

HEAVEN'S GATE PET MEMORIAL CENTER EXPANSION

CEQA ADDENDUM

PREPARED FOR
THE CITY OF WHEATLAND



MARCH 2019

PREPARED BY



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Addendum to the Heaven's Gate Pet Memorial Center Negative Declaration

CEQA REQUIREMENTS

This document has been prepared as an Addendum to the adopted 2015 Heaven's Gate Pet Crematorium Negative Declaration in accordance with the California Environmental Quality Act (CEQA) Guidelines, Section 15164. According to 15164(a), when an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR 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.

Section 15162 provides that the lead agency's role in project approval is completed upon certification of the EIR and approval of the project, unless further discretionary action is required. As discussed in further detail below, the approvals necessary for the Heaven's Gate Pet Memorial Center Expansion Project (proposed project) are considered discretionary actions, and CEQA review is therefore required.

This addendum and attached documents constitute substantial evidence supporting the conclusion that preparation of an additional supplemental or subsequent Initial Study/Negative Declaration (IS/ND) is not required prior to approval of the proposed project, and provides the required documentation under CEQA.

PROJECT BACKGROUND

The Project Background section describes the project location, the approval background of the project, and the currently proposed project description.

Project Location

The Heaven's Gate Pet Memorial Center is located in the City of Wheatland, California. The City of Wheatland is located in Northern California's Central Valley along State Route 65 (SR 65) in Yuba County, approximately one mile north of the Bear River and the tri-county boundary of Sutter, Placer, and Yuba Counties. SR 65 runs northwest to southeast and divides the City into eastern and western sections (see Figure 1). The pet memorial center is located northwest of the intersection of SR 65 (D Street) and Fourth Street, at 603 Fourth Street, within the central commercial district of the City of Wheatland (see Figure 2). The 0.25-acre project site is identified as Yuba County Assessor's Parcel Number (APN) 015-305-012.

Existing Conditions

The site is designated as Commercial (C) in the Wheatland General Plan and zoned Highway Commercial (C-3). A vacant commercial property is located to the north of the site, SR 65 (D Street) to the east, the Wheatland Harvest Church to the south, and single-family residential uses are located to the west. The site is currently developed with an existing, 1,800-square-foot, commercial building and associated parking lot used for the operation of the Heaven's Gate Pet Memorial Center. The building includes a lobby and a staff-only work area, which includes an existing cremation unit. The existing cremation unit is a BLP 500 M3 Animal Crematory, manufactured by B&L Cremation Systems, Inc. The BLP 500 M3 is a natural gas fired animal cremation unit, with a cremation rate of 150 pounds per hour (lb/hour) and a total capacity of 500 pounds (lbs). The duration of the cremation process depends on charge weight.

Figure 1
Regional Project Location

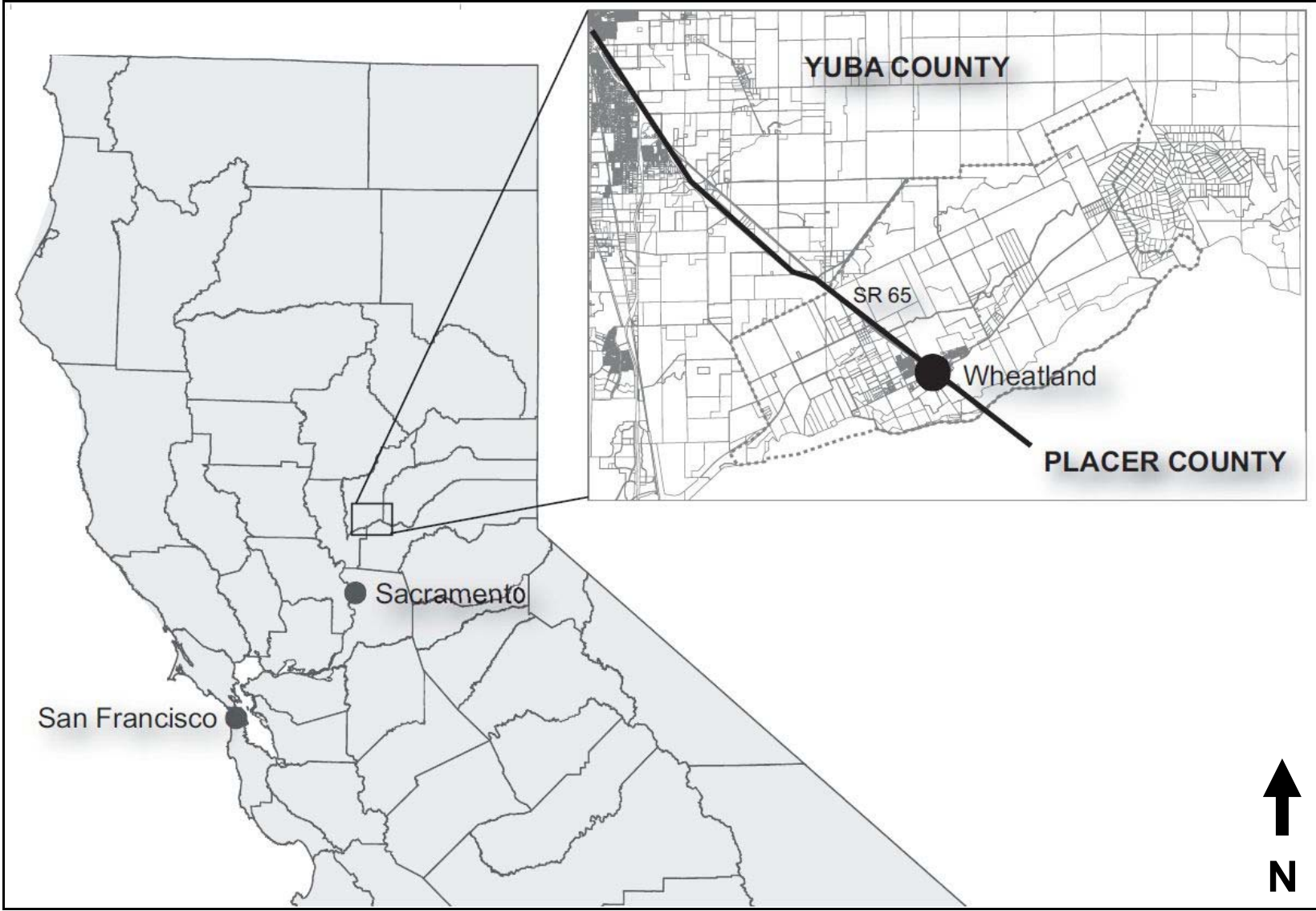


Figure 2
Project Vicinity Map



In addition, the project site includes four existing customer parking spaces (one handicap accessible space) and an existing outdoor sales area. A planter and landscaping exist along the fence and building exterior, as well as surrounding the outdoor sales area. The outdoor sales include related pet memorial items (e.g., pet-oriented garden statuary, bird baths etc.).

The Heaven's Gate Pet Memorial Center hours of operation consist of Mondays through Fridays between 9:00 AM to 5:00 PM, and up to two employees are on-site at any given time. Approximately 70 percent of all business consists of pick-up and delivery (conducted by the business owner) of the deceased animal. The animals are not stored on-site and are processed immediately.

Previous Project Approvals

In 2015, the City of Wheatland approved the IS/ND for the Heaven's Gate Pet Crematorium Project, which consisted of an analysis of the operations of the pet memorial center, as described above, at the then-vacant existing on-site commercial building, as well as minor site improvements such as additional landscaping. The City of Wheatland approved a Conditional Use Permit (CUP) for the Heaven's Gate Pet Memorial Center on April 7, 2015. The IS/ND was also used to provide the Feather River Air Quality Management District (FRAQMD) with the documentation necessary to issue a Permit to Operate for the cremation unit. A Permit to Operate (Permit No. P28012) has since been issued by the FRAQMD for the Heaven's Gate Pet Memorial Center.

Proposed Project Description

The currently proposed project consists of demolition of a portion of the existing Heaven's Gate Pet Memorial Center building, expansion of the building, and introduction of two additional cremation units. Approximately 900 square feet of the existing Quonset hut structure would be removed and replaced with a new 2,640-square-foot metal building, for a total square footage of 3,540. The expanded building would include an exit man door along the back elevation and a roll-up door along the front elevation (see Figure 3). Minor site improvements are also proposed, including exterior benches, fountains, and landscaping. Figure 4 presents the proposed landscaping and site plan.

The expansion would accommodate additional staff work space and the proposed addition of two new cremation units. One of the proposed additional units is intended to begin operating immediately upon approval, while the other unit would come online at a future date, depending on market demands. This Addendum analyzes full operations of the proposed project, including the existing cremation unit and the two additional proposed units. The two additional units would be of the same make and model, as well as cremation rate and capacity, as the existing on-site unit described above and analyzed in the 2015 IS/ND.

Figure 3
Proposed Building Elevations

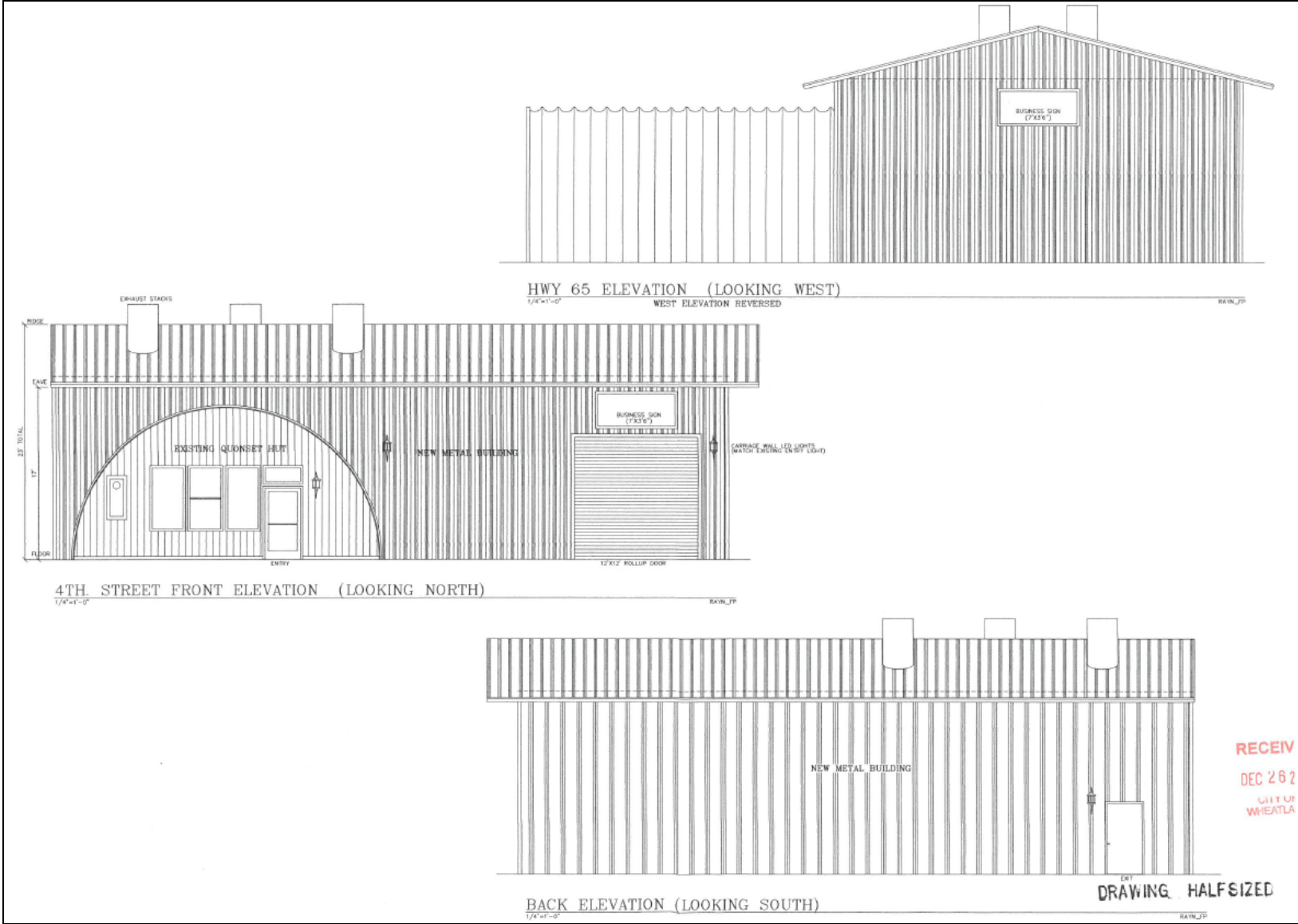
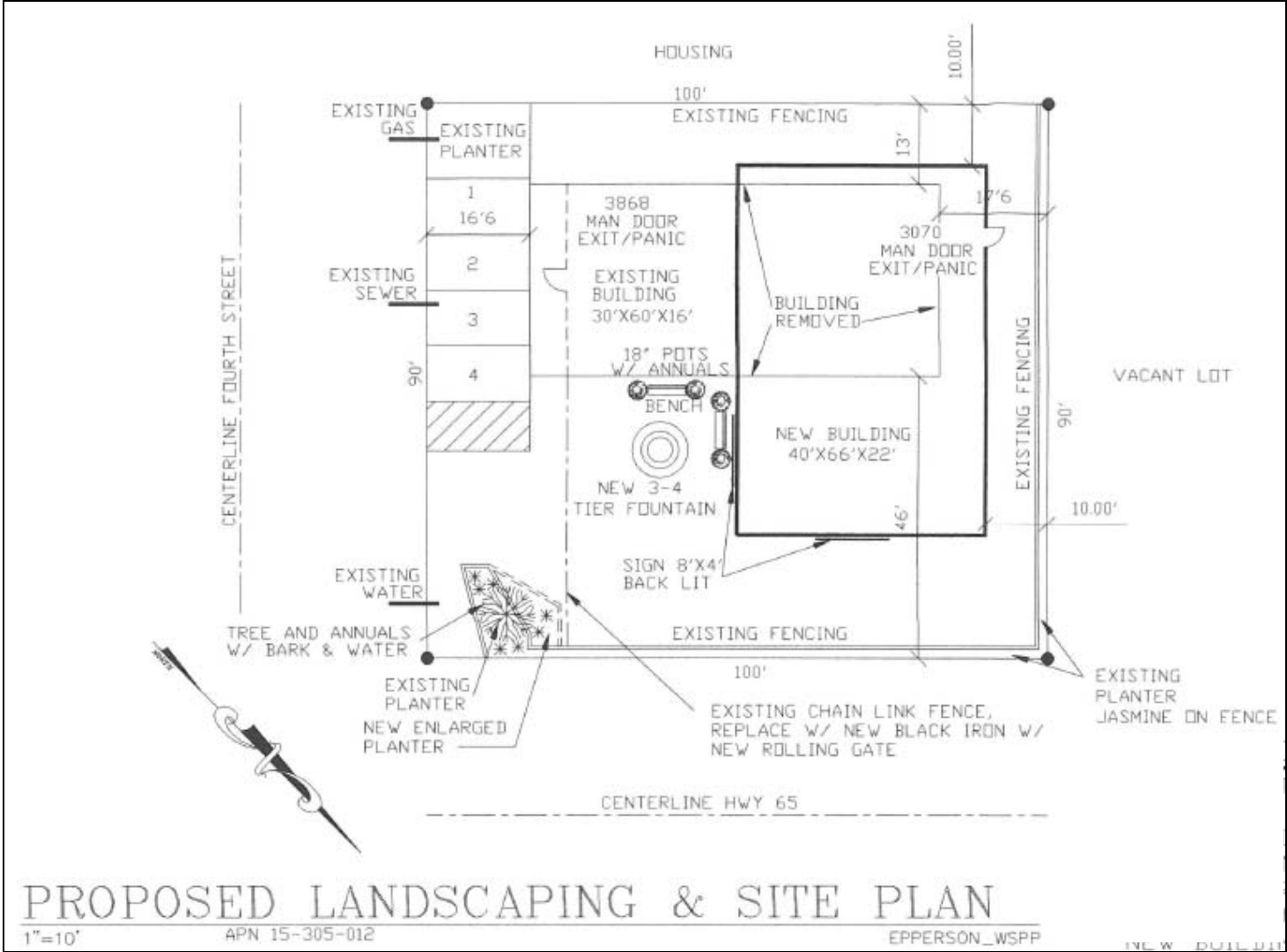


Figure 4
Proposed Landscaping and Site Plan



The currently proposed project would require the following approvals by the City of Wheatland:

- Amendment to the existing CUP;
- Site Plan and Design Review; and
- Variance for the building side setback.

An amendment to the existing CUP would be required pursuant to Section 18.76 of the City's Municipal Code in order to reflect the proposed additional square footage, as well as the increase in operations associated with the addition of two cremation units. Site Plan and Design Review would also be required for the proposed project in accordance with Section 18.67 of the City's Municipal Code. Per Section 18.36.060, the City requires a side setback from residential zoning districts of 15 feet for areas zoned C-3. The existing building currently encroaches within the required 15 feet, with a setback of approximately 10 feet. In order to address the encroachment, the City would require a variance to allow the 10-foot side setback that currently occurs and would continue to occur with the proposed project.

In addition, the proposed project would require an amendment to the existing FRAQMD Permit to Operate for the additional two cremation units proposed. This Addendum is intended to serve as the environmental documentation for use in the FRAQMD's amendment approval process.

ANALYSIS

The proposed modifications to the approved project may result in a limited potential to impact the physical environment beyond what has been previously analyzed for the project site in the 2015 IS/ND. Therefore, it is reasonable and appropriate to focus this environmental analysis on those CEQA topics for which impacts may be triggered as a result of the proposed modifications. Consequently, the environmental analysis in this Addendum focuses on the following CEQA issue areas, which were analyzed in the 2015 IS/ND: air quality and greenhouse gas (GHG) emissions. Each topic is evaluated in detail within the corresponding section below. Remaining CEQA topics that were analyzed in the 2015 IS/ND for which new impacts clearly would not occur as a result of the proposed project (e.g., biological resources, utilities, etc.) are summarily addressed in the section below entitled "Remaining CEQA Topics."

It is important to note that the CEQA Guidelines have been recently updated. More specifically, the updates proposed by the Office of Planning and Research (OPR) in January 2018 have been approved by the Office of Administrative Law and became effective December 28, 2018. As part of the updates, Appendix G, Environmental Checklist Form, of the CEQA Guidelines has been amended. The majority of changes represent consolidated or deleted questions to avoid redundancy, whereas a smaller subset represents additions based on current, often overlooked legal requirements (e.g., Energy) and legislation passed in recent years (e.g., Wildfire – Senate Bill 1241). The above noted additions to Appendix G – Energy and Wildfire – are topics evaluated in this Addendum, as will be demonstrated below.

The newly added Energy section (IV) of the updated CEQA Guidelines Appendix G includes the following checklist questions regarding whether the project would:

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

These added checklist questions reflect the type of energy analysis already required under CEQA (see Pub. Resources Code, § 21100(b)(3) and Appendix F of the CEQA Guidelines). However, because the 2015 IS/ND does not specifically include such an analysis, this Addendum includes a section to address the potential energy-related impacts of the proposed project.

The new Wildfire section (XX) of the updated CEQA Guidelines Appendix G has been added in response to Senate Bill 1241. The Wildfire section includes the following checklist questions:

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

- Substantially impair an adopted emergency response plan or emergency evacuation plan;
- 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;
- 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; or
- 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.

Notably, the Wildfire section checklist questions only apply to a project located in or near a state responsibility area or lands classified as very high fire hazard severity zones. While the 2015 IS/ND prepared for the proposed project did not specifically include a separate checklist section regarding wildfire, impacts related to wildfire hazards were addressed in the Hazards and Hazardous Materials section (VIII). As discussed in this Addendum, the project site is not located in or near a state responsibility area or lands classified as very high fire hazard severity zones. Thus, the project would not meet the criteria necessitating additional wildfire analysis pursuant to the updated CEQA Checklist.

Air Quality

The 2015 IS/ND determined that any increase in criteria air pollutants associated with the site due to project operations would only occur as a result of operation of the cremation unit, specifically from natural gas combustion associated with operation of the cremation unit, as well as from the cremation of the charges. Based on the IS/ND, the project's increase in emissions were estimated to be below the applicable FRAQMD thresholds of significance for criteria air pollutants. Therefore, the operation of the animal cremation unit and the previously approved pet

crematorium would not violate any air quality standards for criteria air pollutants, contribute substantially to the region's nonattainment status of ozone or particulate matter (PM), conflict with or obstruct any applicable air quality plans, or result in a cumulatively considerable increase of any criteria air pollutant. Accordingly, impacts were determined to be less than significant.

In addition to criteria air pollutants, toxic air contaminants (TACs) are also pollutants of concern. The FRAQMD has the authority over stationary or industrial sources and recommends that CEQA documents analyze potential impacts resulting from exposure of TACs. The cremation process may release a variety of air pollutant emissions, including TACs. The emissions would include trace organic compounds and metals. The on-site cremation unit may emit the following TACs: acetaldehyde; arsenic; benzene; beryllium; cadmium; chromium; copper; formaldehyde; hexavalent chromium; hydrochloric acid; hydrogen fluoride; lead; mercury; nickel; polycyclic aromatic hydrocarbons; selenium; toluene; xylenes; and zinc. As such, the IS/ND included a screening level risk analysis to determine the expected level of public health risks at worst-case conditions. Based on the screening level analysis, the project was estimated to result in an increase in lifetime cancer risk less than the applicable thresholds of significance of 10 cancers per million persons or greater, or a Chronic Hazard Index (CHI) or Acute Hazard Index (AHI) of 1.0 or greater. Because the screening level analysis showed that risks associated with the project's emissions of TACs would be less than the applicable thresholds of significance, a detailed health risk assessment was not required, and impacts related to exposure of sensitive receptors to substantial pollutant concentrations were determined to be less than significant.

The IS/ND also evaluated the potential for the project to create objectionable odors. According to the IS/ND, because animals would not be stored on the site and would be processed immediately, odors emitted in association with the decay of the animals would not occur. In addition, the cremation unit has been designed such that the temperature inside the chambers is high enough to evaporate any fluids, which would be the cause of smoke, and the large afterburning area ensures that gases are fully combusted in the chambers prior to exit from the stack. Accordingly, if operated correctly, due to the design, the cremation unit would not be a source of any objectionable odors. Thus, the IS/ND concluded that the project would not create objectionable odors affecting a substantial number of people, and impacts were determined to be less than significant.

Changes to the Project

The proposed project would include demolition of a portion of the existing building, an increase in building square footage, and operation of two additional cremation units, which would all contribute to an increase in the emission of pollutants associated with the site. However, for similar reasons described in the IS/ND and mentioned above, the project as currently proposed would not create objectionable odors affecting a substantial number of people. A discussion of the potential increase in criteria air pollutant and TAC emissions is provided below.

Criteria Air Pollutant Emissions

Because the existing and proposed building expansion both consist of metal prefabricated structures, demolition and construction activities that would typically be associated with

emissions of criteria pollutants, such as operation of heavy-duty construction vehicles and equipment and ground-disturbance, would not occur as a result of the currently proposed project. Other than the proposed building demolition and expansion, the only construction activities that would occur as a result of the proposed project would be minor site improvements, including exterior benches, fountains, and additional landscaping. Because activities that are typically the primary source of emissions during demolition and construction are not necessary for the proposed project, construction-related emissions would not be expected to exceed the applicable FRAQMD thresholds of significance.

While the additional building square footage and cremation units could allow for an increased throughput, which could have an associated increase in trips to and from the site, the project is intended to help meet the existing market demand. The majority of trips to and from the site are made by the business owner/operator, and customer vehicle trips to the site occur rarely, which remain the case with implementation of the proposed project. Thus, the building expansion and operation of additional animal cremation units is not anticipated to directly result in the generation of a substantially greater number of vehicle trips than what has occurred associated with the site. Therefore, an increase in criteria air pollutants associated with the site would only be expected to result directly from operation of the additional two cremation units.

Although this Addendum is only required to analyze the proposed modifications to the approved project, which would be the addition of two cremation units, the analysis herein accounts for the criteria air pollutant emissions associated with the maximum operating potential of the project site (i.e., operation of three total cremation units). The total emissions are compared to the applicable FRAQMD thresholds of significance, which are as follows:

- An increase in emissions of the ozone precursors reactive organic gases (ROG) or oxides of nitrogen (NO_x) greater than 25 pounds per day (lbs/day) during operations; or
- An increase in emissions of PM₁₀ (particulate matter 10 micrometers in diameter and smaller) greater than 80 lbs/day during construction or operations.

Following the same approach as conducted for the IS/ND, using emission factors from the U.S. Environmental Protection Agency (USEPA)'s *Compilation of Air Pollutant Emission Factors*, also known as AP-42, and the USEPA's WebFIRE online database, the total operational ozone precursor emissions of ROG and NO_x, as well as emissions of PM₁₀, associated with operation of all three cremation units at the site is presented in Table 1.

Table 1			
Maximum Increase in Operational Criteria Air Pollutant Emissions (lbs/day)			
Source	ROG	NO_x	PM₁₀
Combustion of Natural Gas	0.24	4.35	0.33
Cremation of Charges	5.38	6.17	2.04
Total	5.62	10.42	2.37
<i>Thresholds of Significance</i>	25	25	80
Note: See Appendix A for detailed calculations.			

As shown in the table, the total emissions would be below the applicable FRAQMD thresholds of significance for operational criteria air pollutants. Therefore, the operation of the animal

cremation units would not violate any air quality standards for criteria air pollutants, contribute substantially to the region's nonattainment status of ozone or PM, conflict with or obstruct any applicable air quality plans, or result in a cumulatively considerable increase of any criteria air pollutant.

TAC Emissions

Because the animal cremation process may release a variety of air pollutant emissions, including TACs, the proposed addition of two new units has the potential to result in emissions of TACs in excess of the applicable thresholds of significance. According to the FRAQMD, the thresholds of significance for stationary sources emitting TACs are as follows:

- An increase in lifetime cancer risk of 10 cancers per million persons (i.e., cancer risk of 1×10^{-5} or greater);
- CHI or screening level chronic risk score of 1.0; or
- AHI or screening level acute risk score of 1.0.

As stated above, this Addendum is only required to analyze the proposed modifications to the approved project, which would be the addition of two cremation units. However, the analysis herein accounts for the TAC emissions associated with the maximum operating potential of the project site (i.e., operation of three total cremation units). In order to determine the health risks associated with full operations at the project site, the concentrations of TACs were calculated using the American Meteorological Society/Environmental Protection Agency (AMS/EPA) Regulatory Model (AERMOD) dispersion model. The associated cancer risk and non-cancer CHI and AHI were calculated using the CARB's Hotspot Analysis and Reporting Program 2 Risk Assessment Standalone Tool (HARP 2 RAST),¹ which calculates the cancer and non-cancer health impacts using the risk assessment guidelines of the 2015 Office of Environmental Health Hazard Assessment (OEHHA) Guidance Manual for Preparation of Health Risk Assessments.² The combined health risks from the following TACs were calculated using the foregoing methodology: Acetaldehyde, Arsenic, Benzene, Beryllium, Cadmium, Chromium (hex), copper, formaldehyde, hydrogen chloride, hydrogen fluoride, lead, nickel, selenium, zinc, chlorinated dibenzodioxins and furans, and PAH (benzo(a)pyrene equivalents). All modeling results and side calculations related to the analysis of TAC exposure are presented within Appendix B to this Addendum.

According to the modeling results, the emissions of TACs associated with operation of all three cremation units at the site would result in health risks to the maximally exposed individual in comparison to the applicable thresholds of significance as presented in Table 2. As shown in the table, operation of the animal cremation units would not result in an increase in lifetime cancer risk of 10 cancers per million persons or greater, or a CHI or AHI of 1.0 or greater.

¹ California Air Resources Board. *User Manual for the Hotspots Analysis and Reporting Program Health Risk Assessment Standalone Tool, Version 2*. March 17, 2015.

² Office of Environmental Health Hazard Assessment. *Air Toxics Hot Spots Program Risk Assessment Guidelines, Guidance Manual for Preparation of Health Risk Assessments* [pg. 8-18]. February 2015.

Table 2			
Health Risk Assessment Results			
	Cancer Risk	CHI	AHI
Total Health Risk	9.25	0.06	0.04
<i>Threshold of Significance</i>	<i>>10</i>	<i>>1.0</i>	<i>>1.0</i>
Note: See Appendix B for detailed calculations.			

Conclusion

Based on the above, the proposed project does not involve changes that would result in new significant impacts or substantially more severe impacts relative to 2015 IS/ND related to air quality.

Changes in Circumstances

Since adoption of the 2015 IS/ND, new circumstances that would involve new significant impacts or substantially more severe impacts to the previously approved project with regard to air quality have not occurred.

Changes in Information

New information of substantial importance, which was not known and could not have been known at the time the 2015 IS/ND was prepared, has not come to light in relation to air quality or specifically to the proposed project from what has been previously analyzed. Thus, new significant impacts or substantially more severe impacts to the previously approved project as a result of changes in information would not occur related to air quality.

Conclusion

Based on the above, the proposed project would not result in any changes, new circumstances, or new information that would involve new significant impacts or substantially more severe impacts related to air quality from what has been anticipated for the project site in the 2015 IS/ND.

Energy

As stated above, the 2015 IS/ND did not specifically include an analysis of energy-related impacts.

Changes to the Project

The proposed project would involve an increase in building square footage and addition of two cremation units from what currently occurs on the project site, which would result in an associated increase in energy consumption from existing levels. The effects related to energy resultant of changes to the project, in comparison with the newly added checklist questions per Appendix G of the CEQA Guidelines, are discussed in further detail below in the Changes in Information section.

Changes in Circumstances

As discussed above, the updated CEQA Guidelines Appendix G includes a newly added Energy section. However, the added checklist questions reflect the type of energy analysis already required under CEQA (see Pub. Resources Code, § 21100(b)(3) and Appendix F of the CEQA Guidelines). Therefore, energy is not a “new” issue and could have been raised at the time that the 2015 IS/ND was prepared and considered for adoption. For this reason, the lead agency is not required to prepare a supplemental or subsequent IS/ND based solely on issues relating to energy. Therefore, the overall consumption of energy from development within the project site cannot constitute a new significant impact, or new information or circumstance of substantial importance. Nonetheless, because the 2015 IS/ND did not specifically include an analysis of energy-related impacts, the lead agency has elected to include such an analysis within this Addendum for informational purposes. A detailed discussion is provided in the Changes to Information section below.

Changes in Information

Although, as stated above, the newly added Appendix G section does not necessarily represent a change in information or circumstances under which the project was undertaken, the lead agency has elected to include an analysis of energy-related impacts for informational purposes.

The newly added Energy section (IV) of the updated CEQA Guidelines Appendix G includes the following checklist questions regarding whether the project would:

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

Construction Energy Use

Construction typically involves energy demand and consumption related to use of oil in the form of gasoline and diesel fuel for construction worker vehicle trips, hauling and materials delivery truck trips, and operation of off-road construction equipment. In addition, diesel-fueled portable generators are sometimes necessary to provide additional electricity demands for temporary on-site lighting, welding, and for supplying energy to areas of the sites where energy supply cannot be met via a hookup to the existing electricity grid. Because the existing and proposed building expansion both consist of metal prefabricated structures, demolition and construction activities would be relatively minor. In addition, only portions of the project site would be disturbed as a result of the proposed project.

Furthermore, any construction equipment and operation thereof on-site would be regulated per the CARB In-Use Off-Road Diesel Vehicle Regulation. The In-Use Off-Road Diesel Vehicle Regulation is intended to reduce emissions from in-use, off-road, heavy-duty diesel vehicles in California by imposing limits on idling, requiring all vehicles to be reported to CARB, restricting the addition of older vehicles into fleets, and requiring fleets to reduce emissions by retiring,

replacing, or repowering older engines, or installing exhaust retrofits. The In-Use Off-Road Diesel Vehicle Regulation would subsequently help to improve fuel efficiency and reduce GHG emissions. Technological innovations and more stringent standards are being researched, such as multi-function equipment, hybrid equipment, or other design changes, which could help to reduce demand on oil and emissions associated with construction.

The CARB has recently prepared the *2017 Climate Change Scoping Plan Update* (2017 Scoping Plan),³ which builds upon previous efforts to reduce GHG emissions and is designed to continue to shift the California economy away from dependence on fossil fuels. Appendix B of the 2017 Scoping Plan includes examples of local actions (municipal code changes, zoning changes, policy directions, and mitigation measures) that would support the State's climate goals. The examples provided include, but are not limited to, enforcing idling time restrictions for construction vehicles, utilizing existing grid power for electric energy rather than operating temporary gasoline/diesel-powered generators, and increasing use of electric and renewable fuel-powered construction equipment. The regulation described above, with which the proposed project must comply, would be consistent with the intention of the 2017 Scoping Plan and the recommended actions included in Appendix B of the 2017 Scoping Plan.

Based on the above, any temporary increase in energy use occurring during construction of the proposed project would not result in a significant increase in peak or base demands or require additional capacity from local or regional energy supplies. In addition, the proposed project would be required to comply with all applicable regulations related to energy conservation and fuel efficiency, which would help to reduce the temporary increase in demand.

Operational Energy Use

PG&E currently provides, and would continue to provide electricity and natural gas to the project site. Energy use associated with operations at the project site includes electricity and natural gas for interior and exterior building lighting, operation of the cremation units, electronic equipment, and other uses typical of commercial development. Maintenance activities during operations, such as landscape maintenance, involve the use of electric or gas-powered equipment. In addition to on-site energy use, transportation energy use occurs related to vehicle trips associated with the site.

The proposed project would increase energy usage from existing levels primarily due to the increase in energy demand associated with the additional cremation units and, to a lesser degree, the increase in building square footage (e.g., energy for any heating/ventilation of the additional space). The building expansion would be subject to all relevant provisions of the most recent update of the California Building Standards Code (CBSC), including the Building Energy Efficiency Standards, which would ensure that the structure would consume energy efficiently through the incorporation of such features as efficient insulation, heating systems, and high efficacy lighting. In addition, electricity supplied to the project by PG&E would comply with the State's Renewables Portfolio Standard (RPS), which requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible

³ California Air Resources Board. *The 2017 Climate Change Scoping Plan Update*. January 20, 2017.

renewable energy resources to 33 percent of total procurement by 2020 and to 60 percent by 2030. Thus, a portion of the energy consumed during project operations would originate from renewable sources.

With regard to transportation energy use, while the additional building square footage and cremation units could allow for an increased throughput, which could have an associated increase in trips to and from the site, the project is intended to help meet the existing market demand. Thus, the building expansion and operation of additional animal cremation units is not anticipated to directly result in the generation of a substantially greater number of vehicle trips than what has occurred associated with the site. In addition, the project is subject to all applicable regulations associated with vehicle efficiency and fuel economy.

For the above reasons, energy use associated with project operations would not be considered wasteful, inefficient, or unnecessary.

Conclusion

Based on the above, the existing project, as well as construction and operation of the proposed project, would not result in wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Thus, a less-than-significant impact would occur and new significant impacts or substantially more severe impacts to the previously approved project as a result of changes to the project or in information would not occur related to energy.

Conclusion

Based on the above, the proposed project would not result in any changes, new circumstances, or new information that would involve new significant impacts or substantially more severe impacts related to energy from what has been anticipated for the project site in the 2015 IS/ND.

Greenhouse Gas Emissions

The 2015 IS/ND determined that construction-related emissions of GHG would not be expected to cause any significant impacts on the environment, or conflict with any applicable regulations related to GHG emissions. Because a greater number of vehicle trips than what had previously occurred associated with the site would not occur, the only increase in GHG emissions was associated with the operation of the on-site cremation unit. Operation of the cremation unit was estimated to result in GHG emissions below the applicable thresholds of significance. Therefore, the 2015 IS/ND concluded that operation of the now-approved project would not to conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, and impacts on the environment were determined to be less than significant.

Changes to the Project

The proposed project would include demolition of a portion of the existing building, an increase in building square footage, and operation of two additional cremation units, which would all contribute to an increase in GHG emissions associated with the site.

As discussed in the 2015 IS/ND, construction GHG emissions are a one-time release and are typically considered separate from operational emissions, as global climate change is inherently a cumulative effect that occurs over a long period of time and is quantified on a yearly basis. In addition, due to the minimal construction activities necessary for the proposed project, for similar reasons as discussed above in the Air Quality section, construction-related emissions of GHG would not be expected to cause any significant impacts on the environment, or conflict with any applicable regulations related to GHG emissions.

While the additional building square footage and cremation units could allow for an increased throughput, which could have an associated increase in trips to and from the site, the project is intended to help meet the existing market demand. Thus, the building expansion and operation of additional animal cremation units is not anticipated to directly result in the generation of a substantially greater number of vehicle trips than what has occurred associated with the site. Therefore, an increase in GHG emissions associated with the site would only be expected to result directly from operation of the additional two cremation units.

Since adoption of the 2015 IS/ND, the City of Wheatland has adopted a Climate Action Plan (CAP), which establishes emissions reductions measures to ensure that development within the City complies with statewide GHG emissions reductions goals established by Assembly Bill (AB) 32 and Senate Bill (SB) 32. The adoption of the CAP changes the circumstances under which a project is analyzed under CEQA with regard to GHG emissions and global climate change. The effects related to GHG emissions resultant of changes to the project, in comparison with the standards included in the City's newly adopted CAP, are discussed in further detail below in the Changes in Information section.

Changes in Circumstances

At the time the 2015 IS/ND was prepared, as noted in the IS/ND, neither the FRAQMD nor the City had adopted a threshold of significance for GHG emissions. However, since the adoption of the 2015 IS/ND, the City has adopted a Climate Action Plan (CAP), which includes guidelines for the review of proposed projects within the City. The City's CAP meets the requirements of a qualified CAP under CEQA, and is intended to be used to determine a project's impacts related to GHG emissions. The City Wheatland City Council adopted the CAP on December 11, 2018, and the City is in the process of preparing a Sustainability Checklist, that will be used to assess future projects for consistency with the CAP. Although a Sustainability Checklist has not yet been prepared or adopted by the City, Chapter VI, Implementation, of the City's CAP provides guidance for the analysis of certain projects within the City. The project site is located in an area designated in the CAP as Development Zone A. The CAP notes that projects within Development Zone A would inherently help to advance multiple reduction measures within the CAP, and should be provided regulatory streamlining provided that such projects comply with

applicable emissions reductions strategies. Thus, the proposed project would be considered in compliance with the City's CAP if the proposed project is consistent with the applicable reduction measures within the City's CAP. A detailed analysis of the proposed project's compliance with the City's CAP is presented in the Changes in Information section below.

Changes in Information

The proposed project includes the continued use of the project site for animal cremations with an increased density of development within the site. The increased density of the site is considered consistent with Land Use Measure 3 of the CAP, which supports sustainable growth within the City through infill and higher-density development within the City. Furthermore, the proposed project, as well as the existing on-site facility, represents a reuse of the site from the previous plant nursery use. Such reuse is considered consistent with Land Use Measure 1 of the CAP. The project site frontages to D Street and Fourth Street include sidewalks and the site is only 40 feet away from the nearest existing transit stop. The proximity of the project site to existing transit and the existence of sidewalks along the site frontages make the site accessible to use of alternative modes of transportation, which complies with Transportation Measures 1, 3, and 4 of the CAP. As discussed under the Energy section above, the proposed addition to the existing structure would comply with the CBSC, which includes the California Green Building Standards Code (CalGreen). Construction of the proposed addition to the existing structure in compliance with the requirements of CalGreen would be sufficient to ensure the proposed project complies with Energy Measure 5 of the City's CAP. Thus, the proposed project would be consistent with all of the applicable reduction measures identified within the City's CAP that have been enacted, and the project would be considered consistent with the City's CAP.

Because the proposed project would be considered consistent with the City's CAP, the project would not generate GHG emissions that may have a significant impact on the environment or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs. Therefore, new significant impacts or substantially more severe impacts to the previously approved project as a result of changes to the project or in information would not occur related to GHG emissions.

Conclusion

Based on the above, the proposed project would not result in any changes, new circumstances, or new information that would involve new significant impacts or substantially more severe impacts related to GHG emissions from what has been anticipated for the project site in the 2015 IS/ND.

Wildfire

As stated above, while the 2015 IS/ND prepared for the proposed project did not specifically include a separate checklist section regarding wildfire, impacts related to wildfire hazards were addressed in the Hazards and Hazardous Materials section (VIII). According to the Hazards and Hazardous Materials section of the 2015 IS/ND, because the proposed project involved the reuse of a developed site within an urbanized area of the City, and the project site is not in proximity to

any nearby grassland areas, the operation of an animal crematorium at the project site was determined to result in no impact related to wildland fires.

Changes to the Project

Changes to the project would consist of demolition of a portion of the existing building, expansion of the building, additional of two new cremation units, and minor site improvements. None of the proposed changes to the project have the potential to increase the likelihood for wildland fires to occur on or near the project site. Thus, the proposed project does not involve changes that would result in new significant impacts or substantially more severe impacts relative to 2015 IS/ND related to wildfire.

Changes in Circumstances

As discussed above, the updated CEQA Guidelines Appendix G includes a newly added Wildfire section. Notably, the checklist questions only apply to a project located in or near a state responsibility area or lands classified as very high fire hazard severity zones. While the 2015 IS/ND did not specifically include a separate checklist section regarding wildfire, impacts related to wildfire hazards were addressed in the Hazards and Hazardous Materials section (VIII) of the IS/ND. In addition, according to the California Department of Forestry and Fire Protection, the City of Wheatland, including the project site, is not located in a Very High Fire Hazard Severity Zone.⁴ Thus, the project would not meet the criteria necessitating additional wildfire analysis pursuant to the updated CEQA Checklist. Furthermore, since adoption of the 2015 IS/ND, the land uses surrounding the project site have not changed appreciably, as the project site remains within an urbanized area of the City. Overall, new circumstances that would involve new significant impacts or substantially more severe impacts to the previously approved project related to wildfire would not occur.

Changes in Information

New significant impacts or substantially more severe impacts to the previously approved project as a result of changes in information would not occur related to wildfire.

Conclusion

Based on the above, the proposed project would not result in any changes, new circumstances, or new information that would involve new significant impacts or substantially more severe impacts related to wildfire from what has been anticipated for the project site in the 2015 IS/ND.

⁴ California Department of Forestry and Fire Protection. *Yuba County Fire Hazard Severity Zones in LRA*. October 5, 2007.
California Department of Forestry and Fire Protection. *Yuba County Fire Hazard Severity Zones in SRA*. October 5, 2007.

Remaining CEQA Topics

All impacts were identified in the 2015 IS/ND as no impact or less than significant. Mitigation measures were not required. The currently proposed project consists of demolition of a portion of the existing building, expansion of the building, and introduction of two additional cremation units. Minor site improvements are also proposed, including exterior benches, fountains, and landscaping. The expanded building would be of similar material and type as existing; thus, the proposed changes would not modify the overall visual character or quality of the site. In addition, the on-site lighting would not result in substantial new sources of night lighting contributing to sky glow around the City, and new sources of substantial glare would not be introduced. Therefore, the proposed project would not result in any changes, new circumstances, or new information that would involve new significant impacts or substantially more severe impacts related to aesthetics from what has been anticipated for the project site in the 2015 IS/ND.

The project site is not currently used for or planned for agricultural or forest resources. The proposed project would not introduce any such uses. Thus, the proposed project would not result in any changes, new circumstances, or new information that would involve new significant impacts or substantially more severe impacts related to such from what has been anticipated for the project site in the 2015 IS/ND.

As mentioned above, the other than the proposed building demolition and expansion, the only construction activities that would occur as a result of the proposed project would be minor site improvements, including exterior benches, fountains, and additional landscaping. Construction activities necessary for the demolition and expansion would be expected to be minor as well, due to the developed nature of the site and metal, prefabricated building materials. For example, ground-disturbing activities such as site grading would not be required. Only ornamental landscaping exists on the project site. Modifications to any trees or other such vegetation that could potentially be used by wildlife would not occur with the proposed project. Due to the lack of existing on-site habitat, as well as the minimal nature of on-site improvements necessary, effects to biological resources would not occur. For similar reasons, the potential to encounter any previously unknown cultural or tribal cultural resources does not exist. The same geologic and soil conditions that currently occur on the site would remain with implementation of the proposed project. The proposed project would not involve any modifications to the site or building that could increase the likelihood for any potential geologic hazards at the site. Therefore, the proposed project would not result in any changes, new circumstances, or new information that would involve new significant impacts or substantially more severe impacts related to biological resources, cultural resources, or geology and soils from what has been anticipated for the project site in the 2015 IS/ND.

The general operations at the site would not be modified as a result of the proposed project, with the exception of the additional of two new cremation units. The addition of the two cremation units would not involve any increase in the routine transport, use, or disposal of hazardous materials. In addition, as discussed above, the proposed project would not result in emissions of any air pollutants that would exceed applicable thresholds of significance. Thus, the proposed project would not result in any changes, new circumstances, or new information that would

involve new significant impacts or substantially more severe impacts related to hazards and hazardous materials from what has been anticipated for the project site in the 2015 IS/ND.

Although the proposed project would increase the building square footage on the site, the project site already consists of impervious surfaces. Thus, an increase in the amount of impervious surface at the site would not occur, and, accordingly, an increase in the rate or amount of stormwater runoff associated with the site would not occur. In addition, because the general operations at the site would not be modified as a result of the proposed project, the project would not have the potential to result in additional sources of polluted runoff associated with the site. As a result, the proposed project would not result in any changes, new circumstances, or new information that would involve new significant impacts or substantially more severe impacts related to hydrology and water quality from what has been anticipated for the project site in the 2015 IS/ND.

The proposed project would be consistent with the existing land use on the site, as well as the land use and zoning designations for the site. Thus, changes, new circumstances, or new information that would involve new significant impacts or substantially more severe impacts related to land use and planning from what has been anticipated for the project site in the 2015 IS/ND would not occur.

Although the proposed project would allow for an increase the number of cremation units that would eventually operate on-site, similar to the existing cremation unit, the additional units would not be expected to generate an increased amount of noise compared to other existing commercial development along the City's main commercial corridor. The cremation units include a secondary combustion blower, which allows for low-noise operation. The units would be fully enclosed indoors and would not affect the nearest residential home located over 50 feet from the site. Therefore, the proposed project would not result in any changes, new circumstances, or new information that would involve new significant impacts or substantially more severe impacts related to noise from what has been anticipated for the project site in the 2015 IS/ND.

The proposed project would not involve the introduction of housing, an increase in employees at the site, or any other changes that would affect population or housing in the area. As such, an increase in the demand for or use of public services or recreation facilities in the area would not occur. Consequently, the proposed project would not result in any changes, new circumstances, or new information that would involve new significant impacts or substantially more severe impacts related to population and housing, public services, or recreation from what has been anticipated for the project site in the 2015 IS/ND.

As mentioned above, while the additional building square footage and cremation units could allow for an increased throughput, which could have an associated increase in trips to and from the site, the project is intended to help meet the existing market demand. The majority of trips to and from the site are typically made by the business owner/operator, and customer vehicle trips to the site occur rarely. Thus, the building expansion and operation of additional animal cremation units is not anticipated to directly result in the generation of a substantially greater number of vehicle trips than what has occurred associated with the site. As a result, the proposed

project would not result in any changes, new circumstances, or new information that would involve new significant impacts or substantially more severe impacts related to transportation from what has been anticipated for the project site in the 2015 IS/ND.

The proposed project would not involve any changes in operations such that a substantial increase in the demand for water, wastewater, stormwater, or solid waste services from existing levels would occur. Thus, changes, new circumstances, or new information that would involve new significant impacts or substantially more severe impacts related to utilities and services systems from what has been anticipated for the project site in the 2015 IS/ND would not occur.

Overall, based on the above, the proposed project would not result in any changes, new circumstances, or new information that would involve new significant impacts or substantially more severe impacts from what has been anticipated for the project site in the 2015 IS/ND.

DETERMINATION

In review of this Addendum, staff has concluded that the project does not represent a substantive change in the approval of the Heaven's Gate Pet Memorial Center, as analyzed under the City of Wheatland 2015 IS/ND. The 2015 IS/ND determined that implementation of the original Heaven's Gate Pet Memorial Center would not result in any significant environmental impacts and mitigation was not necessary. Based on this Addendum, with implementation of the proposed expansion project, new impacts would not occur. Therefore, based on this analysis, the City has determined that the proposed project does not trigger the need for a subsequent or supplemental IS/ND, because substantial changes in the project, changes in project circumstances, or new information would not occur that would require additional environmental review under the standards of CEQA Guidelines section 15162.

APPENDIX A

APPENDIX B
