



Mitigated Negative Declaration

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

1. **Control Number:** PLNP2023-00026
2. **Title and Short Description of Project:** West Elkhorn Gas Station, C-Store, & Pair of Fast Food Restaurants

The proposed project would involve the development of an approximately 4.14-acre undeveloped site at the northwest corner of Marysville Boulevard and West Elkhorn Boulevard in unincorporated Sacramento County. The project would include construction of a 5,208-square-foot fueling canopy, a 3,926-square-foot convenience store, 1,523 square feet of retail space, a 2,364-square-foot car wash, and two quick service restaurants totaling 7,340 square feet. Associated site improvements would include parking, landscaping, stormwater bio-retention basins, and utility connections. The project would require: (1) a General Plan Amendment from Agricultural-Residential (AG-RES) to Commercial and Office (COMM/OFF); (2) a Community Plan Amendment from Agricultural-Residential 2-acre minimum (AR-2) with Agricultural-Residential Preservation Area (ARPA) overlay to General Commercial (GC); and (3) a rezone from AR-2 to General Commercial (GC). A Conditional Use Permit, Tentative Parcel Map, Special Development Permit, and Design Review entitlements would also be required for the proposed gas station and car wash.
3. **Assessor's Parcel Number(s):** 214-0350-003 and 214-0350-004
4. **Location of Project:** Northwest corner of West Elkhorn Boulevard and Marysville Boulevard; unincorporated Sacramento County (Rio Linda/Elverta Community Plan Area)
5. **Project Applicant:** Attention: Leslie Burnside, Senior Project Manager
Barghausen Consulting Engineers, Inc.
18215 72nd Avenue South
Kent, WA 98032
6. Said project will not have a significant effect on the environment for the following reasons:
 - a. It will not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.
 - b. It will not have the potential to achieve short-term, to the disadvantage of long-term, environmental goals.
 - c. It will not have impacts, which are individually limited, but cumulatively considerable.
 - d. It will not have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly.

7. As a result, thereof, the preparation of an environmental impact report pursuant to the Environmental Quality Act (Division 13 of the Public Resources Code of the State of California) is not required.
8. The attached Initial Study has been prepared by the Sacramento County Planning and Environmental Review Division in support of this Mitigated Negative Declaration. Further information may be obtained by contacting the Planning and Environmental Review Division at 827 Seventh Street, Room 225, Sacramento, California, 95814, or phone (916) 874-6141.

A handwritten signature in cursive script that reads "Julie Newton".

Julie Newton
Environmental Coordinator
County of Sacramento, State of California

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APPENDICES

- Appendix A: Air Quality and Greenhouse Gas Emissions Technical Report, prepared by Helix Environmental Planning (2025)
- Appendix B: Environmental Noise & Vibration Assessment, prepared by Bollard Acoustical Consultants Inc. (2025)
- Appendix C: Biological Resources Evaluation, prepared by SWCA (2025)
- Appendix D: Preliminary Jurisdictional Wetland Delineation Report, prepared by SWCA (2025)
- Appendix E: Local Transportation Analysis (LTA), prepared by Kimley-Horn (2026)
- Appendix F: Level 3 Drainage Study, prepared by Core States Group (2026)
- Appendix G: Summary of Energy Consumption, prepared by ESA (2025)

COUNTY OF SACRAMENTO
PLANNING AND ENVIRONMENTAL REVIEW
INITIAL STUDY

PROJECT INFORMATION

PROJECT TITLE: West Elkhorn Gas Station, C-Store, & Pair of Fast Food Restaurants

CONTROL NUMBER: PLNP2023-00026

LEAD AGENCY: County of Sacramento
827 7th Street, Room 225
Sacramento, CA 95814

PROJECT SPONSOR: Attention: Leslie Burnside, Senior Project Manager
Barghausen Consulting Engineers, Inc.
18215 72nd Avenue South
Kent, WA 98032

LOCATION: Northwest corner of West Elkhorn Boulevard and Marysville Boulevard;
unincorporated Sacramento County (Rio Linda/Elverta Community Plan Area)

ASSESSOR'S PARCEL NUMBERS: 214-0350-003-0000 and 214-0350-004-0000

GENERAL PLAN DESIGNATION:
Existing - Agricultural-Residential (AG-RES)
Proposed - Commercial / Office (COMM/OFF)

ZONING:
Existing - Agricultural-Residential 2-acre (AR-2)
Proposed - General Commercial (GC)

PROJECT DESCRIPTION

The West Elkhorn Gas Station, C-Store, & Pair of Fast Food Restaurants (proposed project) would consist of a change in land use classifications from rural residential to commercial, a lot line adjustment and lot split, and, subsequent development of the property as gas station, convenience store, drive-through car wash tunnel and vacuum stalls, retail shop, pair of fast-food restaurants with drive-through service, and ancillary uses.

The land use classifications would include a General Plan Amendment to Commercial/Office (COMM/OFF) from Agricultural-Residential (AG-RES); A Rio Linda / Elverta Community Plan Amendment to General Commercial (GC) from Agricultural-Residential 2-acre (AR-2) with an Agricultural-Residential Preservation Area Overlay (ARPA); and a County Rezone to General Commercial (GC) from Agricultural-Residential 2-acre (AR-2).

The proposed project's site development would include eight gasoline/diesel stations (for a total of 16 fuel dispensers) under a 5,208 -square-foot fueling canopy, a 3,926-square-foot convenience store, 1,523 -square-foot retail space, a 2,364-square-foot car wash, two quick service restaurants (one 3,670 square feet and the other 3,670 square feet), as well as trash enclosures, site landscaping, drive aisles, and 109 parking spaces on an approximately 4.14 acre site. The project would also include a parcel map to subdivide the site into three parcels. The project site is located in northern Sacramento County at the northwest corner of Marysville Boulevard and West Elkhorn Boulevard within the unincorporated Rio Linda/Elverta Community (see **Plate IS-1** and **Plate IS-2**).

PROJECT COMPONENTS

PROJECT PROGRAM

As discussed above, the proposed project would reconfigure the existing two parcels totaling 4.14 acres into three new lots (see **Plate IS-3**). Each new parcel would support specific commercial uses and its related site improvements, as summarized below:

- Lot 1 (approximately 2.15 acres) would be developed as a gas station with attached convenience store, retail shop, and drive-through car wash. The fueling area would contain the eight gas/diesel stations (16 fuel dispensers) under a 5,208-square-foot fueling canopy, seven electric vehicle charging stations, a 3,926-square-foot convenience store, 1,523-square-foot retail space, a 2,363-square-foot car wash, and a 4,759-square-foot bioretention basin.
- Lot 2 (approximately 0.85 acre) would contain the 3,670-square-foot quick service restaurant with drive-through service. This use is included for CEQA analysis purposes only; the applicant does not currently plan to construct this lot.
- Lot 3 (approximately 1.14 acres) would contain the 3,670-square-foot restaurant with drive-through service and a 3,343-square-foot bioretention basin. This use is included for CEQA analysis purposes only; the applicant does not currently plan to construct this lot.

All three lots would include individual refuse enclosures, drive aisles, landscaping, and on-site parking. The project will also include a 7 to 8 foot-tall Concrete Masonry Unit (CMU) wall constructed along the northern project property boundary. The CMU wall will be 7 feet tall along the property boundary of Lot 2 and will increase to 8 feet in height along the property boundary of Lot 1.

Proposed signage would include freestanding monument/pricing signs at the corner of Marysville Boulevard and West Elkhorn Boulevard and at the site's primary driveway entrance along West Elkhorn Boulevard. Additional building-mounted signage would be provided on all structures, including the convenience store, car wash, canopy, and quick-service restaurants, with signs oriented towards both adjacent roadways.

The proposed project would require a General Plan Amendment to change the land use designation from Agricultural Residential (AG-RES) to Commercial and Office (COMM/OFF), a Rio Linda/Elverta Community Plan Amendment to change the land use designation from Agricultural-Residential 2 acres (AR-2) with a Community Plan overlay land use of Agricultural-Residential Preservation Area (ARPA) to General Commercial (GC), and a rezone to change the County Zoning designation from AR-2 to General Commercial (GC).

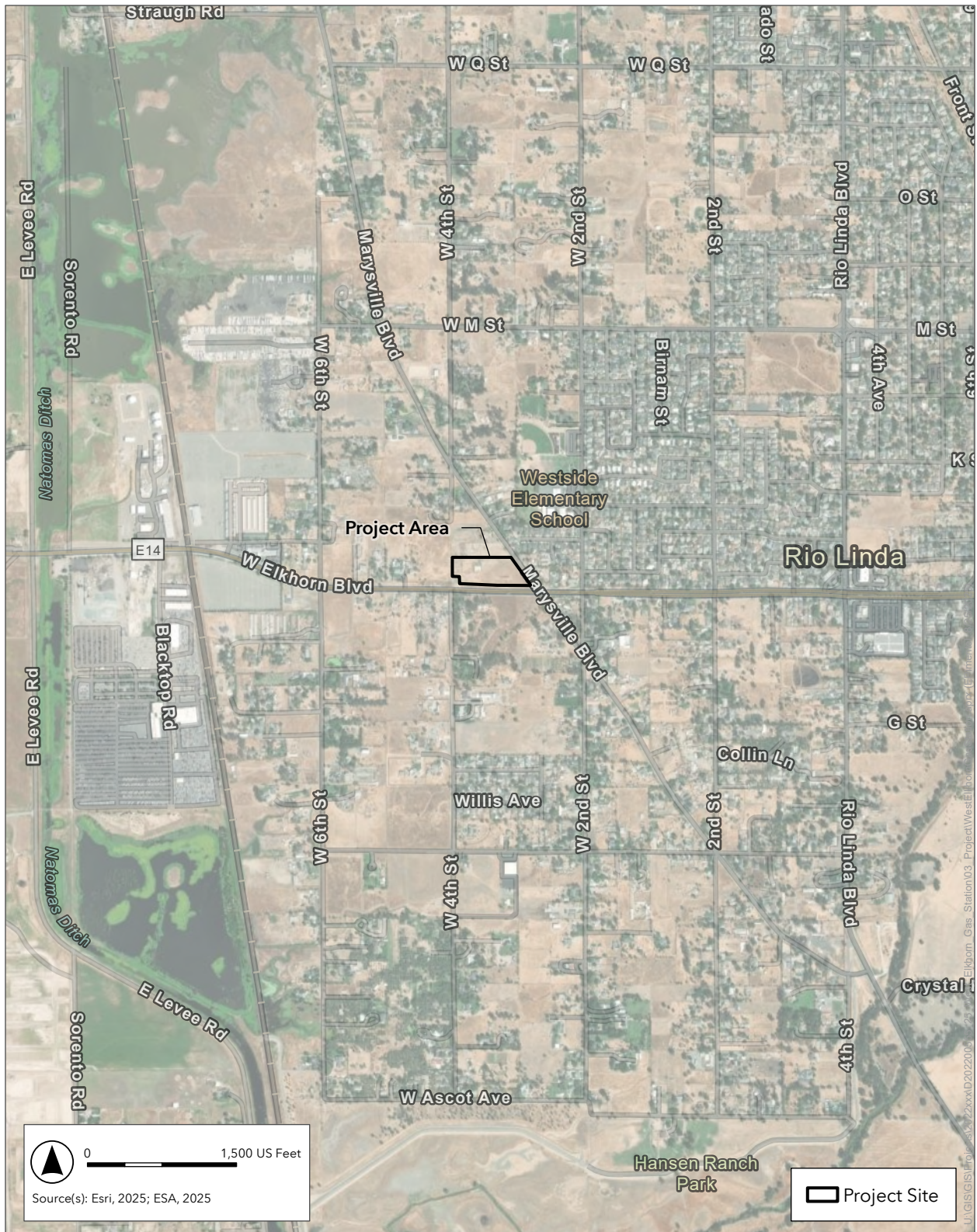


Plate IS-2
Project Location

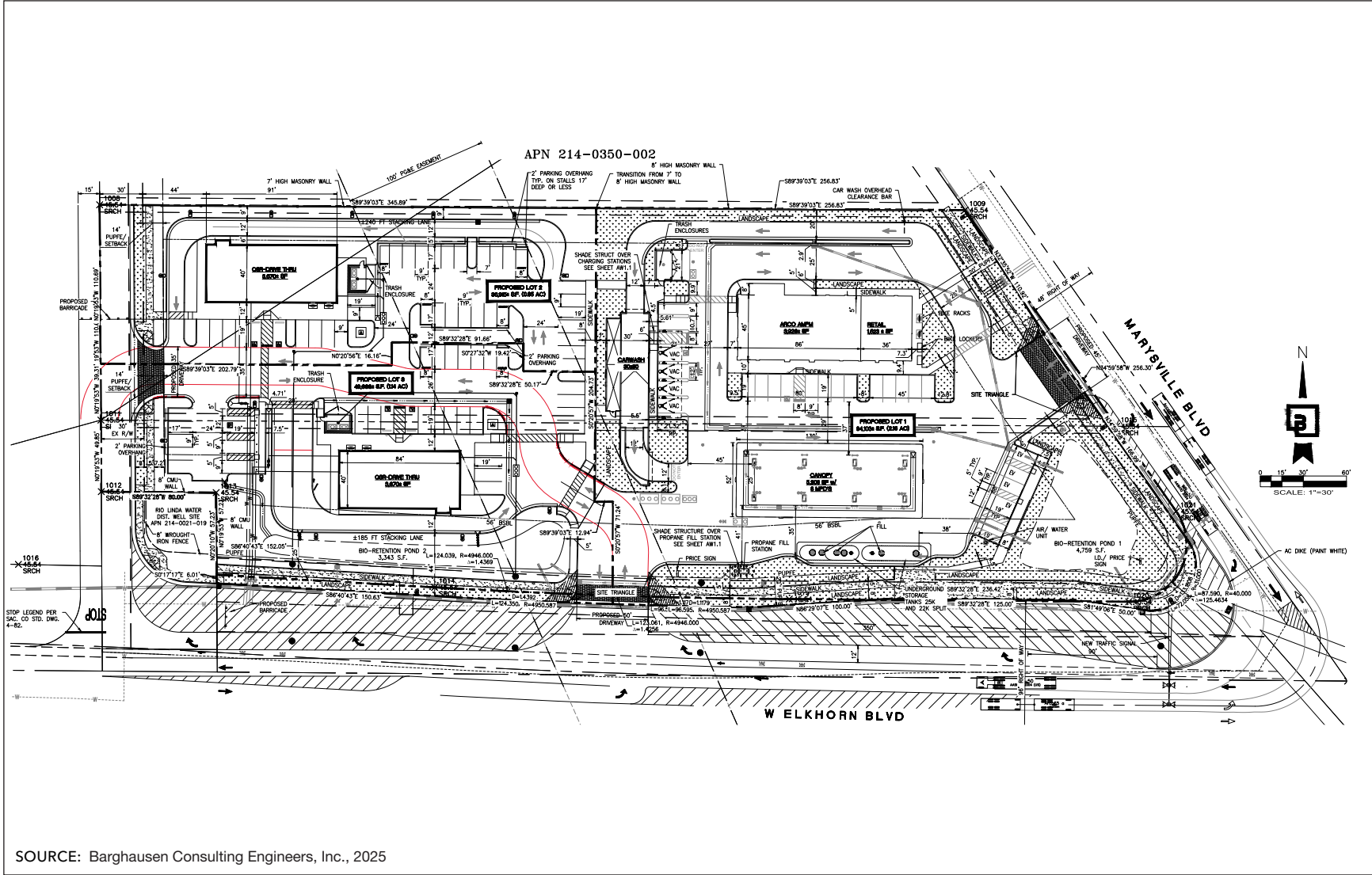


Plate IS-3
Site Plan

CONSTRUCTION

Construction of the proposed project is anticipated to occur over an approximately 11-month period. Project construction activities would include demolition of existing on-site structures, site preparation, grading, excavation for underground utilities and installation of underground storage tanks (USTs), building construction, paving, and architectural coating (e.g., painting). Construction activities would disturb approximately 3.73 acres of soil and result in approximately 976 cubic yards (cy) of imported fill material (2,300-cy cut, 3,275-cy fill, with net 976-cy import).

The proposed project would be developed in phases, with the fueling station, convenience store, and car wash (Lot 1) constructed as Phase 1. Lots 2 and 3 (the quick service restaurants) are conceptual and analyzed in this document for CEQA purposes but are not planned for development at this time. Construction hours will adhere to the standard hours per Sacramento County requirements.¹ The equipment involved in construction would include graders, dozers, tractors/loaders/backhoes, excavators, cranes, forklifts, welders, cement mixers, pavers, rollers, water trucks, and air compressors all assumed to be diesel-fueled.

PARKING AND CIRCULATION

Access to the project site would be provided via three driveways:

- a right-in, right-out ingress/egress driveway on West Elkhorn Boulevard,
- a right-in, right-out ingress/egress driveway on Marysville Boulevard,
- and an ingress/egress driveway along the future extension of West 4th Street, at the western boundary of the project site.

The project would provide a total of 93 parking spaces, distributed as follows:

- Lot 1 (Fueling Station, Convenience Store, Retail Shop, and Drive-Through Car Wash with Vacuum stalls) would provide 24 parking spaces consisting of 14 standard spaces, one Americans with Disabilities Act (ADA) compliant space, one ADA/electric vehicle (EV) charging space, five EV spaces, one ADA/vacuum space, and three vacuum spaces. Fueling positions are not counted.
- Lot 2 (Restaurant Pad 1) would provide 37 parking spaces consisting of 17 standard spaces, two ADA spaces, and 18 compact spaces.
- Lot 3 (Restaurant Pad 2) would provide 32 parking spaces consisting of 17 standard spaces, three ADA spaces, and 12 compact spaces.

Totals: 93 spaces overall. ADA spaces: 8 total, including the ADA/vacuum and ADA/EV stalls. EV spaces: 6 total, including the ADA/EV stall.

¹ Per Sacramento County Code Chapter 6.68.090(e), noise sources associated with construction, repair, remodeling, demolition, paving or grading of any real property, are exempt from maximum noise level requirements, provided said activities do not take place between the hours of 8 p.m. and 6 a.m. on weekdays and Friday commencing at 8 p.m. through and including 7 a.m. on Saturday; Saturdays commencing at 8 p.m. through and including 7 a.m. on the next following Sunday and on each Sunday after 8 p.m.

Pedestrian access to the convenience store would be provided through the gas canopy area and sidewalks along the adjacent roadways. A new bus turnout would be constructed at the southeast corner of the property, along west-bound West Elkhorn Boulevard. Pedestrian access to the quick service restaurants would be provided via associated parking lots and the sidewalk along West Elkhorn Boulevard.

LANDSCAPING

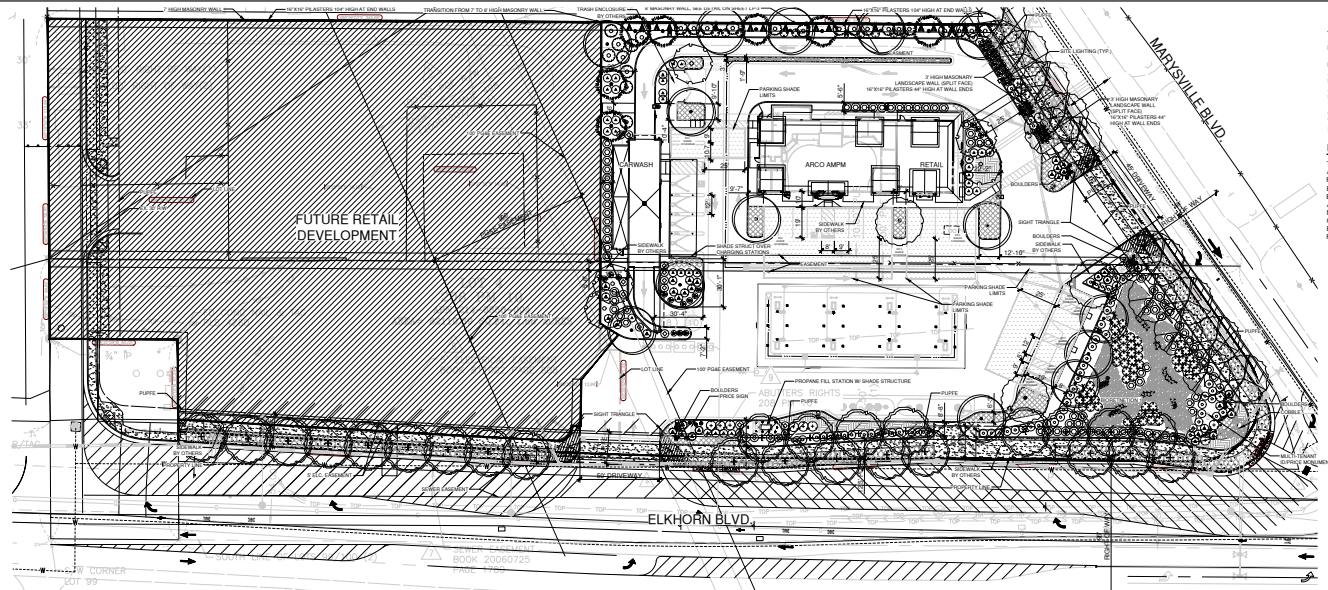
Lot 1 would have a total landscaped area of 20,687 square feet (22.1 percent landscape area ratio), Lot 2 would have a total landscaped area of 8,268 square feet (22.4 percent), and Lot 3 would have a total landscaped area of 11,692 square feet (23.5 percent). Landscaping is primarily proposed around the perimeter of the project site, with additional landscaped islands within parking areas. The landscaping plan would provide trees and plantings to meet County requirements for parking lot shade trees, street trees, and the CALGreen requirement to provide at least 20 percent shade of landscaped areas at plant maturity. Street trees would be installed along West Elkhorn Boulevard and Marysville Boulevard consistent with County frontage standards. Final tree quantities and locations would be refined through improvement plan review to satisfy these standards and to avoid conflicts with underground utilities. The proposed landscaping plan is shown in **Plate IS-4**.

INFRASTRUCTURE AND ROADWAY IMPROVEMENTS

The proposed project would be served by existing utility infrastructure extended to the project site from West Elkhorn Boulevard. Telephone communications, electrical, water, sanitary sewer, storm drain, and irrigation connections would be provided at the southern portion of the project site through utility easements to West Elkhorn Boulevard. Existing SMUD utility poles fronting the project site along Elkhorn Boulevard would be removed and electrical lines would be placed underground.

The project site contains two existing open drainage ditches. One runs in a southwesterly direction across the project site and conveys drainage toward the Phase II development area from the existing subdivision flows from the east and the agricultural areas to the north. The other feature is located along the south and east site boundary and collects and conveys drainage from Marysville Boulevard and Elkhorn Boulevard. A Level 3 Drainage Study was prepared for the proposed project by Core States Group in March 2026 and is included as Appendix F. As described in the Level 3 Drainage Study, the proposed project would install a public main drainage system along Marysville Boulevard and Elkhorn Boulevard to intercept the Nolte flow from the existing subdivision flows from the east. This public main drainage system will connect to the existing drainage infrastructure at the intersection of West 2nd Street and West Elkhorn Boulevard.

Runoff from the developed site would be collected through the proposed storm drain system and routed to two detention basins located near the southern portion of the site, west of the southern driveway. The proposed drainage improvements would also include stormwater quality treatment and controlled discharge features consistent with Sacramento County requirements. Based on the accepted drainage study, the existing downstream culvert beneath West Elkhorn Boulevard has adequate capacity and would not require upsizing as part of the proposed improvements. Final alignment, sizing, and configuration of the drainage improvements would remain subject to refinement during subsequent construction-level drainage design and County review. Furthermore, the proposed project would include two bio-retention ponds: a 4,759-square-foot pond at the southeast corner of the project site (at the corner of Marysville

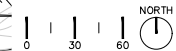


MULCHES

AFTER ALL PLANTING IS COMPLETE, CONTRACTOR SHALL INSTALL 2" THICK LAYER OF 3/4" SHREDED WOOD MULCH, RECYCLED NATURAL (UNWEED), OVER LANDSCAPE FABRIC IN ALL PLANTING AREAS EXCEPT FOR TURF AND SEED AREAS. CONTRACTOR SHALL SUBMIT SAMPLES OF ALL MULCHES TO LANDSCAPE ARCHITECT AND OWNER FOR APPROVAL PRIOR TO CONSTRUCTION. ABSOLUTELY NO EXPOSED GROUND SHALL BE LEFT SHOWING ANYWHERE ON THE PROJECT AFTER MULCH HAS BEEN INSTALLED (SUBJECT TO THE CONDITIONS AND REQUIREMENTS OF THE "GENERAL DRAINING AND PLANTING NOTES" AND SPECIFICATIONS).

ROOT BARRIERS

THE CONTRACTOR SHALL INSTALL ROOT BARRIERS NEAR ALL NEWLY PLANTED TREES THAT ARE LOCATED WITHIN FIVE FEET OF PARKING OR CURBS. ROOT BARRIERS SHALL BE "CENTURY" OR "DEEP-ROOT" 24" DEEP PANELS (OR EQUAL). BARRIERS SHALL BE LOCATED IMMEDIATELY ADJACENT TO HARDSCAPE. INSTALL PANELS PER MANUFACTURER'S RECOMMENDATIONS. UNDER NO CIRCUMSTANCES SHALL THE CONTRACTOR USE ROOT BARRIERS OF A TYPE THAT COMPLETELY ENCLOSE THE ROOTBALL.



PLANT SCHEDULE

SYMBOL	BOTANICAL / COMMON NAME	SIZE	WUCOLS	QTY
TREES				
	URELLULARIA CALIFORNICA	15 GAL	L	25
	ALTERNATE SPECIES	24" BOX	M	7
	ZELKOVA SERRATA VLA. GREEN	15 GAL	VL	5
	ACER RUBRUM 'OT. GLORY'	15 GAL	VL	5
	FICUS PALM MARSHALL	15 GAL	VL	5
	GEUERA PARVIFLORA	15 GAL	VL	5
	AUSTRALIAN WILLOW	15 GAL	VL	5
	NYSSA SYLVATICA	15 GAL	VL	14
	TULEO	15 GAL	VL	14
	ALTERNATE SPECIES	24" BOX	M	7
	TILIA CORDATA	15 GAL	VL	5
	PLATANUS ACERIFOLIA BLOODCOT	15 GAL	VL	5
	URELLULARIA CALIFORNICA	15 GAL	VL	5
	PISTACIA CHINENSIS 'KEITH DAVEY'	24" BOX	L	3
	QUERCUS MUEHLENBERGII	24" BOX	L	14
	CHIONOCHLOA OAK	24" BOX	L	14

PARKING LOT SHADE CALCULATIONS				
		TOTAL PARKING LOT AREA (SF)		9,255
		PARKING LOT SHADE REQUIRED		50%
TREE SPECIES	QTY	DA (FT)	CANOPY AREA (SF)	COVERAGE PERCENTAGE
PISTACHIE CHINENSIS	1	30-35	862.0	100%
PISTACHIE CHINENSIS	2	30-35	962.0	50%
QUERCUS MUEHLENBERGII	6	30-35	962.0	50%
		TOTAL PARKING LOT SHADE REQUIRED (SF)		4,628
		TOTAL PARKING LOT SHADE PROVIDED (SF)		4,641
		PERCENT OF PARKING LOT SHADE PROVIDED		50.2%

SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	WUCOLS	SPACING	QTY
SHRUBS						
	ARCTOSTAPHYLOS HOOKERI 'WAYSIDE'	WAYSIDE HOOKER'S MANZANITA	1 GAL	L	72" o.c.	14
	CHIONOCHLOA THYMIFOLIA 'SKYLARK'	SKYLARK BLUEBLOSSOM	1 GAL	L	80" o.c.	78
	FICUS PALM	CAPRI RUSH	1 GAL	L	80" o.c.	69
	FICUS PALM	CREeping FIG	1 GAL	M	48" o.c.	16
	FICUS PALM	EVE CASE COFFEEBERRY	1 GAL	L	80" o.c.	12
	FICUS PALM	TOYON	1 GAL	L	80" o.c.	25
	FICUS PALM	SPREADING RUSH	1 GAL	L	24" o.c.	12
	FICUS PALM	STONY MOUNTAIN CLOVER	1 GAL	L	24" o.c.	52
	FICUS PALM	PRIN. MURLEY GRASS	1 GAL	L	42" o.c.	48
	FICUS PALM	DEER GRASS	1 GAL	L	80" o.c.	60
	FICUS PALM	ITALIAN BUCKTHORN	1 GAL	L	80" o.c.	19
	FICUS PALM	WHITE SAGE	1 GAL	L	80" o.c.	21
	FICUS PALM	BEES BLISS SAGE	1 GAL	L	80" o.c.	13
GROUND COVERS						
	ARCTOSTAPHYLOS UVA-URSI	KINNICKINICK	1 GAL	L	36" o.c.	112
	CAREX PAMPA	MEADOW SEDGE	1 GAL	L	18" o.c.	864
	DECORATIVE COBBLE	3/4" COBBLE OVER FABRIC	-	-	-	446 SF
	JUNIPERUS PATENS	CALIFORNIA GRAY RUSH	1 GAL	L	24" o.c.	696
	PARKWAY PLANTING	POTENTIAL SPECIES	1 GAL	L	-	5,768 SF
	CAREX PAMPA	MEADOW SEDGE	1 GAL	L	-	-
	LANTANA SP. - LANTANA	LANTANA	1 GAL	L	-	-
	ARCTOSTAPHYLOS UVA-URSI	KINNICKINICK	1 GAL	L	-	-
	ACHILLEA MILLEFOLIUM - YARROW	YARROW	1 GAL	L	-	-
	ROTTBOELLIA GRACILIS - BLUE GRAMA GRASS	BLUE GRAMA GRASS	1 GAL	L	-	-

DECLARATION OF WATER EFFICIENT LANDSCAPE ORDINANCE

I HAVE COMPLIED WITH THE CRITERIA OF THE WATER EFFICIENT LANDSCAPE ORDINANCE AND APPLIED SUCH CRITERIA FOR THE EFFICIENT USE OF WATER IN THE LANDSCAPE DESIGN PLAN.

3.25.2025
DATE
BLAKE TOMELLOSO-RHINEHART, LANDSCAPE ARCHITECT
CA LICENSE #6256
08-31-26
REGISTRATION
EXP. DATE

LANDSCAPE CALCULATIONS

LANDSCAPE AREA PROVIDED: 20,507 SF
TOTAL REQUIRED TREES: 70 TREES (1 PER 300 SF OF LANDSCAPE)
TOTAL PROVIDED TREES: 68 TREES (1 PER 300 SF OF LANDSCAPE)
TURF AREAS PROPOSED: 1,500 SF

PARKING LOT
PARKING SPACES PROPOSED: 45 SPACES
PARKING LOT TREES REQUIRED: 4 TREES (1 PER 10 SPACES)
PARKING LOT TREES PROVIDED: 9 TREES

STREET FRONTAGES
ELKHORN BLVD FRONTAGE LENGTH: 688
REQUIRED TREES: 21.8 TREES (1 PER 30')
PROVIDED TREES: 25 TREES (DOUBLE ROW)
MARYSVILLE BLVD FRONTAGE LENGTH: 390
REQUIRED TREES: 13.0 TREES (1 PER 30')
PROVIDED TREES: 13 TREES (DOUBLE ROW)

GROUND COVERAGE
TOTAL GROUND COVERAGE ALLOWED: 10,843 SF (25%)
TOTAL GROUND COVERAGE PROVIDED: 10,185 SF

TREE REQUIREMENTS
TOTAL TREES PROVIDED: 68 TREES
24" BOX TREES REQUIRED: 23.8 TREES (50%)
24" BOX TREES PROVIDED: 24 TREES
EVERGREEN TREES REQUIRED: 27.2 TREES (40%)
EVERGREEN TREES PROVIDED: 21 TREES

SHRUB REQUIREMENTS
TOTAL SHRUBS PROVIDED: 402 SHRUBS
5-GALLON SHRUBS REQUIRED: 344.4 SHRUBS (70%)
5-GALLON SHRUBS PROVIDED: 384 SHRUBS

SOURCE: Barghausen Consulting Engineers, Inc., 2025

Plate IS-4
Landscape Plan



Boulevard and West Elkhorn Boulevard) and a 3,343-square-foot pond at the southern portion of Lot 3 (along West Elkhorn Boulevard). Stormwater would be conveyed to the bio-retention ponds via surface drainage and underground pipe networks. Each detention pond includes a riser structure with multiple outlet orifices that regulate discharge as the water surface elevation increases. The detention facilities also provide infiltration through the basin bottoms, which further reduces discharge volumes and assists in meeting hydromodification performance criteria. Hydrologic modeling results demonstrate that the proposed detention and outlet control structures successfully attenuate post-development runoff. Under post-construction conditions, overland flow is allowed to be safely released along the project frontage without impacting on-site or adjacent structures, consistent with County criteria.

The proposed project would include improvements to the West Elkhorn Boulevard and West 2nd Street intersection which would result in the expansion of West Elkhorn Boulevard from two lanes to four lanes to resolve the deficiency of vehicles waiting on West 2nd Street to make a southbound lefthand turn, as well as improvements to West Elkhorn Boulevard from West 4th Street to Marysville Boulevard, which would result in the construction of full depth pavement along the project frontage on West Elkhorn Boulevard to provide necessary capacity. These improvements have been coordinated with the Sacramento Department of Transportation (SacDOT).

SURROUNDING LAND USES AND SETTING

The approximately 4.14-acre (180,358 square foot) project site consists of two parcels (Assessor's Parcel Numbers [APNs] 214-0350-003-0000 and 214-0350-004-0000) and is located within a large contiguous swath of rural residential (AR-2 zoning designation) properties, and across Marysville Boulevard to the east is an existing suburban residential community in the northern portion of unincorporated Sacramento County (see **Plate IS-1**). The project site is located on the northwest corner of West Elkhorn Boulevard and Marysville Boulevard (see **Plate IS-2**).

The site's land use classifications are as follows: General Plan: Agricultural-Residential (AG-RES). Special classifications: none apply. Community Plan and overlays: Rio Linda/Elverta Community Plan designation Agricultural-Residential 2-acre (AR-2) with an Agricultural-Residential Preservation Area (ARPA) overlay. County Zoning: Agricultural-Residential 2-acre (AR-2).

The project site is within a large contiguous swath (north, west, and south) of properties within the Rio Linda/Elverta Community Plan's Agricultural-Residential 2-acre (AR-2) with an Agricultural-Residential Preservation Area Overlay (ARPA) land use designations. To the east, across Marysville Boulevard, the single-family neighborhoods are designated Low Density Residential (RD-5) in both the Community Plan and the County Zoning Code.

At the southwest corner of the site is the existing and active Rio Linda / Elverta Community Water District groundwater well #9. The project would not involve groundwater extraction or subsurface construction that would affect this well's operation. Standard compliance with County grading, drainage, and stormwater regulations (including bioretention facilities) would ensure protection of nearby infrastructure. Additionally, an existing unnamed overland drainage swale bisects the property along a northeast-southwest diagonal. A 100-foot wide high-voltage power tower transmission line easement bisects the property along a northwest-southeast diagonal. The western edge of the parcels is an existing road easement for the future expansion of West 4th Street.

Surrounding land uses are primarily agricultural-residential and rural single-family, with scattered vacant parcels. To the north are rural residences with agricultural and equestrian uses. To the east, across Marysville Boulevard, are established single-family neighborhoods. To the south, across West Elkhorn Boulevard, are rural residences with agricultural uses. To the west are a municipal water supply well, single-family residences, and vacant land.

While undeveloped, the project site contains an approximately 4,250-square-foot concrete pad near the center and three structures previously used for stables and storage at the northwest corner. The remainder of the site consists of native grass cover and was historically used as a horse pasture.

REQUESTED ENTITLEMENTS

The following planning entitlements have been requested for the proposed project:

1. A **General Plan Amendment** to change the General Plan land use designation from Agricultural-Residential (AG-RES) to Commercial / Office (COMM/OFF) for two parcels (APNs: 214-0350-003-0000 and 214-0350-004-0000) totaling 180,338 square feet (4.14 acres).
2. A **Rio Linda / Elverta Community Plan Amendment** to change the land use designation from Agricultural-Residential 2-acre minimum (AR-2) with a Community Plan overlay of Agricultural-Residential Preservation Area (ARPA) to General Commercial (GC) for two parcels (APNs: 214-0350-003-0000 and 214-0350-004-0000) totaling 180,338 square feet (4.14 acres).
3. A **Rezone** to change the County Zoning designation from Agricultural-Residential 2-acre minimum (AR-2) to General Commercial (GC) for two parcels (APNs: 214-0350-003-0000 and 214-0350-004-0000) totaling 180,338 square feet (4.14 acres).
4. A **Tentative Parcel Map** to reconfigure the existing two parcels totaling 4.14 acres into three separate parcels (approximately 2.15 acres, 0.85 acre, and 1.14 acres) for the purposes of CEQA analysis. Although the current entitlement request includes only a Lot Line Adjustment, the western parcel is assumed to be further divided (via Parcel Map) into two restaurant pads for environmental review purposes.
5. A **Use Permit** to allow for a new automobile fueling station, convenience store, and drive-through carwash operating 24 hours per day, 7 days a week, 365 days a year. The Use Permit would include deviations from standard separation requirements due to the site's proximity to residential zoning (within 500 feet) and Westside Elementary School (within 1,000 feet), as well as other development standards addressed in the accompanying Special Development Permit within the Light Commercial (LC) zoning district.
6. A **Special Development Permit** to allow deviations from standard development requirements as outlined in the Project Worksheet and illustrated on the project site plan, including but not limited to the following (with other minor deviations—e.g., parking configuration, landscape buffers—also under review by the County):
 - a) Oversized business signs.

- Required: The total area of all signs on an automobile service station site including, but not limited to, all freestanding signs, shall not exceed 125 square feet (SZC § 5.10.5.A.1).
 - Proposed: The proposed aggregate gas station fuel canopy, convenience store, and car wash business signs would be 359-sf (287% of maximum) which is 234sf larger than allowed.
- b) Oversized Corner Monument Sign.
- Required: Freestanding signs are permitted provided there shall not be more than one pole sign on each automobile service station site, nor more than two monument signs. Freestanding signs shall not exceed 16 feet in height. The total area of all freestanding signs shall not exceed 36 square feet, excluding the fuel price sign area. (SZC § 5.10.A.3.a)
 - Proposed: At the southeast corner Elkhorn and Marysville Boulevards, allow a 112-sf monument sign (313% of maximum), which is 76-sf larger than allowed.
- c) Oversized Streetside Monument Sign.
- Required: Freestanding signs are permitted provided there shall not be more than one pole sign on each automobile service station site, nor more than two monument signs. Freestanding signs shall not exceed 16 feet in height. The total area of all freestanding signs shall not exceed 36 square feet, excluding the fuel price sign area. (SZC § 5.10.A.3.a)
 - Proposed: Along Elkhorn Boulevard, allow a 102-sf monument sign (283% of maximum), which is 66-sf larger than allowed.
- d) Landscape Buffer between Drive-Through Land and public road
- Required: When a drive-thru lane is adjacent to the public right-of-way, a minimum 25-ft landscape setback is required between the drive-through lane and the right-of-way, as measured from the back of sidewalk. (SZC 3.9.3.V.1.c). With approval of a Special Development Permit, the 25-ft landscape setback may be reduced to 10-ft with additional screening such as low decorative walls or fences, berms, or enhanced landscaping. (SZC 3.9.3.V.1.f).
 - Proposed: Along Marysville Boulevards, allow an 11-ft wide landscape setback between a drive-thru lane is adjacent to a public right-of-way.
- e) Vehicle and queuing areas to be separated from nearby residential zones with on or offsite intervening structures.
- Required: All customer idling and queuing areas shall be separated from nearby residential zoning districts with on or offsite intervening structures (car wash, service station, or other buildings) or other solid shielding features in addition to any required property line walls (SZC §3.7.9.I.2.d.).
 - Proposed: Along the northern property, allow a drive-through vehicle idling and queuing lane to be 9-ft from the abutting agricultural-residentially zoned property.

(The 9-ft separation includes landscaping bushes, trees, and an 8-ft high block perimeter wall.)

- f) Propane Tank and Shade Structure within front yard setback.
 - Required: Minimum of 56-ft front yard setback along Elkhorn Boulevard (SZC §§ 5.2.1.C & 5.2.4).
 - Proposed: Allow along W Elkhorn Boulevard a 62-sf above-ground propane tank and associated 34-sf shade structure within the front yard setback, 22-ft from the back of curb (39% of minimum), or 34-ft below the minimum setback distance.
 - g) Gas Station Fuel Canopy clear height
 - Required: The maximum gas station fuel canopy clear height is 16-ft (SZC § 3.7.9.C.2.I.i).
 - Proposed: The proposed fuel canopy would have an 18-ft clear height (112% of maximum), which is 2-ft higher than allowed.
7. A **Design Review** to determine substantial compliance with the Sacramento County Countywide Design Guidelines (Design Guidelines).

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

The proposed project may require permits, approvals, or coordination from other public agencies, as applicable, including the following:

- U.S. Army Corps of Engineers
 - Section 404 permit or other applicable authorization related to impacts on jurisdictional waters or wetlands.
- Central Valley Regional Water Quality Control Board
 - Section 401 water quality certification and other applicable water quality approvals.
- California Department of Fish and Wildlife
 - Lake and Streambed Alteration Agreement or other applicable approvals, if required.
- U.S. Fish and Wildlife Service
 - Federal consultation or other applicable approvals, if required.
- Sacramento Metropolitan Air Quality Management District
 - Applicable air quality permits or approvals, if required.
- Sacramento Municipal Utility District

ENVIRONMENTAL CHECKLIST

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

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

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

Less than Significant indicates that a project will have an impact, but the impact is considered minor.

No Impact indicates that a project does not impact the resource.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" or "Less than Significant with Mitigation" as indicated by the checklist on the following pages.

- | | | |
|---|---|---|
| ☐ Aesthetics | ☐ Agriculture and Forestry Resources | ☐ Airports |
| ☒ Air Quality | ☒ Biological Resources | ☒ Cultural Resources |
| ☐ Energy | ☒ Geology and Soils | ☒ Greenhouse Gas Emission |
| ☐ Hazards and Hazardous Materials | ☐ Hydrology and Water Quality | ☐ Land Use and Planning |
| ☐ Mineral Resources | ☒ Noise | ☐ Population and Housing |
| ☐ Public Services | ☐ Recreation | ☐ Transportation |
| ☒ Tribal Cultural Resources | ☐ Utilities and Service Systems | ☐ Wildfire |

I. AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views ¹ of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Notes:

¹ Public views are those that are experienced from a publicly accessible vantage point.**ENVIRONMENTAL SETTING**

The project site currently contains an approximately 4,250-square-foot concrete pad located near the center of the site and three structures previously used for stables and storage located at the northwest corner of the project site. The remainder of the site consists of undeveloped land covered with unmaintained native grasses, which was previously used for a horse pasture. Aboveground power lines extend along the southern boundary, and a wire fence encloses the site. The project site is surrounded by primarily residential, agricultural, and commercial uses. Adjacent parcels include vacant land and residential buildings, primarily single-story family residences to the north, east, and south, with a mix of one- and two-story residences to the west. The site is visible from the surrounding area, most notably from West Elkhorn Boulevard and Marysville Boulevard. There are no scenic resources located within the project site, and it is not located within a scenic view corridor or State scenic highway. The nearest state-designated highway is River Road (State Route 160), approximately 15 miles south of the project site. Garden Highway, a County-designated scenic corridor, is located approximately 5.8 miles southeast. The Sacramento County General Plan specifies a number of County roads that have scenic qualities and are protected by County scenic corridor designations. There are no County designated scenic corridors within the project site vicinity.

Streetlights and other lighting are present throughout the project vicinity. Sources of light and glare are typical of agricultural-residential and suburban developments and include vehicle headlights, streetlights, parking lot lights, security lights, and reflective surfaces such as windows and vehicles.

REGULATORY SETTING

STATE

STATE SCENIC HIGHWAY PROGRAM

The State Scenic Highways Program is designed to protect and enhance the natural scenic beauty of California highways and adjacent corridors through special conservation treatment. The project site is not located near any scenic highways. The closest scenic highway is State Route (SR) 160, which is officially designated as a scenic highway and is located approximately 15 miles southwest of the project site.

LOCAL

SACRAMENTO COUNTY 2030 GENERAL PLAN POLICY LU-31

Strive to achieve a natural nighttime environment and an uncompromised public view of the night sky by reducing light pollution

IMPACT DISCUSSION

a. *Would the project have a substantial adverse effect on a scenic vista?*

No Impact. There are no scenic vistas on or near the project site, and no officially recognized scenic highways are located in proximity or visible from the project site.² The proposed project's impacts as it relates to the visual character of the surrounding area is discussed under "c" below. Therefore, the proposed project would result in no impact on a scenic vista.

b. *Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

No Impact. There are no scenic resources on the project site. The project site is also not located next to a designated scenic highway. The proposed project's impacts as it relates to the visual character of the surrounding area is discussed under "c" below. Therefore, the proposed project would not damage scenic resources and would have no impact.

c. *Would the project, in nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

Less than Significant. The project site is located in an agricultural-residential and developed suburban area, with a single-family residence and land used for equestrian and agricultural uses to the north, Marysville Boulevard to the east, West Elkhorn Boulevard to the south, and undeveloped land with agricultural uses to the west. While the site itself is currently undeveloped, the surrounding land uses include primarily residential and

² California Department of Transportation (Caltrans), 2025. *California State Scenic Highway System Map*. Available at: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>. Accessed July 18, 2025.

agricultural uses as well as vacant land. The project site is currently designated Agricultural-Residential (AG-RES) in the Sacramento County General Plan, with a Rio Linda/Elverta Community Plan designation of Agricultural-Residential, 2-acre minimum (AR-2) and an overlay of Agricultural-Residential Preservation Area (ARPA). The current zoning designation for the site is also AR-2. The proposed project would require a General Plan Amendment to change the land use designation to Commercial / Office (COMM/OFF), a Community Plan Amendment to change the designation to General Commercial (GC), and a Rezone to change the zoning designation to GC. The proposed project would also be subject to the County's Design Review to determine substantial compliance with the County's Design Guidelines.

Implementation of the proposed project would convert undeveloped land into a developed commercial use, altering the visual character of the project site. The proposed project would include one-story structures including a gas station, convenience store, retail space, car wash, and two quick-service restaurants. Views of the site from Marysville Boulevard and West Elkhorn Boulevard would change as a result of development, but these views would be brief in duration to passing vehicles and pedestrians utilizing the roadways. The proposed heights of the buildings would be consistent with the development within the surrounding agricultural-residential area and nearby suburban uses. Furthermore, the proposed commercial uses would be consistent with the new GC zoning and COMM/OFF land use designations requested for the project. In addition, the project's design, development, and maintenance standards would comply with the Sacramento County 2030 General Plan, Zoning Code, Design Guidelines, and other applicable regulations for scenic quality, ensuring consistency with the character of nearby developed areas. Implementation of the proposed project would not substantially degrade public views and would not conflict with applicable regulations governing scenic quality. Therefore, the impact on visual character would be less than significant.

- d. *Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

Less than Significant. The project site is located in an agricultural-residential area with nearby suburban uses which consist of a variety of existing light sources typical of agricultural-residential and residential uses. Primary sources of light adjacent to the project site include building-mounted and perimeter lighting, interior lighting visible through windows, streetlights, and headlights from vehicles on nearby streets. The site itself is currently undeveloped and contains no existing light sources other than the existing streetlight on the corner of Marysville Boulevard and West Elkhorn Boulevard.

Development of the proposed project would include new nighttime lighting fixtures around the buildings, parking lot lighting, interior lighting visible through windows, lighting associated with additional vehicle traffic, and new street and site lighting. A photometric plan indicates on-site lighting from the proposed buildings and signage would be fully shielded, with spillover limited to adjacent rights-of-way (Marysville Boulevard and West Elkhorn Boulevard), and compliant with County illumination limits at property lines.³ Although overall lighting levels would increase compared to existing site conditions, fixtures would be directed downward with cut-off optics and under-canopy shielding, preventing adverse effects on nearby residences. The proposed project would therefore only incrementally add

³ PLNP2023-00026 West Elkhorn Gas Station, C-Store, & Pair of Fast Food Restaurants, Plan Set (sub #8). April 5, 2025. Accessed July 18, 2025.

to background lighting levels already present from the surrounding street lighting and nearby suburban development. The project would adhere to applicable County policies and regulations intended to minimize light and glare, including General Plan Policy LU-31, which seeks to protect nighttime views and limit forward light, backlight, and uplight. The project would also comply with Sacramento County Zoning Code 3.7.9.C. Automobile Service Station, Section 2.h. which stipulates that on-site lighting shall be designed, controlled, and maintained so that no source of light is visible from off the property; lighting does not unreasonably disturb occupants of adjacent properties; and does not interfere with traffic. Furthermore, there shall be no flashing, moving, or animated lights on automobile service station sites. Additionally, Zoning Code Section 5.9.4.G. Parking Area Lighting, stipulates that lighting shall be constructed with full shielding and/or recessed to reduce light trespass to adjoining properties with each fixture directed downward and away from adjoining properties and public right-of-way so that no light fixture directly illuminates an area outside of the site, and the light source is not visible from residential properties. Therefore, impacts related to light would be minimal.

The primary source of glare near the project site is sunlight reflecting off passing vehicles. The proposed project would introduce new reflective surfaces, such as windows and vehicles; however, building finishes would be non-specular and consistent with County design standards. In addition, landscaping, including new street trees, would provide canopy coverage that reduces glare from buildings and parked vehicles as landscaping matures. Therefore, glare impacts from the proposed project would be less than significant.

ENVIRONMENTAL MITIGATION MEASURES

None recommended.

II. AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts on agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Introduce incompatible uses in the vicinity of existing agricultural uses?	☐	☐	☒	☐
d. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
e. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
f. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

ENVIRONMENTAL SETTING

The project site is currently undeveloped with vegetation characterized by unmaintained native grasses. Surrounding development includes a mix of agricultural-residential and residential uses, paved roadways, and ornamental landscaping. According to the California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP), the site is classified as "Other Land" and is surrounded by areas designated as "Other Land", "Urban and Built-Up Land", and "Grazing Land".⁴ There are no forest or timber resources in the vicinity of the project.

⁴ California Department of Conservation, Division of Land Resource Protection 2022. *California Important Farmland Finder*. Available at: <https://maps.conservation.ca.gov/dlrp/ciff/>. Accessed July 18, 2025.

IMPACT DISCUSSION

- a. *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*

No Impact. As discussed above, the project site does not contain land that is classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance under the California Department of Conservation's Important Farmland Finder as part of the Farmland Mapping and Monitoring Program. The project site is classified as "Other Land" which is defined as undeveloped and nonagricultural land surrounded on all sides by urban development and greater than 40 acres.^{5,6} Because the site does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, the proposed project would not convert any Important Farmland to non-agricultural uses, and there would be no impact.

- b. *Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?*

Less than Significant. The project site is currently zoned as Agricultural-Residential 2-acre minimum (AR-2). The project site is not under current agricultural use and may require site modification or demolition of features from previous uses to be effectively used for agricultural purposes. The current site conditions include heavily disturbed areas that include the presence of a partially deteriorated concrete pad and areas of compacted soil. Vegetation in this area is generally sparse and patchy, with compacted or bare soils resulting from repeated livestock use.

The proposed project, which would include construction and operation of a gas station, convenience store, retail space, a car wash, and two quick-service restaurants, which would not be consistent with the existing AR-2 zone. The proposed project would require a rezone to change the zoning to General Commercial (GC). The GC zone permits a broad range of commercial uses, including more intense uses such as small warehousing operations, auto repair shops, and truck service stations, and is intended for commercial uses that would not be appropriate in the more restrictive commercial districts.

While the project would not be consistent with surrounding AR-2 zone, the project would not be incompatible with or prevent the ongoing or future use of other properties for agricultural uses within the adjacent agricultural-residential area. Additionally, the project site is not enrolled in a Williamson Act contract.⁷ Therefore, the proposed project would not have a substantial conflict with existing agricultural zoning or a Williamson Act contract, and the resulting impact would be less than significant.

⁵ Ibid.

⁶ California Department of Conservation, 2025. *Important Farmland Categories*. Available at: <https://www.conservation.ca.gov/dlrp/fmmp/Pages/Important-Farmland-Categories.aspx>. Accessed July 18, 2025.

⁷ California Department of Conservation, 2024. *Williamson Act Enrollment Finder*. Available at: https://maps.conservation.ca.gov/dlrp/WilliamsonAct/App/index.html#data_s=id%3Awidget_22_output_cofig_default_geocode_0_0%3A0. Accessed July 18, 2025.

- c. *Would the project introduce incompatible uses in the vicinity of existing agricultural uses?*

Less than Significant. The project site is surrounded by areas zoned as AR-2 to the north, south, and west. However, neither the project site nor the surrounding area is designated as Important Farmland (i.e., Prime Farmland, Unique Farmland, or Farmland of Statewide Importance) by the California Department of Conservation's Farmland Mapping and Monitoring Program. The project site is designated as "Other Land" and is bordered by areas designated as "Urban and Built-Up Land" to the east and "Other Land" to the north, south, and west. Additionally, lands designated as "Grazing Land" are present to the south and southwest of the project site.⁸ Surrounding land uses around the project site are characterized primarily by rural residential, agricultural-residential, vacant, and open space uses, with limited small-scale agricultural activity and pastureland rather than intensive commercial farming operations. Although the surrounding area may still support agricultural uses, the proposed project would be located at the intersection of two major roadways and adjacent to existing residential and urbanized development patterns. As such, the project would not introduce a land use that would interfere with or conflict with ongoing agricultural activities in the surrounding vicinity. Therefore, the proposed project would not result in incompatible uses in the vicinity of existing agricultural uses.

- d. *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Government Code Section 51104(g))?*

No Impact. The proposed project site does not contain forest land and is not zoned for forest land (as defined in Public Resources Code §12220(g)), timberland (as defined by Public Resources Code §4526), or Timberland Production (as defined by Government Code §51104(g)). The project site is located in an urbanizing area adjoining other suburban and developed land uses. As such, there would be no impact to forestry and timberland and timberland production/resources.

- e. *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*

No Impact. As discussed above, the project site does not contain any forest land, nor is it designated for forestry uses. The proposed project would not result in the loss or conversion of forest land to non-forest use. Therefore, there would be no impact.

- f. *Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?*

No Impact. The project site is located in an urbanizing setting comprised primarily of agricultural-residential uses with nearby suburban uses. The proposed project would not involve changes that could indirectly result in conversion of Farmland to non-agricultural use or forest land to non-forest use. Therefore, there would be no impact.

ENVIRONMENTAL MITIGATION MEASURES

None recommended.

⁸ California Department of Conservation, Division of Land Resource Protection 2022. *California Important Farmland Finder*. Available at: <https://maps.conservation.ca.gov/dlrp/ciff/>. Accessed July 18, 2025.

III. AIRPORTS

Would the project:	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
a. Result in a safety hazard for people residing or working in the vicinity of an airport/airstrip?	☐	☐	☐	☒
b. Expose people residing or working in the project area to aircraft noise levels in excess of applicable standards?	☐	☐	☐	☒
c. Result in a substantial adverse effect upon the safe and efficient use of navigable airspace by aircraft?	☐	☐	☐	☒
d. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒

ENVIRONMENTAL SETTING

The project site is in unincorporated Rio Linda, Sacramento County. The nearest aviation facility is Rio Linda Airport, a private airstrip located approximately 1.25 miles southeast of the site. McClellan Airfield is approximately 3.5 miles to the southeast, and Sacramento International Airport is approximately 5.5 miles to the west. According to the Rio Linda Airport Comprehensive Land Use Plan, the project site lies outside of the Rio Linda Airport policy areas subject to the ACLUP, including the Clear Zone, Approach–Departure Zone, and Overflight Zone. The Airport Safety Zones Map (Figure 9 of the Rio Linda ACLUP) is presented in Appendix B. The site is within two miles of a private airstrip and is not within the safety zones of a public-use airport.

IMPACT DISCUSSION

- a. *Would the project result in a safety hazard for people residing or working in the vicinity of an airport/airstrip?*

No Impact. The project site is not located within an airport land use safety zone, within which applicable ACLUP policy areas would be applicable to the project. The nearest airport, the Rio Linda Airport, is approximately 1.25 miles southeast of the project site, and McClellan Airfield is approximately 3.5 miles southeast of the project site. Given this distance, the proposed project would not expose residents, employees, or visitors to airport-related safety hazards. Therefore, no impact would occur.

- b. *Would the project expose people residing or working in the project area to aircraft noise levels in excess of applicable standards?*

No Impact. The project site is not located within the 60 dB Community Noise Equivalent Level (CNEL) noise contours of either Rio Linda Airport, Sacramento International Airport or McClellan Airfield, as mapped by the Sacramento County ALUC. Therefore, the proposed project would not expose people residing or working in the project area to excessive aircraft noise levels and no impact would occur.

- c. *Would the project result in a substantial adverse effect upon the safe and efficient use of navigable airspace by aircraft?*

No Impact. The project would develop a gas station, convenience store, retail space, car wash, and restaurants, none of which involve structures of sufficient height to require FAA review under 14 CFR Part 77. As such, the project would not interfere with navigable airspace or aircraft operations and no impact would occur.

- d. *Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?*

No Impact. The project would not generate aviation activity or otherwise alter air traffic patterns at nearby airports. Therefore, the project would not affect air traffic levels or safety, and no impact would occur.

ENVIRONMENTAL MITIGATION MEASURES

None recommended.

IV. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

Would the project:	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☒	☐	☐
b. Result in 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?	☐	☒	☐	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

The following environmental and regulatory settings and analysis were obtained from the *West Elkhorn ARCO ampm/Commercial Project Air Quality and Greenhouse Gas Emissions Technical Report* prepared by Helix Environmental Planning, dated March 2025, and included as Appendix A to this Initial Study.⁹

ENVIRONMENTAL SETTING

CLIMATE AND METEOROLOGY

The proposed project is located within the Sacramento Valley Air Basin (SVAB). The climate of the SVAB is characterized by hot dry summers and mild rainy winters. During the year, the temperature may range from 20 to 115 degrees F with summer highs usually in the 90s and winter lows occasionally below freezing. Average annual rainfall is about 20 inches with snowfall being very rare. The prevailing winds are moderate in strength and vary from moist breezes from the south to dry land flows from the north.

The mountains surrounding the Sacramento Valley create a barrier to airflow, which can trap air pollutants in the valley when certain meteorological conditions are right, and a temperature inversion (areas of warm air overlying areas of cooler air) exists. Air stagnation in the autumn and early winter occurs when large high-pressure cells lie over the valley. The ozone season (May through October) in the SVAB is characterized by stagnant morning air or light winds with the breeze arriving in the afternoon out of the southwest from the San Francisco Bay. Usually, the evening breeze transports the airborne pollutants to the north out of the SVAB. During about half of the days from July to September, however, a phenomenon called the “Schultz Eddy”

⁹ Helix Environmental Planning, 2025. West Elkhorn ARCO ampm/Commercial Project Air Quality and Greenhouse Gas Emissions Technical Report. March 2025.

prevents this from occurring. Instead of allowing for the prevailing wind patterns to move north carrying the pollutants out of the valley, the Schultz Eddy causes the wind pattern and pollutants to circle back southward. This phenomenon's effect exacerbates the pollution levels in the area and increases the likelihood of violating the federal and state air quality standards.¹⁰

The predominant wind direction in the vicinity of the project site is from the southeast, and the average wind speed is approximately 7.7 mph.¹¹

AIR QUALITY POLLUTANTS

CRITERIA AIR POLLUTANTS

Criteria pollutants are defined by state and federal law as a risk to the health and welfare of the general public. In general, criteria air pollutants include the following compounds:

- Ozone (O₃)
- Carbon Monoxide (CO)
- Nitrogen Dioxide (NO₂)
- Particulate Matter (PM), which is further subdivided:
 - Coarse PM, 10 microns or less in diameter (PM₁₀)
 - Fine PM, 2.5 microns or less in in diameter (PM_{2.5})
- Sulfur Dioxide (SO₂)
- Lead (Pb)

Criteria pollutants can be emitted directly from sources (primary pollutants; e.g., CO, SO₂, PM₁₀, PM_{2.5}, and Pb), or they may be formed through chemical and photochemical reactions of precursor pollutants in the atmosphere (secondary pollutants; e.g., O₃, NO₂, PM₁₀, and PM_{2.5}). PM₁₀ and PM_{2.5} can be both primary and secondary pollutants. The principal precursor pollutants of concern are reactive organic gases ([ROGs] also known as volatile organic compounds [VOCs])¹² and nitrogen oxides (NOx).

The descriptions of sources and general health effects for each of the criteria air pollutants are shown in Table IS-1, *Summary of Common Sources and Human Health Effects of Criteria Air Pollutants*, based on information provided by the California Air Resources Board (CARB) and the United States Environmental Protection Agency (USEPA).¹³ Specific adverse health effects on individuals or population groups induced by criteria pollutant emissions are highly dependent on a multitude of interconnected variables such as cumulative concentrations, local meteorology and atmospheric conditions, and the number and characteristics of exposed individuals (e.g.,

¹⁰ Helix Environmental Planning, 2025 (pg. 36). West Elkhorn ARCO ampm/Commercial Project Air Quality and Greenhouse Gas Emissions Technical Report. March 2025.

¹¹ Ibid.

¹² CARB defines and uses the term ROGs while the USEPA defines and uses the term VOCs. The compounds included in the lists of ROGs and VOCs and the methods of calculation are slightly different. However, for the purposes of estimating criteria pollutant precursor emissions, the two terms are often used interchangeably.

¹³ Helix Environmental Planning, 2025 (pg. 14). West Elkhorn ARCO ampm/Commercial Project Air Quality and Greenhouse Gas Emissions Technical Report. March 2025.

age, gender). Criteria pollutant precursors (ROG and NO_x) affect air quality on a regional scale, typically after significant delay and distance from the pollutant source emissions. Health effects related to O₃ and NO₂ are, therefore, the product of emissions generated by numerous sources throughout a region. Emissions of criteria pollutants from vehicles traveling to or from the project site (mobile emissions) are distributed nonuniformly in location and time throughout the region, wherever the vehicles may travel. As such, specific health effects from these criteria pollutant emissions cannot be meaningfully correlated to the incremental contribution from the project.

Table IS-1: Summary of Common Sources and Human Health Effects of Criteria Air Pollutants

Pollutant	Major Man-Made Source	Human Health Effects
Carbon Monoxide (CO)	An odorless, colorless gas formed when carbon in fuel is not burned completely; a component of motor vehicle exhaust.	Reduces the ability of blood to deliver oxygen to vital tissues, affecting the cardiovascular and nervous system. Impairs vision, causes dizziness, and can lead to unconsciousness or death.
Nitrogen Dioxide (NO ₂)	A reddish-brown gas formed during fuel combustion for motor vehicles and industrial sources. Sources include motor vehicles, electric utilities, and other sources that burn fuel.	Respiratory irritant; aggravates lung and heart problems. Precursor to ozone and acid rain. Contributes to climate change and nutrient overloading, which deteriorates water quality. Causes brown discoloration of the atmosphere.
Ozone (O ₃)	Formed by a chemical reaction between reactive organic gases (ROGs) and nitrogen oxides (NO _x) in the presence of sunlight. Common sources of these precursor pollutants include motor vehicle exhaust, industrial emissions, gasoline storage and transport, solvents, paints, and landfills.	Irritates and causes inflammation of the mucous membranes and lung airways; causes wheezing, coughing, and pain when inhaling deeply; decreases lung capacity; aggravates lung and heart problems. Damages plants; reduces crop yield. Damages rubber, some textiles, and dyes.
Particulate Matter (PM ₁₀ and PM _{2.5})	Produced by power plants, steel mills, chemical plants, unpaved roads and parking lots, wood-burning stoves and fireplaces, automobiles, and other sources.	Increased respiratory symptoms, such as irritation of the airways, coughing, or difficulty breathing; aggravated asthma; development of chronic bronchitis; irregular heartbeat; nonfatal heart attacks; and premature death in people with heart or lung disease. Impairs visibility (haze).
Sulfur Dioxide (SO ₂)	A colorless, nonflammable gas formed when fuel containing sulfur is burned, when gasoline is extracted from oil, or when metal is extracted from ore. Examples are petroleum refineries, cement manufacturing, metal processing facilities, locomotives, and ships.	Respiratory irritant. Aggravates lung and heart problems. In the presence of moisture and oxygen, sulfur dioxide converts to sulfuric acid, which can damage marble, iron, and steel. Damages crops and natural vegetation. Impairs visibility. Precursor to acid rain.
Lead (Pb)	Metallic element emitted from metal refineries, smelters, battery manufacturers, iron and steel producers, use of leaded fuels by racing and aircraft industries.	Anemia, high blood pressure, brain and kidney damage, neurological disorders, cancer, lowered IQ. Affects animals, plants, and aquatic ecosystems.
<i>Notes: IPCC = Intergovernmental Panel on Climate Change; GWP = global warming potential; HFC = hydrofluorocarbon; PFC = perfluorocarbon</i> <i>Source: Helix, 2025; Table 1 (pg. 18)</i>		

TOXIC AIR CONTAMINANTS

The Health and Safety Code (§39655, subd. (a).) defines a toxic air contaminant (TAC) as “an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health.” A substance that is listed as a hazardous air pollutant pursuant to subsection (b) of Section 112 of the Federal Clean Air Act (CAA) (42 United States Code Section 7412[b]) is a TAC. Under State law, the California Environmental Protection Agency (CalEPA), acting through CARB, is authorized to identify a substance as a TAC if it determines the substance is an air pollutant that may cause or contribute to an increase in mortality or an increase in serious illness, or that may pose a present or potential hazard to human health. The following describes the types of TACs that could be emitted during construction and operation of the proposed project.

Diesel Particulate Matter

Diesel engines emit a complex mixture of air pollutants, including both gaseous and solid material. The solid material in diesel exhaust is referred to as diesel particulate matter (DPM). Almost all DPM is 10 microns or less in diameter, and 90 percent of DPM is less than 2.5 microns in diameter.¹⁴ Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung. In 1998, CARB identified DPM as a TAC based on published evidence of a relationship between diesel exhaust exposure and lung cancer and other adverse health effects. DPM has a notable effect on California’s population—it is estimated that about 70 percent of total known cancer risk related to air toxics in California is attributable to DPM.¹⁵

TAC Emissions from Gasoline Fueling and Transfer

Gasoline vapor consists of a mixture of organic gases, including seven gases classified as TACs with quantifiable health risk factors: benzene, ethyl benzene, n-hexane, naphthalene, propylene (or propene), xylenes and toluene.¹⁶ TACs associated with diesel vapor are not released in quantities sufficient enough to require analysis or reporting. For example, gasoline in the U.S. contains 0.6 to 1.3 percent benzene by volume, diesel fuel contains less than 0.02 percent benzene.¹⁷ See Appendix A for a discussion of the health effects associated with exposure to gasoline-related TAC emissions.

SACRAMENTO VALLEY AIR BASIN ATTAINMENT STATUS

Air quality is defined by ambient air concentrations of specific pollutants identified by the US EPA and CARB to be of concern with respect to health and welfare of the general public. The National Ambient Air Quality Standards (NAAQS) identify concentrations of pollutants in the ambient air below which no adverse effects on public health and welfare are anticipated. California has established a similar set of criteria for O₃, CO, NO₂, SO₂, and PM, referred to as the California Ambient Air Quality Standards (CAAQS), which are generally more stringent than the NAAQS.

¹⁴ Helix Environmental Planning, 2025 (pg. 19). West Elkhorn ARCO ampm/Commercial Project Air Quality and Greenhouse Gas Emissions Technical Report. March 2025.

¹⁵ Ibid. (pg. 19)

¹⁶ Ibid. (pg. 19)

¹⁷ Ibid. (pg. 19)

The US EPA and CARB have classified air basins (or portions thereof) as being in “attainment,” “nonattainment,” “maintenance,” or “unclassified” for each criteria air pollutant, based on whether the NAAQS and CARB have been achieved, respectively. Upon attainment of a standard for which an area was previously designated nonattainment, the area would be classified as a maintenance area. If an area is designated unclassified, it is because inadequate air quality data were available as a basis for a nonattainment or attainment designation.

Sacramento County is designated attainment, maintenance, or unclassified for all NAAQS and CAAQS criteria air pollutants, except for the following:

- NAAQS 8-hour O₃ (Nonattainment – Serious)
- NAAQS PM_{2.5} (Nonattainment – Moderate)
- CAAQS 1- and 8-hour O₃ (Nonattainment)
- CAAQS PM₁₀ (Nonattainment)

See section 2.1.2.1 and 2.1.3.1 of Appendix A for more information on the project site’s attainment status.

SENSITIVE RECEPTORS

CARB and the Office of Environmental Health Hazard Assessment (OEHHA) have identified the following groups of individuals (sensitive receptors) as the most likely to be affected by air pollution: the elderly over 65, children under 14, infants (including in utero in the third trimester of pregnancy), and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis. Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved and are referred to as sensitive receptor locations. Examples of these sensitive receptor locations are residences, schools, hospitals, and daycare centers.¹⁸

The closest existing sensitive receptor location to the project site is a single-family home with outdoor use spaces and the physical residence located approximately 70 and 90 feet east of the project site, respectively, across Marysville Boulevard. The closest school is Westside Elementary School with outdoor recreation areas starting approximately 350 feet northeast of the project site. There are no hospitals or daycare centers within one mile of the project site.

REGULATORY SETTING

FEDERAL

FEDERAL CLEAN AIR ACT

The US EPA is responsible for enforcing the federal CAA of 1970 and its 1977 and 1990 Amendments. The federal CAA requires the US EPA to establish NAAQS. In response, the US EPA has established both primary and secondary standards for several criteria pollutants. On February 7, 2024, the US EPA announced a final rule to lower the annual arithmetic mean (AAM) primary NAAQS for PM_{2.5} from 12 µg/m³ to 9 µg/m³. The new final rule retains the

¹⁸ Ibid. (pg. 35)

existing 24-hour primary NAAQS for PM_{2.5} of 35 µg/m³ and the existing AAM secondary NAAQS for PM_{2.5} of 15.0 µg/m³.¹⁹

STATE

CALIFORNIA CLEAN AIR ACT

The federal CAA allows states to adopt ambient air quality standards and other regulations provided that they are at least as stringent as federal standards. CARB, a part of the CalEPA, is responsible for the coordination and administration of both federal and state air pollution control programs within California, including setting the CAAQS. CARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hairspray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions.

STATE IMPLEMENTATION PLAN

The federal CAA requires areas with unhealthy levels of ozone, inhalable particulate matter, carbon monoxide, nitrogen dioxide, and sulfur dioxide to develop plans, known as State Implementation Plans (SIPs). SIPs are comprehensive plans that describe how an area will attain the NAAQS. The 1990 amendments to the CAA set deadlines for attainment based on the severity of an area's air pollution problem.

SIPs are not single documents; they are a compilation of new and previously submitted plans, programs (e.g., monitoring, modeling, permitting), district rules, state regulations and federal controls. Many of California's SIPs rely on a core set of control strategies, including emission standards for cars and heavy trucks, fuel regulations, and limits on emissions from consumer products. State law makes CARB the lead agency for all purposes related to the SIP. Local air districts and other agencies prepare SIP elements and submit them to CARB for review and approval. CARB forwards the SIP revisions to the US EPA for approval and publication in the Federal Register. The Code of Federal Regulations (CFR) Title 40, Chapter I, Part 52, Subpart F, Section 52.220 lists all the items that are included in the California SIP.²⁰ At any one time, several California submittals are pending US EPA approval.

LOCAL

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

Air quality in Sacramento County is regulated by the Sacramento Metropolitan Air Quality Management District (SMAQMD). As a regional agency, the SMAQMD works directly with the Sacramento Area Council of Governments (SACOG), County transportation commissions, and local governments and cooperates actively with all federal and state government agencies. The SMAQMD develops rules and regulations; establishes permitting requirements for stationary sources; inspects emissions sources; and enforces such measures through educational programs or fines, when necessary.

¹⁹ Ibid. (pg. 21)

²⁰ Ibid. (pg. 23)

AIR QUALITY PLANS

The current air quality plan applicable to the project, the *Sacramento Regional 2015 NAAQS 8-Hour Ozone Attainment and Reasonable Further Progress Plan* (Regional Ozone Plan), was developed by SMAQMD and an adjacent air district to describe how the air districts in and near the Sacramento metropolitan area will continue the progress toward attaining state and national ozone air quality standards.²¹ In addition to not attaining the federal or state ozone standards, the region is classified as nonattainment for the federal PM_{2.5} standard and the state PM₁₀ standard. The SIP contains all plans, programs, and regulations for attainment of the PM NAAQS in Sacramento County.

Rules and Regulations

The following rules promulgated by the SMAQMD would be applicable to construction and/or operation of the project.

- **Rule 202 – New Source Review.** Provides for the issuance of authorities to construct and permits to operate at new and modified stationary air pollution sources, including for the construction and operation of a retail gasoline dispensing facility.²²
- **Rule 402 – Nuisance.** Prohibits the discharge of such quantities of air contaminants or other materials which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or the public.²³
- **Rule 403 – Fugitive Dust.** Requires actions to prevent, reduce or mitigate anthropogenic fugitive dust emissions, including emissions from construction activities.²⁴
- **Rule 442 – Architectural Coating.** Establishes VOC limits for architectural coatings (e.g., paints, stains, preservatives). Building interior and exterior paint is limited to a maximum VOC content of 50 grams per liter for flat coatings and 100 grams per liter for non-flat coatings.²⁵
- **Rule 448 – Gasoline Transfer into Stationary Storage Containers.** Limits emissions resulting from the transfer of gasoline into any stationary storage container by requiring implementation of CARB certified Phase I vapor recovery systems.²⁶
- **Rule 449 – Transfer of Gasoline in vehicle Fuel Tanks.** Limits emissions resulting from the transfer of gasoline into vehicle fuel tanks by requiring implementation of CARB certified Phase II vapor recovery systems.²⁷

²¹ Ibid. (pg. 24)

²² Ibid. (pg. 24)

²³ Ibid. (pg. 24)

²⁴ Ibid. (pg. 24)

²⁵ Ibid. (pg. 24)

²⁶ Ibid. (pg. 24)

²⁷ Ibid. (pg. 24)

Best Management Practices

To allow the use of non-zero PM₁₀ and PM_{2.5} thresholds of significance, SMAQMD recommends lead agencies require implementation of the following Basic Construction Emission Control Practices (BCECPs) and operational Best Management Practices (BMPs) for all land use development projects.²⁸

Basic Construction Emission Control Practices

- Water all exposed surfaces two times daily. Exposed surfaces include, but are not limited to, soil piles, graded areas, unpaved parking areas, staging areas, and access roads;
- Cover or maintain at least two feet of free board space on haul trucks transporting soil, sand, or other loose material on the site. Any haul trucks that would be traveling along freeways or major roadways should be covered;
- Use wet power vacuum street sweepers to remove any visible trackout mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited;
- Limit vehicle speeds on unpaved roads to 15 miles per hour (mph);
- All roadways, driveways, sidewalks, and parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used;
- Minimize idling time by either shutting equipment off when not in use or reducing time of idling to 5 minutes. Provide clear signage that posts this requirement for workers at the entrances to the site; and
- Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determined to be running in proper condition before it is operated.

Operational Best Management Practices

1. Compliance with SMAQMD rules that control operational PM and NOx emissions.
2. Compliance with mandatory measures in the California Building Energy Efficiency Standards (Title 24, Part 6) that pertain to efficient use of energy at a residential or non-residential land use.
3. Compliance with mandatory measures in the California Green Building Code (Title 24, Part 11).
4. Compliance with anti-idling regulations for diesel-powered commercial motor vehicles (greater than 10,000 gross vehicular weight rating).

²⁸ Ibid. (pg. 25)

SACRAMENTO COUNTY GENERAL PLAN

The Sacramento County General Plan Air Quality Element contains the following policies relevant to the project:²⁹

- **AQ-1:** New development shall be designed to promote pedestrian/bicycle access and circulation to encourage community residents to use alternative modes of transportation to conserve air quality and minimize direct and indirect emission of air contaminants.
- **AQ-3:** Buffers and/or other appropriate exposure reduction measures shall be established on a project-by project basis and incorporated during review to provide for protection of sensitive receptors from sources of air pollution or odor. The California Air Resources Board's "Strategies to Reduce Air Pollution Exposure Near High Volume Roadways" Technical Advisory and the SMAQMD's "Mobile Sources Air Toxics Protocol" or County of Sacramento General Plan 2 Air Quality Element Amended December 16, 2020 applicable AQMD guidance shall be utilized when establishing these exposure reduction measures.
- **AQ-4:** Developments which meet or exceed thresholds of significance for ozone precursor pollutants, and/or GHG as adopted by the SMAQMD, shall be deemed to have a significant environmental impact. An Air Quality Mitigation Plan and/or a Greenhouse Gas Reduction Plan shall be submitted to the County of Sacramento prior to project approval, subject to review and recommendation as to technical adequacy by the Sacramento Metropolitan Air Quality Management District.
- **AQ-16:** Prohibit the idling of on-and off-road engines when the vehicle is not moving or when the off-road equipment is not performing work for a period of time greater than five minutes in any one-hour period.
- **AQ-20:** Promote Cool Community strategies to cool the urban heat island, reduce energy use and ozone formation, and maximize air quality benefits by encouraging four main strategies including, but not limited to: plant trees, selective use of vegetation for landscaping, install cool roofing, and install cool pavements.

RIO LINDA AND ELVERTA COMMUNITY PLAN

The project is in the Rio Linda and Elverta Community Plan area. The Rio Linda and Elverta Community Policy Plan, adopted by the County Board of Supervisors in 1998, contains the Policy NR-18 concerning air quality as follows:³⁰

- **NR-18:** Implement the following Environmental Impact Report (EIR) [Rio Linda and Elverta Community Plan EIR, 1998] mitigation measures:
 - **AI-1:** Applicants for future development proposals within the Plan area shall prepare and implement a plan designed to control dust emissions resulting from project activities. At a minimum, the content of this plan shall contain requirements for the following:

²⁹ Ibid. (pg. 26)

³⁰ Ibid. (pg. 26)

- Application of dust palliatives (e.g., water) at least twice daily (at the beginning and end of daily construction activities) and more often as necessary; and
 - Watering the construction area or applying some other palliatives whenever visible dust clouds appear; and
 - Ceasing grading activities whenever sustained winds exceed 25 miles per hour.
- **AI-2:** To reduce construction-related ROG and NOx impacts to a less than significant level, all construction vehicles and equipment shall be maintained according to manufacturers' specifications. Construction contractors shall be required to show written evidence of appropriate maintenance prior to bringing equipment on site.
 - **AI-3:** Applicants for future development proposals within the Plan area shall include educational materials regarding air quality in homeowners/renters packages for all residential occupants. Information contained in these packages shall, at a minimum, provide information regarding transportation-related amenities at the project site, including ridesharing and mass transit availability and schedules. The applicant should also provide maps showing pedestrian and bicycle paths to community centers, shopping areas, recreational areas, and schools.
 - **AR-4:** All wood-burning devices in proposed project residences shall be EPA-certified devices.

IMPACT DISCUSSION

- a. *Would the project conflict with or obstruct implementation of the applicable air quality plan?*

Less than Significant with Mitigation. In accordance with SMAQMD's CEQA Guide, construction-generated NOx, PM₁₀, and PM_{2.5}, and operational-generated ROG and NOx (ozone precursors) are used to determine consistency with the Regional Ozone Plan. The Guide states:³¹

By exceeding the District's mass emission thresholds for operational emissions of ROG NOx, PM₁₀, or PM_{2.5}, the project would be considered to conflict with or obstruct implementation of the District's air quality planning efforts.

As described in response b), below, the project's construction-related NOx, PM₁₀, and PM_{2.5} and operational ROG and NOx emissions would not exceed SMAQMD thresholds. Mitigation consistent with the SMAQMD Basic Construction Emissions Control Practices have been included as Mitigation Measure AQ-1 to address PM₁₀ and PM_{2.5} emissions. Therefore, the project would not conflict with and obstruct implementation of SMAQMD's Regional Ozone Plan. This impact would be less than significant with mitigation incorporated.

- b. *Would the project result in 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?*

Less than Significant with Mitigation. The project would generate criteria pollutants and precursors in the short-term during construction and the long-term during operation. Emissions

³¹ Ibid. (pg. 54)

were estimated using CalEEMod, Version 2022.1, and compared against SMAQMD CEQA thresholds of significance to determine whether the project would result in cumulatively considerable emissions that would violate an air quality standard or contribute substantially to an existing or projected air quality violation.

Construction Emissions

Construction emissions would be generated by off-road equipment (e.g., bulldozers, tractor/loader/backhoes, etc.), on-road vehicle trips (e.g., worker, vendor, and haul trips), and architectural coating activities. Construction activities would include minor demolition of a concrete pad and several small outbuildings, site preparation, grading, building construction, paving, and architectural coatings. The site preparation, grading, underground utilities, paving, and architectural coating activities would include off-site work in the Marysville Boulevard, West Elkhorn Boulevard, and West 4th Street right of ways along the project frontage. Construction is assumed to occur five days per week with equipment operating up to eight hours per day. Paving and architectural coatings are anticipated to occur concurrently with building construction.

The results of the project construction modeling are shown in Table IS-2, *Maximum Daily Construction Emissions*. Maximum daily emissions are presented for comparison, consistent with the SMAQMD thresholds. The modeling assumes implementation of the fugitive dust control measures, specifically watering demolition areas and exposed surfaces twice daily (see SMAQMD Basic Construction Emission Control Measures in the Regulatory Setting).

Table IS-2: Maximum Daily Construction Emissions

Activity	Max Daily Emissions (lbs/day)					
	ROG	NOx	CO	SOx	PM ₁₀	PM _{2.5}
Demolition – Winter 2026	2.7	24.0	22.5	<0.1	1.9	1.0
Site Preparation – Winter 2026	3.6	32.9	32.5	<0.1	9.4	5.3
Grading – Winter 2026	2.1	19.2	21.2	<0.1	4.0	2.1
Underground Utilities – Summer 2026	0.7	4.6	6.7	<0.1	0.3	0.2
Building Construction – Summer 2026	1.1	10.0	13.3	<0.1	0.5	0.4
Building Construction and Paving – Winter 2026	2.5	23.6	26.2	<0.1	1.9	1.0
Building Construction and Architectural Coating – Winter 2026	16.7	10.9	14.4	<0.1	0.5	0.4
Maximum Daily Emissions	16.7	32.9	32.5	<0.1	9.4	5.3
<i>SMAQMD Threshold</i>	<i>None</i>	<i>85</i>	<i>None</i>	<i>None</i>	<i>80^a</i>	<i>82^a</i>
Threshold Exceeded?	No	No	No	No	No	No
Notes: a. SMAQMD PM thresholds are zero unless all feasible Best Available Control Practices/Best Management Practices are applied. <i>lbs/day = pounds per day; ROG = reactive organic gas; NOx = nitrogen oxides; CO = carbon monoxide; SOx = sulfur oxides; PM₁₀ = particulate matter 10 microns or less in diameter; PM_{2.5} = particulate matter 2.5 microns or less in diameter</i> Source: Helix, 2025; Table 16 (pg. 55)						

As shown in Table IS-2, criteria air pollutants (and precursors) would not exceed the SMAQMD significance thresholds. However, the SMAQMD considers any increase in construction PM emissions to be potentially significant unless the SMAQMD construction BCECPs are implemented. The SMAQMD recommends lead agencies should add these emission control practices as Conditions of Approval (COA) or include them as a mitigation measure.³² Implementation of Mitigation Measure AQ-1 would require compliance with, and application of, the SMAQMD's recommended BCECPs.

Mitigation Measure AQ-1 identifies control measures that would reduce fugitive dust emissions from on-site earth moving activities and potential trackout of dirt / off-site emission sources.

Operational Emissions

Once operational, the proposed project would generate criteria air pollutants and precursor emissions from area, energy, and transportation sources, as well as fugitive ROG emissions from loading, unloading, and storing gasoline at the site. Whereas CalEEMod was used to estimate emissions from area, energy, and transportation sources, fugitive ROG emissions from gas station activities were estimated using emission factors contained in CARB's *Revised Emission Factors for Gasoline Marketing Operations at California Gasoline Dispensing Facilities* and an annual throughput estimate of 12 million gallons.³³ The results of the project operational modeling are shown in Table IS-3Table IS-3, *Maximum Daily Operational Emissions*.

As shown in Table IS-3Table IS-3, long-term criteria air pollutants and precursor emissions would not exceed the SMAQMD thresholds; however, similar to construction emissions, SMAQMD considers any increase in PM emissions to be significant unless SMAQMD operational BMPs are implemented. Therefore, consistent with SMAQMD operational BMP 4, Mitigation Measure AQ-2 would reduce operational emissions. Mitigation Measure AQ-2 would require the applicant to install signage at project commercial entrances informing the public and all commercial vehicles of the State diesel-powered commercial vehicle idling regulations and phone numbers to be called in the event of noncompliance, helping enforcement actions related to these potential sources of emissions.

Conclusion

As shown in Table IS-2 and Table IS-3, the project's construction and operational emissions would be below SMAQMD thresholds; however, the SMAQMD considers any increase in construction or operational PM emissions to be significant unless the construction BCECPs and operational BMPs are implemented. Accordingly, implementation of Mitigation Measures AQ-1 and AQ-2 would be required to reduce construction PM emissions and operational idling emissions, consistent with SMAQMD guidance. With the implementation of Mitigation Measures AQ-1 and AQ-2, the project would not result in a cumulatively considerable net increase of any criteria pollutant for which the Sacramento Region is designated as being in non-attainment. This impact would be less than significant with mitigation incorporated.

³² Ibid. (pg. 56)

³³ Ibid. (pg. 46).

Table IS-3: Maximum Daily Operational Emissions

Source	Max Daily Emissions (lbs/day)					
	ROG	NOx	CO	SOx	PM ₁₀	PM _{2.5}
Mobile	12.7	14.5	127.4	0.3	25.4	6.6
Area	0.5	<0.1	0.7	<0.1	<0.1	<0.1
Energy	0.0	0.0	0.0	0.0	0.0	0.0
Gas Station Gasoline Vapor	13.2	-	-	-	-	-
Total Daily Emissions^{a,b}	28.6	14.5	128.1	0.3	25.4	6.6
<i>SMAQMD Threshold</i>	65	65	None	None	80 ^c	82 ^c
Threshold Exceeded?	No	No	No	No	No	No
Notes: a. Totals may not sum due to rounding. b. Maximum daily emissions form NOx occur during winter, maximum daily emissions of all other pollutants occur during summer or are not seasonally dependent. c. SMAQMD PM thresholds are zero unless all feasible Best Available Control Practices/Best Management Practices are applied. lbs/day = pounds per day; ROG = reactive organic gas; NOx = nitrogen oxides; CO = carbon monoxide; SOx = sulfur oxides; PM₁₀ = particulate matter 10 microns or less in diameter; PM_{2.5} = particulate matter 2.5 microns or less in diameter Source: Helix, 2025; Table 17 (pg. 56)						

Cumulative Emissions

A cumulative impact analysis considers a project in conjunction with other past, present, and reasonably foreseeable future projects whose impacts might compound those of the project being assessed. Due to the dispersive nature and regional sourcing of air pollutants, air pollution is already largely a cumulative impact. The non-attainment status of regional pollutants, including ozone and PM, is a result of past and present development, and, thus, cumulative impacts related to these pollutants could be considered cumulatively significant.

As discussed above, the proposed project would result in construction and operational emissions below all applicable SMAQMD thresholds of significance. Another, nearby gas station project, the *West Elkhorn Gas Station C-Store, & Fast-Food Restaurant Project*, at the southwest corner of Marysville Boulevard and West Elkhorn Boulevard, would also result in construction and operational emissions. The combined emissions from both of these gas station projects would still be lower than the SMAQMD thresholds of significance. Therefore, the proposed project, in combination with the project to the south, would not be considered to contribute a cumulatively considerable net increase of non-attainment criteria pollutants to the existing, cumulative air quality impact. Therefore, a less-than-significant impact would result.

- c. *Would the project expose sensitive receptors to substantial pollutant concentrations?*

Less than Significant. Project construction and operation would emit TAC emissions; however, as described in this response, these emissions would not have the potential to expose sensitive receptors to substantial pollutant concentrations.

Construction Emissions

Construction of the project would result in the use of heavy-duty construction equipment, haul trucks, portable generators, and construction worker vehicles, which would generate DPM. DPM from construction projects typically occurs in a localized area (e.g., at the project site) for a short period of time. Because construction activities and subsequent emissions vary depending on the phase of construction (e.g., grading, building construction), the construction-related emissions to which nearby receptors are exposed to would also vary throughout the construction period. During some equipment-intensive phases such as grading, construction-related emissions would be higher than other less-equipment-intensive phases such as building construction. DPM disperses rapidly and concentrations of mobile-source DPM emissions are typically reduced by 70 percent at approximately 500 feet.³⁴

The dose (of TAC) to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance in the environment and the extent of exposure a person has with the substance; a longer exposure period to a fixed quantity of emissions would result in higher health risks. Current models and methodologies for conducting cancer health risk assessments are associated with longer-term exposure periods (typically 30 years for individual residents based on guidance from OEHHHA) and are best suited for evaluation of long duration TAC emissions with predictable schedules and locations. These assessment models and methodologies do not correlate well with the temporary and highly variable nature of construction activities. Cancer potency factors are based on animal lifetime studies or worker studies where there is long-term exposure to the carcinogenic agent. There is considerable uncertainty in trying to evaluate the cancer risk from projects that will only last a small fraction of a lifetime.³⁵ Considering this information, the highly dispersive nature of DPM, the distance to the nearest permanent sensitive receptor location (a residence approximately 90 feet east of the project site, the short duration of construction activities (approximately 11 months) and the fact that construction activities would occur at various locations throughout the project site for short periods, construction of the project would not expose sensitive receptors to substantial DPM concentrations.

Operational Emissions

Localized Criteria Air Pollutants

Per the SMAQMD CEQA Guide, land use development projects do not typically have the potential to result in localized concentrations of criteria air pollutants that expose sensitive receptors to substantial pollutant concentrations. This is due to criteria air pollutants being predominantly generated in the form of mobile-source exhaust from vehicle trips associated with the land use development project. These vehicle trips occur throughout a paved network of roads, and, therefore, associated exhaust emissions of criteria air pollutants are not generated in a single location where high concentrations could be formed.³⁶ The guidance goes on to state that, "...there may be unique situations where a project with high levels of emissions may require concentration modeling to determine if the emissions would expose sensitive receptors to substantial pollutant concentrations. A substantial pollutant

³⁴ Ibid. (pg. 58)

³⁵ Ibid. (pgs. 58 and 59)

³⁶ Ibid. (pg. 59)

concentration occurs when the project emissions alone would cause an exceedance of the AAQS. Projects that exceed the AAQS are considered to have a significant impact.”³⁷

As shown in Table IS-3, the project’s operational emissions would be below all operational air quality CEQA thresholds of significance maintained by SMAQMD. SMAQMD thresholds do not identify a quantitative, mass-based emissions threshold for CO, and the project would emit approximately 128 lbs of CO per day upon commencing operation; however, as discussed in Section IX, Greenhouse Gas Emissions, and Section XVIII, Transportation, the project is anticipated to be a local serving use, and most of the vehicle trips to the site for fuel dispensing would be existing trips that are either pass-by trips or diverted trips. This means that most of the trips associated with the project are already occurring. The project would not introduce new trips in substantial enough quantities such that a CO hotspot would occur. Therefore, long-term operation of the project would not expose sensitive receptors to substantial localized concentrations of criteria pollutants, including CO.

Toxic Air Contaminants

Implementation of the project would result in TAC emissions from gasoline vapor associated with the gasoline station operations. As described in Appendix A, a Health Risk Assessment (HRA) was completed to assess potential risks associated with off-site receptor exposure to these emissions. Project risks were then compared to SMAQMD Thresholds of Significance of 10 excess cancer risk per million population for cancer risk and hazard index of 1.0 for chronic and acute non-cancer hazards. Projects exceeding these cancer and non-cancer thresholds would have a potentially significant impact requiring mitigation.

Gas station TACs were estimated for five emission sources – loading, breathing, refueling, spillage, and dispenser permeation – consistent with CARB’s *Gasoline Service Station Industrywide Risk Assessment Technical Guidance* and modeled using US EPA AERMOD to assess concentration values at nearby receptor locations.³⁸ Adverse health effects resulting from localized concentrations of TACs were calculated using CARB’s Hotspots Analysis and Reporting Program (HARP), Air Dispersion Modeling and Risk Tool (ADMRT) version 22118.

The maximum estimated incremental community health risk due to exposure to the project’s TAC emissions from long-term operation of the proposed retail gas station for the Maximally Exposed Individual Resident (MEIR; modeled receptor R4 for cancer and non-cancer chronic health risks, modeled receptor R6 for acute health risks, see Figure 4 in Appendix A) are presented in Table IS-4, *Maximum Incremental Health Risk from Fugitive Gasoline TACs*.

As shown in Table IS-4, the incremental increased cancer risk at the MEIR would not exceed the SMAQMD threshold of 10 in 1 million, nor would the chronic or acute hazard indices exceed the SMAQMD threshold of 1. Therefore, the proposed retail gasoline dispensing facility would not exceed the SMAQMD thresholds at the maximum proposed permitted throughput of 12 million gallons per year, and long-term operation of the proposed gas station would not expose of sensitive receptors to substantial TAC concentrations.

³⁷ Sacramento Metropolitan Air Quality Management District (SMAQMD), 2020. “Chapter 4: Operational Criteria Air Pollutant and Precursor Emissions.” Sacramento County CEQA Guide. Available: www.airquality.org/LandUseTransportation/Documents/Ch4OperationalFinal10-2020.pdf. Accessed September 22, 2025.

³⁸ Helix Environmental Planning, 2025 (pg. 45 and 46). West Elkhorn ARCO ampm/Commercial Project Air Quality and Greenhouse Gas Emissions Technical Report. March 2025.

Table IS-4: Maximum Incremental Health Risk from Fugitive Gasoline TACs

Metric	MEIR Cancer Risk (chances per million)	MEIR Non-Cancer Chronic Hazard Index	MEIR Acute Hazard Index
Results of Gasoline TAC Analysis	2.7	0.01	0.6
<i>Threshold</i>	<i>10</i>	<i>1</i>	<i>1</i>
<i>Threshold Exceeded?</i>	<i>No</i>	<i>No</i>	<i>No</i>
<i>Source: Helix, 2025; Table 18 (pg. 60)</i>			
<i>Note: MEIR = Maximally Exposed Individual Resident</i>			

The Westside Elementary school, located approximately 350 feet (0.07 mile) to the northeast of the project site, would be lower than the risk values presented in Table IS-4 and similarly not exceed SMAQMD thresholds. Students at Westside Elementary School are further away from the site than the MEIR, and would have less exposure to the project's operational TAC emissions (eight hours per day for up to seven years) compared to residents (17 to 21 hours per day for 30 years). However, because the project would be within 1,000 feet of a school with 12 or more students, a public notification (by SMAQMD) of the proposed retail gasoline dispensing facility may be triggered as part of the permitting process in accordance with Assembly Bill (AB) 2185 and Health and Safety Code Section 25500, also known as a "Waters Bill Notification."

Conclusion

The proposed project would not result in construction or operational emissions that exceed SMAQMD thresholds; therefore, the project would not expose sensitive receptors to substantial pollutant concentrations, and this impact would be less than significant.

- d. *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

Less than Significant. Odors associated with diesel exhaust and ROG from asphalt and architectural coating applications would be emitted during project construction. These odors may be objectionable to some; however, emissions would disperse rapidly from the project site and therefore would not be at a high enough concentration that they would affect a substantial number of people. Further, construction activities would be temporary. As a result, impacts associated with temporary odors during construction would be less than significant.

According to SMAQMD, land uses that typically generate significant odor impacts include wastewater treatment plants, sanitary landfills, composting/green waste facilities, recycling facilities, petroleum refineries, chemical manufacturing plants, painting/coating operations, rendering plants, and food packaging plants.³⁹ The project would not include any of these land uses. The project includes a gasoline/diesel station, which can be a source of gasoline vapor odors. However, the gas station would be required by SMAQMD and CARB regulations to install and maintain gasoline vapor control systems that would also control odors from gasoline vapors. In addition, gas stations are not listed by SMAQMD as land uses that typically have the potential to cause odor impacts. Therefore, the project would not result in

³⁹ Ibid. (pg. 61)

other emissions (such as those leading to odors) adversely affecting a substantial number of people. This impact would be less than significant.

ENVIRONMENTAL MITIGATION MEASURES

MITIGATION MEASURE AQ-1: BASIC CONSTRUCTION EMISSIONS CONTROL PRACTICES

The County shall require the implementation of the following Basic Construction Emissions Control Practices to control fugitive dust from the construction site. Control of fugitive dust is required by SMAQMD Rule 403 and enforced by SMAQMD staff. Prior to issuing grading or construction permits the County shall verify the following measures are specified on construction contracts and/or construction documentation.

- Water all exposed surfaces two times daily. Exposed surfaces include, but are not limited to soil piles, graded areas, unpaved parking areas, staging areas, and access roads.
- Cover or maintain at least two feet of free board space on haul trucks transporting soil, sand, or other loose material on the site. Any haul trucks that would be traveling along freeways or major roadways should be covered.
- Use wet power vacuum street sweepers to remove any visible trackout mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited.
- Limit vehicle speeds on unpaved roads to 15 mph.
- All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.
- Minimize idling time by either shutting equipment off when not in use or reducing time of idling to 5 minutes. Provide clear signage that posts this requirement for workers at the entrances to the site; and
- Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determined to be running in proper condition before it is operated.

MITIGATION MEASURE AQ-2: COMMERCIAL VEHICLE IDLING

Prior to issuing occupancy permits for any of the project's commercial buildings, the County shall verify that commercial vehicle idling signs are installed at all project driveways where commercial vehicles may enter the project site. The signs shall be easily readable by a driver from the cab of a truck entering the site. The signs shall include the following information:

- Diesel-powered commercial motor vehicle with more than 10,000 lbs gross vehicular weight rating shall not idling on the project site for more than 5 minutes per Title 13, CCR, section 2485; and
- Report an idling violation to the California Air Resources Board by calling 1-800-END-SMOG (1-800-363-7664); and
- Report an idling violation to project property management or owner operator.

V. BIOLOGICAL RESOURCES

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Have a substantially 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 the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c. 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?	☐	☒	☐	☐
d. 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?	☐	☐	☒	☐
e. Adversely affect or result in the removal of native or landmark trees?	☐	☐	☒	☐
f. Conflict with any local policies or ordinances protecting biological resources?	☐	☐	☒	☐
g. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

ENVIRONMENTAL SETTING

The approximately 4.14-acre (180,358 square foot) project site, consisting of two parcels, is located in northern Sacramento County at the northwest corner of Marysville Boulevard and West Elkhorn Boulevard. The project site currently contains an approximately 4,250-square-foot concrete pad located near the center of the site and three structures previously used for stables and storage located at the northwest corner of the project site. The remainder of the site consists of undeveloped land covered with native grasses, which was previously used for a horse pasture, as well as six aquatic features totaling approximately 0.251 acre (**Plate IS-5**). The site is situated within the Great Central Valley Bioregion as defined by the U.S. Geological Survey. This bioregion is characterized by a Mediterranean climate with hot, dry summers and cool, wet winters. The Great Central Valley Bioregion is an expansive lowland area bordered by

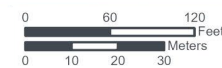


- Project Area (4.14 ac)
- Offsite/ROW Improvements (1.76 ac)
- Existing Well Site (Not part of project)
- C Culvert*

Biological Community / Resource

- Non-native grassland
- Developed (DEV)
- Barren/ Disturbed
- Seasonal Wetland (SW)
- Wetland Swale (WS)

* Culvert locations approximated based on desktop analysis.



SOURCE: SWCA, 2024

Plate IS-5
Land Cover Map

the Coast Ranges to the west and the Sierra Nevada foothills to the east. It historically supported large expanses of grassland, riparian woodland, and seasonal wetlands, although much of the landscape has been modified for agricultural and urban development.

Locally, the project site lies within the Lower Sacramento River watershed, a major component of the Sacramento River system that drains into the Sacramento San Joaquin Delta. The project site is agricultural-residential in nature, and the area surrounding the project site is similarly agricultural-residential, with a mix of commercial and residential development. Open space is limited in the immediate vicinity, and remaining undeveloped areas typically support ruderal vegetation and disturbed habitat conditions with low biological value. Hydrologic features in the vicinity are largely associated with engineered drainage systems, including the Natomas East Main Drainage Canal located approximately 0.4 mile to the west of the site. There are no trees on the project site, with the exception of a few shrubs and one (1) small non-native tree located at the southeast corner of the site adjacent to the intersection.

VEGETATION COMMUNITIES AND ASSOCIATED WILDLIFE SPECIES

According to the classification system developed by Holland (1986), the project site does not support any natural terrestrial vegetation communities of California. The Biological Resources Evaluation prepared by SWCA Environmental Consultants (April 2025) for the ARCO NWC Marysville and Elkhorn Project characterized the approximately 4.14-acre site containing a mix of disturbed and agricultural land cover types that have been substantially modified by past and ongoing human use. Existing features include a concrete pad located near the center of the site and three structures in the northwest corner that were previously used as stables and for storage, which are largely unvegetated and provide little habitat value for native plants or wildlife. The remainder of the site consists of undeveloped land historically used as a horse pasture, which has been subject to intensive grazing and is dominated by nonnative grasses. Vegetation in this area is generally sparse and patchy, with compacted or bare soils resulting from repeated livestock use. Collectively, the concrete pad, stable structures, grazed pasture, paved yard, and horse pens represent ruderal and modified agricultural habitats common in the surrounding Rio Linda/Elverta Community Plan Area, which is characterized by residential, agricultural, and vacant land uses. The combination of prior disturbance, limited vegetation diversity, and the surrounding developed/agricultural context further reduces the site's overall habitat quality.

Wildlife species expected to occur are those adapted to disturbed and semi-urban environments. Common avian species likely to use the site for foraging, perching, or nesting include mourning dove (*Zenaidura macroura*), northern mockingbird (*Mimus polyglottos*), California scrub-jay (*Aphelocoma californica*), house finch (*Haemorrhous mexicanus*), and black phoebe (*Sayornis nigricans*). Ground-foraging species such as California ground squirrel (*Otospermophilus beecheyi*) and western fence lizard (*Sceloporus occidentalis*) may occur in open areas, while mammals such as raccoon (*Procyon lotor*) and Virginia opossum (*Didelphis virginiana*) may use the site opportunistically, particularly during evening or early morning hours.

Per the Biological Resources Evaluation prepared by SWCA Environmental Consultants (April 2025) and Preliminary Jurisdictional Delineation Report for the ARCO NWC Marysville and Elkhorn Project (SWCA, April 2025), a total of six wetland features were identified on the property, including five shallow seasonal wetlands and one linear wetland swale, totaling approximately 0.251 acre (10,933.56 square feet) (refer to Figure 4, Delineation Results Map, from the Preliminary Jurisdictional Delineation Report [**Appendix D**]). The seasonal wetlands form in depressions where rainfall accumulates during the winter and spring, resulting in

saturated soils and supporting hydrophytic vegetation such as foxtail barley (*Hordeum murinum*), curly dock (*Rumex crispus*), and perennial ryegrass (*Festuca perennis*). Although small and isolated, these features provide seasonal habitat functions during wetter months. The wetland swale occurs along the western boundary of the site, originating from a culvert between the Rio Linda/Elverta Community Water District groundwater well #9 and horse corrals. Unlike the isolated seasonal wetlands, the swale likely maintains a hydrologic connection to downstream waters, making it more likely to fall under federal and state jurisdiction. Together, these features represent the only wetland resources on-site within an otherwise disturbed landscape. All six of the seasonal wetlands showed evidence of regular disturbance from mowing and grazing activities.

SPECIAL-STATUS SPECIES

The phrase “special-status species” is used by the scientific community to describe plant and wildlife species that are considered sufficiently rare that they require special consideration and/or protection and should be, or have been, listed as rare, threatened or endangered by federal and/or state governments. Such species are legally protected under federal and/or state Endangered Species Acts, or other regulations, or are species that are considered sufficiently rare by the regulatory and scientific community to qualify for protection. The term special-status species includes the following:

- Species listed or proposed for listing as threatened or endangered under the federal Endangered Species Act (FESA) (50 Code of Federal regulations [CFR] 17.12 [listed plants], 17.11 [listed animals] and various notices in the Federal Register [FR] [proposed species]);
- Species that are candidates for possible future listing as threatened or endangered under the federal Endangered Species Act (61 FR 40, February 28, 1996);
- Species listed or proposed for listing by the State of California as threatened or endangered under the California Endangered Species Act (CESA) (14 California Code of Regulations [CCR] 670.5);
- Plants listed as rare or endangered under the California Native Plant Protection Act (California Fish and Game Code, Section 1900 et seq.);
- Species designated by California Department of Fish and Wildlife (CDFW) as species of special concern;⁴⁰
- Animals fully protected under California Fish and Game Code (California Fish and Game Code, Sections 3511 [birds], 4700 [mammals], and 5050 [reptiles and amphibians])⁴¹;

⁴⁰ A California species of special concern is one that has been extirpated from the state; meets the state definition of threatened or endangered but has not been formally listed; is undergoing or has experienced serious population declines or range restrictions that put it at risk of becoming threatened or endangered; and/or has naturally small populations susceptible to high risk from any factor that could lead to declines that would qualify it for threatened or endangered status.

⁴¹ The “fully protected” classification was California’s initial effort in the 1960s to identify and provide additional protection to those animals that were rare or faced possible extinction. The designation can be found in the Fish and Game Code.

- Species that meet the definitions of rare and endangered under CEQA. CEQA Section 15380 provides that a plant or animal species may be treated as “rare or endangered” even if not on one of the official lists (CEQA Guidelines Section 15380); and
- Raptors (birds of prey), which are specifically protected by California Fish and Game Code Section 3503.5, thus prohibiting the take, possession, or killing of raptors and owls, their nests, and their eggs;⁴²
- Plants considered under the CDFW and CNPS to be “rare, threatened or endangered in California” (California Rare Plant Rank [CRPR] 1A, 1B, and 2);

A comprehensive list of special-status species with potential to occur in the vicinity of the project site was compiled using data from the California Natural Diversity Database (CNDDB) and the California Native Plant Society (CNPS) *Inventory of Rare and Endangered Plants of California*. These queries were based on the U.S. Geological Survey 7.5-minute topographic quadrangles for Rio Linda (Quad 3812154) and Sacramento East (Quad 3812155). In addition, the U.S. Fish and Wildlife Service (USFWS) *Information for Planning and Consultation (IPaC)* system was queried using the project site coordinates. The results of these database searches informed the analysis of special-status species with potential to occur in the project area, their general habitat requirements, and their likelihood of presence within the study area.

There is limited suitable habitat for special-status plant or wildlife species within the study area due to the site’s highly disturbed condition, dominance of nonnative grasses, and lack of native vegetation communities and habitat connectivity; however, aquatic features on-site, including a wetland swale and seasonal wetlands, may provide limited habitat for certain species. The study area consists of a concrete pad, three structures previously used as stables and storage, intensively grazed pastureland, and a small, paved storage yard with horse pens that are largely unvegetated. These conditions, along with surrounding residential, agricultural, and vacant land uses, provide limited resources or habitat structure required to support special-status species known from the region. Based on the Biological Resources Evaluation, the study area contains potential suitable foraging habitat for Swainson’s hawk (*Buteo swainsoni*), potential suitable foraging and marginal nesting habitat for burrowing owl (*Athene cunicularia*), and potential suitable nesting habitat for several nesting migratory birds covered under the MBTA (SWCA, April 2025).

CRITICAL HABITAT

The USFWS can designate critical habitat for species that have been listed as threatened or endangered. “Critical habitat” is defined in Section 3(5)(A) of the federal Endangered Species Act (ESA) as those lands (or waters) within a listed species’ current range that contain the physical or biological features that are considered essential to its conservation. The designated habitat should contain elements necessary for the primary biological needs of the species, including breeding, foraging, dispersal, migration, shelter, and growth of juveniles. Critical habitat serves to identify specific areas that are considered essential to the conservation of a

⁴² The inclusion of birds protected by Fish and Game Code Section 3503.5 is in recognition of the fact that these birds are substantially less common in California than most other birds, having lost much of their habitat to development, and that the populations of these species are therefore substantially more vulnerable to further loss of habitat and to interference with nesting and breeding than most other birds. It is noted that a number of raptors and owls are already specifically listed as threatened or endangered by State and federal wildlife authorities.

listed species through special management or protection under Section 7 of the ESA, which requires that federal agencies must not fund, carry out, or authorize projects that would destroy or adversely affect critical habitat.

There is no designated critical habitat for any federally listed species within the study area. The U.S. Fish and Wildlife Service (USFWS) critical habitat mapper shows no critical habitat boundaries intersecting the project site.

SENSITIVE NATURAL COMMUNITIES

Sensitive natural communities are designated by various resource agencies such as CDFW, or in local policies and regulations; are generally considered to have important functions or values for wildlife and/or are recognized as declining in extent or distribution; and are considered threatened enough to warrant some level of protection. CDFW tracks communities of conservation concern through its California Sensitive Natural Community List. Natural communities with ranks of S1 to S3 are considered sensitive natural communities, to be addressed in the environmental review processes of CEQA.

No sensitive natural communities are present within the study area. The site's disturbed conditions do not support native plant species alliances that would qualify as sensitive natural communities.

REGULATORY SETTING

FEDERAL

The Federal Endangered Species Act, Migratory Bird Treaty Act (MBTA), and Sections 401 and 404 of the Clean Water Act are the primary federal planning, treatment, and review mechanism for biological resources in the study area.

ENDANGERED SPECIES ACT

USFWS and the National Marine Fisheries Service (NMFS) are the designated federal agencies responsible for administering the FESA. The FESA defines species as "endangered" and "threatened" and provides regulatory protection for any species thus designated. FESA Section 9 prohibits the "take" of species listed by USFWS as threatened or endangered. As defined in the FESA, *taking* means "... to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or attempt to engage in such conduct." Recognizing that take cannot always be avoided, FESA Section 10(a) includes provisions for takings that are incidental to, but not the purpose of, otherwise lawful activities.

FESA Section 7(a)(2) requires all federal agencies, including USFWS, to evaluate projects authorized, funded, or carried out by federal agencies with respect to any species proposed for listing or already listed as endangered or threatened and the species' critical habitat, if any is proposed or designated. Federal agencies must undertake programs for the conservation of endangered and threatened species and are prohibited from authorizing, funding, or carrying out any action that would jeopardize a listed species or destroy or modify its "critical habitat."

As defined in the FESA, "individuals, organizations, states, local governments, and other non-federal entities are affected by the designation of critical habitat only if their actions occur on federal lands, require a federal permit, license, or other authorization, or involve federal funding."

MIGRATORY BIRD TREATY ACT

The MBTA is the domestic law that affirms and implements a commitment by the United States to four international conventions (with Canada, Mexico, Japan, and Russia) for the protection of a shared migratory bird resource. Unless and except as permitted by regulations, the MBTA makes it unlawful at any time, by any means, or in any manner to intentionally pursue, hunt, take, capture, or kill migratory birds anywhere in the United States. The law also applies to the intentional disturbance and removal of nests occupied by migratory birds or their eggs during the breeding season.

The study area provides limited potential nesting or foraging habitat for migratory birds due to its disturbed condition; however, any active nests of species protected under the Migratory Bird Treaty Act would be avoided during the breeding season in accordance with applicable regulations.

CLEAN WATER ACT

Under Section 404 of the Clean Water Act (CWA), the USACE has primary federal responsibility for administering regulations that concerns waters of the United States. Section 404 of the CWA regulates the discharge of dredged or fill material into waters of the U.S. Fill material is material placed in waters of the United States where the material has the effect of replacing any portion of a water of the United States with dry land or changing the bottom elevation of any portion of a water of the United States. Waters of the United States include navigable waters of the United States; interstate waters; all other waters where the use, degradation, or destruction of the waters could affect interstate or foreign commerce; tributaries to any of these waters, and wetlands adjacent to these waters. Wetlands are defined as those areas that are inundated or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. The USACE requires that a permit be obtained if a project proposes the placement of structures within, over, or under navigable waters and/or discharging dredged or fill material into waters below the ordinary high-water mark.

Under CWA Section 401, applicants for a federal license or permit to conduct activities that may result in the discharge of a pollutant into waters of the United States must apply for water quality certification from the state. Therefore, all projects with a federal component that may affect state water quality (including projects that require federal agency approval, such as a Section 404 permit) must comply with CWA Section 401. As part of the permitting process under Section 404, applicants would be required to apply for water quality certification from the Central Valley Regional Water Quality Control Board. If a project would result in the discharge of dredged or fill material into waters of the United States, including jurisdictional wetlands or other aquatic features, authorization under Section 404 of the Clean Water Act from the U.S. Army Corps of Engineers and water quality certification under Section 401 from the Central Valley Regional Water Quality Control Board may be required.

STATE

In addition to CEQA, the California Endangered Species Act, California Fish and Wildlife Code Sections 3503, 3503.5, and 3511 and Porter-Colone Water Quality Control Act are the primary state planning, treatment, and review mechanism for biological resources in the study area.

CALIFORNIA ENDANGERED SPECIES ACT

The CESA closely parallels the conditions of the FESA; however, it is administered by CDFW. CESA prohibits the take of plant and animal species that the California Fish and Game Commission has designated as either threatened or endangered in California. “Take” in the context of this regulation means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill a listed species (CFGF section 86). The take prohibitions also apply to candidates for listing under CESA. However, section 2081 of the act allows the department to issue permits for the minor and incidental take of species by an individual or permitted activity listed under the act. Unlike FESA, species that are candidates for state listing are granted the same protections as listed species under CESA.

In accordance with the requirements of CESA, an agency reviewing a project within its jurisdiction must determine whether any state-listed endangered or threatened species could be present in the study areas. The agency also must determine whether the project could have a potentially significant impact on such species. In addition, the department encourages informal consultation on any project that could affect a candidate species.

CALIFORNIA FISH AND GAME CODE SECTIONS 3503, 3503.5, AND 3513

Under these sections of the California Fish and Game Code, the project operator is not allowed to conduct activities that would result in the taking, possessing, or destroying of any birds of prey; the taking or possessing of any migratory nongame bird; the taking, possessing, or needlessly destroying of the nest or eggs of any raptors or nongame birds; or the taking of any nongame bird pursuant to California Fish and Game Code Section 3800. Fish and Game Code Section 3513 adopts the federal Department of the Interior take provisions under the MBTA.

PORTER-COLOGNE WATER QUALITY CONTROL ACT

The Porter-Cologne Water Quality Control Act of 1969 established the State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards (RWQCB). The act authorized the SWRCB and the RWQCBs to provide oversight for water rights and water quality. It uses the National Pollutant Discharge Elimination System (NPDES) to monitor point source discharges into the waters of the State to prevent water quality degradation. The act also protects wetlands surface waters, and groundwater from both point and nonpoint sources of pollution.

CALIFORNIA ENVIRONMENTAL QUALITY ACT SECTIONS 15380(B) AND 15065(A)

Under CEQA Guidelines section 15380(b), a species of animal or plant is “Endangered” when its survival and reproduction in the wild are in immediate jeopardy from one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, disease, or other factors; or “Rare” when either: (1) Although the species is not presently threatened with extinction, the species is existing in such small numbers throughout all or a significant portion of its range that it may become endangered if its environment worsens; or (2) the species is likely to become endangered within the foreseeable future throughout all or a significant portion of its range and may be considered “threatened” as that term is used in the Federal Endangered Species Act.

Under CEQA Guidelines Section 15065, a project's effects on biotic resources are deemed significant if the project would:

- Substantially degrade the quality of the environment;
- Substantially reduce the habitat of a fish or wildlife species;
- Cause a fish or wildlife population to drop below self-sustaining levels;
- Threaten to eliminate a plant or animal community;
- Substantially reduce the number or restrict the range of an endangered, rare, or threatened species; or
- Eliminate important examples of the major periods of California history or prehistory.

LOCAL

CENTRAL VALLEY REGIONAL WATER QUALITY CONTROL BOARD – BASIN PLAN

The project site is within the jurisdiction of the Central Valley Regional Water Quality Control Board (Central Valley Water Board). The Water Quality Control Plan for the Sacramento and San Joaquin River Basins (Basin Plan) “identifies beneficial uses of surface and ground waters, water quality objectives to protect those uses, implementation actions to achieve objectives, and a monitoring and surveillance program to ensure that implementation actions are effective.” Beneficial uses identified in the Basin Plan include municipal and domestic supply, agricultural supply, recreation, warm and cold freshwater habitat, migration of aquatic organisms, and spawning, reproduction, and development of fish and wildlife.⁴³

The Basin Plan establishes both narrative and numeric water quality objectives to protect these beneficial uses and outlines implementation programs for achieving and maintaining compliance. These objectives apply to all discharges to waters of the state, including wetlands, streams, and riparian areas within the Central Valley Region. Because the proposed project may result in temporary or permanent discharges to waters of the state (wetlands or streambeds), adherence to the Basin Plan is necessary to obtain Clean Water Act Section 401 Water Quality Certification. Compliance ensures that project activities are conducted in a manner that protects water quality, sustains designated beneficial uses, and aligns with the Basin Plan’s implementation and monitoring framework.

SACRAMENTO COUNTY GENERAL PLAN (2020–2040)

The Sacramento County General Plan (2020–2040) includes goals and policies that support the conservation of biological resources, wetlands, riparian corridors, and other natural areas while accommodating growth. The Conservation Element promotes preservation of sensitive habitat and encourages avoidance or minimization of environmental impacts through site planning, design, and mitigation. These policies provide a framework for maintaining habitat connectivity and ecological value even in disturbed or infill locations.

⁴³ Central Valley Regional Water Quality Control Board, Water Quality Control Plan for the Sacramento and San Joaquin River Basins (Basin Plan), 2023. Available at https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/. Accessed in August 2025.

The General Plan outlines a policy that requires projects to result in no net loss of wetlands, riparian woodlands, and oak woodlands (Policy CO-58). The General Plan also includes policies to protect mature trees and preserve urban canopy cover. Policy CO-145, for example, requires that the loss of tree canopy be mitigated through on-site replacement or in-lieu contributions to community reforestation programs. These tree protection measures are intended to maintain the ecological functions provided by trees, such as wildlife habitat, climate regulation, and neighborhood character, and to guide development toward avoiding unnecessary removals during design and construction. Incorporating these requirements helps ensure that individual projects remain consistent with countywide resource protection goals.

SACRAMENTO COUNTY TREE PRESERVATION AND PROTECTION ORDINANCE (CHAPTER 19.12)

Sacramento County's Tree Preservation and Protection Ordinance (Chapter 19.12) regulates removal of protected trees, including valley oaks (*Quercus lobata*) and interior live oaks (*Quercus wislizeni*), through permit requirements, discretionary review, and potential mitigation strategies. While the ordinance does not explicitly require "no net loss of tree canopy," the General Plan's Conservation Element (Policy CO-145) supports compensating for removal of non-native tree canopy by creating new equivalent canopy, consistent with the project's goal of maintaining ecological functions and visual context.⁴⁴

IMPACT DISCUSSION

- a. *Would the project have a substantially 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 the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

Less than Significant with Mitigation. The approximately 4.14-acre project site is highly disturbed and currently consists of a concrete pad, three structures previously used as stables and storage, intensively grazed pastureland dominated by nonnative grasses, and a small, paved storage yard with horse pens. These conditions provide minimal habitat value for special-status plant or wildlife species, and no such species are expected to occur on-site. However, the site may provide limited foraging and nesting habitat for common and urban-adapted birds protected under the Migratory Bird Treaty Act (MBTA), California Fish and Game Code, and CESA.

Three special-status bird species have the potential to occur in the study area: burrowing owl (*Athene cunicularia*, CDFW Species of Special Concern, CESA Candidate Species), Swainson's hawk (*Buteo swainsoni*, state-listed Threatened), and white-tailed kite (*Elanus leucurus*, CDFW Fully Protected). While the site provides suitable foraging habitat for these species and marginal nesting habitat for burrowing owl, the highly disturbed nature of the project area (intensively grazed pasture, limited prey base, sparse vegetation, and absence of suitable nesting trees) reduces the likelihood of regular or sustained use. Therefore, the potential for these species to occur is considered low, but their presence cannot be entirely ruled out, which supports the need for avoidance and minimization measures such as preconstruction surveys rather than a conclusion of "no state-listed species."

⁴⁴ Sacramento County. 2011. *2030 General Plan of Sacramento County*. Planning and Environmental Review Department. Retrieved August 28, 2025, Available at <https://planning.saccounty.gov/PlansandProjectsIn-Progress/Pages/General-Plan.aspx>.

Construction Impacts

Construction activities associated with the proposed project would include vegetation removal, grading, building demolition, excavation, and other site-disturbing activities. If these activities occur during the avian nesting season (February 1 through August 31), they could directly or indirectly disturb active nests of birds protected under the MBTA, California Fish and Game Code, and CESA. Potential impacts could include the destruction of eggs or young, abandonment of nests due to construction noise or human activity, and reduction in reproductive success. Given that portions of the site contain open ground, sparse vegetation, and structures that could provide marginal nesting opportunities for common and urban-adapted species, there is potential for birds to establish nests on-site or in nearby vegetation prior to and during construction. Disturbance to these active nests could result in the “take” of protected birds as defined under state and federal law. In the absence of appropriate avoidance or minimization measures, such impacts would be considered significant under CEQA.

Implementation of Mitigation Measures BIO-1, BIO-2, and BIO-3 would reduce construction-related impacts by limiting construction to the non-nesting season when feasible or, if avoiding the nesting season is not feasible, conducting pre-construction surveys for nesting birds and establishing no-disturbance buffers around any active nests until birds have fledged and are able to leave the construction area; and reporting findings to the County prior to initiation of construction. Therefore, potential impacts on nesting birds would be less than significant with mitigation.

Operational Impacts

Operational impacts are the long-term effects of a project once it is built and in use, such as lighting, noise, human activity, vehicle traffic, and stormwater runoff, rather than short-term construction impacts. Operation of the proposed gas station, convenience store, and fast-food restaurants would introduce these activities to an area that is primarily characterized as agricultural-residential and may affect biological resources beyond the initial construction footprint. However, the project site is already highly disturbed and surrounded by residential, agricultural, and vacant lands, and it does not provide habitat connectivity or support sensitive natural communities. While lighting and noise associated with operations may cause minor disturbance to common urban-adapted species, no substantial adverse effects to special-status species or sensitive habitats are anticipated.

- b. *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

No Impact. The project site is highly disturbed and consists of a concrete pad, three structures previously used as stables and storage, intensively grazed pastureland dominated by nonnative grasses, and a small, paved storage yard with horse pens. No riparian habitat or sensitive natural communities are present within the site, and no such habitats would be affected by project construction or operation. Therefore, there would be no impact.

- c. *Would the project 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?*

Less than Significant with Mitigation. The Biological Resources Evaluation (SWCA Environmental Consultants, 2025) identified six wetland features within the project site, consisting of five seasonal wetlands and one linear swale, totaling approximately 0.251 acre (10,933.56 square feet). These wetlands form in shallow depressions and along the western boundary of the site and support hydrophytic vegetation such as foxtail barley and curly dock. The features extend beyond the western boundary of the project site and are demonstrated in the Level 3 Drainage Study prepared for the project (see Appendix F) as receiving drainage flows from the north and east, including flows from within and running through the project site.

During project construction, ground disturbance within the project site will have the potential to add sediment and pollutants to site runoff, which could affect the seasonal wetland swale features to the west of the project site. This impact is addressed in Section XI, *Hydrology and Water Quality*, in the impact “a” discussion. As described in that impact discussion, the project is subject to County and State Water Resources Control Board (SWRCB) regulatory policies and permit conditions, that will require the implementation of best management practices (BMPs) designed to limit sediment and pollutant runoff during construction, all of which will be achieved through project compliance with existing regulations. Therefore, construction of the proposed project will have a less than significant impact to offsite state or federally protected wetlands.

Each of the six features within the project site are likely jurisdictional under the State Water Resources Control Board/Regional Water Quality Control Board, and the swale (WS-1) may also fall under U.S. Army Corps of Engineers jurisdiction as a water of the United States. Additionally, Sacramento County General Plan Policy CO-58 requires projects to result in no net loss of wetlands. Project development would permanently impact these features through grading, filling, and recontouring associated with construction of building pads, parking, and stormwater facilities. Features that extend beyond the western boundary of the project site will no longer receive drainage flows from across and within the project site as the drainage system from the proposed project will collect and divert flows to the County drainage infrastructure in the West Elkhorn Boulevard/2nd Street intersection, where those flows were previously flowing to the features beyond the western site boundary. However, as shown in the Level 3 Drainage Study, the features to the west of the project site also receive flows from drainage features further to the west and overland flows from the land area to the north of the feature. Thus, while the features to the west of the project boundary will not receive drainage flows from the project site, once developed, they will still receive ongoing overland flows from upland areas to the north of those features providing water supply to the hydrophytic vegetation within those features. As a result, permanent adverse impacts to features will be limited to the features within the project site. Such permanent operational impacts are considered potentially significant. Implementation of Mitigation Measure BIO-4 would ensure the project compensates for the permanent loss of wetlands by obtaining all applicable permits from the Army Corps of Engineers, the U.S. Fish and Wildlife Service, the Central Valley Regional Water Quality Control Board, and the California Department of Fish and Wildlife. With implementation of Mitigation Measure BIO-2, acquisition of appropriate regulatory permits and implementation of compensatory mitigation consistent with state and federal requirements, impacts to wetlands would be less than significant with mitigation.

Operational activities are not expected to degrade or interfere with the seasonal wetlands and swale beyond impacts already accounted for in construction. Site design would include stormwater facilities that collect and treat runoff, reducing the potential for operational discharges to affect off-site resources. Compliance with applicable County standards, stormwater regulations, and any conditions of biological permits or mitigation measures would further avoid or minimize indirect effects on nearby habitat features. Therefore, operational impacts to state or federally protected wetland resources would be considered less than significant.

- d. *Would the project 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?*

Less than Significant with Mitigation. The project site is not located within a recognized wildlife corridor, nor does it provide connectivity between higher-quality habitats. The disturbed condition of the pasture and the presence of adjacent residential development limit its value as a movement corridor. While common urban-adapted wildlife species (mourning dove, raccoon, California ground squirrel) may occasionally forage or disperse through the site, the proposed development would not substantially interfere with regional wildlife movement or nursery sites. However, there is potential for nesting birds to utilize the site as discussed above. Mitigation Measure BIO-1 would reduce construction-related impacts by limiting construction to the non-nesting season when feasible or, if avoiding the nesting season is not feasible, conducting pre-construction surveys for nesting birds and establishing no-disturbance buffers around any active nests until birds have fledged and are able to leave the construction area. Therefore, impacts would be less than significant with mitigation.

- e. *Would the project adversely affect or result in the removal of native or landmark trees?*

No Impact. No native, landmark, or heritage trees were documented within the project site during the biological survey. The majority of the site consists of disturbed pasture, bare ground, and small areas of vegetation. Therefore, there would be no impact to native or landmark trees.

- f. *Would the project conflict with any local policies or ordinances protecting biological resources?*

Less than Significant. The project would be required to comply with the Sacramento County General Plan and Tree Preservation Ordinance, which regulate sensitive habitats and protected trees. As discussed, no sensitive natural communities, native, or landmark trees are present on site, but the project would require coordination with regulatory agencies regarding impacts to seasonal wetlands and the wetland swale to ensure no net loss of wetlands consistent with the Sacramento County General Plan CO-58 and State and Federal regulations. Sacramento General Plan Policy CO-145 requires the replacement of non-native tree canopy. Two non-native ornamental trees would be removed during construction; however, canopy would be replaced by landscaping plantings that would compensate for tree removals. With adherence to permitting requirements and County policies, the project would not conflict with local biological resource protection ordinances.

- g. *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

No Impact. The project site is located in the Rio Linda/Elverta community of northern Sacramento County, outside of a Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP). No other adopted habitat conservation plans apply to this area. Therefore, the project would not conflict with an HCP, NCCP, or similar conservation plan.

ENVIRONMENTAL MITIGATION MEASURES

MITIGATION MEASURE BIO-1: PRECONSTRUCTION NEST SURVEYS AND AVOIDANCE BUFFERS

Adequate measures shall be taken to avoid inadvertent take of raptor nests, burrowing owls, and other nesting birds protected under the Migratory Bird Treaty Act (MBTA), the California Fish and Game Code, and the California Endangered Species Act (CESA) when in active use. The following steps shall be implemented to ensure full compliance:

- a. If ground disturbance or vegetation removal is proposed during the nesting season (February 1 through August 31, inclusive), a qualified biologist shall conduct preconstruction surveys for active nests and burrowing owl burrows within 7 days prior to the onset of construction or site preparation. Surveys shall encompass the project site, staging areas, and adjacent suitable habitat within 150 feet for songbirds, 250 feet for raptors, and 500 feet for burrowing owl.
- b. If no active nests or occupied burrows are identified, construction may proceed with no restrictions. If work commences outside the nesting season (September 1 through January 31), no survey is required.
- c. If active nests or occupied burrows are detected, the qualified biologist shall establish no-disturbance buffers around each location. Buffer distances shall be determined based on species, line of sight, and activity type, but generally will be 50–150 feet for songbirds, 250 feet for raptors, and 160–250 feet for burrowing owl, consistent with CDFW recommendations. Construction activities within these areas shall be restricted until the biologist verifies that the birds have fledged or the owls have left the site voluntarily.
- d. If birds or owls begin nesting during construction, they shall be presumed habituated to existing levels of activity, and work may continue without disturbance unless direct evidence of nest abandonment or distress is observed. Should such behavior occur, temporary work stoppage and establishment of a no-disturbance buffer shall be implemented as directed by the qualified biologist.
- e. Any work required within an established buffer shall be monitored by the biologist. If nest or burrow disturbance is observed, work shall cease immediately and not resume until the individuals have fledged or vacated.
- f. A report of findings shall be prepared by the qualified biologist and submitted to the Sacramento County Environmental Review Division prior to initiation of construction within a designated no-disturbance buffer. The report shall document survey results, confirm compliance with mitigation requirements, and include verification that any previously active nests or burrows are no longer occupied.

MITIGATION MEASURE BIO-2: WORKER ENVIRONMENTAL AWARENESS PROGRAM TRAINING

Prior to construction, all contractors, operators, and site personnel shall attend a Worker Environmental Awareness Program (WEAP) training conducted by a qualified biologist. The training shall include identification of sensitive species potentially occurring in the region (e.g., burrowing owl, Swainson's hawk, white-tailed kite), applicable state and federal regulations, avoidance measures, and reporting procedures for wildlife encounters. Documentation of attendance and training materials shall be maintained on site and provided to the County upon request.

MITIGATION MEASURE BIO-3: BIOLOGICAL MONITORING

If sensitive species or active MBTA nests/burrows are discovered within the project footprint or applicable survey buffers following implementation of MM BIO-1, a qualified biologist shall be present during initial grubbing, grading, or excavation to ensure that avoidance buffers and protective fencing are maintained and that no special-status species or active nests are disturbed. If wildlife is encountered within the work area, the biologist shall have authority to temporarily halt activities until the individual leaves the area voluntarily or it can be safely relocated with CDFW approval.

MITIGATION MEASURE BIO-4: WETLAND COMPENSATION

To compensate for the permanent loss of wetlands, the applicant shall perform one or a combination of the following prior to issuance of building permits, and shall also obtain all applicable permits from the Army Corps of Engineers, the U.S. Fish and Wildlife Service, the Central Valley Regional Water Quality Control Board, and the California Department of Fish and Wildlife:

- A. Where a Section 404 Permit has been issued by the Army Corps of Engineers, or an application has been made to obtain a Section 404 Permit, the Mitigation and Management Plan required by that permit or proposed to satisfy the requirements of the Corps for granting a permit may be submitted for purposes of achieving a no net-loss of wetlands. The required Plan shall be submitted to the Sacramento County Environmental Coordinator, U.S. Army Corps of Engineers, and U.S. Fish and Wildlife Service for approval prior to its implementation.
- B. If regulatory permitting processes result in less than a 1:1 compensation ratio for loss of wetlands, the Project applicant shall demonstrate that the wetlands which went unmitigated/uncompensated as a result of permitting have been mitigated through other means. Acceptable methods include payment into a mitigation bank or protection of off-site wetlands through the establishment of a permanent conservation easement, subject to the approval of the Environmental Coordinator.

VI. CULTURAL RESOURCES

Would the project:	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☐	☒
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☒	☐	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

ENVIRONMENTAL SETTING

The following discussion and analysis are supported in part by the *Cultural Resources Support for the ARCO NWC Marysville and Elkhorn Project, Rio Linda, Sacramento County, California*.⁴⁵ The preparers of this draft IS/MND independently reviewed this technical report and determined it suitable for reliance, in combination with other materials included in the formal record, in preparation for this draft IS/MND.

The approximately 4.14-acre (180,358 square foot) project site consists of two parcels and is located in unincorporated Sacramento County, on the northwest corner of West Elkhorn Boulevard and Marysville Boulevard in the Rio Linda/Elverta Community Plan Area. Surrounding uses include a single-family residence and land used for equestrian and agricultural uses to the north, Marysville Boulevard to the east, West Elkhorn Boulevard to the south, and undeveloped land with agricultural uses to the west.

The project site currently contains a concrete pad located near the center of the site and three structures previously used for stables and storage located at the northwest corner of the project site. The remainder of the site consists of undeveloped land covered with native grasses, which was previously used for a horse pasture.

BACKGROUND RESEARCH

To determine the cultural resources sensitivity of the project site, SWCA completed a records search of the California Historical Resources Information System at the North Central Information Center (NCIC) (File No. SAC-23-187) on October 04, 2023. The records search included a review of all recorded cultural resources, previous studies, and additional information pertaining to cultural resources within a 0.25-mile radius of the project.

The records search results indicated no previously recorded cultural resources have been previously identified within the project site or the 0.25-mile search radius. The results also indicated that two cultural resource studies had been conducted within a 0.25-mile search radius, but not within the project site. SWCA also completed surface surveys of the project site

⁴⁵ SWCA Environmental Consultants, 2025. Cultural Resources Support for the ARCO NWC Marysville and Elkhorn Project, Rio Linda, Sacramento County, California.

in November 2023 and May 2024. No cultural resources were identified during the surveys. In addition, SWCA contacted the Native American Heritage Commission in November 2023 for a search of the Sacred Lands file; the NAHC Sacred Lands Files search for the project site was negative.

IMPACT DISCUSSION

- a. *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?*

No Impact. A significant impact would occur if the project would cause a substantial adverse change to a historical resource, herein referring to historic-era architectural resources or the built environment, including buildings, structures, and objects. A significant impact could occur if the project would cause a substantial adverse change to a historical resource through physical demolition, destruction, relocation, or alteration of the resource.

The NCIC records search results indicate that no previously recorded historical resources are present within the project site. Additionally, no historical resources, as defined by CEQA Section 15064.5, were observed during the pedestrian surveys. Based on historic maps and aerial imagery, the structures present within the project site were constructed in the 21st century and do not meet the minimum age threshold to qualify as potential historical resources. As there are no historical resources on the project site, the project would have no impact on historical resources.

- b. *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?*

Less than Significant with Mitigation. Archaeological resources can be considered historical resources, according to CEQA Guidelines Section 15064.5, as well as unique archaeological resources, as defined in PRC Section 21083.2(g). A significant impact could occur if the project would cause a substantial adverse change to an archaeological resource through physical demolition, destruction, relocation, or alteration of the resource.

Soils within the project site consist of San Joaquin fine sandy loam. The San Joaquin soil series is an older Pleistocene-age landform and does not have the potential to contain archaeological resources buried by natural alluvial processes.⁴⁶ Archaeological sites in this context would be located at or very near to the existing surface and would be identifiable during a pedestrian survey. The background research and survey efforts completed for the project did not identify any pre-contact or historic-era archaeological resources within the project site or a 0.25-mile radius. Additionally, the Sacred Lands File search results from the NAHC were negative.⁴⁷ In consideration of these results and the historic use of the project site, the archaeological sensitivity of the project site is low. While unlikely, there is the potential of encountering unanticipated cultural resources during ground-disturbing activities in undisturbed areas, which would result in a potentially significant impact. Implementation of Mitigation Measure CR-1 establishes steps to undertake in the event of an unanticipated discovery of cultural resources during construction. This impact would be less than significant with mitigation.

⁴⁶ Meyer, J. and J. S. Rosenthal, 2008. A Geoarchaeological Overview and Assessment of Caltrans District 3, Cultural Resources Inventory of Caltrans District 3 Rural Conventional Highways.

⁴⁷ SWCA, 2025.

- c. *Would the project disturb any human remains, including those interred outside of dedicated cemeteries?*

Less than Significant with Mitigation. The results of the background research and survey efforts completed for the project did not identify the presence of human burials within the project site. In consideration of these results and the historic use of the project site, it is unlikely that human remains would be encountered during the construction of the project. Despite the low potential, the possibility of inadvertent discovery cannot be entirely discounted and would result in a potentially significant impact. Implementation of Mitigation Measure CR-2 would require avoidance measures or the appropriate treatment of human remains if accidentally discovered during project construction. This impact would be less than significant with mitigation.

ENVIRONMENTAL MITIGATION MEASURES

MITIGATION MEASURE CR-1: CULTURAL RESOURCES - UNANTICIPATED DISCOVERY OF CULTURAL RESOURCES

In the event that unexpected cultural resources are discovered during project construction, work shall be halted until a qualified archaeologist can evaluate the resource encountered, as is outlined below.

1. **Unanticipated cultural resources.** In the event of an inadvertent discovery of cultural resources (excluding human remains) during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for pre-contact and historic archaeology, shall be retained at the Applicant's expense to evaluate the significance of the find. If it is determined due to the types of deposits discovered that a Native American monitor is required, the Guidelines for Monitors/Consultants of Native American Cultural, Religious, and Burial Sites as established by the Native American Heritage Commission shall be followed, and the monitor shall be retained at the Applicant's expense.
 - a. Work cannot continue within the 100-foot radius of the discovery site until the archaeologist and/or tribal monitor conducts sufficient research and data collection to make a determination that the resource is either 1) not cultural in origin; or 2) not potentially eligible for listing on the National Register of Historic Places or California Register of Historical Resources.
 - b. If a potentially-eligible resource is encountered, then the archaeologist and/or tribal monitor, Planning and Environmental Review staff, and project proponent shall arrange for either 1) total avoidance of the resource, if possible; or 2) test excavations or total data recovery as mitigation. The determination shall be formally documented in writing and submitted to the County Environmental Coordinator as verification that the provisions of CEQA for managing unanticipated discoveries have been met.

MITIGATION MEASURE CR-2: CULTURAL RESOURCES - UNANTICIPATED DISCOVERY OF HUMAN REMAINS

Unanticipated human remains. Pursuant to Sections 5097.97 and 5097.98 of the State Public Resources Code, and Section 7050.5 of the State Health and Safety Code, if a bone of unknown

origin is discovered during construction, work shall be halted within the 100-foot radius of the discovery and a qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for pre-contact and historic archaeology, shall be retained at the Applicant's expense to evaluate the significance of the find. If determined to be human bone, the County Coroner and Sacramento County Planning and Environmental Review shall be immediately notified. If the remains are determined to be Native American, the coroner shall notify the Native American Heritage Commission within 24 hours, and the Native American Heritage Commission shall identify the person or persons it believes to be the most likely descendent from the deceased Native American. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposition of, with appropriate dignity, the human remains and any associated grave goods.

VII. ENERGY

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

ENVIRONMENTAL SETTING

The proposed project is located in Sacramento County, where electricity and natural gas are supplied to end users by the Sacramento Municipal Utility District (SMUD) and Pacific Gas and Electric Company (PG&E), respectively. The following environmental setting focuses on electricity and transportation fuel sources, since the project would not use natural gas (see Mitigation Measure GHG-1).

ELECTRICITY

According to the California Energy Commission (CEC), in 2022, California's energy system generated 52 percent of electricity, 48 percent of natural gas, and less than 1 percent of petroleum consumed or used in the state. The rest of the state's energy is imported and includes electricity from the Pacific Northwest and the Southwest; natural gas purchases from Canada, Rocky Mountain states, and the southwest; and petroleum imported from Alaska and foreign sources.^{48,49,50} The total amount of energy consumed in Sacramento County in 2022 from residential and non-residential sectors was approximately 11,507 gigawatt-hours (GWh).⁵¹

SMUD is a community-owned electricity utility that serves Sacramento County and adjoining parts of Placer and Yolo counties. In 2022, SMUD's electricity sources included: large hydroelectric (25.4 percent), natural gas (45.6 percent), biomass and waste (1.6 percent), geothermal (3.8 percent), small hydroelectric (0.8 percent), solar (2.8 percent), wind (14.7 percent), nuclear (1.6 percent), and other (0.1 percent). Additionally, around 3.6 percent of SMUD's energy resources are from "unspecified sources of power," which means it was obtained through transactions and the specific generation source is not traceable.⁵²

⁴⁸ California Energy Commission (CEC), 2018. Natural Gas Research and Development Program: Proposed Program Plan and Funding Request for Fiscal Year 2018-2019. March 2018.

⁴⁹ CEC, 2022a. 2022 Total System Electric Generation. Web. Accessed June 9, 2025. <https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2022-total-system-electric-generation#:~:text=Highlights%20for%202022,from%2093%2C333%20GWh%20in%202021>.

⁵⁰ CEC, 2022b. Annual Oil Supply Sources to California Refineries. Web. Accessed October 23, 2023. <https://www.energy.ca.gov/data-reports/energy-almanac/californias-petroleum-market/annual-oil-supply-sources-california>.

⁵¹ CEC, 2023a. California energy Consumption Dashboards. "Electricity Consumption." Web. Accessed August 27, 2025. <https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-0>.

⁵² Sacramento Municipal Utility District (SMUD), 2022. 2022 Power Content Label.

TRANSPORTATION FUELS

Gasoline is by far the largest transportation fuel by volume used in California. Nearly all the gasoline used in California is obtained through the retail market. In 2023, approximately 13.6 billion gallons of gasoline were sold in California's retail market.⁵³ Diesel fuel is the second largest transportation fuel by volume used in California behind gasoline. It is estimated that nearly 51 percent of all diesel sales are retail sales. In 2023, 2.9 billion gallons of diesel were sold in California.⁵⁴ According to the United States Department of Energy's Energy Information Administration, nearly all semi-trucks, delivery vehicles, buses, trains, ships, boats and barges, farm, construction, and military vehicles and equipment have diesel engines.

Regular unleaded gasoline is used primarily to fuel passenger cars and small trucks. Diesel fuel is used primarily in large trucks and construction equipment. Both fuels are used widely within Sacramento County. The CEC estimates that 535 million gallons of gasoline and approximately 51 million gallons of diesel were sold in 2022 in Sacramento County.⁵⁵

REGULATORY SETTING

Energy efficiency is closely tied to the State's efforts to reduce GHG emissions and address global climate change. Therefore, many of the plans, policies, and regulations identified in Section IX, Greenhouse Gas Emissions, are also applicable to energy. The regulatory setting presented below focuses specifically on regulatory items related to energy efficiency and production in the context of the project.

STATE

LOW CARBON FUEL STANDARD

The California Air Resources Board (CARB) initially approved the Low Carbon Fuel Standard (LCFS) regulation in 2009, identifying it as one of the nine discrete early action measures in its original 2008 Scoping Plan to reduce California's GHG emissions. Originally, the LCFS regulation required at least a 10% percent reduction in the carbon intensity of California's transportation fuels by 2020 (compared to a 2010 baseline). On September 27, 2018, CARB approved changes to the LCFS regulation that require a 20% reduction in carbon intensity by 2030. These regulatory changes exceed the assumption in CARB's 2017 Climate Change Scoping Plan, which targeted an 18% reduction in transportation fuel carbon intensity by 2030 as one of the primary measures for achieving the state's GHG 2030 target.

ADVANCED CLEAN CARS II PROGRAM

In January 2012, pursuant to Recommended Measures T-1 and T-4 of the Scoping Plan, CARB approved the Advanced Clean Cars Program, a new emissions-control program for model years 2017 through 2025. In response to a midterm review of the standards in March 2017, CARB

⁵³ California Department of Tax and Fee Administration (CDTFA), 2025a. *Fuel Taxes Statistics & Reports*. "Motor Vehicle Fuel 10 Year Reports.xlsx". Web. Accessed August 27, 2025.

⁵⁴ CDTFA, 2025b. *Fuel Taxes Statistics & Reports*. "Taxable Diesel Gallons 10 Year Report.xlsx". Web. Accessed August 27, 2025.

⁵⁵ CEC, 2023b. *California Retail Fuel outlet Annual Reporting (CEC0A15) Results*. Web. Accessed October 23, 2023. <https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/california-retail-fuel-outlet-annual-reporting>

directed staff to begin working on post-2025-model-year vehicle regulations (Advanced Clean Cars II) to research additional measures to reduce air pollution from light-duty and medium-duty vehicles. Additionally, in September 2020, Governor Newsom signed Executive Order (EO) N-79-20, which established a goal for 100 percent of new passenger cars and trucks sold in California by 2035 to be zero-emissions and directed CARB to develop and propose regulations toward this goal. The primary mechanism for achieving these targets for passenger cars and light trucks is the Advanced Clean Cars II Program. CARB adopted the Advanced Clean Cars II regulations on August 25, 2022.

RENEWABLE PORTFOLIO STANDARD

The Renewable Portfolio Standard Program, as updated in 2018 (SB 100), requires the state to procure 60 percent of its electricity from renewable sources by 2030 and that CARB should plan for 100 percent eligible renewable energy resources and carbon-free sources by 2045. SB 1020, signed on September 16, 2022, revises SB 100, and instead requires that renewable energy resources and zero-carbon resources supply 90 percent of all retail electricity sales to end-use customers by December 31, 2035, 95 percent by December 31, 2040, and 100 percent by December 31, 2045; and supply 100 percent of electricity procured to serve all state agencies by December 31, 2035 (Public Utilities Code Sections 399.11, 399.30, and 454.33).

TITLE 24, CALIFORNIA CODE OF REGULATIONS

Title 24 of the California Code of Regulations (24 CCR) requires, among other things, that California homes and businesses meet strong energy efficiency measures, thereby lowering their energy use.

Part 6 of Title 24 contains the 2022 Building Energy Efficiency Standards for new residential and non-residential buildings, which went into effect on January 1, 2023.⁵⁶ The 2022 Standards focus on efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, and strengthens ventilation standards.

Part 11 of Title 24, the California Green Building Standards Code (CALGreen), establishes minimum mandatory standards as well as voluntary standards pertaining to the planning and design of sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and interior air quality. The 2022 CALGreen standards became effective on January 1, 2023. The nonresidential mandatory standards require the following measures that relate to utilities and service systems (24 CCR Part 11):

- Mandatory reduction in indoor water usage through installation of separate submeters or metering devices, and compliance with specified flow rates for plumbing fixtures and fittings and faucets and fountains.
- Mandatory reduction in outdoor water usage through compliance with a local water efficient landscaping ordinance or the California Department of Water Resources' Model Water Efficient Landscape Ordinance and installation for recycled water supply systems where available/applicable.

⁵⁶ CEC, 2022c. 2022 Building Energy Efficiency Standards for Residential and Nonresidential Buildings. August 2022.

- 65 percent of construction and demolition waste must be diverted from landfills and 100 percent of trees, stumps, rocks, and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled.
- Provide readily accessible areas for recycling that serve the entire building.
- Mandatory inspections of energy systems to ensure optimal working efficiency.
- Inclusion of electric vehicle charging stations or designated spaces capable of supporting future charging stations.

LOCAL

COUNTY OF SACRAMENTO GENERAL PLAN

The Sacramento County General Plan Energy Element contains the following policy relevant to the project:⁵⁷

- **EN-5.** Reduce travel distances and reliance on the automobile and facilitate increased use of public transit through appropriate land use plans and regulations.

IMPACT DISCUSSION

- a. *Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

Less than Significant. Project construction and operation would consume energy resources, primarily in the form of gasoline and diesel fuels as well as electricity; however, as discussed further in this response, this energy consumption would not be wasteful, inefficient, or unnecessary.

Construction

Construction of the proposed project would require the use of fuel-powered equipment and vehicles for construction activities, energy, and water. Heavy construction equipment (e.g., cranes, dump trucks, backhoes, loaders) and generators would be diesel powered, while most smaller construction vehicles, such as pick-up trucks, would be gasoline powered. Project construction would also require the use of fuel-powered equipment and vehicles for construction activities. The project's construction energy demand was estimated using the off-road equipment information contained in the CalEEMod output files (see Appendix A) and subsequent calculations prepared using the CARB 2024 Carl Moyer Program Guidelines and on-road vehicle fuel economy estimates generated for Sacramento County using EMFAC (version 1.0.2).⁵⁸ Spreadsheets detailing the project's construction energy calculations are included as Appendix G.

⁵⁷ County of Sacramento, 2017. *General Plan Energy Element*. County of Sacramento Office of Planning and Environmental Review. Last amended September 26, 2017.

⁵⁸ California Air Resources Board (CARB), 2024. 2024 Carl Moyer Program Guidelines, Appendix D: Tables for Emission Reduction and Cost-Effectiveness Calculations. Approved October 25, 2024. Available online: <https://ww2.arb.ca.gov/sites/default/files/2024-11/Appendix%20D.pdf>. Accessed September 22, 2025.

Heavy equipment associated with construction of the proposed project would use approximately 30,675 gallons of diesel. Approximately 1,431 gallons of diesel would be used by trucks (both onsite and offsite) during construction of the proposed project or variant, respectively. In addition, during construction of the proposed project, approximately 1,129 gallons of gasoline would be used by worker vehicles.

Construction of the proposed project would occur over approximately 11 months; thus, construction-related energy use would be temporary. Construction activities would not have a measurable effect on regional energy supplies or on peak energy demand resulting in a need for additional capacity. Furthermore, consistent with Title 13, CCR, Section 2485, County General Plan Policy AQ-16, and SMAQMD Best Construction Emissions Control Practices (incorporated into the project as Mitigation Measure AQ-1), on- and off-road vehicle idling would be limited to 5 minutes. Signage would be posted at the entrances to the site to inform workers of this requirement. Therefore, as a temporary activity, the use of these resources during construction would not be wasteful or inefficient. Furthermore, energy is a necessary component of development activities; thus, it would not be unnecessary.

Operations

Energy use associated with operation of the proposed project would include onsite usage associated with buildings; electricity for offsite water treatment and distribution; and fuel from mobile sources.

The project would be subject to the building energy standards contained in the 2022 Title 24 Building Standards Code, which was adopted by the County on November 15, 2022, through ordinance SCC 1710 § 4, 2022. As described in the Regulatory Setting, Parts 6 and 11 of the 2022 Title 24 Building Standards Code require new development, such as the structures proposed by the project, to adhere to energy efficiency standards that have become more stringent (i.e., energy efficient) over time. The project would further improve its energy efficiency through the implementation of Mitigation Measure GHG-1, which would require the project to be designed and constructed without natural gas infrastructure. This would reduce the quantity of non-renewable energy resources consumed by the project. As estimated in CalEEMod, the project is estimated to consume approximately 1,194,882 kWh from on-site building energy use (see Appendix A).⁵⁹

Upon commencing operations, the project would also consume energy associated with vehicle trips made to and from the site. Operational mobile-source fuel consumption was estimated based on an estimate of 12,965,409 VMT per year⁶⁰ and on-road vehicle fuel economy estimates developed for Sacramento County using EMFAC (version 1.0.2) (see Appendix G for spreadsheets detailing the project's operational mobile-source energy calculations). Mobile sources during operation of the proposed project would use approximately 61,165 and 462,288 gallons of diesel and gasoline fuel, respectively and 288,157 kWh per year for EV travel. These estimates are considered to be conservative, however, as the project is anticipated to be a local serving use (see Section IX, Greenhouse Gas Emissions, and Section XVIII, Transportation). Most of the vehicle trips to the site for fuel dispensing would be existing trips that are either pass-by trips or diverted trips, meaning that most of the trips associated with the project are already occurring. Therefore, the

⁵⁹ Helix Environmental Planning, 2025. West Elkhorn ARCO ampm/Commercial Project Air Quality and Greenhouse Gas Emissions Technical Report. March 2025.

⁶⁰ Ibid.

mobile-source energy estimates presented are likely to overstate the energy demand associated with vehicle trips made to and from the site. Implementation of Mitigation Measure AQ-2 and Mitigation Measure GHG-1 would further assist the project in reducing the potential for wasteful or inefficient energy consumption. Mitigation Measure AQ-2 would require the installation of signage that reminds heavy-duty truck drivers (e.g., fuel deliveries) of anti-idling regulations, and Mitigation Measure GHG-1 would require the project to install electric vehicle (EV) charging infrastructure based on the CALGreen Tier 2 standards. Both of these measures serve to reduce non-renewable fuel consumption associated with the project.

Operation of the proposed project would consume energy resources; however, the project would not use energy in a wasteful, inefficient, or unnecessary manner. The project would comply with the energy efficiency standards contained in the 2022 Title 24 Building Standards Code, improve upon the Title 24 energy standards by developing the project without natural gas infrastructure, install signage reminding applicable vehicles of anti-idling regulations, and provide EV charging infrastructure. The proposed project would not have a measurable effect on regional energy supplies or on peak energy demand resulting in a need for additional capacity. Electric service would be provided to meet the needs of the proposed project, as required by the California Public Utilities Commission, which obligates PG&E and SMUD to provide service to their existing and potential customers. PG&E and SMUD update their service projections to meet regional energy and water demand. The project elements described previously would decrease overall energy consumption, decrease reliance on non-renewable energy sources, and increase reliance on renewable energy sources.

Therefore, operation of the proposed project would not use energy in a wasteful, inefficient, or unnecessary manner.

Conclusion

Neither construction nor operation of the project would use energy resources in an inefficient, or unnecessary manner. Impacts related to the use of energy resources during construction and operation would be less than significant.

- b. *Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

Less than Significant. California's renewable energy and energy efficiency plans include 1) the Renewables Portfolio Standard Program (as revised by SB 1020), which required utilities to increase the quantity of renewable electricity supplied to end-use customers to 90 percent by December 31, 2035, and 2) the California Energy Efficiency Strategy Plan, which was developed to provide a roadmap for energy efficiency in California through the year 2020 and beyond. SB 1020 further strengthened renewable energy goals by establishing new targets to supply the state with 95 percent renewable electricity by December 31, 2040, and 100 percent by December 31, 2045. The project would indirectly benefit from these statewide mandates and plans, which would be realized on the local scale.

During operations, the proposed project is estimated to annually consume approximately 462,288 gallons of gasoline, 61,165 gallons of diesel, and 288,157 kWh of electricity for vehicle fuel, based on 12,965,409 VMT (see Appendix G).⁶¹ As discussed in response a), most of the vehicle trips (and VMT) associated with the project are likely to be diverted or

⁶¹ Ibid.

passby trips (i.e., many of the trips associated with the project are not “new”). These estimates, therefore, are considered to be conservative (i.e., likely an overestimate of what would actually occur). The project would be local serving and therefore could reduce the length of existing trips by placing a refueling station along an existing trip route. This in turn would support the goals of General Plan Policy EN-5 by reducing existing trip lengths. The project would also indirectly benefit from improvements in vehicle fuel economy, such as those that may be realized under the Advanced Clean Cars II Program. Additionally, pursuant to Mitigation Measure AQ-2, the project would install signage to remind truck drivers visiting the site of CARB’s anti-idling regulations, thereby reducing the potential for wasteful fuel use.

The proposed project would not interfere with State or local plans adopted for the purposes of increasing renewable energy or improving energy efficiency. This impact would be less than significant.

ENVIRONMENTAL MITIGATION MEASURES

None recommended.

VIII. GEOLOGY AND SOILS

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

ENVIRONMENTAL SETTING**REGIONAL GEOLOGY**

The project site is located within the Sacramento Valley and lies within the Great Valley geomorphic province. The Great Valley is an alluvial plain about 50 miles wide and 400 miles long in the central part of California, bound by the Coast Mountain Ranges on the west, the Sierra Nevada on the east, and the Klamath and Cascade Mountain Ranges on the north. The northern part is the Sacramento Valley, drained by the Sacramento River, and the southern part

is the San Joaquin Valley, drained by the San Joaquin River. The Great Valley is a trough in which sediments have been deposited almost continuously since the Jurassic Period (about 160 million years ago).⁶²

The Great Valley is further divided into four geomorphic subunits: the Delta, River Floodplain, Alluvial Plain, and Low Foothills. The project site is located in the River Floodplain subunit, which consists of unconsolidated inorganic soils formed by sediment deposition when floodwaters overtopped the natural levees of the County's rivers and major streams.⁶³

FAULTS AND SEISMICITY

There are no major active faults that transect Sacramento County, nor are there Alquist-Priolo Earthquake Fault Zones within the County.⁶⁴ The closest Alquist-Priolo Earthquake Fault Zone is the Green Valley Fault, located approximately 45 miles southwest of the project site. Several subsurface faults occur in the vicinity of Sacramento County; the closest fault to the project site is the Dunnigan Hills Fault, located approximately 20 miles to the west. The Dunnigan Hills Fault is classified as a Late Quaternary fault, with displacement within the past 700,000 years.⁶⁵

GROUND SHAKING

Ground shaking results from the release of energy during fault rupture can cause damage or collapse of buildings and other structures. Although there are no major active faults within Sacramento County, the region has experienced ground shaking from surrounding faults.⁶⁶ The California Geological Survey (CGS) has prepared a statewide map showing the expected intensity of ground shaking from potential future earthquakes. The map indicates that the project site is within an area classified as Intensity VIII (severe shaking potential) on the Modified Mercalli Intensity scale.⁶⁷

LIQUEFACTION

Liquefaction occurs when strong ground motion increases pore-water pressures, causing granular soil to temporarily lose strength and behave as a fluid. This process can result in settlement, lateral spreading, and structural damage, even in relatively flat areas. Liquefaction is most likely

⁶² California Geological Survey, 2002. *California Geomorphic Provinces, Note 36*. Available at: <https://www.conservation.ca.gov/cgs/Documents/Publications/CGS-Notes/CGS-Note-36.pdf>. Accessed July 24, 2025.

⁶³ County of Sacramento, 2022. *Sacramento County General Plan Safety Element Background*. Available at: <https://planning.saccounty.gov/PlansandProjectsIn-Progress/Documents/Safety.pdf>. Accessed July 24, 2025.

⁶⁴ Ibid.

⁶⁵ California Department of Conservation, 2010. *Fault Activity Map of California*. Available at: <https://maps.conservation.ca.gov/cgs/fam/>. Accessed July 24, 2025.

⁶⁶ County of Sacramento, 2022. *Sacramento County General Plan Safety Element Background*. Available at: <https://planning.saccounty.gov/PlansandProjectsIn-Progress/Documents/Safety.pdf>. Accessed July 24, 2025.

⁶⁷ California Geological Survey, 2025. *Earthquake Shaking Potential for California, Map Sheet 48*. Available at: [https://www.conservation.ca.gov/cgs/sh/earthquake-shaking-potential#:~:text=The%20California%20Geological%20Survey%20\(CGS,basins%20generally%20experience%20amplified%20shaking](https://www.conservation.ca.gov/cgs/sh/earthquake-shaking-potential#:~:text=The%20California%20Geological%20Survey%20(CGS,basins%20generally%20experience%20amplified%20shaking). Accessed July 24, 2025.

in areas with unconsolidated granular sediment and shallow groundwater. According to the CGS, the project site is not within a designated liquefaction zone.⁶⁸

LANDSLIDES

Landslides typically occur on moderate to steep slopes when masses of rock or soil move downslope. They may result from natural events such as rainfall, earthquakes, or soil erosion, or human activities such as grading, which can result in unstable fill slopes or excessive cuts. Factors that affect slope stability include slope angle and the strength of the rock or soil materials. According to the California Department of Conservation, the project site is not within an area designated as being susceptible to landslides.⁶⁹

PALEONTOLOGICAL RESOURCES

Paleontological resources, or fossils, are the preserved remains of once-living organisms. These include fossilized bones, plants, shells, or trace evidence such as trackways, burrows, and imprints. Fossils older than about 5,000 years (i.e., older than middle Holocene in age) may be considered paleontological resources and are typically preserved in sedimentary rocks. Although rare, fossils may also be preserved in metamorphic rocks under certain conditions. Fossils occur discontinuously and unpredictably within some geologic units, depending on depositional history. As discussed in the Sacramento County General Plan Conservation Element, at least five recorded sites in Sacramento County have revealed fossil remains dating back as far as 100,000 years ago.⁷⁰

REGULATORY SETTING

STATE

ALQUIST-PRIOLO EARTHQUAKE FAULT ZONING ACT

The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to protect structures for human occupancy from the hazard of surface faulting. In accordance with the act, the State Geologist has established regulatory zones—called earthquake fault zones—around the surface traces of active faults and has published maps showing these zones. Buildings for human occupancy cannot be constructed across surface traces of faults that are determined to be active. Because many active faults are complex and consist of more than one branch that may experience ground surface rupture, earthquake fault zones extend approximately 200 to 500 feet on either side of the mapped fault trace.

⁶⁸ California Department of Conservation, California Geological Survey, 2024. *CGS Seismic Hazards Program: Liquefaction Zones*. Available at: <https://maps-cnra-cadoc.opendata.arcgis.com/datasets/cadoc::cgs-seismic-hazards-program-liquefaction-zones/explore?location=35.894110%2C-121.257934%2C7.79>. Accessed July 24, 2025.

⁶⁹ California Department of Conservation, 2018. *Deep-Seated Landslide Susceptibility and Recent Fire Parameters*. Available at: <https://maps.conservation.ca.gov/cgs/firelandslide/app/>. Accessed July 24, 2025.

⁷⁰ County of Sacramento, 2017. *Sacramento County General Plan Conservation Element*, amended September 26, 2017. Available at: <https://planning.saccounty.gov/LandUseRegulationDocuments/Documents/General-Plan/Conservation%20Element%20-%20Amended%2009-26-17.pdf>. Accessed July 24, 2025.

CALIFORNIA BUILDING CODE

The proposed project would be subject to the applicable sections of CBC Title 24, Part 2, which is administered by the California Building Standards Commission. Under state law, all building standards must be centralized in Title 24 to be enforceable. The CBC contains necessary California amendments, which are based on American Society of Civil Engineers/Structural Engineering Institute Standards. These standards provide requirements for general structural design and include means for determining earthquake loads, as well as other loads for inclusion into building codes. The earthquake design requirements take into account the occupancy category of the structure, site class, soil classifications, and various seismic coefficients, which are used to determine a seismic design category for a project. Once a project is categorized according to a seismic design category, design specifications can be determined. The provisions of the CBC apply to the construction, alteration, movement, replacement, and demolition of every building or structure—or any appurtenances connected or attached to such buildings or structures—throughout California.

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) CONSTRUCTION GENERAL PERMIT

Project construction would be subject to the National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order 2022-0057-DWQ, NPDES No. CAS000002), commonly referred to as the Construction General Permit. The Construction General Permit regulates discharges of sediment and other pollutants in stormwater associated with construction activity to waters of the United States from construction sites that disturb 1 acre or more of land surface, or that are part of a common plan of development or sale that disturbs more than 1 acre of land surface. The permit regulates stormwater discharges associated with construction or demolition activities, such as clearing and excavation; construction of buildings; and linear underground projects, including installation of water pipelines and other utility lines.

The Construction General Permit requires the development and implementation of a storm water pollution prevention plan (SWPPP) that includes specific best management practices (BMPs) designed to prevent sediment and other pollutants from contacting stormwater from moving off-site into receiving waters. The BMPs fall into several categories, including erosion control, sediment control, waste management, and good housekeeping and are intended to protect surface water quality by preventing eroded soil and construction-related pollutants from migrating off-site. The Construction General Permit requires routine inspection of all BMPs. Additionally, the SWPPP must contain a visual monitoring program, a chemical monitoring program for non-visible pollutants, and a sediment monitoring plan if the site discharges directly to a water body listed on the CWA Section 303(d) list for sediment. The SWPPP must be prepared before construction begins. The SWPPP must list BMPs and the placement of those BMPs that the applicant would use to protect stormwater runoff. Examples of typical construction BMPs include scheduling or limiting certain activities to dry periods, installing sediment barriers such as a silt fence and fiber rolls, and maintaining equipment and vehicles used for construction. Non-stormwater management measures include installing specific discharge controls during certain activities, such as paving operations and vehicle and equipment washing and fueling. The Construction General Permit also sets post-construction standards (i.e., implementation of BMPs to reduce pollutants in stormwater discharges from the site after construction).

CALIFORNIA ENVIRONMENTAL QUALITY ACT

CEQA does not define a “unique paleontological resource or site.” However, the Society of Vertebrate Paleontology has provided guidance specifically designed to support state and federal environmental review. The Society of Vertebrate Paleontology broadly defines significant paleontological resources as follows:

[F]ossils 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).

Significant paleontological resources are determined to be fossils or assemblages of fossils that are unique, unusual, rare, or diagnostically important, or are common but have the potential to provide valuable scientific information for evaluating evolutionary patterns and processes, or which could improve researchers’ understanding of paleochronology, paleoecology, or depositional histories. New or unique specimens can provide new insights into evolutionary history; however, additional specimens of even well-represented lineages can be equally important for studying evolutionary pattern and process, and evolutionary rates. Even unidentifiable material can provide useful data for dating geologic units if radiocarbon dating is possible. As such, common fossils (especially vertebrates) may be scientifically important, and therefore considered significant.

PUBLIC RESOURCES CODE SECTION 5097.5 AND SECTION 30244

State requirements for management of paleontological resources are included in Public Resources Code (PRC) Section 5097.5 and Section 30244. These statutes prohibit the removal of any paleontological site or feature from public lands without permission of the jurisdictional agency, define the removal of paleontological sites or features as a misdemeanor, and require reasonable mitigation of adverse impacts on paleontological resources from developments on public (state, county, city, district) lands.

LOCAL

SACRAMENTO COUNTY CODE 16.44 LAND GRADING AND EROSION CONTROL

The Land Grading and Erosion Control Ordinance aims to minimize the damage to surrounding properties and public rights-of-way, the degradation of the water quality of watercourses, and the disruption of natural or County authorized drainage flows caused by the activities of clearing and grubbing, grading, filling and excavating of land, and sediment and pollutant runoff from other construction related activities. The Ordinance also intends to comply with the provisions of the County's National Pollutant Discharge Elimination System (NPDES) Permit Number, CA0082597, issued by the California Regional Water Quality Control Board (Regional Board).

IMPACT DISCUSSION

a. *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:*

i. *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*

Less than Significant. The project site is not located in an Earthquake Fault Zone as delineated by the Earthquake Zones of Required Investigation Map published by the CGS under the Alquist-Priolo Earthquake Fault Zoning Act.⁷¹ As described above, there are no Alquist-Priolo Earthquake Fault Zones within Sacramento County, and the nearest such fault is the Green Valley Fault, located approximately 45 miles southwest of the project site. Therefore, implementation of the proposed project would not result in substantial adverse effects related to fault rupture.

ii. *Strong seismic ground shaking?*

Less than Significant. The intensity of ground shaking is dependent on the proximity to the epicenter of the site, the magnitude of the earthquake, and local soil conditions. Although there are no known active earthquake faults in the project vicinity, the project site could be subject to some ground shaking from regional faults. The 2025 Earthquake Shaking Potential for California map shows the project area is mapped as having the potential to experience severe shaking (Modified Mercalli Intensity VIII). However, all new development in Sacramento County must comply with the California Building Code (CBC), which requires structures and permanently attached nonstructural components to be designed to withstand earthquake motions. The CBC specifies development regulations which would ensure that adverse impacts resulting from seismic ground shaking would be less than significant. Therefore, the proposed project would be constructed in compliance with applicable CBC standards and engineering requirements, ensuring that potential impacts from seismic ground shaking would be less than significant.

iii. *Seismic-related ground failure, including liquefaction?*

Less than Significant. According to CGS mapping and the Earthquake Zones of Required Investigation Maps (EZRIM), the project site is not located within a designated liquefaction zone. Due to the site's flat terrain and distance from major faults and bodies of water, liquefaction impacts are anticipated to be low. Additionally, compliance with CBC requirements for grading, foundations, and structural design would ensure that potential liquefaction-related hazards are reduced or avoided. Therefore, impacts related to liquefaction would be less than significant.

⁷¹ California Department of Conservation, California Geological Survey, 2024. *Earthquake Zones of Required Investigation*, updated November 21, 2024. Available at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/>. Accessed July 24, 2025.

iv. Landslides?

No Impact. The project site is located on flat terrain and is devoid of any geologic features that would have the potential for landslides. Additionally, mapping by the Department of Conservation (DOC) and EZRIM show the project site is not located within an earthquake-induced landslide zone. Therefore, there would be no impact.

b. Would the project result in substantial soil erosion or the loss of topsoil?

Less than Significant. Project construction would involve clearing, grading, excavation, filling, and temporary soil stockpiling, all of which could expose site soils to erosion from wind and surface water runoff. The project would be subject to Sacramento County's Land Grading and Erosion Control Ordinance (County Code Chapter 16.44), which requires a Grading and Erosion Control Permit. In addition, because the project would disturb more than one acre of land, a project-specific SWPPP would be required. The SWPPP would specify BMPs and erosion control measures to be implemented to reduce erosion during construction. Compliance with these federal, state, and local requirements would ensure that impacts related to soil erosion or loss of topsoil would be less than significant.

c. Would the project 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?

Less than Significant. As discussed above, the project site is located on a relatively flat terrain and is not subject to landslide hazards. While the project site could be susceptible to lateral spreading, subsidence, liquefaction, or collapse under certain conditions, these risks would be addressed through standard permitting requirements. Under Chapter 22.90 of the Sacramento County Code and the CBC, a preliminary soils report (referred to the County as a geotechnical report) is required prior to development. If such a report identifies expansive soils or other unstable conditions, a follow-up soils or geotechnical investigation would be required to recommend corrective actions to prevent structural damage. Additionally, under Sacramento County General Plan Safety Element Policy SA-1, the County shall require soils reports and appropriate mitigation measures for new development located in seismic and geologically sensitive areas.⁷² The proposed project would be designed and constructed in accordance with CBC standards, County Code requirements, and site-specific recommendations from a soils/geotechnical report. With compliance, impacts related to unstable geologic units or soils would be less than significant.

d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less than Significant. According to the Sacramento County General Plan Safety Element Background, expansive soils represent approximately one-third of all soil types in Sacramento County. These soils are largely comprised of clays, which expand when wet and shrink when dry. In accordance with the State Subdivision Map Act, the County Grading Ordinance, and Chapter 22.90 of the Sacramento County Code, a preliminary soil report (referred to by the County as a geotechnical report) is required prior to issuance of building

⁷² The County refers to soils reports as geotechnical reports.

permits in areas where expansive soils may be present.⁷³ The purpose of the soils report is to identify potential hazards and recommend corrective measures to eliminate hazardous soil conditions, including from expansive soils. In addition, project-related development must adhere to the CBC, which ensures structural protection within areas containing expansive soils. The project would comply with the State Subdivision Map Act, the County Grading Ordinance, Chapter 22.90 of the County Code, and the California Building Code, which requires a preliminary geotechnical report and prescribes design measures where expansive soils could affect structures. In the event that the project site is underlain by expansive soils, compliance with County Code requirements, CBC standards, and recommendations of a site-specific soils report would reduce or avoid risks to life or property. Therefore, impacts related to expansive soils would be less than significant.

- e. *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?*

No Impact. No septic tanks or alternative wastewater disposal systems are proposed as part of the project. Therefore, no impact associated with the use of such systems would occur.

- f. *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

Less than Significant with Mitigation. According to a California Preliminary Geologic Map of the Sacramento area, the project site is underlain by Pleistocene-age Riverbank Formation (Middle unit).⁷⁴ Pleistocene-age Riverbank Formation geologic units are considered to have a high potential to contain significant fossils.⁷⁵ During the construction of the proposed project, unknown paleontological resources could potentially be encountered, particularly during ground-disturbing activities.

The Sacramento County General Plan Conservation Element includes Policy CO-161, which requires discretionary projects to include appropriate mitigation where development could adversely affect paleontological resources. Policy CO-162 further requires projects in sensitive areas to be monitored to ensure proper treatment of resources and compliance with reporting, safeguards, and procedures. Consistent with Policy CO-162, Mitigation Measure GEO-1 would require ceasing work in the event paleontological resources are discovered during ground disturbing activities and to implement steps to assess and recover the resources. This impact would be less than significant with mitigation.

⁷³ County of Sacramento, 2022. *Sacramento County General Plan Safety Element Background*. Available at: <https://planning.saccounty.gov/PlansandProjectsIn-Progress/Documents/Safety.pdf>. Accessed July 24, 2025.

⁷⁴ Gutierrez, Carlos I., 2011. *Preliminary Geologic Map of the Sacramento 30' x 60' Quadrangle, California*. Available at: <https://www.conservation.ca.gov/cgs/rgm/preliminary>. Accessed July 24, 2025.

⁷⁵ California Department of Water Resources, 2013. *Bay Delta Conservation Plan Draft EIR/EIS*. Available at: https://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/california_waterfix/exhibits/exhibit4/docs/Public_Draft_BDCP_EIR-EIS_Chapter_27_-_Paleontological_Resources.sflb.pdf. Accessed July 24, 2025.

ENVIRONMENTAL MITIGATION MEASURES

MITIGATION MEASURE GEO-1: INADVERTENT DISCOVERY OF PALEONTOLOGICAL RESOURCES

If paleontological resources are discovered during earthmoving activities, the project applicant shall immediately cease work in the vicinity of the find and notify the Sacramento County Planning and Environmental Review. Retain a qualified paleontologist to evaluate the resource and prepare a recovery plan based on Society of Vertebrate Paleontology Guidelines.⁷⁶ The recovery plan may include, but is not limited to, a field survey, construction monitoring, sampling and data recovery procedures, museum curation for any specimen recovered, and a report of findings. Recommendations in the recovery plan that are determined by the County to be necessary and feasible will be implemented before construction activities can resume at the site where the paleontological resources were discovered.

⁷⁶ Society of Vertebrate Paleontology, 2010. *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources*. Available at: https://vertpaleo.org/wp-content/uploads/2021/01/SVP_Impact_Mitigation_Guidelines.pdf. Accessed August 28, 2025.

IX. GREENHOUSE GAS EMISSIONS

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☒	☐	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

The following environmental and regulatory settings and analysis were obtained from the *West Elkhorn ARCO ampm/Commercial Project Air Quality and Greenhouse Gas Emissions Technical Report* prepared by Helix Environmental Planning, dated March 2025, and included as Appendix A to this Initial Study.⁷⁷

ENVIRONMENTAL SETTING

CLIMATE CHANGE OVERVIEW

Global climate change refers to changes in average climatic conditions on Earth including temperature, wind patterns, precipitation, and storms. Global temperatures are moderated by atmospheric gases. These gases are commonly referred to as GHGs because they function like a greenhouse by letting sunlight in but preventing heat from escaping, thus warming the Earth's atmosphere.

GHGs are emitted by natural processes and human (anthropogenic) activities. Anthropogenic GHG emissions are primarily associated with: (1) the burning of fossil fuels during motorized transport, electricity generation, natural gas consumption, industrial activity, manufacturing, and other activities; (2) deforestation; (3) agricultural activity; and (4) solid waste decomposition.

The temperature record shows a decades-long trend of warming, with earth's average surface temperature in 2024 confirmed the warmest on record. Per scientists at the National Aeronautics and Space Administration's (NASA's) Goddard Institute for Space Studies, global temperatures in 2024 were around 2.3 degrees Fahrenheit (°F) higher than the 1951-1980 average.⁷⁸ GHG emissions from human activities are the most significant driver of observed climate change since the mid-20th century.⁷⁹ The IPCC constructed several emission trajectories of GHGs needed to stabilize global temperatures and climate change impacts. The statistical models show a "high confidence" that temperature increase caused by anthropogenic GHG emissions could be kept to less than two degrees Celsius relative to pre-industrial levels if atmospheric concentrations are stabilized at about 450 parts per million (ppm) carbon dioxide equivalent (CO₂e) by the year 2100.⁸⁰

⁷⁷ Helix Environmental Planning, 2025. *West Elkhorn ARCO ampm/Commercial Project Air Quality and Greenhouse Gas Emissions Technical Report*. March 2025.

⁷⁸ Ibid. (pg. 27)

⁷⁹ Ibid. (pg. 27)

⁸⁰ Ibid. (pg. 27)

TYPES OF GREENHOUSE GASES

The GHGs defined under California's Assembly Bill (AB) 32 include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆).

- **Carbon Dioxide.** CO₂ is the most important and common anthropogenic GHG. CO₂ is an odorless, colorless GHG. Natural sources include the decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungi; evaporation from oceans; and volcanic outgassing. Anthropogenic sources of CO₂ include burning fuels, such as coal, oil, natural gas, and wood. Data from ice cores indicate that CO₂ concentrations remained steady prior to the current period for approximately 10,000 years. The atmospheric CO₂ concentration in 2010 was 390 ppm, 39 percent above the concentration at the start of the Industrial Revolution (about 280 ppm in 1750). The February 2025 monthly average CO₂ concentration was 427 ppm, a 52 percent increase since 1750.⁸¹
- **Methane.** CH₄ is the main component of natural gas used in homes. A natural source of methane is from the decay of organic matter. Geological deposits known as natural gas fields contain methane, which is extracted for fuel. Other sources are from decay of organic material in landfills, fermentation of manure, and cattle digestion.⁸²
- **Nitrous Oxide.** N₂O is produced by both natural and human-related sources. N₂O is emitted during agricultural and industrial activities, as well as during the combustion of fossil fuels and solid waste. Primary human-related sources of N₂O are agricultural soil management, animal manure management, sewage treatment, mobile and stationary combustion of fossil fuel, adipic (fatty) acid production, and nitric acid production.⁸³
- **Hydrofluorocarbons.** Hydrofluorocarbons are commonly used by federal agencies in a wide variety of applications, including refrigeration, air-conditioning (AC), building insulation, fire extinguishing systems, and aerosols. HFCs have high global warming potential (GWP), raising concern about their impacts as they become increasingly used as replacements for ozone-depleting substances (ODS), and as economic growth spurs demand for new equipment, especially in the refrigeration/AC sector.⁸⁴
- **Perfluorocarbons.** Perfluorocarbons are synthetic compounds containing just fluorine and carbon. They are generally colorless, odorless, non-flammable gases at environmental temperatures and for the most part chemically unreactive. PFCs replace chlorofluorocarbons (CFCs) in manufacturing semiconductors. They are also used as solvents in the electronics industry, and as refrigerants of some specialized refrigeration systems.⁸⁵
- **Sulfur Hexafluoride.** SF₆ is an inorganic, odorless, colorless, nontoxic, nonflammable gas. SF₆ is used for insulation in electric power transmission and distribution equipment,

⁸¹ Ibid. (pg. 28)

⁸² Ibid. (pg. 28)

⁸³ Ibid. (pg. 28)

⁸⁴ Ibid. (pg. 28)

⁸⁵ Ibid. (pg. 28)

in the magnesium industry, in semi-conductor manufacturing, and as a tracer gas for leak detection.⁸⁶

GHGs have long atmospheric lifetimes that range from one year to several thousand years. Long atmospheric lifetimes allow for GHG emissions to disperse around the globe. Because GHG emissions vary widely in the power of their climatic effects, climate scientists have established a unit called GWP. The GWP of a GHG is a measure of both potency and lifespan in the atmosphere as compared to CO₂. For example, a gas with a GWP of 10 is 10 times more potent than CO₂ over 100 years. CO₂e is a quantity that enables all GHG emissions to be considered as a group despite their varying GWP. The GWP of each GHG is multiplied by the prevalence of that gas to produce CO₂e.

Historically, GHG emission inventories have been calculated using the GWPs from the IPCC's Second Assessment Report (AR2). In 2007, IPCC updated the GWP values based on the latest science at the time in its Fourth Assessment Report (AR4). The updated GWPs in the IPCC AR4 have begun to be used in recent GHG emissions inventories. In 2013, IPCC again updated the GWP values based on the latest science in its Fifth Assessment Report (AR5).⁸⁷ However, the United Nations Framework Convention on Climate Change (UNFCCC) reporting guidelines for national inventories require the use of GWP values from the AR4. To comply with international reporting standards under the UNFCCC, official emission estimates for California and the U.S. are reported using AR4 GWP values, and statewide and national GHG inventories have not yet updated their GWP values to the AR5 values. Project GHG emissions in this analysis are reported using the AR4 GWP values.⁸⁸

By applying the GWP ratios, project-related CO₂e emissions can be tabulated in metric tons (MT) per year. Typically, the GWP ratio corresponding to the warming potential of CO₂ over a 100-year period is used as a baseline. The atmospheric lifetime and GWP of selected GHGs are summarized in Table IS-5, *Global Warming Potentials and Atmospheric Lifetimes*.

Table IS-5: Global Warming Potentials and Atmospheric Lifetimes

Greenhouse Gas	Atmospheric Lifetime (Years)	IPCC AR2 GWP	IPCC AR4 GWP	IPCC AR5 GWP
Carbon Dioxide (CO ₂)	50-200	1	1	1
Methane (CH ₄)	12	21	25	28
Nitrous Oxide (N ₂ O)	114	310	298	265
HFC-134a	14	1,300	1,430	1,300
PFC: Tetrafluoromethane (CF ₄)	50,000	6,500	7,390	6,630
PFC: Hexafluoroethane (C ₂ F ₆)	10,000	9,200	12,200	11,100
Sulfur Hexafluoride (SF ₆)	3,200	23,900	22,800	23,500
Notes: IPCC = Intergovernmental Panel on Climate Change; GWP = global warming potential; HFC = hydrofluorocarbon; PFC = perfluorocarbon Source: Helix, 2025; Table 4 (pg. 29)				

⁸⁶ Ibid. (pg. 28)

⁸⁷ Ibid. (pg. 29)

⁸⁸ Ibid. (pg. 29)

GREENHOUSE GAS EMISSION INVENTORIES

WORLDWIDE GHG INVENTORY

In 2020, total GHG emissions worldwide were estimated at 50,510 million metric tons (MMT) of CO₂e emissions.⁸⁹ By country, the U.S. contributed the second largest portion (10.5 percent) of global GHG emissions, behind the largest contributor, China (with 24.4 percent of global emissions). The total U.S. GHG emissions were 5,298 MMT CO₂e in 2021.⁹⁰ On a national level, approximately 90 percent of GHG emissions were associated with energy, including transportation energy.⁹¹

CALIFORNIA GHG INVENTORY

CARB performed statewide inventories for the years 1990 to 2022, as shown in Table IS-6, *California Greenhouse Gas Emissions by Sector*. The CARB inventory is divided into five broad sectors of economic activity: agriculture, commercial and residential, electricity generation, industrial, and transportation. Emissions are quantified in MMTCO₂e.

Table IS-6: California Greenhouse Gas Emissions by Sector

Sector	Emissions (MMT CO ₂ e)			
	1990	2000	2020	2022
Agriculture and Forestry	18.9 (4%)	30.8 (7%)	31.4 (9%)	29.8 (8%)
Commercial and Residential	44.1 (10%)	44.3 (10%)	39.0 (11%)	39.5 (11%)
Electricity Generation	110.5 (26%)	104.7 (22%)	90.6 (20%)	59.5 (16%)
High Global Warming Potential	-	6.6 (1%)	21.3 (6%)	21.3 (6%)
Industrial	105.3 (24%)	92.8 (20%)	73.6 (20%)	72.7 (20%)
Transportation	150.6 (35%)	176.7 (38%)	135.2 (37%)	139.9 (38%)
Unspecified Remaining	1.3 (<1%)	0.0 (0%)	0.0 (0%)	0.0 (0%)
Total	430.7	462.9	368.5	371.1
<i>Source: Helix, 2025; Table 6 (pg. 38)</i>				
<i>Note: MMT = million metric tons; CO₂e = carbon dioxide equivalent</i>				

As shown in Table IS-6, statewide GHG source emissions totaled 430.7 MMT CO₂e in 1990, 462.9 MMT CO₂e in 2000, 368.5 MMT CO₂e in 2020, and 371.1 MMT CO₂e in 2022.

Transportation-related emissions consistently contributed the most GHG emissions, followed by electricity generation and industrial emissions.⁹²

REGIONAL GHG INVENTORY

A GHG emissions inventory for unincorporated communities of Sacramento County was prepared as part of the County of Sacramento (County) 2024 Communitywide Climate Action Plan (2024 CAP). The 2021 baseline emissions inventory is shown below in Table IS-7,

⁸⁹ Ibid. (pg. 38)

⁹⁰ Ibid. (pg. 38)

⁹¹ Ibid. (pg. 38)

⁹² Ibid. (pg. 38)

Sacramento County Greenhouse Gas Emissions by Sector. The sectors included in this inventory differ slightly from those in the statewide inventory. Similar to statewide emissions, however, transportation-related GHG emissions (i.e., from on-road vehicles) were the largest contributor to GHG emissions in Sacramento County, comprising 44 percent of total County-wide emissions.⁹³

Table IS-7: Sacramento County Greenhouse Gas Emissions by Sector

Greenhouse Gas	Emissions (MT CO ₂ e)
	Year 2015
On-Road Vehicles	1,844,200 (44.3%)
Off-Road Vehicles	107,200 (2/6%)
Residential Building Energy	878,300 (21.1%)
Commercial/Industrial Building Energy	555,600 (13.4%)
High GWP Gases	317,800 (7.6%)
Agriculture	266,500 (6.4%)
Solid Waste	156,700 (3.8%)
Water and Wastewater	33,300 (0.8%)
Total	4,159,600
<i>Note: MT = metric tons; CO₂e = carbon dioxide equivalent</i> <i>Source: Helix, 2025; Table 7 (pg. 39)</i>	

REGULATORY SETTING

FEDERAL

FEDERAL CLEAN AIR ACT

The U.S. Supreme Court ruled on April 2, 2007, in *Massachusetts v. U.S. Environmental Protection Agency* (US EPA) that CO₂ is an air pollutant, as defined under the Federal Clean Air Act (CAA), and that the US EPA has the authority to regulate emissions of GHGs. The US EPA announced that GHGs (including CO₂, CH₄, N₂O, HFC, PFC, and SF₆) threaten the public health and welfare of the American people.⁹⁴ This action was a prerequisite to finalizing the US EPA's GHG emissions standards for light-duty vehicles, which were jointly proposed by the US EPA and the United States Department of Transportation's National Highway Traffic Safety Administration (NHTSA).

On June 30, 2022, the U.S. Supreme Court decision published in *West Virginia v. U.S. Environmental Protection Agency* overturned the US EPA's Clean Power Plan rule, which cited Section 111(d) of the CAA for authority to set limits on CO₂ emissions from existing coal- and natural-gas-fired power plants. The June 30, 2022 decision does not overturn the April 2, 2007

⁹³ Ibid. (pgs. 38 and 39)

⁹⁴ Ibid. (pg. 29)

decision; however, it may limit the US EPA's authority to develop rules limiting GHG emissions without clear congressional authorization.

Light-Duty Vehicle GHG Emission Standards and Corporate Average Fuel Economy Standards

The US EPA and the NHTSA worked together on developing a national program of regulations to reduce GHG emissions and improve fuel economy of light-duty vehicles. The US EPA established the first-ever national GHG emissions standards under the CAA, and the NHTSA established Corporate Average Fuel Economy (CAFE) standards under the Energy Policy and Conservation Act. Starting in 2010, the US EPA and NHTSA have announced a series of joint Final Rulemakings that established standards for passenger cars and light trucks commencing with 2012 model year vehicles. The latest rulemaking, announced on June 7, 2024, establishes standards that would require an industry-wide fleet average of approximately 50.4 miles per gallon in model year 2031 for passenger cars and light trucks.⁹⁵

On July 29, 2025, the Trump Administration released a proposal to rescind the Obama-era 2009 Endangerment Finding, the legal prerequisite used by the Obama and Biden Administrations to regulate GHG emissions from new motor vehicles and new motor vehicle engines. The 2009 Endangerment Finding is a fundamental nexus for defining GHG emissions as pollutants that are included in the Federal Clean Air Act. If finalized, this proposal would remove all GHG standards for light-, medium- and heavy-duty vehicles and heavy-duty engines, starting with US EPA's first GHG mandates set in 2010 for light-duty vehicles and those set in 2011 for medium-duty vehicles and heavy-duty vehicles and engines.⁹⁶

STATE

CALIFORNIA BUILDING ENERGY EFFICIENCY STANDARDS

California Code of Regulations (CCR) Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings were first established in 1978 in response to a legislative mandate to reduce California's energy consumption. Energy-efficient buildings require less electricity, natural gas, and other fuels. Electricity production from fossil fuels and on-site fuel combustion (typically for space or water heating) results in GHG emissions.

The Title 24 standards are updated approximately every three years to allow consideration and possible incorporation of new energy efficiency technologies and methods. The 2022 Title 24 standards became effective on January 1, 2023. The 2022 update to the Building Energy Efficiency Standards focused on several key areas to improve the energy efficiency of newly constructed buildings and additions and alterations to existing buildings. New for the 2022 Title 24 standards are non-residential on-site photovoltaic (solar panels) electricity generation requirements.⁹⁷

The standards are divided into three basic sets. First, there is a basic set of mandatory requirements that apply to all buildings. Second, there is a set of performance standards—the

⁹⁵ Ibid. (pg. 30)

⁹⁶ United States Environmental Protection Agency (USEPA), 2025. *EPA Releases Proposal to Rescind Obama-Era Endangerment Finding, Regulations that Paved the Way for Electric Vehicle Mandates*. Web. Released July 29, 2025. <https://www.epa.gov/newsreleases/epa-releases-proposal-rescind-obama-era-endangerment-finding-regulations-paved-way>

⁹⁷ Helix Environmental Planning, 2025 (pg. 30). *West Elkhorn ARCO ampm/Commercial Project Air Quality and Greenhouse Gas Emissions Technical Report*. March 2025.

energy budgets—that vary by climate zone (of which there are 16 in California) and building type; thus, the standards are tailored to local conditions. Finally, the third set constitutes an alternative to the performance standards, which is a set of prescriptive packages that are basically a recipe or a checklist compliance approach.

CALIFORNIA GREEN BUILDING STANDARDS CODE

The California Green Building Standards Code (CALGreen; CCR Title 24, Part 11) is a code with mandatory requirements for all nonresidential buildings (including industrial buildings) and residential buildings for which no other state agency has the authority to adopt green building standards. The 2022 Standards for new construction of, and additions and alterations to, residential and nonresidential buildings became effective on January 1, 2023.⁹⁸

CALGreen is intended to (1) cause a reduction in GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. In short, the code is established to reduce construction waste; make buildings more efficient in the use of materials and energy; and reduce environmental impact during and after construction. CALGreen contains requirements for storm water control during construction; construction waste reduction; indoor water use reduction; material selection; natural resource conservation; site irrigation conservation; and more. The code provides design options, allowing the designer to determine how best to achieve compliance for a given site or building condition. The code also requires building commissioning, which is a process that verifies all building systems, like heating and cooling equipment and lighting systems, are functioning at their maximum efficiency. CALGreen contains two levels of voluntary measures (Tier 1 and Tier 2), which go beyond minimum State code requirements. Categories of Tier 1 and Tier 2 measures include: EV designated parking; EV charging infrastructure; cool roofs; efficient outdoor lighting; dock door seals; potable water use reductions; recycled building material content; and resilient flooring.

ASSEMBLY BILL 32 – GLOBAL WARMING SOLUTIONS ACT OF 2006

The California Global Warming Solutions Act of 2006, known as AB 32, requires that CARB develop and enforce regulations for the reporting and verification of statewide GHG emissions. AB 32 directed CARB to set a GHG emission limit, based on 1990 levels, to be achieved by 2020, and established a goal to reduce GHG emissions by 80 percent under 1990 levels by 2050. The bill requires CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG emission reductions.

SENATE BILL 32

Senate Bill (SB) 32 (Amendments to the California Global Warming Solutions Action of 2006) extends California's GHG reduction programs beyond 2020. SB 32 amended the Health and Safety Code to include Section 38566, which contains language to authorize CARB to achieve a statewide GHG-emission reduction of at least 40 percent below 1990 levels by no later than December 31, 2030. SB 32 codified the targets established by Executive Order (EO) B-30-15 for 2030, which set the next interim step in the State's continuing efforts to pursue the long-term target expressed in EO B-30-15 of 80 percent below 1990 emissions levels by 2050.

⁹⁸ Ibid. (pg. 30)

ASSEMBLY BILL 1493 – VEHICULAR EMISSIONS OF GREENHOUSE GASES

AB 1493 (Pavley) required CARB to develop and adopt regulations that achieve “the maximum feasible reduction of GHGs emitted by passenger vehicles and light-duty truck and other vehicles determined by CARB to be vehicles whose primary use is noncommercial personal transportation in the State.” On September 24, 2009, CARB adopted amendments to the Pavley regulations that intend to reduce GHG emissions in new passenger vehicles from 2009 through 2016. The amendments bind California’s enforcement of AB 1493 (starting in 2009), while providing vehicle manufacturers with new compliance flexibility. In January 2012, CARB approved a new emissions-control program for model years 2017 through 2025. The program combines the control of smog, soot, and global warming gases and requirements for greater numbers of zero-emission vehicles into a single packet of standards called Advanced Clean Cars.⁹⁹

LOW CARBON FUEL STANDARD

CARB initially approved the Low Carbon Fuel Standard (LCFS) regulation in 2009, identifying it as one of the nine discrete early action measures in its original 2008 Scoping Plan to reduce California’s GHG emissions. Originally, the LCFS regulation required at least a 10% percent reduction in the carbon intensity of California’s transportation fuels by 2020 (compared to a 2010 baseline). On September 27, 2018, CARB approved changes to the LCFS regulation that require a 20% reduction in carbon intensity by 2030. These regulatory changes exceed the assumption in CARB’s 2017 Climate Change Scoping Plan, which targeted an 18% reduction in transportation fuel carbon intensity by 2030 as one of the primary measures for achieving the state’s GHG 2030 target.

SENATE BILL 100

Approved by Governor Brown on September 10, 2018, SB 100 extended the renewable electricity procurement goals and requirements of SB 350. SB 100 requires that all retail sale of electricity to California end-use customers be procured from 100 percent eligible renewable energy resources and zero-carbon resources by the end of 2045.

ASSEMBLY BILL 1279

Approved by Governor Newsom on September 16, 2022, AB 1279, the California Climate Crisis Act, declared the State’s policy of achieving net zero GHG emissions as soon as possible, but no later than 2045, and achieving and maintaining net negative GHG emissions thereafter, and to ensure that by 2045, statewide anthropogenic GHG emissions are reduced to at least 85 percent below the 1990 levels. AB 1279 anticipates achieving these policies through direct GHG emissions reductions, removal of CO₂ from the atmosphere (carbon capture), and an almost complete transition away from fossil fuels.

CALIFORNIA AIR RESOURCES BOARD: SCOPING PLAN

The Scoping Plan CARB’s strategy for achieving the goals established by AB 32, SB 32, and AB 1279, and is updated at least once every five years. It lays out the transformations needed across California’s society and economy to reduce emissions and reach climate targets. The current 2022 Scoping Plan is the third update to the original plan that was adopted in 2008. The

⁹⁹ Ibid. (pg. 32)

initial 2008 Scoping Plan laid out a path to achieve the AB 32 mandate of returning to 1990 levels of GHG emissions by 2020, a reduction of approximately 15 percent below business as usual.

On December 15, 2022, CARB approved the 2022 Scoping Plan, the 2022 Scoping Plan for Achieving Carbon Neutrality. The 2022 Scoping Plan establishes the path to achieving carbon neutrality and reducing anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279. The actions and outcomes in the plan are anticipated to achieve significant reductions in fossil fuel combustion by deploying clean technologies and fuels; further reduce SLCPs; support sustainable development; increase action on natural and working lands to reduce emissions and sequester carbon; and capture and store carbon.¹⁰⁰

LOCAL

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

SMAQMD has adopted GHG emissions standards of significance for land use development projects that lead agencies can use to determine the significance of a project's emissions in relation to the County meeting the State GHG reduction mandates for the year 2030. SMAQMD recommends a construction period GHG emissions threshold of 1,100 MTCO₂e per year. For operational period GHG emissions, SMAQMD recommends a screening level of 1,100 MTCO₂e per year. For all projects, regardless of project GHG emission levels, SMAQMD requires implementation of Tier 1 Best Management Practices (BMPs). Projects that do not implement the Tier 1 Best Management Practices are required to conduct additional calculations per SMAQMD guidance to determine excess GHG emissions and provide equivalent mitigation through either on- or off-site measures.¹⁰¹

- **BMP 1** – project shall be designed and constructed without natural gas infrastructure.
- **BMP 2** – projects shall meet the current CALGreen Tier 2 standards, except all electric vehicle spaces shall instead be electric vehicle ready.

For projects that exceed the 1,100 MTCO₂e per year operational emissions screening level, SMAQMD's guidance requires implementation of Tier 2 BMPs:¹⁰²

- **BMP 3** – residential projects shall achieve a 15 percent reduction in vehicle miles traveled per resident, office projects shall achieve a 15 percent reduction in vehicle miles traveled per worker compared to existing average vehicle miles traveled for the county, and retail projects shall achieve a no net increase in total vehicle miles traveled to show consistency with SB 743.

SMAQMD's Tier 1 and Tier 2 BMPs are consistent with the priority areas and related actions outlined in CARB's 2022 Scoping Plan Appendix D, Local Actions. Per the 2022 Scoping Plan Appendix D, local jurisdictions should focus on these three priority areas: transportation electrification, VMT reduction, and building decarbonization.¹⁰³ The 2022 Scoping Plan lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279. As described in

¹⁰⁰ Ibid. (pg. 34)

¹⁰¹ Ibid. (pg. 53)

¹⁰² Ibid. (pg. 53)

¹⁰³ Ibid. (pg. 54)

SMAQMD's justification supporting their adopted GHG thresholds, the Tier 1 and Tier 2 BMPs are set to ensure individual land use development projects contribute a fair share of the reductions required to meet the State GHG reduction mandates.¹⁰⁴

SACRAMENTO AREA COUNCIL OF GOVERNMENTS

As required by the Sustainable Communities and Climate Protection Act of 2008 (SB 375), SACOG developed the 2020 Metropolitan Transportation Plan and Sustainable Communities Strategy (MTP/SCS). This plan seeks to reduce GHG and other mobile source emissions through coordinated transportation and land use planning to reduce vehicle miles traveled (VMT).¹⁰⁵

COUNTY OF SACRAMENTO

On November 5, 2024, the County adopted the 2024 Communitywide Climate Action Plan 2024 CAP and certified the associated Subsequent EIR. The 2024 CAP provides a plan to achieve the following objectives:¹⁰⁶

- Implement the County's Final EIR for the General Plan of 2005-2030, Mitigation Measure CC-2 to prepare and adopt a CAP that reduces GHG impacts from resulting implementation of the General Plan.
- Include reasonably foreseeable projects and population growth in GHG emissions forecasts.
- Identify GHG emission reduction targets tailored to the unincorporated county and the County's government operations that align with State and County climate goals.
- Establish GHG emissions reduction measures and actions to achieve the County's GHG emissions reduction targets for communities in the unincorporated county and County operations.
- Set a framework of sufficiently adaptable long-term strategies that consider and incorporate, as appropriate, additional GHG reduction strategies that embrace continued innovation, technological advances, and creation of high-quality jobs in the county.
- Provide a mechanism for streamlining project-level GHG emissions analysis consistent with Section 15183.5 of the CEQA Guidelines.
- Develop climate adaptation measures to guide the County to a more resilient future.

SACRAMENTO MUNICIPAL UTILITY DISTRICT

In April 2021, the Sacramento Municipal Utility District (SMUD; the electricity provider for Sacramento County, including the project site) Board of Directors approved the 2030 Zero Carbon Plan to achieve a goal of carbon neutral operations and carbon-free electricity delivered to customers by 2030. The 2030 Zero Carbon Plan includes the retirement of natural gas-

¹⁰⁴ Ibid. (pg. 54)

¹⁰⁵ Ibid. (pg. 34)

¹⁰⁶ Ibid. (pg. 34)

powered generation plants, installation of utility-owned and customer-owned renewable energy generation and energy storage, and research on new technologies and business models.¹⁰⁷

IMPACT DISCUSSION

- a. *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

Less than Significant with Mitigation. The proposed project would generate GHG emissions from both short-term construction and long-term operational activities; however, as described below, these emissions would not have a significant impact on the environment.

Construction Emissions

Construction activities would generate GHG emissions associated with off-road equipment (e.g., bulldozers, tractors/loaders/backhoes, etc.) and on-road vehicle fuel combustion (e.g., from worker, vendor, and haul trips). Unlike operational emissions, that continue year after year until the project is decommissioned, construction activities would cease to emit GHG upon completion. Project construction GHG emissions were estimated using CalEEMod, as described in Section IV. Air Quality (response b) and section 4.1.1 of Appendix A. The calculated annual construction emissions for the project are shown in Table IS-8, *Construction GHG Emissions*, and compared against the SMAQMD construction GHG threshold.

Table IS-8: Construction GHG Emissions

Year / Activity	Emissions / Year (MT CO ₂ e)
	2022
2026 Project Construction	334.6
<i>SMAQMD Threshold</i>	1,100
<i>Threshold Exceeded?</i>	<i>No</i>
<i>Source: Helix, 2025; Table 20 (pg. 63)</i>	
<i>Note: MT = metric tons; CO₂e = carbon dioxide equivalent</i>	

As shown in Table IS-8, annual construction emissions for the project would not exceed the SMAQMD construction threshold. The project's construction GHG emissions would be less than significant, because they are less than the applicable SMAQMD threshold.

Operational Emissions

Once operational, the project would generate emissions from the sources described in Section IV. Air Quality (response b), as well as water/wastewater, solid waste, and refrigerants. Consistent with the methodology employed to estimate operational criteria air pollutant emissions, GHG emissions were also estimated using CalEEMod. The project's operational GHG emissions are shown in Table IS-9, *Operational GHG Emissions*, and compared against the SMAQMD operational GHG threshold.

¹⁰⁷ Ibid. (pg. 35)

Table IS-9: Operational GHG Emissions

Emission Source	Emissions / Year (MT CO ₂ e)
	2027
Mobile	4,684.6
Area	0.3
Energy	145.2
Water/Wastewater	3.3
Solid Waste	31.2
Refrigerants	136.7
Total Annual Project Emissions ^a	5,001.8
SMAQMD Threshold	1,100
Threshold Exceeded?	Yes
Notes: a. Totals may not sum due to rounding. MT = metric tons; CO ₂ e = carbon dioxide equivalent Source: Helix, 2025; Table 21 (pg. 63)	

As shown in Table IS-9, the project's operational GHG emissions would exceed the SMAQMD operational screening level of 1,100 MT CO₂e per year. The SMAQMD thresholds are designed such that all projects using the thresholds are required to implement the Tier 1 GHG reduction BMPs, regardless of the quantity of GHG emissions emitted by the project. Projects that exceed the 1,100 MT CO₂e per year operational screening level, such as the proposed project, are also required to implement the SMAQMD's Tier 2 BMPs.

The SMAQMD Tier 2 GHG reduction BMP 3 requires residential projects to achieve a 15 percent reduction in vehicle miles traveled per resident compared to existing average vehicle miles traveled for the county, and retail projects to achieve a no net increase in total vehicle miles traveled. With the update of the CEQA Statutes and Guidelines effective January 1, 2019, the guidelines for assessing transportation impacts were revised to reflect SB 743, mandating transportation impact analysis from a consideration of the project's congestion impacts to a consideration of a project's VMT impacts. In response to SB 743, the Office of Planning and Research (OPR) released the Technical Advisory on Evaluating Transportation Impacts in CEQA to assist CEQA practitioners with the implementation. The technical advisory contains the following recommendations for the transportation analysis of retail development projects:¹⁰⁸

Because new retail development typically redistributes shopping trips rather than creating new trips, estimating the total change in VMT (i.e., the difference in total VMT in the area affected with and without the project) is the best way to analyze a retail project's transportation impacts.

By adding retail opportunities into the urban fabric and thereby improving retail destination proximity, local-serving retail development tends to shorten trips and reduce

¹⁰⁸ Ibid. (pg. 64)

VMT. Thus, lead agencies generally may presume such development creates a less-than-significant transportation impact. Regional-serving retail development, on the other hand, which can lead to substitution of longer trips for shorter ones, may tend to have a significant impact.

Initially adopted on October 6, 2020, and last updated on January 13, 2025, the County's Transportation Analysis Guidelines (TAG) largely mirror the land use thresholds and VMT reductions recommended by OPR to demonstrate consistency with SB 743.¹⁰⁹ The TAG provide two sub-categories for retail development; local-serving retail and regional (non-locally serving) retail. Retail projects that meet the following criteria are categorized as "locally serving." Projects that do not meet the following criteria are regional (non-locally serving) retail.

- Local Serving: Project does not have regional-serving uses, as shown in Appendix A of the TAG; and
- Land Use Size:
 - 125,000 square feet of total gross floor area or less in an infill setting; or
 - 200,000 square feet of total gross floor area or less in a greenfield setting; or
 - If supported by a market study with a capture area of 3 miles or less.

The proposed project, consisting of a convenience store, retail space, gas station, car wash, and two quick service restaurants, includes a total of approximately 15,008 SF of building space (including the car wash tunnel). The project site is and is located within a swath of rural residential properties, is less than 125,000 SF, would be considered local serving, and would not result in regional increases in VMT. Therefore, the project would meet the criteria specified in SMAQMD's Tier 2 GHG reduction BMP 3. In addition, as shown in Table IS-9, the largest source of GHG emissions for the project would be from mobile sources (project-related, on-road traffic emissions), which were calculated in CalEEMod to be approximately 4,685 MTCO₂e (approximately 94 percent of project GHG emissions). Because the project would not result in an increase in regional VMT, the mobile source GHG emissions generated by the project would not be new to the region—the emissions would be a redistribution of existing mobile source GHG emissions.

The project's operational GHG emissions would exceed SMAQMD's operational threshold of significance of 1,100 MTCO₂e. Project operational GHG emissions would exceed SMAQMD's screening level of 1,100 MTCO₂e threshold. SMAQMD's significance thresholds are structured such that all land use development projects are required to implement the Tier 1 GHG reduction BMPs, regardless of whether a project's emissions are above or below the 1,100 MTCO₂e threshold. SMAQMD's additional Tier 2 GHG BMPs are not required, because the project would meet the VMT requirements outlined in SMAQMD Tier 2 GHG reduction BMP 3. Mitigation Measure GHG-1 has been incorporated into the project to ensure project compliance with the applicable design requirements outlined in SMAQMD Tier 1 GHG reduction BMPs 1 and 2.

¹⁰⁹ County of Sacramento.

With incorporation of Mitigation Measure GHG-1, the project would not generate GHG emissions, either directly or indirectly, that have a significant impact on the environment. The impact would be less than significant with mitigation incorporated.

- b. *Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Less than Significant. There are numerous State plans, policies, and regulations adopted for the purpose of reducing GHG emissions. The principal overall State plan and policy is AB 32, the California Global Warming Solutions Act of 2006. The quantitative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020. SB 32 would require further reductions of 40 percent below 1990 levels by 2030. Because the project's anticipated operational year would be after 2020 but before 2030, the project aims to reach the 2030 GHG reductions quantitative goals set by SB 32 and contribute a fair share of statewide progress towards the State's net zero carbon emissions by 2045 mandate. Statewide plans and regulations such as GHG emissions standards for vehicles (AB 1493), the LCFS, and regulations requiring an increasing fraction of electricity to be generated from renewable sources are being implemented at the statewide level; as such, compliance at the project level is not addressed. Therefore, the proposed project would not conflict with those plans and regulations.

The SACOG 2020 MTP/SCS relies on growth forecasts from local planning documents such as the County General Plan. The project site has a General Plan Land Use designation of AG-RES. The project would require a General Plan amendment to change the land use designation to allow commercial uses. However, the project does not have a residential component and would not result in population growth in the county. Because the project's commercial (local serving retail) land uses would not result in an increase in regional VMT, the project's contribution to growth in the county would not conflict with the growth projections used to develop the 2020 MTP/SCS.

The GHG inventories and reduction target in the County's 2024 CAP are based on growth projections assuming buildout consistent with the General Plan's land use designations. The project would not include a residential component and would not result in population growth in the County. The project is not eligible for streamlining of the GHG analysis using the County's CAP Checklist, because the project would require a General Plan amendment to change the project site land use designation. The project would be considered local serving retail, which tends to shorten trips, reduce VMT, and would reduce mobile source GHG emissions.¹¹⁰ In addition, the project would: 1) be all electric (enforced by mitigation measure GHG-1, above), 2) install EV charging infrastructure in accordance with CALGreen Tier 2 measures (enforced by mitigation measure GHG-1, above), 3) install solar panels in accordance with Title 24 Part 6 building energy efficiency requirements, and 4) comply with all CALGreen requirements and County regulations for water efficiency, solid waste diversion, and tree planting. Therefore, the project would support the County 2024 CAP goals for VMT reduction, EV charging infrastructure, building energy decarbonization, solid waste diversion, and water efficiency. The project would not conflict with the County's 2024 CAP.

The project would not result in increased VMT in the County; the project's retail land uses would be considered local serving and not result in new VMT in the region (or the associated mobile source GHG emissions). The project would support state and local GHG reduction plan goals for VMT reduction, building energy decarbonization, and EV parking infrastructure.

¹¹⁰ Ibid. (pg. 66)

Therefore, the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. This impact would be less than significant.

ENVIRONMENTAL MITIGATION MEASURES

MITIGATION MEASURE GHG-1: SMAQMD TIER 1 BEST MANAGEMENT PRACTICES FOR GHG EMISSION REDUCTIONS

The project shall implement the SMAQMD Tier 1 GHG Reduction Best Management Practices (BMPs) or implement equivalent alternate mitigation approved by the County. Prior to issuing each project building permit, the County shall verify that project documentation includes the following BMPs:

- **SMAQMD Tier 1 BMP 1.** The project building shall be designed and constructed without natural gas infrastructure.
- **SMAQMD Tier 1 BMP 2.** The project shall meet the current CALGreen Tier 2 standards at the time of project construction, except the minimum number of electric vehicle capable spaces shall instead be electric vehicle ready, defined below:
 - Electric vehicle capable means that a raceway (the enclosed conduit that forms the physical pathway for electrical wiring to protect it from damage) and adequate panel capacity to accommodate future installation of a dedicated branch circuit and charging station(s) has been installed.
 - Electric vehicle ready means that all electric vehicle capable features have been installed and a dedicated branch circuit(s) (electrical pre-wiring), circuit breakers, and other electrical components, including a receptacle (240-volt outlet) or junction box, needed to support future charging stations(s) have been installed.

X. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
f. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

ENVIRONMENTAL SETTING

The 4.14-acre project site is undeveloped, surrounded by agricultural-residential and suburban land uses. The proposed project is located within a quarter mile of Westside Elementary School at 6537 West 2nd Street, approximately 350 feet (0.07 mile) northeast of the project site. The proposed project area is not located in a fire hazard severity zone, as determined by the California Department of Forestry and Fire Protection (CAL FIRE).¹¹¹

The State Water Resources Control Board (SWRCB) GeoTracker¹¹² and the Department of Toxic Substances Control (DTSC) EnviroStor¹¹³ databases were reviewed to identify potential hazardous materials sites in the proposed project vicinity. The databases indicate that there are

¹¹¹ California Department of Forestry and Fire Protection, 2025. *Local Responsibility Area Fire Hazard Severity Zones, Sacramento County – Unincorporated LRA*, March 10, 2025. Available at: <https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones>. Accessed July 21, 2025.

¹¹² California State Water Resources Control Board, 2025. *Geotracker*. Available at: <https://geotracker.waterboards.ca.gov/>. Accessed July 21, 2025.

¹¹³ California Department of Toxic Substances Control Board, 2025. *EnviroStor*. Available at: <https://www.envirostor.dtsc.ca.gov/public/>. Accessed July 21, 2025.

no known active hazardous materials sites, Cleanup Program Sites, or Leaking Underground Storage Tanks (LUSTs) within 1,000 feet of the project site. Furthermore, the DTSC maintains the Hazardous Waste and Substances Site (Cortese) List, a planning document used by agencies and developers to comply with CEQA requirements. The project site is not included on the Cortese List.¹¹⁴

REGULATORY SETTING

STATE

UNIFIED HAZARDOUS WASTE AND HAZARDOUS MATERIALS MANAGEMENT REGULATORY PROGRAM (UNIFIED PROGRAM); CUPA (HEALTH AND SAFETY CODE SECTIONS 25404 ET SEQ)

The California Environmental Protection Agency (Cal EPA) adopted regulations in January 1996 that implemented the Unified Program at the local level. The agency responsible for implementation of the Unified Program is called the Certified Unified Program Agency (CUPA). The Sacramento County Environmental Management Department (EMD) has been designated by the Cal EPA as the CUPA for Sacramento County. As the CUPA, the Environmental Compliance Division is responsible for the implementation of six statewide environmental programs for Sacramento County, including underground storage of hazardous substances. Program implementation involves permitting and inspection of regulated facilities, providing educational guidance and notice of changing requirements stipulated in State or Federal laws and regulations, investigations of complaints regarding spills or unauthorized releases and administrative enforcement actions levied against facilities that have violated applicable laws and regulations. Fuel station operators are required to submit an application for permits to install, upgrade, repair, or remove underground storage tanks (USTs) to County EMD. The CUPA also coordinates with State and Federal agencies during the remediation process, when protective measures fail and a release occurs.

In the State of California, Section 65962.5 of the Government Code requires that the California Department of Toxic Substances Control (DTSC), the California Department of Public Health, and the State Water Resources Control Board (SWRCB) compile lists of all hazardous waste facilities subject to corrective action, sites included in the Abandoned Site Assessment Program, drinking water wells that contain detectable levels of organic contaminants, underground storage tanks with unauthorized releases, and solid waste disposal sites, cleanup sites, and the like. Locations of potential toxic substances and contamination in California are identified by the DTSC and the SWRCB. According to the DTSC and SWRCB databases, the project site is not identified as a hazardous materials cleanup site, nor are there any hazardous materials cleanup sites located adjacent to the project site.

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

¹¹⁴ California Department of Toxic Substances Control Board, 2025. *Hazardous Waste and Substances Site List (Cortese)*. Available at: https://www.envirostor.dtsc.ca.gov/public/search?cmd=search&report_type=CORTESE&site_type=CSITES,%E2%80%8CFUDS&status=ACT,BKLG,COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+%E2%80%8C%28CORTESE%29. Accessed July 21, 2025.

UNDERGROUND STORAGE TANK DESIGN STANDARDS

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

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

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

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

- Tank and piping completely made of noncorrosive material, such as fiberglass-reinforced plastic.
- Tank and piping made of steel having a corrosion-resistant coating and having cathode protection.
- Tank made of steel clad with a thick layer of noncorrosive material (this option does not apply to piping).
- Tank and piping are installed without additional corrosion protection measures provided that a corrosion expert has determined that the site is not corrosive enough to cause a release due to corrosion during its operating life and owner/operators maintain records that demonstrate compliance with this requirement.
- Tank and piping construction and corrosion protection are determined by the implementing agency to be designed to prevent the release or threatened release of any stored, regulated substance in a manner that is no less protective of human health and the environment than the options listed above.¹¹⁵

UST systems must also be designed, constructed, and installed in accordance with a national code of practice and according to manufacturer's instructions. Furthermore, all regulated tanks

¹¹⁵ United States Environmental Protection Agency, 2025. *Release Prevention for Underground Storage Tanks (USTs)*. Available at: <https://www.epa.gov/ust/release-prevention-underground-storage-tanks-usts>. Accessed July 24, 2025.

and piping must have release detection so that leaks are discovered quickly before contamination spreads from the UST site. Every UST system must include release detection (often also called "leak" detection) that meets three basic requirements:

1. Leaks can be detected from any portion of the tank or its piping that routinely contains petroleum;
2. Leak detection is installed, calibrated, operated, and maintained in accordance with the manufacturer's instructions; and
3. Leak detection meets the performance requirements described in the federal regulations.¹¹⁶

CALIFORNIA FIRE CODE, TITLE 24, CHAPTER 9, CALIFORNIA CODE OF REGULATIONS AND CALIFORNIA BUILDING CODE, PART 2

The California Fire Code regulates the storage and handling of hazardous materials, including the requirement for secondary containment, separation of incompatible materials, and preparation of spill response procedures.

CALIFORNIA HAZARDOUS MATERIALS RELEASE RESPONSE PLAN AND INVENTORY LAW OF 1985; CUPA

The California Hazardous Materials Release Response Plan and Inventory Law of 1985 (Business Plan Act) requires that businesses that store hazardous materials onsite prepare a Hazardous Materials Business Plan (HMBP) and submit it to the local CUPA.

CALIFORNIA HAZARDOUS WASTE CONTROL ACT; CALIFORNIA HEALTH AND SAFETY CODE, DIVISION 20, CHAPTER 6.5, ARTICLE 2, SECTION 25100, ET SEQ.; DTSC

Under the California Hazardous Waste Control Act, DTSC regulates the generation, transportation, treatment, storage, and disposal of hazardous waste in California. The hazardous waste regulations establish criteria for identifying, packaging, and labeling hazardous wastes; dictate the management of hazardous waste; establish permit requirements for hazardous waste treatment, storage, disposal, and transportation; and identify hazardous wastes that cannot be disposed of in landfills. DTSC is also the administering agency for the California Hazardous Substance Account Act. California Health and Safety Code, Division 20, Chapter 6.8, Sections 25300 et seq., also known as the State Superfund law, providing for the investigation and remediation of hazardous substances pursuant to State law.

TITLES 13, 22, AND 26 OF THE CALIFORNIA CODE OF REGULATIONS

Regulates the transportation of hazardous waste originating in and passing through the state, including requirements for shipping, containers, and labeling.

¹¹⁶ United States Environmental Protection Agency, 2025. *Release Detection for Underground Storage Tanks (USTs) - Introduction*. Available at: <https://www.epa.gov/ust/release-detection-underground-storage-tanks-usts-introduction#tankmethods>. Accessed July 24, 2025.

CAL/OSHA REGULATIONS (TITLE 8 CCR)

Cal/OSHA has primary responsibility for developing and enforcing workplace safety regulations in California. Because California has a federally approved OSHA program, it is required to adopt regulations that are at least as stringent as those found in Title 29 of the Code of Federal Regulations (CFR). Cal/OSHA standards are generally more stringent than federal regulations, requiring employee safety training, safety equipment, accident and illness prevention programs, hazardous substance exposure warnings, and emergency action and fire prevention plan preparation.

CONSTRUCTION STORM WATER GENERAL PERMIT (CONSTRUCTION GENERAL PERMIT; ORDER 2022-0057-DWQ, NPDES No. CAS000002)

Dischargers whose project disturbs one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit; Order 2022-0057-DWQ, NPDES No. CAS000002). Construction activity subject to this permit includes clearing, grading, grubbing, and other disturbances to the ground such as excavation and stockpiling, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of a facility. The Construction General Permit requires the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) that includes specific Best Management Practices (BMPs) designed to prevent sediment and pollutants from contacting stormwater from moving offsite into receiving waters. The BMPs fall into several categories, including erosion control, sediment control, waste management and good housekeeping, and are intended to protect surface water quality by preventing the off-site migration of eroded soil and construction-related pollutants from the construction area.

CALIFORNIA CODE OF REGULATIONS SECTION 4216-4216.9

Sections 4216 through 4216.9 of the California Code of Regulations, "Protection of Underground Infrastructure," require an excavator to contact a regional notification center (e.g., USA North 811) at least two working days prior to excavation of any subsurface installations. Any utility provider or contractor seeking to begin work that could damage underground infrastructure can call USA North 811, the regional notification center for northern California. USA North 811 will notify the utilities that may have buried lines within the delineated work area. Representatives of the utilities are then notified and are required to mark the specific location of their facilities within the work area prior to the start of project activities.

LOCAL

SACRAMENTO COUNTY ENVIRONMENTAL MANAGEMENT DEPARTMENT (EMD)

The Hazardous Materials Division of the Sacramento County Environmental Management Department (EMD) has been designated by the California Environmental Protection Agency (Cal EPA) as the Certified Unified Program Agency (CUPA) for Sacramento County. As the CUPA, the Environmental Compliance Division is responsible for the implementation of six (6) statewide environmental programs for Sacramento County, including underground storage of hazardous substances. Program implementation involves permitting and inspection of regulated facilities, providing educational guidance and notice of changing requirements stipulated in State or Federal laws and regulations, investigations of complaints regarding spills or unauthorized

releases and administrative enforcement actions levied against facilities that have violated applicable laws and regulations. Fuel station operators are required to submit an application for permits to install, upgrade, repair, or remove underground storage tanks (USTs) to County EMD. The CUPA also coordinates with State and Federal agencies during the remediation process, when protective measures fail and a release occurs.

IMPACT DISCUSSION

- a. *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

Construction

Less than Significant. During construction, equipment and materials would require the use of hazardous materials such as fuels, oils and lubricants, solvents and cleaners, cements and adhesives, paints and thinners, degreasers, and asphalt mixtures, all of which are commonly used in construction. The routine use or accidental spill of such materials could result in exposures or inadvertent releases, affecting construction workers, the public, or the environment. However, construction activities are subject to numerous state, federal, and local regulations governing the transport, use, storage, and disposal of hazardous materials. These regulations include driver-training, load labeling, and container requirements intended to minimize the risk of an accidental release during the transportation. Adherence to all applicable local, state, and federal hazardous material regulations would reduce the potential for hazardous conditions during construction. Therefore, the impacts would be less than significant.

Operation

Less than Significant. The proposed project would include the installation of underground fuel storage tanks (USTs), which are regulated by local, state, and federal hazardous materials programs. Current tank design standards and regulatory oversight substantially reduce the potential for soil and groundwater contamination compared to older systems. If a release does occur, standard remediation procedures would be implemented to assess and clean up contamination. With compliance to applicable regulations and oversight, the likelihood of a serious release is very low, and impacts would be less than significant.

Businesses that handle hazardous materials are subject to the Hazardous Material Business Plan Program (HMBP), administered locally by Sacramento County EMD as part of the CUPA. The HMBP program requires documentation of hazardous materials inventories, emergency response procedures, and employee training. These plans provide safeguards to protect public health, groundwater and the environment in the event of a release. With compliance, the proposed project would not expose people or structures to significant hazards, and impacts would be less than significant.

- b. *Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

Less than Significant. As detailed in criteria a, above, the regulatory oversight of USTs, the rigorous tank design standards, and required practices and established remediation programs would minimize the potential of the release of hazardous materials into the environment.

Therefore, impacts related to the accidental release of hazardous materials into the environment would be less than significant.

- c. *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

Less than Significant. The project site is in an agricultural-residential area, adjacent to a suburban neighborhood near several schools, including Westside Elementary School (0.07 mile northeast) and Heritage Peak Charter School (0.96-mile northwest). The Sacramento Metropolitan Air Quality Management District (SMAQMD) does not have any regulations requiring a minimum distance between sensitive receptors (e.g., schools, residences) and gasoline dispensing facilities. However, the California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective* (2005) recommends avoiding the siting of new sensitive land uses within 300 feet of a large gas station (defined as a facility with a throughput of 3.6-million gallons or greater of fuel per year).¹¹⁷ The CARB Handbook recommends a 50-foot separation for typical gas dispensing facilities. Based on the planned station size and expected operations, the project would operate below CARB's "large station" threshold of 3.6 million gallons per year and would therefore be considered a typical dispensing facility. Based on the site plan, the fueling area would be located more than 50 feet from existing sensitive receptors, and this setback would also accommodate potential future residential development on adjacent vacant parcels. Although the proposed project would be located within one-quarter mile of a school, no regulations prohibit such siting, and compliance with applicable hazardous materials and air quality regulations would ensure a less than significant impact.

Additionally, grading and construction permits would require adherence to best management practices (BMPs) for hazardous materials handling, spill prevention, and cleanup, as established in the associated SWPPP. Therefore, impacts related to hazardous emissions or materials near schools would be less than significant.

- d. *Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

No Impact. As discussed in the Environmental Setting, the project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (the "Cortese List"). Therefore, the proposed project would not create a significant hazard to the public or the environment as a result of being located on a hazardous materials site and no impact would occur.

- e. *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

Less than Significant. Sacramento County adopted its most recent Area Plan for Emergency Response to Hazardous Materials Incidents in 2022 and its Local Hazard Mitigation Plan in 2021. The proposed project would not interfere with any known emergency response or evacuation plan. During construction, temporary lane closures may be needed to

¹¹⁷ California Air Resources Board, 2005. *Air Resources Board Approves Land Use Planning Handbook*. Available at: https://ww2.arb.ca.gov/news/air-resources-board-approves-land-use-planning-handbook#:~:text=Key%20recommendations%20in%20the%20handbook%20include:%20*,300%20feet%20of%20a%20large%20gas%20station. Accessed July 24, 2025.

accommodate construction equipment access, but these would be temporary and would not physically interfere with emergency response or emergency evacuation plans. Additionally, the proposed project would be required to comply with applicable access and circulation requirements of the County Improvement Standards and the Uniform Fire Code. Compliance with the Area Plan and regulations would ensure that impacts are less than significant.

- f. *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*

Less than Significant. The project site is not located within or near a State or Local Very High Fire Hazard Severity Zone (VHFHSZ) as mapped by CAL FIRE. The project site is within the Local Responsibility Area (LRA) for Sacramento County.¹¹⁸ The proposed project would develop the site with urbanized uses and would implement vegetation management practices which would minimize any potential fire hazards during construction. Furthermore, the project would be constructed in accordance with applicable fire codes, including the California Building Code (CBC) and regulations of the Sacramento Metropolitan Fire District. Therefore, impacts related to wildland fire hazards would be less than significant.

ENVIRONMENTAL MITIGATION MEASURES

None recommended.

¹¹⁸ California Department of Forestry and Fire Protection, 2025. *Local Responsibility Area Fire Hazard Severity Zones, Sacramento County – Unincorporated LRA*, March 10, 2025. Available at: <https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones>. Accessed July 21, 2025.

XI. HYDROLOGY AND WATER QUALITY

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. result in a substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv. impede or redirect flood flows?	☐	☐	☒	☐
d. Develop in an area that is subject to 200-year urban levels of flood protection (ULOP)?	☐	☐	☒	☐
e. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
f. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

ENVIRONMENTAL SETTING**REGIONAL HYDROLOGY**

The project area is in an agricultural-residential area with nearby suburban uses within the Sacramento River Basin. The Sacramento River Basin consists of approximately 27,000 square miles bounded by the Cascade Range and Trinity Mountains to the north, the Sacramento-San Joaquin Delta to the southwest, the Sierra Nevada to the east, and the Coast Ranges to

the west.¹¹⁹ The project area is located within the Bear River watershed of the American River subregion.¹²⁰

FLOODING

According to the Federal Emergency Management Agency (FEMA) National Flood Hazard Layer, the project site is within Zone X (unshaded).¹²¹ Zone X (unshaded) is defined as a minimal flood hazard area, located outside the 500-year floodplain and protected from the 100-year flood by levees.¹²²

GROUNDWATER

The Rio Linda/Elverta Community of Sacramento County is within the 351,000-acre North American Subbasin of the Sacramento Valley Groundwater Basin. The subbasin is bounded by the Bear River to the north, the Feather River to the west, the Sacramento River to the south, and a north-south line extending from the Bear River south to Folsom Lake to the east.¹²³

A Groundwater Sustainability Plan (GSP) for the North American Subbasin was prepared and submitted to the California Department of Water Resources (DWR) in January 2022 and approved July 2023. As required by the Sustainable Groundwater Management Act (SGMA), the GSP includes, among other things, the subbasin setting, a hydrogeological conceptual model, a comprehensive water budget, a basin-wide monitoring network, sustainable management criteria, and projects and management actions necessary to ensure the subbasin's sustainability. Modeling conducted for the GSP, including the projected conditions water budget scenario indicates that the North American Subbasin is projected to remain sustainable under future growth, but deficits are anticipated when climate change impacts are factored into growth scenarios. The GSP identifies two specific projects and five management actions. The projects include a conjunctive use project that can resolve the deficit and has a net benefit of reducing groundwater pumping by 5,000 (acre-feet per year) AFY and improving flood protection and habitat for aquatic species in the Natomas Cross Canal. The management actions include (1) continuing development of the Sacramento Regional Water Bank; (2) exploring revisions to well permitting programs in Placer, Sacramento, and Sutter counties and the City of Roseville; (3) coordinating with land use agencies on development approvals; (4) improving data collection and communication with domestic and shallow well owners; and (5) continuing monitoring of groundwater dependent ecosystems.¹²⁴

¹¹⁹ Rivers for Change, 2014. *Sacramento River Watershed*. Available at: <https://riversforchange.org/sacramento-river-watershed/>. Accessed July 24, 2025.

¹²⁰ Sacramento River Watershed Program, 2025. *American River Subregion*. Available at: <https://sacriver.org/explore-watersheds/american-river-subregion/>. Accessed July 24, 2025.

¹²¹ Federal Emergency Management Area (FEMA), 2025. *National Flood Hazard Layer (NFHL) Viewer*. Available at: <https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd>. Accessed July 24, 2025.

¹²² FEMA, 2023. *Zone X or X (Unshaded)*. Available at: <https://www.fema.gov/about/glossary/zone-c-or-x-unshaded>. Accessed July 24, 2025.

¹²³ California Department of Water Resources, 2006. *Sacramento Valley Groundwater Basin – North American Subbasin Bulletin 118*. Available at: https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Bulletin-118/Files/2003-Basin-Descriptions/5_021_64_NorthAmericanSubbasin.pdf. Accessed July 24, 2025.

¹²⁴ Sacramento Groundwater Authority GSA, 2021. *North American Subbasin Groundwater Sustainability Plan*. Available at: <https://nasbgroundwater.org/gsp/>. Accessed July 24, 2025.

Generally, the quality of groundwater in the North American Subbasin is suitable for nearly all uses, with the exception of contamination plumes and localized, naturally-occurring and human-caused quality issues, which may affect the supply, beneficial uses, and potential management of groundwater in the North American Subbasin. A Groundwater Quality Vulnerability Assessment of the Sacramento Groundwater Authority portion of the North American Subbasin identified seven elements (arsenic, chromium (total and hexavalent), iron, manganese, nitrate, total dissolved solids, and radon) that provide a general condition of the groundwater quality. The GSP evaluates six of these seven elements (not including radon) and found the concentrations suitable for drinking water, with most results below the secondary and primary drinking water standards. However, about 15 percent of the wells had arsenic and manganese above their respective maximum contaminant levels.¹²⁵

STORMWATER AND DRAINAGE

A Level 3 Drainage Study (drainage study) was prepared for the proposed project by Core States Group on March 18, 2026, in accordance with the Sacramento City/County Drainage Manual (Volume 2), the County of Sacramento Improvement Standards (Section 9), and the most recent version of the Stormwater Quality Design Manual for the Sacramento Region. The drainage study demonstrates compliance with Low Impact Development (LID) requirements including site-specific stormwater quality treatment strategies, evaluates hydromodification, analyzes peak flows for the 100-year storm event, designs the site's connection to the public trunk main storm drain system, and addresses source control measures. The drainage study includes the required hydrologic and hydraulic modeling, drainage design calculations, and stormwater quality documentation consistent with the technical detail required for Level 3 drainage studies.

REGULATORY SETTING

FEDERAL

CLEAN WATER ACT

The federal Clean Water Act (CWA) and subsequent amendments, under the enforcement authority of the U.S. Environmental Protection Agency (US EPA), was enacted “to restore and maintain the chemical, physical, and biological integrity of the Nation’s waters.” The purpose of the CWA is to protect and maintain the quality and integrity of the nation’s waters by requiring states to develop and implement state water plans and policies. The CWA gave US EPA the authority to implement pollution control programs such as setting wastewater standards for industry. In California, implementation and enforcement of the National Pollutant Discharge Elimination System (NPDES) program is conducted through the California State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards (RWQCBs). The CWA also sets water quality standards for surface waters and established the NPDES program to protect water quality through various sections of the CWA, including Sections 401 through 404 and 303(d) that are implemented and regulated by the SWRCB and the nine RWQCBs.

¹²⁵ Ibid.

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT

The NPDES permit system was established in the CWA to regulate municipal and industrial point discharges to surface waters of the U.S. Each NPDES permit for point discharges contains limits on allowable concentrations of pollutants contained in discharges. Section 402 of the CWA contains general requirements regarding NPDES permits.

The CWA was amended in 1987 to require NPDES permits for non-point 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 NPDES stormwater regulations is to improve the quality of stormwater discharged to receiving waters to the “maximum extent practicable” through the use of structural and non-structural Best Management Practices (BMPs). BMPs can include the development and implementation of various practices including educational measures (workshops informing the public of what impacts result when household chemicals are dumped into storm drains), regulatory measures (local authority of drainage facility design), public policy measures, and structural measures (filter strips, grass swales and detention ponds). The NPDES permits that apply to the proposed project are described below.

NATIONAL FLOOD INSURANCE PROGRAM

Under Executive Order 11988, FEMA requires that local governments covered by the federal flood insurance program pass and enforce a floodplain management ordinance that specifies minimum requirements for any construction within the 100-year floodplain. Through its Flood Insurance and Mitigation Administration, FEMA manages the National Flood Insurance Program, which includes flood insurance, floodplain management, and flood hazard mapping functions. FEMA determines flood elevations and floodplain boundaries and distributes the flood insurance rate maps used in the National Flood Insurance Program. These maps identify the locations of special flood hazard areas, including 100-year floodplains (i.e., areas that would have a 1 percent annual chance of flooding).

Federal regulations governing development in a floodplain are set forth in Title 44, Part 60 of the Code of Federal Regulations. Those regulations enable FEMA to require municipalities participating in the National Flood Insurance Program to adopt certain flood hazard reduction standards for construction and development in 100-year floodplains.

STATE

PORTER-COLOGNE WATER QUALITY CONTROL ACT

The Porter-Cologne Act delegates authority to the State Water Resources Control Board (SWRCB) to establish regional water quality control boards. The Porter-Cologne Water Quality Control Act (Water Code Section 13000 et seq.) is the primary water quality control law in California. The Porter-Cologne Act established the SWRCB and divided the State into nine regional basins, each overseen by a RWQCB. The nine RWQCBs have the primary responsibility for the coordination and control of water quality within their respective jurisdictional boundaries. The Central Valley RWQCB has authority to use planning, permitting, and enforcement to protect beneficial uses of water resources in the project region. Under the Porter-Cologne Water Quality Control Act (California Water Code Sections 13000- 14290), the RWQCB is authorized to regulate the discharge of waste that could affect the quality of the state’s waters, including projects that do not require a federal permit through the USACE. To

meet RWQCB 401 Certification standards, all hydrologic issues related to a project must be addressed, including the following:

- Wetlands
- Watershed hydrograph modification
- Proposed creek or riverine related modifications
- Long-term post-construction water quality

NPDES CONSTRUCTION GENERAL PERMIT

Project construction would be subject to the National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order 2022-0057-DWQ, NPDES No. CAS000002), commonly referred to as the Construction General Permit. The Construction General Permit regulates discharges of sediment and other pollutants in stormwater associated with construction activity to waters of the United States from construction sites that disturb 1 acre or more of land surface, or that are part of a common plan of development or sale that disturbs more than 1 acre of land surface. The permit regulates stormwater discharges associated with construction or demolition activities, such as clearing and excavation; construction of buildings; and linear underground projects, including installation of water pipelines and other utility lines.

The Construction General Permit requires the development and implementation of a SWPPP that includes specific BMPs designed to prevent sediment and other pollutants from contacting stormwater from moving off-site into receiving waters. The BMPs fall into several categories, including erosion control, sediment control, waste management, and good housekeeping and are intended to protect surface water quality by preventing eroded soil and construction-related pollutants from migrating off-site. The Construction General Permit requires routine inspection of all BMPs. Additionally, the SWPPP must contain a visual monitoring program, a chemical monitoring program for non-visible pollutants, and a sediment monitoring plan if the site discharges directly to a water body listed on the CWA Section 303(d) list for sediment. The SWPPP must be prepared before construction begins. The SWPPP must list BMPs and the placement of those BMPs that the applicant would use to protect stormwater runoff. Examples of typical construction BMPs include scheduling or limiting certain activities to dry periods, installing sediment barriers such as a silt fence and fiber rolls, and maintaining equipment and vehicles used for construction. Non-stormwater management measures include installing specific discharge controls during certain activities, such as paving operations and vehicle and equipment washing and fueling. The Construction General Permit also sets post-construction standards (i.e., implementation of BMPs to reduce pollutants in stormwater discharges from the site after construction).

SUSTAINABLE GROUNDWATER MANAGEMENT ACT

The Sustainable Groundwater Management Act (SGMA) of 2014, effective January 1, 2015, authorizes local agencies to manage groundwater in a sustainable manner and allows limited state intervention when necessary to protect groundwater resources. SGMA defined “sustainable groundwater management,” established a framework for local agencies to develop plans, and implement strategies to sustainably manage groundwater resources, established basin prioritization (ranked from very low to high priority), and set a 20-year timeline for implementation. Basins are prioritized under the SGMA by DWR.

In January 2016, Sacramento Groundwater Authority (SGA) became the exclusive Groundwater Sustainability Agency (GSA) for its portion of the North American Subbasin. SGA is essential for implementing the groundwater management element of the historic 2000 Water Forum Agreement. A centerpiece of the agreement is a regional program to manage and conjunctively use groundwater and surface water to help meet water needs through the year 2030, while reducing diversions from the lower American River during environmentally sensitive times. The five GSAs in the North American Subbasin collaboratively developed a GSP to guide the sustainable management of groundwater in the North American subbasin and submitted the final GSP to DWR in January 2022 and the GSP was approved in July 2023.¹²⁶

LOCAL

SACRAMENTO COUNTY STORMWATER COMPLIANCE PROGRAM

The Environmental Management Department's (EMD) Commercial/Industrial Stormwater Compliance Program regulates certain types of businesses throughout Sacramento County and all its incorporated cities except Isleton. The purpose of the program is to ensure compliance with Sacramento County Code (SCC 15.12) and applicable codes which prohibit non-storm water discharge to the County's storm drainage system and local waters. EMD provides regulatory oversight in the management of commercial/industrial stormwater discharges including: preventing the discharge of pollutants into the storm drainage systems; eliminating, or significantly reducing outdoor pollutant sources that are likely to be washed into the storm drain system upon contact with rainfall; eliminating illicit connections to the storm drainage systems; and triennial inspections of commercial/industrial facilities to ensure compliance with stormwater discharge requirements.

SACRAMENTO COUNTY WATER QUALITY: EROSION AND GRADING AND STORMWATER

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

The County has established a Stormwater Ordinance (Sacramento County Code 15.12). The Stormwater Ordinance prohibits the discharge of unauthorized non-stormwater to the County's stormwater conveyance system and local creeks. It applies to all private and public projects in the County, regardless of size or land use type. In addition, Sacramento County Code 16.44 (Land Grading and Erosion Control) requires private construction sites disturbing one (1) or more acres or moving 350-cubic yards or more of earthen material to obtain a grading permit. To obtain a grading permit, project proponents must prepare and submit for approval an Erosion and Sediment Control (ESC) Plan describing erosion and sediment control BMPs that will be implemented during construction to prevent sediment from leaving the site and entering the County's storm drain system or local receiving waters. Construction projects not subject to SCC 16.44 are subject to the Stormwater Ordinance (SCC 15.12) described above.

¹²⁶ Sacramento County, 2025. *Sustainable Groundwater Management Act*. Available at: <https://waterresources.saccounty.gov/Pages/Ground-Water-Management.aspx>. Accessed July 28, 2025.

IMPACT DISCUSSION

- a. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

Less than Significant. The project site contains six potentially jurisdictional aquatic features, including one wetland swale and five seasonal wetlands. Construction of the proposed project is expected to permanently impact approximately 0.041 acre (1,785.96 square feet) of U.S. Army Corps of Engineers (USACE) jurisdictional waters and approximately 0.251 acre (10,933.56 square feet) of State Water Resources Control Board (SWRCB)/Regional Water Quality Control Board (RWQCB) jurisdictional waters. One of the wetland swales (WS-1) shows potential downstream surface connection to other potentially jurisdictional waterbodies. None of the other wetlands present within the survey area are directly connected or adjacent to a stream, river, or lake and therefore are likely not considered to be under the jurisdiction of CDFW. However, all six wetlands are likely considered jurisdictional by the RWQCB. Due to potential impacts to these seasonal wetlands, it is anticipated that the project would need to obtain federal Clean Water Act (CWA) permits from the USACE and SWRCB/RWQCB prior to implementing the project.

Additionally, the proposed project could result in sedimentation, erosion, and runoff during construction. Construction-related activities have the potential to impact water quality. For instance, fuel, oil, grease, solvents, concrete wash, and other chemicals used in construction activities have the potential of creating toxic problems if allowed to enter a waterway. Construction activities are also a source of various other materials including trash, soap, and sanitary waste.

The County has established a Stormwater Ordinance (Sacramento County Code 15.12). The Stormwater Ordinance prohibits the discharge of unauthorized non-stormwater to the County's stormwater conveyance system and local creeks. It applies to all private and public projects in the County, regardless of size or land use type. In addition, the Land Grading and Erosion Control Ordinance (Sacramento County Code 16.44) requires private construction sites disturbing one (1) or more acres or moving 350-cubic yards or more of earthen material to obtain a grading permit. To obtain a grading permit, project proponents must prepare and submit for approval an Erosion and Sediment Control (ESC) Plan describing erosion and sediment control best management practices (BMPs) that would be implemented during construction to prevent sediment from leaving the project site and entering the County's storm drain system or local receiving waters. Construction projects not subject to SCC 16.44 are subject to the Stormwater Ordinance (SCC 15.12) described above.

Additionally, the SWRCB adopted a statewide general National Pollutant Discharge Elimination System (NPDES) permit to regulate stormwater discharges associated with construction activity. Projects which disturb at least one acre of soil are also required to obtain coverage under the General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities Order 2022-0057-DWQ, NPDES No. CAS000002 (Construction General Permit). The Construction General Permit is issued by the SWRCB and enforced by the Central Valley Regional Water Quality Control Board. Preparation and implementation of a site-specific Stormwater Pollution Prevention Plan (SWPPP) is required to comply with the Construction General Permit.

Furthermore, the proposed fueling area and car wash areas would comply with the 2018 Stormwater Quality Design Manual for the Sacramento Region by designing the post-

construction facilities to treat runoff from the project site. The fueling area would implement drainage measures for paving, cover, grading/drainage, connection to sanitary system, and signage. Accordingly, the fuel area would be paved with Portland Cement Concrete, extend 6.5 feet beyond the outer edges of the perimeter pumps, and would be covered by a canopy that meets the minimum required cover height. The fuel area would be hydraulically isolated to prevent run-off from the surrounding areas and would direct under-canopy drainage of surface flow into a sanitary sewer catch basin, which would have an interior drain that directs water to a sand/oil interceptor before being discharged to the sanitary sewer system. Signs prohibiting topping off gas to avoid spills and shut-off valve operation signs would also be installed.

Similarly, the wash area would comply with design areas listed in the 2018 Stormwater Quality Design Manual for the Sacramento Region including drainage measures for size and location, paving, cover, grading/drainage, drainage for covered areas, trash receptacles, and signage. The wash area would be paved, completely enclosed, hydraulically isolated from the rest of the project site, and designed to prevent wash water from entering the storm drain system. All drainage produced by the wash area would be directed to the internal collection system. The internal collection system would route the wash area drainage through the on-site reclamation vaults and a sand/oil interceptor before being discharged into the sanitary sewer system. Additionally, a refuse enclosure would be located at the northeast corner of the wash area.

In addition to the implementation of the BMPs, hydromodification control for the proposed project would be achieved through two on-site bioretention ponds providing temporary storage and controlled release of operational runoff. The proposed project would be designed to route site runoff to the two bioretention treatment ponds, via a combination of surface flow and underground pipes. Discharge rates from the detention facilities would be regulated through outlet control structures designed to attenuate flows within the regulated hydromodification range. The detention facilities would also provide infiltration through the basin bottoms, which further reduces discharge volumes and assists in meeting hydromodification performance criteria. Overland flow is allowed to be safely released along the project frontage without impacting on-site or adjacent structures, consistent with County criteria. The drainage study hydrologic modeling results indicate that the proposed detention and outlet control structures would successfully reduce post-development runoff. Additionally, the Sacramento Area Hydrology Model confirms that post-development flows would remain within the allowable increases for the regulated hydromodification range.

Project compliance with the requirements outlined above, as administered by the Sacramento County Community Development Department and the Central Valley Regional Water Quality Control Board would ensure that project-related erosion and pollution impacts are less than significant. Furthermore, the proposed project would comply with the Stormwater Ordinance and Land Grading and Erosion Control Ordinance (Chapters 15.12 and 16.44 of the County Code respectively) which would ensure that the proposed project would not create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality. Additionally, the proposed project would be designed in compliance with the Stormwater Quality Design Manual for the Sacramento Region and would include detention and treatment facilities that meet LID and hydromodification requirements; therefore, the operation of the proposed project would not degrade surface water quality and the impact is less than significant.

- b. *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

Less than Significant. The proposed project would introduce impervious surfaces throughout the approximately 4.14-acre project site. The existing project site currently contains approximately 4,225 square feet of impervious surface and the proposed project would result in approximately 202,000 square feet of new impervious area. As described in Section XX, *Utilities and Service Systems*, the Rio Linda / Elverta Community Water District is entirely dependent on local groundwater. The southwest corner of the site contains the existing and active Rio Linda / Elverta Community Water District groundwater well #9. The proposed project would ensure all existing utility infrastructure related to groundwater well #9 is maintained at all times during construction. Additionally, the proposed hardscape fronting and surrounding well #9 shall be reviewed and approved by the Rio Linda / Elverta Community Water District. Furthermore, the proposed project would require the submittal of all existing and proposed on-site utility plans to the Rio Linda / Elverta Community Water District for review and approval to ensure consistency with applicable District setback and separation requirements associated with well #9. Therefore, the project would not affect the ability of well #9 to provide water to Rio Linda / Elverta Community Water District customers.

The project site is situated within the 351,000-acre North American Subbasin. The groundwater system of the North American Subbasin experiences approximately 383,000 acre-feet of inflows each year consisting of deep percolation (177,500 AFY), infiltration from the stream system (134,000 AFY), injection of remediated water to the groundwater system (300 AFY), subsurface inflows (54,600 AFY) from the Sierra Nevada foothills and the neighboring subbasins (primarily Yolo and Yuba), and other recharge (16,700 AFY) which is primarily seepage from the irrigation water canal system.¹²⁷ As described above in the *Environmental Setting*, the North American Subbasin GSP was approved by DWR in July 2023, indicating that the North American Subbasin is in compliance with the SGMA. Given the size of the subbasin and the cumulative recharge the basin receives, the relatively small acreage of pervious area which would be lost as a result of project implementation would not substantially interfere with groundwater recharge or sustainable management of the basin. Additionally, the General Plan Conservation Element shows that the project site is not located in an identified groundwater recharge area. Furthermore, the proposed project would also include LID features such as on-site treatment and hydromodification control in compliance with the Stormwater Quality Design Manual for the Sacramento Region which would ensure the proposed project would not interfere with groundwater recharge. Therefore, compliance with the 2021 GSP Plan and with the 2015 SGMA would further reduce environmental effects of the proposed project related to groundwater recharge, and the impact would be less than significant.

- c. *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*
- i. *result in a substantial erosion or siltation on- or off-site;*

Less than Significant. According to the Level 3 Drainage Study (see Appendix F) prepared for the proposed project, the project site lies adjacent to an existing open drainage ditch that

¹²⁷ Sacramento Groundwater Authority GSA, 2021. *North American Subbasin Groundwater Sustainability Plan*. Available at: <https://nasbgroundwater.org/gsp/>. Accessed July 24, 2025.

historically conveys runoff from upstream tributary areas. Runoff flows on the project site would be directed towards open grates and conveyed to the bio-retention ponds located near the southern portion of the site, west of the southern driveway via surface drainage and underground pipe networks. The drainage study demonstrates that the proposed project complies with County standards for storm drainage, water quality, and hydromodification management criteria. Specifically, the proposed project includes development that meets LID and hydromodification requirements; the proposed trunk main system is adequately sized to convey peak flows; and the proposed drainage improvements, including the trunk main routing and controlled discharge would not result in increased runoff associated with the proposed project.

In addition, the proposed project would be subject to the development, review, and implementation of a project-specific drainage study and site-specific grading plan in accordance with Section 2 of the Sacramento County Improvement Standards, which would ensure adequate design and performance of the drainage system. The proposed project would be required to comply with applicable permits to regulate ground-disturbing activities and stormwater runoff, which would include implementation of BMPs and monitoring programs. As described above in criterion a, the proposed project would be required to comply with the requirements and standards in the County's Stormwater Management and Discharge Control Ordinance (County Code Chapter 15.12) and the County's Land Grading and Erosion Control Ordinance (County Code Chapter 16.44). Adhering to these conditions would ensure that the proposed project would result in a less-than-significant impact to on- or off-site erosion or siltation through alteration of the existing drainage pattern.

- ii. *substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;*

Less than Significant. As described above, the proposed project would include storm drainage features designed to collect, convey, and attenuate surface runoff in a manner that would avoid on-site and off-site flooding. The proposed off-site frontage improvements would include construction of a public trunk main storm drain system along Marysville Boulevard and West Elkhorn Boulevard, together with associated inlets and closed-conduit storm drain infrastructure, to intercept and reroute upstream drainage and convey project runoff. In addition, each parcel within the subject development would be served by on-site connections to the proposed storm drain system for stormwater discharge. Based on the accepted Level 3 Drainage Study, the existing downstream culvert beneath West Elkhorn Boulevard has adequate capacity, and upsizing of that culvert is not required as part of the proposed improvements. Runoff from the site and applicable upstream tributary areas would be conveyed through the proposed storm drain system and discharged to an existing 18-inch corrugated metal pipe (CMP) located approximately 270 feet west of the project boundary, consistent with the existing drainage patterns and would maintain continuity of flow within the regional storm drain system.

As part of the proposed project improvements, upstream flows would be partially intercepted and conveyed through a proposed off-site public trunk main system along Marysville Boulevard. The proposed trunk main is designed to intercept Sacramento County Nolte Peak Flow Method (Nolte) flows¹²⁸ from upstream contributing areas including portions of

¹²⁸ The Nolte Method is a County standard used only for trunk main design and hydraulic grade line (HGL) analysis, not for the open-channel floodplain or overland release evaluation. Nolte flows are used for sizing public storm drain pipes and verifying the HGL under typical design conditions.

Westside Elementary School, Dover Estates, and Marysville Boulevard. These flows would be conveyed north to south along Marysville Boulevard before turning west at the intersection of Marysville Boulevard and West Elkhorn Boulevard, thereby routing minor storm flows around the project site and discharging them downstream of the site limits. Therefore, the existing channel would continue to provide sufficient capacity for overland release conveyance during major storm events.

On-site runoff would be directed towards open grates which would collect in underground pipe networks (see **Plate IS-6**) and drain towards the two bio-retention ponds (a 4,759-square-foot pond at the southeast corner of the project site at the corner of Marysville Boulevard and West Elkhorn Boulevard) and a 3,343-square-foot pond at the southern portion of Lot 3 (along West Elkhorn Boulevard). Detention basin storage volumes were evaluated using SacCalc Sacramento Method results. The proposed basins provide approximately 0.148 acre-feet and 0.253 acre-feet of storage respectively. SacCalc results indicate that approximately 0.10 acre-feet of storage is required during the 24-hour 100-year storm event, confirming that both basins provide sufficient storage capacity to attenuate peak flows from the proposed project buildout.

A safe overland release path is a designated, engineered, or natural route that allows excess stormwater to flow across the land surface when underground pipes and drainage systems are full or blocked during heavy rain. A safe overland release path is provided, routed along the frontage with a maximum flow depth of less than 8 inches. The proposed improvements would discharge runoff from the on-site detention facilities at rates lower than the corresponding pre-construction drainage management equivalent areas. As such, post-construction conditions are not anticipated to increase peak flows to the downstream system and are expected to maintain or improve existing downstream hydraulic conditions.

Furthermore, the proposed project would be required to comply with the requirements of the NPDES, General Permit, General Construction Permit, Stormwater Quality Design Manual standards and guidelines as well as Stormwater Management and Discharge Control regulations, which would reduce any potential environmental effects of increased surface runoff resulting from the proposed project and would result in a less-than-significant impact to on- or off-site flooding.

iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Less than Significant. The peak flow analysis in the Level 3 drainage study prepared for the proposed project determined that the peak flow analysis for the existing downstream culvert along Elkhorn Boulevard has adequate capacity to convey the stormwater drainage without impacting flows from upstream. Therefore, upsizing the existing culvert is not required as part of the proposed improvements.¹²⁹

¹²⁹ Core States Group, 2026. *Level 3 Drainage Study*. Accessed April 6, 2026.

Any anticipated infrastructure for the drainage system at the project site would be designed in accordance with the standards and guidelines of the Stormwater Quality Design Manual for the Sacramento Region and the County's Improvement Standards Section 9 (Storm Drain Design).^{130, 131} Compliance with NPDES, General Permit, and General Construction Permit measures, as well as implementation of BMPs to protect stormwater runoff and regulate discharge, and adherence to the County's Stormwater Management and Discharge Control Ordinance (County Code Chapter 15.12) and the County's Land Grading and Erosion Control Ordinance (County Code Chapter 16.44), would reduce the potential effects of drainage pattern alteration to runoff capacity or pollution resulting from the proposed project. Furthermore, the proposed project would require a site-specific drainage study to be reviewed and approved prior to the project construction. Therefore, this impact would be less than significant.

iv. impede or redirect flood flows?

The project site does not fall within any special flood hazard areas or other areas of flood hazard. According to the FEMA National Flood Hazard Layer, the project site is within Zone X (unshaded) which is an area of minimal flood hazard and determined to be outside the 500-year flood and protected by levee from 100-year floods. Although the proposed project would alter existing drainage patterns on-site, the proposed project would not impede or redirect the flow of any existing water body. Any runoff created by the added impervious surface of the proposed project would continue to flow to existing stormwater drainage facilities. In addition, post-construction conditions for the 24-hour 100-year storm event were evaluated using the Sacramento Method in SacCalc, which demonstrates that the proposed detention facilities provide adequate detention capacity and mitigate peak discharge rates relative to existing conditions during major storm events. Furthermore, the proposed project is supported by an accepted Level 3 Drainage Study, which provides the planning-level drainage analysis for the proposed improvements and is adequate for CEQA review. A construction-level Level 4 Drainage Study and site-specific grading plan would be prepared during the improvement plan stage, consistent with Sacramento County requirements, to confirm final design details and implementation of the drainage system. Therefore, the proposed project would not impede or redirect flood flows and impacts would be less than significant.

d. Would the project develop in an area that is subject to 200-year urban levels of flood protection (ULOP)?

Less than Significant. The project site is not within a FEMA 100-year or 500-year floodplain and is mapped by FEMA as Zone X (unshaded), an area of minimal flood hazard.¹³² Sacramento County 2030 General Plan Safety Element Policy SA-22a requires review of development projects in potential flood hazard zones to determine whether the State's 200-year Urban Level of Flood Protection (ULOP) standard applies. The most recent FEMA data

¹³⁰ County of Sacramento, 2018. *Sacramento Region Stormwater Quality Design Manual*. Available at: https://www.cityofsacramento.gov/content/dam/portal/dou/utilities/development-standards/SWQ_Design_Manual_FINAL2018.pdf. Accessed July 24, 2025.

¹³¹ Sacramento County Engineering, 2018. *Improvement Standards, Section 9: Storm Drain Design*, updated 2024. Available at: <https://engineering.saccounty.gov/Pages/ImprovementStandards.aspx>. Accessed July 24, 2025.

¹³² California Department of Water Resources, 2025. *Levee Flood Protection Zone (LFPZ) Maps*. Available at: <https://water.ca.gov/Programs/flood-management>. Accessed July 24, 2025.

shows the site outside of mapped 100- and 500-year zones, thus the proposed project is not in an area subject to 200-year ULOP. Therefore, potential impacts would be less than significant.

- e. *Would the project in flood hazard, tsunami, or seiche zones risk release of pollutants due to project inundation?*

Less than Significant. As discussed above, the project site is within a FEMA designated Zone X (unshaded). The project site is not located near a body of water such that the project would place individuals or structures at risk of a tsunami or seiche. Furthermore, a site specific SWPPP would be developed for the project as part of compliance with the SWRCB Construction General Permit requirements. Therefore, the risk of release of pollutants due to inundation would be minimal and impacts would be less than significant.

- f. *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

No Impact. Construction of the proposed project would include compliance with all applicable regulatory requirements including the development of a site specific SWPPP, adherence to the SWRCB Construction General Permit requirements, and conditions in the County's Stormwater Ordinance. Although the proposed project would result in an increase in impervious surface area on the project site, construction and operation would not decrease groundwater supply or inhibit groundwater recharge. Therefore, implementation of the proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan and there would be no impact.

ENVIRONMENTAL MITIGATION MEASURES

None recommended.

XII. LAND USE AND PLANNING

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

ENVIRONMENTAL SETTING

The project site is located in a agricultural-residential area with nearby suburban uses community of Rio Linda/Elverta in unincorporated Sacramento County. The project site is located within the Rio Linda and Elverta Community Plan. The Rio Linda and Elverta Community Plan outlines land use strategies to accommodate growth in the area which include improving the existing neighborhoods with investment in well-designed new and reused commercial and employment uses, well planned neighborhoods with adequate funding and timing of services, and infrastructure compatible with existing urban and rural uses. The project site has a Rio Linda/Elverta Community Plan land use designation of Agricultural-Residential 2-acres (AR-2) with a Community Plan overlay land use of Agricultural-Residential Preservation Area (ARPA).¹³³

The project site currently has a General Plan land use designation of Agricultural-Residential (AG-RES). The AG-RES designation provides for rural residential uses, such as animal husbandry, small-scale agriculture, and other limited agricultural activities. This designation is typical of established rural communities where between one and ten acres per unit is allowed, resulting in a development density of 2.5 to 0.25 persons per acre.¹³⁴ The project site currently has a Zoning designation of Agricultural-Residential 2-acres (AR-2), which allows for the keeping of animals and raising of crops for educational, recreational, or income purposes.¹³⁵

REGULATORY SETTING

LOCAL

SACRAMENTO COUNTY GENERAL PLAN

The County's General Plan consists of 16 elements that outline the long-range vision for development within the County, focused on existing needs and character of the County. The

¹³³ Sacramento County Planning and Community Development Department, 1998. *Policy Plan for the Rio Linda and Elverta Community Plan*. Available at: <https://planning.saccounty.gov/LandUseRegulationDocuments/Documents/CommunityPlans/Rio-Linda-Community-Plan-1998.pdf>. Accessed July 24, 2025.

¹³⁴ County of Sacramento, 1993. *General Plan Land Use Element*, amended December 13, 2022. Available at: <https://planning.saccounty.gov/PlansandProjectsIn-Progress/pages/generalplan.aspx>. Accessed July 24, 2025.

¹³⁵ County of Sacramento, 2025. *Sacramento County Zoning Code Chapter 2*. Available at: <https://planning.saccounty.gov/LandUseRegulationDocuments/Pages/SacramentoCountyZoningCode.aspx>. Accessed July 24, 2025.

Land Use Element establishes policy for land uses in the unincorporated county for the next 25 years, designates the distribution of land uses, and addresses the permitted density and intensity of the various land use designations as reflected on the County's General Plan Land Use Diagram. Within the project area, West Elkhorn Boulevard is designated as a post-2030 thoroughfare in the General Plan, Transportation Diagram.¹³⁶ The project vicinity includes agricultural-residential and low density residential land use designations based on the General Plan Land Use Diagram.¹³⁷

RIO LINDA AND ELVERTA COMMUNITY PLAN

The Rio Linda and Elverta Community Plan (Community Plan) was adopted in 1998 as a guide for the future growth and development of the Rio Linda and Elverta area. Land use designations within the Community Plan are similar to their counterparts within the General Plan. The project vicinity includes a mix of Agricultural-Residential Preservation Area (ARPA) and Residential Density 5 land use designations based on the Community Plan identified land use designations.¹³⁸

ZONING CODE

In addition to the General Plan and the Community Plan, the County's Zoning Code establishes land use zones with standards and regulations for development within those zones. Similar to the General Plan and Community Plan, the project area includes land use zones of AR-2 and RD-5.

IMPACT DISCUSSION

a. Would the project physically divide an established community?

No Impact. The physical division of an established community typically occurs when a physical barrier is introduced, such as a freeway, railroad, or flood-control channel, or when a project eliminates existing points of access between neighborhoods. The proposed project would not construct these types of features.

The project would instead develop an undeveloped 4.14-acre site with a fueling canopy, convenience store, retail space, car wash, and two quick service restaurants. Surrounding land uses include primarily residential and agricultural uses as well as vacant land. To the north of the project site are single-family residential buildings with agricultural uses. To the east of the project site, across Marysville Boulevard, are single-family residential uses. Adjacent to the southwest corner of the project site is a Municipal Water Supply Well. To the south of the project site are single-family residential uses and vacant land. To the west of the project site are single-family residential uses and vacant land. The existing roadways

¹³⁶ County of Sacramento, 2022. *General Plan Transportation Plan - Combined*, amended December 18, 2019. Available at: https://planning.saccounty.gov/LandUseRegulationDocuments/Documents/General-Plan/Adopted_GP_2030_Trans_Plan_Update_Combo_0124.pdf. Accessed August 27, 2025.

¹³⁷ County of Sacramento, 2011. *General Plan Land Use Diagram*, November 9, 2011. Available at: https://planning.saccounty.gov/LandUseRegulationDocuments/Documents/General-Plan/GPLU2030_UPDATED_FINAL_0918.pdf. Accessed August 27, 2025.

¹³⁸ Sacramento County Planning and Community Development Department, 1998. *Rio Linda and Elverta Community Plan*. Available at: <https://planning.saccounty.gov/Documents/Maps/rio-linda-cp.pdf>. Accessed August 27, 2025.

would remain in place and would continue to provide local connectivity. Rather than dividing or isolating neighborhoods, the proposed project would be consistent with the pattern of suburban development in the Rio Linda/Elverta area and would not alter mobility, access, or social interaction between established land uses. Therefore, the proposed project would have no impact with respect to physically dividing an established community.

- b. *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

Less than Significant. The proposed project would not be consistent with the current General Plan (Agricultural-Residential), Community Plan (AR-2/ARPA), or Zoning designation (AR-2). To allow development, the applicant is requesting a General Plan Amendment (from AG-RES to Commercial/Office), a Community Plan Amendment (from AR-2/ARPA to a new commercial designation, GC), and a Rezone (from AR-2 to General Commercial).

The Commercial/Office (COMM/OFF) designation allows a broad range of retail and office uses, including regional commercial operations, with floor-area ratios between 0.25 and 2.5.¹³⁹ The proposed gas station, convenience store, retail space, car wash, and quick-service restaurants fall within these commercial uses. With a total FAR of 0.12, the project would be well within the permitted range.

The General Commercial (GC) zoning designation provides for more intensive commercial uses, such as restaurants, auto-related services, and retail. Restaurants with drive-throughs and general retail are permitted uses.¹⁴⁰ A Conditional Use Permit (CUP) from the Board of Supervisors is required for an automobile service station, and a CUP from the Zoning Administrator is required for a car wash; obtaining these permits would ensure project compliance with the Zoning Code.¹⁴¹

The Rio Linda/Elverta Community Plan promotes infill development and commercial investment in urban areas (Policies LU-1 and LU-4). Policy LU-10 establishes the AR-2 buffer area as a transition zone between urban Rio Linda and agricultural/industrial uses along the Natomas East Main Drainage Canal west of W 6th Street. The project site is located within this buffer area, however it is located just west of an existing residential subdivision and approximately 1,300 feet of an AR-2 transition zone will continue to remain between the site and W 6th Street.¹⁴² Additionally, the proposed project is currently located within the ARPA overlay which is placed on all land designated in an agricultural-residential land use category and highlights the importance of protecting agricultural-residential land

¹³⁹ County of Sacramento, 1993. *General Plan Land Use Element*, amended December 13, 2022. Available at: <https://planning.saccounty.gov/PlansandProjectsIn-Progress/pages/generalplan.aspx>. Accessed July 24, 2025.

¹⁴⁰ County of Sacramento, 2025. *Sacramento County Zoning Code Chapter 2*. Available at: <https://planning.saccounty.gov/LandUseRegulationDocuments/Pages/SacramentoCountyZoningCode.aspx>. Accessed July 24, 2025.

¹⁴¹ County of Sacramento, 2025. *Sacramento County Zoning Code Chapter 3*. Available at: <https://planning.saccounty.gov/LandUseRegulationDocuments/Pages/SacramentoCountyZoningCode.aspx>. Accessed July 24, 2025.

¹⁴² Sacramento County Planning and Community Development Department, 1998. *Policy Plan for the Rio Linda and Elverta Community Plan*. Available at: <https://planning.saccounty.gov/LandUseRegulationDocuments/Documents/CommunityPlans/Rio-Linda-Community-Plan-1998.pdf>. Accessed July 24, 2025.

from urban encroachment in Rio Linda and Elverta (Policy LU-30). As stated above, the proposed project requests a Community Plan Amendment from AR-2/ARPA to a new commercial designation of GC, which would include the removal of the ARPA overlay.

The proposed project would include amendments to the General Plan, Rio Linda/Elverta Community Plan, and rezoning. The proposed amendments would allow for the proposed commercial uses to be developed on the project site. Therefore, with approval of the requested amendments, the proposed project would be consistent with the revised General Plan and Rio Linda/Elverta Community Plan land use designations and zoning applicable to the project site and the impact would be less than significant.

ENVIRONMENTAL MITIGATION MEASURES

None recommended.

XIII. MINERAL RESOURCES

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?	☐	☐	☐	☒
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

ENVIRONMENTAL SETTING

Mineral resources in Sacramento County include natural gas, petroleum, sand, gravel, clay, gold, silver, peat, topsoil and lignite. The principal resources which are in production are aggregate (sand and gravel) and natural gas. The natural gas production areas are located mostly in the Delta's Rio Vista Field, one of California's largest producing areas. Sacramento County's primary remaining aggregate deposits are located in the Old American River channel south of Rancho Cordova. The project site and surrounding vicinity are not delineated as important mineral resource recovery sites in the Sacramento County General Plan.¹⁴³

Mineral Resource Zones (MRZs) are classified on the basis of geologic factors, without regard to existing land use and land ownership. MRZs are categorized into four broad classifications, MRZ-1 through MRZ-4. According to the statewide mapping of aggregate resources done by the California Geologic Survey, the project site and surrounding vicinity are classified as MRZ-1 which are "areas where available geologic information indicates that little likelihood exists for the presence of significant concrete aggregate resources".¹⁴⁴

REGULATORY SETTING**STATE*****SURFACE MINING AND RECLAMATION ACT***

The Surface Mining and Reclamation Act (SMARA) was enacted by the California legislature in 1975 to address the need for a continuing supply of mineral resources, and to prevent or minimize the negative impacts of surface mining to public health, property, and the environment. As mandated under SMARA, the State Geologist has designated mineral land classifications in order to help identify and protect mineral resources in areas within the state subject to urban

¹⁴³ County of Sacramento, 2017. *Conservation Element*. Available at: <https://planning.saccounty.gov/LandUseRegulationDocuments/Documents/General-Plan/Conservation%20Element%20-%20Amended%2009-26-17.pdf>. Accessed July 22, 2025.

¹⁴⁴ California Department of Conservation, California Geologic Survey, 2018. *Mineral Land Classification Map of Concrete Aggregate in the Greater Sacramento Area Production-Consumption Region*. Available at: https://www.conservation.ca.gov/cgs/Documents/Publications/Special-Reports/SR_245-MLC-SacramentoPCR-2018-Plate01-a11y.pdf. Accessed July 22, 2025.

expansion or other irreversible land uses which would preclude mineral extraction. SMARA also allowed the State Mining and Geology Board (SMGB), after receiving classification information from the State Geologist, to designate lands containing mineral deposits of regional or statewide significance.

IMPACT DISCUSSION

- a. *Would the project result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?*

No Impact. As described above in the *Environmental Setting*, the project site is located in an area classified as MRZ-1, which includes areas where available geologic information indicates that little likelihood exists for the presence of significant concrete aggregate resources. Therefore, the project site does not contain known mineral resources, and implementation of the proposed project would not affect mineral resources of regional or statewide value. Therefore, no impact would occur.

- b. *Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?*

No Impact. The Sacramento County General Plan identifies important aggregate resource areas as an overlay on land use maps. The project site is not delineated as a locally important mineral resource recovery site in the Sacramento County General Plan land use map.¹⁴⁵ Therefore, implementation of the proposed project would not result in the loss of availability of mineral resources and there would be no impact.

ENVIRONMENTAL MITIGATION MEASURES

None recommended.

¹⁴⁵ Sacramento County, 2011. *General Plan Land Use Diagram*, November 9, 2011. Available at: https://planning.saccounty.gov/LandUseRegulationDocuments/Documents/General-Plan/GPLU2030_UPDATED_FINAL_0918.pdf. Accessed July 22, 2025.

XIV. NOISE

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐

This section presents and summarizes the results of the Environmental Noise & Vibration Assessment for the ARCO Marysville & Elkhorn Project, prepared by Bollard Acoustical Consultants Inc. (2025), and included as Appendix B to this Initial Study.

ENVIRONMENTAL SETTING

NOISE TERMINOLOGY

Noise is most often defined as unwanted sound. Although sound can be easily measured, the perceptibility of sound is subjective, and the physical response to sound complicates the analysis of its impact on people. People judge the relative magnitude of sound sensation in subjective terms, such as “noisiness” or “loudness.” Sound pressure magnitude is measured and quantified using a logarithmic ratio of pressures, the scale of which gives the level of sound in decibels (dB). The human hearing system is not equally sensitive to sound at all frequencies. Therefore, to approximate the human, frequency-dependent response, the A-weighted filter system is used to adjust measured sound levels. The A-weighted decibel (dBA), typically applied to community noise measurements,¹⁴⁶ de-emphasizes low frequencies to which human hearing is less sensitive and focuses on mid- to high-range frequencies. The range of human hearing is approximately 3 to 140 dBA, with 110 dBA considered intolerable or painful to the human ear. In a non-controlled environment, a change in sound level of 3 dB is considered “just perceptible,” a change in sound level of 5 dB is considered “clearly noticeable,” and a change in 10 dB is perceived as a doubling of sound volume.¹⁴⁷ A change in sound level of 1 dB cannot be perceived by the human ear except in carefully controlled laboratory experiments.¹⁴⁸ Although

¹⁴⁶ M David Egan, *Architectural Acoustics*, Chapter 1, March 1988.

¹⁴⁷ Bies & Hansen, *Engineering Noise Control*, 1988.

¹⁴⁸ California Department of Transportation (Caltrans), *Technical Noise Supplement to the Traffic Noise Analysis Protocol (TeNS)*, September 2013, Section 2.2.1.

the A-weighted scale accounts for a range of people's responses and is, therefore, commonly used to quantify individual event or general community sound levels, the degree of annoyance or other response effects also depends on several other factors. These factors include:

- Ambient (background) sound level;
- Magnitude of sound event with respect to the background noise level;
- Duration of the sound event;
- Number of event occurrences and their repetitiveness; and
- Time of day that the event occurs.

In an outdoor environment, sound levels attenuate with distance. Such attenuation is called "distance loss" or "geometric spreading" and is influenced by the noise source configuration (i.e., point source or line source). For a point source, such as stationary equipment, the rate of sound attenuation is usually 6 dB per doubling of distance from the noise source at urban, acoustically "hard" sites, or highly acoustically reflective settings that preserve sound energy (water, asphalt, and concrete). Within such environments, a sound level of 50 dBA at a distance of 25 feet from the noise source would attenuate to 44 dBA at a distance of 50 feet. For a line source within an acoustically hard environment, such as a roadway with a constant flow of traffic, the rate of sound attenuation is 3 dB per doubling of distance.¹⁴⁹ In addition, structures (e.g., buildings and solid walls) and natural topography (e.g., hills) that obstruct the line-of-sight between a noise source and a receptor further reduce the noise level if the receptor is located within the "shadow" of the obstruction, such as behind a sound wall. This type of sound attenuation is known as "barrier insertion loss." If a receptor is located behind the wall but still has a view of the source (i.e., line-of-sight not fully blocked), some barrier insertion loss would still occur but to a lesser extent. A receptor located on the same side of the wall as a noise source may experience an increase in the perceived noise level as the wall reflects noise back to the receptor, thereby compounding the noise. Noise barriers can provide noise level reductions ranging from approximately 5 dBA (where the barrier just breaks the line-of-sight between the source and receiver) up to 20 dBA with a more substantial barrier.¹⁵⁰

Community noise levels usually change continuously during the day. The equivalent sound level (L_{eq}) is normally used to describe community noise. The L_{eq} is the equivalent steady-state A-weighted sound level that would contain the same acoustical energy as the time-varying A-weighted sound level during the same time interval. For intermittent noise sources, the maximum noise level (L_{max}) is normally used to represent the maximum noise level measured during the measurement. Maximum and minimum noise levels, as compared to the L_{eq} , are a function of the characteristics of the noise source. As an example, sources, such as generators, have maximum and minimum noise levels that are similar to L_{eq} since noise levels for steady-state noise sources do not substantially fluctuate. However, as another example, vehicular noise levels along local roadways result in substantially different minimum and maximum noise levels when compared to the L_{eq} since noise levels fluctuate during pass-by events.

To assess noise levels over a given 24-hour time period, the day/night average level (L_{dn} or DNL) is based upon the average noise level over a 24-hour day, with a +10 dB weighting applied to noise occurring during nighttime (10:00 p.m. – 7:00 a.m.) hours. The nighttime penalty is based upon the assumption that people react to nighttime noise exposures as though

¹⁴⁹ Caltrans, Technical Noise Supplement (TeNS), 2013.

¹⁵⁰ Caltrans, Technical Noise Supplement (TeNS), 2013.

they were twice as loud as daytime exposures. Because DNL represents a 24-hour average, it tends to deemphasize short-term variations in the noise environment.

VIBRATION TERMINOLOGY

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. The response of humans, buildings, and equipment to vibration is more accurately described using velocity or acceleration.¹⁵¹ Vibration amplitudes are usually described in terms of peak levels, as in peak particle velocity (PPV). The peak level represents the maximum instantaneous peak of the vibration signal. In addition, vibrations can be measured in the vertical, horizontal longitudinal, or horizontal transverse directions. Ground vibrations are most often greatest and can damage buildings, when they propagate in the vertical direction.¹⁵² Therefore, the analysis of groundborne vibration associated with the Project was evaluated in the vertical direction. Typically, groundborne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Man-made vibration issues are, therefore, usually confined to short distances from the source (i.e., 50 feet or less). The groundborne vibration attenuation equation for evaluating potential damage to structures is presented below.

$$PPV_{\text{equip}} = PPV_{\text{ref}} (25/D)^n$$

where, PPV_{ref} = reference source vibration, D = Distance, and
 n = factor for soil attenuation (typically $n = 1.5$).

Groundborne vibration may also cause potential human annoyance inside inhabited buildings. The groundborne vibration attenuation equation for evaluating potential human annoyance is similar to the methodology for evaluating potential damage to structures, which is based on the measured distance of the vibration sensitive receptor from the source of the groundborne vibration. The standard attenuation formula is as follows:

$$VdB_{\text{equip}} = VdB_{\text{ref}} - 30 \times \log(D/25)$$

where, VdB_{equip} = noise level in velocity decibels of the equipment adjusted for distance,
 VdB_{ref} = reference vibration level in velocity decibels at 25 feet D is the distance from the equipment to the receiver

NOISE SENSITIVE RECEPTOR LOCATIONS

Human response to noise varies considerably from one individual to another. Effects of noise at various levels can include interference with sleep, concentration, and communication, and can cause physiological and psychological stress and hearing loss. Given these effects, some land uses are considered more sensitive to ambient noise levels than others. In general, residences, schools, hospitals, and nursing homes are considered to be the most sensitive to noise. Places such as churches, libraries, and cemeteries (where people tend to pray, study, and/or contemplate) are also sensitive to noise. Commercial and industrial uses are considered the least noise sensitive.

The closest noise sensitive receptors include residences located northeast and east of the Project site. There are also Agricultural Residential (AR) zoned properties to the south and southwest of the project, across W Elkhorn Boulevard, that contain existing residences that have been

¹⁵¹ FTA, Transit Noise and Vibration Impact Assessment Manual, p. 110, September 2018.

¹⁵² Caltrans, Transportation Related Earthborne Vibrations, page 4, February 2002.

constructed on those parcels. The property immediately north of the project site is utilized for agricultural purposes and does not currently contain a residence or contain sensitive receptors.

AMBIENT NOISE ENVIRONMENT

The existing ambient noise environment within the immediate project vicinity is defined primarily by traffic on W Elkhorn Boulevard and Marysville Boulevard. To quantify the existing ambient noise environment within the immediate project vicinity, Bollard Acoustical Consultants, Inc. conducted long-term (120-hour) ambient noise level surveys at three locations Wednesday, September 27 through Sunday, October 1, 2023. The ambient noise survey locations are identified in Appendix B

Noise level measurements obtained at site 1, located along the southwest project property boundary, are believed to be representative of the ambient noise level environments at the closest agricultural residential zoned properties and existing residences to the south and west. Long-term noise survey site 2, located at the north end of the project parcel, was selected to be representative of the ambient noise level environment at the adjacent agricultural residential zoned parcel and existing residence to the north. Finally, noise level measurements obtained at site 3, located near the east end of the project property, are believed to be representative of the existing ambient noise level environments at the nearest residential zoned properties and existing residences to the east. See **Plate IS-7** for the locations of the nearest residential zoned properties and the locations of the ambient noise measurements.

Larson Davis Laboratories (LDL) Model LxT precision integrating sound level meters were used to complete the long-term noise level surveys. The meters were calibrated immediately before use with an LDL Model CA200 acoustical calibrator to ensure the accuracy of the measurements. The equipment used meets all specifications of the American National Standards Institute requirements for Type 1 sound level meters (ANSI S1.4). The results of the long-term ambient noise surveys are shown and are summarized in Table IS-10.

As shown in Table IS-10, measured day-night average levels (DNL) and average measured hourly median (L_{50}) and maximum (L_{max}) noise levels were generally consistent at each survey site during the 120-hour monitoring period (i.e., relatively small range of measured values).

AMBIENT VIBRATION ENVIRONMENT

Groundborne vibration generated by man-made activities (i.e., rail and roadway traffic, mechanical equipment and typical construction equipment) diminishes rapidly as the distance from the source of the vibration become greater. The operation of construction equipment and construction techniques generate ground vibration. Traffic traveling on roadways can also be a source of such vibration. At high enough amplitudes, ground vibration has the potential to damage structures and/or cause cosmetic damage. Ground vibration can also be a source of annoyance to individuals who live or work close to vibration-generating activities. However, traffic rarely generates vibration amplitudes high enough to cause structural or cosmetic damage.

During site visits conducted by Bollard Acoustical Consultants on September 26th and October 2nd, 2023, it was noted that vibration levels were below the threshold of perception within the project area and the immediate project vicinity. Therefore, the existing vibration environment in the project area and immediate project vicinity is considered to be negligible.

Table IS-10: Summary of Long-Term Ambient Noise Survey Results

Site Description ¹	Date	DNL (dB)	Average Measured Hourly Noise Levels (dB) ²			
			Daytime ³		Nighttime ³	
			L ₅₀	L _{max}	L ₅₀	L _{max}
Site 1: Southwest end of Project parcel near W Elkhorn Blvd	9/27/23	62	55	72	50	70
	9/28/23	66	55	74	51	75
	9/29/23	63	58	78	50	73
	9/30/23	63	58	78	49	72
	10/1/23	60	54	76	45	69
Site 2: North end of Project parcel	9/27/23	58	49	70	47	67
	9/28/23	61	49	70	46	69
	9/29/23	60	53	75	47	69
	9/30/23	58	52	73	45	66
	10/1/23	57	48	70	43	67
Site 3: East end of Project parcel near Marysville Blvd & W Elkhorn	9/27/23	62	52	77	48	72
	9/28/23	64	53	75	47	72
	9/29/23	62	55	80	48	73
	9/30/23	62	54	81	47	71
	10/1/23	59	50	78	45	71
Notes: 1. Noise monitoring locations are identified in Plate IS-7 (see below). 2. Detailed summaries of the noise monitoring results are provided in Appendix B. 3. Daytime: 7:00 AM to 10:00 PM, Nighttime: 10:00 PM to 7:00 AM						

EXISTING ROADWAY NOISE LEVELS

To predict traffic noise levels along existing roadway networks with multiple segments, modelling is commonly used rather than monitoring. The FHWA Traffic Noise Model (FHWA-RD-77-108) was used to quantify existing traffic noise levels at the existing sensitive land uses nearest to the project area roadway network. The Model was also used to quantify the distances to the 60, 65 and 70 dB DNL traffic noise contours for these roadways. The FHWA Model predicts hourly average (L_{eq}) values for free-flowing traffic conditions. Estimates of the hourly distribution of traffic for a typical 24-hour period were used to develop DNL values from L_{eq} values.

Existing traffic data in the form of AM and PM peak hour intersection turning movements were obtained from the Project's Local Transportation Analysis Memorandum (2025) prepared by Kimley-Horn. The data was converted to Average Daily Traffic (ADT) segment volumes by applying a factor of 5 to the sum of AM and PM peak hour conditions. Other inputs were obtained from Bollard Acoustical Consultants Inc. observations and noise measurement data. The existing traffic noise levels at the distances representing the nearest noise-sensitive land uses to the project area roadways and distances from the centerlines of selected roadways to the 60 dB, 65 dB and 70 dB DNL contours are summarized in Table IS-11. More detailed inputs and data are presented in Appendix B.



Plate IS-7
Surrounding Residential Properties
and Ambient Noise Monitoring Locations



Table IS-11: Existing Traffic Noise Levels at Sensitive Receptors and Distances to DNL Contours

Number	Roadway	Segment Description	DNL at Nearest Sensitive Receptor	Distance to Contour (ft)		
				70 dB DNL	65 dB DNL	60 dB DNL
1	W Elkhorn Boulevard	West of 4 th Street	64	46	100	215
2	W Elkhorn Boulevard	W 4 th Street to Marysville Boulevard	62	46	100	215
3	W Elkhorn Boulevard	Marysville Boulevard to W 2 nd Street	62	44	94	202
4	W Elkhorn Boulevard	East of W 2 nd Street	65	45	96	207
5	W 4 th Street	South of W Elkhorn Boulevard	36	0	1	2
6	Marysville Boulevard	North of W Elkhorn Boulevard	54	6	13	29
7	Marysville Boulevard	South of W Elkhorn Boulevard	56	9	20	44
8	W 2 nd Street	North of W Elkhorn Boulevard	55	7	14	31
9	W 2 nd Street	South of W Elkhorn Boulevard	49	4	8	17
<i>Source: Environmental Noise and Vibration Assessment, prepared by Bollard Acoustical Consultants (2025).</i>						

REGULATORY SETTING

Federal, state, and local agencies regulate different aspects of environmental noise. Federal and state agencies generally set noise standards for mobile sources such as aircraft and motor vehicles, while regulation of stationary sources is left to local agencies. Local regulation of noise involves implementation of general plan policies and noise ordinance standards. Local general plans tend to identify general principles intended to guide and influence development plans; local ordinances establish standards and procedures for addressing specific noise sources and activities.

FEDERAL***FEDERAL INTERAGENCY COMMISSION ON NOISE (FICON)***

The Federal Interagency Commission on Noise (FICON) has developed a graduated scale for use in the assessment of project-related noise level increases. The criteria shown in Table IS-12 was developed by FICON as a means of developing thresholds for impact identification for project-related noise level increases. The FICON standards have been used extensively in recent years in the preparation of the noise sections of Environmental Impact Reports that have been certified in many California cities and counties.

Table IS-12: Significance of Changes in Cumulative Noise Exposure

Ambient Noise Level Without Project (DNL)	Change in Ambient Noise Level Due to Project
<60 dB	+5.0 dB or more
60 to 65 dB	+3.0 dB or more
>65 dB	+1.5 dB or more
<i>Source: Federal Interagency Committee on Noise (FICON)</i>	

The use of the FICON standards is considered conservative relative to thresholds used by other agencies in the State of California. For example, the California Department of Transportation (Caltrans) requires a project-related traffic noise level increase of 12 dB for a finding of significance, and the California Energy Commission (CEC) considers project-related noise level increases between 5 to 10 dB significant, depending on local factors. Therefore, the use of the FICON standards, which set the threshold for finding of significant noise impacts as low as 1.5 dB, provides a very conservative approach to impact assessment for the Project.

Table IS-12 outlines FICON's thresholds used for impact determination. Based on the FICON research, as shown in Table IS-12, a 5 dB increase in noise levels due to a project is required for a finding of significant noise impact where ambient noise levels without the project are less than 60 dB DNL. Where pre-project ambient conditions are between 60 and 65 dB DNL, a 3 dB increase is applied as the standard of significance. Finally, in areas already exposed to higher noise levels, specifically pre-project noise levels in excess of 65 dB DNL, a 1.5 dB increase is considered by FICON as the threshold of significance.

FEDERAL TRANSIT ADMINISTRATION

The vibration impact criteria developed by the Federal Transit Administration (FTA) were applied to the Project. The FTA criteria applicable to damage and annoyance from vibration typically associated with construction activities are presented in Table IS-13 and IS-14.

Table IS-13: Construction Vibration Damage Criteria

Building Category	RMS VdB ¹
I. Reinforced-concrete, steel, or timber (no plaster)	102
II. Engineered concrete and masonry (no plaster)	98
III. Non-engineered timber and masonry buildings	94
IV. Buildings extremely susceptible to vibration damage	90
Notes: 1. RMS velocity in decibels (VdB) re 1 μ in/sec. Source: FTA, <i>Transit Noise and Vibration Impact Assessment Manual</i> , Table 12-3, September 2018.	

Table IS-14: Groundborne Vibration Impact Criteria for General Assessment

Land Use Category	Impact Levels (VdB)		
	Frequent Events ^a	Occasional Events ^b	Infrequent Events ^c
Cat 1: Buildings where vibration would interfere w/ interior ops.	65 ^d	65 ^d	65 ^d
Cat 2: Residences and buildings where people normally sleep	72	75	80
Cat 3: Institutional land uses with primarily daytime uses	75	78	83
<i>Notes:</i> a. "Frequent Events" is defined as more than 70 vibration events of the same source per day b. "Occasional Events" is defined as between 30 and 70 vibration events of the same source per day. c. "Infrequent Events" is defined as fewer than 30 vibration events of the same source per day. d. This criterion limit is based on levels that are acceptable for most moderately-sensitive equipment such as optical microscopes. Vibration-sensitive manufacturing or research will require detailed evaluation to define the acceptable vibration levels. Source: FTA, Transit Noise and Vibration Impact Assessment Manual, September 2018.			

STATE***CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)***

Appendix G of the CEQA Guidelines asks whether the project would result in any of the following to determine whether a significant noise or vibration impact would occur:

- A. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or other applicable standards of other agencies; or
- B. Generation of excessive groundborne vibration or groundborne noise levels; or
- C. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels.

It should be noted that audibility is not a test of significance according to CEQA. If this were the case, any project which added any audible amount of noise to the environment would be considered significant according to CEQA. Because every physical process creates noise, the use of audibility alone as significance criteria would be unworkable. CEQA requires a substantial increase in noise levels before noise impacts are identified, not simply an audible change.

LOCAL***RIO LINDA AIRPORT COMPREHENSIVE LAND USE PLAN***

The Project area is located approximately 1¼ miles northwest of Rio Linda Airport (private airstrip). According to the Land Use Compatibility Guidelines for Safety contained in the Rio Linda Airport Comprehensive Land Use Plan (Rio Linda ACLUP), auto and truck service

stations (such as the one proposed by the project) are compatible within the “Overflight Zone”, and not compatible within the “Clear Zone” or “Approach-Departure Zone”. The Airport Safety Zones Map (Figure 9 of the Rio Linda ACLUP) is presented in Appendix B

SACRAMENTO COUNTY GENERAL PLAN

The Noise Element of the Sacramento County General Plan contains the County’s noise-related policies. The specific policies which are generally applicable to the Project are presented below:

Aircraft Noise Sources

Policy NO-2: Proposals for new development within Sacramento County which may be affected by aircraft noise shall be evaluated relative to General Plan Table 4, except in the following case. Development proposals which may be affected by aircraft noise from Sacramento International Airport shall be evaluated relative to the Land Use Compatibility Plan prepared for Sacramento International Airport dated December 12, 2013, adopted herein by reference.

Note: General Plan Table 4 (Land Use Compatibility for Airport Noise for all Public Use Airports Except for Sacramento International Airport) establishes an exterior noise level environment of up to 80 dB CNEL as acceptable for auto and truck service stations, such as the use proposed by the project.

Non-Transportation Noise Sources

Policy NO-6: Where a project would consist of or include non-transportation noise sources, the noise generation of those sources shall be mitigated so as not exceed the interior and exterior noise level standards of Table IS-15 (General Plan Table 2) at existing noise-sensitive areas in the project vicinity.

Construction Noise

Policy NO-8: Noise associated with construction activities shall adhere to the County Code requirements. Specifically, Section 6.68.090(e) addresses construction noise within the County.

SACRAMENTO COUNTY CODE – CHAPTER 6.68 NOISE CONTROL

Noise generated by development allowed under the proposed project and experienced at nearby residential properties would be subject to the County Code noise limits. It should be noted that Section 6.68 of the Sacramento County Code (Noise Control) establishes standards for acceptable noise exposure at residential uses. However, the County’s Noise Ordinance standards are consistent with the County’s General Plan standards. Therefore, compliance with the General Plan’s noise level criteria shown in Table IS-15 of this report would ensure satisfaction of both the General Plan and Noise Ordinance standards. The following text presents the Sacramento County Code noise level limits as defined in County Code Chapter 6.68 Noise Control.

**Table IS-15: Non-Transportation Noise Standards Sacramento County Noise Element
Median (L_{50}) / Maximum (L_{max})¹**

Outdoor Area ²			Interior ³ Day or Night	Notes
Receiving Land Use	Daytime	Nighttime		
All Residential	55 / 75	50 / 70	35 / 55	
Transient Lodging	55 / 75	--	35 / 55	4
Hospitals & Nursing Homes	55 / 75	--	35 / 55	5,6
Theaters & Auditoriums	--	--	30 / 50	6
Churches, Meeting Halls, Schools, Libraries, etc.	55 / 75	--	35 / 60	6
Office Buildings	60 / 75	--	45 / 65	6
Commercial Buildings	--	--	45 / 65	6
Playground, Parks, etc.	65 / 75	--	--	6
Industry	60 / 80	--	50 / 70	6

Notes:

1. The Table 2 standards shall be reduced by 5 dB for sounds consisting primarily of speech or music, and for recurring impulsive sounds. If the existing ambient noise level exceeds the standards of Table 2, then the noise level standards shall be increased at 5 dB increments to encompass the ambient.
2. Sensitive areas are defined acoustic terminology section.
3. Interior noise level standards are applied within noise-sensitive areas of the various land uses, with windows and doors in the closed positions.
4. Outdoor activity areas of transient lodging facilities are not commonly used during nighttime hours.
5. Hospitals are often noise-generating uses. The exterior noise level standards for hospitals are applicable only at clearly identified areas designated for outdoor relaxation by either hospital staff or patients.
6. The outdoor activity areas of these uses (if any) are not typically utilized during nighttime hours.
7. Where median (L_{50}) noise level data is not available for a particular noise source, average (L_{eq}) values may be substituted for the standards of this table provided the noise source in question operates for at least 30 minutes of an hour. If the source in question operates less than 30 minutes per hour, then the maximum noise level standards shown would apply.

Source: Sacramento County, 2011. County of Sacramento General Plan, Amended December 13, 2017. Noise Element, Table 2.

Chapter 6.68.090 Exemptions

- e) Noise sources associated with construction, repair, remodeling, demolition, paving or grading of any real property, provided said activities do not take place between the hours of eight p.m. and six a.m. on weekdays and Friday commencing at eight p.m. through and including seven a.m. on Saturday; Saturdays commencing at eight p.m. through and including seven a.m. on the next following Sunday and on each Sunday after the hour of eight p.m. Provided, however, when an unforeseen or unavoidable condition occurs during a construction project and the nature of the project necessitates that work in process be continued until a specific phase is completed, the contractor or owner shall be allowed to continue work after eight p.m. and to operate machinery and equipment necessary until completion of the specific work in progress can be brought to conclusion under conditions which would not jeopardize inspection acceptance or create undue financial hardships for the contractor or owner.

IMPACT DISCUSSION

- a. *Would the project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

Construction

Less than Significant. During project construction, heavy equipment would be used for grading excavation, paving, and building construction, which would increase ambient noise levels when in use. Noise levels would vary depending on the type of equipment used, how it is operated, and how well it is maintained. Noise exposure at any single point outside the project work area would also vary depending upon the proximity of equipment activities to that point.

Policy NO-8 of the County's General Plan states that noise associated with construction activities shall adhere to County Code requirements – specifically Section 6.68.090(e). Sacramento County Code Section 6.68.90(e) exempts noise sources associated with construction activities provided such activities do not occur between the hours of 8:00 p.m. and 6:00 a.m. on weekdays and Friday commencing at 8:00 p.m. through and including 7:00 a.m. on Saturday; Saturdays commencing at 8:00 p.m. through and including 7:00 a.m. on the next following Sunday and on each Sunday after the hour of 8:00 p.m. It is reasonably assumed for the purposes of this analysis that all noise-generating on-site project construction equipment and activities would occur pursuant to County Code Section 6.68.90(e) and would thereby be exempt from County Code noise level criteria.

However, noise from heavy equipment operations during on-site construction activities would add to the noise environment in the immediate vicinity of the work area. In terms of determining the temporary noise increase due to project-related construction activities, an impact would occur if construction activity were to noticeably increase ambient noise levels above background levels at sensitive receptors. The threshold of perception of the human ear is approximately 3 to 5 dB – a 5 dB change is considered to be clearly noticeable. For this analysis, a noticeable increase in ambient noise levels is assumed to occur where noise levels increase by 5 dB or more over existing ambient noise levels at nearby noise-sensitive receptors (i.e., existing residences).

Table IS-16, shown below, includes the summary of predicted maximum equipment noise levels at the outdoor activity areas of the identified nearby existing residences. The analysis assumes a standard spherical spreading loss of 6 dB per doubling of distance. For more detailed results, see Appendix B.

Using the average hourly maximum noise levels measured during the construction hours exempted by County Code Section 6.68.90(e), and the highest predicted construction equipment maximum noise levels shown in Table IS-16, ambient plus project construction equipment noise level increases were calculated at residences 1-7. The results of those calculations indicate that increases in ambient maximum noise levels from project construction activities would range from 0.6 dB L_{max} to 4.4 dB L_{max} at the identified existing sensitive receptors. The calculated range of ambient maximum noise level increases is below the applied increase significance criterion of 5 dB.

Table IS-16: Summary of Construction Equipment Predicted Noise Levels at Nearby Existing Residences

Noise Level	Predicted Equipment Noise Level at Residences, L_{max} (dB)						
	Res 1 (230')	Res 2 (300')	Res 3 (420')	Res 4 (210')	Res 5 (170')	Res 6 (100')	Res 7 (175')
Equipment Maximum	72	69	67	73	74	79	74
Average Daytime Ambient L_{max} Noise Level	75.6	75.6	75.6	71.6	71.6	78.2	78.2
Ambient + Max Noise Level	77.2	76.5	76.2	75.4	76.0	81.6	79.6
Increase in Ambient	+1.6	+0.9	+0.6	+3.8	+4.4	+3.4	+1.4
<i>Source: Environmental Noise and Vibration Assessment, prepared by Bollard Acoustical Consultants (2025). Modified by ESA (2025).</i>							

Based on the discussion and analysis provided above, this impact is identified as being less than significant. Nonetheless, to reduce the potential for annoyance at nearby existing noise-sensitive receptors (i.e., residences), the following measures should be incorporated into Project on-site construction:

- All on-site noise-generating construction activities should occur pursuant to Sacramento County Code Section 6.68.090(e).
- All noise-producing project construction equipment and vehicles using internal-combustion engines shall be equipped with manufacturers-recommended mufflers and be maintained in good working condition.
- All mobile or fixed noise-producing equipment used on the project site that are regulated for noise output by a federal, state, or local agency shall comply with such regulations while in the course of project activity.
- Electrically powered equipment shall be used instead of pneumatic or internal-combustion-powered equipment, where feasible.
- Material stockpiles and mobile equipment staging, parking, and maintenance areas shall be located as far as practicable from noise-sensitive uses.
- Work area speed limits shall be established and enforced during the construction period.

Operations

Operational Traffic Noise

Less than Significant. The FHWA Traffic Noise Model (FHWA-RD-77-108) was used to quantify increases in existing traffic noise levels at the existing sensitive land uses nearest to the project area roadway network. The FHWA Model predicts hourly L_{eq} values for free-flowing traffic conditions. Estimates of the hourly distribution of traffic for a typical 24-hour period were used to develop DNL values from L_{eq} values.

Traffic data in the form of peak hour intersection turning movements were obtained from the traffic impact analysis prepared by the Project's transportation consultant (Kimley-Horn). Those data were converted to Average Daily Traffic (ADT) segment volumes by applying a factor of 5 to the sum of AM and PM peak hour conditions. Other inputs were obtained from Bollard Acoustical Consultants observations and noise measurement data. The existing and existing plus project traffic noise levels at the distances representing the nearest noise-sensitive land uses to the project area roadways are summarized in Table IS-17. Table IS-17 also shows the thresholds for determination of a significant traffic noise increase, whether the roadway segment contains sensitive uses, and whether or not significant noise impacts are identified for each segment.

Table IS-17: Predicted Traffic Noise Level Increases at Existing Noise-Sensitive Receptors – Existing vs. Existing Plus Project Conditions

Number	Roadway	Segment Description	Predicted DNL			Significance Threshold ¹	Threshold Exceeded? ^{2,3}
			Existing	Existing + Project	Increase		
1	W Elkhorn Boulevard	West of 4 th Street	64.4	64.6	0.2	3.0	No
2	W Elkhorn Boulevard	W 4 th Street to Marysville Boulevard	61.9	62.2	0.3	3.0	No
3	W Elkhorn Boulevard	Marysville Boulevard to W 2 nd Street	61.9	62.3	0.4	3.0	No
4	W Elkhorn Boulevard	East of W 2 nd Street	65.4	65.7	0.3	1.5	No
5	W 4 th Street	South of W Elkhorn Boulevard	35.6	35.6	0.0	5.0	No
6	Marysville Boulevard	North of W Elkhorn Boulevard	53.7	57.7	4.0	5.0	No
7	Marysville Boulevard	South of W Elkhorn Boulevard	56.5	56.9	0.4	5.0	No
8	W 2 nd Street	North of W Elkhorn Boulevard	55.2	55.7	0.5	5.0	No
9	W 2 nd Street	South of W Elkhorn Boulevard	48.5	48.5	0.0	5.0	No
10	W Elkhorn Boulevard	W 4 th Street to S Project Driveway	61.9	62.2	0.2	3.0	No

Number	Roadway	Segment Description	Predicted DNL			Significance Threshold ¹	Threshold Exceeded? ^{2,3}
			Existing	Existing + Project	Increase		
11	W Elkhorn Boulevard	S Project Driveway to Marysville Boulevard	61.9	57.8	0.0	3.0	No
12	Marysville Boulevard	W Elkhorn Boulevard to E Project Driveway	53.7	54.9	1.2	5.0	No
13	Marysville Boulevard	North of E Project Driveway	53.7	53.7	0.0	5.0	No

Notes:

1. Significance thresholds established by FICON.
2. All roadway segments would have adjacent sensitive receptors identified as existing residential uses.
3. A significant impact is identified only along segments where the project-related traffic noise level increase would exceed threshold AND where sensitive receptors are present along the roadway segment.

Source: Environmental Noise and Vibration Assessment, prepared by Bollard Acoustical Consultants (2025).

Based on the analysis presented in Table IS-17, project-generated traffic noise level increases would not result in significant noise impacts at existing noise-sensitive receptors located along the project area roadway network. As a result, this impact is identified as being less than significant.

Off-Site Noise Impacts Associated with Project On-Site Operations

The project includes the development of a building containing a combination convenience store/gas station and retail use, two quick serve restaurants with drive-through services, car wash, and vehicle vacuum system. Noise generated by those operations were quantified through a combination of reference noise level data and application of accepted noise modeling techniques.

The primary noise sources associated with on-site operations have been identified as passenger vehicle circulation (i.e., vehicle passbys through parking areas), delivery truck circulation (i.e., medium and heavy truck passbys), truck delivery activities (i.e., loading and unloading of product at building storefront), convenience store/gas station air/water unit, car wash operations, vacuum system equipment, quick service restaurant drive-through operations (i.e., amplified menu speaker board and vehicle idling/passbys), and rooftop mechanical equipment (HVAC).

The following section includes impact discussions for each of the above-identified on-site project noise sources. The County's exterior and interior noise level standards for non-transportation noise sources affecting residential uses are to be applied at the property lines of nearby Agricultural Residential (AR) and Residential (RD) properties.

However, in terms of determining the ambient noise increases due to project on-site operations, an impact would occur if those activities were to noticeably increase ambient noise levels above background levels at existing sensitive receptors. The adjacent parcels to the west and north of the project site, APNs: 214-0021-028 and 214-0350-002 (respectively), are zoned AR and do not contain residences (i.e., existing noise-sensitive receptors). Agricultural residential zoned parcels that only contain agricultural uses are typically not considered to be noise-sensitive (often noise-generating). As a result, for the analysis of increases in ambient noise levels associated with project on-site operations, a noticeable increase is assumed to occur where those activities would result in an increase by 5 dB or more over ambient noise levels at existing nearby residences.

Finally, the following analyses of on-site project noise exposure at nearby residential uses include consideration of shielding that would be provided by a proposed 8 foot-tall Concrete Masonry Unit (CMU) wall constructed along the northern project property boundary. The construction of an 8-foot-tall noise barrier would provide approximately 5 dB to 8 dB of on-site operations noise level reduction depending on the location and proximity of the receiving residential use to the on-site noise source.

Combined Project Operations Noise Levels at Nearby Residential Uses

Less than Significant with Mitigation. The following discussion of operational noise impacts summarizes the findings from the Environmental Noise and Vibration Assessment, prepared by Bollard Acoustical Consultants (2025). For further details on individual on-site operational noise sources, see Appendix B.

The calculated cumulative (combined) median (L_{50}) and highest predicted maximum (L_{max}) noise levels from project operations at the property lines of nearby agricultural residential and residential parcels are presented in Tables IS-18, IS-19, IS-20, and IS-21. In the tables shown below, noise level calculations varied on where the on-site noise source was located in relation to nearby agricultural residential and residential properties. The distance from the closest on-site noise sources to the relative property lines of the nearby receptors are as follows: the agricultural residence to the south (APN 214-0102-001) would be 135 feet at the closest; the agricultural residence to the southwest (APN 214-0101-006) would be 230 feet at the closest; the agricultural residential property to the west (APN 214-0021-028) would be 115 feet at the closest; the agricultural residential property to the north (APN 214-0350-002) would be 20 feet at the closest; the residence to the northeast (APN 214-0320-020) would be 190 feet at the closest; the residence to the northeast (APN 214-0320-021) would be 140 feet at the closest; and the residence to the east (APN 214-0022-025) would be 105 feet at the closest. These values only represent the distances from the property lines of receptors to the closest respective source of on-site noise and are not representative of the distances that all calculations were based on. The project's car wash drying assembly noise exposure is predicted to exceed the County's daytime and nighttime exterior noise level standards at a portion of the property lines of adjacent agricultural residential and residential zoned properties and therefore requires the implementation of Mitigation Measures NOI-1 (car wash dryer assembly noise reduction), NOI-2 (car wash tunnel interior materials noise reduction), and NOI-3 (car wash operations daytime hours restriction). Furthermore, the proposed vacuum system noise exposure is predicted to exceed the County's nighttime exterior noise level standard at a portion of the property lines of adjacent agricultural residential and residential zoned properties and therefore requires the implementation of Mitigation Measure NOI-4 (car wash vacuum operations daytime hours restriction). The results presented in the following tables include implementation of mitigation measures NOI-1 through NOI-4.

Table IS-18: Combined On-Site Operations Noise Levels at Nearby Residential Uses (Mitigated) – Daytime Median (L₅₀)

APN	Predicted Noise Levels, L ₅₀ (dB)								Calculated Cumulative, L ₅₀ (dB) ¹	General Plan Daytime Noise Standard, L ₅₀ (dB)	Exceed Standard?
	Vehicle Circ.	Truck Circ.	Truck Deliveries	Air/Water Unit	Car Wash Dryers	Vacuums	Drive-Through	HVAC			
214-0102-001	40	41	39	38	49	51	29	40	54	55	No
214-0101-006	35	31	37	25	39	41	26	36	46		No
214-0021-028	40	34	42	25	40	40	31	41	48		No
214-0350-002	39	37	39	27	52	46	37	46	54		No
214-0320-020	36	31	33	26	42	43	17	39	47		No
214-0320-021	38	39	40	33	42	43	17	42	49		No
214-0022-025	41	44	40	38	35	48	21	41	51		No
Note:											
1. Calculated cumulative (combined) median (L50) noise levels include implementation of all mitigation measures and recommendations previously outlined in this report.											
Source: Environmental Noise and Vibration Assessment, prepared by Bollard Acoustical Consultants (2025).											

Table IS-19: Highest Predicted On-Site Operations Noise Levels at Nearby Residential Uses (Mitigated) – Daytime Maximum (L_{max})

APN	Predicted Noise Levels, L _{max} (dB)								Highest Predicted, L _{max} (dB) ¹	General Plan Daytime Noise Standard, L _{max} (dB)	Exceed Standard?
	Vehicle Circ.	Truck Circ.	Truck Deliveries	Air/Water Unit	Car Wash Dryers	Vacuums	Drive-Through	HVAC			
214-0102-001	50	65	59	--	--	--	40	--	65	75	No
214-0101-006	45	50	56	--	--	--	37	--	56		No
214-0021-028	50	53	61	--	--	--	43	--	61		No
214-0350-002	49	57	59	--	--	--	50	--	59		No
214-0320-020	46	55	52	--	--	--	29	--	55		No
214-0320-021	48	63	59	--	--	--	29	--	63		No
214-0022-025	51	68	60	--	--	--	33	--	68		No
Note:											
1. Highest predicted maximum (Lmax) noise levels include implementation of all mitigation measures.											
Source: Environmental Noise and Vibration Assessment, prepared by Bollard Acoustical Consultants (2025).											

Table IS-20: Combined On-Site Operations Noise Levels at Nearby Residential Uses (Mitigated) – Nighttime Median (L₅₀)

APN	Predicted Noise Levels, L ₅₀ (dB)								Calculated Cumulative, L ₅₀ (dB) ¹	General Plan Nighttime Noise Standard, L ₅₀ (dB)	Exceed Standard?
	Vehicle Circ.	Truck Circ.	Truck Deliveries	Air/Water Unit	Car Wash Dryers	Vacuums	Drive-Through	HVAC			
214-0102-001	37	41	39	38	--	--	28	40	47	50	No
214-0101-006	32	31	37	25	--	--	24	36	41		No
214-0021-028	37	34	42	25	--	--	30	41	46		No
214-0350-002	36	37	39	27	--	--	37	46	48		No
214-0320-020	33	31	33	26	--	--	16	39	42		No
214-0320-021	35	39	40	33	--	--	16	42	46		No
214-0022-025	38	44	40	38	--	--	20	41	48		No
Note: 1. Calculated cumulative (combined) median (L50) noise levels include implementation of all mitigation measures. Source: Environmental Noise and Vibration Assessment, prepared by Bollard Acoustical Consultants (2025).											

Table IS-21: Highest Predicted On-Site Operations Noise Levels at Nearby Residential Uses (Mitigated) – Nighttime Maximum (L_{max})

APN	Predicted Noise Levels, L _{max} (dB)								Highest Predicted, L _{max} (dB) ¹	General Plan Nighttime Noise Standard, L _{max} (dB)	Exceed Standards?
	Vehicle Circ.	Truck Circ.	Truck Deliveries	Air/Water Unit	Car Wash Dryers	Vacuums	Drive-Through	HVAC			
214-0102-001	50	65	59	--	--	--	40	--	65	70	No
214-0101-006	45	50	56	--	--	--	37	--	56		No
214-0021-028	50	53	61	--	--	--	43	--	61		No
214-0350-002	49	57	59	--	--	--	49	--	59		No
214-0320-020	46	55	52	--	--	--	29	--	55		No
214-0320-021	48	63	59	--	--	--	29	--	63		No
214-0022-025	51	68	60	--	--	--	33	--	68		No
Note: 1. Highest predicted maximum (L _{max}) noise levels include implementation of all mitigation measures. Source: Environmental Noise and Vibration Assessment, prepared by Bollard Acoustical Consultants (2025).											

It should be noted that due to the logarithmic nature of the decibel scale, the sum of two noise values which differ by 10 dB equates to an overall increase in noise levels of 0.4 dB. When the noise sources are equivalent, the sum would result in an overall increase in noise levels of 3 dB.

As indicated in Tables 18 through 21, with the incorporation of mitigation measures NOI-1 through NOI-4, calculated combined median (L_{50}) and highest predicted maximum (L_{max}) noise levels from project on-site operations would comply with the Sacramento County General Plan daytime and nighttime median (L_{50}) and maximum (L_{max}) noise level standards at the property lines of the nearby agricultural residential and residential parcels. The calculated noise levels include implementation of all mitigation measures NOI-1 through NOI-4, described below. In addition, based on the predicted exterior property line noise levels provided in Tables 18 through 21, and after consideration of the exterior to interior noise level reduction typically provided by standard residential construction (i.e., at least 25 dB with windows closed and approximately 15 dB with windows open), noise levels from combined/highest predicted on-site project operations are expected to comply with the General Plan's unadjusted day/night interior noise level standards of 35 dB L_{50} and 55 dB L_{max} within the nearest residences. This impact would be less than significant with mitigation.

Using the lowest average measured daytime and nighttime noise levels at each monitoring location during the Bollard Acoustical Consultants ambient noise surveys, ambient plus combined (and highest predicted) project noise level increases were calculated at the outdoor activity areas of the identified nearby existing residences. The results of those calculations are summarized in Tables IS-22 and IS-23.

Table IS-22: Increases in Ambient L_{50} Noise Levels at Nearby Residential Uses

Residence	Combined Ambient Noise Level Increase, L_{50} (dB)		Increase Significance Criterion, L_{50} (dB)		Exceed Significance Criteria?
	Daytime	Nighttime	Daytime	Nighttime	
1	0.6	1.6	5.0	5.0	No
2	0.4	1.2			No
3	0.2	0.6			No
4	2.5	1.3			No
5	1.6	1.3			No
6	2.2	2.9			No
7	2.6	3.4			No

Source: Environmental Noise and Vibration Assessment, prepared by Bollard Acoustical Consultants (2025).

As shown in Tables IS-22 and IS-23, the combined median (L_{50}) and highest predicted maximum (L_{max}) noise level increases from project operations would be below the applied increase significance criterion of 5 dB.

Based on the analysis and results presented above, this impact is less than significant.

Table IS-23: Highest Predicted Increases in Ambient $L_{\max}$ Noise Levels at Nearby Residential Uses

Residence	Highest Ambient Noise Level Increase, L _{max} (dB)		Increase Significance Criterion, L _{max} (dB)		Exceed Significance Criteria?
	Daytime	Nighttime	Daytime	Nighttime	
1	0.2	0.4	5.0	5.0	No
2	0.1	0.2			No
3	0.1	0.1			No
4	0.1	0.1			No
5	<0.1	0.1			No
6	0.2	0.6			No
7	0.6	1.4			No
Source: Environmental Noise and Vibration Assessment, prepared by Bollard Acoustical Consultants (2025).					

- b. Would the project generation of excessive groundborne vibration or groundborne noise levels?

Construction

Less than Significant. During project construction, heavy equipment would be used for grading, excavation, paving, and building construction, which would generate localized vibration in the immediate vicinity of those activities. The nearest off-site existing structures have been identified as relatively newer engineered residences (i.e., not highly susceptible to damage by vibration).

Table IS-24 includes the range of vibration levels for equipment commonly used in general construction projects at a distance of 25 feet, as well as data projected equipment vibration levels at the nearest off-site existing structures.

As shown in Table IS-24, vibration levels generated from on-site construction activities are below the FTA threshold for damage to engineered structures (98 VdB) at a reference distance of 25 feet from those activities. In addition, the construction-related vibration levels shown in Table IS-24 are predicted to be below the strictest impact level criterion of 72 VdB for residences. Finally, the construction-related vibration levels shown in Table 26 are predicted to be generally below the human threshold of perception (65 VdB) at the nearest residential structures. Based on the analysis provided above, on-site construction within the project area is not expected to result in excessive groundborne vibration levels at nearby existing residences. This impact would be less than significant.

Table IS-24: Summary of Construction Equipment Predicted Vibration Levels at Nearby Existing Residences

Equipment	Reference Maximum Vibration Level at 25', VdB (rms)	Predicted Equipment Vibration Level at Residences, L _{max} (dB)						
		Res 1 (190')	Res 2 (230')	Res 3 (390')	Res 4 (215')	Res 5 (180')	Res 6 (115')	Res 7 (125')
Vibratory Roller	94	64	59	59	59	58	57	<55
Hoe Ram	87	61	57	57	57	56	55	<55
Large Bulldozer	87	57	55	55	55	<55	<55	<55
Caisson drilling	87	61	59	59	59	58	55	<55
Loaded Trucks	86	63	60	60	60	59	57	<55
Jackhammer	79	70	62	62	62	61	58	<55
Small bulldozer	58	68	61	61	61	60	57	<55
<i>Notes: RMS velocity in decibels (VdB) re micro-inch/second.</i> <i>Source: Environmental Noise and Vibration Assessment, prepared by Bollard Acoustical Consultants (2025).</i>								

Operations

Less than Significant. During site visits by Bollard Acoustical Consultants Inc. on September 26 and October 2, 2023, it was noted that vibration levels were below the threshold of perception within the project area. The project's operations would include typical commercial-grade stationary mechanical and electrical equipment for the proposed land uses, such as air handling units, condenser units, and exhaust fans, which would produce vibration. Groundborne vibration generated by each of the above-mentioned activities would generate approximately up to 0.005 inch-per-second PPV adjacent to the Project Site.¹⁵³ Thus, the potential vibration levels from the proposed project's operational sources at the closest sensitive receptor locations would be less than the threshold of perceptibility of 0.01 inch-per-second PPV.

Because vibration levels due to and upon the project are expected to be satisfactory relative to the applicable FTA vibration impact criteria for damage to structures and annoyance, this impact would be less than significant.

- c. *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

The project area is located approximately 1¼ miles northwest of Rio Linda Airport (private airstrip). According to the *Land Use Compatibility Guidelines for Safety* contained in the Rio Linda Airport Comprehensive Land Use Plan (Rio Linda ACLUP), Auto and Truck Service Stations, Fuel Dealers, Eating and Drinking, and Retail land uses (such as those uses proposed by the project) are compatible within the "Overflight Zone", and not compatible within the "Clear Zone" or "Approach-Departure Zone". The Airport Safety Zones Map

¹⁵³ This vibration estimate is based on data presented in the Federal Transit Administration, 2018.

(Figure 9 of the Rio Linda ACLUP) and the project location is included in the Environmental Noise and Vibration Assessment, prepared by Bollard Acoustical Consultants (2025).

Pursuant to Policy NO-2 of the Sacramento County General Plan, proposals for new development within Sacramento County which may be affected by aircraft noise shall be evaluated relative to General Plan Table 4. General Plan Table 4 establishes an acceptable exterior noise level environment of up to 80 dB CNEL (or DNL) for the proposed land use types affected by airport noise. As shown in Table 10, measured ambient day-night average (DNL) noise levels within the project area ranged from 57 to 66 dB DNL during the 120-hour monitoring period. Although the ambient noise measurements obtained during the 120-hour monitoring period likely included aircraft associated with operations at Rio Linda Airport, it is believed that the ambient noise level environment at the project site is primarily attributed to local roadway traffic.

Based on the information above, the results from the ambient noise level surveys within the project area, and after consideration of the exterior to interior noise level reduction achieved with standard building construction (at least 25 dB with windows closed and approximately 15 dB with windows open), noise generated from normal aircraft operations at the Rio Linda Airport are expected to satisfy the applicable Sacramento County General Plan exterior noise level criteria within the proposed uses of the development. Therefore, the Project would not expose people residing or working in the project area to excessive noise levels, and this impact is less than significant.

ENVIRONMENTAL MITIGATION MEASURES

To satisfy the County's exterior daytime median (L_{50}) noise level standard at the property lines of nearby agricultural residential and residential parcels, avoid the potential for an exceedance of the County's exterior nighttime median (L_{50}) noise level standard at those locations, and to avoid the potential for significant increases in ambient daytime and nighttime noise levels at those locations, the following specific noise mitigation measures would be required of the project:

MITIGATION MEASURE NOI-1: CAR WASH DRYING ASSEMBLY

The proposed car wash drying assembly shall be configured with equipment manufacturer-recommended full cover surrounds or silencer cones. According to the equipment manufacturer (Premier Systems), the installation of full cover surrounds or silencer cones reduces dryer sound levels by approximately 5 dB. Prior to occupancy, a noise study shall be conducted demonstrating that all car wash drying assembly equipment (as installed) meets the Sacramento County General Plan daytime and nighttime median (L_{50}) and maximum (L_{max}) noise standards at the property lines of the nearby residential properties.

MITIGATION MEASURE NOI-2: CAR WASH TUNNEL INTERIOR MATERIALS

The interior car wash tunnel and exit vestibule walls shall be lined with sound absorptive material. Specifically, the material should cover a minimum of 75 percent of available wall space within the exit vestibule area and the last 25 feet of the car wash tunnel building (i.e., closest to dryers and exit). The material should have a Noise Reduction Coefficient (NRC) rating of 1.0 and should be most effective for noise sources having a frequency content above 500 Hz. An example of such a product is provided within the Environmental Noise and Vibration Assessment

(see Appendix B). The introduction of absorptive material as specified above is estimated to provide approximately 4 dB of blower noise attenuation. Prior to the approval of the building permit, a noise study shall be conducted demonstrating that all equipment and materials (as installed) meets the Sacramento County General Plan daytime and nighttime median (L50) and maximum (Lmax) noise standards at the property lines of the nearby residential properties.

MITIGATION MEASURE NOI-3: CAR WASH OPERATIONS

All project car wash operations shall occur during daytime hours only (7:00 a.m. to 10:00 p.m.).

MITIGATION MEASURE NOI-4: CAR WASH VACUUM OPERATIONS

All project vacuum operations shall occur during daytime hours only (7:00 a.m. to 10:00 p.m.).

XV. POPULATION AND HOUSING

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

ENVIRONMENTAL SETTING

Population growth is considered in the context of local and regional population, housing, and employment projections. Generally, a project that induces population growth is not viewed as having a significant impact on the environment unless the physical changes needed to accommodate project-related population growth would have adverse impacts on the environment. CEQA Guidelines section 15064(e) states that an economic or social change by itself would not be considered a significant effect on the environment.

Indirect environmental impacts include growth-inducing effects, such as ways a project could foster economic or population growth or the construction of additional housing.¹⁵⁴ Projects that would remove obstacles to population growth (e.g., a major expansion of a wastewater treatment plant) might, for example, allow development to occur in an area that was not previously considered feasible for development because of infrastructure limitations.¹⁵⁵ Because implementation of the proposed project would not include new housing, this analysis focuses on potential impacts related to population and housing as a result of new permanent employment from the proposed project.

The project site is currently undeveloped with vegetation characterized by unmaintained native grasses. The project site is located within unincorporated Sacramento County in an agricultural-residential community consisting of a mixture of residential and agricultural uses.

IMPACT DISCUSSION

- a. *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

Less than Significant. The proposed project would involve construction of a gas station, convenience store, retail space, and a car wash on Lot 1. Lots 2 and 3 may be developed with quick service restaurants on each parcel in the future.

¹⁵⁴ CEQA Guidelines section 15064(d)(2).

¹⁵⁵ CEQA Guidelines section 15126.2(d).

Construction

The proposed project would result in a temporary increase in construction workers onsite during the approximately 11-month construction period. According to the California Employment Development Department, Sacramento County had an annual average of 44,200 construction jobs in 2023.¹⁵⁶ The proposed project's workforce demand would be small relative to the county labor supply. Although some workers might relocate from other areas, the population increase would be negligible and temporary, limited to the construction period. Furthermore, given the varied skills represented in the county labor market, the demand for construction employment would likely be met within the County's existing and projected labor market.

Construction industry jobs generally have no regular place of business, and many construction workers are highly specialized (e.g., forklift operators, electricians). Thus, construction workers' commutes to job sites throughout the county may change several times a year, as dictated by demand for their specific skills. The work requirements of most construction projects are also highly specialized, and workers are employed on a job site only as long as their skills are needed to complete a particular construction task. It is anticipated that construction workers not already living in the project vicinity or Sacramento County would commute from their residences elsewhere rather than permanently relocating to the project vicinity from more distant locations. Because this type of construction work is temporary, filling these jobs with existing residents in the project vicinity is typical for employers in various construction trades. Once construction is complete, construction workers typically seek employment at other job sites in the region that require their particular skills.

Thus, construction of the proposed project would not generate a substantial permanent population increase in the project vicinity or County. Construction of the proposed project would not directly or indirectly induce substantial unplanned population growth or require the construction of housing to accommodate such growth. Therefore, this impact would be less than significant.

Operation

In general, a project would be considered growth-inducing if its implementation were to result in substantial population increases and/or new development that might not occur if the project were not implemented. As mentioned above, project-related growth-inducing effects include ways in which a project could foster economic or population growth or the construction of additional housing, either directly or indirectly. Projects that would remove obstacles to population growth (e.g., a major expansion of a wastewater treatment plant) might, for example, indirectly allow development to occur in an area that was not previously considered feasible for development because of infrastructure limitations.¹⁵⁷

The proposed project would employ a minimal number of people to operate the gas station, convenience store, retail space, car wash, and restaurants, but would not introduce new residents since no housing is proposed. Therefore, the impacts to population growth in the project area would be less than significant.

¹⁵⁶ California Employment Development Department, 2025. *Employment by Industry Data*. Available at: <https://labormarketinfo.edd.ca.gov/data/employment-by-industry.html>. Accessed July 17, 2025.

¹⁵⁷ CEQA Guidelines section 15126.2(d).

- b. *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

No Impact. The project site is currently undeveloped, as such, the proposed project would not displace existing residents or housing that would necessitate the construction of replacement housing elsewhere. Therefore, the proposed project would not result in an impact that would displace existing residents or housing.

ENVIRONMENTAL MITIGATION MEASURES

None recommended.

XVI. PUBLIC SERVICES

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☒	☐

ENVIRONMENTAL SETTING

The project site is surrounded by residential and agricultural uses. The site is in an unincorporated area of Sacramento County and is bordered by a single-family residential unit and open space to the north, Marysville Boulevard to the east, West Elkhorn Boulevard to the south, and undeveloped agricultural-residential properties to the west. Consideration of the demand for public services and facilities resulting from the proposed project are discussed below.

FIRE PROTECTION SERVICES

The Sacramento Metropolitan Fire District (SMFD) provides fire protection and emergency medical services to a population of over 720,000 in a 359 square mile service area, which includes the project site.¹⁵⁸ The project site is located within Division 1 and the closest fire station is Station 11, located at 6609 Rio Linda Boulevard, approximately 0.7-mile northwest of the project site.¹⁵⁹

POLICE PROTECTION SERVICES

The Sacramento County Sheriff's Office provides police protection services to the project site. The project site is located within the North Division, North West District 1. The North Division provides law enforcement services to the northern portion of Sacramento County, and serves the following communities: Antelope, Arden-Arcade, Carmichael, Elverta, Fair Oaks, Foothill

¹⁵⁸ Sacramento Metropolitan Fire District (SMFD), 2025. *About Us*. Available at: <https://metrofire.ca.gov/about-us-1a73b00>. Accessed July 17, 2025.

¹⁵⁹ SMFD, 2025. *Interactive Division Boundary Map*. Available at: <https://metrofire.ca.gov/interactive-division-boundary-map>. Accessed July 17, 2025.

Farms, McClellan Park, North Highlands, Rio Linda, and Orangevale. The Sheriff's Office Community Services Building, located at 4510 Orange Grove Avenue, approximately 6.5 miles southeast of the project site provides services for all North Area locations.¹⁶⁰

SCHOOLS

The project site is within the Twin Rivers Unified School District (TRUSD). The TRUSD serves approximately 25,000 students in northern Sacramento County and includes 49 schools, consisting of 30 elementary schools, five middle schools, four comprehensive high schools, three charter schools, and seven alternative schools.¹⁶¹ The project site is within the attendance area of Westside Elementary School located at 6537 West 2nd Street, approximately 350 feet northeast of the project site; Rio Linda Preparatory Academy Middle School located at 1101 G Street, approximately 1.46-mile east of the project site; and Rio Linda High School, located at 6309 Dry Creek Road, approximately 1.64-mile east of the project site.¹⁶²

PARKS

The Sacramento County's Department of Regional Parks maintains and operates more than 15,000 acres of parks throughout the County.¹⁶³ Sacramento County Parks also operates parks within the Rio Linda Elverta Recreation and Park District boundaries, including the large multipurpose regional Dry Creek Parkway, located approximately 0.89-mile east, and Gibson Ranch Park, located approximately 4.2-miles northeast.

The project site is within the Rio Linda Elverta Recreation and Park District (District), which became an independent park district in 1994. The District's duties include managing, maintaining, and programming the District's parks and facilities, developing and monitoring the budget, carrying out the policies of the Board, and overseeing the daily operations of the District. Except for some support services provided by Sacramento County, such as accounting and tax collection, the District is an independent District.¹⁶⁴ The closest District parks to the project site include Westside Park, located approximately 0.33-mile northeast of the project site, and Depot Park, located 1.1-miles northeast of the project site.¹⁶⁵

The City of Sacramento's Youth, Parks, and Community Enrichment Department (YPCE) and the City of Sacramento maintain over 4,300 acres of parks, parkways, and open space including Ueda Parkway, located approximately 0.95-mile southwest of the project site.¹⁶⁶

¹⁶⁰ Sacramento County Sheriff's Office, 2025. *North Division*. Available at: https://www.sacsheriff.com/pages/north_division.php. Accessed July 17, 2025.

¹⁶¹ Twin Rivers Unified School District (TRUSD), 2025. *About Us*. Available at: <https://www.trusd.net/Our-District/About-Us/index.html>. Accessed July 17, 2025.

¹⁶² TRUSD, 2025. *Twin Rivers Unified School District My School Locator*. Available at: <https://www.trusd.net/StudentsFamilies/Parent-Resources/FIND-YOUR-SCHOOL/>. Accessed July 17, 2025.

¹⁶³ Sacramento County Regional Parks, 2025. *About Us*. Available at: <https://regionalparks.saccounty.gov/Pages/AboutUs.aspx>. Accessed July 17, 2025.

¹⁶⁴ Rio Linda Elverta Recreation and Park District, 2022. *Recreation and Park Master Plan*. Available at: <https://www.rleparks.com/files/eab43ea8b/Master+Plan+-+Final+Adopted.pdf>. Accessed September 23, 2025.

¹⁶⁵ Sacramento County Regional Parks, 2025. *Your Sacramento Area Parks*. Available at: <https://sacramentocounty.maps.arcgis.com/apps/webappviewer/index.html?id=473d8a66b49243e1aa3732a4bdbd6936>. Accessed July 17, 2025.

¹⁶⁶ Ibid.

LIBRARY SERVICES

The Sacramento Public Library operates 28 libraries and two book mobiles which serve 1.4 million residents. The library closest to the project site is the Rio Linda Library, located at 6724 6th Street, approximately 1.0 mile northeast of the project site.¹⁶⁷

IMPACT DISCUSSION

- a. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services such as fire protection, police protection, schools, parks, or other public facilities:*

Less than Significant. The proposed project would involve construction of a gas station, convenience store, retail space, car wash, and two quick service restaurants.

The proposed project would result in a more intensive use at the project site compared to existing conditions. Therefore, it would incrementally increase the need for fire and emergency medical services, and possibly police services, as a result of the increased activity on the project site during construction. While incidents could occur during construction, they would be temporary and response would be routine for local fire and police departments, as construction projects are common across the County.

Operation of the proposed project would introduce a minimal number of new employees to the project site for the gas station, convenience store, retail space, car wash, and two quick service restaurants. These new employees could increase the demand for fire and police protection services in the area. However, the project site is in the existing fire, emergency medical, and police services service areas and these employees would likely be existing County residents who are already accounted for in the consideration of demand for fire and police protection services. Additionally, SMFD and Sacramento County Building Permits and Inspection would review building plans to ensure that the proposed buildings comply with the latest California Building Code requirements for fire and life safety measures as specified in the Sacramento County Code. These requirements include measures related to emergency access and egress; fire hydrants and sprinkler systems; fire-rated design, construction, and materials; restrictions on occupant loads; emergency lighting; smoke alarms; and mechanical smoke control and emergency notification systems. The project applicant would work with SMFD to determine utility and access requirements for fire protection and emergency services at the project site. Adherence to Sacramento County Code requirements related to fire protection as part of the project design would minimize demand for future fire protection services.

As discussed in Section XV, *Population and Housing*, the proposed project would not result in new residents. Since the demand for schools, parks, and library facilities is determined by the number of residents in an area, the demand for such facilities would not be affected by the implementation of the proposed project. There would be no need for the construction of

¹⁶⁷ Sacramento Public Library, 2024. *Annual Report FY 2023-2024*. Available at: <https://www.saclibrary.org/Saclibrary/media/MediaAssets/2023-24-Annual-Report-9x7-DIGITAL.pdf>. Accessed July 17, 2025.

new facilities which could cause significant environmental impacts. Therefore, the impact would be less than significant.

ENVIRONMENTAL MITIGATION MEASURES

None recommended.

XVII. RECREATION

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

ENVIRONMENTAL SETTING

As discussed in Section XVI, *Public Services*, the Sacramento County's Department of Regional Parks maintains and operates more than 15,000 acres of parks throughout the County including the large multipurpose regional Dry Creek Parkway and Gibson Ranch Park.¹⁶⁸ Additionally, the independent Rio Linda Elverta Recreation and Park District (District) manages and maintains the District's parks and facilities including Westside Park located approximately 0.33-mile northeast of the project site and Depot Park, located 1.1-miles northeast of the project site.¹⁶⁹ Furthermore, the City of Sacramento and the City's Youth, Parks, and Community Enrichment Department maintains Ueda Parkway, located approximately 0.95-mile southwest of the project site.¹⁷⁰

Currently, the project site is undeveloped. No neighborhood, local, or regional parks or other recreational facilities are present on the site.

IMPACT DISCUSSION

- a. *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*

Less than Significant. The proposed project does not include residential or other land uses that would increase the residential population in the project area. Construction of the proposed project could result in a temporary increase in the use of existing recreational facilities as a result of onsite construction workers. As discussed in Section XV, *Population and Housing*, construction of the proposed project would be temporary and would not induce substantial population growth which could increase the use of the existing parks or other

¹⁶⁸ Sacramento County Regional Parks, 2025. *About Us*. Available at: <https://regionalparks.saccounty.gov/Pages/AboutUs.aspx>. Accessed July 17, 2025.

¹⁶⁹ Sacramento County Regional Parks, 2025. *Your Sacramento Area Parks*. Available at: <https://sacramentocounty.maps.arcgis.com/apps/webappviewer/index.html?id=473d8a66b49243e1aa3732a4bdbd6936>. Accessed July 17, 2025.

¹⁷⁰ Ibid.

recreational facilities such that physical deterioration of the facilities would occur or be accelerated. Operation of the proposed project would introduce a minimal number of employees at the project site; however, employees would be expected to use park facilities less than residents. Furthermore, these employees would likely be existing County residents who are already accounted for in the consideration of demand for parks and recreational facilities. Therefore, the proposed project would not result in the increased use or physical deterioration of other recreational facilities, and this impact would be less than significant.

- b. *Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

No Impact. The proposed project would involve the construction of a gas station, convenience store, retail space, a car wash, and two quick service restaurants, as well as associated site access improvements. The proposed project would not include recreational facilities or require the construction or expansion of recreational facilities that may have an adverse physical effect on the environment. Therefore, the proposed project would have no impact related to the construction or expansion of recreational facilities.

ENVIRONMENTAL MITIGATION MEASURES

None recommended.

XVIII. TRANSPORTATION

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	☒
b. Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b) – measuring transportation impacts individually or cumulatively, using a vehicles miles traveled standard established by the County?	☐	☐	☒	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

ENVIRONMENTAL SETTING

The project site is located in northern Sacramento County at the northwest intersection of Marysville Boulevard and West Elkhorn Boulevard. The project proposes a gas station with a convenience store as well as two quick service restaurants and associated uses on a 4.14-acre site comprised of two parcels. Ultimate project site access would be provided via three driveways: one right-in-right-out ingress/egress driveway on West Elkhorn Boulevard approximately 520 feet west of the Marysville Boulevard intersection, one right-in-right-out ingress/egress driveway on Marysville Boulevard, and one left-in/right-in-right out ingress/ egress driveway along the proposed right-of-way on the western boundary of the project site.

There are no designated paved pedestrian sidewalks in the immediate vicinity of the proposed project site. There are unpaved areas for pedestrian transportation along both West Elkhorn and Marysville Boulevard, and a pedestrian crosswalk at the intersection of these two roadways.

The nearest bicycle facility is a Class II bikeway along West Elkhorn Boulevard. This bikeway is directly adjacent to the project site.

There are no transit facilities immediately adjacent to the proposed project site. The nearest facilities are the Amtrak Capitol Corridor approximately 4.6 miles southeast of the site, which provides regional access from Auburn to San Jose; the Sacramento Regional Transit Bus Route 19, which is located approximately 0.3 miles east and provides service from Watt Avenue/Elverta Road to Arden Way/Del Paso Boulevard; and the Blue Line, which is located approximately 4.6 miles southeast and provides access through the City of Sacramento and further southwest.

REGULATORY SETTING

STATE

SENATE BILL 743

Senate Bill 743 (SB 743), passed in 2013, required the California Governor's Office of Land Use and Climate Innovation (LCI) to develop new CEQA guidelines that focus on vehicle miles traveled (VMT) instead of traditional traffic metrics like level of service (LOS). The updated guidelines took effect July 1, 2020, and mandated that VMT be the primary metric for transportation impacts under CEQA. Vehicular delay as measured by Level of Service (LOS) was eliminated as an environmental effect under CEQA. VMT measures miles traveled by vehicles within a region, emphasizing the use and efficiency of the transportation network.

CALIFORNIA STREET AND HIGHWAYS CODE SECTION 890.4

Existing bicycle facilities in the project area are classified as follows according to California Streets and Highways Code Section 890.4:

- **Class I bikeways** provide a completely separated right-of-way designated for the exclusive use of bicycles and pedestrians with crossflows by motorists minimized.
- **Class II bikeways** provide a restricted right-of-way designated for the exclusive or semi-exclusive use of bicycles with through travel by motor vehicles or pedestrians prohibited, but with vehicle parking and crossflows by pedestrians and motorists.
- **Class III bikeways** provide a right-of-way on-street or off-street, designated by signs or permanent markings and shared with pedestrians and motorists.
- **Class IV bikeways** promote active transportation and provide a right-of-way designated exclusively for bicycle travel adjacent to a roadway and separated from vehicular traffic. Types of separation include, but are not limited to, grade separation, flexible posts, inflexible physical barriers, or on-street parking.

LOCAL

SACOG MTP/SCS

The Sacramento Area Council of Governments (SACOG) is an association of local governments in the six-county Sacramento region. SACOG provides transportation planning and funding for the region and serves as a forum for the study and resolution of regional issues. In addition to preparing the region's long-range transportation plan, SACOG approves the distribution of affordable housing in the region and assists in planning for transit, bicycle networks, clean air, and airport land uses. In November 2019, the SACOG Board adopted the 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS), which provides a 20-year transportation vision and corresponding list of planned and programmed projects. The proposed project is consistent with the MTP/SCS programming policies of placing land uses in transportation efficient locations.

SACRAMENTO COUNTY GENERAL PLAN

The following goals and policies from the Sacramento County General Plan Circulation Element (amended October 25, 2022) are relevant to the proposed project:

- **Goal:** Provide a balanced and integrated roadway system that maximizes the mobility of people and goods in a safe and efficient manner.

Policy CI-8: Maintain and rehabilitate the roadway system to maximize safety, mobility, and cost efficiency.

Policy CI-10: Land development projects shall be responsible to provide improvements which address the project's adverse effects on local and regional roadways.

- **Goal:** Provide safe, continuous, efficient, integrated, and accessible bicycle and pedestrian systems that encourage the use of the bicycle and walking as a viable transportation mode and as a form of recreation and exercise.

Policy CI-32: Develop a comprehensive, safe, convenient, and accessible bicycle and pedestrian system that serves and connects the County's employment, commercial, recreational, educational, social services, housing, and other transportation modes.

IMPACT DISCUSSION

- a. *Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

No Impact. There are currently pedestrian crosswalk facilities along the Marysville Boulevard and West Elkhorn Boulevard intersection, and a dedicated bicycle lane along West Elkhorn Boulevard. The project would not implement roadway improvements that would affect long-term access to these pedestrian or bicycle facilities, or any transit facilities. The proposed project would construct pedestrian facilities through the gas canopy area and parking lots and would provide sidewalks along the adjacent roadways. A new transit stop will eventually be built along West Elkhorn Boulevard fronting the gas canopy area. Additionally, the project would provide bike lockers and bike racks onsite to accommodate visitors to the site utilizing the existing bike lanes. Operation of the proposed project would not conflict with the project site's surrounding roadway network. Further, construction of the proposed project would be consistent with adopted general plan goals and policies. Construction traffic is only expected to last for the 11-month period and would not affect the traffic operations of the project area. The project does not conflict with any applicable program, plan, ordinance, or policy addressing the circulation system, and there would be no impact.

- b. *Would the project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b) – measuring transportation impacts individually or cumulatively, using a vehicles miles traveled standard established by the County?*

Less than Significant. As part of the statewide implementation of SB 743, LCI settled upon automobile VMT as the preferred metric for assessing passenger vehicle-related impacts

under CEQA and issued revised CEQA Guidelines in December 2018, along with a Technical Advisory on Evaluating Transportation Impacts in CEQA to assist practitioners in implementing the CEQA Guidelines revisions. Additionally, the Sacramento County Traffic Impact Analysis Guidelines, implemented in 2025, were consulted regarding screening criteria and VMT analysis.

Because new retail development often redistributes trips rather than creating new travel demand, the LCI guidance recommends that lead agencies analyze the net change in VMT to indicate the transportation impact of retail projects.¹⁷¹ The potential for VMT impacts, according to this approach, hinges on whether the project can be considered local-serving or regional. By adding retail opportunities within existing neighborhoods, local-serving projects can shorten trips and reduce overall VMT. In contrast, regional destination retail projects would draw customers from larger trade areas, potentially substituting for shorter trips and increasing VMT. The LCI guidance suggests that any retail projects including stores larger than 50,000 square feet might be considered regional serving retail. The proposed project would provide a total of under 24,000 square feet between all uses, which fits the LCI classification of a local-serving project. To further this conclusion, there are three other gas stations within a two-mile radius of the project site. Thus, non-pass-by trips to the project would be anticipated to primarily originate from nearby locations as there are a variety of similar services provided in the project vicinity. For these reasons, additional VMT analysis is not required for the proposed project. VMT impacts associated with the proposed project would be less than significant.

- c. *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

Less than Significant. A Local Transportation Analysis (LTA) was prepared for the proposed project by Kimley-Horn in January 2026 and is attached as Appendix E. The LTA assessed site access, circulation, and queuing conditions associated with the proposed drive-through restaurants and automated car wash, focusing on both the storage capacity at driveways and internal queuing at each use.

The LTA includes a discussion of improvements which would be implemented as part of the project to address deficiencies. These include proposed improvements to the West Elkhorn Boulevard and West 2nd Street intersection which would result in the expansion of West Elkhorn Boulevard from two lanes to four lanes to resolve the deficiency of vehicles waiting on West 2nd Street to make a southbound lefthand turn, as well as improvements to West Elkhorn Boulevard from West 4th Street to Marysville Boulevard, which would result in the construction of full depth pavement along the project frontage on West Elkhorn Boulevard to provide necessary capacity.

Project implementation, including the described improvements, would not change the existing geometry of the West Elkhorn and Marysville Boulevard intersection. The skew would remain similar to existing conditions, and no hazardous features or incompatible uses would be introduced as a result of the project.

The analysis determined that anticipated queue lengths for both the drive-through and car wash lanes could be accommodated within the available on-site storage without affecting

¹⁷¹ Governor's Office of Land Use and Climate Innovation, 2018. Technical Advisory on Evaluating Transportation Impacts in CEQA.

circulation or operations on adjacent roadways. In addition to this conclusion, the following recommendations were included in the LTA:

1. Should drive-through queues consistently exceed capacity and affect traffic flows on adjacent streets, the operator should implement a queue management plan. A sample plan is included in Attachment F of the LTA.
2. Provide striping and signage at both driveways to reinforce the right-in/right-out operations that would be in effect at project opening.
3. Recommend extending driveway throat depths to provide additional on-site storage space.

The proposed project site plan includes adequate queuing areas for each operational component, and the driveway configurations are consistent with access and safety standards. The County Department of Transportation is expected to incorporate applicable recommendations from the LTA into Conditions of Approval related to proposed project improvements. Therefore, the project would not result in increased hazards or incompatible traffic design features, and impacts would be less than significant.

d. Would the project result in inadequate emergency access?

Less than Significant. The proposed project would be designed to accommodate vehicle traffic through the three proposed access points on the eastern, western, and southern boundaries of the project site. Further, the proposed project is designed for efficient vehicle circulation through the restaurant, gas station, and convenience store uses onsite. Emergency vehicles would thus be able to access all areas of the project site in a timely manner. The project area is surrounded by fairly traveled roadways to the south and east, facilitating emergency vehicle access from these directions. The proposed project would have adequate emergency access to and through the project site and would not impede emergency access on adjacent roadways. Therefore, the impact to emergency access is less than significant.

ENVIRONMENTAL MITIGATION MEASURES

None recommended.

XIX. TRIBAL CULTURAL RESOURCES

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 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), or	☐	☒	☐	☐
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 § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

ENVIRONMENTAL SETTING

The project site is situated within the lands traditionally occupied by the Valley Nisenan, or Southern Maidu. Many descendants of Valley Nisenan throughout the larger Sacramento region belong to the Buena Vista Rancheria of Me-Wuk Indians, Colfax-Todds Valley Consolidated Tribe, Lone Band of Miwok Indians, Shingle Springs Band of Miwok Indians, Tsi Akim Maidu, United Auburn Indian Community, and Wilton Rancheria Tribes. The tribes actively participate in the identification, evaluation, preservation, and restoration of tribal cultural resources.

Of these tribes, the Buena Vista Rancheria, Lone Band of Miwok Indians, Shingle Springs Band of Miwok Indians, United Auburn Indian Community, and Wilton Rancheria are federally recognized tribes. These tribes are comprised of Miwok and/or Maidu (Nisenan) tribal members who are traditionally and culturally affiliated with the project area. These tribes have deep spiritual, cultural, and physical ties to their ancestral land and are contemporary stewards of their culture and landscapes. The tribal community represents a continuity and endurance of their ancestors by maintaining their connection to their history and culture. It is their goal to ensure the preservation and continuance of cultural heritage for current and future generations.

INFORMATION SOURCES

The following discussion and analysis are supported in part by the NAHC results and information from consulting tribes, as applicable.

NATIVE AMERICAN CONSULTATION

The November 2023 results for the Native American Heritage Commission (NAHC) Sacred Lands Files search for the project were negative. On June 30, 2025, requests for consultation were sent to three (4) native nations who have requested to receive notice of consultation in accordance with AB-52: Lone Band of Miwok Indians, Shingle Springs Band of Miwok Indians, United Auburn Indian Community, and the Wilton Rancheria. Staff received one (1) response for consultation on the project. County staff met with tribal representatives on August 21, 2025, and conducted a tribal field survey of the project site on August 27, 2025. Consultation was officially closed on September 5, 2025. Tribal representatives requested mitigation associated with compensated construction monitoring by official tribal monitor during project construction.

IMPACT DISCUSSION

- a. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 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 § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?*

a.i/ii) **Less than Significant with Mitigation.** The results of the background research, survey, and tribal consultation efforts completed for the project site did not identify any tribal cultural resources, listed, or determined eligible for listing in the California Register, or included in a local register of historical resources as defined in PRC Section 5020.1(k), pursuant to PRC Section 21074(a)(1), within the project site or 0.25-mile radius. Additionally, the Sacred Lands File search results from the NAHC were negative.

If any previously unrecorded cultural materials were identified during ground-disturbing construction activities and were found to qualify as a tribal cultural resource pursuant to PRC Section 21074(a)(1) (determined to be eligible for listing in the California Register or in a local register of historical resources), any impacts to the resource resulting from the project could be potentially significant. However, with the implementation of Mitigation Measures CR-1 and CR-2 as described in Section VI. *Cultural Resources*, and Mitigation Measure TCR-1 this impact would be mitigated to less than significant. These mitigation measures would ensure that work halts in the vicinity of a find until a qualified archaeologist and consulting Native American tribes can make an assessment and provide additional recommendations if necessary. Tribal cultural resources impacts would be less than significant with mitigation.

ENVIRONMENTAL MITIGATION MEASURES

Implement Mitigation Measures CR-1: Unanticipated Discoveries of Cultural Resources and CR-2: Unanticipated Discoveries of Human Remains as listed in Section VI (Cultural Resources) above.

MITIGATION MEASURE TCR-1: COMPENSATED CONSTRUCTION MONITORING BY OFFICIAL TRIBAL MONITOR

The project is required to retain an official tribal monitor from the Wilton Rancheria to observe all ground disturbance activities to occur during the construction phase in accordance with the approved treatment plan:

1. **Communication Protocols for Monitoring:** The applicant shall develop a set of communication protocols, to the satisfaction of the County and tribes, to identify all points of contact and to ensure that tribes are notified when the applicant will proceed with authorized construction activities. Points of contact will be established for the applicant, construction supervisor, monitoring tribes, and County Archaeologist, and the contact numbers and email addresses must be documented and shared among all parties. These shall be included in the Tribal Monitoring and Discovery Treatment Plan. Points of contact are responsible for identifying backup representatives in the event they are unable to perform due to an absence or other reasons.
2. **Tribal Monitoring:** All construction-related ground-disturbing activities shall be monitored by a qualified tribal representative from Wilton Rancheria on this project to ensure that the procedures outlined in the Tribal Monitoring and Discovery Treatment Plan are addressed expeditiously and in accordance with the plan. The requirements for a monitor should be inclusive of all day and night construction activity that has the potential to result in ground disturbance. "Ground-disturbing activity" is defined herein as any activities that have the potential to disturb soil beyond that which was reasonably visible to tribal representatives and archaeologists during the pre-project pedestrian survey. This includes grading; trenching; excavation for below-ground utility installation or foundation work; and any other below-the-ground activities. Monitoring is not required for backfilling of previously excavated areas, placement of equipment into excavated areas, reseeding, or revegetation, re-grading or contouring of soil that was previously monitored, or for any aboveground project activity or construction that does not include ground disturbance, but monitors are allowed to observe upon request.

XX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider, which 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?	☐	☐	☒	☐
d. 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?	☐	☐	☒	☐
e. Result in substantial adverse physical impacts associated with the provision of storm water drainage facilities?	☐	☐	☒	☐
f. Result in substantial adverse physical impacts associated with the provision of electric or natural gas service?	☐	☐	☒	☐
g. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

ENVIRONMENTAL SETTING**WATER SUPPLY**

The Rio Linda/Elverta Community Water District is an independent publicly-owned special utilities district that provides water service to the Rio Linda and Elverta communities and relies on groundwater as its sole source of water supply. The District owns and operates 12 active wells, one elevated reservoir, one inline booster station, two pressure-reducing valve stations, a reservoir, and a pump station, which provide water to the surrounding communities. Some wells have had treatment added or been modified to improve performance. Well production capacity ranges from 450 to 900 gallons per minute (gpm) for the older wells and 1,500 to 2,800 gpm for the two newer wells (Well 16 and Well 15). The District's storage capacity includes one 10,000-gallon elevated reservoir and one 1,200,000-gallon reservoir. Well depths range from 267 to

590 feet with the oldest well drilled before the 1960s and newest well drilled in 2021, and all wells have a chlorine treatment at the wellhead.¹⁷²

California Water Code requires that urban water suppliers prepare and adopt an Urban Water Management Plan (UWMP) every five years. The most recent UWMP for the Rio Linda/Elverta Community Water District is the 2020 UWMP, which considers water demand for the Rio Linda and Elverta communities under normal, single dry year, and five consecutive dry year scenarios. Water supply and demand projections include anticipated future development through 2045.

WASTEWATER AND STORMWATER

The Sacramento Area Sewer District (SacSewer) is responsible for providing local sewer service to Sacramento County via the existing sanitary sewer collection system, and the treatment and disposal services for the entire Sacramento metropolitan area and surrounding areas, including the project site. SacSewer would be responsible for the conveyance of wastewater from the collection system to the Sacramento Regional Wastewater Treatment Plant (SRWTP).

Stormwater drainage for the project site and its vicinity would be collected by existing storm drain systems owned and managed by Sacramento County, and subsequently pumped into nearby rivers, creeks, and drainages. Stormwater would be conveyed via the proposed public trunk main storm drain system and associated closed-conduit storm drain infrastructure, as described in the accepted Level 3 Drainage Study. Runoff would be discharged to the existing downstream storm drainage system, including an existing 18-inch corrugated metal pipe (CMP) located approximately 270 feet west of the project boundary.

SOLID WASTE

Sacramento County's Department of Waste Management & Recycling (DWMR) regulates commercial solid waste collection services and recycling requirements for businesses located in the unincorporated areas of Sacramento County. Solid waste is transported to the Sacramento County North Area Recovery Station (NARS) before being transferred to the Sacramento County Kiefer Landfill.

ELECTRICITY AND NATURAL GAS

The Sacramento Municipal Utility District (SMUD) is responsible for the generation, transmission, and distribution of electrical power to its 900-square-mile service area, which includes most of Sacramento County, including unincorporated areas such as the project site and vicinity. SMUD buys and sells energy and capacity on a short-term basis to meet load requirements and reduce costs. The Pacific Gas & Electric Company (PG&E) provides natural gas service to residents and businesses within unincorporated Sacramento County, including the project site and vicinity. Existing SMUD utility poles fronting the project site along Elkhorn Boulevard would be removed and electrical lines would be placed underground.

¹⁷² Rio Linda Elverta Community Water District, 2022. *2020 Urban Water Management Plan for Rio Linda/Elverta Community Water District*. Available at: <https://rlecwdca.specialdistrict.org/files/a00c0bc7f/2020-RLECWD-UWMP-Final.pdf>. Accessed August 7, 2025.

REGULATORY SETTING

FEDERAL

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

The NPDES permit system was established in the CWA to regulate municipal and industrial point discharges to surface waters of the U.S. Each NPDES permit for point discharges contains limits on allowable concentrations of pollutants contained in discharges. Section 402 of the CWA contains general requirements regarding NPDES permits.

The CWA was amended in 1987 to require NPDES permits for non-point 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 NPDES stormwater regulations is to improve the quality of stormwater discharged to receiving waters to the “maximum extent practicable” through the use of structural and non-structural Best Management Practices (BMPs). BMPs can include the development and implementation of various practices including educational measures (workshops informing public of what impacts results when household chemicals are dumped into storm drains), regulatory measures (local authority of drainage facility design), public policy measures, and structural measures (filter strips, grass swales and detention ponds). The NPDES permits that apply to the proposed project are described in Section XI, *Hydrology and Water Quality*.

RESOURCE CONSERVATION AND RECOVERY ACT

The Resource Conservation and Recovery Act (RCRA), Subtitle D, contained in Title 42 of the United States Code Section 6901 et seq. contains regulations for municipal solid waste landfills and requires states to implement their own permitting programs incorporating the federal landfill criteria. The federal regulations address the location, operation, design, groundwater monitoring, and closure of landfills. The USEPA waste management regulations are codified in 40 CFR 239–282. The RCRA Subtitle D is implemented by Title 27 of the PRC, approved by the US EPA.

STATE

ASSEMBLY BILL 325

Assembly Bill (AB) 325, the Water Conservation in Landscaping Act of 1990, directs local governments to require the use of low-flow plumbing fixtures and the installation of drought-tolerant landscaping in all new development. Pursuant to the Water Conservation in Landscaping Act, the California Department of Water Resources developed a Model Water Efficient Landscape Ordinance.

ASSEMBLY BILL 939 (CALIFORNIA INTEGRATED WASTE MANAGEMENT ACT)

California AB 939 established the California Integrated Waste Management Board (CalRecycle), which required all California counties to prepare Integrated Waste Management Plans. In addition, AB 939 required all municipalities to divert 50 percent of all solid waste generated within the local agency’s service area by January 1, 2000. Diversion includes waste prevention, reuse, and recycling. SB 1016 revised the reporting requirements of AB 939 by implementing a per capita disposal rate based on a jurisdiction’s population (or employment) and its disposal.

CALIFORNIA GREEN BUILDING STANDARDS CODE

The California Green Building Standards Code (“CalGreen”) establishes mandatory green building standards for new and remodeled structures in California. These standards include a mandatory set of guidelines and more stringent voluntary measures for new construction projects, in order to achieve specific green building performance including recycling and/or salvage of 65 percent of nonhazardous construction and demolition debris.

Water and Wastewater. Part 11 of the Title 24 Building Energy Efficiency Standards is referred as the California Green Building Standards Code (CALGreen Code). The CALGreen Code is intended to encourage more sustainable and environmentally friendly building practices, conserve natural resources, and promote the use of energy-efficient materials and equipment. Since 2011, the CALGreen Code has been mandatory for all new residential and non-residential buildings constructed in the State. Mandatory measures related to water conservation include water-conserving plumbing fixture and appliance requirements, including flow rate maximums, compliance with State and local water-efficient landscape standards for outdoor potable water use in landscape areas, and recycled water systems, where available. The CALGreen Code was most recently updated in 2022 to include new mandatory measures for residential and non-residential uses; the 2022 amendments to the CALGreen Code became effective January 1, 2023.

Solid Waste. As amended, the CALGreen Code (California Code of Regulations Title 24, Part 11) requires that readily accessible areas be provided for recycling. The CALGreen Code also requires that projects recycle and/or salvage for reuse a minimum of 65 percent of their non-hazardous construction and demolition waste or comply with a local construction and demolition waste management ordinance, whichever is more stringent (Section 5.408.1). The 2016 version of the code increased the minimum diversion requirement for non-hazardous construction and demolition waste to 65 percent from 50 percent (in the 2013 and earlier versions) in response to AB 341, which declared the policy goal of the State that not less than 75 percent of solid waste generated would be source reduced, recycled, or composted by 2020.

IMPACT DISCUSSION

- a. *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*

Less than Significant. The project site is primarily an undeveloped parcel surrounded by residential and agricultural uses as well as vacant land. The proposed project would connect to existing utilities along West Elkhorn Boulevard and Marysville Boulevard. The proposed project would require construction of utility easements at the southern portion of the site and would include off-site storm drainage improvements, including a public trunk main storm drain system and associated conveyance improvements, as described in the hydrology and drainage analysis. However, the project is not expected to require relocation or expansion of off-site water, wastewater treatment, electric power, natural gas, or telecommunications facilities, and the proposed off-site storm drainage improvements would not cause significant environmental effects.

Water Infrastructure

Water supply would be provided by the Rio Linda/Elverta Community Water District (District). As described below in criteria (b), the District has sufficient water supplies to serve the proposed project. The proposed project would connect to the existing 8-inch water mains on either West Elkhorn Boulevard or Marysville Boulevard. The new water lines would be constructed in conformance with County standards, and its construction would not cause significant environmental effects. These considerations would result in a less-than-significant impact on water infrastructure.

Wastewater Infrastructure

SacSewer would provide local sewer service to the project site via the existing sanitary sewer collection system along West Elkhorn Boulevard via the installation of a new sewer line with a point of connection on W. 2nd Street, sized per the sewer purveyor's standards. The new lines would be constructed in accordance with SacSewer Standards and Specifications. Additionally, the project applicant would be required to pay sewer impact fees prior to the issuance of building permits to alleviate potential sewer impacts due to increased demand as well as infrastructure connection costs. These considerations would result in a less-than-significant impact on sewer infrastructure.

Stormwater Infrastructure

The proposed project would implement a drainage plan connecting to the existing drainage system along West Elkhorn Boulevard. Proposed stormwater infrastructure includes a public trunk main storm drain system along Marysville Boulevard and West Elkhorn Boulevard, associated inlets and closed-conduit storm drain infrastructure, and two bioretention ponds, as described in Section XI, Hydrology and Water Quality. Based on the accepted Level 3 Drainage Study, the existing downstream culvert beneath West Elkhorn Boulevard has adequate capacity, and upsizing of that culvert is not required as part of the proposed improvements.¹⁷³ The proposed infrastructure improvements would ensure that the project site accounts for its future drainage needs.

Furthermore, stormwater infrastructure would be constructed in compliance with the Sacramento Region Stormwater Quality Design Manual, the County Improvement Standards (Section 9: Storm Drain Design), and the goals and policies of the Sacramento County General Plan Public Facilities Element. Post-construction stormwater quality control measures will be incorporated into the project. Compliance with these requirements would reduce impacts to less than significant.

Electricity and Natural Gas

Construction of the proposed project would result in increased demand for electricity. Both SMUD and PG&E would install new distribution facilities, in accordance with applicable service requirements. Existing overhead utility facilities along the project frontage on West Elkhorn Boulevard, including SMUD utility poles, would be removed and electrical lines would be placed underground as part of project implementation. Any applicable requirements or conditions of approval from utility service providers would be addressed during final design and utility coordination. These providers would ensure adequate service to the project site, and impact would be less than significant.

¹⁷³ Core States Group, 2026. *Level 3 Drainage Study, ARCO at Marysville & Elkhorn*. Prepared for Inderveer Takhar and Robert Takhar. Dated March 18, 2026. Accessed April 6, 2026.

Overall, the proposed project would require minor extensions of infrastructure to serve the project site. As discussed above, existing service lines are located within the adjacent roadways and extension of these existing utility lines to serve the proposed project would occur as part of the project construction activities discussed throughout this document. Therefore, no significant new impacts would occur from the physical extension of utility lines and impacts would be less than significant.

- b. *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?*

Less than Significant. Based on standard planning factors (150 gpd per 1,000 sf for retail and 1,000 gpd per 1,000 sf for restaurant uses), the water demand for the retail and restaurant portion of the proposed project is estimated at approximately 2.9 million gallons per year (MGY). Including the on-site car wash, total annual demand is estimated to range between approximately 4.8 and 11.7 MGY, depending on car-wash throughput (e.g., 150–300 vehicles per day) and whether a reclamation system is used. The precise car-wash demand would be refined at the building permit stage once design details and operational assumptions are available.

Project operation would introduce new potable water demand associated with the convenience store, retail space, two quick service restaurants, the car wash, and landscaping. Final service assumptions would be based on standard land use demand factors and fixture-based estimates confirmed with the Rio Linda/Elverta Community Water District during improvement plan review. Based on these standard factors, the project's annual demand would be a relatively small addition compared to the District's supplies planned through 2045 and would fall within the growth considered in the 2020 Urban Water Management Plan. The site is currently undeveloped, so this would be a net increase from existing conditions. Car wash demand would be reduced through typical on-site recycling where feasible; if recycling is not implemented, gross use would be higher but still within the commercial demand range anticipated by the UWMP. The 2020 UWMP indicates supplies would meet projected demands in normal, single dry, and five consecutive dry years through 2045, and the project would not alter that conclusion with implementation of standard water-efficiency requirements.

The District has historically purchased water from the Sacramento Suburban Water District (SSWD) for emergency supply purposes only, via an intertie that can convey surface water and/or groundwater. The District has not purchased water from SSWD since 2014 and currently does not plan to rely on any imported water to meet demands in the service area.¹⁷⁴ Based on these projections, the District would have sufficient water supplies to serve the proposed project and reasonably foreseeable future development during normal, dry and multiple dry years. Therefore, impacts would be less than significant.

¹⁷⁴ Rio Linda Elverta Community Water District, 2022. *2020 Urban Water Management Plan for Rio Linda/Elverta Community Water District*. Available at: <https://rlecwdca.specialdistrict.org/files/a00c0bc7f/2020-RLECWD-UWMP-Final.pdf>. Accessed August 7, 2025.

- c. *Would the project result in a determination by the wastewater treatment provider, which 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?*

Less than Significant. The project site would be served by the Sacramento Area Sewer District (SacSewer). SacSewer provides wastewater collection and conveyance to the urbanized, unincorporated area of Sacramento County and has adequate wastewater treatment and disposal capacity to service the proposed project.

According to the SASD's 2020 System Capacity Plan (SCP), the focus of the SCP was to develop a comprehensive plan that addresses existing and buildout sewer capacity needs.¹⁷⁵ Types of land use and their respective densities were used to estimate unit wastewater flow rates for future development. The densities were expressed in units of equivalent single-family dwelling units (ESDs) per acre, where one ESD represents the wastewater generation equivalent of one single-family residence. The project site was mapped as being in an area with a projected buildout density of 6 ESD/acre. The proposed project would consist of a new gas station, convenience store, retail space, a car wash, and two quick service restaurants, which would increase demand for wastewater service over the existing condition. However, the site is planned for sewer service at an assumed intensity of 6 equivalent dwelling units per acre, and the proposed project would not exceed the wastewater demand anticipated under that planning assumption. Therefore, the project would not be expected to exceed available SASD/Regional San wastewater service capacity. Additionally, the SCP considered expansion areas to provide sewer services for future demand. SASD expansion areas were organized into expansion trunk sheds, and a trunk system expansion plan was developed for each shed. According to the SCP, the project site is already within the SASD service area and the project vicinity includes the UN Rio Linda West expansion area shed.¹⁷⁶ The UN Rio Linda West Trunk Shed is located south of the Sacramento County line, north of Elkhorn Boulevard, east of Steelhead Creek, and west of the Elverta Specific Plan area. This trunk shed is planned to be served by three trunk pump stations and two primary trunk conveyance systems that would connect to the Upper Northwest Interceptor, located in Elkhorn Boulevard. One trunk system would serve the western portion of the shed, and the other trunk is planned to serve the eastern portion.¹⁷⁷

As discussed above, the project site is within the SASD service area and within the projected buildout estimated under the SASD's 2020 System Capacity Plan. Additionally, the SASD has mapped out expansion trunk sheds to further support future capacity needs in the SCP study area, which includes the project vicinity. Therefore, the proposed project would not result in additional demand for wastewater services that would exceed SacSewer capacity and this impact would be less than significant.

¹⁷⁵ It should be noted that the Sacramento Area Sewer District (SASD) and the Sacramento Regional County Sanitation District (Regional San) merged into Sacramento Area Sewer District (SASD) in 2024. This report was conducted by the SASD before these two entities merged, therefore text from this report references the SASD.

¹⁷⁶ SASD, 2020. *2020 System Capacity Plan Update*. Available at: https://sacsewer-bucket.s3.us-west-1.amazonaws.com/wp-content/uploads/2020-SCP-Final-Report_Fee-Area-Names-Update_6-2-2025.pdf. Accessed August 7, 2025.

¹⁷⁷ SASD, 2020. *2020 SASD 202 System Capacity Plan Expansion Trunk Sheds, UN Rio Linda West Trunk Shed*. Available at: https://d3mu86l2sz7eca.cloudfront.net/wp-content/uploads/un_rio_linda_west.pdf. Accessed September 23, 2025.

Furthermore, minor extension of infrastructure would be necessary to serve the project site. Existing service lines are located within existing roadways and other developed areas, and the extension of lines would take place within areas already proposed for development as part of the proposed project. No significant new impacts would result from service line extension. Therefore, impacts would be less than significant.

- d. *Would the project 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?*

Less than Significant. As described above, the DWMR provides solid waste and recycling collection and disposal services to the project site. Waste generated by the proposed project would be collected and transported to local landfills by the DWMR and/or private haulers, and either recycled in accordance with County programs and requirements or landfilled at the Kiefer Landfill. The Kiefer Landfill currently has approximately 102.3 million cubic yards of remaining capacity and a cease operation date of 2080.¹⁷⁸ During operation, the increase in employees and visitors to the project site over existing conditions would result in an increase in solid waste generation. Operation of the proposed project would be required to comply with applicable federal, state, and local solid waste regulations. Waste generated from the proposed project would represent a fraction of the available capacity from this facility. Therefore, there would be no need to expand or create a new landfill, or solid waste facility, or impair the attainment of solid waste reduction goals. The impact would therefore be less than significant.

- e. *Would the project result in substantial adverse physical impacts associated with the provision of storm water drainage facilities?*

Less than Significant. The proposed project consists of the development of a new gas station, convenience store, retail space, a car wash, and two quick service restaurants, which includes approximately 197,861 square feet of net new impervious area. Proposed project design features would include areas of open space and landscaping, a public trunk main storm drain system along Marysville Boulevard and West Elkhorn Boulevard, associated inlets and closed-conduit storm drain infrastructure, and two bio-retention ponds to treat and release runoff water (refer to Section XI *Hydrology and Water Quality* discussion, above). Drainage improvements would include both on-site stormwater facilities and off-site conveyance improvements needed to intercept and reroute certain upstream flows around the project site, consistent with the accepted Level 3 Drainage Study. Existing utility and drainage connections are located within or adjacent to the surrounding roadway network, and the proposed extensions and drainage improvements would be constructed as part of project implementation. Based on the accepted drainage analysis, these improvements would not require downstream culvert upsizing and would not result in substantial adverse physical impacts associated with the provision of stormwater drainage facilities. Therefore, impacts would be less than significant.

¹⁷⁸ California Department of Resources Recycling and Recovery (CalRecycle), 2023. *Solid Waste Information System (SWIS) Facility/Site Activity Details: Sacramento County Landfill (Kiefer) (34-AA-001)*. Available at <https://www2.calrecycle.ca.gov/solidwaste/siteactivity/details/2070?siteid=2507>. Accessed August 7, 2025.

- f. *Would the project result in substantial adverse physical impacts associated with the provision of electric or natural gas services?*

Less than Significant. The proposed project consists of the development of a new gas station, convenience store, retail space, a car wash, and two quick service restaurants. Minor extension of infrastructure would be necessary to serve the project site. Existing service lines are located within existing roadways. The extension of existing utility lines to serve the proposed project would occur as part of the project construction activities discussed throughout this document. No significant new impacts would result from service line extensions. Therefore, impacts would be less than significant.

- g. *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

Less than Significant. The proposed project would comply with applicable federal, state, and local management, as well as regulations related to solid waste. Solid waste collection for the proposed project would be subject to Chapter 1, Subchapter 1, Parts 239 through 259 of Title 40 of the Code of Federal Regulations (CFR), which include regulations pertaining to solid waste. Additionally, the proposed project would comply with the CALGreen Code, the County's Construction and Demolition Debris program, and applicable policies for solid waste management within the Sacramento County General Plan Public Facilities Element. The proposed project would also comply with implementation programs for state and local solid waste reduction goals. As such, the impact of the proposed project on solid waste management regulations and reduction statuses would be less than significant.

ENVIRONMENTAL MITIGATION MEASURES

None recommended.

XXI. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts on the environment?	☐	☐	☒	☐
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

ENVIRONMENTAL SETTING

As discussed in Section XVI, *Public Services*, the project site is located within the Sacramento Metropolitan Fire District (SMFD) service area. The project site and project vicinity are not located within or near a State Responsibility Area (SRA) or a Fire Hazard Severity Zone (FHSZ) as mapped by CAL FIRE. The project area is within the Local Responsibility Area (LRA) for Sacramento County; however, there are no FHSZ in the LRA that encompass the project site.¹⁷⁹ It should be noted that there was recently a small fire on the corner of West Elkhorn Boulevard and Marysville Boulevard which left burn scars on the project site.

REGULATORY SETTING**STATE****PUBLIC RESOURCES CODE SECTION 4201-4204**

Sections 4201 through 4204 of the California Public Resources Code direct the CAL FIRE to map Fire Hazard Severity Zones (FHSZ) within SRA, based on relevant factors such as fuels, terrain, and weather. Mitigation strategies and building code requirements to reduce wildland fire risks to buildings within SRAs are based on these zone designations.

¹⁷⁹ California Department of Forestry and Fire Protection, 2025. *Local Responsibility Area Fire Hazard Severity Zones, Sacramento County – Unincorporated LRA*, March 10, 2025. Available at: <https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones>. Accessed July 21, 2025.

GOVERNMENT CODE SECTION 51175-51189

Sections 51175 through 51189 of the California Government Code directs CAL FIRE to recommend FHSZs within LRA. Local agencies are required to designate Very High Fire Hazard Severity Zones (VHFHSZs) in their jurisdiction within 120 days of receiving recommendations from CAL FIRE and may include additional areas not identified by CAL FIRE as VHFHSZs.

IMPACT DISCUSSION

- a. *Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*

Less than Significant. The project site is not located in a State or Local Responsibility Area designated as a moderate, high, or very high fire hazard severity zone. The closest VHFHSZ is located approximately 5 miles northeast of the project site in Placer County.

The County of Sacramento has an Emergency Operations Plan which aims to provide the planning basis for a coordinated response to natural and human-caused emergency disasters within or affecting the County.¹⁸⁰ Additionally, the County has an Evacuation Functional Annex, which provides strategies and procedures for the Operational Area's response to emergencies, and could evacuate people from an impacted area. Primary emergency evacuation routes in Sacramento County consist of major interstates, highways, and prime arterials.¹⁸¹ The project site is located approximately 2.9 miles north of the Interstate 80 and 3.9 miles east of State Route 99.

Construction activities would occur within the project site boundaries and along West Elkhorn Boulevard and Marysville Boulevard and would not require the complete closure of these roadways. Furthermore, impacts related to construction activities would be temporary and it is not anticipated that implementation of the proposed project would cause a similar level of temporary closures as could be the case during the construction of large projects. Therefore, construction and operation of the proposed project would not affect or substantially impair an adopted emergency response plan or emergency evacuation plan. In addition, the project would be required to comply with SMFD development requirements concerning emergency access and circulation. Therefore, impacts would be less than significant.

- b. *Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

Less than Significant. The project site is flat, undeveloped, and surrounded by primarily residential and agricultural uses as well as vacant land. The project site is not near any existing forests or vegetated slopes that would have the potential for wildfires. Additionally, there are no project characteristics, such as slope, prevailing winds, and other factors, that would exacerbate wildfire risks and thereby expose project occupants to pollutant

¹⁸⁰ Sacramento County Office of Emergency Services, 2022. *Emergency Operations Plan*. Available at: <https://sacoes.saccounty.gov/Documents/EOP%20Plan%20-%20Sacramento%20County%20-%20Final%204-22-2022.pdf>. Accessed July 24, 2025.

¹⁸¹ Sacramento County Office of Emergency Services, 2021. *Evacuation Functional Annex*. Available at: <https://sacoes.saccounty.gov/EmergencyManagement/Documents/Evac%20Annex%20All%20Combined%20-%20Aug%202021.pdf>. Accessed July 24, 2025.

concentrations from a wildfire or the uncontrolled spread of wildfire. While construction activities occurring during the dry season have the potential to create sparks that could ignite dry grasses and weeds in the project area or project site, this risk is similar to that found at other construction sites. Ongoing vegetation management practices would ensure that wildland fires would be unlikely to occur. Furthermore, the proposed project would adhere to building codes and any conditions included through review by SMFD. Therefore, the impact would be less than significant.

- c. *Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts on the environment?*

Less than Significant. The proposed project would not require the installation of new roads or power lines and would connect to existing water, wastewater, electrical, and other utility infrastructure to serve the project site. Given that the project site is not located in an area designated as a VHFHSZ, compliance with relevant emergency operation plans would ensure that proposed project infrastructure would not exacerbate fire risk or result in any temporary or ongoing impacts to the environment. Additionally, specifications for project infrastructure improvements would be subject to County requirements and review as well as SMFD plan review as required for issuance of a building permit to ensure compliance with the applicable fire and life safety regulations, codes, and ordinances. Therefore, the impact would be less than significant.

- d. *Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

Less than Significant. Post-fire impacts, such as slope instability and downstream flooding, are typically associated with steep wildland areas that burn and then erode or slide onto downslope areas. The project site is flat and is located in a transitional area between agricultural-residential and single-family residential uses, which are typically away from natural areas susceptible to downslope or downstream flooding, landslides, or post-fire slope collapse and drainage changes. Therefore, the proposed project would not expose people or structures to significant risks and the impact would be less than significant.

ENVIRONMENTAL MITIGATION MEASURES

None recommended.

XXII. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☐	☒	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

IMPACT DISCUSSION

- a. *Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*

Less than Significant with Mitigation. As described in Section V, Biological Resources, the project site is highly disturbed and does not support special-status plant or wildlife species or sensitive natural communities. However, the site provides potential nesting habitat for common and urban-adapted birds and burrowing owls protected under the Migratory Bird Treaty Act (MBTA), California Fish and Game Code, and the California Endangered Species Act. Construction activities during the nesting season could result in the disturbance of active nests, which would be a potentially significant impact under CEQA.

Implementation of Mitigation Measure BIO-1 would reduce this impact to a less-than-significant level by requiring pre-construction nesting bird surveys and establishment of no-disturbance buffers around any active nests until fledging is complete. The project would also result in permanent impacts to approximately 0.251 acre of seasonal wetlands and a swale that may be jurisdictional under state and federal regulations. Implementation of

Mitigation Measure BIO-2 would require wetland compensation and acquisition of all applicable permits from the U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service, Central Valley Regional Water Quality Control Board, and California Department of Fish and Wildlife, reducing impacts to a less-than-significant level.

No native, landmark, or heritage trees were documented on-site; therefore, the project would not remove or require mitigation for protected trees. Implementation of Mitigation Measures CR-1 (Unanticipated Discovery of Cultural Resources), CR-2 (Unanticipated Discovery of Human Remains), TCR-1 (Compensated Construction Monitoring by Official Tribal Monitor), and GEO-1 (Inadvertent Discovery of Paleontological Resources) would ensure that previously unidentified cultural resources, tribal cultural resources, human remains, and paleontological resources, if encountered during construction, are appropriately identified, evaluated, and treated. Therefore, the project would not substantially degrade the quality of the environment or eliminate important examples of California history or prehistory.

- b. *Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)*

Less than Significant. Consideration of the proposed project-related impacts along with, or in combination with other project-related impacts are defined as cumulative impacts. As discussed in various sections, the proposed project would have potential impacts related to construction and operation of the project. The proposed project would result in typical construction-related impacts such as temporary air pollutant emissions, noise, and traffic increases. These are short-term in nature and therefore, considered to be temporary impacts. The proposed project would result in operational impacts related to increased vehicle trips, utility use, and stormwater generation. As described in each technical section of this IS/MND, these impacts would either be less than significant or reduced to less than significant with mitigation. Other projects in the vicinity of the proposed project would be also subject to the County's General Plan policies, codes, and regional requirements similar to that applicable to the proposed project. When considered with other current and planned development in the Rio Linda/Elverta community area, the proposed project's impacts are not considered cumulatively considerable. Therefore, cumulative impacts would be less than significant.

- c. *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

Less than Significant. The project would not result in significant impacts to air quality, noise, transportation, hazards, or public services that would cause substantial adverse effects on human beings. Construction and operational impacts would be minimized through standard regulatory compliance, mitigation measures where required, and adherence to applicable County and state standards. Therefore, the proposed project would not cause substantial adverse effects on human beings, directly or indirectly.

ENVIRONMENTAL MITIGATION MEASURES

Mitigation Measures ensure that identified significant impacts of the project are reduced to a level of less than significant. Pursuant to Section 15074.1(b) of the CEQA Guidelines, each of these measures must be adopted exactly as written unless both of the following occur:

(1) A public hearing is held on the proposed changes; (2) The hearing body adopts a written finding that the new measure is equivalent or more effective in mitigating or avoiding potential significant effects and that it in itself will not cause any potentially significant effect on the environment.

MITIGATION MEASURE COMPLIANCE

Comply with the Mitigation Monitoring and Reporting Program (MMRP) for the West Elkhorn Gas Station, C-Store, & Pair of Fast Food Restaurants as follows:

1. The proponent shall comply with the MMRP for this project, including the payment of a fee to cover Planning and Environmental Review staff costs incurred during implementation of the MMRP. The MMRP fee for this project is **\$8,400.00**. This fee includes administrative costs of **\$1, 167.00**.
2. Until the MMRP has been recorded and the administrative portion of the MMRP fee has been paid, no final parcel map or final subdivision map for the subject property shall be approved. Until the balance of the MMRP fee has been paid, no encroachment, grading, building, sewer connection, water connection or occupancy permit from Sacramento County shall be approved.

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