MODIFIED INITIAL STUDY/ STATE CEQA GUIDELINES SECTION 15183 EXEMPTION ANALYSIS WEST COAST OUTLAWS READY-MIX CONCRETE BATCH PLANT

Prepared For:

West Coast Outlaws, Inc.

Prepared By:

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On Behalf of Lead Agency:

City of Sacramento
Community Development Department
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August 2025

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ATTACHMENTS:

A. Air Quality Operational Emission Estimates (Excel workbook pages)
B. Energy Fuel Estimates

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Introduction

This Initial Study provides an analysis of the West Coast Outlaws, Inc.'s (WCO's) Ready-Mix Concrete Batch Plant (proposed Project, or concrete batch plant). The Project is the operation of a ready-mix concrete batch plant on rear four parcels (4.4-acres) along with materials storage, fleet storage and maintenance, block perimeter wall and stormwater retention basin. The site also includes a light industrial building, for an office and shop on a front 0.92 acre parcel.

All analysis methods are supported by California Environmental Quality Act (CEQA) and applicable guidance and reference documents. The analysis in this Initial Study supports a City of Sacramento determination to pursue a CEQA Guidelines Section 15183 exemption streamlining process.. This Initial Study analysis is based on proposed Project details that are measurable, supported by evidence and thus relied upon to prepare estimates of emissions, fuel usage, truck and car activity and utility consumption and generally assess all CEQA Guidelines Appendix G resource areas.

California Environmental Quality Act

This Initial Study has been prepared in accordance with the provisions of the CEQA (California Public Resources Code [PRC] §§ 21000 et seq.); the State CEQA Guidelines (Title 14, California Code of Regulations [CCR] §§ 15000 et seq.); and the rules, regulations, and procedures for implementing CEQA as set forth by the City of Sacramento (City). CEQA Section 21094(a)(1)(2) According to § 21094(a)(1)(2), a subsequent project that is consistent with the following: (1) a program, plan, policy, or ordinance for which an Environmental Impact Report (EIR) was prepared and certified; and, (2) applicable local land use plans and zoning may rely on the analysis contained within the previously certified EIR prepared for the program, plan, policy, or ordinance and need not conduct new or additional analysis for those effects that were either: (1) avoided or mitigated by the certified EIR; or, (2) were sufficiently examined by the certified EIR to enable those effects to be mitigated or avoided by site-specific revisions; the imposition of conditions; or, by other means in connection with approval of the subsequent project.

Under Section 15183 of the State CEQA Guidelines, where a project is consistent with the use and density established for a property under existing zoning, community plan, or general plan policies for which an EIR was certified, additional review is not required "except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site." In approving a project meeting the requirements of this section, a public agency shall limit its examination of environmental effects to those which the agency determines, in an initial study or other analysis:

(1) Are peculiar to the project or the parcel on which the project would be located;
(2) Were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent;
(3) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action; or
(4) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.

As set forth by Sections 15168 and 15183 of the CEQA Guidelines, the program EIR, in this case the City's Sacramento 2040 General Plan Master EIR (Master EIR) (City of Sacramento Environmental Planning, 2024b), serves as a basis for the Modified Initial Study/15183 Checklist to determine if project-specific impacts would occur that are not adequately covered in the previously certified EIR. The information and analysis presented in this document is organized in accordance with City of Sacramento guidance and Appendix G of the CEQA Guidelines.

This Modified Initial Study/15183 Checklist indicates whether the Proposed Project would result in a significant impact that: (1) is peculiar to the project or the Project Site; (2) was not identified as a significant effect in the Master EIR; or (3) are previously identified significant effects, which as a result of substantial new information that was not known at the time that the Master EIR was certified, are determined to have a more severe adverse impact than discussed in the Master EIR.

Regarding "peculiar" impacts, CEQA Guidelines Section 15183(f) states the following:

> An effect of a project on the environment shall not be considered peculiar to the project or the parcel for the purposes of this section if uniformly applied development policies or standards have been previously adopted by the city or county with a finding that the development policies or standards will substantially mitigate that environmental effect when applied to future projects, unless substantial new information shows that the policies or standards will not substantially mitigate the environmental effect. The finding shall be based on substantial evidence which need not include an EIR.

Based on the analysis and evaluation provided in this Modified Initial Study/15183 Checklist, the proposed WCO Ready Mix Batch Plant (proposed Project, or concrete batch plant) is consistent with the development assumptions in the Sacramento 2040 General Plan Master EIR (City of Sacramento, 2024a).. Thus, as described in greater detail below, this Modified Initial Study/15183 Checklist analysis is limited to analyzing whether or not there are significant effects associated with implementation of the proposed WCO Ready Mix Batch Plant Project that are not addressed in the Sacramento 2040 General Plan (City of Sacramento, 2024a), consistent with the provisions of State CEQA Guidelines Section 15183, as described above.

Incorporation By Reference

This Modified Initial Study/15183 Checklist was prepared in accordance with the California Environmental Quality Act (CEQA) (PRC Sections 1500 *et seq.*). The Lead Agency is the City of Sacramento.

On February 27, 2024, the City of Sacramento adopted the 2040 General Plan (City of Sacramento, 2024a). The City of Sacramento also certified a Master EIR associated with the 2040 General Plan (SCH# 2019012048) on February 27, 2024 (City of Sacramento Environmental Planning, 2024b). The General Plan Master EIR was prepared pursuant to Section 15169 of the CEQA Guidelines (Title 14, California Code of Regulations [CCR], Sections 15000 et seq.). The General Plan Master EIR analyzed full implementation of the General Plan and identified measures to mitigate the significant adverse impacts associated with the General Plan to the maximum extent feasible.

As part of the Master EIR process, the City is required to incorporate all feasible mitigation measures or feasible alternatives appropriate to the project as set forth in the Master EIR (SCH# 2019012048) (CEQA Guidelines Section 15177(d)). Policies included in the 2040 General Plan that reduce significant impacts identified in the Master EIR are identified and discussed.. The mitigation monitoring plan for the 2040 General Plan Master EIR, which provides references to applicable General Plan policies that reduce the environmental effects of development that may occur consistent with the General Plan, is included in the adopting resolution for the Master EIR. See City Council Resolution No. 2024-0065, beginning on page 55. This analysis incorporates by reference the general discussion portions of the 2040 General Plan Master EIR (CEQA Guidelines Section 15150(a)).

The Master EIR and City Council resolution are available at: https://www.cityofsacramento.gov/community-development/planning/environmental/impact-reports.

The proposed Project is located within the Fruitridge Broadway Community Plan Area of the 2040 General Plan. **Figure 1** presents the location of the Fruitridge Broadway Community Plan Area.

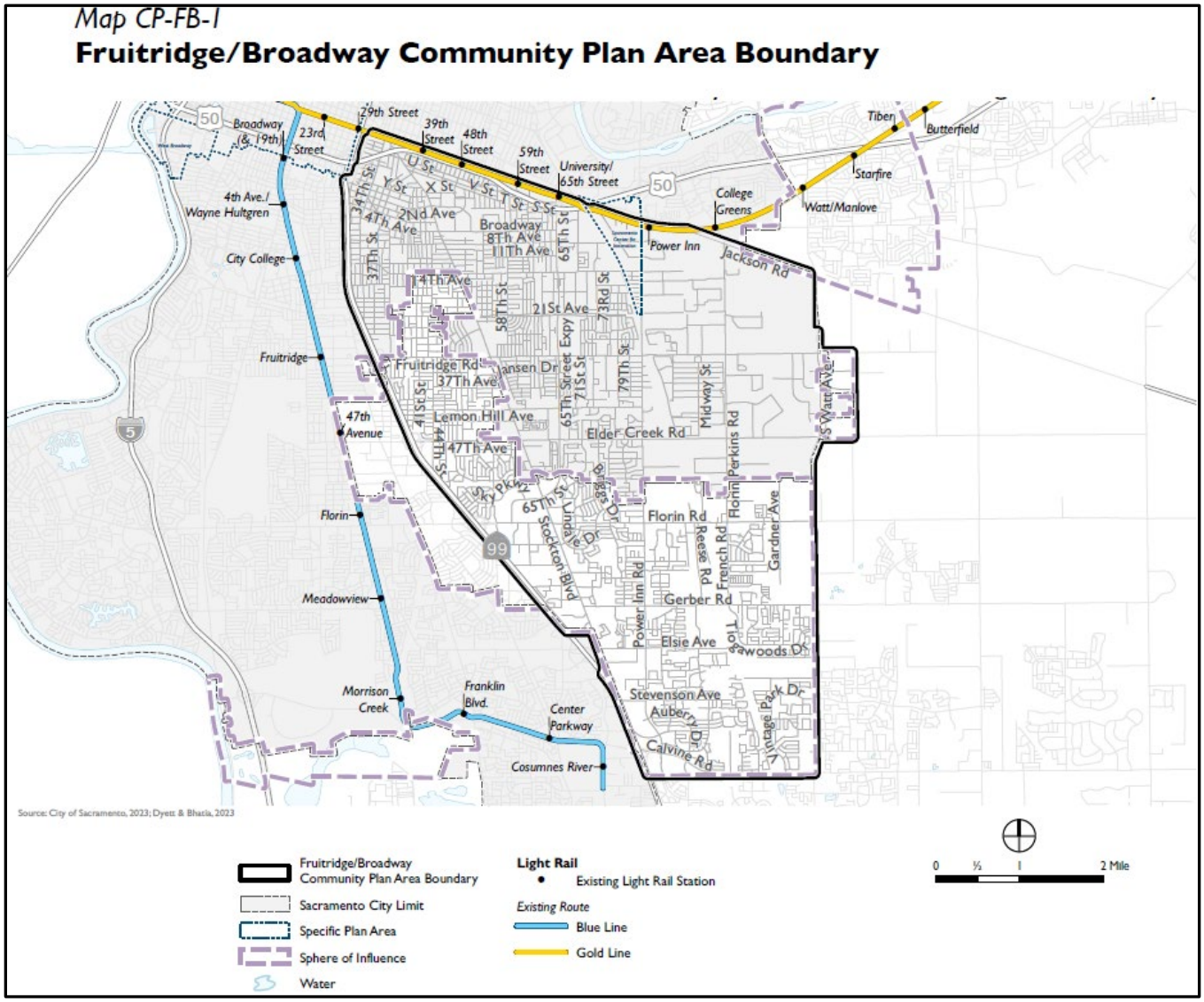


Figure 1 – Fruitridge Broadway Community Plan Area

Modified Initial Study/15183 Checklist Project Description

1. Project title:	West Coast Outlaws Ready-Mix Concrete Batch Plant (proposed Project, or concrete batch plant)
2. Lead agency name and address:	City of Sacramento, Community Development Department, 300 Richards Blvd, 3rd Floor, Sacramento, CA 95811
3. Contact person and phone number:	Marcus Adams, Senior Planner, (916) 808-5044
4. Project location:	8555 Morrison Creek Drive, Sacramento, CA 95828 – Assessor's Parcel Numbers (APNs) 064-0020-067, 064-0110-010, -011, -012 and -013
5. Project sponsor's name and address:	West Coast Outlaws, Inc., Sarah Kelly, 5467 Ballantine St, Ste 4, 4, Sacramento, CA 95826
6. General plan designation:	Industrial Mixed Use (IMU)
7. Zoning:	M-2(S) Zone - Heavy Industrial Zone

8. Description of project (describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or offsite features necessary for its implementation. Attach additional sheets if necessary):

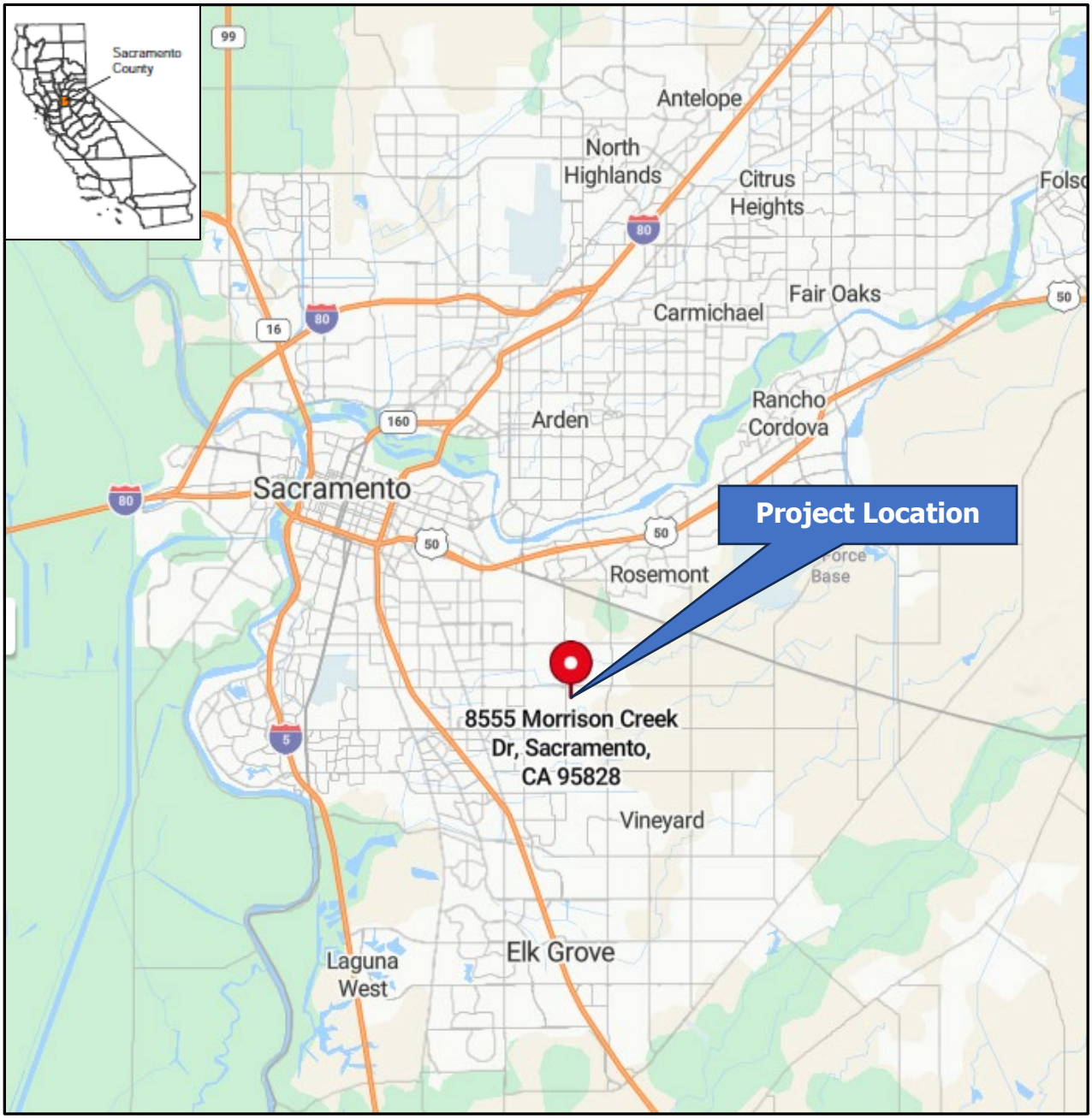
West Coast Outlaws, Inc.'s (WCO's) Ready-Mix Concrete Batch Plant (proposed Project, or concrete batch plant) is a concrete mixing facility that supports WCO's ready-mixed concrete services, which provide concrete products for roads, bridges and other infrastructure in the greater Sacramento region. The Project is the operation of a ready-mix concrete batch plant. Specifically, the site includes a light industrial building, housing an office and shop on 0.92 acres. The rear 4.4-acres is the yard with materials storage, fleet storage and maintenance and the concrete batch plant.

WCO's concrete batch plant is located at 8555 Morrison Creek Drive in the southeast area of the City of Sacramento. WCO's light industrial building is on Assessor's Parcel Numbers (APNs) 064-0020-067, and the concrete batch plant and materials storage is on APNs 064-0110-010, -011, -012 and -013, with a combined total Project site acreage of 5.32 acres. The industrial building was built in 2021; the shop activities are for minor repairs and routine maintenance of facility fleet. The owner purchased the rear four contiguous parcels in 2023. There is no formal address for the rear parcels. The rear yard is accessed via the industrial building site fronting Morrison Creek Drive and includes the concrete batch plant with existing concrete driveways, associated materials storage bins, truck staging area, diesel storage and an existing small office and storage. The Project proposal also includes additional grading (grading plan to be submitted), additional concrete and new asphalt paving for the circulation pathways, new stormwater retention berms and basin, a new block wall along Stayner Court to match the existing block walls and equipment storage areas (proposed lease areas #1, 2 and 3) on the rear four parcels.

The concrete batch plant receives and mixes sand, aggregate (rock, gravel etc.), fly ash, silica fume, slag and cement with onsite well water to formulate concrete. The concrete batch plant has an onsite conveyor, cement silo, aggregate batcher, aggregate bins, batch plant controls and dust collectors. The yard includes materials storage, equipment storage and a dedicated onsite "payload" loader to move materials between storage piles and the concrete batch plant. The site has its own water well in the rear yard along the western wall for use in dust control and related operations.

Figure 2 depicts the proposed Project's regional and site location. **Figure 3** presents a site vicinity map. The site plan is depicted in **Figure 4**. The WCO property is approximately about 1.27 miles to the northeast

of the nearest school (Florin Elementary) and approximately 3,400 feet east of the nearest rail line (Sacramento Regional Transit District's light rail). The nearest residence is about 2,560 feet to the southeast (a rural home surrounded by open space). Other residential communities are 2,750 feet to the south, 7,000 feet to the northeast, and 5,870 feet to the west.



Source: MapQuest, 2025

Figure 2 – Regional Location

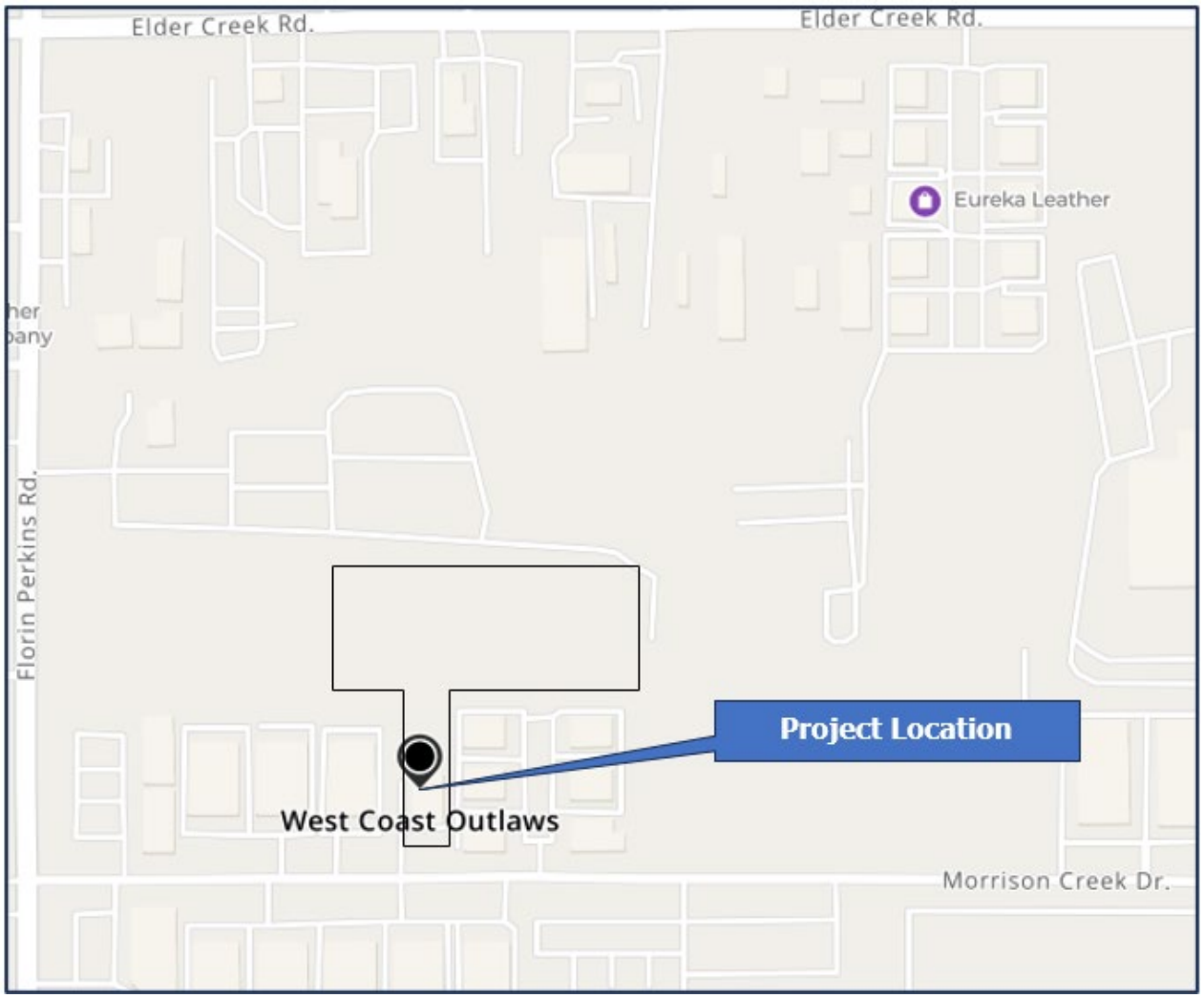


Figure 3 – Vicinity Location

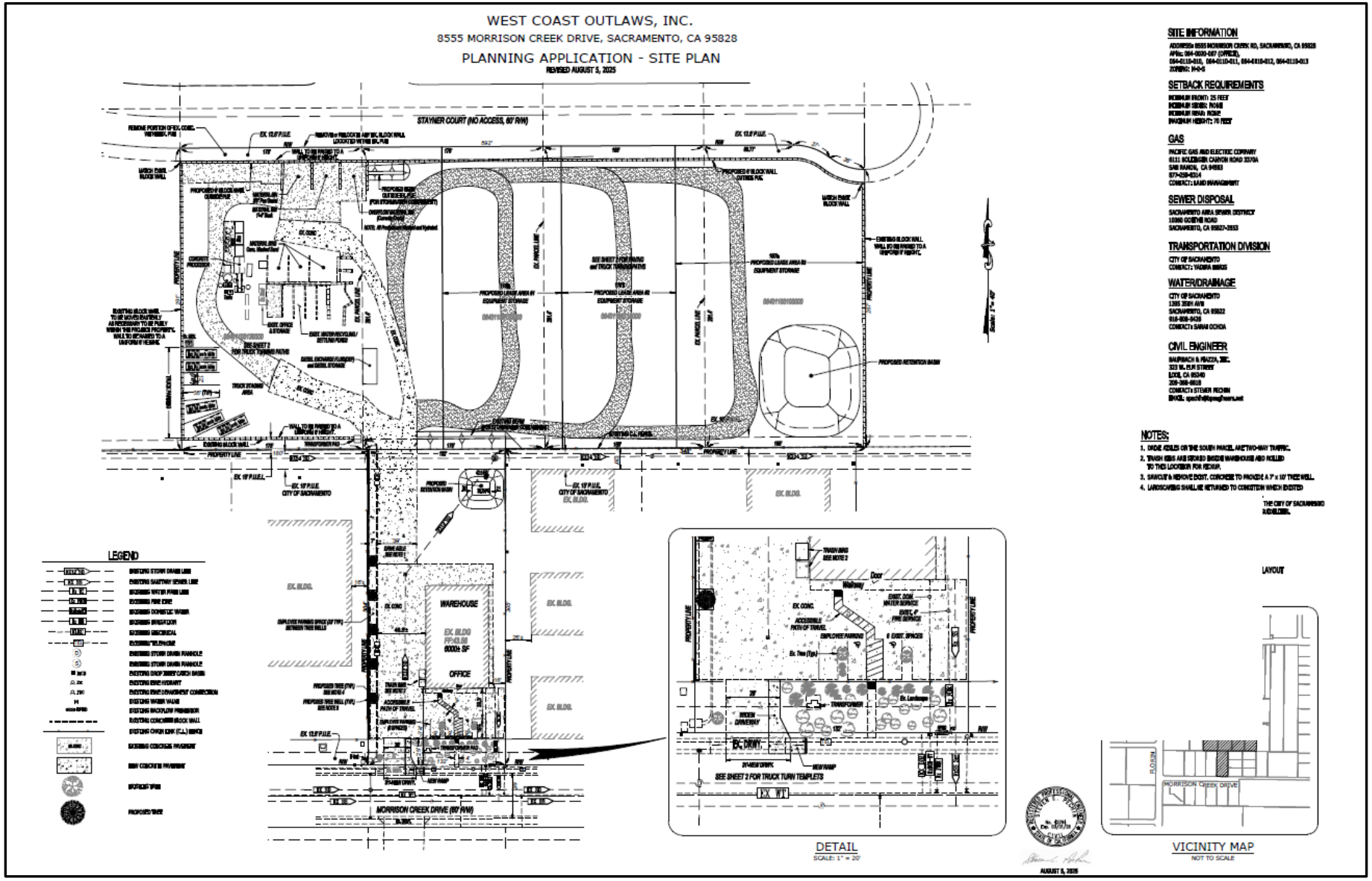


Figure 4 – Project Site Plan

The site receives approximately 20 loads per day from dump trucks delivering raw materials for use onsite; those dump truck loads travel approximately 3.5 round-trip miles per load. The site sends out between 20 to 24 loads per day of mixer trucks with ready-mixed concrete. These mixer truck loads travel between 2 to 50 miles roundtrip per load; for the purpose of being reasonably conservative, a round-trip distance of 35 miles was applied in the air quality, greenhouse gas, and related analyses. These vehicle weights range from 26,000 to 65,000 pounds.

The concrete batch plant operates from 5 a.m. to 10 a.m. during the winter and from 6 a.m. to 1 p.m. during the summer. They use portable LED lights to operate during the early morning hours as needed. The concrete batch plant only uses electricity and WCO has been working with Sacramento Municipal Utility District (SMUD) to extend the electrical utility to the rear four parcels; they anticipate they will use 5,500 kilowatt hours (kWh) per month.

Project access is designed in accordance with all applicable design and safety standards required by adopted fire codes, safety codes, and building codes established by the City's Engineering and Fire Departments. New internal, onsite roads within the proposed Project site are designed and constructed in accordance with local and State building codes and policies.

The proposed Project is eligible as a "no discharge" facility under the California Stormwater Industrial General Permit (IGP) as the site has been engineered to contain the maximum historic precipitation event and is not connected to a municipal storm sewer system. The proposed Project will capture all stormwater onsite using earthen berms, concrete block walls and berms and a retention basin.

The only municipal water usage and wastewater generation would occur from the light industrial building on the front parcel, which has previously been permitted and operating since 2021. The rear four parcels will use the existing onsite water well for dust control, concrete mixing and site maintenance.

WCO has 13 full-time employees and additional four employees during the peak season for a total of 17 employees. Onsite employees man a fire watch tower and maintain defensible space onsite so as not to cause a fire on or offsite.

The concrete batch plant has a RA-5400 bag house, which is described as a reverse air dust collector with 620 square feet of total filtration area. This dust control system is connected to the concrete mixing equipment and is seven feet and four inches high, with a width of 54 inches and a length of 54 inches.

Table 1 summarizes the materials used onsite. All materials will be shipped, handled and stored in accordance with the associated Safety Data Sheet (SDS). The materials in Table 1 are included in the site's Hazardous Materials Business Plan (HMBP) which have been submitted to Sacramento County Environmental Management Department, the local enforcement agency.

Table 1 – Summary of Materials Stored Onsite

Ingredient	Storage Vessel	Vessel Mass	Primary Use
Oil	Sealed drums in a designated area	220 gallons	Equipment lubrication and maintenance
Antifreeze	Tightly sealed containers	55 gallons	Cooling system maintenance
DEF (Diesel Exhaust Fluid)	Properly labeled totes	225 gallons	Emission control for diesel vehicles
Renewable Diesel	Above-ground storage tank	1,750 gallons	Fuel for fleet operations

Ingredient	Storage Vessel	Vessel Mass	Primary Use
Red Dye Diesel	Above-ground storage tank	750 gallons	Fuel for off-road vehicles and equipment
Waste Oil	Sealed waste containers in a secure area	280 gallons	Collection of used oil for disposal/recycling
Euco Shield	Tote in a secure area	275 gallons	Concrete additive
Eucon AEO 2S	Poly tank in a designated area	500 gallons	Concrete additive
Eucon X15	Poly tank in a designated area	1,500 gallons	Concrete additive
Accelguard-NCA	Poly tank in a designated area	1,500 gallons	Concrete additive
PSI Fiberstrand	Boxes in a secured dry storage area	Approx. 55 boxes (25 lbs each)	Concrete additive
Cement	Silos in a secured and designated area	120,000 lbs (2 x 60,000 lb silos)	Concrete manufacturing

Source: WCO, 2025

The purpose of this checklist is to support the Site Plan and Design Review (SPDR) with the City of Sacramento and is to support a CEQA Guidelines 15183 exemption determination. Further, this Modified Initial Study/15183 Checklist evaluates the project as a whole and will support any responsible agency approvals. The site plan in **Figure 4** depicts onsite paving, equipment storage, and onsite stormwater retention.

9. Surrounding land uses and setting (briefly describe the project's surroundings):

The Project site is located entirely within the City of Sacramento's Fruitridge Broadway Community Plan area (see **Figure 2** and **Figure 3**). Specifically, the Project site is located within an area designated as IMU and is located within an M-2(S) zone. The Project is generally surrounded by other similar industrial uses and sites. **Table 2** summarizes the adjacent land uses.

Table 2 – Adjacent Land Uses

Direction	Use
North	IMU – Trucking operations and storage
South	IMU – Automobile repairs, parts and storage
East	IMU – Light Industrial Buildings and storage, vacant land further east
West	IMU – Light Industrial and church

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

This facility is potentially subject to the following compliance programs as part of operations: a Spill Prevention, Control, and Countermeasure (SPCC) Plan, Hazardous Materials Business Plan (HMBP), Stormwater Pollution Prevention Plan (SWPPP), and potentially a National Pollution Discharge Elimination System (NPDES) permit as well as compliance with the Local Enforcement Agency (LEA) Certified Unified

Program Agency (CUPA) requirements. As such, the proposed Project may be required to obtain the following discretionary and ministerial permits and approvals from the following agencies:

1. City of Sacramento land use reviews, SPDR, building permits
2. Sacramento Metropolitan Air Quality Management District (SMAQMD) compliance with air rules and regulatory requirements
3. Sacramento County Environmental Management Department, CUPA LEA – HMBP, SPCC
4. Central Valley Regional Water Board, Rancho Cordova Branch – Notice of Non Applicability (NONA) NPDES permit, SWPPP (potential) and other ministerial actions
5. SMUD – electricity service

11. Have California Native American Tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code (PRC) § 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?:

On December 12, 2024 notifications, pursuant to the requirements of PRC § 21080.3.1, were sent out to the tribes that are traditionally and culturally affiliated with the area that previously requested to receive such notification. One tribe responded with an email declining consultation on December 20, 2024. No other tribe requested consultation within 30 days of notification. The site is previously graded, graveled and developed and therefore no impacts to tribal/cultural resources are anticipated, as documented in this Modified Initial Study/ 15183 Checklist.

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	☐ Agriculture and Forestry Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology / Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials
☐ Hydrology / Water Quality	☐ Land Use / Planning	☐ Mineral Resources
☐ Noise	☐ Population / Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Tribal Cultural Resources
☐ Utilities / Public Systems	☐ Wildfire	☐ 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 will be prepared.

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

☐ I find that although the proposed project could have a significant effect on the environment, there will 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 will be prepared.

☐ I find that the proposed project 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 although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have 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.

☒ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have 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.

Scott Johnson
Signature

August 13, 2025
Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. CEQA Guidelines Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used. Identify and state where they are available for review.

   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

   a) the significance criteria or threshold, if any, used to evaluate each question; and

   b) the mitigation measure identified, if any, to reduce the impact to less than significance

Issues:

Section I. Aesthetics

I. AESTHETICS Except as provided in Public Resources Code Section 21099, would the project:	**Significant Impact Peculiar to the Project or the Project Site**	**Significant Impact Due to New Information**	**Impact Adequately Addressed in the Master EIR**	**No Impact**
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

The significance criteria used to evaluate the project impacts to aesthetics are based on Appendix G of the CEQA Guidelines, thresholds of significance adopted by the City in applicable general plans and previous environmental documents, and professional judgment.

The Master EIR described the existing visual conditions in the City of Sacramento, and the potential changes to those conditions that could result from development consistent with the 2040 General Plan. See Master EIR, Section 4.1, Aesthetics. The Master EIR identified potential impacts for light and glare (Impact 4.1-1) and concluded that impacts would be less than significant.

Policies in the 2040 General Plan Land Use and Placemaking Element encourage visually appealing and engaging development and were identified as mitigating potential effects of development that could occur under the 2040 General Plan. For example, Policy LUP-4.6 requires lighting to be shielded from view and directed downward to minimize impacts on adjacent residential uses and Policy LUP-4.7 calls for the City to use development standards and design standards/guidelines to promote development patterns and streetscape improvements that transform the visual and physical character of automobile-oriented corridors to create a positive impact on the human and natural systems that interact with them. Policy LUP-8.10 requires appropriate building and site design that considers and reflects the existing character of neighborhoods and corridors such as through the use of compatible building materials.

a) **No Impact:** The Project site is not located near a known scenic vista (City of Sacramento, 2024). There are no identified scenic vistas and/or resources identified within the Fruitridge Broadway Community Plan of the City of Sacramento's 2040 General Plan (herein after "the Fruitridge Broadway Community Plan") (City of Sacramento, 2024). Therefore, the Project site would result in no impact to scenic vistas. Based

on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review.

b) **No Impact:** There are no identified scenic vistas or resources within the Project vicinity and the general Southern Sacramento area as identified in the *Fruitridge Broadway Community Plan* (City of Sacramento, 2024) which is part of the City of Sacramento 2040 General Plan (City of Sacramento, 2024a) and Master EIR (City of Sacramento Environmental Planning, 2024b). Additionally, according to the California Department of Transportation (Caltrans) California State Scenic Highway System Map, the nearest State Scenic Highway is State Route 160 (SR-160), which is approximately 6.8 miles southwest of the Project site (California Department of Transportation (Caltrans), 2019). Additionally, the Project operations would be within the parcels of the property as described in the Project Description above. Therefore, due to the distance from the nearest Static Scenic Highway, the Project would not damage scenic resources, including trees, rock outcroppings, and historic buildings within a state scenic highway. As such, no impact would occur. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review.

c) **No Impact:** The Project would not degrade the existing visual character or quality of public views of the Project site and its surroundings. As described in the Project Description above, the Project site is located entirely within the City's M-2(S) zone and IMU land designation. Much of the Project site is also visually screened by existing buildings and industrial uses surrounding the site. Additionally, the Project operations would be entirely within the property boundary of the Project parcels, and therefore, the Project would continue to be consistent with the existing industrial visual characters of the area. For these reasons, there would be no impact to public views as a result of the Project. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review.

d) **Impact Adequately Addressed in the Master EIR:** The proposed Project would not create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area. The Project would operate for 5 to 8 hours a day, during the morning; as such, the Project would not require lighting at night. Therefore, the Project would not produce substantial light or glare outdoors. Any additional outdoor lighting would be installed in accordance with local, state, and federal regulations and would minimize any substantial light and glare whenever possible. Therefore, a less than significant impact would occur. Based on the above, the proposed Project impacts related to creating new sources of light and glare were adequately addressed in the Master EIR and the proposed Project would not result in any peculiar effects that would require further CEQA review.

Findings

The proposed Project would not have any significant effects relating to aesthetics that either have not already been analyzed in the Master EIR or that are more significant than previously analyzed.

Section II. Agriculture and Forestry Resources

II. AGRICULTURE AND FORESTRY RESOURCES In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	**Significant Impact Peculiar to the Project or the Project Site**	**Significant Impact Due to New Information**	**Impact Adequately Addressed in the Master EIR**	**No Impact**
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?	☐	☐	☐	☒

The Master EIR discussed the potential impact of development under the 2040 General Plan on agricultural resources (see Master EIR, Chapter 4.2). Although lands adjacent to the City are among the most productive agricultural regions in California, the Master EIR concluded that the impact of the General Plan on agricultural resources within the City was less than significant.

a) **No Impact:** The proposed Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. According to mapping information available through the California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP), the

Project site is comprised of "Urban and Built-Up Land" and is not located within any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (California Department of Conservation (DOC), 2022). For these reasons, the Project would have no impact on this resource area. Based on the above, impacts related to agricultural resources were adequately addressed in the Master EIR and the proposed Project would not result in any peculiar effects that would require further CEQA review.

b) **No Impact:** The Project site is located entirely within the existing property zoned industrial and is not in the vicinity of any farmland or agricultural land use (DOC, 2022). Additionally, according to the Sacramento County GIS – Williamson Act Parcels, the Project site is not subject to the Willamson Act nor zoned for agricultural use (Sacramento County, 2024). As defined above in the Project Description, the Project site is located within an area designated as IMU in the City General Plan; the IMU designation provides for employment-generating uses such as manufacturing that may produce loud noise or odors and tend to have a high volume of truck traffic, and the M-2(S) ("Heavy Industrial Landscape Setback") zoning designation (City of Sacramento, 2024); (City of Sacramento Department of Planning & Development, 1995)). Therefore, the Project would not conflict with or require changes to the City's existing General Plan or Zoning designations. For these reasons, the Project would not conflict with any Williamson Act contracts or existing zoning for agricultural uses, and therefore, there would be no impact. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review.

c) **No Impact:** The Project site is located within the IMU General Plan designation and M-2(S) zoning designation (City of Sacramento, 2024). Because the Project parcels are zoned as M-2(S), the Project site is not zoned as forest land, or timberland zoned Timberland Production by either the City, the County, or the State, nor is it surrounded by lands zoned as forest land or timberland zoned Timberland Production. For these reasons, the Project would have no impact on existing zoning for or cause rezoning of forest land, timberland, or timberland-zoned Timberland Production. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review.

d) **No Impact:** The proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use, as there are no forest lands on the Project site. Specifically, the Project is the operation of a concrete batch plant located entirely within the parcels as described in the Project Description. Additionally, the Project parcels are designated as IMU and there is no evidence of forest land onsite. For these reasons, no impacts to forest lands would occur. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review.

e) **No Impact:** The Project site is designated as IMU by the City General Plan and is zoned M-2(S) for heavy industrial landscape setback. Since the Project would occur entirely within the existing disturbed boundaries of parcels designated as IMU, there would be no conversion or loss of farmland or forestland. Therefore, no impact would occur. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review.

Findings

The proposed Project would not have any significant effects relating to agriculture and forestry that either have not already been analyzed in the Master EIR or that are more significant than previously analyzed.

Section III. Air Quality

III. AIR QUALITY Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:	**Significant Impact Peculiar to the Project or the Project Site**	**Significant Impact Due to New Information**	**Impact Adequately Addressed in the Master EIR**	**No Impact**
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
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 City of Sacramento is located within the Sacramento Valley Air Basin (SVAB), which is a valley bounded by the North Coast Mountain Ranges to the west and the Northern Sierra Nevada Mountains to the east. The terrain in the valley is flat, with an elevation of approximately 25 feet above sea level.

Air pollution within the SVAB is generated by stationary, area, and mobile sources. Stationary sources are typically industrial or manufacturing facilities. Area sources include emissions from landscaping equipment, consumer products, heating fuels, and architectural coatings. Mobile sources encompass emissions from motor vehicles, including tailpipe, evaporative, and brake and tire wear particles, from both on-road vehicles like cars and trucks and off-road equipment.

Concentrations of emissions from criteria air pollutants (the most prevalent air pollutants known to be harmful to human health) are used to indicate the quality of the ambient air. Criteria air pollutants include ozone, carbon monoxide (CO), nitrogen dioxide (NO2), sulfur dioxide (SO2), respirable and fine particulate matter (PM10 and PM2.5), and lead.

According to the Master EIR, construction and operation of future development under the 2040 General Plan would result in emissions of criteria air pollutants from mobile, area, energy and/or stationary sources. The Master EIR relies on project-level thresholds of significance to determine if individual developments, such as the proposed Project, would result in significant impacts to air quality. The proposed Project would generate emissions during operations. The site is already developed and any remaining construction activities (remaining grading (if any), stormwater retention basin and finish block wall in select areas) would be limited in scope and schedule; for these reasons these construction emissions were anticipated to be well below construction thresholds and therefore met screening thresholds for not requiring further analysis. The significance of potential impacts from construction and operational activities are evaluated separately. A project would be determined to have a significant impact on air quality if the emissions sum for any criteria pollutant exceeds its respective threshold of significance promulgated by the SMAQMD. **Table 3** summarizes

SMAQMD's Thresholds of Significance for Criteria Pollutants of Concern applicable to the Project (Sacramento Metropolitan Air Quality Management District (SMAQMD), 2020) for construction and operations emissions in pounds per day (ppd) and tons per year (tpy).

Table 3 – SMAQMD's Operational Thresholds of Significance for Criteria Pollutants

Pollutant	Construction Threshold	Operational Threshold
ROG	None	65 ppd
NOx	85 ppd	65 ppd
PM10	80 ppd[1]	80 ppd[1]
PM2.5	82 ppd[1]	82 ppd[1]

Source: (Sacramento Metropolitan Air Quality Management District (SMAQMD), 2020)
Note: 1) PM10's applicable threshold is 80 ppd and PM2.5's applicable threshold is 82 ppd if all BACT and BMPs are applied. The site travel path is paved, there is a bag house on the ready-mix cement mixer and the facility is operating under an air permit.

The Master EIR evaluated the effects of implementation of the 2040 General Plan and Climate Action & Adaptation Plan (CAAP) on air quality in the Planning Area, and the potential for exposure of sensitive individuals to unhealthy pollutant concentrations. See Master EIR, Section 4.3, Air Quality.

The Master EIR identified potential impacts to air quality (Impacts 4.3-1 through 4.3-5) and concluded that impacts would be less than significant with the implementation of applicable regulations and General Plan policies.

The 2040 General Plan Environmental Resources and Constraints (ERC) Element outlines collaborative actions to reduce air pollution and includes policies identified as mitigating the potential effects of development that could occur under the 2040 General Plan. Specifically, Policy ERC-4.3 (Project Design) encourages the use of new technologies, materials, and design techniques in private development to reduce air pollution, noise, excess heat, and other environmental impacts; Policy ERC-4.4 (Sensitive Uses) directs the City to consult with SMAQMD to assess exposure of sensitive receptors to TACs; and Policy ERC-4.5 (Construction Emissions) requires that construction and grading activities implement measures and best practices recommended by SMAQMD to minimize short-term air quality impacts.

As described above in the Project Description summary, the proposed Project is the operation of a ready-mix concrete batch plant. There will be movement and mixing of the facility materials (summarized in **Table 1**) and the transport of the ready-mix concrete to the job sites in the area. As described above in the Project Description, the site receives approximately 20 loads per day from dump trucks delivering raw materials for use onsite; those dump truck loads travel 3.5 round-trip miles per load. The site sends out between 20 to 24 loads per day of mixer trucks with ready-mixed concrete. These mixer truck loads travel between 2 to 50 miles roundtrip per load; for the purpose of being reasonably conservative, a round-trip distance of 35 miles was applied in the air quality, greenhouse gas, and related analyses.

Operations emissions would be from mobile, and process emissions. These emissions were based on operational data provided by WCO's concrete batch plant, emission factors from the *Emission Factor estimator model* (EMFAC), AP-42, and manufacturing specifications for stationary source equipment ((California Air Pollution Control Officers Association (CAPCOA), 2022); (U.S. Environmental Protection Agency (EPA), 2024)). **Attachment A** includes detailed operational emission calculations.

Table 4 presents a summary of the estimated operational emissions based on the assumptions as summarized above and within **Attachment A**. All operational emissions would be well below SMAQMD thresholds of significance for annual and daily scenarios.

Table 4 – Project Operations Emissions

Category	VOC	NOx	CO	SOx	PM10	PM2.5
Annual Emissions (tpy)						
Mobile	0.012	0.342	0.148	0.005	0.011	0.010
Process					1.140	1.140
With Grid	**0.012**	**0.342**	**0.148**	**0.005**	**1.151**	**1.15**
SMAQMD Threshold (tpy)	**NA**	**NA**	**NA**	**NA**	**14.6**	**15.0**
EXCEEDS THRESHOLDS?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**
Daily Emissions (ppd)						
Mobile	0.071	2.300	0.835	0.032	0.065	0.062
Process					6.628	6.628
With Grid	**0.071**	**2.300**	**0.835**	**0.032**	**6.693**	**6.69**
SMAQMD Threshold (ppd)	**65**	**65**	**N/A**	**N/A**	**80**	**82**
EXCEEDS THRESHOLDS?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: WCO and Trinity Consultants, 2025
tpy = tons per year
ppd = pounds per day

a) Impact Adequately Addressed in the Master EIR: State CEQA Guidelines and the federal Clean Air Act (Sections 176 and 316) contain specific references on the need to evaluate consistencies between the proposed Project and the applicable air quality attainment plans (AQAP) for the proposed Project site. To accomplish this, California Air Resources Board (CARB) has developed a three-step approach to determine Project conformity with the applicable AQAP:

1. Determination that an AQAP is being implemented in the area where the Project is being proposed. The SMAQMD has implemented the current, modified State Implementation Plan (SIP) as approved by CARB.
2. The proposed Project must be consistent with the growth assumptions of the applicable AQAP/SIP. The proposed Project land use type would conform to the existing land use of the Project site. The site is in an existing industrial area and the proposed Project is a discretionary allowed use within an M-2(S) zone. Therefore, the proposed Project is consistent with the growth assumptions in the City of Sacramento 2040 General Plan Master EIR.
3. The Project must contain all reasonably available and feasible air quality control measures in its design. The proposed Project incorporates various policy and rule-required design features that will reduce related emissions.

The California Clean Air Act (CCAA) and AQAP identify transportation control measures as methods to further reduce emissions from mobile sources. Strategies identified to reduce vehicular emissions, such as reductions in vehicle trips, vehicle use, vehicle miles traveled (VMT), vehicle idling, and traffic congestion, can be implemented as control measures under the CCAA in order to reduce vehicular emissions as well. This proposed Project, specifically, would receive materials from nearby sources and service projects in the immediate area to limit VMT.

Operations represented by the proposed Project, and any future growth that may or may not result, is already included in the City of Sacramento General Plan Master EIR (City of Sacramento, 2024a)and the AQAP, conclusions may be drawn from the following criteria:

1. That, by definition, the anticipated emissions from the proposed Project are below the SMAQMD's established emission impact thresholds.
2. That the primary source of emissions from the proposed Project will be from the ready-mix operations and mobile sources whose emissions are already incorporated into CARB's Emissions Inventory for the air basin (City of Sacramento, 2024).

Based on these factors, the proposed Project is *consistent with the AQAP/SIP* and would therefore have no new impacts relating to potential conflicts with or obstruction of the applicable air quality plan. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and proposed Project impacts were adequately addressed in the Master EIR.

b) Impact Adequately Addressed in the Master EIR: Air pollution emissions associated with the proposed Project would occur over both short and long-term time periods. The concrete batch plant is already in place, so this analysis looked at long-term operational emissions. Long-term emissions generated by Project operation would include criteria pollutant emissions and is summarized above in **Table 4**; all emissions would be below SMAQMD thresholds with application of all BACT and BMPs for the operational scenario. **Table 4** above summarizes the annual operations emissions; all emissions would be below SMAQMD thresholds for the operational scenario.

As shown in **Table 4** above, the proposed Project's estimated operational emissions are well below established SMAQMD thresholds. For these reasons, the proposed Project's potential impacts would not be cumulatively considerable, and the proposed Project's potential cumulative effects would generate no new impacts. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and proposed Project impacts were adequately addressed in the Master EIR.

c) Impact Adequately Addressed in the Master EIR: As described in the Project Description, the Project is proposed to be operated with an existing IMU area. The nearest school is approximately 1.2 miles southwest of the proposed Project site. The nearest residence is about 2,560 feet to the southeast of the proposed Project.

The proposed Project uses materials to produce cement, involving a process that includes dust collection and dust suppression. This process is not expected to generate nuisance odors or dust given: 1) the nearest potential sensitive receptors are more than 2,000 feet to the southeast and further in other directions; 2) the proposed Project is within an existing IMU; and 3) the concrete batch plant includes dust control. For these reasons, the Project would have no adverse impacts on potentially sensitive receptors from the proposed Project and there would be no new impact. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

d) Impact Adequately Addressed in the Master EIR: The proposed Project emissions, presented in **Table 4**, would be substantially below SMAQMD CEQA thresholds. Further, the proposed Project is located within an existing M-2(S) zone, which is an IMU general plan designation and set back more than 2,500 feet from the nearest residence. For these reasons, the proposed Project would not result in other emissions (such as those leading to odors) that would adversely affect a substantial number of people and would, therefore, there would be no new impact. Based on the above, the proposed Project would

not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

Findings

The proposed Project would not have any significant effects relating to air quality that either have not already been analyzed in the Master EIR or that are more significant than previously analyzed.

Section IV. Biological Resources

IV. BIOLOGICAL RESOURCES Would the project:	**Significant Impact Peculiar to the Project or the Project Site**	**Significant Impact Due to New Information**	**Impact Adequately Addressed in the Master EIR**	**No Impact**
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?	☐	☐	☐	☒

The Master EIR discussed the potential impact of development under the 2040 General Plan on biological resources (see Master EIR, Chapter 4.4). There are no goals pertaining to biological resources that are specific to the Fruitridge / Broadway Community Plan Area, the plan area of the Project Site. The Master EIR concluded that the 2040 General Plan has less-than-significant impacts on all special-status species and sensitive habitats.

a) **No Impact:** The Project would not have a substantial adverse effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS). The Project would operate the WCO concrete batch plant within a 4.4-acre portion of the existing 5.32-acre WCO property, which has had existing mixed-use industrial activities since at least 2021. Additionally, the site is designated IMU and is immediately surrounded by other industrial uses; therefore, it has little to no value as a wildlife habitat. Because of the facility's historic

industrial operations and the highly disturbed nature of the project site and surrounding area, the Project would not adversely affect candidate, sensitive, or special status species, and there would be no impact on candidate, sensitive, or special status species. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review.

b) **Impact Adequately Addressed in the Master EIR:** According to the CDFW National Wetland Inventory interactive mapping service, there are no riparian or sensitive natural communities within the Project site or the surrounding area, but a riparian corridor passes through the northwestern portion of the WCO property (California Department of Fish and Wildlife (CDFW), 2023). However, previous historic activities have disturbed the project site prior to WCO's acquisition of the site parcels. It is devoid of any vegetation and/or bodies of water that would serve as a riparian habitat. Additionally, the site is immediately surrounded by other highly developed industrial operations devoid of riparian habitats. For these reasons, the Project site and surrounding areas possess little potential for riparian habitat/migration to occur. Therefore, the Project would not substantially affect any riparian habitat or other sensitive natural community, and there would be no new impact. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review.

c) **No Impact:** According to the CDFW National Wetland Inventory interactive mapping service, there are no wetlands located within the Project site (California Department of Fish and Wildlife (CDFW), 2023). Specifically, the nearest wetland is a 0.54-acre Freshwater Emergency Wetland (ID No. PEM1C) located approximately 0.3 miles east of the site. However, the Project would not expand beyond the existing 5.32-acre WCO property. Therefore, the Project would not substantially affect state or federally protected wetlands, and there would be no impact. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review.

d) **Impact Adequately Addressed in the Master EIR:** The proposed Project area was previously disturbed and graded prior to WCO's acquisition of the site parcels and is surrounded by other existing industrial operations. The Project site is located in an area identified by the CDFW Habitat Connectivity Viewer as having "limited connectivity opportunity," meaning it provides minimal support for wildlife movement (CDFW, 2023). Additionally, the Project site has been historically disturbed and is cleared of native vegetation. As such, the Project site has little to no value for fish and wildlife species or as a migratory corridor. Similarly, while a riparian corridor passes through the northwestern portion of the site, the site and surrounding areas are devoid of native vegetation due to historic industrial uses in the area that have occurred since at least 2021. Therefore, the Project site poses little potential for riparian passage. Since the site and surrounding areas have been devoid of native habitat for an extended period, and there are no other known wildlife corridors or native nursery sites onsite, the Project would continue to not interfere with the movement of any resident or migratory fish and wildlife species, migratory corridors, or native wildlife nursery sites. For these reasons, no new impact would occur. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review.

e) **No Impact:** The proposed Project is an existing industrial development with the City's General Plan IMU designation and M-2(S) zoning designation (City of Sacramento, 2024). Given that the site is already cleared, the Project would not conflict with local policies or ordinances that protect biological resources, such as a tree preservation policy or ordinances. The Project would also not conflict with or require changes to the City's existing General Plan or Zoning designations. The Project site is devoid of native vegetation, and no special status trees or other plant species inhabit the site. As such, the Project would not affect trees or other biological resources that are protected by the City, state, or federal agencies. For these reasons, no impacts would occur as a result of this Project. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review.

f) **No Impact:** Neither the City nor the County implement any conservation plans within the Project area. For these reasons, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. As such, there would be no impact. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review.

Findings

The proposed Project would not have any significant effects relating to biological resources that either have not already been analyzed in the Master EIR or that are more significant than previously analyzed.

Section V. Cultural Resources

V. CULTURAL RESOURCES Would the project:	**Significant Impact Peculiar to the Project or the Project Site**	**Significant Impact Due to New Information**	**Impact Adequately Addressed in the Master EIR**	**No Impact**
a) Cause a substantial adverse change in the significance of a historical resource pursuant to in § 15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☐	☒	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

For purposes of this Modified Initial Study/15183 Checklist, Cultural Resources impacts may be considered significant if construction and/or implementation of the proposed Project would result in the following impacts that remain significant after implementation of 2040 General Plan policies:

- Cause a substantial change in the significance of an historical or archaeological resource as defined in CEQA Guidelines Section 15064.5.
- Directly or indirectly destroy a unique paleontological resource.
- Disturb any human remains.

All projects must comply with state and federal guidelines, including Public Resources Code §5097.5 and Section 7050.5 of the California Health and Safety Code, when conducting ground-disturbing activities. However, since the proposed Project involves minor ground disturbance of the existing WCO property, the discovery of archaeological or historic resources or human remains is not anticipated.

The Master EIR evaluated the potential effects of development under the 2040 General Plan on prehistoric and historic resources (See Master EIR Chapter 4.5). The 2040 General Plan includes 26 policies designed to preserve historic and cultural resources by encouraging the City to actively identify, protect, and maintain these assets. 2040 General Plan policies relevant to Cultural Resources and the Proposed Project include:

- HCR-1.1 Preservation of Historic and Cultural Resources Site Features and Landscaping. The City shall continue to promote the preservation, restoration, enhancement, and recognition of historic and cultural resources throughout the city.

- HCR-1.14 Archaeological, Tribal, and Cultural Resources. The City shall continue to comply with federal and State regulations and best practices aimed at protecting and mitigating impacts to archaeological resources and the broader range of cultural resources as well as tribal cultural resources.

- HCR-1.15 Treatment of Native American Human Remains. The City shall treat Native American human remains with sensitivity and dignity and ensure compliance with the associated provisions of California Health

and Safety Code and the California Public Resources Code. The City shall collaborate with the most likely descendants identified by the Native American Heritage Commission.

- HCR-1.17 Evaluation of Archaeological Resources. The City shall work in good faith with interested communities to evaluate proposed development sites for the presence of sub-surface historic, archaeological, and tribal cultural resources that may be present at the site.

- HCR-1.18 Evaluation of Potentially Eligible Built Environment Resources. The City shall continue to evaluate all buildings and structures 50 years old and older for potential historic significance prior to approving a project that would demolish or significantly alter the resource.

The Master EIR concluded that implementation of the 2040 General Plan would have a significant and unavoidable effect on historic resources and archeological resources (Impacts 4.5-1,2,3).

a) No Impact: The Project would not cause a substantial adverse change in the significance of historical resources pursuant to § 15064.5. There are no historic resources within the immediate vicinity of the Project site, according to *Map HCR-1: Historic Districts and Landmark Parcels* of the Cultural Resources Element of the City of Sacramento's General Plan (City of Sacramento, 2024). Specifically, the nearest landmark parcel is approximately 4.5 miles northwest of the site along Broadway Avenue. Additionally, the Project site is designated as IMU and is surrounded by other industrial uses. Therefore, due to the considerable distance from the nearest historic resource and since the Project is located within an existing developed industrial area, the Project is not anticipated to cause substantial adverse changes to historic resources. For these reasons, no impact would occur. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

b) Impact Adequately Addressed in the Master EIR: The Project would not cause a substantial adverse change in the significance of archaeological resources pursuant to § 15064.5. The Project would be located within a 5.32-acre existing graded area of the WCO's concrete ready-mix facility. No mining activities would occur onsite as all aggregate materials will be extracted offsite and shipped to the Project site for processing. Additionally, only minor grading work would occur as part of this Project, including possibly internal driveways and stormwater containment infrastructure, such as earthen berms, concrete block walls, and a retention basin. As such, the Project would not cause a substantial adverse change to archeological resources since the site was previously graded and disturbed prior to WCO's acquisition of the site parcels. For these reasons, no new impact would occur. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

c) Impact Adequately Addressed in the Master EIR: The Project would not disturb any human remains, including those interred outside of dedicated cemeteries. The Project site, a ready-mix concrete operation, is located entirely within an existing developed industrial area. No known human remains have been discovered onsite. Additionally, only minimal grading work would occur to construct stormwater containment infrastructure along the outer boundary of the property. No other earth-disturbing activities would occur onsite. However, as with any project, in the unlikely event that human remains are discovered during operations, work in the immediate vicinity will cease, and the County Coroner would be contacted pursuant to State Health and Safety Code §7050.5. For these reasons, there would be no new impacts to undiscovered human remains, with no mitigation required. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

Findings

The proposed Project would not have any significant effects relating to cultural resources that either have not already been analyzed in the Master EIR or that are more significant than previously analyzed.

Section VI. Energy

VI. ENERGY Would the project:	**Significant Impact Peculiar to the Project or the Project Site**	**Significant Impact Due to New Information**	**Impact Adequately Addressed in the Master EIR**	**No Impact**
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

The Project Site is located within the service area of SMUD for electrical services and Pacific Gas and Electric Company (PG&E) for natural gas services. SMUD supplies electricity across a 900-square-mile service territory to 1.5 million users with a total annual retail load of approximately 12.565 million megawatt-hours, covering most of Sacramento County and a portion of Placer County. PG&E provides natural gas service to most of northern and central California.

For the purposes of this Modified Initial Study/15183 Checklist, an impact is considered significant if the Proposed Project would:

- Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.
- Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

The Master EIR Chapter 4.6 evaluated the effects associated with the implementation of future growth envisioned in the 2040 General Plan as it relates to energy consumption and energy efficiency plans and policies. Provisions of the 2040 General Plan that provide substantial guidance regarding energy consumption include the Land Use and Placemaking Element, Environmental Resources and Constraints Element, and Mobility Element. Specific General Plan policies that would reduce energy consumption during construction include ERC-4.5 (Construction Emissions), which requires that construction and grading activities minimize air quality impacts by implementing appropriate measures and best practices established by SMAQMD. Policies that would prioritize energy efficiency during operation include ERC-9.4 (Carbon Neutral Building), which focuses on transitioning fossil fuel-powered buildings to electric power by 2045, and Policy ERC-8.1 (Cooling Design Techniques), which promotes energy-efficient cooling techniques in new developments to reduce energy demand and heat island effects, in alignment with CALGreen.

Under Impacts 4.6-1 and 4.6-2, the Master EIR determined that buildout of the General Plan would result in a less-than-significant impact regarding wasteful, inefficient, or unnecessary consumption of energy resources, and would not conflict with or obstruct alignment with state or local plans for renewable energy or energy efficiency.

The proposed Project would consume electricity and fuel during operations.

The facility will be connected to the grid and would receive electricity from SMUD. At a monthly rate of 5,500 kWh, the proposed Project would consume up to 66,000 kWh annually for the annual average operations schedule of 6.5 hours a day, six days per week. Long term operations would consume up to 77,325 gallons of diesel fuel per year for truck deliveries and up to 5,589 gallons of gasoline fuel per year for passenger vehicles. **Attachment B** includes summary tables of these fuel usage estimates.

a) Impact Adequately Addressed in the Master EIR: The purpose of the proposed Project is to mix concrete for use in regional developments, including roads, bridges, and other infrastructure. In order to produce concrete, there would be electricity and fuel consumed (as summarized above). The Project would use locally sourced materials and serve local projects. As such, the resulting annual fuel usage and electricity consumption estimates are relatively low for a manufacturing operation of this nature, and there would be no wasteful, inefficient or unnecessary consumption of energy. For these reasons, the Project would have no new impact on energy consumption during construction and operation. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

b) Impact Adequately Addressed in the Master EIR: The proposed Project will be required to connect to SMUD to supply power to the site. Further, the facility operations would include the use of renewable diesel to operate equipment onsite. The proposed Project would operate in an IMU area which would not be used for future renewable energy developments. This proposed Project would not impede the development of renewable energy sources and would not impact energy efficiency goals; therefore, the Project would have no new impact on renewable energy development and energy efficiency. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

Findings

The proposed Project would not have any significant effects relating to energy resources that either have not already been analyzed in the Master EIR or that are more significant than previously analyzed.

Section VII. Geology and Soils

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

The Master EIR discussed the potential effects of development under the 2040 General Plan on geology and soils (see Master EIR, Chapter 4.7 as it relates to geology and soils). The City of Sacramento does not typically experience strong ground shaking resulting from earthquakes and does not include any Alquist-Priolo Earthquake Fault Zones within the Planning Area of the General Plan. There are active faults outside the Planning Area such as the San Andreas (>50 miles from Planning Area), Green Valley (approximately 45 miles), Greenville (approximately 50 miles), or Hunting Creek-Berryessa faults (approximately 40 miles). Chapter 4.7.4 of the Master EIR concludes that there are no geologic or soil concerns associated with any of the Community Plans and therefore potential impacts specific to Community Plans were not further addressed.

a) **No Impact:** See discussion below.

i. **No Impact:** According to the California DOC's Earthquake Zones of Required Investigation, interactive mapping service, the Project site is not located within a designated earthquake fault zone (California Geological Survey, DOC, 2024). Therefore, the Project will not be exposed to significant fault rupture, and the Project would have no impact associated with the rupture of a known earthquake fault. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review.

ii. **No Impact:** According to the California DOC's Earthquake Zones of Required Investigation interactive mapping service, the Project site is not located within an earthquake fault zone and, therefore, will not be exposed to strong seismic ground shaking events (California Geological Survey, DOC, 2024). For these reasons, there would be no impact. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review.

iii. **No Impact:** Liquefaction is a phenomenon where loose, saturated, non-cohesive soils (e.g., silts, sands, and gravels) undergo a sudden loss of strength during earthquake shaking. According to the California DOC's Earthquake Zones of Required Investigation interactive mapping service, the Project site is located within an area not evaluated for liquefaction hazards (California Geological Survey, DOC, 2024). Therefore, the soil at the Project site is not anticipated to become saturated and would not be subject to liquefaction. Specifically, the Project site is located on silt loam soil type, which is defined as a moderately well-drained soil (University of California Davis, 2024).

According to the Geology and Soils Element of the Sacramento County General Plan, the downtown core of the City of Sacramento and the Delta area are the only locations susceptible to liquefaction within Sacramento County (Sacramento County, 2002). The Project site is located in the Fruitridge/Broadway Area of the City, approximately 5.8 miles northeast of the Delta area and approximately 6.0 miles southeast of the City's downtown core, which is defined as "Central City" in the City of Sacramento's Central City Community Plan and 2040 General Plan (City of Sacramento, 2024a).

Due to the considerable distance between the Project site and areas susceptible to liquefaction, and since the site is located on moderately well-drained soil, the Project is unlikely to be subject to a seismic-related ground failure, including liquefaction. For these reasons, no impact would occur. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review.

iv. **No Impact:** According to the California DOC's Earthquake Zones of Required Investigation interactive mapping service, the Project site is not located within an earthquake fault zone but in an area that has not been evaluated for landslide hazard zone (California Geological Survey, DOC, 2024). According to the Geology and Soils Element of the Sacramento County General Plan, the soil throughout the County has a low potential for landslides (Sacramento County, 2002). Further, the Project site is located on and surrounded by a relatively flat topography highly disturbed by industrial uses. For these reasons, it is unlikely that the Project would be exposed to landslides. As such, no impact would occur. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review.

b) **Impact Adequately Addressed in the Master EIR:** The Project site is located on relatively flat property, that was previously graded and highly disturbed before WCO acquired the parcels. The the concrete batch plant equipment is located on a 4.4-acre portion of the large 5.32-acre WCO property. Since a portion of the site would remain ungraded, there would be some potential for soil erosion or loss of topsoil. However, WCO will construct and maintain all stormwater containment structures, including earthen berms, concrete block walls, berms, and a retention basin, which are designed to adequately

capture stormwater runoff from the proposed Project and reduce possible erosion. WCO's existing and planned stormwater containment structures are considered discharge reduction best management practices (BMPs) and are outlined within the site's SWPPP. BMPs do not require the approval of the State Waterboards and are implemented on a site-specific basis for each facility. Through the continued implementation of the Facility's SWPPP, it would remain in place to ensure minimal potential erosion occurs onsite. For these reasons, there would be no new impact due to the Project. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review.

c) **Impact Adequately Addressed in the Master EIR:** The Project site is not within an earthquake hazard zone. Additionally, according to the Geology and Soils Element of Sacramento County's General Plan, the Project site is located outside areas susceptible to liquefication (Sacramento County, 2002). The site is also situated on moderately well-drained soil; therefore, the Project would not be likely to experience liquefication (Sacramento County, 2002). There is a low potential for lateral spreading since the Project site is not expected to experience liquefaction. The Project is also located on relatively flat topography, and because the County's soils have a low potential to experience landslides, there is a low potential for landslides onsite (Sacramento County, 2002). As such, these soil properties, coupled with the generally flat topography of the Project site, would minimize concerns related to unstable soils. Therefore, the Project would not be located on a geologic unit or soil that is unstable or that would become unstable as a result of the Project and would not result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. For these reasons, the project would have no new impact. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review.

d) **No Impact:** According to the University of California Davis SoilWeb interactive mapping service, the Project site is located on silt loam soil type, which can be identified as a moderately well-drained soil (University of California Davis, 2024). This soil type presents a low shrink and swell potential; therefore, the Project would have no impact associated with expansive soils. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review.

e) **No Impact:** The proposed Project would not include the construction of septic tanks or alternative wastewater disposal systems. Existing restroom facilities would continue to be utilized onsite. Therefore, there would be no impact. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review.

f) **Impact Adequately Addressed in the Master EIR:** The proposed Project would not include significant earthwork activities that would result in the destruction of paleontological resources. Specifically, the Project would only include the construction of stormwater containment infrastructure, including earthen berms, concrete block walls, berms, and a retention basin. All construction and grading work would occur in accordance with City, State, and Federal guidelines to minimize potential impacts on paleontological resources. No other grading work would occur as part of the Project. Additionally, the Project site has been used for light-industrial work since at least 2021, and there were no previously identified areas with paleontological resources or unique geological resources onsite. Therefore, the foundations for equipment and structures would create no new impact on unique paleontological resources or unique geological features. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review.

Findings

The proposed Project would not have any significant effects relating to geology and soils resources that either have not already been analyzed in the Master EIR or that are more significant than previously analyzed.

Section VIII. Greenhouse Gas Emissions

VIII. GREENHOUSE GAS EMISSIONS Would the project:	**Significant Impact Peculiar to the Project or the Project Site**	**Significant Impact Due to New Information**	**Impact Adequately Addressed in the Master EIR**	**No Impact**
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 City of Sacramento has a Mediterranean climate, strongly influenced by the Pacific Ocean, with hot, dry summers and mild, rainy winters. Summer highs often exceed 100°F, while winter lows can approach freezing. Average annual rainfall is around 20 inches, and snowfall is very rare (City of Sacramento, 2023).

Global climate change is defined as the change in average meteorological conditions on the earth with respect to temperature, precipitation, and storms. Many scientists believe that the climate shift occurring since the Industrial Revolution (1900) is occurring at a quicker rate and magnitude than in the past. Scientific evidence suggests that climate change is the result of increased concentrations of greenhouse gases (GHG) in the Earth's atmosphere, including carbon dioxide, methane, nitrous oxide, and fluorinated gases. Many scientists believe that the increased rate of climate change is the result of GHGs as a result of human activity and industrialization over the past 200 years.

Emissions of GHGs contributing to climate change are attributable in large part to human activities associated with the industrial/manufacturing, utility, transportation, residential, and agricultural sectors. Therefore, the cumulative global emissions of GHGs contributing to global climate change can be attributed to every nation, region, and city, and virtually every individual on Earth. An individual project's GHG emissions are at a micro-scale level relative to global emissions and effects on global climate change; however, an individual project could result in a cumulatively considerable incremental contribution to a significant cumulative macro-scale impact. As such, impacts related to emissions of GHG are inherently considered cumulative impacts.

A number of regulations currently exist related to GHG emissions, predominantly Assembly Bill (AB) 32, Executive Order S-3-05, and Senate Bill (SB) 32. AB 32 sets forth a statewide GHG emissions reduction target of 1990 levels by 2020 (California Air Resources Board (CARB), 2006). Executive Order S-3-05 sets forth a transitional reduction target of 2000 levels by 2010, the same target as AB 32 of 1990 levels by 2020, and further builds upon the AB 32 target by requiring a reduction to 80 percent below 1990 levels by 2050 (Executive Department, State of California, 2005). SB 32 also builds upon AB 32 and sets forth a transitional reduction target of 40 percent below 1990 levels by 2030 (California Senate, 2016). In order to implement the statewide GHG emissions reduction targets, local jurisdictions are encouraged to prepare and adopt area-specific GHG reduction plans and/or thresholds of significance for GHG emissions.

In response to the requirements of SB 97, the State Resources Agency developed guidelines for the treatment of GHG emissions under CEQA. These new guidelines became state laws as part of Title 14 of the California

Code of Regulations in March 2010. The CEQA Appendix G guidelines were modified to include GHG as a required analysis element. A project would have a potentially significant impact if it:

- Generates GHG emissions, either directly or indirectly, that may have a significant impact on the environment;
- Conflicts with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

Section 15064.4 of the Code specifies how significance of GHG emissions is to be evaluated. The process is broken down into quantification of Project-related GHG emissions, making a determination of significance, and specification of any appropriate mitigation if impacts are found to be potentially significant. Emissions identification may be quantitative, qualitative or based on performance standards. CEQA guidelines allow the lead agency to "select the model or methodology it considers most appropriate." At each of these steps, the new GHG guidelines afford the lead agency with substantial flexibility.

The Master EIR evaluated the effects associated with the implementation of future growth envisioned in the General Plan and CAAP on climate change in the Planning Area from GHG emissions. See Master EIR, Section 4.8, Greenhouse Gases. The Master EIR identified potential impacts from GHG emissions (Impact 4.8-1) and concluded that impacts would be less than significant with the implementation of applicable regulations and general plan and CAAP policies.

The 2040 General Plan Environmental Resources and Constraints Element outlines collaborative actions to reduce air pollution and includes policies identified as mitigating the potential effects of development that could occur under the 2040 General Plan. Specifically, Policy ERC-4.2 (Project Design) encourages the use of new technologies, materials, and design techniques in private development to reduce air pollution, noise, excess heat, and other environmental impacts; and Policy ERC-4.5 (Construction Emissions) requires that construction and grading activities minimize air quality impacts by implementing appropriate measures and best practices established by SMAQMD.

The City of Sacramento adopted its Climate Action and Adaptation Plan (CAAP) in 2024 (City of Sacramento, 2024). The Sacramento CAAP was designed with the goal of achieving compliance with the foregoing State requirements for the reduction of GHG emissions, as well as State goals for the conservation of natural resources. The CAAP is implemented through municipal and communitywide emissions reduction and resource conservation measures. **Table 5** presents the strategies adopted by the City of Sacramento in the 2024 CAAP for reducing GHG emissions to achieve the 2045 goal laid out by CARB.

The 2040 General Plan incorporates GHG emissions reduction targets from the CAAP. General Plan Policy ERC-9.1 (Communitywide GHG Reduction) mandates the implementation of the CAAP; Policy ERC-9.5 (Climate Change Assessment and Monitoring) commits the City to ongoing assessment and monitoring of climate change impacts; and Policy ERC-9.2 (Additional GHG Emission Programs) encourages the evaluation of new policies, programs, and regulations to support long-term GHG reduction goals.

Table 5 – GHG Reduction Strategies of the Sacramento CAAP (2024)

Measure	Description	Applicability/Conformance
Strategy 1: Built Environment		

Measure	Description	Applicability/Conformance
MEASURE E-1	Support SMUD as it implements the 2030 Zero Carbon Plan.	N/A
MEASURE E-2	Eliminate natural gas in new construction.	N/A
MEASURE E-3	Transition natural gas in existing buildings to carbon free electricity by 2024.	N/A
MEASURE E-4	Increase the amount of electricity produced from local resources and work with SMUD to install additional local storage by 2030.	N/A
MEASURE E-5	Support infill growth with the goal that 90% of new growth is in established and center/corridor communities and 90% small-lot and attached homes by 2040, consistent with the regional Sustainable Communities Strategy. Project-level VMT should be 15% below (or 85% of) the regional average.	Applies. The proposed Project would provide ready-mix concrete building materials for local and regional infill developments.
Strategy 2: Mobility		
MEASURE TR-1	Improve active transportation infrastructure to achieve 6% active transportation mode share by 2030 and 12% by 2045.	Applies. The proposed Project would provide ready-mix concrete building materials for local and regional infill developments, including transportation infrastructure.
MEASURE TR-2	Support public transit improvements to achieve 11% public transit mode share by 2030 and maintain through 2045.	Applies. The proposed Project would provide ready-mix concrete building materials for local and regional infill developments, including public transit improvements.
Measure TR-3	Achieve zero-emission vehicle (ZEV) adoption rates of 28% for passenger vehicles and 22% for commercial vehicles by 2030 and 100% for all vehicles by 2045.	N/A
Strategy 3: Waste		
MEASURE W-1	Work to reduce organic waste disposal 75% below 2014 levels by 2025.	N/A
Strategy 4: Water and Wastewater		

Measure	Description	Applicability/Conformance
MEASURE WW-1	Reduce water utility emissions (in metric tons [MT] of carbon dioxide equivalent [CO2e] per million gallon delivered) by 100% by 2030 and maintain that through 2045.	N/A
MEASURE WW-2	Reduce wastewater emissions by 22% by 2030 and 40% by 2045.	N/A
Strategy 5: Carbon Sequestration		
MEASURE CS-1	Increase urban tree canopy cover to 25% by 2030 and 35% by 2045.	N/A

Table 6 presents a summary of the proposed Project's related GHG operational emissions in carbon dioxide equivalent (CO2e) in metric tons (MT). The CO2e includes carbon dioxide (CO2), methane (CH4) and nitrogen dioxide (N2O). This includes mobile sources, and process sources; the indirect GHG emissions from electricity usage is also estimated.

Table 6 – Project Operational GHG Emissions (MT/Year)

Category	CO2e
Mobile Sources	470.69
Grid Emissions	7.78
MT/Year	**478.47**

Source: Trinity Consultants, 2025.

a) **Impact Adequately Addressed in the Master EIR:** The projected increase in CO2e emissions associated with the proposed Project's operations would be approximately 478 MT/year. New GHG emissions sources that would be introduced by the proposed Project have been quantified for the proposed Project for informational purposes. Specifically, the 2022 Scoping Plan (CARB, 2022), which is the State's blueprint for how GHG reductions would be achieved, generally regulates fuels and electricity at a level in the supply chain above the proposed Project, such that the proposed Project has no choice but to use energy in California that is already regulated through state-wide programs such as the Cap-and-Trade Program and the Low Carbon Fuel Standard (LCFS). Ultimately, the proposed Project is intended to assist in regional development which would be compliant with the City of Sacramento CAAP (City of Sacramento, 2024). Because electricity and mobile fuels emissions are part of the statewide Cap-and-Trade Program, GHG impacts from proposed Project operations are considered individually and cumulatively less than significant and therefore there would be no new impact. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

b) **Impact Adequately Addressed in the Master EIR:** The purpose of the proposed Project is to mix and distribute cement for the use in infill, local and regional development. The proposed Project would use local materials to reduce VMT and would support regional development as part of the City's strategy to develop infrastructure while reducing GHG emissions.

As noted above, the City is committed to reducing GHG emissions through the implementation of reduction measures outlined in the CAAP. As proposed, there are no aspects of the proposed Project that would conflict with City policies aimed at reducing GHG emissions, as CAAP policies are either not applicable to the proposed Project or the proposed Project is in compliance with CAAP policies (City of Sacramento, 2024). Therefore, no new impact would occur. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

Findings

The proposed Project would not have any significant effects relating to GHG emissions that either have not already been analyzed in the Master EIR or that are more significant than previously analyzed.

Section IX. Hazards and Hazardous Materials

IX. HAZARDS AND HAZARDOUS MATERIALS Would the project:	**Significant Impact Peculiar to the Project or the Project Site**	**Significant Impact Due to New Information**	**Impact Adequately Addressed in the Master EIR**	**No Impact**
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 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?	☐	☐	☐	☒

The Master EIR, Chapter 4.9, evaluated effects of development related to hazardous materials, emergency response, and wildland fire hazards. The Master EIR determined that implementation of the 2040 General Plan may result in exposure of people to contaminated soil, hazardous building materials, or contaminated groundwater during construction activities. Impacts identified during construction activities were found to be less than significant with adherence to applicable regulations and General Plan policies. Specifically, Policy EJ-1.8 (Site Contamination) ensures that prior to development, site investigations are conducted and remediation and construction techniques are implemented to protect construction workers, future occupants, and adjacent residents from contamination; Policy PFS-5.8 (Household Hazardous Waste) promotes the safe disposal of household hazardous waste; and Policy PFS 2.3 (Evacuation Routes) directs the City to partner with Caltrans and neighboring jurisdictions to protect critical evacuations routes and

develop contingency plans should roads be inoperable due to flooding or wildfire. Additionally, compliance with federal, state, and local regulations for hazardous materials handling and abatement would further mitigate risks.

The Master EIR concluded that risks related to cumulative exposure to hazardous materials and wildland fire hazards were site-specific and not cumulatively considerable. Emergency response access impacts would be minimized through Traffic Management Plans and adherence to building and fire codes.

For the purposes of this Modified Initial Study/15183 Checklist, an impact is considered significant if the Proposed Project would:

- Expose people to contaminated soil during construction activities.
- Expose people to hazardous building materials (e.g., asbestos and lead-based paint) or other hazardous materials; or
- Expose people to contaminated groundwater during construction activities or dewatering activities.
- Obstruct emergency response or access such that response times are substantially affected.

a) Impact Adequately Addressed in the Master EIR: The proposed Project includes the transportation and handling of various raw materials to the Project site and the transportation of ready-mixed concrete to customers. The proposed Project operations receive approximately 20 loads per day of raw materials and delivers up to 24 loads per day of ready-mixed concrete. Hazardous materials used onsite are shown above in **Table 1** of the Project Description. The proposed Project is required to prepare and comply with an HMBP submitted to the Sacramento County Environmental Management Department that addresses potential effects to the public or the environment that could be attributed to the transportation, use, and disposal of hazardous materials associated with the proposed Project. All materials would be handled in accordance with their Safety Data Sheet (SDS) requirements. The renewable diesel and red dye diesel are flammable and therefore would be stored in compatible aboveground tanks with secondary containment and handled within specification limits. Euco Shield is corrosive to metals and would be stored in compatible containers with secondary containment. The Accelguard-NCA is corrosive and would be stored in compatible containers with secondary containment. Therefore, any risk of release into the environment from hazardous materials is minimal and would be managed in accordance with SDS guidance. The proposed Project would generate waste oil during operations, which is managed and disposed of in accordance with state and federal hazardous waste regulations.

The concrete batch plant also is required to prepare and implement an SPCC Plan in accordance with 40 CFR 112 since the aboveground oil storage capacity onsite is 2,775 gallons (EPA, 1973). The concrete batch plant is considered a Tier I qualified facility under SPCC regulations, and the site complies with all applicable requirements including secondary containment, inspections, and spill response procedures (EPA, 1973). For these reasons, there would be a no new hazards impact through the routine transport, use or disposal of hazardous materials. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

b) Impact Adequately Addressed in the Master EIR: The proposed Project is required to prepare and comply with an HMBP and SPCC Plan, including emergency response, contingency planning, and spill response. This HMBP is submitted to the Sacramento County Environmental Management Department and puts in place management and emergency response protocols to avoid creating 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. As previously stated, all materials are handled in accordance with their SDS requirements, stored in compatible containers, and have secondary containments. Therefore, any risk of spill would be minimal and would be managed in accordance with SDS guidance. The SPCC Plan includes spill prevention and response procedures to avoid creating a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions

involving the release of oil. For these reasons, there would be no new hazards impact. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

c) No Impact: The nearest school is approximately 1.27 miles southwest of the proposed Project site (Florin Elementary), which is more than one quarter mile. Therefore, there would be no impact. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

d) No Impact: The proposed Project is not on the Cortese List per Government Code Section 65962.5 (Department of Toxic Substances Control (DTSC), 2024). Therefore, there would be no impact. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

e) No Impact: The proposed Project is not located within an airport land use plan. The concrete batch plant is 4.5 miles southwest of Sacramento Mather Airport and 5.1 miles east of Sacramento Executive Airport, which represents the closest airports in the Project vicinity. The proposed Project location is not located within the Sacramento Mather Airport or the Sacramento Executive Airport's land use plan. Therefore, there would be no impact. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

f) Impact Adequately Addressed in the Master EIR: The site has an existing HMBP and SPCC Plan, which includes an emergency response and contingency plan. The existing HMBP and SPCC Plan would be updated as needed to account for any changes resulting from the proposed Project. The proposed Project would not adversely change the emergency response or evacuation protocols for the facility, and therefore, there would be no new impact. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

g) No Impact: The site is not located within or near a State Responsibility Area (SRA) or lands considered very high fire hazard severity zones (FHSZ) based on the California Department of Forestry and Fire Protection (Cal Fire) FHSZ viewer (California Department of Forestry and Fire Protection (CalFire), 2025). The nearest FHSZ is located over 10 miles east of the Project site. Further, the proposed Project is an existing concrete batch plant on an already graded area. For these reasons, there would be no wildfire risk from the proposed Project. Therefore, there would be no impact. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

Findings

The proposed Project would not have any significant effects relating to hazards and hazardous materials that either have not already been analyzed in the Master EIR or that are more significant than previously analyzed.

Section X. Hydrology and Water Quality

X. HYDROLOGY AND WATER QUALITY Would the project:	**Significant Impact Peculiar to the Project or the Project Site**	**Significant Impact Due to New Information**	**Impact Adequately Addressed in the Master EIR**	**No Impact**
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 offsite;	☐	☐	☒	☐
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv. impede or redirect flood flows?	☐	☐	☒	☐
d) 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?	☐	☐	☒	☐

The proposed Project site is located within the Fruitridge Broadway Community Plan area. The Project site is a developed manufacturing zone with an existing building and graded area. The Project will include the addition on onsite stormwater retention.

For projects that would disturb more than 50 cubic yards of soil, construction activities would be required to adhere to the City's Grading Ordinance (Title 15 Buildings and Construction, Chapter 15.88 Grading, Erosion and Sediment Control). The grading ordinance was enacted for the purpose of regulating grading on property within the City limits to avoid pollution of watercourses with nutrients, sediments, or other materials generated or caused by surface water runoff. The ordinance regulates site operations and conditions in accordance with the City's NPDES requirements, issued by the California Central Valley RWQCB, and to ensure that the intended use of a graded site within the City limits is consistent with the underlying land use designation and zoning as well as the goals and policies in the City's General Plan, as

well as any specific plans adopted and all applicable City ordinances and regulations. The grading ordinance is intended to control all aspects of grading operations within the City limits as a means to control construction activities in order to minimize, to the maximum extent practicable, the degradation of water quality for any receiving waters. Policy ERC-1.4 (Construction Site Impacts) requires contractors to comply with the City's erosion and sediment control ordinance through implementation of construction measure (i.e., BMPs) that are protective of water quality for any off-site discharges.

The City's Stormwater Quality Improvement Program (SQIP), first established in 1990, requires construction activities to reduce any pollution carried by stormwater into local creeks and rivers. The SQIP is based on the NPDES municipal stormwater (MS4) discharge permit issued by the RWQCB (Order R5- 2016-0040-009, NPDES No. CAS00085324) (CVRWQCB, 2016). The SQIP is a comprehensive program that includes pollution reduction activities for construction sites, industrial sites, illegal discharges and illicit connections, new development, and municipal operations.

Chapter 4.10, Hydrology Water Quality and Flooding of the 2040 General Plan Master EIR evaluates the potential effects of the implementation of the buildout of the 2040 General Plan as they relate to surface water, groundwater, flooding, stormwater, and water quality. Potential effects include water quality degradation due to construction and operational activities (Impacts 4.10-1) and exposure of people to flood risks (Impacts 4.10-2). 2040 General Plan policies relevant to hydrology, water quality, and flooding and the Proposed Project include:

- Policy ERC 1.3: Runoff Contamination. The City shall protect surface water and groundwater resources from contamination from point (single location) and non-point (many diffuse locations) sources, as required by federal and State regulations.
- Policy ERC 1.4: Construction Site Impacts. The City shall require new development to minimize disturbances of natural water bodies and natural drainage systems caused by development, implement measures to protect areas from erosion and sediment loss, and continue to require construction contractors to comply with the City's erosion and sediment control ordinance and stormwater management and discharge control ordinance.
- Policy ERC 5.2: Reducing Storm Runoff. The City shall encourage project designs that minimize drainage concentrations, minimize impervious coverage, utilize pervious paving materials, utilize low impact development (LID) strategies, and utilize Best Management Practices (BMPs) to reduce stormwater runoff.
- Policy ERC 6.1: Protection from Flood Hazards. The City shall strive to protect life, the natural environment, and property from natural hazards due to flooding.

a) No Impact: The proposed Project is eligible as a "no discharge" facility under the California Stormwater IGP as the site is engineered to contain the maximum historic precipitation event and is not connected to a municipal storm sewer system. The proposed Project would capture all stormwater onsite using earthen berms, concrete block walls, berms, and a retention basin. A geotechnical report performed by a licensed Geotechnical Engineer will be required to demonstrate this project will be able to retain flows and meet the 48-hour drawdown time. The proposed Project is made up of both impervious and pervious surfaces with the potential for infiltration of stormwater to groundwater. The ready-mix concrete batch plant follows stormwater BMPs to minimize stormwater pollution from industrial pollutants as outlined in the site-specific SWPPP. The concrete batch plant will comply with the applicable state and federal regulations for stormwater and groundwater discharges. For these reasons, the Project would have a less than significant potential to violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. As such, the Project's impact in this regard would be less than significant. Based on the above, the proposed Project would not result in any

peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

b) Impact Adequately Addressed in the Master EIR: The proposed Project would not substantially decrease or otherwise affect groundwater supplies and recharge. The Project site is located within a portion of the Sacramento Valley South American Groundwater Subbasin, which is monitored by the Sacramento County Groundwater Sustainability Agency (GSA). As discussed in in the Project Description and response to CEQA Checklist question V.b) above, the concrete batch plant is located within an existing graded area (Sacramento County Groundwater Sustainability Agency (GSA), 2025). According to the 2021 South American Subbasin Groundwater Sustainability Plan, the South American Subbasin has a sustainable yield of approximately 210,000 to 270,000 acre-feet per year (AFY) (South American Subbasin Groundwater Sustainability Plan, 2021). The proposed Project's water demand is minimal as municipal water is used only in the previously permitted light industrial building which has been operating since 2021. Therefore, the proposed Project would not adversely impact the quality of groundwater resources. For these reasons, the Project would have a less than significant potential to decrease groundwater supplies or interfere substantially with groundwater recharge to impede sustainable groundwater management of the basin. Therefore, there would be no new impacts. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

c) Impact Adequately Addressed in the Master EIR: The concrete batch plant will add some impervious surfaces for additional truck circulation as well as onsite stormwater retention in the rear four parcels as illustrated in Figure 4. The nearest stream or river to the concrete batch plant is Morrison Creek. The proposed Project would not alter the course of Morrison Creek as it is located approximately 0.25 miles from the concrete batch plant. As discussed above in response to CEQA Checklist questions X.a) and X. b), any stormwater within the Project site would not be discharged to surface waters. Therefore, there would be a less than significant impact. See responses to CEQA Checklist questions to X.c) i, ii, iii, and iv, below for more detail.

i. **Impact Adequately Addressed in the Master EIR:** The concrete batch plant is engineered to contain stormwater from the maximum precipitation event. Any silt or other sediment from stormwater is captured onsite. Therefore, the Project would not increase erosion or siltation on- or offsite. For these reasons, there would be no new impact. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

ii. **Impact Adequately Addressed in the Master EIR:** As discussed above, the proposed Project does not add any impervious surfaces or alter the surface characteristics to concrete batch plant. Therefore, the Project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or offsite. For these reasons, there would be no new impact. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

iii. **Impact Adequately Addressed in the Master EIR:** As discussed above, any stormwater within the ready-mix concrete batch plant would be adequately contained within the site berms and retention pond and would not discharge to stormwater drainage systems. Therefore, the Project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. For these reasons, no new impact would occur. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

iv. **Impact Adequately Addressed in the Master EIR:** According to Federal Emergency Management Agency's (FEMA) National Flood Hazard Layer (NFHL) Viewer, the Project site is classified as Flood Zone X, which is an area with 0.2% chance of annual flood hazard (Federal Emergency Management Agency (FEMA), 2025) and is not located on any floodways. Since the site has minimal flood hazards, the Project would not impede or redirect flood flows. Therefore, no new impact would occur. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

d) No Impact: The proposed Project is not located in a flood, hazard, tsunami, or seiche zone and, therefore, would not risk the release of pollutants due to Project inundation. According to FEMA's NFHL Viewer, the Project site is classified as Flood Zone X, which is an area with 0.2% chance of annual flood hazard (Federal Emergency Management Agency (FEMA), 2025). There are no tsunami nor seiche zones near the Project site. Therefore, since the Project site is located outside of flood hazards, tsunamis, or seiche zones, there is no risk of release of pollutants due to Project inundation. As such, there would be no impact. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

e) Impact Adequately Addressed in the Master EIR: The Project site is located within a portion of the Sacramento Valley South American Groundwater Subbasin, which is monitored by the Sacramento County GSA (Sacramento County Groundwater Sustainability Agency (GSA), 2025). The South American Subbasin is subject to the 2021 South American Subbasin Sustainability Plan pursuant to the 2014 Sustainable Groundwater Management Act (SGMA) (South American Subbasin Groundwater Sustainability Plan, 2021). As discussed above, the proposed Project's water demand is minimal as municipal water is used only in the previously permitted light industrial building which has been operating since 2021. Additionally, any stormwater would be contained within concrete batch plant. Therefore, the Project would not conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan. For these reasons, there would be no new impact. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

Findings

The proposed Project would not have any significant effects relating to hydrology and water quality that either have not already been analyzed in the Master EIR or that are more significant than previously analyzed.

Section XI. Land Use and Planning

XI. LAND USE AND PLANNING Would the project:	**Significant Impact Peculiar to the Project or the Project Site**	**Significant Impact Due to New Information**	**Impact Adequately Addressed in the Master EIR**	**No Impact**
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?	☐	☐	☒	☐

The Master EIR, Chapter 3, evaluated effects of development related to land use, population and housing. The Land Use and Placemaking Element provides all of the goals and policies from the 2040 General Plan which are relevant to land use, Populations, employment and housing within the general plan area.

a) **No Impact:** The Project site is located on a 5.32-acre property in the Fruitridge Broadway Community Plan area of the City of Sacramento. The proposed Project is an operation that is a conditioned allowed "manufacturing" use under M-2(S) zoning and is adjacent to and surrounded by other mixed-use industrial sites in all four directions (see **Figure 3** and **Table 2**). As described above in the Project Description, the Project site is located within an area designated as IMU in the City General Plan and is located within a M-2(S) zone signifying heavy industrial landscape setback. The City of Sacramento General Plan states that this designation should only be next to a residential neighborhood with substantial buffers in place (City of Sacramento, 2024). Additionally, the Project would operate in accordance with the zoning and General Plan designations for this site. As such, the Project site would not serve as a means of moving through or connecting to nearby established communities. Therefore, the proposed Project would not physically divide an established community, and no impact would occur. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

b) **Impact Adequately Addressed in the Master EIR:** The Project is consistent with the City's General Plan and Zoning Ordinance. The proposed Project is the operation of a concrete mixing facility and its affiliated office space, which is allowable and consistent with the applicable General Plan and Zoning Ordinance land use designations, goals, and policies for general manufacturing in an industrial zone. According to the City's General Plan, compatible public, quasi-public, supportive, and special uses are permitted use within the IMU zoning designations (City of Sacramento, 2024). Additionally, the proposed Project is consistent with Goal LUP-7, which promotes industrial opportunities in suitable locations to provide employment for Sacramento residents and promote inclusive economic growth in the city. Therefore, the Project would not require changes to the City's existing General Plan or Zoning designations, nor would the Project conflict with any land use designations/land use plans. As such, the Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation, and there would be no new impact. Based on the above, the proposed Project

would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

Findings

Based on the above consistent with the General Plan and Sacramento City Code, impacts related to land use were adequately addressed in the Master EIR. The proposed Project would not have any significant effects relating to land use planning that either have not already been analyzed in the Master EIR or that are more significant than previously analyzed.

Section XII. Mineral Resources

XII. MINERAL RESOURCES Would the project:	**Significant Impact Peculiar to the Project or the Project Site**	**Significant Impact Due to New Information**	**Impact Adequately Addressed in the Master EIR**	**No Impact**
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?	☐	☐	☐	☒

The Master EIR discussed the potential effects of development under the 2040 General Plan on mineral resources (see Master EIR, Chapter 4.7 as it relates to mineral resources). The Master EIR concludes that the 2040 General Plan would not result in loss of the availability of known mineral resources that would be of value and impacts would be less than significant.

a) **No Impact:** The proposed Project would not result in the loss of availability of known mineral resources that would be of value to the region and residents of the State. According to the California Mineral Resources Data Portal, the Project site is located within the Portland Cement Concrete-Grade Aggregate and Kaolin Clay Resources mineral land classification (DOC California Geological Survey, 2024). However, the Project would not include onsite mining operations and thus would not interfere with the aforementioned mining land use. All materials needed for the operations of the proposed Project would be transported to the facility for processing and mixing. Additionally, upon review of the City of Sacramento General Plan, there were no identified mineral resource zones (MRZs) on the project site (City of Sacramento, 2024). Therefore, no impact would occur. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

b) **No Impact:** The City General Plan identified no mineral resource zones (City of Sacramento, 2024). Additionally, the Project would not conduct mineral extraction activities, and thus would not interfere with any existing, locally important mineral resource recovery sites. Therefore, the proposed Project would have no impact on 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. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

Findings

The proposed Project would not have any significant effects relating to mineral resources that either have not already been analyzed in the Master EIR or that are more significant than previously analyzed.

Section XIII. Noise

XIII. NOISE Would the project:	**Significant Impact Peculiar to the Project or the Project Site**	**Significant Impact Due to New Information**	**Impact Adequately Addressed in the Master EIR**	**No Impact**
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

The Master EIR, Section 4.11, evaluated the potential for development under the 2040 General Plan to increase noise levels in the community. New noise sources include vehicular traffic, aircraft, railways, light rail, and stationary sources. Traffic noise was identified as the primary contributor to ambient noise levels, particularly along major roadways such as Interstate 5, Interstate 80, U.S. Highway 50, State Route 99, and State Route 160. The General Plan policies establish exterior (Policy ERC-10.1) and interior (Policy ERC-10.3) noise standards to mitigate impacts from transportation and stationary sources of noise.

A variety of policies provide standards for the types of development envisioned in the General Plan. Policy ERC-10.2 emphasizes controlling noise at the source through site design, building orientation, and hours of operation to minimize impacts on sensitive receptors. Policy ERC-10.9 regulates construction noise by limiting hours of operation and requiring noise attenuation measures. Policy ERC-10.8 promotes the use of alternative paving materials, such as rubberized asphalt, to reduce roadway noise. Additionally, Policy LUP-1.14 requires deed notices for developments within airport-defined overflight zones to inform future residents of potential noise impacts.

The Master EIR found that several noise-related impacts remain significant and unavoidable. For example, exterior noise levels (Impact 4.11-1) were predicted to exceed City thresholds at numerous roadway segments under both baseline and cumulative scenarios, with increases of up to 5.5 dBA in certain locations. Temporary construction noise (Impact 4.11-2) was identified as a potentially significant impact due to activities like pile driving and large concrete pours, especially near noise-sensitive receptors. Vibration impacts (Impact 4.11-3) from construction and railway operations were also determined to be potentially significant, particularly for historic structures and sensitive uses near rail lines.

Mitigation measures, such as noise barriers, setbacks, and construction noise management plans, were evaluated but determined to be infeasible or insufficient in some scenarios due to constraints like right-of-way limitations or the nature of the noise sources. Consequently, these impacts remain significant and unavoidable, particularly for existing noise-sensitive land uses adjacent to high-traffic corridors or active construction zones.

The proposed Project design (Figure 4) includes the addition of block walls on the back four parcels along the property line in the locations where there currently are no existing block walls in place. These design measures are in compliance with noise mitigation measure in the 2040 General Plan EIR (City of Sacramento, 2024).

a) Impact Adequately Addressed in the Master EIR: The Project would not generate a substantial temporary or permanent increase in ambient noise levels in excess of applicable standards in the vicinity of the Project. The Project is located within an existing industrial area, is an operation that is allowed "manufacturing" under M-2(S) zoning, surrounded by existing industrial developments which are within an area set away from residential communities given the background noise environment of an industrial area. The Project involves the operation of a cement ready-mix operation. While noise may be generated as a result of cement ready-mix activities, these would be localized to the center of the existing rear parcels. Facility operations would be six days a week during the morning hours. Noise levels would be dampened offsite with the concrete batch plant's placement behind the existing industrial buildings and operations surrounding the Project site. Buildings and set back from the public roadway attenuate (reduce in volume) the noise levels. For these reasons, the proposed Project would not increase the long-term ambient noise levels of the surrounding vicinity. Therefore, the Project's impact would be cumulatively *de minimis* when considered alongside the existing industrial noise levels surrounding the Project site. For these reasons, the Project would have no new impact on ambient noise levels in excess of established standards. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

b) Impact Adequately Addressed in the Master EIR: The Project would not generate excessive groundborne vibration or groundborne noise levels. The Project might include the use of mobile construction equipment that would generate minimal ground vibration during the potential additional site grading in the rear parcels of the Project site. However, the Project would not result in vibrations that would be felt outside of the existing industrial area. As discussed in response to CEQA Checklist question III.c) above, the Project site is approximately 2,560 feet southeast of the nearest residential neighborhood. Given the placement of buildings to shield the operations and the distance to the nearest residences, vibration levels resulting from the Project would be below the threshold of human perception. Therefore, the Project would have no new groundborne vibration impact. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

c) No Impact. The Project is not located within two (2.0) miles of any private or public airports or airstrips or in an area governed by an airport land use plan. The concrete batch plant is 4.5 miles southwest of Sacramento Mather Airport and 5.1 miles east of Sacramento Executive Airport, which represent the closest airports in the Project vicinity. The proposed Project site is not located within the Sacramento Mather Airport or the Sacramento Executive Airport's land use plan. Therefore, the Project would not expose people residing or working in the Project area to excessive noise levels and there would be no impact. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

Findings

The proposed Project would not have any significant effects relating to noise that either have not already been analyzed in the Master EIR or that are more significant than previously analyzed.

Section XIV. Population and Housing

XIV. POPULATION AND HOUSING Would the project:	**Significant Impact Peculiar to the Project or the Project Site**	**Significant Impact Due to New Information**	**Impact Adequately Addressed in the Master EIR**	**No Impact**
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?	☐	☐	☐	☒

The Master EIR, Chapter 3, evaluated effects of development related to land use, population and housing. The Land Use and Placemaking Element provides all of the goals and policies from the 2040 General Plan which are relevant to land use, Populations, employment and housing within the general plan area.

The Proposed Project would include the final grading and operating of the Ready-Mix Concrete Batch Plant in the Fruitridge Broadway Community Plan area. The proposed Project would not generate any housing and therefore its operations would not add to the population in the City.

a) **Impact Adequately Addressed in the Master EIR:** The Project would have 17 full-time employees onsite. It is assumed that any new employee would be local and regional residents already in the Project vicinity. In addition, according to the State of California Department of Finance (CADF), the total population within the City was 519,466 on January 1st, 2023 and increased to 520,407 by January 1st, 2024, which is a 0.18% population increase between 2023 and 2024 (State of California Department of Finance (CADF), 2024); (CADF, 2024). Therefore, if the employees were to relocate from outside the City to the Project region, the Project would create a maximum potential for 17 more opportunities of employment to the City's existing labor pool, which cumulatively would represent only a local increase in population of 0.003% when compared to the CADF projections. Based on the very small increment of potential population growth from the Project due to employment opportunities, the population generation associated with the Project would not 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) that would exceed local or regional projections. Therefore, there would be no new impact. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

b) **No Impact:** The Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. There are no housing units onsite, nor are any proposed. As mentioned in the Project Description above, the Project is approximately 2,560 feet east of the nearest residential neighborhood and approximately 3,400 feet east of the nearest rail line (Sacramento Regional Transit District's light rail). Due to these reasons, no impact would occur. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

Findings

The proposed Project would not have any significant effects relating to population and housing that either have not already been analyzed in the Master EIR or that are more significant than previously analyzed.

Section XV. Public Services

XV. PUBLIC SERVICES Would the project:	**Significant Impact Peculiar to the Project or the Project Site**	**Significant Impact Due to New Information**	**Impact Adequately Addressed in the Master EIR**	**No Impact**
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	☐	☐	☒	☐
I. Fire protection?	☐	☐	☒	☐
II. Police protection?	☐	☐	☒	☐
III. Schools?	☐	☐	☒	☐
IV. Parks?	☐	☐	☒	☐
V. Other public facilities?	☐	☐	☒	☐

The Master EIR discussed the potential effects of development under the 2040 General Plan on public services (see Master EIR, Chapter 4.12).

a) **Impact Adequately Addressed in Master EIR**: See discussion below.

I. **Impact Adequately Addressed in the Master EIR:** The nearest fire stations to the Project site are Sacramento Fires Station 10 and Sacramento Fire Station 60, which are approximately 3.3 to 4 miles to the north and to the northwest of the site, respectively. The Sacramento Fire District stations provide fire protection and emergency services for the City of Sacramento, including the Project site. The proposed Project would increase the number of materials stored onsite that are necessary for the concrete ready-mix operation. There would be materials stored onsite, and those materials used in the ready-mix operation that are flammable are discussed above in CEQA Checklist Section IX. Materials would be stored in accordance with local, state and federal regulations as well as in accordance with the material's SDS to reduce the risk of ignition. Additionally, the ready-mix operation is outside and with its own fire suppression system. WCO would also maintain fire extinguishers onsite in accordance with local, state and federal regulations. In the unlikely event of a fire originating from the Project site, Sacramento Fire District Stations 10 and 60 would be able to reach the Project site in a timely manner and would have sufficient access/infrastructure to control the fire sufficiently. For these reasons, the Project would not pose a significant fire hazard, nor would the Project be a candidate to cause a significant demand for fire protection services. Therefore, the Project would have no new impact on the performance of fire protection services. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

II. **Impact Adequately Addressed in the Master EIR:** The nearest police station to the Project site is the Sacramento Police Department, located at 5770 Freeport Boulevard #200, Sacramento, CA 95822, which is approximately 7-8 miles west of the site. The Sacramento Police Station provides police protection and emergency services for the City, including the Project site. The Project would not involve land uses or activities that would likely attract criminal activity, and unauthorized trespassing is considered unlikely given that the Project would only store materials used to concrete ready-mix operation. Therefore, given the Project site is within an existing IMU area, the Project would not substantially increase the demand for law enforcement beyond that already existing at the Project site, and there would be no new impact. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

III. **Impact Adequately Addressed in the Master EIR:** The Project would not directly add to the existing demand on local schools. The Project would include 17 employees. The Project is not anticipated to generate any new direct demand for the local schools as the Project would not induce substantial population growth in the City. It is assumed that any new employee would be local and regional residents and therefore not create a new or increased demand for local schools. The Project itself would also contribute City taxes to the general fund, which in turn would support school districts. As such, the Project would have no new impact on schools. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

IV. **Impact Adequately Addressed in the Master EIR:** The Project would not directly add to the existing demand of local recreational facilities. The Project includes 17 employees. As discussed above, these 17 employees would not induce substantial population growth within the local community. The Project would not induce any new demand for parks or other recreational facilities. Therefore, there would be no new impact to recreational facilities. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

V. **Impact Adequately Addressed in the Master EIR:** Other public facilities include libraries and general municipal services. Since the Project would not directly induce substantial population growth, it would not increase the use or need of such public services within the City. Thus, no new public facilities impact. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

Findings

The proposed Project would not have any significant effects relating to public services that either have not already been analyzed in the Master EIR or that are more significant than previously analyzed.

Section XVI. Recreation

XVI. RECREATION Would the project:	**Significant Impact Peculiar to the Project or the Project Site**	**Significant Impact Due to New Information**	**Impact Adequately Addressed in the Master EIR**	**No Impact**
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

The Master EIR discussed the potential effects of development under the 2040 General Plan on recreational resources in Chapter 4.12).

a) **Impact Adequately Addressed in the Master EIR:** The Project would require 17 employees, which is not substantial and would not induce population growth. Because the Project would not induce substantial population growth within the City of Sacramento, the Project would also not result in a substantial increase in the use of the existing recreational needs and settings. Therefore, the Project would result in no new impact on 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. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

b) **No Impact:** The facility will operate with 17 employees, most of whom are already working for the WCO. For these reasons, the Projectwould not cause a substantial increase in the City's population, and thus would not require the construction or expansion of recreational facilities. In addition, the proposed Project would operate a concrete mixing facility located entirely within the parcels described in the Project Description above and would not include any new recreational facilities. The Project does not propose any construction of additional recreational facilities. Therefore, the Project would not include recreational facilities nor require the construction or expansion of recreational facilities. The Project would not have an adverse physical effect on the environment in this regard, and no impacts would occur. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

Findings

The proposed Project would not have any significant effects relating to recreation that either have not already been analyzed in the Master EIR or that are more significant than previously analyzed.

Section XVII. Transportation

XVII. TRANSPORTATION Would the project:	**Significant Impact Peculiar to the Project or the Project Site**	**Significant Impact Due to New Information**	**Impact Adequately Addressed in the Master EIR**	**No Impact**
a) Conflict with program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) Would the project 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?	☐	☐	☒	☐

Transportation and circulation were discussed in the Master EIR in Chapter 4.14. Various modes of travel were included in the analysis, including vehicular, transit, bicycle, pedestrian, aviation, waterways, and railways. Provisions of the 2040 General Plan that provide substantial guidance include Mobility Goal M- 1, calling for an equitable, sustainable multimodal transportation system that provides a range of viable and healthy travel choices for users of all ages, backgrounds, and abilities; Policy M-1.11, which promotes increased bicycling and walking; Policy M-1.22, which promotes increased transit ridership; and Policy LUP-1.1, which promotes a land- and resource-efficient development pattern and the placement of infrastructure to support efficient delivery of public services and infrastructure and conserve open space, reduce vehicle miles traveled, and improve air quality.

The Master EIR concluded that the General Plan development would result in less than significant effects with respect to VMT, public transit, and bicyclists and pedestrians.

Methodology

Table 7 presents a summary of proposed Project trip activity levels for materials, end products and waste streams. The site receives about 20 loads per day from dump trucks delivering raw materials for use onsite; those dump truck loads travel 3.5 round-trip miles per load. The site sends out 20 to 24 loads per day of mixer truck with ready-mixed concrete. These mixer truck loads travel 2 to 50 miles roundtrip per load; for the purpose of being reasonably conservative, a round-trip distance of 35 miles was applied in the air quality, GHG and related analyses. One trip per week for outbound waste headed to the landfill and one trip per week was assumed to be hauled offsite with recyclable materials.

Table 8 presents a summary of proposed Project employee trip activity levels. The currently employs up to 17 employees. The trips from these employees were estimated using the Sacramento County one way work trip length of 11.08 miles, based on the California Emission Estimator Model (CalEEMod) version 2022.1.29, Appendix C, Table C-3.1 (CAPCOA, 2022).

Table 7 – Round Trip Truck Travel Distances

Category	Inbound or Outbound	Trucks/Year	Trip Distance	VMT per Day	VMT per Year
Feedstock and Materials[1]	In	5,472	3.5	66.5	19,152
Supplies/Fuel	In	288	20	20.0	5,760
Customer Products[1]	Out	6,336	35	770.0	221,760
Waste to Landfill	Out	48	4	0.7	384
Waste to Recyclers	Out	48	4	0.7	384
Total		**12,192**		**857.8**	**247,440**

Note: 1) Trip distance described in Project Description

Table 8 – Employee Travel Distances

Daily Round Trips	One Way Trip[1] Length	Daily VMT	Days/Year	Annual VMT
17	11.08	377	312	**137,503**

Note: 1) The employee trip length is based on CalEEMod Version 2022.1.29 Appendix C, Table C-3.1 average home-based work trip lengths by California county (CAPCOA, 2022).

a) Impact Adequately Addressed in the Master EIR: The City of Sacramento General Plan, Part 2 Citywide Goals and Policies, Section 8 Mobility Element (City of Sacramento, 2024) aims to provide guidance to decisions that expand and improve the transportation system for local and regional trips, to accommodate the diverse transportation needs of the residents of the Planning Area and to specify the City's policies for coordination of transportation infrastructure planning with planning of public utilities and facilities.

WCO's Ready-Mix concrete batch plant is located at 8555 Morrison Creek Drive in the southeast area of the City within an IMU area within the General Plan. According to the Sacramento General Plan, Morrison Road connects to Florin-Perkins Road, a north south major arterial, which connects to SR-99 and other regional freeways from Elder Creek Road to the north and Florin Road to the south, major east-west regional arterial roadways (City of Sacramento, 2024).

The expected trip generation and VMT for trucks and employees are shown above in **Table 7** and **Table 8.** The City's VMT standard of significance would be based on the recommendations put forth by the State, as described in Technical Advisory on Evaluating Transportation Impacts in CEQA (State of California Governor's Office of Planning and Research (OPR), 2018). The Technical Advisory suggested that projects that generate or attract fewer than 110 passenger trips per day generally may be assumed to cause a less-than-significant transportation impact. As shown in **Table 8**, the proposed Project's daily passenger trip generation is well below the policy outlined in the Technical Advisory. As a result, the proposed Project would have a less than significant impact on the local and regional circulation system. The operation of the proposed Project would have no potential to impact alternative transportation plans, policies or programs. The Project operations in the long term would generate approximately 20 inbound truck trips from local quarries and 20 to 24 additional outbound trips mostly to infill, local and regional construction sites, which can be considered significant. The operation of the proposed Project would not create the need for any new public roads or alterations to any existing public roads. The Project area is located on Morrison Creek Drive, which is in an existing IMU area and is not served by a transit route. There may be cyclists or pedestrians along Morrison Creek Road, but given the industrial nature of the

area, those pedestrian and cycling activities would be intermittent and low volume. The Project itself does not include any offsite construction or other activities that would not conflict with programs, plans, ordinances or policies addressing the circulation system, including transit, roadways, bicycle or pedestrian systems. Given the Project would not modify existing roads, it would not create new hazards or barriers for pedestrian or bicycle use of this road. No potential exists to adversely impact any of the above alternative modes of transportation; as such, the proposed Project would generate no new impact with respect to this criteria. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

b) Impact Adequately Addressed in the Master EIR: As of July of 2020, all lead agencies were required to adopt VMT as the new measure for identifying transportation impacts for land use projects, replacing automobile delay–based level of service (LOS). To aid in this transition, the Governor's OPR released the 2018 Technical Advisory. The City of Sacramento allows use of the "Vehicle Miles Traveled (VMT) Guidelines." The VMT analysis utilizes the thresholds developed by OPR in December 2018 Technical Advisory for automobile VMT (i.e., light-duty vehicles). The Project would fall below threshold as described in Technical Advisory on Evaluating Transportation Impacts in CEQA (State of California Governor's Office of Planning and Research (OPR), 2018). The Technical Advisory suggested that projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact. The proposed Project's daily trip generation is well below the policy outlined in the Technical Advisory. As a result, the proposed Project would have a less than significant impact on the local and regional circulation system. The proposed Project is therefore under the threshold for daily vehicle trips generated, and is exempt from further VMT analysis. For these reasons, the proposed Project would result in no new transportation impacts under SB 743 (Steinberg, 2013).

Neither the Technical Advisory nor CEQA Guidelines Section 15064.3(a) directly address how to analyze transportation impacts associated with changes in traffic associated with goods movement, which is largely carried out by heavy-duty trucks. CEQA Guidelines Section 15064.3(a) specifies that the VMT to be analyzed is defined as the amount and distance of *automobile travel* (emphasis added) attributable to a Project. The term "automobile" refers to on-road *passenger vehicles, specifically cars and light trucks* (emphasis added) (State of California Governor's Office of Planning and Research (OPR), 2018). SB 743 does not require the inclusion of heavy-duty truck trips, utility vehicles, or other types of vehicles in the VMT analysis.[1] In the case of trucks (other than light trucks), based on CARB's 2017 Scoping Plan, the State's strategy for the goods movement sector is not via VMT reduction, but through advances in technology (zero-emissions [ZE] and near-zero emissions [NZE] control strategies) (CARB, 2017). Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

c) Impact Adequately Addressed in the Master EIR: As discussed above, the proposed Project would not require the construction of any additional offsite roads. Project access would be designed in accordance with all applicable design and safety standards required by adopted fire codes, safety codes, and building codes established by the City's Engineering and Fire Departments. New internal (onsite roads) within the proposed Project site would be designed and constructed in accordance with local and State building codes and policies. As the proposed Project would be designed to avoid impacting major roadways, site access has been designed such that the Project would not increase hazards due to a geometric design feature or incompatible uses, and as such construction traffic is not anticipated to result in any conflicts with the surrounding roadways. Additionally, the proposed Project would be required to comply with all applicable fire code and ordinance requirements for construction and access to the site. Emergency response and evacuation procedures would be coordinated with the City and the County, as well as the police and fire departments. In the long term, impacts to any hazards or incompatible uses in

existing or planned roadways would be less than significant. Operation of the proposed Project would be similar to the surrounding uses, and the design of the Project would not create any hazards to surrounding roadways. Thus, there would be no new impacts with respect to this criteria. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

d) Impact Adequately Addressed in the Master EIR: As discussed above, the proposed Project would be located within an IMU area with emergency access provided by Morrison Creek Road. The proposed Project would not require the construction of any additional offsite roads. As discussed in response to CEQA Checklist question XVII.c) above, Project access would be designed in accordance with all applicable design and safety standards required by adopted fire codes, safety codes, and building codes established by the City's Engineering and Fire Departments. New internal, onsite roads within the proposed Project site would be designed and constructed in accordance with local and State building codes and policies. Because the proposed Project would be located within an existing mixed-use industrial area, the proposed Project would not change existing offsite emergency access. No new points of public access are proposed. As such, emergency access to the site during operation would be maintained. Thus, while the proposed Project operations would include approximately 20 inbound and 24 outbound truck trips per day accessing the ready-mix cement facility, because the proposed Project would not change offsite emergency access, it would have no new impact on emergency access. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

Findings

The proposed Project would not have any significant effects relating to transportation that either have not already been analyzed in the Master EIR or that are more significant than previously analyzed.

Section XVIII. Tribal Cultural Resources

XVIII. TRIBAL CULTURAL RESOURCES Would the project:	**Significant Impact Peculiar to the Project or the Project Site**	**Significant Impact Due to New Information**	**Impact Adequately Addressed in the Master EIR**	**No Impact**
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	☐	☐	☒	☐
I. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☒	☐
II. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

Section 4.15 of the Master EIR and Section 6.4 of the 2040 General Plan Technical Background Report contain a detailed overview of the existing setting for the Planning Area as it relates to Tribal Cultural Resources (TCRs) (City of Sacramento, 2020). A Cultural Resources Technical Memorandum was also prepared for the Proposed Project which contains the results of a records search and literature review (Acorn Environmental, 2024). As indicated in the TBR, the Planning Area is located on the western edge of the Sacramento Valley which comprises roughly the northern third of an area that is called either Valle Grande, Great Valley, Central Valley, Great Central Valley, or California Trough. The major portion of the Planning Area lies in the territory attributed to the Nisenan tribe, a branch of the Maidu group of the Penutian language family. The southern portion of the Planning Area was occupied at the time of contact by the Plains Miwok. Surrounding indigenous communities, including the Patwin, Wintun, Yokut, and others, also have traditional cultural associations with the broader Sacramento Valley through trade and other precontract tribal relationships. Local tribes are living communities that remain deeply tied to their culture and their ancestral cultural sites and landscapes. While resource surveys since 1930 have recorded approximately 80 archaeological sites within the Planning Area including village sites, smaller occupation or special use sites, and lithic scatters, a large portion of the Planning Area has not been surveyed for archaeological resources. Additionally, archaeological sites do not necessarily represent TCRs, nor are all TCRs archaeological resources. As such, consultation with contemporary traditionally culturally affiliated

tribes is necessary for the identification and management of possible TCRs within the Planning Area (City of Sacramento, 2023).

The Master EIR evaluated the potential effects of development under the 2040 General Plan on TCRs (see Master EIR Chapter 4.15). Consistent with AB 52 and Senate Bill 18 requirements, the City engaged in consultation with two Native American tribes (UAIC and Wilton Rancheria) during preparation of the 2040 General Plan Master EIR. Future development projects for which the City prepares a mitigated negative declaration or environmental impact report would be subject to AB 52 consultation requirements that could lessen the potential for impacts through the identification of TCRs and potential solutions to avoid or otherwise leave such resources unmodified/unaltered (City of Sacramento, 2023).

2040 General Plan policies and implementing actions relevant to TCRs and the Proposed Project include:

- Policy HCR-1.6 Early Project Consultation. The City will continue to strive to minimize impacts to historic and cultural resources by consulting with property owners, land developers, tribal representatives, and the building industry early in the development review process, as needed.
- Policy HCR-1.14 Archaeological, Tribal, and Cultural Resources. The City shall continue to comply with federal and State regulations and best practices aimed at protecting and mitigating impacts to archaeological resources and the broader range of cultural resources, as well as tribal cultural resources.
- Policy HCR-1.17 Evaluation of Archeological Resources. The City shall work in good faith with interested communities to evaluate proposed development sites for the presence of sub-surface historic, archaeological, and tribal cultural resources that may be present at the site. These efforts may include the following:
    - Consideration of existing reports and studies,
    - Consultation with Native American tribes as required by State law,
    - Appropriate site-specific investigative actions, and
    - Onsite monitoring during excavation if appropriate.
- Implementing Action HCR-A.8 Conditions for Resource Discovery. The City shall establish and implement procedures for the protection of historic, archeological, and tribal cultural resources, consistent with the following:
    - In the event any materials, items, or artifacts are discovered during excavation at a project site that may have historic, archeological or tribal cultural resources, the project proponent and/or contractors should cease all work in the vicinity of the discovery, notify the City's Preservation Director or Manager of Environmental Planning Services, and coordinate with the City to determine the appropriate response, including further efforts for discovery and treatment of potential resources.
    - In the event any human remains are discovered during excavation, the project proponent and/or contractors shall comply with State law, including notifying the Sacramento County Coroner and following all procedures required by state law, including notifying the Native American Heritage Commission in the event the remains are determined to be Native American in origin.

The Master EIR concluded that future development that would occur under the 2040 General Plan could result in substantial adverse changes in the significance of a TCR (site, feature, place, cultural landscape, sacred place, or object) with cultural value to a California Native American tribe. Existing regulations and implementation of the 2040 General Plan would not ensure the protection of all TCRs including unanticipated TCRs that have yet to be identified, would not be known in advance, and could be discovered and/or destroyed during construction. Compliance with the legally required tribal notification and consultation requirements and 2040 General Plan policies along with the implementing action aimed at protecting TCRs would help reduce the significance of the impact. However, because

there is no feasible mitigation available to ensure damage or destruction of a TCR would not occur, the impact remains significant and unavoidable (City of Sacramento, 2023).

a) **Impact Adequately Addressed in the Master EIR:** On July 1, 2015, California AB 52 of 2014 went into effect, expanding CEQA by defining a new resource category, "tribal cultural resources." AB 52 states, "A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (Public Resources Code [PRC] Section 21084.2) (California Assembly, 2014). It further states the Lead Agency shall establish measures to avoid impacts altering the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3) (California Assembly, 2014).

AB 52 also establishes a formal consultation process for California tribes regarding tribal cultural resources. The consultation process must be completed before a CEQA document can be certified or adopted. Under AB 52, Lead Agencies (in this instance, the City of Sacramento) are required to "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." Native American tribes to be included in the process are those that have requested notice of projects proposed in the jurisdiction of the Lead Agency. Under AB 52, Native American tribes have 30 days to respond and request further project information.

i. **Impact Adequately Addressed in the Master EIR:** On December 12, 2024 notifications, pursuant to the requirements of PRC § 21080.3.1, were sent out to the tribes that are traditionally and culturally affiliated with the area that previously requested to receive such notification. One tribe responded with an email declining consultation on December 20, 2024. No other tribe requested consultation within 30 days of notification. Additionally, no significant ground-disturbing activities with the potential to uncover undiscovered tribal cultural resources would be required as a result of the Project. Therefore, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 21074 (California Assembly, 2014). Therefore, no new impacts would occur. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

ii. **Impact Adequately Addressed in the Master EIR:** The proposed Project would not cause a substantial adverse change in the significance of a tribal cultural resource. On December 12, 2024 notifications, pursuant to the requirements of PRC § 21080.3.1, were sent out to the tribes that are traditionally and culturally affiliated with the area that previously requested to receive such notification. One tribe responded with an email declining consultation on December 20, 2024. No other tribe requested consultation within 30 days of notification. Additionally, no significant ground-disturbing activities with the potential to uncover undiscovered tribal cultural resources would be required as a result of the Project. The entrance to the proposed Project site and the existing WCO light-industrial warehouse and associated foundations have previously been graded. Any additional ground-disturbing activities would have a small potential to uncover undiscovered tribal cultural resources because the site has been previously disturbed by historic industrial activities in the area. Therefore, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 5024.1 subdivision (c), and there would be no new impacts. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

Findings

The proposed Project would not have any significant effects relating to tribal and cultural resources that either have not already been analyzed in the Master EIR or that are more significant than previously analyzed.

Section XIX. Utilities and Service Systems

XIX. UTILITIES AND SERVICE SYSTEMS Would the project:	**Significant Impact Peculiar to the Project or the Project Site**	**Significant Impact Due to New Information**	**Impact Adequately Addressed in the Master EIR**	**No Impact**
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Utilities and service systems were discussed in the Master EIR in Chapters 4.12 and 4.13.

a) **Impact Adequately Addressed in the Master EIR:** As described in the Project Description above, the only municipal water usage and wastewater generation would occur from the light industrial building on the front parcel, which has previously been permitted and operating since 2021. The proposed Project would not change existing water and wastewater infrastructure at the existing office/storage building facility. All onsite stormwaters would be retained onsite, per the site NONA certification. Note that there was an existing detention basin constructed as part of the plans for the existing structure located at 8555 Morrison Creek Drive. The project will be responsible for reconstructing the detention basin per those approved plans.

As described in CEQA Checklist Section VI, Energy, the proposed Project would use 5,5000 kWh per month and 66,000 kWh per year for the ready-mix cement operation. WCO is in the process of establishing service with SMUD for utility service in the rear parcels; there is already utility service within the existing IMU area. The proposed Project would not use any natural gas as part of its operations. In addition, the Project would not pose substantial changes to telecommunications facilities.

Given the fact that water usage and wastewater discharges would not substantially change, stormwater would be retained onsite, telecommunications facilities would remain generally unaffected, there would be no gas service and SMUD already provides electrical service to the existing mixed-use industrial neighborhood, the Project's need for expanded utility services would create no new impact. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

b) **Impact Adequately Addressed in the Master EIR:** See response to CEQA Checklist question XIX.a) above. As described in the Project Description above, the only municipal water usage and wastewater generation would occur from the light industrial building on the front parcel, which has previously been permitted and operating since 2021. The proposed Project would not change existing water and wastewater infrastructure at the existing office/storage building facility. All onsite stormwaters would be retained onsite, per the site NONA certification. There is well water at the rear parcels for occasional use in onsite dust control. Therefore, the Project would have sufficient water supplies in the foreseeable future, and no new impacts would occur. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

c) **Impact Adequately Addressed in the Master EIR:** As described in the Project Description above, the only municipal water usage and wastewater generation would occur from the light industrial building on the front parcel, which has previously been permitted and operating since 2021. The proposed Project would not change existing water and wastewater infrastructure at the existing office/storage building facility. The Project would utilize existing onsite restrooms that are hooked up to the public sewer system or would have an onsite "porta potty." The Project would not substantially change existing wastewater flows from the site and, for this reason, would not exceed the City's wastewater capacity. Therefore, the Project would have no new impact on wastewater services. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

d) **Impact Adequately Addressed in the Master EIR:** The Project would generate minimal quantities of solid waste (i.e., food wrappers, debris, etc.). The quantity of solid waste generated onsite is anticipated to remain minimal and would be consistent with the quantity of solid waste and recyclables currently generated by the WCO site. Additionally, the Project site is serviced by the Sacramento County Republic Services, which has the Republic Services Elder Creek Transfer Station, less than 1 mile from the Project site. The Keifer Landfill is approximately 13 miles east of the site. Given the proposed Project would not substantially change the waste streams currently bound for landfill disposal, the landfill would be able to accommodate solid waste produced onsite adequately. For these reasons, the proposed operations would not substantially change existing solid waste infrastructure over the long term, and therefore, no new impact would occur. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

e) **Impact Adequately Addressed in the Master EIR:** The Project would generate minimal quantities of solid waste, such as food wrappers and rubbish, that is anticipated to remain consistent with the amount of solid waste currently generated at the Project site. Additionally, the proposed Project would not generate substantial construction activities given the site is developed and onsite stormwater retention and the site driveway would be the only structures with a potential need to rebuild for heavy truck activities. Any construction would be short-term (a few weeks at maximum) and conducted in compliance with local, state, and federal regulations. Given that WCO are a concreate ready-mix

operation, they have the equipment and expertise to provide these remaining onsite improvements. The construction would not result in a significant amount of solid waste, and any solid waste generated during construction would be managed according to state and local requirements and properly disposed of offsite. For these reasons, the Project would comply with federal, state, and local solid waste statutes and regulations, and no new impact would occur. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

Findings

The proposed Project would not have any significant effects relating to utilities and service systems that either have not already been analyzed in the Master EIR or that are more significant than previously analyzed.

Section XX. Wildfire

XX. WILDFIRE If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	**Significant Impact Peculiar to the Project or the Project Site**	**Significant Impact Due to New Information**	**Impact Adequately Addressed in the Master EIR**	**No Impact**
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or 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 slope instability, or drainage changes?	☐	☐	☐	☒

The Master EIR does not identify any significant impacts related to wildfire risk. According to the California Department of Forestry and Fire Protection (CAL FIRE) Fire and Resources Assessment Program (FRAP), the City of Sacramento is located within a Local Responsibility Area (LRA). The City is not located within or adjacent to a State Responsibility Area (SRA) or a designated Very High Fire Hazard Severity Zone (VHFHSZ).

a. Impact Adequately Addressed in the Master EIR: The Project site is not located within or near a SRA or lands considered very high FHSZ based on the Cal Fire FHSZ viewer (California Department of Forestry and Fire Protection (CalFire), 2025). The nearest FHSZ is located over 11.9 miles east of the Project site. Additionally, WCO would maintain an HMBP that includes the emergency response plan for the site. The proposed Project would continue to generate a relatively small amount of traffic for a total of 61 roundtrips per day (17 employee roundtrips, 20 dump truck roundtrips, and 20-24 mixer truck roundtrips). This amount of traffic would continue not to impair an adopted emergency response or evacuation plan. For these reasons, the Project would have no new impact associated with the impairment of an adopted emergency response plan or emergency evacuation plan. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

b. Impact Adequately Addressed in the Master EIR: As discussed in response to CEQA Checklist question XX.a) above, the Project site is located outside of the SRA and is approximately 11.9 miles west from the nearest very high FHSZ. Additionally, the Project site is located entirely within the existing WCO concrete batch plant boundary, which is already disturbed and devoid of vegetation. As such, the Project

site would continue to primarily consist of barren soil, which would serve as a fire break during the unlikely occurrence of a fire onsite. Further, the Project would include the construction of stormwater containment infrastructure (i.e., earthen berms, concrete block walls and berms, and a retention basin), which would also serve as a fire break.

Further, WCO would continue implementing a HMBP that includes the site's emergency response and fire management plans. WCO would also continue to store all hazardous materials in accordance with the material's SDS to reduce fire risk. Therefore, the likelihood of a fire occurring due to the materials stored onsite is minimal and managed by the HMBP since the material would be maintained per the guidelines outlined in the SDS. Based on this, and since the Project site would serve as a natural fire break, there would be no new impacts related to slope, prevailing winds, and other factors that exacerbate wildfire risks and/or exposure of Project occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire would result. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

c. No Impact: The Project would not 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. As discussed above, the proposed Project would develop a WCO concrete batch plant within a 5.32-acre developed and highly disturbed industrial property. Further, the Project would not change existing public roadways or other infrastructure, such as emergency water sources, power lines, or other utilities. Specifically, the Project would only include the installation of stormwater containment infrastructure, including earthen berms, concrete block walls and berms, and a retention basin. However, this infrastructure would act as a natural fire break in the unlikely occurrence of a fire onsite. Therefore, there would be no impact that may exacerbate fire risk or result in temporary or ongoing environmental impacts. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

d. No Impact: Please see response to CEQA Checklist questions XX.a) through XX.c) above. The Project site is not located within or near a very high FHSZ. Additionally, the Project would occur on relatively flat topography, which would not be modified as part of the proposed operations. The Project would only include the temporary placement of aggregate stockpiles while materials are waiting to be processed in the proposed WCO concrete plant. Due to the temporary nature of the stockpiles, and since the site's overall topography would not change, the Project would not construct new slopes that could potentially present a risk to onsite employees or neighboring properties due to instability or changes in drainage/runoff resulting from a wildfire. Therefore, the Project would result in no impacts associated with the exposure of people or structures to significant risks, including downslope or downstream flooding or landslides, due to runoff, post-fire slope instability, or drainage changes. Based on the above, the proposed Project would not result in any peculiar effects that would require further CEQA review and impacts were adequately addressed in the Master EIR.

Findings

The proposed Project would not have any significant effects relating to wildfire that either have not already been analyzed in the master EIR or that are more significant than previously analyzed. Therefore, impacts related to wildfire were adequately addressed in the Master EIR.

Section XXI. Mandatory Findings of Significance

XXI. MANDATORY FINDINGS OF SIGNIFICANCE	Significant Impact Peculiar to the Project or the Project Site	Significant Impact Due to New Information	Impact Adequately Addressed in the Master EIR	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☐	☒
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

a) **No Impact:** As detailed in CEQA Checklist Section IV above, the Project would have less than significant to no impacts on biological resources. The Project would not have a substantial adverse effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations or by CDFW or USFWS. In addition, the Project would operate its ready-mix operation entirely within a previously disturbed and graded 5.3-acre portion of the parcels described in the Project Description. As such, the Project would not have the potential to substantially degrade the quality of the environment, reduce the habitat of a fish or wildlife species or cause a population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce or restrict the number and range of rare and endangered plants and animals, or eliminate important examples of the major periods of California history or prehistory. Therefore, no impact would occur. Impacts associated with such resources have been adequately addressed in the Master EIR and would not change from what was identified in the Master EIR, and the criteria for requiring further CEQA review are not met.

b) **Impact Adequately Addressed in the Master EIR:** The Project, as documented in the responses to all of the CEQA Checklist Sections above, would have either no impact or less than significant impacts. The Project's incremental contribution is either small or temporary for all the resource areas. For these reasons, the Project's incremental contribution would not be cumulatively considerable, and there would be less than significant impacts. EIR. Furthermore, as discussed throughout this Modified Initial Study/15183 Checklist, all impacts associated with the proposed Project were adequately addressed in the Master EIR, and the Proposed Project would not result in any peculiar effects that would require further CEQA review. As such, this Modified Initial Study/15183 Checklist does not include any substantial

new information that shows impacts are more severe than previously discussed, and further analysis is not required.

c) **Impact Adequately Addressed in the Master EIR:** As described in this Modified Initial Study/15183 Checklist, the proposed Project would comply with all applicable 2040 General Plan policies, City Code, and other applicable federal, State regulations and local regulations. In addition, as discussed in the Air Quality, Geology and Soils, Hazards, and Noise sections of this Modified Initial Study/15183 Checklist, the proposed Project would not cause substantial effects to human beings, including effects related to exposure to air pollutants, geologic hazards, hazardous materials, and excessive noise, beyond the effects previously analyzed as part of the Master EIR. Therefore, further analysis is not required in this Modified Initial Study/15183 Checklist.

Note: Authority cited: Sections 21083 and 21083.05, 21083.09 Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21073, 21074 21080(c), 21080.1, 21080.3, 21083, 21083.05, 21083.3, 21080.3.1, 21080.3.2,21082.3, 21084.2, 21084.3, 21093, 21094, 21095, and 21151, Public Resources Code; Sundstrom v. County of Mendocino,(1988) 202 Cal.App.3d 296; Leonoff v. Monterey Board of Supervisors, (1990) 222 Cal.App.3d 1337; Eureka Citizens for Responsible Govt. v. City of Eureka (2007) 147 Cal.App.4th 357; Protect the Historic Amador Waterways v. Amador Water Agency (2004) 116 Cal.App.4th at 1109; San Franciscans Upholding the Downtown Plan v. City and County of San Francisco (2002) 102 Cal.App.4th 656.

Acronyms

ACRONYM	DEFINITION
AB	Assembly Bill
AFY	Acre-feet per year
APN	Assessor's Parcel Number
AQAP	Air Quality Attainment Plan
BMP	Best Management Practice
CAAP	Climate Action and Adaptation Plan
CADF	State of California Department of Finance
Cal Fire	California Department of Forestry and Fire Protection
CalEEMod	California Emission Estimator Model
Caltrans	California Department of Transportation
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CCAA	California Clean Air Act
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CH4	Methane
CO2	Carbon dioxide
CO2e	Carbon dioxide equivalent
CUPA	Certified Unified Program Agency
DOC	California Department of Conservation
DTSC	Department of Toxic Substances Control
EMFAC	Emission Factor estimator model
EPA	U.S. Environmental Protection Agency
FEMA	Federal Emergency Management Agency
FHSZ	Fire hazard severity zone
FMMP	Farmland Mapping and Monitoring Program
GHG	Greenhouse gas
GSA	Groundwater Sustainability Agency
HMBP	Hazardous Materials Business Plan
IGP	Industrial General Permit
IMU	Industrial Mixed Use
kWh	Kilowatt hours
LCFS	Low Carbon Fuel Standard
LEA	Local Enforcement Agency
LOS	Level of service
MSDS	Material Safety Data Sheet
MT	Metric tons
N/A	Not Applicable
N2O	Nitrogen dioxide
NFHL	National Flood Hazard Layer
NONA	Notice of Non Applicability
NOx	Nitrogen oxides
NPDES	National Pollution Discharge Elimination System

NZE	Near-zero emissions
OPR	Office of Planning and Research
PM10	Particulate matter with a diameter of 10 micrometers (µm) or less
PM2.5	Fine particulate matter with a diameter of 10 micrometers (µm) or less
ppd	Pounds Per Day
PRC	Public Resources Code
ROG	Reactive organic gasses
SB	Senate Bill
SDS	Safety Data Sheet
SGMA	Sustainable Groundwater Management Act
SIP	State Implementation Plan
SMAQMD	Sacramento Metropolitan Air Quality Management District
SMUD	Sacramento Municipal Utility District
SPCC	Spill Prevention, Control, and Countermeasure
SPR	Site Plan Review
SQIP	Stormwater Quality Improvement Program
SR	State Route
SRA	State Responsibility Area
SWPPP	Stormwater Pollution Prevention Plan
tpy	Tons Per Year
USFWS	U.S. Fish and Wildlife Service
VMT	Vehicle miles traveled
WCO	West Coast Outlaws, Inc.
WWTP	Wastewater Treatment Plan
ZE	Zero emissions
ZEV	Zero-emission vehicle

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ATTACHMENT A

Air Quality Operational Emission Estimates

Category	VOC	NOx	CO	SOx	PM10	PM2.5
	Tons/Year					
Inbound Trucks	0.0004	0.042	0.003	0.000	0.001	0.000
Outbound Trucks	0.0022	0.248	0.013	0.004	0.004	0.003
Employee Trips	0.0096	0.052	0.132	0.000	0.007	0.006
Total Mobile Emissions	**0.012**	**0.342**	**0.148**	**0.005**	**0.011**	**0.010**
Engine	**0.062**	**1.184**	**1.091**	**0.002**	**0.062**	**0.062**
Electricity						
Process Emissions					**1.140**	**1.140**
Total Emissions (tpy)	**0.07**	**1.53**	**1.24**	**0.01**	**1.21**	**1.21**
SMAQMD Thresholds (TPY)	**N/A**	**N/A**	**N/A**	**N/A**	**14.6**	**15.0**
Exceeds Annual Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**

Category	VOC	NOx	CO	SOx	PM10	PM2.5
	lb/day					
Inbound Trucks	0.0030	0.295	0.018	0.003	0.004	0.003
Outbound Trucks	0.0154	1.719	0.093	0.026	0.025	0.024

Category	CO2	CH4	N2O	CO2e
	MT/year			
Inbound Trucks	41.63	0.00002	0.01	43.59
Outbound Trucks	364.41	0.00009	0.06	381.52
Employee Trips	44.39	0.001	0.004	45.58
Total Mobile Emissions	**450.44**	**0.001**	**0.07**	**470.69**
Engine	196.25	0.01	0.002	**196.90**
Electricity				**7.78**
Process Emissions				
Total Emissions with Engine (tpy)				**667.59**
Total Emissions without Engine (tpy)				**478.47**

Mobile Sources

Total Mobile Emissions

Category	VOC	NOx	CO	SOx	PM10	PM2.5	CO2	CH4	N2O	CO2e
	tons/year						MT/year			
Inbound Trucks	0.0004	0.0424	0.0026	0.0004	0.0005	0.0005	41.63	0.0000	0.0066	43.59
Outbound Trucks	0.0022	0.2476	0.0134	0.0038	0.0036	0.0035	364.41	0.0001	0.0574	381.52
Employee Trips	0.0096	0.0522	0.1322	0.0005	0.0066	0.0063	44.39	0.0006	0.0039	45.58
Total Mobile	**0.0122**	**0.3422**	**0.1482**	**0.0047**	**0.0108**	**0.0103**	**450.44**	**0.0007**	**0.068**	**470.69**

Inbound Trucks

Material	Days per Year	Trips per Year	Distance (miles)	Daily Vehicle Miles Traveled	Annual Vehicle Miles Traveled
Feedstock and Materials	288	5,472	3.5	67	19,152
Supplies/Fuel	288	288	20	20	5,760

Category	VOC	NOx	CO	SOx	PM10	PM2.5	CO2	CH4	N2O	CO2e
Emission Factor (g/mile)	1.56E-02	1.54E+00	9.47E-02	1.58E-02	1.87E-02	1.79E-02	1.67E+03	7.25E-04	2.63E-01	
Emission Factor (lb/mile)	3.44E-05	3.40E-03	2.09E-04	3.49E-05	4.12E-05	3.94E-05				
Daily Emissions (lb/day)	2.98E-03	2.95E-01	1.81E-02	3.02E-03	3.57E-03	3.41E-03	3.19E+02	1.38E-04	5.02E-02	
Annual Emissions (tons/year)	0.0004	0.04	0.00	0.000	0.001	0.000				
Annual Emissions (MT/year)							41.63	1.81E-05	0.01	43.59

Outbound Trucks

Material	Days per Year	Trips per Year	Distance (miles)	Daily Vehicle Miles Traveled	Annual Vehicle Miles Traveled
Customer Products	288	6,336	35	770	221,760
Waste to Landfill	288	48	4	0.7	192
Recycling	288	48	4	0.7	192

Category	VOC	NOx	CO	SOx	PM10	PM2.5	CO2	CH4	N2O	CO2e
Emission Factor (g/mile)	9.07E-03	1.01E+00	5.45E-02	1.55E-02	1.48E-02	1.42E-02	1.64E+03	4.21E-04	2.58E-01	
Emission Factor (lb/mile)	2.00E-05	2.23E-03	1.20E-04	3.42E-05	3.26E-05	3.12E-05				

Daily Emissions (lb/day)	1.54E-02	1.72E+00	9.27E-02	2.64E-02	2.52E-02	2.41E-02	2.79E+03	7.17E-04	4.39E-01	
Annual Emissions (tons/year)	0.002	0.25	0.01	0.004	0.004	0.003				
Annual Emissions (MT/year)							364.41	9.36E-05	0.06	381.52

Employees

Category	Days per Year	Trips per Year	Distance (miles)	Daily Vehicle Miles Traveled	Annual Vehicle Miles Traveled
Employee Trips	365	17	11.08	376.72	137,503

Category	VOC	NOx	CO	SOx	PM10	PM2.5	CO2	CH4	N2O	CO2e
Emission Factor (g/mile)[1]	6.32E-02	3.44E-01	8.72E-01	3.13E-03	4.37E-02	4.18E-02	3.23E+02	4.44E-03	2.86E-02	
Emission Factor (lb/mile)	1.39E-04	7.59E-04	1.92E-03	6.89E-06	9.64E-05	9.21E-05				
Daily Emissions (lb/day)	5.25E-02	2.86E-01	7.24E-01	2.60E-03	3.63E-02	3.47E-02	2.68E+02	3.69E-03	2.38E-02	
Annual Emissions (tons/year)	0.010	0.05	0.13	0.000	0.007	0.006				
Annual Emissions (MT/year)							44.39	6.11E-04	0.004	45.58

1. Average of EMFAC2021 LDA, LDT1, and LDT2 gasoline and diesel emission factors for 2025 calendar year, Sacramento County.

Mobile Trips

Truck Trip Data

Category	Inbound or Outbound	Trucks/ Day	Days/ Year[2]	Trucks/ Year	Round Trip Distance	Vehicle Miles Traveled Daily	Vehicle Miles Traveled Annual
Feedstock and Materials[1]	In	19	288	5,472	3.5	66.5	19,152
Supplies/Fuel	In	1	288	288	20	20.0	5,760
Customer Products[1]	Out	22	288	6,336	35	770.0	221,760
Waste to Landfill	Out	0.17	288	48	4	0.7	384
Waste to Recyclers	Out	0.17	288	48	4	0.7	384
Total		**42.3**		**12,192**		**857.8**	**247,440**

1. Number of trips and trip distance from Initial Study Project Description.
2. Days of operation from AQ Application draft submittal.

Employees

Daily Round Trips[1]	One Way Trip Length[2]	Daily VMT	Days/ Year	Annual VMT
17	11.08	377	365	137,503

1. Number of full-time employees from Initial Study Project Description.
2. CalEEMod App C, Table C-3.1, Average Home-Based-Work Trip Length by California County, Sacramento County = 11.08

Source: EMFAC2021 (v1.0.2) Emission Rates
Region Type: County
Region: Sacramento
Calendar Year: 2025
Season: Annual
Vehicle Classification: EMFAC202x Categories
Units: miles/day for CVMT and EVMT, trips/day for Trips, g/mile for RUNEX, PMBW and PMTW, g/trip for STREX, HOTSOAK and RUNLOSS, g/vehic

Region	Calendar Y	Vehicle Category	Model Yea	Speed	Fuel	Population	Total VMT	CVMT	EVMT	Trips	NOx_RUNEX
Sacrament	2025	LDA	Aggregate	Aggregate	Gasoline	491398.3	18017007	18017007	0	2259540	0.040979036
Sacrament	2025	LDA	Aggregate	Aggregate	Diesel	1553.179	41591.19	41591.19	0	6423.396	0.216041008
Sacrament	2025	LDT1	Aggregate	Aggregate	Gasoline	48785.94	1547598	1547598	0	212712.2	0.116824876
Sacrament	2025	LDT1	Aggregate	Aggregate	Diesel	18.32966	167.4891	167.4891	0	51.70598	1.582553122
Sacrament	2025	LDT2	Aggregate	Aggregate	Gasoline	237055.1	8875175	8875175	0	1098484	0.061796389
Sacrament	2025	LDT2	Aggregate	Aggregate	Diesel	742.8591	29745.88	29745.88	0	3530.433	0.046756853
Sacrament	2025	T7 CAIRP Class 8	Aggregate	Aggregate	Diesel	929.9493	188598	188598	0	21370.23	1.482816717
Sacrament	2025	T7 Single Other Class 8	Aggregate	Aggregate	Diesel	1377.584	76100.92	76100.92	0	12976.85	1.22974294
Sacrament	2025	T7 Utility Class 8	Aggregate	Aggregate	Diesel	29.57644	1313.929	1313.929	0	378.5784	1.286819495
Sacrament	2025	T7 Single Concrete/Trans	Aggregate	Aggregate	Diesel	169.2621	11773.93	11773.93	0	1594.449	1.011071194
Sacrament	2025	T7 Single Dump Class 8	Aggregate	Aggregate	Diesel	507.6724	29349.35	29349.35	0	4782.274	1.544346223
Sacrament	2025	T7 Single Other Class 8	Aggregate	Aggregate	Diesel	1377.584	76100.92	76100.92	0	12976.85	1.22974294
						2337.11	266012.8				

le/day for IDLEX and DIURN. PHEV calculated based on total VMT.

NOx_IDLEX	NOx_STREX	PM2.5_RU	PM2.5_IDI	PM2.5_STI	PM2.5_PM	PM2.5_PM	PM10_RUI	PM10_IDL	PM10_STR	PM10_PM	PM10_PMI	CO2_RUNI
0	0.257886953	0.00124	0	0.001964	0.002	0.002773	0.001348	0	0.002136	0.008	0.007923	283.2589
0	0	0.013431	0	0	0.002	0.002829	0.014038	0	0	0.008	0.008084	234.5259
0	0.410756235	0.001735	0	0.002779	0.002	0.003423	0.001887	0	0.003023	0.008	0.009779	337.8271
0	0	0.228399	0	0	0.002	0.003877	0.238727	0	0	0.008	0.011076	426.9906
0	0.334728279	0.001266	0	0.001918	0.002	0.003293	0.001377	0	0.002086	0.008	0.009408	347.803
0	0	0.004716	0	0	0.002	0.003252	0.00493	0	0	0.008	0.00929	306.6242
115.1951641	2.222870421	0.03031	0.042485	0	0.009	0.025998	0.03168	0.044406	0	0.036	0.074281	1518.199
21.65448104	3.288080182	0.015659	0.012868	0	0.009	0.028146	0.016367	0.01345	0	0.036	0.080418	1640.81
7.387657585	4.975077234	0.006881	0.002587	0	0.009	0.032945	0.007192	0.002704	0	0.036	0.094129	1703.947
20.95870116	3.496624872	0.014155	0.008306	0	0.009	0.028161	0.014795	0.008681	0	0.036	0.080459	1640.423
21.74881662	3.055191074	0.017887	0.016092	0	0.009	0.028155	0.018696	0.01682	0	0.036	0.080442	1671.241
21.65448104	3.288080182	0.015659	0.012868	0	0.009	0.028146	0.016367	0.01345	0	0.036	0.080418	1640.81

CO2_IDLE	CO2_STRE	CH4_RUNI	CH4_IDLE	CH4_STRE	N2O_RUN	N2O_IDLE	N2O_STRE	ROG_RUN	ROG_IDLE	ROG_STRI	ROG_HOT	ROG_RUN	ROG_DIUF
0	69.59705	0.002396	0	0.071138	0.004623	0	0.032857	0.009112	0	0.329828	0.100907	0.265205	1.693451
0	0	0.001211	0	0	0.03695	0	0	0.026077	0	0	0	0	0
0	87.36159	0.006048	0	0.111127	0.00893	0	0.039943	0.026843	0	0.584404	0.191626	0.554808	3.277501
0	0	0.013531	0	0	0.067273	0	0	0.29132	0	0	0	0	0
0	86.60903	0.002757	0	0.081514	0.005647	0	0.037171	0.010537	0	0.377465	0.089753	0.251196	1.625795
0	0	0.000714	0	0	0.048309	0	0	0.015374	0	0	0	0	0
23726.49	0	0.000577	0.484628	0	0.239193	3.738118	0	0.012423	10.43391	0	0	0	0
4437.828	0	0.000545	0.087118	0	0.25851	0.699182	0	0.011744	1.875619	0	0	0	0
1578.977	0	0.000587	0.029512	0	0.268458	0.248768	0	0.012639	0.635394	0	0	0	0
4305.841	0	0.000421	0.086543	0	0.258449	0.678387	0	0.009074	1.863243	0	0	0	0
4656.861	0	0.000725	0.087474	0	0.263305	0.73369	0	0.015609	1.883295	0	0	0	0
4437.828	0	0.000545	0.087118	0	0.25851	0.699182	0	0.011744	1.875619	0	0	0	0

TOG_RUN	TOG_IDLE	TOG_STRE	TOG_HOT	TOG_RUN	TOG_DIUF	NH3_RUNI	CO_RUNE	CO_IDLEX	CO_STRE	SOx_RUNI	SOx_IDLE	SOx_STRE
0.013296	0	0.36112	0.100907	0.265205	1.693451	0.035127	0.798549	0	3.24507	0.0028	0	0.000688
0.029686	0	0	0	0	0	0.0031	0.362243	0	0	0.002222	0	0
0.03917	0	0.639849	0.191626	0.554808	3.277501	0.035888	1.471163	0	5.567377	0.00334	0	0.000864
0.331649	0	0	0	0	0	0.0031	1.565215	0	0	0.004046	0	0
0.015376	0	0.413276	0.089753	0.251196	1.625795	0.036522	0.881031	0	3.592322	0.003438	0	0.000856
0.017503	0	0	0	0	0	0.0031	0.15532	0	0	0.002905	0	0
0.014142	11.87822	0	0	0	0	0.22	0.052843	153.9858	0	0.014376	0.224676	0
0.01337	2.13525	0	0	0	0	0.219906	0.07127	27.18897	0	0.015537	0.042024	0
0.014389	0.723348	0	0	0	0	0.22	0.130419	9.368871	0	0.016135	0.014952	0
0.01033	2.121161	0	0	0	0	0.219984	0.05454	27.45985	0	0.015534	0.040774	0
0.01777	2.143988	0	0	0	0	0.219858	0.094736	26.9262	0	0.015826	0.044098	0
0.01337	2.13525	0	0	0	0	0.219906	0.07127	27.18897	0	0.015537	0.042024	0

Electricity

Electricity Consumption	Annual Consumption [1]	EF[2]	Emissions	
	kWh	lb/MWh	tpy	MT/yr
CO2e	66,000	260	8.58	**7.78**

[1] Annual consumption from Project Description.

[2] SMUD (Sacramento Municipal Utility District) 2023 Power Content Label. https://www.smud.org/PCL

ENGINE

Engine Emissions Summary

Engine Specification[1]							Pollutant										
Engine Make	Engine Model	Engine Rating (Electrical, kW)	Engine Rating (Mechanical, kW)	Operating Hours/ Day	Operating Hours/ Year	Units	NO_X	CO	PM	PM_{10}	$PM_{2.5}$	SO_2	VOC	CO_2	CH_4	N_2O	GHG (CO_2e)
Cummins	QSB7-G3	120	151	6.5	1,872	ppd	8.22	7.57	0.43	0.43	0.43	0.016	0.43	1,502	0.06	0.01	1,507.27
						TPY	1.18	1.09	0.06	0.06	0.06	0.002	0.06	216.33	0.01	0.002	217.05

1. Based on the engine specification sheets provided by Sarah Kelly in an email dated March 5, 2025.
2. Average brake specific fuel consum 7,000 Btu/hp-hr, Per AP-42 Chapter 3.3, is used to convert from lb/MMBtu to lb/hp-hr for diesel generators and
   1.34 hp/kW
3. Global Warming Potentials (GWP) for CH4 and N2O are from IPCC Sixth Assessment Report, 2021 (AR6).

nission Fact

Pollutant	EF	Unit	Note
NOx	3.80	g/kW-hr	1,2
CO	3.50	g/kW-hr	1
PM	0.20	g/kW-hr	1
PM_{10}	0.20	g/kW-hr	1
$PM_{2.5}$	0.20	g/kW-hr	1
VOC	0.20	g/kW-hr	1,2
SO_x	1.21E-05	lb/hp-hr	3
CO_2	7.40E+01	kg/MMBtu	4
CH_4	3.00E-03	kg/MMBtu	5
N_2O	6.00E-04	kg/MMBtu	5

1. From "Nonroad Compression-Ignition Engines: Exhaust Emission Standards" (EPA, 2016) for Tier 3 engines with 130 ≤ kW < 225.
2. BAAQMD Guidance - https://www.baaqmd.gov/~/media/Files/Engineering/policy_and_procedures/Engines/EmissionFactorsforDieselEngines.ashx
3. AP-42, Table 3.4-1 (October 1996) based on Ultra Low Sulfur Diesel (15 ppm sulfur or 0.0015%)
4. 40 CFR Part 98, Subpart C, Table C-1 for Distillate Fuel Oil No. 2 (diesel)
5. 40 CFR Part 98, Subpart C, Table C-2 for Petroleum Products (All fuel types in Table C-1)

Concrete Batch Plant

Operating Schedule[1]	hr/day	day/week	week/yr
	8	6	48
Loads per day[2]	22		

1. Operating schedule from AQ Application draft submittal.
2. Load per day from Project Description.

Specifications	ound per batch[1]
Aggregate	18,000
Sand	15,000
Cement	5,600

1. Specifications from AQ Application draft submittal.

Operation	Equipment	Activity	Material	Maximum Rates Capacity [1] (tpy)	Emission Factors [2]		
					PM	$PM_{10}/PM_{2.5}$	Units
Concrete Batch Plant	Aggregate delivery to ground storage	Unloading of Aggregate Material	Aggregate	57,024	0.0069	0.0033	lb/ton
	Sand delivery to ground storage	Unloading of Sand	Sand	47,520	0.0021	0.00099	lb/ton
	Aggregate transfer to conveyor	Transferring aggregate material	Aggregate	57,024	0.0069	0.0033	lb/ton
	Sand transfer to conveyor	Transferring Sand	Sand	47,520	0.0021	0.00099	lb/ton
	Aggregate transfer to elevated storage	Transferring aggregate material	Aggregate	57,024	0.0069	0.0033	lb/ton
	Sand transfer to elevated storage	Transferring Sand	Sand	47,520	0.0021	0.00099	lb/ton
	Cement delivery to silo	Unloading of Cement	Cement	7,200	0.00099	0.00034	lb/ton
	Cement supplement delivery to silo	Unloading of Cement Supplement	Cement	7,200	0.0089	0.0049	lb/ton
	Weigh hopper loading	Loading of Weigh hopper	Concrete	122,285	0.0048	0.0028	lb/ton
	Central mix loading	Loading of Mixer	Concrete	122,285	0.0184	0.0055	lb/ton

1. Throughputs from AQ Application draft submittal.
2. EPA AP-42 Section 11.12, Table 11.12-2. emission factors were utilized. If a controlled emission factor was unavailable, an uncontrolled emission factor was used.

Equipment	Flow Rate (cfm)	Max Outlet Grain	Operating Hours/	Operating Hours/Year
Reverse Air Dust Collector RA-5	6,500	0.005	6.5	1,872

Operation	Activity	Annual Emissions (tpy)			Daily Emissions (lb/day)			Hourly Emissions (lb/hr)		
		PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	$PM_{2.5}$	PM	PM_{10}	$PM_{2.5}$
Concrete Batch Plant	Unloading of Aggregate Material	0.20	0.09	0.09	1.08	0.52	0.52	0.04	0.02	0.02
	Unloading of Sand	0.05	0.02	0.02	0.27	0.13	0.13	0.01	0.01	0.01
	Transferring aggregate material	0.20	0.09	0.09	1.08	0.52	0.52	0.04	0.02	0.02
	Transferring Sand	0.05	0.02	0.02	0.27	0.13	0.13	0.01	0.01	0.01
	Transferring aggregate material	0.20	0.09	0.09	1.08	0.52	0.52	0.04	0.02	0.02
	Transferring Sand	0.05	0.02	0.02	0.27	0.13	0.13	0.01	0.01	0.01
	Unloading of Cement	0.00	0.00	0.00	0.02	0.01	0.01	0.00	0.00	0.00
	Unloading of Cement Supplement	0.03	0.02	0.02	0.18	0.10	0.10	0.01	0.00	0.00
	Loading of Weigh hopper	0.29	0.17	0.17	1.61	0.94	0.94	0.07	0.04	0.04
	Loading of Mixer	1.13	0.34	0.34	6.16	1.84	1.84	0.26	0.08	0.08
	Baghouse[1,2]	0.26	0.26	0.26	1.81	1.81	1.81	0.28	0.28	0.28
Total:		**2.45**	**1.14**	**1.14**	**13.83**	**6.63**	**6.63**	**0.78**	**0.48**	**0.48**

1. Using the conversion factors given below:

7000	grains/lb
2000	lb/ton
60	min/hr

2. https://www.epa.gov/sites/default/files/2020-10/documents/b11s12_0.pdf, Section 4.3

ATTACHMENT B

Energy Fuel Estimates

Fuel Consumption			
ENGINE	**Cummins**		
Model	QSB7-G3		
HP	202.49	137,381	BTU/gal
Gal/HR	10.32	1,417,460	BTU/hr
Hours/day	6.5		
Gal/day	67.07		
Days per year	288		
Gal/yr	19,315		

Source	VMT/Year	MPG	Gallons/YR
Trucks[1]	247,440	3.2	77,325.00
Passenger Vehicles[2]	137,503	24.6	5,589.54
Engine			19,315
Total			**102,229**

1. https://www.prettymotors.com/how-many-mpg-does-a-dump-truck-get/
2. Light duty vehicles short wheelbase (2020) https://www.fhwa.dot.gov/policyinformation/statistics/2020/vm1.cfm