SFPP Bradshaw Terminal Renewable By Rail Project

Draft IS/MND

SFPP Kinder Morgan

10 June 2022

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June 10, 2022

Executive Summary

Lead Agency: City of Rancho Cordova, California

Project Proponent: SFPP Kinder Morgan

Project Location: 3009 Bradshaw Road, Sacramento, CA 95827

Project Description:

SFPP, L.P. (SFPP), a subsidiary of Kinder Morgan, proposes to expand its Bradshaw Terminal to allow for renewable diesel (RD) and biodiesel operations. The SFPP Bradshaw Terminal Renewable By Rail Project (Project) would include new rail infrastructure at Bradshaw Terminal and within the existing Sacramento Regional Transit (SacRT) and Union Pacific Railroad (UPRR) rail corridor. Within the existing rail corridor, a new rail runaround would be installed to spot approximately 22 railcars on SacRT right-of-way for railcar delivery purposes.

Within the Bradshaw Terminal, the Project would have approximately 22 railcar storage/offload locations with rail spots dedicated for biodiesel and RD offloading. The rail system would be able to offload approximately 20,000 barrels per day (bpd) of total product to include 1,240 bpd of biodiesel. With the proposed Project, the Bradshaw Terminal would normally receive one (1) rail delivery per day, up to 5 days per week (M-F).

The Project would also include a new 80,000-barrel (bbl) RD storage tank and a new insulated biodiesel tank with approximately 15,000-bbl working capacity. Both tanks would be installed within the existing secondary containment area; however, the containment area would be modified slightly for the new volumes.

Additionally, the Project would include a new two-lane truck blending and loading rack. The truck rack would be capable of blending biodiesel with CARB diesel or RD. Truck loading may to take place up to 7 days per week. The Project's proposed fuel throughput would result in 112 new truck loads per day, for 224 new truck trips per day.

Public Review Period: June 10, 2022, to July 11, 2022

Mitigation Measures Incorporated into the Project to Avoid Significant Effects

Mitigation measures are identified in Table ES-1.

Table ES-1 Mitigation Measures Incorporated into the Project

Mitigation Measures (MM)	Timing / Implementation	Enforcement / Monitoring
MM BIO-1: Prevent Disturbance to Nesting Birds If work must be performed during the avian nesting season (February 1 – September 1), the Applicant shall ensure that a pre-construction nesting bird survey is performed in areas within 500 feet of Project-related construction activities no more than 7 days prior to ground disturbance. If active nests are found, an appropriately sized no-disturbance buffer shall be placed around the nest at the direction of a qualified biologist conducting the survey. Active nests shall be monitored at least once per week to determine whether birds are being disturbed. Activities that might, in the opinion of the qualified biologist, disturb nesting activities (e.g., excessive noise), shall be prohibited within the buffer zone until such a determination is made. If signs of disturbance or distress are observed, the qualified biologist shall implement adaptive measures to reduce disturbance. These measures may include, but are not limited to, increasing buffer size, halting disruptive construction activities in the vicinity of the nest until fledging is confirmed or nesting activity has ceased, placement of visual screens or sound dampening structures between the nest and construction activity, reducing the number of noisy construction activities occurring simultaneously, and/or reorienting and/or relocating construction equipment to minimize noise at noise-sensitive receptors. Buffers shall remain in place until all young have fledged, or the biologist has confirmed that the nest has been naturally predated. If ground disturbance work lapses for seven days or longer during the nesting season, a qualified biologist shall conduct a supplemental avian pre-construction survey before Project work is reinitiated.	Prior to Project construction	City of Rancho Cordova and qualified biologist working for Project Applicant
MM CR-1: Archaeological Inadvertent Discovery Procedures The Applicant shall ensure the following procedures are followed. If archaeological materials are encountered during initial ground-disturbing activities, work within 25 feet of a discovery shall be halted until a qualified archaeologist assesses the find, consults with the appropriate tribes and agencies, and makes recommendations for the treatment of the discovery to protect the integrity of the resource and ensure that no additional resources are affected. Upon completion of the assessment, the archaeologist shall prepare a report to document the methods and results of the assessment. The report shall be submitted to the City, appropriate tribes, and the North Central Information Center upon completion. Following initial ground disturbance, in the event that any subsurface archaeological features or deposits, including locally darkened midden soil, are discovered during later construction-related earth-moving activities, all ground-disturbing activity in the vicinity of the resource shall be halted, a qualified professional archaeologist shall be retained to evaluate the find, and the appropriate tribal representative(s) shall be notified. If the find qualifies as a historical resource, unique archaeological resource, or tribal cultural resource as defined by CEQA, the archaeologist, in consultation with tribes, shall develop appropriate measures to protect the integrity of the resource and ensure that no additional resources are affected. In considering any suggested measures proposed by the consulting archaeologist in order to mitigate impacts to historical resources or unique archaeological resources, the City, in consultation with applicable Native American tribes, shall	During Project construction	City of Rancho Cordova and qualified archaeologist working for Project Applicant

Mitigation Measures (MM)	Timing / Implementation	Enforcement / Monitoring
determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, project design, costs, and other considerations. If avoidance is infeasible, other appropriate measures (e.g., data recovery, reburial at another location within the site) shall be instituted. Work may proceed on other parts of the Project while mitigation for unique archaeological resources is being carried out.		
MM CR-2: Protect Human Remains If Encountered during Construction The Applicant shall ensure the following measures are implemented to protect human remains. If human remains, associated grave goods, or items of cultural patrimony are encountered during construction, work shall halt in the vicinity of the find and the County Coroner shall be notified immediately. The following procedures shall be followed as required by Public Resources Code § 5097.9 and Health and Safety Code § 7050.5. If the human remains are determined to be of Native American origin, the Coroner shall notify the Native American Heritage Commission within 24 hours of the determination. The Native American Heritage Commission shall then notify the Most Likely Descendant (MLD). The MLD shall complete an inspection and make its MLD recommendation for disposition of the remains within 48 hours of receiving access to the site. The Applicant and the MLD shall make all reasonable efforts to develop an agreement for the treatment, with appropriate dignity, of any human remains and associated or unassociated funerary objects. Said determination may include avoidance of the human remains, reburial on-site, or reburial on tribal or other lands that will not be subject to future. Any reburial of human remains shall be accomplished in compliance with the California Public Resources Code Sections 5097.98(a) and (b). Unless otherwise required by law, the site of any reburial of Native American human remains shall not be disclosed.	During Project construction	City of Rancho Cordova, Project Proponents, Sacramento County Coroner, NAHC
MM GEO-1: Protect Paleontological Resources during Construction Activities In the event that fossils are encountered during construction (i.e., bones, teeth, or unusually abundant and well-preserved invertebrates or plants), construction activities shall be diverted away from the discovery within 50 feet of the find and a professional paleontologist shall be notified to document the discovery as needed to evaluate the potential resource and to assess the nature and importance of the find. Based on the scientific value or uniqueness of the find, the paleontologist may record the find and allow work to continue or recommend salvage and recovery of the material if it is determined that the find cannot be avoided. The paleontologist shall make recommendations for any necessary treatment that is consistent with currently accepted scientific practices. Any fossils collected from the area shall then be deposited in an accredited and permeant scientific institution where they will be properly curated and preserved.	During Project construction	City of Rancho Cordova and qualified paleontologist working for Project Applicant
MM HAZ-1: Soil Characterization and Management during Construction The Applicant shall complete the following requirements prior to the start of construction: – A Sampling Analysis Plan (SAP) shall be prepared to define sample locations, boring depths based upon design, estimated soil volumes, and number of borings to adequately pre-characterization Project area soils. The SAP shall include pre-characterization of soil for potential constituents of concern (COCs), and shall include an assessment of CAM-17 metals and petroleum hydrocarbons prior to initiating	Prior to Project construction	City of Rancho Cordova

Mitigation Measures (MM)	Timing / Implementation	Enforcement / Monitoring
construction activities. The SAP shall further include specifications for surficial samples that will be collected to the proposed depth of excavation in the areas where ground disturbing activities are proposed. – Prior to construction of the Project, pre-characterization shall be conducted at SAP identified locations of planned ground disturbance for worker protection and waste characterization. – If pre-characterization analysis results determine COCs above regulatory background thresholds for human and environmental health exposure, then a site-specific Soil Management (SMP) shall be prepared to address proper handling of potentially impacted soil prior to waste stream characterization, proper disposal, and handling requirements for worker protection. The SMP shall proactively plan for and manage potentially encountered hazardous materials affected soils, and to provide special soil handling and stockpiling details throughout the Project Area construction areas for worker protection, final waste disposal purposes and to mitigate potential Project construction delays. The SMP shall indicate the specific level of any protection required for construction workers and include preparation of a site-specific health and safety plan in accordance with federal OSHA regulations (29 CFR 1910.120) and Cal-OSHA regulations (8 CCR Title 8, Section 5192) to address worker health and safety issues during construction. – A Soil Excavation, Stockpiling and Transportation Plan (SESTP) shall be prepared once the areas of Project ground disturbance are confirmed and prior to construction. The SESTP will specify measures to appropriately manage soil spills during Project construction for waste characterization, worker protection, fugitive emissions control and disposal. Alternatively, soil spoils can be initially field screened (visual, olfactory, photo-ionization detector, etc.) and stockpiled, then subsequently characterized for appropriate disposal methods according to applicable waste facility requirements. – All potentially contaminated materials encountered during Project construction activities shall be evaluated in the context of applicable local, state and federal regulations and/or guidelines governing hazardous waste. All materials deemed to be hazardous shall be remediated and/or disposed of following applicable regulatory agency regulations and/or guidelines. Disposal sites for both remediated and non-remediated soils shall be identified prior to beginning construction. Management of these sites shall be documented in a Material Management Plan acceptable to applicable agencies. All evaluation, remediation, treatment, and/or disposal of hazardous waste shall be supervised and documented by qualified hazardous waste personnel.		
MM HAZ-2: Reduce Wildland Fire Hazards during Construction Prior to construction, the Applicant and its contractor(s) shall remove and/or clear away dry, combustible vegetation from the construction site. Grass and other vegetation less than 18 inches in height above the ground shall be maintained where necessary to stabilize the soil and prevent erosion. Vehicles shall not be parked in areas where exhaust systems contact combustible materials. Fire extinguishers shall be available on the construction site to assist in quickly extinguishing any small fires, and the contractors shall have on site the phone number for the local fire department.	Prior to and during Project construction	City of Rancho Cordova and contractors working for Project Applicant

Mitigation Measures (MM)	Timing / Implementation	Enforcement / Monitoring
MM TR-1: Tribal Inspection of Subsurface Soils To accommodate any necessary security clearance, no less than five working days before the start of construction, the contractor shall notify the Wilton Rancheria Cultural Preservation Department about the start date of ground disturbing activities. The tribe will be given the opportunity to send a tribal monitor to inspect the subsurface soils once during the first five days of ground disturbing activity on the project. Should the tribe choose not to send a monitor to perform the inspection within the first five days, work can continue as long as the notice was provided and documented.	Prior to and during Project construction	City of Rancho Cordova and contractors working for Project Applicant

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1. Background

Project Title	SFPP Bradshaw Terminal Renewable By Rail Project
Lead Agency Name & Address	City of Rancho Cordova Planning Department 2729 Prospect Park Drive Rancho Cordova, CA 95670
Contact Person & Phone Number	Darcy Goulart, Planning Manager (916) 851-8784
Project Owner	SFPP Kinder Morgan
Project Location	The Project occurs within portions of the existing approximately 27.6-acre Bradshaw Terminal within APNs 068-0160-100 and 068-0160-099 located at the southeast corner of Folsom Boulevard and Bradshaw Road, in the City of Rancho Cordova. The Project also occurs within portions of the existing Sacramento Regional Transit (SacRT) right of way within APNs 068-0160-001, 077-0010-001, and 077-0010-020 located south of and adjacent to Folsom Boulevard between Routier Road and Bradshaw Road.
General Plan Land Use Designation	FBPA (Folsom Boulevard Planning Area)
Zoning	OIMU (FBSP), Office Industrial Mixed Use/Folsom Boulevard Specific Plan. T FBSP (Transportation Corridor/Folsom Boulevard Specific Plan)

1.1 Introduction and CEQA Requirements

The City of Rancho Cordova (City), serving as the California Environmental Quality Act (CEQA) Lead Agency, has prepared this Initial Study to provide the public, responsible agencies, and trustee agencies with information about the potential environmental effects of the SFPP Bradshaw Terminal Renewable By Rail Project (Project).

The purpose of this Initial Study is to provide a basis for deciding whether to prepare an Environmental Impact Report, a Mitigated Negative Declaration, or a Negative Declaration. This Initial Study is intended to satisfy the requirements of the CEQA, (Public Resources Code, Div 13, Sec 21000-21177), and the State CEQA Guidelines (California Code of Regulations, Title 14, Sec 15000-15387). CEQA encourages lead agencies and applicants to modify their projects to avoid significant adverse impacts.

Section 15063(d) of the State CEQA Guidelines states the content requirements of an Initial Study as follows:

1. A description of the project including the location of the project;
2. An identification of the environmental setting;

3. An identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries;
4. A discussion of the ways to mitigate the significant effects identified, if any;
5. An examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls;
6. The name of the person or persons who prepared or participated in the Initial Study.

1.2 Project Background and Objectives

SFPP Kinder Morgan operates the existing Bradshaw Terminal located in Sacramento, California. The terminal currently receives refined petroleum, biodiesel and blending products through pipelines and trucks for storage and distribution. The objective of this Project is to increase the terminal's renewable products throughput by designing and constructing a new renewable and bio diesel railcar unloading system, storage tanks, and truck loading systems.

1.3 Project Location and Existing Setting

Project Sites

The Project would occur within the existing Bradshaw Terminal and Sacramento Regional Transit (SacRT) Right of Way (ROW), also called the 'Rail Run-around site'. See Figure 1-1 for the general Project locations. Specifically, new rail infrastructure and a truck turnaround would be constructed on approximately 6 acres of the eastern portion of the existing Bradshaw Terminal, two new diesel storage tanks would be constructed within the existing northern containment berm adjacent to existing tanks, surface improvements and a new truck loading rack would be installed within the southern portion of the site, and new above and below ground piping would connect the proposed new infrastructure. Within the SacRT ROW a new 0.45-mile rail runaround would be constructed adjacent to the existing UPRR rail line.

Surrounding Land uses

Bradshaw Terminal Site

To the east of the Bradshaw Terminal site is an office park. To the south are additional tank farm facilities with a public gas station, additional office uses, and US Highway 50 (US 50) beyond. To the west are commercial and recreational uses beyond Bradshaw Road. To the north are the SacRT and UPRR rail lines and Folsom Boulevard. Beyond Folsom Boulevard are existing commercial uses and a residential neighborhood. See Figure 2, Bradshaw Terminal.

Bradshaw Road has existing Class II bike lanes on both sides from Folsom Boulevard to the US 50 westbound ramps. Bradshaw Road has sidewalks along both sides; however, the sidewalk is not continuous along the east side of the road. Pedestrian facilities are missing for approximately 330 feet between Folsom Boulevard & Gore Road and between Gore Road & Business Park Drive. There are no bus stops on Bradshaw Road within 0.5 mile of the Bradshaw Terminal site.

Folsom Boulevard has existing Class II bike lanes on and continuous sidewalks on both sides from Bradshaw Road to Routier Road. There are existing bus stops on Folsom Boulevard just east and west of the Bradshaw intersection. There are no light rail stops within 0.5 mile of the Bradshaw Terminal site.

Rail Run-around Site

To the south and east of the Rail Run-around site are an existing residential neighborhood and an office park. To the east is a residential neighborhood beyond Routier Road. To the north are the SacRT and UPRR rail lines and Folsom Boulevard. Beyond Folsom Boulevard are a residential neighborhood and open space. To the west are continued SacRT and UPRR lines and an office park. See Figure 3, UPRR Rail Run-around.

There are existing bus stops on Folsom Boulevard just east and west of the intersection with Routier Road/La Loma, and just east and west of the intersection with Rod Beaudry Drive. The Mather Field/Mills Station light rail stop is approximately ½ mile east of the Rail Run-around site.

Routier Road has existing Class IV separated bikeways and continuous sidewalks on both sides from Folsom Boulevard to Horn Road. There are no bus stops on Routier Road within ½ mile of the Rail Run-around site.

Environmental Setting

The Project sites are located within the City of Rancho Cordova in the center of the Sacramento Valley in Sacramento County.

The Project sites are located within the Sacramento Valley Air Basin and are under the jurisdiction of the Sacramento Metropolitan Air Quality Management District (SMAQMD). Sacramento County is currently designated as nonattainment for the federal and state ambient air quality standards for ozone, the federal PM2.5 standard, and the state PM10 standard. The county is designated as attainment or unclassified for all other federal and state ambient air quality standards.

The Project sites are located within the Sherman Lake-Sacramento River watershed and Lake Greenhaven subwatershed, with the American River located approximately 0.25 mile north of the Bradshaw Terminal site and 0.20 mile north of the Rail Run-around site. An unnamed open drainage canal is located east of the Bradshaw Terminal and immediately west of the Rail Run-around site, and flows into the American River. The area of proposed improvements is not located within a mapped 100-year or 500-year flood zone (GHD 2022).

The Project area is underlain by the South American Subbasin of the Sacramento Valley Groundwater Basin, which was designated a high priority ranking during the recent groundwater basin prioritization process (DWR 2018).

The Project area is not located within an active Alquist-Priolo earthquake fault zone and no other active or potentially active faults have been mapped within the area. The closest mapped active fault to the sites is the Dunnigan Hills fault zone, located more than 30 miles northwest of the Project (Ninyo & Moore 2021).

Bradshaw Terminal Site

The Bradshaw Terminal is a 35-acre site with approximately 75% of the site developed with a combination of tanks, equipment, gravel, and pavement. The remaining portion of the site is undeveloped with an open ditch in the middle of the field. Existing structures include 16 petroleum product tanks, 3 truck loading racks, associated piping and pumps, office and control buildings, containment berms, fencing and lighting for safety, and SMAQMD-permitted air emissions control equipment.

Existing tanks are 40 feet tall, and range from 5,000 to 55,000 barrels per tank, with a total storage capacity of 446,200 barrels. Liquids stored at the site include gasoline, diesel, jet fuel, and ethanol that the site receives from the existing Kinder Morgan's SFPP pipeline. The tanks are surrounded by secondary containment berms, as required by federal and state law.

The Bradshaw Terminal currently operates the facility under a SMAQMD air quality permit. Specifically, the existing facility operates a vapor combustion unit (VCU) and vapor collection system to control vapor from fuels storage and transfer within the facility.

The eastern portion of the Bradshaw Terminal is a large rectangular open field bordered by large trees on the east and an existing 6-foot chain link fence on the west. The Bradshaw Terminal is bordered by a 6-foot-tall chain link fence along the south. Along the site's frontage with Bradshaw Road, the site is bordered by a 7-foot-tall concrete masonry unit (CMU) wall from the northern corner of the site to approximately 210 feet south of the corner, and a 7-foot-tall chain link fence with 3-strand barbed wire for the remainder of the frontage. Existing 24-foot-tall lights are located throughout the site, focused on lighting the existing tanks and loading racks.

The Project site is generally flat with elevations ranging from approximately 64 to 67 feet above mean sea level (Ninyo and Moore 2021). For the most part, drainage flows from east to west across the Project site. The onsite drainage system consists of a series of ditches, pipes, culverts, and inlets that discharges to the City drainage system. The onsite system connects to the City system on Bradshaw Road with a 42-inch pipe. This includes the business park to the east that drains to the Project site.

Direct access to Bradshaw Terminal is provided from Gore Road, which is identified as a private road, and Bradshaw Road, which is identified as an Arterial by the City of Rancho Cordova General Plan. The City of Rancho Cordova General Plan land use designation for the Project site is Folsom Boulevard Planning Area (FBPA). The zoning is Office Industrial Mixed Use/Folsom Boulevard Specific Plan (OIMU [FBSP].)

On-road mobile activity to the site includes light duty autos and truck trips from employees, and heavy-heavy duty truck trips by third party carriers. Third party carriers access the site, load fuels into their tanker trucks at the existing truck loading racks, and deliver fuels to their customers in the region. Paved parking is provided at the control building and warehouse, located on the eastern boundary and northern boundary of the site, respectively.

Rail Run-around Site

The Rail Run-around site is an approximately 1.25-acre portion of the SacRT ROW starting just east of Routier Road and extending approximately 2,620 feet west. See Figure 1-3, UPRR Rail Run-around, for the site location. The Project site is generally flat and located at an elevation of approximately 69 to 75 feet above mean sea level. For the segment adjacent to residential land uses, the site is bordered on the south by an existing wall. The site is dominated by the rail infrastructure for SacRT and UPRR.

SacRT operates the Gold Line lightrail route, with 134 trips per day through the Project area Monday through Friday, 116 trips per day on Saturday, and 94 trains on Sunday and holidays. Lightrail trains operate in the Project area from approximately 4:30 AM to midnight Monday through Friday, 5:30 AM to midnight on Saturday, and 5:30 AM to 10:00 PM on Sunday and holidays.

Additionally, UPRR regularly runs freight trains through the Project area on their rail line. The hours of use and number of trips through the area is variable. Typical train lengths in the area vary from 2,000 feet to 8,000 feet, and run at 10 miles per hour (UPRR 2021). The rail lines have crossing arms with signals at all intersections. As required by Federal Railroad Administration (FRA) regulations, UPRR blows the train horn every time the train enters an intersection.

2. Project Description

The Project involves the construction and operation of new rail infrastructure within the Bradshaw Terminal and SacRT ROW, as well as construction and operation of new storage tanks, a truck loading rack, and associated fueling infrastructure within the Bradshaw Terminal. Project components for each Project site are described in detail below.

2.1 Bradshaw Terminal Improvements

The Project would include new rail spurs, rail offloading structures, storage tanks, fuel blending and loading racks, modifications to existing air pollutant control equipment (also called a Vapor Combustion Unit), new paved vehicle areas, new lighting and fencing, and a modular control building to locate employees closer to rail operations. See Figure 1-4, Bradshaw Terminal Site Plan.

Local operations would require 3-5 new employees at the site to manage operations and maintain Project facilities. A modular office/control building would be installed on the northern portion of the terminal site to locate employees closer to rail operations. It is anticipated that the control building would be approximately 1,000 square feet.

Rail Spurs and Offloading

Two new rail spurs dedicated for Biodiesel and RD offloading would be constructed. The spurs would have a total of 22 railcar storage locations. A culvert would be installed under the proposed rail spurs to maintain existing west to east drainage on the site. A total of approximately 2,135 linear feet of new rail spurs (two separate tracks) would be constructed.

New motorized mobile gangway systems would access the top of each railcar for unloading and for venting. All 22 rail spots would have capability for offloading Renewable Diesel. The systems would be clearly marked and identified for the different products offloading. The biodiesel offloading system would include a valve manifold system to direct product flow to either the existing 5,000 BBL customer dedicated B-7 Biodiesel storage tank or into the proposed new communal storage tank (discussed below). All new above ground biodiesel piping would be heat traced and insulated and the new storage Biodiesel tank would be insulated. Underground piping would be coated and protected by cathodic system.

Containment facilities would include rail drip pans, containment boxes, and a sump tank for the rail offloading equipment.

Ground Storage Tanks

The Project includes construction and operation of two new ground storage tanks within an existing tank farm and secondary containment area. Proposed new storage tanks would consist of:

- 80,000 BBL RD storage tank
- 15,000 BBL Communal Biodiesel storage tank

The existing containment berm would be improved to account for the new storage tanks and ensure appropriate secondary containment volume.

Truck Blending and Loading Racks

The Project would also include a new two-lane truck blending and loading rack (Loading Rack #5), with option of red dye injection. The truck rack would be capable of blending biodiesel with CARB or Renewable Diesel. Both new truck lanes would be capable of blending up to 20 percent Biodiesel with either 80 percent CARB or Renewable Diesel (B5, B10, & B20).

New rack pumps would be installed and be capable of providing up to 10,000 BBLs/day of product throughput to each truck loading lane (total of 20,000 BBLs/day for two lanes).

One lane would be dedicated to a single customer (customer-dedicated lane) while the second lane would be used for communal load outs (communal lane). The customer dedicated lane would have the option of receiving product from either the customer dedicated tank or the communal storage tank. A new piping system would be required from existing pumps to the new truck rack.

Vapor Combustion Unit Modifications (Stationary Source)

Generally, renewable diesel does not off-gas or vaporize like other fuels such as gasoline. The safety data sheets (SDS) for renewable diesel and communication with SMAQMD has confirmed that SMAQMD permits for rail unloading, tanks, and truck loading systems would not be required for the Project. However, there is a potential for Third-party carriers, accessing the site, may have previously hauled gasoline and could potentially return to the site to request and fill their emptied storage tanks with renewable diesel products (also called switch loads). The switching of products would require venting of the residual gasoline vapors to the existing vapor collection system and vapor combustion unit (VCU) during loading of renewable diesel. Because of the potential for switch loads, the Project would include modifications to the existing SMAQMD-permitted vapor collection system and Vapor Combustion Unit (VCU). Modifications include installation of a new Equalization tank, new Detonation Arrester, and modification of the existing VCU stack. Installation includes associated piping, foundations, electrical, and instrumentation for the new modifications.

Interior Traffic Circulation

The Project would include interior traffic circulation improvements to accommodate existing and new truck trips and to provide access to the proposed new truck loading rack. A new interior road extension and truck turnaround would be constructed on the southern portion of the terminal site to accommodate existing and proposed truck movement. A new asphalt paved truck staging area would be installed adjacent to the existing interior terminal road and the proposed new truck loading rack. New asphalt approach and exits would be installed at the proposed truck loading rack.

Lighting and Fencing

The Project would include twenty-five (25) new 24-foot-tall lighting fixtures for increased safety around the proposed ground storage tanks, truck loading rack, and rail offloading area. Light fixtures would be pole-mounted luminaries, and would be hooded and directed down to eliminate light spill.

Additionally, new fencing and gates would be installed at the north and east perimeter of the facility as well as interior portions of the site. Specifically, approximately 2,000 feet of 6-foot-tall chain link fencing with 3-strand barbed wire would be installed along portions of the north boundary and between the new rail spurs and the eastern boundary of the Bradshaw Terminal. Vehicular gates and personnel crash gates would be installed to provide emergency and maintenance access to the site.

Modular Control Building

A new 24’ by 60’ modular office/control building would be installed on the northern portion of the terminal site to locate employees closer to rail operations.

2.2 Rail Run-Around

The Project would require installation of approximately 2,392 linear feet of new rail run-around on SacRT ROW for railcar delivery purposes. The runaround would be designed to accommodate 22 railcars, approximately 60 feet long each, and the necessary merging length. The run-around would be located approximately 14 feet from center of the existing UPRR rail line. An approximately 2,300 linear feet of precast concrete retaining wall would be installed between the southern ROW line and the new run-around track. See Figure 1-5, UPRR Rail Run-around Site Plan.

2.3 Project Construction

Construction of the Project improvements is anticipated to begin in Summer 2022, with the facilities in operation by first quarter 2023. Construction is anticipated to occur up to 5 months.

Anticipated work hours would be 6:00 AM to 8:00 PM Monday through Friday, and 7:00 AM to 8:00 PM on Sundays, consistent with City of Rancho Cordova Municipal Code Section 6.68 (Noise Control) subsection 6.68.090(E). No work or delivery of equipment or materials would take place during non-work hours. Project construction would not include any tree trimming or tree removal. Prior to earth disturbing activities, temporary fencing would be erected to protect existing nearby trees.

Site Access and Staging

Equipment and materials staging would be located within the Bradshaw Terminal. Access for materials delivery is anticipated to be provided from the existing internal driveway to Gore Road. The construction area, including staging and materials laydown areas, would be restricted by existing fencing. Additionally, fencing would be installed around the Rail Run-around site to restrict access by unauthorized persons. Construction workers would park in existing Bradshaw Terminal parking areas or in the staging areas. The contractor may also secure a job site trailer and portable sanitary facilities at the staging area.

Construction Equipment

A variety of construction equipment would be used to build the Project. This would include, but not necessarily be limited to, excavators, backhoes, front end loaders, scrapers, graders, concrete saws, cranes, jackhammers, winches, forklifts, rollers, asphalt road pavers, compactors, air compressors, generator sets, and pneumatic tools. A variety of trucks including cement mixers, haul trucks, and water trucks would also be required. Site preparation, including clearing and grading of portions of the Project as necessary, would require the removal and off-haul of materials. This would include, but not necessarily be limited to, vegetation, concrete, and asphalt and fill.

Bradshaw Terminal Improvement Construction

Minimal earth moving is anticipated at the Bradshaw Terminal site, as the site is flat and underlain with suitable soils. Clearing and grubbing is anticipated at the Bradshaw Terminal rail footprint, with a total of 5.8 acres potentially disturbed, and soils would be balanced onsite to the extent feasible. Installation of the proposed above ground pipeline would include construction of concrete footings along the length of pipe. Concrete foundations would be installed for the new tanks. Asphalt paving activity for the proposed loading

rack drive lanes, truck staging area, and truck turn around area is estimated to cover 2.1 acres. The modular building would be installed on typical pads for chassis beam and ridge beam supports. The modular building would be connected to electrical, potable water, and wastewater infrastructure.

Hydrostatic Testing

After construction of the new tanks, the tanks would be tested to ensure they meet full operational requirements, including seals of working components and tank strength. Piping systems will also be hydrostatically tested to conform to California State Fire Marshal's requirements. Hydrostatic testing would require the use of approximately 3,570,000 gallons of water, which would be discharged into the Sacramento Area Sewer District's facilities under a Temporary Discharge Permit.

Rail Run-around Track Construction

Construction of the run-around track would include site grading, drainage improvements, installing ballast (rock foundation), laying railway sleepers (also known as 'ties'), anchoring the sleepers, and laying steel rail. Construction would include import of an estimated 900 CY of fill soils and 2,300 CY of fill for subballast and ballast.

Ballast is typically compacted by a mini road roller, while sleeper rails and tracks are installed by a railway track construction machine. A precast concrete retaining wall would be installed along the southern boundary of the Rail Run-around site.

2.4 Operation and Maintenance

Site operations, including receipt and unloading of rail cars, and truck loading, would occur during site operational hours. The site currently operates 24/7. The rail system would be able to offload up to 20,000 BPD of product during one shift, 5 Days/Week.

Rail Activity

Project would be delivered to the Project site by UPRR using existing UPRR facilities and the proposed Project rail facilities. Rail activity associated with the Project is characterized as 'on-site' and 'off-site', as detailed below. UPRR rail activity is not subject to City regulations.

On-Site Rail Activity

UPRR would accommodate delivery and pickup to the terminal up to 5 times per week. UPRR would deliver the railcars in the evening. It is anticipated that the railcars may be left on the run-around overnight, and may sit on the run-around 1 day for 5 days per week. The locomotive that would be used would vary based on UPRR availability.

Switching between the rail run-around track and the Bradshaw Terminal rail spurs would take approximately 45 minutes to an hour. Full railcars would enter the rail run-around track from the west going east. Empty railcars would leave the Rail Run-around track from the east towards the west.

Railcars would travel at approximately 10 miles per hour including at all road crossings. Road crossing signals would be triggered 25 seconds prior to the train entering a crossing and the crossing would re-open 50 feet after the train has cleared the crossing. The railcars associated with this Project (22 railcars) is approximately 1,540 feet long. The locomotive would blow the horn every time it enters an intersection in accordance with FRA rules.

UPRR deliveries and pickups would not affect the SacRT commuter rail operations. No past or new safety concerns have been identified at the UPRR and/or SacRT rail operations related to this Project.

Off-Site Rail Activity

RD product is anticipated to arrive from a variety of origins in the Midwest/Southwest. It is not anticipated that the Project would result in new UPRR rail trips from outside of the region; instead, the rail cars required to transport the Project's throughput of RD would be attached to existing rail trips. Additionally, it is not anticipated that any off-site improvements would be required to support rail activity or RD generation. Therefore, activity associated with generating RD or transporting RD into California from out of state is not considered a component of this Project. The rail activity associated with delivering RD from UPRR's main hub in Sacramento is considered a component of this Project.

Renewable Diesel Rail Off-loading, Storage, and Truck Loading

RD and Biodiesel would be offloaded from a nozzle at the bottom of the railcar and transferred into the header system. Offloading pumps would transfer the product through above ground piping to the appropriate storage tank. Product offloading would include containment to capture any drippage or in the event of a spillage. All run-off and drippage contained in the offloading pump pit and the 22 containment boxes are to drain into a sump tank where the fluid would be pumped to the existing Oil Water System (OWS). From the storage tanks, product would be piped to the new truck loading rack. The truck loading rack would be capable of loading up to 20,000 BPD. Therefore, maximum daily throughput is estimated at up to 20,000 BPD and annual throughput is estimated at up to 5.2 million barrels.

On-Road Vehicle Activity

The Project would result in on-road trips from new onsite employees, and from third-party truck (carrier) trips.

Employee Vehicle Activity

The Project's 3-5 new employees would generate 10 daily non-truck trips. Using the existing truck to non-truck trip ratios, total non-truck trip generation under the proposed Project would total up to 32 trips per day.

Vendor Vehicle Activity

Third-party carriers access the Project site, circulate onsite to the truck loading racks, load their trucks, and then exit the site to deliver fuel to their customers. All ingress and egress from the Bradshaw Terminal would occur at the terminal entrance at the intersection of Bradshaw Road and Gore Road. The Project's proposed increase in fuel throughput would result in 112 new truck loads (180 BBL per truck capacity), for 224 new truck trips per day. Third-party truck deliveries are anticipated for customers within the Sacramento Region, with an average trip length of approximately 25 miles.

2.5 Environmental Protection Actions Incorporated into the Project

The Project would abide by the following regulations and industry-accepted Best Management Practices (BMPs) to reduce or avoid potential adverse effects that could result from construction or operation of the Project. These actions are included as part of the Project as Environmental Protection Actions (EPA) to reduce or avoid potential adverse effects that could result from construction or operation of the Project. In addition to these BMPs, mitigation measures are presented in the following analysis sections in Chapter 4, Environmental Analysis, to reduce potentially significant environmental impacts below a level of

significance. Environmental protection actions and mitigation measures, together, would be included in a Mitigation Monitoring Program at the time that the Project is considered for approval.

Environmental Protection Action 1 - Implementation of Geotechnical Design Recommendations

The Project will be designed and constructed in compliance with the site-specific recommendations made in Design Report, Geotechnical Evaluation (Ninyo and Moore 2021). This will include design in accordance with recommendations for excavations, subgrade preparation, access road and rail tracks roadbed, fill material and placement, utility trenching, foundations, and other factors. The geotechnical recommendations will be incorporated into the final plans and specifications for the Project and will be implemented during construction.

Environmental Protection Action 2 – Implementation of Air Quality Control Measures during Construction

To limit dust, criteria pollutants, and precursor emissions associated with the construction activity, the following Sacramento Metropolitan Air Quality Management (SMAQMD) recommended Best Management Practices will be included in construction contract specifications and required during implementation of the Project:

- Water all exposed surfaces two times daily. Exposed surfaces include, but are not limited to soil piles, graded areas, unpaved parking areas, staging areas, and access roads.
- Cover or maintain at least two feet of free board space on haul trucks transporting soil, sand, or other loose material on the site. Any haul trucks that would be traveling along freeways or major roadways should be covered.
- Use wet power vacuum street sweepers to remove any visible trackout mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited.
- Limit vehicle speeds on unpaved roads to 15 miles per hour (mph).
- All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.
- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes [California Code of Regulations, Title 13, sections 2449(d)(3) and 2485]. Provide clear signage that posts this requirement for workers at the entrances to the site.
- Maintain all construction equipment in proper working condition according to manufacturer’s specifications. The equipment must be checked by a certified mechanic and determine to be running in proper condition before it is operated

Environmental Protection Action 3 - Implementation of Construction Stormwater Pollution Prevention Plan

The Project will seek coverage under State Water Resources Control Board (Water Board) Order No. 2009-0009-DWQ, Waste Discharge Requirements for Discharges of Storm Water Runoff Associated with Construction and Land Disturbance Activities. The City will submit permit registration documents (notice of intent, risk assessment, site maps, SWPPP, annual fee, and certifications) to the Water Board. The SWPPP

will address pollutant sources, best management practices, and other requirements specified in the Order. The SWPPP will include erosion and sediment control measures, and dust control practices to prevent wind erosion, sediment tracking, and dust generation by construction equipment. A Qualified SWPPP Practitioner will oversee implementation of the Project SWPPP, including visual inspections, sampling and analysis, and ensuring overall compliance.

Environmental Protection Action 4 - Implementation of Industrial Stormwater Pollution Prevention Plan

SFPP Kinder Morgan will seek to update the existing facility's Industrial Storm Water NPDES permit which controls pollutants in storm water discharges during Project operations. The Industrial SWPPP identifies storm water drainage patterns, discharge locations, and potential sources of storm water pollution and includes site-specific BMPs that must be implemented to prevent storm water pollution. A dedicated Pollution Prevention Team is responsible for compliance with the requirements of the Industrial General Permit through proper implementation of the Industrial SWPPP.

Environmental Protection Action 5 – Revision and Implementation of Existing Spill Prevention, Control, and Countermeasure Plan

SFPP Kinder Morgan will update the existing Spill Prevention, Control, and Countermeasure (SPCC) Plan that covers the existing facility to include the new facility improvements and operation on the Bradshaw Terminal. A change in the design, construction, operation, or maintenance that may affect the facility's potential for discharge oil requires a technical amendment of the Plan pursuant to the requirements of 40 CFR Part 112.5. The SPCC defines the spill prevention, control, and countermeasures for the facility and to assist Facility personnel by addressing: personnel, training and spill prevention procedures; inspections and records; facility drainage; bulk storage containers and operational equipment; transfer operations, pumping, and in-plant processes; tank truck loading/unloading; and security.

Environmental Protection Action 6 - Implementation Construction Noise Best Management Practices

The Project will incorporate the following best management practices would reduce construction noise levels emanating from the site, limit construction hours and minimize disruption and annoyance:

- Construction activities shall be limited to the hours between 6:00 am and 8:00 pm, Monday through Friday, 7:00 am and 8:00 pm on weekends.
- Construct solid plywood fences around construction sites adjacent to operational business, residences, or other noise-sensitive land uses.
- Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.
- Locate stationary noise-generating equipment such as air compressors or portable power generators as far as possible from sensitive receptors. Construct temporary noise barriers to screen stationary noise-generating equipment when located near adjoining sensitive land uses.
- Utilize "quiet" air compressors and other stationary noise sources where technology exists.
- Control noise from construction workers' radios to a point where they are not audible at existing residences bordering the Project site.

- Notify all adjacent business, residences, and other noise-sensitive land uses of the construction schedule, in writing, and provide a written schedule of “noisy” construction activities to adjacent land uses and nearby residences.
- If complaints are received or excessive noise levels cannot be reduced using the measures above, erect a temporary noise control blanket barrier along surrounding building facades that face the construction sites.
- Designate a “disturbance coordinator” who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler, etc.) and will require that reasonable measures be implemented to current the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include it in the notice sent to neighbors regarding the construction schedule.

2.6 Required Agency Approvals

The Project may require the following approvals:

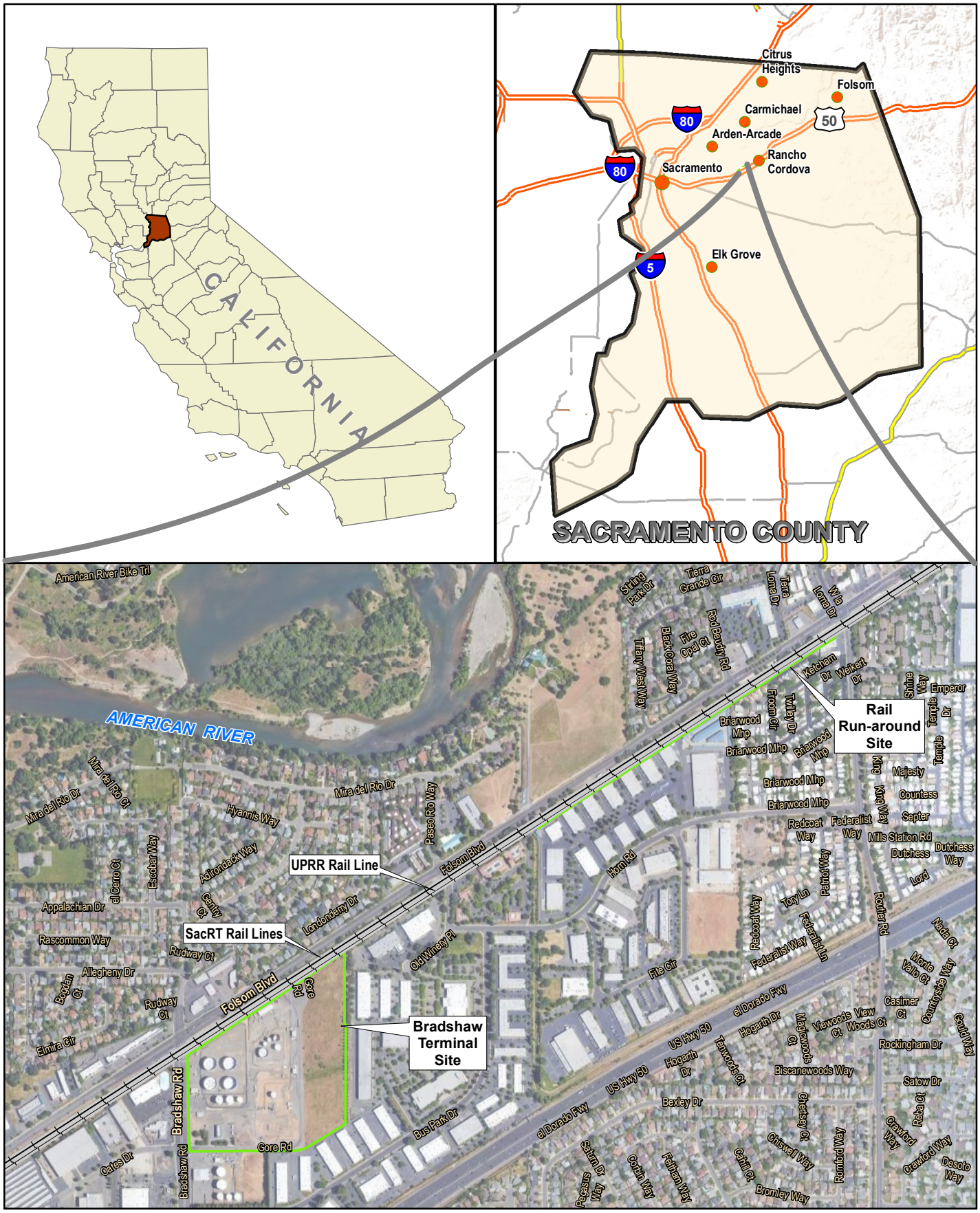
– Authority to Construction/Permit to Operate – Sacramento Metropolitan Air Quality Management District

– Temporary Discharge Permit – Sacramento Area Sewer District

2.7 Tribal Consultation

The Anthropological Studies Center (ASC) requested a review of the Native American Heritage Commission (NAHC) Sacred Lands File for information on Native American cultural resources in the Project area. NAHC responded that sacred resources may exist within the Project area and provided contact information for tribal communities that may have further information. On February 17, 2022, ASC sent letters to those on the list, which included: United Auburn Indian Community of the Auburn Rancheria, Buena Vista Rancheria of Me-Wuk Indians, Ione Band of Miwok Indians, Shingle Springs Band of Miwok Indians, Tsi Akim Maidu, Wilton Rancheria, and Colfax-Todds Valley Consolidated Tribe. Of the responses received, Wilton Rancheria indicated tribal cultural resources likely occurred within the Project area, and they requested that a tribal monitor be present during earth-disturbing activities. No other responses indicated they knew of historic resources in the Project area.

For a summary of the investigation and mitigation measures related to cultural and tribal resources, see Section 4.5 Cultural Resources and 4.17 Tribal Resources.



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SFPP KINDER MORGAN
SFPP BRADSHAW TERMINAL
RENEWABLE BY RAIL PROJECT
SACRAMENTO COUNTY, CALIFORNIA

Project No. **12555811**
Revision No. **-**
Date **Apr 7, 2022**

REGIONAL LOCATION MAP

FIGURE 1-1

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Data source: Google Aerial Imagery dated May 2018 Sources: Esri, USGS, NOAA.

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RENEWABLE BY RAIL PROJECT
SACRAMENTO COUNTY, CALIFORNIA

BRADSHAW TERMINAL

Project No. **12555811**
Revision No. **-**
Date **Apr 7, 2022**

FIGURE 1-2

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SFPP KINDER MORGAN
SFPP BRADSHAW TERMINAL
RENEWABLE BY RAIL PROJECT
SACRAMENTO COUNTY, CALIFORNIA

UPRR RAIL RUN-AROUND

Project No. **12555811**
Revision No. **-**
Date **Apr 7, 2022**

FIGURE 1-3

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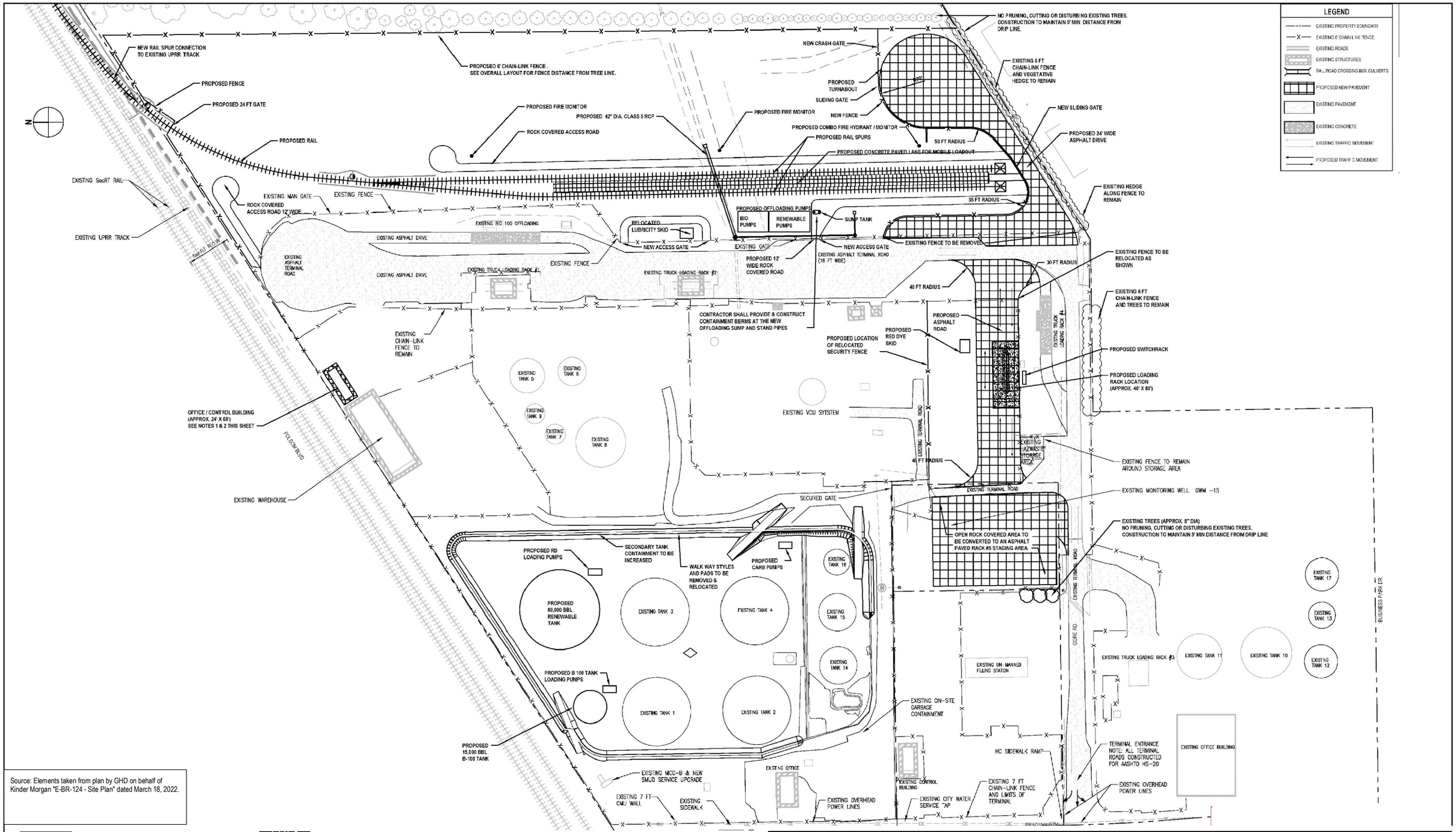

Source: Elements taken from plan by GHD on behalf of Kinder Morgan "E-BR-124 - Site Plan" dated March 18, 2022.

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JOB NO. 12555811 FILE NO. 12555811-05 SITE PLAN GHD TEXAS FIRM REGISTRATION NO. 276

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RENEWABLE BY RAIL PROJECT
SACRAMENTO COUNTY, CALIFORNIA

Project No. **12555811**
Revision No. **-**
Date **Apr 7, 2022**

BRADSHAW TERMINAL SITE PLAN

FIGURE 1-4

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SACRAMENTO COUNTY, CALIFORNIA

Project No. **12555811**
Revision No. **-**
Date **Apr 7, 2022**

UPRR RAIL RUN-AROUND SITE PLAN

FIGURE 1-5

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Print date: 07 Apr 2022 - 14:31

Data source: Google Aerial Imagery dated May 2018.

3. Environmental Factors Potentially Affected

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

☐ Aesthetics	☐ Greenhouse Gas Emissions	☐ Public Services
☐ Agricultural & Forestry Resources	☐ Hazards & Hazardous Materials	☐ Recreation
☐ Air Quality	☐ Hydrology & Water Quality	☐ Transportation
☐ Energy	☐ Land Use & Planning	☐ Tribal Cultural Resources
☐ Biological Resources	☐ Mineral Resources	☐ Utilities & Service Systems
☐ Cultural Resources	☐ Noise	☐ Wildfire
☐ Geology & Soils	☐ Population & Housing	☐ Mandatory Findings of Significance

DETERMINATION (To be completed by the Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION would be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there would not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION would be prepared.

☐ I find that the proposed MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect: (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect: (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

_____ _____

City of Rancho Cordova Signature Date

4. Environmental Analysis

4.1 Aesthetics

	Potentially Significant Impact	Less-than-Significant w/ Mitigation Incorporated	Less-than-Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?			✓	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				✓
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public view of the site and its surroundings? (Public Views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				✓
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			✓	

a) Have a substantial adverse effect on a scenic vista? (Less than Significant)

This evaluation is applicable to Project features that would be located on or disrupt access to a scenic vista, or result in significant visual changes within its viewshed. A scenic vista can generally be defined as a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public.

The City of Rancho Cordova General Plan does not identify specific scenic vista viewsheds or scenic corridors, but does identify the major mountain peaks and natural landmarks in the region, including Mt. Diablo, Pine Hill, Flagstaff Hill, Pyramid Peak, and other features as scenic vistas.

The Sierra Nevada Mountains are visible from portions of Folsom Boulevard near the Bradshaw Terminal site. Views of the Sierra Nevada Mountains are largely obscured by trees and existing buildings; however, Folsom Boulevard frames the mountains along portions of the roadway. The Sierra Nevada Mountains are also visible from portions of Bradshaw Road south of the Bradshaw Terminal. However, views are largely obscured by trees and existing buildings. The mountains are not visible in the immediate vicinity of the Bradshaw Terminal due to existing terminal facilities.

Most of the Rail Run-around and Bradshaw Terminal improvements would be at ground level. Other improvements, such as fencing, new tanks, and lighting poles would not exceed the height of adjacent existing facilities. The Project would construct two 40-foot-tall tanks adjacent to existing 40-foot-tall tanks, and 25 24-foot-tall light poles within the facility. The new light poles would be the same height as the

existing poles. The proposed new tanks and light poles would be consistent in height and dimensions with existing terminal facilities in the viewshed. The Project would not block or substantially obscure views of the Sierra Nevada Mountains from the Folsom Boulevard or Bradshaw Road.

The Project facilities would not be located on a scenic vista. Public views of the Sierra Nevada Mountains would not be substantially altered or disrupted by the Project. The Project impact on a scenic vista would be less than significant.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? (No Impact)

The Project site is not located near an officially designated state scenic highway. The nearest designated scenic highway is Route 160, more than 11 miles away. Therefore, the Project would have no impact on scenic resources within a State Scenic Highway.

c) In an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? (No Impact)

The Project is located within an urbanized area. The City of Rancho Cordova General Plan land use designation for the Project site is FBPA (Folsom Boulevard Planning Area). The City zoning for the Bradshaw Terminal site is OIMU (FBSP), Office Industrial Mixed Use/Folsom Boulevard Specific Plan, and the designation for the Rail Run-around site is T FBSP (Transportation Corridor/Folsom Boulevard Specific Plan). City review and approval Project design is a component of the minor design review.

The City of Rancho Cordova General Plan has an Urban Design Element that provides guidelines for the physical characteristics of the built environment, neighborhood appearance, and streets. The majority of the Urban Design Element goals and policies apply to residential, commercial, and mixed-use development. A review of the Urban Design Element goals policies indicates no specific policies or goals apply to the Project site. The goals focus on new development; however, the Project would occur within an existing developed area and would not include the site design components (such as new entryways, landscaping, parking lots) that are detailed in the Urban Design Element.

The proposed above-ground improvements would be located within the existing Bradshaw Terminal adjacent to similar existing infrastructure. Once constructed, the above-ground improvements would not be readily distinguishable from the existing infrastructure currently present at the facility. The existing Bradshaw Terminal tanks are set back from adjacent residents and roadways, consistent with the zoning regulations. The new facilities would be similarly placed and also consistent with setback requirements and height limitations of the OIMU and T FBSP zones. Therefore, the above-ground improvement would not conflict with applicable zoning and therefore have no impact.

The proposed rail run-around would temporarily require the presence of construction equipment near an existing neighborhood; however, the presence of construction equipment would be short-term and temporary. Once constructed, the rail run-around would be located at surface level and would not affect the existing visual character of the Project area. Therefore, the rail run-around would not conflict with applicable zoning and therefore have no impact.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? (Less than Significant)

Nighttime construction work is not anticipated to be required for the Project. Therefore, no exterior lighting would be required during construction, and no impact would result. Therefore, the potential impact during construction would be less than significant.

The Project improvements would be located within an industrial area and adjacent to an urban area where nighttime lighting currently exists, including existing parking lot lighting and street lighting. In addition, the Project site has existing lighting similar to that which would be installed as part of the Project. The proposed new lighting would be located within the Bradshaw Terminal and focused onto the areas within the site.

The Project lighting is designed to be consistent the City of Rancho Cordova Zoning Code Chapter 23.725 (Outdoor Lighting), which regulates lighting to balance the safety and security needs for lighting with the City's desire to preserve dark skies and to ensure that light trespass and glare have negligible impact on surrounding property (especially residential) and roadways. City review and approval of the lighting design is a component of the minor design review. The zoning code include standards for fixtures, shielding, placement, height, energy efficiency, and illumination levels. To comply with these requirements, specific design preferences would include directing light downward and away from other properties, shielding lights, avoiding brightly illuminated vertical surfaces where feasible, such as walls and lamp poles, and using the minimum lumens necessary. With the Project's compliance with the design requirements mentioned above, light emissions would be minimized. Due to Project design requirements, potential light or glare impacts would be less than significant.

4.2 Agriculture and Forest Resources

	Potentially Significant Impact	Less-than-Significant w/ Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				✓
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				✓
c) 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))?				✓
d) Result in the loss of forest land or conversion of forest land to non-forest use?				✓
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?				✓

a-e) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? (No Impact)

The Project would not be located on lands designated as Prime Farmland, Unique Farmland or Farmland of Statewide Importance (CDC 2016), nor on land under a Williamson Act contract (County of Sacramento 2018). The Project would not be constructed on land zoned for agricultural or forestland uses. Thus, the Project would not convert Important Farmland, land under a Williamson Act contract, or forest land to other uses, nor conflict with zoning for agricultural or forestry uses. No impact to agriculture or forestry resources would result.

4.3 Air Quality

	Potentially Significant Impact	Less-than-Significant w/ Mitigation Incorporated	Less-than-Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?				✓
b) Result in a cumulatively considerable net increase in any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			✓	
c) Expose sensitive receptors to substantial pollutant concentrations?			✓	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			✓	

The air quality analysis utilizes the thresholds of significance, screening criteria and levels, and impact assessment methodologies presented in the SMAQMD's Guide to Air Quality Assessment in Sacramento County (SMAQMD 2021). As provided by the SMAQMD's guidance, if the Project meets the screening criteria for an impact category, and is consistent with the methodology used to develop the screening criteria, then its air quality impact for that category may be considered less than significant.

a) Conflict with or obstruct implementation of the applicable air quality plan? (No Impact)

This impact relates to consistency with an adopted attainment plan. The SMAQMD's current air quality plans include:

- Sacramento Regional 8-hour Ozone Attainment and Reasonable Further Progress Plan (2013) as updated by CARB effective October 25, 2018
- PM2.5 Maintenance Plan and Redesignation Request for the Sacramento PM2.5 Nonattainment Area (2013)
- PM10 Implementation/Maintenance Plan and Redesignation Request for Sacramento County (2010)

The regional component of the Sacramento Regional Ozone Attainment Plan (OAP) includes projected increases in air pollutant emissions, including construction-generated emissions, resulting from regional growth anticipated in local land use plans such as general plans and regional transportation plans. A project is considered consistent with the regional air quality plans if it is consistent with the growth assumptions that were used to develop the plan, and complies with applicable measures in the plan.

The applicable air quality plans contain control measures that require action on the part of the SMAQMD, the California Air Resources Board (CARB), or local communities, and are not directly related to the actions undertaken for an individual project. The Project would not prevent the SMAQMD from implementing these actions and none apply directly to the Project. In addition, the Project would not result in a growth in population in the Project area; therefore, the Project would not exceed the growth assumptions contained in

the applicable plans. Implementation of the Project would not conflict with or obstruct the SMAQMD's current plans. As a result, no impact would occur.

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

Sacramento County is currently designated as nonattainment for the federal and state ambient air quality standards for ozone, the federal PM2.5 standard, and the state PM10 standard. The county is designated as attainment or unclassified for all other federal and state ambient air quality standards. Therefore, the non-attainment pollutants of concern for this impact are ozone, PM10 and PM2.5.

Ozone is not emitted directly into the air, but is a regional pollutant formed by a photochemical reaction in the atmosphere. Ozone precursors, nitrogen oxides (NOx) and reactive organic gases (ROG), react in the atmosphere in the presence of sunlight to form ozone. Therefore, the SMAQMD does not have a recommended ozone threshold, but has regional thresholds of significance for project-emitted NOx and ROG. In developing thresholds of significance for air pollutants, SMAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions (SMAQMD 2021).

Construction

Construction activities are anticipated to take approximately 5 months to complete. The types of air pollutants generated by construction activities are typically NOx and particulate matter, such as dust and exhaust. Construction activities could temporarily increase levels of PM2.5 and PM10 downwind of construction activity. These are temporary emissions that vary considerably from day-to-day and by the type of equipment and weather. In addition, carbon monoxide (CO) and ROG are emitted during operation of gas and diesel-powered construction-equipment.

Project construction would result in regional air pollutant and precursor emissions from equipment exhaust and worker trips to the Project site. The SMAQMD's 2021 Guide to Air Quality Assessment provides screening criteria for determining if a project could potentially result in significant construction-phase impacts from criteria pollutants and precursors. Per the SMAQMD's guidance, projects that are 35 acres or less in size generally will not exceed the SMAQMD's construction NOx threshold of significance. In order to use the screening level of 35 acres, a project *cannot* include any of the following parameters:

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

The Project would involve cut and fill operations, as well as import of materials. Therefore, the Project cannot use the screening. Construction criteria pollutant emissions were calculated by using CalEEMod 2020.4.0. Details regarding the source equipment inventory, assumptions, and all data used to calculate construction-related air quality emissions are available in Appendix A, Emissions Modeling Output.

Emissions for the Project were calculated for the Bradshaw Terminal construction and Rail Run-around construction. In general, due to the Project construction timeframe, it is unlikely that there would be construction activity from all phases occurring on the same day. However, to be conservative, the emissions from the highest-emitting Rail Run-around construction phase (grading) would occur at the same time as Bradshaw Terminal tank installation, paving, and rail installation.

As shown below in Table 4.3-1, Construction Air Emissions, the Project would not result in emissions of pollutants exceeding the SMAQMD's regional significance thresholds during construction. Therefore, the impact from construction related emissions would be less than significant.

Table 4.3-1 Construction Air Emissions

Construction Activity	Maximum Daily Emissions (lbs/day)		
	NOX	PM10	PM2.5
Bradshaw Terminal Construction			
Site Preparation	33.15	10.53	5.93
Grading	20.91	4.40	2.44
Tank Installation	24.18	1.70	1.26
Paving	11.15	0.68	0.55
Rail Installation	3.82	0.22	0.19
Rail Run-around Construction			
Site Preparation	9.38	3.07	1.76
Grading	14.02	3.84	2.14
Rail Installation	3.82	0.22	0.19
Maximum Daily Emissions*	***53.16***	***6.45***	***4.14***
SMAQMD Threshold	85	80	82
Significant Impact?	No	No	No

Notes:
* Maximum Daily Emissions assumes Bradshaw Terminal tank installation, paving, and rail installation, and Rail Run-around grading would occur concurrently.

Operation

Stationary Source Emissions

The Bradshaw Terminal currently operates the facility under a SMAQMD air quality permit. The Project would require the Bradshaw Terminal to amend the existing permits for SMAQMD-regulated stationary sources of air pollutants. SMAQMD regulation requirements and permitting processes ensure that new and modified permitted sources of air pollutants would not generate a significant quantity of air pollutants. Therefore, Project operations emissions associated with stationary equipment would be less than significant.

Building and Mobile Emissions

The Project would include emissions associated with the new modular control building, as well as employee and third-party vendor on-road mobile trips. Additionally, emissions would be generated by rail activity offsite (from UPRR's main Sacramento Yard) and daily onsite rail switching.

Mobile and rail activity is described in Section 2.4 of this Initial Study. Operational emissions were estimated using CalEEMod version 2020.4.0, and rail activity emissions were estimated using a fuel consumption rate of 3.9 gallons per mile and emission factors based on EPA research.

As shown in Table 4.3-2 and Table 4.3-3 the Project would not result in emissions of pollutants exceeding the SMAQMD's regional significance thresholds during project operations in summer or in winter. Therefore, the Project's contribution to a cumulative nonattainment criteria pollutant impact would be less than significant.

Table 4.3-2 Operational Air Emissions (Summer)

Operational Activity	Maximum Daily Summer Emissions (lbs/day)			
	NOX	ROG	PM10	PM2.5
Rail Activity				
Rail - Onsite Switching	3.50	0.15	0.05	0.05
Rail - Offsite Delivery	0.26	0.01	< 0.01	< 0.01
On-Road Mobile Activity				
Employee Trips	0.02	0.02	0.08	0.02
3rd Party Vendor Trips	40.77	0.69	5.20	1.64
Modular Building				
Area Sources	< 0.01	0.03	< 0.01	< 0.01
Energy Consumption	0.01	< 0.01	< 0.01	< 0.01
Total Daily Emissions	***44.55***	***0.91***	***5.33***	***1.71***
SMAQMD Threshold	65	65	80	82
Significant Impact?	No	No	No	No

Table 4.3-3 Operational Air Emissions (Winter)

Operational Activity	Maximum Daily Summer Emissions (lbs/day)			
	NOX	ROG	PM10	PM2.5
Rail Activity				
Rail - Onsite Switching	3.50	0.15	0.05	0.05
Rail - Offsite Delivery	0.26	0.01	< 0.01	< 0.01
On-Road Mobile Activity				
Employee Trips	0.02	0.02	0.08	0.02
3rd Party Vendor Trips	44.11	0.67	5.20	1.64

Operational Activity	Maximum Daily Summer Emissions (lbs/day)			
	NOX	ROG	PM10	PM2.5
Modular Building				
Area Sources	< 0.01	0.03	< 0.01	< 0.01
Energy Consumption	0.01	0.00	0.00	0.00
Total Daily Emissions	***47.90***	***0.88***	***5.33***	***1.72***
SMAQMD Threshold	65	65	80	82
Significant Impact?	No	No	No	No

c) Expose sensitive receptors to substantial pollutant concentrations? (Less than Significant)

Sensitive receptors are defined by the SMAQMD as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. The nearest sensitive receptors to the Project site are residences adjacent to the Rail Run-around site. The residences nearest to the Bradshaw Terminal site are residences approximately 200 feet north of the site boundary, across Folsom Boulevard, and more than 1,000 feet north of anticipated Project on-site truck movement.

Construction

Construction equipment and heavy-duty truck traffic generate diesel particulate matter (DPM) exhaust, which is a known toxic air contaminant. DPM from equipment exhaust and PM2.5 pose potential health impacts to nearby receptors if those receptors have prolonged exposure to substantial emissions. As required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]), construction contractors would be required to minimize idling times for trucks and equipment to five minutes, as well as to ensure that construction equipment is maintained in accordance with manufacturer's specifications.

Construction is anticipated to occur up to 5 months. As shown in Table 4.3-1 (Construction Air Emission), the calculated maximum day emissions for Project construction would be approximately 5 percent of the SMAQMD's recommended thresholds of significance for emissions of PM2.5 (DPM is a fraction of PM2.5). Additionally, the majority of heavy-duty off-road construction equipment activity would be concentrated along the southern portion of the Bradshaw Terminal Site, approximately 1,000 feet from the nearest sensitive receptors.

Given the short duration of construction activity (5 months), limited daily activity, and continuous shifting of the construction activities, distance to receptors, and because emissions would dissipate rapidly from the source with an increase in distance, prolonged exposure of sensitive receptors to substantial pollutant concentrations would not occur. Therefore, the impact of construction-related emissions on sensitive receptors would be less than significant.

Operation

As described in Impact c) above, the Bradshaw Terminal currently operates the facility under a SMAQMD air quality permit. The Project would require Bradshaw Terminal to amend exiting permits for SMAQMD-regulated stationary sources of air pollutants. SMAQMD regulation requirements and permitting process

ensure that new and modified permitted sources of air pollutants would not generate a significant impact on nearby sensitive receptors. Therefore, Project operations related to stationary sources would be less than significant.

The Project would generate an estimated 224 new truck trips per day. Onsite truck activity would be located more than 1,000 feet from the nearest receptor, with Folsom Boulevard interceding between the site and receptors. Additionally, rail activity would occur within close proximity to existing residences. As described in Section 2.4, one train delivery would occur per day, and switching operations would occur approximately 45 minutes to an hour per day. Switching activities would consist of pulling empty rail cars from the Bradshaw Terminal, moving full rail cars from the Rail Run-around site to Bradshaw Terminal, and removing the empty rail cars from the Rail Run-around site.

For reference, the California Air Resources Board's (CARB) Air Quality and Land Use Handbook: A Community Health Perspective (Land Use Handbook) provides CARB's recommendations regarding the siting of new sensitive land uses near facilities that are associated with health risks, particularly from air toxic emissions. The Land Use Handbook has siting guidance for freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities. Although this guidance is for siting new locations of sensitive receptors, the facility distance and size guidance may be used as a screening level to identify when additional analysis is warranted during environmental review, including CEQA.

The Land Use Handbook advisory recommendation for relevant land uses are:

Freeways and High Traffic Roads

- Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day.

Rail Yards

- Avoid siting new sensitive land uses within 1,000 feet of a major service and maintenance rail yard (An example of major service and maintenance rail yard includes the Roseville Rail Yard, a 950-acre yard with over 30,000 locomotives visiting annually)

As described above, the Project truck and rail activity would be minor, and would comprise a fraction of the sizes warranting recommended distances as contained in the CARB's Land Use Handbook. Additionally, rail activity would be spread out over a linear Project alignment, further reducing the duration of equipment use near individual receptor locations. Due to the short duration (no one area of prolonged or intense activity), the Project would not result in the exposure of sensitive receptors to substantial pollutant concentrations. Therefore, additional analysis is not warranted. Due to the distance from truck ingress/egress and receptors and limited number of truck trips, exposure of sensitive receptors to substantial pollution concentration would be less than significant. Due to the limited rail activity in the vicinity of sensitive receptors, exposure of sensitive receptors to substantial pollution concentration would be less than significant.

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

Implementation of the Project would not result in major sources of odor. The Project type is not one of the common types of facilities known to produce odors (i.e., landfill, coffee roaster, wastewater treatment facility, etc.). Minor odors from the use of equipment during construction activities would be intermittent and

temporary and would dissipate rapidly from the source with an increase in distance. In addition, operation of the Project would not result in locating sensitive receptors near an existing odor source. Thus, the Project would not create objectionable odors affecting a substantial number of people. The impact would be less than significant.

4.4 Biological Resources

	Potentially Significant Impact	Less-than-Significant w/ Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
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 Game or U.S. Fish and Wildlife Service?		✓		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?				✓
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				✓
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				✓
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				✓
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?				✓

Biological Resources Evaluation

A Biological Resources evaluation was prepared for the Project to identify any special-status plant and wildlife species and sensitive habitats (including wetlands) that have the potential to occur on or in the vicinity of the Project site (GHD 2021a, Appendix B). The assessment included literature and database searches as well as site surveys to determine what species might have potential to be present on the Project site. Database searches included the California Natural Diversity Database (CNDDB), California Native Plant Society (CNPS) Inventory of Rare and Endangered Vascular Plants, U.S. Fish and Wildlife Service (USFWS) Information for Planning and Conservation, and the National Oceanic and Atmospheric Administration (NOAA) Fisheries West Coast Region California Species List Tools. The database searches encompassed the U.S. Geological Survey (USGS) quadrangles (quads) centered on the Project area quad (Carmichael).

A reconnaissance field survey was conducted by a GHD Biologist on August 12, 2021. The survey methods were intended to identify sensitive habitat and detect wildlife activity. The survey included a physical search

of the area, including inspecting the ground, shrubs, holes, and trees for the presence of any wildlife species. Additionally, the bark of vegetation and the ground layer under vegetation were inspected for evidence of wildlife species, such as feathers, pellets, whitewash, scat, and tracks. This reconnaissance-level site visit was conducted to identify general special status resources and habitat within the Project site. No protocol-level surveys for wetlands, sensitive natural communities, or special status plants and wildlife were conducted at this time. The information and data collected for the assessment have been used as the basis of this biological resources analysis.

Due to the presence of a visible drainage ditch on the Bradshaw Terminal, Wetland Determination Technical Memorandum was prepared to identify if jurisdictional wetlands or waters of the U.S. or State were present (GHD 2021b, Appendix B). The wetland delineation included review of the United States Fish and Wildlife Service's (USFWS) National Wetland Inventory (NWI) maps, Federal Emergency Management Agency (FEMA) floodplain maps, Natural Resources Conservation Service (NRSC) soil maps, and current and historic aerial imagery. A site visit was conducted by two GHD biologists on September 23, 2021. It was determined that the site does not contain a wetland meeting the USACE three-parameter criteria or the SWRCB definition of a wetland.

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 Game or U.S. Fish and Wildlife Service? (Less than Significant with Mitigation)

Special-status species include those plant and wildlife species that have been formally listed, are proposed as endangered or threatened, or are candidates for such listing under the federal Endangered Species Act (ESA) or California Endangered Species Act (CESA). These acts afford protection to both listed and proposed species. Birds and raptors are protected under the federal Migratory Bird Treaty Act (50 CFR 10.13), and their nest, eggs, and young are also protected under the California Fish and Wildlife Code (§3503, §3503.5, and §3513). In addition, California Department of Fish and Wildlife (CDFW) Species of Special Concern, which are species that face extirpation in California if current population and habitat trends continue, U.S. Fish and Wildlife Service (USFWS) Birds of Conservation Concern, and CDFW special-status invertebrates, are all considered special-status species. Although CDFW Species of Special Concern generally have no special legal status, they are given special consideration under CEQA. Plant species on California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants with California Rare Plant Ranks (Rank) of 1, 2 and 4 are also considered special-status plant species and must be considered under CEQA. Bat species designated as "High Priority" by the Western Bat Working Group (WBWG) qualify for legal protection under Section 15380(d) of the CEQA Guidelines. Species designated "High Priority" are defined as "imperiled or are at high risk of imperilment based on available information on distribution, status, ecology and known threats."

A Biological Resources Technical Memorandum was prepared for the Project to evaluate the potential for special-status plant and wildlife species and sensitive habitats to occur on or in the vicinity of the Project site (GHD 2021a, Appendix B). The assessment included literature and database searches as well as a site survey to determine what species and habitats have potential to be present on the Project site. The information and data collected for the assessment have been used as the basis of this biological resources analysis.

Special-status Plant Species

No special status plant species were observed at the Project site or off-site improvement areas during a field survey conducted on August 12, 2021. In addition, review of the California Natural Diversity Database, California Native Plant Society Inventory of Rare and Endangered Vascular Plants, and U.S. Fish and Wildlife Service Information for Planning and Consultation did not identify any previously recorded special status plant species within the Project site. The nearest recorded observance of special status plant species is Sanford's arrowhead (*Sagittaria sanfordii*), which has been located within portions of Rancho Cordova.

The field adjacent to the Bradshaw Terminal hosts numerous non-native plant species. The dominant vegetation observed consisted of grass species, Russian thistle (*Salsola australis*), and sapling tree of heaven (*Ailanthus altissima*). The field is bordered by existing Bradshaw Terminal facilities to the west, a commercial business park to the south and east, and Folsom Boulevard and residential properties to the north. Based on the site survey, there is little natural habitat structure within the proposed construction area and the Project site and off-site improvement areas are unlikely to support special status plants. Therefore, based on literature review, habitat disturbance, and on-site survey observations, no impact to special-status plants would result from implementation of the Project.

Special-status Wildlife Species

American River is located approximately one-half mile north of the Project site, with known occurrences and habitat for steelhead (*Oncorhynchus mykiss irideus*), valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*), and white-tailed kite (*Elanus leucurus*). In addition, portions of Rancho Cordova south of Highway 50 are covered by the South Sacramento Habitat Conservation Plan (SSHCP 2018), which provides take authorization and conservation actions for 28 species, including giant gartersnake (*Thamnophis gigas*), Swainson's hawk (*Buteo swainsoni*), Western red bat (*Lasiurus blossevillii*), and others.

Literature and database searches did not identify any occurrences of special-status wildlife species having been previously recorded on the Project site, including any of the wildlife species noted along the American River and/or covered in the South Sacramento Habitat Conservation Plan. No special-status species were identified during the site reconnaissance conducted on August 12, 2021, and no habitat for special-status wildlife species was documented.

The Project site and off-site improvement areas are not located within the American River riparian corridor or within the area covered by the South Sacramento Habitat Conservation Plan. The Project site is not located within designated critical habitat for any special-status species. No suitable stream or wetland habitat is present on or immediately adjacent to the Project site that would support special status fish species or amphibian species.

Drainage patterns at the Project site would remain essentially the same as they currently exist and would connect to the local storm drain system, which eventually drains to the American River. The Project includes new vegetated swales to provide water quality treatment for stormwater runoff, which would be constructed along a portion of the new track on the east side of the rail car unloading area. Discharge from the vegetated swale would be directed to an existing permeable area on the Project site.

Control of pollutants in storm water discharges at the Project site is required through several required permits and plans. The Project would require adherence to the requirements set forth in the General Construction Permit, which would include best management practices (BMPs) to prevent water quality impacts during construction activities. The new facilities would be operated and maintained under a Spill Prevention, Control, and Countermeasures Plan (SPCC) and Industrial Storm Water Pollution Prevention

Plan (Industrial SWPPP), both of which are currently in place at the Bradshaw Terminal and both of which would be amended to cover operation of the proposed new facilities. The SPCC addresses training and spill prevention procedures, inspections and records, facility drainage, bulk storage containers and operational equipment, transfer operations, pumping, in-plant processes, loading/unloading, and security. The Industrial Stormwater NPDES Permit and Industrial SWPPP for the Bradshaw Terminal identifies storm water drainage patterns, discharge locations, and potential sources of storm water pollution and includes site-specific best management practices that are required to be implemented to prevent storm water pollution. A dedicated Pollution Prevention Team is responsible for compliance with the requirements of the Industrial General Permit through proper implementation of the Industrial SWPPP.

The Bradshaw Terminal also operates under a CUPA Unified Program permit and a Hazardous Materials Business Plan, which will be required to be amended and implemented for the proposed Project facilities. Off-site rail transport would require compliance with the Federal Railroad Administration's operating requirements for movement of hazardous materials, as well as the U.S. Department of Transportation's Pipeline and Hazardous Materials Safety Administration regulations for ensuring the safe and secure movement of hazardous materials to industry and consumers by all modes of transportation. This would include adherence to enhanced tank car standards, braking standards, testing and sampling requirements to determine product stability, and operational protocols, such as routing requirements, speed restrictions and informing local agencies.

With adherence to applicable regulatory requirements, the indirect impacts of storm water runoff from the Project site on downstream water bodies such as the American River would be less than significant, as the Project would not substantially degrade surface water quality.

Bats

No suitable bat roosting habitat was observed within the Project site or off-site improvement areas. The proposed Project would involve installation of new lighting; however, that lighting would be limited security lighting, would be hooded and downcast consistent with City of Rancho Cordova requirements, and similar to existing lighting within the Bradshaw Terminal. Thus, no impacts to special status bats, such as Western red bat, would result.

Passerines and Raptors

Several trees are within the Project vicinity that may provide suitable nesting habitat for common avian species protected by the federal Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (FGC). Although no tree removal is anticipated to be required for the Project, vegetation removal and ground disturbance during construction may result in potentially adverse effects to nesting birds, if present. Therefore, the potential impact to nesting birds during construction is considered significant. With implementation of Mitigation Measure BIO-1 (Prevent Disturbance to Nesting Birds), the temporary impact to nesting birds would be reduced to a less-than-significant level.

Mitigation Measure

Mitigation Measures BIO-1 would reduce the temporary construction-related impacts on protected birds to a less-than-significant level by locating any potential active nests before the start of construction and establishing buffers and avoiding nests if found.

Mitigation Measure BIO-1: Prevent Disturbance to Nesting Birds

If work must be performed during the avian nesting season (February 1 – September 1), the Applicant shall ensure that a pre-construction nesting bird survey is performed in areas within 500

feet of Project-related construction activities no more than 7 days prior to ground disturbance. If active nests are found, an appropriately sized no-disturbance buffer shall be placed around the nest at the direction of a qualified biologist conducting the survey. Active nests shall be monitored at least once per week to determine whether birds are being disturbed. Activities that might, in the opinion of the qualified biologist, disturb nesting activities (e.g., excessive noise), shall be prohibited within the buffer zone until such a determination is made. If signs of disturbance or distress are observed, the qualified biologist shall implement adaptive measures to reduce disturbance. These measures may include, but are not limited to, increasing buffer size, halting disruptive construction activities in the vicinity of the nest until fledging is confirmed or nesting activity has ceased, placement of visual screens or sound dampening structures between the nest and construction activity, reducing the number of noisy construction activities occurring simultaneously, and/or reorienting and/or relocating construction equipment to minimize noise at noise-sensitive receptors. Buffers shall remain in place until all young have fledged, or the biologist has confirmed that the nest has been naturally predated. If ground disturbance work lapses for seven days or longer during the nesting season, a qualified biologist shall conduct a supplemental avian pre-construction survey before Project work is reinitiated.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service? (No Impact)

No riparian habitat, wetlands, or other sensitive natural communities are located within the Project site or off-site improvement areas. Therefore, no impact to riparian habitat, wetlands, or other sensitive natural communities would result.

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? (No Impact)

A wetland assessment was completed to evaluate a linear drainage ditch located on a portion of the Project site (GHD 2021b, Appendix B). As part of the delineation, a review of historic aerial imagery, United States Fish and Wildlife Service's (USFWS) National Wetland Inventory (NWI) maps, Federal Emergency Management Agency (FEMA) floodplain maps, and Natural Resources Conservation Service (NRSC) soil maps was conducted.

The National Wetland Inventory does not show the presence of a wetland at the Project site or within the proposed off-site improvement areas. FEMA mapping shows that the Project site is not located within a flood hazard zone, and soil mapping indicates that the Project site is comprised of Natomas loam, 0 to 2 percent slopes. Historic aerial imagery from 1947, 1957, and 1964 shows that the Project area was primarily used for agricultural activities.

A wetland and waters assessment was conducted on September 23, 2021. Four sample points were taken within a linear drainage ditch at the Project site. Each of the four sample points did not meet the three parameter criteria outlined in the USACE's 1987 Manual and Supplements. Therefore, the ditch did not meet the definition of jurisdictional waters of the United States. With regard to the State definition of a wetland, the absence of hydrology throughout the area and the absence of hydric soil indicates that the area does not have continuous or recurrent saturation of the upper substrate caused by groundwater or shallow surface water. Because of the absence of this characteristic, anaerobic conditions in the upper

substrate have not developed within the drainage. The linear drainage ditch does not appear to convey water consistently or at any duration sufficient to develop an ordinary high-water mark. Therefore, the drainage does not qualify as a water of the State. No impact to state or federally protected wetlands would result.

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? (No Impact)

The Project site and off-site improvement areas do not contain riparian or aquatic habitat or intersect riparian corridors. No impact on movement of native resident or migratory fish or essential fish habitat would result. No new barriers to terrestrial wildlife movement would result from the Project, and the Project would not substantially interfere with migratory birds, bats, or other species. No impact would result.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (No Impact)

The Project does not involve removal of trees. Therefore, no conflict with the City's adopted tree ordinances would result.

The Rancho Cordova General Plan includes policies and action items intended to reduce potential biological resource impacts. These include policies for ensuring no net loss of wetlands (Policy NR.2.1), conserving tree resources (Policy NR.4.1), protecting surface and ground water from major sources of pollution (Policy NR.5.3), and others. The Project would not impact a state or federally protected wetland or remove trees. As described in Impact 'a' above, the Project would require adherence to the requirements set forth in the Industrial Stormwater NPDES Permit, Industrial SWPPP, SPCC, CUPA Unified Permit, and HMBP for the Bradshaw Terminal. The Project includes new vegetated swales to provide water quality treatment for stormwater runoff. No conflicts with local policies protecting biological resources have been identified. Therefore, no impact would result.

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? (No Impact)

Habitat Conservation Plans and Natural Community Conservation Plans are geographic-specific plans to address effects on sensitive species of plants and animals. There are no such adopted plans covering the Project site or the off-site improvement areas. Please see Impact 'a' for a discussion of the South Sacramento Habitat Conservation Plan, which covers portions of Rancho Cordova located south of Highway 50. No impact would result.

4.5 Cultural Resources

	Potentially Significant Impact	Less-than-Significant w/ Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?			✓	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?		✓		
c) Disturb any human remains, including those interred outside of formal cemeteries?		✓		

Archaeological Resources Study

An Archaeological Resources Study was prepared for the Project by the Anthropological Studies Center of Sonoma State University (ASC 2022). The study assessed the potential for surficial and/or buried archaeological and historical resources in the proposed improvement area through the completion of the following:

- Records and literature search at the North Central Information Center (NCIC) of the California Historical Resources Information Center (CHRIS);
- Further literature review of publications, files, and maps for ethnographic, historic-era, and prehistoric resources and background information;
- Communication with the Native American Heritage Commission (NAHC) to request a review of the Sacred Lands File and contact information for the appropriate tribal communities;
- Contact with the appropriate local Native American Tribes; and
- Pedestrian archaeological survey of the Project area.

Study results were used as a technical basis for evaluating potential impacts to historic and cultural resources under CEQA.

a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? (Less than Significant)

CEQA Guidelines Section 15064.5(b) establishes the criteria for assessing a significant environmental impact on historic resources. That section states, “[a] project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.” The CEQA Guidelines define substantial adverse change in the significance of an historical resource as a “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired” (Section 15064.5(b)(1)). The significance of an historic architectural resource is considered to be “materially impaired” when a project demolishes or materially alters the physical characteristics that justify the inclusion of the resource in the California Register of Historic Resources (CRHR), or that justify the inclusion of the

resource in a local register, or that justify its eligibility for inclusion in the CRHR as determined by the lead agency for the purposes of CEQA (Section 15064.5(b)(2)).

Two identified cultural resources are located within the Project area, which include a historic-era artifact concentration and a Southern Pacific Railroad segment. The segment of the Southern Pacific Railroad within the Project area was evaluated through survey in 1998 and found eligible for listing on the National Register. The historic era artifact concentration was subject to further investigation in 1993 with test trenches and it appears that no subsurface remains are present within the right of way.

The railroad, operated by the UPRR, is still in use and the gravel berm supporting the tracks appears to be maintained. The railroad's alignment will not be impacted by the proposed Project activities and no stations remain within the Project area. No evidence of the previously-identified historic-era artifact deposit was observed on the surface within the Project area. Therefore, the impact is less than significant. The potential for historic-period archaeological resources is evaluated in impact "b" below.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? (Less than Significant with Mitigation)

The Archaeological Resources Study conducted for the Project found no previously recorded cultural resources located within the proposed improvement area. A pedestrian archaeological survey of the Project site also identified no archaeological resources. Background research indicates a low sensitivity for prehistoric archaeological resources on the surface, and a low sensitivity for historic-era archaeological resources on the surface (ASC 2022). The sensitivity for buried prehistoric archaeological resources in the improvement area is considered low (ASC 2022). No information has been received from the NAHC regarding a search of the NAHC's Sacred Lands File for Sacred Sites. However, information suggesting the presence of sacred sites or archaeological resources was received from individuals or organizations contacted as part of the study. Such coordination included letters and telephone calls to Native American contacts provided by the NAHC. Although no known archaeological resources were identified within the Project area, the potential exists for encountering previously undiscovered archaeological resources during Project construction. If such resources were to represent unique archaeological resources as defined by CEQA, any substantial change to or destruction of these resources would be a significant impact. Therefore, the impact is considered potentially significant.

Mitigation Measure

Implementation of Mitigation Measure CR-1 would reduce the potential impact to previously undiscovered archaeological or cultural resources to a less-than-significant level by requiring procedures to be taken in the event of inadvertent discovery of resources consistent with appropriate laws and requirements.

Mitigation Measure CR-1: Archaeological Inadvertent Discovery Procedures

The Applicant shall ensure the following procedures are followed. If archaeological materials are encountered during initial ground-disturbing activities, work within 25 feet of a discovery shall be halted until a qualified archaeologist assesses the find, consults with the appropriate tribes and agencies, and makes recommendations for the treatment of the discovery to protect the integrity of the resource and ensure that no additional resources are affected. Upon completion of the assessment, the archaeologist shall prepare a report to document the methods and results of the assessment. The report shall be submitted to the City, appropriate tribes, and the North Central Information Center upon completion. Following initial ground disturbance, in the event that any

subsurface archaeological features or deposits, including locally darkened midden soil, are discovered during later construction-related earth-moving activities, all ground-disturbing activity in the vicinity of the resource shall be halted, a qualified professional archaeologist shall be retained to evaluate the find, and the appropriate tribal representative(s) shall be notified. If the find qualifies as a historical resource, unique archaeological resource, or tribal cultural resource as defined by CEQA, the archaeologist, in consultation with tribes, shall develop appropriate measures to protect the integrity of the resource and ensure that no additional resources are affected. In considering any suggested measures proposed by the consulting archaeologist in order to mitigate impacts to historical resources or unique archaeological resources, the City, in consultation with applicable Native American tribes, shall determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, Project design, costs, and other considerations. If avoidance is infeasible, other appropriate measures (e.g., data recovery, reburial at another location within the site) shall be instituted. Work may proceed on other parts of the Project while mitigation for unique archaeological resources is being carried out.

c) Disturb any human remains, including those interred outside of formal cemeteries? (Less than Significant with Mitigation)

Based on the archaeological field survey and records search performed for the Project, no indication of human burials were identified on the Project site (ASC 2022). Although no human remains have been directly observed, the possibility of encountering human remains during Project construction cannot be discounted. Therefore, the impact related to the potential disturbance or damage of previously undiscovered human remains, if present, is considered significant. Mitigation Measure CR- 2 would reduce the impact to a less-than-significant level by addressing discovery of unanticipated remains, associated grave goods, or items of cultural patrimony consistent with appropriate laws and requirements.

Following construction, no ground disturbing activities are anticipated to occur other than those related to routine maintenance of the Project, such as landscaping or irrigation repair. Therefore, it is unlikely any human remains would be encountered during operation. The operational impact would be less than significant.

Mitigation Measure

Mitigation Measure CR-2 would reduce the impact of construction activities on potentially unknown human remains to a less than significant level by addressing discovery of unanticipated remains, associated grave goods, or items of cultural patrimony consistent with appropriate laws and requirements.

Mitigation Measure CR-2: Protect Human Remains If Encountered during Construction

The Applicant shall ensure the following measures are implemented to protect human remains. If human remains, associated grave goods, or items of cultural patrimony are encountered during construction, work shall halt in the vicinity of the find and the County Coroner shall be notified immediately. The following procedures shall be followed as required by Public Resources Code § 5097.9 and Health and Safety Code § 7050.5. If the human remains are determined to be of Native American origin, the Coroner shall notify the Native American Heritage Commission within 24 hours of the determination. The Native American Heritage Commission shall then notify the Most Likely Descendant (MLD). The MLD shall complete an inspection and make its MLD recommendation for disposition of the remains within 48 hours of receiving access to the site. The Applicant and the MLD shall make all reasonable efforts to develop an agreement for the treatment, with appropriate

dignity, of any human remains and associated or unassociated funerary objects. Said determination may include avoidance of the human remains, reburial on-site, or reburial on tribal or other lands that will not be subject to future. Any reburial of human remains shall be accomplished in compliance with the California Public Resources Code Sections 5097.98(a) and (b). Unless otherwise required by law, the site of any reburial of Native American human remains shall not be disclosed.

4.6 Energy Resources

	Potentially Significant Impact	Less-than-Significant w/ Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			✓	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				✓

a) Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? (Less than Significant)

Construction

Construction of the Project would involve grading, excavation, use of heavy machinery, and materials hauling as discussed in Section 2.3, Project Construction, and Section 4.3, Air Quality. Temporary energy use in connection with Project construction would include consumption of diesel fuel and gasoline by construction equipment and transport of earth moving equipment, construction materials, supplies, and construction personnel to and from the Project site. As summarized in Section 2.5, Environmental Protection Actions Incorporated into the Project, implementation of Environmental Protection Action 2 is included as part of the Project, requiring provisions in contractor agreements for minimizing idling time to 5 minutes or less during construction, requiring construction equipment to be maintained per specifications established by the manufacturer, and using electric equipment and/or equipment using alternative fuels as feasible and appropriate. With implementation of such construction measures, the wasteful, inefficient, or unnecessary use of energy resources is not anticipated during Project construction. The impact would be less than significant.

Operation

Energy-consuming equipment anticipated to be used during operation of the Project includes mechanical and electrical equipment associated with the new modular building, new lighting, rail offloading, fuel pumping, and truck loading rack equipment. The proposed new lights would minimize energy consumption in accordance with City of Rancho Cordova Zoning Code Chapter 23.725 (Outdoor Lighting).

The new modular building would be designed and installed in accordance with applicable design standards, including Title 24 Building Energy Efficiency Standards for non-residential buildings.

Motor vehicle trips associated with employees and third-party vendor trips would utilize energy in the form of petroleum products and electricity. It is noted that the Project's operational trips are a necessary component of the Project and, therefore, would not constitute wasteful, inefficient, or unnecessary consumption of energy resources.

The increase in energy demand resulting from the Project would not be expected to require or result in the construction of new sources of energy supplies or additional energy infrastructure capacity, and the Project would not conflict with applicable energy policies or standards. Therefore, operation of the Project would not use large amounts of energy nor use it in a wasteful manner. The operational impact would be less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? (No Impact)

There are no local plans for renewable energy that would apply to the Project site. Implementation of the Project would not obstruct a state plan for renewable energy.

The City of Rancho Cordova General Plan includes goals to promote energy-conserving features in new development (Policy AQ.4.1) and sustainable development (Policy LU.2.7). Construction and operation of the Project would not conflict with or obstruct implementation of the General Plan goals. Project construction would not require a large amount of fuel or energy usage because of the limited extent and nature of the proposed improvements and the minimal number of construction vehicles and equipment, worker trips, and truck trips that would be required for a project of this small scale. Project operation would similarly utilize the minimum necessary energy to operate the facilities. No conflicts with a state or local plan for renewable energy or energy efficiency have been identified. Therefore, no impact would result.

4.7 Geology and Soils

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

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

The Alquist-Priolo Act (Public Resources Code Sections 2621–2630) was passed in 1972 to mitigate the hazard of surface faulting to structures designed for human occupancy. The purpose of the Act is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The Project

does not include structures designed for human occupancy. The Project site is not located within an active State of California Earthquake Fault Zone (Formerly known as Alquist-Priolo Special Study Zones), in which the state requires special studies for structures for human occupancy, and no other active or potentially active faults occur within the Project site.

There are no active faults that are known to cross the Project area. While lurching or cracking of the ground surface as a result of nearby seismic events is possible, the probability of damage from surface fault rupture is low (Ninyo and Moore 2021). The impact would be less-than-significant.

a.ii) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking? (Less than Significant)

The potential for future strong ground motion at the site is significant (Ninyo and Moore 2021). The Geotechnical Evaluation contains the seismic design criteria to address ground shaking, in accordance with the American Society of Civil Engineers (ASCE) 7-16 Standard and the 2019 California Building Code (CBC).

As described in Section 2.5, Environmental Protection Actions Incorporated into the Project, implementation of Environmental Protection Action 1 is included as part of the Project, requiring the Project to be designed and constructed in compliance with the site-specific recommendations made in Design Report, Geotechnical Evaluation. Earthquake engineering design as required by the Uniform Building Code would reduce the probability of damage to the facilities during a seismic event. Therefore, the potential impact related to strong seismic ground shaking would be less than significant.

a.iii) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic related ground failure, including liquefaction? (Less than Significant)

Groundwater measurements from onsite monitoring wells indicate that the depth to groundwater is about 50 feet below the ground surface. Accordingly, liquefaction and liquefaction-related seismic hazards (e.g., dynamic settlement, ground subsidence, and/or lateral spreading) are not considered potential hazards for the Project (Ninyo and Moore 2021). The impact is less than significant.

a.iv) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides? (No Impact)

The Project site is on generally flat land in a developed area. There are no slopes or hills in the area that could result in landslides on or off site. Project construction and operation would not increase the risk of landslides above existing conditions. No impact would occur.

b) Result in substantial soil erosion or the loss of topsoil? (Less than Significant)

The Project includes grading, cuts, and fills that have the potential to cause erosion. As described in Section 2.5, Environmental Protection Actions Incorporated into the Project, implementation of Environmental Protection Action 3 is included as part of the Project, requiring the Project to prepare a Storm Water Pollution Prevention Plan (SWPPP) under the National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit) (Order No. 2009-0009, as amended by Order No.

2012-0006), which includes best management practices to prevent soil erosion. Compliance with the NPDES permit requirements would ensure that potential impacts from soil erosion or loss of topsoil during construction would be less than significant.

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? (Less than Significant)

As stated in Environmental Protection Action 1, the Project would be designed and constructed in compliance with the site-specific recommendations in the Geotechnical Evaluation prepared for this Project. Requirements set forth in this evaluation were based on examinations of site conditions for this Project. These requirements would bring the probability of a landslide, lateral spreading, subsidence liquefaction or collapse to a low level. With these geotechnical requirements the impact would be less-than-significant.

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

As stated in Environmental Protection Action 1, the Project would be designed and constructed in compliance with the site-specific recommendations in the Geotechnical Evaluation prepared for this Project. Requirements set forth in this evaluation were based on examinations of site conditions for this Project. In these recommendations, the avoidance of expansive soil is addressed. Design criteria were given for the soil that is present on site. With the requirements set forth by the geotechnical evaluation, the risk of substantial direct or indirect risks to life or property as a result of expansive soil would be less-than-significant.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? (No Impact)

The Project would not install nor require the installation of septic tanks or alternative wastewater disposal systems where soil infiltration would be required. No impact would occur.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? (Less than Significant with Mitigation)

Paleontological resources are the remains or traces of prehistoric animals and plants. Paleontological resources, which include fossil remains and geologic sites with fossil-bearing strata are non-renewable and scarce and are protected by environmental legislation in California.

This Project would not include substantial excavation and it is unlikely that construction would impact potentially significant paleontological resources. However, an impact cannot be ruled out. Therefore, the impact is potentially significant.

Mitigation Measure GEO-1 would reduce the impact of construction activities on unknown paleontological resources to a less-than-significant level by addressing discovery of unanticipated buried resources and preserving and/or recording those resources consistent with appropriate laws and requirements.

Mitigation Measure

Mitigation Measure GEO-1 would reduce the impact of construction activities on unknown paleontological resources to a less-than-significant level by addressing discovery of unanticipated buried resources and preserving and/or recording those resources consistent with appropriate laws and requirements.

Mitigation Measure GEO-1: Protect Paleontological Resources during Construction Activities

In the event that fossils are encountered during construction (i.e., bones, teeth, or unusually abundant and well-preserved invertebrates or plants), construction activities shall be diverted away from the discovery within 50 feet of the find and a professional paleontologist shall be notified to document the discovery as needed to evaluate the potential resource and to assess the nature and importance of the find. Based on the scientific value or uniqueness of the find, the paleontologist may record the find and allow work to continue or recommend salvage and recovery of the material if it is determined that the find cannot be avoided. The paleontologist shall make recommendations for any necessary treatment that is consistent with currently accepted scientific practices. Any fossils collected from the area shall then be deposited in an accredited and permeant scientific institution where they will be properly curated and preserved.

4.8 Greenhouse Gas Emissions

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

The greenhouse gas analysis utilizes the screening criteria, thresholds of significance, and impact assessment methodologies presented in the SMAQMD's Guide to Air Quality Assessment in Sacramento County (SMAQMD 2021). As provided by the SMAQMD's guidance, if a project meets the screening criteria for an impact category, and is consistent with the methodology used to develop the screening criteria, then its greenhouse gas impact for that category may be considered less than significant.

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? (Less than Significant)

Construction

The Project does not meet the SMAQMD's screening levels for construction-generated greenhouse gases. Project construction was analyzed by comparing the estimated construction emissions to the SMAQMD's thresholds for construction emissions. Construction activities are anticipated to take approximately 5 months to complete. Construction of the Project would involve grading, excavation, use of heavy machinery, and materials hauling as discussed in Section 2.3, Project Construction, and Section 4.3, Air Quality. Construction greenhouse gas emissions were calculated by using CalEEMod 2020.4.0. Details regarding the source equipment inventory, assumptions, and all data used to calculate construction-related greenhouse gas emissions are available in Appendix A, Emissions Modeling Output.

As shown below in Table 4.8-1, Construction Greenhouse Gas Emissions, the Project would not result in emissions of pollutants exceeding the SMAQMD's threshold of significance for construction-generated greenhouse gases. Therefore, the impact from construction-related emissions would be less than significant.

Table 4.8-1 Construction Greenhouse Gas Emissions

Construction Activity	Metric Tons of Carbon Dioxide Equivalent ($MTCO_2e$)
Bradshaw Terminal site	157.03
Rail Run-around site	29.10
Total Project Construction	***186.13***
SMAQMD Recommended Threshold	1,100
Significant Impact?	No

Operation

Stationary Sources

The Bradshaw Terminal currently operates the facility under a SMAQMD air quality permit. The Project would require Bradshaw Terminal to amend the exiting permit for SMAQMD-regulated stationary sources of air pollutants. SMAQMD regulation requirements and permitting processes ensure that new and modified permitted sources of air pollutants would not generate a significant quantity of air pollutants, including greenhouse gases. Therefore, Project greenhouse gas operations emissions associated with stationary equipment would be less than significant.

Modular Control Building and Mobile Sources

The Project would include greenhouse gas emissions associated with the new modular control building, as well as employee and third-party vendor on-road mobile trips. Additionally, greenhouse gas emissions would be generated by rail activity offsite (from UPRR's main Sacramento Yard) and daily onsite rail switching.

Mobile and rail activity is described in Section 2.4 of this Initial Study. Operational greenhouse gas emissions were estimated using CalEEMod version 2020.4.0, and rail activity emissions were estimated using a fuel consumption rate of 3.9 gallons per mile and emission factors based on Climate Registry research. Additionally, the carbon intensity factor for SMUD was adjusted to the most recent California Energy Commission's (CEC) Power Content Label for the SMUD General Mix portfolio.

As shown in Table 4.8-2, the Project would exceed the SMAQMD's recommended threshold of significance for greenhouse gas impacts, and mitigation is required to reduce the impact to less than significant. The SMAQMD identifies recommended "Tier 2 Best Management Practices (BMP 3)" to reduce a Project's operational greenhouse impact if the threshold of significance is exceeded.

Table 4.8-2 Operational Greenhouse Gas Emissions

Operational Activity	Metric Tons of Carbon Dioxide Equivalent ($MTCO_2e$)
Rail Activity	
Rail - Onsite Switching	285.01
Rail - Offsite Delivery	20.80
On-Road Mobile Activity	
Employee Trips	7.40
3rd Party Vendor Trips	2,338.63
Modular Building	
Area Sources	0.00
Energy Consumption	4.26
Waste	0.67
Water	0.29
Total Annual Emissions	***2,657.07***

Operational Activity	Metric Tons of Carbon Dioxide Equivalent ($MTCO_2e$)
SMAQMD Screening Criteria	1,100
Exceeds Screening?	Yes

If a project achieves BMP 3, then the operational impact is considered less than significant, and no additional analysis is required. Projects that do not meet the BMP 3 are required to implement additional measures. BMP 3 consists of reductions in vehicle miles traveled (VMT) that are based on adopted SB 743 targets and includes quantifiable VMT reduction targets for residential, office, and retail projects. BMP 3 does not include industrial land uses. SMAQMD's guidance provides that a project that meets the de minimis criteria for VMT in the Office of Planning and Research's (OPR) *SB 743 Technical Advisory on Evaluating Transportation Impacts in CEQA*, must document the qualifying criteria to satisfy the BMP 3 requirement.

As provided in OPR's technical advisory recommendations regarding methodology:

> **Vehicle Types**. Proposed Section 15064.3, subdivision (a), states, "For the purposes of this section, 'vehicle miles traveled' refers to the amount and distance of automobile travel attributable to a project." Here, the **term "automobile" refers to on-road passenger vehicles, specifically cars and light trucks**. Heavy-duty truck VMT could be included for modeling convenience and ease of calculation (for example, where models or data provide combined auto and heavy truck VMT). For an apples-to-apples comparison, vehicle types considered should be consistent across project assessment, significance thresholds, and mitigation. (emphasis added)

The OPR's screening threshold for small projects states:

> Absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact.

As shown in Section 2.47 of this Initial Study, the Project would generate an estimated 10 trips per day from employees, and 224 trips per day from third-party vendors. Third-party vendors would use heavy- duty trucks and, therefore, are not included in the vehicle types assessed by CEQA Guidelines Section 15064.3. At an estimated 10 trips (cars and light trucks), the Project would not exceed the OPR's screening threshold for small projects. As detailed in Section 4.17, Impact b, the Project has been determined to be exempt from VMT calculation and would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). Therefore, the Project meets the SMAQMD's recommended BMP 3 and would result in a less than significant impact to greenhouse gas emissions.

b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases? (No Impact)

The City of Rancho Cordova Climate Action Plan is currently under development and is not an adopted greenhouse gas reduction strategy. This analysis uses the Sacramento Area Council of Governments (SACOG) adopted Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) as the applicable greenhouse gas reduction strategy.

Sacramento County is part of a larger metropolitan planning jurisdiction (El Dorado, Placer, Sacramento, Sutter, Yolo, and Yuba Counties), which is coordinated by SACOG. SACOG is designated by the federal government as the metropolitan planning organization (MPO) for the Sacramento region. CARB sets regional targets for California's 18 MPOs to use in their Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) to plan future projects that will cumulatively achieve GHG reduction goals. Targets are set at a percent reduction of passenger vehicle GHG emissions per person from 2005 levels.

The regional passenger vehicle GHG emissions reduction target for SACOG is 19 percent below 2005 levels by 2035 (CARB 2020). The 2020 MTP/SCS demonstrates a 19 percent reduction from the 2005 baseline, with a detailed breakdown of the emission reductions contained in Appendix E, Plan Performance, of the MTP/SCS.

As shown above in Table 4.8-2, mobile emissions are the largest portion of Project's operational emissions and, therefore, it is appropriate to use SACOG's MTP/SCS. As shown in MTP/SCS Figure 3.5, Community Types, the Project is located within a 'Center/Corridor Community'. Land uses in Center and Corridor Communities are typically denser and more mixed than surrounding land uses. As detailed in Section 4.17, Impact b, the Project has been determined to be exempt from VMT calculation and would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). Additionally, the Project would result in an intensification of an existing industrial use in a Center and Corridor Community, adjacent to existing rail and highway infrastructure. Therefore, the Project is does not conflict with the MTP/SCS, and would result in no impact.

4.9 Hazards and Hazardous Materials

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

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

The Project would include modifications to the existing Bradshaw Terminal petroleum facility located at the Project site. The Bradshaw Terminal facility currently receives, stores, and distributes petroleum products (including gasoline, diesel, ethanol, turbine fuel, lubricity, additives and red dye) via truck and pipeline. The existing facility consists of petroleum storage tanks, fuel truck loading racks, and related support facilities.

The Project would expand the use of the existing facility by adding two new storage tanks, additional fuel truck loading facilities, and new rail car loading/unloading tracks. A new track also would be installed to branch off of the Union Pacific track and run into the facility and split into two separate unloading tracks.

The proposed two new storage tanks would be added to the main tank storage area with respective capacities of 15,000 BBL for biodiesel and 80,000 BBL for renewable diesel. Biodiesel is not identified as a

hazardous material under the criteria of the Federal OSHA Hazard Communication Standard 29 CFR 1910.1200 and contains no chemicals known to the state of California to cause cancer. Renewable diesel is a combustible liquid containing substances regulated as hazardous substances under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) (40 CFR 302).

The proposed new tanks would be located on the northwest side of the terminal within a containment berm area that prevents the release of the stored product in the event of a failure. The Project would also include the design of new rail spurs and unloading equipment on the east side of the terminal limits, with a capacity to offload up to 22 railcars per day.

The Project improvements would require compliance with the Unified Hazardous Waste and Hazardous Material Management Regulatory Program. The Sacramento County Environmental Management Department has been designated by Cal EPA to implement the Unified Program for Sacramento County. The Unified Program consolidates and coordinates hazardous waste program elements, including the Aboveground Petroleum Storage Act (APSA); California Accidental Release Prevention Program (Cal ARP); Hazardous Material Release Response Plans and Inventories; Hazardous Waste Generation, including onsite treatment under Tiered Permitting; Spill Prevention Control and Countermeasure Plan (SPCC); Underground Storage Tanks (UST); and Uniform Fire Code Hazardous Materials Management Plans and Inventories. The Bradshaw Terminal is permitted under the Sacramento County Environmental Management Department CUPA regulatory program. In conjunction with the Hazardous Materials Business Plan Program, Sacramento County Environmental Management staff inspect the site for compliance with the Hazardous Waste Control Act, verify Hazardous Waste accumulation, labeling, container and tank management standards, and waste generator status, and respond to complaints of illegal disposal of hazardous waste.

The Bradshaw Terminal operates under a Spill Prevention, Control, and Countermeasures Plan (SPCC) and Industrial Storm Water Pollution Prevention Plan (Industrial SWPPP), both of which would be amended and implemented for the proposed Project. The Facility is operated in accordance with a Hazardous Materials Business Plan pursuant to Chapter 6.95, Division 20 of the California Health and Safety Code. The plan contains a hazardous materials inventory and emergency response procedures.

The transportation of hazardous materials on railroads and roadways is regulated by U.S. Department of Transportation, the CHP, and Caltrans, and use of such materials is regulated by the DTSC (22 Cal. Code Regs §§ 66001, et seq.). The use, storage, and transport of hazardous materials is required to be in compliance with local, state, and federal regulations during both Project construction and operation. The Bradshaw Terminal facility is required to operate under a permit and comply with appropriate regulatory agency standards designed to avoid hazardous waste releases. The Project would be required to comply with federal, state and local regulations regarding the handling, transportation, disposal, and clean-up of hazardous materials.

All potentially hazardous materials would be required to be handled, used, and stored in accordance with manufacturers' specifications and applicable health and safety regulations. Compliance with the requirements of the CUPA Unified Permit, Hazardous Materials Business Plan, SPCC, and Industrial SWPPP programs would ensure that hazardous materials are properly transported, stored, inventoried, and disposed. Mandatory compliance with regulations would ensure that the improvements to the existing facility are constructed, maintained, and operated in accordance with current safety and environmental protection standards. With adherence to applicable regulatory requirements, the operational impacts related to the transport, use, or disposal of biodiesel (non-hazardous) and renewable diesel (hazardous) would be less than significant.

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

As discussed under Impact 'a' above, the Project would expand the use of the existing Bradshaw Terminal facility by adding two new storage tanks, additional fuel truck loading facilities, and new rail car loading/unloading tracks. A new track also would be installed to branch off of the Union Pacific track and connect to the facility and split into two separate unloading tracks. The Project would have a capacity to offload up to 22 railcars per day.

The Federal Railroad Administration has primary jurisdiction over railroad safety, covering the safety of track, grade crossings, rail equipment, operating practices, and movement of hazardous materials. The U.S. Department of Transportation's (DOT) Pipeline and Hazardous Materials Safety Administration is responsible for regulating and ensuring the safe and secure movement of hazardous materials to industry and consumers by all modes of transportation, including railroads. In May 2015, the DOT issued a final rule titled "Hazardous Materials: Enhanced Tank Car Standards and Operational Controls for High-Hazard Flammable Trains." The rule establishes a variety of standards with which the Project would be required to comply, including enhanced tank car standards, braking standards, testing and sampling requirements to determine product stability, and operational protocols, such as routing requirements, speed restrictions and informing local agencies. The U.S. Department of Homeland Security's Transportation Security Administration (TSA) also issues safety standards for railways, and the National Transportation Safety Board (NTSB) is responsible for making recommendations to prevent future incidents.

As described in Impact 'a' above, the Bradshaw Terminal operates under a CUPA Unified Program permit, a HMBP, SPCC, and Industrial SWPPP, all of which would be required to be amended and implemented for the proposed Project. The HMBP contains a hazardous materials inventory and emergency response procedures, pursuant to Chapter 6.95, Division 20 of the California Health and Safety Code. The existing SPCC would be updated to include the changes in the design, construction, operation, and maintenance of the facility, including the addition of the proposed new tanks, transfer areas, and secondary containment structures. This would include modification of the SPCC pursuant to the requirements of 40 CFR Part 112 and site inspections of the modified facility. The SPCC addresses the requirements contained in the Federal Spill Prevention, Control, and Countermeasure Regulation and the California Aboveground Petroleum Storage Tank Act. This includes training and spill prevention procedures, inspections and records, facility drainage, bulk storage containers and operational equipment, transfer operations, pumping, in-plant processes, loading/unloading, and security. The Bradshaw Terminal is operated in accordance with an Industrial Storm Water NPDES permit which controls pollutants in storm water discharges. The Industrial SWPPP identifies storm water drainage patterns, discharge locations, and potential sources of storm water pollution and includes site-specific BMS that must be implemented to prevent storm water pollution. A dedicated Pollution Prevention Team is responsible for compliance with the requirements of the Industrial General Permit through proper implementation of the SWPPP.

The use, storage, and transport of hazardous materials is required to be in compliance with local, state, and federal regulations during both Project construction and operation. The Bradshaw Terminal facility is required to operate under a permit and comply with appropriate regulatory agency standards designed to avoid hazardous waste releases. The Project would be required to comply with federal, state and local regulations regarding the handling, transportation, disposal, and clean-up of hazardous materials. With required adherence to applicable regulatory requirements, the impacts related to accidental release of hazardous materials would be less than significant.

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

The Project site and off-site improvement areas are not located within 0.25 mile of an existing or proposed school. The two nearest schools to the Project site are A.M. Winn Elementary School and Sierra Lower School of Sacramento, both of which are located approximately 0.5 mile from the nearest portion of the Project site and greater than 0.7 mile from the nearest portion of the proposed off-site UPRR rail spur. Abraham Lincoln Elementary School and Cordova Meadows Elementary School are each located greater than 1 mile from the nearest portion of the Project site, and approximately 0.6 mile from the nearest portion of the proposed off-site rail spur. The impact would be less than significant.

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? (Less than Significant with Mitigation)

The Bradshaw Terminal site is listed and regulated as a Cleanup Program Site under the State Water Resources Control Board's Site Cleanup Program. A site investigation is currently ongoing for the determination of the presence of per- and polyfluoroalkyl substances at Bradshaw Terminal pursuant to California State Water Resources Control Board Order WQ 2021-0006. The Bradshaw Terminal is also listed as an inactive Tiered Permit site in the EnviroStor database.

Based on the anticipated depth of groundwater at the Project site (greater than 50 feet below ground surface), construction activities are not anticipated to encounter groundwater. However, because of the potential presence of contamination in soils, construction activities may potentially encounter residual concentrations of hydrocarbons or other hazardous materials during ground disturbance activities. The impact is considered potentially significant. With implementation of Mitigation Measure HAZ-1, provided below, the potential impact would be reduced to a less-than-significant level.

Mitigation Measure

Implementation of Mitigation Measure HAZ-1 would reduce the impact of potential exposure from potential hazardous materials to construction workers, nearby receptors, and the environment to a less-than-significant level by conducting site investigatory soil pre-characterization for specific contaminants of concern (COCs), and requiring the proper handling and disposal of hazardous wastes per applicable local, state and federal regulations and/or guidelines. With implementation of Mitigation Measure HAZ-1, the impact related to disturbance of hazardous materials would be less than significant.

Mitigation Measure HAZ-1: Soil Characterization and Management during Construction

The Applicant shall complete the following requirements prior to the start of construction:

- A Sampling Analysis Plan (SAP) shall be prepared to define sample locations, boring depths based upon design, estimated soil volumes, and number of borings to adequately pre-characterization Project area soils. The SAP shall include pre-characterization of soil for potential constituents of concern (COCs), and shall include an assessment of CAM-17 metals and petroleum hydrocarbons prior to initiating construction activities. The SAP shall further include specifications for surficial samples that will be collected to the proposed depth of excavation in the areas where ground disturbing activities are proposed.

- Prior to construction of the Project, pre-characterization shall be conducted at SAP identified locations of planned ground disturbance for worker protection and waste characterization.
- If pre-characterization analysis results determine COCs above regulatory background thresholds for human and environmental health exposure, then a site-specific Soil Management (SMP) shall be prepared to address proper handling of potentially impacted soil prior to waste stream characterization, proper disposal, and handling requirements for worker protection. The SMP shall proactively plan for and manage potentially encountered hazardous materials affected soils, and to provide special soil handling and stockpiling details throughout the Project Area construction areas for worker protection, final waste disposal purposes and to mitigate potential Project construction delays. The SMP shall indicate the specific level of any protection required for construction workers and include preparation of a site-specific health and safety plan in accordance with federal OSHA regulations (29 CFR 1910.120) and Cal-OSHA regulations (8 CCR Title 8, Section 5192) to address worker health and safety issues during construction.
- A Soil Excavation, Stockpiling and Transportation Plan (SESTP) shall be prepared once the areas of Project ground disturbance are confirmed and prior to construction. The SESTP will specify measures to appropriately manage soil spills during Project construction for waste characterization, worker protection, fugitive emissions control and disposal. Alternatively, soil spoils can be initially field screened (visual, olfactory, photo-ionization detector, etc.) and stockpiled, then subsequently characterized for appropriate disposal methods according to applicable waste facility requirements.
- All potentially contaminated materials encountered during Project construction activities shall be evaluated in the context of applicable local, state and federal regulations and/or guidelines governing hazardous waste. All materials deemed to be hazardous shall be remediated and/or disposed of following applicable regulatory agency regulations and/or guidelines. Disposal sites for both remediated and non-remediated soils shall be identified prior to beginning construction. Management of these sites shall be documented in a Material Management Plan acceptable to applicable agencies. All evaluation, remediation, treatment, and/or disposal of hazardous waste shall be supervised and documented by qualified hazardous waste personnel.

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? (Less than Significant)

Mather Airport is located approximately 1.7 miles to the southeast of the Project site. The Project site is not located within the Mather Airport designated Clear Zone, Approach-Departure Zone, or Overflight Zone, as designated in the Mather Airport Comprehensive Land Use Plan (SACOG 1997).

A Draft Update to the Mather Airport Land Use Compatibility Plan shows the Project site located within the outer boundary of Safety Zone 6 (Airport Traffic Pattern Zone) (SACOG 2020). Industrial uses including fuel storage and distribution facilities are conditionally compatible land uses within Safety Zone 6 in the Draft ALUP. The proposed two new tanks would be 40-feet in height and would be located within the tank storage area on the northwest side of the terminal amongst tanks of similar in height. The Project would not conflict with height restrictions or other safety regulations pertaining to the airport, and would not expose

people residing or working in the area to excessive aircraft-related noise. Therefore, the impact would be less than significant.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (No Impact)

Rancho Cordova participates in the Standardized Emergency Management System (SEMS) and the National Incident Management System (NIMS) and complies with the State of California Emergency Services Act. The Safety Element of the Rancho Cordova General Plan includes goals, policies, and actions to minimize the potential risk of death, injuries, property damage, and economic hardship and social displacement resulting from fires, floods, earthquakes, landslides, and other hazards. The Safety Element also addresses safety and hazards related to airport land use, groundwater contamination, traffic and pedestrian accidents at interfaces with rail lines, the potential release of hazardous materials into the community, and general issues related to police and fire protection services.

The Sacramento Operational Area Plan (OA Plan) addresses planned methods for managing information, resources, and priorities during a multi-jurisdiction response to extraordinary emergency situations associated with natural and human caused disasters. The Sacramento OA Plan encompasses the boundaries of Sacramento County and includes the City of Rancho Cordova. The Sacramento County Local Hazard Mitigation Plan addresses long-term risk to people and their property from hazards. Sacramento County is currently partnering with Rancho Cordova and other municipalities to develop an Update to the 2016 Local Hazard Mitigation Plan.

The Project would not change existing circulation patterns along local roadways or generate substantial new traffic. The Project would not require encroachment into roadways for construction activity and would not affect local roadways that could be used as emergency response routes. The Project would not physically interfere with emergency response or evacuation elements associated with local and regional plans. Therefore, no impact would result.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? (Less than Significant with Mitigation)

The Project site improvements are located in a Local Responsibility Area (LRA), which is an area where a local agency, in this case the City of Rancho Cordova, has primary responsibility for fire and emergency response. California Department of Forestry and Fire Protection mapping (CALFIRE 2022) indicates the entirety of Rancho Cordova is located outside of Very High Fire Hazard Severity Zones.

As noted in the Rancho Cordova General Plan EIR, the main source of wildland fire within the City occurs where natural resource and habitat areas interface with urbanized development, such as along the American River Parkway and northern boundary of the City Planning Area. Such areas are not located in the Project vicinity.

Although the Project site and off-site improvement areas are not located within designated areas at risk of wildland fires, it is possible that accidental fire ignition could occur during construction (e.g., related to heavy machinery usage). Because the vegetation at portions of the Project site and off-site improvement areas could be dry during construction, and because of the close proximity of nearby residences, the construction-related impact is considered significant. With implementation of Mitigation Measure HAZ-2 (Reduce Wildland Fire Hazards during Construction), the potential impact related to wildland fires during construction would be reduced to a less-than-significant level.

Mitigation Measure

Implementation of Mitigation Measure HAZ-2 would require the use of construction techniques that would reduce the likelihood of wildland fires during construction of the Project. With implementation of Mitigation Measure HAZ-2, the impact related to wildland fires would be less than significant.

Mitigation Measure HAZ-2: Reduce Wildland Fire Hazards during Construction

Prior to construction, the Applicant and its contractor(s) shall remove and/or clear away dry, combustible vegetation from the construction site. Grass and other vegetation less than 18 inches in height above the ground shall be maintained where necessary to stabilize the soil and prevent erosion. Vehicles shall not be parked in areas where exhaust systems contact combustible materials. Fire extinguishers shall be available on the construction site to assist in quickly extinguishing any small fires, and the contractors shall have on site the phone number for the local fire department.

4.10 Hydrology and Water Quality

	Potentially Significant Impact	Less-than-Significant w/ Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			✓	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				✓
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site?			✓	
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?			✓	
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?			✓	
iv. Impede or redirect flood flows?				✓
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				✓
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				✓

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? (Less than Significant)

Construction

The Project would include modifications to the existing Bradshaw Terminal petroleum facility located at the site, which is approximately 31 acres in size and consists of petroleum storage tanks, fuel truck loading racks, and related support facilities. During construction, temporary construction activities have the potential to degrade water quality that could be discharged to the local storm drain system as a result of erosion caused by earthmoving activities or the accidental release of hazardous construction chemicals. Therefore, if not properly managed, construction activities could result in erosion, as well the discharge of chemicals and materials. In such an instance, applicable water quality standards and waste discharge requirements

could be violated, and polluted runoff could substantially degrade water quality in the local storm drain system.

As summarized in Section 2.5, the Applicant and/or construction contractor would be required to obtain coverage under State Water Resources Control Board Order No. 2009-0009-DWQ, Waste Discharge Requirements for Discharges of Storm Water Runoff Associated with Construction and Land Disturbance Activities, as amended by Order No. 2012-0006. This would include required submittal of permit registration documents (notice of intent, risk assessment, site maps, construction Storm Water Pollution Prevention Plan (SWPPP), annual fee, and certifications) to the State Water Resources Control Board. The construction SWPPP would address pollutant sources, non-storm water discharges resulting from construction dewatering, best management practices, and other requirements specified in the above-mentioned Order. The SWPPP would also include dust control practices to prevent wind erosion, sediment tracking, and dust generation by construction equipment. A Qualified SWPPP Practitioner would oversee implementation of the plan, including visual inspections, sampling and analysis, and ensuring overall compliance. With implementation of the storm water control measures identified in Section 2.5 of this Initial Study, the impact of construction-related activities on water quality would be less than significant.

Operation and Maintenance

Following construction, the Project would include operation and maintenance of two new storage tanks at the existing Bradshaw Terminal storing renewable diesel and biodiesel, as well as operation and maintenance of new fuel truck loading facilities and rail car unloading facilities. The proposed two new storage tanks would be located within an existing tank storage area on the northwest corner of the property, and within an area that includes a secondary containment berm sized to prevent the release of stored product.

The Project site is located within the California Regional Water Quality Control Board's Central Valley Region (CVRWQCB). The Water Quality Control Plan for the Sacramento River Basin and the San Joaquin River Basin (Basin Plan) addresses surface and groundwater quality within the Project area.

The Bradshaw Terminal Facility has four existing storm water discharge points to which runoff discharges directly to a municipal storm sewer (MS4). The Bradshaw Terminal Facility does not discharge to a water body that has a Total Maximum Daily Load (TMDL) requirement or is listed as impaired under CWA 303(d) for industrial pollutants associated with the facility.

Control of pollutants in storm water discharges at the Bradshaw Terminal is required through several required permits and plans. The new facilities would be operated under a Spill Prevention, Control, and Countermeasures Plan (SPCC) and Industrial Storm Water Pollution Prevention Plan (Industrial SWPPP), both of which are currently in place at the Bradshaw Terminal and both of which would be amended to cover operation of the proposed new facilities. The existing SPCC for the Bradshaw Terminal would be updated to include the changes in the design, construction, operation, and maintenance of the facility, including the addition of the proposed new tanks, transfer areas, and secondary containment structures. This will include modification of the SPCC pursuant to the requirements of 40 CFR Part 112 and site inspections of the modified facility. The SPCC also addresses personnel, training and spill prevention procedures, inspections and records, facility drainage, bulk storage containers and operational equipment, transfer operations, pumping, in-plant processes, loading/unloading, and security.

An Industrial Stormwater NPDES Permit and Industrial SWPPP for the Bradshaw Terminal identifies storm water drainage patterns, discharge locations, and potential sources of storm water pollution and includes site-specific best management practices that are required to be implemented to prevent storm water

pollution. A dedicated Pollution Prevention Team is responsible for compliance with the requirements of the Industrial General Permit through proper implementation of the Industrial SWPPP.

The Bradshaw Terminal also operates under a CUPA Unified Program permit and a Hazardous Materials Business Plan, which would be required to be amended and implemented for the proposed Project facilities. The Hazardous Materials Business Plan includes a hazardous materials inventory and emergency response procedures, pursuant to Chapter 6.95, Division 20 of the California Health and Safety Code.

The proposed Project includes new vegetated swales to provide water quality treatment for stormwater runoff from new impervious surfaces. The proposed Project would result in approximately 1.6 acres of new impervious surfaces at the Project site. The proposed vegetated swale would be constructed along a portion of the new track on the east side of the rail car unloading area. Discharge from the vegetated swale would be directed to an existing permeable area on the Project site.

All potentially hazardous materials would be required to be handled, used, and stored in accordance with manufacturers' specifications and applicable health and safety regulations. The use of hazardous materials would require compliance with the Hazardous Materials Business Plan Program, Hazardous Waste Generator Program, and Accidental Release Program. Compliance with the requirements of these programs at the Project site would be achieved through compliance with the CUPA Unified Permit, the SPCC, the Industrial SWPPP.

Off-site rail transport would require compliance with the Federal Railroad Administration's operating requirements for movement of hazardous materials, as well as the U.S. Department of Transportation's Pipeline and Hazardous Materials Safety Administration regulations for ensuring the safe and secure movement of hazardous materials to industry and consumers by all modes of transportation (see Section 4.9, Hazards and Hazardous Materials). This would include adherence to enhanced tank car standards, braking standards, testing and sampling requirements to determine product stability, and operational protocols, such as routing requirements, speed restrictions and informing local agencies.

With adherence to applicable regulatory requirements, the operational impacts related to water quality standards or waste discharge requirements would be less than significant, and the Project would not substantially degrade surface or ground water quality.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? (No Impact)

Relative to groundwater, the Project site is located within the South American Subbasin, which was designated as a high priority groundwater basin by the California Department of Water Resources (DWR). Please see Impact 'e' below for additional information on the local groundwater basin and the applicable groundwater sustainability plan. No groundwater supplies would be needed to support the Project, nor would construction or operation of the Project interfere with groundwater recharge in a manner that would impact groundwater resources. Therefore, no impact to sustainable groundwater management would result.

c.i) 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 result in substantial erosion or siltation on- or off-site? (Less than Significant)

Drainage at the Project site generally flows from east to west across. The onsite drainage system consists of a series of ditches, pipes, culverts, and inlets, and the system connects to the Rancho Cordova storm water drainage system on Bradshaw Road through an existing storm drain connection.

Approximately 75% of the existing Bradshaw Terminal is developed with a combination of tanks, equipment, gravel, and pavement. The Project would expand the use of the existing facility by adding two new storage tanks, additional fuel truck loading facilities, new rail car unloading tracks, new track branching off of the Union Pacific track, and additional street paving. The Project would increase the amount of impervious surfaces at the Project site by approximately 1.6 acres.

No on-site streams or creeks are present on the property. Drainage patterns at the Project site would remain essentially the same as they currently exist and would connect to the local storm drain system. The Project would require adherence to the requirements set forth in the General Construction Permit, which would include a construction SWPPP that includes BMPs to prevent erosion and siltation.

Operation and maintenance activities would also require adherence to the requirements set forth in the Industrial Stormwater NPDES Permit, Industrial SWPPP, SPCC, CUPA Unified Permit, and HMBP for the Bradshaw Terminal (see Impact ‘a’ for additional information). As a result, the impacts relative to erosion or siltation would be less than significant.

c.ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? (Less than Significant)

No on-site streams or creeks are present on the Project site and the site and off-site improvement areas are not located within a 100-year flood hazard. The Project would increase the amount of impervious surfaces at the Project site by approximately 1.6 acres. The portion of the Project site that would have new impervious pavement represents approximately five percent of the total area of the Bradshaw Terminal site. The increase in surface runoff was modeled to be 0.6 cubic feet per second (GHD 2021c, Appendix D).

Because the increased impervious area exceeds one acre, permanent water quality treatment is included as part of the Project. The Project includes new vegetated swales to provide water quality treatment for stormwater runoff, which would be constructed along a portion of the new track on the east side of the rail car unloading area. Discharge from the vegetated swale would be directed to an existing permeable area on the Project site. Drainage patterns at the Project site would remain essentially the same as they currently exist and would connect to the local storm drain system.

Because the on-site drainage infrastructure for the Project is adequate and would be required to manage the increase in runoff and mimic existing hydrologic conditions, the stormwater drainage system would have adequate capacity to serve the Project. As a result, the impacts relative to storm drain capacity and potential for flooding would be less than significant.

c.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? (Less than Significant)

Please see Impact ‘c.ii’ above relative to contribution of runoff water in relation to the capacity of existing stormwater drainage systems, and Impact ‘a’ above relative to water quality and sources of polluted runoff.

Because the on-site drainage infrastructure for the Project is adequate and would be required to manage the increase in runoff and mimic existing hydrologic conditions, the stormwater drainage system would have adequate capacity to serve the Project. Compliance with existing regulations would ensure that the Project facilities are managed during construction to avoid discharges to the storm water system, and designed and operated to minimize the potential for violations of water quality standards. As a result, the impacts relative to drainage capacity and water quality would be less than significant.

c, iv) Impede or redirect flood flows? (No Impact)

No streams or creeks are present at the Project site or at the off-site improvement areas. The Project site and off-site improvement areas are located in FEMA Zone X, which is defined as areas of minimal flood hazard (FEMA 2012). The Project is not located within a 100-year flood hazard area or within a floodway or other special flood hazard zone. No impact relative to flood flows would result.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? (No Impact)

The Project site is not located within a designated floodplain or within a tsunami or seiche zone. No impact would result.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? (No Impact)

As described under Impact ‘a’ above, the Project site is located within the CVRWQCB and within an area covered by the Water Quality Control Plan for the Sacramento River Basin and the San Joaquin River Basin. The Project would be required to comply with applicable storm water standards and permits that are designed to reduce potential water quality impacts to a less-than-significant level. As further described under Impact ‘a’ above, the Project as proposed would not conflict with or obstruct implementation of the regional Basin Plan. Therefore, no impact related to obstruction of the Basin Plan would result.

In 2014, the State of California enacted the Sustainable Groundwater Management Act (SGMA), which requires groundwater basins and subbasins in California designated as high- or medium-priority by the DWR to be managed sustainably. The Project site is located within the South American Subbasin, which was prioritized as a high priority basin by DWR and was required to comply with SGMA. The South American Subbasin Groundwater Sustainability Plan includes an assessment of the impacts of predicted future groundwater levels on beneficial users, including groundwater-dependent ecosystems, shallow wells, and interconnected surface water. The assessments are used to develop measurable sustainable management criteria that avoid significant and unreasonable impacts to these beneficial users, and that can be monitored and adjusted throughout plan implementation. The South American Subbasin Groundwater Sustainability Plan concludes that the basin will be sustainable over the next twenty years as long as planned recycled water, recharge and other projects are implemented. As described in Impact ‘b’ above, the Project would not utilize or decrease groundwater supplies nor substantially interfere with groundwater recharge. Therefore, no conflict with the South American Subbasin Groundwater Sustainability Plan would result.

4.11 Land Use and Planning

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

a) Physically divide an established community? (No Impact)

Division of an established community typically occurs when a new physical feature, in the form of a highway or railroad, physically transects an area, thereby removing mobility and access within an established community. The Project would implement improvements at existing fuels terminal and within an existing rail corridor. There are no components of the Project that would reduce mobility, access, or otherwise preclude continuity of established land uses in the Project area. Therefore, no impact related to division of an established community would result.

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? (No Impact)

The Project would implement improvements at existing fuel terminal and within an existing rail corridor. The improvements would be consistent with the allowable uses within the FBPA (Folsom Boulevard Planning Area) land use designation of the City of Rancho Cordova General Plan, and respective OIMU (FBSP), Office Industrial Mixed Use/Folsom Boulevard Specific Plan and T FBSP (Transportation Corridor/Folsom Boulevard Specific Plan) zoning.

Specific policies and regulations adopted for the purpose of avoiding or mitigating environmental effects are evaluated in this document under the corresponding issue areas. See Sections 4.13, Noise, for a full analysis of the Project's noise impacts.

The Project would not involve a change of land use on the affected property. Ultimately the land use of the Project site would remain the same as existing conditions, as it would continue to provide fuel storage and loading facilities. The proposed design of the Bradshaw Terminal and Rail Run-around facilities would be consistent with all applicable land use policies and regulations. Therefore, implementation of the facilities on the Bradshaw Terminal and Rail Run-around sites would not conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. No impact would occur.

4.12 Mineral Resources

	Potentially Significant Impact	Less-than-Significant w/ Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
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?			✓	
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?			✓	

a, b) 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? (Less than Significant)

The Project site is located within an area classified as Mineral Resources Zone 2 (MRZ-2) in the *Sacramento County General Plan of 2005-2030* (Sacramento County 2011). “Areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists.”. The site is currently developed, urbanized and has the current land use designation of “Office-Industrial Mixed Use” as per the Folsom Boulevard Specific Plan which does not include mining as an allowable use. Minimal grading and excavation would occur during Project construction, preserving any mineral resource that may exist on site.

The Rancho Cordova General Plan defines “Mineral Resource” as “Land on which known deposits of commercially viable mineral or aggregate deposits exist.” This designation is applied to sites determined by the State Division of Mines and Geology as being a resource of regional significance, and is intended to help maintain the quarrying operations and protect them from encroachment of incompatible land uses.” The impact would be less than significant.

4.13 Noise

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

Potential noise impacts were evaluated based on the findings of an environmental noise assessment performed by Illingworth & Rodkin (Illingworth & Rodkin 2022, Appendix D).

A noise monitoring survey was performed from Wednesday, January 12, 2022, through Wednesday, January 19, 2022. The survey included four long-term (LT) noise measurements and seven short-term (ST) noise measurements to quantify existing ambient noise levels. Sites were selected to characterize the ambient noise levels in the vicinity of the Project site. Detailed data for the existing noise environment is provided in Appendix D. As shown in Appendix D, the existing ambient noise environment in the area includes:

- Trains generating maximum instantaneous noise levels of 82 to 85 dBA Lmax, with occasional trains generating maximum instantaneous noise levels as high as 100 to 102 dBA Lmax.
- Trains sounding horns near road intersections
- Daytime hourly average noise levels, which included all train activity, ranged from 49 to 81 dBA Leq during the weekdays and 45 to 78 dBA Leq during Saturdays and Sundays, depending on the location.

a) Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? (Less than Significant)

The closest residences along the rail run-around track include residences at the mobile home park (Park Royal Estates and Briarwood Mobile Homes) and commercial properties to the south, and residences along Black Coral Way to the north across Folsom Boulevard. Residences along Londonderry Drive to the north across Folsom Boulevard and the VCA Sacramento Veterinary Referral Center south of the existing UPRR tracks are the nearest receptors to the terminal.

A significant noise impact would be identified if the Project would generate a substantial temporary or permanent noise level increase over ambient noise levels at existing noise-sensitive receptors surrounding the Project site and that would exceed applicable noise standards presented in the General Plan at existing noise-sensitive receptors surrounding the Project site.

Construction

City Municipal Code Section 6.68.090(E) limits construction to weekdays between 6:00 a.m. and 8:00 p.m., and weekends between 7:00 am and 8:00 p.m. Noise limits identified by the Federal Transit Administration (FTA) are used to identify the potential for impacts due to substantial temporary construction noise. A significant noise impact would be identified if temporary construction activity would cause a substantial increase in ambient noise levels at sensitive receptors. Large or complex projects involving substantial on-going noise-generating construction activities are considered significant when noise levels would exceed 80 dBA Leq at residential land uses near the site or 90 dBA Leq at commercial land uses near the site for more than 12 months within the allowable workdays and work hours. As summarized in Section 2.5, the Applicant would implement best management practices to reduce construction noise levels emanating from the site.

Noise impacts resulting from construction depend upon the noise generated by various pieces of construction equipment, the timing and duration of noise-generating activities, and the distance between construction noise sources and noise-sensitive areas. Construction noise impacts primarily result when construction activities occur during noise-sensitive times of the day (e.g., early morning, evening, or nighttime hours), the construction occurs in areas immediately adjoining noise-sensitive land uses, or when construction lasts over extended periods of time.

Construction activities would be carried out in stages. During each stage of construction, there would be a different mix of equipment operating, and noise levels would vary by stage and vary within stages, based on the amount of equipment in operation and the location at which the equipment is operating. Typical construction noise levels at a distance of 50 feet are shown in Table 4.13-1. The table shows the average noise level ranges, by construction phase. Construction-generated noise levels drop off/increase at a rate of about 6 dBA per doubling/halving of the distance between the source and receptor. Shielding by buildings or terrain can provide an additional 5 to 10 dBA noise reduction at distant receptors.

Table 4.13-1 Typical Ranges of Construction Noise Levels at 50 Feet, L_{eq} (dBA)

	Domestic Housing		Office Building, Hotel, Hospital, School, Public Works		Industrial Parking Garage, Religious Amusement & Recreations, Store, Service Station		Public Works Roads & Highways, Sewers, and Trenches	
	I	II	I	II	I	II	I	II
Ground Clearing	83	83	84	84	84	83	84	84
Excavation	88	75	89	79	89	71	88	78
Foundations	81	81	78	78	77	77	88	88
Erection	81	65	87	75	84	72	79	78
Finishing	88	72	89	75	89	74	84	88

Source: U.S.E.P.A., Legal Compilation on Noise, Vol. 1, p. 2-104, 1973; Illingworth and Rodkin 2022

Notes:

I - All pertinent equipment present at site.

II - Minimum required equipment present at site.

Construction Noise at Bradshaw Terminal Site

Construction of the Bradshaw Terminal improvements would include clearing and grubbing, grading, paving, tank installation, trenching/piping, and rail installation phases. Hourly average noise levels resulting from standard construction equipment used for these phases was calculated to range from 80 to 90 dBA Leq at 50 feet using the Federal Highway Administration's (FHWA) Roadway Construction Noise Model (RCNM). Construction equipment would likely be spread throughout the site, but for the purposes of modelling the worst-case scenario, all equipment was assumed to be operating relatively in the same area around the south and southeastern portion of the terminal near the proposed new rail spurs and new road extension areas for truck circulation and staging. Noise propagation distances were estimated from this 'acoustic center' to the property lines of surrounding receptors. No shielding effects were assumed.

Residential properties closest to the Bradshaw Terminal site (along Londonderry Dr) are located about 1,000 feet away from the 'acoustic center' of the site, and the nearest commercial properties are positioned about 500 feet away. At these distances, construction noise levels would range from 55 to 65 dBA Leq at the nearest residences and from 60 to 70 dBA Leq at the nearest commercial properties for construction noise emanating from the terminal.

With the implementation of Environmental Protection Action 6, which limits the hours of construction in accordance with the City's municipal code, and recognizing that noise generated by construction activities would occur over a temporary period of less than one year, the activity would be exempt from the City's exterior noise standards and the impact would be less-than-significant.

Construction Noise at Rail Run-around Site

For the construction of the proposed rail run-around, a range of anticipated noise levels is presented to account for both the worst-case scenario when construction occurs closest to the adjacent properties at about 20 feet and the situation where construction proceeds linearly and would occur further away at a distance of about 300 feet from the same properties along the run-around.

Noise levels emanating from the construction of the proposed rail run-around would range from 88 to 98 dBA Leq at a distance of 20 feet and from 65 to 75 dBA Leq at a distance of 300 feet from the closest commercial properties, as the rail construction proceeds to completion adjacent to the UPRR tracks. For residences across Folsom Boulevard along Black Coral Way, noise levels from the construction of the run-around would range from 68 to 78 dBA Leq at a distance of about 200 feet.

With the implementation of Environmental Protection Action 6, and recognizing that noise generated by construction activities would occur over a temporary period of less than one year, the impact would be less-than-significant.

Operation

Operational noise sources include rail noise, truck loading and circulation, and mechanical equipment operating at the terminal. Rail noise sources include rail activity at the terminal, the proposed run-around track, and the length of the UPRR track connecting the two.

Railcars would be delivered from west to east and empty railcars would leave the terminal from east to west. These railcars are expected to travel at approximately 5-10 miles per hour. The following sequence of train operations are expected to occur over a period of 45 minutes to 1 hour for each delivery per day:

- Full rail cars dropped at the run-around
- Train engine taken to the terminal site
- Empty rail cars pulled out to the run-around
- Full rail cars taken to the terminal site
- Empty rail cars picked up from the run-around and hauled out of the area

It is anticipated that the rail deliveries and pickup operations would occur in the evening, between 7 p.m. and 9 p.m., up to 5 times per week. The primary sources of noise anticipated would be switcher engine and railcar movements, idling locomotives, and horns sounded at grade crossings. Based on Report WCR 73-54, typical noise levels produced by switcher engine movements when transferring railcars to and from a run-around are about 76 to 80 dBA at 100 ft, while idling locomotives produce a noise level of about 65 to 71 dBA at 100 ft. Railcar impacts of single or multiple cars into parked cars or chain reaction impacts could produce maximum noise levels of up to 91 dBA at 100 ft.

Table 4.13-2 Summary of Typical Maximum Noise Levels from Rail Activities

Noise Source	Noise Levels at 100 ft from Source (L_{max}, dBA)	Calculated Noise Level (dBA)			
		Commercial Properties and Mobile Homes adjacent to Run-Around Track (30 ft)	Commercial VCA Veterinary Referral Center[1]	Residences along Londonderry Drive (200 ft)	Residences along Black Coral Way (200 ft)
Switcher engine movements	76 to 80	87 to 91	77 to 81	70 to 74	70 to 74
Idling locomotives	65 to 71	--[2]	50 to 56	59 to 65	59 to 65
Intermittent railcar impacts	91	101	76	85	85

Notes:

1. Switcher engine movements for the VCA center are about 85 feet away while noise from idling locomotives and intermittent railcar impacts are about 580 feet away.
2. Idling locomotives are not expected at the run-around track.

Residences across Folsom Boulevard (on Londonderry Drive and Black Coral Way) and at the mobile home park would benefit from existing noise barriers that would reduce the calculated noise levels in Table 4.13-2 by at least 5 dB. Noise from switcher engine movements and railcar impacts would be intermittent and occur only a few times within one hour each evening with no anticipated nighttime events. Train horns are not expected during onsite rail activities.

The existing ambient noise environment in the proximity to residences across Folsom Boulevard along Londonderry drive includes trains and traffic along Folsom Boulevard typically generating maximum instantaneous noise levels of 82 to 85 dBA Lmax, with occasional maximum instantaneous noise levels as high as 100 to 102 dBA Lmax. The existing ambient noise environment in proximity to the residences in the mobile home park include trains typically generating maximum instantaneous noise levels of 68 to 75 dBA Lmax, with occasional trains generating maximum instantaneous noise levels as high as 85 dBA Lmax. Therefore, the anticipated Project-generated noise is consistent with the existing noise environment and

would not generate a new or substantially increased noise impact. Additionally, UPRR rail activity is not subject to City regulations.

Operational Noise at Bradshaw Terminal Site

Noise from train and truck activities at the terminal are assessed using the applicable thresholds established in Table N-1 and Policy N.2.2 from the City's General Plan. General Plan Table N-1 establishes maximum daytime and nighttime noise standards for projects affected by or including non-transportation noise sources. General Plan Policy N.2.2 is related to roadway projects, and identifies numeric thresholds for determining significance of traffic noises. For the purposes of a conservative analysis, this analysis uses a combination of standards from N-1 and Policy N.2.2 to assess the significance of noise impacts from anticipated Project traffic.

For the VCA Veterinary Referral Center, hourly average noise levels calculated from the maximum train noise levels anticipated in Table 4.13-2 would be about 50 dBA Leq. Existing ambient noise levels around the anticipated hours of train operations are measured to be 60 dBA Leq.

Residences along Londonderry Drive would experience hourly average noise levels of about 48 dBA Leq based on maximum train noise levels anticipated in Table 4.13-2. Existing ambient noise levels around the anticipated hours of train operations are measured to range from 60 to 65 dBA Leq adjusted for the shielding from the existing noise barrier.

Truck activities (loading, offloading, staging and circulation) are expected to occur throughout the terminal, with new staging and turn around areas proposed towards the southern end. Trucks maneuvering at the different existing and proposed loading racks would generate a combination of engine, exhaust, tire noise, as well as intermittent sounds from truck fuel filling, back-up alarms and releases of compressed air associated with truck/trailer air-brakes. Short term noise measurements at the site next to the current truck filling station show noise levels ranging from 60 to 70 dBA at 50 feet for loading, and 70 to 80 dBA at 50 feet for trucks passing by. Back up alarms and brake releases generate maximum noise levels typically in the range of 80 to 90 dBA at 5 feet.

Truck filling operations would take place towards the eastern portion of the terminal close to the proposed rail spurs, with trucks circulating throughout the site. For the purposes of modelling the worst-case noise scenario, noise from trucks is modeled from the staging and turnaround locations closest to corresponding residential or commercial properties.

Residences along Londonderry Drive are located about 500 feet from the nearest existing truck loading rack. Future proposed areas of truck activities would be positioned at a distance of more than 1,000 feet away from these residences. Commercial properties along Business Park Drive would be located about 200 feet from the closest proposed truck staging and turnaround areas. Table 4.13-3 shows the summary of noise levels anticipated from truck operations along with the calculated noise levels at the nearest receptors.

Table 4.13-3 Summary of Typical Maximum Noise Levels from Truck Activities

Noise Source	Noise Levels at 50 ft from Source (L_{max}, dBA)	Calculated Noise Levels	
		Commercial properties (200 ft)	Residences along Londonderry Dr (500 ft)
Truck filling	60 to 70	48 to 48	40 to 50
Truck passing by	70 to 80	58 to 68	50 to 60

Noise Source	Noise Levels at 50 ft from Source (L_{max}, dBA)	Calculated Noise Levels	
		Commercial properties (200 ft)	Residences along Londonderry Dr (500 ft)
Back-up alarms and brake releases	80 to 90[1]	48 to 58	40 to 50

Notes:

1. Measured at 5 feet.

As previously discussed, the closest residences across Folsom Boulevard (on Londonderry Drive) would benefit from the existing noise barrier which would provide a noise reduction of up to 5 dBA for sounds propagating due to truck activities from the site.

For residences and commercial properties located near the terminal, noise levels calculated from truck loading and circulation activities would be significantly less than noise levels anticipated from rail activities at the terminal. Truck activities do not make a significant contribution to the total noise emanating from the terminal resulting from both train and truck noise sources.

Noise-generating mechanical equipment included in the Project would be limited to pump loading and offloading activities throughout the site. These activities would not make a significant contribution to total noise emanating from the terminal.

Noise levels from operations at the terminal will be less than the established 50 dBA hourly Leq thresholds in Table N-1 from the City's General Plan and less than existing ambient noise levels ranging from 55 to 65 dBA Leq during the operating hours. For an existing noise environment ranging from 60 to 65 dBA Ldn at the nearest residential and commercial receptors, a 3 dB Ldn increase in noise levels would be considered significant based on Policy N.2.2. from the City's General Plan. Noise from train and truck activities at the terminal would be calculated to result in a noise increase of 1 dBA Ldn or less.

Noise thresholds established by the standards under Table N-1 and Policy N.2.2., along with existing ambient noise conditions in the area, are not expected to be exceeded by operations at the terminal. This is a less-than-significant impact.

Operational Noise at Rail Run-around Site

Noise generating activities accommodated by UPRR within the SacRT right-of-way, are assessed using the applicable thresholds established in Policy N.2.2 from the City's General Plan. As stated within the prior section, General Plan Policy N.2.2 is related to roadway projects and identifies numeric thresholds for determining significance of traffic noises. Although the Project is not a roadway project, this analysis uses the numeric thresholds from Policy N.2.2 to assess the significance of noise impacts from anticipated Project traffic. UPRR rail activity is not subject to City regulations.

Noise propagating from the terminal, elaborated above, would not contribute to noise levels experienced at the residences along Black Coral Way. The main source of noise at this location would be noise from train activities at the run-around track. Table 4.13-2 shows a summary of noise levels anticipated from the sequence of train operations on the run-around track. Hourly average noise levels calculated from the maximum noise levels in Table 4.13-2 would be about 51 dBA Leq. The existing ambient hourly noise level from traffic along Folsom Boulevard and through trains, during the proposed hours of operation, is about 63 dBA Leq when adjusted for the acoustical shielding provided by the existing noise barrier. The existing daily average noise level at the vicinity of the residences ranges from 66 to 68 dBA Ldn when adjusted for the

acoustical shielding provided by the existing noise barrier. Based on City General Plan Policy N.2.2, for an existing noise environment with a daily average level of greater than 65 dB Ldn, a 1.5 dB Ldn increase in noise levels would be considered significant. Noise from train activities on the run-around track is calculated to result in a noise increase of less than 1 dBA Ldn for residences across Folsom Boulevard along Black Coral Way.

At the mobile home parks (Park Royal Estates, Briarwood Mobile Home Parks) located adjacent to the run-around track, maximum intermittent noise levels from rail activities are calculated to range from 82 to 96 dBA Lmax (assuming shielding from the existing noise barrier). Existing maximum noise levels resulting from traffic and through trains range from 75 to 80 dBA Lmax throughout the day. These new noise sources would be of a different character than the noise from existing trains and traffic in the area and therefore would be noticeable near the run-around track.

The hourly average noise level calculated from these maximum noise levels would be about 66 dBA Leq during the hour of train operations. This would correspond to a daily average noise level increase of 1 dBA Ldn. The existing daily average noise level in the area is calculated to be 60 dBA Ldn. Based on Policy N.2.2, for an existing noise environment with a daily average level between 60 and 65 dBA Ldn, a 3 dB Ldn increase in noise levels would be considered significant. Therefore, a less-than-significant impact would result from rail activities anticipated along the proposed run-around.

Operational Noise from Project Traffic and Increased Train Activity Outside the Immediate Project Area

Noise generating activities from rail or truck traffic are assessed using the applicable thresholds established in Policy N.2.2 from the City's General Plan. The Project's 20,000 BPD throughput would result in 112 new truck loads which correspond to 224 new truck trips per day. The Project's 3 to 5 employees would generate 10 daily non-truck trips. Based on the VMT and Trip Generation Memorandum (Appendix E), noise levels for peak hour truck trips and light vehicle trips were modelled and compared to the existing ambient environment in the vicinity of the Project. Projected noise level increases from increased truck trips and light vehicles around the Project site would result in a noise level increase of less than 1 dBA Ldn. This increase is less than the most restrictive criterion established in Policy N.2.2 (+1.5 dBA Ldn).

Based on the U.S. DOT Crossing Inventory for the Rancho Cordova area, a total of 4 switching trains per day travel on the UPRR tracks near the Bradshaw Terminal. A total of 134 SacRT light-rail trains travel on the SacRT train tracks adjacent to the UPRR tracks. With the construction of the new rail spurs and run-around tracks for the Project, the UPRR tracks will accommodate one more train (with 22 railcars) up to 5 times a week between 7 p.m. to 9 p.m. for about 45 minutes to an hour. An addition of one train to the existing train movements (134 SacRT trains plus 4 switching trains) in the area would not result in an increase in noise levels above the measured ambient levels in the vicinity of the terminal.

Permanent noise increases from Project traffic and increased train activity would result in a less-than-significant impact.

b) Result in generation of excessive groundborne vibration or noise levels? (Less than Significant)

Construction

The City of Rancho Cordova does not specify a construction vibration limit. The Federal Transit Administration's (FTA) Noise and Vibration Impact Assessment Manual includes Construction Vibration

Damage Criteria to be used in assessing construction vibration impacts (Table 4.13-4). The FTA manual also discusses vibration annoyance criteria as discussed above.

Table 4.13-4 Vibration Damage Criteria

Building/Structural Category	PPV, in/sec	Approximately L_v[1]
I. Reinforced-concrete, steel or timber (no plaster)	0.5	102
II. Engineered concrete and masonry (no plaster)	0.3	98
III. Non-engineered timber and masonry buildings	0.2	94
IV. Buildings extremely susceptible to vibration damage	0.12	90

Notes:

1. RMS velocity in decibels, VdB re 1 µin/sec

Source: Transit Noise and Vibration Impact Assessment Manual, Federal Transit Administration, Office of Planning and Environment, U.S. Department of Transportation, FTA Report No. 0123, September 2018.

The 0.3 in/sec PPV vibration limit (or 98 VdB) would be applicable to the majority of buildings in the vicinity of the Project. The 0.12 in/sec PPV (or 90 VdB) vibration limit would only apply to the vibration levels expected at the Old Mills Winery building located near the proposed rail run-around adjacent to the existing UPRR tracks.

The construction of the Project may generate perceptible vibration when heavy equipment or impact tools (e.g., jackhammers, hoe rams) are used. Construction activities include clearing and grubbing, grading, paving, tank installation, trenching/piping, and rail installation phases. Pile driving is not anticipated for the proposed Project. Vibration levels would vary depending on soil conditions, construction methods, and equipment used. Vibration levels are highest close to the source, and then attenuate with increasing distance at the rate (Dref/D)1.1, where D is the distance from the source in feet, and Dref is the reference distance of 25 feet. Table 4.13-4 presents typical vibration levels that could be expected from construction equipment at 25 feet and summarizes the minimum distances needed from each equipment to meet the 0.12 in/sec PPV and the 0.3 in/sec PPV vibration threshold.

For a worst-case scenario, construction vibration levels (as shown in Table 4.13-5) are modeled under the assumption that each piece of equipment would operate along the nearest boundary of the site or proposed run-around. Vibration sensitive structures near Project construction include the VCA Veterinary Referral Center (about 75 feet away), CalCap Studios located in the Old Mills Winery building (about 200 feet away) and the Briarwood Mobile Home Park residences (about 20 feet away).

Table 4.13-5 Vibration Levels for Construction Equipment at Various Distances

Equipment		PPV at 25 ft (in/sec)	Minimum Distance to Meet Threshold (feet)	
			Old Mills Winery Building *0.12 in/sec PPV*	All Other Buildings *0.3 in/sec PPV*
Clam Shovel Drop		0.202	**40**	20
Hydromill (slurry wall)	In soil	0.003	<5	<5
	In rock	0.006	<5	<5
Vibratory Roller		0.210	**40**	20

Equipment	PPV at 25 ft (in/sec)	Minimum Distance to Meet Threshold (feet)	
		Old Mills Winery Building *0.12 in/sec PPV*	All Other Buildings *0.3 in/sec PPV*
Hoe Ram	0.089	20	10
Large Bulldozer	0.089	20	10
Caisson Drilling	0.089	20	10
Loaded Trucks	0.076	20	10
Jackhammer	0.035	10	<5
Small Bulldozer	0.003	<5	<5

Source: Transit Noise and Vibration Impact Assessment, United States Department of Transportation, Office of Planning and Environment, Federal Transit Administration, October 2018 as modified by Illingworth & Rodkin, Inc., March 2022.

Based on the calculated distances to meet the vibration damage thresholds for buildings in the vicinity of the Project, vibration due to Project construction would fall below the 0.12 in/sec PPV threshold for the Old Mills Winery building (at 200 feet) and at or below the 0.3 in/sec PPV threshold (at distances greater than 20 feet) for all other buildings.

The US Bureau of Mines has analyzed the effects of blast-induced vibration on buildings in USBM RI 85077, and these findings have been applied to vibrations emanating from construction equipment on buildings. Figure 6 presents the damage probability, as reported in USBM RI 8507 and reproduced by Dowding, assuming a vibration level of 0.3 in/sec PPV. Based on the data summarized in Figure 6, there would be no observations of “threshold damage,” “minor damage,” or “major damage” at buildings of normal conventional construction when vibration levels were 0.3 in/sec PPV or less.

At these locations and in other surrounding areas where vibration would not be expected to cause structural damage, vibration levels may still be perceptible. However, as with any type of construction, this would be anticipated and would not be considered significant, given the intermittent and short duration of the phases that have the highest potential of producing vibration. By use of administrative controls, such as notifying neighbors of scheduled construction activities and scheduling construction activities with the highest potential to produce perceptible vibration during hours with the least potential to affect nearby residences, perceptible vibration can be kept to a minimum.

In summary, the construction of the Project would generate vibration levels below the 0.12 in/sec PPV threshold at the ‘historic’ Old Mills Winery Building located about 200 feet away from the proposed rail run-around. For all other conventional buildings in the vicinity of the terminal and the run-around, vibration levels would be 0.3 in/sec PPV or less. This is a less-than-significant impact.

Operation

The Project would install a new rail run-around on the SacRT right-of-way for railcar delivery purposes. This run-around would be designed to accommodate 22 railcars and would be located about 14 feet from the center of the existing UPRR rail line. Switching operations are expected to occur between the run-around and the Bradshaw Terminal rail spurs. Rail operations on the new spurs and the run-around have the potential to cause impacts on vibration-sensitive land uses in the vicinity of the Project site. The VCA Sacramento Veterinary Referral center located about 75 feet from the center of the UPRR tracks, and the CalCap studios within the Old Mills Winery building located about 200 feet from the proposed rail run-

around tracks constitute the nearest vibration-sensitive commercial properties. The Briarwood Mobile Homes, positioned about 20 feet away, are the nearest vibration sensitive residences next to the UPRR tracks at the proposed rail run-around.

Based on the General Vibration Assessment outlined in the Transit Noise and Vibration Impact Assessment Manual, freight trains moving on the spurs and rail run-around at speeds of 5 to 10 mph would be calculated to generate vibration levels of about 71 to 77 VdB at a distance of 20 feet. These calculated vibration levels fall below the established FTA annoyance thresholds of 80 VdB for Category 2 – Residences and buildings where people normally sleep and 83 VdB for Category 3 – Institutional land uses with primarily daytime for “Infrequent Events” (less than 30 per day) in Table 5 of the FTA’s guidance. These levels also fall below the vibration damage criteria established in Table 4.13-4. Additionally, vibration levels measured for the existing SacRT light-rail trains at about 45 feet from the eastbound tracks are 77 VdB, which equal or exceed Project-related operational vibration levels.

In conclusion, vibration from train operations at the terminal and the run-around, when compared with the established vibration damage and annoyance thresholds and the existing vibration environment in the area, would result in a less-than-significant impact.

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? (No Impact)

The nearest public airport to the Project site is the Sacramento Mather Airport (Mather Airport), located approximately 1.5 miles to the south of the Project site. The Project site is located within the Review Area of the Airport Influence Area, as identified in the Mather Airport’s Airport Land Use Compatibility Plan (ALUCP), but is within the CNEL 60 dB zone (SACOG 2020). Per the Mather Airport ALUCP, if a Project is located within the 60 dB CNEL contour, then the Project is considered compatible with the noise compatibility criteria and policies provided in this ALUCP. No impact would result.

4.14 Population and Housing

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

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)? (No Impact)

The proposed Project would result in new rail spurs and unloading equipment with the capacity to offload up to 22 railcars per day. Additionally, storage of Renewable Diesel would be created, and Bio Diesel storage would be increased. The Project would require 3-5 new employees. The existing housing supply in the area would sufficiently accommodate this number of employees. The Project would not directly or indirectly induce substantial population growth. No impact would result.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? (No Impact)

No housing or people would be displaced by the Project and no replacement housing would be required. No impact would result.

4.15 Public Services

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

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for public services? (No Impact)

As discussed in Section 4.14, Population and Housing, the Project would not directly or indirectly induce substantial population growth nor create substantial new demand for services. Therefore, the Project would have no impact on the service ratios, response times, or other performance objectives of schools, parks, and other public facilities that are based on population growth. Fire and police service levels provided to the existing Kinder Morgan facilities would continue to be sufficient. The Project would not require a new or physically altered government facility to serve the Project site. No impact would occur.

4.16 Recreation

	Potentially Significant Impact	Less-than-Significant w/ Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
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?				✓
b) Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?				✓

a,b) 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, or include or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment? (No Impact)?

As discussed in Section 4.14, Population and Housing, implementation of the Project would not induce population growth. The use of existing neighborhood and regional parks or other recreational facilities would not change as result of the Project. The Project would not include construction activities within an existing recreational property or require new or expanded recreational facilities. No impact would result.

4.17 Transportation

	Potentially Significant Impact	Less-than-Significant w/ Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			✓	
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?				✓
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			✓	
d) Result in inadequate emergency access?			✓	

a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? (Less than Significant)

Construction of the Project would result in a short-term increase in vehicle trips on local roadways, including Folsom Boulevard and Bradshaw Road. The addition of construction-related vehicles would not substantially affect congestion on local roadway segments because trips would occur at differing periods of the day and would represent a small percentage of the capacity of the roadways. Construction-related truck traffic would access the Bradshaw Terminal site from Gore Road. Construction-related truck traffic would access the Rail Run-around site from Routier Road. No construction work would be conducted within the public right-of-way. Therefore, construction activities would not result in substantial adverse effects or conflicts with the local roadway system. The impact would be less than significant.

Construction of the Project would result in a short-term increase in vehicle trips on local roadways, including on Bradshaw Road and Folsom Boulevard. As discussed in the Section 2.3, Project Construction, of this Initial Study, the Applicant estimates that the Project would require soils import for the Rail Run-around site, which could generate an estimated 228 haul truck trips over the course of grading.

The addition of construction-related traffic would occur during daytime hours between 6:00 AM to 8:00 PM Monday through Friday, and 7:00 AM to 8:00 PM on weekends and would not substantially affect congestion on local roadway segments because trips would occur at differing periods of the day and would represent a small percentage of the capacity of the roadways. Construction would not require installation of water distribution lines or other utility improvements within roadways or other public rights of way that could affect traffic access or flow.

Following construction, the Project would result in a minor increase in traffic from new employees and third-party vendors. However, Project operations would not conflict with existing transit routes or stops or bicycle and pedestrian facilities, and would not introduce new users of alternative modes of transportation into the area. The operational impact would be less than significant.

See impact c, below for a discussion of potential impacts relative to traffic hazards during construction.

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)? (No Impact)

In November 2017, the Governor's Office of Planning and Research (OPR) released a technical advisory containing recommendations regarding the assessment of vehicle miles travelled (VMT). VMT refers to the amount and distance of automobile travel attributable to a project. The term "automobile" refers to on-road passenger vehicles, specifically cars and light trucks. The movement of heavy trucks and equipment associated with the construction of the Project is not considered for the purposes of determining transportation impacts under this section. Additionally, the movement of heavy trucks (vendor vehicle activity) during Project operations is not considered for the purposes of determining transportation impacts, as heavy vehicle trips are generally not meant to be the standard for VMT analysis.

CEQA Guidelines § 15064.3, Subdivision (b) indicates that land use projects would have a significant impact if the project resulted in VMT exceeding an applicable threshold of significance. It further notes that if existing models or methods are not available to estimate the VMT for the project being considered, a lead agency may analyze the project's VMT qualitatively.

The City of Rancho Cordova has adopted the *Transportation Impact Guidelines* to assist projects in assessing transportation impacts under CEQA pursuant to SB 743 and CEQA Guidelines § 15064.3, Subdivision (b) (Rancho Cordova 2020). The City's guidance contains screening criteria, significance thresholds, analysis methodology, and mitigation recommendations. The Project was evaluated using the City's guidance, and the VMT and Trip Generation Memorandum is provided as Appendix E to this Initial Study.

Per the City's guidance, projects that meet at least one of the identified VMT screening criteria would have a less than significant VMT impact due to project characteristics and/or location. The City has confirmed that the Project meets the following screening criteria:

3. ***Industrial Project Located in a VMT Efficient Area****: The project is an industrial project located in "VMT efficient area" (at or below the base year city-wide average VMT/employee) based on the adopted location-based screening map by the City using its focused version of SACOG's SACSIM19 regional model.*

5. ***Small Project****: The project is a small project defined as generating less than 237 daily unadjusted trips ends using the latest ITE trip generation rates/procedures or a project-specific trip generation analysis reviewed and accepted by the City.*

As described in Section 2.4, Operation and Maintenance, the Project's 3-5 new employees would generate 10 daily passenger vehicle (non-truck) trips. Using the existing truck to non-truck trip ratios, total passenger car trip generation under the proposed Project would total up to 32 trips per day. The Project's passenger vehicle trip generation is below the 237 daily trips threshold for 'Small Project'.

Therefore, additional analysis is not required. The Project would not conflict with or be inconsistent with an applicable threshold of significance adopted per CEQA Guidelines section 15064.3, subdivision (b). No impact would result.

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

The Project would not alter the existing alignment of the surrounding streets. Construction traffic would access the Bradshaw Terminal site from Gore Road. Construction-related truck traffic would access the Rail Run-around site from Routier Road. The affected streets are fully developed with signalized intersections and a comprehensive sidewalk network. As such, the surrounding street network can adequately accommodate the car and light truck traffic related to the construction and operation of the site. The impact would be less than significant.

Construction

Construction of the Project is proposed to begin in summer of 2022 and would be completed over an approximately 5-month period. The number of construction-related vehicles traveling to and from the Project site would vary on a daily basis. The heaviest traffic days are anticipated to require up to 11 haul truck trips on a peak construction day. In addition to haul trucks, it is anticipated that construction crew trips could require up to 80 trips per day (40 workers). Therefore, on the busiest days of construction, approximately 91 vehicle trips could occur. No construction activities would occur within roads or the public right of way. Therefore, the Project would not modify, even temporarily, driveway or roadway configurations, turning radii, or lane widths. The temporary construction-related impact would be less than significant.

Operation

Access to the Project facilities would be accomplished through the existing campus drives and internal paved facilities. The existing driveway on Gore Road would continue to provide the primary access to the campus from the regional street network and would retain its current configuration with no proposed modifications. The Project's impact related to creating potential hazards due to geometric design features or incompatible uses would be less than significant.

d) Result in inadequate emergency access? (Less than Significant)

The Bradshaw Terminal includes existing fire access and fire infrastructure within the terminal. The Project includes new traffic circulation improvements within the Bradshaw Terminal, including a new interior road extension and truck turnaround. The proposed roadways have been designed consistent with fire access road parameters, including preservation of existing remote fire access roadways.

Emergency access to the Bradshaw Terminal would continue to be accomplished through the existing Gore Road drive and internal paved facilities; these drive and facilities would remain open and unaltered during Project construction. As noted above, the existing driveway on Gore Road would continue to provide the primary access to the terminal from the regional street network and would retain its current configuration with no proposed modifications. Therefore, emergency access is expected to be acceptable. The impact would be less than significant.

4.18 Tribal Cultural Resources

	Potentially Significant Impact	Less-than-Significant w/ Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a tribal cultural resource listed or eligible for listing in the California Register of Historic Resources, or in a local register of historic resources as defined in Public Resources Code section 5020.1(k)?		✓		
b) Cause a substantial adverse change in the significance of a tribal cultural resource that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to the criteria set forth in subdivision (c) of the Public Resources Code section 5024.1? In applying the criteria set forth in subdivision (c) of the Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.		✓		

a, b) Cause a substantial adverse change in the significance of a tribal cultural resource listed or eligible for listing in the California Register of Historic Resources, or in a local register of historic resources as defined in Public Resources Code section 5020.1(k)? (Less than Significant with Mitigation)

CEQA requires lead agencies to determine if a proposed Project would have a significant effect on tribal cultural resources. The CEQA Guidelines define tribal cultural resources as: (1) a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe that is listed or eligible for listing on the California Register of Historical Resources, or on a local register of historical resources as defined in Public Resources Code Section 5020.1(k); or (2) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant according to the historical register criteria in Public Resources Code Section 5024.1(c), and considering the significance of the resource to a California Native American tribe.

Efforts to identify tribal cultural resources that could be affected by the Project included a records search at the North Central Information Center, literature review, a sacred lands search through the Native American Heritage Commission (NAHC), contact with appropriate local Native American Tribes, and a pedestrian archaeological survey of the Project site.

No information has been received from the NAHC regarding a search of the NAHC's Sacred Lands File for Sacred Sites. The NAHC provided a list of other tribes culturally affiliated with the area. On February 17, 2022, ASC contacted these California Native American tribes culturally affiliated with the Project area via email and sent hard copies of the consultation letters via certified mail. On March 31, 2022, the Wilton Rancheria responded saying they have knowledge of 3 culturally significant sites within 2 miles of the

Project. Additionally, the Project site is close to the American River, which the Wilton Rancheria identified as having tribal cultural affiliation. The tribe requested tribal monitoring during ground disturbance.

Mitigation Measures

Implementation of Mitigation Measures CR-1 (Archaeological Inadvertent Discovery Procedures), and CR-2 (Protect Human Remains If Encountered during Construction) would be required for the Project (please see Section 3.5, Cultural Resources for a full description of these mitigation measures). Additionally, Mitigation Measure TR-1 would be required for the Project.

Implementation of Mitigation Measures CR-1, CR-2, and TR -1 would reduce the potential impact to previously undiscovered tribal cultural resources to a less-than-significant level by requiring procedures to be taken in the event of inadvertent discovery of resources consistent with appropriate laws and requirements, as well as incorporating tribal monitoring due to the sensitive nature of the area .

Mitigation Measure TR-1: Tribal Inspection of Subsurface Soils

To accommodate any necessary security clearance, no less than five working days before the start of construction, the contractor shall notify the Wilton Rancheria Cultural Preservation Department about the start date of ground disturbing activities. The tribe will be given the opportunity to send a tribal monitor to inspect the subsurface soils once during the first five days of ground disturbing activity on the project. Should the tribe choose not to send a monitor to perform the inspection within the first five days, work can continue as long as the notice was provided and documented.

4.19 Utilities and Service Systems

	Potentially Significant Impact	Less-than-Significant w/ Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electrical power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			✓	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			✓	
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			✓	
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			✓	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			✓	

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electrical power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? (Less than Significant)

Water

The Project would temporarily utilize water for dust suppression and other activities during construction. Construction-related water demands would be short-term and minimal in volume. No new or expanded facilities would be needed to supply dust-suppression water.

Following construction, the Project would utilize water for staff use in the new modular office. The potable water demand of 5 new staff is anticipated to be marginal. Other than a lateral connection to the existing water line, no new or expanded infrastructure would be required to serve the new office. In addition, existing entitlements would be sufficient to serve the operational phase of the Project. Therefore, no new or expanded water facilities would be required. No impact would occur.

Wastewater

The Project would result in an increase of 5 new employees on the Bradshaw Terminal site, which would result in an increase in use of the restrooms and kitchen facilities. However, this is not anticipated to

generate a significant amount of wastewater. The existing transmission pipelines and wastewater treatment plant is anticipated to have sufficient capacity to serve the Project. Therefore, the Project would not require construction of a new or expanded wastewater treatment facility. No impact would occur.

Storm Water

Storm water associated with new impervious surfaces would be collected via proposed on-site storm water features, which would be designed to comply with the Stormwater Quality Design Manual for the Sacramento Region. Storm water generated by Project hardscapes would be released at the same rate as pre-project conditions during an applicable design storm, and would discharge to the existing stormwater infrastructure adjacent to the Project site. With implementation of the proposed on-site storm water infrastructure, the capacity of the existing storm water drainage system would be adequate to serve the Project. Therefore, no additional off-site storm water improvements are anticipated to be required to accommodate runoff from the Project. The impact would be less than significant.

Other Utilities

Electrical energy for the Project would be provided by SMUD. Gasoline and other petroleum products used for this Project would be obtained from private retailers throughout the general area. Energy-consuming equipment anticipated to be used during operation of the Project includes mechanical and electrical equipment associated with rail unloading, pumping, truck loading, and new modular building. The new facilities would be a new source of energy demand. However, all systems would be designed for energy efficiency and be consistent with existing zoning and building codes. Overall, the addition of the new facilities is not anticipated to demand a significant amount of energy such that it would require new or expanded off-site infrastructure. No additional electrical, natural gas, or telecommunication facilities or expansion of existing facilities would be required to serve the Project. The impact would be less than significant.

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

As discussed in Impact a, the Project would require minimal water to serve the proposed Project. The impact on available water supplies during normal, dry, and multiple dry years would be less than significant.

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

As discussed in Impact a, the Project may require a marginal increase in wastewater treatment. The Project would not induce the growth of the regional or local population, but would marginally increase the number of employees on-site. Based on the marginal increase of employees it is anticipated that the local wastewater provider would have adequate capacity to serve the Project's projected demand. The impact would be less than significant.

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? (Less than Significant)

Construction of the Project would result in a temporary increase in solid waste disposal needs associated with demolition and construction wastes. Following construction, the proposed Project would be expected to produce additional solid waste. Demolition debris, such as pavement, would be off-hauled for recycling. Materials with no practical potential for reuse would be disposed of at a regional landfill.

Solid waste from the Project site would be delivered to a Transfer Station. Any materials not recycled would be hauled to Sacramento County Landfill (Kiefer) located at 12701 Kiefer Boulevard, Sloughhouse, Sacramento County. The Kiefer Landfill is an active solid waste landfill with an allowable daily capacity of 10,815 tons per day and approximately 112.9 million cubic yards remaining capacity and is permitted to remain in operation through 2064 (CalRecycle 2022). In addition, there are several other active permitted regional landfills in the Project vicinity, including the Forward Landfill in San Joaquin County (24.7 million cubic yards remaining capacity) (CalRecycle 2022).

The solid waste generated during construction and operation of the Project would represent a small fraction of the daily permitted tonnage of these facilities. Solid waste from the Project would not be expected to exceed the capacity of or otherwise adversely affect the Kiefer Landfill. Therefore, the impact related to increased demand for solid waste and landfill space would be less than significant.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? (Less than Significant)

No applicable federal solid waste regulations would apply to the Project. At the State level, the Integrated Waste Management Act mandates a reduction of waste being disposed and establishes an integrated framework for program implementation, solid waste planning, and solid waste facility and landfill compliance. Demolition debris, such as pavement, would be off-hauled for recycling. Materials with no practical potential for reuse would be disposed of at a regional landfill. The State of California requires that large construction and demolition projects reuse or recycle at least 65% of the debris generated. Project construction and demolition activities would be required to comply with applicable solid waste regulations, and solid waste generated on-site would be required to be disposed of in accordance with all applicable federal and state regulations related to solid waste. The impact would be less than significant.

4.20 Wildfire

	Potentially Significant Impact	Less-than-Significant w/ Mitigation Incorporated	Less-than-Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				✓
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				✓
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				✓
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides as a result of runoff, post-fire slop instability, or drainage changes?				✓

The Project site improvements are located in a Local Responsibility Area (LRA), which is an area where a local agency, in this case the City of Rancho Cordova, has primary responsibility for fire and emergency response. California Department of Forestry and Fire Protection mapping (CALFIRE 2022) indicates the entirety of Rancho Cordova is located outside of Very High Fire Hazard Severity Zones (Very High FHSZ).

a) Substantially impair an adopted emergency response plan or emergency evacuation plan? (No Impact)

As stated above, the Project is located within an LRA and is outside of the Very High FHSZ. Therefore, the Project would have no impact.

The following is provided for informational purposes only.

The Project would improve existing facilities within the Bradshaw Terminal and SacRT ROW. No construction of off-site roadways or use of detour routes are anticipated to be needed for the proposed improvements. Construction worker trips and equipment transport would utilize existing roadways during Project construction.

Following construction, the Project would result in a minimal increase in vehicle trips associated with employees and third-party vendors. The number of trips to and from the Project site during Project operation is anticipated to be marginal.

The City of Rancho Cordova does not have emergency evacuation plan emergency response plan. The Sacramento County Evacuation Plan lists Prime Arterial roads as a “primary evacuation route”. Bradshaw Road and Folsom Boulevard are listed on the plan as such (County of Sacramento 2018). No changes

would be made to either road. Therefore, based on the minimal number of trips associated with the construction and operation of the Project, it is not anticipated that the Project would impact emergency response plans or evacuation plans should one need to be implemented.

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? (No Impact)

As stated above, the Project is located within an LRA and is outside of the Very High FHSZ. Therefore, the Project would have no impact.

The following is provided for informational purposes only.

Wildfire risk is dependent upon existing environmental conditions, including but not limited to the amount of vegetation present, topography, and climate. The Project site is located on generally flat land immediately south of Folsom Boulevard. Currently, the undeveloped portions of the Project site consist of grass and small shrubs. The Project would improve the Bradshaw Terminal site and Rail Run-around site. The Project would not house residents or other occupants, nor would the Project increase the area's population.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? (No Impact)

As stated above, the Project is located within an LRA and is outside of the Very High FHSZ. Therefore, the Project would have no impact.

The following is provided for informational purposes only.

The Project would improve the existing emergency access through the Bradshaw Terminal, by increasing the paved vehicle movement and turnaround areas. Maintenance of these new emergency facilities would be similar to existing conditions. Additionally, these components of the Project would improve access to the site for emergency vehicles and provide additional exit routes for users should a wildfire occur.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides as a result of runoff, post-fire slop instability, or drainage changes? (No Impact)

As stated above, the Project is located within an LRA and is outside of the Very High FHSZ. Therefore, the Project would have no impact.

The following is provided for informational purposes only.

The Project would not construct new structures or residences that would create new risks for potential inhabitants. Additionally, the Project site is in a relatively flat area. The relatively flat terrain would make the Project site unlikely to result in landslides. The Project site is not located within a floodplain hazard area that could exacerbate flooding risks if a fire does occur in the immediate vicinity of the site.

4.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less-than-Significant w/ Mitigation Incorporated	Less-than-Significant Impact	No Impact
Does the project:				
a) Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		✓		
b) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?				✓
c) Have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?		✓		

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? (Less than Significant with Mitigation)

Potential Project impacts to biological and cultural resources are addressed in Section 3.4, Biological Resources, Section 3.5, Cultural Resources, and Section 3.18, Tribal Cultural Resources, respectively. With implementation of the recommended mitigation measures identified in this Initial Study, the potential for Project-related activities to degrade the quality of the environment, including wildlife species or their habitat, plant or animal communities, or important examples of California history or prehistory would be reduced to less than significant levels.

Mitigation Measures BIO-1 (Prevent Disturbance to Nesting Birds), CR-1 (Archaeological Inadvertent Discovery Procedures), and CR-2 (Protect Human Remains If Encountered during Construction) would be required for the Project. For a full description of these mitigation measures, please see Sections 4.4, Biological Resources, and 4.5, Cultural Resources.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are

considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)? (Less than Significant)

Cumulative impacts are defined as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts” (CEQA Guidelines Section 15355). Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. This cumulative impact analysis uses the list approach. A search was undertaken to identify other reasonably foreseeable projects that may have overlapping or cumulative impacts with the Project. Efforts to identify cumulative projects included review for ongoing and planned projects within the City of Rancho Cordova and Sacramento County (Planning Projects Viewer). No cumulative projects were identified.

As summarized in Section 4 of this IS/MND, the Project would not result in impacts on agriculture and forestry resources, or wildfire. Therefore, implementation of the Project would not contribute to any related cumulative impact on those resources.

The Project impacts summarized in this Initial Study would not add appreciably to any existing or foreseeable future significant cumulative impact, such as visual quality, cultural resources, biological, traffic impacts, or air quality degradation. The impacts of the proposed Project would be mitigated to a less than significant. Incremental impacts, if any, would be very small, and the cumulative impact would be less than significant.

c) Does the project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly? (Less than Significant with Mitigation)

With implementation of the recommended mitigation measures identified in this Initial Study, the potential for Project-related activities to cause substantial adverse effects on human beings would be reduced to less-than-significant levels.

5. References

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Appendices

Appendix A

Emissions Modeling Output

Appendix B

Biological Technical Studies

Appendix C

Geotechnical Report

Appendix D

Noise Report

Appendix E

VMT and Trip Generation Memorandum