City of Wheatland
Community Development Department

Caliterra Ranch Amendment Project

Addendum to a Certified Mitigated Negative Declaration

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Prepared by

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ADDENDUM TO AN ADOPTED INITIAL STUDY/NEGATIVE DECLARATION

The City of Wheatland, California, does hereby prepare, make, declare, and publish the Addendum to an adopted Initial Study/Mitigated Negative Declaration (IS/MND) for the following described project:

Project Name: Caliterra Ranch Amendment Project

Original Project: Jones Ranch Project (SCH #2005082035)

Project Background

The Jones Ranch Project was evaluated pursuant to CEQA through the preparation and circulation of a program-level Draft and Final Environmental Impact Report (EIR). The City certified the Jones Ranch Project EIR in 2002 (SCH #2001012094), hereafter referred to as the "2002 EIR." The 2002 EIR programmatically evaluated the Jones Ranch Project, which included the annexation of the approximately 191-acre site within Yuba County into the City of Wheatland city limits, as well as the future development of 552 single-family residences. The Jones Ranch Project also included the annexation of an additional 31 acres ("Island Property") into the City of Wheatland city limits and development of 50 residential units on that site. The Caliterra Ranch (formerly Jones Ranch) Project site is located southwest of the intersection of Wheatland Park Drive/Wheatland Road and Olive Street in the City of Wheatland, California (see Figure 1 and Figure 2). The approximately 191-acre site (identified as Assessor's Parcel Numbers [APNs] 015-180-128 through -150 and 015-850-001 through -55) is bisected by Oakley Lane.

Subsequent to the 2002 EIR, the City received a tentative map application for Jones Ranch and prepared a project-level IS/MND in 2005 (SCH #2005082035) to evaluate the environmental impacts of development of such, hereafter referred to as the "2005 IS/MND." The 2005 IS/MND tiered from the analysis of the 2002 EIR, pursuant to CEQA Section 15063(c)(3)(D). The 2005 IS/MND evaluated the development of 552 dwelling units within eight residential villages on the 191-acre project site. The Jones Ranch Project required approval of a Large Lot Tentative Subdivision Map (TSM) to subdivide the site into two parcels, as well as a Small Lot TSM to subdivide the site into 552 single-family lots and additional lots for commercial and public uses. The Small Lot TSM included 129 acres designated for low-density residential uses; 2.4 acres for parkland uses; 10 acres for elementary school uses; 8.1 acres for expansion of the adjacent Wheatland Union High School; 2.5 acres of commercial uses; 17.1 acres of open space/drainage corridors; a 6.4-acre detention basin; 0.6-acre well site; 1.9-acre pedestrian paseo/tot lot; 10.3 acres for major roadways; and 0.2-acre for a sewer lift station.

Since the City approved the Caliterra Ranch (formerly Jones Ranch) Project and adopted the 2005 IS/MND, a number of improvements to the site have occurred, including some grading within the eastern portion of the site, and Villages 1 and 2 within the north-central portion of the site are currently under construction. The remainder of the site is undeveloped, with the exception of a barn on the western portion of the site.

Figure 1
Regional Project Location

Figure 2
Approved Caliterra Ranch Project Site Boundaries

Project Location and Setting

The Caliterra Ranch Project (proposed project) site consists of approximately 132.3 acres of the approved Jones Ranch Project site and is located southwest of the intersection of Wheatland Park Drive/Wheatland Road and Olive Street in the City of Wheatland, California (see Figure 3).

The project site is identified as APNs 015-180-128 through -133, -137, -138, -141 through -144, -146 through -148, and -150. As noted above, the site is currently undeveloped, with the exception of an existing barn on the western portion of the site. Existing orchards currently exist within the western portions of the site as well.

The site is currently surrounded by single-family residences, undeveloped land, a church, and a school to the north, across Wheatland Road; undeveloped land, single-family residences, and the Wheatland Union High School athletic track and baseball fields to the east; and agricultural uses to the south and west. The City of Wheatland General Plan designates the site as Low Density Residential and the site is zoned Planned Development (PD).

Project Description

The proposed project would include modification of the existing Caliterra Ranch Project to include an additional 68 single-family lots, which would increase the total number of single-family lots from the previously approved Caliterra Ranch Project of 552 to 620 (see Figure 4). Residential lot sizes would range from 5,775 square feet (sf) to 12,993 sf.

The proposed project would include additional alterations to the previously approved Caliterra Ranch Project, primarily related to roadway design. For example, the proposed project would remove a planned roundabout at the Wheatland Park Drive/Street C intersection and would instead include a traditional three-way Wheatland Park Drive/First Street intersection located closer to the eastern project boundary, adjacent to Wheatland High School. The proposed project would also include upsizing the previously approved sewer lift station to accommodate future buildout of the project site, expansion of the previously approved basin in the eastern portion of the site from 6.4 acres to 13.8 acres, and construction of a new basin within the western portion of the site to provide treatment and retention for stormwater associated with the villages west of Oakley Lane.

Water and sewer would be provided by the City of Wheatland through a network of new water and sewer lines (see Figure 5). A network of new eight- to 12-inch water lines would connect to the existing 12-inch water main within Wheatland Road. A new network of eight-inch sewer lines would direct wastewater flows to the previously approved sewer lift station in the center of the site, which is proposed to be upsized to accommodate the additional residential units proposed as part of the project. The sewer lift station would pump wastewater flows through an existing six-inch force main, ultimately connecting to the Malone Lift Station.

With respect to stormwater, a new network of 12- to 42-inch storm drain pipes are proposed to be installed throughout the project site to capture flows and direct stormwater into either the previously approved on-site basin or the second, currently proposed, on-site basin (see Figure 6). Both basins would be sized such that pre-development stormwater flows associated with the site would not be exceeded and that adequate water quality treatment would be provided. Electricity and natural gas would be provided to the project site by the Pacific Gas & Electric Company (PG&E).

Figure 3
Caliterra Ranch Amendment Project Site Boundaries Map

Figure 4
Proposed Tentative Subdivision Map Amendment

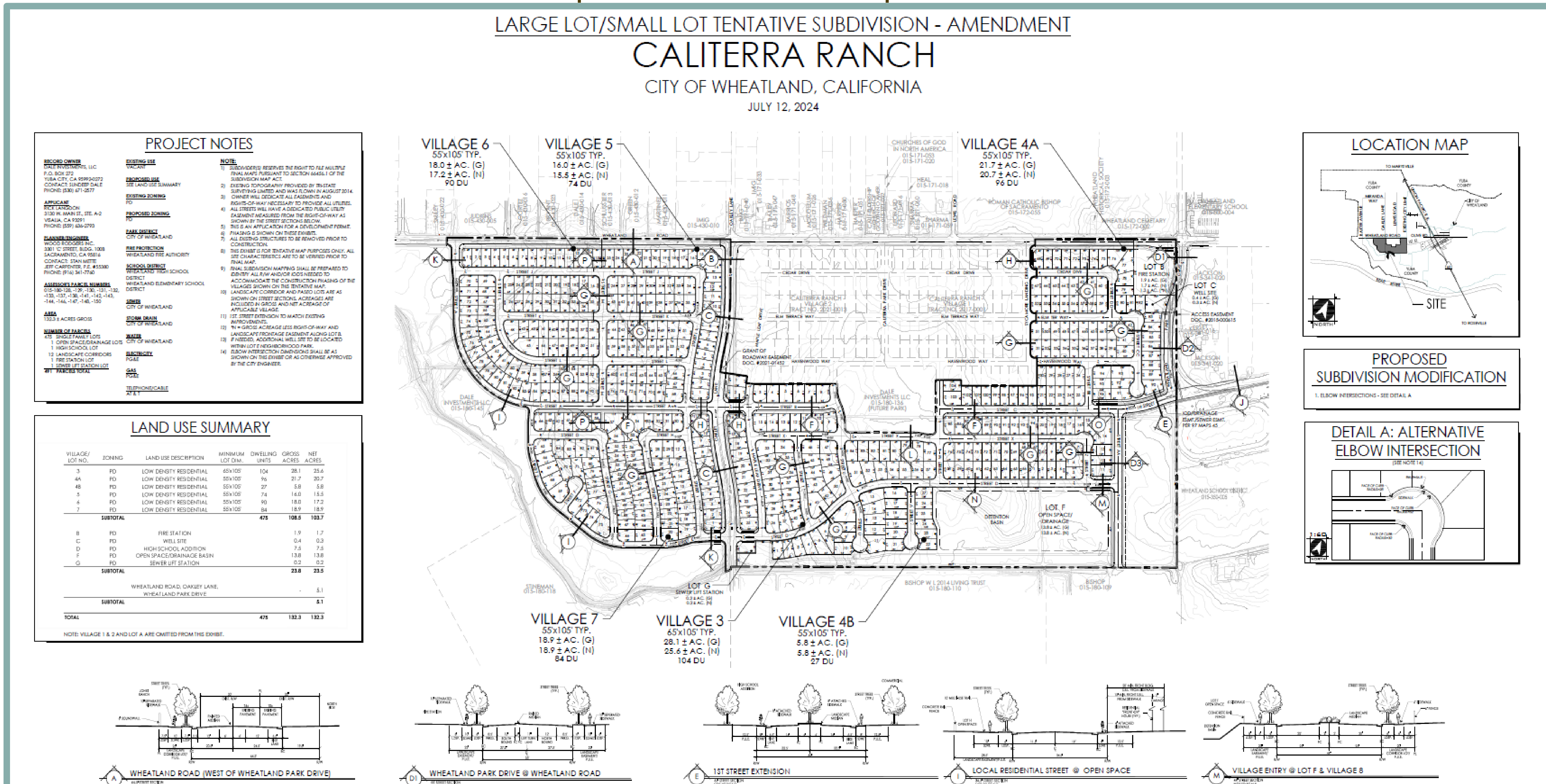

Figure 5
Sewer and Water Plan

Figure 6
Grading and Drainage Plan

Ground disturbance associated with the proposed project would include, but not be limited to, site preparation, grading, trenching for utilities, paving, and building construction. All such ground disturbing activities would occur within the same development footprint as the previously approved project.

The proposed project would require City approval of a Tentative Subdivision Map Amendment.

Rationale for the Preparation of an Addendum

In determining whether an addendum is the appropriate document to analyze the modifications to the project and its approval, CEQA Guidelines Section 15164 (Addendum to an EIR or Negative Declaration) states:

> (a) The lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.
>
> (b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.
>
> (c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
>
> (d) The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.
>
> (e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's required findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

In the case of a project proposal requiring discretionary approval by the City for which the City has adopted an EIR or negative declaration for the overall project, the City must determine whether a subsequent EIR or negative declaration is required. The CEQA Guidelines provide guidance in this process by requiring an examination of whether, since the certification of the EIR or negative declaration, changes in the approved project or circumstances under which the approved project would be undertaken have occurred to such an extent that the proposal may result in a new significant impact (not previously identified in the certified EIR or negative declaration) or substantial increase in the severity of a previously identified significant impact. If so, the City would be required to prepare a subsequent EIR or negative declaration. The examination of impacts is the first step taken by the City in reviewing the CEQA treatment of the project. The following review proceeds with the requirements of CEQA Guidelines Section 15162 as discussed in detail below.

According to CEQA Guidelines Section 15164(b), an addendum may be prepared if only minor technical changes or additions to the previous EIR are necessary or if none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR have occurred. The following identifies the standards set forth in Section 15162(a):

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

    a) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

    b) Significant effects previously examined will be substantially more severe than shown in the previous EIR [or negative declaration];

    c) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

    d) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Given the limited scope of changes to the project, this Addendum provides a detailed evaluation of those select CEQA topics most affected by the changes, whereas the remaining CEQA topics are appropriately discussed at a lesser level of detail. If changes or new information involve new impacts, additional mitigation measures, if available and feasible, are listed under each environmental category. It should be noted that under California Code of Regulations (CCR) Section 15162(a)(1), the requirements to prepare a subsequent or supplemental EIR are triggered when substantial changes are proposed that will require major revisions of the previous EIR. Such language implies that a new or revised mitigation measure that does not require a major revision could be adopted on the basis of an addendum, rather than a supplemental EIR. Similarly, the provisions of CCR Section 15162(a)(3)(c-d) require a further EIR only if newly feasible or considerably different mitigation becomes available but is not adopted. Such provisions also imply that newly feasible or different mitigation can be adopted based on an addendum without the need for a supplemental EIR. All additional mitigation measures included herein will be included as project conditions to address project-specific impacts. The project applicant has agreed in advance to accept all such mitigation measures.

The following discussion confirms that the project has been evaluated for significant impacts pursuant to CEQA. The determination in this document is that the project's impacts have been considered in a previous CEQA document (i.e., the 2005 IS/MND) that was adopted by the City of Wheatland and deemed a sufficient and adequate analysis of the environmental impacts of the Jones Ranch Project. The discussion concludes that the conditions set forth in Section 15162 are not triggered by the modified project. As such, an addendum is the appropriate environmental document for the proposed project, pursuant to CEQA Guidelines Section 15164.

Use of a Prior Environmental Document

In *Friends of College of San Mateo Gardens v. San Mateo County Community College District* (2016) 1 Cal.5th 937, 951, the California Supreme Court held that a lead agency, in considering a proposed change to a previously-approved project, has the responsibility for deciding whether the environmental document for the original project retains "some relevance" to the decision-making process for the proposed change. "[W]hether an initial environmental document remains relevant despite changed plans or circumstances—like the question whether an initial environmental document requires major revisions due to changed plans or circumstances—is a predominantly factual question. It is thus a question for the agency to answer in the first instance, drawing on its particular expertise." (*Id.* at p. 952.) On this factual issue, lead agencies are entitled to considerable deference from reviewing courts: "'a court should tread with extraordinary care' before reversing an agency's determination, whether implicit or explicit, that its initial environmental document retains some relevance to the decision-making process." (*Id.* at p. 953.)

Here, considering the thoroughness of the adopted 2005 IS/MND, which tiered from the analysis of the 2002 EIR, and the nature of the underlying project approved in 2005, the City of Wheatland has determined that the IS/MND adopted for the Jones Ranch Project remains relevant to the proposal at hand. Based on the analysis set forth below, moreover, the City has also concluded that the proposed project change will not trigger the need for either a subsequent EIR or a supplement to the previously-adopted 2005 IS/MND. For these reasons, the City has prepared this addendum to the 2005 IS/MND in order to evaluate the proposed project. The proposed modifications would result in impacts similar to those identified in the 2005 IS/MND.

Discussion

The following sections provide discussions of potential impacts associated with the proposed project in comparison to those previously identified in the 2005 IS/MND. According to CEQA Guidelines Section 15164(b), an addendum may be prepared if only minor technical changes or additions to the previous analysis are necessary or if none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR have occurred. Given the limited scope of changes to the project, this Addendum provides a detailed evaluation of those select CEQA topics most affected by the changes, whereas the remaining CEQA topics are appropriately discussed at a lesser level of detail.

In cases where an approved project has already undergone environmental review and the environmental document has been certified or adopted by the lead agency, the lead agency can restrict the current review to the incremental effects of the modified project, rather than having to reconsider the overall impacts of the project. In such cases, as the project under review constitutes only a modification of a previously approved project, the "baseline" for the purposes of CEQA is adjusted such that the originally approved project is assumed to exist.[1] Therefore, the environmental baseline for this Addendum is appropriately considered to be the approved Jones Ranch Project.

Air Quality and Greenhouse Gas Emissions

The following includes an analysis of potential air quality and greenhouse gas (GHG) impacts associated with the proposed project in comparison to those identified in the 2005 IS/MND for the Jones Ranch Project.

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[1] See Michael H. Remy et al. *Guide to CEQA, 11th Edition*. Point Arena: Solano Press Books (2007), pg. 207; Stephen L. Kostka and Michael H. Zischke. *Practice Under the Environmental Quality Act, Second Edition* (Vol. 1). Oakland: Continuing Education of the Bar (2018), pgs. 12-32; *Benton v. Board of Supervisors* (1st Dist. 1991) 226 Cal. App. 3d 1467.

Criteria Pollutants

The project site is located in the City of Wheatland, which is within Yuba County and is under the jurisdiction of the Feather River Air Quality Management District (FRAQMD). According to the U.S. Environmental Protection Agency's (USEPA's) listing of Current Nonattainment Counties for All Criteria Pollutants, as of November 30, 2024, Yuba County is not listed among the counties in the U.S. currently designated as nonattainment for criteria pollutants.[2] As such, Yuba County is in attainment or unclassified for all federal ambient air quality standards. However, it is noted that the FRAQMD jurisdiction includes both Yuba County and Sutter County, and Sutter County is designated as nonattainment for several criteria pollutants. Specifically, the FRAQMD includes areas designated serious nonattainment and nonattainment-transitional for the State 1-hour ozone standard, nonattainment-transitional for the State 8-hour ozone and serious nonattainment for the federal 8-hour ozone standard, and nonattainment for the State standard for particles that are 10 micrometers in diameter or smaller (PM_{10}). As such, FRAQMD has adopted thresholds of significance intended to maintain attainment of federal and State air quality standards, particularly ozone precursors, reactive organic gas (ROG) and oxides of nitrogen (NO_X), and PM_{10}, which are summarized in Table 1, below.

Table 1
FRAQMD Thresholds of Significance

Pollutant	Construction Thresholds	Operational Thresholds
ROG	25 lbs/day multiplied by the project length, not to exceed 4.5 tons/year	25 lbs/day
NO_X	25 lbs/day multiplied by the project length, not to exceed 4.5 tons/year	25 lbs/day
PM_{10}	80 lbs/day	80 lbs/day

Note: Construction-related ROG and NO_X emissions may be averaged over the life of the project, but may not exceed 4.5 tons/year.

Source: FRAQMD, June 7, 2010.

The 2005 IS/MND assessed the potential for buildout of the Jones Ranch Project to result in impacts related to the generation of temporary, short-term construction-related emissions of criteria air pollutants, and the generation of long-term operational emissions of criteria pollutants. As discussed therein, the 2005 IS/MND used the program URBEMIS 7G, which was the recommended air quality model at the time and is now obsolete, to estimate emissions associated with construction of the Jones Ranch Project and concluded that construction activities associated with development of the Jones Ranch Project would exceed the FRAQMD thresholds for ROG emissions. Thus, the 2005 IS/MND included Mitigation Measure III-3, which required restrictions on certain types of volatile organic compound (VOC) emitting architectural coatings, to ensure impacts would be reduced to a less-than-significant level beyond what was addressed in the 2002 EIR.

In addition, with regard to operational emissions, the 2005 IS/MND concluded that as a result of trip generation increase, ROG and NO_X associated with the Jones Ranch Project would increase, exceeding the FRAQMD threshold of 25 pounds per day (lbs/day) for ROG and NO_X and resulting in a significant impact during the operation phase, consistent with the analysis and conclusions within the 2002 EIR. Therefore, the 2005 IS/MND included Mitigation Measure III-2, which requires the submittal of improvement plans by the developer for sidewalks, pedestrian paths, bike lanes, and bus turnouts. The 2005 IS/MND also referenced mitigation recommended by

[2] U.S. Environmental Protection Agency. *Green Book: Current Nonattainment Counties for All Criteria Pollutants*. Available at: https://www3.epa.gov/airquality/greenbook/ancl.html. Accessed December 2024.

FRAQMD for all projects, which were included in the 2002 EIR. The 2002 EIR identified a significant and unavoidable impact related to operational emissions and, thus, a statement of overriding considerations for such was adopted by the City. Because the tentative map evaluated in the 2005 IS/MND was consistent in scale and intensity with the development evaluated in the 2002 EIR, the 2005 IS/MND concluded that, with implementation of Mitigation Measure III-2, impacts would be reduced to a less-than-significant level beyond what was addressed in the 2002 EIR.

As described throughout this Addendum, the proposed project would include the modification of the existing Jones Ranch Project to include an additional 68 single-family lots, as well as roadway design and utility alterations. In order to determine whether the proposed project would result in new or more severe significant impacts as compared to what was assumed for the site in the 2005 IS/MND, emissions associated with the additional 68 single-family residences that would be developed on-site have been estimated using the California Emissions Estimator Model (CalEEMod) web-based Version 2022.1.1.29, which is the current industry standard air quality model. CalEEMod is the most up-to-date statewide model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify air quality emissions, including GHG emissions, from land use projects. The model applies inherent default values for various land uses, including construction data, trip generation rates, vehicle mix, trip length, average speed, compliance with the California Building Standards Code (CBSC), etc. Where project-specific data was available, such data was input into the model (e.g., construction phases and timing, inherent site or project design features, compliance with applicable regulations, etc.).

The modeling for the proposed project assumed the following:

- Construction would begin April 2025 and occur over approximately one year and eight months;
- Trip rates were adjusted to match the data included in the Traffic Report prepared by TJKM;
- None of the proposed 68 additional residences would include fireplaces;
- The proposed project would exceed current Title 24 energy efficiency standards by 15 percent;
- A total of 30 percent of the project's electricity use would be generated by on-site renewable sources (i.e., rooftop solar systems); and
- The proposed project would result in a 30 percent reduction in both indoor and outdoor water use as compared to current State regulations.

All CalEEMod results are included as Attachment A to this Addendum.

Construction Emissions

Table 2 presents the estimated unmitigated net increase in construction-related emissions associated with the additional 68 single-family residences, as compared to the FRAQMD thresholds of significance. Although the 2005 IS/MND used a significance threshold of 25 lbs/day for ROG and NO_X, as shown in Table 1, the FRAQMD's recommended threshold for construction-related emissions of ROG and NO_X is 25 lbs/day multiplied by the total length of the construction period of a project. Construction of the proposed project is anticipated to occur over approximately one year and eight months, for a total of approximately 400 days of construction (assuming 5 working days per week); thus, the maximum allowable total construction-related emissions of ROG and NO_X pursuant to the FRAQMD thresholds of significance would be 10,000 lbs over the entire construction period (400 days X 25 lbs/day = 10,000 lbs). However, the maximum allowable

total construction emissions of 10,000 lbs would equate to 5.0 tons, which exceeds the annual threshold of 4.5 tons/year. Therefore, this analysis applies 4.5 tons/year as the threshold of significance for construction-related ROG and NO_X emissions.

Table 2
Maximum Unmitigated Net Increase in Construction Emissions

Pollutant	Proposed Project Emissions Increase	Threshold of Significance	Exceeds Threshold?
ROG	1.00 tons/year	4.5 tons/year	**NO**
NO_X	1.53 tons/year	4.5 tons/year	**NO**
PM_{10}	21.2 lbs/day	80 lbs/day	**NO**
Source: CalEEMod, December 2024 (see Attachment A).			

As shown in Table 2, the total net increase in construction-related emissions associated with the proposed project would be well below the applicable thresholds of significance for all criteria pollutants. In addition, the net increase in construction emissions would be relatively minor as compared to what was anticipated for buildout of the site in the 2005 IS/MND. For example, the 2005 IS/MND anticipated that buildout of the Jones Ranch Project would generate 218.25 lbs/day of ROG, whereas construction of the additional 68 units associated with the proposed project is anticipated to generate a daily unmitigated maximum of 8.17 lbs/day of ROG. Furthermore, regulations associated with construction-related emissions (i.e., off-road equipment engine restrictions, on-road vehicle requirements, etc.) have become much more stringent since the 2005 IS/MND was adopted and, thus, construction related to the proposed project would be expected to result in fewer emissions than what was anticipated in the previous analysis. Nonetheless, to ensure construction-related emissions associated with the proposed project would be reduced to a less-than-significant level beyond that addressed in the 2005 IS/MND, Mitigation Measure III-3 of the 2005 IS/MND would still be required.

In addition, the proposed project is required to comply with all FRAQMD rules and regulations, including Rule 3.0 related to visible emissions and Rule 3.2 related to particulate matter concentration. All projects under the jurisdiction of the FRAQMD are also recommended to implement the following Standard Construction Mitigation Measures provided in the FRAQMD's Indirect Source Review Guidelines:

1. Implement the Fugitive Dust Control Plan.
2. Construction equipment exhaust emissions shall not exceed FRAQMD Regulation III, Rule 3.0, Visible Emissions limitations (40 percent opacity or Ringelmann 2.0).
3. The contractor shall be responsible to ensure that all construction equipment is properly tuned and maintained prior to and for the duration of on-site operation.
4. Limiting idling time to five minutes.
5. Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators.
6. Develop a traffic plan to minimize traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through-traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites.
7. Portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, may require California Air Resources Board (CARB) Portable Equipment Registration with the State or a local district

permit. The owner/operator shall be responsible for arranging appropriate consultations with the CARB or FRAQMD to determine registration and permitting requirements prior to equipment operation at the site.

The City would require the foregoing FRAQMD Standard Construction Mitigation Measures be implemented during construction, and be included in all construction contracts, as a condition of approval, which would further help reduce criteria pollutant emissions during project construction.

Operational Emissions

Table 3 presents the estimated unmitigated net increase in operational emissions associated with the additional 68 single-family residences, as compared to the applicable FRAQMD thresholds of significance. As shown in the table, the proposed project's maximum unmitigated net increase in operational criteria pollutant emissions would be below the applicable FRAQMD thresholds of significance. In addition, the net increase in operational emissions would be relatively minor as compared to what was anticipated for operation of the Jones Ranch Project in the 2005 IS/MND. For example, the 2005 IS/MND anticipated that, even with implementation of mitigation, operation of the Jones Ranch Project would generate 63.26 lbs/day of NO_X, whereas operation of the additional 68 units associated with the proposed project is anticipated to generate a daily unmitigated maximum of 6.84 lbs/day of NO_X. Furthermore, regulations associated with operation-related emissions, including, but not limited to, Building Energy Efficiency Standards and State and federal vehicle standards, have become much more stringent since the 2005 IS/MND was adopted and, thus, operation of the proposed project would be expected to result in fewer emissions as compared to what was anticipated in the previous analysis.

Table 3
Maximum Unmitigated Net Increase in Operational Emissions

Pollutant	Proposed Project Emissions Increase (lbs/day)	Threshold of Significance (lbs/day)	Exceeds Threshold?
ROG	9.81	25 lbs/day	**NO**
NO_X	6.84	25 lbs/day	**NO**
PM_{10}	10.1	80 lbs/day	**NO**

Source: CalEEMod, December 2024 (see Attachment A).

Although the proposed project would result in a slight increase in operational emissions from what has been anticipated for buildout of the site, as noted above, the 2002 EIR identified a significant and unavoidable impact related to operational emissions and a statement of overriding considerations for such was adopted by the City. The 2005 IS/MND tiered from the analysis of the 2002 EIR and concluded that, with implementation of Mitigation Measure III-2, impacts would be reduced to a less-than-significant level beyond what was addressed in the 2002 EIR. Similarly, with implementation of Mitigation Measure III-2 included in the 2005 IS/MND, the proposed project would not be considered to result in a new or more severe significant impact than previously identified in the 2005 IS/MND related to operational emissions.

GHG Emissions

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. Therefore, the cumulative global emissions of GHGs contributing to global climate change can be attributed to every nation, region, and city, and virtually every individual on Earth. A project's GHG emissions are at a micro-scale relative to global emissions, but could result

in a cumulatively considerable incremental contribution to a significant cumulative macro-scale impact.

A number of regulations currently exist related to GHG emissions, predominantly Assembly Bill (AB) 32, Senate Bill (SB) 32, and Executive Order (EO) B-55-18, which establish statewide targets of reducing the State's GHG emissions; the most stringent being EO B-55-18, a statewide policy for California to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net-negative emissions thereafter. On September 16, 2022, AB 1279, also known as the California Climate Crisis Act, codified the carbon neutrality goal established by EO B-55-18. In order to implement the statewide GHG emissions reduction targets, local jurisdictions are encouraged to prepare and adopt area-specific GHG reduction plans and/or thresholds of significance for GHG emissions.

An evaluation of GHG emissions was not required pursuant to CEQA at the time of preparation of the 2005 IS/MND and, as a result, GHG emissions were not directly addressed therein. However, potential impacts related to GHG emissions do not constitute "new information" as defined by CEQA, considering GHG emissions were known as a potential environmental issue since before the 2005 IS/MND was circulated.[3]

Since the time the 2005 IS/MND was approved, the City has taken numerous actions towards promoting sustainability within the City, including efforts aimed at reducing GHG emissions. On December 11, 2018, the City of Wheatland City Council adopted a Climate Action Plan (CAP) to establish consistency between the City of Wheatland's policies and the State's mandated GHG reduction requirements.[4] The ultimate goal of the CAP is to achieve the identified reductions in emissions by the target years of 2030 and 2050. Reduction targets in the CAP call for a 65.7 percent reduction below baseline 2010 levels of GHG emissions by 2030. Based upon the aforementioned GHG reduction goals, the City of Wheatland has identified and quantified GHG emissions reduction strategies, which include climate change adaptation strategies, measures, and actions. The City's CAP serves as a Qualified GHG Reduction Strategy under Section 15183.5 of the CEQA Guidelines, simplifying development review for new projects that are consistent with the CAP. Specifically, projects showing consistency with the CAP reduction strategies are considered to have a less-than-significant GHG emissions impact.

The proposed project's consistency with the reduction strategy actions in the CAP is assessed in Table 4 below.

Table 4
CAP Consistency Checklist

Sustainability Checklist Requirements	Project Consistency
Does the project include bicycle, pedestrian, and/or transit infrastructure?	As required by Mitigation Measure III-3 of the 2005 IS/MND, in conjunction with the submittal of improvement plans, the developer would submit plans which indicate sidewalks and pedestrian paths designed for the safety of pedestrians, pedestrian signalization and signage where appropriate, bike lanes, and bus turnouts should transit service become available in that area. As such, compliance with Mitigation

(Continued on next page)

[3] As explained in a series of cases, most recently in *Concerned Dublin Citizens v. City of Dublin (2013) 214 Cal. App. 4th 1301*. Also see, *Citizens of Responsible Equitable Development v. City of San Diego (2011) 196 Cal.App.4th 515*.

[4] City of Wheatland. *City of Wheatland Climate Action Plan*. October 2018.

Table 4
CAP Consistency Checklist

Sustainability Checklist Requirements	Project Consistency
	Measure III-3 of the 2005 IS/MND would ensure the proposed project is consistent with this measure.
Are at least 25 percent of all proposed roadways and intersections designed with traffic calming and congestion management measures?	The current site plans for the proposed project do not indicate the inclusion of traffic calming and congestion management infrastructure. However, implementation of Mitigation Measure GHG-1 would require that the project applicant submit proof of compliance with this measure.
Does the project include Electric Vehicle charging infrastructure and parking spaces as required by State or City standards?	All on-site residences would be subject to the single-family residential off-street electric vehicle (EV) requirements included in the 2022 California Green Building Standards Code (CALGreen Code). The 2022 CALGreen Code requires all single-family residences, townhomes, and duplexes be EV capable (i.e., each dwelling unit must have a listed raceway to accommodate a dedicated 208/40-volt branch circuit), which would be suitable for EV charging. Compliance with the 2022 CALGreen Code would ensure the proposed project is consistent with this measure.
Does the project include landscaping meeting the City or State's requirements for water efficient landscaping, including the planting and maintenance of trees?	Pursuant to City of Wheatland Municipal Code Section 18.60.130(E), property owners or their building or landscape designers, including anyone requiring a building or planning permit, plan check, or landscape design review from the City, who are constructing a new (single-family, multifamily, public, institutional, or commercial) project with a landscape area greater than 500 sf shall comply with the requirements of the Model Water Efficient Landscape Ordinance (MWELO), as contained in 23 CCR, Division 2, Chapter 2.7. Thus, the proposed project would be required to comply with the MWELO, and, therefore, would be consistent with this measure.
If the project is located within a designated safe route to school, does the project include infrastructure supporting alternative transportation to school? Such infrastructure may include bicycle infrastructure (i.e. bicycle parking, bicycle lanes, bicycle paths) sidewalks, raised or signalized cross-walks, or areas for school busses to stop.	The project site is not located within a designated safe route to school. Thus, this measure is not applicable to the proposed project. Furthermore, all proposed bicycle, pedestrian, and transit infrastructure improvements will be required to include proper signage to ensure the safety of students in the area.
Does the project meet the requirements of the California Building Energy Efficiency Standards?	The proposed project would be required to comply with the California Building Energy Efficiency Standards and would exceed current Title 24 energy efficiency standards by 15 percent; thus, the proposed project would comply with this measure.
Does the project meet the requirements of the CALGreen Code?	The proposed project would be required to comply with the CALGreen Code; thus, the proposed project would comply with this measure.
Does the project include high efficiency lighting, such as LED lighting in outdoor spaces?	The proposed project would be required to comply with the California Building Energy Efficiency Standards and the CALGreen Code, which require such high efficiency lighting. Compliance with such would ensure consistency with this measure.

(Continued on next page)

Table 4
CAP Consistency Checklist

Sustainability Checklist Requirements	Project Consistency
Does the project include water efficient fixtures?	The proposed project would be required to comply with the California Building Energy Efficiency Standards and the CALGreen Code, which require water efficient fixtures. In addition, the proposed project would result in a 30 percent reduction in both indoor and outdoor water use as compared to the current State regulations. Thus, the proposed project would comply with this measure.
Does the project include the provision of recycling and green waste service?	Pursuant to City of Wheatland Municipal Code Chapter 8.14, refuse pickup, including recyclables, lawn and garden refuse, and trimmings from trees or shrubs, plants, or similar materials, is mandatory. The owner of any property within the areas in or from which refuse is created, accumulated or produced shall subscribe to and pay for refuse collection service to be rendered to such property by the collector. Thus, the proposed project would be required to include the provision of recycling and green waste service, and would comply with this measure.

Source: City of Wheatland Climate Action Plan, October 2018.

As demonstrated in Table 4, the proposed project would be consistent with the majority of the applicable City CAP requirements. However, Mitigation Measure GHG-1 would be required to ensure the project compliance with the City's CAP. Therefore, with implementation of new project-specific Mitigation Measure GHG-1, the proposed project would result in a less-than-significant impact related to GHG emissions.

Conclusion

Overall, implementation of the mitigation measures listed below would ensure the proposed project would not result in any additional significant impacts or more severe significant impacts related to air quality as compared to the 2005 IS/MND, and that impacts related to GHG emissions would be reduced to a less-than-significant level.

2005 IS/MND Mitigation Measures

The following mitigation measures from the 2005 IS/MND would be applicable to the proposed project:

III-2 *In conjunction with the submittal of improvement plans, the developer shall submit plans which indicate sidewalks and pedestrian paths designed for the safety of pedestrians, pedestrian signalization and signage where appropriate, bike lanes, and bus turnouts should transit service become available in that area.*

III-3 *At the time of building permit submittal, the applicant shall provide measures to reduce emission caused by coated structures by using the following coatings:*

a) Architectural coatings used in the interior of the structures should have a VOC emissions rate of 0 grams per liter. Examples of non-VOC emitting architectural coatings are Benjamin Moore's Pristine EcoSpec system of coatings, and Sherwin Williams HealthSpec series of coatings. Other brands of non-VOC emitting architectural coatings may be used.

b) Architectural coatings used on the exterior of the structure should have a VOC emissions rate of 75 grams per liter or less. An example of low-VOC emitting exterior architectural coating is Sherwin Williams Tough One series of coatings. Other brands of low-VOC emitting architectural coatings may be used.

Modified Mitigation Measures
None required.

New Mitigation Measures
The following project-specific mitigation measure would apply to the proposed project and has been agreed to by the project applicant:

GHG-1 *Prior to approval of project Improvement Plans, proof of compliance with the following sustainability measure listed in the City CAP's Sustainability Checklist shall be submitted to the City of Wheatland Community Development Department for review and approval:*

- *At least 25 percent of all proposed roadways and intersections shall be designed with traffic calming and congestion management measures. Such measures could include, but shall not be limited to, the following:*
  - *Raised median islands;*
  - *Marked crosswalks;*
  - *Count-down signal timers;*
  - *Curb extensions;*
  - *Raised crosswalks;*
  - *Raised intersections;*
  - *Median islands;*
  - *Chicanes/chokers;*
  - *Rumble strips;*
  - *Roundabouts or mini-circles;*
  - *Speed tables;*
  - *Tight corner radii;*
  - *On-street parking; and*
  - *Planter strips with street trees.*

Biological Resources
The 2005 IS/MND evaluated potential impacts of the Jones Ranch Project related to biological resources and concluded that impacts to special-status wildlife species, aquatic resources, sensitive natural communities, and oak woodland removal could occur. However, with implementation of the mitigation measures set forth therein, the 2005 IS/MND concluded that impacts would be reduced to a less-than-significant level.

The following includes an analysis of potential biological resources impacts associated with the proposed project in comparison to those identified in the 2005 IS/MND for the Jones Ranch Project.

Special-Status Species
With respect to special-status species, the 2005 IS/MND concluded that buildout of the Jones Ranch Project would have the potential to impact valley elderberry longhorn beetle (VELB), vernal pool fairy shrimp and vernal pool tadpole shrimp, western spadefoot, western burrowing owl,

Swainson's hawk, loggerhead shrike, and raptor and migratory birds protected under the federal Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC). The 2005 IS/MND concluded that, with implementation of the mitigation measures set forth therein, the impacts would be reduced to less-than-significant levels.

Current conditions in the western portion of the site are generally consistent with the existing conditions assumed in the 2005 IS/MND analysis, and the portion of the site west of Oakley Lane continues to be subject to regular disturbance associated with ongoing agricultural operations. The portion of the site located east of Oakley Lane has been subject to heavy disturbance since the certification of the 2005 IS/MND, primarily associated with grading and development for Villages 1 and 2. As such, special-status plant and wildlife species are not anticipated to occur on-site.

Nonetheless, a query was conducted of the California Natural Diversity Database (CNDDB) for the U.S. Geological Survey (USGS) quadrangle in which the project site is located (Wheatland), as well as the eight contiguous quadrangles (Sheridan, Olivehurst, Camp Far West, Nicolaus, Lincoln, Verona, Pleasant Grove, and Roseville), to determine the potential for special-status plant and wildlife species not previously identified to occur within the project site vicinity and greater regional vicinity.

Based on the results of the CNDDB query, all of the species identified in the 2005 IS/MND still have the potential to occur on-site. As such, Mitigation Measures IV-4, IV-5, IV-6a, IV-6b, IV-7a, IV-7b, IV-8, and IV-9 remain applicable to the proposed project. In addition, two special-status wildlife species not identified as having the potential to occur on or near the site in the 2005 IS/MND were identified in the CNDDB query: conservancy fairy shrimp and tricolored blackbird. Although conservancy fairy shrimp could occur within the vernal pool identified as part of the prior CEQA analysis in the western portion of the project site, only one occurrence of conservancy fairy shrimp has been recorded in the CNDDB query area in 2012, over 10 years ago, and was located several miles to the southeast, in Sheridan, California. Due to the low occurrence rate and the amount of time since conservancy fairy shrimp was identified in the project region, the species is unlikely to occur on-site and, thus, would not be impacted by the proposed project.

According to the 2005 IS/MND, a seasonal marsh is located in the center of the western portion of the site, south of the irrigated pasture. The on-site seasonal marsh represents marginally suitable habitat for tricolored blackbird. Therefore, the proposed project could result in impacts to tricolored blackbird if the species is present on-site during future construction activities. As such, the proposed project would be required to comply with new project-specific Mitigation Measure BIO-1, as presented below, which would ensure potential impacts to tricolored blackbird would be less than significant. Because the 2005 IS/MND already identified an impact related to special-status wildlife species and required associated mitigation, the proposed project would not result in a new or more severe significant impact from what was anticipated in the 2005 IS/MND.

Based on the above, with implementation of Mitigation Measures IV-4, IV-5, IV-6a, IV-6b, IV-7a, IV-7b, IV-8, and IV-9 from the 2005 IS/MND and the new project-specific Mitigation Measure BIO-1, the proposed project would not result in a new or more severe significant impact than previously identified in the 2005 IS/MND related to special-status species.

Aquatic Resources and Sensitive Natural Communities

According to the 2005 IS/MND, jurisdictional waters of the U.S. on-site include seasonal marsh (0.26 acres), intermittent drainage (0.50 acres), farmed wetland (0.03 acres), and vernal pool (0.01 acres). The U.S. Army Corps of Engineers (USACE) verified the foregoing water features

on August 17, 2001. The 2005 IS/MND concluded that implementation of Mitigation Measures IV-10a and IV-10b, which require the project applicant to obtain a Clean Water Act Section 404 permit and a Section 1600 Streambed Alteration Agreement, and implement all permit conditions, would reduce impacts related to wetlands to a less-than-significant level. Mitigation Measures IV-10a and IV-10b have already been completed and, therefore, are not applicable to the proposed project. The Lake and Streambed Alteration Agreement and associated permit conditions obtained from the CDFW through implementation of Mitigation Measure IV-10b are implemented on an ongoing basis. Because the proposed project would not expand the development footprint beyond what was analyzed in the 2005 IS/MND, the proposed project would not result in a new or more severe significant impact than previously identified in the 2005 IS/MND related to aquatic resources and sensitive natural communities.

Valley Oak Woodland Removal

In accordance with Mitigation Measure 4.11-10 of the 2002 EIR, an Arborist Report was prepared for the Jones Ranch Project and included in the 2005 IS/MND analysis. According to the analysis therein, the Arborist Report documented 62 trees on-site, 60 of which are native Valley Oak (*Quercus lobata*). The 2005 IS/MND determined that development of the project site could result in damage to the on-site trees and required implementation of Mitigation Measure IV-11, preparation and submittal of a tree mitigation and monitoring plan, to reduce impacts related to conflicting with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, to a less-than-significant level.

Because the proposed project would not expand the development footprint beyond what was analyzed in the 2005 IS/MND, and due to the disturbance of the site that has occurred since the 2005 IS/MND associated with agricultural operations and development of Villages 1 and 2, the proposed project would not result in any new or substantially more severe impacts from what was anticipated in the 2005 IS/MND related to a conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Conclusion

Overall, implementation of the mitigation measures listed below would ensure the proposed project would not result in any additional significant impacts or more severe significant impacts related to biological resources as compared to the 2005 IS/MND.

2005 IS/MND Mitigation Measures

Because the requirements of Mitigation Measures 10a and 10b from the 2005 IS/MND have already been completed, the measures do not apply to the proposed project. The following mitigation measures from the 2005 IS/MND would be applicable to the proposed project:

IV-4 *Where feasible, the project proponent shall avoid removal of the shrubs and maintain a 50-foot buffer around each shrub prior to grading. If creating a 50-foot barrier is not feasible, the project proponent shall obtain the appropriate ESA "take permit" from the USFWS that may require the implementation of one of the following measures:*

a) *Obtain credits from an approved mitigation bank; or*
b) *Transplantation of affected shrubs and plantings of elderberry seedlings and native companion plans.*

Prior to submission of any improvement plans, the City Engineer shall ensure that the implementation and continued effectiveness of the buffer is monitored.

IV-5 *Where feasible, the project proponent shall avoid removal of the wetlands, vernal pool, and seasonal marsh on the site by establishing setbacks for the habitats subject to approval of the USFWS. If avoidance is not feasible, the project proponent shall obtain the appropriate ESA take permit from the USFWS that may include the following measures:*

a) *Obtain credits from an approved mitigation bank; or*
b) *Complete an onsite mitigation and monitoring plant that includes onsite creation and preservation of these features.*

IV-6a *Prior to issuance of a grading permit, focused surveys shall be conducted, per USFWS and CDFG guidelines, by a qualified biologist in areas of potential species habitat. Surveys for spadefoot toad shall be conducted in accordance with USFWS guidelines and should be conducted during the months of May through November.*

IV-6b *If western spadefoot toad is not found on the site, further mitigation shall not be required. If this species is positively identified during the focused survey, then a detailed mitigation plan shall be prepared, in consultation with the USFWS and CDFG, that includes measures to avoid or minimize adverse effects of development on these species and their associated habitat. The mitigation plan shall incorporate a monitoring plan for this species during the period of construction. Potential mitigation measures include working in the breeding habitat outside of the breeding season, replacement and/or restoration of disturbed habitat, and monitoring of the construction site to ensure that spadefoot are not present in the work area.*

IV-7a *Prior to issuance of a grading permit, a qualified biologist shall conduct a pre-construction survey of all potential burrowing owl habitat within 250 feet of the project site and record the presence of individual burrowing owls, sign of burrowing owls, and all burrows that are in use by burrowing owl.*

IV-7b *If the pre-construction survey does not find any burrowing owl activity, further mitigation shall not be required. The following additional mitigation measures shall be implemented if burrowing owls are nesting within 250 feet of the project site:*

a) *Grading shall not be allowed during the nesting season (April – July), unless approved by the CDFG, within 250 feet of any nest burrow.*
b) *Prior to grading within burrowing owl habitat unoccupied burrows shall b collapsed to prevent occupation by burrowing owls subsequent to pre-construction surveys.*

A monitoring report of all activities associated with surveys for and passive relocation of burrowing owls shall be submitted to the CDFG no later than two weeks after the completion of grading that occurs within 250 feet of occupied nesting burrows.

IV-8 *The project proponent shall have a pre-construction nesting survey performed by a qualified biologist. The survey shall be conducted during Swainson's hawk nesting season (Late February – September). If any active Swainson's hawk*

nests are found, construction activities shall not occur within 500 feet of the nests until the young have fledged, as determined by a qualified biologist.

IV-9 *If construction is proposed during breeding season (February – August), a focused survey for active migratory bird nests shall be conducted within 30 days prior to the beginning of construction activities by a qualified biologist in order to identify active nests on the site. If active nests are found, construction activities shall not take place within 500 feet of the nest until the young have fledged. Trees containing nests that must be removed as a result of project implementation shall be removed during the non-breeding season (September to January). If active nests are not found during the focused survey, further mitigation shall not be required.*

IV-11 *Prior to the issuance of grading permits for the project site, the project proponent shall submit to the City of Wheatland Planning Department a tree mitigation and monitoring plan which shall replant trees on the project site or other locations as determined by city staff. Mitigation ratios for replacement shall occur at no less than one inch of tree preserved for every inch removed (1:1).*

Modified Mitigation Measures
None required.

New Mitigation Measures
The following project-specific mitigation measure would apply to the proposed project and has been agreed to by the project applicant:

BIO-1 *Within 30 days prior to the start of construction activities, a qualified biologist shall conduct a preconstruction survey for nesting tricolored blackbird on-site and within a 500-foot buffer around the project site. The results of the survey shall be submitted to the City of Wheatland Community Development Department. If active nesting colonies are not present, further measures are not necessary.*

If any active nesting colonies are observed, the nesting colony shall be designated a sensitive area and protected by an avoidance buffer of 500 feet, or as otherwise determined by the qualified biologist. The avoidance buffer shall be maintained until the qualified biologist has determined that the young have fledged and the colony is no longer active. Monitoring of active nesting colony shall be conducted by a qualified biologist during construction activities, and avoidance buffers may be adjusted if any agitated behavior by the nesting birds is observed.

Cultural and Tribal Cultural Resources
According to the 2005 IS/MND, historic or archeological resources were not identified on-site. The 2005 IS/MND also determined that, although some evidence of Nisenan tribal members may exist within the project site because Nisenan members may have traversed the project site while hunting or gathering food, Nisenan tribal members did not likely reside within the project area. Nonetheless, the 2005 IS/MND concluded that if cultural resources are found during ground-disturbing activities, a potentially significant impact could occur, and Mitigation Measure V-12, which establishes avoidance measures in the event of encountering historical resources, cultural resources, and/or human remains, was included to ensure impacts would be reduced to a less-than-significant level.

Since the adoption of the 2005 IS/MND, the CEQA Guidelines have been revised to include an evaluation of potential impacts related to tribal cultural resources. As such, although not specifically addressed in the 2005 IS/MND, the following analysis addresses potential impacts of the proposed project related to both cultural and tribal cultural resources.

In order to confirm that new or previously unidentified cultural or tribal cultural resources have not been recorded on-site or in the site vicinity since the certification of the 2005 IS/MND, a record search of the California Historic Resources Information System (CHRIS) was performed by the North Central Information Center (NCIC) for cultural resource site records and survey reports within the project area.[5] In addition, a records search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was conducted for the project site.[6] The CHRIS records search results state that, although the project site has a low potential for containing previously unrecorded archeological or historical resources, and does not contain historic sites eligible for the National Register of Historical Places and California Register of Historical Resources, the site has a high potential to contain previously unrecorded historic-period cultural resources. The NAHC SLF completed for the project site returned negative results, indicating that sacred tribal lands and/or tribal cultural resources are not known to exist on or near the project site. Furthermore, previously unrecorded cultural and tribal cultural resources have not been uncovered during the development of Villages 1 and 2.

Based on the above, new cultural and tribal cultural resources have not been discovered on-site since the 2005 IS/MND was adopted. In addition, the disturbance footprint associated with the proposed project would not change from what was analyzed in the 2005 IS/MND. Therefore, implementation of the mitigation measure listed below would ensure that the proposed project would not result in any new or substantially more severe impacts related to cultural resources as compared to the 2005 IS/MND.

2005 IS/MND Mitigation Measures

The following mitigation measure from the 2005 IS/MND would be applicable to the proposed project:

V-12 *In the event that any historic surface or subsurface archaeological features or deposits, including locally darkened soil (midden), that could conceal cultural deposits, animal bone, shell, obsidian, mortars, or human remains, are uncovered during construction, work within 100 feet of the find shall cease, and the City of Wheatland and a qualified archaeologist shall be contacted to determine if the resource is significant and to determine appropriate mitigation. Any artifacts uncovered shall be recorded and removed to a location to be determined by the archaeologist.*

Modified Mitigation Measures

None required.

New Mitigation Measures

None required.

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5 North Central Information Center. *Records Search Results for Caliterra Ranch Tentative Subdivision Map Project*. September 23, 2024.

6 Native American Heritage Commission. *Caliterra Ranch Tentative Subdivision Map Project, Yuba County*. October 1, 2024.

Transportation

The 2005 IS/MND identified a potentially significant impact related to exceeding an established level of service (LOS) standard, specifically associated with delays at intersections along SR 65, and required Mitigation Measure XV-29. The 2005 IS/MND acknowledged that the 2002 EIR identified significant and unavoidable impacts related to conflicts between the planned Bypass and other City streets, increased traffic volumes, and delays at intersections along SR 65, for which the City adopted a statement of overriding considerations. Because the tentative map evaluated in the 2005 IS/MND was consistent in scale and intensity with the development evaluated in the 2002 EIR, the 2005 IS/MND concluded that, with implementation of Mitigation Measure XV-29 and applicable mitigation measures set forth in the 2002 EIR, impacts would be reduced to a less-than-significant level beyond what was addressed in the 2002 EIR.

It should be noted that, since the release of the 2005 IS/MND, the law has changed with respect to how transportation-related impacts may be addressed under CEQA. Traditionally, lead agencies used LOS to assess the significance of such impacts, with greater levels of congestion considered to be more significant than lesser levels. LOS represents a qualitative description of the traffic operations experienced by the driver along a roadway segment or at an intersection and ranges from LOS A, which represents the absence of congestion and little delay, to LOS F, which signifies excessive congestion and delays. At the beginning of 2019, updated CEQA Guidelines went into effect, which require lead agencies such as the City of Wheatland to transition from using LOS to vehicle miles travelled (VMT) as the metric for assessing transportation impacts under CEQA (see Section 15064.3). Pursuant to CEQA Guidelines, any project that did not initiate CEQA public review prior to July 1, 2020 must use VMT rather than LOS as the metric to analyze transportation impacts. However, pursuant to the conclusions of *Olen Properties Corp. v. City of Newport Beach* (2023) (93 Cal.App.5th 270), when evaluating a project's consistency with a previously certified EIR, a document "may properly analyze traffic impacts under the old LOS methodology, and need not employ the newly mandated VMT methodology, when the previously certified EIR used the LOS methodology."[7] Because the 2005 IS/MND used LOS methodology, the analysis of transportation-related impacts within this Addendum is similarly based on the old LOS methodology.

As described throughout this Addendum, the proposed project would include modification of the existing Jones Ranch Project to increase the number of single-family lots by an additional 68, as well as roadway design and utility alterations. In order to determine whether the proposed project would result in new or more severe significant impacts related to transportation as compared to what was assumed for the site in the 2005 IS/MND, a Traffic Impact Study was conducted by TJKM (see Attachment B).[8] The Traffic Impact Study used the LOS methodology for comparison purposes to the 2005 IS/MND analysis. It is important to note that a project-specific LOS analysis was not conducted as part of the 2005 IS/MND, but, rather, the 2005 IS/MND relied on the analysis and conclusions of the 2002 EIR. The cumulative traffic conditions assumed in the 2002 EIR included a General Plan buildout year of 2020, other development outside of city limits, and long-range circulation system improvements, such as the SR 65 Bypass. Due to the existing conditions compared to the cumulative conditions assumed in the 2002 EIR analysis, as well as improvements to traffic analysis methodology and modeling since the 2002 EIR analysis, according to TJKM, the conditions assumed in the 2002 EIR's cumulative impact analysis are not

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7 Miller Star Regalia. *Fourth District Belatedly Publishes CEQA Opinion Upholding City of Newport Beach's Approval of Multifamily-Housing Development Pursuant To Addendum To 2006 EIR For Larger Mixed-Use Development*. Available at: https://www.ceqadevelopments.com/2023/08/08/fourth-district-belatedly-publishes-ceqa-opinion-upholding-city-of-newport-beachs-approval-of-multifamily-housing-development-pursuant-to-addendum-to-2006-eir-for-larger-mixed-use-development/. Accessed April 2024.

8 TJKM. *Traffic Impact Study: Caliterra Ranch Development, City of Wheatland, CA*. January 20, 2025.

analogous to the current traffic data. Nonetheless, the Traffic Impact Study provides a high-level comparison of the forecasted conditions presented in the 2002 EIR compared to current traffic conditions. The Traffic Impact Study also provides an updated cumulative analysis.

The following includes an analysis of potential transportation-related impacts associated with the proposed project in comparison to those identified in the 2005 IS/MND for the Jones Ranch Project.

Conflicts with Bypass and Other City Streets, and Increased Traffic Volumes

As stated above, the 2005 IS/MND acknowledged that the 2002 EIR identified significant and unavoidable impacts related to conflicts between the planned Bypass and other City streets and increased traffic volumes on SR 65, for which the City adopted a statement of overriding considerations. The 2002 EIR included Mitigation Measure 4.4-1, which required the applicant to submit a traffic impact fee study identifying "appropriate future street and circulation system improvements to mitigate the traffic impacts and to determine and substantiate revised city road circulation/traffic development fee or fees for the proposed project, and other potential development projects with the city and the city sphere of influence."

The Traffic Impact Study conducted by TJKM used the Institute of Transportation Engineers' (ITE) Trip Generation Manual, 11th Edition's published trip generation rates for the ITE Land Use Code (LUC) 210 (Single-Family Detached Housing) to estimate trips generated by the proposed project in comparison to the trip generation anticipated for the Jones Ranch Project. The proposed additional 68 dwelling units are expected to generate approximately 641 net new vehicle trips during a typical weekday, including 48 AM peak hour trips and 64 PM peak hour trips. The net new trips generated by the proposed project, combined with the previously forecasted trips from 552 dwelling units, were determined to generate a collective 5,847 vehicular trips during a typical weekday, including 434 AM peak hour trips and 583 PM peak hour trips. It is noted that 93 dwelling units within Villages 1 and 2 are already constructed and occupied and, therefore, TJKM applied appropriate deductions to the estimated trips. Hence, the expected trips associated with the proposed project are estimated to be 4,970 during a typical weekday, including 369 AM peak hour trips and 496 PM peak hour trips.

As part of the 2005 IS/MND, a fee study was prepared and submitted to the City that provided the required details. Payment of the appropriate fees was addressed as part of the Development Agreement for the Jones Ranch Project. The 68 additional dwelling units associated with the proposed project would not affect the fee amount determined and set forth in the executed Development Agreement. Accordingly, Mitigation Measure 4.4-1 is considered to already be implemented through the Development Agreement and would not be applicable to the proposed project. Therefore, although the proposed project would result in an increase in traffic from what has been anticipated for the site in the 2005 IS/MND, the proposed project would not be considered to result in a new or more severe significant impact than previously identified in the 2005 IS/MND related to conflicts between the planned Bypass and other City streets and increased traffic volumes on SR 65.

The 2005 IS/MND also acknowledged that the 2002 EIR identified a significant and unavoidable impact related to increased traffic volumes on Wheatland Road and First Street, for which the City adopted a statement of overriding considerations. The 2002 EIR included Mitigation Measure 4.4-4, which required the applicant to submit a traffic analysis identifying circulation improvements that would reduce projected traffic volumes on First Street to as close to 4,000 average daily trips (ADT) as possible. The analysis and conclusion in the 2002 EIR were based on a planning threshold of significance of whether traffic would exceed 4,000 ADT, which is not an applicable

CEQA threshold of significance. Therefore, Mitigation Measure 4.4-4 of the 2002 EIR is not applicable to the proposed project.

As presented in the Traffic Impact Study conducted by TJKM, the applicable threshold of significance for determining an impact related to increased traffic volumes on a roadway segment is whether the operating conditions cause LOS to fall below LOS D. The Traffic Impact Study included a roadway segment LOS analysis under Existing Plus Project and Cumulative Plus Project conditions, compared to existing and cumulative no project conditions, respectively (see Table 5 and Table 6 below). As shown in the tables, the proposed project would not result in LOS D or worse on Wheatland Road or First Street. Therefore, the proposed project would not result in the creation of a new or increase in the severity of the significant impact identified in the 2005 IS/MND or 2002 EIR related to increased traffic volumes on Wheatland Road and First Street.

Table 5
2024 Existing and 2024 Existing Plus Project Conditions ADT and Segment LOS

Corridor	Segment	2024 ADT	Existing LOS	Additional Project Traffic	Existing Plus Project ADT	Existing Plus Project LOS
First Street	Between E Street and F Street	4,392	C	2,709	7,101	C
Wheatland Road	Between Lewis Road and G Street	4,500	C	2,709	7,209	C
Wheatland Road	Between Fort Mile Road and Oakley Lane	2,186	A/B	433	2,619	A/B
Fourth Street	Between SR 65 and Spenceville Road	1,861	C	147	2,008	C
SR 65	South of Bear River	26,509	**E/F**	1,569	28,078	**E/F**
SR 65	South of State Street	26,165	**E/F**	1,569	27,734	**E/F**
SR 65	South of Main Street	24,857	**E/F**	1,569	26,426	**E/F**
SR 65	North of First Street	26,038	**E/F**	759	26,797	**E/F**
Main Street	Malone Avenue to SR 65	1,758	C	682	2,440	C
Main Street	SR 65 to State Street	3,855	C	464	4,319	C

Source: TJKM, 2025.

Table 6
2040 Cumulative and 2040 Cumulative Plus Project Conditions ADT and Segment LOS

Corridor	Segment	2040 Cumulative ADT	2040 Cumulative LOS	Additional Project Traffic	2040 Cumulative Plus Project ADT	2040 Cumulative Plus Project LOS
First Street	Between E Street and F Street	4,586	C	350	4,936	C
Wheatland Road	Between Lewis Road and G Street	4,698	C	350	5,048	C
Wheatland Road	Between Fort Mile Road and Oakley Lane	2,282	A/B	56	2,338	A/B
Fourth Street	Between SR 65 and Spenceville Road	1,943	C	19	1,962	C
SR 65	South of Bear River	27,678	**E/F**	203	27,881	**E/F**
SR 65	South of State Street	27,319	**E/F**	203	27,522	**E/F**
SR 65	South of Main Street	25,953	**E/F**	203	26,156	**E/F**
SR 65	North of First Street	27,186	**E/F**	98	27,284	**E/F**
Main Street	Malone Avenue to SR 65	1,836	C	89	1,925	C
Main Street	SR 65 to State Street	4,025	C	60	4,085	C

Source: TJKM, 2025.

Increased Delays at Intersections on SR 65

As stated above, the 2005 IS/MND identified a potentially significant impact related to exceeding an established LOS standard, specifically associated with delays at intersections along SR 65, including First Street, Second Street, Third Street, Fourth Street, State Street, and Main Street, and required Mitigation Measure XV-29, which requires the applicant to pay the project's fair share contribution towards the cost of signalization/improvements at the SR 65/Main Street intersection. The 2005 IS/MND also acknowledged that the 2002 EIR identified a significant and unavoidable impact related to increased delays at intersections along SR 65, for which the City adopted a statement of overriding considerations. The 2002 EIR includes Mitigation Measure 4.4-3, which, similar to Mitigation Measure XV-29, required the applicant to pay the project's fair share contribution towards the cost of signalization/improvements at the SR 65/Main Street intersection, as well as at the SR 65/First Street intersection.

Since the 2005 IS/MND was adopted, the SR 65/Main Street and SR 65/First Street intersections have been signalized. In addition, as discussed above, a fee study was prepared and submitted to the City as part of the 2005 IS/MND, which identified the appropriate fees for the project. Payment of the appropriate fees was addressed as part of the Development Agreement for the

Jones Ranch Project. Therefore, Mitigation Measure XV-29 is considered to be already implemented through the Development Agreement and would not be applicable to the proposed project.

The proposed additional 68 dwelling units are expected to generate approximately 641 net new vehicle trips during a typical weekday, including 48 AM peak hour trips and 64 PM peak hour trips. In order to determine the effects of the proposed project's increase in traffic on intersections along SR 65, the Traffic Impact Study included an intersection LOS analysis under Existing Plus Project and Cumulative Plus Project (with and without the SR 65 Bypass) conditions, compared to existing and cumulative no project conditions, respectively (see Table 7 and Table 8 below).

As shown in in Table 7, four of the 11 study intersections currently operate below the City of Wheatland's acceptable LOS threshold of LOS D (the intersections of SR 65 and First Street, Third Street, Fourth Street, and Main Street), and would continue to deteriorate under Existing Plus Project conditions. The Traffic Impact Study includes recommended mitigation to reduce impacts to the SR 65 intersections (see Mitigation Measures TRANS-1 and TRANS-2 below), but for similar reasons as determined in the original 2002 EIR and explained in further detail below, impacts would remain significant. As noted above, the 2002 EIR already identified unacceptable LOS with inclusion of the Jones Ranch Project at the identified intersections and concluded a significant and unavoidable impact would result related to increased delays at intersections along SR 65, for which the City adopted a statement of overriding considerations. The proposed project would not result in substantial degradation of the identified intersections such that a new or substantially more severe significant impact would result. The 2005 IS/MND tiered from and relied upon the analysis within the 2002 EIR. Therefore, the proposed project would not result in any new or more severe significant impacts related to such from what has already been anticipated for the project site in the prior CEQA analyses.

In addition to the SR 65 intersections discussed above, the proposed project would cause the LOS at the Wheatland Road/Oakley Lane and First Street/E Street intersections to deteriorate to below LOS D under Existing Plus Project conditions. However, according to the City's threshold of significance for unsignalized intersections, an intersection would be considered impacted if the LOS falls below LOS D and the peak hour signal warrant is met. Based on this criterion, although the proposed project would cause the LOS at the Wheatland Road/Oakley Lane and First Street/E Street intersections to deteriorate to below LOS D, because, as determined by the Traffic Impact Study, a signal warrant is not met for the intersections, the intersections would not be considered impacted by the project.

Table 7
2002 EIR and 2024 Existing and Existing Plus Project Conditions – Intersection LOS

Intersection	Intersection Control[1]	Peak Hour[2]	2002 EIR Conditions		2024 Existing Conditions		2024 Existing Plus Project Conditions		Change in Delay
			Average Delay[3]	LOS	Average Delay[3]	LOS	Average Delay[3]	LOS	
Wheatland Road/West Site Access	OWSC	AM PM	10.8 10.3	B B	--	--	10.5 9.8	B [NB]* A [NB]*	--
Wheatland Road/Oakley Lane	TWSC	AM PM	13.3 12.0	B B	27.3 11.7	D [SB]* B [SB]*	**36.3** 12.9	**E [SB]*** B [SB]*	+9.0 +1.2
Wheatland Road/Lewis Road	OWSC	AM PM	16.1 11.5	C B	15.2 11.2	C [SB]* B [SB]*	14.9 10.1	B [SB]* B [SB]*	-0.3 -1.1
Wheatland Road/First Street	OWSC	AM PM	10.8 9.5	B A	--	--	17.5 10.7	C [EB]* B [EB]*	--
First Street/E Street	OWSC	AM PM	11.4 9.0	B A	21.9 12.0	C [NB]* B [NB]*	**50.8** 20.5	**F [NB]*** C [NB]*	+27.6 +8.5
SR 65/First Street	Signal	AM PM	25.0 12.1	C B	53.4 51.9	D D	**79.4** **65.0**	**E** **E**	+26.0 +13.1
SR 65/2nd Street	TWSC	AM PM	21.3 13.4	C B	**47.6** **35.3**	**E [WB]*** **E [EB]***	**53.1** **51.2**	**E [WB]*** **F [EB]***	+5.5 +15.9
SR 65/Third Street	TWSC	AM PM	15.7 14.7	C B	24.1 23.4	C [EB]* C [WB]*	25.8 31.6	D [EB]* D [WB]*	+1.7 +8.2
SR 65/Fourth Street	TWSC	AM PM	**105.1** **100.5**	**F** **F**	28.6 **138.4**	D [WB]* **F [EB]***	31.1 **262.0**	D [WB]* **F [EB]***	+2.5 +123.6
SR 65/Main Street	Signal	AM PM	20.4 20.6	C C	45.4 **101.4**	D **F**	**59.8** **129.3**	**E** **F**	+14.4 +27.9
SR 65/State Street	OWSC	AM PM	26.9 21.0	D C	**89.2** **76.8**	**F [WB]*** **F [WB]***	**108.6** **109.3**	**F [WB]*** **F [WB]***	+19.4 +32.5

[1] Signal = Signalized; OWSC = One-Way Stop Control; TWSC = Two-Way Stop Control; AWSC = All-Way Stop Control.
[2] AM = AM Peak Hour; PM = PM Peak Hour
[3] Delay measured in seconds per vehicle. For signalized and all-way stop controlled intersections, the delay represents the average control delay for all turning movements. For one- and two-way stop-controlled intersections, the delay represents the worse average control delay for a given approach.

Bold indicates unacceptable LOS.

Source: TJKM, 2025.

Table 8
2040 Cumulative and 2040 Cumulative Plus Project Conditions – Intersection LOS

Intersection	Intersection Control[1]	Peak Hour[2]	2040 Cumulative Conditions		2040 Cumulative Plus Project Conditions		Change in Delay
			Average Delay[3]	LOS	Average Delay[3]	LOS	
Wheatland Road/West Site Access	OWSC	AM PM	--	--	10.3 9.7	B [NB]* B [NB]*	--
Wheatland Road/Oakley Lane	TWSC	AM PM	31.6 11.9	D [SB]* B [SB]*	33.0 12.1	D [SB]* B [SB]*	+1.4 +0.2
Wheatland Road/Lewis Road	OWSC	AM PM	15.8 11.4	C [SB]* B [SB]*	15.7 11.0	C [SB]* B [SB]*	-0.1 -0.4
Wheatland Road/First Street	OWSC	AM PM	--	--	11.8 9.7	B [NB]* A [NB]*	+11.8 +9.7
First Street/E Street	OWSC	AM PM	24.2 12.2	C [NB]* B [NB]*	26.6 12.9	D [NB]* B [NB]*	+2.4 +0.7
SR 65/First Street	Signal	AM PM	**57.6** **57.3**	**E** **E**	**60.8** **57.9**	**E** **E**	+3.2 +0.6
SR 65/2nd Street	TWSC	AM PM	**55.8** **39.0**	**F [WB]*** **E [EB]***	**57.2** **41.1**	**F [WB]*** **E [EB]***	+1.4 +2.1
SR 65/Third Street	TWSC	AM PM	26.0 25.2	D [EB]* D [WB]*	26.2 26.1	D [EB]* D [WB]*	+0.2 +0.9
SR 65/Fourth Street	TWSC	AM PM	32.4 **168.7**	D [WB]* **F [EB]***	32.6 **185.1**	D [WB]* **F [EB]***	+0.2 +16.4
SR 65/Main Street	Signal	AM PM	52.0 **108.2**	D **F**	51.6 **104.7**	D **F**	-0.4 -3.5
SR 65/State Street	OWSC	AM PM	**102.9** **92.0**	**F [WB]*** **F [WB]***	**105.7** **96.3**	**F [WB]*** **F [WB]***	+2.8 +4.3

[1] Signal = Signalized; OWSC = One-Way Stop Control; TWSC = Two-Way Stop Control; AWSC = All-Way Stop Control.
[2] AM = AM Peak Hour; PM = PM Peak Hour
[3] Delay measured in seconds per vehicle. For signalized and all-way stop controlled intersections, the delay represents the average control delay for all turning movements. For one- and two-way stop-controlled intersections, the delay represents the worse average control delay for a given approach.

Bold indicates unacceptable LOS.

Source: TJKM, 2025.

As shown in in Table 8, five of the 11 study intersections would operate below the City of Wheatland's acceptable LOS threshold of LOS D (the intersections of SR 65 and First Street, Second Street, Fourth Street, Main Street, and State Street), and would continue to deteriorate under Cumulative Plus Project conditions. It should be noted that operations would improve under Cumulative Plus Project with the SR 65 Bypass conditions, but three of the SR 65 intersections would still operate below thresholds and continue to deteriorate with the proposed project, and one additional SR 65 intersection would deteriorate from acceptable to unacceptable conditions with the proposed project. While Mitigation Measures TRANS-1 and TRANS-2 below would reduce impacts to the SR 65 intersections, for similar reasons as determined in the original 2002 EIR and explained in further detail below, impacts would remain significant. As noted above, the 2002 EIR already identified unacceptable LOS with inclusion of the Jones Ranch Project at the identified intersections and concluded a significant and unavoidable impact would result related to increased delays at intersections along SR 65, for which the City adopted a statement of overriding considerations. The proposed project would not result in substantial degradation of the identified intersections such that a new or substantially more severe significant impact would result. The 2005 IS/MND tiered from and relied upon the analysis within the 2002 EIR. Therefore, the proposed project would not result in any new or more severe significant impacts related to such from what has already been anticipated for the project site in the prior CEQA analyses.

Conclusion

Overall, implementation of the mitigation measures listed below would ensure the proposed project would not result in any new significant impacts or more severe significant impacts related to transportation as compared to the 2005 IS/MND.

2005 IS/MND Mitigation Measures

None applicable.

Modified Mitigation Measures

None required.

New Mitigation Measures

While the following project-specific mitigation measures would help to reduce impacts, similar to the conclusions made in the 2002 EIR, from which the 2005 IS/MND tiered, signalization of intersections along SR 65 or any modifications to existing signal timings requires Caltrans approval. Because implementation of the mitigation measures lies outside of the City of Wheatland's jurisdiction, a guarantee that the measures will be implemented cannot be assured. As discussed, the 2002 EIR identified significant and unavoidable impacts related to SR 65 intersection operations, for which the City adopted a statement of overriding considerations. Although impacts related to delays at intersections along SR 65 would remain significant and unavoidable, the proposed project would not result in new or more severe significant impacts than previously identified in the 2005 IS/MND or 2002 EIR related to transportation.

TRANS-1 *Prior to occupancy of the proposed project, the project applicant shall implement signal timing adjustments and create an exclusive eastbound turn lane on the SR 65/First Street intersection. The project applicant shall also implement signal timing adjustments and create an exclusive westbound left turn lane of approximately 300 feet at the SR 65/Main Street intersection. Proof of compliance shall be submitted to the City of Wheatland for approval.*

TRANS-2 *Prior to occupancy of the proposed project, the project applicant shall signalize the SR 65/Fourth Street intersection with protected northbound-left and southbound-left movements. Proof of compliance shall be submitted to the City of Wheatland for approval.*

Remaining Environmental Resource Areas

- Aesthetics
- Agriculture and Forest Resources
- Energy
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Utilities and Service Systems
- Wildfire

The proposed project would include modification of the Jones Ranch Project to include an additional 68 single-family lots, which would increase the total number of single-family lots from the previously approved Jones Ranch Project of 552 to 620. Although the number of units proposed has increased, the development footprint would remain the same and the proposed project would not change the residential nature of development within the project site. In addition, the proposed project would be consistent with the allowable use of the site pursuant to the Low Density Residential General Plan land use designation, and, with a residential density of 3.6 dwelling units per acre (du/ac), would be within the allowable density for the site of three to four du/ac. As such, impacts related to aesthetics associated with buildout of the proposed project would be similar to what was analyzed in the 2005 IS/MND. Because a detailed lighting plan for the proposed project has not been submitted to the City, however, Mitigation Measure I-1 set forth in the 2005 IS/MND, which requires the project developer to prepare a lighting plan, would still be applicable to the proposed project.

Because the proposed project would not extend the area of disturbance beyond the boundaries of the site analyzed in the 2005 IS/MND, and because the project site has only been subject to more disturbance since the 2005 IS/MND was adopted, impacts related to agricultural and forest resources; geology and soils; hazards and hazardous materials; hydrology and water quality; mineral resources; and wildfire (addressed within the hazards and hazardous materials section of the 2005 IS/MND) would be the same as analyzed in the 2005 IS/MND. It should be noted that the 2005 IS/MND includes mitigation measures to address impacts related to the aforementioned resource areas, and the proposed project would be required to comply with all such mitigation measures included in the 2005 IS/MND, as applicable.

The proposed project would result in an increase in population as compared to what was anticipated in the 2005 IS/MND. The 2005 IS/MND anticipated that buildout of the site with 552 single-family residences would result in approximately 1,485 new residents. According to the current U.S. Census data, average household size in the City of Wheatland is 2.82 persons per

household.[9] Buildout of the 620 single-family residential units associated with the proposed project would, therefore, be anticipated to generate approximately 1,748 new residents on-site. As such, population growth associated with the proposed project would increase by 264 residents (approximately 17 percent) from what has been anticipated for buildout of the site. Although the increase in population associated with the proposed project would result in an increase in demand for energy, public services, recreation, and utilities and service systems, sufficient resources and services would be available to serve the proposed project, and such an increase in demand would not be significant such that a new impact or substantial increase in the severity of an impact identified in the 2005 IS/MND would occur. Similarly, construction noise would not significantly increase beyond what was previously anticipated for the site.

As discussed above, the proposed project would generate 641 net new vehicle trips during the typical weekday, which would result in an increase in traffic noise in the project vicinity. Typically, a doubling of traffic volumes along a roadway increases traffic noise by 3 decibels (dB), which is the level at which a change in noise may become perceptible to the human ear. The proposed project would not double the traffic volume along any roadway in the vicinity from what has been anticipated for buildout of the site in the 2005 IS/MND. Accordingly, the increase in operational traffic noise associated with the proposed project would not be considered significant.

Overall, the proposed project would not result in any new significant impacts or substantially more severe significant impacts than what were previously analyzed in the 2005 IS/MND.

[9] U.S. Census Bureau. *Wheatland city, California*. Available at: https://data.census.gov/table/ACSST5Y2023.S1101?q=wheatland,%20ca. Accessed December 2024.

ATTACHMENTS

The technical attachments are available at the City upon request.