construction and operation of the project. Energy use is discussed by project component below.

Construction-Related Energy

Energy would be required for demolition and construction activities associated with the project. Construction-related energy use would be in the form of fuel (gasoline and diesel) required to operate and maintain construction equipment and transport construction materials. The one-time energy expenditure required to construct buildings and facilities, as well as frontage and off site improvements would be nonrecoverable. Most energy consumption would result from the use of construction equipment and vehicle trips associated with commutes by construction workers and haul trucks carrying supplies. The modeled level of energy consumption associated with construction of both the travel center and the RV park and associated utility improvements would be 1,781 gallons of gasoline and 1,433 gallons of diesel fuel from on-road vehicles and 821 gallons of gasoline from off-road vehicles such as construction equipment. Details about construction phasing assumptions applied to CalEEMod can be found in Appendix C.

Table 3.5-1 shows the amount of gasoline and diesel consumption associated with project construction by construction phase.

Table 3.5-1 Construction Energy Consumption

Phase	On-road Vehicles		Off-road Vehicles
	Diesel (Gallons)	Gasoline (Gallons)	Diesel (Gallons)
Demolition	158	248	135
Site Preparation	169	<1	219
Grading	202	<1	273
Building Construction	629	520	108
Paving	151	1,012	66
Offsite Improvements	25	<1	16
Architectural Coating	25	<1	3
Total	**1,433**	**1,781**	**821**

Notes: Gasoline gallons include on-road gallons from worker trips. Diesel gallons include off-road equipment and on-road haul trucks and vendor trips.

See Appendix C for detailed input parameters and modeling results.

Source: Calculations by Ascent in 2025.

The energy needs for construction would be spread throughout the project area and over the course of the construction duration. Although construction activities would require fuel and other energy sources, the energy needs for construction would be temporary and would not substantially increase energy demand in a wasteful or inefficient manner. There would be no atypical construction-related energy demand associated with the development, because construction would follow standard practices related to energy consumption. Although construction companies are increasingly adopting alternative power sources like biodiesel, compressed natural gas (CNG), and electric powertrains to reduce emissions, due to the rural nature of Susanville, alternative fuels, electric vehicles and EV charging stations are not readily available, or not practical for use in construction (Los Angeles Times 2023). Certain fuel supplier companies in Susanville do have biodiesel available; however, it is undetermined whether construction vehicles that can run on biodiesel are available in the project vicinity. Regardless, nonrenewable energy would not be consumed in a wasteful, inefficient, or unnecessary manner when compared to other construction activity in the region. In addition, on-road gasoline and diesel fuel consumption associated with construction activity would decrease every year, as the vehicle fleet becomes more fuel-efficient over time. There is no basis to conclude

that construction would be wasteful of fuel or other energy resources; only the necessary amount of fuel would be consumed to complete construction of the proposed project.

Building Energy

Operation of project buildings would be typical regarding use of electricity for lighting, space and water heating, appliances, and landscape maintenance activities. Indirect energy use would include water and wastewater treatment and conveyance and solid waste removal. Implementation of the project would increase electricity consumption in the region relative to existing conditions. However, the increase would be negligible relative to the existing electricity consumption of the region. The project would limit natural gas combustion to only the commercial kitchens on site. Table 3.5-2 summarizes estimated operational energy needs on an annual basis.

All new buildings proposed would be constructed in accordance with the most recent building code (i.e., California Building Code) at the time of construction, which includes energy and lighting efficiency. As discussed above, to ensure that no wasteful, inefficient, or unnecessary consumption of energy would occur during project operations, the project's building energy-efficient features would include, but would not be limited to, water-efficient landscape design, high-efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; EV charging station parking spaces; bicycle facilities that would meet or exceed the CALGreen or City codes (whichever is greater); Energy Star–labeled appliances, where possible; and energy-efficient and water conserving HVAC systems. The Project also includes an estimated 51,000 kWh/year solar PV system that would offset some of the operational electricity use.

It should also be noted that the estimated energy use is conservative because it does not reflect the anticipated increase in building energy efficiency that technological advances will provide over time. Building electricity and natural gas consumption are based on CalEEMod defaults, which do not take into account recent updates to California Building Code (e.g., 2022 Title 24), which will result in lower actual energy demand than estimated herein.

Table 3.5-2 Operational Energy Consumption

Land Use/Energy Type	Electricity Consumption (MWh/year)	Natural Gas (kBtu/year)
Convenience Store	540	0
Gasoline Station	54	0
Fast-Food Counter	158	449,149
Fast-Food Restaurant (with drive-through)	72	205,311
Dog Park	0	0
Parking Areas	291	0
RV Parking	108	0
Total	1,223	654,460

Notes: MWh/year = megawatt-hours per year; MMBtu/year = metric million British thermal units per year. Natural gas consumption is limited to commercial kitchens in fast food uses.

See Appendix C for detailed input parameters and modeling results.

Source: Calculations by Ascent in 2025.

Transportation Energy

Transportation-related fuel consumption was assessed using the daily VMT estimates from the transportation analysis (Section, 3.9, "Transportation," and Appendix I) and estimated miles per gallon per fuel type for Lassen County from the CARB mobile source emissions inventory EMFAC database. Accordingly, the project is estimated to result in the combustion of 158,285 gallons per year of gasoline and 29,586 gallons of diesel per year (see Appendix C). As stated below, the project will serve existing automobile and truck traffic on SR-36. While fuel consumption from this existing traffic is assigned to the project to determine its potential transportation energy impacts, it is important to note that the project would not significantly induce new fuel consumption. Existing traffic on SR-36 would consume fuel with or without the Project, and the project would construct a travel stop near a major highway to minimize truck and

automobile movements. State and federal regulations regarding fuel efficiency standards for vehicles in California are designed to reduce wasteful, inefficient and unnecessary use of energy for transportation. Additionally, the project supports the State's renewable energy and alternative transportation goals by providing three EV charging stations, as well as bicycle facilities.

The project is proposed adjacent to SR-36 and would serve existing vehicular/truck traffic. The proximity of the project to an existing major regional roadway would minimize travel distances, and associated fuel consumption, for vehicles using the project site. Although a slight increase in VMT would occur associated with pass-by trips and new trips generated by the RV park uses, locating these uses adjacent to SR-36 would minimize increases in VMT. Table 3.5-3 summarizes the estimated energy consumption by vehicle category on an annual basis at operation.

Table 3.5-3 Operational Transportation Energy Consumption

Vehicle Category	Gasoline (gal/year)	Diesel (gal/year)
Passenger Vehicles	26,685	117
Trucks	50,881	9,953
Other Vehicles	80,719	19,516
Total (All Vehicle Types)	**158,285**	**29,586**

Notes: gal/year = gallons per year.

Source: Calculations by Ascent in 2024.

Summary

The project would increase energy demand during temporary construction activities for new buildings and facilities. Construction activities would not increase long-term, ongoing demand for energy or fuel because project construction is anticipated to last 12 months and would be temporary.

Over time, the project's operational energy use would come from increasingly renewable sources according to California's renewable energy goals (see SB 100 description in Section 3.5.1).

All project buildings would meet the Title 24 building efficiency standards in effect at the time of construction. In addition, design features are included in the project that would improve energy efficiency and increase the use of renewable energy. Lastly, while the project would result in transportation energy consumption, it is intended to service existing traffic on SR-36 and would not significantly induce new fuel consumption. Additionally, the project supports the State's renewable energy and alternative transportation goals by incorporating solar PV and providing EV charging stations and bicycle facilities. For these reasons, implementation of the proposed project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources during construction or operations. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

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3.6 GEOLOGY AND SOILS

This section describes current conditions related to geology and soils at the project site, specifically pertaining to paleontological resources. It describes the existing geological and paleontological setting, analyzes environmental impacts, and identifies mitigation measures to address potentially significant impacts. The primary sources of information used for this analysis are the Geological Investigation Report produced by Reno Tahoe Geo Associates, Inc (provided as an appendix within Appendix A) and Paleontological Resource Assessment Memorandum prepared for the project by Sub-Terra Heritage Resource Investigations (provided in Appendix F of this Draft EIR).

As discussed under "Issues Not Discussed Further" in Section 3.6.3, "Environmental Impacts and Mitigation Measures," the project would not result in significant effects related to earthquake fault rupture, strong seismic shaking, seismic-related ground failure, landslides, soil erosion and loss of topsoil, unstable geological units and soil, expansive soils, soils incapable of supporting septic tanks or alternative wastewater disposal systems, and mineral resources. Therefore, these topics were dismissed from detailed review in this EIR.

No comments in response to the NOP were received that identified concerns regarding geological or paleontological resources.

3.6.1 Regulatory Setting

FEDERAL

No federal plans, policies, regulations, or laws related to geology and soils are applicable to the project.

STATE

California Environmental Quality Act

The California Environmental Quality Act (CEQA), codified at Public Resources Code [PRC] Section 21000 et seq., is the principal statute governing environmental review of projects occurring in the State. CEQA requires lead agencies to determine whether a proposed project would have a significant effect on the environment, including paleontological resources. The State CEQA Guidelines (California Code of Regulations Title 14, Chapter 3, Section 15000 et seq.) defines procedures, types of activities, persons, and public agencies required to comply with CEQA. Appendix G of the State CEQA Guidelines specifically asks whether a project would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Public Resources Code (Sections 5097.5 and 30244)

PRC Section 5097.5 provides protection for paleontological resources on public lands, where Section 5097.5(a) states, in part, that:

> No person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, paleontological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other paleontological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.

PRC Section 30244 requires reasonable mitigation measures when development would adversely impact archaeological or paleontological resources, as identified by the State Historic Preservation Officer.

California Penal Code (Section 622.5)

California Penal Code Section 622.5 provides the following: "Every person, not the owner thereof, who willfully injures, disfigures, defaces, or destroys any object or thing of archeological or historical interest or value, whether situated on private lands or within any public park or place, is guilty of a misdemeanor."

LOCAL

Lassen County

Lassen County General Plan

The 2000 Lassen County General Plan (Lassen County 1999) and subsequent updates do not contain any goals or policies related to paleontological resources that are relevant to the project.

Lassen County Code of Ordinances

The Lassen County Code of Ordinances does not contain any laws or ordinances related to paleontological resources that are relevant to the project.

City of Susanville

City of Susanville General Plan

Susanville's General Plan was adopted in 1991 and the City is in the process of updating the various elements of the General Plan. As of mid-2025, the City has adopted updates to the Land Use, Circulation, and Housing Elements, and plans to update the remaining elements. The Susanville General Plan 1990-2010 does not contain any goals or policies related to paleontological resources that are relevant to the project (City of Susanville 2006).

Susanville Vicinity Area Plan

The Susanville Vicinity Area Plan (December 1984) does not contain any goals or policies related to paleontological resources that are relevant to the project (Lassen County 1984).

Susanville Municipal Code

The Susanville Municipal Code does not contain any laws or ordinances related to paleontological resources that are relevant to the project.

3.6.2 Environmental Setting

The information in this section is based on the Geological Investigation Report produced by Reno Tahoe Geo Associates, Inc (provided as an appendix within Appendix A) and the Paleontological Resource Assessment Memorandum prepared for the project by Sub-Terra Heritage Resource Investigations (provided in Appendix F of this Draft EIR). Research conducted during preparation of the Paleontological Resource Assessment Memorandum included reviews of geologic maps, scientific literature, and University of California Museum of Paleontology (UCMP) records.

DEFINITIONS

Paleontology is a multidisciplinary science that combines elements of geology, biology, chemistry, and physics to understand the history of life on earth. Fossils are the remains, imprints, or traces of once-living organisms preserved in rocks and sediments. These include mineralized, partially mineralized, or un-mineralized bones and teeth, soft tissues, shells, wood, leaf impressions, footprints, burrows, and microscopic remains. Paleontological resources include not only fossils themselves, but also the associated rocks or organic matter and the physical characteristics of the fossils' associated sedimentary matrix.

The fossil record is the only evidence that life on earth has existed for more than 3.6 billion years. Fossils are considered non-renewable resources because the organisms they represent no longer exist (Scott and Springer 2003, cited in Sub-Terra Heritage Resource Investigations 2025). Thus, once destroyed, a fossil can never be replaced (Murphey and Daitch 2007). Fossils are important scientific and educational resources and can be used to:

- study phylogenetic relationships amongst extinct organisms, as well as their relationships to modern groups;
- elucidate the taphonomic, behavioral, temporal, and diagenetic pathways responsible for fossil preservation, including the biases inherent in the fossil record;
- reconstruct ancient environments, climate change, and paleoecological relationships;
- provide a measure of relative geologic dating which forms the basis for biochronology and biostratigraphy, and which is an independent and corroborating line of evidence for isotopic dating;
- study the geographic distribution of organisms and tectonic movements of land masses and ocean basins through time;
- study patterns and processes of evolution, extinction, and speciation; and
- identify past and potential future human-caused effects to global environments and climates (Murphey and Daitch 2007).

The Society of Vertebrate Paleontology (SVP) defines significant paleontological resources as "fossils and fossiliferous deposits, here defined as consisting of identifiable vertebrate fossils, large or small, uncommon invertebrate, plant, and trace fossils, and other data that provide taphonomic, taxonomic, phylogenetic, paleoecologic, stratigraphic, and/or biochronologic information. Paleontological resources are considered to be older than recorded human history and/or older than middle Holocene (i.e., older than about 5,000 radiocarbon years)" (SVP 2010).

The SVP defines significant fossiliferous deposits as "a rock unit or formation which contains significant nonrenewable paleontological resources, here defined as comprising one or more identifiable vertebrate fossils, large or small, and any associated invertebrate and plant fossils, traces, and other data that provide taphonomic, taxonomic, phylogenetic, ecologic, and stratigraphic information (ichnites and trace fossils generated by vertebrate animals, e.g., trackways, or nests and middens which provide datable material and climatic information)" (SVP 1995).

Based on the definitions of the SVP, all identifiable vertebrate fossils are considered to have significant scientific value. This position is adhered to because vertebrate fossils are relatively uncommon, and only rarely will a fossil locality yield a statistically significant number of specimens of the same genus. Therefore, every vertebrate fossil found has the potential to provide significant new information on the taxon it represents, its paleoenvironment, and/or its distribution. Furthermore, all geologic units in which vertebrate fossils have previously been found are considered to have high sensitivity. Identifiable plant and invertebrate fossils are considered significant if found in association with vertebrate fossils or if defined as significant by project paleontologists, specialists, or local government agencies.

A geologic unit known to contain significant fossils is considered "sensitive" to adverse impacts if there is a high probability that earth-moving or ground-disturbing activities in that rock unit will either disturb or destroy fossil remains directly or indirectly. This definition of sensitivity differs fundamentally from the definition for archaeological resources because the boundaries of archaeological sites define the areal extent of the resource. However, paleontological sites, encompass the containing sedimentary rock unit or formation is fossiliferous. The limits of the entire rock formation, both areal and stratigraphic, therefore define the scope of the paleontological potential in each case (SVP 1995).

Fossils are contained within surficial sediments or bedrock, and paleontologists cannot know either the quality or quantity of fossils prior to natural erosion or human-caused exposure. As a result, even in the absence of surface fossils it is necessary to assess the sensitivity of rock units based on their known potential to produce significant fossils elsewhere within the same geologic unit (both within and outside the study area), a similar geologic unit, or based on whether the unit in question was deposited in a type of environment that is known to be favorable for fossil preservation.

GEOLOGICAL SETTING

The City of Susanville is in the Honey Lake Valley, a drainage basin near the northwestern terminus of the Basin and Range Province. The bounding mountain ranges are dominated by Miocene to Pleistocene intermediate (andesitic) to mafic (basaltic) lava flows that covered older Paleozoic and Mesozoic rocks that were intruded by Mesozoic granitoids (Clynne et al. 2017; Grose 2000, cited in Sub-Terra Heritage Resource Investigations 2025). The valley floor itself records expansion and then retreat of Lake Lahontan, a major Pleistocene pluvial lake that was located over northeastern California and northwestern Nevada. Belts of facies (i.e., bodies of rock with distinctive characteristics), from the shoreline to lake centers, encircle the ancient lake. Honey Lake, southeast of the project site, is a remnant of this once vast lake. During the Holocene, as Lake Lahontan dried up, valleys were carved across the vast plain and have been infilling with recent alluvium.

SITE-SPECIFIC GEOLOGY AND PALEONTOLOGY

The project site is on the valley floor north of Honey Lake. While outcrops of Miocene, Pliocene, and Pleistocene volcanic flows occur near the project area, it is unlikely that these units would occur shallowly below the valley floor. The project site encompasses the contact between Pleistocene lake deposits (Ql) and younger alluvium (Q). The lake shoreline appears northwest of the project site in Susanville as a mappable region of coarser gravels and sands (Qlg). Higher ridges of Miocene to Pliocene andesitic flows (Thma, Tbmb) are southwest of the project site and Pleistocene basalt (Qsb) are northeast and southwest of the project site.

PALEONTOLOGICAL RECORDS SEARCH RESULTS

The records search from the University of California Museum of Paleontology (UCMP) yielded several localities near the project site. UCMP V79031 is located approximately two miles northeast of the project site and yielded a rare Pleistocene pika jaw. The fossil was collected from beds mapped as Quaternary lacustrine (Ql).

An additional search of the online holdings of the UCMP in April 2025 yielded 585 records from the Pleistocene of Lassen County. The records indicate preservation of diverse Ice Age animals in the region. The database includes 29 unique field localities, consisting primarily of fish fossils (429 records), followed by mammals (122), and more rare invertebrates (28), reptiles (4), and birds (2). The mammals include bison, horses, camelids, and mammoths.

LITERATURE SEARCH RESULTS

A search of the American Geological Institute database did not yield any additional fossils from the Pleistocene of Lassen County. However, projects completed in the Lahontan Lake sediments south of the City of Susanville on federally managed properties have yielded diverse terrestrial mammals and bird fossils.

PALEONTOLOGICAL SENSITIVITY OF THE PROJECT SITE AND OFFSITE AREAS

Geologic units (bedrock formations) are assigned a sensitivity ranking based on the results of prior and present paleontological work. The ranking accounts for the known taxonomic diversity and abundance of previously recorded, scientifically significant fossil occurrences and the potential for future discoveries, as determined by a review of the relevant scientific literature.

As a result of the literature analysis and UCMP records, the Quaternary lake deposits of Lake Lahontan have high sensitivity for paleontological resources. There is sufficient evidence to show that the facies and age have a strong potential to preserve scientifically significant fossils. The Quaternary Alluvium is too young by the standards of both the SVP (2010) and federal agencies to host paleontological resources, thus has low sensitivity. However, the alluvium fills channels that were carved into the lake deposits may increase to high sensitivity at depth.

3.6.3 Environmental Impacts and Mitigation Measures

METHODOLOGY

This impact evaluation is based on the results of the Paleontological Resource Assessment Memorandum prepared for the project by Sub-Terra Heritage Resource Investigations (provided in Appendix F of this Draft EIR). Research conducted during preparation of the memorandum was used to identify previously recorded fossil localities in the project area and evaluate the paleontological sensitivity of the project area.

THRESHOLDS OF SIGNIFICANCE

Appendix G of the CEQA Guidelines, which is a sample Initial Study checklist, includes inquiries regarding the impacts of proposed projects related to geology and soils. It is a common practice for lead agencies to use the inquiries found in Appendix G for purposes of fashioning significance thresholds. Here, the City, in its discretion, has done so. Thus, the proposed project would result in a significant impact if the project would do any of the following:

- directly or indirectly expose people or structures to potential substantial adverse impacts, including the risk of loss, injury, or death through the rupture of a known earthquake fault, strong seismic shaking, seismic-related ground failure, soil liquefaction, or landslides;
- result in substantial soil erosion or the loss of topsoil;
- 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, liquefaction, or collapse;
- be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994, as updated), creating substantial direct or indirect risks to life or property;
- have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater;
- have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater; or
- directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

The impact analysis in this section (3.6) takes account of the California Supreme Court's decision in *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, 377-378, in which the court held that "agencies subject to CEQA generally are not required to analyze how existing environmental conditions will impact a project's future users or residents. But when a proposed project risks exacerbating those environmental hazards or conditions that already exist, an agency must analyze the potential impact of such hazards on future residents or users. In those specific instances, it is the project's impact on the environment—and not the environment's impact on the project—that compels an evaluation of how future residents or users could be affected by exacerbated conditions."

Under this precedent, CEQA does not consider the impact of the environment on a project (such as the impact of existing seismic ground shaking hazards on new project receptors) to be an impact requiring consideration under CEQA. Rather, CEQA is only concerned with the extent to which, if any, a proposed project would exacerbate an existing environmental hazard. Existing hazards are considered to be part of baseline conditions.

ISSUES NOT DISCUSSED FURTHER

Earthquake Fault Rupture

The project site does not lie within a designated Alquist Priolo Earthquake Fault Zone. However, there is potential for surface ground rupture to occur at the project site because of potentially active faults nearby. Nonetheless, the project would be designed with earthquake structural design components required by the California Building Code (CBC) to protect against significant cosmetic damage and serious economic loss, which in turn, would help protect the health and safety of humans who may be in or near the building. Therefore, the project would not directly or indirectly expose people or structures to potential substantial adverse impacts, including the risk of loss, injury, or death through the rupture of a known earthquake fault. This topic is not discussed further.

Strong Seismic Shaking

The project site lies within an area with a high potential for strong earthquake shaking from large earthquakes in western Nevada and eastern California. The maximum possible earthquake in this area that could occur locally would be in the range of magnitude 7.0 to 8.0 along the Honey Lake Fault Zone with an epicenter located approximately 20 miles southeast of the site.

The project includes the construction of new elements that could experience moderate to high ground motion from local or regional faults. Although some structural damage is typically not avoidable during a large earthquake, the project would be designed to meet existing construction ordinances and the most recent CBC to protect against building collapse and major injury during a seismic event. The CBC includes specific design measures, which are based on the determination of Site Classification and Seismic Design Categories specific to the project site. These design measures would maximize structural stability in the event of an earthquake. Furthermore, the project would comply with California Geological Survey Special Publication 117A, *Guidelines for Evaluating and Mitigating Seismic Hazards in California* (CGS 2008), which provides guidance for evaluation and mitigation of earthquake-related hazards.

In addition, the applicant would prepare a final design-level geotechnical report based on the final construction and building plans, which would be subject to City approval and require compliance with the CBC and CGS Publication 117A prior to issuance of building permits. Implementation of the site-specific structural and seismic design parameters and recommendations for foundations of the final design-level geotechnical report would further ensure that seismic-related ground shaking impacts would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death. This topic is not discussed further.

Seismic-Related Ground Failure, Including Liquefaction

The liquefaction analysis conducted as part of the Geotechnical Investigation Report (provided in Appendix A of this Draft EIR) noted that because the site subsurface sandy soils are unsaturated to 18 to 20 feet depth, and soils below 15 feet depth to 35 feet depth are primarily medium- to high-plasticity clays, the potential for liquefaction is minor to negligible. Therefore, the project would not directly or indirectly expose people or structures to potential substantial adverse impacts, including the risk of loss, injury, or death from seismic-related ground failure, including liquefaction. This topic is not discussed further.

Landslides

The geologic and topographic characteristics of an area often determine its potential for landslides. Landslides (or slope failure) refer to the dislodging and falling of a mass of soil or rocks along a sloped surface. Although the potential for small-scale slope failure may exist particularly along stream banks, margins of drainage channels, and similar settings where steep banks or slopes occur, the flat terrain of the project site minimizes this potential geologic hazard. Given the project site's topography, impacts from seismically induced landslides would not occur. This topic is not discussed further.

Soil Erosion and Loss of Topsoil

Construction activities would require grading, excavation, and other construction activities that have the potential to disturb existing soils within the project site and expose these soils to rainfall or wind during construction, thus having the potential for soil erosion. Standard erosion controls would be imposed during site preparation and grading activities. Soil erosion via wind would be minimized through soil stabilization measures required by Lassen County Air Pollution Control District Rule 4:18 – Fugitive Dust Emissions, such as applying asphalt, oil, water or suitable chemicals to dirt roads, material stockpiles, land clearing, excavation, grading, or other surfaces which can give rise to airborne dusts. Potential for water erosion would be reduced by implementation of construction industry standard erosion control measures imposed during site preparation and grading activities. Construction activities would be conducted in accordance with applicable standard erosion control practices required pursuant to the CBC and the requirements of the National Pollutant Discharge Elimination System General Construction Permit issued by the Lahontan Regional Water Quality Control Board, as applicable. Consistent with these requirements, due to project construction activities resulting in one acre or more of land disturbance, a Stormwater Pollution Prevention Plan (SWPPP) would be prepared that incorporates BMPs to control erosion during the project's construction period. Any BMPs included as part of the SWPPP would thus be implemented as part of the project. Following project construction, the project site would be covered completely by paving, structures, and landscaping, which would minimize the potential for soil erosion. Therefore, the project would not result in substantial soil erosion or the loss of topsoil. This topic is not discussed further.

Unstable Geological Units and Soil

Lateral Spreading

The project site is not located within a liquefaction hazard zone and therefore, there is limited potential for lateral spreading to occur at the project site. Based on the liquefaction analysis conducted as part of the Geotechnical Investigation Report, discussed under "Landslides," above, the potential for liquefaction on the project site is unlikely. Additionally, the project would be built subject to the seismic design criteria of the most recent CBC. The CBC includes provisions that would reduce lateral spreading impacts onsite. This topic is not discussed further.

Subsidence/Collapse

Subsidence or collapse is the sinking of the ground surface caused by the compression of earth materials resulting from human activities, such as groundwater or oil and gas withdrawal. The resulting compression typically occurs only once within affected soils and cannot be repeated during fluctuations of the groundwater level or from peat oxidation.

Based on borehole drilling undertaken at the site as part of the Geotechnical Investigation Report, near surface deposits are composed primarily of 5 to 15 feet of medium- to high-plasticity clays and silts with lesser layers of interbedded silty sand and sand/silt. Between 15 feet depth and 30 to 35 feet depth, the soil consisted of lightly-overconsolidated soft to firm fat clay. This material has high water contents and low strength and will be subject to consolidation settlements under additional site loads. Options to limit settlement on the project site would include limiting the thickness of fill placed for construction. It is assumed that a lightly loaded single-story building would have distributed loading of the deeper soil layers that is equivalent to placement of one foot of fill. Buried structures and tanks would theoretically decrease the weight of existing fill and soil and would not increase the predicted settlement. The high mast sign is also assumed to have loads that are distributed over considerable width and would not increase settlement potential.

The Geotechnical Investigation Report recommended the method of foundation support for the single-story structure, canopy structures, buried tank, environmental or fuel vaults (assumed to not exceed 8 to 10 feet depth), and the high-rise sign would be spread footings. Additionally, the project would be constructed in conformance with the most recently adopted CBC, which includes provisions to reduce subsidence and collapse impacts, and applicable recommendations made in the Geotechnical Investigation Report prepared for the project. This topic is not discussed further.

Liquefaction

Liquefaction is a phenomenon that occurs when soil undergoes transformation from a solid state to a liquefied condition from increased pore-water pressure. This typically occurs where susceptible soils (particularly soils in the medium sand to silt range) are located over a high groundwater table. Because the site subsurface sandy soils are unsaturated to 18 to 20 feet depth, and soils below 15 feet depth to 35 feet depth are primarily medium- to high-plasticity clays, the potential for liquefaction is minor to negligible. However, to ensure that the project would not experience structural damage due to liquefaction, the project would be designed and constructed in conformance with the most recently adopted CBC. This topic is not discussed further.

Expansive Soils

The Geotechnical Investigation Report prepared for the project determined that expansive clays would require separation from footings and pavements by at least 2 feet of compacted granular fill, including the thickness of aggregate base and subbase layers (Appendix A). The project would be designed and constructed in conformance with the most recently adopted CBC to ensure that the proposed development would not experience structural damage due to expansive soil. Compliance with the CBC would ensure that the project would not create substantial direct or indirect risks to life or property from expansive soils. This topic is not discussed further.

Soils Incapable of Supporting Septic Tanks or Alternative Wastewater Disposal Systems

The project site is located on the outskirts of an urbanized area where municipal wastewater infrastructure already exists, although the project would need to install connections to the sewer. The project would not include the use of any septic tanks; additional wastewater output would be connected and treated by Susanville Sanitary District wastewater treatment system. With the inclusion of the bioretention basins, the proposed stormwater drainage system would be capable of handling existing and proposed stormwater volumes from the project site. This topic is not discussed further.

Mineral Resources

There are no known mineral resources in the vicinity of the project site and the site is not classed as a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan and the project would not create a loss of availability of a locally important mineral resource as none are present. This topic is not discussed further.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 3.6-1: Destroy a unique paleontological resource or site or unique geologic feature

Project construction would involve ground-disturbing activities in Quaternary and Pleistocene lake sediments, which have high sensitivity for paleontological resources. Therefore, the project has the potential to result in the destruction of scientifically significant paleontological resources. This impact would be **potentially significant**. However, with implementation of Mitigation Measure 3.6-1 Implement a Paleontological Resource Impact Mitigation Program, impacts to unknown paleontological resources underlying the Project site would be reduced. This impact **is less than significant with mitigation**.

As described in Section 3.6.2, "Environmental Setting," the Quaternary and Pleistocene lake sediments that underlie the project site have a strong potential to preserve scientifically significant fossils and are therefore considered to have high sensitivity for paleontological resources. This is confirmed in the Paleontological Resource Assessment Memorandum for the Project (Appendix F). Project construction would involve excavation to a maximum depth of 10 feet below the ground surface to install underground storage tanks, which would have potential to encounter sediments with high sensitivity for paleontological resources. Therefore, the project has the potential to result in the destruction of scientifically significant paleontological resources. This impact would be **potentially significant**.

Mitigation Measures

Mitigation Measure 3.6-1: Implement a Paleontological Resource Impact Mitigation Program

- Prior to the start of construction activities, the applicant shall retain a federally qualified paleontologist (qualified paleontologist) that meets the standards of the Society for Vertebrate Paleontology (2010) to carry out all mitigation measures related to paleontological resources.
- Before any ground-disturbing activities, the qualified paleontologist shall conduct pre-construction worker paleontological resources sensitivity training. The qualified paleontologist shall conduct any construction worker paleontological resources sensitivity training either in person or via a training module. The training shall include information on what types of paleontological resources could be encountered during excavations, what to do in case an unanticipated discovery is made by a worker, and laws protecting paleontological resources. All construction personnel shall be informed of the possibility of encountering fossils and be instructed to immediately inform the construction foreman or supervisor if any bones or other potential fossils are unexpectedly unearthed in an area where a paleontological monitor is not present. The applicant shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.
- The qualified paleontologist shall supervise a paleontological monitor who meets the Society for Vertebrate Paleontology standards (2010). The paleontological monitor shall be present during all excavations in the Quaternary lake sediments or when excavations in the alluvium are deep enough to encounter the older Pleistocene lake sediments. The exceptions are borings or auguring less than 3 feet in diameter. Specific depths and monitoring locations will be based on the finalized excavation plans, any available geotechnical reports, and consultation between the qualified paleontologist and the construction liaison.
- Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened standard sediment samples (up to 4.0 cubic yards) of promising horizons for smaller fossil remains (SVP 2010). Depending on the conditions encountered, full-time monitoring can be reduced to part-time inspections or ceased entirely if determined adequate by the qualified paleontologist, particularly if excavation is limited to artificial fill or the younger alluvium. The qualified paleontologist may spot check the excavation on an intermittent basis and recommend whether the depth of required monitoring should be revised based on his/her observations. Monitoring activities should be documented in a Paleontological Resources Monitoring Report to be prepared by the qualified paleontologist at the completion of construction and shall be provided to the applicant within six months of project completion. If fossil resources are identified during monitoring, the report will also be filed with the UCMP or other similar repository.
- If a paleontological resource is discovered during construction, the paleontological monitor shall be empowered to temporarily divert or redirect grading and excavation activities around the exposed resource to facilitate evaluation of the discovery. The qualified paleontologist shall analyze the discovered paleontological resource to determine whether it qualifies as a "unique paleontological resource." A unique paleontological resource means a paleontological resource about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets one of the two following criteria: (1) contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; or (2) has a special and particular quality such as being the oldest of its type or the best available example of its type.
- During the time period in which this assessment is being conducted, an appropriate buffer area of 50 feet around the fossil discovery shall be established by the qualified paleontologist where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All significant fossils qualifying as unique paleontological resources shall be collected by the paleontological monitor and/or the qualified paleontologist. Collected fossils should be prepared to the point of identification and catalogued before they are submitted to their final repository. Any fossils collected should be curated at a public, non-profit institution with a research interest in the materials, such as the UCMP, if such an institution agrees to accept the fossils. If no

institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, photographs, and a technical report shall also be filed at the repository and/or school.

Significance after Mitigation

Implementation of Mitigation Measure 3.6-1 includes procedures that provide for the protection of any unique paleontological resources encountered during project construction. Specifically, Mitigation Measure 3.6-1 requires the applicant to retain a qualified paleontologist to conduct pre-construction worker paleontological resources sensitivity training. The measure also requires a qualified paleontological monitor to be present for all excavations that are deep enough to encounter sediments with high sensitivity for paleontological resources (i.e., Pleistocene lake sediments). If paleontological resources are encountered during grading and excavation activities, the paleontological monitor would have the authority to divert or redirect construction activities. The paleontological monitor would then collect, identify, and catalogue any significant fossils qualifying as unique paleontological resources, submit the fossils to an appropriate repository, and summarize the findings in a technical report. Therefore, implementation of Mitigation Measure 3.6-1 would reduce impacts on unique paleontological resources to a **less-than-significant** level.

3.7 GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

This section presents a summary of regulations applicable to greenhouse gas (GHG) emissions, a summary of climate change science and GHG sources in California, and quantification of project-generated GHGs and discussion about their contribution to global climate change. Detailed calculations, modeling inputs, and results can be found in Appendix C of this EIR.

No comments in response to the NOP were received that identified concerns regarding GHG and climate change impacts.

3.7.1 Regulatory Setting

FEDERAL

There is no overarching federal law specifically related to climate change or the reduction of GHG emissions. Additionally, in March 2025, the current administration announced that EPA will undertake 31 actions, focusing primarily on reconsidering actions adopted by previous administrations, including numerous actions and regulations related to climate change and the reduction of GHG emissions. These include, but are not limited to, reconsideration of regulations related to fuel economy standards, power plants, among others. As of the writing of this Draft EIR, none of these regulations have been repealed or replaced with newly adopted regulations. Therefore, these regulations are discussed below.

Regulations for Greenhouse Gas Emissions from Passenger Cars and Trucks and Corporate Average Fuel Economy Standards

The Energy Policy and Conservation Act of 1975 (EPCA) mandated that the National Highway Traffic Safety Administration (NHTSA) establish and implement a regulatory program for motor vehicle fuel economy, known as the Corporate Average Fuel Economy (CAFE) program, to reduce national energy consumption. NHTSA and EPA developed two phases of standards. The first phase included final standards for model years 2017–2021, while the second phase covers model years 2022–2025. In 2018, NHTSA proposed revising the MY 2021 light-duty fuel economy standards and issuing new fuel economy standards for model years 2022 – 2026 as part of Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule. On January 20, 2021, President Biden issued Executive Order (EO) 13990, *Protecting Public Health and the Environment and Restoring Science To Tackle the Climate Crisis*, which directed NHTSA to consider publishing for notice and comment a proposed rule suspending, revising, or rescinding the SAFE Vehicles Final Rule by July 2021. NHTSA and EPA released the final rule in 2021 and released the Final Environmental Impact Statement (EIS) in March 2022 for model years 2024 – 2026, which will reduce fuel use by more than 200 billion gallons through 2050, as compared to continuing under the old standards (NHTSA 2022).

Affordable Clean Energy Rule

In June 2019, the Environmental Protection Agency (EPA), under authority of the Clean Air Act Section 111(d), issued the Affordable Clean Energy rule which provides guidance to states on establishing emissions performance standards for coal-fired electric generating units (EGUs). Under this rule, states are required to submit plans to EPA that demonstrate the use of specifically listed retrofit technologies and operating practices to achieve carbon dioxide (CO_2) emission reductions through heat rate improvement (HRI). HRI is a measurement of power plant efficiency that EPA determined as part of this rulemaking to be the best system of emission reductions for CO_2 generated from coal-fired EGUs (EPA 2018).

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 is designed to improve vehicle fuel economy and help reduce U.S. dependence on oil. It represents a major step forward in expanding the production of renewable fuels, reducing dependence on oil, and confronting global climate change. The Energy Independence and Security Act of 2007

increases the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel in 2022, which represents a nearly fivefold increase over current levels, and reduces U.S. demand for oil by setting a national fuel economy standard of 35 miles per gallon by 2020; an increase in fuel economy standards of 40 percent.

STATE

The State of California has adopted several laws addressing various aspects of climate change, GHG mitigation, energy efficiency, and renewable energy. These laws establish a broad framework for the state's long-term GHG and energy reduction goals and climate change adaptation program. Governors have also issued several executive orders (EOs) related to the state's evolving climate change policy.

The Federal Clean Air Act (CAA) allows California, and other states, to seek a waiver of preemption, which prohibits states from enacting emission standards for new motor vehicles. EPA must grant a waiver, however, before California's rules may be enforced, unless the EPA administrator finds that California: was arbitrary and capricious in its finding that its standards are, in the aggregate, at least as protective of public health and welfare as applicable federal standards; does not need such standards to meet compelling and extraordinary conditions; or such standards and accompanying enforcement procedures are not consistent with Section 202(a) of the CAA.

As of April 2025, the California Air Resources Board (CARB) has rescinded several preemption waiver requests to EPA. Also, U.S. Congress has enacted Public Law No. 119-16 to rescind the State's waiver under the CAA to enforce the Advanced Clean Cars II (ACC II) regulation. The implications of these actions are uncertain due to pending legal actions by the State of California. Therefore, these plans, policies, regulations, and laws established by state agencies are nevertheless presented below in the order they were established.

Statewide GHG Emission Targets and the Climate Change Scoping Plan

Reducing GHG emissions in California has been the focus of the state government for approximately two decades. GHG emission targets established by the state legislature include reducing statewide GHG emissions to 1990 levels by 2020 (Assembly Bill [AB] 32 of 2006) and reducing them to 40 percent below 1990 levels by 2030 (Senate Bill [SB] 32 of 2016). Executive Order S-3-05 calls for statewide GHG emissions to be reduced to 80 percent below 1990 levels by 2050. Executive Order B-55-18 calls for California to achieve carbon neutrality by 2045 and achieve and maintain net negative GHG emissions thereafter. These targets are in line with the scientifically established levels needed in the United States to limit the rise in global temperature to no more than 2 degrees Celsius, the warming threshold at which major climate disruptions, such as super droughts and rising sea levels, are projected; these targets also pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius (United Nations 2015:3).

California's 2017 Climate Change Scoping Plan (2017 Scoping Plan), prepared by the California Air Resources Board (CARB), outlines the main strategies California will implement to achieve the legislated GHG emission target for 2030 and "substantially advance toward our 2050 climate goals" (CARB 2017:1, 3, 5, 20, 25–26). It identifies the reductions needed by each GHG emission sector (e.g., transportation, industry, electricity generation, agriculture, commercial and residential, pollutants with high global warming potential, and recycling and waste).

On September 16, 2022, the state legislature passed AB 1279 which codified stringent emissions targets for the state of achieving carbon neutrality and an 85 percent reduction in 1990 emissions level by 2045. CARB released the *Final 2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan) on November 16, 2022 as also directed by AB 1279. The 2022 Scoping Plan traces the pathway for the state to achieve its carbon neutrality and an 85 percent reduction in 1990 emissions goal by 2045 using a combined top down, bottom up approach using various scenarios. In addition, Appendix D of the 2022 Scoping Plan includes recommended actions for local governments actions to implement through the CEQA and climate action planning process to ensure local actions align with the State's climate goals (CARB 2022).

The 2022 Scoping Plan focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities (CARB 2022). CARB adopted the 2022 Scoping Plan on December 16, 2022.

The state has also passed more detailed legislation addressing GHG emissions associated with industrial sources, transportation, electricity generation, and energy consumption, as summarized below.

Transportation-Related Standards and Regulations

As part of its Advanced Clean Cars (ACC) program, CARB established more stringent GHG emission standards and fuel efficiency standards for fossil fuel–powered on-road vehicles than EPA. In addition, the program's zero-emission vehicle (ZEV) regulation requires battery, fuel cell, and plug-in hybrid electric vehicles to account for up to 15 percent of California's new vehicle sales by 2025 (CARB 2018a). In August 2022, CARB adopted the ACC II program, which sets sales requirements for ZEVs to ultimately reach the goal of 100 percent ZEV sales in the state by 2035). As of June 2025, the U.S. Congress voted to limit California's authority to regulate vehicle emissions under existing programs provided through a waiver of the Clean Air Act. California is challenging the legality of Congress' action and, given the pending litigation, it is assumed CARB will continue to enforce these programs for the purpose of this analysis.

Executive Order B-48-18, issued by Governor Jerry Brown in January 2018, requires all State entities to work with the private sector to have at least 5 million ZEVs on the road by 2030, as well as 200 hydrogen fueling stations and 250,000 electric vehicle–charging stations installed by 2025. It specifies that 10,000 of these charging stations must be direct-current fast chargers.

CARB adopted the Low Carbon Fuel Standard (LCFS) in 2007 to reduce the carbon intensity of California's transportation fuels. The LCFS applies to fuels used by on-road motor vehicles and off-road vehicles, including construction equipment.

In addition to regulations that address tailpipe emissions and transportation fuels, the State legislature has passed regulations to address the amount of driving by on-road vehicles. Since passage of SB 375 in 2008, CARB requires metropolitan planning organizations (MPOs) to develop and adopt sustainable communities strategies (SCSs) in addition to the federally prepared regional transportation plans (RTPs) that show reductions in GHG emissions from passenger cars and light-duty trucks in their respective regions for 2020 and 2035 (CARB 2018b:1). These plans link land use and housing allocation to transportation planning and related mobile-source emissions.

SB 743 of 2013 required that the Governor's Office of Planning and Research (OPR) propose changes to the State CEQA Guidelines to address transportation impacts in transit priority areas and, at OPR's discretion, other areas of the State. In response, Section 15064.3 was added to CEQA in December 2018, requiring that transportation impacts no longer consider congestion but instead focus on the impacts of vehicle miles traveled (VMT). Agencies had until July 1, 2020 to implement these changes. In support of these changes, OPR published its *Technical Advisory on Evaluating Transportation Impacts in CEQA,* which recommends that the transportation impact of a project be based on whether the project would generate a level of VMT per capita (or VMT per employee or some other metric) that is 15 percent lower than that of existing development in the region (OPR 2017:12–13), or that a different threshold is used based on substantial evidence. OPR's technical advisory explains that this criterion is consistent with Public Resources Code Section 21099, which states that the criteria for determining significance must "promote the reduction of greenhouse gas emissions" (OPR 2017:18). This metric is intended to replace the use of delay and level of service to measure transportation-related impacts. More detail about SB 743 is provided in the "Regulatory Setting" section of Section 3.9, *Transportation*.

California Air Resources Board Truck and Bus Regulation

As part of CARB' s Sustainable Freight Strategy, CARB adopted the Truck and Bus Regulation. The latest amendments to the Truck and Bus Regulation became effective on December 31, 2014. The amended regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses had to meet particulate matter (PM) filter requirements as of January 1, 2012. Lighter and older heavier trucks had to be

replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent.

This regulation applies to nearly all privately and federally owned diesel-fueled trucks and buses and to privately and publicly owned school buses with a gross vehicle weight rating greater than 14,000 pounds. The regulation provides a variety of flexibility options tailored to fleets operating low use vehicles, fleets operating in selected vocations like agricultural and construction, and small fleets of three or fewer trucks (CARB 2015).

California Air Resources Board Advanced Clean Trucks Rule

To further advance the State' s Sustainable Freight Strategy, CARB adopted the Advanced Clean Trucks (ACT) Rule in July 2020, which requires manufacturers of vehicle class 2b through vehicle class 8 trucks to begin meeting escalating in-State ZEV sales from 2024 through 2035. By 2035, the ACT Rule will require 55 percent of trucks class 2b through class 3 to be ZEVs, 75 percent of trucks class 4 through class 8 to be ZEVs, and 40 percent of truck tractors to be ZEVs (CARB 2021). As of June 2025, the U.S. Congress voted to limit California's authority to regulate vehicle emissions under existing programs provided through a waiver of the Clean Air Act. California is challenging the legality of Congress' action and given the pending litigation, it is assumed CARB will continue to enforce these programs for the purpose of this analysis. Complementary to the ACT Rule, and as discussed further below, Executive Order N-79-20 set a goal of 100 percent of all in-State drayage truck sales to be ZEVs by 2035 and 100 percent of all in-State heavy-duty vehicle sales to be ZEVs by 2045. CARB is also in process of developing an Advanced Clean Fleet (ACF) Rule to accelerate the ACT Rule by requiring 100 percent of all in-State sales to be ZEVs in 2040 for class 2b through class 3 trucks, class 4 through class 8 vocational trucks, and class 7 through class 8 tractor trucks. The ACF Rule would also provide a clear timeline for requirements for phasing in in-State ZEV sales targets through 2040 (CARB 2022). As of June 2025, CARB is evaluating next steps regarding the ACF Regulation and is not enforcing the existing portions of the ACF Regulation that require a federal waiver or authorization, such as the portions of the ACF Regulation that apply to high priority and drayage fleets. However, not all elements of the ACF Regulation require a federal waiver or authorization and the State and local government fleets portion of the ACF Regulation remains unaffected.

Legislation Associated with Electricity Generation

The state has passed legislation requiring the increasing use of renewables to produce electricity for consumers. California utilities are required to generate 33 percent of their electricity from renewables by 2020 (SB X1-2 of 2011); 52 percent by 2027 (SB 100 of 2018); 60 percent by 2030 (also SB 100 of 2018); and 100 percent by 2045 (also SB 100 of 2018).

Building Energy Efficiency Standards (Title 24, Part 6)

The energy consumption of new residential and nonresidential buildings in California is regulated by the California Code of Regulations Title 24, Part 6, Building Energy Efficiency Standards (California Energy Code or CALGreen). The California Energy Commission (CEC) updates the California Energy Code every three years with more stringent design requirements for reduced energy consumption, which results in the generation of fewer GHG emissions. The current California Energy Code will require builders to use more energy-efficient building technologies for compliance with increased restrictions on allowable energy use. The core focus of the building standards has been efficiency, but the 2019 Energy Code ventured into onsite generation by requiring solar photovoltaic (PV) on new homes, providing significant GHG savings. The most recent is the 2022 California Energy Code advances the onsite energy generation progress started in the 2019 California Energy Code, by encouraging electric heat pump technology and use, establishing electric-ready requirements when natural gas is installed, expanding solar PV system and battery storage standards, and strengthening ventilation standards to improve indoor air quality. The CEC estimates that the 2022 California Energy Code will save consumers $1.5 billion and reduce GHGs by 10 $MMTCO_2e$ over the next 30 years (CEC 2021). Title 24 includes both mandatory and voluntary measures. The voluntary measures are designed to serve as recommendations for local governments to use in considering above-code ordinances (also known as "reach" codes), and they also provide measures a builder can use to voluntarily exceed CALGreen requirements. The voluntary measures are grouped into two "voluntary" tiers: Tier 1 adds additional requirements for various categories (e.g., EV charging, water savings, construction waste reduction) beyond the mandatory measures, while Tier 2 further increases these requirements. In legislation effective July 1, 2025, the State mandated a three-year freeze on local

governments adopting "above-code" ordinances/"reach" codes related to the California Building Code and CALGreen Standards for residential development.

LOCAL

Lassen County Air Pollution Control District

The Lassen County Air Pollution Control District (LCAPCD) manages the local air quality for the Lassen County Region and regulates the stationary sources of air pollution, administers grant programs and permits, and enforces state, local, and federal air pollution laws and regulation in Lassen County. However, LCAPCD does not include any goals or policies directly related to reducing GHG emissions, nor do they specify adopted numerical thresholds of significance for determining a GHG impact for CEQA documents.

Lassen County General Plan 2000

The County's General Plan was adopted in 1999 and contains the following policies that are indirectly related to reducing GHGs that are applicable to the project.

- NR61 Policy: The County advocates and encourages Federal and state agencies to conduct or help fund resource assessments· and other studies to evaluate the availability of energy resources, and to facilitate efficient and well-designed projects which can capitalize on those resources with acceptable levels of environmental impact and compatibility with other land uses and resource values.
- NR62 Policy: In the course of adopting policies pertaining to energy resources in other County planning elements and area plans, the County may consider additional and more specific policies and measures to manage those resources.
- NR63 Policy: The Energy Element of the Lassen County General Plan shall provide specific policies and measures pertaining to the conservation and management of energy resources, as well as the siting and development standards of projects proposing to utilize those resources.
- NR74 Policy: The Board of Supervisors will continue to consider, adopt, and enforce feasible air quality standards which protect the quality of the County's air resources.
- NR75 Policy: The County shall consider the appropriateness and feasibility of air pollution control requirements for individual projects and may grant variances to specific requirements pursuant to established procedural guidelines.
- NR76 Policy: Federal and state agencies shall be encourages to assist the County in protecting the quality of its air resources.
- NR77 Policy: In the course of adopting policies pertaining to air resources in other County planning elements and plan areas, the County may consider additional and more particular policies and measures to protect the quality of air resources.

Susanville General Plan

Susanville's General Plan was adopted in 1991 and the City is in the process of updating the various elements of the General Plan. As of mid-2025, the City has adopted updates to the Land Use, Circulation, and Housing Elements, and plans to update the remaining elements. The City's General Plan, including the 1991 Community Health, Safety, and Conservation Element and the 2025 Circulation Element contains the following goals and policies that are indirectly related to reducing GHGs that are applicable to the project.

1991 Community Health, Safety, and Conservation Element

- Policy h. The City shall undertake practices to improve Susanville's air quality, including reducing the emission of particulate matter from wood fires in stoves and fireplaces.

- Action Program [12]: Encourage all new construction to include geothermal heating or active or passive solar heating, and educate developers and homeowners regarding the availability and advantages of alternative heating sources.

2025 Circulation Element

GOAL CIR-3: Explore the utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single occupancy vehicles (SOVs) where feasible.

- Policy CIR-3.1: TDM Measures. Encourage measures to reduce vehicle-miles travelled (VMT). Examples include transit incentives, park and ride facilities, and telecommuting facilities.
- Policy CIR-3.2: Transit Mode Share. Implement recommendations in regional transit plans to increase the mode share of public transit in the City of Susanville.
- Policy CIR-3.3: Ride Share Programs. Encourage the establishment of a formal, city-wide ride-share program. Promote the use of rideshare opportunities through partnerships and media.

GOAL CIR-6: Include bikeway facilities in all appropriate future development projects to facilitate on-site circulation for bicycle travel, on-site bicycle parking, and connections to the proposed system.

- Policy CIR-6.3: Bicycle Facilities. Support provision of parking, shelters, and off-street facilities, where feasible and practical, to promote bicycle and pedestrian travel. Require future developments that might experience a high bicycle demand, such as commercial areas, parks, libraries, and schools, to support these facilities.

3.7.2 Environmental Setting

THE PHYSICAL SCIENTIFIC BASIS OF GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

Certain gases in the earth's atmosphere, classified as GHGs, play a critical role in determining the earth's surface temperature. Solar radiation enters the atmosphere from space. A portion of the radiation is absorbed by the earth's surface, and a smaller portion of this radiation is reflected toward space. The absorbed radiation is then emitted from the earth as low-frequency infrared radiation. The frequencies at which bodies emit radiation are proportional to temperature. The earth has a much lower temperature than the sun; therefore, the earth emits lower frequency radiation. Most solar radiation passes through GHGs; however, infrared radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on earth.

Prominent GHGs contributing to the greenhouse effect are CO_2, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Human-caused emissions of these GHGs in excess of natural ambient concentrations are found to be responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the earth's climate, known as global climate change or global warming. It is "extremely likely" that more than half of the observed increase in global average surface temperature from 1951 to 2010 was caused by the anthropogenic increase in GHG concentrations and other anthropogenic forcing (IPCC 2021).

Climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants, which are pollutants of regional and local concern. Whereas most pollutants with localized air quality effects have relatively short atmospheric lifetimes (approximately 1 day), GHGs have long atmospheric lifetimes (1 year to several thousand years). GHGs persist in the atmosphere long enough to be dispersed around the globe. Although the lifetime of any GHG molecule depends on multiple variables and cannot be determined with any certainty, it is understood that more CO_2 is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, and other forms of sequestration. Of the total annual human-caused CO_2 emissions, approximately 55 percent are

estimated to be sequestered through ocean and land uptake every year, averaged over the last 50 years, whereas the remaining 45 percent of human-caused CO_2 emissions remain stored in the atmosphere (IPCC 2013:467).

The quantity of GHGs in the atmosphere responsible for climate change is not precisely known, but it is enormous. No single project alone would measurably contribute to an incremental change in the global average temperature or to global or local climates or microclimates. From the standpoint of CEQA, GHG impacts relative to global climate change are inherently cumulative.

GREENHOUSE GAS EMISSION SOURCES

As discussed previously, GHG emissions are attributable in large part to human activities. The total GHG inventory for California in 2022 was 371 million metric tons of carbon dioxide equivalent ($MMTCO_2e$) (CARB 2024). This is less than the 2020 target of 431 $MMTCO_2e$ (CARB 2018c:1). Table 3.7-1 summarizes the statewide GHG inventory for California, and as shown, transportation, industry, and electricity generation are the largest GHG emission sectors.

Emissions of CO_2 are byproducts of fossil fuel combustion. Methane, a highly potent GHG, primarily results from off-gassing (the release of chemicals from nonmetallic substances under ambient or greater pressure conditions) and is largely associated with agricultural practices and landfills. Nitrous oxide is also largely attributable to agricultural practices and soil management. CO_2 sinks, or reservoirs, include vegetation and the ocean, which absorb CO_2 through sequestration and dissolution (CO_2 dissolving into the water), respectively, two of the most common processes for removing CO_2 from the atmosphere.

Table 3.7-1 California Greenhouse Gas Emissions Inventory for 2022 ($MTCO_2e$)

Emissions Sector	$MTCO_2e$/year
Transportation	144
Industrial	84
Electricity (In State)	42
Electricity (Imports)	18
Agriculture	30
Commercial	23
Residential	31
Total	371

Notes: Totals may not equal the sum of the numbers because of independent rounding.

$MTCO^2e$ = metric tons of carbon dioxide equivalent.

Source: CARB 2024.

EFFECTS OF CLIMATE CHANGE ON THE ENVIRONMENT

The global average temperature is expected to increase by 3 to 7°F by the end of the century, depending on future GHG emission scenarios (IPCC 2007). According to California's Fourth Climate Change Assessment, depending on future GHG emissions scenarios, average annual maximum daily temperatures in California are projected to increase between 3.6 and 5.8°F by 2050 and by 5.6 to 8.8°F by 2100 (OPR, CEC, and CNRA 2018).

Other environmental resources could be indirectly affected by the accumulation of GHG emissions and resulting rise in global average temperature. In recent years, California has been marked by extreme weather and its effects. Climate model projections for California demonstrate that impacts will vary throughout the state and show a tendency for the northern part of the state to become wetter and the southern portion of California to become drier (Pierce et al. 2018). According to California Natural Resources Agency's report, *Safeguarding California Plan: 2018 Update* (CNRA 2018), California experienced the driest four-year statewide precipitation on record from 2012 through 2015; the warmest years on average in 2014, 2015, and 2016; and the smallest and second smallest Sierra snowpack

on record in 2015 and 2014 (CNRA 2018). Climate model projections included in California's Fourth Climate Change Assessment demonstrate that seasonal summer dryness in California may be prolonged due to earlier spring soil drying and would last longer into the fall and winter rainy season. Increases in temperature are also predicted to result in changes to California's snowpack. Based on climate model projections, the mean snow water equivalent, a common measurement which indicates the amount of water contained within snowpack, in California is anticipated to decline to two-thirds of its historic average by 2050 and between less than half and less than one-third of historic average by 2100, depending on future emissions scenarios (OPR, CEC, and CNRA 2018).

Climate model projections demonstrate that California will experience variation in precipitation patterns as well. The Northern Sierra Nevada range experienced its wettest year on record in 2016 (CNRA 2018). With a shifting climate, California has been more susceptible to the adverse effects of atmospheric rivers, which are large scale, high-precipitation events that deposit above-average levels of rainfall to California's coasts within a short duration. These events have the capacity to overwhelm existing stormwater systems leading to localized flooding impacts.

Climate change is also projected to result in tertiary impacts on energy infrastructure throughout California. Changes in temperature, precipitation patterns, extreme weather events, and sea-level rise have the potential to affect and decrease the efficiency of thermal power plants and substations, decrease the capacity of transmission lines, disrupt electrical demand, and threaten energy infrastructure with the increased risk of flooding (CNRA 2018).

According to California's Fourth Climate Change Assessment, climate change will create impacts on the state's transportation network that will have 'ripple effects,' including direct and indirect impacts on interdependent infrastructure networks as well as negative impacts on the economy. Without appropriate adaptations strategies for roadway materials (i.e., asphalt and pavement), researchers estimate that the median total cost to California for 2040-2070 will be between $1 billion and $1.25 billion (OPR, CEC, and CNRA 2018). The California Department of Transportation (Caltrans) owns and operates more than 51,000 miles along 265 highways, as well as three of the busiest passenger rail lines in the nation. Sea level rise, storm surge, and coastal erosion are imminent threats to highways, roads, bridge supports, airports, transit systems and rail lines near sea level and seaports. Shifting precipitation patterns, increased temperatures, wildfires, and increased frequency in extreme weather events also threaten transportation systems across the state. Temperature extremes and increased precipitation can increase the risk of road and railroad track failure, decreased transportation safety, and increased maintenance costs (CNRA 2018). Modeling for flood events in California demonstrates that approximately 370 miles of highways are susceptible to flooding in a 100-year storm event by the year 2100 (OPR, CEC, and CNRA 2018).

Water availability and changing temperatures affect the prevalence of pests, disease, and species, which will directly impact crop development, forest health, and livestock production. Other environmental concerns include decline in water quality, groundwater security, and soil health (CNRA 2018). Vulnerabilities of water resources also include risks to degradation of watersheds, alteration of ecosystems and loss of habitat, (OPR, CEC, and CNRA 2018).

California's Fourth Climate Change Assessment also identifies the impacts climate change will have on public health and social systems. Average temperature increases in California are estimated to have impacts on human mortality, with 6,700 to 11,300 additional annual deaths in 2050, depending on higher or lower emissions scenarios (Ostro et al. 2011). Studies have also shown that impacts from climate change can also have indirect impacts on public health, such as increased vector-borne diseases, and stress and mental trauma due to extreme events, economic disruptions, and residential displacement (Gould and Dervin 2012; McMichael and Lindgren 2011; US Global Change Research Program 2016).

3.7.3 Environmental Impacts and Mitigation Measures

METHODOLOGY

GHG emissions associated with the project would be generated during project construction and during operation after the project is built. Estimated levels of construction- and operation-related GHGs are presented below. GHG emissions were quantified using industry standard and accepted software tools, techniques, and emission factors.

Greenhouse Gas Emissions

GHG emissions from the construction and operation of the project site were calculated using the California Emissions Estimator Model (CalEEMod) Version 2022.1.1.29 computer program. Construction is anticipated to start in July 2026 and last 12 months, ending in July 2027. Project construction was modeled in CalEEMod using a combination of model defaults and project-specific information. Model defaults were used for construction fleet, hours of use per day for each piece, worker and vendor trip numbers, and worker and vendor trip length. It was assumed all cut and fill materials would be balanced on-site during grading and excavation and 500 cubic yards of pavement and concrete would be removed during demolition.

Operational GHG emissions were estimated using project-specific information, where available, and default values in CalEEMod based on the project's location and land use. Mobile-source emissions were modeled using trip generation and vehicle miles traveled data from the transportation analysis, provided in Appendix I of this EIR, and emission rates from EMFAC2021. Indirect emissions associated with electricity consumption, and solid waste generation were estimated using the applicable modules of CalEEMod using default consumption values. Energy estimates assumed in the modeling accounts for on-site renewable energy production, as the project is expected to generate approximately 51,000 kWh/year through installing a solar Photovoltaic (PV) System. The project would limit natural gas combustion to only the commercial kitchens on site. Emissions associated with natural gas consumption were estimated based on default consumption data for fast-food uses within CalEEMod. All other energy needs were assumed to be provided by electricity. Since the project would power all energy needs, except commercial kitchens, with electricity, this analysis assumes the energy required (in BTU) to replace Natural Gas (assuming no NG allowed) taken over by Electricity assuming 3.412 Btu is equal to one kwh (EIA 2024). Water consumption estimates assumed in the emissions modeling was based on 9,000 gallons per day, split into indoor and outdoor (landscaping) uses, as described in Section 2, "Project Description." The City of Susanville currently provides natural gas to the city and would also provide natural gas to the project site. Operational emissions from all sources were estimated for full buildout of the project which is based on the assumption that the project would become fully operational in 2027. Detailed model assumptions and inputs for these calculations can be found in Appendix C of this EIR.

THRESHOLDS OF SIGNIFICANCE

State CEQA Guidelines, Section 15064 and relevant portions of Appendix G, a sample Initial Study checklist, recommend that a lead agency consider a project's consistency with relevant, adopted plans and discuss any inconsistencies with applicable regional plans, including plans to reduce GHG emissions. It is a common practice for lead agencies to use the inquiries found in Appendix G for purposes of fashioning significance thresholds. Here, the City, in its discretion, has done so. Thus, the proposed project would result in a cumulatively considerable contribution to climate change if it would:

- generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
- conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

CEQA Guidelines Section 15064.4 provides guidance to lead agencies for determining the significance of impacts from GHG emissions. Section 15064.4(a) provides that a lead agency shall make a good-faith effort based, to the extent possible, based on scientific and factual data to describe, calculate, or estimate the amount of GHG emissions resulting from a project. Section 15064.4(a) further provides that a lead agency has the discretion to determine, within the context of a particular project, whether to quantify GHG emissions from a project or rely on qualitative analysis or performance-based standards.

The CEQA Guidelines do not provide numeric or quantitative thresholds of significance for evaluating GHG emissions. Instead, they leave the determination of the significance threshold up to the lead agency and give it the discretion to come up with their own thresholds or adopt thresholds previously adopted or recommended by other public agencies or experts, provided that the lead agency's decision is supported by substantial evidence (CEQA Guidelines Sections 15064.7[b] and 15064.7[c]).

As discussed in Section 3.7.1, "Regulatory Setting," LCAPCD does not have adopted numerical thresholds of significance for determining a GHG impact for CEQA documents. As LCAPCD and other adjacent Air Districts near to the project site (such as Shasta, Tehama and Northern Sierra) do not have numerical thresholds of significance, Sacramento Metropolitan Air Quality Management District's (SMAQMD) guidance was selected because it is reasonably close to the project site and has adopted significance thresholds (SMAQMD 2021). Additionally, Placer County Air Pollution Control District, another proximate APCD to the project site, whose jurisdiction includes rural and semi-rural areas similar to the region containing the project site, also uses the same significance thresholds as SMAQMD. SMAQMD has adopted an operational significance threshold of 10,000 $MTCO_2e$ threshold for stationary/industrial (SMAQMD 2021). SMAQMD guidance recommends that projects utilize the GHG Operational Screening Levels table contained within the Guide to Air Quality Assessment in Sacramento County (CEQA Guide; SMAQMD 2021) to first determine if a project may screen out of further GHG impacts analysis. According to SMAQMD guidance, if a project does not initially screen out, project emissions should be estimated quantitatively and compared to SMAQMD's project-level threshold of 1,100 $MTCO_2e$ per year. SMAQMD's Operational Screening Levels table includes some land uses that are similar to components of the project (i.e., 4000 square feet (ksf) Fast Food Restaurant with Drive Thru, 20ksf Free-standing Discount Store, 12ksf Supermarket) but the project, as a whole, does not fit within any of the land use categories in the table. Nevertheless, due to the project's size (including a combined, approximately 13ksf convenience store and two fast-food options) and primary sources of GHG emissions (energy, refrigeration, and mobile sources), the 1,100 $MTCO_2e$ threshold is appropriate here. As explained by SMAQMD, this threshold is intended for land use projects where the majority of GHG emissions are related to building energy or mobile vehicle traffic (SMAQMD 2021.) While the project is not within the jurisdiction of SMAQMD and thus is not required to incorporate mandatory measures such as SMAQMD's Tier 1 BMPs (BMP 1: No natural gas, and BMP 2: Electric Vehicle ready), SMAQMD's guidance permits alternative means of reducing GHG emissions. Here, the project includes design features, including limiting natural gas use to the commercial kitchens, solar PV, and EV charging stations, that will similarly reduce the project's GHG emissions. Thus, the GHG emissions impact would be significant if implementation of the proposed project would:

- generate GHG emissions during construction that would exceed 1,100 $MTCO_2e$ per year, and
- generate GHG emissions during operations that would exceed 1,100 $MTCO_2e$ per year.

ISSUES NOT DISCUSSED FURTHER

The Lassen County General Plan, the Susanville Vicinity Area Plan, and the City of Susanville General Plan do not identify specific GHG or climate change policies or goals. As of the writing of this Draft EIR, the City of Susanville General Plan, which would be the operative document if the project is approved by the City and the annexation is approved by LAFCO, also does not identify specific GHG or climate change policies or goals. However, the General Plan is in the process of being updated but has an unknown schedule for public release. As such, the current planning documents at the time the NOP for the Draft EIR was released include the Lassen County General Plan and the Susanville Vicinity Area Plan. The Lassen County General Plan and Susanville General Plan (1991 Community Health, Safety, and Conservation Element and 2025 Circulation Element) do, nonetheless, include policies that are indirectly related to reducing GHGs, such as reduction in the use of wood fires in stoves/fireplaces, include geothermal heating or active or passive solar heating, TDM measures, and supporting provision of bicycle and pedestrian facilities. Therefore, in the absence of any adopted, quantitative threshold, the proposed project would not have a significant effect on the environment if the proposed project is found to be consistent with the applicable regulatory plans and policies to reduce GHG emissions, including CARB's 2022 Scoping Plan. As identified in the Initial Study for this EIR (Appendix A), jurisdictions taking meaningful climate action aligned with the State's climate goals in the absence of a CEQA-qualified Climate Action Plan should also look to the three priority areas to reduce GHG emissions: transportation electrification, VMT reduction, and building decarbonization. To assist local jurisdictions, Appendix D of the Scoping Plan presents a non-exhaustive list of impactful GHG reduction strategies that can be implemented by local governments within the three priority areas (Priority GHG Reduction Strategies for Local Government Climate Action Priority Areas). The Appendix D Local Actions include recommendations to build momentum for local government actions that align with the State's climate goals, with a focus on local GHG reduction strategies

(commonly referred to as climate action planning) and approval of new land use development projects, including through environmental review under CEQA. The recommendations provided in Appendix D are non-binding (i.e., not regulatory) and should not be interpreted as a directive to local governments, but rather as evidence-based analytical tools to assist local governments with their role as essential partners in achieving California's climate goals. The project would include solar panels which would be installed in accordance with the California Energy Code requirements, three EV charging spaces, or however many spaces are required in accordance with the CALGreen code at the time the building permit is submitted, would not include on-site natural gas, except for usage in the commercial kitchens, and provide bicycle facilities that would meet or exceed the respective codes. The project would align with the VMT reductions in OPR's guidance as the project would result in mostly pass-by trips, as vehicles, trucks, and recreational vehicles divert only 0.14 miles from SR-36 and would not result in a substantial VMT increase, thus helping to reduce VMT, decarbonize the building and help transportation electrification. In addition to alignment with the recommendations in Appendix D Local Actions, the use of solar, EV charging/EV capable/EV ready spaces and facilitation of a future Class I bicycle lane (see Section 3.9 of this EIR) would also ensure the project does not conflict with those policies outlined in the Lassen County General Plan and Susanville General Plan, even though they do not directly relate to reducing GHGs. This issue is not discussed further.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 3.7-1: Generate GHG Emissions, Either Directly or Indirectly, that May Have a Significant Impact on the Environment

Regarding construction, the proposed project would emit GHGs related to the use of heavy construction equipment as well as hauling, vendor, and worker trips. Construction of the project would generate 186 $MTCO_2e$ in the first year of construction and 131 $MTCO_2e$ in the second year of construction for a total of 325 MTCO2e. Thus, construction of the project would not exceed the 1,100 MTCO2ebrightline threshold.

Implementation of the project would generate GHG emissions through operational activities such as vehicle trips, area sources, electricity consumption, water use, and waste generation. Project operations would generate 783 annual $MTCO_2e$ from project operations, which is below the 1,100 $MTCO_2e$ brightline threshold. Therefore, the project would not have a significant impact on the environment, and this impact would be **less than significant**.

Construction

Project-related construction activities would result in GHG emissions from the use of heavy-duty off-road construction equipment, delivery trucks associated with materials transport, and vehicle use during worker commute. Table 3.7-2 summarized the estimated GHG emissions associated with construction of the project.

Table 3.7-2 Construction-Generated Greenhouse Gas Emissions

Year of Construction	$MTCO_2e$
2026	195
2027	131
Total	**325**

Notes: Totals may not add due to independent rounding.

$MTCO_2e$ = metric tons of carbon dioxide equivalent; GHG = greenhouse gas.

See Appendix C for detailed input parameters and modeling results.

Source: Modeling conducted by Ascent in 2024.

As shown in Table 3.7-2, project-generated construction emissions would not exceed the brightline threshold of significance of 1,100 $MTCO_2e$ for either year of construction.

Operations

Operation of the project would result in mobile-source GHG emissions associated with vehicle trips to and from the project, area-source emissions from the operation of landscape maintenance equipment, energy-source emissions from the consumption of electricity, water-related energy consumption associated with water use and the conveyance and treatment of wastewater, waste-generated emissions from the transport and disposal of solid waste, and emissions associated with building air conditioning (A/C) and refrigeration equipment. Table 3.7-3 summarizes the project-operational GHG emissions.

Table 3.7-3 Project-Generated Operational Greenhouse Gas Emissions

Emissions Source	$MTCO_2e$
Mobile Sources	178
Area Sources	7
Electricity (including solar reduction)	236
Natural Gas	35
Water Consumption and Wastewater Generation	6
Solid Waste	31
Refrigeration	274
Total Operational GHG Emissions	**783**

Notes: Totals may not add due to independent rounding.

$MTCO_2e$ = metric tons of carbon dioxide equivalent; GHG = greenhouse gas.

See Appendix C for detailed input parameters and modeling results.

Source: Modeling conducted by Ascent in 2024.

As shown in Table 3.7-3, the project would generate operational GHG emissions of 783 $MTCO_2e$ at its opening year (2027) and thus would not exceed the threshold of 1,100 $MTCO_2e$. It is worth noting that the emissions analysis is based on a set of conservative emissions assumptions that are likely over-estimating emissions. For instance, emissions associated with the RV park assume that all RV spaces will be occupied every day of the year, and half of each RV would travel from regional destinations.

Emission estimates in this analysis take into account an older version of Title 24 standards for commercial buildings known at the time of model development, whereas the project will be built to the more modern Title 24 standards (2022 or newer), which will result in lower electricity consumption from building uses assumed herein. Additionally, it is estimated that the project will generate 51,000 kWh per year through solar PV installations, further reducing the energy consumption and GHG emissions by 16 $MTCO_2e$/year.

Summary

Implementation of the project would generate a total of 317 $MTCO_2e$ during project construction and 783 $MTCO_2e$ annually during project operations. Both of these would be below the thresholds of significance for construction and operational GHG emissions. Additionally, the project would install EV parking consistent with the CalGreen Code standards, promote energy and lighting efficiency, consistent with Title 24 standards including solar, and would preclude onsite natural gas usage except for the commercial kitchens. The 2022 Scoping Plan and AB 1279 establish target emission levels under the presumption that achieving these targets through GHG emissions reduction would avoid or substantially lessen significant impacts on the environment. Therefore, the project's impact to the environment due to GHG emissions during construction and at operation would be **less than significant**.

3.8 NOISE AND VIBRATION

This section includes a summary of applicable regulations related to noise and vibration, a description of ambient noise conditions, and an analysis of potential short-term construction and long-term operational noise impacts associated with Susanville Travel Stop. Additional data is provided in Appendix G, "Noise Measurement Data and Noise Modeling Calculations."

No comments in response to the NOP were received that identified concerns regarding noise and vibration.

3.8.1 Common Noise Descriptors

Noise in our daily environment fluctuates over time. Various noise descriptors have been developed to describe time-varying noise levels. The following are the noise descriptors used throughout this section.

Equivalent Continuous Sound Level (L_{eq}): L_{eq} represents an average of the sound energy occurring over a specified period. In effect, L_{eq} is the steady-state sound level containing the same acoustical energy as the time-varying sound level that occurs during the same period (Caltrans 2013:2-48). For instance, the 1-hour equivalent sound level, also referred to as the hourly L_{eq}, is the energy average of sound levels occurring during a 1-hour period and is the basis for noise abatement criteria used by California Department of Transportation (Caltrans) and Federal Transit Administration (FTA) (Caltrans 2013:2-47; FTA 2018:2-19).

Percentile-Exceeded Sound Level (L_X): L_X represents the sound level exceeded for a given percentage of a specified period (e.g., L_{10} is the sound level exceeded 10 percent of the time, and L_{90} is the sound level exceeded 90 percent of the time) (Caltrans 2013:2-16).

Maximum Sound Level (L_{max}): L_{max} is the highest instantaneous sound level measured during a specified period (Caltrans 2013:2-48; FTA 2018:2-16).

Day-Night Level (L_{dn}): L_{dn} is the energy average of A-weighted sound levels occurring over a 24-hour period, with a 10-decibel (dB) "penalty" applied to sound levels occurring during nighttime hours between 10 p.m. and 7 a.m. (Caltrans 2013:2-48; FTA 2018:2-22).

Community Noise Equivalent Level (CNEL): CNEL is the energy average of the A-weighted sound levels occurring over a 24-hour period, with a 10-dB penalty applied to sound levels occurring during the nighttime hours between 10 p.m. and 7 a.m. and a 5-dB penalty applied to the sound levels occurring during evening hours between 7 p.m. and 10 p.m. (Caltrans 2013:2-48).

3.8.2 Regulatory Setting

FEDERAL

Federal Noise Control Act of 1972

The Federal Noise Control Act of 1972 (42 United States Code Section 4901 et seq.) established a requirement that all Federal agencies must comply with applicable Federal, State, interstate, and local noise control regulations. Federal agencies also are directed to administer their programs in a manner that promotes an environment free from noise that jeopardizes public health or welfare.

Federal Transit Administration

To address the human response to ground vibration, FTA has set forth guidelines for maximum-acceptable vibration criteria for different types of land uses. These guidelines are presented in Table 3.8-1. FTA has also established construction vibration damage criteria, shown in Table 3.8-2.

Table 3.8-1 Ground-Borne Vibration Impact Criteria for General Assessment

Land Use Category	GVB Impact Levels (VdB re 1 micro-inch/second) Frequent Events[1]	GVB Impact Levels (VdB re 1 micro-inch/second) Occasional Events[2]	GVB Impact Levels (VdB re 1 micro-inch/second) Infrequent Events[3]
Category 1: Buildings where vibration would interfere with interior operations.	65[4]	65[4]	65[4]
Category 2: Residences and buildings where people normally sleep.	72	75	80
Category 3: Institutional land uses with primarily daytime uses.	75	78	83

Notes: GVB = ground-borne vibration; VdB = vibration decibels referenced to 1 µ inch/second and based on the root mean square (RMS) velocity amplitude.

[1] "Frequent Events" is defined as more than 70 vibration events of the same source per day.

[2] "Occasional Events" is defined as between 30 and 70 vibration events of the same source per day.

[3] "Infrequent Events" is defined as fewer than 30 vibration events of the same source per day.

[4] This criterion is based on levels that are acceptable for most moderately sensitive equipment such as optical microscopes. Vibration-sensitive manufacturing or research would require detailed evaluation to define acceptable vibration levels.

Source: FTA 2018: 123–126.

Table 3.8-2 FTA Construction Damage Vibration Criteria

Land Use Category	PPV in/sec
Reinforced-concrete, steel or timber (no plaster)	0.5
Engineered concrete and masonry (no plaster)	0.3
Non-engineered timber and masonry buildings	0.2
Buildings extremely susceptible to vibration damage	0.12

Notes: PPV = peak particle velocity, in/sec = inches per second.

Source: FTA 2018.

In addition to vibration criteria, FTA has also established construction noise criteria based on the land use type affected by noise and depending on whether or not construction noise would occur during the daytime or nighttime. The FTA criteria are as follows:

- Residential: 90 A-weighted decibels (dBA) L_{eq} (day) and 80 dBA L_{eq} (night)

Federal Interagency Committee on Noise

The Federal Interagency Committee on Noise (FICON) established criteria for the impact of increases in ambient noise levels. A noise level increase of 5.0 dB, or greater, would typically be considered to result in increased levels of annoyance where existing ambient noise levels are less than 60 dB. Within areas where the ambient noise level ranges from 60 to 65 dB, increased levels of annoyance would be anticipated at increases of 3-dB, or greater. Increases of 1.5 dB, or greater, could result in increased levels of annoyance in areas where the ambient noise level exceeds 65 dB. The rationale for the FICON recommended criteria is that, as ambient noise levels increase, a smaller increase in noise resulting from a project is sufficient to cause a significant increase in response to noise (FICON 1992). Table 3.8-3 details criteria established by FICON to evaluate increases in ambient noise levels.

Table 3.8-3 Federal Interagency Committee on Noise Recommended Criteria for Evaluation of Increases in Ambient Noise Levels

Ambient Noise Level without the Project (L_{dn})	Increase Required for Significant Impact
<60 dB	5.0 dB, or greater
60-65 dB	3.0 dB, or greater
>65 dB	1.5 dB, or greater

Notes: L_{dn} = day-night average noise levels; dB = decibels.

Source: FICON 1992.

STATE

California General Plan Guidelines

The State of California General Plan Guidelines 2017, published by the California Governor's Office of Planning and Research (OPR) (2017), provides guidance for the compatibility of projects within areas of specific noise exposure. Acceptable and unacceptable community noise exposure limits for various land use categories have been determined to help guide new land use decisions in California communities. In many local jurisdictions, these guidelines are used to derive local noise standards and guidance. Citing EPA materials and the State Sound Transmissions Control Standards, the State's general plan guidelines recommend interior and exterior CNEL of 45 and 60 dB for residential units, respectively (OPR 2017:378).

LOCAL

Lassen County

Lassen County has a general plan and code of ordinances with established single noise and cumulative noise-level performance standards for new projects affected by or including non-transportation noise sources, and maximum allowable noise exposure levels for transportation noise sources.

The project site is adjacent to sensitive receptors located within the jurisdiction of Lassen County and is subject to thresholds, policies, and regulations contained therein. Relevant policies and standards established are summarized below.

Lassen County General Plan

Lassen County Noise Element

Standard N-1. CNEL Standards by Land Use Category

New noise-generating land uses may not exceed the following standards (as presented in Table 3.8-4) at the property line for the parcel containing said noise-generating use. For noise-sensitive uses in a project's vicinity, exterior noise standards shall be measured at the property line of the receiving noise-sensitive use (or at the yard boundary for residences on agriculture land), and interior noise standards shall be measured with all doors and windows closed.

Table 3.8-4 Community Noise Equivalent Level Standards for Receiving Land Uses

Land Use Category	Interior Noise Standard (dBA CNEL)	Exterior Noise Standard (dBA CNEL)*
Residential	45	65
Recreational/Open Space	N/A	65
Institutional	45	65
Commercial/Retail	50	75[b]
Industrial	N/A	90[b]
Agriculture	N/A	90
Resource Extraction	N/A	90[b]
Public Right-of-Way	N/A	90

Notes: dBA = A-weighted decibels.

[a] These noise generation limits are translated into hourly average (L_{eq}) limits in Lassen County Code, Section 9.65.040. Proposed new stationary noise sources must comply with both Standard N-1 and Section 9.65.040.

[b] Noise levels generated from these sources are also subject to the land use noise standard of the receiving properties, where such a standard imposes a lower noise limit. For instance, while commercial noise levels of up to 75 dBA CNEL are allowed within a commercially zoned property, this commercial noise source must not exceed 65 dBA CNEL at any residential property boundary in the vicinity. The limit is applied at the receiving land use property line or (for residences in agriculture zones) at the boundary of the yard area.

Source: Lassen County General Plan 2021: Noise Element, Table 7.

Lassen County Municipal Code

Code Section– 9.65.040 General Sound Level Limits

(a) Except as provided in Sections 9.65.050, 9.65.060, and 9.65.070 of this chapter, it shall be deemed a public nuisance (Lassen County Code Chapter 1.18) for any person to cause or allow the creation of any noise, which exceeds the one-hour average sound level limits in Table 1 [recreated in Table 3.8-5], when the one-hour average sound level is measured at the property line of the property on which the noise is produced or at any location on a property that is receiving the noise. Any person violating any provision of the Lassen County Code, including the generation of noise in excess of the following sound level limits, may be issued an administrative citation by an enforcement officer as provided in this chapter, pursuant to Lassen County Code Chapter 1.20.

Table 3.8-5 Sound Level Limits in Decibels (dBA)

Zone	Time	One-Hour Average Sound Level Limits (dBA L_{eq})
(1) R-1, R-2, R-3, PUD, P-C, R-S, M-R, F-R, I-1, O-C-B, O-D, O-H, E-A, O-S, A-1, A-2, A-3, U-C, U-C-2, A-F.[1,2]	7:00 a.m. to 7:00 p.m. 7:00 p.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	65 60 55
(2) B-P, C-H, C-L, C-G, C-R, C-T, C-1, C-2, Y-C.[2]	7:00 a.m. to 7:00 p.m. 7:00 p.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	75 70 65
(3) M-L, M-1, M-2, M, H-R, T-P-Z	7:00 a.m. to 7:00 p.m. 7:00 p.m. to 7:00 a.m.	90 80

Notes: L_{eq} = equivalent continuous sound level.

[1] Within agriculture zones, noise exposure limit is applicable only to residences, at the residential yard boundary.

[2] These limits also govern the noise exposure level for a legal residence in any zone, applied at the residential yard boundary.

Source: Lassen County Municipal Code Section 9.65.040: Table 1 (2024).

Code Section – 9.65.040 General Sound Level Limits

(a) This chapter shall not apply to:

(8) Construction work conducted with a valid building permit between the hours of seven a.m. to seven p.m.

City of Susanville

City of Susanville has a general plan with an established land use compatibility chart. In addition, the Susanville Vicinity Area Plan (Lassen County 1984) provides noise standards consistent with the City of Susanville General Plan (see below). Lastly, the Susanville Code of Ordinances contains a general prohibition on "loud, unusual, penetrating or boisterous noise, disturbance, or commotion, which shall cause discomfort or annoyance to a reasonable person of normal sensitiveness" except for a period of no more than two hours between the hours of seven a.m. and nine p.m.

The project is proposed to be annexed by the City of Susanville and is subject to thresholds, policies, and regulations contained therein. Relevant policies and standards established are summarized below.

City of Susanville General Plan 1990

Susanville's General Plan was adopted in 1991 and the City is in the process of updating the various elements of the General Plan. As of mid-2025, the City has adopted updates to the Land Use, Circulation, and Housing Elements, and plans to update the remaining elements. Susanville's 1990 General Plan contains applicable land use compatibility standards, as seen in Table 3.8-6.

Table 3.8-6 City of Susanville Land Use Compatibility Standards

	Noise Levels (dBA, L_{dn} or CNEL)						
Land Use Category	50-55	55-60	60-65	65-70	70-75	75-80	80-85
Residential: Single-Family, Duplex, Mobile Home	NA	NA/CA	CA	CA	NU	CU	CU
Office Building, Business, Commercial and Professional	NA	NA	NA	NA/CA	CA	CA/NU	NU
Industrial, Manufacturing, Utilities, Agriculture	NA	NA	NA	NA	NA/CA	CA/NU	NU

Notes: dBA = A-weighted Noise Levels; L_{dn} = Day Night Average Noise Levels; CNEL = Community Noise Equivalent Level.

Table Legend:

Land Use Acceptability		Interpretation/Comments
NA	Normally Acceptable	Specific land use is satisfactory, based upon the assumption that any building involved are of normal conventional construction, without any special noise insulation requirements.
CA	Conditionally Acceptable	New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements I made and needed noise insulation features included in the design. Conventional construction, but with closed windows and trash air supply systems or air conditioning will normally suffice.
NU	Normally Unacceptable	New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included.
CU	Clearly Unacceptable	New construction or development should generally not be undertaken.

Noise Source-Characteristics:
The land use-noise compatibility recommendation should be viewed in relation to the specific source of the noise. For example, aircraft and railroad noise is normally made up of higher single noise events than auto traffic, but occurs less frequently. Therefore, different sources yielding the same composite noise exposure do not necessarily create the same noise environment.

Suitable Interior Environment:
One objective of location [both single and multi-family] residential units relative to known noise sources is to maintain a suitable interior noise environment at no greater than 45 dB CNEL or L_{dn}. The requirement, coupled with the measured or calculated noise reduction performance of the type of structure under consideration, should govern the minimum acceptable distance to a noise source.

Source: Susanville General Plan 1990: Table 9-7.

Relevant policies and action program items from the City of Susanville General Plan are as follows:

- **Policy bk.** The City shall require landscaped sound buffers, open space, or other mitigation between residential areas and facilities or areas that produce higher noise levels, such as freeways, commercial sites, and industrial developments. The buffers will be designed to achieve sound level reductions necessary to meet the land use compatibility criteria shown [above in Table 3.8.7].
- **Policy bl.** It shall be City policy to minimize the volume of traffic that passes residences.
- **Policy bm.** The City shall limit the· introduction or expansion of noise sources that exceed the desired noise levels established in the Susanville General Plan.
- **Policy bn.** The City shall establish local noise standards and enforce them.
- **Policy be.** The City shall require new commercial and industrial development to contribute financially to sound buffers where required. Soundwalls, densely vegetated areas, and open spaces reduce noise levels by buffering and distancing noise sources from sensitive areas. New commercial and industrial development will be required to contribute financially to sound buffers as may be required by the City to mitigate noise levels in accordance with the standards of [Table 3.8.7].
- **Policy bp.** Adopt the State of California noise compatibility standards for various land uses.
- **Policy bq.** Require acoustical studies for any new development in areas having an L_{dn} greater than acceptable for the land use proposed.
- **Policy bs.** Stipulate use of the current standard A-weighted sound levels for measuring noise.

- **Policy bt.** Require setbacks, walls, or other mitigation between noise-generating and noise-sensitive uses.
- **Policy bu.** Allow construction activities at normal activity levels, but limit them to times of the day or week when the number of persons occupying the potential noise impact zone is lowest.
- **Policy bv.** Utilize the natural shielding effects offered by topography to determine the phasing of construction.
- **Policy bw.** Require use of mufflers and require muffler maintenance on construction vehicles to meet EPA standards established under the Federal Noise Control Act of 1972 for new equipment.
- **Policy bx.** Require the placement of stationary construction equipment, such as compressors, as far as possible from developed areas, and require that acoustic shielding be used with such equipment.
- **Policy cb;** Require placement of fixed equipment, such as air conditioning units and condensers, inside (or within the walls of) new buildings, or on the rooftops of central units, in order to reduce noise Impacts on surrounding units.
- **Policy ce.** Limit the noise impact and duration of grading operations.
- **Action program [99]:** Adopt the State of California land use/noise compatibility standards shown [in Table 3.8.7].
- **Action program [100]**: Enact a noise ordinance to include the above policies for new and where applicable, existing development.

Susanville Vicinity Area Plan

Below is a summary of the Susanville Vicinity Area Plan, and its applicable policies pertaining to the project. The Susanville Vicinity Area Plan is a Lassen County Planning document from 1984, but it should be noted that the discussion of County planning documents is for informational purposes only, as the governing General Plan will be the City's General Plan upon annexation. In land use planning, care must be taken to ensure that an environment of noise compatibility exists within the community. Achieving this compatibility is accomplished by developing uses which respect the noise requirements of adjacent land uses. For example, noise sensitive land uses such as hospitals and schools should be kept away from noise generators.

- **Policy 3.1** The County shall protect noise sensitive land uses from existing or future noise generators by locating them within compatible noise environments or by requiring noise mitigation measures.

Susanville Municipal Code

Code Section – 9.04.060 Noise

A. Generally—Criteria for Judging. Except during permitted hours, as defined in the following subsections no person within the city shall make or cause the making of, or suffer or permit to be made, upon any premises, owned, occupied or controlled by such persons, any loud, unusual, penetrating or boisterous noise, disturbance, or commotion, which shall cause discomfort or annoyance to a reasonable person of normal sensitiveness.

B. The standards which shall be considered in determining whether a violation of this section exists shall include, but shall not be limited to, the following:

    1. The volume of the noise.
    2. The intensity of the noise.
    3. Whether the nature of the noise is usual or unusual.
    4. Whether the origin of the noise is natural or unnatural.
    5. The volume and intensity of the background noise, if any.
    6. The proximity of the noise to residential sleeping facilities.
    7. The nature and zoning of the area within which the noise emanates.
    8. The density of inhabitation of the area within which the noise emanates.

9. The time of the day or night the noise occurs.
10. The duration of the noise.
11. Whether the noise is recurrent, intermittent or constant.
12. Whether the noise is produced by a commercial or noncommercial activity.

C. Permitted Hours. The term "permitted hours" as used in the preceding subsection is defined to mean a single period of not more than two consecutive hours in any calendar day between the hours of seven a.m. and nine p.m.

D. Application of Provisions—Permits for Exceptions. The provisions of the preceding two subsections shall apply to all persons using public property, streets, places or ways for events utilizing sound amplifying equipment of any type or description, provided however, that a permit be issued authorizing noise prohibited by this section whenever it is found that the public interest will be served thereby. Applications for permits shall be in writing and shall be accompanied by an application fee in the amount of five dollars and shall set forth in detail facts showing that the public interest will be served by the issuance of such permit. Applications shall be made to the chief of police; provided however, with respect to work upon or involving the use of a public street, alley, building or other public place under the jurisdiction of the public works department, applications shall be made to the public works director. Any dissatisfied with the denial of a permit may appeal to the council.

E. Starting and Operating Motors. It is unlawful for any person within the city to start or operate, or cause to be started or operated, any gas, gasoline, kerosene, distillate, benzene, oil burning or other engine or motor within the city unless such engine or motor has a device thereunto attached, in good working order, which shall at all times be in constant operation, to prevent excess or unusual or annoying noise from the exhaust of such motor or engine.

F. Penalty for Violations. Any person violating the terms and provisions of subsection A, B, C or D of this section shall be guilty of a misdemeanor and upon conviction thereof, shall be punished by a fine of not more than $250 or by imprisonment in the county jail for not more than 30 days or by both such fine and imprisonment.

3.8.3 Environmental Setting

ACOUSTIC FUNDAMENTALS

Prior to discussing the noise setting for the project, background information about sound, noise, vibration, and common noise descriptors is needed to provide context and a better understanding of the technical terms referenced throughout this section.

Sound, Noise, and Acoustics

Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air) to a human ear. Noise is defined as loud, unexpected, annoying, or unwanted sound.

In the science of acoustics, the fundamental model consists of a sound (or noise) source, a receiver, and the propagation path between the two. The loudness of the noise source and obstructions or atmospheric factors affecting the propagation path to the receiver determines the sound level and characteristics of the noise perceived by the receiver. The field of acoustics deals primarily with the propagation and control of sound.

Frequency

Continuous sound can be described by frequency (pitch) and amplitude (loudness). A low-frequency sound is perceived as low in pitch. Frequency is expressed in terms of cycles per second, or hertz (Hz) (e.g., a frequency of 250 cycles per second is referred to as 250 Hz). High frequencies are sometimes more conveniently expressed in kilohertz, or thousands of hertz. The audible frequency range for humans is generally between 20 Hz and 20,000 Hz.

Sound Pressure Levels and Decibels

The amplitude of pressure waves generated by a sound source determines the loudness of that source. Sound pressure amplitude is measured in micro-Pascals (mPa). One mPa is approximately one hundred billionth (0.00000000001) of normal atmospheric pressure. Sound pressure amplitudes for different kinds of noise environments can range from less than 100 to 100,000,000 mPa. Because of this large range of values, sound is rarely expressed in terms of mPa. Instead, a logarithmic scale is used to describe sound pressure level (SPL) in terms of decibels (dB).

Addition of Decibels

Because decibels are logarithmic units, SPLs cannot be added or subtracted through ordinary arithmetic. Under the decibel scale, a doubling of sound energy corresponds to a 3-dB increase. In other words, when two identical sources are each producing sound of the same loudness at the same time, the resulting sound level at a given distance would be 3 dB higher than if only one of the sound sources was producing sound under the same conditions. For example, if one idling truck generates an SPL of 70 dB, two trucks idling simultaneously would not produce 140 dB; rather, they would combine to produce 73 dB. Under the decibel scale, three sources of equal loudness together produce a sound level approximately 5 dB louder than one source.

A-Weighted Decibels

The decibel scale alone does not adequately characterize how humans perceive noise. The dominant frequencies of a sound have a substantial effect on the human response to that sound. Although the intensity (energy per unit area) of the sound is a purely physical quantity, the loudness or human response is determined by the characteristics of the human ear.

Human hearing is limited in the range of audible frequencies as well as in the way it perceives the SPL in that range. In general, people are most sensitive to the frequency range of 1,000–8,000 Hz and perceive sounds within this range better than sounds of the same amplitude with frequencies outside of this range. To approximate the response of the human ear, sound levels of individual frequency bands are weighted, depending on the human sensitivity to those frequencies. Then, an "A-weighted" sound level (expressed in units of A-weighted decibels) can be computed based on this information.

The A-weighting network approximates the frequency response of the average young ear when listening to most ordinary sounds. When people make judgments of the relative loudness or annoyance of a sound, their judgment correlates well with the A-scale sound levels of those sounds. Thus, noise levels are typically reported in terms of A-weighted decibels. All sound levels discussed in this section are expressed in A-weighted decibels. Table 3.8-7 describes typical A-weighted noise levels for various noise sources.

Table 3.8-7 Typical A-Weighted Noise Levels

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	— 110 —	Rock band
Jet fly-over at 1,000 feet	— 100 —	
Gas lawn mower at 3 feet	— 90 —	
Diesel truck at 50 feet at 50 miles per hour	— 80 —	Food blender at 3 feet, Garbage disposal at 3 feet
Noisy urban area, daytime, Gas lawn mower at 100 feet	— 70 —	Vacuum cleaner at 10 feet, Normal speech at 3 feet
Commercial area, Heavy traffic at 300 feet	— 60 —	
Quiet urban daytime	— 50 —	Large business office, Dishwasher next room
Quiet urban nighttime	— 40 —	Theater, large conference room (background)
Quiet suburban nighttime	— 30 —	Library, Bedroom at night
Quiet rural nighttime	— 20 —	
	— 10 —	Broadcast/recording studio
Lowest threshold of human hearing	— 0 —	Lowest threshold of human hearing

Notes: dBA = A-weighted decibels.

Source: Caltrans 2013: Table 2-5.

Human Response to Changes in Noise Levels

The doubling of sound energy results in a 3-dB increase in the sound level. However, given a sound level change measured with precise instrumentation, the subjective human perception of a doubling of loudness will usually be different from what is measured.

Under controlled conditions in an acoustical laboratory, the trained, healthy human ear can discern 1-dB changes in sound levels when exposed to steady, single-frequency ("pure-tone") signals in the mid-frequency (1,000–8,000 Hz) range. In general, the healthy human ear is most sensitive to sounds between 1,000 and 5,000 Hz and perceives both higher and lower frequency sounds of the same magnitude with less intensity (Caltrans 2013:2-18). In typical noisy environments, changes in noise of 1–2 dB are generally not perceptible. However, it is widely accepted that people can begin to detect sound level increases of 3 dB in typical noisy environments. Further, a 5-dB increase is generally perceived as a distinctly noticeable increase, and a 10-dB increase is generally perceived as a doubling of loudness (Caltrans 2013:2-10). Therefore, a doubling of sound energy (e.g., doubling the volume of traffic on a highway) that would result in a 3-dB increase in sound would generally be perceived as barely detectable.

Vibration

Vibration is the periodic oscillation of a medium or object with respect to a given reference point. Sources of vibration include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) and those introduced by human activity (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous, (e.g., operating factory machinery) transient in nature (e.g., explosions). Vibration levels can be depicted in terms of amplitude and frequency, relative to displacement, velocity, or acceleration.

Vibration amplitudes are commonly expressed in peak particle velocity (PPV) or root-mean-square (RMS) vibration velocity. PPV and RMS vibration velocity are normally described in inches per second (in/sec) or in millimeters per second. PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV is typically used in the monitoring of transient and impact vibration and has been found to correlate well to the stresses experienced by buildings (FTA 2018:7-5, Caltrans 2013:6).

Although PPV is appropriate for evaluating the potential for building damage, it is not always suitable for evaluating human response. It takes some time for the human body to respond to vibration signals. In a sense, the human body responds to average vibration amplitude. The RMS of a signal is the average of the squared amplitude of the signal, typically calculated over a 1-second period. As with airborne sound, the RMS velocity is often expressed in decibel notation as vibration decibels (VdB), which serves to compress the range of numbers required to describe vibration (FTA 2018:7-4; Caltrans 2020:7). This is based on a reference value of 1 micro inch per second.

The typical background vibration-velocity level in residential areas is approximately 50 VdB. Ground vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration-velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels (FTA 2018:7-8; Caltrans 2013:27).

Typical outdoor sources of perceptible ground vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground vibration is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration-velocity level, to 100 VdB, which is the general threshold where minor damage can occur to fragile buildings. Construction activities can generate sufficient ground vibrations to pose a risk to nearby structures. Constant or transient vibrations can weaken structures, crack facades, and disturb occupants (FTA 2018:7-5).

Vibrations generated by construction activity can be transient, random, or continuous. Transient construction vibrations are generated by blasting, impact pile driving, and wrecking balls. Continuous vibrations are generated by vibratory pile drivers, large pumps, and compressors. Random vibration can result from jackhammers, pavement breakers, and heavy construction equipment.

Table 3.8-8 summarizes the general human response to different ground vibration-velocity levels.

Table 3.8-8 Human Response to Different Levels of Ground Noise and Vibration

Vibration-Velocity Level	Human Reaction
65 VdB	Approximate threshold of perception.
75 VdB	Approximate dividing line between barely perceptible and distinctly perceptible. Many people find that transportation-related vibration at this level is unacceptable.
85 VdB	Vibration acceptable only if there are an infrequent number of events per day.

Notes: VdB = vibration decibels referenced to 1 µ inch/second and based on the root mean square (RMS) velocity amplitude.

Source: FTA 2018:7-8.

Sound Propagation

When sound propagates over a distance, it changes in level and frequency content. The manner in which a noise level decreases with distance depends on the following factors:

Geometric Spreading

Sound from a localized source (i.e., a point source) propagates uniformly outward in a spherical pattern. The sound level attenuates (or decreases) at a rate of 6 dB for each doubling of distance from a point source. Roads and highways consist of several localized noise sources on a defined path and hence can be treated as a line source, which approximates the effect of several point sources, thus propagating at a slower rate in comparison to a point source. Noise from a line source propagates outward in a cylindrical pattern, often referred to as cylindrical spreading. Sound levels attenuate at a rate of 3 dB for each doubling of distance from a line source.

Ground Absorption

The propagation path of noise from a source to a receiver is usually very close to the ground. Noise attenuation from ground absorption and reflective-wave canceling provides additional attenuation associated with geometric spreading. Traditionally, this additional attenuation has also been expressed in terms of attenuation per doubling of distance. This approximation is usually sufficiently accurate for distances of less than 200 feet. For acoustically hard sites (i.e., sites with a reflective surface between the source and the receiver, such as a parking lot or body of water), no excess ground attenuation is assumed. For acoustically absorptive or soft sites (i.e., those sites with an absorptive ground surface between the source and the receiver, such as soft dirt, grass, or scattered bushes and trees), additional ground-attenuation value of 1.5 dB per doubling of distance is normally assumed. When added to the attenuate rate associated with cylindrical spreading, the additional ground attenuation results in an overall drop-off rate of 4.5 dB per doubling of distance. This would hold true for point sources, resulting in an overall drop-off rate of up to 7.5 dB per doubling of distance.

Atmospheric Effects

Receivers located downwind from a source can be exposed to increased noise levels relative to calm conditions, whereas locations upwind can have lowered noise levels, as wind can carry sound. Sound levels can be increased over large distances (e.g., more than 500 feet) from the source because of atmospheric temperature inversion (i.e., increasing temperature with elevation). Other factors such as air temperature, humidity, and turbulence can also affect sound attenuation.

Shielding by Natural or Human-Made Features

A large object or barrier in the path between a noise source and a receiver attenuate noise levels at the receiver. The amount of attenuation provided by shielding depends on the size of the object and the frequency content of the noise source. Natural terrain features (e.g., hills and dense woods) and human-made features (e.g., buildings and walls) can substantially reduce noise levels. A barrier that breaks the line of sight between a source and a receiver will typically result in at least 5 dB of noise reduction (Caltrans 2013:2-41; FTA 2018:5-6, 6-25). Barriers higher than the line of sight provide increased noise reduction (FTA 2018:2-12). Vegetation between the source and receiver is rarely effective in reducing noise because it does not create a solid barrier unless there are multiple rows of vegetation (FTA 2018:2-11).

EXISTING NOISE ENVIRONMENT

Existing Noise- and Vibration-Sensitive Land Uses

Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels, and because of the potential for nighttime noise to result in sleep disruption. These land use types are also considered vibration-sensitive land uses in addition to commercial and industrial buildings where vibration would interfere with operations within the building, including levels that may be well below those associated with human annoyance.

The project is bordered by State Route 36 (SR 36). The nearest noise-sensitive receptors are single family homes located approximately 980 feet south of the project site boundary, as measured from the center of the project site (i.e. the focal point of construction noise).[1]

Existing Noise Sources and Ambient Levels

To characterize the existing ambient noise environment at the project site, long-term (24-hour continuous) monitoring occurred on January 16 through January 17, 2025. The locations of the noise monitoring sites are shown in Figure 3.8-1. A Soft dB Piccolo II Type 2 precision integrating sound level meter was used for the ambient noise level measurement surveys. The meters were calibrated before use with Larson Davis Laboratories Model CAL200 acoustical calibrator to ensure measurement accuracy. The measurement equipment meets all pertinent specifications of the American National Standards Institute. The results of the ambient noise measurement survey are summarized in Table 3.8-9. Detailed summaries of the measured noise level data can be found in Appendix G.

Table 3.8-9 Summary of Existing Ambient Long-Term Noise Measurements

Location[1]	Long-Term Measurements Date and Time	Time of Day	Noise Level Descriptors (dBA) - L_{dn}	Noise Level Descriptors (dBA) - L_{eq}	Noise Level Descriptors (dBA) - L_{max}	Noise Level Descriptors (dBA) - L_{50}	Noise Level Descriptors (dBA) - L_{90}
LT-1	January 16, 2025, 1:00 p.m. to January 17, 2025, 12:00 p.m.	Day Average	54.5	52.7	67.3	50.8	45.6
		Night Average		46.5	61.1	43.6	39.5

Notes: LT = long-term; CNEL = community noise level equivalent; dBA = A-weighted decibel.

[1] Refer to Figure 3.8-1 for ambient noise level measurement locations.

In addition, the noise measurement site, LT-1, was conducted approximately 320 feet away from the nearest noise sensitive receptor. Noise sensitive receptors on Sierra Road are only accessible through a private driveway. Noise measurement at LT-1 was taken at a point as close as possible without trespassing. Based on observations conducted in the field, noise levels measured at LT-1 were seen to be equivalent to the noise level environment at the nearest sensitive receptor. Therefore, noise levels measured at LT-1 are considered similar or equivalent to the noise environment at the nearest noise sensitive receptor.

Source: Data collected by Ascent in 2025.

[1] In the following sections the reader is advised to note that the distances to the nearest noise sensitive receptor varies. Distances in this section are the distances from the property line of the sensitive land use/receptor and the proposed noise source. Distances therefore vary depending on the noise sources. For example, the construction noise assessment measures distance from the focal point of construction (the center of the project site), whereas the operational noise assessment considers the proposed location of noise generating equipment, such as the drive thru speaker equipment, location of heating, ventilation and air conditioning (HVAC) units, parking lot activity etc. The variations in distance are therefore intentional and not accidental.



Source: Adapted by Ascent in 2025.

Figure 3.8-1 Noise Measurement Location

3.8.4 Environmental Impacts and Mitigation Measures

METHODOLOGY

Construction Noise and Vibration

To assess potential short-term (construction-related) noise and vibration impacts, sensitive receptors and their relative exposure were identified. Project-generated construction source noise and vibration levels were determined based on methodologies, reference emission levels, and usage factors from FTA's *Guide on Transit Noise and Vibration Impact Assessment* methodology (FTA 2018) and FHWA's *Roadway Construction Noise Model User's Guide* (FHWA 2006). Reference levels for noise and vibration emissions for specific equipment or activity types are well documented and the usage thereof common practice in the field of acoustics.

Operational Noise and Vibration

With respect to non-transportation noise sources (e.g., stationary sources) associated with project implementation, the assessment of long-term (operational-related) impacts was based on reference noise emission levels and measured noise levels for activities and equipment associated with project operation (e.g., HVAC units, drive-thru, and parking lot activity), and standard attenuation rates and modeling techniques.

To assess potential long-term (operation-related) noise impacts due to project-generated increases in traffic, noise levels were estimated by using calculations consistent with the Federal Highway Administration's Traffic Noise Model Version 2.5 (FHWA 2004) and project-specific traffic data (Appendix H). The analysis is based on the reference noise emission levels for automobiles, medium trucks, and heavy trucks, with consideration given to vehicle volume, speed, roadway configuration, distance to the receiver, and ground attenuation factors. Truck usage and vehicle speeds on area roadways were estimated from field observations and the project-specific traffic report. Note that the modeling conducted does not account for any natural or human-made shielding (e.g., the presence of walls or buildings) or reflections off building surfaces.

THRESHOLDS OF SIGNIFICANCE

Thresholds of significance are based on Appendix G of the State CEQA Guidelines (as seen below), CEQA case law, noise policies and standards in the Lassen County General Plan, Lassen County Municipal Code, City of Susanville General Plan, City of Susanville Vicinity Area Plan, FTA vibration standards, and professional judgment.

The proposed project is located within unincorporated Lassen County on land that will be annexed into the City of Susanville. However, the nearest sensitive receptors that could potentially be affected by the project are located within Lassen County. Noise standards established by Lassen County are reasonable and appropriate thresholds for the determination of significance with respect to noise, as such Lassen County noise standards would be applied within the County's jurisdiction. Where multiple noise standards could apply, only the most stringent noise standard will be used for this analysis, as such if the project complies with the noise standards outlined below, the project is expected to comply with all other applicable noise standards. The proposed project would have a significant impact related to noise or vibration if it would:

Short-Term Construction Noise

- Expose off-site noise-sensitive receptors to excessive levels of construction noise for an extended period that exceeds the noise standards established by the FTA of 90 dBA L_{eq} during daytime hours and 80 dBA L_{eq} during nighttime hours;
- Generate a substantial temporary increase in ambient noise levels in the vicinity of the project site that causes adverse health effects (e.g., sleep deprivation);
- Generate a substantial increase (i.e., 5 dB) over ambient noise levels during the hours of 7:00 p.m. to 7:00 a.m. at off-site noise-sensitive receptors;

Short-Term Construction Vibration

- Construction-generated vibration levels exceeding FTA's maximum-acceptable-vibration standard with respect to human response (80 VdB for residential uses) and/or structural damages (0.2 PPV for typical residential uses) at nearby existing vibration-sensitive land uses;

Operational Transportation Noise at Off-Site Receptors

- Generate a substantial long-term increase in traffic-generated noise levels, defined by FICON standards as a 5 dB increase where existing ambient noise levels are less than 60 dBA, a 3 dB increase where existing ambient noise levels are between 60 dBA and 65 dBA, and a 1.5 dB increase where existing noise levels are above 65 dBA);

Operational Stationary Noise

- Generate stationary noise levels at adjacent sensitive uses property lines that exceeds the following noise standards established in the Lassen County General Plan:
  - Daytime 7:00 a.m. to 7:00 p.m.: 65 dBA L_{eq}
  - Evening 7:00 p.m. to 10:00 p.m.: 60 dBA L_{eq}
  - Nighttime 10:00 p.m. to 7:00 a.m.: 55 dBA L_{eq}
- Generate a substantial permanent increase in ambient noise levels in the vicinity of the project site, defined by FICON as a 5 dB increase where existing ambient noise levels are less than 60 dBA, a 3 dB increase where existing ambient noise levels are between 60 dBA and 65 dBA, and a 1.5 dB increase where existing noise levels are above 65 dBA);

Airport Land Use Compatibility

- Locate the project within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport, public use airport, or private airport exposing people residing or working in the project area to excessive noise levels;

Long-Term Operational Vibration

- Project-generated vibration levels exceeding FTA's maximum-acceptable-vibration standard with respect to human response (80 VdB for residential uses) and/or structural damages (0.2 PPV for typical residential uses) at nearby existing vibration-sensitive land uses;

ISSUES NOT DISCUSSED FURTHER

The closest public or private airport (Susanville Municipal Airport) is approximately 3.6 miles away from the proposed project. As such, the project would not expose people working on the project to excessive noise levels.

The implementation of the project would not introduce any major sources of long-term or permanent ground vibration such as commercial railways or passenger rail transit lines. Therefore, the project would not result in long-term substantial levels of ground vibration associated with project operations. This issue is not discussed further.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 3.8-1: Generate a Substantial Increase in Short-Term Construction Noise

Implementation of the project would result in construction activity near existing sensitive receptors (single family homes located approximately 980 feet south of the project site boundary). Most noise-generating construction activity would be performed during daytime hours (i.e., between 7:00 a.m. and 7:00 p.m. in accordance with Section 9.65.040 of the County Municipal Code, during which construction activity is exempt from County noise standards. Daytime construction-generated noise levels associated with the project would not result in a substantial increase over existing noise levels at nearby sensitive receptors, nor exceed daytime construction noise standards established by the FTA. Therefore, this impact would be **less than significant**.

On-site construction of the project, which includes the Travel Center components, would include site preparation, grading, underground activities, building construction, paving, and architectural coating. Additionally, a short demolition phase would be required to remove vegetation and any leftover footings from the barn building that previously occupied part of the site. Off-site construction of utility infrastructure to support planned operations would include gas and water lines along Skyline Road and a sanitary sewer along SR 36.

The project would result in a significant noise impact related to on-site construction if it would result in stationary construction-related activity exceeding the FTA's ambient noise standard of 90 dBA L_{eq} for single-family residential uses or if construction would occur between the hours of 7:00 a.m. and 7:00 p.m. Additionally, the impact would be considered significant if it would result in a substantial temporary or periodic increase in ambient noise levels exceeding 5 dB at sensitive receptors. As per Chapter 2 "Project Description," the construction associated with the project is expected to occur Monday through Friday during daytime hours (8:00 a.m. to 5:00 p.m.).

Construction-generated noise levels would fluctuate depending on the type, number, and duration of equipment used. The effects of construction noise largely depend on the type of construction activities occurring on any given day, noise levels generated by those activities, distances to noise sensitive receptors, and the ambient noise environment at nearby receptors. Types of heavy equipment that would be used for construction include air compressors, backhoes, compactors, concrete/industrial saws, excavators, paving equipment, forklifts, graders, rollers, scrapers, and water trucks. Noise emission levels from these types of construction equipment as well as other common equipment types are shown in Table 3.8-10, below. Reference noise levels are provided as maximum noise levels (i.e., L_{max}) based on studies and actual field measurements conducted, as referenced in FTA. These levels represent the highest sound levels recorded. In reality, noise from construction activities fluctuates considerably as a result of actual equipment use rates (i.e., load factor) in a given hour, and the specific construction activity taking place at any one moment. When evaluating construction noise impacts, FTA recommends the use of an hourly-average (i.e., L_{eq}) metric which accounts for these fluctuations in noise averaged over a given hour. In addition, FTA recommends that the two loudest pieces of equipment be evaluated assuming they operate at the same point in time and location on the site. As equipment moves around a construction site the noise source(s) can move closer or further from the receiver, changing how noise is perceived. And realistically, two pieces of equipment do not operate at the same location on the site, as that would be physically impossible. Applying the two loudest noise levels at one location ensures a conservatively high noise level, while using the L_{eq} metric most accurately characterizes how the construction equipment affects the ambient noise levels perceived by an offsite receiver during a worst-case hour of construction activities. Moreover, while instantaneous spikes in noise may occur, spikes in noise sources in a typical community also occur on a regular basis (e.g., ambulance siren, airplane flying over). These instantaneous noise spikes can be considered a nuisance; however, impacts from such sources are generally more likely when they cause sleep deprivation or awakenings as a result of the instantaneous startling effect of the short-term noise spike. For construction activities occurring throughout the daytime, perceived elevated average noise levels over longer periods of time lead to more annoyance at receivers. For example, a single loud bang might startle someone, but 60 minutes of sustained drilling is far more likely to interfere with daily life. In accordance with FTA's guidance, the construction noise analysis assumes the two loudest pieces of equipment (i.e. Concrete/Industrial Saw and Scraper) will be used through the construction of the project. (see Appendix G for detailed modeling).

Based on the modeled construction noise exposure levels detailed above, construction noise would attenuate to the FTA's residential daytime noise standard for construction noise of 90 dBA L_{eq} at a distance of 32 feet. No offsite residences or other noise-sensitive receptors are located within 32 feet of the project site or off-site utilities; thus, the FTA's applicable daytime noise standards for construction noise would not be exceeded during the on-site construction activities of the project.

Table 3.8-10 Typical Construction Equipment Noise Levels

Equipment	Noise Level at 50 feet (dBA L_{max})
Air compressor	78
Backhoe	78
Compactor	83
Concrete/industrial saw	90
Excavator	81
Forklift/Manlift	79
Grader	83
Paver	77
Roller	80
Scraper	84

Notes: Based on measured instantaneous noise levels (L_{max}) derived from the FHWA Road Construction Noise Model; dBA = A-Weighted Decibels

Source: FHWA 2006.

On-site construction noise would attenuate to 50.7 dB L_{eq} at the nearest sensitive receptor approximately 980 feet southwest of the project site as measured from the center of the project site. The combined noise from construction of 50.7 dBA L_{eq} and the existing ambient noise level at the nearest sensitive receptor of 52.7 dBA L_{eq} would result in a noise level of 54.8 dB L_{eq}. Therefore, the noise level at the nearest sensitive receptor would increase by approximately 2.1 dB during on-site construction activities. As discussed above, noise level increases of less than 3 dB are generally considered imperceptible to most humans and a 5 dB increase is considered distinctly perceptible. Therefore, project construction noise would not "cause discomfort or annoyance to a reasonable person of normal sensitiveness" as required by the City's Noise Ordinance. Additionally, all motorized construction equipment will have mufflers, and be in good working order, as required by the City's ordinance. Construction would be short-term and intermittent and would only occur during daytime hours; and thus, disturbances during hours when people would normally sleep would be minimal. Therefore, on-site construction activities associated with the project would not result in an increase in noise that results in adverse health effects (e.g., sleep deprivation) or a substantial increase (i.e., 5 dBA) in noise during the sensitive nighttime hours of the day.

Off-site construction would be short-term and intermittent and would only occur during daytime hours; and thus, disturbances during hours when people would normally sleep would be minimal. Therefore, off-site construction activities associated with the project would not result in an increase in noise that results in adverse health effects (e.g., sleep deprivation).

Summary

As detailed above, construction activities would be limited to the less noise-sensitive hours between 7:00 a.m. and 7:00 p.m. and thus would be exempt from the County's noise standards pursuant to Section 9.65.040 of the County Municipal Code, in accordance with Section 9.65.070(a)(8). Construction activities would also comply with the City's Noise Ordinance. In addition, the daytime construction activities would not exceed the FTA's construction noise standard or result in a permanent substantial increase in noise levels that would result in adverse health effects (e.g., sleep deprivation). Therefore, this impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 3.8-2: Generate a Substantial Increase in Off-Site Transportation Noise

Implementation of the project would result in an increase in daily trips on the adjacent roadway network. Based on the FICON noise threshold for substantial change, areas where the ambient noise level is below 60 dB, an increase of more than 5 dB would be substantial, for areas where ambient noise ranges from 60 to 65 dB an increase of 3 dB or greater would be substantial, and for areas where ambient levels exceed 65 dB, an increase of more than 1.5 dB would be considered substantial. Vehicle trips generated by the project would not result in a substantial increase over existing noise levels at off-site sensitive receptors. Therefore, this impact would be **less than significant**.

Project-generated vehicle trips associated with operation of the project would result in an increase in average daily traffic volumes and associated increases in traffic noise levels along affected roadway segments near the site. To analyze the impact of project-generated operational transportation noise sources, traffic noise levels under existing and existing-plus-project conditions were modeled for affected roadway segments. Refer to Appendix G for detailed noise modeling input parameters.

Table 3.8-11 summarizes the modeled traffic noise levels at the nearest applicable off-site receptors from the roadway centerlines of SR 36 and Skyline Road under existing and existing plus project conditions, along with the overall net change in noise level as a result of project-generated traffic. It should be noted that the implementation of the project would result in the extension of Skyline Road westward. Noise level data measured at LT-1 was used to quantify the existing noise environment at the proposed Skyline Road extension. Based on observations conducted in the field, noise levels at LT-1 are similar to noises levels at the nearest noise sensitive receptor.

As discussed above, existing vehicular volumes were obtained from project-generated vehicular volumes from the project-specific transportation study conducted. All model inputs and outputs are provided in Appendix G. Table 3.8-11 summarizes the traffic noise levels from the local roadway network under existing and existing-plus-project conditions.

Table 3.8-11 Summary of Modeled Traffic Noise Levels Under Existing and Existing-Plus-Project Conditions

Segment No.	Road Segment	From	To	Existing Conditions Noise Levels (dBA L_{dn})	Project Trips	Existing + Project Noise Levels (dBA L_{dn})	Modeled Change Relative to Existing Conditions (dBA)
1	SR 36	North of Skyline Road	Riverside Drive	61.6	3,050	61.7	0.9
2	SR 36	South of Skyline Road	Richmond Road	64.4	832	64.5	0.2
3	Skyline Road	East of SR 36	Johnstonville Road	50.9	370	51.6	0.8
4	Skyline Road	West of SR 36	Project Driveway B	54.5[1]	4,252	55.7	1.2

Notes: L_{dn} = day-night noise level; dBA = A-weighted decibel; N/A = Non-Applicable; SR = State Route

[1] Existing noise levels were estimated using noise level data measured at LT-1.

All modeling assumes average pavement, level roadways (less than 1.5 percent grade), constant traffic flow, and does not account for shielding of any type or finite roadway adjustments. All noise levels are reported as A-weighted noise levels. For additional details, refer to Appendix H for detailed traffic data, and traffic-noise modeling input data and output results.

Source: Data provided by Fehr & Peers 2025; modeled by Ascent in 2025.

As shown above, the maximum transportation noise increase would be 1.2 dB, which is considered an imperceptible increase in noise. Applying FICON's allowable incremental increase thresholds, existing noise levels on segments 1 and 2 are currently between 60 and 65 dBA, thus, the allowable increase threshold would be 3 dB and noise level increases on these segments are less than 1 dB. For segments 3 and 4, existing noise levels are less than 60 dBA, thus, the allowable increase threshold would be 5 dB and maximum increases on these segments would be 1.2 dB, which is below the allowable increase threshold of 5 dB. As such, implementation of the project would not result in a substantial increase in noise at off-site receptors. Therefore, this impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 3.8-3: Generate a Substantial Increase in Long-Term Stationary Operational Noise

The project would involve the long-term operation of new noise sources and new noise-generating activities on the project site. New operational stationary noise sources would include sources such as building HVAC systems, activity at proposed parking lots, and drive-thru noise. Based on noise attenuation modeling using reference noise levels, the operation of equipment and activities associated with the project would not exceed applicable noise standards at nearby receptors or create a substantial increase to the existing noise environment. Therefore, this impact would be **less than significant**.

Based on project site plans, implementation of the project would introduce new stationary noise sources. The stationary noise sources associated with the project would include mechanical equipment such as HVAC units, parking lot activities, and operational noise emanating from the drive thru equipment (i.e., speakers). Each source is discussed separately, below.

To evaluate increases in operational stationary noise sources associated with the project, the adopted exterior noise standards included in the Lassen County General Plan (Table 3.8-4) are used, as the potentially affected sensitive receptors are located in Lassen County. Per Chapter 2 "Project Description," the proposed project is expected to provide services for 24-hours through the day. As such, the daytime (7:00 a.m. to 7:00 p.m.) noise standard of 65 dBA L_{eq}, evening (7:00 p.m. to 10:00 p.m.) noise standard of 60 dBA L_{eq} and nighttime (10:00 p.m. to 7:00 a.m.) noise standard of 55 dBA L_{eq} would apply.

As detailed by FICON, a noise level increase of 5.0 dB, or greater, would typically be considered to result in increased levels of annoyance where existing ambient noise levels are less than 60 dB. Within areas where the ambient noise level ranges from 60 to 65 dB, increased levels of annoyance would be anticipated at increases of 3 dB, or greater. Increases of 1.5 dB, or greater, could result in increased levels of annoyance in areas where the ambient noise level exceeds 65 dB. As such, FICON's noise increases were applied to evaluate substantial increases in the existing noise environment due to project generated noise.

Mechanical Equipment

Implementation of the project would introduce new stationary noise sources associated with building mechanical equipment, primarily HVAC units. Commonly installed building equipment, such as HVAC systems, are located within the interior of the structure, on rooftops, or in direct line-of-sight to adjacent land uses. Detailed information regarding the stationary equipment models to be installed and their exact location is not currently available. As such, based on the preliminary site plan (Figure 2-3), in Chapter 2 Project Description, HVACs were assumed to be located adjacent to the proposed fast-food restaurant in line-of-sight with the adjacent residential receptor property boundary 600 feet to the south of the project site. Noise levels commonly associated with larger commercial-use air conditioning systems can reach levels of up to 78 dBA at 3 feet (Lennox 2020). Applying this reference noise level as an hourly average (L_{eq}) and assuming a 50 percent usage rate, commercial-use HVAC equipment would result in noise levels of 75 dBA L_{eq} at 3 feet from the source.

For the most conservative analysis, the proposed project is expected to install three commercial-use HVAC systems with a cumulative noise level of 79.5 dB L_{eq} at 3 feet (FTA 2018:201). Based on this reference noise level, from distance alone, noise from commercial HVAC units would attenuate to the County's daytime residential exterior noise standard of 65 dBA L_{eq} at 182 feet, the evening residential exterior noise standard of 60 dBA L_{eq} at 285 feet, and the nighttime exterior residential noise standard of 55 dBA L_{eq} at 445 feet (see Appendix G for detailed modeling). Regarding the potential noise increase from operation of HVAC equipment, the existing ambient noise levels measured at the nearest sensitive receptor within the project vicinity are approximately 52.7 dBA L_{eq}. The nearest noise-sensitive receptor's property line to the project site is located approximately 600 feet southwest of the closest potential location of HVAC equipment. At this distance, noise from HVAC units would attenuate to 51.6 dBA L_{eq}. At these distances, noise levels from the proposed commercial HVAC equipment would not exceed the County's noise standards. Therefore, noise generated from

mechanical equipment plus the existing noise levels would result in noise levels of 55.2 dBA $L_{eq,}$ resulting in an increase of 2.4-dB. Based on the existing noise levels measured at 52.7 dBA L_{eq}, a 5-dB increase would be the applicable FICON threshold. Therefore, HVAC equipment associated with the project would not result in a substantial increase in noise.

Parking Lot Activity

The commercial uses associated with the Project site would include on-site parking spaces, including 53 auto spaces, 5 RV spaces, 70 truck parking spaces and 10 overnight RV spaces. Parking lot activities generate various noise sources, including vehicular traffic-related noise, car doors closing/slamming, people talking, car alarms/radios sounding, and operation of the proposed fueling stations. Noise levels associated with parking lots tend to increase as hourly or daily vehicular traffic increases, thus, larger parking facilities typically generate more noise than smaller ones. Furthermore, as with any noise source, the closer the source to the receiver, the more audible the source is and if noise sources occur during the sensitive times of the day when background levels are lower, noise can be more audible and potentially disruptive to nearby receivers.

According to guidance from the FTA, noise generated by activity at surface parking lots located adjacent to off-site sensitive receivers varies depending on the rate of vehicle turnover, ranging from 44 to 53 dBA L_{eq} at 50 feet (FTA 2018). The project is expected to generate peak trips of 205 vehicles per hour, which would generate a noise level of 68.9 dBA L_{eq} at 50 feet. Parking lot noise would attenuate to the County's residential daytime, evening, and nighttime noise standards of 65 dBA L_{eq}, 60 dBA L_{eq}, and 55 dBA L_{eq} at 17 feet, 27 feet, and 43 feet, respectively. Regarding the potential noise increase from operation of the parking lot activities, the existing noise levels measured are approximately 52.7dBA L_{eq}. The nearest existing sensitive land use property boundary is located approximately 500 feet south from the closest parking lot. At this distance, noise from the surface parking lot would attenuate to approximately 43.2 dBA L_{eq}. Noise associated with the proposed parking lot would not exceed the applicable County noise standards. Therefore, noise generated from peak parking lot activity plus the existing noise levels would be 52.7 dBA L_{eq}, resulting in an increase of 0.0-dB. Based on the existing noise levels measured of 52.7 dBA L_{eq}, a 5-dB increase would be the applicable FICON threshold. Therefore, peak parking lot activities associated with the project would not result in a substantial increase in noise.

Drive-Thru

The project proposes the construction of two fast-food restaurants, the larger of which would be equipped with a drive-thru located at the southern portion of the project. Drive-thrus are commonly equipped with speaker posts and menu boards. Detailed information regarding the stationary equipment models to be installed and their exact location is not currently available. Approximate locations of drive-thrus were based on the preliminary site plan (Figure 2-3), in Chapter 2 Project Description. Noise levels commonly associated with drive-thru equipment can reach levels of up to 54 dBA at 54 feet (HME 2010). Applying this reference noise level as an hourly average (L_{eq}) and assuming a 50 percent usage rate, drive-thru equipment would result in noise levels of 51 dBA L_{eq} at 54 feet from the source.

Noise from drive-thru equipment would attenuate to the County's daytime residential exterior noise standard of 65 dBA L_{eq} at 15 feet, the evening residential exterior noise standard of 60 dBA L_{eq} at 24 feet, and the nighttime exterior residential noise standard of 55 dBA L_{eq} at 38 feet (see Appendix G for detailed modeling). Regarding the potential noise increase from operation of drive-thru equipment, the existing noise levels measured are approximately 52.7 dBA L_{eq}. The nearest noise-sensitive land use property boundary to the project site is located approximately 400 feet south from the closest potential location of drive-thru equipment. At this distance, noise from drive-thru units would attenuate to 28.6 dBA L_{eq} and would not exceed the County's residential daytime, evening, and nighttime noise standards of 65 dBA $L_{eq,}$ 60 dBA L_{eq}, and 55 dBA L_{eq}, respectively. Therefore, noise associated with the proposed drive-thru would not exceed the applicable County noise standards. Noise generated from drive-thru activity plus the existing noise levels would be 52.7 dBA L_{eq}, resulting in an increase of 0.0-dB. Based on the existing noise levels measured at 52.7 dBA L_{eq}, a 5-dB increase would be the applicable FICON threshold. Therefore, drive-thru equipment associated with the project would not result in a substantial increase in noise.

Combined Noise Levels

Project-related noise sources would generate noise levels ranging from 43.2 dBA L_{eq} to 51.6 dBA $L_{eq.}$ at the nearest sensitive land use's property line. The summation of the project noise levels would result in a combined project noise level of 52.2 dBA L_{eq} and would not exceed the County's residential daytime, evening, and nighttime noise standards of 65 dBA $L_{eq,}$ 60 dBA L_{eq}, and 55 dBA L_{eq}, respectively. Therefore, the collective noise associated with the proposed noise sources would not exceed the applicable County noise standards. Noise generated from the project of 52.2 dBA L_{eq} plus the existing noise levels of 52.7 dBA L_{eq} would result in a combined noise environment of 55.5 dBA L_{eq}, resulting in an increase of 2.8-dB. Based on the existing noise levels measured at 52.7 dBA L_{eq}, a 5-dB increase would be the applicable FICON threshold in which change would be considered substantial. Therefore, proposed noise sources associated with the project would not result in a substantial increase in noise.

Summary

The project operation would result in new stationary noise sources including on-site HVAC equipment, parking lot activity, and the proposed fast-food restaurants. As discussed above, noise from these uses would not exceed the applicable County residential daytime, evening, and nighttime noise standards of 65 dBA $L_{eq,}$ 60 dBA L_{eq}, and 55 dBA L_{eq}, respectively. Additionally, these sources would not result in a permanent substantial increase in noise levels that would result in adverse health effects (e.g., sleep deprivation) or prolonged exposure to noise that exceeds applicable standards. Therefore, this impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 3.8-4: Generate a Substantial Increase in Short-Term Construction Vibration

Project construction would result in short-term vibration from the use of heavy-duty equipment. The project would not involve ground vibration-intensive activities such as pile driving or blasting. The most vibration-intensive construction activity would occur with the use of a vibratory roller. The resultant vibration levels would not cause structural damage to nearby structures, nor would the threshold for human annoyance (i.e., 80 VdB) be exceeded at nearby sensitive land uses. For these reasons, people would not be exposed to excessive groundborne vibration levels. This impact would be **less than significant**.

No pile driving or blasting would be conducted as part of project construction. Typical construction activities would use pieces of equipment that generate low levels of ground vibration, such as dozers and pavers. These types of common construction equipment do not generate substantial levels of ground vibration that could result in structural damage, except at extremely close distances (i.e., within 10 feet). The most ground vibration-intensive activity that could be performed during construction phases would be the use of a vibratory roller during soil compaction and roadway construction. Unlike construction noise levels, which are often measured from the center of the construction site, vibration levels are measured from the site of the vibration source. Therefore, in this analysis, vibration levels are modeled based on the distance between the location where a vibratory roller could be used and the nearest structure.

Vibratory rollers generate ground vibration levels of 0.210 in/sec PPV and 94 VdB at 25 feet (FTA 2018: 184). Vibration from construction activities would exceed the significance threshold for structural damage within 26 feet and the threshold for human annoyance of 80 VdB within 73 feet of activities. The nearest structures are located approximately 700 feet southwest of where the use of a vibratory roller could occur (i.e., for soil compaction at the proposed parking lot). Thus, vibration from construction activity would not exceed the threshold for structural damage (i.e. 0.210 in/sec PPV) and the threshold for human annoyance (i.e., 80 VdB) at nearby sensitive land uses. In addition, construction would occur during daytime hours, and would avoid hours in which people normally sleep. For these reasons, people would not be exposed to excessive groundborne vibration levels and this impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

3.9 TRANSPORTATION

This section describes the applicable federal, state, and local transportation regulations and policies; discusses the existing roadway network and transportation facilities in the vicinity of the project area; and analyzes the potential transportation impacts associated with implementation of the project. Information contained within this section was provided primarily in the Transportation Impact Analysis Report prepared for the project (Fehr & Peers 2025), which is included as Appendix H of this EIR and incorporated herein.

No comments regarding transportation were received in response to the Notice of Preparation. All comments received in response to the Notice of Preparation are presented in Appendix A.

3.9.1 Regulatory Setting

FEDERAL

Federal Highway Administration

The Federal Highway Administration (FHWA) is an agency of the US Department of Transportation and provides stewardship over the construction and preservation of the nation's highways, bridges, and tunnels. FHWA also provides technical assistance to state and local agencies to improve safety, mobility, and livability, and to encourage innovation in these areas. FHWA also provides regulation and guidance related to work zone safety, mobility, and temporary traffic control device implementation.

Surface Transportation Assistance Act

The Surface Transportation Assistance Act (STAA) of 1982 allows large trucks to operate on the interstate and certain primary routes that are collectively called the National Network. These trucks, referred to as STAA trucks, are longer than California legal trucks and have a larger turning radius than most roadways can accommodate. On surface streets, STAA routes are designated as either Terminal or Service Access routes. Terminal routes are approved by the agency with jurisdiction over the roadway to enable the truck to reach its ultimate destination. Service Access routes allow STAA trucks to exit the interstate onto a local roadway for up to 1 mile to access food, fuel, lodging, or repairs.

Federal Motor Carrier Safety Administration

The Federal Motor Carrier Safety Administration (FMCSA) has established policies that relate to the hours of service for truck drivers and indirectly influence the project's travel behavior. The following regulations apply to truck drivers transporting property:

- They may drive a maximum of 11 hours after 10 consecutive hours off duty.
- They may not drive beyond the 14th consecutive hour after coming on duty, following 10 consecutive hours off duty. Off-duty time does not extend the 14-hour period.
- They must take a 30-minute break when they have driven for a period of 8 cumulative hours without at least a 30-minute interruption. The break may be satisfied by any non-driving period of 30 consecutive minutes (i.e., on-duty not driving, off-duty, sleeper berth, or any combination of these taken consecutively).
- They may not drive after 60/70 hours on duty within 7/8 consecutive days. A driver may restart a 7/8 consecutive day period after taking 34 or more consecutive hours off duty.

The key takeaways from these policies are that truck drivers must take breaks after a certain number of consecutive hours driving and that there are limits on continuous driving between breaks. This applies to trucks on State Route (SR) 36 within the vicinity of the project where there are no existing large truck stops for some distance from the project site.

STATE

California Department of Transportation

The California Department of Transportation (Caltrans) is the state agency responsible for the design, construction, maintenance, and operation of the California State Highway System, as well as the segments of the Interstate Highway System within California. Caltrans District 2 is responsible for the operation and maintenance of highways in the project area, including SR 36 located east of the project site. Caltrans requires a transportation permit for any transport of heavy construction equipment or materials that necessitates the use of oversized vehicles on State highways, and an encroachment permit for any work within Caltrans right-of-way. Caltrans has established the following guidance related to the function of State roadways that are relevant to the project.

California Manual on Uniform Traffic Control Devices, Part 6: Temporary Traffic Control

The California Manual on Uniform Traffic Control Devices (CA MUTCD), Part 6: Temporary Traffic Control provides principles and guidance for the implementation of temporary traffic control to ensure the provision of reasonably safe and effective movement of all roadway users (e.g., motorists, bicyclists, pedestrians) through or around temporary traffic control zones while reasonably protecting road users, workers, responders to traffic incidents, and equipment. In addition, this document notes that temporary traffic control plans and devices shall be the responsibility of the public body or official having jurisdiction to guide road users (Caltrans 2024: 1029).

Local Development Review Safety Review Practitioners Guidance

The Local Development Review (LDR) Safety Review Practitioners Guidance (Guidance) advised practitioners how to evaluate project-related safety impacts on the state highway system. The LDR Guidance prioritizes vulnerable roadway users and underserved communities; enhances safety for pedestrians, bicyclists, transit, and vehicular modes; and applies both reactive and system perspectives (Caltrans 2024). Although the LDR Guidance is intended to be used for projects affecting the state highway system, it can also be used by lead agencies, developers, and consultants as a model for analyzing the safety impacts of proposed land use projects and plans on local roadways. The guidance supports the shift away from using Highway Capacity Manual Level of Service (LOS) as a metric of analysis under the California Environmental Quality Act (CEQA), in accordance with implementing Senate Bill 743.

Encroachment Permits Manual

The Caltrans Encroachment Permits Manual provides information on the permitting process, describes departmental policies, and maintains uniform methods and procedures related to the issuance of encroachment permits. Section TR-0045 of the Encroachment Permits Manual describes the general provisions of a Caltrans encroachment permit including standards of construction and requirements for public traffic control (Caltrans 2025a).

VMT-Focused Transportation Study Impact Guide

The Caltrans VMT-Focused Transportation Impact Study Guide was prepared to provide guidance to Caltrans districts, lead agencies, tribal governments, developers, and consultants regarding Caltrans review of a land use project or plan's transportation analysis using a VMT metric. The Transportation Impact Study Guide is intended to be a reference and informational document, and its guidance is not binding on public agencies (Caltrans 2020: 3).

California Fire Code

The 2022 California Fire Code, which is codified at Part 9 of Title 24 of the California Code of Regulations (CCR), incorporates by adoption the 2021 International Fire Code and contains regulations related to construction, maintenance, access, and use of buildings. Topics addressed in the California Fire Code include design standards for fire apparatus access (e.g., turning radii, minimum widths), standards for emergency access during construction, provisions intended to protect and assist fire responders, and several other general and specialized fire-safety requirements for new and existing buildings and the surrounding premises. The California Fire Code contains specialized technical regulations related to fire and life safety. The California Building Standards Code, including the California Fire Code, is revised and published every 3 years by the California Building Standards Commission.

California Code of Regulations Section 15064.3

On December 28, 2018, State CEQA Guidelines Section 15064.3 was introduced to address the determination of significance for transportation impacts. This amendment mandates that transportation analyses be based on VMT rather than congestion metrics, such as level of service. The shift in focus was a direct response to legislation, Senate Bill (SB) 743, passed in 2013, that required the Governor's Office of Planning and Research (OPR) (now known as the Governor's Office of Land Use and Innovation [LCI]) to develop new State CEQA Guidelines that address traffic metrics under CEQA. As stated in the legislation, upon adoption of the new guidelines, "automobile delay, as described solely by level of service (LOS) or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment pursuant to this division, except in locations specifically identified in the guidelines, if any."

Following approval by the Office of Administrative Law in late 2018, section 15064.3 required that all agencies in the state focus on VMT to the exclusion of LOS by no later than July 1, 2020. Consistent with CEQA Guidelines Section 15007[b], the new requirement applied prospectively from that date to "steps in the CEQA process not yet undertaken" for individual projects (e.g., the release of a Draft EIR). As a result, VMT analysis has become a crucial component of project evaluations under CEQA. Therefore, VMT is considered in the analysis of this project.

In December 2018, OPR published the most recent version of the Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory), which provides guidance for VMT analysis. The OPR Technical Advisory provides guidance related to screening thresholds for small projects to indicate when detailed analysis is needed or if a project can be presumed to result in a less-than-significant VMT impact. The OPR Technical Advisory notes that projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact, absent substantial evidence indicated otherwise (OPR 2018). Section 15064.3(b)(3), Qualitative Analysis, states that if existing models or methods are not available to estimate the VMT for the particular project being considered, a lead agency may analyze the project's VMT qualitatively. Regarding retail projects, the Technical Advisory recommends that generally, "lead agencies should analyze the effects of a retail project by assessing the change in total VMT because retail projects typically re-route travel from other retail destinations. A retail project might lead to increases or decreases in VMT, depending on previously existing retail travel patterns" (OPR 2018). The "change in total VMT" method includes evaluation of a project's likelihood of diverting existing trips and the effect of such diversion on total VMT. The Technical Advisory also recommends that the "analysis should address the full area over which the project affects travel behavior, even if the effect on travel behavior crosses political boundaries."

The Technical Advisory also acknowledges that significance thresholds may be best determined on a case-by-case basis in rural areas. In setting thresholds for unique land use types or specific projects, the Technical Advisory recommends that "lead agencies should consider the purposes described in section 21099 of the Public Resources Code and regulations in the CEQA Guidelines on the development of thresholds of significance (e.g., CEQA Guidelines, Section 15064.7)."

LOCAL

Lassen County Regional Transportation Plan

The Lassen County Transportation Commission (LCTC) is the designated Regional Transportation Planning Agency for Lassen County. The Lassen County Regional Transportation Plan (RTP) serves as the planning blueprint to guide transportation investments in the county over a 20-year horizon (LCTC 2023). The RTP provides a vision of the regionally significant transportation improvements and policies needed for the efficient movement of goods and people within the region.

Lassen County General Plan

The General Plan serves as a blueprint for development and associated improvements in the county. The Circulation Element sets goals and establishes policies to maintain and improve the County transportation network. The following Circulation Element policies are applicable to the project (Lassen County 1999):

- **CE10 Policy:** In consideration of proposed projects which would generate a substantial number of large trucks carrying heavy loads, the County shall require special mitigation measures to ensure that those projects do not cause, or will adequately mitigate, significant deterioration of County roads.
- **CE13 Policy:** Because the safety and efficiency of traffic on State Route 36 and Main Street through the City of Susanville affects everyone who lives in, works in, and travels through that area of Lassen County, the County encourages continuing efforts by the Lassen County Transportation Commission, Caltrans and the City of Susanville to resolve safety problems and the poor and deteriorating level of service on this portion of the highway.
- **CE27 Policy**: When projects are planned, and where a direct nexus between growth and development and the need for trails and pathways is determined, developers should be required as a condition of project approval to contribute to the development of previously identified public trail projects.

Lassen County Active Transportation Plan

The Lassen County Active Transportation Plan aims to enhance walking, biking, and multimodal mobility throughout the county and identifies priority infrastructure improvements and programs that have the potential to increase the safety, access, and health of residents (LCTC 2022a). The following Active Transportation Plan policies are applicable to the project:

- **Policy 2.1:** Require future development to construct and dedicate bikeways included in the proposed bikeway system as a condition of development. The bikeways should provide connectivity between new development and the proposed bikeway system.
- **Policy 2.2**: Require future commercial development to provide bicycle access to surrounding residential areas when a nexus can be demonstrated between the development and potential bicycle travel to and from the residential areas.
- **Policy 2.3:** Require future non-residential development to place bike racks near entrances.

Lassen County Local Roadway Safety Plan

The Lassen County Local Roadway Safety Plan (LRSP) includes a detailed analysis of traffic crash data throughout the county. The LRSP sets forth a series of project-level improvements as well as programmatic safety strategies to improve roadway safety within the county (LCTC 2022b). The LRSP does not present any data or analysis on SR 36 or Skyline Road.

City of Susanville General Plan

The City of Susanville General Plan was developed in 1990 and most recently updated in 2024. The Circulation Element, as updated in March 2024, provides a management and improvement framework for transportation-related infrastructure over a 20-year horizon. The strategies included in the Circulation Element aim to improve quality of life, accommodate new growth, and promote a safe and efficient transportation network (City of Susanville 2024). The following policies from the Circulation Element are applicable to the project:

- **CIR-1.4 Safety.** Safety shall be a priority when planning and designing transportation infrastructure improvements in the City of Susanville. All improvements should include industry accepted safety measures for intersections and roadways.
- **CIR-1.11 Complete Streets.** Create transportation enhancements in the city that prioritize "complete streets" designs, allowing for easy and safe access for all users, particularly those who prefer or rely on walking, cycling, and transit.
- **CIR-1.14 SR 36 Expressway.** Continue to encourage and support the improvement of SR 36 from Susanville to Johnstonville as a four-lane expressway.

- CIR-5.2 Enhancing Safety. Develop a bikeway system that enhances the safety and convenience of bicycling or walking to work or school. This should include making improvements to crossing protections at major intersections.
- CIR-5.4 Universal Design: Require pedestrian facilities to be ADA compliant and accessible for people of all abilities.
- CIR-5.5 Regional Connections: Include routes in the bikeway system that connect Susanville to existing or planned bikeways in surrounding counties.
- CIR-6.3: Bicycle Facilities: Support provision of parking, shelters, and off-street facilities, where feasible and practical, to promote bicycle and pedestrian travel. Require future developments that might experience a high bicycle demand, such as commercial areas, parks, libraries, and schools, to support these facilities.
- CIR-7.1 Main Street Access: Enhance pedestrian access to and use of Main Street.
- CIR-7.4 Pedestrian Crossings: Enhance the safety of local intersections by pursuing signage and overhead pedestrian crossing especially along Main Street.
- CIR-9.1 Minimize Conflicts: Minimize the potential conflicts on designated truck routes between trucks and pedestrians, cyclists, or transit travel.

Susanville Vicinity Area Plan and Environmental Impact Report - Circulation

In addition to and as part of the County's General Plan, Lassen County has adopted several Area Plans, including the Susanville Vicinity Area Plan and Environmental Impact Report (Area Plan) to guide development in unincorporated areas around the City. The Area Plan was adopted in 1984 and contains the following circulation policies and implementation measures relevant to the Project:

- 20.2 Proposed circulation routes indicated on the land use map are for general planning purposes and are not intended to show exact alignments at this time. Actual routes, as engineered, should be located in a manner substantially consistent to the routes indicated.
  - Implementation

    20.12 Priority for construction shall be given to those roads designed to improve the efficiency, safety and quality of existing facilities. Priority shall also be given to the extension of Sierra Street to Highway 36 to facilitate the development of the industrial area.

    20.13 New road construction in the planning area shall be closely coordinated with the City of Susanville.

    20.16 Prior to the construction of new roads, the County and City should evaluate their potential effect on existing traffic patterns and should take any steps necessary to ensure traffic safety.

    20.17 Encroachments onto State Highways and Thoroughfare routes should be limited and carefully placed to prevent congestion. Developers should utilize existing public connections when feasible and develop frontage roads to minimize the number of additional connections.

City of Susanville Municipal Code

The City of Susanville Municipal Code contains standards and regulations applicable to the project. Section 15 of the City Municipal Code adopts the 2022 California Fire Code by reference including standards for emergency access during construction and operations. Section 17.96 of the Municipal Code establishes general development standards including those related to sight distance and pedestrian access.

3.9.2 Environmental Setting

This section describes the existing environmental setting, which is the baseline scenario upon which project-specific impacts are evaluated. The environmental setting for transportation includes baseline descriptions for roadway, bicycle, pedestrian, and transit facilities.

ROADWAY SYSTEM

The project area includes a network of state, county, and city roadways. The FHWA classifies urban and rural roadways by road function. The functional classification of roadways defines the role each element of the roadway network plays in serving the transportation system (FHWA 2023). FHWA defines each roadway classification as follows:

- **Interstates**: Interstates are the highest classification of arterials and were designed and constructed with mobility and long-distance travel in mind.
- **Other Freeways & Expressways**: Roadways in this functional classification category look very similar to interstates. While there can be regional differences in the use of the terms 'freeway' and 'expressway', for the purpose of functional classification the roads in this classification have directional travel lanes, are usually separated by some type of physical barrier, and their access and egress points are limited to on- and off-ramp locations or a very limited number of at-grade intersections.
- **Other Principal Arterials**: These roadways serve major centers of metropolitan areas, provide a high degree of mobility, and can also provide mobility through rural areas. Unlike their access-controlled counterparts, abutting land uses can be served directly.
- **Minor Arterials**: Minor arterials provide service for trips of moderate length, serve geographic areas that are smaller than their higher arterial counterparts, and offer connectivity to the higher arterial system. In an urban context, they provide intra-community connectivity and may carry local bus routes. In rural settings, minor arterials are typically designed to provide relatively high overall travel speeds, with minimum interference to through movement.
- **Major and Minor Collectors**: Collectors serve a critical role in the roadway network by gathering traffic from local roads and funneling them to the arterial network.
- **Local Roads**: Locally classified roads account for the largest percentage of all roadways in terms of mileage. They are not intended for use in long distance travel, except at the origin or destination end of the trip, due to their provision of direct access to abutting land (FHWA 2023).

Existing Roadways

The following roadways are located within the vicinity of the project site. Figure 3.9-1 displays the functional classification and number of lanes on roadways in the project vicinity.

- **SR 36/Main Street** is designated as a principal arterial roadway and serves as the main street through the City of Susanville. North of Riverside Drive, SR 36 is a four-lane median divided highway featuring a two-way left-turn lane. South of Riverside Drive and between Skyline Road, SR 36 narrows from four lanes to a two-lane undivided highway. South of Skyline Road, SR 36 is a two-lane undivided highway that includes an approximately 1.7-mile section within which passing is permitted. There is an approximately 500-foot Class II bike lane striped between the through and right-turn lanes on SR 36. It consists of pavement markings, but no signage. The bike lane begins approximately 500 feet south of the SR 36/Skyline Road intersection and does not continue beyond the intersection.
- **SR 139 (Ash Street)** is a minor arterial roadway that begins at SR 36 where it is known as Ash Street. The roadway extends north as a two-lane undivided roadway through the City of Susanville and into the unincorporated county.



Source: Adapted by Ascent in 2024.

Figure 3.9-1 Existing Roadways

- **Skyline Road** is a two-lane minor arterial roadway that begins at SR 36 and extends northeast for approximately 2.5 miles to SR 139. It continues beyond SR 139 for approximately 1.3 miles, terminating at Paiute Lane. There is a Class I bicycle lane along the north/west side of Skyline Road between SR 36 and SR 139. Skyline Road would provide direct access to the project site.
- **Riverside Drive** is a two-lane minor arterial that extends from SR 36 at the southern edge of Downtown Susanville to Richmond Road.

Truck Routes

Caltrans has identified US Route 395, SR 36, and SR 44 in Lassen County as Surface Transportation Assistance Act (STAA) terminal access routes (Caltrans 2023), which are routes approved by the agency with jurisdiction over the roadway to enable a truck to reach its ultimate destination. In addition, the 10-mile segment of SR 36 between SR 44 (west of Susanville) and US 395 (east of Susanville) is an important truck route corridor that provides access to local cities such as Susanville. It is the preferred route that long-distance trucks use to travel between Reno and Redding. It also allows trucks to access local cities/communities such as Susanville, Johnstonville, Westwood, and Chester.

SR 139 north of SR 36 is a 65-foot California Legal Truck Route with a 30-foot Kingpin to Rear Axle (KPRA) (i.e., maximum distance from kingpin to rear axle). There are no restrictions on the use of Skyline Road by trucks, though it is not posted as a STAA route.

TRANSIT SYSTEM

The Lassen Transit Service Agency (LTSA) provides public transportation services in Lassen County. LTSA operates the Lassen Rural Bus System which provides local and inter-community bus routes and paratransit and dial-a-ride services (LTSA 2025a). The nearest bus stop to the project site serves the Susanville City Route and the West County Commuter Route and is located within the Safeway Shopping Center, approximately 0.4 miles north of the project site. The Susanville City Route is a looped route between Riverside Drive and the Safeway Shopping that runs Monday through Friday between 7:00 a.m. and 7:00 p.m. and Saturdays between 8:00 a.m. and approximately 4:00 p.m. (LSTA n.d.) The West County Commuter Route provides round-trip service between Susanville and Chester three times per day on weekdays and twice on Saturdays (LTSA 2025b).

LTSA also has agreements with Lassen Senior Services and Big Valley 50 Plus to serve senior transportation needs. Other services in Lassen County include paratransit and dial-a-ride services.

BICYCLE AND PEDESTRIAN SYSTEM

Lassen County and the City of Susanville provide bicycle facilities along several roadways within their jurisdictions. Caltrans classifies bicycle facilities into the following types (Caltrans 2025b):

- **Class I Shared-Use Paths**: Paths completely separated from motor vehicle traffic used by people walking and biking, making them comfortable for people of all ages and abilities. Typically located immediately adjacent and parallel to a roadway or in its own independent right-of-way.
- **Class II Bicycle Lanes**: A dedicated lane for bicycle travel adjacent to traffic. A painted white line separates the bicycle lane from motor vehicle traffic.
- **Class III Signed Bicycle Routes**: Streets with signs and/or pavement markings that indicate people biking share the travel lane with motor vehicles.
- **Class IV Bikeways**: A bikeway for the exclusive use of bicycles and includes a separation between the separated bikeway and the through vehicular traffic. The separation may include, but is not limited to, grade separation, flexible posts, inflexible barriers, or on-street parking.

The following bicycle facilities are located within the vicinity of project site and shown in Figure 3.9-2.

- Skyline Road Class I Multi-use Path runs along the north/west side of Skyline Road between SR 36 and SR 139.
- Northbound SR 36 Class II Bicycle Lane is an approximately 500-foot Class II bike lane striped between the through and right-turn lanes. It consists of pavement markings, but no signage. The bike lane begins approximately 500 feet south of the SR 36/Skyline Road intersection and does not continue beyond the intersection.

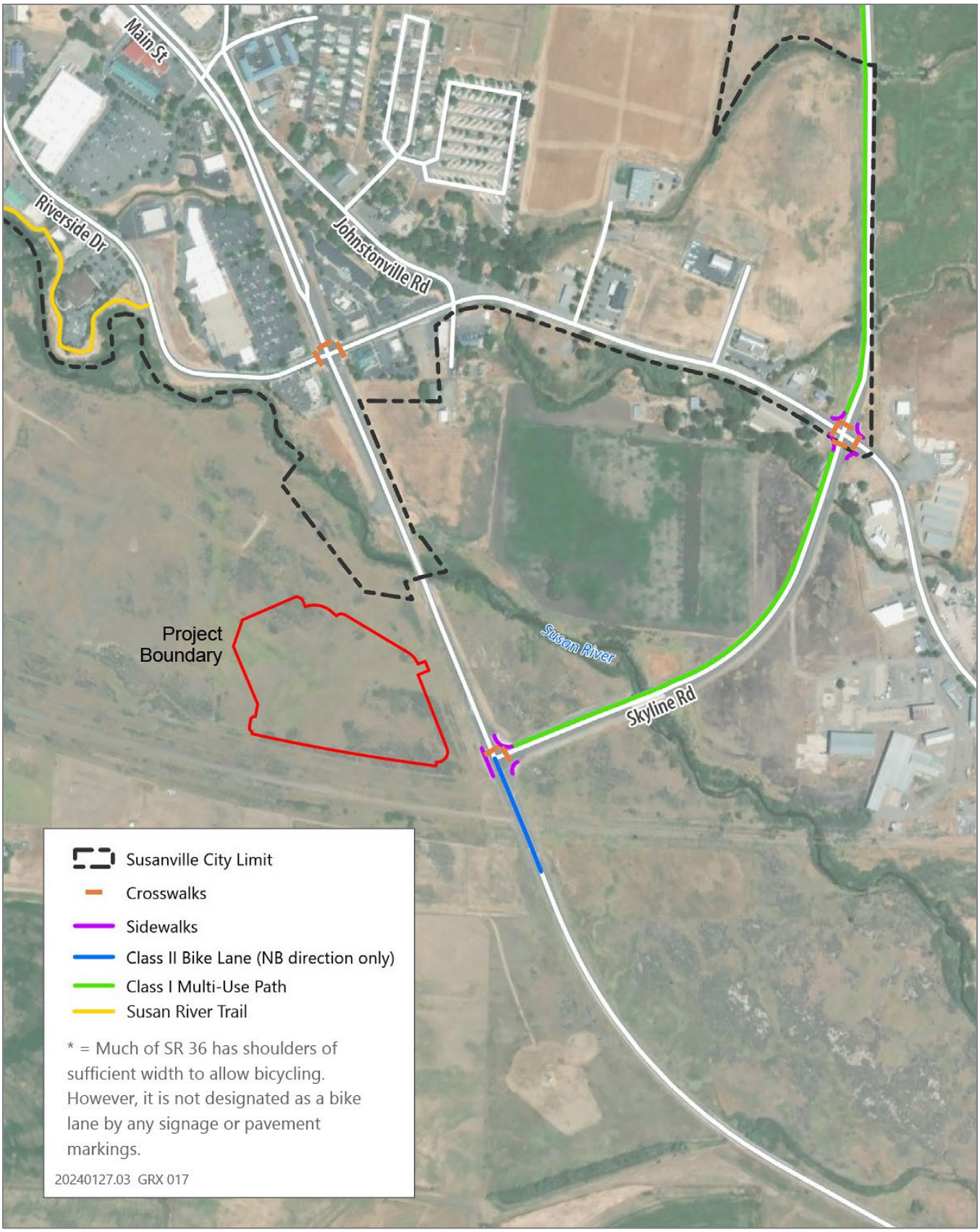
Other notable trails in the surrounding area include the Susan River Trail and the Bizz Johnson National Recreation Trail. There is a "Share the Road" sign on southbound SR 36 south of Riverside Drive. No such signs are present elsewhere in the SR 36 corridor. There are crosswalks on the north and east portions of the SR 36/Skyline Road intersection. Both crosswalks have pedestrian push button activation, an accessible pedestrian signal that provides audible guidance, and Americans with Disabilities ramps.

The Lassen County Active Transportation Plan proposes several bicycle and pedestrian improvements within the vicinity of the project site, including the extension of the existing Class I bicycle path from Johnstonville Road to the Bizz Johnson Trail and Class I or Class II bicycle facilities from Richmond Road to SR 36 (LCTC 2022a: 39).

3.9.3 Project Design Features

The analysis of environmental impacts on transportation focuses on the potential for substantial adverse effects on the circulation system including transit, roadways, bicycle facilities, and pedestrian facilities; VMT; transportation hazards; and emergency access. Significance determinations account for the influence of relevant Project Design Features (PDFs), which are listed below.

- PDF-TR-1: Construction Management and Traffic Plan. A Construction Management and Traffic Plan (CMTP) will be developed by the contractor and approved by the City of Susanville to alleviate potential construction period impacts. The CMTP would include but not necessarily be limited to:
  - name and telephone number of a contact person regarding traffic complaints or emergency situations;
  - community notification procedures and contact information for local police, fire, and emergency response organizations and procedures for the continuous coordination of construction activity;
  - procedures for training the flag person(s) used in implementing the plan;
  - the location, times, and estimated duration of any temporary lane closures;
  - developing, and once approved, managing the haul route plan and construction parking management plan;
  - timing of disruptive construction activities;
  - scheduling of deliveries, pick-ups and hauling of material during non-peak travel periods to the extent possible;
  - the contractor will provide an estimate of truck volume and schedule. Areas will be designated by the City for the staging of all trucks. All earth-moving and ready-mix trucks will be equipped with two-way radios so that the drivers at the staging areas are linked to a person controlling traffic at the project site. Trucks will follow a City-approved route to the project site.



Source: Adapted by Ascent in 2024.

Figure 3.9-2 Existing Pedestrian and Bike Facilities

3.9.4 Environmental Impacts and Mitigation Measures

This section describes the analysis techniques, assumptions, and results used to identify potential significant impacts of project implementation on the transportation system. Transportation impacts are described and assessed, and mitigation measures are recommended for impacts identified as significant or potentially significant.

METHODOLOGY

The following methodologies were used to evaluate potential impacts of the project.

Bicycle and Pedestrian Analysis

The bicycle and pedestrian analyses evaluate whether implementing the project would, either directly or indirectly, disrupt existing bicycle or pedestrian programs or facilities; interfere with walking or bicycling accessibility; interfere with the implementation of a planned bicycle or pedestrian facility; or create a physical or operational transportation outcome that conflicts with applicable bicycle or pedestrian system plans, guidelines, policies, or standards.

Transit Analysis

The transit analysis evaluates whether the project would, directly or indirectly, disrupt existing transit services or facilities, substantially delay public transit, interfere with the implementation of a planned transit facility, or create physical or operational transportation outcomes that conflict with desired conditions expressed in adopted transit policies.

Vehicle Miles Traveled Analysis

This analysis is based on the CEQA Transportation Impact Analysis Report prepared by Fehr & Peers (Appendix H). The project would include the construction of truck fueling lanes and parking spaces, 12 vehicle fueling stations, a convenience store, a fast-food restaurant with a drive-through window, a fast-food restaurant without a drive-through window, and 10 overnight recreational vehicle (RV) parking spaces.

Lassen County and the City of Susanville do not have established VMT thresholds or standards. The City of Susanville General Plan Circulation Element identifies home-based residential VMT per day by census block group (City of Susanville 2024: C-14) and includes five years of historical VMT metrics that indicate an average of 85.35 historical VMT per capita in the city at a flat growth rate. However, no information regarding VMT per employee or per service population is included in the Circulation Element. Because the project is not a residential project and because the City does not provide any information on VMT per employee or service population, an apples-to-apples comparison of project-generated visitor and worker VMT to the per capita VMT data provided in the Circulation Element is not possible. Accordingly, as permitted by Guidelines section 15064.3, subdivision (b)(3), the City has elected to qualitatively analyze the project's potential VMT impacts.

State CEQA Guidelines Section 15064.3(b)(4) explains that the lead agency has discretion to choose the most appropriate methodology to evaluate VMT subject to other applicable standards, such as Section 15151 (standards of adequacy for EIR analyses). Regarding retail projects, the Technical Advisory recommends that "[g]enerally, lead agencies should analyze the effects of a retail project by assessing the change in total VMT because retail projects typically re-route travel from other retail destinations. A retail project might lead to increases or decreases in VMT, depending on previously existing retail travel patterns" (OPR 2018: 5). The "change in total VMT" method includes evaluation of a project's likelihood of diverting existing trips and the effect of such diversion on total VMT. The Technical Advisory also recommends that the "analysis should address the full area over which the project affects travel behavior, even if the effect on travel behavior crosses political boundaries" (OPR 2018: 30). Based on the guidance in the Technical Advisory and CEQA Guidelines section 15064.3(b), this section includes an analysis of the change in total VMT for worker and visitor trips.

The Technical Advisory also acknowledges that significance thresholds may be best determined on a case-by-case basis in rural areas. In setting thresholds for unique land use types or specific projects, the Technical Advisory recommends that "lead agencies should consider the purposes described in section 21099 of the Public Resources Code and regulations in the CEQA Guidelines on the development of thresholds of significance (e.g., CEQA

Guidelines, Section 15064.7)." These purposes, as set forth in section 21099[b][1], include "promot[ing] the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses."

Traffic data obtained for seven Love's Travel Stops in California and land use trip generation rates from the Institute of Transportation Engineers (ITE) were used to determine trip generation for the project (see Appendix H for details). This analysis also factors in pass-by trips into the calculation of total trips. Pass-by trips are defined as a trip already on the adjacent roadway that enters the project site while enroute to a different primary destination. See Appendix H for additional details related to VMT methodology.

Transportation Hazards and Emergency Access Analysis

The transportation hazards and emergency access analyses evaluate whether the project would, directly or indirectly, substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); create potentially hazardous conditions for people walking, bicycling, driving, or for public transit operations; or result in inadequate emergency access.

THRESHOLDS OF SIGNIFICANCE

The significance criteria used to evaluate the project impacts on transportation under CEQA are based on Appendix G of the CEQA Guidelines, the statutory purposes behind the shift from LOS to VMT as set forth in Public Resources Code section 21099[b], principles set forth in LCI's 2018 Technical Advisory, and the professional judgment of Fehr and Peers, Ascent Environmental, and City staff. The criteria for VMT account for the rural location of the proposed project. It is a common practice for lead agencies to use the inquiries found in Appendix G for purposes of fashioning significance thresholds. Here, the City, in its discretion, has done so, though it has also relied on other input. Thus, a transportation-related impact would be significant if implementation of the project would:

- conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;
- conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) by substantially increasing VMT in the region;
- substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
- result in inadequate emergency access.

ISSUES NOT DISCUSSED FURTHER

Transportation Hazards

Implementation of the project would include the construction and operation of a fuel station, convenience store, fast-food restaurant, parking lot, dog park, and off-site improvements. Construction activities would include demolition, site preparation, grading, underground construction, building construction, paving, and architectural coating. Construction activities would likely require lane closures and the hauling of heavy equipment (e.g., graders) to the staging area and the operation of large trucks on the surrounding roadway network. Because the roadway network surrounding the project site is already used by large trucks, such activity would not be considered an incompatible use. However, the hauling and operation of large equipment could increase the potential for hazardous conditions for people walking or bicycling depending on the path of travel (e.g., bicycling along SR 36 or Skyline Road).

The project would be required to comply with local and Caltrans construction standards and specifications to ensure the safety of travelers and to minimize transportation hazards during construction activities. The implementation of PDF TR-1 would ensure that a CMTP would be developed and implemented by the project contractor and submitted to the City of Susanville prior to construction to minimize the potential for safety hazards from construction. The CMTP would include details on any roadway or lane closures, traffic control measures, and approved routes to the project site. In

addition, pursuant to Caltrans' recommendations, large-size construction truck travel would be limited to off-peak commute hours to the maximum extent feasible; the details of which would be included in the CMTP. For these reasons, the preparation and implementation of a CMTP would minimize the potential for transportation hazards (e.g., conflicts between large trucks, vehicles, bicyclists, and pedestrians) during on-site and off-site project construction.

The project would include the extension of Skyline Road to the west, construction of ingress/egress driveways along the extension of Skyline Road, and the alteration of the existing SR 36/Skyline Road intersection. All new roadways and access improvements would be subject to and designed in accordance with local and State roadway design standards (e.g., adequate sight distance, turning radii, roadway width) to allow for the safe movement of all modes of transportation. Compliance with applicable standards would minimize transportation hazards. In addition, ingress and egress would be facilitated via separate driveway entrances along Skyline Road; one for heavy trucks and one for automobiles and RVs, thus minimizing conflicts between passenger vehicles and RVs with heavy trucks that could result in transportation hazards during operation. The intersection of SR 36/Skyline Road intersection, which would provide access to the project site, is a recently installed signalized intersection with safety-related features including pavement markings, intersection lighting, and advisory warning signs. In addition, since its construction in late 2020/early 2021 and June 2024, only one collision between two vehicles has been reported (Fehr & Peers 2025: 30). This intersection does not have a traffic collision history that involves a vulnerable roadway user (i.e., bicyclist or pedestrian) or that involved a truck, and implementation of the project would not result in queuing that could contribute to transportation hazards (Fehr & Peers). Further, the types of vehicles accessing the project site during operation (e.g., personal vehicles, large trucks) would be consistent with those using the roadway under existing conditions, as both are main arterials through the area. For these reasons, implementation of the project would not substantially increase hazards due to geometric design features or incompatible uses during construction or operation. This issue is not discussed further.

Emergency Access

Implementation of the project would not result in the alteration of any existing emergency access routes. Temporary lane closures could be required on SR 36 and Skyline Road during project construction, as the project would include a variety of offsite improvements including the installation of utility connections. A Caltrans encroachment permit would be required for construction work within the State highway right-of-way. The Caltrans Encroachment Permit Manual describes the general provisions of a Caltrans encroachment permit including standards of construction and requirements for public traffic control and emergency response. Implementation of PDF-TR-1 would require the construction contractor to prepare a CMTP which would include notification procedures and coordination with local emergency response organizations during construction activity. In addition, the project would be required to comply with the latest version of the California Fire Code, which includes requirements to maintain emergency vehicle access during construction.

The project would be designed and maintained in accordance with applicable standards associated with vehicular access, such that interference with existing emergency response or evacuation plans would not occur. As a condition of project approval, the City of Susanville Fire and Police Departments would review the project plans to ensure that adequate emergency vehicle access is provided. Given proper design of ingress/egress driveways and compliance with applicable standards and local regulations, operation of the project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. In addition, the SR 36/Skyline Road intersection includes emergency vehicle signal preemption equipment which enables first-response vehicles to request signal preemption. Implementation of the project would not result in the alteration of this equipment. For these reasons, adequate emergency access would be provided during the construction and operation of the project. This issue is not discussed further.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 3.9-1: Conflict with a Program, Plan, Ordinance or Policy Addressing the Circulation System, Including Transit, Roadway, Bicycle, and Pedestrian Facilities

Implementation of the project would not permanently alter the physical transportation network external to the corridor such that existing bicycle facilities, pedestrian facilities, and transit facilities and services would be adversely affected. In accordance with PDF-TR-1, the construction contractor would prepare a CMTP to minimize the potential for safety hazards during on-site and off-site construction. The project would include the implementation of two new crosswalks along SR 36 and Skyline Road and the construction of new onsite bicycle facilities, thus enhancing the environment for active modes of transportation. Additionally, as depicted in the project site plans, a 23-foot margin along the southern frontage of the project site is partially dedicated to accommodate the Class I facility extension proposed in the RTP and Active Transportation Plan for future implementation. Therefore, the project would not conflict with a program, plan, ordinance, or policy addressing transit, bicycle, and pedestrian facilities. This impact would be **less than significant**.

Transit Facilities and Service

The nearest transit facility to the project site is a bus stop located within the Safeway Shopping Center, approximately 0.4 miles north of the project site. The bus stop serves the Susanville City Route and West County Commuter Route, neither of which operates south of Riverside Drive. Therefore, because there are no existing transit facilities or services offered within the immediate vicinity of the project site, implementation of the project would not adversely affect any existing transit facilities nor disrupt existing transit service. Additionally, there are no planned transit facilities within the vicinity of the project site; therefore, the project would not conflict with adopted plans related to such facilities. For these reasons, the project would not disrupt existing transit facilities and services and would not conflict with adopted plans, guidelines, policies, or standards related to transit.

Roadway Facilities

The project would include the construction of a new internal roadway, parking lot, the extension of Skyline Road, and the construction of two ingress/egress driveways along the newly extended Skyline Road. All modified and newly constructed roads would be designed and constructed in accordance with local and Caltrans design guidelines and standard specifications. In addition, the project site plan would be subject to review by the City, thus ensuring that the project would not conflict with a program, plan, policy, or ordinance pertaining to roadway facilities.

Bicycle and Pedestrian Facilities

As described in Section 3.9.2 "Environmental Setting," there is a Class I bicycle path along Skyline Road between SR 36 and SR 139, and a 500-foot Class II bicycle lane along SR 36 south of its intersection with Skyline Road. There are also two crosswalks at the SR 36/Skyline Road intersection. Implementation of the project would include highway improvements and implementation of offsite utilities along SR 36 and Skyline Road. However, on-site construction and off-site improvements would not modify these existing bicycle and pedestrian facilities. In addition, in accordance with PDF-TR-1, during project construction, the construction contractor would prepare and implement a CMTP to facilitate the safe movement of all travelers throughout the project area, including people walking and bicycling. The project would include the construction of two crosswalks and implementation of a bicycle rack and bicycle parking, thus enhancing pedestrian and bicycle facilities within and around the project site. Implementation of these facilities is consistent with Active Transportation Plan Policy 2.3 which requires non-residential development to implement bicycle racks (LCTC 2022a), City General Plan Policy CIR-7.1 which aims to enhance pedestrian access to Main Street, and Policy CIR-7.4 which aims to enhance the safety of pedestrian crossings.

The RTP and Active Transportation Plan identifies the implementation of a Class I bicycle path from Johnstonville Road to the Bizz Johnson Trail as a high-priority project (LCTC 2023). The extension of the existing Class I facility would run south of the project site alongside the old railroad alignment right-of-way (LCTC 2022a). Project site plans show the dedication of a 23-foot right-of-way along the southern project site frontage to accommodate the future implementation of the Class I facility extension and thus is consistent and would not interfere with what is proposed

in the RTP and Active Transportation Plan. Therefore, the project would not conflict with the RTP and the Active Transportation Plan.

Summary

Implementation of the project would not require permanent modification of any existing transit, pedestrian, or bicycle facilities. The project would include enhanced pedestrian facilities around the project site and the implementation of onsite bicycle facilities, consistent with the Active Transportation Plan. In accordance with PDF-TR-1, the construction contractor would develop and implement a CMTP that includes measures to provide for the safe movement of vehicles, bicycles, and pedestrians during on-site and off-site project construction. For these reasons, the project would not adversely affect an existing roadway, transit, bicycle, or pedestrian facility. The RTP and Active Transportation Plan propose an extension of the Class I facility along Skyline Road along the southern frontage of the project site; the right-of-way for which is incorporated into the project site plans as a 20-foot margin. Therefore, the project would not conflict nor be inconsistent with these adopted plans. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 3.9-2: Conflict or be Inconsistent with CEQA Guidelines section 15064.3, Subdivision (b) by Substantially Increasing VMT in the Region

The project would involve the construction of 12 vehicle fueling stations, 4 truck fueling stations, a convenience store, a fast-food restaurant with a drive-through window, a fast-food restaurant without a drive-through window, and 10 overnight recreational vehicle (RV) parking spaces. Based on the trip generation rates from compiled survey data, most project trips (including both heavy truck trips and automobile and light truck trips) would be vehicles currently traveling on SR 36, with only a small portion of new trips generated by employees. The project's commercial land uses would not be considered a regional draw, as there are similar facilities (e.g., other fast-food restaurants and fuel facilities) near the project facility. In addition, the RV trips generated by the project would not be newly generated; instead, they would be redistributed throughout the regional roadway network based on the destination and route chosen by travelers. For these reasons, the project would not conflict or be inconsistent with State CEQA Guidelines Section 15064.3(b) by substantially increasing VMT in the region. The impact would be **less than significant**.

The City and the County have not adopted their own VMT guidelines and thresholds that address CEQA Guidelines Section 15064.3. Therefore, in the absence of lead agency adopted VMT guidelines and thresholds of significance, the VMT analysis herein relies on the guidance provided in CEQA Guidelines Section 15064.3 and the OPR Technical Advisory and the statutory purposes behind the shift from LOS to VMT, as set forth in Public Resources Code Section 21099[b][1]. The Highway Performance Monitoring System estimates urbanized Susanville to have a VMT of 41.21 (Caltrans 2023). Based on the guidance in the *Technical Advisory* and CEQA Guidelines section 15064.3, subdivision (b), and because the project does not fit within the residential, office, retail categories set forth in the *Technical Advisory*, the City has elected to assess the project's change in total VMT for trips by workers and visitors. The Susanville General Plan Circulation Element includes information on VMT per capita for home-based residential travel. However, it does not provide any information on VMT per employee or service population, so an apples-to-apples comparison of project generated visitor and worker VMT to citywide VMT averages from the Circulation element is not possible. Accordingly, as permitted by Guidelines section 15064.3, subdivision (b)(3), the City has elected to qualitatively analyze the project's potential VMT impacts. The analysis below provides descriptions of VMT impacts separated by land use type, as recommended in the Technical Advisory.

In terms of VMT considerations, as shown in Appendix H, the number of new daily trips generated by all project travel components (i.e., passenger vehicle fuel pumps, truck fuel pumps, truck parking, convenience market, fast-food restaurants, and overnight RV parking), the estimated average length of these trips, and the VMT (the product of daily trips and trip length) is recreated in Table 3.9-1.

Table 3.9-1 Project-Related New Passenger Vehicle, Recreational Vehicle, and Truck VMT Generation

Vehicle Type	New Daily Trips	Trip Length	VMT
Passenger Vehicles (includes SUVs, and light duty trucks).	777	2.2 miles	1,709
Recreational Vehicles (RVs)	20	75 miles	1,500
Trucks (consists of medium- and heavy duty trucks)	120	2.4 miles	288

Notes: Passenger vehicle trip length based on weighted average of the following likely trip origins/destinations: Downtown Susanville Area (75% of all new trips at 2 miles one-way, Skyline Road north toward Lassen Community College (10% of all trips at 3 miles one-way, and Johnstonville South (15% of all trips at 2.5 miles one-way). RV trip length based on half of trips originating/destined for Reno (84 miles one-way) and the other half originating/destined for the south entry/exit of Lassen National Park (67 miles).

Average one-way trip length of 2.4 miles assumed based on average travel distances to the site for local diesel trucks (2.2 miles) and trucks diverting off US Highway 395 (2.5 miles).

Source: Fehr & Peers, 2025. adapted by Ascent 2025.

Passenger vehicles and trucks that leave SR 36 to access the project site would also generate a small amount of VMT, which is shown in Table 3.9-2.

Table 3.9-2 Project-Related Pass-By Passenger Vehicle, Recreational Vehicle, and Truck VMT Generation

Vehicle Type	New Daily Trips	Trip Length	VMT
Passenger Vehicles (includes SUVs, and light duty trucks).	2,242	750 feet	318
Recreational Vehicles (RVs)	20	750 feet	3
Trucks (consists of medium- and heavy duty trucks)	1,073	1,250 feet	254

Notes: Pass-by trip length estimated based on distance from SR 36 to auto and truck driveway (plus nominal travel within site).

Source: Fehr & Peers, 2025. adapted by Ascent 2025.

Commercial Uses

The project is located in a low VMT per capita Census Block Group and would include the construction of a 12-position passenger vehicle fueling station, 4-position truck fueling station, 7,943 square foot (sf) convenience store, a 3,474 sf fast-food restaurant with the drive-thru, and a 1,588 sf fast-food restaurant. Travel survey data for Love's Travel Stops (see Appendix H) throughout California indicate that most trips to study sites were existing trips diverted off the adjacent highway (i.e., pass-by trips). Most project-generated trips (including heavy truck trips and passenger vehicles) are anticipated to be pass-by trips (i.e., vehicles already traveling on SR 36), with only a small portion of new trips generated by employees traveling to and from work at the proposed Travel Stop. Specifically, pass-by trips would represent most trips (i.e., approximately 88 percent of truck and automobile trips) associated with the project. In addition, there are existing fast-food restaurants approximately 2,200 feet north of the project site as well as throughout downtown Susanville. The presence of these facilities demonstrates that the project's commercial/retail land uses (i.e., fueling station, convenience market, and fast-food restaurants) would not be a regional draw that would generate new trips, as there are other such facilities located in the surrounding area. Visitors would simply choose between the project and similar businesses in the surrounding area. The trip length for pass-by trips diverting from SR 36 is approximately 750 feet (see Appendix H for modeling details). Because pass-by trips represent most trips associated with the project and because the average trip length is not substantial, the project is not anticipated to be a substantial generator of VMT.

Overnight Recreational Vehicle Parking Area

The project would include the construction of 10 overnight RV parking spaces with full hookups (i.e., power, water, and sewer). To determine the trip generation rate for the overnight RV parking area, Fehr & Peers staff conducted counts at the overnight RV lot at a Love's Travel Stop in Brigham, Utah on July 25, 2024. The trip generation levels were then adjusted for the project based on the number of RV spaces at the project site. Based on the adjust trip generation rates, the overnight parking area associated with the project is anticipated to generate 40 total new daily trips (Fehr & Peers 2025: 43). However, because some trips to the RV park would be "pass-by" trips (i.e., trips already on the adjacent roadway that enters the project site enroute to a different primary destination), a pass-by trip

percentage estimate of 50 percent was applied to the overnight parking area trip generation rate (i.e., 40 trips) (Fehr & Peers 2025: 46). Accounting for daily pass-by trips, the RV parking area is expected to generate 20 new daily trips (Fehr & Peers 2025: 46). The city is surrounded by recreational opportunities including Lassen Volcanic National Park approximately 67 miles northwest, but the city itself is not a major tourist destination. The RV parking area is anticipated to serve existing trips on their way to their final destination by providing customers with a temporary place to refuel and rest. Accordingly, the RV spots are not anticipated to generate trips solely to the project site. Furthermore, the project applicant anticipates the average night per stay would be one night per visitor. Therefore, the 20 new daily RV trips would have a negligible effect on the overall VMT generation in the city and the region.

VMT Efficiency

While unique, the project's land use type is VMT efficient, which can be demonstrated by a comparative VMT review against a reasonable alternative land use proposal. Because the Circulation Element only provides information on homebased VMT per capita, this analysis compares the project's VMT generation to VMT generated by a hypothetical residential development. While the site is not currently designated for residential use, the project proposes annexation of the site into the City with a General Commercial/Shopping Center land use designation and corresponding C-2 (General Commercial Shopping District) zoning, which permits residential development at up to 20.0 units per acre. If the approximate 14-acre site were to be developed at an average of 12 units per acre (i.e., a mix of single-family and multi-family), the yield would be 168 units. According to the US Census, average household size in Susanville is 2.5 persons per household, implying this hypothetical project could have 420 residents. Per the Circulation Element, each resident would generate 11.2 VMT, yielding a total of 4,704 VMT. The proposed project's total VMT generated (4,072 per Tables 11 and 12 in Appendix H) is 13.5 percent less than the VMT of the hypothetical residential project, which itself is considered to be a VMT-efficient use. This VMT efficiency is reinforced by the fact that the vast majority of truck trips to the project site (approximately 88 percent) would be pass-by trips (that is, temporary trips from trucks already traveling to other destinations on SR 36). Given the size of the project site, and the economic and fiscal benefits it would bring to the City, the proposed project, viewed on a per-acre or per capita basis, would represent a very VMT efficient means of bringing about such benefits.

Summary

Most project-generated trips are anticipated to be pass-by trips with new employees generating a small portion of new trips. The trip length for pass-by trips diverting from SR 36 is approximately 750 feet. Because most project-generated trips are anticipated to be pass-by trips, and because the trip length for such trips is not substantial (i.e., approximately 750 feet), consistent with the travel survey data from existing Travel Stops throughout the state, the project is anticipated to generate low VMT from workers and visitors. In addition, there are other similar commercial/retail land uses (i.e., gas station, convenience market, and fast-food restaurants) in the area; thus, the project would not be a regional draw. The proposed project is a VMT-efficient land use situated in a VMT-efficient area of the City and would not substantially increase VMT in the region. For these reasons, the project would not conflict with CEQA Guidelines Section 15064.3(b) regarding VMT and this impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

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3.10 TRIBAL CULTURAL RESOURCES

This section analyzes and evaluates the potential impacts of the project on known and unknown (undiscovered or unidentified) Tribal cultural resources. Tribal cultural resources, as defined by Assembly Bill (AB) 52, Statutes of 2014, in Public Resources Code (PRC) Section 21074, are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a Tribe. A Tribal cultural landscape is defined as a geographic area (including both cultural and natural resources and the wildlife therein) associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values.

One comment letter regarding Tribal cultural resources was received in response to the Notice of Preparation (see Appendix A). The Native American Heritage Commission (NAHC) requested AB 52 and Senate Bill (SB) 18 compliance information; because there is a General Plan amendment associated with the project, which is the trigger for SB 18 compliance, SB 18 compliance was also undertaken. SB 18 consultation request letters were sent to the Tribes on the NAHC list on March 25, 2025. No Tribes requested consultation in the 90-day consultation window, which closed on June 26, 2025, and there is no further discussion on this requirement. AB 52 compliance is described below.

This evaluation is based on the Cultural Resources Technical Report completed by Ascent in May 2025 (Appendix E).

3.10.1 Regulatory Setting

FEDERAL

There are no federal regulations that apply.

STATE

California Register of Historical Resources

All properties in California that are listed in or formally determined eligible for listing in the National Register of Historic Places (NRHP) are also listed in the California Register of Historical Resources (CRHR). The CRHR is a listing of State of California resources that are significant in the context of California's history. It is a Statewide program with a scope and with criteria for inclusion similar to those used for the NRHP. In addition, properties designated under municipal or county ordinances are also eligible for listing in the CRHR.

A historical resource must be significant at the local, State, or national level under one or more of the criteria defined in the California Code of Regulations Title 15, Chapter 11.5, Section 4850 to be included in the CRHR. The CRHR criteria are tied to CEQA because any resource that meets the criteria below is considered a significant historical resource under CEQA. As noted above, all resources listed in or formally determined eligible for listing in the NRHP are automatically listed in the CRHR.

The CRHR uses four evaluation criteria:

Criterion 1. Is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.

Criterion 2. Is associated with the lives of persons important to local, California, or national history.

Criterion 3. Embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of a master; or possesses high artistic values.

Criterion 4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

Similar to the NRHP, a historical resource must meet one of the above criteria and retain integrity to be listed in the CRHR. The CRHR uses the same seven aspects of integrity used by the NRHP: location, design, setting, materials, workmanship, feeling, and associations.

California Environmental Quality Act

CEQA requires public agencies to consider the effects of their actions on "[T]ribal cultural resources." PRC Section 21084.2 establishes that "[a] project with an effect that may cause a substantial adverse change in the significance of a [T]ribal cultural resource is a project that may have a significant effect on the environment." PRC Section 21074 states:

a) "Tribal cultural resources" are either of the following:

   (1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are either of the following:

      (A) Included or determined to be eligible for inclusion in the CRHR.

      (B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

   (2) 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American Tribe.

b) A cultural landscape that meets the criteria of subdivision (a) is a Tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "nonunique archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a Tribal cultural resource if it conforms with the criteria of subdivision (a).

AB 52, signed by the California Governor in September of 2014, established a new class of resources under CEQA: "[T]ribal cultural resources," defined in PRC Section 21074. Pursuant to CEQA requirements, lead agencies undertaking CEQA review must, upon written request of a California Native American Tribe, begin consultation before the release of an EIR, negative declaration, or mitigated negative declaration. CEQA Sections 21080.3.1 and 21080.3.2 state that within 14 days of determining that a project application is complete, or to undertake a project, the lead agency must provide formal notification, in writing, to the tribes that have requested notification of proposed projects in the lead agency's jurisdiction. If it wishes to engage in consultation on the project, the tribe must respond to the lead agency within 30 days of receipt of the formal notification. The lead agency must begin the consultation process with the tribes that have requested consultation within 30 days of receiving the request for consultation. Consultation concludes when either (1) the parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource, or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.

If the lead agency determines that a project may cause a substantial adverse change to a tribal cultural resource, and measures are not otherwise identified in the consultation process, provisions under PRC Section 21084.3 (b) describe mitigation measures that may avoid or minimize the significant adverse impacts. Examples include:

   (1) Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

   (2) Treating the resource with culturally appropriate dignity considering the tribal cultural values and meaning of the resource, including, but not limited to, the following:

      (A) Protecting the cultural character and integrity of the resource,

      (B) Protecting the traditional use of the resource, and

(C) Protecting the confidentiality of the resource.

(3) Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.

(4) Protecting the resource.

Health and Safety Code, Section 7050.5

Section 7050.5 of the Health and Safety Code requires that construction or excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If they are determined to be those of a Native American, the coroner must contact NAHC.

California Native American Historical, Cultural, and Sacred Sites Act

The California Native American Historical, Cultural, and Sacred Sites Act (PRC Section 5097.9) applies to both State and private lands. The act requires, upon discovery of human remains, that construction or excavation activity cease and that the county coroner be notified. If the remains are those of a Native American, the coroner must notify the NAHC, which notifies (and has the authority to designate) the most likely descendants (MLD) of the deceased. The act stipulates the procedures the descendants may follow for treating or disposing of the remains and associated grave goods.

Public Resource Code Section 5097

PRC Section 5097 specifies the procedures to be followed in the event of the unexpected discovery of human remains on nonfederal land. The disposition of Native American human burials falls within the jurisdiction of the NAHC. Section 5097.5 of the Code states the following:

> No person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor.

LOCAL

Lassen County

Lassen County General Plan

The 2000 Lassen County General Plan (Lassen County 1999) and subsequent updates do not contain any goals or policies specific to Tribal cultural resources that are relevant to the project.

Lassen County Code of Ordinances

The Lassen County Code of Ordinances does not contain any laws or ordinances related to Tribal cultural resources that are relevant to the project.

City of Susanville

City of Susanville General Plan

Susanville's General Plan was adopted in 1991 and the City is in the process of updating the various elements of the General Plan. As of mid-2025, the City has adopted updates to the Land Use, Circulation, and Housing Elements, and plans to update the remaining elements. The City's current Open Space, Parks, Recreation, and Child Care element, adopted in 1991, contains the following program and policy related to Tribal cultural resources that are relevant to the project:

- Action program [49]: All development applications and public projects that require EIRs will routinely be sent to the "California Archaeological Inventory—Northeast Information Center" at the Department of Anthropology, Chico State University, for review and recommendations regarding archaeological findings.
    - In those areas identified as being the actual or probable sites of archaeological remains, any projects on City land or requiring the issuance of permits by the City will be investigated during plan review to determine whether valuable archaeological remains will be affected by the project. Upon the first discovery of any archaeological findings, development activity will be halted until professional archaeological examination and preservation is accomplished.
- Policy aj: The City shall take all possible precautions to insure that no action by the City or County results in the loss of the irreplaceable archaeological record present in the City's planning jurisdiction, and shall work with the County toward that end.

Susanville Municipal Code

The Susanville Municipal Code does not contain any laws or ordinances related to Tribal cultural resources that are relevant to the project.

3.10.2 Environmental Setting

NATIVE AMERICAN CULTURAL SETTING

Native American Precontact Setting

The following Native American precontact setting, ethnographic history information is based on the *Archaeological Survey Report Susanville Southeast Gateway, Lassen County, California, SR 36 PM 26.2 to PM 26.5, District 2, PPNO 3492,* prepared by WSA, Inc. (WSA 2017). The western Great Basin has been the focus of intensive and very productive archaeological research, although prior to the 1970s archaeological studies and dates tended to be site specific.

Early Holocene (10,000 to 7,000 BP)

The earliest period is the Early Holocene and dates between 10,000 to 7,000 before present (BP). Although these sites are rare, Early Holocene sites represent the earliest recorded occupation of the western Great Basin. Artifact assemblages associated with the Early Holocene compare to other early Great Basin assemblages, and are usually characterized by Great Basin Stemmed series projectile points, crescents, a variety of steep-sided formed flaked tools, and bifacial thinning debris.

Post-Mazama (7,000 to 5,000 BP)

Post-Mazama archaeological record transition between a "Pluvial Lakes Tradition" which characterizes the preceding Early Holocene Period, and one typical of the Great Basin Archaic. Components dating to this period include Northern Side-notched projectile points and a diffuse, but more varied assortment of hunting and processing tools typical of high residential mobility. Settlements began to move away from lake shores and towards more limited optimum subsistence localities such as the Sierran Front. These locations may have served as a refuge for geographically disparate populations at the height of mid-Holocene warming.

Early Archaic (5,000 to 3,500 BP)

The transition from Pre-Archaic to Archaic adaptive strategies most likely occurred in response to several factors that were centered around environmental fluctuations and ecological shifts, which took place during the Early Holocene. In the Honey Lake Basin, sites located in lakeshore contexts that had been the focus of previous occupations were now confined to nearby springs and pond areas where water supplies were perhaps more reliable. Compared to adaptive strategies of the Early Holocene, ground to flaked stone implements appear to have increased, suggesting a broadening of the subsistence base with a focus on the processing and storage.

Early Archaic processing assemblages from the Tuscarora Pipeline project do not contain sufficient data to allow comment on the character or intensity of vegetal processing activities. The existence of the "Milling Stone Horizon" in northeastern California, which he sees as a generalized hunting and gathering tradition geared toward the intensive exploitation of plant resources.

Middle Archaic (3,500 to 1,300 BP)

The Middle Archaic in the Lahontan Basin is thought to span the time period from approximately 3500 to 1300 BP and was associated with a cool, moist climatic interval. The transition between the Early and Middle Archaic is seen through a gradual shift in settlement/subsistence patterns along with the stylistic elaboration and increases in local population densities. There was an increase in archaeological visibility during the Middle Archaic Period for northeastern California. For instance, many of the most elaborate regional archaeological manifestations.

During the Middle Archaic, there was an intensification of plant and faunal resources, and the hunting of large game appears to have continued throughout. However, the presence of rabbit and other small rodents in the faunal assemblages along with the grinding implements suggest that changes were occurring with regards to subsistence practices with a greater diversity of utilized species. Winter sites and seasonal base camps appeared to have been consistently reoccupied, with winter villages possessing semi-subterranean pit houses and interior features such as hearths, storage pits and burials.

Late Archaic (1,300 BP to 600 BP)

For northeastern California, the Late Archaic includes several cultural changes which may have been triggered by population increases, and a response to a warmer, drier climatic trend which peaked sometime around 1500 BP During the Late Archaic period, the atlatl and dart were replaced by the bow and arrow and other smaller and lighter projectile points such as the Eastgate and Rose Spring series. Technological changes occurred to lithic resources in regard to the production of expediently made flake tools from locally available materials rather than the use of quarried raw materials. Plant processing equipment became more abundant and elaborate within the site assemblages across the region during this period. These assemblages suggest a reorganization of the settlement-subsistence adaptation, based on a major intensification in the exploitation of roots and other plant resources. This also suggests that plant foods and small game were exploited at the expense of large game. Overall, the subsistence strategy during the Late Archaic involved a continued increase in both the diversity of resources being utilized as well as the variety of habitats exploited. These changes are thought to reflect a decreased foraging mobility and territoriality.

Terminal Precontact (600 BP to European Contact)

Throughout the broader interface between Great Basin and California-oriented populations in this region, large seasonal or semi-permanent, Late Archaic settlements were abandoned and replaced by smaller sites inhabited by one or a few independent households. This shift to smaller settlements also created significant reduction in the logistical procurement of resources, most of which were now exploited daily from residential encampments. Much of the same pattern is reflected in a lack of specialized implements, with the artifact assemblages being extremely similar between sites and comprised predominantly of expedient implements.

Several Terminal Prehistoric habitation sites were documented along the Tuscarora and Alturas corridors, the most important being a large habitation complex within Crooks Canyon, near Likely. The settlement pattern represented by these residential components was most likely defensive in nature, perhaps a response to the social instability during the very end of the prehistoric period. Prehistoric occupation in the region is thought to be represented by the residues of small, family-level bands of Numic ancestry who exploited resources mostly from residential encampments.

Ethnographic History

The following ethnographic history information is based on the Cultural Resource Assessment of the Proposed Sierra View Subdivision Sewer Line and Historical Evaluation of the Cramer Ranch Complex, Lassen County, California, prepared by Peak and Associates (Peak and Associates 1996).

Francis A. Riddell did ethnographic work with the Honey Lake Paiute, the Maidu and, to an extent, the Achomawi, making him uniquely qualified to deal with the confused situation in Honey Lake Valley in the proto-historic period.

The Maidu had controlled all of Honey Lake Valley, until the Paiute incursion into the area and apparently held off the newcomers from about 1300 to 1700. At this point the Maidu withdrew to the west side of the valley, centering on the Susan River, and the Wadikut band of Paiute took over the shores of Honey Lake. Riddell found that the Maidu claimed to have controlled this territory, but could name no camp sites or other features, while the Paiute could supply names and locations for camps and geographic features all around Honey Lake. The actual date of this change of control is an educated guess.

The way of life of both peoples was quite similar in the level of technology and subsistence pattern. Their main villages were located near reliable water supplies and much of the subsistence base was derived from the plentiful plants and animals which depended upon the same water source. Both also ranged widely for other vegetable and animal food sources, ground nuts and seeds into flour, participated in communal hunts, and probably enjoyed fairly peaceful relationships with each other, after a period of adjustment. The adjustment was aided by very different attitudes toward Honey Lake. To the Maidu, who were basically mountain people and controlled several rich valleys on both sides of the Sierra crest, Honey Lake had been merely a far eastern possession of no great importance. To the Paiute the lake represented an opportunity to avoid a life of wandering on the desert and, as such, was vitally important.

The Achomawi and Washo both made their presence felt in the valley during the historic period, but the time depth of their incursions is not known. By the time the early settlers noticed and identified them, both groups were under a great deal of pressure from settlers in their own territories and could have taken to raiding other territories because their best food resources in their home country were already under white control.

The initial contact with European/European-descended settlers proceeded much more slowly in Honey Lake Valley than in many areas of California. There a small gold rush in this area, although a lot of prospecting was done, and the European/European-descended settler population of the valley grew slowly. The Indians managed to retain their traditional lifestyle for some time after contact. As a result, the European/European-descended settlers lived in constant fear of an "Indian uprising" while the Indians watched their best land slowly but surely fall into the hands of farmers and ranchers. Some small-scale violence did result, but never in the magnitude that the settlers feared.

Contemporary Native American Setting

The original 30 acres of the Susanville Indian Rancheria were purchased August 15, 1923, under the Landless and Homeless Act; in which the U.S. Congress provided funds to purchase land for Landless and Homeless California Indians (SIR 2024).

On June 6, 1975, Clifton C. Cramer and Betty G. Cramer performed a Quit Claim conveyance of the old Indian Cemetery consisting of 0.53 acres to the Bureau of Indian Affairs to hold into trust for the Susanville Indian Rancheria. The Bureau of Indian Affairs accepted this conveyance on December 7, 1981. An additional 120 acres was added to the Rancheria on October 14, 1978, under the special legislation of Public Law 95-459 which was sponsored by the honorable Congressman Harold Terry “Bizz” Johnson. Another 80 acres was donated to the Rancheria in 1994 that has not been put into Federal Trust status. An additional 72 acres located at the Sierra Army Depot based in Herlong, California, was acquired from the U.S. Department of the Army under the Base Realignment and Closure Act and added to the Rancheria on November 6, 2000.

The Susanville Indian Rancheria Housing Authority purchased 3.21 acres on December 30, 2000, transferred that land to the tribe, and the land was accepted into trust status on January 5, 2004. On March 29, 2002, the tribe purchased an additional 875 acres adjacent to the Upper Rancheria utilizing proceeds from the casino loan from the Marshall Group and this land was accepted into trust status on December 8, 2004. On September 30, 2003, the tribe purchased 160 acres located close to Antelope Lake – The Cradle Valley Ranch. On January 28, 2016, the Susanville Indian Rancheria Corporation signed a Grant Deed transferring 10.45 acres of the Guitierez property that are adjacent to west side of Paul Bunyan Road to the tribe at no cost.

Congressman Doug LaMalfa (R-CA-1) introduced H.R. 2212 on May 1, 2015, seeking to transfer 301 acres of Federal Land that the Bureau of Land Management had identified as excess property to the tribe. On June 22, 2016, President Obama signed Public Law 114-181 that transferred these lands into trust for the benefit of the Susanville Indian Rancheria. On September 12, 2016, after the passage of a ballot measure approving the purchase of the Guitierez

property to the east side of Paul Bunyan Road, the Susanville Indian Rancheria purchased five parcels of land totaling 37.17 acres. This additional land brings the total land base of the tribe to 1,401.74 acres in trust status and 287.62 acres in fee status.

The anthropological tribes associated with the Susanville Indian Rancheria are: Maidu, Paiute, Pit River, and Washoe. The Federal Government, however, through the Department of the Interior recognizes *political entities* and not the anthropological entities. The Susanville Indian Rancheria, although it is made up of various tribes, is recognized as a distinct (political) entity from the other tribes who make up the Susanville membership (SIR 2024).

RECORDS SEARCHES AND CONSULTATION

Records Search

As discussed in Section 3.3, "Cultural Resources," a records search that included the area of potential ground disturbance and a one-half-mile radius was completed at the Northeast Information Center (NEIC) at California State University, Chico on November 26, 2024 (File No. NE24-554; Appendix E). Review of the NEIC records search results for the study area did not identify any previously recorded resources within the study area.

Sacred Lands File Search

A search of the Sacred Lands File (SLF) was requested from the NAHC on October 29, 2024. On November 6, 2024, the SLF database search returned positive results for Native American resources within the vicinity of the study area. Attached to the results was a list of Native American groups and individuals to contact who may also have knowledge of cultural resources in the study area. This list was used by the City for AB 52 consultation purposes.

Pedestrian Survey

An intensive pedestrian survey of the area of potential ground disturbance was conducted on December 7, 2024. All open areas where the ground was visible were closely examined. Special attention was given to bare patches of ground, exposed soils, rodent burrows, and dirt piles. Ground visibility was poor (0 to 15 percent visible) because most of the area of potential ground disturbance was covered in dense, dry grasses that were three feet tall in most areas. During the pedestrian survey, all visible ground surface in the area of potential ground disturbance was carefully examined for cultural material (e.g., flaked stone tools, tool-making debris, stone milling tools, or fire-affected rock), soil discoloration that might indicate the presence of a cultural midden, soil depressions and features indicative of the former presence of structures or buildings (e.g., postholes, foundations), or historic-era debris (e.g., metal, glass, ceramics). Ground disturbances (e.g., animal burrows, embankments, graveled or dirt roads) were visually inspected. No cultural resources, including archaeological resources that may have tribal significance, were discovered as a result of this survey.

Tribal Consultation

On January 24, 2025, in compliance with AB 52 requirements, the City of Susanville sent letters to representatives of the following Tribes: Berry Creek Rancheria of Maidu Indians, Estom Yumeka Maidu Tribe of the Enterprise Rancheria, Greenville Rancheria of Maidu Indians, Honey Lake Maidu, Mooretown Rancheria of Maidu Indians, Pakan'yani Maidu of Strawberry Valley Rancheria, and Susanville Indian Rancheria. No Tribes requested consultation under AB 52 in the 30-day consultation period.

In addition, Senate Bill 18, (SB 18; Chapter 905, Statutes of 2004) requires cities and counties to contact, and consult with California Native American tribes prior to amending or adopting any general plan or specific plan. As the project requires an amendment to the City of Susanville's general plan, SB 18 consultation letters were sent to the aforementioned Tribes on March 28, 2025. No Tribes requested consultation in the 90-day consultation window, which closed on June 26, 2025.

Potential for Buried Archaeological Deposits

As discussed in Section 3.3., "Cultural Resources," the age of the soils present, history of land use, and the negative results of the pedestrian survey suggest that the potential for the presence of buried deposits of cultural resources in the study area is moderate.

3.10.3 Impacts and Mitigation Measures

METHODOLOGY

Information related to Tribal cultural resources is based on findings reported in the records search (NCIC File Number File No. NE24-554) and the NAHC SLF database search. As described in Section 3.13.2, "Environmental Setting," no Tribes request consultation under AB 52. The analysis is also informed by the provisions and requirements of State and local laws and regulations that apply to cultural resources.

PRC Section 21074 defines "Tribal cultural resources" as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American [T]ribe" that are listed or determined eligible for listing in the CRHR, listed in a local register of historical resources, or otherwise determined by the lead agency to be a Tribal cultural resource.

For the purposes of this impact discussion, "historical resource" is used to describe historic-era, built-environment resources while the term "unique archaeological resource" is used to describe archaeological sites. Tribal cultural resources, which may qualify as "historical resources" pursuant to CEQA, are analyzed separately from built-environment historical resources and unique archaeological resources, which are analyzed in Section 3.3, "Cultural Resources," of this EIR.

THRESHOLDS OF SIGNIFICANCE

Based on Public Resources Code section 21084.2 and the inquiries found in Appendix G of the State CEQA Guidelines, the project would result in a potentially significant impact on Tribal cultural resources if it would:

- cause a substantial adverse change in the significance of a Tribal cultural resource, defined in PRC 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 cultural value to a California Native American Tribe, and that is:
  - (i) 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);
  - (ii) 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 Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

ISSUES NOT DISCUSSED FURTHER

All potential Tribal cultural resources impacts are evaluated below.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 3.10-1: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource

The study area has a moderate sensitivity for intact buried archaeological resources, including Tribal cultural resources. Although no Tribal cultural resources were identified within the area of potential ground disturbance, project-related grading and excavation could result in the unanticipated discovery or damage of yet undiscovered Tribal cultural resources, as defined in PRC Section 21074. This impact would be **potentially significant**.

As discussed in Section 3.4, "Cultural Resources," a full accounting of all potential cultural resources located within the study area was achieved through a records search, literature review, and field survey. No precontact archaeological sites that may have tribal significance and no Tribal cultural resources, as defined in PRC Section 21074, were identified within the area of potential ground disturbance as part of these efforts. Nevertheless, the analysis of the geoarchaeological data concluded that the study area has a moderate sensitivity for intact buried archaeological resources, including Tribal cultural resources. Project construction would require excavation to a depth of approximately 10 feet that would extend into native soils. Ground-disturbing activities have potential to encounter previously undiscovered or unrecorded archaeological sites and materials, including Tribal cultural resources, which could result in damage or destruction to these resources. This impact would be **potentially significant**.

California law recognizes the need to protect Native American human burials, skeletal remains, and funerary items associated with Native American burials from vandalism and inadvertent destruction. The procedures for the treatment of Native American human remains are contained in California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097. These statutes require that, if human remains are discovered, potentially damaging ground-disturbing activities in the area of the remains shall be halted immediately, and the appropriate County coroner shall be notified immediately. If the remains are determined by the coroner to be Native American, the NAHC shall be notified within 24 hours and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. Following the coroner's findings, the NAHC-designated Most Likely Descendant, and the landowner shall determine the ultimate treatment and disposition of the remains and take appropriate steps to ensure that additional human interments, if present, are not disturbed. The responsibilities for acting upon notification of a discovery of Native American human remains are identified in PRC Section 5097.94.

Mitigation Measures

Mitigation Measure 3.10-1a: Worker Awareness Training

Implement Mitigation Measure 3.4-1a.

Mitigation Measure 3.10-1b: For All Ground-Disturbing Construction Activities, Halt Ground Disturbance Upon Discovery of Subsurface Tribal Cultural Resources

Implement Mitigation Measure 3.4-1b.

Significance after Mitigation

Mitigation Measures 3.10-1a and 3.10-1b identify procedures that would minimize the potential for construction activities to damage or destroy archaeological resources, including Tribal cultural resources, that may be inadvertently uncovered during ground-disturbing activities, in accordance with Section 15126.4 of the CEQA Guidelines. Specifically, Mitigation Measure 3.16-1a would require construction workers to undergo worker awareness training to be informed of the procedures to follow in the event of an unanticipated discovery. Mitigation Measure 3.10-1b identifies requirements to halt construction activities in the vicinity of any unanticipated discoveries until a qualified professional archaeologist and tribal representatives, if resources have tribal significance, can assess the significance of the find and provide recommendations for the appropriate disposition of the resource. Compliance with these mitigation measures would reduce potential impacts on archaeological resources to a **less-than-significant** level.

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3.11 UTILITIES AND SERVICE SYSTEMS

This section evaluates the availability of existing utility and infrastructure systems (water, wastewater, stormwater, electricity, natural gas, and solid waste) to serve the project and the impact of the project on these systems. The analysis is based on documents obtained from the City of Susanville, Susanville Sanitation District, Lassen Municipal Utility District, and Lassen Regional Solid Waste Management Authority, and the California Department of Resources Recycling and Recovery (CalRecycle).

No comments in response to the NOP were received that identified concerns regarding utilities and service systems.

3.11.1 Regulatory Setting

DOMESTIC WATER AND GROUNDWATER

Federal

No federal plans, policies, regulations, or laws related to domestic water are applicable to the project.

State

Urban Water Management Plan

In 1983, the California Legislature enacted the Urban Water Management Planning Act (UWMPA) (California Water Code Sections 10610–10656). The UWMPA states that every urban water supplier that provides water to 3,000 or more customers, or that provides more than 3,000 acre-feet (af) of water annually, should make every effort to ensure the appropriate level of reliability in its water service sufficient to meet the needs of its various categories of customers during normal, dry, and multiple dry years. This effort includes the adoption of an Urban Water Management Plan (UWMP) by every urban-water supplier and an update of the plan every 5 years on or before December 31, of every year ending in a five or zero. The UWMPA has been amended several times since 1983 with the most recent amendment occurring with Senate Bill (SB) 318 in 2004. The UWMPA and SB 610, described below, are interrelated; the UWMP is typically relied upon to meet the requirements for SB 610.

California Green Building Standards Code

In January 2010, the California Building Standards Commission adopted the statewide mandatory Green Building Standards Code (CALGreen) (CCR Title 24, Part 11). CALGreen applies to the planning, design, operation, construction, use, and occupancy of every newly constructed building or structure in California. The 2022 CALGreen Code, which took effect on January 1, 2023, includes updates for planning and design, water efficiency and conservation, material conservation and resource efficiency, and environmental quality.

CALGreen requires the installation of energy- and water-efficient indoor infrastructure for all new projects beginning after January 1, 2011. It requires residential and nonresidential water efficiency and conservation measures for new buildings and structures that will reduce the overall potable water use in the building by 20 percent. The 20-percent water savings can be achieved by (1) installing plumbing fixtures and fittings that meet the 20-percent reduced flow rate specified in the CALGreen Code or (2) demonstrating a 20-percent reduction in water use from the building "water use baseline."

California Model Water Efficient Landscape Ordinance

The Water Conservation in Landscaping Act was enacted in 2006, requiring the California Department of Water Resources (DWR) to update the Model Water Efficient Landscape Ordinance (MWELO) (California Government Code section 65591-65599). In 2009, the Office of Administrative Law approved the updated MWELO, which required a retail water supplier or a county to adopt the provisions of the MWELO by January 1, 2010, or enact its own provisions equal to or more restrictive than the MWELO provisions (CCR, Tit. 23, Div. 2, Ch. 27, Sec. 492.4).

In response to the Governor's executive order dated April 1, 2015, (EO B-29-15), DWR updated the MWELO and the California Water Commission approved the adoption and incorporation of the updated State standards for MWELO on July 15, 2015. These updated changes have been incorporated into California Code of Regulations (CCR), Tit. 23, Div. 2, Ch. 27, Sec. 490-495. The changes included a reduction to 45 percent for the maximum amount of water that may be applied to a landscape for non-residential projects, which effectively reduces the landscape area that can be planted with high water use plants. The MWELO applies to all types of new construction with a landscape area greater than 500 square feet (the prior MWELO applied to landscapes greater than 2,500 square feet) (CCR Tit. 23, Div. 2, Ch. 27, Sec. 490.1). For non-residential projects, the coverage of high water use plants is reduced due to the new 45 percent water maximum and turf is limited. The City of Susanville has adopted the MWELO.

Senate Bill x7-7 (Chapter 4, Statutes of 2009)

SB x7-7, the Water Conservation Act of 2009, required the State to achieve a 20-percent reduction in urban per capita water use by December 31, 2020. The responsibility for this conservation falls to local water agencies, which must increase water use efficiency through promotion of water conservation standards consistent with the California Urban Water Conservation Council's (CUWCC's) best management practices (BMPs). Each urban retail water supplier is also required to develop urban water use targets and an interim urban water use target by July 1, 2011, based on the alternative methods set out in the 2009 act. The City of Susanville is not a member of the CUWCC and is not a signatory to the memorandum of understanding that commits CUWCC members to implementation of the BMPs.

Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act (SGMA) is codified as Part 2.74 (Sustainable Groundwater Management Act) of the California Water Code (Section 10720 et seq). The regulations adopted to enforce the provisions of the Act are found in Section 350 et seq, Division 2, Chapter 1.5, Subchapter 2 of Title 23 of the California Code of Regulations. The SGMA requires local agencies to form groundwater sustainability agencies (GSAs) for the high and medium priority basins. GSAs develop and implement groundwater sustainability plans to avoid undesirable results and mitigate overdraft within 20 years. In Lassen County, the Act pertains to the Big Valley Groundwater Basin only and is not applicable to the City of Susanville or its vicinity.

Local

Lassen County General Plan - Natural Resources Element

GOAL N-3: Water supplies of sufficient quality and quantity to serve the needs of Lassen County, now and in the future.

- **NR 13 POLICY:** The County recognizes the critical importance and future value of its water resources and shall support the conservation of water supplies and protection of water quality.
- **NR 17 POLICY:** The County supports measures to protect and insure the integrity of water supplies and is opposed to proposals for the exportation of ground water and surface waters from ground water basins and aquifers located in Lassen County (in whole or part) to areas outside those basins.
    - Implementation Measure:

      NR-H The County will maintain ground water ordinances and other forms of regulatory authority to protect the integrity of water supplies in Lassen County and regulate the exportation of water from ground water basins and aquifers in the county to areas outside those basins.
- **NR 19 POLICY:** The County supports control of water resources at the local level, including the formation of local ground water management districts to appropriately manage and protect the long-term viability of ground water resources in the interest of County residents and the County's resources.

Susanville General Plan

GOAL LUD-6: To encourage annexation of lands within the City's sphere of influence that are proposed for urban development and assure logical and continuous growth.

- **LUD-6.6:** Municipal Services Outside the City. The City shall fully use its powers to extend or withhold utilities and services and shall not extend municipal services to areas outside the city, except upon conformance to the City's General Plan and annexation to the city.
- **LUD-6.7:** City-Centered Development. The City shall work with Lassen County and the Susanville Consolidated Sanitary District to establish mutually reinforcing the goal of city-centered development to prevent the conversion of rural, agricultural, forest, and open space lands to urban use inside Susanville's sphere of influence but outside the city limits.

GOAL LUD-10: To promote the orderly expansion of the City that provides additional tax base revenue and provides additional housing and services for existing and future Susanville residents.

- **LUD-10.1:** Service Capacity. The City shall ensure that there is capacity for public services including but not limited to water, wastewater, solid waste, and recycling for future proposed development within the potential annexation area.

Chapter 9, Community Health, Safety, and Conservation

GOAL 4: Provide a consistent supply of high quality water, adequate to meet Susanville's needs.

- **Action program [40]:** Projects that are required to install water systems must have them fully in place and operational before beginning building construction.
  - **Policy ap.** The City shall insure safe drinking water for all residents.
  - **Policy aq.** The City shall protect areas which are critical to the maintenance of water quality, including critical groundwater recharge areas.
  - **Policy as.** The City shall seek controls to protect potential groundwater recharge areas and streamsides from urban encroachment.
  - **Policy ba.** It is City policy that waterways be .kept in their natural state where technically feasible, rather than be concrete-lined, riprapped, or placed underground.
- **Action program [73]:** Recommend that the County eliminate septic tanks and also establish strict standards for new we/is in order to insure proper groundwater quality within the Sphere of Influence.
- **Action program [75]:** Work with the County to preclude construction of impervious surfaces in groundwater recharge areas.
- **Action program [76]:** Work with the County to deny development where urban encroachment will impact groundwater recharge areas.

Susanville Vicinity Area Plan and Environmental Impact Report

E. ISSUE: Water Resources

GOAL AND OBJECTIVE: Protect and maintain resource quality and quantity and promote the appropriate use of surface and ground water resources.

City of Susanville 2020 UWMP

The Urban Water Management Plan (UWMP) is a requirement of the Urban Water Management Planning Act (UWMPA) (Division 6, Part 2.6 of the California Water Code Section 10610-10656). The UWMPs must be prepared every five years and submitted to the Department of Water Resources. The UWMPA applies to urban water suppliers with 3,000 or more connections or supplying more than 3,000 acre-feet (af) (978 MG) of water annually. The City of Susanville is a retail water supplier that operates its water system, Public Water System number 181001. The City does not supply water to other water supply agencies. The volume of water supplied by the City of Susanville in 2020 was 600 Millions of Gallons, with 3,639 municipal connections. The City maintains approximately 60 miles of water main lines that service the customer connections in 6 different pressure zones. The City of Susanville's 2020 UWMP was adopted in August 2022.

WASTEWATER AND STORMWATER

Federal

Clean Water Act

The Clean Water Act (CWA) employs a variety of regulatory and non-regulatory tools to reduce direct pollutant discharges into waterways, finance municipal wastewater treatment facilities, and manage polluted runoff. Those portions of the CWA that relate to wastewater and stormwater discharges are discussed below.

National Pollutant Discharge Elimination System

The National Pollutant Discharge Elimination System (NPDES) permit program was established under the CWA to regulate municipal and industrial discharges to surface waters of the US. NPDES permit regulations have been established for broad categories of discharges including point source waste discharges and nonpoint sources. Each NPDES permit identifies limits on allowable concentrations and mass loadings of pollutants contained in the discharge. Sections 401 and 402 of the CWA contain general requirements regarding NPDES permits. Section 307 of the CWA describes the factors that EPA must consider in setting effluent limits for priority pollutants.

NPDES permits cover various industrial and municipal discharges, including discharges from storm sewer systems in larger cities, stormwater generated by industrial activity, runoff from construction sites disturbing more than 1 acre, and mining operations. Point source dischargers must obtain a discharge permit from the proper authority (usually a state, sometimes EPA, a tribe, or a territory). So-called "indirect" point source dischargers are not required to obtain NPDES permits. "Indirect" dischargers send their wastewater into a public sewer system, which carries it to the municipal sewage treatment plant, through which it passes before entering any surface water.

The CWA was amended in 1987 with Section 402(p) requiring NPDES permits for nonpoint source (i.e., stormwater) pollutants in discharges. Stormwater sources are diffuse and originate over a wide area rather than from a definable point. The goal of the NPDES stormwater regulations is to improve the water quality of stormwater discharged to receiving waters to the "maximum extent practicable" using structural and nonstructural best management practices (BMPs). BMPs can include educational measures (e.g., workshops informing the public of what impacts can result when household chemicals are dumped into storm drains), regulatory measures (e.g., local authority of drainage-facility design), public-policy measures (e.g., labeling storm-drain inlets as to impacts of dumping on receiving waters) and structural measures (e.g., filter strips, grass swales, and detention ponds).

Local

Lassen County General Plan

GOAL L-23: Safe and efficient solid waste treatment and disposal facilities sited and developed so as to protect the public health and minimize environmental impacts and conflicts with surrounding land uses.

- **LU51 POLICY:** In the event that new or expanded solid waste facilities are proposed, the County shall determine and administer the appropriate facility siting process, including environmental review and implementation of land use and facility permitting procedures, in concert with related provisions of the Integrated Waste Management Plan.

Susanville General Plan

See Goals LUD-6, LUD-10 and Goal 4 in the Domestic Water and Groundwater section above. In addition:

- **Action program [58]:** Establish and enforce measures to minimize soil erosion and volume and velocity of surface runoff both during and after construction.

NPDES Permit for the Wastewater Treatment Plant

The Susanville Sanitary District collects and treats wastewater for most of the City of Susanville. The Wastewater Treatment Plant is regulated by Waste Discharge Requirements (WDRs), Board Order No. R6T-2008-0022 A1 (NPDES CA0102695).

ENERGY

Federal

No federal plans, policies, regulations, or laws related to energy are applicable to the project.

State

California Environmental Quality Act

Appendix F of the State CEQA Guidelines sets forth goals for energy conservation, including decreasing per capita energy consumption and reliance on fossil fuels and increasing reliance on renewable energy sources. CEQA requires EIRs to describe potential energy impacts of projects, with an emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy (Public Resources Code [PRC] Section 21100[b][3]).

Building Energy Efficiency Standards

Energy consumption in new buildings in California is regulated by State Building Energy Efficiency Standards contained in Title 24 of the California Code of Regulations. The Building Energy Efficiency Standards are updated every three years. The Energy Code (Title 24, Part 6) contains energy and water efficiency requirements and indoor air quality requirements for newly constructed buildings, additions to existing buildings, and alterations to existing buildings. The most current adopted edition of the Energy Code builds on California's technology innovations, encouraging energy efficient approaches to encourage building decarbonization, emphasizing particularly heat pumps for space heating and water heating. The Energy Code also extends the benefits of photovoltaic and battery storage systems and other demand flexible technology to work in combination with heat pumps to enable California buildings to be responsive to climate change. This update provides crucial steps in the state's progress toward 100 percent clean carbon neutrality by mid-century. CALGreen is contained in Title 24, Part 11, and includes voluntary energy efficiency provisions.

Integrated Energy Policy Report

The California Energy Commission (CEC) prepares an integrated policy report every two years that assesses major energy trends and issues facing the State's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the State's economy; and protect public health and safety. Energy efficiency is one of the key components of the state's strategy to reduce greenhouse gas emissions (GHGs) and to achieve reduction targets set forth by AB 32, SB 32, and Governor Brown's Executive Order B-30-15. Efficiency achieved through building codes, appliance standards, and ratepayer-funded programs has had a positive effect on GHG emissions in recent years. The most currently adopted 2023 Integrated Energy Policy Report indicates that residential and non-residential buildings account for 25 percent of the State's GHG emissions and that decarbonizing buildings is a fundamental part of meeting the state's climate goals (CEC 2024).

Energy Efficiency Strategic Plan

The California Public Utilities Commission (CPUC) 2008 Energy Efficiency Strategic Plan established goals of having all new residential construction in California be zero net energy (ZNE) by 2020 and all new commercial construction ZNE by 2030 (CPUC 2008). The Strategic Plan was subsequently updated in January 2011 to include a lighting chapter.

Clean Energy and Pollution Reduction Act

On October 7, 2015, the Clean Energy and Pollution Reduction Act (SB 350) was signed into law, establishing new clean energy, clean air and GHG reduction goals for 2030 and beyond. SB 350 codifies Governor Brown's clean energy goals to increase California's renewable electricity procurement goal from 33 percent by 2020 to 50 percent by 2030, and is part of California's overall strategy to address climate change. SB 350 enhances the state's ability to meet its long-term climate goal of reducing GHG emissions to 40 percent of 1990 levels by 2030 and 80 percent below 1990 levels by 2050.

California Code of Regulations, Energy Efficiency Standards

Energy consumption in new buildings in California is regulated by State Building Energy Efficiency Standards (CALGreen) contained in the California Code of Regulations, Title 24, Part 2, Chapter 2-53. Title 24 applies to all new construction of both residential and nonresidential buildings, and regulates energy consumed for heating, cooling, ventilation, water heating, and lighting. The 2016 Building Energy Efficiency Standards have improved efficiency requirements from previous codes and the updated standards are expected to result in a statewide consumption reduction (CEC 2015).

Local

Susanville Vicinity Area Plan

Land Use/Growth and Development

H: ISSUE: Energy Use

GOAL AND OBJECTIVE: Promote conservative, efficient and cost effective energy consumption through the utilization of natural energy related resources and practices (geothermal, solar, etc.)

Environmental/Natural Resource

J. ISSUE: Energy Production

GOAL AND OBJECTIVE: Provide for the development and efficient use of existing and appropriate new energy sources.

- **Policy 8.1:** Lassen County should protect, maintain and establish scenic corridors in order to preserve the beauty of its landscapes. The scenic corridors designated are shown on the land use map. These corridors shall protect the visual quality of unique scenic resources.
  - **Implementation**

    8.16 Utilities in the scenic corridors should be placed underground whenever possible.

SOLID WASTE

Federal

No federal plans, policies, regulations, or laws related to solid waste are applicable to the project.

State

California Building Standards Code

CALGreen establishes mandatory minimum green building standards and requirements for construction and demolition (C&D) material diversion. Under Section 5.408 of the CALGreen Code, projects involving C&D activities are required to recycle and/or salvage for reuse a minimum of 65 percent of their nonhazardous C&D material. Applicable projects are required to prepare and implement a construction waste management plan.

California Integrated Waste Management Act of 1989

The California Integrated Waste Management Act (CIWMA) of 1989 created the California Integrated Waste Management Board, now known as CalRecycle. CalRecycle is the agency designated to oversee, manage, and track California's 92 million tons of waste generated each year. CalRecycle promotes a sustainable environment in which these resources are not wasted but can be reused or recycled. In addition to many programs and incentives, CalRecycle promotes the use of new technologies to divert resources away from landfills. CalRecycle is responsible for ensuring that waste management programs are carried out primarily through local enforcement agencies.

The CIWMA is the result of two pieces of legislation: Assembly Bill (AB) 939 and Senate Bill (SB) 1322. The CIWMA was intended to minimize the amount of solid waste that must be disposed of through transformation and land disposal by requiring all cities and counties to divert 25 percent of all solid waste from landfill facilities by January 1, 1995, and 50

percent by January 1, 2000. The 50 percent diversion requirement is measured in terms of per capita disposal expressed as pounds per day per resident and per employee. The per capita disposal and goal measurement system uses an actual disposal measurement based on population and disposal rates reported by disposal facilities, and it evaluates program implementation efforts.

Mandatory Commercial Recycling Requirements

AB 341 requires CalRecycle to issue a report to the legislature that includes strategies and recommendations that would enable the State to recycle 75 percent of the solid waste generated in the State by January 1, 2020; requires businesses that meet specified thresholds in the bill to arrange for recycling services by July 1, 2012; and also streamlines various regulatory processes.

Mandatory Commercial Organics Recycling Requirements

AB 1826 requires businesses to recycle their organic waste (e.g., food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste), depending on the amount of waste they generate per week. This law also requires local jurisdictions across the State to implement an organic waste recycling program to divert organic waste generated by businesses.

Short-Lived Climate Pollutant Reduction Strategy

SB 1383, signed into law in September 2016, establishes methane emissions reduction targets in a Statewide effort to reduce emissions of short-lived climate pollutants in various sectors of California's economy. As it pertains to solid waste, SB 1383 establishes targets to achieve a 50-percent reduction in the volume of statewide disposal of organic waste from 2014 levels by 2020 and a 75-percent reduction by 2025. The law grants CalRecycle the regulatory authority required to achieve the organic waste disposal reduction targets and establishes an additional target that not less than 20 percent of currently disposed edible food is recovered for human consumption by 2025.

Mandatory Recycling and Organics Recycling Bins

Effective July 1, 2020, AB 827 mandates food service establishments to provide customers with disposal containers for food scraps, recyclables, and trash generated from products purchased and consumed onsite. Businesses subject to this law are businesses subject to Mandatory Commercial Recycling and Mandatory Commercial Organics Recycling requirements, as well as any food generating establishment where customers bus their own tables, such as fast-food restaurants.

Local

Lassen County General Plan

16. ISSUE: Solid Waste Facilities

GOAL L-23: Safe and efficient solid waste treatment and disposal facilities sited and developed so as to protect the public health and minimize environmental impacts and conflicts with surrounding land uses.

- **LU51 POLICY:** In the event that new or expanded solid waste facilities are proposed, the County shall determine and administer the appropriate facility siting process, including environmental review and implementation of land use and facility permitting procedures, in concert with related provisions of the Integrated Waste Management Plan.

Susanville General Plan

- **Policy b.** The City shall attempt to reduce the generation of trash and will encourage private enterprise to do the same.
- **Policy d.** The City shall encourage innovative and non-traditional approaches to using or disposing of garbage.
- **Action program [2]:** Encourage the County to require trash collection in the City's Sphere of Influence —and in other areas—when urban density is reached.
- **Action program [5]:** Limit local product packaging to bio-degradable materials.

3.11.2 Environmental Setting

Public utilities in the project area are provided by various entities, as identified in Table 3.11-1 and discussed in detail below.

Table 3.11-1 Utility Service Providers for the Project Site

Utility	Agency/Provider
Water Supply	City of Susanville
Wastewater Collection, Conveyance, and Treatment	Susanville Sanitation District
Solid Waste Collection	Lassen Regional Solid Waste Management Authority
Electrical Service	Lassen Municipal Utility District
Natural Gas	City of Susanville

Source: Data compiled by Ascent in 2024.

WATER SUPPLY

According to the City of Susanville Urban Water Management Plan 2020 Update (City of Susanville 2022), the City of Susanville currently provides water services to the city. The city's water needs are met by utilizing water provided by two springs and four groundwater wells: Bagwell Springs (located one mile north of the city); Cady Springs (located two miles west of the city); and Well #1, Well #3, Well #4, and Well #5 (located southeast in the city). Water from these wells is primarily utilized during the summer to supplement increased demands. Total water source annual capacity is 2,785.70 millions of gallons (MG) (City of Susanville 2022).

Table 3.11-2 illustrates the projected water demand from 2025 through 2045 in millions of gallons per year based on sector. The sector amounts of water usage are based on future population projections, target reductions in Gross Per Capita per Day (gpcd), and the current sector percentage as per current utility metered water usage. The sector breakdown is single family (61.1 percent), multi-family (11.7 percent), and commercial (27.2 percent), which together make up 100 percent of total water use customers. Per the 2020 UWMP, it is not anticipated that future growth will make significant shifts in sector percentages (City of Susanville 2022).

Table 3.11-2 Projected Gross Demands for Potable and Raw Water – 2025 to 2045

Use Type	Projected Water Use (in MG)				
	2025	2030	2035	2040	2045
Single Family	410	415	421	427	432
Multi-Family	78	79	80	81	83
Commercial	182	185	187	190	193
Other (System Losses)	157	156	155	153	152
Total	**827**	**835**	**843**	**851**	**860**

Source: City of Susanville 2022.

Based on the water demand projections from the 2020 UWMP Update, shown in Table 3.11-2, in 2045 the total demand is projected to be 860 MG. It is conservatively anticipated that springs will supply 80 percent (688 MG) of this demand, and the remaining 20 percent (172 MG) will be supplied by groundwater pumping.

Based on future water demand projections, Table 3.11-3 summarizes the Reasonably Available Volume and the Total Right or Safe Yield for each of the City's six water sources. As indicated in the table below, the City has ample water rights and capacity for the projected future demand.

Table 3.11-3 Water Sources Production Capacity Summary

Water Source Type	Water Source Name	Reasonably Available Volume (MG)	Water Source Total Right or Safe Yield (MG)
Spring	Cady Springs	435	500
Spring	Bagwell Springs	387	400
Well	Well #1 (Bunyan)	251	323
Well	Well #3	480	617
Well	Well #4	251	323
Well	Well #5 (College)	251	322
Total		**2,055**	**2,485**

Source: City of Susanville 2022.

During drought years, water use patterns typically change. Outdoor water use will typically increase as irrigation is used to replace the decrease in precipitation. When necessary, the increase in outdoor use can be offset, in part, by increasing mandatory conservation measures. Surface water, or springs, are more affected by drought conditions than wells. The springs historically have produced above 900 MG and even during drought years the springs consistently produce above 800 MG. As a result, 822 MG was determined a reasonably available flow for springs and 1,233 MG as a reasonably available flow for wells giving a total reasonably available volume of 2,055 MG.

The city has historically used mostly spring sources to meet their water demands. However, the city also has sufficient groundwater supply to meet 100 percent of the water demand if needed. Groundwater supplies are not immediately impacted by droughts, and, as a result, there is no history of any water supply deficiencies for the city water system.

Although the City could lose any single source, for the entire year, which is unlikely, the city would still maintain the 2,055 MG reasonable available volume. Because of the diversity of supply options, the city owns the reasonable available supply remains constant at 2,055 MG even during several years of drought (Table 3.11-4).

Table 3.11-4 Multiple Dry Years Supply and Demand Comparison (in MG)

Years		2025	2030	2035	2040	2045
First Year	Supply Totals	2,055	2,055	2,055	2,055	2,055
	Demand Totals	790	800	810	821	832
	Difference	1,265	1,255	1,245	1,234	1,223
Second Year	Supply Totals	2,055	2,055	2,055	2,055	2,055
	Demand Totals	790	800	810	821	832
	Difference	1,265	1,255	1,245	1,234	1,223
Third Year	Supply Totals	2,055	2,055	2,055	2,055	2,055
	Demand Totals	790	800	810	821	832
	Difference	1,265	1,255	1,245	1,234	1,223
Fourth Year	Supply Totals	2,055	2,055	2,055	2,055	2,055
	Demand Totals	790	800	810	821	832
	Difference	1,265	1,255	1,245	1,234	1,223
Fifth Year	Supply Totals	2,055	2,055	2,055	2,055	2,055
	Demand Totals	790	800	810	821	832
	Difference	1,265	1,255	1,245	1,234	1,223
Sixth Year	Supply Totals	2,055	2,055	2,055	2,055	2,055
	Demand Totals	790	800	810	821	832
	Difference	1,265	1,255	1,245	1,234	1,223

Source: City of Susanville 2022.

WASTEWATER AND STORMWATER

Wastewater Treatment and Disposal

The city does not own or operate a wastewater treatment facility. The city's collected wastewater is handled by the Susanville Sanitary District, as further described below. The Susanville Sanitary District (District) provides the city sewer system. Currently, the District provides wastewater collection and tertiary wastewater treatment. The District's boundaries encompass approximately 6.2 square miles. With a few exceptions, the boundaries are contiguous to the city limits. The District has approximately 3,595 connections out of which 3,199 are residential, 387 are commercial, and nine are industrial.

Wastewater is collected through 60 miles of gravity-fed pipelines and one mile of pressure sewer mains. The Wastewater Treatment Plant (WWTP) treats approximately 1.0 million gallons of wastewater per day during dry weather and approximately 1.2 million gallons per day (mgd) in wet weather. The WWTP has the capacity to treat and discharge 2.0 mgd average monthly flow and 3.1 mgd during peak wet weather flow, with a maximum hydraulic capacity of 4.0 mgd.

Stormwater Facilities

The project site includes an existing 24-inch culvert under SR 36 (Figure 2-8). No additional stormwater facilities are currently located on the project site.

ENERGY

Electricity

Lassen Municipal Utility District (LMUD) provides electricity services. Existing overhead electrical lines are located along Skyline Road and adjacent to SR 36. LMUD owns 425 miles of distribution lines, 80 miles of 60-kV transmission lines and operates nine substations served by their 60-kV transmission system.

Natural Gas

The City of Susanville currently provides natural gas services to the city, which is fed by a high-pressure mainline lateral that receives gas from the Tuscarora Gas Transmission Company. Tuscarora is an interstate natural gas pipeline system with a design capacity of approximately 230 million cubic feet per day. No natural gas lines are currently located on the project site.

3.11.3 Environmental Impacts and Mitigation Measures

ANALYSIS METHODOLOGY

Potential impacts on utilities that would result from the project were identified by comparing existing service capacity against future demand associated with project implementation. Where possible, a quantitative comparison has been made to determine impacts of the project on future demands. Evaluations of potential utilities impacts are based on a review of documents pertaining to the project area, including the City of Susanville General Plan, City of Susanville 2020 UWMP, and a review of appropriate facilities for water, sewer, and solid waste systems and their subsequent capacity. Additional information was obtained through consultation with appropriate agencies and a review of letters received during public scoping (such as the letter from the Susanville Sanitary District, see Appendix J).

Water Demand

CEQA Guidelines Section 15155 requires preparation of a water supply assessment (WSA) when a project is of sufficient size to be defined as a "water-demand project." A WSA must be undertaken to determine water supply sufficiency for a 20-year projection in addition to the demand of existing and other planned future uses for any project that is subject to CEQA and proposes (1) residential development of more than 500 dwelling units; (2)

commercial development of more than 250,000 square feet of floor space; (3) a retail center with more than 500,000 square feet of floor space; (4) a hotel or motel having more than 500 rooms; (5) an industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area; (6) a mixed-use project that includes one or more of the projects specified above; or (7) a project that will demand an amount of water equal to, or greater than, the amount of water required by 500 dwelling units. Because the project does not fall under any of the identified parameters, no WSA is required for the project.

During operation, the project would have an estimated water demand of approximately 7,000 to 9,000 gpd (2.5 to 3.3 million gallons per year [MGY]) or 7.8 to 10.1 acre-feet per year (AFY). Impacts on water demand was evaluated using the Water Enterprise Financial Analysis and Rate Study for City of Susanville (IG Service 2024) and the City of Susanville 2020 UWMP.

Wastewater Treatment and Disposal

Impacts related to wastewater conveyance and treatment capacity were evaluated by estimating the project-generated increase in wastewater and determining whether the existing wastewater treatment and conveyance infrastructure has adequate capacity to accommodate the increase. As mentioned above, the WWTP has the capacity to treat and discharge 2.0 mgd. Assuming all water used by the project (approximately 7,000 to 9,000 gpd/2.5 to 3.3 MGY) resulted in an equal amount of wastewater generated, the additional 9,000 gpd/3.3 MGY would be well within the WWTP's ability to treat and discharge the generated wastewater.

Stormwater

Stormwater would be drained toward the four onsite bioretention facilities (shown in Figure 2-3) with any overflow draining to the drainage swale alongside the abandoned railroad right-of-way, before connecting with the existing 24-inch culvert under SR 36 (Figure 2-8). Impacts to stormwater were evaluated through analysis of site plans and estimating stormwater drainage capacity.

Energy

Electricity

Existing overhead electrical lines are located along Skyline Road and adjacent to SR 36. Existing lines that are within the construction footprint of the project would be relocated prior to construction. Impacts to electricity transmission were evaluated through analysis of the project's energy consumption versus available supply.

Natural Gas

Natural gas would be brought to the site via a trench within the outer limits of the City/Caltrans right-of-way. Impacts to natural gas transmission were evaluated through analysis of the project's energy consumption versus available supply.

THRESHOLDS OF SIGNIFICANCE

Appendix G of the CEQA Guidelines, which is a sample Initial Study checklist, includes inquiries regarding the environmental impacts of, among many other things, utilities and service systems. It is a common practice for lead agencies to use the inquiries found in Appendix G for purposes of fashioning significance thresholds. Here, the City, in its discretion has done so. Accordingly, a utilities and service systems impact is considered significant if implementation of the project would do any of the following:

- require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects;
- the water service provider would not have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years;

- result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments;
- generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; and/or
- fail to comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

ISSUES NOT DISCUSSED FURTHER

Water Supply

As discussed in the Initial Study prepared for the project (Appendix A), the project would have an estimated water demand of approximately 7,000 to 9,000 gpd, 2.5 to 3.3 MGY, or 7.8 to 10.1 AFY during operations. Per the Water Enterprise Financial Analysis and Rate Study for City of Susanville (IG Service 2024), Susanville's water supply is naturally occurring and locally available and the overall system is capable is delivering nearly twice the daily peak demand. Additionally, the City of Susanville's UWMP identifies city water customer needs are met by utilizing water from Bagwell, Cady Springs, and four groundwater wells (City of Susanville 2022). As identified in the UWMP, the city has a water source annual capacity of 2,785.70 MG (or approximately 9,948 acre feet). This figure is considerably greater in wet years as Cady Springs produces an annual average of 473 million gallons in a dry year to 788.4 million gallons in a wet year, approximately 49 percent more. The City thus has ample water rights and capacity for the projected future demand of the project (2.5 to 3.3 MGY, or 7.8 to 10.1 AFY) and future demand of other residential and commercial consumers. Therefore, the City of Susanville would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years. This topic is not discussed further.

Wastewater Treatment Provider Capacity

According to the Susanville Sanitary District, the Susanville WWTP treats approximately 1.0 million gallons of wastewater per day during dry weather and approximately 1.2 mgd in wet weather. The WWTP has the capacity to treat and discharge 2.0 mgd average monthly flow and 3.1 mgd peak wet weather flow, with a maximum hydraulic capacity of 4.0 mgd. The typical water demand to sewer demand ratio is 1.15:1, meaning that for every 115 gallons of water consumed, 100 gallons of wastewater would be generated. However, assuming all water used by the project (approximately 7,000 to 9,000 gpd or 7.8 to 10.1 AFY) resulted in an equal amount of wastewater generated, the additional 9,000 gpd would be well within the WWTP's ability to treat and discharge the generated wastewater. Therefore, the WWTP has sufficient capacity to serve the project's projected demand, in addition to existing use. This topic is not discussed further.

Solid Waste

Project construction would generate standard construction and demolition debris, which may include concrete, asphalt, wood waste, glass, metals, gypsum, and cardboard. Earthmoving activities would not generate large amounts of soil waste because cut and fill for finish grading would be balanced onsite. Demolition activities would be minor as the current site is vacant land. All waste would be disposed of and recycled according to all federal, State, and local solid waste requirements, including AB 939 and the CALGreen Building Code.

As discussed in the Initial Study prepared for the project (Appendix A), project operations are estimated to generate approximately 426 pounds (0.213 tons) of solid waste per day. This estimate is based on CalRecycle's reference list of solid waste generation rates and accounts for all materials discarded, whether or not they are later recycled or disposed of in a landfill (CalRecycle 2019). The solid waste generated by project operations would represent 0.35 percent of the annual waste accepted by Bass Hill landfill, the nearest landfill to the project site, and 0.071 percent of the landfill's maximum daily throughput.

Based on the total available capacity of the landfill, the incremental increase in solid waste generated as a result of the project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. In addition, the project does not include any component that would conflict with regulations governing construction or operational solid waste diversion and would comply pursuant to local implementation requirements. This topic is not discussed further.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 3.11-1: Significant Environmental Effects from the Relocation or Construction of New or Expanded Utility Infrastructure

The project would require the construction of a new offsite water, gas, and sewer line, stormwater drainage features, and connections to existing utility facilities and infrastructure to serve the new development. Additionally, an existing power pole located within the construction footprint may be relocated prior to construction. Impacts associated with the proposed utility improvements are evaluated and disclosed throughout this EIR. All impacts associated with constructing the proposed offsite utility improvements would be **less than significant**.

Water

As discussed above in Section 3.11.2, "Environmental Setting," the project would have an overall estimated water demand up to approximately 9,000 gpd, or approximately 3.3 MGY, or 10.1 AFY during operation. The projected water demand would be served by the city. The city's water needs are met by utilizing water from two springs and four groundwater wells, as detailed above.

Table 3.11-3 summarizes the Reasonably Available Volume and the Total Right or Safe Yield for each of the City's six water sources, resulting in a reasonably available volume of 2,055 MG. Because of the diversity of springs and wells within the city's supply system, the reasonable available supply remains constant at 2,055 MG even during several years of drought (Table 3.11-4). The project's estimated water demand of approximately 9,000 gpd or 3.3 MGY is well within the city's available water yield, representing 0.16 percent of the reasonably available volume. As a result, the city has ample water rights and capacity for the projected future demand.

As discussed in Section 2, "Project Description," proposed offsite utility improvements, would provide water to the site. As proposed, water and gas would be conveyed to the project site via a trench within the outer limits of the City right-of-way. Water and gas would be brought to the site from Johnstonville Road via Skyline Road (Figure 2-8). The water and gas lines would be trenched either side of the Susan River but would be pumped through a pipe that would be hung from the side of the bridge on Skyline Road over the Susan River.

The proposed water line and appurtenances would be installed in accordance with the City's conditions of approval and design standards and specifications. All water facilities would be installed within dedicated public right-of-way and public utility easements to allow unobstructed access for the maintenance, repair, connection, and operation of water facilities. Therefore, the project would not exceed the existing capacity of the City's water system infrastructure such that it would require the construction or relocation of new or expanded infrastructure other than the installation of pipelines to connect to the water main.

Wastewater

As discussed in Section 2, "Project Description," the proposed sewer line route would connect from the site at a point approximately 600 ft north from the SR 36/Riverside Drive intersection and would be bored under the Caltrans right-of-way from the west side of SR 36 to the east side of SR 36. The sewer would then be trenched either side of the Susan River and then would be pumped through a pipe that would be hung from the eastern (downstream) side of the SR 36 bridge over the Susan River, before tying into the existing sanitary sewer manhole at the SR 36/Riverside Drive intersection (Figure 2-8). In addition, the Susanville Sanitary District has issued a statement of intent to own and operate the sewer line serving the Travel Stop, and has requested that the district submit a joint annexation application to LAFCO with the City of Susanville (Appendix J).

As detailed in Section 3.11.2, "Environmental Setting," the Susanville WWTP currently treats up to approximately 1.2 mgd. Therefore, the facility has sufficient capacity to accommodate up to 9,000 gpd of additional wastewater produced by the project. Along with the proposed sewer line, projected wastewater flows could be accommodated by Susanville's WWTP's existing wastewater infrastructure and the existing wastewater treatment facility for the City of Susanville. Therefore, the project would not require an expansion of existing wastewater treatment facilities or infrastructure other than the installation of pipelines to connect to the sewer system.

Stormwater Drainage

The project would result in a net increase of approximately 348,759 sf in impervious surfaces from the construction of the proposed buildings, fueling stations, and paved parking areas. Stormwater from the travel center and parking areas would be drained south and southeast toward the proposed four onsite bioretention basins (shown in Figure 2-3 and Figure 2-8). The bioretention basins would range in size from 6,272 SF to 86,247 SF, with the bottom area of the bioretention basins approximately 112,373 SF. From the onsite bioretention facilities, stormwater would flow through a new underground drainage pipe that would discharge southeast to an existing 24" drainage culvert located under SR 36. Any onsite overflow would be captured by the drainage swale along the abandoned Union Pacific Railroad right-of-way before flowing into the existing culvert, thus there is sufficient storage capacity available. In addition, for all construction activities disturbing one acre of land or more, California also mandates the development and implementation of Stormwater Pollution Prevention Plans (SWPPP). The SWPPP documents the selection and implementation of BMPs to prevent discharges of water pollutants to surface or groundwater. The SWPPP also charges owners with stormwater quality management responsibilities. The developer or contractor for a construction site subject to the General Permit must prepare and implement a SWPPP that meets the requirements of the General Permit. During construction, per the NPDES Construction General Permit, the project would be required to implement a SWPPP that includes BMPs to reduce pollutants in stormwater runoff from the project site. The SWPPP would include site design measures to minimize offsite stormwater runoff that might otherwise affect surrounding habitats. The Lahontan Regional Water Quality Control Board would review and monitor the effectiveness of the SWPPP through mandatory reporting by the city and the contractor as required. The installation of proposed storm drains, bioretention basins, and project grading would result in stormwater control and prevent drainage and water quality impacts.

Electric Power and Natural Gas

As discussed in Section 2, "Project Description," construction activities would require the consumption of diesel fuel associated with the operation of heavy-duty construction equipment, material deliveries, and debris hauling; gasoline associated with worker commute trips; and minor amounts of electricity associated with operation of electric-powered construction equipment. Construction-related energy use would represent a small demand on local and regional fuel and electricity supplies that could be accommodated by existing facilities and infrastructure. In addition, construction of the proposed project may require the relocation of an existing power pole located within the construction footprint at the east corner of the project site, near the intersection of Skyline Road and SR 36 (Figure 2-3). Furthermore, as detailed above, the proposed gas line would be piped alongside the water line via a trench and then pumped through a pipe that would be hung from the side of the bridge on Skyline Road over the Susan River. The environmental impacts associated with construction and installation of the pipeline, including potential air quality, greenhouse gas emissions, biological resources, and geology and soils, are analyzed as part of the Project in this EIR.

As described, the project site is located within the service territory of Lassen Municipal Utility District for electricity and the City of Susanville for natural gas. During operations, the project would require the consumption of approximately 1,086 megawatt hours (MWh) per year of electricity and 1,123 metric million British thermal units per year (MMBtu) per year of natural gas associated with the proposed on-site land uses (refer to Section 3.5 for additional information). Tuscarora has a design capacity of approximately 230 million cubic feet per day, thus more than sufficient capacity to supply the project via the Susanville lateral. The estimated energy demand is conservative because it does not reflect the anticipated increase in building energy efficiency that technological advances will provide over time. All project buildings would meet the Title 24 building efficiency standards in effect at the time of construction. In addition, the project would include solar panels which would be installed in accordance with the California Energy Code requirements and would produce an estimated 51,000 kWh/year, along with the EV

charging/EV capable/EV ready spaces mentioned previously, which would be provided in accordance with the CALGreen code. The estimated energy demand from operations would not require the expansion of the city's existing electrical facilities and infrastructure. Furthermore, towards the end of 2026 (LMUD 2025), the Skedaddle Substation project will become operational, which will improve the capacity, efficiency and reliability of service to the LMUD system and to improve voltage conditions during summer peak load conditions, which would further ensure LMUD can provide service to the project. Therefore, the project would not result in any new or expanded energy facilities or infrastructure other than the installation of pipelines to connect to the gas main.

Telecommunications

The project site is within Frontier Communications service area. Frontier Communications is anticipated to have adequate service and facilities to meet the requirements of the project and would be able to provide telephone and data services for the project with minimal installation requirements (Frontier 2025). Additionally, Starlink provides satellite high-speed internet which would also require minimal installation. Therefore, impacts would not result in demand for telecommunication facilities such that it would require the construction of new or expanded telecommunications infrastructure, the construction of which could result in significant environmental effects.

Summary

As summarized above and substantiated throughout this EIR, impacts associated with constructing the proposed utility infrastructure would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

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4 CUMULATIVE IMPACTS

4.1 INTRODUCTION TO THE CUMULATIVE ANALYSIS

This draft environmental impact report (Draft EIR) provides an analysis of cumulative impacts of the proposed project taken together with other past, present, and probable future projects producing related impacts, as required by Section 15130 of the Guidelines for Implementation of the California Environmental Quality Act (State CEQA Guidelines). The goal of such an exercise is twofold: first, to determine whether the overall long-term impacts of all such projects would be cumulatively significant; and second, to determine whether the incremental contribution to any such cumulatively significant impacts by the project would be "cumulatively considerable" (and thus significant). (See State CEQA Guidelines Sections 15130[a]–[b], Section 15355[b], Section 15064[h], and Section 15065[c]; and *Communities for a Better Environment v. California Resources Agency* [2002] 103 Cal. App. 4th 98, 120.) In other words, the required analysis intends first to create a broad context in which to assess cumulative impacts, viewed on a geographic scale beyond the project site itself, and then to determine whether the project's incremental contribution to any significant cumulative impacts from all projects is itself significant (i.e., "cumulatively considerable").

Cumulative impacts are defined in State CEQA Guidelines Section 15355 as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." A cumulative impact is "the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time" (State CEQA Guidelines Section 15355[b]).

Consistent with State CEQA Guidelines Section 15130, the discussion of cumulative impacts in this Draft EIR focuses on significant and potentially significant cumulative impacts. Section 15130(b) of the State CEQA Guidelines provides, in part, the following:

> [t]he discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact.

A proposed project is considered to have a significant cumulative effect if:

- the cumulative effects of development without the project are not significant and the project's additional impact is substantial enough, when added to the cumulative effects, to result in a significant impact; or
- the cumulative effects of development without the project are already significant and the project contributes measurably to the effect.

The term "measurably" is subject to interpretation. The standards used herein to determine measurability are that the impact must be noticeable to a reasonable person, or must exceed an established threshold of significance (defined throughout the resource sections in Chapter 3 of this Draft EIR).

4.2 GEOGRAPHIC CONTEXT

The geographic area that could be affected by the project and is appropriate for a cumulative impact analysis varies depending on the environmental resource topic, as presented in Table 4-1.

Table 4-1 Geographic Scope of Cumulative Impacts

Resource Topic	Geographic Area
Aesthetics	Key viewpoints defined in Section 3.1, "Aesthetics," including areas with views to and from the project site
Agricultural and Forestry Resources	Not applicable. This topic has been eliminated from further discussion in the Initial Study because the project would not result in significant impacts on agricultural and forestry resources (refer to Appendix A)
Air Quality	Northeast Plateau Air Basin (NEPAB)
Biological Resources	Lassen County
Cultural Resources	Lassen County
Energy	Lassen Municipal Utility District (LMUD) and Plumas-Sierra Rural Electric Cooperation service areas
Geology and Soils	Project site, including all areas of ground disturbance and new permanent Structures and offsite utility areas; Lassen County for paleontological resources
Greenhouse Gas Emissions	Planet Earth
Hazards and Hazardous Materials	Not applicable. This topic has been eliminated from further discussion in the Initial Study because the project would not result in significant impacts on hazards and hazardous materials (refer to Appendix A)
Hydrology and Water Quality	Not applicable. This topic has been eliminated from further discussion in the Initial Study because the project would not result in significant impacts on hydrology and water quality (refer to Appendix A)
Land Use and Planning	Not applicable. This topic has been eliminated from further discussion in the Initial Study because the project would not result in significant impacts on land use and planning (refer to Appendix A)
Mineral Resources	Not applicable. This topic has been eliminated from further discussion in the Initial Study because the project would not result in significant impacts on mineral resources (refer to Appendix A)
Noise and Vibration	Project site, including all areas of ground disturbance and new permanent structures and offsite utility areas
Population and Housing	Not applicable. This topic has been eliminated from further discussion in the Initial Study because the project would not result in significant impacts on population and housing (refer to Appendix A)
Public Services	Not applicable. This topic has been eliminated from further discussion in the Initial Study because the project would not result in significant impacts on public services (refer to Appendix A)
Recreation	Not applicable. This topic has been eliminated from further discussion in the Initial Study because the project would not result in significant impacts on recreation (refer to Appendix A)
Transportation/Traffic	Project area and the surrounding roadway network
Tribal Cultural Resources	Historic geographic areas related to local Native American tribes within Lassen County
Utilities and Service Systems	Service areas of City of Susanville, Susanville Consolidated Sanitary District (District), and Lassen Municipal Utility District (LMUD)
Wildfire	Not applicable. This topic has been eliminated from further discussion in the Initial Study because the project is not within or near state responsibility areas or lands classified as very high fire hazard severity zones and would not result in impacts on wildfire (refer to Appendix A).

Source: Compiled by Ascent in 2025.

4.3 RELATED PROJECTS

Table 4-2 includes a list of present and reasonably foreseeable future projects within the City of Susanville. A list of past projects was not included in Table 4-2 because the environmental effects of these actions are already considered as part of the existing baseline cumulative condition. Table 4-2 includes projects for which a development application has been submitted or is anticipated to be submitted within the next year and projects that are currently undergoing environmental review or construction within the city limits.

Table 4-2 Present and Reasonably Foreseeable Future Projects

Project Name	Details	Distance from Project Site	Construction Status
Thompson Family Trust 70 Space RV Park	70 Space RV Park, located at 300 Bella Way, Susanville, CA 96130	0.48 miles	Anticipated to break ground in 2025
Hat Creek Mine Project	Located on approx. 460 acres of a 640-acre parcel, located approximately 1.5 miles east of State Route 139 off of Skyline Road to the northeast of Susanville in Lassen County (APN 101-110-024)	1.10 miles at its closest part	Mining operations are estimated to begin in the spring of 2025, following permit approval
Johnstonville Road Gas and Water Line Upgrades	Increase water main line to 12" and increase gas line to 8"	0.5 miles	TBD
Use Permit #2025-003 Cunningham Properties LLC-Verizon	Construction of an 88-foot Verizon Wireless co-location concealed tree tower, antennas, support equipment, emergency backup generator, and 30-foot by 30-foot screened equipment enclosure area next to 704-485 Richmond Road E in the City of Susanville.	2.2 miles	TBD, but project will be completed in 8 weeks.
Wireless Communication Facility Use Permit	Applicants are proposing the construction of a 125' monopine tower to be located at APN 119-230-33 at 471-485 Sierra Road Standish, CA 96128.	10.8 miles	TBD
Alturas Ranch Floating Solar Array	Installation of a 449-acre 277.9 MW DC floating solar array on an irrigation pond and interconnection substation, 4-miles north of Termo, CA.	34.8 miles	40 months

Source: Compiled by Ascent in 2025, based off information provided by the City of Susanville and from Lassen County website

In addition to the cumulative projects listed in Table 4-2, there could also be growth and development within the surrounding unincorporated areas of Lassen County, which could result in cumulative impacts when considered with the proposed project. Growth and development within the county has been planned and accounted for within the County's General Plan. Specifically, the County's 2024-2029 Housing Element determined that the population has declined by approximately seven percent between 2010 and 2021 (Lassen County 2025). Furthermore, the Regional Housing Needs Allocation (RHNA), which determines the projected and existing housing needs for each local jurisdiction in California, assigned to Lassen County for the 7th Planning Cycle (i.e., used in the 2024-2029 Housing Element) consisted of two units (Lassen County 2025). A RHNA of two units signifies that the County has a housing stock that is adequate to meet the needs of its population and that the County is not projecting substantial growth that would outpace its current housing stock over the next six years (2024-2029). The County's RHNA in addition to its declining population indicate that the County is anticipated to experience slow growth throughout the foreseeable future.

4.4 ANALYSIS OF CUMULATIVE IMPACTS

The following sections contain a discussion of the cumulative effects anticipated from implementation of the project, together with related projects and planned development in the City of Susanville, for each of the 11 environmental issue areas evaluated in this Draft EIR. The analysis conforms with Section 15130(b) of the State CEQA Guidelines,

which specifies that the "discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact."

When considered in relation to other reasonable foreseeable projects, cumulative impacts to some resources would be significant and more severe than those caused by the proposed project alone.

For purposes of this EIR, the project would result in a significant cumulative effect if:

- the cumulative effects of related projects (past, current, and probable future projects) are not significant and the incremental impact of implementing the project is substantial enough, when added to the cumulative effects of related projects, to result in a new cumulatively significant impact; or
- the cumulative effects of related projects (past, current, and probable future projects) are already significant and implementation of the project makes a considerable contribution to the effect. The standards used herein to determine a considerable contribution are that either the impact must be substantial or must exceed an established threshold of significance.

This cumulative analysis assumes that all mitigation measures identified in Chapter 4 to mitigate project impacts are adopted and implemented, and all elements of the design build performance criteria that would minimize environmental effects are implemented. The analysis herein analyzes whether, after implementation of project-specific mitigation and performance criteria that minimize environmental effects, the residual impacts of the project would cause a cumulatively significant impact or would contribute considerably to existing/anticipated (without the project) cumulatively significant effects. Where the project would so contribute, additional mitigation is recommended where feasible.

4.4.1 Aesthetics

As described in Section 3.1, "Aesthetics," the thresholds adopted from Appendix G related to scenic resources within a state scenic highway and creating new sources of light or glare were determined to not warrant a detailed evaluation in this EIR. For these reasons, the following cumulative analysis focuses on cumulative impacts related to substantial adverse effects on scenic vistas and existing visual character.

The geographic scope for evaluating cumulative impacts related to scenic vistas and visual character includes the areas surrounding the project site as well as surrounding areas with views to and from the project site. A significant cumulative aesthetic impact related to scenic vistas and visual character could occur if the addition of cumulative projects, in combination with the proposed project, substantially degrade the existing visual character or quality of public views of the site or its surroundings, thus creating adverse aesthetic effects.

The cumulative projects listed in Table 4-2 are located a minimum of 0.5-miles away from the project site, where development of these cumulative projects would not be visible within the same viewshed as the proposed project due to their distance from the project site. In addition, none of the cumulative projects listed in Table 4-2 are so large in size, height, or massing that their development would alter the visual character of the surrounding area, which could further be affected by the development of the proposed project. Similar to the proposed project, these cumulative projects would be required to be consistent with the development standards and requirements established in the City's Code of Ordinances or County's Development Code, adopted to maintain visual quality. In addition, cumulative projects requiring discretionary approval would undergo the City's planning and environmental review process, which would ensure the applicable conditions of approval and/or mitigation measures are applied to minimize visual impacts. If projects are not consistent with applicable development standards and requirements, project applicants would be required to obtain the necessary approvals and/or permits from the City to rectify such inconsistencies. For these reasons, cumulative effects related to aesthetics are considered less than significant within the cumulative study area.

As discussed in Section 3.1, "Aesthetics", while development of the project would be perceivable in the existing viewshed, the proposed project would be similar in size, height, and massing as surrounding existing structures and would not be located within the same viewshed as any of the cumulative projects listed in Table 4-2. The project would be consistent with the development standards in the City's Code of Ordinances, which regulate building heights, massing, setbacks, and other visual design features. Compliance with the City's Code of Ordinances would ensure the project's structures are sized appropriately and would not adversely change the existing visual character of the project area or mid- or long-range views of the project's viewshed, including views of the surrounding mountains. Furthermore, views of the project would be predominately limited to motorists traveling at moderate speeds along State Route (SR-) 36; therefore, the duration of views would be relatively short and similar to other gas stations along SR-35, where viewer sensitivity would be low and the existing viewshed would remain relatively similar as existing conditions. Therefore, the project's incremental contribution to the less-than-significant aesthetic cumulative effects would not be cumulatively considerable. This impact would be less than significant.

4.4.2 Air Quality

As described in Section 3.2, "Air Quality", the thresholds adopted from Appendix G related to conflicting with or obstructing implementation of the applicable air quality plan and exposure of sensitive receptors to other emissions, including odors, were determined to not warrant a detailed evaluation in this EIR. For this reason, the following cumulative analysis focuses on cumulative impacts associated with the project's potential to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard and exposure of sensitive receptors to substantial pollutant concentrations.

The geographic scope for evaluating cumulative impacts to air quality is the Northeast Plateau Air Basin (NEPAB). Potential cumulative air quality impacts would result when pollutant emissions from cumulative projects would combine to degrade air quality conditions to below acceptable levels. This could occur on a local level, such as through increases in vehicle emissions at congested intersections, or at sensitive receptor locations due to concurrent construction activities or at a regional level, such as the potential impact of multiple past, present, and probable future projects on ozone within the NEPAB. However, the NEPAB is not in non-attainment for any criteria air pollutants under both the California Ambient Air Quality Standards (CAAQS) and the National Ambient Air Quality Standards (NAAQS), meaning emissions levels are not outside acceptable ranges determined by federal and State law and enforced by the Lassen County Air Pollution Control District (LCAPCD). As such, cumulative conditions are considered to be less-than-significant within the NEPAB.

The significance thresholds adopted by the City based on Lassen County Air Pollution Control District (LCAPCD) Rule 6:4 are cumulative in nature; that is, they identify the level of project-generated emissions above which impacts would be cumulatively considerable. Thus, they represent the level at which emissions of a given project could, when considered with other projects in the NEPAB, impede the air basin from achieving ambient air quality standards, considering anticipated growth and associated emissions in that region. As such, a project determined to result in less-than-significant air quality impacts under the adopted threshold would also result in less-than-significant (i.e., less than cumulatively considerable) cumulative air quality impacts. As described in Section 3.2, "Air Quality," the project would have less than significant air quality impacts. Construction-generated emissions of criteria air pollutants and ozone precursors would not affect the nonattainment status of the NEPAB or require BACT under LCAPCD Rule 6:4. Likewise, operation-generated emissions would not conflict with air quality planning efforts, would not require BACT under LCAPCD Rule 6:4, and would not affect the attainment status of the NEPAB with respect to the CAAQS and NAAQS for these criteria pollutants. Therefore, the project's incremental contribution to the less-than-significant air quality cumulative effects would not be cumulatively considerable. This impact would be less than significant.

4.4.3 Biological Resources

As described in Section 3.3, "Biological Resources", the thresholds of significance based on the language of Section 15065 and Appendix G of the CEQA Guidelines related to substantially reducing the habitat of a fish or wildlife species; causing a fish or wildlife population to drop below self-sustaining levels; threatening to eliminate a plant or

animal community; substantially reducing the number or restricting the range of an endangered, rare, or threatened species; interfering with the movement of fish or wildlife; conflicting with local policies or ordinances protecting biological resources; and conflicting with a habitat conservation plan or natural community conservation plan were determined to not warrant a detailed evaluation in this EIR. For these reasons, the following cumulative analysis focuses on cumulative impacts to special-status species, riparian habitat or other sensitive natural community, and state or federally protected wetlands.

The geographic scope for evaluating cumulative impacts to biological resources typically encompasses the region within which similar biological resources occur, which, in this case, is Lassen County (county). Due to the size of Lassen County (4,720 square miles), a wide range of different habitats and species could be present depending on the location within the county. Cumulative projects developed within the County, including those listed in Table 4-2, have the potential to impact biological resources during ground-disturbing activities, such as grading and trenching, which could create significant cumulative impacts if similar habitats and species are affected by multiple developments. However, each cumulative project would be required to comply with legal requirements and, where applicable, those imposed by CDFW and USFWS for protection of biological resources. In addition, discretionary projects would be subject to CEQA, which would require the incorporation of project-specific mitigation measures to reduce significant impacts to biological resources to the greatest extent feasible. Nevertheless, some impacts may remain significant and unavoidable, even after mitigation. Thus, when cumulative projects are considered together, a potentially significant cumulative impact related to biological resources would occur. For this reason, cumulative effects to biological resources are considered significant within the county.

As discussed in Section 3.3 "Biological Resources," while development of the project would result in potentially significant impacts on special-status wildlife species, riparian habitat or other sensitive natural communities, and State or Federally protected wetlands, these potential impacts would be mitigated to less-than-significant levels with implementation of Mitigation Measures 3.3-2a, 3.3-2b, 3.3-2c, 3.3-3, and 3.3-4. Implementation of these mitigation measures would ensure no significant impacts would occur to onsite special-status species, riparian habitat or other sensitive natural community, and state or federally protected wetlands with development of the project. In many instances, the mitigation measures require the avoidance of any net loss of affected biological resources. In addition, the habitats of the project site are limited to sagebrush (3.59 acres), perennial grassland (10.08 acres), and fresh emergent wetland (0.48 acres). Much of the perennial grassland area is dominated by ruderal nonnative species, primarily by perennial pepperweed, a nonnative perennial herbaceous plant community, lessening the habitat's value. Therefore, with regulatory compliance and implementation of Mitigation Measures 3.3-2a, 3.3-2b, 3.3-2c, 3.3-3, and 3.3-4, the project's incremental contribution to the significant cumulative effects to biological resources would not be cumulatively considerable. This impact would be less than significant with mitigation incorporated.

4.4.4 Cultural Resources

As described in Section 3.4, "Cultural Resources", the Appendix G thresholds related to historical resources and disturbing humans remain were determined to not warrant a detailed evaluation in this EIR. For these reasons, the following cumulative analysis focuses on cumulative impacts to archaeological resources.

The geographic scope for evaluating cumulative impacts to archaeological resources typically encompasses the region within which similar archaeological resources occur, which, in this case, is Lassen County. While cumulative projects within the County are not anticipated to affect known archaeological resources, construction of cumulative projects, as discussed in Section 4.3, "Related Projects," above, have the potential to affect unknown archaeological resources during ground-disturbing activities, such as grading and trenching. Each cumulative project would be required to comply with CEQA Guidelines Section 15064.5, which requires the lead agency to determine if discovered resources qualify as unique archaeological resources or historical resources, and if so, to avoid or mitigate impacts to such resources in accordance with the provisions of Public Resources Code (PRC) Section 21083.2 and/or CEQA Guidelines section 15126.4[b]. Nevertheless, when cumulative projects are considered together, a potentially significant cumulative impact related to archaeological resources would occur as such resources are unique and are nonrenewable members of finite classes, where adverse effects erode this finite resource. The loss of any one

archaeological site or defining feature of an archaeological site could affect the scientific value of others in a geographical region because these resources are best understood in the context of the entirety of the cultural system of which they are a part. The cultural system is represented archaeologically by the total inventory of all sites and other cultural remains in the region. As a result, a meaningful approach to preserving and managing cultural resources must focus on the likely distribution of cultural resources, rather than on a single project or parcel boundary. For this reason, cumulative effects to cultural resources are considered significant within the county.

While no known unique archaeological resources or historical resources of an archaeological nature are located within the boundaries of the project site, ground-disturbing construction activities have the potential to encounter previously undiscovered or unrecorded archaeological sites and materials, which could result in damage or destruction to these resources, and/or eliminate important examples from major periods of California history or prehistory. Similar to other cumulative projects, the project would be required to comply with all applicable federal, regional, and local laws and regulations, including CEQA Guidelines Sections 15064.5 and 15126.4[b] and PRC Section 21083.2, which would reduce project impacts on archaeological resources. In accordance with CEQA Guidelines Section 15064.5, the project would be required to implement Mitigation Measures 3.4-1a and 3.4-1b, which requires construction workers to undergo worker awareness training to be informed of the procedures to follow in the event of an unanticipated discovery and requires ground-disturbing activities to be halted in the vicinity of any unanticipated discoveries until identified mitigation protocols have been implemented. Therefore, with regulatory compliance and implementation of Mitigation Measures 3.4-1a and 3.4-1b, the project's incremental contribution to the significant cumulative effects to archaeological resources would not be cumulatively considerable. This impact would be less than significant with mitigation incorporated.

4.4.5 Energy

As described in Section 3.5, "Energy", the Appendix G threshold related to conflicting with or obstruction of a state or local plan for renewable energy or energy efficiency was determined to not warrant a detailed evaluation in this EIR. For this reason, the following cumulative analysis focuses on cumulative impacts associated with the wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation of a project.

The geographic area considered for cumulative impacts related to energy use includes the Lassen Municipal Utility District (LMUD) and Plumas-Sierra Rural Electric Cooperation service areas. A cumulative energy consumption impact would occur if development of other cumulative projects, including those identified in Table 4-2, within the LMUD and Plumas-Sierra Rural Electric Cooperation service areas in conjunction with the project would result in the wasteful, inefficient, or unnecessary consumption of energy resources throughout the region.

Cumulative development would receive electricity service provided by both LMUD and Plumas-Sierra Rural Electric Cooperation, where these projects would also consume energy related to transportation and construction. Given the amount of development identified within LMUD and Plumas-Sierra Rural Electric Cooperation's service area, it is possible that implementation of cumulative projects, including those listed in Table 4-2, could result in inefficient and wasteful energy consumption. However, all cumulative projects within the LMUD and Plumas-Sierra Rural Electric Cooperation service areas would be required to comply with the applicable laws, plans, and building codes established for energy usage and efficiency, which would be enforced during the City or applicable jurisdiction's planning and development review process. In addition, these projects would be required to implement energy-efficiency measures in accordance with Title 24 to reduce energy demand. Cumulative projects requiring discretionary approval would be subject to CEQA, which would require incorporation of feasible mitigation measures to reduce any significant environmental impacts associated with wasteful, inefficient, or unnecessary consumption of energy during construction and/or operation to the greatest extent feasible. Given that cumulative development would be required to adhere to applicable laws, plans, and building codes established for energy usage and efficiency, including Title 24 standards, the cumulative effects related to wasteful, inefficient, or unnecessary consumption of energy during construction and/or operation are considered less than significant within the cumulative study area.

As discussed in Section 3.5, "Energy," the project would increase energy demand during construction; however, construction activities would be temporary and would not increase long-term, ongoing demand for energy or fuel in

a wasteful or inefficient manner. There would be no atypical construction-related energy demand associated with the development, because construction would follow standard practices related to energy consumption. Although construction companies are increasingly adopting alternative power sources like biodiesel, compressed natural gas (CNG), and electric powertrains to reduce emissions, due to the rural nature of Susanville, alternative fuels, electric vehicles and EV charging stations are not readily available, or not practical for use in construction (Los Angeles Times 2023). Certain fuel supplier companies in Susanville do have biodiesel available; however, it is undetermined whether construction vehicles that can run on biodiesel are available in the project vicinity. Regardless, nonrenewable energy would not be consumed in a wasteful, inefficient, or unnecessary manner when compared to other construction activity in the region. In addition, on-road gasoline and diesel fuel consumption associated with construction activity would decrease every year, as the vehicle fleet becomes more fuel-efficient over time.

While the project's operational energy demand would increase compare to existing conditions, the project would meet the Title 24 building efficiency standards in effect at the time of construction, which includes energy efficiency design features such as water-efficient landscape design, high-efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; EV charging station parking spaces; bicycle facilities that would meet or exceed the CALGreen or City codes (whichever is greater); Energy Star–labeled appliances, where possible; and energy-efficient and water conserving HVAC systems. The project would also include an estimated 51,000 kWh/year solar PV system that would offset some of the operational electricity use. Lastly, while the project would result in transportation energy consumption, the project is intended to service existing traffic on SR-36 and would not significantly induce new fuel consumption. Therefore, the project's incremental contribution to the less-than-significant cumulative effects related to wasteful, inefficient, or unnecessary consumption of energy resources would not be cumulatively considerable. This impact would be less than significant.

4.4.6 Geology and Soils

Impacts related to geology and soils, not including paleontological resources, would not be cumulatively considerable because the geographic context for geology and soils impacts is generally site-specific, rather than cumulative in nature. Each development site has unique geologic considerations that would be subject to uniform site development and construction standards. Therefore, the cumulative study area for geology and soils includes all areas within the project site where ground disturbing activities would occur.

As discussed in Section 3.6, "Geology and Soils," the project would be designed and constructed in accordance with the California Building Code, which accounts for geotechnical factors affecting a site and incorporates seismic safety design features. The project would not exacerbate any existing environmental hazards such as existing seismic risks. Therefore, the project, in conjunction with the cumulative projects listed in Table 4-2, would not contribute to a significant cumulative effect related to geology and soils. This impact would be less than significant.

In regard to paleontological resources, the geographic scope for the evaluation of cumulative impacts consists of Lassen County. Cumulative projects within the City and County, as discussed in Section 4.3, "Related Projects" above, have the potential to adversely affect paleontological resources or unique geologic features during ground-disturbing construction activities. Cumulative projects would be required to comply with all applicable federal, state, and local laws and regulations related to paleontological resources, including PRC Section 5097.5. In addition, potential impacts to paleontological resources or unique geologic features associated with cumulative development projects would be site-specific and would undergo individual environmental review pursuant to CEQA, which would require project-specific mitigation, as necessary. Nevertheless, when cumulative projects are considered together, a potentially significant cumulative impact related to paleontological resources would occur as such resources are unique and are nonrenewable members of finite classes, where adverse effects erode this finite resource. For this reason, cumulative effects to paleontological resources are considered significant within the County.

As discussed in Section 3.6, "Geology and Soils," the Paleontological Resource Assessment Memorandum for the Project determined the Quaternary and Pleistocene lake sediments that underlie the project site have a strong potential to preserve scientifically significant fossils and are therefore considered to have high sensitivity for paleontological resources (Appendix G). Project construction would involve excavation to a maximum depth of 10 feet

below the ground surface to install underground storage tanks, which would have potential to encounter sediments with high sensitivity for paleontological resources. However, the project would implement Mitigation Measures 3.6-1, which requires implementation of a Paleontological Resource Impact Mitigation Program to ensure the appropriate industry protocol would be implemented in the inadvertent discovery of paleontological resources. In addition, the project would comply with the applicable laws and regulations related to paleontological resources, including PRC Section 5097.5, which would further ensure impacts are minimized. Therefore, the project's incremental contribution to the significant cumulative effects related to paleontological resources or unique geologic features would not be cumulatively considerable. This impact would be less than significant with mitigation incorporated.

4.4.7 Greenhouse Gas Emissions

The discussion of greenhouse gas (GHG) emissions associated with the project and related infrastructure for Impacts 3.7-1 in Section 3.7, "Greenhouse Gas Emissions and Climate Change," is inherently a cumulative impact analysis. GHG emissions from one project cannot, on their own, result in changes in climatic conditions; therefore, the emissions from one project must be considered in the context of their contribution to cumulative global emissions, which is the basis for determining a significant cumulative impact, as noted in Section 3.7. (See *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal.4th 204, 219 ["because of the global scale of climate change, any one project's contribution is unlikely to be significant by itself"; "[t]he challenge for CEQA purposes is to determine whether the impact of the project's emissions of greenhouse gases is cumulatively considerable"].)

The analysis of Impact 3.7-1 concluded that the proposed project would result in GHG emissions during both the construction and operation of plan development implemented over the planning period. However, implementation of the project would result in construction and operational emissions below the relevant numerical threshold and would be consistent with local, regional, and statewide GHG reduction plans. Therefore, because GHG impacts are inherently cumulative, and because the project would result in less than significant impacts at the project level, the project would result in a less than cumulatively considerable contribution to GHG emissions and climate change. Therefore, the project would not contribute to a significant cumulative effect related to GHG emissions and climate change. This impact would be less than significant.

4.4.8 Noise

Noise and vibration impacts are generally experienced locally and are not cumulative or additive in nature, with the exception of noise sources that have regional effects (e.g., roadway noise, airplane noise, transportation noise). For this reason, cumulative noise and vibration conditions are considered to be less-than-significant.

Project-generated construction noise and vibration and stationary noise would be limited to the project site and nearest sensitive receptors, due to decreasing noise perception with increasing distance from the source. Increases in vehicle traffic could contribute to cumulative traffic noise along roadways in the County and City.

As discussed under Impact 3.8-1, 3.8-3, and 3.8-4, the project would not exceed applicable construction or stationary noise and vibration standards at any nearby sensitive receptor. Future development anticipated within 0.5 miles of the project include Thompson Family Trust 70 Space RV Park and Johnstonville Road Gas and Water Line Upgrades. Considering that project construction and stationary noise would not generate excessive noise beyond 445 feet, even in consideration of future anticipated development located 1,380 feet from the project site, the project's construction and operational stationary noise would not combine with noise from these anticipated development projects, and the project would not contribute to a cumulative temporary or long-term stationary noise condition. In addition, construction-related vibration would not generate excessive vibration levels that may cause human annoyance at a distance of 73 feet; the project would not combine with vibrations from other nearby development projects, and would not contribute to a cumulative excessive vibration conditions.

As discussed in Impact 3.8-2, implementation of these projects would not result in a substantial increase in ambient noise levels from traffic noise compared to existing conditions (0.0 to 1.2 dB change) and would be further diluted under cumulative conditions. Increases in traffic noise levels would be below the range at which the human ear can

detect a change (i.e. 3-dB change over existing noise levels). Therefore, the project's incremental contribution to less-than-significant cumulative conditions related to noise and vibration would not be cumulatively considerable. This impact would be less than significant.

4.4.9 Transportation

A significant cumulative impact would occur if cumulative projects, in combination with the project, would increase environmental effects on the County's circulation system by conflicting with adopted plans, policies, or ordinances established to regulate the County circulation system. Future development within the county could increase demand for transit service and facilities, bicycle facilities, and pedestrian facilities. However, each project developed within the county would be subject to County plans, policies, and ordinances that regulate the County circulation system. Therefore, cumulative effects related to conflicts with a program, plan, ordinance, or policy addressing the circulation system are not considerable. The project would include the implementation of pedestrian improvements to enhance pedestrian mobility in the vicinity of the project site, as well as the installation of bicycle racks and parking onsite. Additionally, the project would include the dedication of a 23-foot margin along the southern project site frontage to accommodate a future Class I facility extension as identified in the Regional Transportation Plan and Active Transportation Plan. Therefore, the project would be consistent with adopted plans, policies, and ordinances established to regulate the County circulation system and would not permanently affect any existing or planned bicycle, pedestrian, or transit services or facilities in the vicinity of the project site. For these reasons, implementation of the project would not result in a cumulatively considerable contribution to cumulative pedestrian, bicycle, and transit facilities impacts.

According to the Office of Land Use and Climate Innovation's (LCI's) Technical Advisory on Analyzing Transportation Impacts in CEQA, a project that falls below an efficiency-based Vehicle Miles Traveled (VMT) threshold that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project-level impact. Accordingly, a finding of a less-than-significant project-level impact would imply a less than significant cumulative impact, and vice versa (OPR 2018: 6). Thus, VMT analyses are cumulative by nature, and the significance of a potential cumulative impact is determined based on the project's individual VMT contribution to cumulative regional VMT impacts. Consequently, the project-level VMT analysis in Impact 3.9-2 in Section 3.9, "Transportation," is also a cumulative impact analysis.

As described under Impact 3.9-2, most project-generated trips are anticipated to be pass-by trips (i.e., trips already on the adjacent roadway that enter a commercial center while enroute to a different primary destination) with new employees generating a small portion of new trips. The trip length for pass-by trips diverting from SR 36 is approximately 750 feet. Because most project-generated trips are anticipated to be pass-by trips, and because the trip length for such trips is not substantial (i.e., approximately 750 feet), implementation of the project is not anticipated to generate substantial VMT from worker and visitor trips. In addition, there are other similar commercial/retail land uses (i.e., gas station, convenience market, and fast-food restaurants) in the area; thus, the project would not be a regional draw, as there are other such facilities customers could visit instead.

The recreational vehicle (RV) parking area is anticipated to serve existing trips on their way to their destination by providing customers with a temporary place to refuel and rest. The city is surrounded by recreational opportunities including Lassen Volcanic National Park approximately 67 miles northwest, but the city itself is not a major tourist destination. As detailed under Impact 3.9-2, to determine daily trips generated by the RV parking area, Fehr & Peers staff conducted counts at an overnight RV lot at a Love's Travel Stop in Brigham, Utah. Based on the counts and accounting for the number of RV parking spaces on the project site, the overnight RV parking area was anticipated to generate 40 new trips per day (Fehr & Peers 2025: 43). However, approximately 50 percent of these trips were determined to be "pass-by" trips (i.e., trips already on the adjacent roadway that enters the site enroute to a different primary destination) (Fehr & Peers 2025: 43). Therefore, the project is anticipated to generate 20 new RV trips per day. Because the parking area is anticipated to serve existing travelers already planning a trip, the RV trips are not newly generated but are rather redistributed throughout the regional roadway network depending on where overnight RV parking facilities are located. For these reasons, the project would not result in a cumulatively

considerable contribution to cumulative impacts related to VMT. Accordingly, the project's contribution to a cumulative impact related to VMT would not be cumulatively considerable.

4.4.10 Tribal Cultural Resources

The geographic scope for evaluating cumulative impacts to tribal cultural resources consists of the historic land ranges on which local Native American tribes lived traditionally within Lassen County. Cumulative impacts to tribal cultural resources could occur if any cumulative projects, in conjunction with the proposed project, would have impacts on tribal cultural resources that, when considered together, would be significant.

Cumulative projects within Lassen County, including those listed in Table 4-2, have the potential to adversely affect tribal cultural resources during ground-disturbing construction activities. Potential tribal cultural resource impacts associated with cumulative development projects would be site-specific and would undergo individual environmental and design review pursuant to CEQA in order to evaluate potential impacts. Similar to the proposed project, each cumulative project would be required to comply with the requirements of AB 52, PRC Section 21083.2(i), and CEQA Guidelines section 15126.4[b], which address accidental discoveries of archaeological sites and resources, including tribal cultural resources. As part of the AB 52 tribal consultation process, the appropriate tribal governments would be able to request to formally participate in the development review process on a project-by-project basis. In addition, the tribes would be able to recommend project-specific mitigation measures related to the protection of tribal cultural resources to be incorporated into a project. Nevertheless, ground-disturbing activities have potential to encounter previously undiscovered or unrecorded archaeological sites and materials, including Tribal cultural resources, which could result in damage or destruction to these resources. As a result, a meaningful approach to preserving and managing Tribal cultural resources must focus on the likely distribution of cultural resources, including tribal cultural resources, rather than on a single project or parcel boundary. For this reason, cumulative effects to tribal cultural resources are considered significant within the county.

As discussed in Section 3.10, "Tribal Cultural Resources," as of November 6, 2024, the Native American Heritage Commission (NAHC) indicated positive results for Native American resources within the vicinity of the study area based on a Sacred Land Files (SLF) Search conducted for the project. In accordance with AB 52 requirements, the City offered tribal consultation to seven tribes, including the Berry Creek Rancheria of Maidu Indians, Estom Yumeka Maidu Tribe of the Enterprise Rancheria, Greenville Rancheria of Maidu Indians, Honey Lake Maidu, Mooretown Rancheria of Maidu Indians, Pakan'yani Maidu of Strawberry Valley Rancheria, and Susanville Indian Rancheria. No Tribes requested consultation under AB 52 within the 30-day consultation period.

While no Tribes consulted with the City about the project, ground-disturbing activities during construction have the potential to encounter previously undiscovered or unrecorded archaeological sites and materials, including Tribal cultural resources, which could result in damage or destruction to these resources. However, the project would implement Mitigation Measures 3.10-1a and 3.10-1b, which require implementation of Mitigation Measures 3.4-1a and 3.4-1b established in Section 3.4, "Cultural Resources". Implementation of Mitigation Measures 3.4-1a and 3.4-1b in combination with compliance with existing regulations (California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097) would prevent the project from causing a significant impact on tribal cultural resources, including Native American human remains. Because this potentially significant impact would be avoided with implementation of mitigation, the project's contribution to the existing cumulative impact on Tribal cultural resources including human remains in the area would not be cumulatively considerable. Therefore, the project's contribution to the significant cumulative conditions for tribal cultural resources would not be cumulatively considerable. This impact would be less than significant with mitigation incorporated.

4.4.11 Utilities and Service Systems

As described in Section 3.11, "Utilities and Service Systems," the Appendix G thresholds related to sufficient water supplies, adequate wastewater treatment capacity; solid waste generation; and compliance with solid waste regulations remain were determined to not warrant a detailed evaluation in this EIR. For these reasons, the following cumulative analysis focuses on cumulative impacts related to the need for expanded utility facilities or services.

The geographic context for evaluating cumulative impacts related to the need for expanded utility facilities or services consist of the applicable service areas of City of Susanville, Susanville Consolidated Sanitary District (District), and Lassen Municipal Utility District. A significant cumulative impact related to increase the demand for new and expanded utility infrastructure could occur if cumulative development projects, in combination with the project, would increase demand on existing utilities and their facilities to the point where additional capacity and/or facilities would need to be constructed to continue to adequately serve their service areas.

Development of cumulative projects within the applicable service areas of City of Susanville, Susanville Consolidated Sanitary District (District), and Lassen Municipal Utility District (LMUD) would increase the demand for new and expanded utility infrastructure, the relocation or construction of which could cause significant environmental effects. However, as stated in Section 3.15, the City, District and LMUD have adequate capacity to accommodate projected future demand with their existing facilities and infrastructure. Each project developed within the respective service areas would be required to undergo planning and design review, where the City would ensure adequate utility capacity is available to serve the project as well as that the project would be able to connect to the existing utility systems. In addition, cumulative development would be required to contribute fair share funding as part of their planning application to aid the utility service providers in maintaining their facilities and infrastructure as well as and conduct appropriate CEQA analyses to evaluate potential environmental impacts of utility relocation, construction, or expansion. Through payment of fair share contributions, utility providers would be able to increase utility capacity as future development occurs within their service areas. For these reasons, the cumulative effects related to increased demand for new and expanded utility infrastructure are considered less than significant within the cumulative study area.

As described in Section 3.11, "Utilities and Service Systems", the project's utility demand could be accommodated by the service providers in combination with the providers' existing and reasonably foreseeable commitments and as such, would not require the development of new or expanded utility facilities and/or infrastructure. Furthermore, the cumulative effects associated with the construction of the utility connections (i.e., connections to existing water, wastewater, gas, and electricity utility facilities and infrastructure) necessary to serve the project site are evaluated and disclosed in Sections 4.4.1 to 4.4.11 of this EIR. The project would also comply with all applicable federal, state, and local laws related to utilities and service systems, which would further minimize impacts to existing utility providers and their associated facilities and infrastructure. Therefore, the project's contribution to the less-than-significant cumulative conditions for utility and service systems would not be cumulatively considerable. This impact would be less than significant.

5 ALTERNATIVES

5.1 INTRODUCTION

The California Code of Regulations (CCR) Section 15126.6(a) (State CEQA Guidelines) requires EIRs to describe "… a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather, it must consider a range of potentially feasible alternatives that will avoid or substantially lessen the significant adverse impacts of a project and foster informed decision making and public participation. An EIR is not required to consider alternatives that are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason." This section of the State CEQA Guidelines also provides guidance regarding what the alternatives analysis should consider. Subsection (b) further states the purpose of the alternatives analysis is as follows:

> Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code [PRC] Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

The State CEQA Guidelines require that the EIR include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative must be discussed, but in less detail than the significant effects of the project as proposed (CCR Section 15126.6[d]).

The State CEQA Guidelines further require that the "no project" alternative be considered (CCR Section 15126.6[e]). The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving the proposed project. If the no project alternative is the environmentally superior alternative, CEQA requires that the EIR "…shall also identify an environmentally superior alternative among the other alternatives." (CCR Section 15126[e][2]).

In defining "feasibility" (e.g., "… feasibly attain most of the basic objectives of the project …"), CCR Section 15126.6(f) (1) states, in part:

> Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.

In determining what alternatives should be considered in the EIR, it is important to consider the objectives of the project, the project's significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted above, EIRs must contain a discussion of "potentially feasible" alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by the lead agency's decision-making body, here the City of Susanville. (See PRC Sections 21081.5, 21081[a] [3].)

5.2 CONSIDERATIONS FOR SELECTION OF ALTERNATIVES

5.2.1 Attainment of Project Objectives

Consistent with CEQA Guidelines Section 15124(b), a clear statement of the objectives and underlying purpose of the project shall be disclosed in the Draft EIR. The underlying purpose of the project is to develop a regional travel stop and related commercial land uses along a designated Surface Transportation Assistance Act (STAA) route in Lassen County. This underlying purpose, in turn, gives rise to the following project objectives:

- Create a high-quality travel stop commercial development along SR 36, a designated Surface Transportation Assistance Act (STAA) route.[1]
- Develop a property of sufficient size to create a regional travel stop that would accommodate a truck and auto fuel dispensing area, convenience store, two fast-food restaurants, dog park, truck parking and overnight RV parking.
- Construct a travel stop facility near a major highway to minimize truck and automobile movements, Vehicle Miles Traveled (VMT), and associated air pollutant and greenhouse gas emissions and traffic noise on local streets.
- Assist the City of Susanville with meeting its economic development goals, as set forth in its General Plan.
- Maximize tax revenue to the City of Susanville.
- Provide employment opportunities for residents of the City of Susanville and surrounding areas.
- Construct a facility with proximal access to adequate existing or anticipated utility infrastructure to support planned operations.
- Provide a travel stop facility of sufficient size to capture overflow overnight truck parking.

Feasible alternatives must meet most but not all of the primary project objectives.

5.2.2 Environmental Impacts of the Susanville Travel Stop Project

Sections 3.1 through 3.11 of this Draft EIR address the environmental impacts of implementation of the proposed Love's Travel Stop project. Potentially feasible alternatives were developed with consideration of avoiding or lessening the potentially significant, adverse impacts of the project, as identified in Chapter 3 of this Draft EIR and summarized below. If an environmental issue area analyzed in this Draft EIR is not addressed below, it is because no impacts were identified for that issue area. As discussed below, no significant and unavoidable environmental impacts resulting from the project were identified. This Draft EIR did identify some environmental impacts that, absent mitigation, would be significant. With mitigation, however, these impacts could be rendered less than significant. Some of these same significant but mitigable impacts could also be reduced in severity by project alternatives. As the California Supreme Court has explained, "alternatives and mitigation measures have the same function—diminishing or avoiding adverse environmental effects." (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 403.) The significant but mitigable impacts are described immediately below.

- Aesthetics:
  - Impact 3.1-1: Have a substantial adverse effect on a scenic vista. *Less than significant.*
  - Impact 3.1-2: Substantially degrade the existing visual character or quality of the site on its surroundings. *Less than significant.*
- Air Quality:
  - Impact 3.2-1: Construction Emissions of Criteria Air Pollutants and Ozone Precursors. *Less than significant.*

[1] STAA routes are those that trucks that are longer than 'CA legal' are allowed to travel on.

- Impact 3.2-2: Operational Emissions of Criteria Air Pollutants and Ozone Precursors. *Less than significant.*
- Impact 3.2-3: Expose Sensitive Receptors to Substantial Pollutant Concentrations. *Less than significant.*

- Biological Resources:
  - Impact 3.2-1: Have a Substantial Adverse Effect on Special-Status Plant Species. *Less than significant.*
  - Impact 3.2-2: Have a Substantial Adverse Effect on Special-Status Wildlife Species, Native Raptors, and Other Native Nesting Birds. *Less than significant with Mitigation.*
  - Impact 3.2-3: Have a Substantial Adverse Effect on Riparian Habitat or Other Sensitive Natural Communities. *Less than significant with Mitigation.*
  - Impact 3.2-4: Have a Substantial Adverse Effect on State or Federally Protected Wetlands. *Less than significant with Mitigation.*
- Cultural Resources:
  - Impact 3.4-1: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources or any Historical Resources of an Archaeological Nature. *Less than significant with Mitigation.*
- Energy:
  - Impact 3.5-1: Wasteful, Inefficient, or Unnecessary Consumption of Energy, During Project Construction or Operation. *Less than significant.*
- Geology and Soils:
  - Impact 3.6-1: Destroy a unique paleontological resource or site or unique geologic feature. *Less than significant with Mitigation.*
- Greenhouse Gas Emissions and Climate Change:
  - Impact 3.7-1: Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. *Less than significant.*
- Noise and Vibration:
  - Impact 3.8-1: Generate a Substantial Increase in Short-Term Construction Noise. *Less than significant.*
  - Impact 3.8-2: Generate a Substantial Increase in Off-Site Transportation Noise. *Less than significant.*
  - Impact 3.8-3: Generate a Substantial Increase in Long-Term Stationary Operational Noise. *Less than significant.*
  - Impact 3.8-4: Generate a Substantial Increase in Short-Term Construction Vibration. *Less than significant.*
- Transportation/Traffic:
  - Impact 3.9-1: Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. *Less than significant*
  - Impact 3.9-2: Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). *Less than significant.*
- Tribal Cultural Resources:
  - Impact 3.10-1: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource. *Less than significant with Mitigation.*
- Utilities and Service Systems:
  - Impact 3.15-1: Significant Environmental Effects from the Relocation or Construction of New or Expanded Utility Infrastructure. *Less than significant.*

5.3 ALTERNATIVES CONSIDERED BUT NOT EVALUATED FURTHER

As described above, State CEQA Guidelines Section 15126.6(c) provides that the range of potential alternatives for the project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. Alternatives that fail to meet the fundamental project purpose need not be addressed in detail in an EIR. (*In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings* (2008) 43 Cal.4th 1143, 1165-1167.)

In determining what alternatives should be considered in the EIR, it is important to acknowledge the objectives of the project, the project's significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted above, EIRs must contain a discussion of "potentially feasible" alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by lead agency decision-maker(s). (See Pub. Resources Code, § 21081(a)(3).) At the time of action on the project, the decision-maker(s) may consider evidence beyond that found in this EIR in addressing such determinations. The decision-maker(s), for example, may conclude that a particular alternative is infeasible (i.e., undesirable) from a policy standpoint, and may reject an alternative on that basis provided that the decision-maker(s) adopts a finding, supported by substantial evidence, to that effect, and provided that such a finding reflects a reasonable balancing of the relevant economic, environmental, social, and other considerations supported by substantial evidence. (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 417; *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 998.)

The EIR should also identify any alternatives that were considered by the lead agency but were rejected during the planning or scoping process and briefly explain the reasons underlying the lead agency's determination.

The following alternative was considered by the City of Susanville but was rejected and is not evaluated further in this Draft EIR.

5.3.1 No Short-Term or Overnight Truck Parking

Short-term and overnight truck parking is one of the primary objectives of the proposed project and is integral to successful operation of the proposed project. The project proposes 70 overnight truck parking spaces that will be utilized for short term or overnight truck parking. The ability to safely park trucks on the project site is directly related to the successful operation of the other onsite facilities including truck fueling, the convenience store, and the fast-food restaurants. In many cases, not having onsite truck parking would encourage truck drivers to continue to other truck support facilities, bypassing the proposed project. The alternative was not further evaluated in the EIR due to it not meeting one or more of the basic objectives of the proposed project.

5.3.2 Potential Alternative Location

CEQA sometimes requires that a legally adequate range of alternatives include an alternative location, but such alternatives are not always required. The facts surrounding particular projects should be considered in determining whether to include offsite alternatives. Relevant factors to consider are set forth in State CEQA Guidelines Section 15126.6(f)(2):

(A) Key question. The key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.

(B) None feasible. If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR. For example, in some cases there may be no feasible alternative locations for a geothermal plant or mining project which must be in close proximity to natural resources at a given location.

(C) Limited new analysis required. Where a previous document has sufficiently analyzed a range of reasonable alternative locations and environmental impacts for projects with the same basic purpose, the lead agency should review the previous document. The EIR may rely on the previous document to help it assess the feasibility of potential project alternatives to the extent the circumstances remain substantially the same as they relate to the alternative. (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 573).

Section 15126.6(f) further explains, more generally that, "[a]mong the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives. (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553; see *Save Our Residential Environment v. City of West Hollywood* (1992) 9 Cal.App.4th 1745, 1753, fn. 1)."

In the *Citizens of Goleta Valley* decision, twice mentioned in section 15126.6, the California Supreme Court focused on the factor of whether, for a private project, the proponent can reasonably acquire, control or otherwise have access to an alternative site where development could occur with fewer or diminished significant environmental impacts:

> Finally, [Appellant] argues that the Board improperly considered that Hyatt did not own any of the alternative sites, and that one of the sites, Carpinteria Bluffs, lay outside of the County's jurisdiction. We disagree. As earlier noted, a project alternative which cannot be feasibly accomplished need not be extensively considered. A feasible alternative is one which can be "accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." (Pub. Resources Code, § 21061.1; Guidelines, § 15364.) Surely whether a property is owned or can reasonably be acquired by the project proponent has a strong bearing on the likelihood of a project's ultimate cost and the chances for an expeditious and "successful accomplishment."
>
> This is not to suggest that private projects are categorically exempt from alternative-site review. Understandably, the government's power of eminent domain and access to public lands suggest that alternative sites may be more feasible, more often, when the developer is a public rather than a private agency. [Case Citations.]
>
> Nevertheless, there may be cases involving proposed development by a private entity in which the consideration of alternative sites is necessary and proper. The private developer may own or control feasible alternative sites, may have the ability to purchase or lease such properties, or may otherwise have access to suitable alternatives. [Case Citations.] Other circumstances may necessitate review of alternative properties, as well.
>
> (52 Cal.3d at pp. 574-575.)

Here, there are no feasible alternative locations that would meet most of the basic project objectives and substantially lessen or avoid any of the project's environmental impacts. Notably, the project applicant does not own or control any other sites within Lassen County along an STAA route that are suitable for development of a travel stop. Nor are there any other suitable sites within the City's sphere of influence. Accordingly, this alternative is not further analyzed in this Draft EIR.

5.4 ALTERNATIVES SELECTED FOR DETAILED ANALYSIS

The following alternatives were evaluated in this Draft EIR.

- Alternative 1: No Project–No Development Alternative assumes no construction of the travel stop. The project site would remain in its current condition.
- Alternative 2: No Drive-Thru Fast-Food Restaurant Alternative assumes that the proposed drive-thru fast-food restaurant will not have a drive-thru component and only be walk-in.

- **Alternative 3: No Overnight Recreational Vehicle (RV) Parking Alternative** assumes that the proposed overnight RV parking would not be included as part of the proposed project.

Further details on these alternatives, and an evaluation of environmental effects relative to the proposed project, are provided below.

5.4.1 Alternative 1: No Project–No Development Alternative

Under Alternative 1, the No Project–No Development Alternative, no actions would be taken by the City of Susanville and the project site would remain unchanged from current conditions. The project site would remain vacant and in its current condition. The No Project – No Development Alternative would not meet the project objectives. However, as required by CEQA, the No Project – No Development Alternative is evaluated in this Draft EIR.

Although it is acknowledged that with the No Project–No Development Alternative, there would be no discretionary action by the city or Lassen County LAFCO, and thus no impact, for purposes of comparison with the other action alternatives, conclusions for each technical area are characterized as "impacts" that are greater, similar, or less, to describe conditions that are worse than, similar to, or better than those of the proposed project.

AESTHETICS

Implementation of the No Project-No Development Alternative would not result in any impacts to Aesthetics. The project site would remain in its current undeveloped condition. There would be **no impact** and impacts would be less than the proposed project.

AIR QUALITY AND GREENHOUSE GAS EMISSIONS

Implementation of the No Project-No Development Alternative would not result in any impacts to Air Quality and Greenhouse Gas Emissions. The project site would remain in its current undeveloped condition. There would be **no impact** and impacts would be less than the proposed project.

BIOLOGICAL RESOURCES

Implementation of the No Project-No Development Alternative would not result in any impacts to Biological Resources. The project site would remain in its current undeveloped condition. There would be no impact. Impacts would be less than the proposed project.

CULTURAL RESOURCES AND TRIBAL CULTURAL RESOURCES

Implementation of the No Project-No Development Alternative would not result in any impacts to Archaeological, Historical, and Tribal Cultural Resources. The project site would remain in its current undeveloped condition. There would be **no impact** and impacts would be less than the proposed project.

ENERGY

Implementation of the No Project-No Development Alternative would not result in any impacts to Energy. The project site would remain in its current undeveloped condition. There would be **no impact** and impacts would be less than the proposed project.

GEOLOGY AND SOILS

Implementation of the No Project-No Development Alternative would not result in any impacts to Geology and Soils. The project site would remain in its current undeveloped condition. There would be **no impact** and impacts would be less than the proposed project.

NOISE AND VIBRATION

Implementation of the No Project-No Development Alternative would not result in any impacts to Noise and Vibration. The project site would remain in its current undeveloped condition. There would be **no impact** and impacts would be less than the proposed project.

TRANSPORTATION/TRAFFIC

Implementation of the No Project-No Development Alternative would not result in any impacts to Transportation and Traffic. The project site would remain in its current undeveloped condition. There would be **no impact** and impacts would be less than the proposed project.

UTILITIES AND SERVICE SYSTEMS

Implementation of the No Project-No Development Alternative would not result in any impacts to Utilities and Service Systems. The project site would remain in its current undeveloped condition. There would be **no impact** and impacts would be less than the proposed project.

5.4.2 Alternative 2: No Drive-Thru Fast-Food Restaurant Alternative

The project proposes two fast-food restaurants, one of which contains a drive-thru component. Alternative 2 would eliminate the drive-thru component of the fast-food restaurant and operate only as a walk-in fast-food restaurant, with the drive-thru lanes occupied by additional parking stalls. Elimination of the drive-thru component of the proposed fast-food restaurant would reduce potential air quality and greenhouse gas emissions associated with vehicle idling and increase the demand for restaurant-related parking.

Alternative 2 would meet most of the objectives of the proposed project because it would create a commercial development with facilities and amenities for travelers along a major transportation corridor. Alternative 2 would contribute to the City's economic development and increase tax revenue and employment opportunities in the City; however, the economic merits and available services of Alternative 2 would be slightly reduced in comparison to the proposed project because the fast-food drive-thru component would not be constructed, and thus would likely lead to less visitors due to the minor inconvenience of not having the drive-thru. Therefore, Alternative 2 would meet the project objectives to a lesser extent than the proposed project.

Alternative 2 would occupy a similar area to the proposed project and would be developed at the same project location. Alternative 2 would be similar to the proposed project with respect to site suitability, availability of infrastructure, and general plan consistency; therefore, the same factors that would affect the physical feasibility of the proposed project would apply to Alternative 2.

The following sections provide a discussion of the environmental effects of Alternative 2 relative to the proposed project for each environmental issue area. Table 5-1 in Section 5.4, "Environmentally Superior Alternative," summarizes the impacts identified for the proposed project and those identified for Alternative 2. Conclusions for each technical area are characterized as "impacts" that are greater, similar, or less, to describe conditions that are worse than, similar to, or better than those of the proposed project.

AESTHETICS

Implementation of Alternative 2 would not result in a substantial change to the project design and would not result in a reduction in impacts to aesthetics as the dominant features associated with the proposed project, such as canopies over the fueling areas, convenience store and high-rise sign would remain. Thus, there would be no substantial visual difference between this alternative and the proposed project. Similar to the project, Alternative 2 would be required to comply with the City's planning and design requirements, including outdoor lighting requirements, which would ensure compatibility with applicable zoning and other regulations governing scenic quality as well as with existing regulations related to light and glare. The aesthetic impacts associated with Alternative 2 would remain similar to the proposed project impacts. Therefore, aesthetic impacts would be **less than significant** under Alternative 2, similar to what was analyzed under the proposed project.

AIR QUALITY AND GREENHOUSE GAS EMISSIONS

Implementation of Alternative 2 would result in an incremental reduction in air quality and greenhouse gas emissions associated with drive-thru vehicle idling while waiting for completion of orders. Construction-related emissions would be similar under Alternative 2 relative to the proposed project. In addition, without the inclusion of the drive-thru, there would be fewer vehicle trips, resulting in a decrease in VMT. The reduction in air quality and greenhouse gas emissions would not be substantial in comparison to the overall proposed project. Therefore, air quality and greenhouse gas impacts would be **less than significant** under Alternative 2, incrementally less than what was analyzed under the proposed project.

BIOLOGICAL RESOURCES

Implementation of Alternative 2 would not result in a substantial change to the project design and would not result in a reduction in impacts to biological resources, as the area for the drive-thru lanes would be replaced with a larger parking area. Alternative 2 would have potential to affect the same special-status plant and wildlife species as described in Section 3.3, "Biological Resources". Therefore, biological resources impacts would be **less than significant with mitigation** under Alternative 2, similar to what was analyzed under the proposed project.

CULTURAL RESOURCES AND TRIBAL CULTURAL RESOURCES

Implementation of Alternative 2 would not result in a substantial change to the project design and would not result in a reduction in impacts to archaeological, historical and tribal cultural resources as the area for the drive-thru lanes would be replaced by parking and would still be subject to grading and paving. The archaeological, historical and tribal cultural resources impacts associated with Alternative 2 would remain similar to the proposed project impacts. Implementation of Mitigation Measures 3.4-1a and 3.4-1b would still be required to reduce the level of impact to a less than significant level. Alternative 2 would result in similar types of archaeological, historical, and tribal cultural resources impacts that would result from the proposed project. Therefore, archaeological, historical and tribal cultural resources impacts would be **less than significant with mitigation** under Alternative 2, similar to what was analyzed under the proposed project.

ENERGY

Implementation of Alternative 2 would not result in a substantial change to the project design and would not result in a significant reduction in impacts to energy as the area for the drive-thru lanes would be replaced by parking stalls. There would be an incremental reduction in energy use associated with drive-thru vehicle idling while waiting for completion of orders. In addition, without the inclusion of the drive-thru, there would be fewer vehicle trips and visitors to the project site under Alternative 2, resulting in a decrease in VMT compared to the proposed project. The energy impacts associated with Alternative 2 would be **less than significant** under Alternative 2, incrementally less than what was analyzed under the proposed project.

GEOLOGY AND SOILS

Alternative 2 would be subject to the same Construction General National Pollutant Discharge Elimination System (NPDES) Permit conditions that would apply to the proposed project. The excavation and grading needed to install the additional parking area would be to a similar depth as the drive-thru lanes, thus there would still be a potential to impact unknown paleontological resources. The paleontological resource impacts associated with Alternative 2 would remain similar to the proposed project impacts. Implementation of Mitigation Measure 3.7-1 would still be required to reduce the level of impact to paleontological resource to a less than significant level. Alternative 2 would result in similar types of impacts to paleontological resources as the proposed project. Implementation of Alternative 2 would not result in a substantial change to the project design and would not result in a reduction in impacts to geology and soils. The geology and soils impacts associated with Alternative 2 would remain similar to the proposed project impacts. Therefore, geology and soils impacts would be **less than significant with mitigation** under Alternative 2, similar to what was analyzed under the proposed project.

NOISE AND VIBRATION

Implementation of Alternative 2 would not result in a substantial change to the project design and would not result in a significant reduction in impacts to noise and vibration as the area for the drive-thru lanes would be replaced by parking stalls. There would be an incremental reduction in noise associated with drive-thru vehicle idling while waiting for completion of orders, and also no noise would be generated by the speaker/communications system while placing an order. In addition, without the inclusion of the drive-thru, there would be fewer vehicle trips, potentially resulting in a decrease in vehicular traffic, and thus a decrease in noise. Therefore noise and vibration impacts would be **less than significant** under Alternative 2, incrementally less than what was analyzed under the proposed project.

TRANSPORTATION/TRAFFIC

Under Alternative 2 without the inclusion of the drive-thru, there would be fewer vehicle trips, resulting in a decrease in VMT compared to the proposed project. Alternative 2 would result in similar types of transportation and circulation impacts that would result from the proposed project. Implementation of Alternative 2 would not result in a substantial change to the project design and would not result in a significant reduction in impacts to transportation/traffic. Therefore, transportation/traffic impacts would be **less than significant** under Alternative 2, incrementally less than what was analyzed under the proposed project.

UTILITIES AND SERVICE SYSTEMS

Like the proposed project, Alternative 2 would require the construction of new and extended utility infrastructure, such as sewer, domestic water, natural gas and electrical power. New and expanded utility infrastructure required to serve Alternative 2 would be installed within the project site and within the same rights-of-way as the proposed project. Implementation of Alternative 2 would not result in a substantial change to the project design and would not result in a reduction in impacts to utilities and service system. Therefore, utilities and service systems impacts would be **less than significant**, under Alternative 2 and would remain similar to the proposed project impacts.

5.4.3 Alternative 3: No Overnight RV Parking Alternative

Alternative 3 would include all of the elements evaluated under the proposed project as described in Section 2, "Project Description," except Alternative 3 would eliminate the overnight RV parking component of the proposed project. The project proposes ten (10) RV overnight parking spaces in the northern portion of the site that range in width from 12 to 20 feet. Power and water/wastewater hookups would be provided. Overnight RV parking users are expected to stay one day before continuing on their trip. Similar to the proposed project, construction of the offsite utilities would be needed under Alternative 3 to supply water, and sewer facilities to the travel stop.

Under Alternative 3, the overnight RV parking footprint that would be developed under the proposed project, would be replaced by a larger bioretention basin.

Alternative 3 would meet most of the objectives of the proposed project because it would create a commercial development with facilities and amenities for travelers along a major transportation corridor. Alternative 3 would contribute to the City's economic development and increase tax revenue and employment opportunities in the City; however, the economic merits and available services of Alternative 3 would be slightly reduced in comparison to the proposed project because the overnight RV parking area would not be constructed. Therefore, Alternative 3 would meet the project objectives to a lesser extent than the proposed project.

Alternative 3 would occupy a similar area to the proposed project and would be developed at the same project location. Alternative 3 would be similar to the proposed project with respect to site suitability, availability of infrastructure, and general plan consistency; therefore, the same factors that would affect the physical feasibility of the proposed project would apply to Alternative 3.

The following sections provide a discussion of the environmental effects of Alternative 3 relative to the proposed project for each environmental issue area. Table 5-1 in Section 5.4, "Environmentally Superior Alternative," summarizes the impacts identified for the proposed project and those identified for Alternative 3. Conclusions for each technical area are characterized as "impacts" that are greater, similar, or less, to describe conditions that are worse than, similar to, or better than those of the proposed project.

AESTHETICS

Aesthetic conditions at the project site would chiefly remain the same as the proposed project under this alternative because Alternative 3 would develop the project site in the same manner as the proposed project but would eliminate the proposed 10 RV spaces. Implementation of Alternative 3 would not result in a substantial change to the project design as the dominant features associated with the proposed project, such as canopies over the fueling areas, convenience store and high-rise sign would remain. Thus, there would be no substantial visual difference between this alternative and the proposed project. Similar to the project, Alternative 3 would be required to comply with the City's planning and design requirements, including outdoor lighting requirements, which would ensure compatibility with applicable zoning and other regulations governing scenic quality as well as with existing regulations related to light and glare. The aesthetic impacts associated with Alternative 3 would remain similar to the proposed project impacts. Therefore, aesthetic impacts would be **less than significant** under Alternative 3, similar to what was analyzed under the proposed project.

AIR QUALITY AND GREENHOUSE GAS EMISSIONS

Implementation of Alternative 3 would result in an incremental reduction in air quality and GHG emissions associated with RV idling while parking and levelling. Also, because the project site would have a marginally smaller footprint, there would be marginally less equipment and activity needed to complete construction of the larger bioretention basin than the overnight RV parking pads. Thus, construction-related emissions would be marginally less under Alternative 3 relative to the proposed project. In addition, without the inclusion of the overnight RV parking area, there would be fewer vehicle trips, resulting in a decrease in VMT than assumed for the proposed project. A reduction in the number of trips, VMT, and natural gas consumed would decrease emissions. Distances to existing receptors would be the same for Alternative 3 as for the proposed project. Thus, long-term operational air quality emissions would be marginally less under Alternative 3 compared to the proposed project. The reduction in air quality and greenhouse gas emissions would not be substantial in comparison to the overall proposed project. Therefore, air quality and GHG impacts would be **less than significant** under Alternative 3, similar to what was analyzed under the proposed project.

BIOLOGICAL RESOURCES

Implementation of Alternative 3 would not result in a substantial change to the project design and would not result in a reduction in impacts to biological resources, as the area for overnight RV parking would be replaced with a larger bioretention basin. Alternative 3 would have potential to affect the same special-status plant and wildlife species as described in Section 3.3, "Biological Resources" except the probability of these species being found is marginally reduced because the paved area footprint would be smaller and the bioretention basin would offer a more-valuable habitat. Therefore, biological resources impacts would be **less than significant with mitigation** under Alternative 3, similar to what was analyzed under the proposed project.

CULTURAL RESOURCES AND TRIBAL CULTURAL RESOURCES

Implementation of Alternative 3 would not result in a substantial change to the project design and would not result in a reduction in impacts to archaeological, historical and tribal cultural resources. The excavation needed to install the overnight RV parking pads would be to a similar depth as the larger bioretention basin. Specifically, no impacts would occur to historical resources, but there would still be a potential to impact unknown archaeological resources, particularly unknown significant prehistoric resources which may also be considered Tribal Cultural Resources. The archaeological, historical and tribal cultural resources impacts associated with Alternative 3 would remain similar to the proposed project impacts. Implementation of Mitigation Measures 3.4-1a and 3.4-1b would still be required to reduce the level of impact to a less than significant level. Alternative 3 would result in similar types of archaeological, historical, and tribal cultural resources impacts that would result from the proposed project. Therefore, archaeological, historical and tribal cultural resources impacts would be **less than significant with mitigation** under Alternative 3, similar to what was analyzed under the proposed project.

ENERGY

Implementation of Alternative 3 would not result in a substantial change to the project design and would not result in a substantial reduction in impacts to energy. Because the project site would have a marginally smaller footprint, there would be marginally less equipment and activity needed to complete construction of the larger bioretention basin than the overnight RV parking pads. Thus, construction-related energy use would be marginally less under Alternative 3 relative to the proposed project. In addition, without the inclusion of the overnight RV parking area, there would be fewer vehicle trips, resulting in a decrease in VMT than assumed for the proposed project. A reduction in the number of trips, VMT, and natural gas consumed would decrease energy usage, especially as RVs using the site would likely "hook up" to the RV power outlets and thus consume energy. Therefore, energy impacts would be **less than significant** under Alternative 3, similar to what was analyzed under the proposed project.

GEOLOGY AND SOILS

Alternative 3 would be subject to the same Construction General National Pollutant Discharge Elimination System (NPDES) Permit conditions that would apply to the proposed project. The excavation needed to install the overnight RV parking pads would be to a similar depth as the larger bioretention basin, thus there would still be a potential to impact unknown paleontological resources. The paleontological resource impacts associated with Alternative 3 would remain similar to the proposed project impacts. Implementation of Mitigation Measure 3.7-1 would still be required to reduce the level of impact to paleontological resource to a less than significant level. Alternative 3 would result in similar types of impacts to paleontological resources as the proposed project. Implementation of Alternative 3 would not result in a substantial change to the project design and would not result in a reduction in impacts to geology and soils. The geology and soils impacts associated with Alternative 3 would remain similar to the proposed project impacts. Therefore, geology and soils impacts would be **less than significant with mitigation** under Alternative 3, similar to what was analyzed under the proposed project.

NOISE AND VIBRATION

Without the inclusion of overnight RV parking, there would be less trips to the project site under Alternative 3. A reduction in the number of trips would decrease traffic noise exposure on existing sensitive receptors and intermittent single-event noise levels. In addition, there would be fewer visitors accessing the site with RVs because overnight accommodations for travelers would not be available. Thus, long-term operational non-transportation noise levels would be less under Alternative 3 compared to the project. In summary, Alternative 3 would result in similar types of noise and vibration impacts that would result from the proposed project. Implementation of Alternative 3 would not result in a substantial change to the project design and would not result in a significant reduction in impacts to noise and vibration. Therefore, noise and vibration impacts would be **less than significant** under Alternative 3, similar to what was analyzed under the proposed project.

TRANSPORTATION/TRAFFIC

Under Alternative 3 without the inclusion of the RV parking, there would be fewer RV trips, resulting in a marginal decrease in VMT compared to the proposed project. Alternative 3 would result in similar types of transportation and circulation impacts that would result from the proposed project. Implementation of Alternative 3 would not result in a substantial change to the project design and would not result in a significant reduction in impacts to transportation/traffic. Therefore, transportation/traffic impacts would be **less than significant** under Alternative 3, incrementally less than what was analyzed under the proposed project.

UTILITIES AND SERVICE SYSTEMS

Like the proposed project, Alternative 3 would require the construction of new and extended utility infrastructure, such as sewer, domestic water, natural gas and electrical power. New and expanded utility infrastructure required to serve Alternative 3 would be installed within the project site and within the same rights-of-way as the proposed project. Implementation of Alternative 3 would not result in a substantial change to the project design, but would result in an incremental reduction in impacts to utilities and service system as there would no need for sewer, water and power hookups for overnight RVs. Therefore, utilities and service systems impacts would be **less than significant**, under Alternative 3 and would remain similar to the proposed project impacts.

5.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Because the No Project–No Development Alternative (described above in Section 5.4.1) would avoid all adverse impacts resulting from construction and operation of the Proposed Project analyzed in Chapter 3, it is the environmentally superior alternative. However, the No Project–No Development Alternative would not meet the objectives the project as presented above in Section 5.2.

When the environmentally superior alternative is the No Project Alternative, the State CEQA Guidelines (Section 15126[d][2]) require selection of an environmentally superior alternative from among the other action alternatives evaluated. As illustrated in Table 5-1, below, the No Fast-Food Drive-Thru Alternative would be environmentally superior action alternative because although the environmental impacts would be similar to the proposed project and Alternative 3, the reduced degree of fast-food drive-thru traffic would incrementally reduce the emissions of criteria air pollutants, GHGs, noise and VMT generated by the proposed project drive-thru. The incremental decrease in air quality, GHG, noise and transportation impacts is a greater incremental decrease than the reductions associated with Alternative 3.

Table 5-1 Summary of Environmental Effects of the Alternatives Relative to the Proposed Project

Environmental Topic	Proposed Project	Alternative 1: No Project – No Development Alternative	Alternative 2: No Fast-Food Restaurant Drive-Thru Alternative	Alternative 3: No Overnight RV Parking Alternative
Aesthetics				
Impact 3.1-1: Have a substantial adverse effect on a scenic vista	LTS	NI	LTS	LTS
Impact 3.1-2: In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	LTS	NI	LTS	LTS
Air Quality and Greenhouse Gas Emissions				
Impact 3.2-1: Construction Emissions of Criteria Air Pollutants and Ozone Precursors	LTS	NI	LTS	LTS
Impact 3.2-2: Operational Emissions of Criteria Air Pollutants and Ozone Precursors	LTS	NI	LTS	LTS
Impact 3.2-3: Expose Sensitive Receptors to Substantial Pollutant Concentrations	LTS	NI	LTS	LTS
Biological Resources				
Impact 3.3-1: Have a Substantial Adverse Effect on Special-Status Plant Species	LTS	NI	LTS	LTS
Impact 3.3-2: Have a Substantial Adverse Effect on Special-Status Wildlife Species, Native Raptors, and Other Native Nesting Birds	LTS MM	NI	LTS MM	LTS MM
Impact 3.3-3: Have a Substantial Adverse Effect on Riparian Habitat or Other Sensitive Natural Communities	LTS MM	NI	LTS MM	LTS MM
Impact 3.3-4: Have a Substantial Adverse Effect on State or Federally Protected Wetlands	LTS MM	NI	LTS MM	LTS MM
Cultural Resources and Tribal Cultural Resources				
Impact 3.4-1: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources Impact 3.10-1: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource	LTS MM	NI	LTS MM	LTS MM

Environmental Topic	Proposed Project	Alternative 1: No Project – No Development Alternative	Alternative 2: No Fast-Food Restaurant Drive-Thru Alternative	Alternative 3: No Overnight RV Parking Alternative
Energy				
Impact 3.5-1: Wasteful, Inefficient, or Unnecessary Consumption of Energy, During Project Construction or Operation	NI	LTS	LTS	NI
Geology and Soils				
Impact 3.6-1: Destroy a unique paleontological resource or site or unique geologic feature	LTS MM	NI	LTS MM	LTS MM
Noise				
Impact 3.8-1: Generate a Substantial Increase in Short-Term Construction Noise	LTS	NI	LTS	LTS
Impact 3.8-2: Generate a Substantial Increase in Off-Site Transportation Noise	LTS	NI	LTS	LTS
Impact 3.8-3: Generate a Substantial Increase in Long-Term Stationary Operational Noise	LTS	NI	LTS	LTS
Impact 3.8-4: Generate a Substantial Increase in Short-Term Construction Vibration	LTS	NI	LTS	LTS
Transportation/Traffic				
Impact 3.9-1: Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities	LTS	NI	LTS	LTS
Impact 3.9-2: Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)	LTS	NI	LTS	LTS
Utilities and Service Systems				
Impact 3.11-1: Significant Environmental Effects from the Relocation or Construction of New or Expanded Utility Infrastructure	LTS	NI	LTS	LTS

Notes: NI = No impact; LTS = Less than significant; LTS MM = Less than significant with mitigation measures

6 OTHER CEQA SECTIONS

6.1 GROWTH INDUCEMENT

California Environmental Quality Act (CEQA) Section 21100(b)(5) specifies that the growth-inducing impacts of a project must be addressed in an environmental impact report (EIR). Section 15126.2(d) of the State CEQA Guidelines provides the following guidance for assessing growth-inducing impacts of a project:

> Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a wastewater treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also, discuss the characteristics of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

A project can induce growth directly, indirectly, or both. Direct growth inducement would result if a project involved construction of new housing. Indirect growth inducement would result, for instance, if implementing a project resulted in any of the following:

- substantial new permanent employment opportunities (e.g., commercial, industrial, or governmental enterprises);
- substantial short-term employment opportunities (e.g., construction employment) that indirectly stimulates the need for additional housing and services to support the new temporary employment demand; and/or
- removal of an obstacle to additional growth and development, such as removing a constraint on a required public utility or service (e.g., construction of a major sewer line with excess capacity through an undeveloped area).

Growth inducement itself is not an environmental effect but may foreseeably lead to environmental effects. If substantial growth inducement occurs, it can result in secondary environmental effects, such as increased demand for housing, demand for other community and public services and infrastructure capacity, increased traffic and noise, degradation of air or water quality, degradation or loss of plant or animal habitats, conversion of agricultural and open-space land to urban uses, and other effects.

6.1.1 Growth-Inducing Impacts of the Project

The proposed project includes a travel stop, which would provide professional truck drivers and motorists with 24-hour access to purchase gasoline, diesel, propane, electronics, snacks, travel items, and food from two fast-food restaurants, one with a drive-thru, although these restaurants won't operate 24-hours a day. The project would provide truck, RV and automobile parking areas along with a 10-space overnight RV park on a currently undeveloped parcel. As mentioned in the Project Description of this Draft EIR (Chapter 2.3.3), the project site is adjacent to, and outside the city limits, but within the City's approved Sphere of Influence. As part of the package of regulatory approvals required for the proposed project, the project applicant is requesting that LAFCO approve the annexation of the site into the City of Susanville City Limits, which would take the site out of the current land use planning jurisdiction of Lassen County. The project proposes a General Plan Amendment of the current City land use designation from the existing Light Industry or Business Park General Plan designation to a City *"General Commercial/Shopping Center"* designation and to pre-zone the site to City C-2 (General Commercial/Shopping Center District) zoning district. As such, the project would be consistent with the planning intent for the project site.

The project does not include the construction of new homes and would not increase the residential population in the City of Susanville. Although a 10-space RV parking area is proposed, occupancy would be limited to short-term stays (typically overnight) and would not constitute permanent housing. The project would include various services and amenities, such as a convenience store, fast-food restaurants, and recreational vehicle facilities; however, these services and amenities are intended to serve through-motorists on SR 36 and US 395.

Implementation of the proposed project will result in short-term construction jobs and longer-term permanent employment opportunities to operate and maintain the built project. Project construction is planned to be implemented in phases over a one-year period with individual contractors completing their portion of the project and moving on to the next project. Both short- and long-term jobs are expected to be primarily generated from the local Susanville and larger Lassen County geographic areas, although specialty construction jobs may be sourced from other areas. As construction would be sourced from the local workforce and would not require people to relocate from surrounding communities, construction of the proposed project is not considered growth inducing for this reason.

In terms of permanent employment, the total minimum number of employees needed daily during operations would be approximately 27 employees located on the travel stop site at one time, broken down by 12 total employees daily (3 shifts/day) for Convenience Store and Auto and Truck Fueling and 15 total employees daily (3 shifts/day) for the Fast-Food Restaurants. Many of the employees are expected to be already located in the Susanville and larger Lassen County area. Implementation of the proposed project may induce other land uses to locate nearby that would have not been proposed without the project due to the customer traffic that is generated by the proposed project. The vehicle fueling, convenience store, fast-food restaurants and RV parking area are generally expected to serve the over-road long haul trucking industry, motorists passing through and local residents. While offsite utilities would need to be brought to the site, these would be intended to serve the proposed project only. Any new development in the project vicinity would need to be conducted in accordance with Lassen County General Plan policies and Susanville Vicinity Area Plan and land use and zoning designations, or with City General Plan policies for projects seeking annexation into the City. For this reason, the operation of the proposed project is not expected to be considered growth inducing.

6.2 SIGNIFICANT AND UNAVOIDABLE ADVERSE IMPACTS

The State CEQA Guidelines Section 15126.2(b) requires EIRs to include a discussion of the significant environmental effects that cannot be avoided if the proposed project is implemented. As documented throughout Chapter 3 (project level impacts) and Chapter 4, "Cumulative Impacts," of this Draft EIR, after implementation of the recommended mitigation measures, all of the impacts associated with the proposed project would be reduced to a less-than-significant level. No impacts are considered significant and unavoidable; that is, no feasible mitigation is available to reduce the project's impacts to a less-than-significant level, as all impacts can be reduced to a less-than-significant level.

6.3 SIGNIFICANT AND IRREVERSIBLE ENVIRONMENTAL CHANGES

The State CEQA Guidelines require a discussion of any significant irreversible environmental changes that would be caused by the project. Specifically, the State CEQA Guidelines section 15126.2(c) states:

> Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generation to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

The project would result in the irreversible and irretrievable commitment of energy and material resources during construction and operation, including the following:

- construction materials, including such resources as soil, rocks, wood, concrete, glass, and steel;
- water supply for project construction and operation; and
- energy expended in the form of electricity, diesel fuel, gasoline, and oil for equipment and transportation vehicles that would be needed for project construction and operation.

These nonrenewable resources would represent only a modest portion of the resources available in the region and would not affect the availability of these resources for other needs within the region. Demolition and construction activities would not result in inefficient use of energy or natural resources. During site preparation activities, materials such as concrete would be separated, sorted, and recycled. During construction, contractors would use best available engineering techniques, construction and design practices, and equipment operating procedures.

Resources that would be permanently and continually consumed by project implementation include water, electricity, and fossil fuels. However, the project would meet the Title 24 water and building efficiency standards in effect at the time of construction. See Section 3.5, "Energy," and Section 3.7, "Greenhouse Gas Emissions and Climate Change," for additional information. In accordance with City of Susanville Code of Ordinances, Chapter 17.96 General Development Standards, landscaping may consist of a combination of plant and non-plant material, provided no less than 50% of the required landscaped area shall be living plant material, based on mature plant size. Where appropriate, native plants, xeriscaping, or other drought resistant plants are encouraged. Additionally, sustainability measures would be implemented to improve energy efficiency and increase the use of renewable energy. The project would include solar panels which would be installed in accordance with the California Energy Code requirements. Additionally, the project would commit to inclusion of EV charging/EV capable/EV ready spaces, in accordance with the CALGreen code, and would not include on-site natural gas, except for usage in the commercial kitchens, and would provide bicycle facilities that would meet or exceed the respective codes. The project would align with the VMT reductions in OPR's guidance as the project would result in mostly pass-by trips, as vehicles, trucks, and recreational vehicles divert only 0.14 miles from SR-36 and would not result in a substantial VMT increase, thus helping to reduce VMT, decarbonize the building and help transportation electrification. Therefore, the amount and rate of consumption of these resources would not result in significant environmental impacts related to the unnecessary, inefficient, or wasteful use of resources. Refer to Sections 3.5, "Energy," 3.7, "Greenhouse Gas Emissions," 3.9, "Transportation," and 3.11, "Utilities and Service Systems," for additional information.

With respect to operational activities, compliance with all applicable building codes and other regulations (including those related to recycling solid waste and disposal of sewage) would ensure that natural resources are conserved or recycled to the maximum extent feasible. It is also possible that new technologies or systems would emerge, or would become more cost-effective or user-friendly, that would further reduce the site's reliance upon nonrenewable natural resources. Nonetheless, even with implementation of conservation measures, consumption of natural resources would increase with implementation of the project because the site is currently vacant with no demand for utilities.

If the Susanville City Council and the Lassen County Local Agency Formation Commission ultimately grant the approvals needed for the project to go forward, each decision-making body would be expressly or implicitly concluding that the irretrievable commitments of resources associated with the project are justified in the near term due to the perceived economic, fiscal, or other benefits of the project.

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Chapter 5 Alternatives

No references were used in this chapter.

Chapter 6 Other CEQA Sections

No references were used in this chapter.

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