



ENVIRONMENTAL CHECKLIST

FOR THE

ORLAND ANNEXATION PROJECT

FEBRUARY 2026

Prepared for:

City of Orland
815 Fourth Street
Orland, CA 95963

Prepared by:

De Novo Planning Group
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El Dorado Hills, CA 95762
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D e N o v o P l a n n i n g G r o u p

A Land Use Planning, Design, and Environmental Firm



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INTRODUCTION

The following pages provide an analysis of the proposed Orland Annexation Project (project) with respect to the project's consistency with the City of Orland General Plan, the analysis contained in the Orland General Plan Environmental Impact Report (EIR), and any site-specific environmental impacts or cumulative impacts that may result from project implementation.

As explained in the following pages, the proposed project is consistent with the City's General Plan, for which an EIR was prepared and certified, and there are no site-specific or cumulative impacts associated with the proposed project that have not been fully addressed in a previous environmental document, or that cannot be mitigated to a less-than-significant level through the application of uniformly applied development policies and/or standards. The findings presented below demonstrate that no additional environmental analysis is required under the California Environmental Quality Act (CEQA) prior to approval of the proposed project.

PROJECT OVERVIEW

PROJECT LOCATION

The project parcels are located just west of the existing city limits of the City of Orland. The site is within the City's Sphere of Influence (SOI), and is within the City's Planning Area. **Figure 1** shows the regional map, and **Figure 2** shows the vicinity map for the project.

PROJECT DESCRIPTION

The proposed Project includes a request for annexation of approximately 37 acres located within the southwest portion of the City of Orland SOI and the City's Planning Area. Approval of a site plan is not being requested by the applicant at this time, as all site plans and specific development proposals are still conceptual. There are no entitlements or specific development approvals being requested beyond the annexation, and rezoning, which is described below.

For the purposes of this analysis, it is assumed that any future development application on the subject project site(s) would develop the project site with commercial uses, consistent with the intended rezoning of Highway Service Commercial (C-H).

The C-H zone is intended to provide necessary services and convenience for the traveling public along main roads or at highway intersection frontages at proper intervals and locations in developments designed for safety, convenience and suitable appearance.

EXISTING SITE USES

The project site currently contains agricultural land (pasture land), as well as some existing agricultural and residential buildings located in the northeastern portion of Project site. There are a small number of scattered trees located primarily within the northeastern portion of the Project site.

SURROUNDING LAND USES

The project site is located in a rural area that includes agricultural, commercial, light industrial, and rural residential uses. The surrounding area adjacent to the project site includes agricultural

uses to the east, west, and south; rural residential uses to the north, east, and south; some commercial uses are located to the east of the Project site (i.e. the Orland Inn and the K&M Thai Noodle House). Orland Estates, a mobile home park, is located south of the Project site. Additionally, Interstate 5 (I-5) travels north-south just to the east of the project site.

GENERAL PLAN AND ZONING DESIGNATIONS

The City of Orland General Plan designates the project site as Commercial, Light Industrial/Commercial, and Low Density Residential land uses.

The Glenn County General Plan identifies the project site as Residential Estate One Acre (RE-1) and Highway and Visitor Commercial District (HVC), under the County zoning Code.

Approvals required for project implementation include rezoning the project site to the Highway Service Commercial (C-H), and annexation of the project site to the City. **Figure 3** shows the existing General Plan land use, and **Figure 4** shows the existing zoning.

REQUESTED ENTITLEMENTS AND OTHER APPROVALS

The City of Orland is the Lead Agency for the proposed project, pursuant to the State Guidelines for Implementation of CEQA (Guidelines Section 15050).

This document will be used by the City of Orland to take the following actions:

- Adoption of the CEQA Exemption (CEQA Guidelines Section 15183).
- Annexation of the project site, subject to review and approval by the Glenn County LAFCO.
- Rezoning of the project site to the Highway Service Commercial Zone.

The following agencies may be required to issue permits or approve certain aspects of the proposed project:

- North Coastal Regional Water Quality Control Board (NCRWQCB) - Storm Water Pollution Prevention Plan (SWPPP) approval prior to construction activities.
- Glenn County Air Pollution Control District (APCD) - Approval of construction-related air quality permits.
- Glenn County Local Agency Formation Commission (LAFCO) – Review of the proposed annexation request.

PREVIOUS ENVIRONMENTAL ANALYSES OF THE PROPOSED PROJECT

One previous environmental analysis has been prepared and certified which is applicable to the proposed project.

In October 2010, the City of Orland adopted a new General Plan and certified the associated General Plan EIR (State Clearinghouse (SCH) # 2008102073). The proposed project would be consistent with the General Plan designations of Commercial, Light Industrial/Commercial, and Low Density Residential land uses, as described above. The General Plan EIR assumed full development and buildout of the project site, consistent with the uses and development

standards proposed by the project. The cumulative impacts associated with buildout of the City of Orland General Plan, including the project site, were fully addressed in the General Plan EIR.

CEQA GUIDELINES SECTION 15183 EXEMPTIONS

CEQA Guidelines Section 15183 allows a streamlined environmental review process for projects that are consistent with the densities established by existing zoning, community plan or general plan policies for which an Environmental Impact Report (EIR) was certified. As noted above, the proposed project is consistent with the land use designation and densities established by the Orland General Plan, for which an EIR was certified. The provisions contained in Section 15183 of the CEQA Guidelines are presented below.

15183. Projects Consistent with a Community Plan or Zoning

(a) CEQA mandates that projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. This streamlines the review of such projects and reduces the need to prepare repetitive environmental studies.

(b) 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.*

(c) If an impact is not peculiar to the parcel or to the project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, as contemplated by subdivision (e) below, then an additional EIR need not be prepared for the project solely on the basis of that impact.

(d) This section shall apply only to projects which meet the following conditions:

(1) The project is consistent with:

- (A) A community plan adopted as part of a general plan,*
- (B) A zoning action which zoned or designated the parcel on which the project would be located to accommodate a particular density of development, or*
- (C) A general plan of a local agency, and*

(2) An EIR was certified by the lead agency for the zoning action, the community plan, or the general plan.

(e) This section shall limit the analysis of only those significant environmental effects for which:

(1) Each public agency with authority to mitigate any of the significant effects on the environment identified in the planning or zoning action undertakes or requires others to undertake mitigation measures specified in the EIR which the lead agency found to be feasible, and

(2) The lead agency makes a finding at a public hearing as to whether the feasible mitigation measures will be undertaken.

(f) 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. Such development policies or standards need not apply throughout the entire City or county, but can apply only within the zoning district in which the project is located, or within the area subject to the community plan on which the lead agency is relying. Moreover, such policies or standards need not be part of the general plan or any community plan, but can be found within another pertinent planning document such as a zoning ordinance. Where a City or county, in previously adopting uniformly applied development policies or standards for imposition on future projects, failed to make a finding as to whether such policies or standards would substantially mitigate the effects of future projects, the decision-making body of the City or county, prior to approving such a future project pursuant to this section, may hold a public hearing for the purpose of considering whether, as applied to the project, such standards or policies would substantially mitigate the effects of the project. Such a public hearing need only be held if the City or county decides to apply the standards or policies as permitted in this section.

(g) Examples of uniformly applied development policies or standards include, but are not limited to:

(1) Parking ordinances.

(2) Public access requirements.

(3) Grading ordinances.

(4) Hillside development ordinances.

(5) Flood plain ordinances.

(6) Habitat protection or conservation ordinances.

(7) View protection ordinances.

(8) Requirements for reducing greenhouse gas emissions, as set forth in adopted land use plans, policies, or regulations.

(h) An environmental effect shall not be considered peculiar to the project or parcel solely because no uniformly applied development policy or standard is applicable to it.

(i) Where the prior EIR relied upon by the lead agency was prepared for a general plan or community plan that meets the requirements of this section, any rezoning action consistent with the general plan or community plan shall be treated as a project subject to this section.

(1) “Community plan” is defined as a part of the general plan of a City or county which applies to a defined geographic portion of the total area included in the general plan, includes or references each of the mandatory elements specified in Section 65302 of the Government Code, and contains specific development policies and implementation measures which will apply those policies to each involved parcel.

(2) For purposes of this section, “consistent” means that the density of the proposed project is the same or less than the standard expressed for the involved parcel in the general plan, community plan or zoning action for which an EIR has been certified, and that the project complies with the density-related standards contained in that plan or zoning. Where the zoning ordinance refers to the general plan or community plan for its density standard, the project shall be consistent with the applicable plan.

(j) This section does not affect any requirement to analyze potentially significant offsite or cumulative impacts if those impacts were not adequately discussed in the prior EIR. If a significant offsite or cumulative impact was adequately discussed in the prior EIR, then this section may be used as a basis for excluding further analysis of that offsite or cumulative impact.

PROJECT-SPECIFIC ENVIRONMENTAL REVIEW

The attached Environmental Checklist includes a discussion and analysis of any peculiar or site-specific environmental impacts associated with construction and operation of the proposed project. The Environmental Checklist identifies the applicable City of Orland development standards and policies that would apply to the proposed project during both the construction and operational phases, and explains how the application of these uniformly applied standards and policies would ensure that no peculiar or site-specific environmental impacts would occur.

CONCLUSION

As described above, the proposed Orland Annexation (project) is consistent with the land use designations and development intensities assigned to the project site by the City of Orland General Plan. Cumulative impacts associated with development and buildout of the project site, as proposed, were fully addressed in the City of Orland General Plan EIR (SCH# 2008102073). Since the proposed project is consistent with the land use designation and development intensity for the site identified in the General Plan and analyzed in the General Plan EIR, implementation of the proposed project would not result in any new or altered cumulative impacts beyond those addressed in the General Plan EIR.

The analysis in the attached CEQA Environmental Checklist demonstrates that there are no site-specific or peculiar impacts associated with the project, and identifies uniformly applied standards and policies that would be applied to the project. The Project Requirements identified in the attached environmental analysis include requirements that must be implemented by the proposed project in order to ensure that any site-specific impacts or construction-related

impacts are reduced to a less than significant level. All Project Requirements identified in the attached Environmental Checklist shall be made a condition of project approval and shall be implemented within the timeframes identified.



Legend

-  Project Location
-  Incorporated Area
-  County Boundary

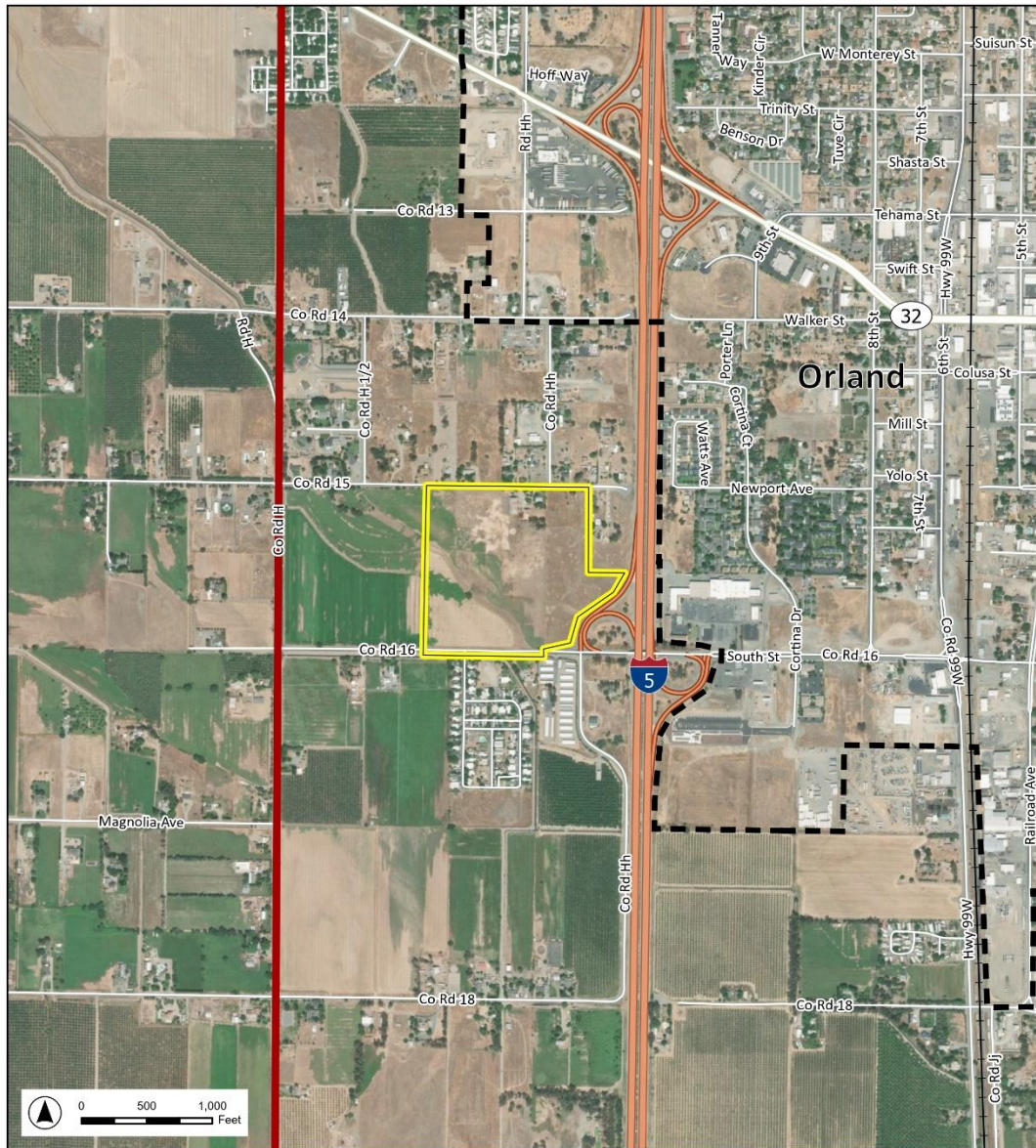
WEST ORLAND ANNEXATION

Figure 1. Regional Map

Sources: California State Geoportal; USGS Transportation Dataset. Map Date: January 4, 2026

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A LAND USE PLANNING, DESIGN, AND ENVIRONMENTAL FIRM

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- Legend**
- West Orland Annexation Area
 - City of Orland
 - Orland Sphere of Influence

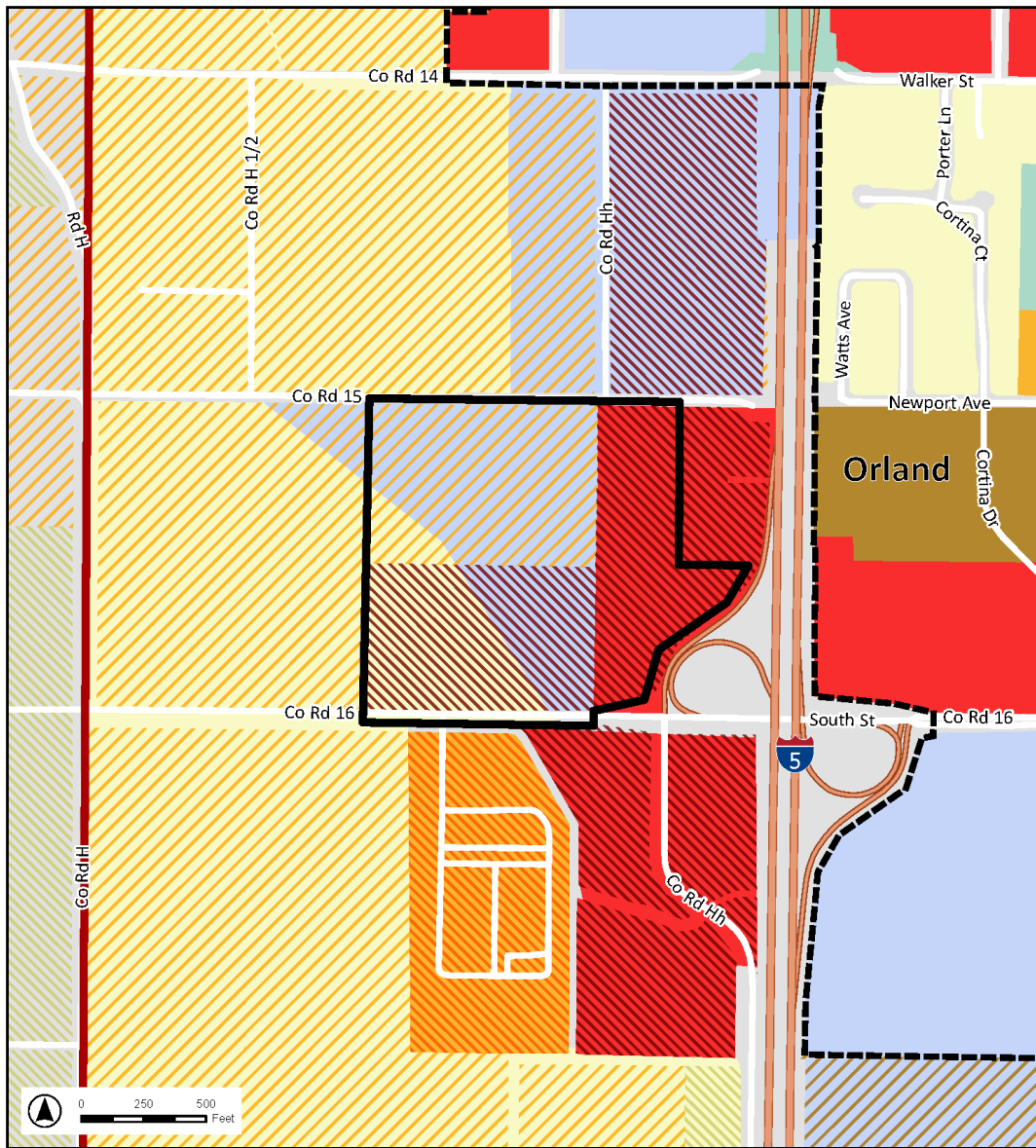
WEST ORLAND ANNEXATION

Figure 2. Vicinity Map

Sources: California State Geoportal; USGS Transportation Dataset; Vivid Imagery 7/19/2023. Map Date: January 4, 2026.

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Legend

- West Orland Annexation Area
- City of Orland
- Orland Sphere of Influence

City of Orland General Plan Land Use

- Low Density Residential
- Medium Density Residential
- High Density Residential
- Commercial
- Light Industrial/Commercial
- Public Facility

Glenn County General Plan Land Use

- Rural Residential
- Suburban Residential
- Multiple Family Residential
- Urban Reserve
- Highway and Service Commercial

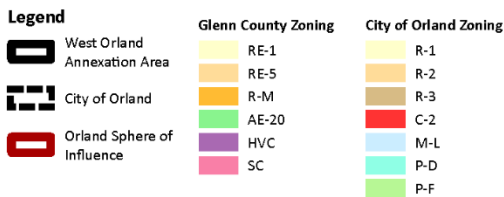
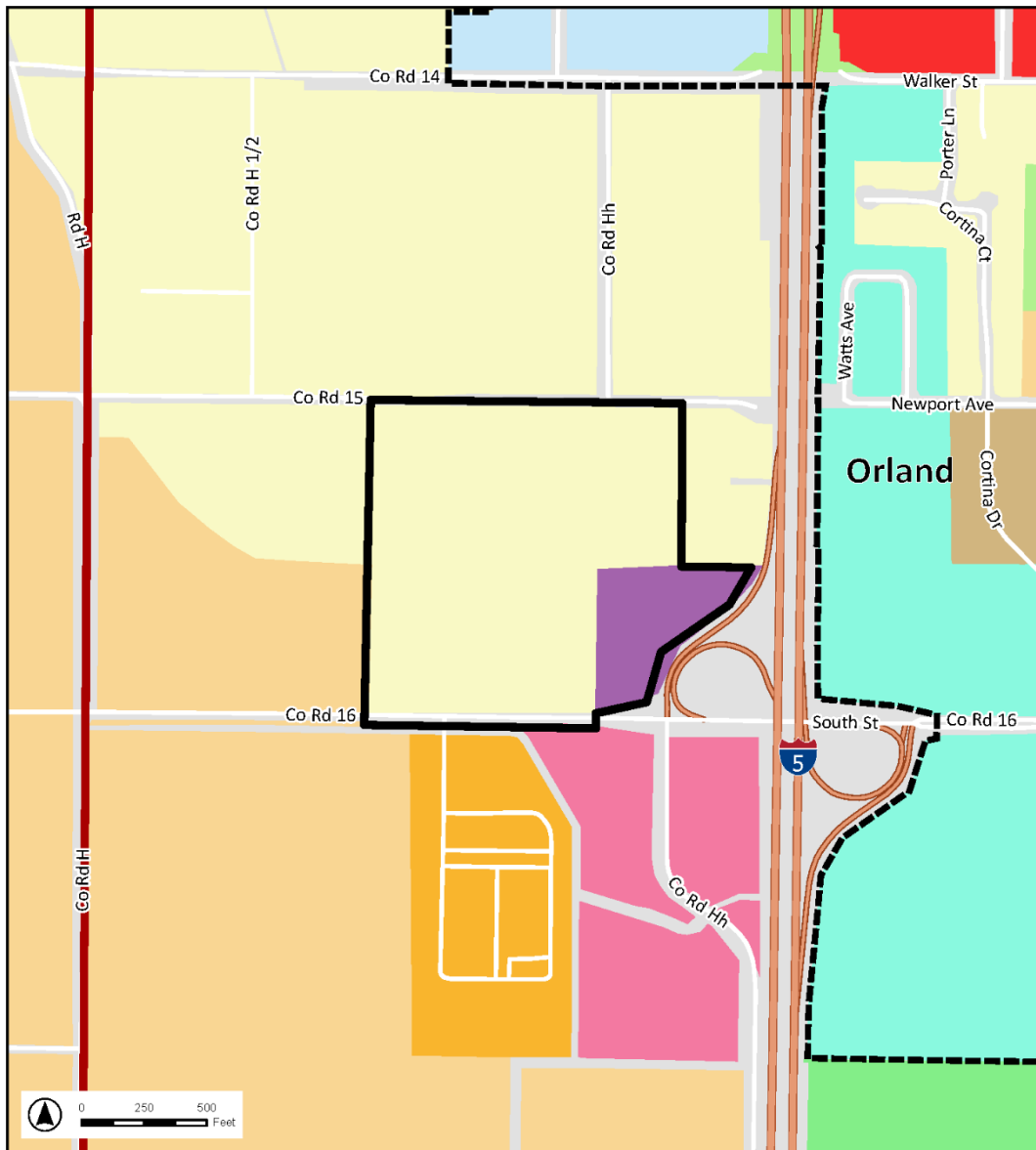
WEST ORLAND ANNEXATION

Figure 3. Existing General Plan

Sources: California State Geoportal; USGS Transportation Dataset; Glenn County General Plan; City of Orland General Plan. Map Date: January 4, 2026.

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WEST ORLAND ANNEXATION

Figure 4. Existing Zoning

Sources: California State Geoportal; USGS Transportation Dataset; Glenn County Zoning Map; City of Orland Zoning Map. Map Date: January 4, 2026.

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ENVIRONMENTAL CHECKLIST

I. AESTHETICS -- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			X	
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 the applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

RESPONSES TO CHECKLIST QUESTIONS

Response a): Less than Significant. There are no scenic vistas located on or adjacent to the project site. Noteworthy scenic vistas that can be seen from the City of Orland include Mount Lassen and the Cascade and Sierra mountains and foothills and the Coastal Range. However, it these scenic vistas are views of distant scenic resources and a building of 35 or 45 feet in height would not necessarily block these views.

Commercial uses are subject to the height restrictions and design standards, as designated by the Orland Zoning Code.

The proposed project uses are consistent and compatible with the surrounding land use designations. The project site is located in a commercial, light industrial, and rural residential area. As stated in the City of Orland General Plan EIR, since most travelers pass through the City on highways such as I-5, the City considers facilitating well-designed development along this corridor as key to establishing a desirable community image.

The project site is located in a relatively rural area that is surrounded by agricultural, commercial, light industrial, and rural residential uses. The surrounding area adjacent to the project site includes agricultural uses to the east, west, and south; rural residential uses to the north, east, and south; some commercial uses are located to the east of the Project site (i.e. the Orland Inn and the K&M Thai Noodle House). Orland Estates, a mobile home park, is located south of the Project site. Additionally, Interstate 5 (I-5) travels north-south just to the east of the project site.

Implementation of the proposed project would allow for additional commercial development on a project site that is bordered by similarly scaled uses, as described above. The project site is not topographically elevated from the surrounding lands and is not highly visible from areas beyond the immediate vicinity of the site. There are no prominent features on the site, such as visually distinct trees, rock outcroppings, or other visually distinctive features that contribute to the scenic quality of the site. The project site is not designated as a scenic vista by the City of Orland General Plan.

Implementation of the proposed project would not significantly change the existing visual character of the project area, since much of the areas within and immediately adjacent to the site are used for commercial and other similar purposes.

Implementation of the proposed project would allow for further commercial development to the project area that would be generally consistent with the surrounding land uses. The proposed project would not have a substantial effect on a scenic vista. Therefore, this impact is considered **less than significant**.

Response b): Less than Significant. As described in the Orland General Plan EIR, there are no Officially Dedicated California Scenic Highway segments in the Orland Planning Area. Development of the proposed project, there would not result in the removal of any substantial trees, rock outcroppings, or buildings of historical significance, and would not result in changes to any of the viewsheds from the designated scenic highways in the vicinity of the City of Orland. Therefore, there is a **less than significant impact**.

Response c): Less than Significant. As described under Response a), above, the proposed project would add additional commercial land uses to an area that currently contains numerous commercial, light industrial, agricultural, and rural residential land uses near to the Project site. The proposed project would be visually compatible with the surrounding land uses and would not significantly degrade the existing visual quality of the site or the surrounding area. Additionally, the project will comply with City standards. Overall, the exterior facades of the anticipated structures, streetscape improvements, and exterior lighting improvements would be compatible with the surrounding land uses. This is a **less than significant impact**.

Response d): Less than Significant. Daytime glare can occur when the sunlight strikes reflective surfaces such as windows, vehicle windshields and shiny reflective building materials. The proposed project would introduce new commercial land uses into the project site; however, reflective building materials are not anticipated for use in the project, and as such, the project is not anticipated to result in increases in daytime glare. Further, if reflective building materials are used, they would be limited to glass materials for buildings, which would not generate substantial glare.

The proposed project would include exterior lighting around the structures, and also potentially within any future landscaped areas within the site. Allowed uses would be consistent with the applicable height restrictions and design standards, as designated by the Orland Zoning Code. The City's Zoning Ordinance requires commercial and industrial exterior lighting to be designed

to reflect away from adjacent residential uses or to the ground within the site property (Sections 17.36.060(D)(2), 17.40.060(C)(2), 17.44.050(D)(2), 17.48.050(D)(20), and 17.52.060(D)(2)). Therefore, this is a **less than significant impact**.

II. AGRICULTURE AND FOREST RESOURCES -- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 1222(g)) or timberland (as defined in Public Resources Code section 4526)?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
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?				X

RESPONSES TO CHECKLIST QUESTIONS

Response a): No Impact. The project site is underlain entirely by Arbuckle gravelly loam, Cortina very gravelly sandy loam, and Tehama loam soils.¹ Some of these soils are considered Prime Farmland soil, Farmland of Statewide Importance, and Farmland of Local Importance.

The project site currently consists primarily of agricultural land. The proposed project is identified primarily for commercial uses in the Orland General Plan, and the project is consistent with the uses established by the General Plan. Development of the site for urban uses and the corresponding conversion of agricultural land associated with buildout of the Orland General Plan, including the project site, was taken into consideration in the City of Orland General Plan and General Plan EIR. On February 21, 2012 the Orland City Council adopted a Statement of Overriding Considerations (Resolution No. 2012-01) for the direct impacts to farmland resulting from adoption of the General Plan and EIR. As such, implementation of the proposed project would have **no impact** related to this environmental topic.

Response b): No Impact. The project site is not under William Act contract. Nevertheless, the project site and some of the parcels immediately adjacent to the project site are designated for agricultural uses. However, development of the site for urban uses and the corresponding conversion of agricultural land associated with buildout of the Orland General Plan, including the project site, was taken into consideration in the City of Orland General Plan and General Plan EIR.

¹ See: <https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>

On February 21, 2012 the Orland City Council adopted a Statement of Overriding Considerations (Resolution No. 2012-01) for the direct impacts to farmland resulting from adoption of the General Plan and EIR. As such, implementation of the proposed project would have **no impact** related to this environmental topic.

Responses c) and d): No Impact. The project site is located in an area consisting of primarily existing agricultural uses. There are no forest resources on the project site or in the immediate vicinity of the project site. Therefore, there is **no impact**.

Response e): No Impact. As described under Responses (a) and (b) above, development of the site for urban uses and the corresponding conversion of agricultural land associated with buildout of the Orland General Plan, including the project site, was taken into consideration in the City of Orland General Plan and General Plan EIR. On February 21, 2012 the Orland City Council adopted a Statement of Overriding Considerations (Resolution No. 2012-01) for the direct impacts to farmland resulting from adoption of the General Plan and EIR. As such, implementation of the proposed project would have **no impact** related to this environmental topic.

III. AIR QUALITY -- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
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?			X	
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

EXISTING SETTING

The project site is located within the boundaries of the Glenn County Air Pollution Control District (APCD). This agency is responsible for monitoring air pollution levels and ensuring compliance with federal and state air quality regulations within Glenn County and has jurisdiction over most air quality matters within its borders.

RESPONSES TO CHECKLIST QUESTIONS

Responses a), b): Less than Significant. Air quality emissions would be generated during construction of the proposed project and during operation of the proposed project. Operational emissions would come primarily from vehicle emissions from vehicle trips generated by the proposed project, as well as energy consumption and area sources.

Criteria Pollutant Emissions

Construction would result in numerous activities that would generate dust. The fine, silty soils in the project area and often strong afternoon winds exacerbate the potential for dust, particularly in the summer months. Grading, leveling, earthmoving and excavation are the activities that generate the most particulate emissions. Impacts would be localized and variable. The initial phase of project construction would involve grading and leveling the project site and installation of supporting underground infrastructure, such as water, sewer, storm drain, and electrical lines.

Operational activities would also generate criteria pollutant emissions, primarily associated with mobile vehicles, energy consumption, and area sources. Development of the site for urban uses and the corresponding criteria pollutant emissions that would be associated with buildout of the Orland General Plan, including the project site, was taken into consideration in the City of Orland General Plan and General Plan EIR. On February 21, 2012 the Orland City Council adopted a Statement of Overriding Considerations (Resolution No. 2012-01) for the significant generation of long-term ROG, NO_x, and PM emissions resulting from adoption of the General Plan.

The proposed project is identified for commercial, light industrial, and low density residential land uses in the Orland General Plan. The proposed project is consistent with the overriding considerations that were adopted for the General Plan and the established mitigation measures under that Plan. As such, implementation of the proposed project would not create new impacts over and above those identified in the General Plan EIR, nor significantly change previously identified impacts. Overall, the project would result in **less-than-significant** impact relative to this environmental topic.

Response c): Less than Significant. Sensitive receptors are those parts of the population that can be severely impacted by air pollution. Sensitive receptors include children, the elderly, and the infirm. The nearest sensitive receptors to the project site are the residences located adjacent to the project site to the north and south.

Development of the site for urban uses and the corresponding potential to expose sensitive receptors to substantial pollutant concentrations that would be associated with buildout of the Orland General Plan, including the project site, was taken into consideration in the City of Orland General Plan and General Plan EIR. On February 21, 2012 the Orland City Council adopted a Statement of Overriding Considerations (Resolution No. 2012-01) for the significant generation of long-term ROG, NO_x, and PM emissions resulting from adoption of the General Plan.

The proposed project is identified for commercial, light industrial, and low density residential land uses in the Orland General Plan. The proposed project is consistent with the overriding considerations that were adopted for the General Plan and the established mitigation measures under that Plan. As such, implementation of the proposed project would not create new impacts over and above those identified in the General Plan EIR, nor significantly change previously identified impacts. Overall, the project would result in **less-than-significant** impact relative to this environmental topic.

Response d): Less than Significant. Operation of the proposed project would not generate notable odors. The commercial uses included in the proposed project would be compatible with the surrounding land uses. People in the immediate vicinity of construction activities may be subject to temporary odors typically associated with construction activities (diesel exhaust, hot asphalt, etc.). However, any odors generated by construction activities would be minor and would be short and temporary in duration.

Examples of facilities that are known producers of operational odors include: Wastewater Treatment Facilities, Chemical Manufacturing, Sanitary Landfill, Fiberglass Manufacturing, Transfer Station, Painting/Coating Operations (e.g., auto body shops), Composting Facility, Food Processing Facility, Petroleum Refinery, Feed Lot/Dairy, Asphalt Batch Plant, and Rendering Plant. If a project would locate receptors and known odor sources in proximity to each other further analysis may be warranted; however, if a project would not locate receptors and known odor sources in proximity to each other, then further analysis is not warranted. The project does not propose sensitive receptors that could be exposed to odors in the vicinity. Should any of the commercial uses generate odors during construction, the odors would be contained within the

building envelope(s) and proper ventilation would be provided. This is a **less-than-significant impact**.

IV. BIOLOGICAL RESOURCES -- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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?			X	
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?				X
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?				X
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?			X	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X	
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?			X	

*RESPONSES TO CHECKLIST QUESTIONS***Response a): Less than Significant.**

As described in the General Plan EIR, land use and development consistent with the proposed General Plan, including within the project site, could result in adverse impacts on special-status species or essential habitat for special-status species.

Impacts to special-status species occur for a number of reasons, though primarily through increased utilization of a landscape by humans for travel (i.e., roadways), agricultural, residential, commercial, or industrial purposes, resulting in habitat fragmentation, encroachment by exotic weeds and area-wide changes in surface water flows due to development of previously undeveloped areas. Any development within areas that are currently undeveloped could result in impacts to habitat resources that may support special-status species. Construction within the project could result in direct take of habitat and loss of individuals of these species.

Where there are direct impacts to special-status species, indirect impacts could occur as well. Indirect impacts include increased human/wildlife interactions and loss resulting from encroachment by exotic weeds.

Development of the site for urban uses and the corresponding potential to have a substantial effect on any candidate, sensitive, or special status species that would be associated with buildout of the Orland General Plan, including the project site, was taken into consideration in the City of Orland General Plan and General Plan EIR. On February 21, 2012 the Orland City Council adopted a Statement of Overriding Considerations (Resolution No. 2012-01) for the significant generation of long-term ROG, NO_x, and PM emissions resulting from adoption of the General Plan.

The proposed project is identified for commercial, light industrial, and low density residential land uses in the Orland General Plan. The proposed project is consistent with the overriding considerations that were adopted for the General Plan and the established mitigation measures under that Plan. As such, implementation of the proposed project would not create new impacts over and above those identified in the General Plan EIR, nor significantly change previously identified impacts. Overall, the project would result in **less-than-significant** impact relative to this environmental topic.

Response b): No Impact. Riparian natural communities support woody vegetation found along rivers, creeks and streams. Riparian habitat can range from a dense thicket of shrubs to a closed canopy of large mature trees covered by vines. Riparian systems are considered one of the most important natural resources. While small in total area when compared to the state's size, they provide a special value for wildlife habitat.

Over 135 California bird species either completely depend upon riparian habitats or use them preferentially at some stage of their life history. Riparian habitat provides food, nesting habitat, cover, and migration corridors. Another 90 species of mammals, reptiles, invertebrates and amphibians depend on riparian habitat. Riparian habitat also provides riverbank protection, erosion control and improved water quality, as well as numerous recreational and aesthetic values.

There is no riparian habitat or other sensitive natural communities located on the project site. As such, the proposed project would have **no impact** on these resources, and no mitigation is required.

Response c): No Impact A wetland is an area that is inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas.

Wetlands are defined by regulatory agencies as having special vegetation, soil, and hydrology characteristics. Hydrology, or water inundation, is a catalyst for the formation of wetlands. Frequent inundation and low oxygen causes chemical changes to the soil properties resulting in what is known as hydric soils. The prevalent vegetation in wetland communities consists of hydrophytic plants, which are adapted to areas that are frequently inundated with water.

Hydrophytic plant species have the ability to grow, effectively compete, reproduce, and persist in low oxygen soil conditions.

There are no wetlands located on the project site. As such, the proposed project would have **no impact** on this environmental topic, and no mitigation is required.

Response d): Less than Significant. There are no documented wildlife corridors or wildlife nursery sites on or adjacent to the project site. Implementation of the proposed project would have a **less-than-significant impact**.

Responses e), f): Less than Significant. No habitat conservation plans (HCPs) or natural community conservation plans (NCCPs) occur within the City of Orland. Development of the project site would not conflict with any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved conservation plan. Therefore, this is a **less-than-significant impact**.

V. CULTURAL RESOURCES -- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Cause a substantial adverse change in the significance of a historical resource pursuant to '15064.5?			X	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to '15064.5?			X	
c) Disturb any human remains, including those interred outside of formal cemeteries?			X	

RESPONSES TO CHECKLIST QUESTIONS

Response a), b), c): Less than Significant. The City of Orland General Plan and EIR do not identify the project site as having prehistoric period, or cultural resources. Additionally, there are no known unique cultural, historical, paleontological or archeological resources known to occur on, or within the immediate vicinity of the project site.

Because the site has been previously disturbed by preexisting agricultural operations, it is not anticipated that site grading and preparation activities would result in impacts to cultural, historical, archaeological or paleontological resources. There are no known human remains located on the project site, nor is there evidence to suggest that human remains may be present on the project site. However, as with most projects in California that involve ground-disturbing activities, there is the potential for discovery of a previously unknown cultural and historical resource or human remains.

The implementation of Project Requirement 1 would require appropriate steps to preserve and/or document any previously undiscovered resources that may be encountered during construction activities, including human remains. Implementation of this requirement would reduce this impact to a **less than significant** level.

Project Requirement(s)

Project Requirement 1: *If any prehistoric or historic artifacts, human remains or other indications of archaeological resources are found during grading and construction activities, an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards in prehistoric or historical archaeology, as appropriate, shall be consulted to evaluate the finds and recommend appropriate mitigation measures.*

- *If cultural resources or Native American resources are identified, every effort shall be made to avoid significant cultural resources, with preservation an important goal. If significant sites cannot feasibly be avoided, appropriate mitigation measures, such as data recovery excavations or photographic documentation of buildings, shall be undertaken consistent with applicable state and federal regulations.*

- *If human remains are discovered, all work shall be halted immediately within 50 meters (165 feet) of the discovery, the County Coroner must be notified, according to Section 5097.98 of the State Public Resources Code and Section 7050.5 of California's Health and Safety Code. If the remains are determined to be Native American, the coroner will notify the Native American Heritage Commission, and the procedures outlined in CEQA Section 15064.5(d) and (e) shall be followed.*
- *If any fossils are encountered, there shall be no further disturbance of the area surrounding this find until the materials have been evaluated by a qualified paleontologist, and appropriate treatment measures have been identified.*

VI. ENERGY

<i>Would the project:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X	

RESPONSES TO CHECKLIST QUESTIONS

Responses a-b): Less than Significant. Appendix G of the State CEQA Guidelines requires consideration of the potentially significant energy implications of a Project. CEQA requires mitigation measures to reduce “wasteful, inefficient and unnecessary” energy usage (Public Resources Code Section 21100, subdivision [b][3]). According to Appendix G of the CEQA Guidelines, the means to achieve the goal of conserving energy include decreasing overall energy consumption, decreasing reliance on natural gas and oil, and increasing reliance on renewable energy sources. In particular, the proposed project would be considered “wasteful, inefficient, and unnecessary” if it were to violate state and federal energy standards and/or result in significant adverse impacts related to project energy requirements, energy inefficiencies, energy intensiveness of materials, cause significant impacts on local and regional energy supplies or generate requirements for additional capacity, fail to comply with existing energy standards, otherwise result in significant adverse impacts on energy resources, or conflict or create an inconsistency with applicable plan, policy, or regulation.

The amount of energy used at the project site would directly correlate to the energy consumption (including fuel) used by vehicle trips generated during project construction, fuel used by off-road construction vehicles during construction, fuel used by vehicles during project operation, and electricity usage during project operation.

The proposed project would comply with all existing energy standards, including those established by the City of Orland and Glenn County. For example, buildings developed as part of the proposed project would be required to comply with the latest version of the California Building Energy Efficiency Standards (Title 24), which require a high degree of energy efficiency for new buildings. Additionally, the project would be required to comply with other statewide measures, including those intended to improve the energy efficiency of the statewide passenger and heavy-duty truck vehicle fleet (e.g., the Pavley Bill and the Low Carbon Fuel Standard), which improve vehicle fuel economies, thereby conserving gasoline and diesel fuel for any trips that would be generated by the project. These energy savings would continue to accrue over time.

Overall, the proposed project would not violate any state or federal energy standards and/or result in significant adverse impacts related to project energy requirements, energy efficiencies, energy intensiveness of materials, cause significant impacts on local and regional energy supplies or generate requirements for additional capacity, fail to comply with existing energy standards, otherwise result in significant adverse impacts on energy resources, or conflict or create an

inconsistency with applicable plan, policy, or regulation. Therefore, the proposed project would not be expected cause an inefficient, wasteful, or unnecessary use of energy resources nor cause a significant impact on any of the threshold as described by Appendix G of the CEQA Guidelines. This is a **less-than-significant impact**.

VII. GEOLOGY AND SOILS -- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Expose people or structures to 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.			X	
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?			X	
iv) Landslides?			X	
b) Result in substantial soil erosion or the loss of topsoil?			X	
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?			X	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?			X	
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?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X	

RESPONSES TO CHECKLIST QUESTIONS

Responses a.i), a.ii): Less than Significant. The project site, as with virtually all sites within the State of California, is subject to minor ground shaking and potential secondary hazards (i.e., liquefaction and subsidence) as a result of earthquakes. The primary seismic hazard associated with the project site is minor ground shaking, which can result in partial collapse of buildings and extensive damage in poorly built or substandard structures. The project site is not located within an Alquist-Priolo earthquake hazard zone. The closest active fault system is the 40-mile-long Willows fault, located about 10 miles west of the City. As such, future seismic events associated

with this fault system are not anticipated to adversely affect the project site, and ground rupture due to faulting is considered to be unlikely.

Based upon the seismologic and geologic conditions within the project site, significant damage or risk due to earthquake activity is relatively unlikely. The City adopted the 2001 California Code of Regulations, Title 24, also known as the California Building Standards Code or California Building Code. Implementation of these regulations throughout development is designed to prevent significant damage from ground shaking during seismic events resulting from movement on any of the faults or fault systems.

Seismic design provisions of current building codes generally prescribe minimum lateral forces, applied statically to the structure, combined with the gravity forces of dead-and-live loads. The code-prescribed lateral forces are generally considered to be substantially smaller than the comparable forces that would be associated with a major earthquake. Therefore, structures should be able to: (1) resist minor earthquakes without damage, (2) resist moderate earthquakes without structural damage but with some nonstructural damage, and (3) resist major earthquakes without collapse but with some structural as well as nonstructural damage.

Building new structures for human use would increase the number of people exposed to local and regional seismic hazards. Seismic hazards are a significant risk for most property in California.

The Safety Element of the Orland General Plan includes several goals, objectives and policies to reduce the risks to the community from earthquakes and other geologic hazards. The Safety Element contains a policies, such as Policy 4.6.A and Program 4.6.A.1, that require the City to consider the potential for expansive soils and earthquake-related hazards when reviewing applications for development projects. In most cases the City may require a soils report in order to evaluate shrink-swell and liquefaction potential of proposed project sites and implement measures to minimize unstable soil hazards. General Plan Program 4.6.A.2 requires that public buildings and areas designed for assembly within the Planning Area are constructed to meet seismic safety standards. Program 4.6.A.3 and Program 4.6.A.4 provide assistance to owners of existing buildings making structural improvements to meet seismic standards.

The City reviews all proposed development projects for consistency with the General Plan policies and California Building Code provisions identified above. This review occurs throughout the project application review and processing stage, and throughout plan check and building inspection phases prior to the issuance of a certificate of occupancy.

Consistency with the requirements of the California Building Code and the Orland General Plan policies identified above would ensure that impacts on humans associated with seismic hazards would be **less than significant**.

Responses a.iii): Less than Significant. Liquefaction normally occurs when sites underlain by saturated, loose to medium dense, granular soils are subjected to relatively high ground shaking. During an earthquake, ground shaking may cause certain types of soil deposits to lose shear strength, resulting in ground settlement, oscillation, loss of bearing capacity, landsliding, and the

buoyant rise of buried structures. The majority of liquefaction hazards are associated with sandy soils, some silty soils of low plasticity, and some gravelly soils. Cohesive soils are generally not considered to be susceptible to liquefaction. In general, liquefaction hazards are most severe within the upper 50 feet of the surface, except where slope faces or deep foundations are present. Soils that underlay the project site consist of predominantly clay soil particle sizes. Clay-type soils are generally not subject to liquefaction.

As identified in the Orland General Plan EIR, the majority of the Orland Planning Area, including the project site is at low risk for liquefaction. Prior to development of the project site, a subsurface geotechnical investigation must be performed to identify onsite soil conditions and identify any site-specific engineering measures to be implemented during the construction of building foundations and subsurface utilities. Adherence to the engineering requirements contained in the subsurface geotechnical report would ensure that this impact is **less than significant**.

Project Requirement(s)

Project Requirement 2: *Prior to development of the project site, a subsurface geotechnical investigation must be performed to identify onsite soil conditions and identify any site-specific engineering measures to be implemented during the construction of building foundations and subsurface utilities.*

Responses a.iv): Less than Significant. The project site is relatively flat and there are no major slopes in the vicinity of the project site. As such, the project site is exposed to little or no risk associated with landslides. This is a **less-than-significant impact**.

Response b): Less than Significant. During the construction preparation process, exposed surfaces could be susceptible to erosion from wind and water. Effects from erosion include impacts on water quality and air quality. Exposed soils that are not properly contained or capped increase the potential for increased airborne dust and increased discharge of sediment and other pollutants into nearby stormwater drainage facilities. Risks associated with erosive surface soils can be reduced by using appropriate controls during construction and properly re-vegetating exposed areas. Project Requirement 3 (Hydrology and Water Quality) would require the implementation of various best management practices (BMPs) and a SWPPP that would reduce the potential for disturbed soils and ground surfaces to result in erosion and sediment discharge into adjacent surface waters during construction activities. The implementation of these requirements would ensure impacts are **less than significant**.

Responses c), d): Less than Significant. The project site has a low to high potential for expansive soils, as described in the Orland General Plan EIR. A soil's potential to shrink and swell depends on the amount and types of clay in the soil. Certain clays expand when wet and disproportionately shrink when dry. Soils with moderate to high shrink/swell potential tend to expand during wet seasons and shrink during dry seasons. In addition, soils with moderate to high shrink-swell potential generally have low plasticity levels which affect the expansion potential of soils. The clayey soils within the project site contain layers of highly expansive soils dispersed throughout the area, which could pose development constraints. Highly expansive soils

can cause structural damage to foundations and roads and are less suitable for development than non-expansive soils.

According to the Glenn County General Plan, the project site has a relatively high potential for expansive soils. Detailed geologic investigations may be necessary for areas with moderate to high shrink-swell potential. Development on expansive soils requires special grading and construction techniques.

As previously noted, the City has adopted the California Building Code. The California Building Code includes common engineering practices requiring special design and construction methods that reduce or eliminate potential expansive soil-related impacts. In addition, for subdivision projects requiring a final map, the Subdivision Map Act requires a preliminary soils report. Furthermore, Project Requirement 2 requires a subsurface geotechnical investigation to be performed to identify onsite soil conditions, and identification of site-specific engineering measures to be implemented during the construction of building foundations and subsurface utilities.

To reduce the potential for post-construction distress to the proposed structures resulting from swelling and shrinkage of these materials, a geotechnical evaluation is required by Project Requirement 2 in order to reduce the potential for damaging differential settlement of overlying improvements. Additionally, the California Building Code Title 24, Part 2, Chapter 18, Section 1803.1.1.2 requires specific geotechnical evaluation when a preliminary geotechnical evaluation determines that expansive or other special soil conditions are present, which, if not corrected, would lead to structural defects. As such, this is a **less-than-significant impact**.

Response e): No Impact. The project site would be served by public wastewater facilities and does not require an alternative wastewater system such as septic tanks. Implementation of the proposed project would have **no impact** on this environmental issue.

Response f): Less than Significant. The project site is located in an area with the potential to contain paleontological resources. The implementation of Project Requirement 1 would require appropriate steps to preserve and/or document any previously undiscovered resources that may be encountered during construction activities, including paleontological resources. As such, this is a **less-than-significant impact**.

XIII. GREENHOUSE GAS EMISSIONS – WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?			X	

BACKGROUND DISCUSSION

Various gases in the Earth's atmosphere, classified as atmospheric greenhouse gases (GHGs), play a critical role in determining the Earth's surface temperature. Solar radiation enters Earth's atmosphere from space, and a portion of the radiation is absorbed by the Earth's surface. The Earth emits this radiation back toward space, but the properties of the radiation change from high-frequency solar radiation to lower-frequency infrared radiation.

Naturally occurring GHGs include water vapor (H₂O), carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and ozone (O₃). Several classes of halogenated substances that contain fluorine, chlorine, or bromine are also GHGs, but they are, for the most part, solely a product of industrial activities. Although the direct GHGs CO₂, CH₄, and N₂O occur naturally in the atmosphere, human activities have changed their atmospheric concentrations. From the pre-industrial era (i.e., ending about 1750) to 2019, concentrations of these three GHGs have increased globally by 47, 156, and 23 percent, respectively (IPCC, 2023).

Greenhouse gases, which are transparent to solar radiation, are effective in absorbing infrared radiation. As a result, this radiation that otherwise would have escaped back into space is now retained, resulting in a warming of the atmosphere. This phenomenon is known as the greenhouse effect. Among the prominent GHGs contributing to the greenhouse effect are carbon dioxide (CO₂), methane (CH₄), ozone (O₃), water vapor, nitrous oxide (N₂O), and chlorofluorocarbons (CFCs).

Emissions of GHGs contributing to global climate change are attributable in large part to human activities associated with the industrial/manufacturing, utility, transportation, residential, and agricultural sectors. Consumption of fossil fuels in the transportation sector was the single largest source of California's GHG emissions in 2024, accounting for 39% of total GHG emissions in the state. This category was followed by the industrial sector (23%), the electricity generation sector (including both in-state and out of-state sources) (16%) and the agriculture and forestry sector (8%).²

² California Energy Commission. 2026. California Greenhouse Gas Emission Inventory – 2025 Edition. Available at: <https://ww2.arb.ca.gov/ghg-inventory-data>

As the name implies, global climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants, which are pollutants of regional and local concern, respectively. California produced approximately 371 million gross metric tons of carbon dioxide equivalents (MMTCO₂e) in 2022.³ Given that worldwide emissions from human activities totaled approximately 53 billion gross metric tons of carbon dioxide equivalents (BMTCO₂e) in 2024, California's incremental contribution to global GHGs is approximately 2%.⁴

Carbon dioxide equivalents are a measurement used to account for the fact that different GHGs have different potential to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. This potential, known as the global warming potential of a GHG, is also dependent on the lifetime, or persistence, of the gas molecule in the atmosphere. Expressing GHG emissions in carbon dioxide equivalents takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO₂ were being emitted.

RESPONSES TO CHECKLIST QUESTIONS

Response a), b): Less than Significant. Development of the site for urban uses and the corresponding generation of GHG emissions associated with buildout of the Orland General Plan, including the project site, was taken into consideration in the City of Orland General Plan and General Plan EIR.

On February 21, 2012 the Orland City Council adopted a Statement of Overriding Considerations (Resolution No. 2012-01) for the significant generation of long-term ROG, NO_x, and PM emissions resulting from adoption of the General Plan.

The proposed project is identified for commercial, light industrial, and low density residential land uses in the Orland General Plan. The proposed project is consistent with the overriding considerations that were adopted for the General Plan and the established mitigation measures under that Plan. As such, implementation of the proposed project would not create new impacts over and above those identified in the General Plan EIR, nor significantly change previously identified impacts. Overall, the project would result in **less-than-significant** impact relative to this environmental topic.

³ California Energy Commission. 2026. California Greenhouse Gas Emission Inventory – 2025 Edition. Available at: <https://ww2.arb.ca.gov/ghg-inventory-data>

⁴ European Commission. 2025. World emissions hit record high, but the EU leads trend reversal. September 9, 2025. Available at: https://joint-research-centre.ec.europa.eu/jrc-news-and-updates/world-emissions-hit-record-high-eu-leads-trend-reversal-2025-09-09_en

IX. HAZARDS AND HAZARDOUS MATERIALS -- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
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?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
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?			X	
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?			X	
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			X	

RESPONSES TO CHECKLIST QUESTIONS

Responses a), b): Less than Significant. The proposed project would place new commercial uses in an area of the City that currently contains predominantly agricultural, commercial, light industrial, and rural residential uses. The proposed commercial land uses would not routinely transport, use, or dispose of hazardous materials, or present a reasonably foreseeable release of hazardous materials, with the exception of common residential grade hazardous materials such as household cleaners, paint, etc. The operational phase of the proposed project would not pose a significant hazard to the public or the environment.

As stated in the City's General Plan and General Plan EIR, all uses that handle potentially hazardous materials are required, prior to issuance of a building permit or license, to obtain approval of a hazardous material permit from the County Environmental Health Department. The hazardous material permit requires the applicant to list all hazardous materials used or

generated in the operation of their business. Their plan to store, handle, or release these hazardous materials must receive the approval of the County Environmental Health Department. The business is monitored by the Environmental Health Department on a regular basis to determine compliance with the hazardous material permit approved by the department.

Any operations that involve the use of hazardous materials would be required to have the hazardous material transported, stored, used, and disposed of in compliance with local, state, and federal regulations. The Glenn County Air Pollution Control District is the Certified Unified Program Agencies (CUPA) for Glenn County and is responsible for the implementation of statewide programs within the city including Hazardous Materials Business Plan (HMBP) requirements, among numerous other programs. Additionally, businesses are regulated by Cal/Occupational Safety and Health Administration (OSHA) and are therefore required to ensure employee safety. Specific requirements include identifying hazardous materials in the workplace, providing safety information to workers that handle hazardous materials, and adequately training workers. To further ensure the safety of employees, and reduce the potential for accidental release of hazardous materials into the environment, the applicant must submit a HMBP to the APCD for review and approval prior to bringing hazardous materials onsite.

Construction equipment and materials would likely require the use of petroleum-based products (oil, gasoline, diesel fuel), and a variety of common chemicals including paints, cleaners, and solvents. Transportation, storage, use, and disposal of hazardous materials during construction activities would be required to comply with applicable federal, state, and local statutes and regulations. Compliance would ensure that human health and the environment are not exposed to hazardous materials. In addition, Project Requirement 3 (Hydrology and Water Quality) requires the project applicant to implement a SWPPP during construction activities, which would prevent any contaminated runoff from leaving the project site. Therefore, compliance with applicable federal, state, local statutes and regulations, and the SWPPP provided in Project Requirement 3, the proposed project would have a **less-than-significant impact** relative to this issue.

Response c): Less than Significant. The project site is not located within 1/4-mile of an existing school. The nearest school to the project site is the C.K. Price Middle School, located approximately 0.7 miles east of the project site. Therefore, this is a **less-than-significant impact**.

Response d): Less than Significant. According the California Department of Toxic Substances Control (DTSC), there are no Federal Superfund Sites, State Response Sites, or Voluntary Cleanup Sites on, or adjacent to the project site. The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5.

The nearest site to the proposed project is located approximately 0.7 miles northeast of the project site. Information relating to this site is provided below:

VERESCHAGIN OIL COMPANY (11510007)

- Cleanup Status: REFER: RWQCB AS OF 12/30/2008
- Site Type: Evaluation

- National Priorities List: No
- Cleanup Oversight Agency:
 - None Specified

Additionally, there are no Federal Superfund Sites, State Response Sites, or Voluntary Cleanup Sites on, or adjacent to the project site. The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5. Therefore, implementation of the proposed project would result in a **less-than-significant impact** relative to this environmental topic.

Response e): Less than Significant. The Federal Aviation Administration (FAA) establishes distances of ground clearance for take-off and landing safety based on such items as the type of aircraft using the airport.

The Orland Airport (Orland-Haigh Field) is the closest airport to the project site, located approximately 3 miles to the southeast. The Airport is owned by Glenn County. The airport is not located within two miles of the project site, nor is the project site located within an airport land use plan. Therefore, implementation of the proposed project would result in a **less-than-significant impact** relative to this environmental topic.

Response f): No Impact. The General Plan includes policies that require the City to maintain emergency access routes that are free of traffic impediments (Policy 4.1.B, Program 4.1.B.1, Program 4.1.B.2). The proposed project does not include any actions that would impair or physically interfere with an adopted emergency response plan or emergency evacuation plan. The project involves the development of commercial land uses within an urbanized environment and would not interfere with any emergency response or evacuation plans. Implementation of the proposed project would result in **no impact** on this environmental topic.

Response g): Less than Significant. The risk of wildfire is related to a variety of parameters, including fuel loading (vegetation), fire weather (winds, temperatures, humidity levels and fuel moisture contents) and topography (degree of slope). Steep slopes contribute to fire hazard by intensifying the effects of wind and making fire suppression difficult. Fuels such as grass are highly flammable because they have a high surface area to mass ratio and require less heat to reach the ignition point, while fuels such as trees have a lower surface area to mass ratio and require more heat to reach the ignition point.

The project site is not located within a designated wildfire hazard area.⁵ Since the project site is not located within a designated wildfire hazard area, this is a **less-than-significant impact**.

⁵ <https://www.glenncountyrca.org/files/9a9d8cabb/Map+B.pdf>

X. HYDROLOGY AND WATER QUALITY -- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
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:			X	
(i) result in substantial erosion or siltation on- or off-site;			X	
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;			X	
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems to provide substantial additional sources of polluted runoff; or			X	
(iv) impede or redirect flood flows?			X	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			X	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	

RESPONSES TO CHECKLIST QUESTIONS

Response a): Less than Significant. Construction associated the project would consist of grading and vegetation removal activities that would increase soil erosion rates. These activities would result in the exposure of raw soil materials to the natural elements (wind, rain, etc.). In rainy periods, grading operations may impact the surface runoff by increasing the amount of silt and debris carried by runoff. Areas with uncontrolled concentrated flow would experience loss of material within the graded areas, and this could potentially impact the downstream water quality.

Refueling and parking of construction equipment and other vehicles on-site during construction may result in spills of oil, grease, or related pollutants that may discharge into drainages.

Improper handling, storage, or disposal of fuels and materials or improper cleaning of machinery close to area waterways could cause water quality degradation.

The State Water Resources Control Board is responsible for implementing elements of the Clean Water Act and has issued a statewide General Permit (Water Quality Order 99-08-DWQ) for construction activities within the state. The State General Construction Activity Storm Water Permit is implemented and enforced by Regional Water Quality Control Boards and applies to construction activities that disturb one acre or more. This permit also requires the preparation and implementation of a Storm Water Pollution Prevention Plan that identifies BMPs to minimize pollutants from discharging from construction sites to the maximum extent practicable.

The BMPs that must be implemented can be grouped into two major categories: (1) erosion and sediment control BMPs and (2) non-stormwater management and materials management BMPs. Erosion and sediment control BMPs fall into four main subcategories:

- Erosion controls
- Sediment controls
- Wind erosion controls
- Tracking controls

During construction of projects within the City, the dischargers must eliminate non-stormwater discharges to stormwater systems, develop and implement a Storm Water Pollution Prevention Plan, and perform monitoring of discharges to stormwater systems.

During operation, runoff from the project site could contain oils, grease, fuel, antifreeze, and byproducts of combustion (such as lead, cadmium, nickel, and other metals), as well as nutrients from fertilizers and animal waste, sediment, pesticides, herbicides, and other pollutants. Also, sizable quantities of animal waste from pets (e.g., dogs, cats, and horses) contribute bacterial pollutants into surface and source waters. Precipitation during the early portion of the wet season displaces these pollutants into the stormwater runoff, resulting in high pollutant concentrations in the initial wet weather runoff. This initial runoff, containing peak pollutant levels, is referred to as the “first flush” of storm events. It is estimated that during the rainy season, the first flush of heavy metals and hydrocarbons would occur during the first 5 inches of seasonal rainfall.

The amount and type of runoff generated by development of the project site would be greater than that under existing conditions due to increases in impervious surfaces. There would be a corresponding increase in urban runoff pollutants and first flush roadway contaminants such as heavy metals, oil, and grease, as well as an increase in nutrients (i.e., nitrates and phosphates), and pesticides and herbicides from landscaped areas. These constituents would result in water quality impacts to on- and off-site drainage flows and to downstream area waterways, including Hambright and Stony Creeks as well as the Sacramento River.

Surface waters provide for a variety of functions for plants and animals, including a water source, habitat, foraging, cover, and migration and movement corridors. Adverse impacts to surface

waters can cause detrimental harm to the organisms that rely upon these waters and to biological integrity as a whole.

The collection of fees and determined fair share fee amounts are adopted by the City as Conditions of Approval (COAs) for all new development projects prior to project approval. The payment of applicable development impact fees by the proposed project would ensure that the project pays its fair-share of capital improvement fees towards future system expansions. Additionally, through compliance with the NPDES permit requirements, and compliance with the SWPPP, the proposed project would not result in a violation of any water quality standards or waste discharge requirements. Therefore, through compliance with the NPDES, the SWPPP required by Project Requirement 3, impacts are considered **less than significant**.

Implementation of the above proposed General Plan policies and programs as well as compliance with NPDES permit requirements would ensure that both construction-related and operational impacts to surface water resources in the General Plan Planning Area would be less than significant.

Project Requirement(s)

Project Requirement 3: *The project applicant shall prepare a Storm Water Pollution Prevention Plan (SWPPP) that includes specific types and sources of stormwater pollutants, determine the location and nature of potential impacts, and specify appropriate control measures to eliminate any potentially significant impacts on receiving water quality from stormwater runoff. The SWPPP shall require treatment BMPs that incorporate, at a minimum, the required hydraulic sizing design criteria for volume and flow to treat projected stormwater runoff. The SWPPP shall comply with the most current standards established by the North Coast RWQCB. Best Management Practices shall be selected from the City's Manual of Stormwater Quality Control Standards for New Development and Redevelopment according to site requirements and shall be subject to approval by the City Engineer and North Coast RWQCB.*

Response b): Less than Significant. The proposed project would not result in the construction of new groundwater wells, nor would it increase existing levels of groundwater pumping. The proposed project would be served by the City's municipal water system.

Groundwater recharge occurs primarily through percolation of surface waters through the soil and into the groundwater basin. The addition of significant areas of impervious surfaces (such as roads, parking lots, buildings, etc.) can interfere with this natural groundwater recharge process. Upon full project buildout, portions of the project site would be covered in impervious surfaces, which would limit the potential for groundwater percolation to occur on the project site.

Because the City has adequate existing water service capacity to serve the project, and the limited scope of impervious surface coverage (when compared to the larger groundwater basin), the proposed project would result in **less-than-significant impacts** related to depletion of groundwater supplies and interference with groundwater recharge.

Response c): Less than Significant. When land is in a natural or undeveloped condition, soils, mulch, vegetation, and plant roots absorb rainwater. This absorption process is called infiltration or percolation. Much of the rainwater that falls on natural or undeveloped land slowly infiltrates the soil and is stored either temporarily or permanently in underground layers of soil. When the soil becomes completely soaked or saturated with water or the rate of rainfall exceeds the infiltration capacity of the soil, the rainwater begins to flow on the surface of land to low lying areas, ditches, channels, streams, and rivers. Rainwater that flows off of a site is defined as storm water runoff. When a site is in a natural condition or is undeveloped, a larger percentage of rainwater infiltrates into the soil and a smaller percentage of flows off the site as storm water runoff.

The infiltration and runoff process is altered when a site is developed with urban uses. Houses, buildings, roads, and parking lots introduce asphalt, concrete, and roofing materials to the landscape. These materials are relatively impervious, which means that they absorb less rainwater. As impervious surfaces are added to the ground conditions, the natural infiltration process is reduced. As a result, the volume and rate of storm water runoff increase. The increased volumes and rates of storm water runoff may result in flooding if adequate storm drainage facilities are not provided.

There are no rivers, streams, or water courses located on or immediately adjacent to the project site. As such, there is no potential for the project to alter a water course, which could lead to on or offsite flooding. Drainage improvements associated with the project site would be located on the project site, and the project would not alter or adversely impact offsite drainage facilities.

Development of the project site would place impervious surfaces on portions of the project site. Development of the project site would potentially increase local runoff production, and would introduce constituents into storm water that are typically associated with urban runoff. These constituents include heavy metals (such as lead, zinc, and copper) and petroleum hydrocarbons. BMPs will be applied to the proposed site development to limit the concentrations of these constituents in any site runoff that is discharged into downstream facilities to acceptable levels. Stormwater flows from the project site would be directed to the two proposed retention basins by a new stormwater conveyance system.

In order to ensure that stormwater runoff from the project site does not adversely increase pollutant levels in adjacent surface waters and stormwater conveyance infrastructure, Project Requirement 3 requires the preparation of a SWPPP. As described previously, the SWPPP would require the application of BMPs to effectively reduce pollutants from stormwater leaving the site during both the construction and operational phases of the project.

The project is also required to pay all applicable development impact fees, which would include funding for offsite Citywide storm drainage infrastructure. The collection of fees and determined fair share fee amounts are adopted by the City as COAs for all new development projects prior to project approval. The payment of applicable development impact fees by the proposed project would ensure that the project pays its fair-share of capital improvement fees towards future system expansions.

In order to ensure that stormwater runoff from the project site does not adversely increase pollutant levels in adjacent surface waters and stormwater conveyance infrastructure, or otherwise degrade water quality, Project Requirement 3 requires the preparation of a SWPPP, and structural BMPs. As described above, the SWPPP would require the application of BMPs to effectively reduce pollutants from stormwater leaving the site, which would ensure that stormwater runoff does not adversely increase pollutant levels, and would reduce the potential for disturbed soils and ground surfaces to result in erosion and sediment discharge into adjacent surface waters during construction and operational phases of the project. The implementation of this requirement would reduce this impact to a less than significant level.

Implementation of Project Requirements 3 would ensure that this impact is **less than significant**.

Response d): Less than Significant. Flooding can be a major problem and is most predominant throughout the Central Valley region along the Sacramento River corridor. All of the mapped floodplains in the City of Orland Planning Area are located along Hambright and Stony Creeks. These two creeks traverse areas in the vicinity of locations where future development is likely to occur. However, the project site is not located near these creeks, nor is it located within the 100-year floodplain. The 100-year floodplain denotes an area that has a one percent chance of being inundated during any particular 12-month period.

Floodplain zones are determined by the Federal Emergency Management Agency (FEMA) and used to create Flood Insurance Rate Maps (FIRMs). These tools assist cities in mitigating flooding hazards through land use planning. FEMA also outlines specific regulations for any construction, whether residential, commercial, or industrial within 100-year floodplains.

Separately, the project site is located within a dam inundation risk area for the Black Butte Dam. Figure 5 shows a dam failure inundation map, in comparison to the project site. As shown, the City of Orland, including the project site, is within this dam inundation risk area.

The safety of dams in California is stringently monitored by the California Department of Water Resources, Division of Safety of Dams (DSD). The DSD is responsible for inspecting and monitoring the dam in perpetuity. The proposed project would not result in actions that could result in a higher likelihood of dam failure. There will always be a remote chance of dam failure that results in flooding of portions of the city.

The proposed project is identified for commercial land uses in the Orland General Plan. The proposed project is consistent with the overriding considerations that were adopted for the General Plan and the established mitigation measures under that Plan. As such, implementation of the proposed project would not create new impacts over and above those identified in the General Plan EIR, nor significantly change previously identified impacts, relating to dam inundation.

Additionally, there are no significant bodies of water near the project site that could result in the occurrence of a seiche or tsunami. Additionally, the project site and the surrounding areas are

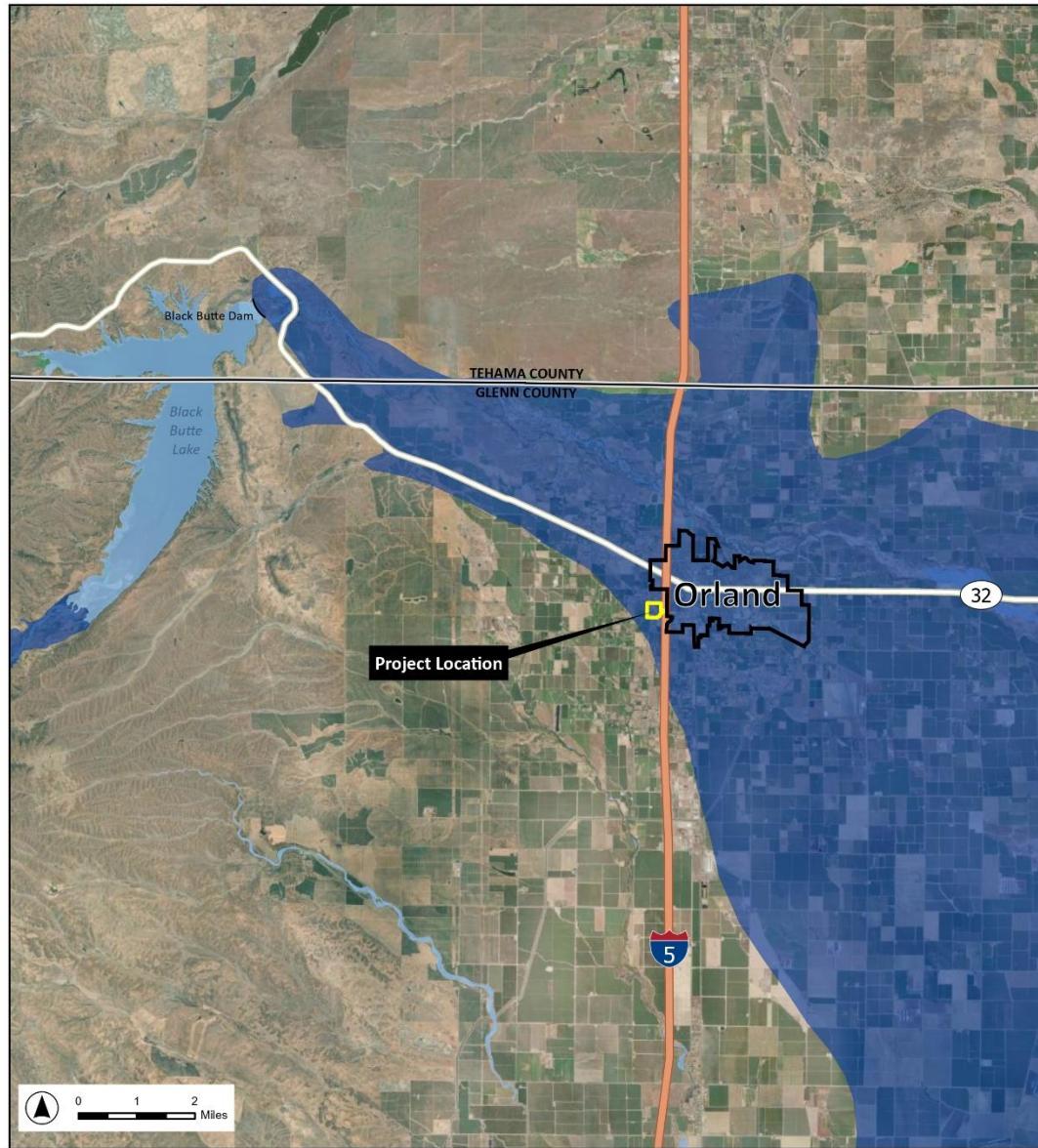
relatively flat, which precludes the possibility of mudflows occurring on the project site. This is a **less-than-significant impact**.

Response e): Less than Significant. As discussed previously, upon full project buildout, portions of the project site would be covered in impervious surfaces, which would limit the potential for groundwater percolation to occur on the project site. However, given the relatively large size of the groundwater basin in the Orland area, the areas of impervious surfaces added as a result of project implementation will not adversely affect the recharge capabilities of the local groundwater basin. Additionally, the project would maintain pervious surfaces within the on-site landscaping and retention basins. These pervious areas could maintain opportunities for groundwater recharge.

Additionally, Project Requirement 3 requires the preparation of a SWPPP, and structural BMPs. The SWPPP would require the application of BMPs to effectively reduce pollutants from stormwater leaving the site, which would ensure that stormwater runoff does not adversely increase pollutant levels, and would reduce the potential for disturbed soils and ground surfaces to result in erosion and sediment discharge into adjacent surface waters during construction and operational phases of the project. Additionally, the project will be required to submit a stormwater control plan that demonstrates the project incorporates site design measures, landscape features, and engineered treatment facilities (typically bioretention facilities) that will minimize imperviousness, retain or detain stormwater, slow runoff rates, and reduce pollutants in post-development runoff.

Conclusion

Overall, implementation of the proposed project would have a **less-than-significant impact** relative to this topic.



Legend

- West Orland Annexation Area
- City of Orland
- County Boundary
- Water Feature
- Black Butte Dam Failure Inundation Area

WEST ORLAND ANNEXATION

Figure 5. Dam Failure Inundation Areas

Sources: California State Geoportal; USGS Transportation Dataset; California Office of Emergency Services. Map Date: January 5, 2026.

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A LAND USE PLANNING, DESIGN, AND ENVIRONMENTAL FIRM

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XI. LAND USE AND PLANNING - WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Physically divide an established community?				X
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?			X	

RESPONSES TO CHECKLIST QUESTIONS

Response a): No Impact. The project site is located in a commercial, light industrial, and rural residential area. The surrounding area adjacent to the project site includes agricultural uses to the east, west, and south; rural residential uses to the north, east, and south; some commercial uses are located to the east of the Project site (i.e. the Orland Inn and the K&M Thai Noodle House). Orland Estates, a mobile home park, is located south of the Project site. Additionally, Interstate 5 (I-5) travels north-south just to the east of the project site. The project site and the surrounding uses are designated Commercial, Light Industrial/Commercial, Rural Residential, and Medium Residential by the City's General Plan. The project would be consistent and compatible with the surrounding land uses, and would not divide an established community. There is **no impact**.

Response b): Less than Significant. The City Orland General Plan land use designation for the project site is Commercial, Light Industrial/Commercial, and Low Density Residential. The Commercial designation allows up to 60 percent building coverage and up to 100 percent coverage by parking/paved areas in the downtown area. This classification is intended to provide for a range of uses including retail stores, restaurants, professional and medical offices, large office complexes, light manufacturing plants, outdoor recreation facilities, hotels, and many other uses involving the sale of a product or a service. The Light Industrial/Commercial designation allows for uses such as processing, packaging, machinery, repair, fabricating, distribution, warehousing and storage, research and development, and similar uses which omit limited amounts of smoke, noise, light, or pollutants. Lastly, the Low Density Residential designation allows for development at a density of up to 6 dwelling units per acre.

The proposed use and density on the project site is consistent with the General Plan designations of Commercial, Light Industrial/Commercial, and Low Density Residential. The project's consistency with other General Plan policies that provide environmental protections are addressed within the relevant sections of this document. This is a **less-than-significant impact**.

XII. MINERAL RESOURCES -- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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?				X
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?				X

RESPONSES TO CHECKLIST QUESTIONS

Responses a), b): No Impact. The sand and gravel currently mined in the region is used primarily for construction. Construction aggregates are an important, fundamental building material used extensively as a foundation and road base material. In terms of volume and price, there is presently no economically viable substitute for aggregate products. The demand for aggregate products in the region has increased with the region's population and corresponding physical growth. Under the proposed General Plan, demand is expected to increase, as population and physical growth continue to increase. Should known resources become depleted or unavailable, the aggregates industry will need to relocate or begin importing, at a much higher cost, from more distant areas.

There is currently no mining activity occurring within, nor is it allowed in the project site. Furthermore, the General Plan, nor the Glenn County General Plan identify any mineral resource zones within the City of Orland or the project site. Therefore, implementation of the project would have a less than significant impact on mineral resources. Therefore, the project would not result in the loss of availability of a known mineral resource. There is **no impact**.

XIII. NOISE -- WOULD THE PROJECT RESULT IN:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Generation of a 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?			X	
b) Generation of excessive groundborne vibration or groundborne noise levels?			X	
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?			X	

RESPONSES TO CHECKLIST QUESTIONS

Response a): Less than Significant. The proposed project is located in an area consisting predominately of commercial, light industrial, agricultural, and rural residential uses. Depending on the ultimate tenant of the proposed buildings, the commercial land uses would generate operational noise levels similar to those associated with common commercial land uses, such as retail and consumer service activities, and office uses. However, traffic generated by the proposed project has the potential to contribute to roadway noise levels in the vicinity of the project site and throughout other areas of the City. Increases in roadway noise and other sources of noise associated with buildout of the Orland General Plan, including the project site, was taken into consideration in the City of Orland General Plan and General Plan EIR. On February 21, 2012 the Orland City Council adopted a Statement of Overriding Considerations (Resolution No. 2012-01) for the significant generation of long-term ROG, NO_x, and PM emissions resulting from adoption of the General Plan.

The proposed project is identified for commercial, light industrial, and low density residential land uses in the Orland General Plan. The proposed project is consistent with the overriding considerations that were adopted for the General Plan and the established mitigation measures under that Plan. As such, implementation of the proposed project would not create new impacts over and above those identified in the General Plan EIR, nor significantly change previously identified impacts.

The Orland General Plan Noise Element contains several policies that are intended to ensure that new development projects are not exposed to excessive noise levels. The General Plan Noise Element policies applicable to the proposed project are summarized below.

Policy 6.1.A and Policy 6.1.F identify interior and exterior noise level standards for noise-sensitive areas of new uses affected by traffic or railroad noise sources as well as non-

transportation noise sources in the City of Orland. Policies 6.1.B and 6.1.H state that where the noise level standards (Table 6-3 and 6-5 in the proposed General Plan) are predicted to be exceeded at new uses proposed within the City of Orland which are affected by traffic or railroad noise and/or are affected by or include non-transportation noise sources, appropriate noise mitigation measures and/or conditions of approval shall be included in the project design to reduce projected noise levels to a state of compliance with the standards identified in Table 6-3 and 6-5 in the proposed General Plan.

Policy 6.1.D states that if future railroad operations occur during nighttime hours (10 p.m. to 7 a.m.), then proposals for the development of new residential uses within 1,000 feet of railroad grade crossings should address noise impacts in terms of the potential for sleep disturbance. Policy 6.1.E states that if an acoustical analysis is required by the City to assess compliance with the City's Noise Element standards, it shall be prepared in accordance with Table 6-4 of the proposed General Plan, Requirements for Acoustical Analyses Prepared in Orland. This table identifies noise analysis standards such as the requirement that all noise analyses include representative noise level measurements with sufficient sampling periods and locations to adequately describe local conditions as well as the need for all noise analyses to be prepared by qualified persons experienced in the fields of environmental noise assessment and architectural acoustics.

The proposed project would not directly generate increased noise beyond those activities commonly found in commercial uses. The noise directly generated by the project would not differ from the existing ambient noises currently generated by the surrounding commercial, light industrial, agricultural, and rural residential uses. The project is not anticipated to generate significant noise levels, given that activities would be limited to vehicle traffic, and the loading and unloading of materials.

However, the proposed project is expected to increase ambient noise levels in the project vicinity through the introduction of additional vehicle trips to area roadways, particularly along nearby roadways such as Bungalow Road and W. Newport Road. However, as described above, development of the site for commercial uses and the subsequent increase in vehicle roadway noise was taken into consideration in the City of Orland General Plan and General Plan EIR. On February 21, 2012 the Orland City Council adopted a Statement of Overriding Considerations (Resolution No. 2012-01) for the significant generation of long-term ROG, NO_x, and PM emissions resulting from adoption of the General Plan.

Additionally, construction activities at the project site would result in temporary increases in noise levels that could expose adjacent residences to increased noise levels and noise nuisances. Construction activities could create temporary noise levels of up to 90 dBA at distances of 50 feet. Because the project site is surrounded by existing residential neighborhoods, this temporary increase in construction noise is considered potentially significant.

Project Requirement 4 would place restrictions on the time of day that construction activities can occur, and includes additional techniques to reduce noise levels at adjacent residences during

construction activities. The implementation of this requirement would reduce this temporary impact to a **less-than-significant** level.

Project Requirement(s)

Project Requirement 4: *The following requirements shall be implemented during all construction phases of the project:*

- a) Construction activities (excluding activities that would result in a safety concern to the public or construction workers) shall be limited to between the hours of 7:00 a.m. and 7:00 p.m. Construction activities shall be prohibited on Sundays and federal holidays.*
- b) Construction equipment shall be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations.*
- c) Construction equipment staging areas shall be located at the furthest distance possible from nearby noise-sensitive land uses.*

Response b): Less than Significant. No major stationary sources of groundborne vibration were identified in the project area that would result in the long-term exposure of proposed onsite land uses to unacceptable levels of ground vibration. In addition, the proposed project would not involve the use of any major equipment or processes that would result in potentially significant levels of ground vibration that would exceed these standards at nearby existing land uses. However, construction activities associated with the proposed project would require the use of various tractors, trucks, and potentially jackhammers that could result in intermittent increases in groundborne vibration levels. The use of major groundborne vibration-generating construction equipment/processes (i.e., blasting, pile driving) is not anticipated to be required for construction of the proposed project.

Groundborne vibration levels commonly associated with construction equipment are summarized in Table NOISE-1. Based on the levels presented in Table NOISE-1, groundborne vibration generated by construction equipment would not be anticipated to exceed approximately 0.09 inches per second (in/sec) peak particle velocity (ppv) at 25 feet. Predicted vibration levels would not be anticipated to exceed recommended criteria for structural damage and human annoyance (0.2 and 0.1 in/sec ppv, respectively) at nearby land uses. As a result, short-term groundborne vibration impacts would be considered **less than significant** and no mitigation is required.

Table NOISE-1: Representative Vibration Source Levels for Construction Equipment

<i>EQUIPMENT</i>	<i>PEAK PARTICLE VELOCITY AT 25 FEET (IN/SEC)</i>
Large Bulldozers	0.089
Loaded Trucks	0.076
Jackhammer	0.035
Small Bulldozers	0.003

SOURCE: FTA 2006, CALTRANS 2004.

Response c): Less than Significant. The Orland Airport (Orland-Haigh Field) is the closest airport to the project site, located approximately 3 miles to the southeast. The Airport is owned by Glenn County. There are no airports within 2 miles of the project site. The project site is also not within the vicinity of a private airstrip or an airport land use plan. This is a **less-than-significant impact**.

XIV. POPULATION AND HOUSING -- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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)?			X	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?			X	

RESPONSES TO CHECKLIST QUESTIONS

Response a): Less than Significant. The proposed project could induce population growth directly and/or indirectly, dependent on the exact uses located within the Project site. Regardless, the potential for the project to directly or indirectly induce population growth in the City of Orland is not a significant impact in and of itself. Population growth can result in impacts to other environmental topics, such as traffic, service demands, etc. The population and employment growth that would occur as a result of approval and development of the proposed project was considered in the Orland General Plan and General Plan EIR. The proposed project is consistent with the land use designation for the site that was addressed in the General Plan EIR, and the environmental effects of the employment growth generated by the project were considered in the analysis of buildout of the Orland General Plan. Additionally, as described throughout this environmental document, the employment growth attributable to the proposed project would not result in any significant site-specific environmental impacts to other environmental topics that cannot be mitigated to a less-than-significant level. Therefore, this impact is **less than significant**, as demonstrated throughout this document.

Response b): Less than Significant. There are no residences located on the project site. As such, the project would not displace any residences. Moreover, the land uses proposed as part of the project were considered in the Orland General Plan and General Plan EIR. The proposed project is consistent with the land use designation for the site that was addressed in the General Plan EIR, and the environmental effects of the displacement generated by the project was considered in the analysis of buildout of the Orland General Plan. Therefore, the project would have a **less-than-significant impact**.

XV. PUBLIC SERVICES

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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?			X	
ii) Police protection?			X	
iii) Schools?			X	
iv) Parks?			X	
v) Other public facilities?			X	

*RESPONSES TO CHECKLIST QUESTIONS***Response a):**

i) Fire Protection and Emergency Medical Services: Less than Significant. The Orland Volunteer Fire Department was formed in 1911 after much of Orland's downtown burned in a devastating fire. In July of 2019, the City in partnership with the Orland Rural Fire Protection District and OVFD, hired Orland's first paid Fire Chief, Justin Chaney. Chief Chaney has been the fire chief for the volunteers since 2017.

Recognizing the potential need for increases in fire protection and emergency medical services, the City's General Plan includes policies to ensure that adequate related facilities are funded and provided to meet future growth. Implementation of the proposed project would not adversely impact existing fire and emergency services within the city and would not require the construction of new fire protection facilities. Impact fees from new development are collected based upon projected impacts from each development. The adequacy of impact fees is reviewed on an annual basis to ensure that the fee is commensurate with the service. Payment of the applicable impact fees by the project applicant as COAs prior to project approval, and ongoing revenues that would come from property taxes, sales taxes, and other revenues generated by the project, would fund capital and labor costs associated with fire protection services.

In order to provide adequate fire protection and suppression services to the project site, the Orland Volunteer Fire Department must have access to adequate onsite hydrants with adequate fire-flow pressure available to meet the needs of fire suppression units. The final site plans and development specifications developed for the proposed project will indicate the location and design specifications of the fire hydrants that will be required within the project site. Therefore, this is considered a **less-than-significant impact**.

ii) Police Protection: Less than Significant. The Orland Police Department is the local law enforcement agency serving the city of Orland, California, located at 817 4th Street, Orland, CA 95963. The department is dedicated to proactive policing, crime prevention, community safety, and emergency response, operating 24/7 with a team of 10 full-time sworn officers and 2 full-time civilians.

Impact fees from new developments are collected based upon projected impacts from each development by the City as COAs prior to project approval. The adequacy of impact fees is reviewed on an annual basis to ensure that the fee is commensurate with the service. Payment of the applicable impact fees by the project applicant, and ongoing revenues that would come from property taxes, and other revenues generated by the project, would fund capital and labor costs associated with police services.

It is not anticipated that implementation of the proposed project would result in significant new demand for police services. Project implementation would not require the construction of new police facilities to serve the project site, nor would it result in impacts to the existing response times and existing police protection service levels. Furthermore, the City's General Plan ensures the City maintains adequate police staffing, performance levels and facilities to serve Orland's existing population as well as any future growth. Therefore, this is considered a **less-than-significant impact**.

iii) Schools: Less than Significant. Implementation of the proposed project would result in modest employment growth within the City of Orland, which may increase enrollment at schools within the Orland Unified School District incrementally. The Orland Unified School District collects impact fees from new developments under the provisions of SB 50. Payment of the applicable impact fees by the project applicant, and ongoing revenues that would come from taxes, would fund capital and labor costs associated with school services. The adequacy of fees is reviewed on an annual basis to ensure that the fee is commensurate with the service. Payment of the applicable impact fees by the project applicant, and ongoing revenues that would come from property taxes, sales taxes, and other revenues generated by the project, would fund improvements associated with school services and would ensure that project impacts to school services are **less than significant**.

iv) Parks: Potential project impacts to parks and recreational facilities are addressed in Section XVI, Recreation, of this document.

v) Other Public Facilities: Less than Significant. Other public facilities in the City of Orland include libraries, hospitals, and cultural centers. The proposed project may increase demand on these facilities in a limited capacity. The City of Orland General Plan requires new development to pay its fair share of the costs of public buildings. Payment of the applicable impact fees by the project applicant, as COAs prior to project approval, and ongoing revenues that would come from taxes, would ensure that project impacts to public facilities are **less than significant**.

XVI. RECREATION

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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?			X	
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?			X	

RESPONSES TO CHECKLIST QUESTIONS

Responses a), b): Less than Significant. The proposed project would not increase demand for parks and recreational facilities within the City of Orland and would not increase the use of the City's existing parks and recreation system. The City of Orland requires the payment of the project's fair share in-lieu parks fees, as required by the City's General Plan. The collection of fees and determined fair share fee amounts are adopted by the City as COAs for all new development projects prior to project approval. Fees paid aid in the development of new park space and maintenance as required, to ensure continued high quality park facilities for all City residents. As such, this is a **less-than-significant impact**.

XVII. TRANSPORTATION -- WOULD THE PROJECT:

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

RESPONSES TO CHECKLIST QUESTIONS

Response a): Less than Significant. The project would not conflict with any existing plans or policies related to alternative transportation. The payment of fair-share traffic impact fees would provide funding for transportation improvements throughout the city.

The proposed project is consistent with the General Plan land use designation for the site and is consistent with the assumed density level for development of the site. The generation of vehicle traffic associated with the proposed project was considered during preparation of the Orland General Plan. The Orland General Plan identifies the roadway and intersection improvements needed in order to maintain acceptable levels of service throughout the city.

The collection of fees and determined fair share fee amounts are adopted by the City as COAs for all new development projects prior to project approval. The payment of applicable traffic impact fees by the proposed project would ensure that the project pays its fair-share of capital improvement fees towards the future transportation system improvements and expansions. The payment of these fair-share traffic impact fees would assist the City of Orland with implementation of the various improvements previously planned for, in order to maintain acceptable levels of service throughout the city.

The proposed project would not induce any additional required improvements. The collection of fees and determined fair share fee amounts are adopted by the City as COAs for all new development projects prior to project approval. The payment of the required traffic impact fees to the City of Orland would reduce project-related traffic impacts to a **less than significant** level.

Response b): Less than Significant. As noted previously, the Orland General Plan land use designation for the project site is consistent with the proposed project. An EIR for the City's General Plan was prepared previously, and the proposed project is consistent with the uses assumed for the project site in both documents. The project would not increase transportation-related impacts beyond which were previously analyzed in both the General Plan EIR. This impact would be **less than significant**.

Response c): Less than Significant. Implementation of the proposed project would not result in a geometric design feature that is inconsistent with applicable design standards for the City of Orland. The project would not result in a significant change to the vehicle mix or speed of traffic that is not compatible with the design of existing or planned facility design.

The project would not propose any new roadways or transportation facilities that would be inconsistent with applicable design standards for the City of Orland. The project proposes an increased land use density, which would result in increased travel activity, including vehicle (cars and trucks), bicycle, pedestrian, and potentially transit trips. In order to provide access to and from the project site, the accesses the project site would be designed to serve automobiles, bicyclists, pedestrians, and Surface Transportation Assistance Act (STAA) vehicles. These project-generated trips would be served by existing and planned facilities that are constructed to applicable design standards to serve these travel modes. Therefore, the proposed project would not result in a change to the vehicle mix or speed of traffic that is not compatible with the design of existing or planned roadways and transportation facilities. This impact would be **less than significant**.

Response d): Less than Significant. Implementation of the proposed project would not create roadway and transportation facilities that impede access for emergency response vehicles. The proposed site accessways, improvements to nearby roadways, and internal transportation network is designed to maintain levels of accessibility for police and fire response times, which ensures vehicles have the necessary access when responding to an emergency.

Several emergency (police and fire) services are located near to the project site. The internal circulation is designed to meet City code for emergency vehicle access and would maintain high levels of emergency vehicle accessibility and mobility, which ensures vehicles have the necessary access when responding to an emergency. Emergency vehicles would have unimpeded access to the project site. Therefore, this is considered a **less-than-significant impact**.

XVIII. TRIBAL CULTURAL RESOURCES

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?			X	
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resources to a California Native American tribe.			X	

RESPONSES TO CHECKLIST QUESTIONS

Responses a-b): Less than Significant. There is a potential for the discovery of prehistoric, ethnohistoric, or historic archaeological sites that may meet the definition of Tribal Cultural Resources (TCRs). Although no TCRs have been documented on the project site, the project is in a region where significant cultural resources have been recorded and there remains a potential that undocumented archaeological resources that may meet the TCR definition could be unearthed or otherwise discovered during ground-disturbing and construction activities. Examples of significant archaeological discoveries that may meet the TCR definition would include villages and cemeteries. Due to the possible presence of undocumented TCRs within the project site, construction-related impacts on tribal cultural resources may occur.

Project Requirement 1 in Section V, Cultural Resources, would require appropriate steps to preserve and/or document any previously undiscovered resources that may be encountered during construction activities, including human remains. Implementation of this requirement would reduce this impact to a **less than significant** level.

XIX. UTILITIES AND SERVICE SYSTEMS -- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
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 projects projected demand in addition to the providers existing commitments?			X	
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 reductions goals?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

RESPONSES TO CHECKLIST QUESTIONS**Responses a), c): Less than Significant.****Wastewater**

The City wastewater collection and treatment system comprises an extensive collection system and four sewage treatment ponds. Treated effluent from the treatment facility is discharged to a 50-acre parcel.

All sewage that is generated inside of the city limits is collected and treated by the Orland Wastewater Collection and Treatment Facility (WCTF). Areas immediately surrounding Haigh Field are also served by the WCTF. Other than Haigh Field, areas outside of the city limits are treated by private on-site septic systems. The treatment facility utilizes a primary treatment process consisting of a bar-screen located at the headworks building with screened effluent being disposed into a rotating series of four sewage disposal ponds located west of the airport. These four primary settling ponds, along with two specially lined and isolated brine ponds, are located on a 50-acre City-owned parcel of land.

The Orland General Plan EIR determined that no significant wastewater-related impacts were identified as a result of buildout of the General Plan. Because the project is consistent with the

intended uses allowed under the General Plan no impacts beyond those identified should result from implementation of the proposed project.

The City has adequate capacity to serve the project's projected demand for wastewater treatment services in addition to its existing commitments, and no improvements or expansions to the existing WCTF are required to serve the proposed project. The addition of project-generated wastewater would not result in any RWQCB violations related to effluent treatment or discharge. Implementation of the proposed project would have a **less-than-significant impact**.

Stormwater

The City of Orland's stormwater drainage system consists primarily of surface water conveyance utilizing curbs and gutters which lead to underground drainage pipes that eventually discharge into the Lely Aquatic Pond, the Stony Creek Basin Tributary Area, or on-site retention basin and leach field systems.

Development of the project site would place impervious surfaces on the majority of the project site. Development of the project site would potentially increase local runoff production and would introduce constituents into storm water that are typically associated with urban runoff. These constituents include heavy metals (such as lead, zinc, and copper) and petroleum hydrocarbons. BMPs will be applied to the proposed site development to limit the concentrations of these constituents in any site runoff that is discharged into downstream facilities to acceptable levels.

Permanent onsite storm drainage would be installed to serve the proposed project. The potential environmental impacts of construction of the onsite storm drainage system are addressed throughout this Initial Study, given that all improvements would occur onsite, within the area proposed for disturbance. As described above under the Hydrology and Water Quality Section, new development projects in the City of Orland are required to provide site-specific storm drainage solutions and improvements that are consistent with the overall storm drainage infrastructure approach as required by the City of Orland.

The development of an onsite storm drainage system that is approved by the City engineer, the payment of all applicable fees, and the implementation of a SWPPP that includes specific types and sources of stormwater pollutants, determines the location and nature of potential impacts, and specifies appropriate control measures to eliminate any potentially significant impacts on receiving water quality from stormwater runoff (as required under Project Requirement 3), ensure that impacts to storm water drainage facilities are **less than significant**.

Response b): Less than Significant. Potable water for the proposed project would be supplied from the City's municipal water system. The City of Orland's primary water system, Public Water System 1110001, consists of six wells distributed throughout the City. The sole source of water within the City is groundwater. The wells have an average depth of approximately 200 feet, and the average depth of groundwater is generally between 20 and 50 feet. Pressure for the City water system is provided by gravity flow from an 80,000-gallon elevated storage tank. The wells produce between approximately 500 and 1,200 gallons per minute each.

The water transmission and distribution systems consist of approximately 34 miles of pipeline ranging in diameter from 4 inches to 10 inches. To serve the new development associated with the project site, water lines would need to be installed or extended.

The Colusa Subbasin, which supplies potable water to the City of Orland, shows an average seasonal fluctuation of approximately 5 feet for normal and dry years. Despite seasonal variations, long-term groundwater levels of the Colusa Subbasin have remained relatively constant. As described in the Orland General Plan EIR, the estimated storage capacity to a depth of 200 feet is approximately 13,025,887 acre-feet and estimates of groundwater extraction for agricultural, municipal and industrial, and environmental wetland uses are 310,000; 14,000; and 22,000 acre-feet, respectively. The Department of Water Resources has not identified the Colusa Subbasin as overdrafted in its DWR Bulletin 118. Also, there has been no indication of any existing or anticipated overdraft condition in studies prepared by other entities.

Based on an occupancy factor of 2.50 persons per water service connection and a City population of 12,286 residents, Orland will have approximately 4,914 active water service connections by 2028. Orland General Plan policies ensure that adequate water supply would be available for the proposed project.

Policy 5.6.E encourages conservation of water, as well as minimizing costs associated with pumping and delivery systems. Policy 5.7.B promotes the efficient use of water within the City's Planning Area, which would be achieved by promoting the use of water-conserving devices for new construction and major renovations (Program 5.7.B.1). Program 5.7.B.2 requires new development to fund its fair share portion of its impacts to all water supply-related services and facilities.

Implementation of the proposed General Plan policies and programs listed above as well as the mitigation measures contained within the Orland General Plan EIR, would ensure that sufficient water capacity is available to support new development in conjunction with existing development. Therefore, implementation of the proposed General Plan would result in water demand-related impacts that are considered less than significant. The City's water treatment and conveyance infrastructure is adequate to serve existing demand, in addition to the demand created by the proposed project. Therefore, this is a **less-than-significant impact**.

Responses d), e): Less than Significant. Glenn County prepared the required Source Reduction and Recycling Element (SRRE) and Household Hazardous Waste Element (HHWE) in 1992. Glenn County leases and operates a landfill located at the west end of County Road 33 off Interstate 5 in Artois. Orland residents can contract individually with Waste Management for curbside waste and recycling collection services. Orland area waste is delivered to the Glenn County Landfill by Waste Management.

The proposed project would not generate significant volumes of solid waste, beyond levels normally found in commercial developments. Using CalRecycle's commercial use solid waste generation rate of 5 pounds per 1,000 sf per day, the project is expected to produce a maximum

of approximately 8,058 pounds per day. The addition of the solid waste generated by the project would not exceed the capacity of the local landfills.

As described above, there is adequate landfill capacity to serve the proposed project, and the project will comply with all applicable statutes and regulations related to solid waste. This is a **less-than-significant impact**.

XX. WILDFIRE

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?			X	
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?			X	
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?			X	
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?			X	

EXISTING SETTING

The risk of wildfire is related to a variety of parameters, including fuel loading (vegetation), fire weather (winds, temperatures, humidity levels and fuel moisture contents) and topography (degree of slope). Steep slopes contribute to fire hazard by intensifying the effects of wind and making fire suppression difficult. Fuels such as grass are highly flammable because they have a high surface area to mass ratio and require less heat to reach the ignition point, while fuels such as trees have a lower surface area to mass ratio and require more heat to reach the ignition point.

RESPONSES TO CHECKLIST QUESTIONS

Responses a), b), c), d): Less than Significant. The proposed project is not located within a State Responsibility Area (SRA) or Local Responsibility Area (LRA).⁶ Overall, the project site is not located within a designated wildfire hazard area.

Moreover, the proposed project would require building construction to meet the fire code requirements, and would have fire hydrants consistent with the standards of the City; such fire hydrants would assist with fire suppression efforts if a fire was to occur on or near the project site. Additionally, there are no steep slopes on or near the project site. Development of the project would not exacerbate fire risks. Furthermore, development within the project site would require fire hydrants consistent with the standards of the City, and such fire hydrants would assist with fire suppression efforts if a fire was to occur. The proposed infrastructure improvements would

⁶ <https://www.glenncountyrca.org/files/9a9d8cabb/Map+B.pdf>

allow for decreased fire risk relative to existing conditions. The proposed project would also require the installation of storm drainage infrastructure to ensure that storm waters properly drain from the project site and does not result in downstream flooding or major drainage changes. The storm drainage plan would be designed and engineered to ensure proper construction of storm drainage infrastructure to control runoff and prevent flooding, erosion, and sedimentation. Overall, impacts related to wildfire would be considered **less-than-significant impact**.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			X	
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)?			X	
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

RESPONSES TO CHECKLIST QUESTIONS

Response a): Less than Significant. As described throughout the analysis above, the proposed project would not result in any significant impacts that would substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal to the environment.

All potentially significant impacts related to plant and animal species would be reduced to a less-than-significant level through the application of uniformly applied development policies and/or standards. The proposed project is required to implement a range of standard and uniformly applied development policies and standards, most of which are identified in the Orland General Plan, which would reduce any potentially significant impacts to a less than significant level. The cumulative impacts associated with development of the project were considered, analyzed and disclosed in the City of Orland General Plan and General Plan EIR. On February 21, 2012 the Orland City Council adopted a Statement of Overriding Considerations (Resolution No. 2012-01) for all significant impacts resulting from adoption of the General Plan. The project would not result in any cumulative impacts that were not contemplated in the General Plan EIR. The project would not result in any peculiar site-specific impacts, impacts to biological resources or impacts to cultural and/or historical resources.

The proposed project would implement requirements aimed at reducing stormwater pollutants and runoff, as well as through compliance of various state, regional and local standards. Through the application of uniformly applied development policies and/or standards, the project would

not result in any cumulative impacts related to biological resources. Therefore, these are **less-than-significant impacts**.

Response b): Less than Significant. The General Plan EIR assumed full development and buildout of the project site, consistent with the use and density proposed by the project. The cumulative impacts associated with buildout of the City of Orland General Plan, including the project site, were fully addressed in the General Plan EIR. Additionally, as described throughout the analysis above, the proposed project would not result in any significant individual or cumulative impacts that would not be reduced to less than significant levels through the application of uniformly applied development policies and/or standards. Therefore, this is considered a **less-than-significant impact**.

Response c): Less than Significant. As described throughout the analysis above, the proposed project would not result in any significant impacts that would have environmental effects which will cause substantial adverse effects on humans. The analysis in the relevant sections above provides the application of uniformly applied development policies and/or standards reduce any potentially significant impacts on humans to less than significant levels. A variety of requirements including those related to cultural resources, seismic hazards, water pollution and water quality, and noise, ensure any adverse effects on humans are reduce to an acceptable standard. Therefore, this is considered a **less-than-significant impact**.

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