

CHAPTER 6 OTHER CEQA CONSIDERATIONS

This chapter includes the following considerations that are required to be discussed in an environmental impact report (EIR) in accordance with the California Environmental Quality Act (CEQA):

- Effects Not Found to Be Significant (Section 6.1)
- Significant and Unavoidable Environmental Impacts (Section 6.2)
- Significant and Irreversible Environmental Changes (Section 6.3)
- Growth Inducement (Section 6.4)
- Energy Consumption (Section 6.5)

6.1 EFFECTS NOT FOUND TO BE SIGNIFICANT

This section discusses potential environmental impacts from the Mitchell Farms Subdivision (proposed project) that were found not to be significant based on the analysis in the Notice of Preparation. The Notice of Preparation was released for public review on June 30, 2017. No Initial Study was prepared with the Notice of Preparation, as the City assumed that a number of impacts would be significant or potentially significant even after implementation of mitigation. All potential effects are evaluated in this Draft EIR. Each section identifies where no impacts to resources would occur and those impacts that were determined to be less than significant.

6.2 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS

Implementation of the project-specific mitigation measures identified in Chapter 4, Environmental Analysis, would reduce all of the project's significant impacts to less than significant levels. The project would not result in any significant and unavoidable impacts.

A summary of the potentially significant and significant impacts of the project, the applicable mitigation measures, and the level of impact significance after implementation of mitigation measures is provided in Chapter 1, Executive Summary.

6.3 SIGNIFICANT AND IRREVERSIBLE ENVIRONMENTAL CHANGES

The CEQA Guidelines (14 CCR 15000 et seq.) mandate that an EIR address any significant irreversible environmental changes that would be involved in the proposed action should it be implemented (14 CCR 15126(c)). An impact would fall into this category if:

- The project would involve a large commitment of nonrenewable resources.

- The primary and secondary impacts of the project would generally commit future generations of people to similar uses.
- The project involves uses in which irreversible damage could result from any potential environmental incidents associated with the project.
- The proposed consumption of resources is not justified (e.g., the project results in wasteful use of energy).

Determining whether the proposed project may result in significant irreversible changes requires a determination of whether key resources would be degraded or destroyed in such a way that there would be little possibility of restoring them. The project site is located within an urbanized area within the City of Citrus Heights (City) and the site does not support sources of nonrenewable resources, such as mineral resources. Natural resources in the form of building materials would be used in the construction of the proposed project; these resources have varying degrees of renewability. However, their use would be characteristic of typical development projects and use of these resources for construction of the proposed project is not expected to negatively impact the availability of these resources for other uses. Due to the scale of the proposed project, the use of construction materials and nonrenewable resources would not be unusual or extraordinary, and as a result there would be no significant irreversible environmental effects related to resource consumption during construction.

The project would not result in impacts that commit future generations to similar uses. The project would construct 260 residential units and associated infrastructure. The project would be uniquely suited to the proposed residential uses. However, should the buildings become vacant in the future it would be feasible for interior renovations to be made to adjust the buildings to a different user or to demolish buildings and develop the site for a different land use. Changes to the land uses would likely require amending the General Plan and zoning designations, which would require approval from the City.

The proposed project would not introduce highly hazardous land uses or activities to the project site such that there would be a potential for irreversible damage from incidents such as a release of hazardous materials, explosion, or other potentially catastrophic event.

On a permanent, long-term basis, the proposed project would consume energy. However, as discussed further in Section 6.5, the project's energy consumption does not constitute a significant and irreversible environmental change.

6.4 GROWTH INDUCEMENT

CEQA requires a discussion of ways in which the proposed project could induce growth in the project area. The CEQA Guidelines identify a project as growth inducing if it fosters economic

or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment (14 CCR 15126.2(d)). New population from residential development represents direct forms of growth. These direct forms of growth have a secondary effect of expanding the size of local markets and inducing additional economic activity in the area. A project could indirectly induce growth by reducing or removing barriers to growth or by creating a condition that attracts additional population or new economic activity. However, the proposed project consists of an infill project within a city that has been largely built out. Therefore, the potential for the proposed project to indirectly lead to growth is minimal.

The project's potential to induce growth in the project area is discussed in Section 4.2, Population and Housing. In that analysis, the project was found to have a less than significant potential to induce growth in the region.

6.5 ENERGY CONSUMPTION

CEQA provides that an environmental impact report shall include a detailed statement identifying all significant effects on the environment of a proposed project, and mitigation measures proposed to minimize significant effects on the environment, including, but not limited to, “measures to reduce the wasteful, inefficient, and unnecessary consumption of energy” (California Public Resources Code, Section 21100(b)(1),(3)).

Appendix F of the CEQA Guidelines, Energy Conservation, includes recommendations for information that should be included in an EIR to “assure that energy implications are considered in project decisions” (14 CCR 15000 et seq.). Appendix F directs that EIRs should include “discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy (see Public Resources Code section 21100(b)(3))” (14 CCR 15000 et seq.).

Appendix F of the CEQA Guidelines lists potential energy impacts that may be relevant to the Energy Conservation analysis in an EIR. Where a listed item is applicable or relevant to a proposed project, the EIR should consider it. This analysis applied the following relevant listed items from Appendix F, subdivision (II)(F)(C), to the discussion of impacts: energy requirements and energy use efficiencies of the project by fuel type and amount for each stage of the project, the effects of the project on local and regional energy supplies and on requirements for additional capacity, compliance with existing energy standards, the effects of the project on energy resources, and the project's projected transportation energy use requirements and overall use of efficient transportation alternatives.

Additionally, Appendix F provides a list of potential energy impacts and conservation measures that may be relevant to the discussion of the Project Description. Accordingly, Chapter 3, Project Description, of this EIR includes discussions of utilities and project construction, which address

the following relevant items from Appendix F, subdivision (II)(A): energy consuming equipment and processes to be used during the various phases of the project and identification of energy supplies that would serve the project. These issues are also discussed in Sections 4.7: Air Quality, 4.8: Greenhouse Gas Emissions, and 4.10: Public Services and Utilities, of this EIR.

In accordance with Appendix F, this EIR includes relevant information and analyses that address the energy implications of the project. This section represents a summary of the project's anticipated energy needs, impacts, and conservation measures. Information found herein, as well as other aspects of the project's energy implications, are discussed in greater detail elsewhere in this EIR, including in Section 4.5: Transportation; Section 4.7: Air Quality; Section 4.8: Greenhouse Gas Emissions; and Section 4.10: Public Services and Utilities.

6.5.1 Energy Setting

Local Service and Use

Electricity

Sacramento Metropolitan Utilities District (SMUD) provides electric services to 1.5 million customers throughout a 900-square-mile service area in and around the Sacramento Metropolitan Area (SMUD 2018). The residents of Citrus Heights receive their electrical service from SMUD. According to the California Energy Commission (CEC), SMUD consumed approximately 10.49 billion kilowatt-hours (kWh) of electricity in total in 2016 (CEC 2016a). SMUD's total residential electrical consumption was approximately 4.67 billion kWh (CEC 2016b).

SMUD receives electric power from a variety of sources. In 2016, 20% of SMUD's power came from non-carbon-emitting power sources, including biomass/waste, geothermal, small hydroelectric, solar, and wind sources while large hydroelectric made up 23% of SMUD's power mix (SMUD 2016).

The Overview webpage at the California Energy Almanac, the online database of the CEC, states that statewide electricity generation exceeds 200,000 gigawatt-hours each year, with natural gas as the main source for electricity generation, responsible for 60.5% of the total in-state electric generation system power. In addition, the Renewables Portfolio Standard established a goal for California to increase the amount of electricity generated from renewable energy resources to 20% by 2010 and to 33% by 2020. Currently, California's in-state renewable generation is composed of biomass, geothermal, small hydro, wind, and solar generation sites that make up approximately 25% of the total in-state generational output (SMUD 2016).

Based on recent energy supply and demand projections in California, statewide annual peak demand is projected to grow an average of 890 megawatts (MW) per year for the next decade, or

1.4% annually, while per capita consumption is expected to remain relatively constant at 7,200–7,800 kWh per person (CEC 2007). In Sacramento County, the CEC reported an annual electrical consumption of approximately 10.85 billion kWh in total, with 4.79 billion kWh for residential use in 2016 (CEC 2016c).

Natural Gas

Pacific Gas and Electric (PG&E) also provides natural gas service to the Citrus Heights area. The system receives gas from PG&E’s regional transmission system. The City’s local transmission pipeline runs under Madison Avenue to the south of the project site and under Antelope Road to the north of the project site (PG&E 2018).

The CEC reports that PG&E consumed a total of approximately 4.56 billion British thermal units (MMBtu) of natural gas in 2016, with 1.75 billion MMBtu for residential use. In Sacramento County, total natural gas consumption was approximately 286.88 million MMBtu in 2016, with 182.47 MMBtu for residential use.

For the purposes of this analysis, energy consumption is measured in kWh or MMBtu. One million British thermal units is equivalent to 293.297 kWh.

Conclusion

The project site is located in an area where all public services are available. The introduction of the proposed project to the project area would increase local demands for electricity and natural gas. However, the energy demands of the proposed project would be consistent with the anticipated level of economic development and growth in the region, and SMUD and PG&E would have sufficient available capacity to serve the proposed project.

6.5.2 Regulatory Framework

Federal

Although there are federal regulations addressing energy efficiency in the built environment, fuel efficiency for motor vehicles, energy sources used by the United States, and national conservation goals, none of these regulations and policies applies directly to the proposed project and this analysis of the project’s energy consumption.

State

California Environmental Quality Act

Appendix F of the CEQA Guidelines calls for discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy.

Global Warming Solutions Act

Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006 (Chapter 488, Statutes of 2006) enacted Sections 38500–38599 of the California Health and Safety Code. AB 32 establishes regulatory, reporting, and market procedures to achieve quantifiable reductions in greenhouse gas (GHG) emissions and a cap on statewide GHG emissions. AB 32 requires reduction of statewide GHG emissions to 1990 levels by 2020. The procedures for reducing GHG emissions will relate to the generation and efficient use of energy. The California Air Resources Board adopted the Climate Change Scoping Plan in 2008, which is the state’s plan to achieve the statewide GHG reductions required by AB 32. The most significant proposed GHG reductions are recommended through improving emission standards for light-duty vehicles, implementation of the Low-Carbon Fuel Standard, energy efficiency measures in buildings and appliances, and a renewable portfolio standard for electricity production.

California Energy Commission

The CEC’s Integrated Energy Policy Report set forth policies that would enable the state to meet its energy needs under the carbon constraints established in the 2006 Global Warming Solutions Act. The Integrated Energy Policy Report also provides a set of recommended actions to achieve these policies.

Title 24, California Code of Regulations, Energy Efficiency Standards

Title 24 sets the energy efficiency standards for residential and nonresidential buildings. The CEC has adopted changes to the Building Energy Efficiency Standards to accomplish the following:

- Respond to California’s energy crisis to reduce energy bills, increase energy delivery system reliability, and contribute to an improved economic condition for the state
- Respond to the AB 970 (Statutes of 2000) urgency legislation to adopt and implement updated and cost-effective building energy efficiency standards
- Respond to various statutes of 2001, which included urgency legislation to adopt energy efficiency building standards for outdoor lighting

- Emphasize energy efficiency measures that save energy at peak periods and seasons, improve the quality of installation of energy efficiency measures, incorporate recent publicly funded building science research, and collaborate with California utilities to incorporate results of appropriate market incentives programs for specific technologies

Additionally, the 2013 California Green Building Standards Code, or CALGreen Code (24 CCR 11), which took effect on January 1, 2014, requires buildings to reduce energy and water consumption and establishes specific performance standards that appliances and fixtures must meet. The code contains mandatory and voluntary measures for site planning and design, energy efficiency, water efficiency and conservation, materials conservation, resource use efficiency, and environmental quality.

State of California Energy Plan

The State Energy Plan, drafted by the CEC, identifies emerging trends in energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The plan recommends reductions in congestion and increased efficiency in the use of fuel supplies. The plan also encourages urban designs that reduce vehicle miles traveled (VMT) and promote pedestrian and bicycle access.

California Renewables Portfolio Standard

Under Senate Bill X1-2, signed into law in April 2011, the Renewables Portfolio Standard applies to all electricity retailers in California. These entities must meet the Renewables Portfolio Standard goals of 20% of retail sales from eligible renewables by the end of 2013, 25% by the end of 2016, and 33% by 2020.

California's Energy Storage Law

California's Energy Storage Law (AB 2514) (Chapter 469, Statutes of 2010) requires the governing board of each publicly owned utility to “determine appropriate targets, if any, for the utility to procure viable and cost-effective energy storage systems (California Public Utilities Code Section 2836(b)(1)). AB 2514 also requires that “all procurement of energy storage systems” by a publicly owned utility “shall be cost-effective” (California Public Utilities Code Section 2836.6).

Local

City of Citrus Heights General Plan

The City's General Plan includes the following goals and policies relating to energy use that are applicable to the proposed project (City of Citrus Heights 2011).

Goal 40: Promote energy conservation through appropriate design and construction techniques.

Policy 40.1: Encourage new buildings to maximize solar access to promote passive solar energy use, natural ventilation, effective use of daylight, and on-site solar generation.

Policy 40.2: Promote a climate-appropriate tree planting and maintenance program in order to reduce ambient air temperature on hot sunny days, and require that all tree plantings and outdoor lighting be integrated.

Goal 41: Minimize building energy consumption and transition to clean, renewable energy sources.

Policy 41.1: Require energy-efficient site and building designs in new construction.

City of Citrus Heights Greenhouse Gas Reduction Plan

The City’s Greenhouse Gas Reduction Plan includes the following measures that specifically relate to the proposed project.

Measure 4-1.B: Modify City codes to require new buildings to maximize solar access to promote passive solar energy design, natural ventilation, effective use of daylight, and on-site solar generation.

Measure 4-1.C: Require use of recycled content building materials in new construction projects.

Measure 4-5.C: Improve lighting efficiency and decrease energy consumption in public spaces.

6.5.3 Impacts

Thresholds of Significance

Appendix F of the CEQA Guidelines does not provide a specific numeric threshold to evaluate the potential significance of the energy effects of a proposed project. Rather, the emphasis is on reducing “the wasteful, inefficient, and unnecessary consumption of energy” (Public Resources Code Section 21100(b)(1),(3)). To use this standard as a threshold of significance, the following criteria are considered in this analysis:

Project-related energy usage would be considered “wasteful, inefficient, and unnecessary” if:

- The project were to violate state and federal energy standards, including Title 24 of the California Code of Regulations.

- The project consumed a substantially greater amount of energy, in either the construction or operational phase, than a similar project.
- The project objectives could be achieved through a feasible alternative that would substantially reduce the amount of energy required over the life of the project or through a feasible alternative that would include use of alternative fuels or energy systems.

IMPACT 6-1:	Cause a temporary increase in wasteful, inefficient, and unnecessary energy consumption due to construction.
SIGNIFICANCE:	Less Than Significant
MITIGATION:	None
RESIDUAL SIGNIFICANCE:	Less Than Significant

As discussed in Chapter 3, Project Description, the project would require an approximately 4-year-long construction period. The construction phases anticipated to occur include site clearing, grading, and trenching for utilities followed by building construction, paving, architectural coating, and installation of landscaping. Heavy-duty construction equipment associated with construction activities would rely on diesel fuel, as would haul trucks involved in removing the materials from demolition of the existing on-site buildings.

Heavy-duty construction equipment of various types would be used during each phase of construction. The California Emissions Estimator Model (CalEEMod) analysis discussed in Section 4.7, Air Quality, and included in Appendix D to this EIR, includes the proposed construction schedule and assumed equipment usage. Based on that analysis, over all phases of construction, diesel-fueled, on-site construction equipment would run for an estimated 54,176 hours over the course of all four construction phases, as summarized in Table 6-1.

**Table 6-1
Hours of Operation for Construction Equipment**

Phase	Hours of Equipment Use
Phase 1	14,456
Phase 2	13,240
Phase 3	13,240
Phase 4	13,240
Total	54,176 hours

Source: Appendix D.

Assuming an average diesel fuel efficiency of 1.74 gallons per hour, on-site construction equipment would consume approximately 94,266 gallons of diesel. With a conversion factor of

40.7 kWh per gallon of diesel, the energy consumption due to hauling would be approximately 2,316 kWh (Appendix D).

During the construction phases, it is expected that vendors will travel to and from the site in diesel-fueled vehicles to deliver materials. CalEEMod estimates that 92 total trips will be taken by vendors (over all construction phases, spanning 4 years), which would generate approximately 598 VMT. Assuming an average diesel fuel efficiency of 6 miles per gallon (EIA 2013), vendor trips would consume approximately 100 gallons of diesel fuel. With a conversion factor of 40.7 kWh per gallon of diesel, the energy consumption due to vendor trips to and from the site would be approximately 4,070 kWh.

The number of construction workers required would vary based on the construction phase and activity. The fuel construction workers would require for transportation would depend on the total number of worker trips estimated for the duration of construction activity. CalEEMod estimates that construction will generate 777 worker trips (over all construction phases, spanning 4 years), which would generate approximately 7,770 VMT. Assuming an average fuel efficiency of 17.5 miles per gallon (DOT 2014), demolition and construction activities on site would use approximately 444 gallons of gasoline for construction worker trips. With a conversion factor of 33.7 kWh per gallon of gasoline, the annual energy consumption due to gasoline-fueled transportation by construction worker trips to and from the project site would be 14,963 kWh.

According to a 2012 study by the U.S. Energy Information Administration, California's transportation sector consumed a total of 14.1 billion gallons of gasoline and 3 billion gallons of diesel in a single year, which indicates an average of 38.6 million gallons of gasoline and 8 million gallons of diesel are consumed daily statewide. Further, the Sacramento County GHG inventory indicates that a total of 187 million gallons of gasoline and 38.6 million gallons of diesel fuel are consumed in the region annually. Based on the fuel usage amounts presented in the previous text, construction of the proposed project would use approximately 444 gallons of gasoline and 100 gallons of diesel over the four years of project construction. This would comprise less than 0.1% of the annual total gasoline and diesel fuel consumption in the Sacramento region.

Temporary electric power for as-necessary lighting and electronic equipment such as computers inside temporary construction trailers would be provided by SMUD. The electricity used for such activities would not result in a net increase in on-site electricity use over the existing buildings' electricity usage, as the daily demand for lighting and electronics at the buildings currently on site would be higher than that for construction.

Project construction would also involve use of non-renewable or slowly renewable resources used to create building materials including certain types of lumber and other forest products;

aggregate materials used in concrete and asphalt such as sand, gravel, and stone; metals such as steel, copper, and lead; petrochemical construction materials such as plastics; and water.

Table 6-2 summarizes the energy consumption associated with construction at the project site. This reflects the total amount of energy consumption over the 4-year construction period.

Table 6-2
Energy Consumption from Construction

Source	Kilowatt Hours (kWh) Consumed
Diesel-fueled, on-site construction equipment	2,316
Vendor trips	4,070
Construction worker trips	14,963
Total	21,349 kWh

Source: Appendix D

Construction would comply with all relevant energy-related regulations by conserving energy and natural resources to the extent feasible. The energy demands due to diesel and gasoline use during construction would be small relative to statewide and local demands for fuel use, as discussed previously. The energy consumption during project construction would be commensurate with typical construction projects and would not use energy wastefully or inefficiently. Therefore, the temporary short-term consumption energy consumption impacts due to construction are considered **less than significant**.

IMPACT 6-2: Cause a permanent increase in wasteful, inefficient, and unnecessary energy consumption or fail to comply with state and federal energy standards.

SIGNIFICANCE: Less Than Significant

MITIGATION: None

RESIDUAL SIGNIFICANCE: Less Than Significant

The total annual energy demands of the proposed project are described and quantified in the following text.

Daily Operations

As discussed in Chapter 3, Project Description, the project proposes to construct 260 dwelling units. The project would also construct a new circulation system throughout the proposed project and would install landscaping and recreational facilities. The addition of 260 units is expected to result in approximately 663 new residents.

The daily operation of the proposed project would generate demand for electricity, natural gas, and water supply, as well as generating wastewater requiring off-site conveyance, treatment, and disposal.

SMUD uses a variety of renewable energy sources to generate a portion of its electricity, and these sources would contribute to the project's electricity supply. Due to the nature of the project site, which is located in a developed, landlocked area, it would be infeasible to use on-site renewable energy sources such as hydropower, biodiesel, or ocean-dependent technologies.

The CalEEMod program estimates energy usage associated with building systems that are regulated under Title 24 (such as the heating and cooling system), lighting, and use of office equipment, appliances, plug-ins, and other sources not covered by Title 24.

The CalEEMod modeling results also indicate that the single-family residential component of the proposed project would consume 3,760,880 kilowatt hours (kWh) of natural gas annually, and 2,015,110 kWh of electricity annually.

The CalEEMod modeling estimates that the proposed project would generate approximately 1,562 daily vehicle trips during the week, and an additional 1,554 daily trips on Saturdays and 1,336 daily trips on Sundays. Using the default assumptions in CalEEMod regarding trip length and total VMT, the project is expected generate a total of 3,923,067 VMT annually. Assuming an average fuel efficiency of 17.5 miles per gallon (Economic Perspective 2013), the proposed project would increase consumption of gasoline by 224,175 gallons annually. With a conversion factor of 33.7 kWh per gallon of gasoline, the annual energy consumption due to these trips would be 7,554,698 kWh.

There would be an increase in local energy consumption due to the proposed project. However, because the project would incorporate energy-efficient elements, the energy consumption of the proposed project would not be wasteful or inefficient. The demand for housing in the City demonstrates that the energy consumption used by this or any project would not be unnecessary. Therefore, the impact of energy consumption at the proposed project is considered **less than significant**.

Additional Project Design Features

CEQA Guidelines, Appendix F, Energy Conservation, states that the “goal of conserving energy implies the wise and efficient use of energy.” It lists three means of achieving this goal: decreasing overall per capita energy consumption, decreasing reliance on fossil fuels, and increasing reliance on renewable energy sources” (14 CCR 15000 et seq.). Public transit, such as fixed bus routes, reduce vehicle trips and result in decreased demand for transportation-related energy. The project site is accessible to a number of bus routes.

The project would create a walkable neighborhood with pedestrian trails through the residential and open-space components of the proposed project.

Additionally, the proposed project would include the use of recycled materials in construction and the recycling or reuse of construction materials and debris, and would include other energy conservation features such as providing street and landscape trees to reduce heat gain in the residences, installation of Energy Star appliances, and provision of rooftop solar generation.

Conclusion

Overall, the proposed project would result in an increase in energy consumption, with the project requiring a total of 7,554,698 kWh associated with vehicle trips to/from and within the project site, 2,015,110 kWh in on-site electricity consumption, and 3,760,880 kBtu in on-site natural gas consumption. As noted in Section 6.5.1, Energy Setting, the project’s energy demands would be consistent with the anticipated level of economic development and growth in the region. The demand for housing in the project area demonstrate that the energy consumption of the proposed residences would not be unnecessary. Therefore, impacts related to wasteful, inefficient, or unnecessary energy consumption would be **less than significant**.

IMPACT 6-3:	The proposed project objectives could be achieved through a feasible alternative that would substantially reduce the amount of energy required over the life of the project or through a feasible alternative that would include use of alternative fuels or energy systems.
SIGNIFICANCE:	Less Than Significant
MITIGATION:	None
RESIDUAL SIGNIFICANCE:	Less Than Significant

As discussed under Impacts 6-1 and 6-2, the proposed project would have a less than significant impact related to energy consumption during construction and during project operation. The approximate amount of energy consumed by the project is also identified previously. CEQA Guidelines, Appendix F, Energy Consumption, states that the alternatives in an EIR should be compared “in terms of overall energy consumption and in terms of reducing wasteful, inefficient and unnecessary consumption of energy” (14 CCR 15000 et seq.). The analysis of project alternatives provided in Chapter 5 of this EIR includes consideration of whether any of the feasible project alternatives would substantially reduce the amount of energy required over the life of the project and finds that each of the alternatives would result in similar overall energy consumption compared to the proposed project. None of these alternatives would result in a more efficient use of energy. Further, the proposed project is not considered to be growth inducing; rather it would help meet the current and projected demand for housing in the City. No project alternatives have been

identified that would substantially reduce the energy demands associated with the proposed project and this impact is considered to be **less than significant**.

6.5.4 Mitigation Measures

No mitigation measures are required.

6.6 REFERENCES

14 CCR 15000–15387 and Appendices A–L. Guidelines for Implementation of the California Environmental Quality Act, as amended.

California Code of Regulations, Title 24, Part 11. California Green Building Standards Code.

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