



# ADDENDUM TO THE SACRAMENTO COUNTY GENERAL PLAN UPDATE FINAL ENVIRONMENTAL IMPACT REPORT FOR THE SACRAMENTO COUNTY CLIMATE ACTION PLAN

Control Number 2002-GPB-0105

State Clearinghouse Number 2007082086



## PREPARED FOR:

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for the  
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September 2021

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## BACKGROUND AND ACTION TRIGGERING THE ADDENDUM

This document serves as an addendum to the Sacramento County General Plan Update Final Environmental Impact Report (GP EIR). The GP EIR is a program EIR that considers the environmental effects of implementing the General Plan through the 2030 planning horizon. The GP EIR includes two mitigation measures that require the County to develop a climate action plan (CAP). Mitigation Measure CC-1 states: “The following policy shall be added to the General Plan: It is the goal of the County to reduce greenhouse gas emissions to 1990 levels by the year 2020. This shall be achieved through a mix of State and local action.” Mitigation Measure CC-2 further specifies implementation measures including when the County must adopt a CAP, what elements the CAP must contain, and how often the County shall complete an inventory of GHG emissions.

The GP EIR includes a preliminary analysis of the potential effects of implementing Mitigation Measures CC-1 and CC-2 in Chapter 12, “Climate Change.” In concert with State and federal activities, this mitigation is intended to offset the cumulatively significant climate change impact associated with implementation of the General Plan. The evaluation notes that although “the Climate Action Plan is intended to benefit the County in a variety of ways, there are potential negative physical consequences associated with implementation” (p. 12-33) and provides several specific examples. This addendum supplements the GP EIR analysis and evaluates the specific GHG reduction and climate change adaptation measures and strategies in the CAP for potential to change the conclusions of the GP EIR. The analysis in this addendum remains programmatic; it does not specifically analyze individual projects or actions resulting from implementation of the CAP because the details of such projects and actions are not available (e.g., specific location of infrastructure).

As the lead agency under the California Environmental Quality Act (CEQA), Sacramento County has determined that the adoption and implementation of the proposed CAP warrants the preparation of an addendum in accordance with Section 15164 of the State CEQA Guidelines.

## CALIFORNIA ENVIRONMENTAL QUALITY ACT GUIDELINES REGARDING AN ADDENDUM TO AN ENVIRONMENTAL IMPACT REPORT

Altered conditions, changes, or additions to the description of a project that occur after certification of an EIR may require additional analysis under CEQA. The legal principles that guide decisions regarding whether additional environmental documentation is required are provided in the State CEQA Guidelines, which establish three mechanisms to address these changes: a subsequent environmental impact report (SEIR), a Supplement to an EIR, and an Addendum to an EIR.

Section 15162 of the State CEQA Guidelines describes the conditions under which a SEIR would be prepared. In summary, when an EIR has been certified for a project, no SEIR is required unless the lead agency determines, on the basis of substantial evidence in light of the whole record, one or more of the following:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:
  - (A) The project will have one or more significant effects not discussed in the previous EIR;
  - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
  - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternatives; or
  - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Section 15163 of the State CEQA Guidelines states that a lead agency may choose to prepare a supplement to an EIR rather than a Subsequent EIR if:

- (1) any of the conditions described above for Section 15162 would require the preparation of a SEIR; and
- (2) only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.

An addendum is appropriate where a previously certified EIR has been prepared and some changes or revisions to the project are proposed, or the circumstances surrounding the project have changed, but none of the changes or revisions would result in significant new or substantially more severe environmental impacts, consistent with CEQA Section 21166 and State CEQA Guidelines Sections 15162, 15163, 15164, 15168, and 15183.

This addendum includes an environmental checklist that contains the substantial evidence supporting that the CAP, as proposed, would not result in any new or substantially more severe environmental impacts from those identified in the GP EIR. This addendum and checklist serve as the appropriate CEQA compliance document and have been prepared consistent with the requirements of Section 15162 of the State CEQA Guidelines. To ensure that all environmental topical areas are appropriately evaluated, the environmental checklist was prepared to mirror the standard organization of the sample environmental checklist presented in Appendix G of the State CEQA Guidelines. For each checklist topic, the analysis evaluates whether any “changed condition” (i.e., changed circumstances, project changes, issues that are peculiar to the project, or new information of substantial importance) that may result in a different or new environmental impact significance conclusion from the EIR would occur. The column titles of the checklist have been modified from the Appendix G presentation to help answer the questions to be addressed pursuant to CEQA Section 21166 and State CEQA Guidelines Section 15162, 15163, 15164, 15168, and 15183. Through this detailed analysis, the County has demonstrated through substantial evidence that implementation of the proposed CAP would not result in new or substantially more severe impacts than disclosed in the GP EIR.

## EVALUATION OF CLIMATE ACTION PLAN STRATEGY OPTIONS

In response to public comments received on the CAP and the CAP preparation process, the County has compiled, and evaluated in good faith, four CAP strategy options. Comments received during the CAP process suggested that the County should consider new, additional, alternate, or enhanced GHG reduction measures not currently included in the CAP. Some comments expressed preference for certain GHG reduction measures over others or stated that the CAP should include more measures than proposed. The County has carefully considered all comments and suggestions for new or alternate GHG reduction measures. The CAP (including the currently proposed suite of GHG reduction measures) that has been proposed and evaluated in this addendum and environmental checklist, meets the GHG reduction targets set by Mitigation Measures CC-1 and CC-2 in the GP EIR. No additional measures are needed to meet this target. Further, as presented in the environmental checklist, the proposed CAP would not result in any new or substantially more severe environmental impacts from those evaluated in the GP EIR. Therefore, there are no requirements for the County to consider or evaluate other GHG reduction measures. Nonetheless, the County has prepared four strategy options that incorporate the recommended GHG reduction measures received in public comments. Section 4 of the environmental checklist presents an evaluation of the comparative environmental implications of the commenter-proposed measures to provide additional information for decisionmakers and the public. This analysis is presented for informational purposes only.

## SUMMARY OF FINDINGS

The environmental checklist for this Addendum provides analysis and discussion of potential environmental impacts of the proposed CAP, based on the checklist questions from Appendix G of the State CEQA Guidelines. The analysis demonstrates that implementation of the proposed CAP would not result in new significant effects or a substantial increase in the severity of previously identified significant effects. Further, no new information of substantial importance has been identified that suggests the potential for the CAP to result in significant or substantially more severe effects not discussed in the previous EIR.

# ENVIRONMENTAL CHECKLIST

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## LIST OF ABBREVIATIONS

°C	degrees Celsius
°F	degrees Fahrenheit
2017 Scoping Plan	California's 2017 Climate Change Scoping Plan
AB	Assembly Bill
ALUC	Airport Land Use Commission
ALUCP	airport land use compatibility plans
BAU	business-as-usual
BMP	best management practice
CAL FIRE	California Department of Forestry and Fire Protection
Caltrans	California Department of Transportation
CAP	climate action plan
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulation
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CLUP	comprehensive land use plan
CO	carbon monoxide
DWR	California Department of Water Resources
EIR	environmental impact report
EPA	U.S. Environmental Protection Agency
EV	electric vehicle
FR	Federal Register
General Plan	<i>Sacramento County General Plan of 2005-2030</i>
GHG	greenhouse gas



GP EIR	<i>Sacramento County General Plan Update Final Environmental Impact Report</i>
GSA	groundwater sustainability agency
GSP	groundwater sustainability plan
LRA	Local Responsibility Area
LOS	level of service
MPO	metropolitan planning organization
MTCO <sub>2e</sub>	metric tons of carbon dioxide equivalent
MTP/SCS	Metropolitan Transportation Plan/Sustainable Communities Strategy
NAAQS	national ambient air quality standards
NO <sub>x</sub>	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
OPR	California Office of Planning and Research
PM <sub>10</sub>	respirable particulate matter with diameters that are generally 10 micrometers and smaller
PM <sub>2.5</sub>	respirable fine particulate matter with diameters that are generally 2.5 micrometers and smaller
PRC	Public Resources Code
ROG	reactive organic gasses
SacDOT	Sacramento County Department of Transportation
SACOG	Sacramento Area Council of Governments
SacRT	Sacramento Regional Transit District
SAFE Rule	Safer Affordable Fuel-Efficient Vehicles Rule
SB	Senate Bill
SGMA	Sustainable Groundwater Management Act
SIP	2008 Sacramento Regional 8-hour Ozone Attainment and Reasonable Further Progress Plan
SMAQMD	Sacramento Metropolitan Air Quality Management District

SMAQMD Guide	Guide to Air Quality Assessment in Sacramento County
SMUD	Sacramento Municipal Utility District
SRA	State responsibility area
SRWTP	Sacramento Regional Wastewater Treatment Plant
SSHCP	South Sacramento Habitat Conservation Plan
TAC	toxic air contaminant
TCP	traffic control plan
UBC	Uniform Building Code
USB	Urban Services Boundary
UPA	Urban Policy Area
VMT	vehicle miles traveled
ZEV	zero emission vehicle

# 1 INTRODUCTION

## 1.1 PROJECT HISTORY

In the last several decades, there has been increased awareness that global warming, a rise in the near-surface temperature of the Earth predicted to occur as a result of greenhouse gasses (GHGs) emitted by human activity, poses societal challenges including decreased water supply, increased flooding risks, stresses to the agricultural industry, increased fire risks, degraded air and water quality, impaired terrestrial and aquatic habitat, and negative public health impacts (Sacramento County 2011a). In September 2006, Governor Schwarzenegger signed Assembly Bill (AB) 32, the Global Warming Solutions Act of 2006. This landmark bill required California to reduce GHG emissions to 1990 levels by the year 2020.

Land use and planning decisions within unincorporated Sacramento County are guided by the *Sacramento County General Plan of 2005-2030* (hereafter General Plan). General plans are updated periodically to encompass current standards, community identity, changes in priorities, and to update a jurisdiction's blueprint for growth. The last update to the General Plan began in 2002 and concluded in November 2011. The General Plan includes a goal to help achieve the state's target per AB 32. Sacramento County also recognized the environmental and administrative benefits of a "big picture" approach to climate change for the General Plan, rather than addressing climate change on a project-by-project basis.

The California Environmental Quality Act (CEQA) requires consideration of a project's potential environmental impacts and identification of feasible methods to mitigate those impacts before approving actions that could harm the environment (for example, before approving a development project or adopting a county land use plan). When impacts could be significant, an environmental impact report (EIR) is prepared and is circulated to obtain input from the public and other agencies. The 2010 *Sacramento County General Plan Update Final Environmental Impact Report* (GP EIR) includes two mitigation measures that require the County to develop a climate action plan (CAP). Mitigation Measure CC-1 states: "*The following policy shall be added to the General Plan: It is the goal of the County to reduce greenhouse gas emissions to 1990 levels by the year 2020. This shall be achieved through a mix of State and local action.*" Mitigation Measure CC-2 specifies implementation measures, including when the County must adopt a CAP, what elements the CAP must contain, and how often the County shall complete an inventory of GHG emissions.

The County has implemented this mitigation in several phases. On November 9, 2011, the County Board of Supervisors adopted the *Climate Action Plan – Strategy and Framework Document*, which presented a framework for reducing GHG emissions and an overall strategy to address climate change. Additionally, it provided direction for developing the second phase of the CAP. On September 11, 2012, the Board of Supervisors adopted the *Climate Action Plan – Government Operations*, which quantified GHG emissions from the County's operations (e.g., County-owned facilities, vehicles, and equipment) and identified measures to reduce these emissions. The County began work on a comprehensive CAP in 2016, which would supersede the 2011 and 2012 planning and achieve communitywide GHG reductions and resiliency. This CAP updates the unincorporated County's GHG inventory and forecasts, identifies the required GHG reduction targets, and proposes measures to achieve the required GHG reductions for the entire County. Additionally, to prepare for climate change impacts

(e.g., impacts related to precipitation, flooding, heat waves, wildfires, air quality, water supply, water quality, natural ecosystems, and agriculture), the CAP includes preparation of a vulnerability assessment and an adaptation strategy.

## 1.2 ADDENDUM ANALYSIS

The GP EIR is a program EIR that considers the environmental effects of implementing the General Plan through the 2030 planning horizon. Consistent with Public Resources Code (PRC) Section 21083.3(b) and State CEQA Guidelines Sections 15168 and 15183, the GP EIR can be used as the CEQA document for subsequent projects (public and private) that are consistent with the General Plan. Projects are evaluated to determine whether the actions proposed fall within the scope of the General Plan, whether project impacts are addressed in the certified GP EIR, and whether the project incorporates all applicable performance standards and mitigation measures identified therein. Should subsequent projects not be consistent with the approved General Plan, or if there are specific significant effects that are peculiar to the project and cannot be addressed by uniformly applied policies or standards, additional environmental review through the subsequent review provisions of CEQA for changes to previously reviewed and approved projects may be warranted. If an impact is not peculiar to the project, has been addressed as a significant effect in the GP EIR, or can be substantially mitigated by the imposition of uniformly applied policies or standards, then an additional EIR need not be prepared for the project solely based on that impact.

The GP EIR includes a preliminary analysis of the potential effects of implementing Mitigation Measures CC-1 and CC-2 in Chapter 12, "Climate Change." In concert with State and federal activities, this mitigation is intended to offset the cumulatively significant climate change impact associated with implementation of the General Plan. The evaluation notes that although "the Climate Action Plan is intended to benefit the County in a variety of ways, there are potential negative physical consequences associated with implementation" (p. 12-33). The analysis of the proposed mitigation notes, for example, that the construction of infrastructure necessary to generate renewable energy could "affect aesthetics and may affect open space areas (and any resources within them)" (p. 12-34). In addition, potential effects disclosed in the GP EIR include those associated with constructing new waste and water facilities (such as the regional composting facility, pipelines, and other infrastructure) that could result in impacts to air quality, biological resources, cultural and paleontological resources, hazardous materials, and water quality. As a programmatic analysis, the GP EIR appropriately notes that the precise, project-level effects of such infrastructure projects would be evaluated at the time of implementation.

This Addendum supplements the GP EIR analysis and evaluates the specific GHG reduction and climate change adaptation measures and strategies in the CAP for potential to change the conclusions of the GP EIR. The analysis in this Addendum remains programmatic; it does not specifically analyze individual projects or actions resulting from implementation of the CAP because the details of such projects and actions are not available (e.g., specific location of infrastructure). Specific GHG Reduction Measures or strategies would require subsequent implementing action by the County. The County would implement specific activities proposed under the CAP (i.e., "later activities"), determining whether they are consistent with the activities identified in the CAP, and determining whether sufficient evaluation of the potential environmental impacts associated with these later activities has been provided in the GP EIR and this Addendum. These later activities would be examined to determine whether an additional environmental document must be prepared. During this examination, if the County

finds pursuant to State CEQA Guidelines Section 15162 that no new significant effects are identified or no new mitigation measures would be required on a subsequent project, the activity can be approved as being within the scope of the project covered by the GP EIR and this Addendum. In this situation, the County must incorporate all project requirements and applicable mitigation measures from the GP EIR into the later activity to address significant or potentially significant effects on the environment. If a subsequent project or later activity would have significant effects that were not examined in the GP EIR and this Addendum, the County would prepare an initial study to determine the appropriate environmental document. If an additional environmental document is needed, whether it is a mitigated negative declaration or supplement to the GP EIR, the GP EIR and this Addendum can be used to simplify the task of preparing the follow-up environmental document by allowing the County to focus on the issues that were not previously addressed in the GP EIR and this Addendum, as indicated in State CEQA Guidelines Section 15168(d).

### 1.2.1 Tiering and Streamlining the Analysis of Greenhouse Gas Emissions for Future Projects

The CAP meets the requirements for a GHG reduction plan set forth in Section 15183.5(b)(1) of the State CEQA Guidelines. Therefore, if adopted, it could be used to streamline the analysis of GHG emissions for future projects (known as a “qualified CAP”). As established in Section 15183.5 of the State CEQA Guidelines, a plan to reduce GHG emissions (i.e., the proposed CAP) may be used as the basis of future project-level analyses of GHG emissions impacts. Where subsequent projects use CAP compliance as the basis for the analysis of potential impacts due to GHG emissions, they would tier from and/or incorporate by reference the programmatic GHG analysis in the GP EIR and this Addendum. An environmental document that relies on the CAP for analysis of GHG emissions impacts would be required to identify the requirements in the CAP that apply to the project and incorporate those requirements as mitigation measures, if not otherwise binding and enforceable. In turn, “a lead agency may determine that a project’s incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously adopted plan” (State CEQA Guidelines Section 15183.5[b]). An EIR may still be required for future projects, notwithstanding the project’s compliance with the CAP, “[i]f there is substantial evidence that the effects of a particular project may be cumulatively considerable” (State CEQA Guidelines Section 15183.5[b][2]). Further, streamlining the GHG analysis based on CAP consistency does not affect the obligation to address potential effects on other resource areas during project-level environmental review.

### 1.2.2 Document Organization

This Addendum is organized as follows:

**Section 1: Introduction.** This section introduces the environmental review process. It describes the purpose and organization of the analysis and presents a summary of findings.

**Section 2: Project Description.** This section provides a brief description of the proposed CAP.

**Section 3: Environmental Checklist for Supplemental Environmental Review.** This section presents an analysis of a range of environmental issues to determine whether the environmental impacts of the CAP meet any of the following four conditions:

- (1) Are peculiar to the project or the area in which the project would be located,
- (2) Were not analyzed as significant effects in the GP EIR,
- (3) Are potentially significant off-site impacts and cumulative impacts which were not addressed in the GP EIR, or
- (4) Are previously identified significant effects which are determined to have a more severe adverse impact than discussed in the GP EIR based on substantial new information that was not known at the time the GP EIR was certified.

**Section 4: Climate Action Plan Strategy Options.** This section includes a brief comparative analysis of the environmental implications associated with the Strategy Options presented in Appendix F to the proposed CAP.

**Section 5: References.** This section lists the references used in preparation of this Addendum.

### 1.2.3 Summary of Findings

The Environmental Checklist for this Addendum provides analysis and discussion of potential environmental impacts of the proposed CAP, based on the checklist questions from Appendix G of the State CEQA Guidelines. The analysis demonstrates that implementation of the proposed CAP would not result in new significant effects or a substantial increase in the severity of previously identified significant effects. Further, no new information of substantial importance has been identified that suggests the potential for the CAP to result in significant or substantially more severe effects not discussed in the previous EIR.

## 2 PROJECT DESCRIPTION

### 2.1 PROJECT OVERVIEW

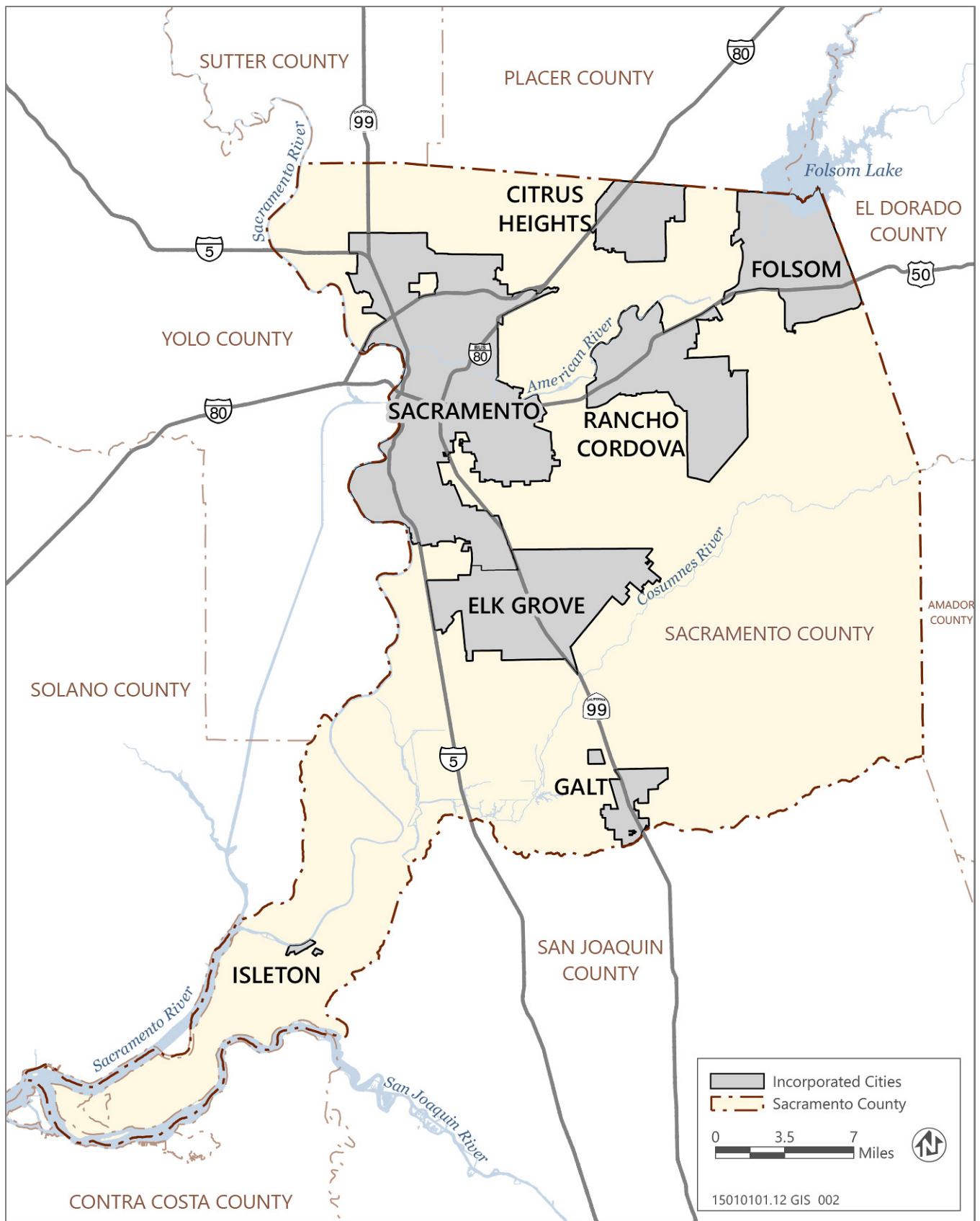
Sacramento County's proposed CAP is a comprehensive plan for the reduction of GHG emissions through a series of actions and strategies that would be undertaken by the County. The CAP is a multi-objective plan that balances environmental, economic, and community interests; implements the County's General Plan; and aligns with multiple County initiatives. It identifies strategies and measures to meet the State's 2030 GHG reductions targets. The CAP also includes an adaptation plan that recommends actions to reduce the community's vulnerability to the anticipated impacts of climate change. The proposed CAP does not include any development proposals and would not directly result in physical environmental effects because of the construction or operation of facilities.

The CAP has been developed in response to mitigation measures contained in the County's GP EIR and the County's adoption of a Climate Emergency Resolution in December 2020. The strategies and measures contained in the CAP complement a wide range of policies, plans, and programs that have been adopted by the County, State, and regional agencies. The CAP is organized into a main CAP document that provides general information about the County's approach and actionable strategies followed by appendices containing more information on the analyses used to inform the strategies and measures.

### 2.2 PROJECT LOCATION

Sacramento County is located in the northern portion of California's Central Valley. As shown in Figure 2-1, it extends from the delta formed at the confluence of the Sacramento and San Joaquin Rivers in the southwest to Folsom Lake and the Sierra Nevada foothills in the northeast. It is bordered by eight counties: El Dorado, Amador, San Joaquin, Contra Costa, Solano, Yolo, Sutter, and Placer. Interstates 5 and 80, State Route 99, and U.S. Highway 50 provide regional access.

The CAP applies to unincorporated Sacramento County, which encompasses approximately 496,083 acres or 775 square miles. The incorporated areas within the County (including the cities of Sacramento, Citrus Heights, Folsom, Rancho Cordova, Galt, Elk Grove, and Isleton) would not be subject to the proposed CAP.



Source: Adapted by Ascent Environmental in 2021

**Figure 2-1 Regional Location**



## 2.3 DESCRIPTION OF PROPOSED PROJECT

Reducing GHG emissions in California has been the focus of the State government for approximately two decades. GHG emission targets established by the State legislature include reducing statewide GHG emissions to 1990 levels by 2020 (AB 32 of 2006) and to 40 percent below 1990 levels by 2030 (Senate Bill [SB] 32 of 2016). The CAP is intended to support the County with staying on track to a locally-adjusted target for 2030 GHG reduction that is aligned with the State's legislated statewide targets in AB 32 and SB 32. In addition, Executive Order S-3-05 calls for reducing statewide GHG emissions to 80 percent below 1990 levels by 2050. Executive Order B-55-18 calls for California to achieve carbon neutrality by 2045 and to achieve and maintain net negative GHG emissions thereafter. These targets are in line with the scientifically established levels needed in the United States to limit the rise in global temperature to no more than 2 degrees Celsius (°C), the warming threshold at which major climate disruptions, such as super droughts and rising sea levels, are projected. The targets also support efforts to limit the temperature increase even further to 1.5 °C (United Nations 2015:3).

### 2.3.1 Climate Action Plan

The CAP includes strategies for community GHG emission reduction, government operations GHG emission reduction, and adaptation. Each strategy is comprised of a series of supporting measures (i.e., a program, policy, or project that the County will implement). The CAP also includes information about implementing and monitoring the success of the strategies.

## BASELINE AND FORECAST GREENHOUSE GAS EMISSIONS

### Inventory

Preparing a GHG emissions inventory is an important first step in the climate action planning process. An emissions inventory provides a snapshot of the major sources of emissions in a single year, while also providing a baseline from which emission trends are projected. The CAP uses an emissions inventory from 2015 as the baseline.

### Forecasts

GHG emissions forecasts provide an estimate of future GHG levels based on a continuation of current trends in activity, population and job growth, and relevant regulatory actions by federal, State, and regional agencies (i.e., "legislative" actions) that have been adopted. Emissions forecasts provide insight into the scale of local reductions needed to achieve GHG emission reduction targets.

Using population, employment, and housing data, the results from the 2015 baseline year inventory were forecast to 2030 for consistency with the target year for the CAP, which is aligned with the County's General Plan and California's 2017 Climate Change Scoping Plan (2017 Scoping Plan). Growth projections were based on the Sacramento Area Council of Governments' (SACOG's) 2016 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS). These aggregated growth factors were used to forecast emissions comprehensively through 2030 for most sectors in the inventory and include projected growth

throughout the unincorporated County. This methodology does not constrain the projections in the CAP to reflect specific projects or areas of potential growth.

The CAP uses two forecast scenarios, referred to as the “business-as-usual” (BAU) and legislative-adjusted BAU scenarios. Both the BAU and legislative-adjusted BAU scenarios assume that population, employment, and transportation activity will grow over time, using the SACOG demographic data. The BAU forecast scenario accounts for changes in emissions associated with future growth in the County, but without the adoption of a CAP or future reduction action by federal, State, or regional agencies. The legislative-adjusted BAU forecast scenario accounts for future changes in emissions associated with growth in the County, along with legislative reductions from federal, State, and regional regulations, policies, or other mandated actions.

Refer to CAP Appendix E for additional description of the GHG emissions inventories, target setting, and assumptions used for GHG reduction measure quantification for the CAP.

### Emissions Gap

The inventory and forecasts are used to develop reduction targets consistent with State mandates. The emissions gap, if any, between forecasted emissions and reduction targets serves as the foundation to determine the strategies and measures needed to reduce GHG emissions to meet the 2030 target.

## GREENHOUSE GAS REDUCTION TARGETS FOR 2030 AND BEYOND

The CAP is intended to serve as the County’s qualified plan for the reduction of GHG emissions in accordance with Section 15183.5 of the CEQA Guidelines (refer to Section 1.2.1, above). This requires that the plan establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable. The level selected for this CAP is alignment with the 2017 Scoping Plan. Based on the forecast GHG emissions and population projections, the County is expected to have an emissions rate of 4.8 metric tons of carbon dioxide equivalents (MTCO<sub>2e</sub>) per capita in 2030. This is below the rate of 6.0 MTCO<sub>2e</sub> per capita by 2030 recommended to local governments by the California Air Resources Board (CARB) in the 2017 Scoping Plan.

The GHG reduction measures contained in the CAP would provide additional reductions beyond the 4.8 MTCO<sub>2e</sub> per capita forecast, further outpacing the 6.0 MTCO<sub>2e</sub> per capita recommended by CARB. The associated quantified GHG reductions and carbon sequestration benefits of these measures would be essential for putting the County on a path to achieving the objectives of the community 2030 carbon neutrality goal established under the Climate Emergency Resolution passed in December 2020 by the Board of Supervisors.

## GREENHOUSE GAS REDUCTION STRATEGY

The CAP strategy includes both quantified and non-quantified measures. The following sustainability planning strategies were considered when developing the measures.

- **Clean Energy:** Focus on providing clean and affordable sources of energy for the County by increasing the use of renewables.

- **Low and Zero Emissions Vehicles and Equipment:** Support electrification and alternative fuels in on-and off-road vehicles and equipment, as well as fuel efficiency measures that would reduce the amount of gasoline and diesel fuel consumed.
- **Green Buildings:** Reduce commercial and residential building energy and water consumption and incorporate design features that reduce or eliminate the need for fossil fuels.
- **Natural and Working Lands:** Sequester carbon dioxide from the atmosphere by focusing on habitat preservation, increasing urban forest and connected open space, and carbon farming.
- **Reduced Driving and Alternative Transportation Modes:** Reduce emissions-generating activities by promoting telework, public transit and alternative modes of transportation such as biking and walking, carpooling, and transit-oriented development.

## CLIMATE CHANGE ADAPTATION STRATEGY

This section describes the adaptation framework and presents measures that the County would take to address climate vulnerabilities and increase countywide resiliency. The adaptation measures set forth a strategy for the County to prepare for increased: temperatures and extreme heat days, risk of wildfire, drought, flooding, and sea level rise. Many climate adaptation measures may also reduce GHG emissions, improve public health, and achieve other co-benefits that further the County’s sustainability and environmental justice goals and improve community resilience.

## CONSISTENCY REVIEW CHECKLIST

The County has prepared a CAP Consistency Review Checklist that provides a process and evidence by which subsequent development projects would demonstrate how they would be consistent with the CAP (i.e., they would not hinder attainment of the 2030 reduction targets). An environmental document that relies on the CAP for analysis of GHG emissions impacts would be required to identify the requirements in the CAP that apply to the project and incorporate those requirements as mitigation measures, if not otherwise binding and enforceable. Projects that are not consistent with the CAP would be subject to separate technical analysis and project mitigation.

## 2.4 POTENTIAL PERMITS AND APPROVALS REQUIRED

The County is the CEQA lead agency responsible for adoption and implementation of the proposed CAP. As the lead agency, the County is responsible for considering the adequacy of the supplemental environmental review before determining if the overall project should be adopted.

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# 3 ENVIRONMENTAL CHECKLIST FOR SUPPLEMENTAL ENVIRONMENTAL REVIEW

## APPROACH TO ANALYSIS

The GP EIR is a program EIR consistent with the requirements of CEQA. The analysis considers the environmental impacts of policy implementation and development buildout that could occur under the General Plan. As discussed in Section 1, the project is consistent with General Plan policies and is considered an implementation action of the General Plan. CEQA Guidelines Section 15183 dictates that, in circumstances such as these, a lead agency “shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site.” Section 15183 further indicates that an initial study or other analyses should be prepared by a lead agency to determine the scope of environmental review in light of this prohibition. The purpose of this process is to streamline the review of covered projects and reduce the need for the preparation of repetitive environmental studies.

Under Section 15183 of the State CEQA Guidelines, a checklist can be used to determine whether the following types of impacts may merit additional environmental analysis:

- Significant impacts that are peculiar to the project or area in which the project would be located;
- Significant impacts that were not analyzed in a prior EIR on the zoning action, General Plan or community plan with which the project is consistent;
- Potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the General Plan, community plan or zoning action; or
- Previously identified significant effects which, as a result of substantial new information, were not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.

Unless an environmental effect satisfies one of these criteria, the lead agency can rely upon its previously certified EIR (State CEQA Guidelines Section 15183[c]).

## CHECKLIST FORMAT

Each of the following resource-specific subsections begins with a checklist. The purpose of this checklist is to evaluate the categories listed in Section 15183 of the State CEQA Guidelines to determine whether, in light of the GP EIR, there are any significant environmental effects requiring additional environmental analysis. The row titles of the checklist include the full range of environmental topics, as presented in Appendix G of the State CEQA Guidelines. The column titles of the checklist have been modified from the Appendix G presentation to help answer the questions to be addressed pursuant to PRC Section 21083.3(b) and State CEQA Guidelines Section 15183. A “no” answer does not necessarily mean that there are no potential impacts relative to the environmental category, but that there is no change in the condition or status of the impact because it was analyzed and addressed with mitigation

measures in the GP EIR. For instance, the environmental categories might be answered with a “no” in the checklist because the impacts associated with the project were adequately addressed in the GP EIR, and the environmental impact significance conclusions of the GP EIR remain applicable. The purpose of each column of the checklist is described below.

## Where Impact was Analyzed?

This column provides a cross-reference to the pages of the 2010 GP EIR where information and analysis may be found relative to the environmental issue listed under each topic.

## Any Peculiar Impact?

Pursuant to State CEQA Guidelines Sections 15183(b)(1) and 15183(f), this column indicates whether the project could result in a peculiar impact, including a physical change that belongs exclusively or especially to the project or that is a distinctive characteristic of the project, or the project site and that peculiar impact is not substantially mitigated by the imposition of uniformly applied development policies or standards.

## Any Impact Not Analyzed as Significant in GP EIR?

Pursuant to State CEQA Guidelines Section 15183(b)(2), this column indicates whether the project would result in a significant effect that was not analyzed as significant in the 2010 GP EIR. A new EIR is not required if such a project impact can be substantially mitigated by the imposition of uniformly applied development policies or standards.

## Any Significant Off-Site or Cumulative Impact Not Analyzed?

Pursuant to State CEQA Guidelines Section 15183(b)(3), this column indicates whether the project would result in a significant off-site or cumulative impact that was not discussed in the 2010 GP EIR. A new EIR is not required if such an off-site or cumulative impact can be substantially mitigated by the imposition of uniformly applied development policies or standards.

## Any Adverse Impact More Severe Based on Substantial New Information?

Pursuant to State CEQA Guidelines Section 15183(b)(4), this column indicates whether there is substantial new information that was not known at the time the 2010 GP EIR was certified, indicating that there would be a more severe adverse impact than discussed in the 2010 GP EIR. A new EIR is not required if such an impact can be substantially mitigated by the imposition of uniformly applied development policies or standards.

## Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/Resolve Impacts?

This column indicates whether the 2010 GP EIR and adopted CEQA Findings provide mitigation measures to address effects in the related impact category. In some cases, the mitigation measures have already been implemented. This column also indicates whether uniformly applied development standards or policies address identified impacts. A “yes”

response is provided if the impact is addressed by a General Plan policy identified as a mitigation measure or uniformly applied development standards or policies. If “NA” is indicated, this Environmental Checklist review concludes that there was no impact, the adopted mitigation measures are not applicable to this project, or the impact was less-than-significant and, therefore, no mitigation measures are needed.

## Discussion

A discussion of the elements of the checklist is provided under each environmental category to clarify the answers. Where appropriate, updates to the environmental setting are provided.

## Mitigation Measures

Applicable mitigation measures from the prior environmental review that would apply to the project are listed under each environmental category. New mitigation measures are included, if needed.

## Conclusions

A discussion of the conclusion relating to the need for additional environmental documentation is contained in each section.

## 3.1 AESTHETICS

ENVIRONMENTAL ISSUE AREA	Where Impact Was Analyzed in the GP EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in GP EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/ Resolve Impacts?
I. Aesthetics.						
a) Have a substantial adverse effect on a scenic vista?	Impact: Damage to Scenic Resources and Alteration of Existing Views and Visual Quality, pp. 16-19 and 16-20	No	No	No	No	NA
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	Impact: Damage to Scenic Resources and Alteration of Existing Views and Visual Quality, pp. 16-19 and 16-20	No	No	No	No	NA
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Impact: Damage to Scenic Resources and Alteration of Existing Views and Visual Quality, pp. 16-19 and 16-20	No	No	No	No	NA
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Impact: New Sources of Glare and Effects to Nighttime Views, p. 16-21	No	No	No	No	NA

### 3.1.1 Discussion

No substantial change in the environmental and regulatory settings related to aesthetics, described in the GP EIR Chapter 16, "Aesthetics," has occurred since certification of the EIR.

#### a) Have a substantial adverse effect on a scenic vista?

Impact: Damage to Scenic Resources and Alteration of Existing Views and Visual Quality in the GP EIR, defines scenic views as elements of the broader viewshed such as mountain ranges, valleys, and ridgelines. They are usually middle ground or background elements of a viewshed that can be seen from a range of viewpoints, often along a roadway or other corridor. The dominant visual characteristics within the unincorporated area of the County include open sections of the valley floor, urbanized land uses, agricultural land uses, rivers and creeks, and trees. As stated in the GP EIR, development under the General Plan would substantially alter



the existing visual character of Sacramento County and limit visual access to large areas of open space. General Plan Policy LU-16 states that the new growth areas shall be consistent with the South Sacramento Habitat Conservation Plan (SSHCP). Adoption of the SSHCP would preserve the visual quality in certain areas including the Jackson Highway Corridor New Growth Area and the Grant Line East New Growth Area. Though preservation would support the retention of some of the visual resources and visual quality of the area, the adoption of the SSHCP is not enough to reduce impacts to less than significant. The GP EIR concludes that impacts would be significant and unavoidable at the project and cumulative level.

With implementation of the proposed CAP, there is potential for short-term and long-term changes to degrade visual character and alter public views of scenic vistas. However, long-term changes would include improvements at or near grade level of existing roadways (Measures GHG-15, GHG-16, and GHG-17), would involve minor changes to the exterior of existing buildings including roof lines (Measure GOV-BE-02), planting of new trees (Measure GHG-02), and would not otherwise involve features with substantial height, bulk, or massing that could block or impede existing scenic vistas. Although Measure GHG-23 would incentivize infill development, the CAP would not result in development proposals, the fees collected by the County from developers/builders through implementation of GHG-23 would be used for the purposes of facilitating infill development in urban locations that are already targeted for development under approved plans.

Temporary construction activities such as equipment use, staging of materials, and installation of fencing would typically not involve height, bulk, or massing that would alter existing scenic views. There would be limited circumstances in which construction could involve activities or equipment, such as use of a tall crane, which would temporarily introduce substantial height, bulk, or mass within a scenic vista. Because these circumstances would be rare and the duration would be limited to relatively short periods of the overall construction phase, the temporary effect on scenic vistas would not be substantial. In addition, given the nature of the GHG reduction measures, construction activities associated with their implementation would generally occur in already disturbed, urbanized developed areas such as roadways and parking lots and would not occur within non-urbanized areas. Therefore, the project would have (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts and cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. The findings of the certified GP EIR regarding scenic views and visual character remain valid and no further analysis is required.

**b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?**

Impact: Damage to Scenic Resources and Alteration of Existing Views and Visual Quality, in the GP EIR defines scenic resources as specific features or a viewing area such as trees, rock outcroppings, and historic buildings. As stated in the GP EIR, development under the General Plan could damage scenic resources such as trees, creeks, and vernal pools. General Plan Policy LU-16 states that the new growth areas shall be consistent with the SSHCP. Adoption of the SSHCP would preserve scenic resources in certain areas including along the Jackson Highway Corridor New Growth Area. Though preservation would support the retention of some of the scenic resources of the area, adoption of the SSHCP is not enough to reduce impacts to less than significant. The GP EIR concluded that impacts would be significant and unavoidable at the project and cumulative level.

Implementation of the CAP could result in short-term and long-term changes to scenic resources along scenic highways and corridors. Short-term, temporary construction activities associated with the implementation of GHG reduction measures such as equipment use, staging of materials, and installation of fencing that would typically not result in permanent impacts to scenic resources. Because duration of these activities would be limited to relatively short periods of the overall construction phase, their temporary effect on scenic resources would not be substantial.

Long-term changes would include improvements at or near grade level of existing roadways (Measures GHG-15, GHG-16, and GHG-17), would involve minor changes to the exterior of existing buildings including roof lines (Measure GOV-BE-02), planting of new trees (Measure GHG-02), and would not otherwise involve features with substantial height, bulk, or massing that could substantially damage scenic resources. Although, Measure GHG-23 would incentivize infill development, the CAP would not result in development proposals, the fees collected by the County from developers/builders through implementation of GHG-23 would be used for the purposes of facilitating infill development in urban locations that are already targeted for development under approved plans.

Therefore, the project would have (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts and cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. The findings of the certified GP EIR regarding scenic resources remain valid and no further analysis is required.

- c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?**

See responses to a) and b) above.

- d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?**

As discussed in Impact: New Sources of Glare and Effects to Nighttime Views in the GP EIR, the glare caused by reflections from pavement, vehicles, and reflective building materials, would be visible from the rural and suburban areas and roadways surrounding new growth areas. The increase in sources of light and glare would conflict with the rural nature of rural and suburban areas and with the existing views from rural areas, which are characterized by large expanses of undeveloped open space with few sources of light and glare. As stated in the GP EIR, General Plan Policy LU-33 is intended to reduce the incidence of light pollution through zoning code updates, community and specific plans, corridor plans, district plans, transit station plans and other planning programs. Although, implementation of General Plan Policy LU-33 may help reduce the effects of light pollution, the GP EIR concluded that impacts would be significant and unavoidable.

Implementation of the CAP would result in the use of temporary lighting sources during construction of roadway improvement projects (Measures GHG-15, GHG-16, and GHG-17) and installation of photovoltaics (PV) solar systems (Measure GOV-BE-02). Implementation of the other GHG reduction measures in the proposed CAP would not involve short- or long-

term physical changes that could result in new substantial sources of light and glare. The Zoning Code would regulate new sources of light and glare to avoid affecting day or nighttime views. For example, Title III requires that lighting be directed away from residential areas and public streets so that glare is not produced that could impact the general safety of vehicular traffic and the privacy and well-being of residents. Therefore, the project would have (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. The findings of the certified GP EIR regarding light and glare remain valid and no further analysis is required.

#### Mitigation Measures

No feasible mitigation measures were referenced in the GP EIR. No additional mitigation is available.

#### CONCLUSION

There are no significant impacts that are peculiar to the project. No new impacts have occurred nor has any new information been found requiring new analysis or verification. The project would not have any potentially significant impacts or cumulative impacts that were not discussed in the GP EIR. Therefore, the conclusions of the GP EIR remain valid and approval of the project would not require additional environmental review.

## 3.2 AGRICULTURE AND FOREST RESOURCES

ENVIRONMENTAL ISSUE AREA	Where Impact Was Analyzed in the GP EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in GP EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/ Resolve Impacts?
<b>II. Agriculture and Forest Resources.</b>						
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?	Impact: Conversion of or Conflict with Farmland, pp. 3-47 to 3-60	No	No	No	No	Yes
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?	Impact: Conversion of or Conflict with Farmland, pp. 3-47 to 3-60	No	No	No	No	NA
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	Not Addressed	NA	NA	No	No	NA
d) Result in the loss of forest land or conversion of forest land to non-forest use?	Not Addressed	NA	NA	NA	No	NA
e) 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?	Impact: Conversion of or Conflict with Farmland, pp. 3-47 to 3-60	No	NA	NA	No	Yes

### 3.2.1 Discussion

The GP EIR indicates that there were approximately 245,682 acres under Williamson Act Contract in 2008. Since the certification of the GP EIR, the County has amended the Agricultural Element of the General Plan in 2017 and 2019. The 2019 update to the Agricultural Element states that the County has placed 171,492 acres of farmland under Williamson Act Contract (County of Sacramento 2019:17). Approximately 7,865 acres of Important Farmland were converted to nonagricultural uses in the County between 2016 and 2018 (California Department of Conservation 2018). No substantial change in the regulatory settings related to agriculture and forest resources have occurred since certification of the GP EIR.

**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?**

Chapter 3, "Land Use," of the GP EIR identified that the development of growth areas and community plans within the County would result in loss or conversion of important farmland. Impact: Conversion or Conflict with Farmland identifies that build-out of planned growth areas under the General Plan could result in conversion of agricultural lands. Mitigation Measure LU-6 amended General Plan Policies CO-63 and AG-5 to require 1:1 mitigation and establish a farmland mitigation fund to be used to acquire, preserve, and maintain farmlands. This impact was determined to be significant and unavoidable at the project and cumulative level.

Implementation of the GHG reduction measures in the CAP pertaining to agriculture would establish programs to encourage and support carbon farming practices on existing farmland (GHG-01), would support urban forestry initiatives within the County (GHG-02), and would promote and connect Community Supported Agriculture and agriculture-oriented community events (GHG-03). These measures would enhance use of existing farmland, and would connect County residents to farmers, locally farmed products, and relevant community events. Measure GHG-01 would provide technical support and education to implement carbon farming practices on existing farmland. The County's implementation of this measure would occur in collaboration with farmers, land managers, and other relevant stakeholders to provide education about technical practices and financial incentives and would increase community awareness about Farm to Fork events. This would not convert Important Farmland or farmland under Williamson Act contract.

The policies contained in the CAP support and enhance existing agricultural land uses to implement carbon farming practices and do not propose development that would cause incompatible land uses, convert of Important Farmland to nonagricultural use, or reduce Williamson Contract acreage. Minor land conversions may be required for infrastructure necessary to implement CAP policies. Upgraded infrastructure is generally considered compatible with agricultural uses, and all subsequent projects would be subject to the requirements of the Zoning Code. Mitigation measures identified in the GP EIR and the policies in the 2019 Agricultural Element Update would apply to subsequent projects and minimize potential for future loss of Important Farmland or farmland under Williamson Act Contract. The project would, therefore, not result in any new or substantially more severe impact associated with agricultural resources. Therefore, the project would have (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. The conclusions of the GP EIR remain valid and no further analyses are required.

**b) Conflict with existing zoning for agricultural use or a Williamson Act contract?**

See item a) above.

- c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?**

No forest land or timber resources are identified in Sacramento County. CAP policies pertaining to urban forestry would occur in developed urban environments. Therefore, the project would not result in any new or substantially more severe impacts pertaining to conversion, zoning, or land uses incompatible with forest land or timberland. Therefore, the project would have (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. The findings of the GP EIR remain valid and no further analyses is required.

- d) Result in the loss of forest land or conversion of forest land to non-forest use?**

See item c) above.

- e) 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?**

See item a) above.

#### Mitigation Measures

The GP EIR includes Mitigation Measure LU-6, which amended General Plan Policies CO-63 and AG-5 to require 1:1 mitigation and include an implementation measure to Policy AG-5 that directs the establishment of a farmland mitigation fund that can be used to acquire, preserve, and maintain farmlands. All subsequent projects, including development that may result from implementation of the CAP, would be subject to these policies and associated implementation programs designed to address the loss of farmland that can result from development. The impact remains significant and unavoidable because prime soils most suitable for agriculture are a finite resource. When an area is permanently taken out of agricultural production, there has been a net-loss of agricultural lands. Other agricultural lands may be preserved through compliance with mitigation, but new agricultural soils will not be created. No additional mitigation is available to address this impact.

#### CONCLUSION

The proposed CAP would not result in any new or substantially more severe impacts, or cumulatively considerable impacts than described in the GP EIR. The findings of the GP EIR remain valid and no further analysis is required.

### 3.3 AIR QUALITY

ENVIRONMENTAL ISSUE AREA	Where Impact Was Analyzed in the GP EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in GP EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/ Resolve Impacts?
<b>III. Air Quality.</b>						
Would the project:						
a) Conflict with or obstruct implementation of the applicable air quality plan?	Impact: Generation of On-Road Mobile Source Criteria Pollutant Emissions in Excess of SMAQMD Thresholds, pp 11-77 to 11-78	No	No	No	No	NA
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	Impact: Temporary Increase in Ozone Precursor (Reactive Organic Gasses (ROG) and Nitrogen Oxides (NOx)), Carbon Monoxide (CO), Particular Matter Exhaust, and Fugitive Dust Emissions During Grading and Construction Activities, pp.11-73 to 74	No	No	No	No	NA
	Impact: Generation of On-Road Mobile Source Criteria Pollutant Emissions in Excess of SMAQMD Thresholds, pp. 11-77 to 78					
	Impact: Generation of Stationary, Area, and Off-Road Criteria Pollutant Emissions in Excess of SMAQMD Thresholds, pp. 11-81					
c) Expose sensitive receptors to substantial pollutant concentrations?	Impact: Elevated Health Risk From The Exposure Of Nearby Sensitive Receptors To Diesel Particulate Matter During Construction, pp.11-74 to 75	No	No	No	No	NA
	Impact: Temporary Generation of Naturally Occurring Asbestos During Grading and Construction Activities, pp 11-75					
	Impact: Exposure of Sensitive Receptors to Substantial Concentrations Of Carbon Monoxide, pp.11-81 to 11-89					
	Impact: Elevated Health Risks from Exposure of Sensitive Receptors to Sacramento International Airport Emissions, pp. 11-89					
	Impact: Elevated Health Risks from Exposure Of Sensitive Receptors to Roadway Emissions, pp. 11-89 to 11-90					
	Impact: Elevated Health Risks from Exposure of Sensitive Receptors To Other Emission Sources, pp.11-91 to 11-92					
	Impact: Elevated Health Risks From Exposure of Sensitive Receptors To Roseville Rail Yard Emissions, pp. 11-92 to 11-103					

ENVIRONMENTAL ISSUE AREA	Where Impact Was Analyzed in the GP EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in GP EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/ Resolve Impacts?
	Impact: Elevated Health Risk From The Exposure Of Nearby Sensitive Receptors To Diesel Particulate Matter During Construction, pp.11-74 to 11-75 Impact: Temporary Generation of Naturally Occurring Asbestos During Grading and Construction Activities, pp. 11-75	No	No	No	No	NA
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Impact: Exposure of Sensitive Receptors to Substantial Concentrations Of Carbon Monoxide, pp.11-81 to 11-89 Impact: Elevated Health Risks from Exposure of Sensitive Receptors to Sacramento International Airport Emissions, pp. 11-89 Impact: Elevated Health Risks from Exposure of Sensitive Receptors to Other Emission Sources, pp.11-91 to 11-92 Impact: Elevated Health Risks From Exposure Of Sensitive Receptors To Roseville Rail Yard Emissions, pp. 11-92 to 11-103					

### 3.3.1 Discussion

Changes in the regulatory setting related to air quality, described in GP EIR Chapter 11, “Air Quality,” have occurred since certification of the GP EIR in 2010, as discussed below.

#### REGULATORY SETTING

##### Federal

In October 2012, the U.S. Environmental Protection Agency (EPA) and the National Highway Traffic Safety Administration, on behalf of the U.S. Department of Transportation, issued final rules to reduce air pollution and improve corporate average fuel economy standards for light-duty vehicles for model years 2017 and beyond (77 Federal Register [FR] 62624). These rules would increase fuel economy to the equivalent of 54.5 miles per gallon for the fleet of cars and light-duty trucks by model year 2025 (77 FR 62630). However, on April 2, 2018, the EPA administrator announced a final determination that the current standards should be revised. The U.S. Department of Transportation and EPA proposed the Safer Affordable Fuel-Efficient Vehicles Rule (SAFE Rule), which would amend existing corporate average fuel economy standards for passenger cars and light-duty trucks by retaining the current model year 2020 standards through model year 2026 and establish new standards covering model years 2021 through 2026.



The Clean Air Act grants California the ability to enact and enforce more strict fuel economy standards through the acquisition of an EPA-issued waiver. Each time California adopts a new vehicle emission standard, the State applies to EPA for a preemption waiver for those standards. However, Part One of the SAFE Rule, which became effective on November 26, 2019, revokes California's existing waiver to establish a nation-wide standard (84 FR 51310). At the time of preparing this environmental document, the implications of the SAFE Rule on California's future emissions are contingent upon a variety of unknown factors, including the outcome of legal challenges and policy directives by the federal government. Assuming that the SAFE Rule would continue to be implemented, mobile-source emissions in the State are anticipated to be higher in comparison to what emissions would have been without the SAFE Rule.

In April of 2021, the EPA announced that it is reconsidering a prior action that withdrew a waiver of preemption for California's zero emission vehicle (ZEV) mandate and GHG emission standards within California's Advanced Clean Car program for purposes of rescinding that action based upon concern regarding the appropriateness of the SAFE Rule, petitions for reconsideration filed by California (with a number of states and cities) and by nongovernmental organizations, and President Biden's January 20, 2021 Executive Order on "Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis."

### Ambient Air Quality Standards

Table 3.3-1 displays the updated National and California Air Quality Standards as determined by EPA and CARB.

**Table 3.3-1  
National and California Ambient Air Quality Standards**

Pollutant	Averaging Time	California Standards Concentration <sup>1,2</sup>	National Standards Primary <sup>3</sup>	National Standards Secondary <sup>3</sup>
Ozone	1 Hour	0.09 ppm	-	-
	8 Hour	0.070 ppm	0.070 ppm	0.070 ppm
PM <sub>10</sub>	24 Hour	50 µg/m <sup>3</sup>	150 µg/m <sup>3</sup>	150 µg/m <sup>3</sup>
	Annual Arithmetic Mean	20 µg/m <sup>3</sup>	-	-
PM <sub>2.5</sub>	24 Hour	-	35 µg/m <sup>3</sup>	35 µg/m <sup>3</sup>
	Annual Arithmetic Mean	12 µg/m <sup>3</sup>	12 µg/m <sup>3</sup>	15 µg/m <sup>3</sup>
CO	8 Hour	9.0 ppm	9 ppm	-
	1 Hour	20 ppm	35 ppm	-
NO <sub>2</sub>	Annual Arithmetic Mean	0.030 ppm	0.053 ppm	0.053 ppm
	1 Hour	0.18 ppm	100 ppb	-
SO <sub>2</sub>	24 Hour	0.04 ppm	0.14 ppm	-
	3 Hour	-	-	0.5 ppm (1300 µg/m <sup>3</sup> )
	1 Hour	0.25 ppm	75 ppb	-
Lead <sup>4</sup>	30 Day Average	1.5 µg/m <sup>3</sup>	-	-
	Calendar Quarter	-	1.5 µg/m <sup>3</sup>	1.5 µg/m <sup>3</sup>
	Rolling 3-Month Average <sup>5</sup>	-	0.15 µg/m <sup>3</sup>	0.15 µg/m <sup>3</sup>

Notes:

PM<sub>10</sub> = respirable particulate matter, PM<sub>2.5</sub> = fine particulate matter, CO = carbon monoxide, NO<sub>2</sub> = Nitrogen dioxide, SO<sub>2</sub> = Sulfur dioxide

<sup>1</sup> µg/m<sup>3</sup> = micrograms per cubic meter; ppm=parts per million; ppb=parts per billion

<sup>2</sup> CAAQS for ozone, CO, SO<sub>2</sub>, NO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and visibility reducing particles are values not to be exceeded. All others are not to be equaled or exceeded.

<sup>3</sup> National ambient Air Quality Standards (NAAQS), other than ozone, PM, and those based on annual averages or annual arithmetic means, are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM<sub>10</sub>, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m<sup>3</sup> is equal to or less than one. For PM<sub>2.5</sub>, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard.

<sup>4</sup> CARB has identified lead and vinyl chloride as “toxic air contaminants” with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

<sup>5</sup> NAAQS for lead, rolling 3-month average: final rule signed October 15, 2008.

Source: CARB 2016a

### Attainment Status

Sacramento County does not attain the following State and federal ambient air quality standards as of the writing of this document: 1-hour state ozone standard, 8-hour federal and state ozone standards, 24-hour federal standards for fine particulate matter with diameters that are generally 2.5 micrometers and smaller (PM<sub>2.5</sub>), and 24-hour and annual State standards for respirable particulate matter with diameters that are generally 10 micrometers and smaller (PM<sub>10</sub>) (see Table 3.3-2).

**Table 3.3-2  
Attainment Status Designations for Sacramento County**

Pollutant	Federal Standard	State Standard
Ozone	Attainment (1-hour) <sup>1</sup>	Nonattainment (1-hour) Classification-Serious <sup>2</sup>
	Nonattainment (8-hour) <sup>3</sup> Classification=Severe	Nonattainment (8-hour)
	Nonattainment (8-hour) <sup>4</sup> Classification=Severe	
	Nonattainment (8-hour) <sup>6</sup> Classification=Moderate	
PM <sub>10</sub>	Attainment (24-hour)	Nonattainment (24-hour) Nonattainment (Annual)
	Nonattainment (24-hour)	(No State Standard for 24-Hour)
PM <sub>2.5</sub>	Attainment (Annual)	Attainment (Annual)
	Attainment (1-hour)	Attainment (1-hour)
CO	Attainment (8-hour)	Attainment (8-hour)
	Unclassified/Attainment (1-hour)	Attainment (1-hour)
NO <sub>2</sub>	Unclassified/Attainment (Annual)	Attainment (Annual)
	(Attainment Pending) (1-Hour)	Attainment (1-hour) Attainment (24-hour)
SO <sub>2</sub> <sup>5</sup>	Attainment (3-month rolling avg.)	Attainment (30-day average)
Lead (Particulate)	No Federal Standard	Unclassified (1-hour)
Hydrogen Sulfide		Attainment (24-hour)
Sulfates		Unclassified (8-hour)
Visibly Reducing Particles		Unclassified (24-hour)
Vinyl Chloride		

Notes:

PM<sub>10</sub> = respirable particulate matter, PM<sub>2.5</sub> = fine particulate matter, CO = carbon monoxide, NO<sub>2</sub> = Nitrogen dioxide, SO<sub>2</sub> = Sulfur dioxide

<sup>1</sup> Air Quality meets federal 1-hour Ozone standard (77 FR 64036). EPA revoked this standard, but some associated requirements still apply. SMAQMD attained the standard in 2009. SMAQMD has requested EPA recognize attainment to fulfill the requirements.

<sup>2</sup> Per Health and Safety Code (HSC) § 40921.5(c), the classification is based on 1989 – 1991 data, and therefore does not change.

<sup>3</sup> 1997 Standard.

<sup>4</sup> 2008 Standard.

<sup>5</sup> 2010 Standard.

<sup>6</sup> 2015 Standard.

Source: SMAQMD 2021

## State

### CEQA Case Law

Since the preparation of the GP EIR, the California Supreme Court issued a ruling in *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502 regarding an air quality analysis prepared for the Friant Ranch Development Project EIR. The court asserted that the air quality analysis performed for the project did not adequately explain the nature and magnitude of long-term air quality impacts from emissions of criteria pollutants and ozone precursors. The Court held that the EIR lacked “sufficient detail to enable those who did not participate in its preparation to understand and consider meaningfully the issues the proposed project raises.”

The Court expressed the need to determine whether there was a connection between the significant project emissions and the human health impacts associated with such emissions. In

October 2020, the Sacramento Metropolitan Air Quality Management District (SMAQMD) released *Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District*. This guidance provides screening health information for projects at or below regional CEQA thresholds of significance emissions levels and selected strategic areas above thresholds of significance emissions levels. Modeling guidance for large projects located outside strategic areas is also included.

Since preparation of the GP EIR, a California Supreme Court decision (*California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, 377) has clarified CEQA with regard to the effects of existing environmental conditions on a project's future users or residents. The effects of the environment on a project are generally outside the scope of CEQA unless the project would exacerbate these conditions. Local agencies are not precluded from considering the impact of locating new development in areas subject to existing environmental hazards; however, CEQA cannot be used by a lead agency to require a developer or other agency to obtain an EIR or implement mitigation measures solely because the occupants or users of a new project would be subjected to the level of hazards specified. Thus, this analysis focusses on potential impacts from implementation of the project on the environment.

## Local

### Sacramento Metropolitan Air Quality Management District

Chapter 11, "Air Quality," in the GP EIR discusses 21 SMAQMD rules that address criteria air pollutants and toxic air contaminant (TAC) construction-related and operational emissions. The discussion is general in nature to provide a summary of potential rules that could apply to individual projects. Therefore, although rules may have been updated, they are not repeated here as they do not pertain to this program-level analysis.

The SMAQMD adopted the Guide to Air Quality Assessment in Sacramento County (SMAQMD Guide) in December 2009 and has made multiple revisions since, with the most recent revisions occurring in October 2020 to operational emissions pertaining to best management practices (BMPs) for particulate matter. The SMAQMD Guide provides methods to analyze air quality impacts from plans and projects, including screening criteria, thresholds of significance, calculation methods, and mitigation measures to assist lead agencies in complying with CEQA. During updates to the SMAQMD Guide, SMAQMD updated certain CEQA thresholds for air quality emissions. The SMAQMD Board of Directors rescinded the 2002 concentration-based thresholds for PM<sub>10</sub> and PM<sub>2.5</sub> and adopted the new mass emissions PM<sub>10</sub> and PM<sub>2.5</sub> thresholds on May 28, 2015. The TAC thresholds for stationary sources were developed as part of the SMAQMD's AB 2588 program, however the SMAQMD Board of Directors have not yet established a threshold for mobile source or non-permitted sources of TAC. Table 3.3-3 displays the SMAQMD mass emissions thresholds for construction and operation phases that pertain to this project.

Because the Sacramento Valley Air Basin is in nonattainment status with respect to ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>, SMAQMD requires that projects implement a set of Basic Construction Emission Control Practices as BMPs regardless of the significance determination. This includes guidance on quantification of construction-related emissions and measures to reduce NO<sub>x</sub> and visible emissions from off-road diesel-powered equipment, the preparation and

submission of an off-road construction inventory, and payment of offsite mitigation offset fees if construction emissions are in excess of SMAQMD construction-threshold levels.

As described in its SMAQMD Guide, “the District’s approach to thresholds of significance is key to determining whether a project’s individual emissions would result in a cumulatively considerable adverse contribution to the Sacramento Valley Air Basin’s existing air quality conditions. If a project’s emissions are estimated to be less than the thresholds, the project would not be expected to result in a cumulatively considerable contribution to the significant cumulative impact” (SMAQMD 2020:8-1).

**Table 3.3-3  
SMAQMD Thresholds of Significance**

<b>All Projects Subject to CEQA</b>		
<b>Pollutant</b>	<b>Construction</b>	<b>Operation</b>
<b>Mass Emission Thresholds</b>		
NO <sub>x</sub> ozone precursor	85 lb/day	65 lb/day
ROG (VOC) ozone precursor	None	65 lb/day
PM <sub>10</sub>	Zero (0). If all feasible BACT/BMPs are applied, then 80 pounds/day and 14.6 tons/year	Zero (0). If all feasible BACT/BMPs are applied, then 80 pounds/day and 14.6 tons/year
PM <sub>2.5</sub>	Zero (0). If all feasible BACT/BMPs are applied, then 82 pounds/day and 15 tons/year	Zero (0). If all feasible BACT/BMPs are applied, then 82 pounds/day and 15 tons/year
<b>Stationary Source Only</b>		
<b>Toxic Air Contaminant (TAC) Thresholds</b>		
Cancer Risk	An incremental increase in cancer risk greater than 10 in one million at any off-site receptor.	
Non-Cancer (Hazard Index)	Ground-level concentration of project-generated TACs that would result in a Hazard Index greater than 1 at any off-site receptor.	

Notes:

NO<sub>x</sub> = nitrogen oxides, ROG = reactive organic gases, VOC = volatile organic compound, BACT = best available control technology, BMPs = best management practices.

Source: SMAQMD 2020

SMAQMD also released Final Guidance in October 2020 in response to the Friant Ranch Decision related to discussion of the foreseeable adverse effects of project-generated emissions on exceedance the National Ambient Air Quality Standards (NAAQS) and CAAQS for criteria air pollutants and an explanation of the connection between the project’s emissions and deleterious health effects.

Applicable Air Quality Plans

2020 Sacramento Area Council of Governments Metropolitan Transportation Plan/Sustainable Communities Strategy

SACOG is designated by the federal government as the metropolitan planning organization for the Sacramento region, which requires SACOG to maintain a regional transportation plan that must be updated every 4 years in coordination with each local government. The MTP/SCS is required to be a 20-year multimodal transportation plan that is financially feasible, achieves health standards for clean air, and addresses statewide climate goals. The MTP/SCS land use

forecast identifies the general location of different types of land uses, residential densities, employment intensities, and natural resource areas.

SACOG's 2020 MTP/SCS was adopted November 18, 2019. The MTP/SCS plans for future transportation needs while improving air quality through reducing criteria air pollutant emissions generated by cars, trucks, and freight vehicles.

#### 2017 Sacramento Regional 2008 8-Hour Ozone Attainment and Further Reasonable Progress Plan

In 2017, revisions were made to the Sacramento Metropolitan Air Quality Management District's 2008 Sacramento Regional 8-hour Ozone Attainment and Reasonable Further Progress Plan (SIP Revisions). The plan documents how the region is meeting requirements under the Clean Air Act in demonstrating reasonable further progress and attainment of the 2008 NAAQS of 75 parts per billion. The plan includes an updated emissions inventory, analyzes air quality trends, and evaluates photochemical modeling results. The plan also establishes new motor vehicle emissions budgets for transportation conformity purposes.

#### **a) Conflict with or obstruct implementation of the applicable air quality plan?**

The GP EIR identifies four applicable air quality plans: the 1994 Sacramento Regional Clean Air Plan, the Sacramento Region Clean Air Plan Update/Sacramento Regional Nonattainment Area 8-hour Ozone Rate of Progress Plan, the 2008 Sacramento Regional 8-hour Ozone Attainment and Reasonable Further Progress Plan (SIP), and the 1994 Air Quality Attainment Plan. As discussed in Impact: Generation of On-Road Mobile Source Criteria Pollutant Emissions in Excess of SMAQMD Thresholds, the General Plan is not consistent with the land use assumptions of the SIP. The additional housing units contemplated in the General Plan are not consistent with the SIP assumptions, and as a result, will result in more air quality impacts than planned for within the SIP. The GP EIR concludes that this impact could be mitigated with a phasing plan for growth, as directed by Mitigation Measure LU-1, but would remain significant and unavoidable after mitigation. Notably, Mitigation Measure LU-1 was not adopted. The adopted General Plan includes alternative strategies to manage growth (LU-119 and LU-120). The impact remained significant and unavoidable, as stated in the adopted Findings of Fact and Statement of Overriding Considerations.

A project within the Sacramento Valley Air Basin has the potential to conflict with the 2017 SIP Revisions if the level of ozone precursors emissions associated with the project would be greater than the projection used in the 2017 SIP Revisions. Regional emissions inventories in the 2017 SIP Revisions were developed based on anticipated growth in population, housing, and other parameters that were included in SACOG's 2016 MTP/SCS. In general, a land use development project or plan would not interfere with the applicable air quality plans if it is consistent with the growth assumptions used to form the applicable air quality plans. Impacts on regional air quality are controlled through policies and provisions of SMAQMD and the 2017 SIP Revisions. Because SACOG's 2020 MTP/SCS must demonstrate consistency with regional air quality planning efforts, it is consistent with the 2017 SIP Revisions.

As recommended in the SMAQMD Guide, program-level analyses should evaluate whether a plan would conflict with the adopted MTP/SCS to determine whether it is consistent with the 2017 SIP Revisions. The land use development contemplated in the General Plan was used to develop the 2020 MTP/SCS. The CAP is not a growth-inducing plan and does not contemplate

a change in land uses from those discussed in the GP EIR. Implementation of the CAP would not increase development potential beyond what was assumed and analyzed in the GP EIR or result in changes to existing land use and zoning designations. Further, as discussed in subsections b) through d), below, implementation of the CAP would not increase air quality emissions such that they would exceed SMAQMD standards beyond what was considered in the GP EIR. Therefore, implementation of the CAP would not result in activities that would conflict with or obstruct implementation of the applicable air quality plans. There are no (1) peculiar impacts, (2) impacts not analyzed in the GP EIR, and (3) significant off-site impacts and cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. The findings of the certified GP EIR regarding applicable air quality plans remain valid, and no further analysis is required.

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

Sacramento County is in nonattainment for the following State and federal ambient air quality standards as of the writing of this document: 1-hour state ozone standard, 8-hour federal and State ozone standards, 24-hour federal PM<sub>2.5</sub> standard, and 24-hour and annual State PM<sub>10</sub> standards (see Table 3.1-2). As described above, SMAQMD's thresholds of significance are designed to meet the attainment goals for the pollutants for which the Sacramento Valley Air Basin is in nonattainment. SMAQMD's project-level thresholds are cumulative in nature and, therefore, a significant impact at the project-level would likely result in a cumulatively considerable contribution to a cumulative impact.

#### Construction-Generated Emissions

As discussed in GP EIR Impact: Temporary Increase in Ozone Precursor (Reactive Organic Gasses and Nitrogen Oxides), Carbon Monoxide, Particulate Matter Exhaust, and Fugitive Dust Emissions During Grading and Construction Activities, construction that would occur under implementation of the General Plan could result in the temporary generation of ozone precursor (reactive organic gasses [ROG], nitrogen oxides [NO<sub>x</sub>]), carbon monoxide (CO), and particulate matter exhaust emissions that would result in short-term impacts on ambient air quality in the project area. SMAQMD requires measures to reduce construction-related emissions that would reduce NO<sub>x</sub> and visible emissions from off-road diesel-powered equipment, require the preparation and submission of an off-road construction inventory, and require payment of offsite mitigation offset fees if construction emissions are in excess of SMAQMD construction-threshold levels. Though compliance with measures required for NO<sub>x</sub> and visible emissions from equipment would reduce construction-related emissions to a less-than-significant level, this is not the case for fugitive dust as there is not sufficient feasible mitigation to reduce levels of particulate matter arising from dust from construction. Therefore, the GP EIR concluded that even with all General Plan polices and feasible mitigation applied, construction emissions would exceed SMAQMD thresholds. This impact would be significant and unavoidable under project and cumulative conditions.

The CAP is a policy-level document that does not include any site-specific designs or proposals or grant any entitlements for development; however, implementation of the CAP measures may result in construction activities that could result in increases in criteria air pollutants and precursors. Implementation of the CAP could result in the construction of new

electric vehicle (EV) charging stations, minor bicycle infrastructure (e.g., bike lanes, bike parking), new on-site renewable energy systems, minor residential retrofits, and tree and vegetation planting (GHG-1, Flood-12, Temp-4, Flood-11, GHG-10, GOV-BE-2, GOV-FL-1, GOV-EC-4, GHG-6, and Temp-8). This type of construction activity is generally done using hand tools and small machinery, not heavy-duty construction equipment, and would involve minimal numbers of construction workers and associated worker vehicle trips. Therefore, associated construction-related criteria air pollutant emissions would also be minimal.

CAP measures that would result in improving, updating, bolstering, relocating, or upgrading the County's infrastructure or facilities to proactively prepare for future impacts from climate change such as increased flooding, sea level rise, extreme heat, and wildfire (Flood-2, Flood-6, Temp-1, Water-1, Flood-1, Flood-8, Flood-14, SLR-1); or result in new bikeways, roadways, and pedestrian and transit infrastructure improvements, electric pump conversion, stormwater infrastructure, green infrastructure, and undergrounding utility lines (GHG-14, GHG-15, GHG-16, GHG-17, GHG-25, Water-2, Flood-1, Flood-7, Flood-10) may generate criteria air pollutant emissions as a result of the use of construction equipment, additional truck hauling trips, and increased worker vehicle trips. However, the GP EIR concluded that construction activities of this type would be short term and would occur over a period of several months to several years, and additional worker vehicle trips would be minimal. Moreover, all future developments subject to CEQA would be evaluated against SMAQMD CEQA thresholds for construction air quality emissions and would be required to implement construction mitigation to reduce emissions that exceed the SMAQMD thresholds.

CAP Measure GHG-24 would increase the diversion of organic waste, to support the objectives of SB 1383. Implementation of the measure would require increased local capacity for composting and processing of organic waste; however, because this diversion is already required by regulation, the construction of new facilities would occur irrespective of CAP adoption. Therefore, associated construction emissions to develop facilities would not be a direct result of the CAP.

Regarding health effects associated with regional concentrations of criteria air pollutants, as discussed above, many of the projects and associated construction activities would be relatively minor and would not exceed SMAQMD thresholds of significance. Other, more intense construction activities may be required to implement exhaust and dust mitigation measures, depending on individual project size and anticipated construction activity. Nonetheless, all potential emission sources and activity types are consistent with those previously evaluated in the GP EIR, thus, the CAP would not result in substantially more air emissions, or associated adverse health effects, than already evaluated. Impacts would remain significant and unavoidable with all feasible mitigation applied.

### Operational Emissions

As discussed in Impact: Generation of On-Road Mobile Source Criteria Pollutant Emissions in Excess of SMAQMD Thresholds, and in Impact: Generation of Stationary, Area, and Off-Road Criteria Pollutant Emissions in Excess of SMAQMD Thresholds, implementation of the General Plan would result in operational criteria air pollutant emissions from mobile, stationary, area, and off-road sources in excess of SMAQMD threshold levels. The GP EIR concluded that development under the General Plan would exceed SMAQMD threshold levels despite General Plan policies and mitigation to reduce mobile source operational emissions and requirements to prepare Air Quality Management Plans at the project-level. Therefore, the



impact from operational criteria air pollutant emissions would be significant and unavoidable under project and cumulative conditions.

Implementation of CAP measures that would result in improving, updating, bolstering, relocating, or upgrading the County's infrastructure or facilities to proactively prepare for future impacts from climate change, as discussed above, would result in occasional maintenance activities (e.g., maintenance vehicle use, equipment replacement). These maintenance activities for facilities would be minimal or accomplished with existing personnel and in conjunction with established maintenance activities; thus, associated operational air quality emissions would also be minimal or would not increase. CAP Measure GHG-24, discussed above, would result in additional truck hauling trips to support increased local composting capacity; however, these additional truck hauling trips would occur irrespective of CAP adoption as a result of SB 1383 implementation. Therefore, associated operational source emissions due to increased truck trips would not be a direct result of the CAP.

CAP measures that pertain to the planning and design of communities would support infill, transit-oriented development, and mixed-use projects (GHG-21 and GHG-23). These types of developments, which are encouraged in the General Plan, are intended to reduce vehicle miles traveled (VMT) from vehicles that generate criteria air pollutants and precursors. The GP EIR analyzed the air quality impacts of the projected development over the General Plan planning horizon. The CAP measures facilitate infill development as envisioned in the General Plan and would not change the Land Use Diagram. Therefore, the CAP would not contribute to impacts not already analyzed in the GP EIR. Impacts would remain significant and unavoidable.

## Conclusion

The CAP would not result in increased emissions of criteria air pollutants and precursors associated with construction and operation beyond what was already considered and evaluated in the GP EIR. There are (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. The findings of the certified GP EIR regarding criteria pollutant emissions remain valid, and no further analysis is required.

### **c) Expose sensitive receptors to substantial pollutant concentrations?**

The GP EIR defines sensitive receptors as facilities that house or attract children, the elderly, people with illnesses, or others who are especially sensitive to the effects of air pollutants or may experience adverse effects from unhealthy concentrations of air pollutants. The GP EIR identified various sensitive receptors located throughout the project area including hospitals and clinics, schools, elderly housing and convalescent facilities, and residential areas.

## Construction-Generated Emissions

As discussed in Impact: Elevated Health Risk from the Exposure of Nearby Sensitive Receptors to Diesel Particulate Matter During Construction, construction activities associated with the individual projects would be short-term, occur over a period of several months to several years, and would not result in long term emissions of diesel exhaust in any given locale of the unincorporated County. Thus, this impact was determined less than significant under project and cumulative conditions. As discussed in Impact: Temporary Generation of Naturally

Occurring Asbestos During Grading and Construction Activities, there are some project elements in the General Plan that could disturb asbestiform-containing soils and generate asbestos dust during grading and construction in small portions of the Grant Line East New Growth Area. However, compliance with CARB's airborne toxics control measures (ATCM) would offset any potential impacts associated with naturally occurring asbestos. Therefore, the impact was determined to be less than significant under project and cumulative conditions.

Implementation of the CAP could result in construction-related TACs and operational TACs from mobile and stationary sources of diesel particulate matter, potentially affecting sensitive receptors. CAP measures that would result in improving, updating, bolstering, relocating, or upgrading the County's infrastructure or facilities to proactively prepare for future impacts from climate change such as increased flooding, sea level rise, extreme heat, and wildfire (Flood-2, Flood-6, Temp-1, Water-1, Flood-1, Flood-8, Flood-14, SLR-1); or result in new bikeways, roadways, and pedestrian and transit infrastructure improvements, electric pump conversion, stormwater infrastructure, green infrastructure, and undergrounding utility lines (GHG-14, GHG-15, GHG-16, GHG-17, GHG-25, Water-2, Flood-1, Flood-7, Flood-10) could result in construction activities that include the use of off-road diesel-powered construction equipment and temporarily increased truck hauling trips, generating temporary TAC emissions. These types of infrastructure updates are consistent with the types of construction evaluated in the GP EIR and implementing the CAP would not substantially increase the magnitude of the construction occurring through the buildout of growth contemplated in the General Plan. Similarly, compliance with CARB's airborne toxics control measures would offset any potential impacts associated with disturbance of naturally occurring asbestos during construction. Therefore, implementation of the CAP would not result in construction activities that generate more severe TAC emissions than what was already considered under the GP EIR.

### Operational Emissions

The GP evaluates potential exposure of sensitive receptors to substantial pollutant concentrations during operation of General Plan land uses in several discrete impacts. As discussed in Impact: Elevated Health Risks from Exposure of Sensitive Receptors to Sacramento International Airport Emissions, the Final EIR prepared for the Sacramento International Airport Master Plan indicated that health risks to the maximum exposed individual receptors (i.e., residence, school, and offsite worker) were well below the threshold value (i.e., 10 in 1 million); therefore, the impact was less than significant. As discussed in Impact: Elevated Health Risks from Exposure of Sensitive Receptors to Roseville Rail Yard Emissions, diesel exhaust from the Roseville Rail Yard could result in health risks to nearby receptors. Although the impact would be reduced as a result of General Policy AQ-3, which requires buffers to provide separation between sensitive land uses and sources of pollution or odor, the GP EIR concluded this impact was significant and unavoidable under project and cumulative conditions. As discussed in Impact: Elevated Health Risks from Exposure of Sensitive Receptors to Roadway Emissions, the modeled potential cancer risk from roadway emissions as a result of projects under the General Plan will be in excess of SMAQMD thresholds. Although General Policy AQ-3 would reduce this impact by requiring a buffer for sensitive receptors, this impact remains significant and unavoidable under project and cumulative conditions.

As discussed in Impact: Elevated Health Risks from Exposure of Sensitive Receptors to Other Emission Sources, sensitive land uses located in close proximity to types of TAC sources (i.e., roadways and truck terminals), could experience elevated health risks. Although General

Policy AQ-3 would reduce this impact by requiring a buffer for sensitive receptors, this impact remains significant and unavoidable under project and cumulative conditions. Impact: Exposure of Sensitive Receptors to Substantial Concentration of Carbon Monoxide was determined to be less than significant because there were no violations of State or federal CO standards anticipated in the project area under cumulative conditions.

Implementation of CAP measures that would result in improving, updating, bolstering, relocating, or upgrading the County's infrastructure or facilities to proactively prepare for future impacts from climate change, as discussed above, would result in occasional maintenance activities (e.g., maintenance vehicle use, equipment replacement). These maintenance activities for facilities would be minimal or accomplished with existing personnel and in conjunction with established maintenance activities; thus, associated operational mobile source TAC and CO emissions would also be minimal or would not increase.

CAP measure GHG-24, discussed in subsection (b) above, would support increased composting capacity for the purpose of reducing the amount of tonnage going to landfills, as required under SB 1383. The increased tonnage being diverted from landfills would likely result in relatively minor increases in truck hauling trips and additional truck routes to accommodate the waste diversion which would result in diesel exhaust and, therefore, emissions of TACs. However, implementation of some of the CAP measures would reduce TAC and CO emissions associated with off-road equipment and on-road vehicle use. These include CAP measure GOV-AR-01, which requires the County to replace diesel-powered support equipment with electric and alternatively fueled versions, as well as GHG-21 and GHG-23 which would support transit-oriented development, infill development, and mixed-used development that reduces VMT. Therefore, the CAP would not contribute to impacts not already analyzed in the GP EIR. Impacts from exposure of sensitive receptors to roadway emissions would remain significant and unavoidable.

## Conclusion

Projects implemented under the CAP would not result in increased emissions of TACs associated with construction and operation beyond what was already considered and evaluated in the GP EIR. There are (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. The findings of the certified GP EIR regarding exposing sensitive receptors to substantial pollutant concentrations remain valid and no further analysis is required.

### **d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?**

The GP EIR did not analyze odors that could adversely affect a substantial number of people as a result from implementation of the General Plan.

Implementation of the CAP could result in the construction of new EV charging stations, minor bicycle infrastructure (e.g., bike lanes, bike parking), new on-site renewable energy systems, minor residential retrofits, and tree and vegetation planting (GHG-1, Flood-12, Temp-4, Flood-11, GHG-10, GOV-BE-2, GOV-FL-1, GOV-EC-4, GHG-6, and Temp-8) would not likely result in odorous emissions from construction equipment because these activities would require the

use of hand held tools and minor construction equipment that would not result in odorous emissions. CAP measures that would result in new bikeways, roadways, and pedestrian and transit infrastructure improvements, stormwater infrastructure, and undergrounding utility lines (GHG-14, GHG-15, GHG-16, GHG-17, Water-2, Flood-7, Flood-10) may result in asphalt paving and diesel truck trips. Although locations for these improvements have not been identified, these types of activities would generally occur in populated residential and commercial areas. However, these activities would involve minimal use of heavy-duty diesel equipment and, thus, diesel PM emissions that generate odors would be minimal, temporary, and highly localized. Because odors would be temporary and would disperse rapidly with distance from source, construction-generated odors would not adversely affect a substantial number of people.

CAP measure GHG-24 would support the objectives of SB 1383, which would generate odors through the anaerobic decomposition of composted waste that the County would divert from landfills and through increased haul truck trips to composting facilities, among other actions proposed under the measure. Compostable materials handling operations and facilities that would receive increased volumes of compostable waste from the plan area under implementation of GHG-24 are regulated by the California Department of Resources Recycling and Recovery and required by State regulation (Title 14, California Code of Regulations [CCR], Section 17863.4) to have plans in place to prevent odors from occurring and to identify the measures that should be taken if odors do occur. The hauling of increased volumes of compostable waste to facilities via truck would result in some odors associated with diesel exhaust but would not adversely affect substantial numbers of people. General Plan Policy AQ-3 requires buffers between sensitive land uses and sources of odor, reducing impacts to sensitive land uses. The buffers shall be established using the "Air Quality and Land Use Handbook: A Community Health Perspective," and the SMAQMD's approved Protocol (Protocol for Evaluating the Location of Sensitive Land uses Adjacent to Major Roadways) to ensure adequate distance between uses.

Implementation of the CAP would result in construction and operational activities that could generate objectionable odors. Although not explicitly addressed in the GP EIR, implementation of the CAP's adaptation and GHG reduction measures would not generate substantial odors that would result in a new or more severe impact than would occur due to implementation of the GP EIR. Future discretionary projects would be required to evaluate project-specific impacts under CEQA at the time of application and project-specific mitigation would be required to minimize or avoid odor impacts to the extent feasible. There are (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that the impact would be more severe.

#### Mitigation Measures

The GP EIR references General Plan Policy AQ-3 as mitigation which requires that buffers be set to provide for separation between sensitive land uses and sources of pollution or odor. Projects implemented under the CAP would be required to comply with AQ-3.

## CONCLUSION

There are no significant impacts that are peculiar to the project. As discussed above, the project would not have any potentially significant impacts or cumulative impacts that were not discussed in the GP EIR. Therefore, the conclusions of the GP EIR remain valid and approval of the project would not require additional environmental review.

### 3.4 BIOLOGICAL RESOURCES

ENVIRONMENTAL ISSUE AREA	Where Impact Was Analyzed in the GP EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in GP EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/ Resolve Impacts?	
<b>IV. Biological Resources.</b>							
a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?	Impact: Special-Status Species, pp. 8-40 to 8-69	No	No	No	No	Yes
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?	Impact: Wetland and Riparian Areas, pp. 8-31 to 8-40 Impact: Impacts to Native Trees, pp. 8-69 to 8-75 Impact: Loss of Tree Canopy, pp. 8-75 to 8-81	No	No	No	No	Yes
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?	Impact: Wetland and Riparian Areas, pp. 8-31 to 8-40	No	No	No	No	Yes
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?	Impact: Special-Status Species, pp. 8-40 to 8-69	No	No	No	No	Yes
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Impact: Impacts to Native Trees, pp. 8-69 to 8-75 Impact: Loss of Tree Canopy, pp. 8-75 to 8-81	No	No	No	No	Yes
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	Impact: Wetland and Riparian Areas, pp. 8-31 to 8-40, Impact: Special-Status Species, pp. 8-40 to 8-69	No	No	No	No	Yes

### 3.4.1 Discussion

Biological resources are discussed in Chapter 8, “Biological Resources,” of the GP EIR. The analysis below utilizes updated results of California Natural Diversity Database and California Native Plant Society records searches of Sacramento County (CNDDDB 2021, CNPS 2021). No substantial change in the environmental setting related to biological resources has occurred since certification of the GP EIR. The regulatory setting related to biological resources described in Chapter 8 of the GP EIR is largely applicable; however, since certification of the GP EIR, the SSHCP has been adopted and is now being implemented.

**a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?**

As discussed in Impact: Special-Status Species, projects under the General Plan would be subject to Sacramento County General Plan Conservation Element policies regarding special-status species and habitat; mitigation measures under applicable Master Plan EIRs; existing federal, State, and local regulations and policies; as well as requirements of the SSHCP. The GP EIR concludes that while implementation of mitigation would reduce impacts the maximum amount feasible, development under the General Plan would result in removal and conversion of special-status species habitats and impacts related to special-status species would be significant and unavoidable under project and cumulative conditions.

Implementation of the CAP could result in adverse effects on special-status species. Several CAP measures could result in physical impacts (e.g., ground disturbance, vegetation removal, construction) including installation of EV chargers (Measure GHG-10, Measure GOV-FL-01), build-out of projects identified in the Pedestrian Master Plan (Measure GHG-15), roadway improvements associated with traffic calming measures (Measure GHG-16), potential expansion of facilities to increase local capacity for increased organic waste diversion (Measure GHG-24), construction of bicycle storage facilities (Measure GOV-EC-04), installation of on-site renewable energy systems (Measure GOV-BE-02), conversion of streetlights to LEDs (Measure GOV-ST-01), construction of infrastructure to support a regional stormwater harvest program (Measure WATER-02), improvements to existing stormwater infrastructure (Measure FLOOD-01), and improvements to existing sewage and solid-waste management infrastructure (Measure FLOOD-02).

These activities would be required to comply with existing federal, State, and local regulations and policies, as well as the SSHCP for projects located in the SSHCP plan area. These activities would also be consistent with General Plan Policies CO-58, CO-59, CO-61, CO-75, CO-76, and CO-78. The GP EIR examined impacts on biological resources that could result from buildout of new growth areas, planned communities, residential infill, and commercial corridors in the unincorporated County through the plan horizon. The types of projects that would result from CAP implementation and the locations of these projects are consistent with those described in the GP EIR. Additionally, potential impacts on special-status species resulting from projects under the CAP would be consistent with impacts described in the GP EIR. Therefore, the project would have no (1) peculiar impacts, (2) impacts not analyzed in the GP EIR, or (3) significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe

than discussed in the GP EIR. Therefore, the findings of the certified GP EIR regarding special-status species remain valid and no further analysis is required.

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

As discussed in Impact: Wetland and Riparian Areas, Impact: Impacts to Native Trees, and Impact: Tree Canopy in the GP EIR projects under the General Plan would be subject to Sacramento County General Plan Conservation Element policies regarding riparian habitat and oak woodlands; mitigation measures under applicable Master Plan EIRs; existing federal, State, and local regulations and policies; as well as requirements of the SSHCP. The GP EIR concludes that while implementation of mitigation would reduce impacts the maximum amount feasible, impacts related to riparian habitat and native trees, including oak woodlands, would be significant and unavoidable under project and cumulative conditions.

Implementation of the CAP could result in adverse effects on riparian habitat and oak woodlands. Several CAP measures could result in physical impacts (e.g., ground disturbance, vegetation removal, construction) including installation of EV chargers (Measure GHG-10, Measure GOV-FL-01), build-out of projects identified in the Pedestrian Master Plan (Measure GHG-15), roadway improvements associated with traffic calming measures (Measure GHG-16), potential expansion of facilities to increase local capacity for increased organic waste diversion (Measure GHG-24), construction of bicycle storage facilities (Measure GOV-EC-04), installation of on-site renewable energy systems (Measure GOV-BE-02), construction of infrastructure to support a regional stormwater harvest program (Measure WATER-02), improvements to existing stormwater infrastructure (Measure FLOOD-01), and improvements to existing sewage and solid-waste management infrastructure (Measure FLOOD-02). If these activities occur in areas containing riparian habitat or oak woodlands, adverse effects on these sensitive communities could occur.

These activities would be required to comply with existing federal, State, and local regulations and policies, as well as the SSHCP for projects located in the SSHCP plan area. These activities would also be consistent with General Plan Policies CO-58, CO-59, CO-61, CO-62, CO-63, CO-66, CO-71, CO-74, CO-88, CO-89, CO-90, CO-91, CO-92, CO-100, CO-101, CO-114, CO-115, CO-116, CO-117, CO-118, CO-134, CO-135, CO-137, CO-138, CO-139, CO-140, CO-145, and CO-146. The GP EIR examined impacts on biological resources that could result from buildout of new growth areas, planned communities, residential infill, and commercial corridors in the unincorporated County through the plan horizon. The types of projects that would result from CAP implementation and the locations of these projects are consistent with those described in the GP EIR. Additionally, potential impacts on riparian habitat and oak woodlands resulting from projects under the CAP would be consistent with impacts described in the GP EIR. Therefore, the project would have (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. Therefore, the findings of the certified GP EIR regarding riparian habitat and native trees, including oak woodlands remain valid and no further analysis is required.



**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?**

As discussed in Impact: Wetland and Riparian Areas in the GP EIR, projects under the General Plan would be subject to Sacramento County General Plan Conservation Element policies regarding wetlands; mitigation measures under applicable Master Plan EIRs; existing federal, State, and local regulations and policies; as well as requirements of the SSHCP. The GP EIR concludes that while implementation of mitigation would reduce impacts the maximum amount feasible, impacts related to wetlands would be significant and unavoidable under project and cumulative conditions.

Implementation of the CAP could result in adverse effects on wetlands. Several CAP measures could result in physical impacts (e.g., ground disturbance, vegetation removal, construction) including installation of EV chargers (Measure GHG-10, Measure GOV-FL-01), build-out of projects identified in the Pedestrian Master Plan (Measure GHG-15), roadway improvements associated with traffic calming measures (Measure GHG-16), potential expansion of facilities to increase local capacity for increased organic waste diversion (Measure GHG-24), construction of bicycle storage facilities (Measure GOV-EC-04), installation of on-site renewable energy systems (Measure GOV-BE-02), construction of infrastructure to support a regional stormwater harvest program (Measure WATER-02), improvements to existing stormwater infrastructure (Measure FLOOD-01), and improvements to existing sewage and solid-waste management infrastructure (Measure FLOOD-02). If these activities occur in areas containing mapped wetland habitat or in undeveloped areas where wetlands have not been previously identified, adverse effects on wetlands could occur.

As described in the GP EIR analysis of discretionary development, activities that implement the CAP measures would be required to comply with existing federal, State, and local regulations and policies, as well as the SSHCP for projects located in the SSHCP plan area. These activities would also be consistent with General Plan Policies CO-58, CO-59, CO-61, CO-62, CO-63, CO-71, CO-74, CO-83, CO-84, CO-85, CO-86, CO-115, CO-121, and CO-126. The GP EIR examined impacts on biological resources that could result from buildout of new growth areas, planned communities, residential infill, and commercial corridors in the unincorporated County through the plan horizon. The types of projects that would result from CAP implementation and the locations of these projects are consistent with those described in the GP EIR. Additionally, potential impacts on wetlands resulting from projects under the CAP would be consistent with impacts described in the GP EIR. The project would have (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. Therefore, the findings of the certified GP EIR regarding wetlands remain valid and no further analysis is required.

**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?**

Impacts on wildlife corridors and sensitive habitats that may be used as wildlife nurseries were addressed in GP EIR Impact: Special-Status Species. As discussed under this impact, projects under the General Plan would be subject to Sacramento County General Plan Conservation Element policies regarding wildlife habitat and wildlife corridors; mitigation measures under

applicable Master Plan EIRs; and existing federal, State, and local regulations and policies. The GP EIR concludes that while implementation of mitigation would reduce impacts the maximum amount feasible, development under the General Plan would result in removal and conversion of special-status species habitats, which may support wildlife corridors or wildlife nursery sites, would be significant and unavoidable under project and cumulative conditions.

Several CAP measures could result in physical impacts (e.g., ground disturbance, vegetation removal, construction) including installation of EV chargers (Measure GHG-10, Measure GOV-FL-01), build-out of projects identified in the Pedestrian Master Plan (Measure GHG-15), roadway improvements associated with traffic calming measures (Measure GHG-16), potential expansion of facilities to increase local capacity for increased organic waste diversion (Measure GHG-24), construction of bicycle storage facilities (Measure GOV-EC-04), installation of on-site renewable energy systems (Measure GOV-BE-02), conversion of streetlights to LEDs (Measure GOV-ST-01), construction of infrastructure to support a regional stormwater harvest program (Measure WATER-02), improvements to existing stormwater infrastructure (Measure FLOOD-01), and improvements to existing sewage and solid-waste management infrastructure (Measure FLOOD-02). If these activities occur within wildlife movement corridors or areas used as wildlife nurseries, disruption of wildlife movement or adverse effects on wildlife nurseries could occur.

These activities would be required to comply with existing federal, State, and local regulations and policies protecting habitats that likely function as wildlife corridors or wildlife nursery sites (e.g., streams, riparian habitat), as well as the SSHCP for projects located in the SSHCP plan area. These activities would also be consistent with General Plan Policies CO-58, CO-59, CO-61, CO-62, CO-65, CO-69, CO-75, CO-78, CO-115, CO-118, and CO-127. The GP EIR examined impacts on biological resources that could result from buildout of new growth areas, planned communities, residential infill, and commercial corridors in the unincorporated County through the plan horizon. The types of projects that would result from CAP implementation and the locations of these projects are consistent with those described in the GP EIR. Additionally, potential impacts on wildlife corridors and wildlife nursery sites resulting from projects under the CAP would be consistent with impacts described in the GP EIR. Therefore, the project would have (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. Therefore, the findings of the certified GP EIR regarding wildlife corridors and wildlife nurseries remain valid and no further analysis is required.

**e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

As discussed in Impact: Impacts to Native Trees and Impact: Tree Canopy, projects under the General Plan would be subject to Sacramento County General Plan Conservation Element policies regarding native vegetation protection, restoration, and enhancement and landmark and heritage tree protection; mitigation measures under applicable Master Plan EIRs; existing federal, State, and local regulations and policies; as well as GP EIR Mitigation Measures BR-1, BR-2, BR-3, and BR-4.

Several CAP measures could result in physical impacts (e.g., ground disturbance, vegetation removal, construction) including installation of EV chargers (Measure GHG-10, Measure GOV-FL-01), build-out of projects identified in the Pedestrian Master Plan (Measure GHG-15),

roadway improvements associated with traffic calming measures (Measure GHG-16), potential expansion of facilities to increase local capacity for increased organic waste diversion (Measure GHG-24), construction of bicycle storage facilities (Measure GOV-EC-04), installation of on-site renewable energy systems (Measure GOV-BE-02), construction of infrastructure to support a regional stormwater harvest program (Measure WATER-02), improvements to existing stormwater infrastructure (Measure FLOOD-01), and improvements to existing sewage and solid-waste management infrastructure (Measure FLOOD-02). These activities could result in removal of native vegetation, including landmark and heritage trees as defined under the County Tree Preservation Ordinance.

These activities would be required to comply with local regulations and policies, including the County Tree Preservation Ordinance and GP EIR mitigation measures. These activities would also be consistent with General Plan Policies CO-137, CO-138, CO-139, CO-140, and CO-141. Because projects under the CAP are consistent with those described in the GP EIR and would be required to comply with the County Tree Preservation Ordinance, there would be no conflict with local policies or ordinances. Therefore, the project would have (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. Therefore, the findings of the certified GP EIR regarding compliance with the County Tree Preservation Ordinance remain valid and no further analysis is required.

**f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?**

The SSHCP was discussed in the Regulatory Setting, the Proposed Framework for Management of Biological Resources, and Impact: Wetland and Riparian Areas of the GP EIR. Since adoption of the GP EIR, the SSHCP has been adopted and is now being implemented. Sacramento County is a participant in the SSHCP, and all urban development projects in the Urban Development Area and rural transportation projects that require a master plan, use permits, grading permits, or building permits would be required to participate in the SSHCP and would be subject to fees if covered species and habitat impacts would occur as a result of project implementation.

Several CAP measures could result in physical impacts (e.g., ground disturbance, vegetation removal, construction), the implementation of which would likely require participation in the SSHCP. These CAP measures include installation of EV chargers (Measure GHG-10, Measure GOV-FL-01), build-out of projects identified in the Pedestrian Master Plan (Measure GHG-15), roadway improvements associated with traffic calming measures (Measure GHG-16), potential expansion of facilities to increase local capacity for increased organic waste diversion (Measure GHG-24), construction of bicycle storage facilities (Measure GOV-EC-04), installation of on-site renewable energy systems (Measure GOV-BE-02), conversion of streetlights to LEDs (Measure GOV-ST-01), construction of infrastructure to support a regional stormwater harvest program (Measure WATER-02), improvements to existing stormwater infrastructure (Measure FLOOD-01), and improvements to existing sewage and solid-waste management infrastructure (Measure FLOOD-02).

These activities would be required to comply with the SSHCP for projects located in the SSHCP plan area. These activities would also be consistent with General Plan Policies CO-61, CO-66, CO-76, and CO-140, which require compliance with the SSHCP. Because projects under the CAP are consistent with those described in the GP EIR and would be required to comply with the SSHCP, there would be no conflict with the provisions of the SSHCP. Therefore, the project would have no (1) peculiar impacts, (2) significant impacts not analyzed in the GP EIR, or (3) significant off-site impacts and cumulative impacts not discussed in the GP EIR, (4) there is no substantial new information. Therefore, the findings of the certified GP EIR regarding compliance with the SSHCP remain valid and no further analysis is required.

#### Mitigation Measures

GP EIR Mitigation Measures BR-1 and BR-2 establish a new policy and implementation program to address impacts to native trees; Mitigation Measures BR-3 and BR-4 establish policies to address loss of tree canopy. No additional mitigation is required.

#### CONCLUSION

There are no significant impacts that are peculiar to the project. As discussed above, the project would not have any potentially significant impacts or cumulative impacts that were not discussed in the GP EIR. Therefore, the conclusions of the GP EIR remain valid, and approval of the project would not require additional environmental review.

## 3.5 CULTURAL RESOURCES

ENVIRONMENTAL ISSUE AREA	Where Impact Was Analyzed in the GP EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in GP EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/ Resolve Impacts?
V. Cultural Resources.						
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	Impact: Development Impacts to Important Historical/Structural Resource, pp. 15-25 to 15-26	No	No	No	No	Yes
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	Impact: Development Impacts to Archaeological Resources, pp. 15-22 to 15-24	No	No	No	No	NA
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	Not Analyzed	No	No	No	No	NA

### 3.5.1 Discussion

No substantial change in the environmental and regulatory settings related to cultural resources, described in the GP EIR Chapter 15, “Cultural and Paleontological Resources,” has occurred since certification of the GP EIR.

#### a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

Impact: Development Impacts to Important Historical/Structural Resource in the GP EIR discusses that while most future projects associated with the General Plan would be subject to additional environmental review consistent with CEQA, these future projects may still impact historical resources. The GP EIR identified Mitigation Measure CR-1, which required the addition of a policy to encourage adaptive reuse of historic structures. Nevertheless, the GP EIR determined that potential unforeseeable impacts may still occur to historical and architectural resources and this impact was determined to be significant and unavoidable.

Built environment historical resources are present throughout the County. The proposed CAP could result in significant impacts to historic resources related to GHG measures including energy efficiency and electrification of existing residential buildings (Measure GHG-06), future EV infrastructure (Measure GHG-10), transit access improvements (Measure GHG-14), pedestrian network improvements (Measure GHG-15), traffic calming measures (Measure GHG-16), bicycle network improvements (Measure GHG-17), infill development (Measure GHG-23), solar for County buildings (Measure GOV-BE-02), upgrades to stormwater infrastructure (Measure FLOOD-01), and improvements to sewage and solid waste infrastructure (Measure FLOOD-02) within the County.

As described for the General Plan, projects undertaken to implement the CAP would comply with General Plan policies that encourage protection and adaptive reuse of structures. These activities would be consistent with General Plan Polices CO-164 through CO-168. Future discretionary projects would also be subject to environmental review under CEQA, which may include project-level records review and architectural analysis and result in identification of necessary avoidance or mitigation measures to reduce potential impacts. However, compliance with federal, State, and local regulations, and General Plan polices, cannot ensure that all potential impacts to historical and architectural resources as a result of CAP implementation would not be substantial. As discussed in the GP EIR, unforeseeable impacts may still occur to historical and architectural resources and this impact would remain significant and unavoidable.

Therefore, there are (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. The proposed CAP would not result in any new or substantially more severe impacts to historic resources. Therefore, the conclusions of the GP EIR remain valid and no further analysis is required.

**b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?**

Impact: Development Impacts to Important Archaeological Resources in the GP EIR concluded that disturbance of unanticipated archaeological resources could occur during construction activities associated with the GP EIR. Although General Plan policies are intended to protect archaeological resources, direct and indirect impacts to archaeological resources can still occur because they are often subsurface and completely obscured from view. Due to the uncertainty of future General Plan development and associated archaeological resource impacts at the project-specific level, no feasible mitigation is available, and the impact was determined to be significant and unavoidable.

Areas with sensitivity to archaeological resources are present throughout the County. The proposed CAP could result in significant impacts to archaeological resources related to GHG measures including future EV infrastructure (Measure GHG-10), transit access improvements (Measure GHG-14), pedestrian network improvements (Measure GHG-15), traffic calming measures (Measure GHG-16), bicycle network improvements (Measure GHG-17), infill development (Measure GHG-23), upgrades to stormwater infrastructure (Measure FLOOD-01), and improvements to sewage and solid waste infrastructure (Measure FLOOD-02) within the County. These activities would be consistent with General Plan Polices CO-150 through CO-160. Future discretionary projects would also be subject to environmental review under CEQA. As part of the CEQA review process, a project-level cultural resource analysis may be conducted that evaluates potential site-specific impacts on cultural resources and identifies avoidance or mitigation measures to reduce potential impacts. As discussed in the GP EIR, unforeseeable impacts may still occur to archaeological resources and this impact would remain significant and unavoidable.

Therefore, there are (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR.

The proposed CAP would not result in any new or substantially more severe impacts to archaeological resources. Therefore, the conclusions of the GP EIR remain valid, and no further analysis is required.

**c) Disturb any human remains, including those interred outside of formal cemeteries?**

The GP EIR did not analyze potential for buildout of the General Plan to disturb human remains. Although not explicitly addressed in the GP EIR, there is nothing unique about the projects that would be implemented under the CAP that would result in a new or more severe impact than would occur due to implementation of the GP EIR. The proposed CAP does not include any development proposals and would not directly result in physical environmental effects because of the construction or operation of facilities. Therefore, the proposed CAP would not result in construction, ground disturbance, or other activities that have the potential to disturb human remains. Additionally, California law recognizes the need to protect Native American human burials, skeletal remains, and items associated with Native American burials from vandalism and inadvertent destruction. The procedures for the treatment of human remains are contained in California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097. Compliance with California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097 would provide an opportunity to avoid or minimize the disturbance of human remains, and to appropriately treat any remains that are discovered; impacts would be less than significant.

The project would have (1) no peculiar impacts, (2) no significant impacts not analyzed in the GP EIR, (3) no significant off-site impacts and cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. Therefore, the conclusions of the GP EIR remain valid, and no further analyses is required.

**Mitigation Measures**

The GP EIR includes Mitigation Measure CR-1, which added policies to the General Plan to address potential impacts to historical resources. Subsequent projects, including those that result from implementation of the CAP, would be required to comply with these policies, as applicable to the project. Due to the potential for unforeseen effects on cultural resources, this impact remains significant and unavoidable. No additional mitigation is available to address this impact.

**CONCLUSION**

The proposed CAP would not result in any new or substantially more severe impacts, or cumulatively considerable impacts, than described in the GP EIR. Therefore, findings of the GP EIR remain valid and no further analysis is required.

## 3.6 ENERGY

ENVIRONMENTAL ISSUE AREA	Where Impact Was Analyzed in the GP EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in GP EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/ Resolve Impacts?
VI. Energy.						
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Impact: Increased Demand for Energy Facilities and Services Public Services, p. 4-28	No	No	No	No	N/A
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Impact: Increased Demand for Energy Facilities and Services Public Services, p. 4-28	No	No	No	No	N/A

### 3.6.1 Discussion

Energy consumption, generation, and consistency with existing plans are factors that can be used to identify potential environmental issues associated with energy resources in proposed projects. The GP EIR, certified in April of 2010, considered such factors as part of energy specific analyses within Chapter 4, "Public Services." This chapter contained background information on energy services, applicable energy regulations, and an analysis of increased demand for energy specific services and facilities that could result from the General Plan update. The impact analysis concluded that proposed changes to General Plan policies were neutral or beneficial, resulting in a less than significant impact that required no mitigation.

Chapter 12, "Climate Change," of the GP EIR evaluated the role of energy usage and production in local initiatives to address climate change. The analysis considered the inclusion of proposed CAP policies to increase energy efficiency and use of renewable energy sources, and the effects of expanded renewable energy generation on land use and natural resources. Mitigation was recommended for this impact, with one energy-specific measure described in Mitigation Measure CC-2(c), calling for an update to the Energy Element of the General Plan to include policies for siting alternative energy production, such as solar and wind farms. Mitigation Measure CC-2(c) was recommended to reduce climate change impacts from GHG emissions from energy production. This topic is analyzed separately in Section 3.8, "Greenhouse Gas Emissions," of this Addendum.

The environmental setting pertaining to energy services in GP EIR Chapter 4, "Public Services," (p. 4-7) remains applicable to this analysis. A notable update is that the referenced plan for the Sacramento Municipal Utility District (SMUD) to increase their share of electricity generated from hydropower sources was achieved, moving from 22 percent in 2009 to 44



percent in 2019.<sup>1</sup> The regulatory settings pertaining to energy services on page 4-12 of the GP EIR also remain applicable to this analysis. The California Public Utilities Commission continues to serve as the State agency overseeing the operation of investor-owned utilities in California, including Pacific Gas and Electric Company, which provides gas energy services in the countywide project area. Energy efficiency standards for appliances and new buildings continue to be subject to CCR Titles 20 and 24, which are enforced by appliance retailers and local building departments. The Warren-Alquist Act continues to serve as the authority for California Energy Commission (CEC) to develop policies aimed at reducing wasteful, inefficient, and unnecessary consumption of energy resources. This agency's role includes, statewide energy resource planning, regular updates to CCR Titles 20 and 24, review of locally adopted reach codes, and review of energy planning by Publicly Owned Utilities including SMUD which provides electricity service within the project area. New State and local plans for renewable energy and energy efficiency that have been adopted since the GP EIR include SMUD's *2030 Zero Carbon Plan* (SMUD 2021), and updates to both the State's Renewable Portfolio Standards and the General Plan Energy Element.

**a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**

The GP EIR evaluated the increased demand for energy facilities and services associated with the adoption of the General Plan and found the impact to be less than significant. Demand for energy facilities and services leading to environmental impacts would be even less under the proposed CAP, due to the introduction of a series of additional energy-saving measures that promote enhanced energy conservation from projects that are constructed and operated within the County. Measures GHG-04, GHG-05, GHG-07, GHG-07 are aimed at achieving increased energy efficiency and higher efficiency all-electric building design within existing and new buildings throughout the County. Measures GHG-09, GHG-10, GHG-18, GHG-19, GHG-27, and GHG-29 support a transition to electric and higher fuel efficiency vehicles in the transportation sector. While supporting a transition to EVs would necessitate the construction of EV charging infrastructure, such equipment would be incorporated into the parking areas of buildings that already have access to electricity for building operations. Wastefulness of energy resources would be reduced by GHG-24, which would divert organic waste away from disposition into landfills and toward the production of alternative biofuels for buildings and transportation uses. Inefficient energy use would be avoided by the CAP introducing reach energy codes for new buildings, which exceed the State-mandated Title 24 standards that have already become more stringent than those enforced at the time of the initial General Plan approval in 2011. By requiring new residential buildings to be all-electric in GHG-07, the County would support the elimination of natural gas lines, which provide an unnecessary source of energy for buildings given the availability of electric heat pump and induction cooking technologies. Construction-related energy consumption would be reduced by GHG-29, which aims to transition construction equipment to alternative fuels and electricity, in contrast to existing sources derived from fossil fuels. For these reasons, the proposed CAP would not result in potentially significant environmental impacts due to wasteful, inefficient, or

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<sup>1</sup> PowerContentLabel.ashx (smud.org)

unnecessary consumption of energy resources during project construction and operations and the impact would remain less than significant.

Therefore, there are (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. The proposed CAP would not result in any new or substantially more severe impacts to energy resources. Therefore, the conclusions of the GP EIR remain valid and no further analysis is required.

**b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency**

The proposed CAP would support State efforts identified by the CEC and California Public Utilities Commission to decarbonize buildings, promote energy efficiency, and support renewable energy generation. Measures such as GHG-06 and GHG-07, which aim to transition buildings to all-electric fuel sources, would leverage the anticipated availability of SMUD provided electricity sources with increased shares of renewable energy generation, as part of their 2030 Zero Carbon Energy Plan. There would be no obstruction of plans at either the State or local level, and this impact would be less than significant. Therefore, there are (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. The proposed CAP would not result in any new or substantially more severe impacts to energy resources. Therefore, the conclusions of the GP EIR remain valid and no further analysis is required.

**Mitigation Measures**

No mitigation measures were identified in for the certified GP EIR regarding energy, nor are any additional mitigation measures required the project.

**CONCLUSION**

There are no significant impacts that are peculiar to the project. As discussed above, the project would not have any potentially significant impacts or cumulative impacts that were not discussed in the GP EIR. Therefore, the conclusions of the GP EIR remain valid and approval of the project would not require additional environmental review.

### 3.7 GEOLOGY AND SOILS

ENVIRONMENTAL ISSUE AREA	Where Impact Was Analyzed in the GP EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in GP EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/ Resolve Impacts?
<b>VII. Geology and Soils.</b>						
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	Impact: Geologic Hazards, pp. 13-30 to 13-35	No	No	No	No	NA
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						
ii) Strong seismic ground shaking?						
iii) Seismic-related ground failure, including liquefaction?						
iv) Landslides?	Impact: Soils and Soil Hazards, pp. 13-25 to 13-27	No	No	No	No	NA
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, as updated), 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?						
	Impact: Direct or Indirect Impact Resulting in the Destruction of a Unique Paleontological Resource, pp. 15-33 to 15-34	No	No	No	No	Yes.

### 3.7.1 Discussion

No substantial change in the environmental and regulatory settings related to geology, soils, or paleontological resources, described in the GP EIR Chapter 13, "Geology and Soils," and Chapter 15, "Cultural and Paleontological Resources," has occurred since certification of the GP EIR.

Since preparation of the GP EIR, a California Supreme Court decision (*California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, 377) has clarified CEQA with regard to the effects of existing environmental conditions on a project's future users or residents. The effects of the environment on a project are generally outside the scope of CEQA unless the project would exacerbate these conditions. Local agencies are not precluded from considering the impact of locating new development in areas subject to existing environmental hazards; however, CEQA cannot be used by a lead agency to require a developer or other agency to obtain an EIR or implement mitigation measures solely because the occupants or users of a new project would be subjected to the level of hazards specified. Previous discussions of effects of the environment related to geology and soils are included herein for disclosure purposes.

- 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 California Geological Survey Special Publication 42.)**
  - ii) **Strong seismic ground shaking?**
  - iii) **Seismic-related ground failure, including liquefaction?**
  - iv) **Landslides?**

As discussed in GP EIR Impact: Geologic Hazards, all structures would be built to the requirements of the Sacramento County General Plan Safety Element policies, the Uniform Building Code (UBC), and California Building Code (CBC). All new development and redevelopment would be required to comply with the current adopted CBC, which includes design criteria for seismic loading and other geologic hazards. Compliance with the CBC requires that new developments incorporate design criteria for geologically induced hazards that govern sizing of structural features and provide calculation methods to assist in the design process. The GP EIR concludes that impacts related to geologic hazards would be less than significant under project and cumulative conditions.

Implementation of the CAP could support future EV infrastructure (Measure GHG-10), transit access improvements (Measure GHG-14), updates to community and corridor plans (Measure GHG-21), and infill development (Measure GHG-23) within the County. These activities would be consistent with General Plan Policies SA-1, SA-3, and SA-4. These activities would also be required to comply with provisions for geological stability established by the UBC and CBC. In addition, the CAP would not amend, revise, or be inconsistent with any existing regulations related to geologic hazards. Therefore, the project would have (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts

not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. Therefore, the findings of the certified GP EIR regarding geologic hazards remain valid and no further analysis is required.

**b) Result in substantial soil erosion or the loss of topsoil?**

As discussed in Impact: Soils and Soil Hazards in the GP EIR, implementation of the General Plan would allow new development and redevelopment. Grading and site preparation activities associated with such development could temporarily remove groundcover that could expose the underlying soils to erosion. Ground-disturbing activities would be required to comply with the Sacramento County Land Grading and Erosion Control Ordinance (Sacramento County Code Ch. 16.44), which would minimize damage to surrounding properties and public rights-of-way; limit degradation to the water quality of watercourses; and curb the disruption of drainage system flow caused by the activities of clearing, grubbing, grading, filling, and excavating land. Additionally, any development involving clearing, grading, or excavation that causes soil disturbance of one or more acres would be required to prepare and comply with a stormwater pollution prevention plan, which provides a schedule for implementation and maintenance of erosion control measures and a description of the erosion control practices, including appropriate design details and a schedule. The GP EIR concludes that impacts from soil erosion and loss of topsoil would be less than significant under both project and cumulative conditions.

Implementation of the CAP could support future EV infrastructure (Measure GHG-10), transit access improvements (Measure GHG-14), pedestrian network facilities (Measure GHG-15), bicycle network facilities (Measure GHG-17), improvements to travel connectivity (Measure GHG-22), infill development (Measure GHG-23), improvements to sewage and solid-waste management infrastructure (Measure FLOOD-02), undergrounding utility lines (Measure FLOOD-07), and restoring concrete channels (Measure FLOOD-11) within the County. These activities would be consistent with General Plan Policies CO-24, CO-27, CO-28, CO-29, and CO-100. These activities would also be required to comply with provisions for soil and geological stability established by Sacramento County Code Ch. 16.44. In addition, the CAP would not amend, revise, or be inconsistent with any existing regulations related to soils.

The GP EIR examined impacts related to soil erosion and loss of topsoil that could result from buildout of new growth areas, planned communities, residential infill, and commercial corridors in the unincorporated County through the plan horizon. The types of projects that would result from CAP implementation and the locations of these projects are consistent with those described in the GP EIR. Therefore, the project would have (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. Therefore, the findings of the certified GP EIR regarding soil erosion remain valid and no further analysis is required.

**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?**

The GP EIR determined that future structures and roadways that could be developed in the County under the General Plan could experience structural damage to foundations and roads if located on expansive or unstable soils (Impact: Soils and Soil Hazards). The construction permitting process within the County requires preparation of geotechnical reports for

development located within areas known to contain expansive soils to identify potential hazards that may affect a project, as well as measures to eliminate the hazardous soil conditions. In addition, structural design must conform to the criteria detailed in the UBC and CBC (Chapters 16, 18, 33 and the Appendix to Chapter 33). Policy SA-1 of the Safety Element of the General Plan also states that the County shall require geotechnical reports and impose appropriate mitigation measures for new development in geologically sensitive areas. The GP EIR concludes that impacts from geologic instability would be less than significant under both project and cumulative conditions.

Implementation of the CAP could support future EV infrastructure (Measure GHG-10), transit access improvements (Measure GHG-14), updates to community and corridor plans (Measure GHG-21), infill development (Measure GHG-23), and solar for County buildings (Measure GOV-BE-02) within the County. These activities would be consistent with General Plan Polices SA-1 and SA-3. These activities would also be required to comply with provisions for geological stability established by the UBC and CBC (Chapters 16, 18, 33 and the Appendix to Chapter 33). In addition, the CAP would not amend, revise, or be inconsistent with any existing regulations related to geology and soils. Therefore, the project would have (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. Therefore, the findings of the certified GP EIR regarding soil instability remain valid and no further analysis is required.

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

See analysis under item c) above.

**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?**

As described in the GP EIR, the County shall require geotechnical reports and impose the appropriate mitigation measures for new development located in seismic and geologically sensitive areas. Implementation of the CAP would not require the use of septic systems in areas of unsuitable soils because the CAP does not include development proposals that would require the use of septic systems. The project would have (1) no peculiar impacts, (2) no significant impacts not analyzed in the GP EIR, (3) no significant off-site impacts and cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information that was not known at the time the 2010 GP EIR was certified. Therefore, no further analysis is required.

**f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

GP EIR Impact: Direct or Indirect Impact Resulting in the Destruction of a Unique Paleontological Resource, determined that paleontological resources are at risk for unintentional destruction during future development under the General Plan. This impact was identified as potentially significant. Mitigation Measure CR-2 requires mitigation to reduce potential impacts where development could adversely affect paleontological resources, monitoring for construction in paleontologically sensitive areas, and a certified geologist or

paleoresources consultant to determine appropriate protection measures when resources are discovered. The GP EIR determined that while implementation of this mitigation measure would reduce impacts associated with implementation of the General Plan, there are still unforeseeable impacts that may occur to paleontological resources. The GP EIR determines that this impact would be significant and unavoidable.

Implementation of the CAP could disturb paleontological resources because the CAP includes policies that would result in ground-disturbing activities. Implementation of the CAP could support future EV infrastructure (Measure GHG-10), transit access improvements (Measure GHG-14), updates to community and corridor plans (Measure GHG-21), infill development (Measure GHG-23), and solar for County buildings (Measure GOV-BE-02) within the county. These activities would be consistent with General Plan Policies CO-161, CO-162, and CO-163. These activities would also be required to comply with Mitigation Measure CR-2. In addition, the CAP would not amend, revise, or be inconsistent with any existing regulations related to paleontological resources. Therefore, the project would have (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. The findings of the certified GP EIR pertaining to paleontological resources remain valid and no further analysis is required.

#### Mitigation Measures

GP EIR Mitigation Measure CR-2 requires mitigation to reduce potential impacts where development could adversely affect paleontological resources, monitoring for construction in paleontologically sensitive areas, and that a certified geologist or paleoresources consultant determine appropriate protection measures when resources are discovered. No additional mitigation is available to address this impact.

## CONCLUSION

There are no significant impacts that are peculiar to the project. As discussed above, the project would not have any potentially significant impacts or cumulative impacts that were not discussed in the GP EIR. Therefore, the conclusions of the GP EIR remain valid and approval of the project would not require additional environmental review.

## 3.8 GREENHOUSE GAS EMISSIONS

ENVIRONMENTAL ISSUE AREA	Where Impact Was Analyzed in the GP EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in GP EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/ Resolve Impacts?
<b>VIII. Greenhouse Gas Emissions.</b>						
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Impact: Impact of the Project on Climate Change, pp.12-26 to 12-39	No	No	No	No	NA
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Impact: Impact of the Project on Climate Change, p. 12-28	No	No	No	No	NA

### 3.8.1 Discussion

There have been several new or updated GHG regulations and updates to the environmental setting since the GP EIR was prepared. The following sections discuss these updates.

#### ENVIRONMENTAL SETTING

The GP EIR evaluated increases in GHG emissions associated with General Plan buildout in comparison to the 2005 GHG (community emissions) inventory that was prepared for the County prior to preparation of the GP EIR. Since that time, the County prepared an updated GHG inventory using a 2015 baseline year that included community and government operations. For comparison purposes, the County's total GHG emissions were 6,555,802 MTCO<sub>2e</sub> in 2005 and 4,853,647 MTCO<sub>2e</sub> in 2015. This decrease in emissions can be attributed to implementation of adopted County, State, and regional policies, plans, and programs intended to reduce the community's GHG emissions, more accurate inventorying tools and data, and increased State regulations to meet GHG emissions reductions goals. In addition, the 2015 inventory estimated that government operations resulted in 123,397 MTCO<sub>2e</sub>. The 2015 GHG emissions are shown by sector in Table 3.8-1.



**Table 3.8-1  
Sacramento County Baseline GHG Emissions by Sector**

Sector	2015 Baseline GHG Emissions (MTCO <sub>2</sub> e/year)
<b>Community GHG Emissions</b>	
Residential Energy	1,193,311
Commercial Energy	890,603
On-Road Vehicles	1,671,596
Off-Road Vehicles	196,769
Solid Waste	352,909
Agriculture	254,899
High-GWP Gases	251,085
Wastewater	27,253
Water-Related	15,222
<b>Total Community GHG Emissions</b>	<b>4,853,647</b>
<b>Government Operations GHG Emissions</b>	
Employee Commute	38,290
Vehicle Fleet	29,591
Buildings and Facilities	28,247
Airports (buildings and facilities)	18,310
Water-Related	4,665
Streetlights and Traffic Signals	3,729
Wastewater	565
<b>Total Government Operations GHG Emissions</b>	<b>123,397</b>

Source: Climate Action Plan, Table 1

### Updates to the County's Climate Change Projections

The Climate Change Vulnerability Assessment (see Appendix B to the proposed CAP) analyzes the potential direct and indirect impacts resulting from climate change within the County. According to the Intergovernmental Panel on Climate Change, global average temperature is expected to increase relative to the 1986–2005 period by 0.3–4.8 °C (0.5–8.6 degrees Fahrenheit [°F]) by the end of the 21st century (2081–2100), depending on future GHG emissions scenarios (IPCC 2014:SPM-8). According to California Natural Resources Agency, downscaling of global climate simulation model data suggest that average temperatures in California are projected to increase 2.7 °F above 2000 averages by 2050 and, depending on emissions levels, 4.1–8.6 °F by 2100 (CNRA 2012b:2). Annual average temperatures in Sacramento County are projected to climb steadily to the end of the century. Sacramento County's historical average temperature (based on data from 1961 to 1990) is 61.9 °F. Under the low-emissions scenario, annual average temperature is projected to increase by 1.5 °F by 2050 and 3.5 °F by 2090; under the high-emissions scenario, annual average temperatures are projected to increase by 4.1 °F by 2050 and 6.2°F by 2090. As a result of rising average maximum temperatures from climate change, the County is projected to experience up to 17 extreme heat days annually by mid-century and 24 extreme heat days by the late century under the medium emissions scenario. Under the high emissions scenario, the County is projected to experience up to 22 extreme heat days annually by mid-century and 40 extreme heat days by the late century (CEC 2020).

Chapter 12, “Climate Change,” of the GP EIR analyzes the potential impacts of climate change on temperature, water supply and flooding, surface water quality, ground water, fisheries and aquatic resources, sea levels, wildland fire risk, and agriculture in the County. Since the writing of the GP EIR, new models, analysis, and tools have been developed to provide more accurate climate change impact projections across California. Cal-Adapt, a climate change scenario planning tool developed by the CEC, is the recommended tool to perform climate change projections and vulnerability assessments for local governments. Cal-Adapt downscales global climate simulation model data to local and regional resolution under both high- and low-emissions scenarios. Cal-Adapt includes a variety of tools to assess projections for direct and indirect climate impacts that can be assessed by county boundaries. The direct, or primary, changes for Sacramento County include average temperature, annual precipitation, and sea-level rise. Secondary impacts, which can occur as a result of individual or a combination of these changes, include extreme heat, wildfire risk, and changes in precipitation (Sacramento County 2017a).

Cal-Adapt provides a historical annual average rate of precipitation of about 18 inches for Sacramento County. Overall precipitation in Sacramento County is expected to decline over the course of the century, with annual averages decreasing more substantially under the high-emissions scenario. Reduced levels of precipitation, as a result of changes to precipitation patterns, could result in future constraints to surface water and ground water. Changes in precipitation patterns may also result in less frequent but more extreme storm events. While Sacramento County is projected to experience an overall decrease in precipitation, the precipitation that falls may have more intense characteristics, such as high volume of rain falling over a shorter period with stronger and more destructive wind patterns. These changes in frequency, intensity, and duration of extreme storm events, coupled with increases in annual temperature may result in earlier and more rapid melting of the Sierra Nevada snowpack, and could lead to an increase in flow rate of surface waters in Sacramento County. These projected changes could lead to increased flood magnitude and frequency.

Further, increased temperatures and changes in precipitation patterns associated with climate change are expected to increase the risk of wildfire in Sacramento County. Higher temperatures and reduced precipitation result in reduced average moisture in vegetation, which leads to the drying out of fuel loads that support more intense wildfires. Cal-Adapt predicts that wildfire risk in Sacramento County will likely increase slightly in the near term and subside during mid- to late-century.

The average global sea level rose approximately 7 inches during the last century. If it continues to reflect global trends, sea level along the California coastline could be 10-18 inches (0.25–0.45 meters) higher in 2050 than 2000 levels, and 31-55 inches higher (0.78–1.4 meters) than 2000 levels by the end of this century (CNRA 2012a:9). The southeastern portion of Sacramento County near the Delta is vulnerable to the influences of sea-level rise. Figure 13 in the Climate Change Vulnerability Assessment for the CAP shows the projected areas at risk for inundation of 0.00-4.00+ meters during a 100-year flood event combined with a 1.41 meter rise in sea-level (Sacramento County 2017a).

## REGULATORY SETTING

There have been several new or updated GHG executive orders, plans, policies, or regulations issued since the certification of the GP EIR. The following regulations are applicable in addition to those provided in the GP EIR.

### State

#### Climate Change Scoping Plan

The 2017 Scoping Plan lays out the framework for achieving the mandate of SB 32 of 2016 to reduce Statewide GHG emissions to at least 40 percent below 1990 levels by the end of 2030 (CARB 2017). The 2017 Scoping Plan also identifies how GHGs associated with proposed projects could be evaluated under CEQA (CARB 2017:101-102). Specifically, it states that achieving “no net increase” in GHG emissions is an appropriate overall objective of projects evaluated under CEQA if conformity with an applicable local GHG reduction plan cannot be demonstrated. CARB recognizes that it may not be appropriate or feasible for every development project to mitigate its GHG emissions to zero and that an increase in GHG emissions due to a project may not necessarily imply a substantial contribution to the cumulatively significant environmental impact of climate change.

The 2017 Scoping Plan also describes an approach for detailed and adequately supported GHG reduction plans (including CAPs) to become a tool for streamlining project-level environmental review. Under CEQA, individual projects that comply with the strategies and actions within an adequate local CAP can streamline the project-specific GHG analysis. Supreme Court rulings have recognized that GHG determinations in CEQA should be consistent with the statewide Scoping Plan goals, and that CEQA documents taking a goal-consistency approach may soon need to consider a project’s effects on meeting the State’s longer term post-2020 goals (CARB 2017:101).

#### Executive Order B-30-15, Senate Bill 32, and Assembly Bill 197 of 2016

On April 20, 2015, Governor Brown signed EO B-30-15 to establish a California GHG reduction target of 40 percent below 1990 levels by 2030. The Governor’s EO aligns California’s GHG reduction targets with those of leading international governments such as the 28-nation European Union, which adopted the same target in October 2014. California met the target of reducing GHG emissions to 1990 levels by 2020, as established in the California Global Warming Solutions Act of 2006 (AB 32). In August 2016, Governor Brown signed SB 32 and AB 197, which serve to extend California’s GHG reduction programs beyond 2020. SB 32 codified the targets established by EO B-30-15 for 2030 by amending 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. California’s new emission reduction target of 40 percent below 1990 levels by 2030 sets the next interim step in the State’s continuing efforts to pursue the long-term target expressed under Executive Order S-3-05 to reach the ultimate goal of reducing emissions 80 percent below 1990 levels by 2050. This is in line with the scientifically established levels needed in the U.S. to limit global warming below 2 °C, the warming threshold at which major climate disruptions are projected, such as super droughts and rising sea levels.

## Senate Bill 375

SB 375, signed by Governor Schwarzenegger in September 2008, aligns regional transportation planning efforts, regional GHG emission reduction targets, and land use and housing allocation. SB 375 requires metropolitan planning organizations to adopt a SCS or Alternative Planning Strategy, showing prescribed land use allocation in each metropolitan planning organization's (MPO's) Regional Transportation Plan. CARB, in consultation with the MPOs, is to provide each affected region with reduction targets for GHGs emitted by passenger cars and light trucks in their respective regions for 2020 and 2035. SACOG serves as the MPO for Sacramento County. SACOG's 2020 MTP/SCS was adopted November 18, 2020. SACOG was tasked by CARB to achieve a 19 percent per capita reduction in GHG emissions from automobiles and light trucks by 2035.

## Advanced Clean Cars Program

In January 2012, CARB approved the Advanced Clean Cars program which combines the control of GHG emissions and criteria air pollutants, as well as requirements for greater numbers of zero-emission vehicles, into a single package of regulatory standards for vehicle model years 2017 through 2025. The new regulations strengthen the GHG standard for 2017 models and beyond. This will be achieved through existing technologies, the use of stronger and lighter materials, and more efficient drivetrains and engines. The program's zero-emission vehicle regulation requires battery, fuel cell, and/or plug-in hybrid EVs to account for up to 15 percent of California's new vehicle sales by 2025. The program also includes a clean fuels outlet regulation designed to support the commercialization of zero-emission hydrogen fuel cell vehicles by requiring increased numbers of hydrogen fueling stations throughout the state. By 2025, when the rules will be fully implemented, the statewide fleet of new cars and light trucks will emit 34 percent fewer GHGs and 75 percent fewer smog-forming emissions than the statewide fleet in 2016 (CARB 2016b).

As discussed above in Section 3.3, "Air Quality," the EPA rescinded the waiver that allowed these standards with Part One of the SAFE Rule, which became effective on November 26, 2019. In April of 2021, the EPA announced that it is reconsidering a prior action that withdrew a waiver of preemption for California's ZEV mandate and GHG emission standards within California's Advanced Clean Car program based upon concern regarding the appropriateness of the SAFE Rule, petitions for reconsideration filed by California (with a number of states and cities) and by nongovernmental organizations, and President Biden's January 20, 2021 Executive Order on "Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis."

## Senate Bill 1383

SB 1383, signed September 19, 2016, establishes targets to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025. The law grants the California Department of Resources Recycling and Recovery regulatory authority to achieve the organic waste disposal reduction targets and establishes an additional target that not less than 20 percent of the amount of edible food currently disposed of is recovered for human consumption by 2025.

## Executive Order B-48-18

In January 2018, Governor Brown signed Executive Order B-48-18 requiring all State entities to work with the private sector to have at least 5 million ZEVs on the road by 2030, as well as install 200 hydrogen fueling stations and 250,000 EV charging stations by 2025. It specifies that 10,000 of the EV charging stations should be direct current fast chargers. This order also requires all State entities to continue to partner with local and regional governments to streamline the installation of ZEV infrastructure. The Governor's Office of Business and Economic Development is required to publish a Plug-in Charging Station Design Guidebook and update the 2015 Hydrogen Station Permitting Guidebook (Eckerle and Jones 2015) to aid in these efforts. All State entities are required to participate in updating the 2016 Zero-Emissions Vehicle Action Plan (Governor's Interagency Working Group on Zero-Emission Vehicles 2016) to help expand private investment in ZEV infrastructure with a focus on serving low-income and disadvantaged communities. Additionally, all State entities are to support and recommend policies and actions to expand ZEV infrastructure at residential land uses, through the Low Carbon Fuel Standard Program, and recommend how to ensure affordability and accessibility for all drivers.

## Renewables Portfolio Standards

The State has passed legislation requiring electric utilities to generate certain percentages of electricity marketed to consumers from renewable energy sources by specified target years. California utilities are required to generate 33 percent of their electricity from renewables by 2020 (SB X1-2 of 2011); 52 percent by 2027 (SB 100 of 2018); 60 percent by 2030 (also SB 100 of 2018); and 100 percent by 2045 (also SB 100 of 2018).

## Building Efficiency Standards

The energy consumption of new residential and nonresidential buildings in California is regulated by CCR Title 24, Part 6, Building Energy Efficiency Standards (California Energy Code). CEC updates the California Energy Code every 3 years with more stringent design requirements for reduced energy consumption, which results in the generation of fewer GHG emissions. The 2019 Building Energy Efficiency Standards, which were adopted on May 9, 2018, went into effect starting January 1, 2020. The current California Energy Code will require builders to use more energy-efficient building technologies for compliance with increased restrictions on allowable energy use. CEC estimates that the combination of required energy-efficiency features and mandatory solar panels in the 2019 California Energy Code will result in new residential buildings that use 53 percent less energy than those designed to meet the 2016 California Energy Code. CEC also estimates that the 2019 California Energy Code will result in new commercial buildings that use 30 percent less energy than those designed to meet the 2016 standards, primarily through the transition to high-efficacy lighting (CEC 2018).

## Executive Order N-79-20

In September 2020, Governor Newsom signed EO N-79-20 establishing a State goal that 100 percent of in-state sales of new passenger cars and trucks will be zero-emission by 2035, 100 percent of medium- and heavy-duty vehicles in the State be zero-emission by 2045 and by 2035 for drayage trucks, and to transition to 100 percent zero-emission off-road vehicles and equipment by 2035.

## Local

### Sacramento Municipal Utilities District, Climate Emergency Declaration and 2030 Zero Carbon Plan

In July 2020, the SMUD Board of Directors adopted a climate emergency declaration that committed to working toward an ambitious goal of delivering carbon neutral electricity by 2030. The 2030 Clean Energy Vision is SMUD's overarching goal to reach zero-carbon emissions in their power supply by 2030. The 2030 Zero Carbon Plan, adopted March 30, 2021, is the roadmap for SMUD to achieve the zero-carbon goal through 100 percent renewable generation by 2030, 15 years in advance of the State-mandated Renewable Portfolio Standards.

### Sacramento Air Quality Management District

SMAQMD is the primary agency responsible for addressing air quality concerns in all of Sacramento County. SMAQMD also recommends methods for analyzing project-generated GHGs in CEQA analyses and offers multiple potential GHG reduction measures for land use development projects. SMAQMD developed thresholds of significance to provide a uniform scale to measure the significance of GHG emissions from land use and stationary source projects in compliance with CEQA and AB 32. SMAQMD's goals in developing GHG thresholds include ease of implementation; use of standard analysis tools; and emissions mitigation consistent with AB 32. On October 23, 2014, the SMAQMD Board of Directors adopted GHG thresholds. On April 23, 2020, the SMAQMD Board of directors adopted an updated land development GHG threshold, including BMPs. For land development and construction projects, the GHG emissions threshold is 1,100 metric MTCO<sub>2e</sub>/year during the construction phase, and the operational phase emission threshold requires projects to demonstrate consistency with the Climate Change Scoping Plan by implementing applicable BMPs, or equivalent on-site or off-site mitigation. All projects must implement tier 1 BMPs, which include BMP 1 and 2 that require projects to be designed and constructed without natural gas infrastructure (BMP 1) and require projects to meet the current CalGreen 2 standards with EV ready spaces (BMP 2). For projects that exceed 1,100 MTCO<sub>2e</sub>/year, after implementation of BMP 1 and 2, BMP tier 2 implementation is required. BMP tier 2, or BMP 3, sets a target for all residential projects to achieve a 15 percent VMT reduction per construction worker compared to existing average VMT traveled and retail projects must achieve a no net increase in VMT consistent with SB 743. There are also stationary GHG thresholds, but these do not apply to the CAP because the CAP does not result in stationary GHG emitting sources (SMAQMD 2020).

### Sacramento County Climate Emergency Resolution

The Climate Emergency Resolution, approved by the County's Board of Supervisors in December 2020, declared a climate emergency, and calls for County action to chart a path towards and achieve carbon neutrality by 2030. The County's goal is aligned with EO B-55-18 related to achieving carbon neutrality.

#### **a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

The GP EIR establishes Mitigation Measures CC-1 and CC-2 that require County adoption of the AB 32 goal as a General Plan policy and preparation of a CAP and development

thresholds. In concert with State and federal activities, this mitigation was intended to offset the effects of implementing the General Plan. Based on the uncertain nature of the impact, however, the GP EIR concludes that implementation of the General Plan would have a significant and unavoidable contribution to climate change. This CAP implements Mitigation Measure CC-2.

The CAP is a policy-level document that does not include any site-specific designs or proposals or grant any entitlements for development; however, construction and operation of facilities identified in GHG reduction measures and adaptation strategies that would be implemented with CAP adoption have the potential to directly or indirectly emit GHG emissions. As shown in the CAP in Table 3, “Summary of Community GHG Reduction Measures” and Table 5, “Summary of Government Operation GHG Reduction Measures,” overall, the CAP is expected to reduce the County’s communitywide and government operational GHG emissions by 772,095 MTCO<sub>2e</sub>/year and 21,040 MTCO<sub>2e</sub>/year, respectively, in 2030.

CAP measures that would result in the construction of new EV charging stations, minor bicycle infrastructure (e.g., bike lanes, bike parking), new on-site renewable energy systems, minor residential retrofits, and tree and vegetation planting would generate GHG emissions from construction worker vehicle trips and possible truck hauling trips. This construction is generally done using hand tools and small machinery which would not result in substantial emissions. These types of projects would not involve substantial numbers of workers or extensive use of construction equipment. Occasional maintenance activities (e.g., maintenance vehicle use, equipment replacement) for these facilities would be minimal or accomplished with existing personnel and maintenance activities; thus, associated operational GHG emissions would also be minimal or would not increase.

CAP measures that would result in improving, updating, bolstering, relocating, or upgrading the County’s infrastructure or facilities to proactively prepare for future impacts from climate change such as increased flooding, sea level rise, extreme heat, and wildfire would result in the use of construction equipment, construction worker vehicle trips, and truck hauling trips. These activities would generate GHG emissions. As discussed in the GP EIR, construction emissions associated with these types of infrastructure improvements would be evaluated at the time of development under separate environmental reviews. It is not anticipated that construction would result in new significant or more substantial impacts as compared to those already addressed by the GP EIR. Further, it is anticipated that the overall net benefit from the CAP associated with permanent reductions in GHG emissions countywide, would outweigh any short-term, minor construction-related GHG emissions.

CAP Measure GHG-24 would increase local capacity for composting and processing of organic waste corresponding with supporting the objectives of SB 1383 regulations. This measure would likely result in the expansion of composting programs, increased anaerobic digestion, and food recovery activities, which would reduce GHG emissions by decreasing methane associated with organic waste decomposing in landfills. The County currently has some of these facilities, although this measure could result in new waste composting facilities or the expansion of facilities to handle more feedstock in accordance with the increase in annual tonnage diverted. However, counties are required to expand their capacity for organic waste processing under SB 1383; thus, these facilities would be established whether or not the CAP was adopted. These activities could result in a minor increase in vehicle trips and emissions related to new or expanded collections services or worker trips. Nonetheless, these

potential trip increases and associated mobile source emissions would be minimal in comparison to the net benefit associated with the reduction in methane emissions as a result of less organic matter decomposing in a landfill.

CAP Measure GHG-9 would create an incentive program to trade in fossil fuel-powered landscaping equipment with electric versions, requiring residents to drive to a drop-off location to take part in the program. This would result in a minimal increase in vehicle trips; however, these emissions would be offset by the increase in electric powered equipment as opposed to fossil fuel. Thus, the minimal GHG emissions associated with an increase in vehicle trips from implementation of these measures would not result in significant GHG emissions.

CAP measures that would result in new bikeways, roadways, and pedestrian infrastructure improvements; electric pump conversion; stormwater infrastructure; green infrastructure; and undergrounding utility lines (Measures GHG-14, GHG-15, GHG-16, GHG-17, GHG-25, Water-2, Flood-1, Flood-7, Flood-10) would result in the use of construction equipment, construction worker vehicle trips, and truck hauling trips. The specific actions that would be undertaken are not known and evaluation of such actions would be speculative; however, it is assumed that these projects would result in trenching, ground disturbance, or piping. These types of projects could involve additional workers or use of construction equipment that generate GHG emissions. However, the emissions resulting from these construction activities would be minor and occasional maintenance activities for these projects would be minimal or within existing operations; thus, associated operational GHG emissions would also be minimal. In addition, Measures GHG-14 and GHG-15 would reduce GHG emissions from vehicles through improvements to the active transportation network and would likely offset any minimal construction activities.

Implementation of the CAP includes measures that support infill, transit-oriented development, and mixed-use projects (Measures GHG-21 and GHG-23) to further reduce emissions, reduce VMT, and increase building energy efficiency. The GP EIR already considered the construction and operation effects of the projected development over the planning horizon. Further, these type of development projects would occur under current projected conditions and undergo project-specific environmental review. These CAP measures prioritize or incentivize infill, transit-oriented development, and mixed-use projects, all types of measures intended to reduce overall VMT and GHG emissions from mobile sources. Additionally, CAP Measures GHG-05 and GHG-07 would increase energy efficiency requirements in new residential and commercial development resulting in future reduced emissions associated with operation of this new development.

Overall, the CAP would reduce GHG emissions generated within the unincorporated County by supporting low and zero emissions vehicles and equipment, encouraging green building practices, encouraging carbon sequestration practices, reducing VMT, increasing alternative modes of transportation, and increasing the use of renewable clean energy. In addition, GHG reduction measures that support energy efficiency and renewable energy generation would reduce GHG emissions at power plants generating electricity that serve the unincorporated County. Thus, any temporary GHG emissions would be offset by the overall net benefit of GHG emissions reduction after implementation of the CAP. Further, the GP EIR contemplated these types of developments and associated GHG emissions; thus, the CAP would not result in substantial increase or more severe impact compared to what was evaluated in the GP EIR. There are (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts and cumulative impacts not discussed in the GP EIR, and (4) there is no



substantial new information indicating that an impact would be more severe than discussed in the GP EIR. The findings of the certified GP EIR regarding GHG emissions remain valid and no further analysis is required.

**b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

Based on Appendix G of the State CEQA Guidelines, a project would have a significant impact if it would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Applicable plans, policies, or regulations include: Statewide GHG emission targets established by AB 32, SB 32, Executive Order B-30-15, and Executive Order S-3-05; the 2017 Scoping Plan; and SACOG's 2020 MTP/SCS.

As discussed in Chapter 12, "Climate Change," under the section heading "Impact of the Project on Climate Change" (p. 12-26) of the GP EIR, the County set an emissions reduction target aligned with the AB 32 Scoping Plan, the only regulatory document adopted by the State at the time of preparation of the GP EIR that set a GHG reduction goal. The County's target was to reduce modeled GHG emissions for the 2005 baseline year projections by 15 percent by 2020. The GP EIR identified a significant impact because the projected buildout of the proposed General Plan would result in a 6.7 MMT increase above the 2005 baseline level by the year 2020; 7.7 MMTs above the 1990 level required by AB 32. As a result, Mitigation Measures CC-1 and CC-2 of the GP EIR directed the County to include a General Plan policy to set the AB 32 Scoping Plan 2020 reduction goal as a County target and to develop a comprehensive plan laying out the policy framework and general strategies to reduce GHG emissions to help meet the 2020 target. The County is in the process of fulfilling its obligation under Mitigation Measure CC-2 through development of the CAP, which outlines ways to further reduce emissions and be aligned State targets for future years.

As discussed in Chapter 1.3, "Greenhouse Gas Reduction Targets for 2030," of the CAP, the CAP primarily focuses on reducing emissions by 2030. The selected future milestone year of 2030 is based on the State's GHG reduction target year established in key State legislation and policies, including AB 32, SB 32, EO S-3-05, EO B-30-15, and the 2017 Scoping Plan. California's GHG reduction targets have been legislatively adopted for 2030, while the 2050 goal is expressed in an EO. The State's 2030 target is an interim target needed to meet the longer-term 2050 target; therefore, the County's CAP aligns with the State in setting a 2030 target.

Chapter 1.2, "Baseline and Forecast Greenhouse Gas Emissions," of the CAP provides an assessment of the County's prepared GHG inventories for community and government operations for a baseline year of 2015. Using population, employment, and housing data, the results from the 2015 baseline year were forecast to 2030. The State aims to reduce annual statewide GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. The State's 2030 target and 2050 goals are expressed as reducing emissions to 6 MTCO<sub>2e</sub> per capita and 2 MTCO<sub>2e</sub> per capita by 2030 and 2050, respectively. Based on the County's 2030 forecast emissions and populations projections, shown in Table 1 "Sacramento County Baseline and Forecast GHG Emissions by Sector" of the CAP, the County is expected to have an emissions rate of 4.8 MTCO<sub>2e</sub> per capita in 2030. This is below the rate of 6 MTCO<sub>2e</sub> per capita by 2030 recommended to local governments by CARB in the 2017 Scoping Plan. This indicates that the County is on track to meet a legislated State target in 2030, and it also shows progress toward meeting longer term state goals for GHG reduction by 2050 under EO S-3-05 and EO B-30-15.

In 2019, SACOG adopted an update to the MTP/SCS which provides policies and implementation actions for GHG reductions in the on-road transportation sector, consistent with statewide targets set by CARB pursuant to SB 375. SACOG's adopted GHG emissions reduction target put the region on track to achieve a 12 percent reduction in per capita emissions between 2020 and 2035, for an annual reduction rate of 0.80 percent. The CAP's 2030 target puts the County on track to reduce per-capita GHG emissions in the on-road transportation sector by 13 percent in 2030 from a baseline year of 2015, for an annual reduction rate of 0.85 percent. Thus, the CAP's targets show annual reduction on par with those established in the 2020 MTP/SCS. Further, CAP measures that would encourage transit-oriented development, complete streets, transit improvement projects, EV infrastructure, updates and development of bike infrastructure, and adaption of vulnerable transportation infrastructure are consistent with policy priorities discussed in Chapter 2, "Policies and Implementation," of the 2020 MTP/SCS. Therefore, the CAP is aligned with the targets set by CARB and SACOG for GHG emission reduction goals and includes CAP measures consistent with SACOG policy priorities. Implementation of the CAP would not conflict with the regional MTP/SCS.

The CAP also supports other State and regional regulations, plans, and standards that aim to further reduce GHG emissions. GHG measures that would install on-site renewable energy systems and incentivize solar carports support regulations regarding increased use of renewables for electricity production (SB 100 and SBX1-2). GHG measures that would encourage carbon farming plans, reduce VMT, and require EV infrastructure would support programs regarding carbon neutrality goals (County's 2020 Climate Emergency Resolution, EO B-55-18, Advance Clean Car Program, SB 743, B-48-18, and N-79-20). GHG measures that would require increased composting capacity to support solid waste reduction are consistent with State regulations regarding organic waste disposal reduction (AB 1383). GHG measures would also increase use of energy efficient appliances, support energy efficient retrofits, and require that specific building and equipment standards are aligned with current standard and programs regarding energy efficiency and building electrification (e.g., Building Efficiency Standards, SMUD plans).

The GP EIR acknowledges changing regulations pertaining to GHG emissions and the potential for standards to change throughout the planning horizon. Due to the inherent uncertainty, the GP EIR concludes that implementation of the General Plan would have a significant and unavoidable impact related to conflict with regulations. The GP EIR establishes Mitigation Measures CC-1 and CC-2 that require County adoption of the AB 32 goal as a General Plan policy and preparation of a CAP and development thresholds. The proposed CAP implements Mitigation Measure CC-2. Implementation of the CAP would be consistent with the County's overall goal to reduce GHG emissions, consistent with Statewide targets, support a variety of other State and local plans, policies, and regulations, and fulfill the County's obligation under Mitigation Measure CC-2 in the GP EIR and, therefore, does not conflict with an applicable plan, policy, or regulation. There are no (1) peculiar impacts, (2) impacts not analyzed in the GP EIR, (3) significant off-site impacts and cumulative impacts not discussed in the GP EIR, or (4) substantial new information indicating that an impact would be more severe than discussed in the GP EIR. The findings of the certified GP EIR regarding consistency with regulations remain valid and no further analysis is required.

## Mitigation Measures

GP EIR Mitigation Measure CC-1 directed the County to include a policy in the GP that set a GHG reduction goal for the County to reduce GHG emissions to 1990 levels by the year 2020

through State and local action. Mitigation Measure CC-2 was included to implement measures to meet the reduction goal defined in CC-1. The project implements GP EIR Mitigation Measure CC-2, which required the County to prepare a CAP. No additional mitigation is required.

## CONCLUSION

There are no significant impacts that are peculiar to the project. As discussed above, the project would not have any potentially significant impacts or cumulative impacts that were not discussed in the GP EIR. Therefore, the conclusions of the GP EIR remain valid and approval of the project would not require additional environmental review.

### 3.9 HAZARDS AND HAZARDOUS MATERIALS

ENVIRONMENTAL ISSUE AREA	Where Impact Was Analyzed in the GP EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in GP EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/ Resolve Impacts?
<b>IX. Hazards and Hazardous Materials.</b>						
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Significance Criteria, p. 14-12	No	No	No	No	NA.
	Impact: Hazardous Materials within Development Areas, pp. 14-13 to 14-14	No	No	No	No	NA
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment?	Impact: Exposure Through Renovation or Demolition of Existing Structures that Contain Asbestos, p. 14-16					
	Impact: Exposure to Lead Through Renovation or Demolition of Existing Structures That Contain Lead-Based Paint, p.14-17					
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Significance Criteria, p. 14-12	No	No	No	No	Yes
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Impact: Hazardous Materials within Development Areas, pp. 14-13 to 14-14	No	No	No	No	NA
e) For a project located within 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 result in a safety hazard or excessive noise for people residing or working in the project area?	Impact: Airport Safety Zone Incompatibility, pp. 3-61 to 3-63 Impact: Airport Noise Compatibility, pp. 10-18 to 10-19	No	No	No	No	NA
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Not Analyzed	No	No	No	No	NA.
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	Not Analyzed	No	No	No	No	NA.

### 3.9.1 Discussion

No substantial change in the environmental and regulatory settings related to hazards and hazardous materials, described in GP EIR Chapter 14, "Hazardous Materials," and Chapter 17, "Summary of Impacts and Their Disposition," has occurred since certification of the GP EIR. In addition, the County has adopted several emergency response and evacuation plans since certification of the GP EIR, as summarized below.

#### REGULATORY SETTING

##### Area Plan for Emergency Response to Hazardous Materials Incidents in Sacramento County

The Area Plan describes the responsibilities of local, State and federal agencies during incidents involving the release and/or threatened release of hazardous materials and provides information for agencies involved in hazardous material response within Sacramento County.

##### Emergency Operations Plan

The Emergency Operations Plan addresses the County's planned response to extraordinary emergency situations associated with natural disasters, technological incidents, and national security emergencies in or affecting Sacramento County. This plan focuses on operational concepts and would be implemented relative to large-scale disasters, which can pose major threats to life, property, and the environment, requiring unusual emergency responses.

The Functional Annexes contain descriptions of the methods that the County and its departments follow for critical functions during emergency operations. The Evacuation Annex provides strategies and procedures to document the agreed upon strategy for the Operational Area's response to emergencies that involve the evacuation of people from an impacted area. This involves coordination and support for the safe and effective evacuation of the population.

**a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

The GP EIR determines that the General Plan does not involve the generation, transport, or emission of hazardous substances (p.14-12). As discussed under Irreversible Environmental Changes in Chapter 17 of the GP EIR, the routine transport, storage, use, and disposal of hazardous materials associated with development under the General Plan would be required to comply with all applicable federal, State, and local regulations during construction and operation. Facilities that use hazardous materials are required to obtain permits and comply with appropriate regulatory agency standards designed to avoid hazardous materials releases.

Implementation of the CAP could support future EV infrastructure (Measure GHG-10), transit access improvements (Measure GHG-14), pedestrian network improvements (Measure GHG-15), traffic calming measures (Measure GHG-16), bicycle network improvements (Measure GHG-17), infill development (Measure GHG-23), solar for county buildings (Measure GOV-BE-02), upgrades to stormwater infrastructure (Measure FLOOD-01), and improvements to sewage and solid waste infrastructure (Measure FLOOD-02) within the County. These activities would be consistent with General Plan Policies HM-4, HM-7, HM-11, and HM-14. These activities would also be required to comply with federal, State, and local regulations. As described in the GP EIR, compliance with these regulations is anticipated to substantially avoid

the release of hazardous materials associated with routine use. In addition, the CAP would not amend, revise, or be inconsistent with any existing regulations related hazards and hazardous materials. Therefore, there are (1) no peculiar impacts, (2) no significant impacts not analyzed in the GP EIR, (3) no significant off-site impacts and cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information that was not known at the time the GP EIR was certified. The findings of the certified GP EIR regarding impacts from the routine transport, use, or disposal of hazardous materials remain valid and no further analysis is required.

**b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment?**

The potential for the General plan to 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 is evaluated across several impacts in the GP EIR. The GP EIR concludes that the potential release of existing contamination in development areas, and release of asbestos and lead through renovation and demolition, would be less than significant under project and cumulative conditions.

Implementation of the CAP could support future EV infrastructure (Measure GHG-10), transit access improvements (Measure GHG-14), pedestrian network improvements (Measure GHG-15), traffic calming measures (Measure GHG-16), bicycle network improvements (Measure GHG-17), infill development (Measure GHG-23), solar for county buildings (Measure GOV-BE-02), upgrades to stormwater infrastructure (Measure FLOOD-01), and improvements to sewage and solid waste infrastructure (Measure FLOOD-02) within the county. These activities would be consistent with General Plan Policies HM-4, HM-7, HM-10, HM-11, and HM-14. These activities would also be required to comply with federal, State, and local regulations. As described in the GP EIR, compliance with these regulations is anticipated to substantially avoid the release of hazardous materials associated with routine use.

The CAP also includes Measure GHG-01 Carbon Farming, through which the County would work with local farmers, ranchers, and land managers to promote and increase carbon sequestration on agricultural lands. This measure is expected to reduce the application of synthetic fertilizers (by 2030, 113,286 acres of cropland are assumed to be fertilized with compost instead of synthetic fertilizer). This would reduce the routine use and transport of potentially hazardous materials in the unincorporated county. In addition, the CAP would not amend, revise, or be inconsistent with any existing regulations related hazards and hazardous materials. Therefore, there are (1) no peculiar impacts, (2) no significant impacts not analyzed in the GP EIR, (3) no significant off-site impacts and cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information that was not known at the time the GP EIR was certified. The findings of the certified GP EIR regarding impacts from accidental release of hazardous materials remain valid and no further analysis is required.

**c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

There is the potential for development proposed under the General Plan to be within 0.25-mile of a school. However, as discussed in Chapter 14, "Hazardous Materials," implementation of the General Plan would not involve emissions of hazardous substances. All future projects facilitated by implementation of General Plan would be required to comply with relevant

federal, State, and local regulations that require strict adherence to guidelines regarding the safe use, transportation, and disposal of hazardous materials, as well as reducing the potential for people or the environment to be affected by an accidental release of hazardous materials. Because such laws are established to be protective of human health and the environment, compliance with applicable regulations is sufficient to ensure that any hazardous materials used during General Plan implementation would not result in hazardous emissions within 0.25-mile of an existing or proposed school.

Implementation of the CAP supports future development of GHG reduction and resiliency projects; however, the types of development that would support implementation of the CAP (e.g., infrastructure) would not involve emissions of hazardous substances. In addition, several CAP measures would result in future reductions in emissions such as eliminating fossil fuel consumption in residential buildings (Measure GHG-07), increasing use of electric landscaping equipment (Measure GHG-09), increasing use of EVs (Measure GHG-10), and reducing vehicle miles travelled (Measure GHG-11) within the county. These activities would be consistent with General Plan Policies HM-4, HM-6, HM-7, HM-11, HM-12, HM-13, and HM-14. Therefore, there are (1) no peculiar impacts, (2) no significant impacts not analyzed in the GP EIR, (3) no significant off-site impacts and cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information that was not known at the time the GP EIR was certified. The findings of the certified GP EIR regarding emissions of hazardous substances within 0.25-mile of a school remain valid and no further analysis is required.

**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?**

As discussed in Impact: Hazardous Materials within Development Areas in the GP EIR, there are hazardous materials cleanup sites within the General Plan area; however, existing regulations preclude development of any known cleanup site until the hazardous condition has been abated to the point that the proposed use will neither aggravate the hazardous condition nor be adversely affected by the hazardous condition. The GP EIR concludes that impacts related to development of a hazardous materials site would be less than significant under project and cumulative conditions.

Implementation of the CAP would not result in hazards related to hazardous materials sites because the CAP does not include development proposals. Implementation of the CAP could support future EV infrastructure (Measure GHG-10), transit access improvements (Measure GHG-14), pedestrian network improvements (Measure GHG-15), traffic calming measures (Measure GHG-16), bicycle network improvements (Measure GHG-17), infill development (Measure GHG-23), solar for county buildings (Measure GOV-BE-02), upgrades to stormwater infrastructure (Measure FLOOD-01), and improvements to sewage and solid waste infrastructure (Measure FLOOD-02) within the county. These activities would be consistent with General Plan Policies HM-7, HM-8, HM-9, HM-10, and HM-14. These activities would also be required to comply with existing regulations that preclude development of any known cleanup site until the hazardous condition has been abated. Therefore, the project would have (1) no peculiar impacts, (2) no significant impacts not analyzed in the GP EIR, (3) no significant off-site impacts and cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. Therefore, the findings of the certified GP EIR regarding hazardous materials sites remain valid and no further analysis is required.

**e) For a project located within 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 result in a safety hazard or excessive noise for people residing or working in the project area?**

An airport land use compatibility plan (ALUCP), formerly referred to as a comprehensive land use plan (CLUP) addresses airport expansion, noise/land use compatibility, and safety (GP EIR p. 10-7). As discussed under Impact: Airport Safety Zone Incompatibility, allowable uses within airport safety zones are restricted based on the ALUCPs/CLUPs in effect at the time a project is proposed under the General Plan. Similarly, the GP EIR determines that compliance with the ALUCP/CLUP in effect at the time development is proposed “will ensure that people residing or working in the vicinity of County airports will not be exposed to excessive airport noise” (p. 10-19). The General Plan concluded that these restrictions would result in less-than-significant safety and noise impacts.

Implementation of the CAP would not result in development projects that would be located within ALUCP boundaries. Implementation of CAP could support future solar installations for county buildings (Measure GOV-BE-02). Future development activities would be consistent with General Plan Policy LU-87 that requires proposed new land use projects and land use practices near airports within Sacramento County consider consistency with current federal, State, and local airport land use compatibility regulations, orders, policies, plans, standards and guidance pertaining to public safety. Therefore, the project would have (1) no peculiar impacts, (2) no significant impacts not analyzed in the GP EIR, (3) no significant off-site impacts and cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. Therefore, the findings of the certified GP EIR regarding airport safety remain valid and no further analysis is required.

**f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

The GP EIR does not directly address the potential for General Plan implementation to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Emergency response and emergency evacuation plans are designed to respond to a possible emergency situation (e.g., fires, floods, earthquakes). These plans provide a process for evacuating people from danger and preventing or minimizing loss of life and property. As discussed in Impact: Roadways Level of Service – Proposed Project, development under the General Plan would have a significant and unavoidable impact on the roadway system within the plan area. Emergency evacuation plans could be adversely affected by impacts to circulation and roadways in the plan area associated with implementation of the General Plan.

Implementation of the CAP would not physically interfere with an emergency response plan because it does not include development proposals. Implementation of the CAP could support future transit access improvements (Measure GHG-14), pedestrian network improvements (Measure GHG-15), traffic calming measures (Measure GHG-16), bicycle network improvements (Measure GHG-17), and infill development (Measure GHG-23) within the county. Future activities would be consistent with General Plan Policies SA-32, SA-33, and SA-36.



Construction associated with implementation of the CAP would not likely hinder emergency response activities or physically interfere with established evacuation routes. Although construction activities could temporarily impair roadways used for emergency response and evacuation, standard construction procedures for development of a construction management plan would address these conditions and would develop alternative routes. Projects requiring encroachment permits for temporary construction activities in public roadways that could be used for emergency response or evacuation are generally required to prepare traffic mitigation plans that address traffic control during the period when project construction is occurring within public right-of-way. Standard construction procedures provided in traffic mitigation plans to address temporary road closures that would be required during construction, include notification of emergency responders. Potential for long-term impacts would be evaluated on a project-specific basis.

The CAP supports focused growth in existing urbanized areas and reduced reliance on personal automobiles. Transit systems, including buses, train, and ferries, provide an additional means of evacuating people during a less rapid but urgent evacuation. The CAP includes investments in transit systems along with the emphasis on growth near transit that could serve as vital resources. Therefore, the project would have (1) no peculiar impacts, (2) no significant impacts not analyzed in the GP EIR, (3) no significant off-site impacts and cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. Therefore, the findings of the certified GP EIR related to impacts from interference with emergency plans remain valid and no further analysis is required.

**g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?**

This impact was not evaluated in the GP EIR. As discussed in the General Plan Safety Element Background Report (Sacramento County 2017b), wildland fires are a potential hazard in Sacramento County. Grass fires can occur in rural areas and along the American River parkway. Peat fires can ignite in the Delta. Sacramento County has a Fire Prevention Ordinance (Sacramento County Code Title 17, Fire Prevention) that details firebreak requirements, hazardous weed removal, and enforcement. The Fire Prevention Ordinance requires a firebreak area of at least 30 feet from all structures, combustible fences, vehicles, and combustible storage. Local fire districts are given the authority to require firebreak areas exceeding 30 feet, based on the existing conditions of an area.

Implementation of the CAP could support future infrastructure projects; however, it would not include any habitable structures. Under CAP Measure FIRE-01, the County would work with CAL FIRE, Metro Fire, and any other fire department operating within the boundaries of the County to pro-actively map and identify locations within the County that are newly at risk, or at higher risk, for wildfire hazards as a result of climate change and its impacts. Therefore, the CAP would reduce the potential for people or structures to be exposed to a significant risk of loss, injury, or death involving wildland fires compared to conditions evaluated in the GP EIR.

Urban tree planting that occurs through implementation of the CAP (Measure GHG-02) would occur in accordance with the Zoning Code and include provisions for proper maintenance to maximize tree health and ensure longevity. In addition, the CAP includes Measure FIRE-03, which would update the County's tree planting guidelines to identify wildfire resistant species and the appropriate species of trees for fire hazard severity zones.

Therefore, the project would have (1) no peculiar impacts, (2) no significant impacts not analyzed in the GP EIR, (3) no significant off-site impacts and cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. The findings of the certified GP EIR related to impacts related to wildland fires remain valid and no further analysis is required.

#### Mitigation Measures

A significant and unavoidable impact related to accidental release of hazardous materials was identified in the GP EIR; however, and no mitigation measures are available to reduce this impact to a less-than-significant level.

#### CONCLUSION

There are no significant impacts that are peculiar to the project. As discussed above, the project would not have any new potentially significant impacts or cumulative impacts and there is no new information available that was not known and could not have been known at the time the GP EIR was certified as complete. Therefore, the conclusions of the GP EIR remain valid and approval of the project would not require additional environmental review.

## 3.10 HYDROLOGY AND WATER QUALITY

ENVIRONMENTAL ISSUE AREA	Where Impact Was Analyzed in the GP EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in GP EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/ Resolve Impacts?	
<b>X. Hydrology and Water Quality.</b>							
a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	Impact: Project Effects on Water Quality, pp. 7-51 to 7-57	No	No	No	No	Yes
b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Impact: Interference with Groundwater Recharge, pp. 6-53 to 6-66	No	No	No	No	Yes
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 substantial on- or offsite erosion or siltation;	Impact: Project Effects on Water Quality, pp. 7-51 to 7-57	No	No	No	No	Yes
ii)	Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	Impact: Project Effects on Floodplains, pp. 7-21 to 7-27	No	No	No	No	NA
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	Impact: Project Effects on Water Quality, pp. 7-51 to 7-57 Impact: Project Effects on Floodplains, pp. 7-21 to 7-27	No	No	No	No	Yes
iv)	Impede or redirect flood flows?	Impact: Project Effects on Floodplains, pp. 7-21 to 7-27	No	No	No	No	NA.
d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Impact Floodplain Effects on the Project, pp. 7-27 to 7-51	No	No	No	No	Yes
e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Impact: Project Effects on Water Quality, pp. 7-51 to 7-57 Impact: Interference with Groundwater Recharge, pp. 6-53 to 6-66	No	No	No	No	Yes

### 3.10.1 Discussion

No substantial change in the environmental and regulatory settings related to hydrology and water quality, described in GP EIR Chapter 5, "Sewer Services," Chapter 6, "Water Supply," and Chapter 7, "Hydrology and Water Quality," has occurred since certification of the GP EIR.

The setting information provided in these chapters remains applicable to the analysis. In addition, the following recent regulation is pertinent to the discussion of sustainable groundwater management.

## REGULATORY SETTING

### Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act (SGMA) was enacted in September of 2014. Pursuant to SGMA, sustainable groundwater management is the management and use of groundwater in a manner that can be maintained during a 50-year planning and implementation horizon without causing undesirable results. SGMA establishes a new structure for locally managing California's groundwater and includes the following key elements:

- provides for the establishment of a groundwater sustainability agency (GSA) by one or more local agencies overlying a designated groundwater basin or subbasin, as established by California Department of Water Resources (DWR) Bulletin 118-03;
- requires all groundwater basins found to be of “high” or “medium” priority to prepare groundwater sustainability plans (GSPs);
- provides for the proposed revisions, by local agencies, to the boundaries of a DWR Bulletin 118 basin, including the establishment of new subbasins;
- provides authority for DWR to adopt regulations to evaluate GSPs and review the GSPs for compliance every 5 years;
- requires DWR to establish BMPs and technical measures for GSAs to develop and implement GSPs; and
- provides regulatory authorities for SWRCB for developing and implementing interim groundwater monitoring programs under certain circumstances (such as lack of compliance with development of GSPs by GSAs).

Within the County, the Sacramento Valley – North American and the Sacramento Valley – South American basins are designated high priority. The Sacramento Valley -Solano and San Joaquin Valley – Cosumnes are designated medium priority (DWR 2021). GSPs for high- and medium-priority basins that are not critically overdrafted are due to DWR by January 31, 2022.

#### **a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?**

As discussed in Impact: Project Effects on Water Quality in the GP EIR, construction activities associated with development of projects allowed under the General Plan would increase soil erosion and sedimentation due to clearing of vegetation, alteration of drainages, and grading. In addition, construction would also involve solvents, paints, concrete, and other materials that have the potential to contact and affect runoff from construction sites. Subsequent development projects would be required to comply with Sacramento County Stormwater Ordinance (Sacramento County Code 15.12). The Land Grading and Erosion Control

Ordinance (Sacramento County Code 16.44) also applies to private construction sites disturbing one or more acres or moving 350 cubic yards or more of earthen material and requires a grading permit. Obtaining a grading permit requires approval of an Erosion and Sediment Control Plan, as well as implementation of BMPs for prevention of erosion and controlling loose soil and sediment to ensure that construction does not result in the movement of unwanted material into waters within or outside the plan area. Projects would also be required to comply with National Pollutant Discharge Elimination System (NPDES) permit requirements, implement a stormwater pollution prevention plan, and perform monitoring of discharges to stormwater systems to ensure compliance with State regulations.

In the long-term, development under the General Plan could result in degradation of water quality related to heavy metals, oils, and grease from vehicles, soap and other chemicals from washing cars, and the use of pesticides and fertilizers. Mitigation Measure HY-2 requires that projects include source and/or treatment control measures on selected new development and redevelopment projects. Developments are also required to treat urban runoff using the BMPs required by the standard defined in the most current edition of the *Stormwater Quality Design Manual for the Sacramento and South Placer Regions*. As further discussed in GP EIR Chapter 5, "Sewer Services," the Clean Water Act requires that water resources be protected from degradation caused by waste discharges and requires that identified beneficial uses be maintained. The Regional Water Board's Water Quality Control Plan for the Central Valley Region identifies the designated beneficial uses of groundwater and surface water bodies and contains water quality objectives and standards established to protect those uses. The objectives of the Water Quality Control Plan for the Central Valley Region are carried out through compliance with the regulations described above. The GP EIR determined that compliance with these regulations and BMPs would reduce water quality impacts in some areas to less than significant under project and cumulative conditions, but there could still be a net increase in polluted runoff in other areas. This impact would be significant and unavoidable.

Implementation of the CAP would not violate water quality standards or waste discharge requirements because the CAP would not result in ground-disturbing activities that would substantially contribute to soil erosion or water quality issues. Implementation of the CAP could support future EV infrastructure (Measure GHG-10), transit access improvements (Measure GHG-14), pedestrian network facilities (Measure GHG-15), bicycle network facilities (Measure GHG-17), improvements to travel connectivity (Measure GHG-22), infill development (Measure GHG-23), improvements to sewage and solid-waste management infrastructure (Measure FLOOD-02), undergrounding utility lines (Measure FLOOD-07), and restoring concrete channels (Measure FLOOD-11) within the County. These activities would be consistent with General Plan Polices CO-24, CO-27, CO-28, CO-29, CO-30, CO-31, and CO-32. These activities would also be required to comply with the Sacramento County Stormwater Ordinance (Sacramento County Code 15.12), Land Grading and Erosion Control Ordinance (Sacramento County Code 16.44), as well as implementation of an Erosion and Sediment Control Plan, BMPs, and NPDES requirements. Therefore, there are (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. The findings of the certified GP EIR related to impacts from conflicts with water quality standards and waste discharge requirements remain valid and no further analysis is required.

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

As discussed in Impact: Interference with Groundwater Recharge in the GP EIR, development within areas identified as high, medium, or low recharge capability would have a substantial effect on groundwater recharge. As further discussed in Impact: Contribute to Groundwater Pumping in Excess of 131,000 acre-feet for the Sacramento North Area Groundwater Basin, the future groundwater demand resulting from General Plan implementation could be accommodated through the existing conjunctive use program, and the General Plan is not expected to contribute to groundwater pumping in excess of 131,000 acre-feet annually for the North Area Groundwater basin. Impact: Contribute to Groundwater Pumping in Excess of 273,000 acre-feet for the Sacramento Central Groundwater Basin Groundwater, states that if increased water supply demand from General Plan implementation was supplied entirely by groundwater, that the 273,000 acre-feet annual sustainable yield would be exceeded. The GP EIR concludes that impacts related to groundwater could be reduced to less than significant with implementation of a new water supply master plan to serve the new growth. Mitigation Measure WS-2 requires that prior to approving any new development in the Jackson and Grant Line East New Growth Areas, a water supply plan shall be approved that demonstrates that the sustainable yield of the Central Groundwater Basin will not be exceeded by the proposed growth. The GP EIR determined that while implementation of this mitigation measure would reduce impacts associated with implementation of the General Plan, impacts that may occur to groundwater. This impact is significant and unavoidable under project and cumulative conditions.

Implementation of the CAP would not decrease water supply because it does not include projects that would substantially increase impervious surfaces or require the use of groundwater. Implementation of the CAP could support future EV infrastructure (Measure GHG-10), transit access improvements (Measure GHG-14), pedestrian network facilities (Measure GHG-15), bicycle network facilities (Measure GHG-17), and solar for county buildings (Measure GOV-BE-02). However, the CAP would also support future infill development (Measure GHG-23), increase water efficiency (Measures GOV-WA-01 through GOV-WA-03, Water-04, Water-05), increase use of recycled water (Measure Water-02), and increase use of pervious surfaces (Measure FLOOD-05). Overall, the CAP could benefit groundwater supplies and is not anticipated to substantially interfere with implementation of GSPs under development pursuant to SGMA. Therefore, there are (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. The findings of the certified GP EIR related to interfering with groundwater recharge remain valid and no further analysis is required.

**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 substantial on- or offsite erosion or siltation;**

See discussion under a) above.

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

As discussed in Impact: Project Effects on Floodplains in the GP EIR, infill development under the General Plan is not expected to increase runoff because there would be no net increase in impervious surfaces. Nevertheless, there may be localized drainage issues and areas of new development that could increase impervious surfaces. However, the County of Sacramento Improvement Standards and Floodplain Management Ordinance requires all infill projects to prepare an analysis of how the proposed grading affects the surrounding area in which they are located, including identification and preservation of floodplain storage, and determination of minimum construction elevations necessary to protect the new development. In addition, all development projects, large or small, are required to submit a site drainage study at a minimum, either at the planning stage or improvement plan stage. Compliance with the County of Sacramento Improvement Standards and Floodplain Management Ordinance addresses the potential for the project to substantially increase the rate or amount of surface runoff in a manner that causes flooding or that exceeds stormwater system capacity. The GP EIR concludes that flooding as a result of increased runoff would be less than significant under project and cumulative conditions.

Implementation of the CAP would not increase the rate or amount of surface runoff because the CAP would not result in development within flood hazard areas, designated floodways, or increase impervious surfaces. Implementation of the CAP could support future EV infrastructure (Measure GHG-10), transit access improvements (Measure GHG-14), pedestrian network facilities (Measure GHG-15), bicycle network facilities (Measure GHG-17), infill development (Measure GHG-23), and solar for County buildings (Measure GOV-BE-02). However, the CAP would evaluate and improve the capacity of stormwater infrastructure (Measure FLOOD-01) and increase use of pervious surfaces (Measure FLOOD-05), which would reduce flooding and runoff in the long-term. These activities would also be required to comply with the County of Sacramento Improvement Standards and Floodplain Management Ordinance. Therefore, there are (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts and cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. The findings of the certified GP EIR related to increasing runoff such that it could result in flooding remain valid and no further analysis is required.

**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**

See discussion under item a) and c) ii) above.

**iv) Impede or redirect flood flows?**

See discussion under item c) ii) above.

**d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?**

As discussed in Impact: Floodplain Effects on the Project in the GP EIR, areas proposed for development under the General Plan overlap with floodplain in some areas. However, compliance with the Sacramento County Floodplain Management Ordinance will ensure that no residence is placed within a flood hazard area, and that people or structures will not be

exposed to a significant risk involving flooding. Mitigation Measure HYD-1 also requires that development within any area identified on the City/County of Sacramento Flood Emergency Evacuation Plan as being inundated by at least 3 feet of water will be prohibited until the American River levee system is certified to a 200-year standard. The GP EIR determined that with implementation of the Sacramento County Floodplain Management Ordinance and Mitigation Measure HYD-1, impacts associated with implementation of the General Plan related to flood hazards would be less than significant.

Implementation of the CAP would support future infrastructure that could be subject to flooding; however, the infrastructure that would be constructed in support of the CAP would not require the use or storage of potentially hazardous materials in quantities that would increase the risk of release of pollutants during project inundation beyond the level of risk associated with the development evaluated in the GP EIR.

Future activities under the CAP would also comply with the Sacramento County Floodplain Management Ordinance and Mitigation Measure HYD-1. Therefore, there are (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. The findings of the certified GP EIR related to impacts from inundation by flood hazard, seiche, and tsunami remain valid and no further analysis is required.

**e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

See discussion under item a) and b) above.

**Mitigation Measures**

GP EIR Mitigation Measures HYD-1, HYD-2, and WS-2 require that projects include source and/or treatment control measures on selected new development and redevelopment projects; that prior to approving any new development in the Jackson and Grant Line East New Growth Areas, a water supply plan shall be approved that demonstrates the sustainable yield; and that development within any areas identified as being inundated by at least 3 feet of water will be prohibited until the American River levee system is certified to a 200-year standard. As applicable, subsequent projects that result from implementation of the CAP would be subject to these mitigation measures. No additional mitigation is required.

**CONCLUSION**

There are no significant impacts that are peculiar to the project. As discussed above, the project would not have any potentially significant impacts or cumulative impacts that were not discussed in the GP EIR. Therefore, the conclusions of the GP EIR remain valid and approval of the project would not require additional environmental review.



## 3.11 LAND USE AND PLANNING

ENVIRONMENTAL ISSUE AREA	Where Impact Was Analyzed in the GP EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in GP EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/ Resolve Impacts?
XI. Land Use and Planning.						
a) Physically divide an established community?	Impact: Division or Disruption of Established Community, p. 3-47	No	No	No	No	NA
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?	Impact: Land Use Plan Compatibility, pp. 3-22 to 3-29 Impact: Land Use Policy Compatibility, pp. 3-35 to 3-44	No	No	No	No	NA

### 3.11.1 Discussion

No substantial change in the environmental setting related to land use and planning has occurred since certification of the GP EIR. The regulatory setting related to land use and planning, described in Chapter 3, “Land Use,” of the GP EIR is largely applicable; however, since certification of the GP EIR, SACOG’s MTP/SCS has been updated, as noted below.

### REGULATORY SETTING

Sacramento Area Council of Government’s 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy

The MTP/SCS for the Sacramento region pro-actively links land use, air quality, and transportation needs. The MTP/SCS is federally required to be updated every four years. The SACOG board adopted the 2020 MTP/SCS and accompanying documents at a special board meeting on November 18, 2019. The updated MTP/SCS continues to be based on the results of the Regional Blueprint and the seven smart growth principles used in that plan, as detailed in the GP EIR.

While the MTP/SCS is required to integrate land use and transportation planning, the region’s cities and counties retain local land use authority over where future development occurs. The MTP/ SCS land use and transportation assumptions are built using local plans and in close coordination with planning and transportation staff around the region. The plan does not mandate any changes to local zoning rules, general plans, or processes for reviewing projects; nor can the plan act as a cap on development in any given jurisdiction.

#### a) Physically divide an established community?

Division of an established community could result from the construction of a physical feature, such as a wall, interstate highway, airport, roadway, or railroad tracks, or the removal of a means of access, such as a local road or bridge that could impair mobility or constrain travel within an existing community, or between a community and outlying areas. The GP EIR

determines that the only elements of General Plan with potential to physically divide an established community upon implementation are new roadways. However, all of the new roadways identified in the General Plan either reflect existing land use or are through sparsely populated areas. For this reason, the GP EIR concludes that the Project does not include any elements that would result in substantial division or disruption of an established community. Impacts would be less than significant.

The GHG reduction and resiliency measures identified in the CAP would not result in development that could physically divide a community. Implementation of the CAP would not divide an established community because the strategic framework would not result in development projects that would alter local land use patterns or obstruct movement through established neighborhoods. Therefore, there are (1) no peculiar impacts, (2) no significant impacts not analyzed in the GP EIR, (3) no significant off-site impacts and cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. The findings of the certified GP EIR pertaining to the physical division of established communities remain valid and no further analysis is required.

**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?**

The GP EIR evaluates both compatibility with land use plans in the unincorporated County, as well as in the incorporated areas of the County and areas adjacent to the County. These evaluations determined that implementation of the General Plan would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. Land-use-related environmental impacts would be less than significant at the project and cumulative level.

Separately, the GP EIR evaluates the potential for the General Plan to result in inconsistency with land use policies, specifically evaluating the consistency of each proposed policy with smart growth principles. GP EIR Appendix A includes a list, by number, of proposed new or modified land use policies and indicates whether the policy is consistent or inconsistent with the smart growth principles. As described in the GP EIR (p. 3-4), "The ultimate purpose of smart growth is sustainable communities, and is a reaction to the recognized health and safety impacts of urban sprawl and vehicle-centric development strategies. Various studies have demonstrated that smart growth development significantly reduces impacts to air quality, water quality, open space/biological resources, and public health."

The General Plan EIR identifies Policies LU-17, LU-87, LU-120, LU-121, and LU-123, which deal with expansion of the Urban Policy Area and amendment of land uses outside the Urban Policy Area, as conflicting with smart growth principles. The remaining 97 proposed new or modified Land Use Policies and Implementation Measures were found to be either neutral or support the smart growth principles. The physical effects of the policy conflicts could result in substantial impacts related to loss of open space and development outside of the urban environment; impacts would be significant at the project and cumulative level.

As explained in the GP EIR (p. 3-1), the General Plan includes four growth management strategies: "buildout of vacant and underutilized infill parcels, buildout of previously master-planned communities, commercial corridor planning and revitalization, and expansion of the

Urban Policy Area (i.e., New Growth Areas).” An overview of potential infill parcels are shown on Figure 4 of the General Plan Land Use Element. The Commercial Corridors are depicted both on Figure 6 in the Land Use Element and on the Land Use Diagram. The CAP would emphasize infill and community corridor revitalization but would not alter the land use designations or policies of the General Plan.

The GP EIR acknowledges that development in existing urban areas can be more challenging because existing communities can be resistant to change, parcels can be irregular, zoning requirements can be difficult to adhere to, and the cost of infrastructure improvements can be high and hard to recuperate when a smaller volume of units are developed (p.3-31). Commercial corridor planning and revitalization, specifically, was determined to be consistent with applicable land use plan, policy, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. The Commercial Corridors are located along arterial roadways that have aging commercial and multiple-family residential buildings that can be renovated to allow a mix of uses (first floor commercial with upper floor residential, for instance), and that have vacant or abandoned properties.

The proposed CAP implements mitigation identified and conceptually analyzed in the GP EIR and would achieve the State GHG reduction targets. The CAP is consistent with the County’s adopted land use plan. The proposed CAP is consistent with GP EIR Mitigation Measure CC-2, part B, which requires that the County adopt a second-phase CAP “that includes economic analysis and detailed programs and performance measures, including timelines and the estimated amount of reduction expected from each measure.” Therefore, the proposed CAP is consistent with the General Plan and CAP implementation would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigation an environmental effect. The project would have (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts and cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. The findings of the certified GP EIR regarding consistency with applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating environmental effects remain valid and no further analysis is required.

## Mitigation Measures

The GP EIR includes several mitigation measures related to new growth areas that proposed modifications to General Plan policies to improve clarity and alignment with smart growth principles. These mitigation measures would not apply to the CAP, which is a policy document that does not propose new development or affect the existing land use policy or diagram in the adopted General Plan. Rather, the CAP supports the elements of the General Plan that align with smart growth principles and encourage infill development. No additional mitigation measures are required.

## CONCLUSION

There are no significant impacts that are peculiar to the project. No new impacts have occurred nor has any new information been found requiring new analysis or verification. The project would not have any potentially significant impacts or cumulative impacts that were not discussed in the GP EIR. Therefore, the conclusions of the GP EIR remain valid and approval of the project would not require additional environmental review.

## 3.12 MINERAL RESOURCES

ENVIRONMENTAL ISSUE AREA	Where Impact Was Analyzed in the GP EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in GP EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/ Resolve Impacts?
XII. Mineral Resources.						
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	Impact: Mineral Resources, pp. 13-27 to 13-28	No	No	No	No	NA
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?	Impact: Mineral Resources, pp. 13-27 to 13-28	No	No	No	No	NA

### 3.12.1 Discussion

No substantial change in the environmental and regulatory settings related to mineral resources, described in the GP EIR Chapter 13, "Geology and Soils," has occurred since certification of the GP EIR.

#### a) **Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**

As discussed in Impact: Mineral Resources in the GP EIR, development that would occur with implementation of the General Plan could be located in areas designated or zoned as a mineral resource zone. Although General Plan policies and regulations are designed to encourage the protection of mineral resources, there is no guarantee that mineral resources would not be lost through General Plan development. The GP EIR concluded that project-level developments are likely to result in obstruction of access to mineral resources within the County. Impacts to mineral resources would be significant and unavoidable at the project and cumulative level.

Implementation of the CAP could support future EV infrastructure (Measure GHG-10), transit access improvements (Measure GHG-14), pedestrian network facilities (Measure GHG-15), bicycle network facilities (Measure GHG-17), improvements to travel connectivity (Measure GHG-22), infill development (Measure GHG-23), and improvements to sewage and solid-waste management infrastructure (Measure FLOOD-02) within the county. These activities would be consistent with General Plan Policies CO-38 and CO-44. In addition, the CAP would not amend, revise, or be inconsistent with any existing regulations related to mineral resources. Therefore, the project would have (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. Therefore, the findings of the certified GP EIR regarding mineral resources remain valid and no further analysis is required.

**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**

See discussion under item a) above.

**Mitigation Measures**

A significant and unavoidable impact related to loss of mineral resources was identified in the GP EIR; however, no mitigation measures are available to reduce this impact to a less-than-significant level.

**CONCLUSION**

There are no significant impacts that are peculiar to the project. No new impacts have occurred nor has any new information been found requiring new analysis or verification. The project would not have any potentially significant impacts or cumulative impacts that were not discussed in the GP EIR. Therefore, the conclusions of the GP EIR remain valid and approval of the project would not require additional environmental review.

### 3.13 NOISE

ENVIRONMENTAL ISSUE AREA	Where Impact Was Analyzed in the GP EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in GP EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/ Resolve Impacts?
XIII. Noise.						
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 in other applicable local, state, or federal standards?	Impact: Proposed Policies pp. 10-15 to 10-17 Impact: Vehicle Noise pp. 10-22 to 10-24	No	No	No	No	NA
b) Generation of excessive groundborne vibration or groundborne noise levels?	NA	No	No	No	No	NA
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?	Impact: Airport Noise Compatibility pp. 10-18 to 10-21	No	No	No	No	NA

#### 3.13.1 Discussion

No substantial changes in the environmental and regulatory settings have occurred related to noise, described in Chapter 10, “Noise,” of the GP EIR.

**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 in other applicable local, state, or federal standards?**

##### Construction Noise

The GP EIR did not analyze the potential generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project with regard to construction noise as a result of implementation of the GP. Although not explicitly addressed in the GP EIR, implementation of the CAP's adaptation and GHG reduction measures would not result in substantial construction noise that would result in a new or more severe impact than would occur due to implementation of the GP EIR. Future discretionary projects would be required to evaluate project-specific impacts under CEQA at the time of application and project-specific mitigation would be required to minimize or avoid construction-related noise impacts to the extent feasible.

CAP measures that would result in the construction of new EV charging stations, bikeway and pedestrian improvements (e.g., bike lanes, bike parking, walkways), installation of on-site solar renewable energy systems, conversion of fossil fuel powered pumps to electric, and green infrastructure projects (e.g., rain gardens, bioswales, stormwater tree trenches, detention

basins) could require minor construction equipment and could result in temporary vehicle trips that generate noise. Because of the scale and nature of the potential improvements, which are generally small and localized, and because the activities would require no use of heavy-duty construction equipment, excessive construction-related noise would not be anticipated. CAP measures that would result in vegetation planting or minor home retrofits (GHG-1, Flood-12, Flood-11, GHG-6, Temp-4) would likely only require hand tools and, therefore, would generate very minimal noise from construction equipment. Temporary noise from worker trips would also likely be minimal because these activities do not require many workers or frequent trips; therefore, these measures would not worsen the noise impact.

CAP measures that would result in improving, updating, bolstering, relocating, or upgrading the County's infrastructure or facilities to proactively prepare for future impacts from climate change such as increased flooding, sea level rise, extreme heat, and wildfire (Flood-2, Flood-6, Temp-1, Water-1, Flood-1, Flood-8, Flood-14, SLR-1) or result in the development of regional stormwater harvest program, underground or overhead utility lines, and installation of underground drainage facilities (Water-2, Flood-7, and Flood-10), would result in the use of heavy construction equipment, construction worker vehicle trips, and truck hauling trips, all activities that could result in an increase in noise. Depending on the type and model of equipment used for construction, typical noise levels for construction equipment such as excavators, graders, scrapers, bulldozers, backhoes, and concrete mixing trucks range from 80 to 95 dB  $L_{max}$  at 50 feet (FTA 2006). Actual exposure levels would depend on the intensity of the construction activity, the distance of sensitive receptors to the noise source, and any intervening structures or topography that might affect noise attenuation. Noise modeling is prepared at the project level and evaluated for consistency with General Plan policies and the County Code. Because of the scale and nature of the infrastructure improvements and related CAP measures, which would likely be distributed in a linear nature across multiple roads and are short in duration, excessive construction-related noise for extended periods of time affecting any one receptor would not be anticipated. Further, construction activity would take place during the daytime hours, consistent with Sacramento County Code, times when people are less susceptible to noise increases. Therefore, because the construction noise would be evaluated through project level analysis, projects would be spread throughout the unincorporated county and short in duration, and because the Sacramento County Code provides exceptions for construction noise, implementation of the CAP would not result in more severe impacts than what was considered in the for the General Plan.

### Operational Noise

As discussed in the GP EIR, increases in operational noise caused by the development of projects allowed under the GP would expose sensitive receptors to a noise level that exceeds existing GP policy. A potentially significant impact was identified because GP Policies NO-9 and NO-15 did not include a maximum allowable noise threshold. Mitigation Measure NO-1 was included to require that Policies NO-9 and NO-15 include a maximum allowable long term noise exposure level for receptors at 75 dB, except in industrial areas. Mitigation Measure NO-1 would reduce the impact of stationary operational noise to less than significant under project and cumulative conditions.

Although the County could theoretically initiate programs to offset vehicle noise (e.g., noise-attenuation features in roadway design or retrofitting private properties with noise attenuation features) in some situations, it is not feasible or reasonable to assume all impacted areas could implement mitigation due to site constraints, funding, and existing levels of exposure.

Therefore, because there is no reasonable or feasible mitigation to ensure complete reduction of the impact from vehicle noise, the GP EIR identified this impact as significant and unavoidable under project and cumulative conditions.

Implementation of the CAP would not result in long-term operational stationary or traffic-related noise sources that exceed the noise sources anticipated in the GP EIR. However, implementation of CAP Measure GHG-24, which implements statewide targets under SB 1838, would result in the County increasing its composting capacity and additional truck hauling trips as composting material is diverted from landfills. The County is required to increase composting capacity under the State law whether or not the CAP is adopted; therefore, implementation of this CAP measure would not worsen the impact from operational noise. CAP measures that would support infill, transit-oriented development, and mixed-use projects (GHG-21 and GHG-23) would not increase vehicle noise because these types of development projects are intended to reduce VMT. Operational noise impacts associated with this development and associated trip generation was already considered under the GP EIR and implementation of these CAP measures would not worsen impacts to vehicle noise, rather they would help to reduce noise impacts. Nonetheless, implementation of the CAP measures discussed above would be required to meet the standards and thresholds in the County's GP and County Code, which would require any project that could exceed noise thresholds to prepare an acoustical analysis and develop appropriate mitigation to reduce any potential long-term exposure to sensitive receptors and temporary ambient noise levels. The CAP does not propose any policy changes to the adopted GP Noise Element and all projects implemented under the CAP would be subject to General Plan Policies NO-9 and NO-15, as amended by GP EIR Mitigation Measure NO-1. As discussed in the GP EIR, there is no reasonable or feasible mitigation to fully offset operational vehicle noise impacts; therefore, this impact remains significant and unavoidable. Implementation of the CAP would not result in increased operational noise because CAP measures would not result in increased traffic noise or stationary noise sources.

## Summary

In summary, implementation of the CAP could result in short-term noise impacts due to the scale and nature of the construction activities, some which could require some use of heavy-duty construction equipment, worker vehicle trips, and truck hauling trips. However, the construction of infrastructure and development associated with implementation of the CAP within the unincorporated County would be consistent with the type and scale of construction considered in the GP EIR and would be exempt from maximum noise level requirements provided associated construction activities do not take place during the specified hours set forth in County Code section 6.68.090(e), limiting the level of noise exposure to surrounding sensitive receptors. Implementation of the CAP would not result in increases from operational noise sources because CAP measures would not result the development of substantial stationary or transportation noise sources. Further, the GP EIR contemplates long-term operational noise sources associated with increased vehicle noise and the CAP would not result in a more severe impact compared to what was evaluated in the GP EIR. Additionally, all projects implemented under the CAP would be required to undergo project-level environmental review to analyze potential noise impacts and identify feasible mitigation to reduce noise impacts. Therefore, the CAP measures would not result in a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance. There are (1) no peculiar impacts, (2) no significant impacts



not analyzed in the GP EIR, (3) no significant off-site impacts and cumulative impacts not discussed in the GP EIR, and (4) no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. The findings of the certified GP EIR regarding ambient noise levels remain valid and no further analysis is required.

**b) Generation of excessive groundborne vibration or groundborne noise levels?**

The proposed CAP is a policy-level document that does not include any site-specific designs, or locations for future improvements. CAP measures that would result in the construction of new EV charging stations, bikeway and pedestrian improvements (e.g., bike lanes, bike parking, walkways), installation of on-site solar renewable energy systems, conversion of fossil fuel powered pumps to electric, and green infrastructure projects (e.g., rain gardens, bioswales, stormwater tree trenches, detention basins (GHG-10, GOV-EC-4, GOV-FL-1, GOV-BE-2, Temp-8) could require the use of minor construction equipment and construction worker vehicle trips. This type of minor construction activity would be localized and would not require heavy duty construction equipment that would typically result in construction related groundborne vibrations. Therefore, implementation of these measures would not likely result construction related groundborne vibration.

CAP measures that would result in improving, updating, bolstering, relocating, or upgrading the County's infrastructure or facilities to proactively prepare for future impacts from climate change such as increased flooding, sea level rise, extreme heat, and wildfire (Flood-2, Flood-6, Temp-1, Water-1, Flood-1, Flood-8, Flood-14, SLR-1) or result in the development of a regional stormwater harvest program, underground or overhead utility lines, and installation of underground drainage facilities (Water-2, Flood-7, and Flood-10), would result in the use of heavy construction equipment and truck hauling trips that could result in an increase in groundborne vibration in the vicinity of the activity. These construction activities could involve bulldozers or other pieces of equipment or activities that would produce substantial groundborne vibration or noise. These types of equipment could generate groundborne vibrations ranging from 0.035 to 0.089 in/sec peak particle velocity at 25 feet and 79 to 87 vibration decibels at 25 feet (FTA 2006) and could expose sensitive receptors to elevated vibration levels. However, vibration levels dissipate rapidly at increasing distance from the vibration source and actual exposure levels would depend on equipment types, haul truck routes, and proximity to and characteristics of sensitive receptors, which cannot be known until a project-level analysis has been completed.

The GP EIR did not analyze potential groundborne vibration or groundborne noise resulting from implementation of the GP. Although not explicitly addressed in the GP EIR, there is nothing unique about the projects that would be implemented under the CAP that would result in a new or more severe impact than would occur due to implementation of the GP EIR. Future discretionary projects would be required to evaluate project-specific impacts under CEQA at the time of application and project-specific mitigation would be required to minimize or avoid vibration impacts to the extent feasible. Therefore, the CAP would not result in worse or more severe vibration impacts and any potential impacts would be mitigated at the project level. There are (1) no peculiar impacts, (2) no significant impacts not analyzed in the GP EIR, (3) no significant off-site impacts and cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. The findings of the certified GP EIR regarding remain valid and no further analysis is required.

**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?**

Implementation of the CAP does not include any site-specific designs or locations for future improvements; therefore, it cannot be determined whether a project would be in an airport compatibility zone at this time. However, as discussed in GP EIR Impact: Airport Noise Compatibility, compliance with the applicable ALUCPs (formerly called CLUPs) would ensure that people residing or working near airports would not be exposed to excessive airport noise; therefore, the GP EIR determined that this impact would be less than significant under project and cumulative conditions.

Likewise, implementation of the CAP would not result in increased exposure to people residing or working in the project area to excessive noise levels because any development would be required to demonstrate consistency with the ALUCPs/CLUPS that include policies and regulations to address airport noise. Under provisions of the California Public Utilities Code, Chapter 4, Article 35, Section 21670.1, Airport Land Use Commission Law, SACOG has been designated the Airport Land Use Commission (ALUC) for Sacramento, Sutter, Yolo, and Yuba counties. State law requires that General Plans be made consistent with adopted ALUCPs/CLUPS. Once consistency is achieved, State law requires that certain types of projects be referred to the ALUC for a determination of their consistency with an adopted ALUCP/CLUP. Such projects include amendments to the 2030 General Plan, or a community plan, and adoption or amendments to zoning ordinances that affect an area within an airport planning boundary as established by an ALUCP/CLUP. The CAP would not result in modifications to the General Plan; any subsequent development would be consistent with the General Plan and established land use designations and zoning. The CAP would not result in a new or more severe impact compared to what was evaluated in the GP EIR. There are (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) significant off-site impacts and cumulative impacts not discussed in the GP EIR, and (4) no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. The findings of the certified GP EIR regarding airport noise remain valid, and no further analysis is required.

#### Mitigation Measures

A potential impact was identified in the GP EIR related to two proposed GP policies not including a maximum allowable threshold. Therefore, Mitigation Measure NO-1 modified two proposed GP policies (NO-9 and NO-15) to include an upper noise ceiling. The CAP would be consistent with these General Plan policies, as modified.

## CONCLUSION

There are no significant impacts that are peculiar to the project. As discussed above, the project would not have any new potentially significant impacts or cumulative impacts, and there is no new information available that was not known and could not have been known at the time the GP EIR was certified as complete. Therefore, the conclusions of the GP EIR remain valid and approval of the project would not require additional environmental review.

## 3.14 POPULATION AND HOUSING

ENVIRONMENTAL ISSUE AREA	Where Impact Was Analyzed in the GP EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in GP EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/ Resolve Impacts?
XIV. Population and Housing.						
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)?	Growth Inducing Impacts, p. 17-16.	No	No	No	No	NA
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	Impact: Displacement of Housing, pp. 3-60 and 3-61.	No	No	No	No	NA

### 3.14.1 Discussion

No substantial change in the regulatory settings related to population and housing, described in the GP EIR Chapter 3, “Land Use,” and Chapter 17, “Growth Inducing Impacts,” has occurred since the certification of the GP EIR.

**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)?**

As discussed under “Growth Inducing Impacts” in Chapter 17 of the GP EIR, projected growth within the County is planned for in the General Plan and analyzed in the GP EIR. The GP EIR concludes that implementation of the General Plan would not directly or indirectly induce a substantial amount of unplanned growth in the area.

Implementation of the CAP would not induce population growth directly or indirectly, because the GHG reduction measures do not propose new housing, nor do they propose changes to policies or regulations related to land use or residential zoning. Although Measure GHG-23 would incentivize infill development, the CAP would not result in development proposals with a population-generating component. The fees collected by the County from developers/builders through implementation of GHG-23 would be used for the purposes of facilitating infill development in urban locations that are already targeted for development. GHG reduction measures that would facilitate the construction of future EV infrastructure (Measure GHG-10), transit access improvements (Measure GHG-14), pedestrian network improvements (Measure GHG-15), traffic calming measures (Measure GHG-16), bicycle network improvements (Measure GHG-17), and roof or ground mounted solar for County buildings (Measure GOV-BE-02), could require a temporary increase in the number of construction workers. These types of projects are small construction projects, which would not require a large construction crew. Furthermore, construction workers would likely be from the Sacramento County area and permanent, substantial relocation of workers would not be required. Therefore, there are (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new

information indicating that an impact would be more severe than discussed in the GP EIR. The findings of the certified GP EIR pertaining to population growth remain valid and no further analysis is required.

**b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

As discussed in Impact: Displacement of Housing, roadway designation upgrades located in urban environments with a constrained right-of-way may result in displacement of housing. Though some housing may not be directly affected, typically if a roadway will encroach into the front yard or garage setback required by the zoning of a parcel, the County will acquire the property. However, the amount of housing that would result from General Plan implementation outweighs the number of homes that would be displaced. The GP EIR concludes that that impacts related to construction of unplanned replacement housing resulting from displacement of people are less than significant under project conditions and less than cumulatively considerable under cumulative conditions.

Implementation of the CAP would not displace people or housing because the GHG reduction measures do not propose new housing, nor do they propose changes to policies or regulations related to land use or residential zoning. Although, Measure GHG-23 would incentivize infill development, the CAP would not result in development proposals with a population-generating component. The fees collected by the County from developers/builders through implementation of GHG-23 would be used for the purposes of facilitating infill development in urban locations that are already targeted for development. Overall, the CAP would reduce GHG emissions generated by using alternatively fueled vehicles, increasing energy efficiency, reducing VMT, encouraging the use of renewable energy, reducing waste generation, and increasing carbon sequestration. Implementation of the GHG reduction measures would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Therefore, there are (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. The findings of the certified GP EIR pertaining to population growth remain valid and no further analysis is required.

**Mitigation Measures**

The GP EIR does not include mitigation regarding population and housing. No additional mitigation measures are required.

**CONCLUSION**

No new circumstances or project changes have occurred nor has any new information been found requiring new analysis or verification. Therefore, the project would have (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. The conclusions of the GP EIR pertaining to population and housing remain valid and no further analysis is required.

## 3.15 PUBLIC SERVICES

ENVIRONMENTAL ISSUE AREA	Where Impact Was Analyzed in the GP EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in GP EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/ Resolve Impacts?
XV. Public Services.						
a)	Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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?	Impact: Increased Demand for Fire Protection and Emergency Services, pp. 4-27 and 4-28	No	No	No	No	NA
Police protection?	Impact: Increased Demand for Law Enforcement Services, p. 4-26	No	No	No	No	NA
Schools?	Impact: Increased Demand for Public School Facilities, pp. 4-22 and 4-23	No	No	No	No	NA
Parks?	Impact: Increased Demand for Parks and Recreation Facilities, pp. 4-30 and 4-31	No	No	No	No	NA
Other Public Facilities?	Impact: Increased Demand for Library Services, pp. 4-24 and 4-25	No	No	No	No	NA

### 3.15.1 Discussion

No substantial change in the settings related to public services, described in GP EIR Chapter 4, "Public Services," has occurred since certification of the GP EIR.

- a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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?

As discussed in Impact: Increased Demand for Fire Protection and Emergency Services of the GP EIR, the increase in demand for fire protection and emergency services anticipated with development of the General Plan will require additional staff and/or fire facilities in order to maintain and provide adequate service levels. However, as stated in the GP EIR, the General Plan policies allow the Board of Supervisors to establish mitigation fees for the purpose of funding adequate fire protection and emergency medical response facilities, provided they find that such fees are critical and necessary to meet the facility funding needs of the fire district. In

addition, building permits would not be issued until the required mitigation fees are provided by the applicant. Therefore, the GP EIR concluded that General Plan implementation would result in a less-than-significant impact under project conditions and be less than cumulatively considerable impact under cumulative conditions.

Implementation of the CAP would not directly affect the provision of fire protection and emergency services, nor contribute to population growth that could result in an increase in demand for fire protection and emergency services. Therefore, implementation of the CAP would not result in facilities that would be substantially different or in areas that are different from those identified in the General Plan such that the construction of these new public services facilities that could have a new, substantial adverse physical impact. Although Measure GHG-23 would incentivize infill development, the CAP would not result in development proposals with a population-generating component. The fees collected by the County from developers/builders through implementation of GHG-23 would be used for the purposes of facilitating infill development in urban locations that are already targeted for development. Further, future projects would be required to comply with General Plan Policies PF-61, PF-62, PF-63, and PF-64 that directs the county to ensure that adequate fire protection and emergency services are provided to meet increased demands resulting from new development. Therefore, the project would have (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. Therefore, the findings of the certified GP EIR pertaining to fire protection and emergency services remain valid and no further analysis is required.

### **Police protection?**

As discussed in Impact: Increased Demand for Law Enforcement of the GP EIR, expansion of the existing facilities or construction of new facilities may be required to serve the additional development. However, as stated in the GP EIR, existing General Plan policies and regulations would ensure that the Sacramento County Sheriff's Department can adequately serve new growth. Therefore, the GP EIR concluded that General Plan implementation would result in a less-than-significant impact under project conditions and be less than cumulatively considerable impact under cumulative conditions.

Implementation of the CAP would not directly affect the provision of law enforcement services, nor contribute to population growth that could result in an increased demand for law enforcement services. Therefore, implementation of the CAP would not result in the construction of new public services facilities that could have substantial adverse physical impacts. Although Measure GHG-23 would incentivize infill development, the CAP would not result in development proposals with a population-generating component. The fees collected by the County from developers/builders through implementation of GHG-23 would be used for the purposes of facilitating infill development in urban locations that are already targeted for development. Further, future projects would be required to comply with GP Policy PF-51, which directs the County to plan and develop law enforcement facilities to keep with the needs and distribution of growth. Therefore, the project would have (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. Therefore, the findings of the certified GP EIR pertaining to law enforcement services remain valid and no further analysis is required.

## **Schools?**

As discussed in Impact: Increased Demand for Public School Facilities of the GP EIR, development within identified New Growth Areas would increase the need for new public elementary, junior high, and high schools. However, as stated in the GP EIR, General Plan policies that require land dedications or reservations for new schools, developer fees under SB 50, and school facilities mitigation under California Government Code Sections 65995(h) and 65996(b), would serve as complete CEQA mitigation for impacts of increased development on the ability of school districts to provide adequate services. Therefore, the GP EIR concluded that General Plan implementation would result in a less-than-significant impact under project conditions and be less than cumulatively considerable impact under cumulative conditions.

Implementation of the CAP would not directly affect the provision of school services, nor contribute to population growth within the local school districts' service areas that could result in an increase in student enrollment in local schools. Therefore, implementation of the CAP would not result in the construction of new schools that could have substantial adverse physical impacts. Although Measure GHG-23 would incentivize infill development, the CAP would not result in development proposals with a population-generating component. The fees collected by the County from developers/builders through implementation of GHG-23 would be used for the purposes of facilitating infill development in urban locations that are already targeted for development. Further, future projects would be required to comply with General Plan Policies PF-27, PF-29, PF-30, and PF-31 that direct the County to require that school siting and design be a key element of a neighborhood planning efforts. Therefore, the project would have (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. Therefore, the findings of the certified GP EIR pertaining to schools remain valid and no further analysis is required.

## **Parks?**

See discussion under item b) in Section 3.16, "Recreation."

## **Other Public Facilities?**

As discussed in Impact: Increased Demand for Library Services of the GP EIR, development within identified New Growth Areas would increase the need for public library services and require construction of new facilities. However, as stated in the GP EIR, existing library facilities would be upgraded to meet the needs of the community through the Sacramento Public Library Authority Facility Master Plan (Facility Master Plan). The Facility Master Plan and the General Plan also identify funding mechanisms for new and expanded library facilities. Therefore, the GP EIR concluded that General Plan implementation would result in a less-than-significant impact under project conditions and be less than cumulatively considerable impact under cumulative conditions.

Implementation of the CAP would not directly affect the provision of library services, nor contribute to population growth that could result in an increased demand for library services. Therefore, implementation of the CAP would not result in the construction of new facilities that could have substantial adverse physical impacts. Although Measure GHG-23 would incentivize infill development, the CAP would not result in development proposals with a population-generating component. The fees collected by the County from developers/builders through

implementation of GHG-23 would be used for the purposes of facilitating infill development in urban locations that are already targeted for development. Further, future projects would be required to comply with General Plan Policy PF-40 that directs the county to require that new and remodeled library facilities meet adopted standards for size, materials and equipment, and programs commensurate with the service population. Therefore, the project would have (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. Therefore, the findings of the certified GP EIR pertaining to library facilities remain valid and no further analysis is required.

#### Mitigation Measures

No mitigation measures were identified in the GP EIR regarding the provision of fire, police, school, and library services. No additional mitigation measures are required.

#### CONCLUSION

No new circumstances or project changes have occurred nor has any new information been found requiring new analysis or verification. Therefore, the project would have (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. The conclusions of the GP EIR pertaining to public services remain valid and no further analysis is required.



## 3.16 RECREATION

ENVIRONMENTAL ISSUE AREA	Where Impact Was Analyzed in the GP EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in GP EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/ Resolve Impacts?
XVI. Recreation.						
a) 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?	Impact: Increased Demand for Parks and Recreation Facilities, pp. 4-30 and 4-31	No	No	No	No	NA
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	Impact: Increased Demand for Parks and Recreation Facilities, pp. 4-30 and 4-31	No	No	No	No	NA

### 3.16.1 Discussion

No substantial change in the regulatory settings related to public services, described in GP EIR Chapter 4, "Public Services," has occurred since certification of the GP EIR.

**a) 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?**

See discussion under item b) below.

**b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?**

As discussed in Impact: Increased Demand for Parks and Recreation Facilities of the GP EIR, development within identified New Growth Areas would require new park facilities to serve new development. However, as stated in the GP EIR, General Plan policies and the Quimby Act require park land dedication and/or in lieu fees in order to develop and maintain park facilities. General Plan policy PF-124 requires new subdivisions to provide sufficient acreage of parks to meet the long-range needs of the community. As development plans are proposed for the new growth areas, parks will be developed as part of those plans. In addition, Mitigation Measure PF-1, requires the County to adopt the Park District Alternative section of the Public Facilities Element, or a similar updated version. Therefore, the GP EIR concluded that General Plan implementation would result in a less-than-significant impact under project conditions and be less than cumulatively considerable impact under cumulative conditions.

Implementation of the CAP would not directly affect the provision of park and recreation facilities, nor contribute to population growth that could increase the use of existing park and recreation facilities resulting in the physical deterioration of such facilities. Although Measure GHG-23 would incentivize infill development, the CAP would not result in development proposals with a population-generating component. The fees collected by the County from

developers/builders through implementation of GHG-23 would be used for the purposes of facilitating infill development in urban locations that are already targeted for development. Further, future projects would be required to comply with General Plan Policies PF-123, PF-124, and PF-125, which direct the County to require that new development provide park and recreation facilities through the provision of land dedication, payment of in-lieu fees, or on-site improvements. Therefore, the project would have (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. Therefore, the findings of the certified GP EIR pertaining to park and recreation facilities remain valid and no further analysis is required.

#### Mitigation Measures

Mitigation Measure PF-1 was referenced in the GP EIR; however, the CAP does not include development proposals that would require the provision of park and recreation facilities. Therefore, this mitigation measure is not applicable to the project. No additional mitigation is required.

#### CONCLUSION

No new circumstances or project changes have occurred nor has any new information been found requiring new analysis or verification. Therefore, the project would have (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts and cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. The conclusions of the GP EIR pertaining to parks and recreation remain valid and no further analysis is required.

## 3.17 TRANSPORTATION

ENVIRONMENTAL ISSUE AREA	Where Impact Was Analyzed in the GP EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in GP EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/ Resolve Impacts?
XVII. Transportation.						
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	Impact: Circulation Policy Compatibility, p. 9-42 Bicycle and Pedestrian Facilities, p. 9-60 Transit, p. 9-61	No	No	No	No	NA
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	Not Analyzed	No	No	No	No	NA
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Impact: Safety, p. 9-60	No	No	No	No	NA
d) Result in inadequate emergency access?	Not Analyzed	No	No	No	No	NA

### 3.17.1 Discussion

The GP EIR, certified in April of 2010, used automobile delay or level of service (LOS) as the primary metric to evaluate CEQA transportation impacts, consistent with industry standards and the County General Plan goals and policies at the time.

On September 27, 2013, Governor Jerry Brown signed SB 743 (Steinberg) into law and started a process to change transportation impact analysis as part of CEQA compliance. SB 743 directed the California Office of Planning and Research (OPR) to revise the State CEQA Guidelines to modify the criteria for determining the significance of transportation impacts to promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses. Section 15064.3 of the State CEQA Guidelines, adopted in December 2018, provides that VMT is the “most appropriate measure of transportation impacts” and mandates analysis of VMT impacts effective July 1, 2020. LOS, or other measures of automobile delay, are no longer considered significant environmental impacts under CEQA. (Pub. Res. Code, § 21009(b)(2).)

As provided in the State CEQA Guidelines, “amendments to the guidelines apply prospectively only,” and CEQA documents must meet the “content requirements in effect when the document was set out for public review,” and “shall not need to be revised to conform to any new content requirements in guideline amendments taking effect before the document is finally approved” (State CEQA Guidelines Section 15007(c)).

The GP EIR was certified long before the amendment to the State CEQA Guidelines adding VMT as the measure of transportation impacts. In addition, information was known about the

effect of VMT on the environment at the time the 2010 GP EIR was prepared; and thus, it could have been evaluated in the transportation chapter of the EIR at that time. As directed by Section 15007, the GP EIR does not need to be revised to conform to the new VMT requirements. In addition, the change in law (replacement of the LOS standard with VMT) does not constitute new significant information under CEQA (PRC 21166 or State CEQA Guidelines Section 15162) as it does not constitute a new impact caused by the changes proposed in the project.

For these reasons, this section provides the environmental and regulatory setting related to VMT, as well as new analysis of the VMT generated by the project. However, because LOS is no longer considered an appropriate metric for analyzing transportation impacts on the environment, analysis and mitigation measures related to LOS are not included in this discussion.

## ENVIRONMENTAL SETTING

The portions of the environmental setting provided on pages 9-1 through 9-13 of Chapter 9, “Transportation and Circulation,” in the certified GP EIR generally remain applicable to this analysis. However, an updated description of the changes to the regional transit service provided by Sacramento Regional Transit District (SacRT) that have occurred subsequent to the approval of the GP EIR are described below.

### Transit

The SacRT operates 30 fixed routes, 19 commuter routes, and 17 seasonal routes, in addition to nine SmaRT Ride on-demand microtransit service zones, Americans with Disabilities Act paratransit service (SacRT GO), Airport Express bus service, UC Davis service (Causeway Connection), and 43 miles of light rail covering a 400 square-mile service area. Buses and light rail run 365 days a year using 97 light rail vehicles, 186 buses powered by compressed natural gas, six zero emission electric buses, 26 shuttle buses powered by compressed natural gas, nine zero emission electric shuttle buses, and 120 Americans with Disabilities Act paratransit vehicles. Buses operate daily from 5:00 a.m. to 11:00 p.m. every 12 to 60 minutes, depending on the route. Light rail trains begin operation at 4:00 a.m. with service every 15 minutes during the day (Monday through Friday) and every 30 minutes in the evening and on weekends. Blue Line and Gold Line trains operate until approximately midnight on weekdays, and 10:30 p.m. on weekends. Green Line trains only operate Monday through Friday (SacRT 2020).

Passenger amenities include 52 light rail stops or stations, 30 bus and light rail transfer centers and 22 park-and-ride lots. SacRT also serves over 3,100 bus stops throughout Sacramento County. SacRT’s entire bus and light rail system is accessible to persons with disabilities.

## REGULATORY SETTING

The regulatory setting for transportation and circulation provided on pages 9-14 through 9-16 of the certified GP EIR generally remain applicable to this analysis. However, an updated description of the adopted changes to the State CEQA Guidelines pursuant to SB 743 that have occurred subsequent to the approval of the GP EIR are described below. Additionally, since certification of the GP EIR, changes to the State, regional, and local regulatory setting have occurred. These changes are described in detail below.

## State

The Transportation Impact Study Guide was prepared by the California Department of Transportation (Caltrans) to provide guidance to Caltrans Districts, lead agencies, tribal governments, developers, and consultants regarding Caltrans review of a land use project or plan's transportation analysis using the VMT metric for evaluating transportation impacts (Caltrans 2020). The Transportation Impact Study Guide replaces the *Guide for the Preparation of Traffic Impact Studies* (Caltrans 2002) and is for use with local land use projects.

### Senate Bill 743

SB 743, passed in 2013, required OPR to develop new CEQA guidelines that address traffic metrics under CEQA. Specifically, SB 743 required OPR to amend the State CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts. Particularly within areas served by transit, those alternative criteria must “promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses” (PRC 21099(b)(1)). Measurements of transportation impacts may include “vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated.” (Ibid.) Once the State CEQA Guidelines are amended to include those alternative criteria, auto delay will no longer be considered a significant impact under CEQA. (Id. At subd. (b)(2).)

OPR published its proposal for a comprehensive update to the CEQA Guidelines in November 2017 that included proposed updates related to analyzing transportation impacts pursuant to SB 743. The most recently published Technical Advisory on Evaluating Transportation Impacts (OPR 2018) provides fundamental guidance on determining significance thresholds and assessing VMT. While the Technical Advisory is most applicable to specific projects or local land use plans, the guidance includes key principles for evaluating transportation impacts. In December 2018, OPR and the State Natural Resources Agency submitted the updated CEQA Guidelines to the Office of Administrative Law for final approval to implement SB 743. The Office of Administrative Law subsequently approved the updated CEQA Guidelines, and local agencies had an opt-in period until July 1, 2020, to implement the updated guidelines. As of July 1, 2020, implementation of Section 15064.3 of the updated CEQA Guidelines apply statewide.

## Local

### Metropolitan Transportation Plan/Sustainable Communities Strategy

SACOG is responsible for the preparation of, and updates to, the MTP/SCS and the corresponding Metropolitan Transportation Improvement Program for the six-county Sacramento region. The MTP/SCS provides a 20-year transportation vision and corresponding list of projects. The Metropolitan Transportation Improvement Program identifies short-term projects (7-year horizon) in more detail. The current (2020) MTP/SCS was adopted by the SACOG board in 2019 and has a horizon year of 2040.

Sacramento County General Plan

The Circulation Element of the Sacramento County General Plan was amended on October 6, 2020, to establish VMT as the threshold of significance for traffic impacts in CEQA analyses. The amendments to the Circulation Element included the following new policy and table:

- CI-5. Land use and transportation planning and development should be cohesive, mutually supportive, and complement the objective of reducing per capita vehicle miles travelled (VMT). The standards shown in Table CI-1 shall be used as thresholds of significance for all projects subject to CEQA. Where the VMT level standards of Table CI-1 are predicted to be exceeded, all feasible mitigation measures shall be included to reduce projected VMT levels.

**Table CI-1  
Significance Thresholds for CEQA Transportation Analysis for  
Development Projects**

Project Type <sup>1</sup>	VMT Significance Criteria
Residential	Project VMT per capita exceeds 85 percent of the regional average VMT per capita
Office/Business Professional	Project VMT per employee exceeds 85 percent of the regional average VMT per employee
Industrial	Project VMT per employee exceeds the regional average VMT per employee
Regional Retail	Net increase in regional VMT
Regional Public Facilities/Services	Net increase in regional VMT
Redevelopment	Projects that result in a decrease to existing regional total VMT are presumed to have a less-than-significant VMT impact; otherwise, apply the relevant threshold based on the proposed land use (treating existing use as vacant)
Mixed Use	Apply the relevant threshold to each land use component individually
Phased	Apply the relevant threshold to each phase independently
Land Development with Roadway Component	For locally-serving roadways, the significance determination is based on the land use component. For regional roadways, apply thresholds of significance for transportation projects.

<sup>1</sup> As defined in the Sacramento County Transportation Analysis Guidelines, Appendix A

Sacramento County Department of Transportation Analysis Guidelines

The Sacramento County Department of Transportation’s (SacDOT’s) *Transportation Analysis Guidelines* were adopted by the County of Sacramento Board of Supervisors in September of 2020; thus, establishing County-specific VMT thresholds for analysis of transportation impacts under CEQA. These guidelines provide guidance for the preparation of transportation analysis

for land use and transportation projects as part of the environmental review process to comply with CEQA and the changes made as a result of SB 743.

The Transportation Analysis Guidelines recommend that all projects evaluate and disclose transportation-related environmental impacts using VMT as the primary metric, as required by CEQA. Additionally, methodologies are provided to evaluate automobile delay and LOS outside of the CEQA process.

### County of Sacramento Bicycle Master Plan

An update to the *Bicycle Master Plan* was adopted in April 2011 and amended in January 2012. The *Bicycle Master Plan* is intended to guide and influence bikeway policies, programs, and standards to make bicycling in Sacramento County more safe, comfortable, convenient, and enjoyable for all bicyclists (Sacramento County 2011b). The goal of the Bicycle Master Plan is to increase the number of people who bicycle in the County for a variety of purposes through physical improvements to the bicycle network, as well as the implementation of key programs.

#### **a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?**

The GP EIR determined that the General Plan would increase the provision of appropriate bicycle and pedestrian facilities integrated throughout the unincorporated County, and particularly in new growth areas; thus, resulting in a mode shift. Therefore, this impact was determined to be less than significant. Finally, the GP EIR determined that despite the intent of the General Plan to provide an adequate level of transit services in accordance with smart growth principles, the provision of adequate transit services in a timely fashion could not be ensured due to future funding uncertainties. Additional General Plan policies directly and indirectly related to the provision of adequate transit were included in the GP EIR; however, even with the implementation of mitigation, this impact was determined to be significant and unavoidable under project and cumulative conditions.

Implementation of the CAP would not result in long-term operational increases in vehicular traffic along roadways in the unincorporated County. The CAP includes specific GHG reduction measures focused on reducing emissions-generating activities by promoting public transit, and alternative modes of transportation such as biking and walking, carpooling, and transit-oriented development; thus, resulting in fewer vehicle trips on roadways and highways and higher numbers of transit riders, bicyclists, and pedestrians. For example, GHG reduction measures contained within the CAP would support the implementation of the Sacramento Area Plug-In Electric Vehicle Collaborative's Electric Vehicle Readiness and Infrastructure Plan (Measure GHG-10); the revision of parking standards for new non-residential development (Measure GHG-13); improvements to transit access (Measure GHG-14); pedestrian network and related facilities (Measure GHG-15); and bicycle network and facility improvements (Measure GHG-17); implementation of traffic calming strategies (Measure GHG-16); increased safety for children walking and biking to school (Measure GHG-20); and the connection of key destinations for all modes of travel (Measure GHG-22). Internal County measures include reducing VMT through an employee transportation demand management program (Measure GOV-EC-01), increasing participation in a transit subsidy program for county employees (Measure GOV-EC-02), and encouraging staff to utilize carpooling and alternative forms of transportation for work related activities (Measure GOV-EC-03, Measure GOV-EC-04, and

Measure GOV-EC-05). These activities would be consistent with General Plan Policies CI-5, CI-19 through CI-31, CI-32 through CI-38, CI-40, CI-41, and CI-43 of the General Plan.

As described above, subsequent projects under the CAP would not conflict with the General Plan. Additionally, subsequent development projects under the CAP would be subject to all applicable County guidelines, standards, and specifications related to transit, bicycle, or pedestrian facilities. Therefore, the CAP would not result in a new or greater contribution to cumulative effects related to transit, bicycle, and pedestrian facilities beyond what was identified in the GP EIR. Thus, the Project's contribution to substantial effects related to transit, bicycle, and pedestrian facilities would be less than cumulatively considerable.

Therefore, there are (1) no peculiar impacts, (2) no significant impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information that was not known at the time the 2010 GP EIR was certified. The findings of the certified GP EIR regarding impacts which would conflict with any applicable transportation plans, ordinances, or policies remain valid and no further analysis is required.

**b) Conflict or be inconsistent with CEQA Guidelines section 15064.3(b), which pertains to vehicle miles travelled?**

The GP EIR was completed in 2010, before Public Resources Code Section 21099 and CCR Section 15064.3 were required under CEQA; and thus, no significance conclusion related to VMT was provided in the GP EIR.

Implementation of GHG reduction measures associated with the CAP would not induce substantial population or employment growth in the unincorporated County; and thus, would not generate additional VMT over the long-term. Generally, the types of projects associated with implementation of GHG reduction measures that would require construction activities would be relatively small in nature (e.g., improvements to pedestrian facilities [Measure GHG-15], implementation of traffic calming measures [Measure GHG-16], construction of new bicycle infrastructure [Measure GHG-17]); and would not require large construction crews. This would result in a small number of temporary and intermittent construction worker trips to and from future project sites. Additionally, VMT of construction workers is typically not newly generated; instead, it is redistributed throughout the regional roadway network based on the different work sites to which workers travel each day. Therefore, construction workers would not be generating new VMT, only redistributing it. This redistribution would be nominal and temporary. Consequently, it is assumed that the impact to VMT would be less than significant during the construction of any infrastructure projects under the CAP.

Moreover, the proposed CAP includes the following GHG reduction measures specifically focused on reducing GHG emission through the promotion and implementation of single occupancy vehicle trip reduction strategies, which would meaningfully reduce the VMT in the County:

- Measure GHG-11: Reduce Emissions From New Residential and Office/Business Professional Development Vehicle Miles Traveled
- Measure GHG-12: Transportation System Management Plan For Non-Residential Projects
- Measure GHG-13: Revise Parking Standards for Non-Residential Development



- Measure GHG-14: Improved Transit Access
- Measure GHG-15: Improved Pedestrian Network and Facilities
- Measure GHG-16: Traffic Calming Measures
- Measure GHG-17: Improved Bicycle Network and Facilities
- Measure GHG-20 Safe Routes to School
- Measure GHG-23: Incentivize Infill Development
- Measure GOV-EC-01: Employee Transportation Program
- Measure GOV-EC-02: Transit Subsidy Program
- Measure GOV-EC-03: Employee Shuttle System

The discussion of VMT impacts detailed above is inherently a cumulative impact analysis as it compares the CAP to General Plan VMT standards associated with buildout of the County. For the reasons detailed above, the CAP would not result in a substantial increase in VMT and would implement measures to reduce single-occupant automobile travel.

In summary, the CAP would not result in a substantial increase in VMT and would implement measures to reduce single-occupant automobile travel. Therefore, no new significant impacts or substantially more severe impacts would occur. Thus, there are (1) no peculiar impacts, (2) no significant impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information that was not known at the time the 2010 GP EIR was certified. The findings of the certified GP EIR remain valid and no further analysis is required.

**c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

The GP EIR determined that transportation hazards would not substantially increase because the Circulation Element adopted as part of the General Plan would incorporate policies related to transportation facility planning, design, and implementation in accordance with accepted design standards and guidelines. Therefore, this impact was determined to be less than significant under project and cumulative conditions.

Implementation of GHG reduction measures that would result in ground disturbing activities, including grading and excavation, could result in alterations of public roadways, such as improvements to pedestrian facilities (Measure GHG-15), the implementation of traffic calming measures (Measure GHG-16), construction of new bicycle infrastructure (Measure GHG-17), installation of EV charging infrastructure (Measure GHG-10), and installation of electric irrigation pumps (Measure GHG-25). Additionally, all future roadway improvements would be required to comply with the County of Sacramento Improvement Standards, which requires streets to be designed to current County standards.

Construction activities related to CAP implementation and the associated potential infrastructure improvements detailed above could result in temporary road closures and result in a substantial increase in transportation hazards. However, any construction work within the road right of way which modifies vehicular, bicycle, and/or pedestrian traffic patterns would require a traffic control plan (TCP) and/or Detour Plan consistent with SacDOT requirements. Any such TCP and Detour Plans would be reviewed, managed, and approved by the SacDOT Right of Way Management Section; thus, ensuring the safe and efficient movement of traffic through construction work zones. Additionally, Sacramento County has developed TCP templates that conform to the current California Manual of Traffic Control Devices for use. If construction conditions include effects not addressed in the TCP templates, SacDOT review and approval of TCP's is required prior to construction.

Therefore, there are (1) no peculiar impacts, (2) significant impacts not analyzed in the GP EIR, or (3) significant off-site impacts and cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information that was not known at the time the 2010 GP EIR was certified. The findings of the certified GP EIR related to substantially increasing hazards due to geometric design or incompatible uses remain valid and no further analysis is required.

**d) Result in inadequate emergency access?**

The GP EIR did not specifically address the provision of adequate emergency access; and thus, no significance conclusion related to VMT was provided in the GP EIR. However, all future transportation infrastructure improvements associated with the General Plan are subject to review by the County and responsible emergency service agencies; thus, ensuring that any such projects would be designed to meet all applicable emergency access and design standards.

The GHG reduction measures would not result in new development or land uses that would require installation of emergency access routes. However, construction of various pedestrian facilities (Measure GHG-15), traffic calming strategies (Measure GHG-16), and bicycle infrastructure (Measure GHG-17) could permanently alter existing roadways that serve as emergency access routes. However, all future transportation infrastructure improvements would be required to comply with the California Fire Code, adopted by reference in Sacramento County Code Chapter 17.04, Sections 17.04.005 through 17.04.070, which requires the width of an unobstructed roadway to measure no less than 24 feet in order to provide adequate access for fire and emergency responders. Because all future transportation infrastructure improvements associated with the CAP would be subject to review by the County and responsible emergency service agencies, any such projects would be designed to meet all applicable emergency access and design standards.

Therefore, there are (1) no peculiar impacts, (2) no significant impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information that was not known at the time the 2010 GP EIR was certified. The findings of the certified GP EIR regarding impacts to emergency access remain valid and no further analysis is required.

## Mitigation Measures

As described above, the CAP would not conflict with a program, plan, ordinance or policy addressing transit facilities, including the General Plan. Mitigation Measure TC-6 of the GP EIR added policies to the General Plan Update to mitigate the significant impact to transit facilities and service. Therefore, through compliance with the General Plan and associated transit policies; the CAP would implement Mitigation Measure TC-6. No additional mitigation is required.

## CONCLUSION

There are no significant impacts that are peculiar to the project. As discussed above, the project would not have any potentially significant impacts or cumulative impacts that were not discussed in the GP EIR. Therefore, the conclusions of the GP EIR remain valid and approval of the project would not require additional environmental review.

## 3.18 TRIBAL CULTURAL RESOURCES

ENVIRONMENTAL ISSUE AREA	Where Impact Was Analyzed in the GP EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in GP EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/ Resolve Impacts?
<b>XVIII. Tribal Cultural Resources.</b>						
Has a California Native American Tribe requested consultation in accordance with Public Resources Code section 21080.3.1(b)?						
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:						
a) 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)?	Not Analyzed	No	NA	NA	No	NA
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	Not Analyzed	No	NA	NA	No	NA

### 3.18.1 Discussion

AB 52, signed by the California Governor in September of 2014, established a new class of resources under CEQA: “tribal cultural resources.” It requires that lead agencies undertaking CEQA review must, upon written request of a California Native American tribe, begin consultation once the lead agency determines that the application for the project is complete, prior to the issuance of a Notice of Preparation of an EIR or notice of intent to adopt a negative declaration or mitigated negative declaration. This requirement took effect on July 1, 2015. The Notice of Preparation for the GP EIR was published on August 13, 2007, prior to the effective date of this requirement. AB 52 (Chapter 532, Statutes of 2014) established a formal consultation process for California Native American tribes as part of CEQA and equates significant impacts on tribal cultural resources with significant environmental impacts (PRC Section 21084.2). AB 52 consultation requirements went into effect on July 1, 2015, for all projects that had not already published a Notice of Intent to Adopt a Negative Declaration or Mitigated Negative Declaration, or published a Notice of Preparation of an EIR prior to that date (Section 11 [c]). Specifically, AB 52 requires that “prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project, the lead agency shall begin consultation” (21808.3.1 [a]), and that “the lead agency may certify an environmental impact report or adopt a mitigated negative declaration for a project with a significant impact on an identified tribal cultural resource only if” consultation is formally concluded (21082.3[d]).

However, in the case of the current project, the lead agency has prepared this Addendum to the previously adopted 2010 GP EIR, in accordance with Section 15164 of the State CEQA Guidelines. An Addendum was determined to be the most appropriate document because none of the conditions described in Section 15162, calling for preparation of a subsequent EIR, have occurred. The Addendum addresses minor technical changes or additions and confirms that the project is consistent with what was previously analyzed under the 2010 GP EIR. As such, the Addendum will not result in an additional certification; therefore, the AB 52 procedures specified in PRC Sections 21080.3. 1(d) and 21080.3.2 do not apply; no tribal consultation under AB 52 is required and no identification of tribal cultural resources can occur.

### 3.19 UTILITIES AND SERVICE SYSTEMS

ENVIRONMENTAL ISSUE AREA	Where Impact Was Analyzed in the GP EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in GP EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/ Resolve Impacts?
XIX.	<b>Utilities and Service Systems.</b>					
a)	Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	No	No	No	No	NA
b)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	No	No	No	No	NA.
c)	Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments?	No	No	No	No	NA
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?	No	No	No	No	NA.

ENVIRONMENTAL ISSUE AREA	Where Impact Was Analyzed in the GP EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in GP EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/ Resolve Impacts?
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Impact: Land Use and Development Effects on Solid Waste Disposal Demand, pp 4-21 and 4-22	No	No	No	No	NA

### 3.19.1 Discussion

No substantial change in the settings related to utilities and services systems, described in GP EIR Chapter 4, “Public Services,” Chapter 5, “Sewer Services,” Chapter 6, “Water Supply,” and Chapter 7, “Hydrology and Water Quality,” has occurred since certification of the GP EIR.

**a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?**

As discussed in Impact: Increase in Water Demand that Cannot be Met by Water Purveyor’s Existing or Future Projected Supplies or Require New Water Treatment Facilities and Pipelines that could cause Construction Environmental Effects in the GP EIR, all 28 water purveyors that serve Sacramento County are likely to need additional conveyance infrastructure to serve new development. The GP EIR states that the impacts of construction of these pipelines, wells, and other structures are potentially significant. Implementation of General Plan Policy WS-1 would require the County to approve projects and issue buildings permits only if there are adequate water supplies to serve the project. The GP EIR concludes that impacts would be significant and unavoidable under project conditions and cumulatively considerable impact under cumulative conditions.

As discussed in Chapter 5, “Sewer Services,” of the GP EIR, population growth under the General Plan would increase existing flows to 193.9 million gallons per day (mgd), which exceeds permitted flows of 181 mgd. Local and trunk sewer lines may not have the capacity to convey the additional flow to the interceptors. To accommodate these land uses, sewers lines would need to be enlarged or additional lines constructed along with other facilities, such as pumping stations. However, as stated in the GP EIR, Sacramento Area Sewer District and Sacramento Regional County Sanitation District have planned for these facilities. No development impacts beyond those already discussed in the GP EIR are expected due to construction of the facilities. Financing plans would be required as part of the New Growth Areas to ensure that funding is available to construct the improvements; existing General Plan policy requires the master planning and financing of infrastructure, including sewer. Therefore, the GP EIR concluded that General Plan implementation would result in a less-than-significant impact under project conditions. However, cumulative impacts would be significant and unavoidable due to indirect environmental effects identified in the three sewerage master plans associated with construction related impacts to air quality, water quality, traffic control, circulation, aesthetics, soils, cultural resources, hazardous materials, and potential impacts to biological resources.

As stated in Impact: Project Effects on Floodplains, development under the General Plan would increase the amount or velocity of runoff that may drain into the stormwater system. The County requires that projects include source and/or treatment control measures on selected new development and redevelopment projects. Treatment controls such as vegetated swales and water quality detention basins would slow water down and allow sediments and pollutants to settle out prior to discharge to receiving waters. The use of “low impact development” techniques would reduce the imperviousness of these sites, which would reduce the volume of runoff and could reduce the size and cost of the stormwater quality treatment required. Examples of low impact development techniques include pervious pavement and bioretention facilities. Future master planning proposals within the growth areas would be required to prepare a Drainage Master Plan, pursuant to General Plan Policy SA-5. The GP EIR concluded that compliance with County Ordinances, Improvement Standards, and General Plan Policy SA-5 would ensure that the General Plan would not substantially increase the rate or amount of surface runoff in a manner that causes flooding or that exceeds stormwater system capacity. General Plan implementation would result in a less-than-significant impact under project conditions and be less than cumulatively considerable impact under cumulative conditions.

As discussed in Impact: Increased Demand for Energy Facilities and Services in the GP EIR, new growth areas would require additional energy production and distribution facilities (such as transmission corridors) to provide delivery of electricity, natural gas, and telecommunication services to new development. However, Community Plans must contain an Energy Facility Siting Element, indicating the location of existing and planned energy and gas facilities. Developing neighborhoods must prepare a Public Facility Financing Plan that includes the cost of the installation of new and existing subtransmission lines underground. These new facilities would be constructed within the New Growth Areas, and as such would not result in additional environmental impacts that would not already be caused by General Plan implementation, as discussed, and mitigated (as appropriate) in the GP EIR. The GP EIR concluded that General Plan implementation would result in a less-than-significant impact under project conditions and be less than cumulatively considerable impact under cumulative conditions.

The CAP includes measures, particularly in the climate adaptation strategy, that could result in the relocation or upgrade of existing critical infrastructure identified as vulnerable to extreme heat, flooding, or other adverse conditions as a result of climate change. These types of modifications would be within the scope of the improvements evaluated in the GP EIR. Implementation of the CAP would not involve development of residential communities or other similar types of development or induce population growth in an area that would increase demand for expanded utility services. Although Measure GHG-23 would incentivize infill development, the CAP would not result in development proposals with a population-generating component. The fees collected by the County from developers/builders through implementation of Measure GHG-23 would be used for the purposes of facilitating infill development in urban locations that are already targeted for development. Further, because the CAP includes measures intended to reduce water use (WATER-01 to WATER-06), power consumption, and demand for natural gas (GHG-06, GOV-BE-04) the CAP may reduce future demand for new or expanded utility infrastructure. Therefore, there are (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. The findings of the certified GP EIR regarding the expansion or construction of water infrastructure, wastewater



treatment facilities, storm drainage facilities, electric power, natural gas, or telecommunications facilities would remain valid and no further analysis is required.

**b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?**

As discussed in Impact: Increase in Water Demand that Cannot be Met by Water Purveyor's Existing or Future Projected Supplies or Require New Water Treatment Facilities and Pipelines that could cause Construction Environmental Effects in the GP EIR, population growth under the General Plan would increase water demand. As stated in the GP EIR, in most cases there is sufficient available supply to meet additional demand; however, the following purveyors will need to obtain additional supply: California American Water Company Northern Division, Florin County Water District, and Sacramento County Water Agency Zone 40. Implementation of General Plan Policy WS-1 would require the County to approve projects and issue buildings permits only if there are adequate water supplies to serve the project. The GP EIR concluded that impacts would be significant and unavoidable under project conditions and cumulatively considerable under cumulative conditions.

Implementation of the CAP would not involve development of residential communities or other similar types of development or induce population growth in an area that would increase demand for water. A minimal amount of water would be required for dust control during construction and grading activities and would not contribute to an exceedance of available water supplies. Although Measure GHG-23 would incentivize infill development, the CAP would not result in development proposals with a population-generating component. The fees collected by the County from developers/builders through implementation of Measure GHG-23 would be used for the purposes of facilitating infill development in urban locations that are already targeted for development. In addition, Measures GOV-WA-01, GOV-WA-02, and GOV-WA-03 would improve water efficiency by formally adopting a water reduction target for new and existing buildings and replacing water-wasting equipment. Therefore, there are (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. The findings of the certified GP EIR regarding the provision of sufficient water supplies would remain valid and no further analysis is required.

**c) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments?**

As discussed in Chapter 5, "Sewer Services, of the GP EIR, population growth under the General Plan would increase existing flows to 193.9 mgd which would exceed permitted flows of 181 mgd. According to the analysis in the GP EIR, the Sacramento Area Sewer District 2020 Master Plan proposes to expand treatment capacity from 181 mgd average dry weather flow to 218 mgd. Implementation of General Plan Policy SE-1 would require new development projects to extend or modify trunk or interceptor sewer systems consistent with sewer facility plans and participate in established funding mechanisms. In addition, prior to approval of a Commercial Corridor re-development plan, preparation of a sewer study and financing mechanism would be required. General Plan Policy SE-2 states that new development that would generate wastewater for treatment at the Sacramento Regional Wastewater Treatment Plant (SRWTP) would not be approved if treatment capacity at the SRWTP is not sufficient to allow treatment and disposal of wastewater in compliance with the SRWTP's NPDES Permit.

The GP EIR concludes that if SRCSD expands the permitted capacity to 218 mgd, General Plan implementation would result in a less-than-significant impact under project conditions. However, cumulative impacts would be significant and unavoidable due to indirect environmental effects identified in the three sewerage master plans associated with construction related impacts to air quality, water quality, traffic control, circulation, aesthetics, soils, cultural resources, hazardous materials, and potential impacts to biological resources.

Implementation of the CAP would not exceed existing wastewater capacity because implementation of GHG reduction measures would not involve development of residential communities or other similar types of development or induce population growth in an area that would increase demand for wastewater treatment. Although, Measure GHG-23 would incentivize infill development, the CAP would not result in development proposals with a population-generating component. The fees collected by the County from developers/builders through implementation of Measure GHG-23 would be used for the purposes of facilitating infill development in urban locations that are already targeted for development. Further, GHG reduction measures would not involve the construction of restroom facilities. Depending on the duration and location of future projects, the project proponent may supply portable restrooms for use by work crews. Portable restrooms are self-contained and would be cleaned periodically, and the waste would be hauled off-site to a wastewater treatment facility for disposal. This service is typically provided by an independent contractor permitted to handle, haul, and dispose of sanitary sewage. Pursuant to 40 Code of Federal Regulations Part 403.5, hauled waste must be disposed of at a designated publicly owned treatment facility. Typically, publicly owned treatment facilities are responsible for implementing permit programs for hauled waste and ensure that adequate treatment capacity exists. Therefore, the project would have (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. Therefore, the findings of the certified GP EIR pertaining to wastewater remain valid and no further analysis is required.

**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?**

As discussed in Impact: Land Use and Development Effects on Solid Waste Disposal Demand of the GP EIR, development within identified New Growth Areas would increase solid waste generation. However, as stated in the GP EIR, the County maintains a disposal rate of 5.9 pounds per person per day which is lower than the SB 610 disposal maximum of 7.7 pounds per person per day. The County expects to continue the waste diversion efforts through implementation of General Plan Policy PF-19, the Sacramento Regional Solid Waste Authority and County recycling program, and through the County Integrated Waste Management Plan. With continued recycling efforts, the Kiefer Landfill would meet solid waste demands until 2035 or later. Implementation of General Plan Policy PF-21 and Implementation Measure A would ensure that adequate land is allocated adjacent to the existing county landfill to support construction of new transfer stations if needed. Therefore, the GP EIR concluded that General Plan implementation would result in a less-than-significant impact under project conditions and be less than cumulatively considerable impact under cumulative conditions.

Implementation of the CAP would not exceed existing solid waste capacity because implementation of GHG reduction measures would not result in development projects that would directly contribute to population growth. Although Measure GHG-23 would incentivize infill development, the CAP would not result in development proposals with a population-generating component. The fees collected by the County from developers/builders through implementation of Measure GHG-23 would be used for the purposes of facilitating infill development in urban locations that are already targeted for development. Further, Measure GHG-24 would direct the County to divert 75 percent of organic waste deposited into landfills from both commercial and residential sources by 2045. Overall, implementation of Measure GHG-24 would reduce the amount of solid waste transported to the Kiefer Landfill. In addition, the County's waste diversion goals would continue to be consistent with AB 939, which requires 50 percent waste diversion, and AB 341 which requires a Statewide 75 percent waste diversion for businesses. Therefore, the project would have (1) no peculiar impacts, (2) no impacts not analyzed in the GP EIR, (3) no significant off-site impacts or cumulative impacts not discussed in the GP EIR, and (4) there is no substantial new information indicating that an impact would be more severe than discussed in the GP EIR. Therefore, the findings of the certified GP EIR pertaining to solid waste remain valid and no further analysis is required.

**e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

See discussion under item d) above.

**Mitigation Measures**

Mitigation Measures PF-19, PF-21, SA-5, SE-1, SE-2, and WS-1 were referenced in the GP EIR; however, the CAP does not include development proposals that would require the utilities and service systems. Therefore, these mitigation measures are not applicable to the project. No additional mitigation is required.

**CONCLUSION**

There are no significant impacts that are peculiar to the project. As discussed above, the project would not have any potentially significant impacts or cumulative impacts that were not discussed in the GP EIR. Therefore, the conclusions of the GP EIR remain valid and approval of the project would not require additional environmental review.

## 3.20 WILDFIRE

ENVIRONMENTAL ISSUE AREA	Where Impact Was Analyzed in the GP EIR.	Any Peculiar Impact?	Any Impact Not Analyzed as Significant Effect in GP EIR?	Any Significant Off-Site or Cumulative Impact Not Analyzed?	Any Adverse Impact More Severe Based on Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/ Resolve Impacts?
XX. Wildfire.						
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:						
	Impact:	No	No	No	No	NA
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	Roadways Level of Service – Proposed Project, pp. 9-44 to 9-57					
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?	Not Addressed	No	No	No	No	Yes.
c) Require the installation 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 to the environment?	Not Addressed	No	No	No	No	Yes
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?	Not Addressed	No	No	No	No	Yes

### 3.20.1 Discussion

This resource section reflects the updated State CEQA Guidelines that became effective on December 28, 2018, after the GP EIR was and certified. As provided in CEQA Guidelines Section 15007, “amendments to the guidelines apply prospectively only.” CEQA documents must meet the “content requirements in effect when the document was set out for public review,” and “shall not need to be revised to conform to any new content requirements in guideline amendments taking effect before the document is finally approved.”

As directed by Section 15007, the GP EIR does not need to be revised to conform to the new wildfire requirements. Information was known about the effect of wildfire on the environment at the time the 2010 GP EIR was prepared; and, thus, it could have been evaluated. In addition, the change in the State CEQA Guidelines does not constitute new significant information under CEQA (State CEQA Guidelines 15162), as it does not constitute a new impact caused by the changes proposed in the project.

The following thresholds are specific to areas within or near State Responsibility Areas (SRAs) or Local Responsibility Areas (LRAs) classified as Very High Fire Hazard Severity Zones. The SRA is the area where the State is financially responsible for the prevention and suppression of wildfires. Alternatively, the LRA is the area in which local governments or fire districts, rather than the State, are responsible for fire prevention and suppression. The California Department of Forestry and Fire Protection (CAL FIRE) creates Fire Hazard Severity Zone maps for areas within the SRA and prepares recommended Fire Hazard Severity Zone maps for areas within the LRA. Hazard ratings range from Moderate to Very High and are based on the physical conditions that contribute to the likelihood that an area will burn over a 30- to 50-year period (Sacramento County 2017b).

In Sacramento County, a portion of the SRA is located within the Cosumnes and Southeast communities, roughly east of Grant Line Road and Clay Station Road and is served by Metro Fire, Herald Fire Protection District, and the Wilton Fire Protection District. A majority of this area is outside of the Urban Services Boundary (USB) and is designated in the Land Use Diagram as General Agricultural. The USB is a permanent growth boundary which concentrates growth and protects natural resources (Sacramento County 2017b).

Areas outside of the USB are subject to protection from development by many policies within the Land Use Element of the General Plan, including LU-2, LU-76, LU-77, LU-84, and LU-127. Most of the SRA outside of the USB is defined as a Moderate Fire Hazard Severity Zone. Similarly, most of the LRA within the County is either defined as Unzoned or as a Moderate Fire Hazard Severity Zone. However, a small portion of both the SRA and LRA within the Southeast community of the County contains a Very High Fire Hazard Severity Zone due to the presence of a dense eucalyptus grove. The Very High Fire Hazard Severity Zone is within an existing Agricultural Residential community outside of the USB. Therefore, very limited future residential development is anticipated occur there. This area is served by the Herald Fire Protection District, which reviews all planning applications for compliance with current fire standards (Sacramento County 2017b).

California State law also requires that counties address the risk of fire for land classified as SRA and land classified as Very High Fire Hazard Severity Zone within their safety elements (Government Code Section 65302(g)(3)). Wildfire hazard is addressed in the Background Report for the Safety Element (Sacramento County 2017b:48-51) and policies of the Safety Element.

**a) Substantially impair an adopted emergency response plan or emergency evacuation plan?**

See discussion under item f) in Section 3.9, "Hazards and Hazardous Materials." In addition, Measure FIRE-04 in the proposed CAP would improve emergency preparedness in wildfire-prone areas compared to existing conditions through a suite of implementation actions that include: identifying strategies to ensure capacity and resilience of escape routes, improving outreach, and establishing reliable wildfire monitoring systems. This is anticipated to increase the efficacy of evacuation procedures, reliability of emergency supplies, and distribution of wildfire risk information.

**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?**

The GP EIR does not specifically evaluate potential to expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to exacerbation of wildfire risks. As discussed above, while portions of the Cosumnes and Southeast communities are within the SRA and designated as Very High Fire Hazard Severity Zone, these areas are unlikely to experience development under the current General Plan. Moreover, where elements of the proposed CAP might be implemented in these areas of recognized fire hazard, they would not exacerbate wildfire risk. The CAP would not change the key conditions in the unincorporated County that increase an area's susceptibility to fire hazards (i.e., slope, vegetation type and condition, and atmospheric conditions), nor would the CAP change development patterns established in the General Plan Land Use Diagram.

Implementation of the CAP could support future infrastructure projects; however, it would not include any habitable structures. EV charging stations and PV solar facilities would likely be installed in new and existing developments, and roadway improvements would occur along already paved roadways. The CAP programs would not substantially increase the risk of wildfire in the County in a manner that would expose residents to uncontrolled spread of a wildfire or related pollution. General Plan Policy SA-23 of the General Plan Safety Element also requires that all new development meet the local fire district standards. Further, the CAP includes measures (FIRE-01 to FIRE-06) intended to prepare for increased risk of wildfire associated with climate change and several other measures that may provide the co-benefit of reducing wildfire risk (e.g., TEMP-04).

Under Measure FIRE-01, the County would work with CAL FIRE, Metro Fire, and any other fire department operating within the boundaries of the County to map and identify locations within the County that are newly at risk, or at higher risk, for wildfire hazards as a result of climate change and its impacts. This would proactively address future wildfire hazards that may result in damage to open space like the American River Parkway and infrastructure including structures, electrical transmission, and communication facilities; increase rates of erosion, landslide, and water quality degradation; and result in ecological disturbance. CAP Measure FIRE-05 would require the County to avoid new development in Very-High Fire Hazard Severity Zones and consider projections of future climate change when planning future land uses. This would further limit human exposure to wildfire. Therefore, the project would have (1) no peculiar impacts, (2) no significant impacts not analyzed in the GP EIR, or (3) significant off-site impacts and cumulative impacts not discussed in the GP EIR. Therefore, no further analysis is required.

**c) Require the installation 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 to the environment?**

This impact was not evaluated in the GP EIR. Implementation of the CAP would require utility and infrastructure improvements. The effects of these infrastructure improvements are within the scope of the physical environmental effects evaluated throughout the GP EIR and this addendum. Further, the CAP would improve the County's response to wildfire through Measure FIRE-02, which would establish programs to support ecological restoration efforts. Through Measure FIRE-06, the County would develop an integrated approach among agencies and organizations to reduce wildfire hazards within the County. The approach would

ensure that effective fire management extends to a broad geographical area, resulting in a more comprehensive protection against future wildfire events.

The potential infrastructure evaluated in this addendum would not exacerbate fire risk or result in temporary or ongoing risks to the environment beyond those evaluated in conjunction with implementation of the General Plan. Because the CAP would not exacerbate fire risk or result in ongoing environmental impacts related to the installation of associated infrastructure, the CAP would not have (1) peculiar impacts, (2) significant impacts not analyzed in the GP EIR, or (3) significant off-site impacts or cumulative impacts not discussed in the GP EIR. No further analysis is required.

**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?**

The GP EIR does not specifically evaluate exposure to significant risks as a result of runoff, post-fire slope instability, or drainage changes. As described above, the eastern portion of the unincorporated County includes land within the SRA. The area is generally flat grasslands classified as moderate fire hazard severity zone.

Development required to implement the CAP would be limited and would not increase the exposure of people or structures to significant risks. EV charging stations and PV solar facilities would likely be installed in new and existing developments, and roadway improvements would occur along already paved roadways. Although the CAP could result in various infrastructure improvements, it would not introduce people to the area, substantially increase the potential for wildfire, or result in substantial changes to drainage and flooding due to post-fire instability. Projects would comply with local and State regulations related to fire safety. Although this impact was not specifically evaluated in the GP EIR, the CAP would not have (1) peculiar impacts, (2) significant impacts not analyzed in the GP EIR, or (3) significant off-site impacts or cumulative impacts not discussed in the GP EIR. No further analysis is required.

**Mitigation Measures**

Implementation of the CAP would not result in new significant or more severe impacts related to emergency response and evacuation or exacerbation of wildfire risk. No mitigation is required.

**CONCLUSION**

There are no significant impacts that are peculiar to the project. The project would not have any potentially significant impacts or cumulative impacts that were not discussed in the GP EIR. Therefore, the conclusions of the GP EIR remain valid and approval of the project would not require additional environmental review.

## 4 CLIMATE ACTION PLAN STRATEGY OPTIONS

As described above, the proposed CAP has been developed to satisfy the commitments in Mitigation Measures CC-1 and CC-2, which were established in the GP EIR to reduce the impacts of GHG emissions anticipated with implementation of the County's General Plan. The CAP (including the currently proposed suite of GHG reduction measures) evaluated in the environmental checklist meets the GHG reduction targets set by Mitigation Measures CC-1 and CC-2 in the GP EIR. No additional measures are needed to meet this target. Further, as presented in the environmental checklist, the proposed CAP would not result in any new or substantially more severe environmental impacts from those evaluated in the GP EIR. Therefore, there are no requirements for the County to consider or evaluate other GHG reduction measures. However, the County is providing this supplemental analysis of the strategy options identified in Appendix F to the proposed CAP for informational purposes.

The County has engaged various members of the community throughout the development of the CAP (refer to CAP Appendix D, Public Engagement). In addition, the County held a separate listening session in May of 2021 attended by representatives from the Sierra Club, 350 Sacramento, Sac Citizens Climate Lobby, ECOS, Sacramento Metropolitan Air Quality Management District, North State Building Industry Association, Sacramento Builders Exchange, and Sacramento Municipal Utility District regarding development of this analysis. The following strategy options are the product of this outreach and reflect concepts identified in this meeting that could feasibly be implemented within the scope of a CAP, while achieving the objectives of GP EIR Mitigation Measures CC-1 and CC-2.

Traditionally, project alternatives are intended to identify project modifications that would avoid or substantially lessen any significant effects of a project, while still attaining the basic project objectives (see CCR Section 15126.6[a]). However, as demonstrated in this Addendum, the proposed CAP would not result in any new or substantially more severe impacts than disclosed in the GP EIR. Therefore, this evaluation of the comparative merits of the strategy options is provided solely to foster informed decision making and public participation. The ultimate determination as to whether a strategy option is feasible or infeasible is made by the lead agency's decision-making body, here the Board of Supervisors. (See State CEQA Guidelines Sections 21081.5, 21081[a] [3].)

### 4.1 STRATEGY OPTION 1: INFILL DEVELOPMENT

Under this proposed strategy option, the County would pursue a strategy that strongly encourages new growth to occur at sites that are designated as infill. While infill development is already encouraged as part of the County's General Plan (Land Use Strategy II, LU-68, LU-82) and in the CAP (GHG-23), this strategy option would revise the proposed CAP and introduce additional policies intended to promote an increased share of anticipated new development toward underutilized sites within existing urbanized areas of the County. Selection of this strategy option would approve the CAP in its current form along with the following changes and additions.

- The Infill Development fee described in GHG-23 would be increased from \$1,000 to \$2,500 for each Dwelling Unit Equivalent.



- The fees collected from the infill program would be used for a competitive grant program specifically for compact, mixed-use affordable housing projects near transit stations, consistent with General Plan Policy LU-44.
- Amend the Sacramento County Zoning code to include a definition for “Infill Development” that is aligned with the goals of General Plan Land Use Strategy II, which should include vacant lots within with Urban Policy Area (UPA).
- Insert language into CAP Sections 1.1 Climate Action Plan Purpose and Components, and 4 Implementation and Monitoring specifying that the CAP should only be used for streamlining future GHG analyses under CEQA Guidelines Section 15183.5 for projects meeting the County’s definition of infill.

### 4.1.1 Comparative Evaluation of Impacts

Strategy Option 1 is intended to promote infill development, consistent with the adopted General Plan and the analysis of construction and operation of mixed-use infill development in the GP EIR. As discussed further below, the implementation of this strategy option would not result in new or substantially more severe impacts than anticipated in the GP EIR.

#### AESTHETICS

Strategy Option 1 would include all the same GHG reduction and resiliency policies as the proposed CAP. Implementation of these policies would result in circumstances requiring construction activities or equipment, such as use of a tall crane that would temporarily introduce substantial height, bulk, or mass within a scenic vista. Because these circumstances would be rare and the duration would be limited to relatively short periods of the overall construction phase, the temporary effect on scenic vistas would not be substantial. In addition, given the nature of the GHG reduction measures, construction activities associated with their implementation would generally occur in already disturbed, urbanized developed areas such as roadways and parking lots and would not occur within non-urbanized areas. As discussed for the proposed CAP, infrastructure upgrades that would result from implementation would generally be consistent with the existing urban environment. Fees collected by the County from developers/builders would be used for the purposes of facilitating infill development in urban locations that are already targeted for development, but would not directly result in construction of infill.

Implementation of Strategy Option 1 also would result in the use of temporary lighting sources during construction of roadway improvement projects and installation of PV solar systems. Implementation of the other GHG reduction measures in the proposed CAP would not involve short- or long-term physical changes that could result in new substantial sources of light and glare. Enforcement of the Zoning Code would regulate new sources of light and glare to avoid affecting day or nighttime views. For example, Title III requires that lighting be directed away from residential areas and public streets so that glare is not produced that could impact the general safety of vehicular traffic and the privacy and well-being of residents.

To the extent that Strategy Option 1 successfully directs potential development away from undeveloped areas and towards urban infill, this strategy option could reduce impacts of future development on scenic resources in the County. However, this strategy option does not

prohibit development outside of infill areas and the degree to which the additional costs to developers in these areas (both through fees and the obligation to perform individual GHG analyses) would affect land use decisions is unknown. Overall, the aesthetic impacts of Strategy Option 1 would be **slightly less** than the proposed CAP.

## AGRICULTURAL AND FOREST RESOURCES

As described for the proposed CAP, implementation of the GHG reduction measures pertaining to agriculture would establish programs to support and enhance existing agricultural land uses to implement carbon farming practices. Strategy Option 1 does not propose development that would cause incompatible land uses, conversion of Important Farmland to nonagricultural use, or reduction of Williamson Contract acreage. Minor land conversions may be required for infrastructure necessary to implement CAP policies. Upgraded infrastructure is generally considered compatible with agricultural uses, and all subsequent projects would be subject to the requirements of the applicable zoning code. Mitigation measures identified in the GP EIR and in the 2019 Agricultural Element Update would apply to subsequent projects and minimize potential for future loss of Important Farmland or Farmland under Williamson Act Contract.

To the extent that Strategy Option 1 successfully directs potential development away from undeveloped areas and agricultural land and towards urban infill, this strategy option could reduce impacts of future development on agricultural resources. However, this strategy option does not prohibit development outside of infill areas and the degree to which the additional costs to developers in these areas (both through fees and the obligation to perform individual GHG analyses) would affect land use decisions is unknown. Overall, the impacts of Strategy Option 1 on agricultural and forestry resources would be **slightly less** than the proposed CAP.

## AIR QUALITY

Like the proposed CAP, Strategy Option 1 is not a growth-inducing plan and does not contemplate a change in land uses from those discussed in the GP EIR. Implementation of the CAP would not increase development potential beyond what was assumed and analyzed in the GP EIR or result in changes to existing land use and zoning designations. Further, as discussed for the proposed CAP, implementation of Strategy Option 1 would not increase air quality emissions such that they would exceed SMAQMD standards beyond what was considered in the GP EIR. Overall, the impacts of Strategy Option 1 on air quality would be **similar** to the proposed CAP.

## BIOLOGICAL RESOURCES

Because Strategy Option 1 would include the same GHG reduction measures as the CAP, implementation could result in physical impacts (e.g., ground disturbance, vegetation removal, construction) including installation of EV chargers, build-out of projects identified in the Pedestrian Master Plan, roadway improvements associated with traffic calming measures, potential expansion of facilities to increase local capacity for increased organic waste diversion, construction of bicycle storage facilities, installation of on-site renewable energy systems, conversion of streetlights to LEDs, construction of infrastructure to support a regional stormwater harvest program, improvements to existing stormwater infrastructure, and

improvements to existing sewage and solid-waste management infrastructure. These activities would be required to comply with existing federal, State, and local regulations and policies, as well as the SSCHP for projects located in the SSHCP plan area. These activities would also be consistent with General Plan Policies CO-58, CO-59, CO-61, CO-75, CO-76, and CO-78. The GP EIR examined impacts on biological resources that could result from buildout of new growth areas, planned communities, residential infill, and commercial corridors in the unincorporated county through the plan horizon. The types of projects that would result from implementation of Strategy Option 1 and the locations of these projects are consistent with those described in the GP EIR.

To the extent that Strategy Option 1 successfully directs potential development away from undeveloped areas and towards urban infill, this strategy option could reduce impacts of future development on biological resources, including sensitive natural communities and wetlands, in the county. However, this strategy option does not prohibit development outside of infill areas and the degree to which the additional cost of greenfield development would affect land use decisions is unknown. Overall, the impact of Strategy Option 1 on biological resources would be **slightly less** than the proposed CAP.

## CULTURAL RESOURCES

Implementation of Strategy Option 1 would have the potential to alter existing historic and archaeological resources because this strategy option would include the same GHG reduction and adaptation measures with potential to result in physical disturbance or modification of cultural resources. As shown in Plate CR-1 of the GP EIR, areas near waterways are known to support higher concentrations of prehistoric and historic resources (p. 15-8 and 15-9). Although the effect of this strategy option on development patterns is unknown, infill development is not more likely to be located near waterways. Impacts to cultural resources would be **similar** to the proposed CAP.

## ENERGY

As described above for the proposed CAP, the GHG reduction measures common to the proposed CAP and Strategy Option 1 would introduce a series of additional energy-saving measures that promote enhanced energy conservation from projects that are constructed and operated within the county. Overall, the impacts of Strategy Option 1 on energy use would be **similar** to the proposed CAP.

## GEOLOGY AND SOILS

As described above for the proposed CAP, the GHG reduction measures common to the proposed CAP and Strategy Option 1 would support future EV infrastructure, transit access improvements, updates to community and corridor plans, infill development, and solar for County buildings. These activities would be consistent with General Plan and would be required to comply with provisions for geological stability established by the UBC and CBC. In addition, the CAP would not amend, revise, or be inconsistent with any existing regulations related to geology and soils. Overall, the impacts of Strategy Option 1 on geology and soils would be **similar** to the proposed CAP.

## GREENHOUSE GAS EMISSIONS

Strategy Option 1 would include measures that support infill, transit-oriented development, and mixed-use projects to reduce emissions from reduced VMT and increase building energy efficiency. These CAP measures prioritize or incentivize infill, transit-oriented development, and mixed-use projects, all types of measures intended to reduce overall VMT and GHG emissions from mobile sources. Like the CAP, Strategy Option 1 would reduce GHG emissions generated within the unincorporated County by supporting low and zero emissions vehicles and equipment, encouraging green building practices, encouraging carbon sequestration practices, reducing VMT, increasing alternative modes of transportation, and increasing the use of renewable clean energy. In addition, GHG reduction measures that support energy efficiency and renewable energy generation would reduce GHG emissions at power plants generating electricity that serve the unincorporated County.

To the extent that Strategy Option 1 successfully directs potential development away from undeveloped areas and towards urban infill, this strategy option could reduce VMT more than the proposed CAP. However, this strategy option does not prohibit development outside of infill areas and the degree to which the additional cost of greenfield development would affect land use decisions is unknown. This strategy option would also make development outside of infill areas ineligible for streamlining under Section 15183.5 of the State CEQA Guidelines. Generally, these developments would be expected to implement project-specific mitigation measures similar to those identified in the proposed CAP. These developments would also be subject to regularly updated and increasingly stringent performance standards for energy, emissions and VMT set by agencies outside of the County. For example, developments outside of infill areas would still be subject to triennial updates to the California's Building Energy Efficiency Standards, policies in SACOG's State-mandated SCS to reduce regional VMT, and may incorporate Best Management Practices for mitigating GHG emissions from SMAQMD's recently updated CEQA guidelines. Overall, the impact of Strategy Option 1 on GHG emissions would be **slightly less** than the proposed CAP.

## HAZARDS AND HAZARDOUS MATERIALS

Strategy Option 1 would include the GHG reduction measures and resiliency measures evaluated for the proposed CAP. These activities would be consistent with General Plan Policies HM-4, HM-7, HM-11, and HM-14 and would be required to comply with federal, State, and local regulations. As described in the GP EIR, compliance with these regulations is anticipated to substantially avoid the release of hazardous materials associated with routine use and disturbance of hazardous materials. Strategy Option 1 would not amend, revise, or be inconsistent with any existing regulations related hazards and hazardous materials. The additional elements of Strategy Option 1 related to the cost of infill fees and streamlining of GHG analyses would not change the potential for impacts related to hazards and hazardous materials. Impacts would be **similar** to the proposed CAP.

## HYDROLOGY AND WATER QUALITY

Implementation of Strategy Option 1 would not violate water quality standards or waste discharge requirements because the CAP would not result in ground-disturbing activities that would substantially contribute to soil erosion or water quality issues. As discussed for the

proposed CAP, activities would be consistent with General Plan Policies CO-24, CO-27, CO-28, CO-29, CO-30, CO-31, and CO-32 and would be required to comply with the Sacramento County Stormwater Ordinance (Sacramento County Code 15.12), Land Grading and Erosion Control Ordinance (Sacramento County Code 16.44), as well as implementation of an Erosion and Sediment Control Plan, BMPs, and NPDES requirements. Implementation of the CAP would not decrease water supply or increase the rate or amount of runoff because it does not include projects that would substantially increase impervious surfaces or require the use of groundwater.

To the extent that Strategy Option 1 successfully directs potential development away from undeveloped areas and towards urban infill, this strategy option could reduce impacts of future development on hydrology and water quality because infill areas are more likely to be impervious and served by existing stormwater infrastructure under existing conditions. However, this strategy option does not prohibit development outside of infill areas and the degree to which the additional cost of greenfield development would affect land use decisions is unknown. Overall, the impact of Strategy Option 1 on hydrology and water quality would be **slightly less** than the proposed CAP.

## LAND USE AND PLANNING

To the extent that Strategy Option 1 successfully directs potential development away from undeveloped areas and towards urban infill, this strategy option could reduce modifications to land use and planning documents that can result in inconsistencies. However, this strategy option does not prohibit development outside of infill areas and the degree to which the additional cost of greenfield development would affect land use decisions is unknown. Overall, the impact of Strategy Option 1 on land use and planning would be **slightly less** than the proposed CAP.

## MINERAL RESOURCES

As described for the proposed CAP, implementation of Strategy Option 1 could result in the construction of EV infrastructure, transit access improvements, pedestrian network facilities, bicycle network facilities, improvements to travel connectivity, infill development, and improvements to sewage and solid-waste management infrastructure within the county. These activities would be consistent with General Plan Policies CO-38 and CO-44. In addition, the CAP would not amend, revise, or be inconsistent with any existing regulations related to mineral resources.

To the extent that Strategy Option 1 successfully directs potential development away from undeveloped areas and towards urban infill, this strategy option could reduce impacts of future development on mineral resources because infill areas are less likely to contain recoverable mineral resources under existing conditions. However, this strategy option does not prohibit development outside of infill areas and the degree to which the additional cost of greenfield development would affect land use decisions is unknown. Overall, the impact of Strategy Option 1 on mineral resources would be **slightly less** than the proposed CAP.

## NOISE

As described for implementation of the proposed CAP, Strategy Option 1 could result in short-term noise impacts due to the use of heavy-duty construction equipment, worker vehicle trips, and truck hauling trips. However, the construction of infrastructure and development associated with implementation of the CAP within the unincorporated county would be consistent with the type and scale of construction considered in the GP EIR and would be exempt from maximum noise level requirements provided associated construction activities do not take place during the specified hours set forth in County Code section 6.68.090(e), limiting the level of noise exposure to surrounding sensitive receptors.

Strategy Option 1 would not result in an increase in noise from operational noise sources because CAP measures would not result the development of substantial stationary or transportation noise sources. Further, the GP EIR contemplates long-term operational noise sources associated with increased vehicle noise and Strategy Option 1 would not result in a more severe impact compared to what was evaluated in the GP EIR. Additionally, implementation of Strategy Option 1 would not result in increased exposure to people residing or working in the project area to excessive noise levels because any development would be required to demonstrate consistency with the ALUCP/CLUP that include policies and regulations to address airport noise. Strategy Option 1 would result in noise impacts **similar** to those associated with the proposed CAP.

## POPULATION AND HOUSING

Implementation of Strategy Option 1 would not induce population growth, because the GHG reduction measures do not propose new housing, nor do they propose changes to policies or regulations related to land use or residential zoning. Although it would incentivize infill development, Strategy Option 1 would not result in development proposals with a population-generating component. The fees collected by the County from developers/builders would be used for the purposes of facilitating infill development. Strategy Option 1 would result in population and housing impacts **similar** to those associated with the proposed CAP.

## PUBLIC SERVICES

Implementation of Strategy Option 1 would not directly affect the provision of public services, nor contribute to population growth that could result in an increase in demand for fire protection and emergency services. Therefore, implementation of Strategy Option 1 would not result in facilities that would be substantially different or in areas that are different from those identified in the General Pan. Although this strategy option would incentivize infill development, it would not result in development proposals with a population-generating component. Further, future projects would be required to comply with General Plan policies related to adequate fire public services. Strategy Option 1 would result in impacts to public services that are **similar** to the proposed CAP.

## RECREATION

Implementation of Strategy Option 1 would not directly affect the provision of park and recreation facilities, nor contribute to population growth that could increase the use of existing park and recreation facilities resulting in the physical deterioration of such facilities. Although this strategy option would incentivize infill development, it would not result in development proposals with a population-generating component. Further, future projects would be required to comply with General Plan Policies PF-123, PF-124, and PF-125, which direct the County to require that new development provide park and recreation facilities through the provision of land dedication, payment of in-lieu fees, or on-site improvements. Strategy Option 1 would result in recreation impacts that are **similar** to the proposed CAP.

## TRANSPORTATION

Strategy Option 1 would include the same GHG reduction measures as the proposed CAP, including those intended to reduce VMT, as well as additional programs intended to discourage growth in areas of the unincorporated county that would result in higher VMT per capita. As described above, subsequent development projects under the CAP would be subject to all applicable County guidelines, standards, and specifications related to transit, bicycle, or pedestrian facilities.

To the extent that Strategy Option 1 successfully directs potential development away from undeveloped areas and towards urban infill, this strategy option could reduce VMT more than the proposed CAP. However, this strategy option does not prohibit development outside of infill areas and the degree to which the additional cost of greenfield development would affect land use decisions is unknown. Overall, the transportation impacts of Strategy Option 1 would be **slightly less** than the proposed CAP.

## UTILITIES AND SERVICE SYSTEMS

Implementation of Strategy Option 1 would not result in the relocation or construction of new or expanded utility services systems because implementation of GHG reduction measures would not involve development of residential communities or other similar types of development or induce population growth in an area that would increase demand for expanded utility services. As discussed for the proposed CAP, proposed measures would also improve water efficiency by formally adopting a water reduction target for new and existing buildings and replacing water-wasting equipment. In addition, implementation of the GHG reduction measures would promote clean energy and sustainable resource management by supporting future EV infrastructure, transit access improvements, and solar for county buildings.

Strategy Option 1 would further incentivize infill development, with the fees collected by the County from developers/builders used for the purposes of facilitating infill development in urban locations that are already targeted for development. To the extent that Strategy Option 1 successfully directs potential development away from undeveloped areas and towards urban infill areas with existing capacity for planned growth, this strategy option could reduce construction of new or expanded utility infrastructure. However, this strategy option does not prohibit development outside of infill areas and the degree to which the additional cost of greenfield development would affect land use decisions is unknown. Overall, the impact of Strategy Option 1 on utilities and service systems would be **slightly less** than the proposed CAP.

## WILDFIRE

Development required to implement the CAP would be limited and would not increase the exposure of people or structures to significant wildfire hazards or exacerbate fire risk. EV charging stations and PV solar facilities would likely be installed in new and existing developments, and roadway improvements would occur along already paved roadways. Although the CAP could result in various infrastructure improvements, it would not introduce people to the area, substantially increase the potential for wildfire, or result in substantial changes to drainage and flooding due to post-fire instability.

Strategy Option 1 may result in less development of open space, which would reduce the potential to exacerbate wildfire potential in those areas. However, the American River Parkway, which largely extends through urban and developed areas, is one of the County's most wildfire-prone environments. Overall, the impacts of Strategy Option 1 would be **similar** to the proposed CAP.

## 4.2 STRATEGY OPTION 2: COMMUNITYWIDE CARBON NEUTRALITY

A Climate Emergency Resolution adopted by the Sacramento County Board of Supervisors on December 17, 2020 commits the County to take several steps to transition to a countywide carbon neutrality footprint by 2030. A 2030 carbon neutrality goal and task force are mentioned in the following portions of the Resolution (emphasis added).

- Develop and implement a climate and sustainability plan that identifies and integrates current and future actions necessary to achieve an equitable, sustainable, and resilient economy and transition to a countywide carbon neutrality footprint by 2030.
- Communitywide Climate Action Plan shall explain the County's approach to reduce greenhouse gas emissions in order to achieve carbon neutrality by 2030, building on recommendations and analysis from community partners, and suggested mitigation measures from climate experts, urban and regional planners, community members, and economists. Development and implementation of the plan shall be guided by science, data, best practices, and equity concerns.
- Build on existing climate action commitments and taking significant steps to sustain and accelerate short term communitywide carbon elimination, and all efforts and actions necessary to eliminate emissions by 2030, recognizing that such a goal will only be achieved through regional collaboration between multiple partners.
- Evaluate the resources necessary to achieve carbon neutrality by 2030, and the emergency actions required to eliminate emissions by 2030. Where existing funding or resources do not support the level of action required, County staff shall identify gaps and provide recommendations to the County Executive and Board of Supervisors.
- The County of Sacramento will establish, within 60 days, a permanent Climate Emergency Mobilization Task Force composed of climate experts including but not limited to representatives of the scientific community and academia to oversee the development and implementation of a climate emergency response plan utilized by all



departments within the County of Sacramento, and each department shall assign a point person to provide regular updates to the Task Force and the Board of Supervisors concerning departmental progress in reducing emissions.

The GHG reduction target in the proposed CAP was developed prior to adoption of the Resolution and identified a 2030 GHG emissions target of 6 MTCO<sub>2e</sub> per capita based on alignment with the 2017 Scoping Plan. Section 2.4 of the CAP delays setting a 2030 climate neutrality target to future planned updates to the CAP that would happen concurrently with initiation of an anticipated update to the County's General Plan.

Under this strategy option, the following sections of the CAP would be amended to include the following changes aimed at supporting a more immediate transition to countywide carbon neutrality.

- Section 1.3 *Greenhouse Gas Reduction Targets for 2030*
  - Include a goal for achieving communitywide carbon neutrality by 2030.
- Section 2.4 *Carbon Neutrality*
  - Revise final paragraph to remove language that makes establishment of a carbon neutrality goal contingent on future updates to CAP, Scoping Plan, General Plan, and Natural and Working Lands Climate Smart Strategy.
- Section 4 *Implementation and Monitoring Strategy*
  - Assign the Climate Emergency Mobilization Task Force to begin immediate work on preparing the Climate Emergency Response Plan (CERP) described in the County's Climate Emergency Resolution.
  - Expand the list of eligible Task Force participants to include professionals with backgrounds in sociology, law, environmental policy, energy, and economics.
  - Specify that the CERP evaluate the feasibility of additional department actions for GHG reduction supplemental to those indicated in Section 2 of the CAP. These actions would be aimed at closing the emissions gap needed to reduce countywide emissions to carbon neutrality by 2030. County department actions to be evaluated for feasibility in the CERP would include but not be limited to:
    - Prohibiting issuance of business licenses to companies that provide fuels, equipment, and services that result in the combustion of fossil fuels (e.g. gas stations, car and motorcycle dealerships, auto repair centers, heavy equipment operators and distributors).
    - Adopting an ordinance that requires existing residential and non-residential building to undergo retrofitting to eliminate natural gas consumption when the property is sold to another party (point-of-sale).
    - Implementing toll roads on major County thoroughfares with congestion pricing to reduce GHG emissions from VMT associated with daily commuting.

- Issue a moratorium on new building permits if countywide emissions are exceeding 2.0 MTCO<sub>2e</sub> per capita in 2026. This is based on the projection shown in Table 4.2-1 illustrating a linear drawdown of community GHG emissions from an observed baseline of 8.4 MTCO<sub>2e</sub> in 2015 to a carbon neutral level of 0 MTCO<sub>2e</sub> per capita in 2030.

**Table 4.2-1  
Carbon Neutral GHG Reduction Projection**

Year	MT CO <sub>2e</sub>	County Population	MTCO <sub>2e</sub> Per Capita
2015	4,817,567	576,007	8.4
2016	4,496,396	582,188	7.7
2017	4,175,225	588,370	7.1
2018	3,854,054	594,551	6.5
2019	3,532,882	600,732	5.9
2020	3,211,711	606,913	5.3
2021	2,890,540	613,095	4.7
2022	2,569,369	619,276	4.1
2023	2,248,198	625,457	3.6
2024	1,927,027	631,638	3.1
2025	1,605,856	637,820	2.5
<b>2026</b>	<b>1,284,685</b>	<b>644,001</b>	<b>2.0</b>
2027	963,513	650,182	1.5
2028	642,342	656,363	1.0
2029	321,171	662,545	0.5
2030	0	668,726	—

### 4.2.1 Comparative Evaluation of Impacts

Strategy Option 2 is intended to align with the Climate Emergency Resolution adopted by the Sacramento County Board of Supervisors on December 17, 2020. This strategy option commits the County to take several steps to transition to a countywide carbon neutrality footprint by 2030, recognizing that additional discussion would be required to identify appropriate policies for inclusion in the CERP because the types of actions required to achieve carbon neutrality by 2030 could involve social and economic considerations best addressed outside of CEQA. The following analysis assumes implementation of the four policies recommended for consideration: prohibition on issuance of business licenses to companies that provide fuels, equipment, and services that result in the combustion of fossil fuels; point-of-sale conversion to all electric building energy use; adding tolls to major County-operated thoroughfares; and issuing a new building moratorium based on per capita VMT. As discussed further below, implementation of this strategy option would not result in new or substantially more severe impacts than anticipated in the GP EIR.

### AESTHETICS

Strategy Option 2 would include all the same GHG reduction and resiliency policies as the proposed CAP. Implementation of these policies would result in circumstances requiring construction activities or equipment, such as use of a tall crane that would temporarily

introduce substantial height, bulk, or mass within a scenic vista. Because these circumstances would be rare and the duration would be limited to relatively short periods of the overall construction phase, the temporary effect on scenic vistas would not be substantial. In addition, given the nature of the GHG reduction measures, construction activities associated with their implementation would generally occur in already disturbed, urbanized developed areas such as roadways and parking lots and would not occur within non-urbanized areas. As discussed for the proposed CAP, infrastructure upgrades that would result from implementation would generally be consistent with the existing urban environment. Fees collected by the County from developers/builders would be used for the purposes of facilitating infill development in urban locations that are already targeted for development but would not directly result in construction of infill.

Implementation of Strategy Option 2 also would result in the use of temporary lighting sources during construction of roadway improvement projects and installation of PV solar systems. Implementation of the other GHG reduction measures in the proposed CAP would not involve short- or long-term physical changes that could result in new substantial sources of light and glare. Enforcement of the Zoning Code would regulate new sources of light and glare to avoid affecting day or nighttime views. For example, Title III requires that lighting be directed away from residential areas and public streets so that glare is not produced that could impact the general safety of vehicular traffic and the privacy and well-being of residents.

Strategy Option 2 could result in a variety of indirect effects due to CERP actions. For example, restricting business licenses could result in the creation of underutilized commercial space that becomes an eyesore. Requiring point-of-sale conversion to electric energy use could, similarly, result in an increase in vacant buildings that are not quickly sold. Uniformly prohibiting new development could also restrict revitalization of urban areas where development of vacant parcels could benefit the aesthetic of the community. However, it would also eliminate the potential for new construction in greenspace and agricultural areas. These would be visual tradeoffs that cannot be determined with certainty at this time. Overall, the aesthetic impacts of Strategy Option 2 would be **similar** to the proposed CAP.

## AGRICULTURAL AND FOREST RESOURCES

As described for the proposed CAP, implementation of the GHG reduction measures pertaining to agriculture would establish programs to support and enhance existing agricultural land uses to implement carbon farming practices. Strategy Option 2 does not propose development that would cause incompatible land uses, convert of Important Farmland to nonagricultural use, or reduce Williamson Contract acreage. Minor land conversions may be required for infrastructure necessary to implement CAP policies. Upgraded infrastructure is generally considered compatible with agricultural uses, and all subsequent projects would be subject to the requirements of the applicable zoning code.

To the extent that Strategy Option 2 results in a moratorium on new building permits, this strategy option could reduce impacts of future development on agricultural resources. However, the actual effect is unknown. Overall, the impacts of Strategy Option 2 on agricultural and forestry resources would be **similar** to the proposed CAP.

## AIR QUALITY

Like the proposed CAP, Strategy Option 2 is not a growth-inducing plan and does not contemplate a change in land uses from those discussed in the GP EIR. Implementation of the CAP would not increase development potential beyond what was assumed and analyzed in the GP EIR or result in changes to existing land use and zoning designations. Further, as discussed for the proposed CAP, implementation of Strategy Option 2 would not increase air quality emissions such that they would exceed SMAQMD standards beyond what was considered in the GP EIR. Further, by not issuing business licenses to companies that provide fuels, equipment, and services that result in the combustion of fossil fuels, this strategy option could improve local air quality. Overall, the impacts of Strategy Option 2 on air quality would be **slightly less** than the proposed CAP.

## BIOLOGICAL RESOURCES

Because Strategy Option 2 would include the same GHG reduction measures as the CAP, implementation could result in physical impacts (e.g., ground disturbance, vegetation removal, construction) including installation of EV chargers, build-out of projects identified in the Pedestrian Master Plan, roadway improvements associated with traffic calming measures, potential expansion of facilities to increase local capacity for increased organic waste diversion, construction of bicycle storage facilities, installation of on-site renewable energy systems, conversion of streetlights to LEDs, construction of infrastructure to support a regional stormwater harvest program, improvements to existing stormwater infrastructure, and improvements to existing sewage and solid-waste management infrastructure. These activities would be required to comply with existing federal, State, and local regulations and policies, as well as the SSCHP for projects located in the SSHCP plan area. These activities would also be consistent with General Plan Policies CO-58, CO-59, CO-61, CO-75, CO-76, and CO-78.

To the extent that Strategy Option 2 results in a moratorium on new building permits, this strategy option could reduce impacts of future development on biological resources. However, the actual effect is unknown. Overall, the impacts of Strategy Option 2 on biological resources would be **similar** to the proposed CAP.

## CULTURAL RESOURCES

Implementation of Strategy Option 2 would have the potential to alter existing historic and archaeological resources because this strategy option would include the same GHG reduction and adaptation measures with potential to result in physical disturbance or modification of cultural resources. While point-of-sale conversions to electric power may result in alterations to historic structures, these types of retrofits are typically compatible with the historic exterior of the buildings. Strategy Option 2 would result in **similar** impacts to the proposed CAP.

## ENERGY

As described above for the proposed CAP, the GHG reduction measures common to the proposed CAP and Strategy Option 2 would introduce a series of additional energy-saving measures that promote enhanced energy conservation from projects that are constructed and operated within the County. The additional measures required to achieve communitywide

carbon neutrality would also result in reduced energy use. As a result, the impacts of Strategy Option 2 on energy use would be **less** than the proposed CAP.

## GEOLOGY AND SOILS

As described above for the proposed CAP, the GHG reduction measures common to the proposed CAP and Strategy Option 2 would support future EV infrastructure, transit access improvements, updates to community and corridor plans, infill development, and solar for County buildings within the County. These activities would be consistent with General Plan and would be required to comply with provisions for geological stability established by the UBC and CBC. In addition, the CAP would not amend, revise, or be inconsistent with any existing regulations related to geology and soils. Overall, the impacts of Strategy Option 2 on geology and soils would be **similar** to the proposed CAP.

## GREENHOUSE GAS EMISSIONS

Strategy Option 2 would include measures that support infill, transit-oriented development, and mixed-use projects to reduce emissions from reduced VMT and increase building energy efficiency. These CAP measures prioritize or incentivize infill, transit-oriented development, and mixed-use projects, all types of measures intended to reduce overall VMT and GHG emissions from mobile sources. Like the CAP, Strategy Option 2 would reduce GHG emissions generated within the unincorporated County by supporting low and zero emissions vehicles and equipment, encouraging green building practices, encouraging carbon sequestration practices, reducing VMT, increasing alternative modes of transportation, and increasing the use of renewable clean energy. In addition, GHG reduction measures that support energy efficiency and renewable energy generation would reduce GHG emissions at power plants generating electricity that serve the unincorporated County.

To achieve carbon neutrality, Strategy Option 2 would include additional measures to reduce GHG emissions in the County. This is anticipated to include adding tolls to County-operated roads to discourage unnecessary travel; point-of-sale conversion from gas to electric energy in existing homes and commercial buildings; and a ban on issuing business licenses to companies that provide fuels, equipment, and services that result in the combustion of fossil fuels. This strategy option would also prohibit new development if the county exceeds average per capita emissions of 2 MTCO<sub>2e</sub> in 2026, which is the level of CO<sub>2e</sub> anticipated necessary to achieve carbon neutrality by 2030. Overall, strategy option 2 would result in **less** impact than the proposed CAP.

## HAZARDS AND HAZARDOUS MATERIALS

Strategy Option 2 would include the GHG reduction measures and resiliency measures evaluated for the proposed CAP. These activities would be consistent with General Plan Policies HM-4, HM-7, HM-11, and HM-14 and would be required to comply with federal, State, and local regulations. As described in the GP EIR, compliance with these regulations is anticipated to substantially avoid the release of hazardous materials associated with routine use and disturbance of hazardous materials. Strategy Option 2 would not amend, revise, or be inconsistent with any existing regulations related hazards and hazardous materials. The additional elements of Strategy Option 2 related to the cost of infill fees and streamlining of

GHG analyses would not change the potential for impacts related to hazards and hazardous materials. Impacts would be **similar** to the proposed CAP.

## HYDROLOGY AND WATER QUALITY

Implementation of Strategy Option 2 would not violate water quality standards or waste discharge requirements because the CAP would not result in ground-disturbing activities that would substantially contribute to soil erosion or water quality issues. As discussed for the proposed CAP, activities would be consistent with General Plan Policies CO-24, CO-27, CO-28, CO-29, CO-30, CO-31, and CO-32 and would be required to comply with the Sacramento County Stormwater Ordinance (Sacramento County Code 15.12), Land Grading and Erosion Control Ordinance (Sacramento County Code 16.44), as well as implementation of an Erosion and Sediment Control Plan, BMPs, and NPDES requirements. Implementation of the CAP would not decrease water supply or increase the rate or amount of runoff because it does not include projects that would substantially increase impervious surfaces or require the use of groundwater.

To the extent that Strategy Option 2 results in a moratorium on new building permits, this strategy option could reduce impacts of future development on biological resources. However, the actual effect is unknown. Overall, the impacts of Strategy Option 2 on hydrology and water quality would be **similar** to the proposed CAP.

## LAND USE AND PLANNING

Strategy Option 2 would not physically divide an established community or conflict with an adopted land use plan. Impacts would be **similar** to the proposed CAP.

## MINERAL RESOURCES

As described for the proposed CAP, implementation of Strategy Option 2 could result in the construction of EV infrastructure, transit access improvements, pedestrian network facilities, bicycle network facilities, improvements to travel connectivity, infill development, and improvements to sewage and solid-waste management infrastructure within the County. These activities would be consistent with General Plan Policies CO-38 and CO-44. In addition, the CAP would not amend, revise, or be inconsistent with any existing regulations related to mineral resources. If this strategy option were to result in a building moratorium, there could be a temporary reduction in potential for impacts to the availability of mineral resources. Impacts would be **similar** to the proposed CAP.

## NOISE

As described for implementation of the proposed CAP, Strategy Option 2 could result in short-term noise impacts due to the use of heavy-duty construction equipment, worker vehicle trips, and truck hauling trips. However, the construction of infrastructure and development associated with implementation of the CAP would be consistent with the type and scale of construction considered in the GP EIR and would be exempt from maximum noise level requirements provided associated construction activities do not take place during the specified hours set forth in County Code section 6.68.090(e), limiting the level of noise exposure to surrounding sensitive receptors.

Strategy Option 2 would not result in an increase in noise from operational noise sources because CAP measures would not result the development of substantial stationary or transportation noise sources. Further, the GP EIR contemplates long-term operational noise sources associated with increased vehicle noise and Strategy Option 2 would not result in a more severe impact compared to what was evaluated in the GP EIR. Additionally, implementation of Strategy Option 2 would not result in increased exposure to people residing or working in the project area to excessive noise levels because any development would be required to demonstrate consistency with the ALUCP/CLUP that include policies and regulations to address airport noise. Strategy Option2 would result in noise impacts **similar** to those associated with the proposed CAP.

## POPULATION AND HOUSING

Implementation of Strategy Option 2 would not induce population growth, because the GHG reduction measures do not propose new housing, nor do they propose changes to policies or regulations related to land use or residential zoning. Although it would incentivize infill development, Strategy Option 2 would not result in development proposals with a population-generating component. The fees collected by the County from developers/builders would be used for the purposes of facilitating infill development. Strategy Option 2 would result in population and housing impacts **similar** to those associated with the proposed CAP.

## PUBLIC SERVICES

Implementation of Strategy Option 2 would not directly affect the provision of public services, nor contribute to population growth that could result in an increase in demand for fire protection and emergency services. Therefore, implementation of Strategy Option 2 would not result in facilities that would be substantially different or in areas that are different from those identified in the General Pan. Strategy Option 2 would result in impacts to public services that are **similar** to the proposed CAP.

## RECREATION

Implementation of Strategy Option 2 would not directly affect the provision of park and recreation facilities, nor contribute to population growth that could increase the use of existing park and recreation facilities resulting in the physical deterioration of such facilities. Although this strategy option would incentivize infill development, it would not result in development proposals with a population-generating component. Further, future projects would be required to comply with General Plan Policies PF-123, PF-124, and PF-125, which direct the County to require that new development provide park and recreation facilities through the provision of land dedication, payment of in-lieu fees, or on-site improvements. Strategy Option 2 would result in recreation impacts that are **similar** to the proposed CAP.

## TRANSPORTATION

Strategy Option 2 would include the same GHG reduction measures as the proposed CAP, including those intended to reduce VMT, as well as additional programs to reduce VMT, potentially including toll roads. As described above, subsequent development projects under the CAP would be subject to all applicable County guidelines, standards, and specifications

related to transit, bicycle, or pedestrian facilities. Overall, the impact of Strategy Option 2 would be substantially **similar** to the proposed CAP.

## UTILITIES AND SERVICE SYSTEMS

Implementation of Strategy Option 2 would not result in the relocation or construction of new or expanded utility services systems because implementation of GHG reduction measures would not involve development of residential communities or other similar types of development or induce population growth in an area that would increase demand for expanded utility services. As discussed for the proposed CAP, proposed measures would also improve water efficiency by formally adopting a water reduction target for new and existing buildings and replacing water-wasting equipment. In addition, implementation of the GHG reduction measures would promote clean energy and sustainable resource management by supporting future EV infrastructure, transit access improvements, and solar for County buildings. Overall, the impact of Strategy Option 2 on utilities and service systems would be **slightly less** than the proposed CAP.

## WILDFIRE

Development required to implement the CAP would be limited and would not increase the exposure of people or structures to significant wildfire hazards or exacerbate fire risk. EV charging stations and PV solar facilities would likely be installed in new and existing developments, and roadway improvements would occur along already paved roadways. Although the CAP could result in various infrastructure improvements, it would not introduce people to the area, substantially increase the potential for wildfire, or result in substantial changes to drainage and flooding due to post-fire instability. Overall, the impacts of Strategy Option 2 would be **similar** to the proposed CAP.

### 4.3 STRATEGY OPTION 3: CARBON NEUTRAL NEW DEVELOPMENT

Under this strategy option, the CAP would be amended to add a new GHG reduction measure that would require future development projects needing an amendment to the Urban UPA and/or USB to demonstrate zero net GHG emissions from project construction and operation. To demonstrate this, a GHG analysis would be required for inclusion in project applications that calculates project GHG emissions during construction and full buildout and reduces these emissions to 0 MT CO<sub>2</sub>e through advanced project designs that incorporate energy efficiency, renewable energy generation, clean transportation, carbon sequestration and/or investments in initiatives with validated GHG reduction benefits. The GHG analysis would also calculate the loss of carbon sequestration capacity of the proposed development project area. The combination of these analyses would take into account the loss of carbon sequestration as well as the increase in GHG emissions associated with the development proposals. Under existing General Plan policies, proposed master plans outside of the UPA and USB are already required to submit justification statements (LU-119) and demonstrate compliance with design and performance standards (LU-120) prior to the County considering approval of the project.

A carbon neutral development standard identified in the CAP would become part of these existing requirements. Specifically, LU-120 states “the County shall only consider approval of a proposed UPA expansion and/or Master Plan outside of the existing UPA if the Board finds



that the proposed project is planned and will be built in a manner that: meets all of the requirements per PC-1 through PC-10 and meets ONE of two alternative performance metrics: Alternative #1- Criteria-Based or Alternative #2 VMT/GHG Emissions Reduction Metric.” Within these requirements PC-8, contained in the General Plan Land Use Element, specifies that the project must demonstrate “consistency with all applicable County adopted plans not sought to be amended by the proposed project.” A plan consistency check at this stage could include a County adopted CAP that contains a measure requiring carbon neutrality in new development outside of the UPA established in the General Plan. Such a requirement could be supplemental to the existing Alternative #2 VMT/GHG metric, which addresses GHG emissions exclusively from the transportation sector of project construction and operations. To ensure that applicant-submitted carbon neutrality plans are proposing GHG reduction strategies with legitimate long-term benefits, the implementation and responsibility details of CAP Measure GHG-30 would specify the involvement of a third-party agency or registry body to assist County staff with reviewing that portion of the application.

### 4.3.1 Comparative Evaluation of Impacts

Strategy Option 3 would require carbon neutrality for all new development proposed outside the UPA and USB. In the near term, imposition of this standard could impede growth in undeveloped areas of the County. However, with advancement in technology and the availability of the necessary materials, no long-term effects on development would be anticipated. As discussed further below, implementation of this strategy option would not result in new or substantially more severe impacts than anticipated in the GP EIR.

## AESTHETICS

Strategy Option 3 would include all the same GHG reduction and resiliency policies as the proposed CAP. Implementation of these policies would result in circumstances requiring construction activities or equipment, such as use of a tall crane that would temporarily introduce substantial height, bulk, or mass within a scenic vista. Because these circumstances would be rare and the duration would be limited to relatively short periods of the overall construction phase, the temporary effect on scenic vistas would not be substantial. In addition, given the nature of the GHG reduction measures, construction activities associated with their implementation would generally occur in already disturbed, urbanized developed areas such as roadways and parking lots and would not occur within non-urbanized areas. As discussed for the proposed CAP, infrastructure upgrades that would result from implementation would generally be consistent with the existing urban environment. Fees collected by the County from developers/builders would be used for the purposes of facilitating infill development in urban locations that are already targeted for development but would not directly result in construction of infill.

Implementation of Strategy Option 3 also would result in the use of temporary lighting sources during construction of roadway improvement projects and installation of PV solar systems. Implementation of the other GHG reduction measures in the proposed CAP would not involve short- or long-term physical changes that could result in new substantial sources of light and glare. Enforcement of the Zoning Code would regulate new sources of light and glare to avoid affecting day or nighttime views. For example, Title III requires that lighting be directed away from residential areas and public streets so that glare is not produced that could impact the general safety of vehicular traffic and the privacy and well-being of residents.

To the extent that Strategy Option 3 successfully directs potential development away from undeveloped areas, this strategy option could reduce impacts of future development on scenic resources in the county. However, Strategy Option 3 would not prohibit development outside of the UPA and the degree to which the additional costs to developers in these areas (as a result of materials costs) would affect land use decisions is unknown. Overall, the aesthetic impacts of Strategy Option 3 would be **similar** to the proposed CAP.

## AGRICULTURAL AND FOREST RESOURCES

As described for the proposed CAP, implementation of the GHG reduction measures pertaining to agriculture would establish programs to support and enhance existing agricultural land uses to implement carbon farming practices. Strategy Option 3 does not propose development that would cause incompatible land uses, conversion of Important Farmland to nonagricultural use, or reduce Williamson Contract acreage. Minor land conversions may be required for infrastructure necessary to implement CAP policies. Upgraded infrastructure is generally considered compatible with agricultural uses, and all subsequent projects would be subject to the requirements of the applicable zoning code. Requiring carbon neutral development for UPA and/or USB expansions would not affect potential for impacts to agricultural and forest resources. Impacts as a result of implementing Strategy Option 3 would be **similar** to the proposed CAP.

## AIR QUALITY

Like the proposed CAP, Strategy Option 3 is not a growth-inducing plan and does not contemplate a change in land uses from those discussed in the GP EIR. Implementation of the CAP would not increase development potential beyond what was assumed and analyzed in the GP EIR or result in changes to existing land use and zoning designations. Further, as discussed for the proposed CAP, implementation of Strategy Option 3 would not increase air quality emissions such that they would exceed SMAQMD standards beyond what was considered in the GP EIR. Further, by requiring carbon neutral development for UPA and/or USB expansions, this strategy option could improve air quality. Overall, the impacts of Strategy Option 3 on air quality would be **slightly less** than the proposed CAP.

## BIOLOGICAL RESOURCES

Strategy Option would include the same GHG reduction measures as the CAP. Implementation could result in physical effects on the environment and would be required to comply with existing federal, State, and local regulations and policies, as well as the SSCHP for projects located in the SSHCP plan area. These activities would also be consistent with General Plan Policies CO-58, CO-59, CO-61, CO-75, CO-76, and CO-78. Requiring carbon neutral development for UPA and/or USB expansions would not affect potential for impacts to biological resources because the same potential land areas would be developed. Strategy Option 3 would result in **similar** impacts to the proposed CAP.

## CULTURAL RESOURCES

Implementation of Strategy Option 3 would have the potential to alter existing historic and archaeological resources because this strategy option would include the same GHG

reduction and adaptation measures with potential to result in physical disturbance or modification of cultural resources. Requiring carbon neutral development for UPA and/or USB expansions would not affect potential for impacts to cultural resources because the same land areas could be potentially developed. Strategy Option 3 would result in **similar** impacts to the proposed CAP.

## ENERGY

As described above for the proposed CAP, the GHG reduction measures common to the proposed CAP and Strategy Option 3 would introduce a series of additional energy-saving measures that promote enhanced energy conservation from projects that are constructed and operated within the County. Requiring new development outside of the UPA and/or USB to be carbon neutral would result in these projects adopting a variety of measures to reduce GHG emissions, which could result in reduced energy use. Overall, the impacts of Strategy Option 3 on energy use would be **slightly less** than to the proposed CAP.

## GEOLOGY AND SOILS

As described above for the proposed CAP, the GHG reduction measures common to the proposed CAP and Strategy Option 3 would support future EV infrastructure, transit access improvements, updates to community and corridor plans, infill development, and solar for County buildings within the County. These activities would be consistent with General Plan and would be required to comply with provisions for geological stability established by the UBC and CBC. In addition, the CAP would not amend, revise, or be inconsistent with any existing regulations related to geology and soils. Requiring carbon neutral development for UPA and/or USB expansions would not affect potential for impacts to geology and soils. Overall, the impacts of Strategy Option 3 on energy use would be **similar** to the proposed CAP.

## GREENHOUSE GAS EMISSIONS

Strategy Option 3 would include measures that support infill, transit-oriented development, and mixed-use projects to reduce emissions from reduced VMT and increase building energy efficiency. These CAP measures prioritize or incentivize infill, transit-oriented development, and mixed-use projects, all types of measures intended to reduce overall VMT and GHG emissions from mobile sources. Like the CAP, Strategy Option 3 would reduce GHG emissions generated within the unincorporated County by supporting low and zero emissions vehicles and equipment, encouraging green building practices, encouraging carbon sequestration practices, reducing VMT, increasing alternative modes of transportation, and increasing the use of renewable clean energy. In addition, GHG reduction measures that support energy efficiency and renewable energy generation would reduce GHG emissions at power plants generating electricity that serve the unincorporated County.

To achieve carbon neutrality, new development outside of the UPA and/or USB would include additional measures, including energy efficiency, renewable energy generation, clean transportation, carbon sequestration and/or investments in initiatives with validated GHG reduction benefits, to further reduce GHG emissions. Overall, Strategy Option 3 would result in **less** impact than the proposed CAP.

## HAZARDS AND HAZARDOUS MATERIALS

Strategy Option 3 would include the GHG reduction measures and resiliency measures evaluated for the proposed CAP. These activities would be consistent with General Plan Polices HM-4, HM-7, HM-11, and HM-14 and would be required to comply with federal, State, and local regulations. As described in the GP EIR, compliance with these regulations is anticipated to substantially avoid the release of hazardous materials associated with routine use and disturbance of hazardous materials. Strategy Option 3 would not amend, revise, or be inconsistent with any existing regulations related hazards and hazardous materials. Requiring carbon neutral development for UPA and/or USB expansions would not affect potential for impacts to hazards and hazardous materials because the same type of development would occur. Overall, the impacts of Strategy Option 3 on energy use would be **similar** to the proposed CAP.

## HYDROLOGY AND WATER QUALITY

Implementation of Strategy Option 3 would not violate water quality standards or waste discharge requirements because the CAP would not result in ground-disturbing activities that would substantially contribute to soil erosion or water quality issues. As discussed for the proposed CAP, activities would be consistent with General Plan Polices CO-24, CO-27, CO-28, CO-29, CO-30, CO-31, and CO-32 and would be required to comply with the Sacramento County Stormwater Ordinance (Sacramento County Code 15.12), Land Grading and Erosion Control Ordinance (Sacramento County Code 16.44), as well as implementation of an Erosion and Sediment Control Plan, BMPs, and NPDES requirements. Implementation of the CAP would not decrease water supply or increase the rate or amount of runoff because it does not include projects that would substantially increase impervious surfaces or require the use of groundwater.

Overall, the impacts of Strategy Option 3 on hydrology and water quality would be **similar** to the proposed CAP.

## LAND USE AND PLANNING

Strategy Option 3 would not physically divide an established community or conflict with an adopted land use plan. To achieve carbon neutrality, new development outside of the UPA and/or USB would include additional measures, including energy efficiency, renewable energy generation, clean transportation, carbon sequestration and/or investments in initiatives with validated GHG reduction benefits, to further reduce GHG emissions. Requiring carbon neutral development for UPA and/or USB expansions would not affect potential for impacts to land use and planning as the same areas would be potentially developed. Further, this strategy option would encourage development to occur within the established UPA. Overall, the impacts of Strategy Option 3 on land use and planning would be **similar** to the proposed CAP.

## MINERAL RESOURCES

As described for the proposed CAP, implementation of Strategy Option 3 could result in the construction of EV infrastructure, transit access improvements, pedestrian network facilities, bicycle network facilities, improvements to travel connectivity, infill development, and

improvements to sewage and solid-waste management infrastructure within the County. These activities would be consistent with General Plan Policies CO-38 and CO-44. In addition, the CAP would not amend, revise, or be inconsistent with any existing regulations related to mineral resources. Requiring carbon neutral development for UPA and/or USB expansions would not affect potential for impacts to mineral resources because the same areas would be potentially developed. Impacts would be **similar** to the proposed CAP.

## NOISE

As described for implementation of the proposed CAP, Strategy Option 3 could result in short-term noise impacts due to the use of heavy-duty construction equipment, worker vehicle trips, and truck hauling trips. However, the construction of infrastructure and development associated with implementation of the CAP would be consistent with the type and scale of construction considered in the GP EIR and would be exempt from maximum noise level requirements provided associated construction activities do not take place during the specified hours set forth in County Code section 6.68.090(e), limiting the level of noise exposure to surrounding sensitive receptors.

Strategy Option 3 would not result the development of substantial stationary or transportation noise sources. Further, the GP EIR contemplates long-term operational noise sources associated with increased vehicle noise and Strategy Option 3 would not result in a more severe impact compared to what was evaluated in the GP EIR. Additionally, implementation of Strategy Option 3 would not result in increased exposure to people residing or working in the project area to excessive noise levels because any development would be required to demonstrate consistency with the ALUCP/CLUP that include policies and regulations to address airport noise. Requiring carbon neutral development for UPA expansions would not affect potential for noise impacts because the same types of development and construction activities would occur. Strategy Option 3 would result in noise impacts **similar** to those associated with the proposed CAP.

## POPULATION AND HOUSING

Implementation of Strategy Option 3 would not induce population growth, because the GHG reduction measures do not propose new housing, nor do they propose changes to policies or regulations related to land use or residential zoning. Requiring carbon neutral development for UPA and/or USB expansions would not substantially change the potential for impacts related to unplanned population growth or displacement of housing. However, by establishing an additional requirement for development outside of the UPA and/or USB, it could discourage growth that would be inconsistent with established planning documents. Overall, the impacts of Strategy Option 3 would be **slightly less** than the proposed CAP.

## PUBLIC SERVICES

Implementation of Strategy Option 3 would not directly affect the provision of public services, nor contribute to population growth that could result in an increase in demand for fire protection and emergency services. Implementation of Strategy Option 3 would not result in facilities that would be substantially different or in areas that are different from those identified in the

General Plan. Strategy Option 3 would result in impacts to public services that are **similar** to the proposed CAP.

## RECREATION

Implementation of Strategy Option 3 would not directly affect the provision of park and recreation facilities, nor contribute to population growth that could increase the use of existing park and recreation facilities resulting in the physical deterioration of such facilities. Strategy Option 3 would result in recreation impacts that are **similar** to the proposed CAP.

## TRANSPORTATION

Strategy Option 3 would include the same GHG reduction measures as the proposed CAP, including those intended to reduce VMT. As described for the CAP, subsequent development projects would be subject to all applicable County guidelines, standards, and specifications related to transit, bicycle, or pedestrian facilities. To achieve carbon neutrality, new development outside of the UPA and/or USB would include additional measures, which could include additional investments in transportation infrastructure to further reduce VMT. Due to this requirement, it is anticipated that Strategy Option 3 would result in **less** transportation impacts than the proposed CAP.

## UTILITIES AND SERVICE SYSTEMS

Implementation of Strategy Option 3 would not result in the relocation or construction of new or expanded utility services systems because implementation of GHG reduction measures would not involve development of residential communities or other similar types of development or induce population growth in an area that would increase demand for expanded utility services. As discussed for the proposed CAP, proposed measures would also improve water efficiency by formally adopting a water reduction target for new and existing buildings and replacing water-wasting equipment. In addition, implementation of the GHG reduction measures would promote clean energy and sustainable resource management by supporting future EV infrastructure, transit access improvements, and solar for county buildings.

To achieve carbon neutrality, new development outside of the UPA and/or USB would include additional measures to further reduce GHG emissions. This could result in reduced demand for utilities and service systems for new development. Overall, Strategy Option 3 would result in **slightly less** impact than the proposed CAP.

## WILDFIRE

Strategy Option 3 includes the same GHG reduction and resilience measures as the CAP, plus an additional measure that would require proposed new development outside of the UPA and/or USB to demonstrate carbon neutrality. Requiring carbon neutral development for UPA and/or USB expansions would not affect potential for wildfire impacts. Strategy Option 3 would result in impacts **similar** to those associated with the proposed CAP.

## 4.4 STRATEGY OPTION 4: ADAPTATION-FOCUSED CLIMATE ACTION PLAN

The CAP's GHG forecast shows that the County is already on track to meet the 2020 General Plan target and a 2030 GHG target aligned with California's SB 32 target and the 2017 Scoping Plan without further action. Under Strategy Option 4 the County would proceed with a CAP that focuses exclusively on adapting to the anticipated effects of climate change. The adaptation-focused approach would be based on the vulnerability assessment and would not adopt additional GHG reduction measures. Instead, the GHG reduction measures would be reported in an appendix for use if periodic re-inventorying of GHG emissions shows that the target is no longer met and additional reductions are necessary. This would retain the CEQA streamlining function of the CAP.

Community and Municipal GHG reduction strategies currently contained in Section 2 would be moved from the main CAP document and placed into an appendix. The Climate Change Adaptation strategy in Section 3 and associated implementation measures in Section 4 would remain in the main CAP document to comprise the County's primary strategy for addressing climate change. Options for GHG reduction plans and programs contained in the appendix could then be considered for implementation on a case-by-case basis, contingent on the availability of staffing and funding. This strategy option would not position the County to achieve the Climate Emergency Resolution's goal of carbon neutrality by 2030. This strategy option would be consistent with the County's adopted General Plan and climate change mitigation described in the GP EIR. The adopted General Plan specifies that the CAP must work toward a 2020 GHG reduction goal but does not mention 2030. General Plan Policy LU-115, which was added in response to GP EIR Mitigation Measure CC-1 states "it is the goal of the County to reduce greenhouse gas emissions to 1990 levels by the year 2020. This shall be achieved through a mix of State and local action". A 2020 target for GHG emissions was further discussed in a first-phase CAP adopted by the County in 2011 in compliance with GP EIR Mitigation Measure CC-2. The second-phase CAP now under consideration is required by Mitigation Measure CC-2 to contain information on measures and programs, timelines, economic analyses, and estimated reductions. This information would be included as part of the GHG reduction measure options contained in an appendix for the CAP.

### 4.4.1 Comparative Evaluation of Impacts

Strategy Option 4 would include only the resilience measures from the proposed CAP related to adaptation to extreme heat, wildfire, drought, flooding, and sea level rise. The potential for physical environmental effects associated with these strategies would be limited. The measures could result in the upgrade of existing critical infrastructure to improve resilience to heat or flooding and the revegetation of bare and disturbed areas. Most of the measures, however, center around partnerships and existing information programs, as well as incentivizing the use of green building techniques. As discussed further below, implementation of this strategy option would not result in new or substantially more severe impacts than anticipated in the GP EIR.

## AESTHETICS

Strategy Option 4 would include all the same resiliency measures as the proposed CAP. Implementation of these policies could result in circumstances requiring construction activities

or equipment, such as use of a tall crane, that could temporarily introduce substantial height, bulk, mass, or lighting within a scenic vista. Because these circumstances would be rare and the duration would be limited to relatively short periods of the overall construction phase, the temporary effect on scenic vistas would not be substantial. In addition, given the nature of the resiliency measures, construction activities associated with their implementation would generally occur in already disturbed, urbanized developed areas associated with established infrastructure.

Implementation of Strategy Option 4 also would result in the use of temporary lighting sources during construction of roadway improvement projects. Enforcement of the Zoning Code would regulate new sources of light and glare to avoid affecting day or nighttime views. For example, Title III requires that lighting be directed away from residential areas and public streets so that glare is not produced that could impact the general safety of vehicular traffic and the privacy and well-being of residents. Overall, the aesthetic impacts of Strategy Option 4 would be **similar** to the proposed CAP.

## AGRICULTURAL AND FOREST RESOURCES

Strategy Option 4 would not include the GHG reduction measures most likely to result in conversion of, or incompatibility with, agricultural resources. Ground disturbance required to implement the adaptation measures would be generally limited to improving the resilience of existing infrastructure.

Strategy Option 4 does not propose development that would cause incompatible land uses, convert of Important Farmland to nonagricultural use, or reduce Williamson Contract acreage. Minor land conversions may be required for infrastructure necessary to implement CAP policies. Upgraded infrastructure is generally considered compatible with agricultural uses, and all subsequent projects would be subject to the requirements of the applicable zoning code. Mitigation measures identified in the GP EIR and in the 2019 Agricultural Element Update would apply to subsequent projects and minimize potential for future loss of Important Farmland or Farmland under Williamson Act Contract. The impacts of Strategy Option 4 would be **similar** to the proposed CAP.

## AIR QUALITY

Like the proposed CAP, implementation of Strategy Option 4 would not increase air quality emissions such that they would exceed SMAQMD standards beyond what was considered in the GP EIR. CAP measures that would result in improving, updating, bolstering, relocating, or upgrading the County's infrastructure or facilities to proactively prepare for future impacts from climate change such as increased flooding, sea level rise, extreme heat, and wildfire may generate criteria air pollutant emissions as a result of the use of construction equipment, additional truck hauling trips, and increased worker vehicle trips. Occasional maintenance activities would be minimal or accomplished with existing personnel and in conjunction with established maintenance activities.

Strategy Option 4 would not result in the minimal, short-term air quality concerns associated with the construction of infrastructure to support the proposed GHG reduction measures but would also not realize the long-term air quality benefits of implementing these measures. Overall, the impacts of Strategy Option 4 on air quality would be **similar** to the proposed CAP.



## BIOLOGICAL RESOURCES

Strategy Option 4 would have less potential to affect biological resources because there would be no construction of infrastructure to support the proposed adaptation measures. Upgrade of existing infrastructure would be required to comply with existing federal, State, and local regulations and policies, as well as the SSCHP for projects located in the SSHCP plan area. These activities would also be consistent with General Plan Policies CO-58, CO-59, CO-61, CO-75, CO-76, and CO-78. Overall, the impact of Strategy Option 4 on biological resources would be **slightly less** than the proposed CAP.

## CULTURAL RESOURCES

Strategy Option 4 would not include the GHG reduction measures most likely to result in alteration of historic resources or disturbance of archaeological resources. Ground disturbance required to implement the adaptation measures would be generally limited to improving the resilience of existing infrastructure. Impacts to cultural resources would be **less** than the proposed CAP.

## ENERGY

Strategy Option 4 would not include the GHG reduction measures from the proposed CAP. As a result, Strategy Option 4 could result in unnecessary consumption of energy resources. Overall, the impact of Strategy Option 4 on energy use would be **more** compared to the proposed CAP.

## GEOLOGY AND SOILS

Strategy Option 4 would establish a climate adaptation strategy for the County. Projects required to implement this strategy may include upgrading critical infrastructure and revegetation of bare and disturbed areas. These actions would decrease potential for erosion and would be required to comply with provisions for geological stability established by the UBC and CBC. In addition, Strategy Option 4 would not amend, revise, or be inconsistent with any existing regulations related to geology and soils. Overall, the impacts of Strategy Option 4 on geology and soils would be **similar** to the proposed CAP.

## GREENHOUSE GAS EMISSIONS

Strategy Option 4 would establish a climate adaptation strategy for the County without an associated GHG reduction strategy. While this could result in greater GHG emissions than with implementation of the CAP, Strategy Option 4 would not conflict with any applicable plans or regulations because the County is projected to meet established State targets without additional measures. Overall, the impact of Strategy Option 4 on GHG emissions would be **slightly more** than the proposed CAP.

## HAZARDS AND HAZARDOUS MATERIALS

Strategy Option 4 would include the resiliency measures evaluated for the proposed CAP. These activities would be consistent with General Plan Polices HM-4, HM-7, HM-11, and HM-14 and would be required to comply with federal, State, and local regulations. As described in the GP EIR, compliance with these regulations is anticipated to substantially avoid the release of hazardous materials associated with routine use and disturbance of hazardous materials. Strategy Option 4 would not amend, revise, or be inconsistent with any existing regulations related hazards and hazardous materials. Impacts would be **similar** to the proposed CAP.

## HYDROLOGY AND WATER QUALITY

Implementation of Strategy Option 4 would not violate water quality standards or waste discharge requirements because the CAP would not result in ground-disturbing activities that would substantially contribute to soil erosion or water quality issues. As discussed for the proposed CAP, activities would be consistent with General Plan Polices CO-24, CO-27, CO-28, CO-29, CO-30, CO-31, and CO-32 and would be required to comply with the Sacramento County Stormwater Ordinance (Sacramento County Code 15.12), Land Grading and Erosion Control Ordinance (Sacramento County Code 16.44), as well as implementation of an Erosion and Sediment Control Plan, BMPs, and NPDES requirements. Implementation of Strategy Option 4 would not decrease water supply or increase the rate or amount of runoff because it does not include projects that would substantially increase impervious surfaces or require the use of groundwater. Impacts would be **similar** to the proposed CAP.

## LAND USE AND PLANNING

Strategy Option 4 would not physically divide an established community or conflict with an adopted land use plan. Removing the GHG reduction strategy from the CAP would not affect potential for impacts to land use and planning as the same land areas would be potentially developed. Overall, the impacts of Strategy Option 4 on land use and planning would be **similar** to the proposed CAP.

## MINERAL RESOURCES

Implementation of Strategy Option 4 could result in improvements to infrastructure within the County to improve resilience to heat and flooding as a result of climate change. These activities would be consistent with General Plan Policies CO-38 and CO-44. Removing the GHG reduction strategy from the CAP would not affect potential for impacts to mineral resources as the same land areas would be potentially developed. Overall, the impacts of Strategy Option 4 on mineral resource availability would be **similar** to the proposed CAP.

## NOISE

Strategy Option 4 would have a limited scope compared to the proposed CAP. Because the GHG reduction strategy would be removed, there would be less potential for construction noise. However, the construction of infrastructure would be consistent with the type and scale of construction considered in the GP EIR and would be exempt from maximum noise level requirements provided associated construction activities do not take place during the specified

hours set forth in County Code section 6.68.090(e), limiting the level of noise exposure to surrounding sensitive receptors. Strategy Option 4 would not result the development of substantial stationary or transportation noise sources or increased exposure to people residing or working in the project area to excessive noise levels because any development would be required to demonstrate consistency with the ALUCP/CLUP that include policies and regulations to address airport noise. Overall, Strategy Option 4 would result in **similar** noise impacts to those associated with the proposed CAP.

## POPULATION AND HOUSING

Implementation of Strategy Option 4 would not induce population growth because the climate change adaptation strategy does not propose new housing or changes to policies or regulations related to land use or residential zoning. Strategy Option 4 would result in population and housing impacts **similar** to those associated with the proposed CAP.

## PUBLIC SERVICES

Implementation of Strategy Option 4 would not directly affect the provision of public services, nor contribute to population growth that could result in an increase in demand for fire protection and emergency services. Therefore, implementation of Strategy Option 4 would not result in the construction of new public services facilities that could have substantial adverse physical impacts. Further, future projects would be required to comply with General Plan policies related to adequate fire public services. Strategy Option 4 would result in impacts to public services that are **similar** to the proposed CAP.

## RECREATION

Implementation of Strategy Option 4 would not directly affect the provision of park and recreation facilities, nor contribute to population growth that could increase the use of existing park and recreation facilities resulting in the physical deterioration of such facilities. Strategy Option 4 would result in recreation impacts that are **similar** to the proposed CAP.

## TRANSPORTATION

Strategy Option 4 would not include the GHG reduction strategy, which includes measures intended to reduce VMT. As described for the CAP, subsequent development projects under the CAP would be subject to all applicable County guidelines, standards, and specifications related to transit, bicycle, or pedestrian facilities. Overall, the transportation impacts of Strategy Option 4 would be **more** than the proposed CAP.

## UTILITIES AND SERVICE SYSTEMS

Strategy Option 4 includes the climate adaptation strategy from the proposed CAP, which could result in the relocation or upgrade of existing critical infrastructure identified as vulnerable to extreme heat, flooding, or other adverse conditions as a result of climate change. These types of modifications would be within the scope of the improvements evaluated in the GP EIR. Implementation of Strategy Option 4 would not involve development of residential

communities or other similar types of development or induce population growth in an area that would increase demand for expanded utility services. Strategy Option 4 would result in impacts that are **similar** to the proposed CAP.

## WILDFIRE

Development required to implement Strategy Option 4 would be limited and would not increase the exposure of people or structures to significant wildfire hazards or exacerbate fire risk. Although Strategy Option 4 could result in various infrastructure improvements, it would not introduce people to the area, substantially increase the potential for wildfire, or result in substantial changes to drainage and flooding due to post-fire instability. Strategy Option 4 would result in impacts that are **similar** to the proposed CAP.

## 4.5 SUMMARY

The strategy options evaluated above would modify the CAP to add or remove GHG reduction measures. These changes would not result in substantially more severe effects on the environment. As summarized in Table 4.5-1, below, the impact of implementing any one of the four strategy options is anticipated to be similar to the proposed CAP for most resource areas.

Strategy Options 1 and 3 may reduce several impacts due to the more compact development patterns that may result from the emphasis on urban infill development and additional requirements for development outside of the UPA and/or USB, respectively, in these strategy options. Strategy Option 2, which adds measures in response to the Board of Supervisor's Climate Emergency Resolution, would result in similar impacts as the proposed CAP. With Strategy Option 4, the County would proceed with a CAP that focuses on an adaptation-focused approach based on the expected impacts of the vulnerability assessment but would not adopt additional GHG reduction measures; as a result, transportation and energy impacts may be greater than with implementation of the proposed CAP.

**Table 4.5-1  
Comparative Impact Summary for CAP Strategy Options**

Resource	GP EIR Conclusion	GP EIR Conclusion with CAP	Relative Impact Compared to Proposed CAP (less, same, more)			
			Strategy Option 1: Infill Development	Strategy Option 2: Carbon Neutrality	Strategy Option 3: Carbon Neutral New Development	Strategy Option 4: Adaption CAP
Aesthetics	SU	SU	Similar	Similar	Similar	Similar
Agricultural and Forest Resources	SU	SU	Slightly less	Similar	Similar	Similar
Air Quality	SU	SU	Similar	Slightly less	Slightly less	Similar
Biological Resources	SU	SU	Slightly less	Similar	Similar	Slightly less
Cultural Resources	SU	SU	Slightly more	Similar	Similar	Less
Energy	LTS	LTS	Less	Similar	Slightly less	More
Geology and Soils	SU	SU	Similar	Similar	Similar	Similar
Greenhouse Gas Emissions	SU	LTS	Slightly Less	Less	Less	Slightly more
Hazards and Hazardous Materials	LTS	LTS	Similar	Similar	Similar	Similar
Hydrology and Water Quality	SU	SU	Slightly less	Similar	Similar	Similar
Land Use and Planning	LTS	LTS	Slightly less	Similar	Similar	Similar
Mineral Resources	SU	SU	Slightly less	Similar	Similar	Similar
Noise	SU	SU	Similar	Similar	Similar	Similar
Population and Housing	LTS	LTS	Similar	Similar	Slightly less	Similar
Public Services	LTS	LTS	Similar	Similar	Similar	Similar
Recreation	LTS	LTS	Similar	Similar	Similar	Similar
Transportation	SU	SU	Slightly less	Similar	Less	More
Utilities and Service Systems	SU	SU	Slightly less	Slightly less	Slightly less	Similar
Wildfire	Not Analyzed	LTS (CAP conclusion only)	Similar	Similar	Similar	Similar

Source: compiled by Ascent Environmental in 2021

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