TRACY NATURE PARK

Master Plan

March 2021

ACKNOWLEDGMENTS

The **City of Tracy** thank all who participated in the development of this Tracy Nature Park Master Plan

PARKS AND COMMUNITY SERVICES COMMISSION

Nancy Young, Mayor
Veronica Vargas, Mayor Pro Tem
Dan Arriola, Council Member
Mateo Bedolla, Council Member
Eleassia Davis, Council Member
Robert Rickman (Former Mayor)
Rhodesia Ransom (Former Council Member)

STAKEHOLDER ORGANIZATIONS

Tracy Nature Park Advocates

MEMBERS OF THE TRACY COMMUNITY

All of you who participated in workshops and showed an interest for the creation of Tracy Nature Park

CITY OF TRACY CALIFORNIA
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TABLE OF CONTENTS

1 EXECUTIVE SUMMARY

A group within the greater Tracy community banded together with an aspiration to establish a nature park. The City Council responded to their request by designating 86 acres on the northern boundary of Tracy (near the sports complex of Legacy Fields) to be transformed from agricultural fields to a nature refuge for the community.* In 2019 WRT was hired by the City of Tracy to define a vision for the park through community engagement and research. Site analysis included documenting the life that exists near and within the site. Research uncovered the evolution of the landscape from the early 1800's delta ecosystem to its present-day condition of channelized canals and agricultural fields. A series of community engagement events defined a vision for the Tracy Nature Park. The combination of analysis and community vision led to a Master Plan which provides the foundation for a legacy for the community of Tracy.

**In the early 2000s, a 150 acres was authorized by the United States Congress to be conveyed by the General Services Administration to the City pursuant to special legislation enacted in 1998. The special legislation provided that the 150 acres were to be transferred, at no cost, to the City for educational and/or recreational "public benefit" purposes. After analyzing the 150 acres for educational and/or recreational "public benefit" purposes, the City concluded that this type of use for the property was no longer viable and staff began developing alternative use options for the site. After numerous discussions between GSA and City staff, a concept was conceived whereby the use restrictions and revisionary rights recorded on the 150 acres at the Schulte Road property could be transferred to other undeveloped park property in the City. Since then, the development of Legacy Fields re-focused the City's effort to develop that part of Tracy into a recreational use area based on location and land use planning efforts. A major component of this transfer is a public use plan that details the City's plans for the entire replacement property with a development schedule. The public use plan is congruent with the vision to develop the Legacy Fields area into an active and passive recreational use area. This 86-acre parcel will help fulfill that vision.*

WHAT IS A NATURE PARK?

Nature. A word often used, but much more difficult to define. A local version of nature was defined by the community of Tracy. Through workshops and site analysis, a vision was defined which will provide the framework for the establishment of Tracy Nature Park.

word cloud from a summary from the The Tracy Nature Park kickoff

"PASSIVE, NATURAL, DRAW[ING] ON TRACY'S ECOLOGY, WATER, TREES, AND WILDLIFE."

"ZEN-LIKE REFUGE, GIVING PEOPLE IN TRACY A PLACE TO INTERACT WITH NATURE AND SOLITUDE IN A WAY THAT IS CURRENTLY LACKING"

workshop participant responses in defining a vision for Tracy Nature Park

NATURE LOST

The Central Valley was once home to several indigenous tribes that depended on the inverted-delta ecosystem which was unlike any in the world. During the 1800's, a desire to use the landscape for agricultural purposes resulted in the channelization of this novel ecosystem. The site selected for Tracy Nature Park was once a pattern of ecosystems including grasslands, tidal freshwater wetland, non-tidal freshwater wetland and seasonal wetland. The variety of ecosystems is due in large part to the fact that the site's average elevation is just a few feet above sea level resulting in a dynamic hydrological system reflected by seasonal change.

Robinson, A.; Safran, S. M.; Beagle, J.; Grenier, J. Letitia; Grossinger, R. M.; Spotswood, E.; Dusterhoff, S. D.; Richey, A. 2016. A Delta Renewed: A Guide to Science-Based Ecological Restoration in the Sacramento-San Joaquin Delta. Delta Landscapes Project. Prepared for the California Department of Fish and Wildlife and Ecosystem Restoration Program. A Report of SFEI-ASC's Resilient Landscapes Program. SFEI Contribution No. 799. San Francisco Estuary Institute - Aquatic Science Center: Richmond, CA.

This early 1900s photograph showing early dredging work on a levee. (Covello ca. 1900, courtesy of Bank of Stockton Historical Photograph Collection)

Habitat complexity of the South Delta. Laura Cunninghamby, artists, naturalist.

NATURE FOUND

Upon visits to the Nature Park site, the seemingly barren landscape reveals that life does, in fact exist. A river otter was observed commuting between agricultural ditches. The hum of birds was heard and a dense flock was seen feeding on a flooded agricultural field just to the north. A couple miles away a remnant riparian ecosystem exists along the Old River that provides a sample of what could one day exist on the site of Tracy Nature Park.

For a full site analysis conducted by WRT see appendix D which also includes a list of observed species.

At the north-west edge of the site a flooded agricultural field provides habitat for several species of birds and even a river otter. WRT

Native Oak stand along the Old River just a few miles from Tracy Nature Park. WRT

NATURE CREATED

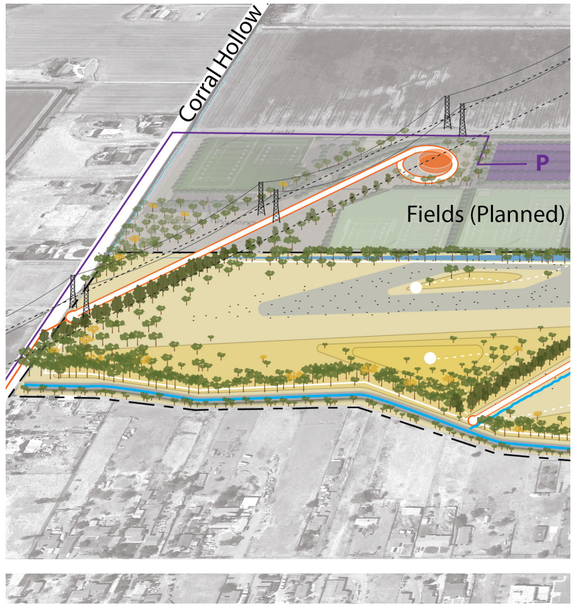
While the 1800's witnessed the rapid conversion of ecosystems into agriculture in the Central Valley, another movement was taking place in metropolitan cities around the world. The value of inserting nature into urbanized areas was being recognized and massive public projects were occurring from New York's Central Park to San Francisco's Golden Gate Park. These parks were designed in a way to appear as if they were sculpted by nature itself. While beautiful and treasured, these parks require significant maintenance and irrigation while providing minimal ecological function. As the community of Tracy has determined that a functioning ecology and respite from urban life are a priority, Tracy Nature Park will be implemented in a way where ecology is given equal weight to creating an environment for the human.

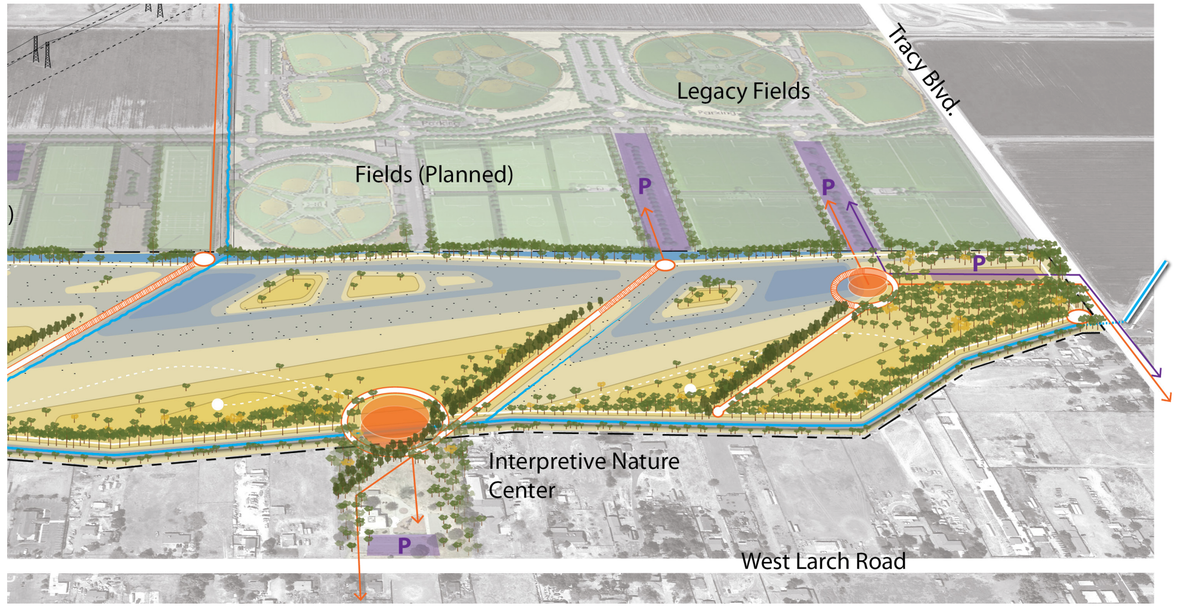
A naturalistic park in Munich, Germany

Illustrative Bird's-eye View of Golden Gate Park - 1892

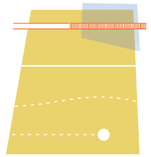
NATURE ENABLED

The conceptual Master Plan for Tracy Nature Park builds a framework which allows nature to be the actor. The park concept features structured walkways adjacent to wind-breaks that echo the cultural context of the Central Valley and provide a means for protected access while elevating users from sensitive habitat areas. The landscape is allowed to flow below elevated walks. Earth-moving creates a subtle topography allowing for a range of number of habitats to emerge. As the natural landscape evolves, and with the helping hand of the community, what will emerge will be a nature authentic to Tracy, California.





- Grassland
- Open Water
- Wet Meadow (Seasonal)
- Woodland
- Windbreak



- Accessible Pedestrian Trail/Bridge
- Multi-Use Path
- Earthen Trail
- Overlook

- P Automobile / Parking
- Pedestrian Connection
- Trailhead
- Trailhead Building (With Restroom/Maintenance/Education)

- Property Line
- Concrete Irrigation Canal
- Vegetated Ditch/ Canal

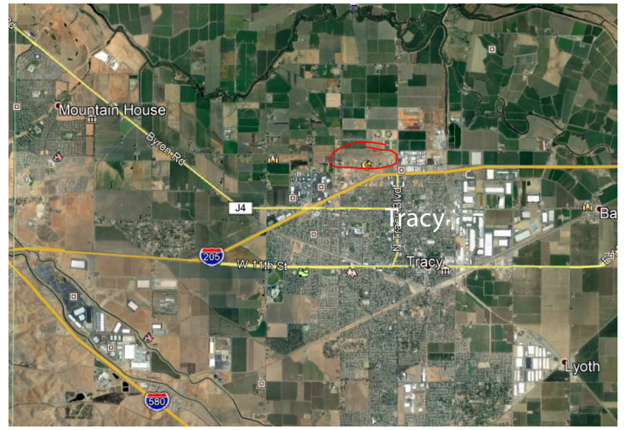
N

0′ 300′

2 THE LAND

2.1 CONSTRAINTS AND OPPORTUNITIES

2.2 ECOLOGICAL POTENTIAL

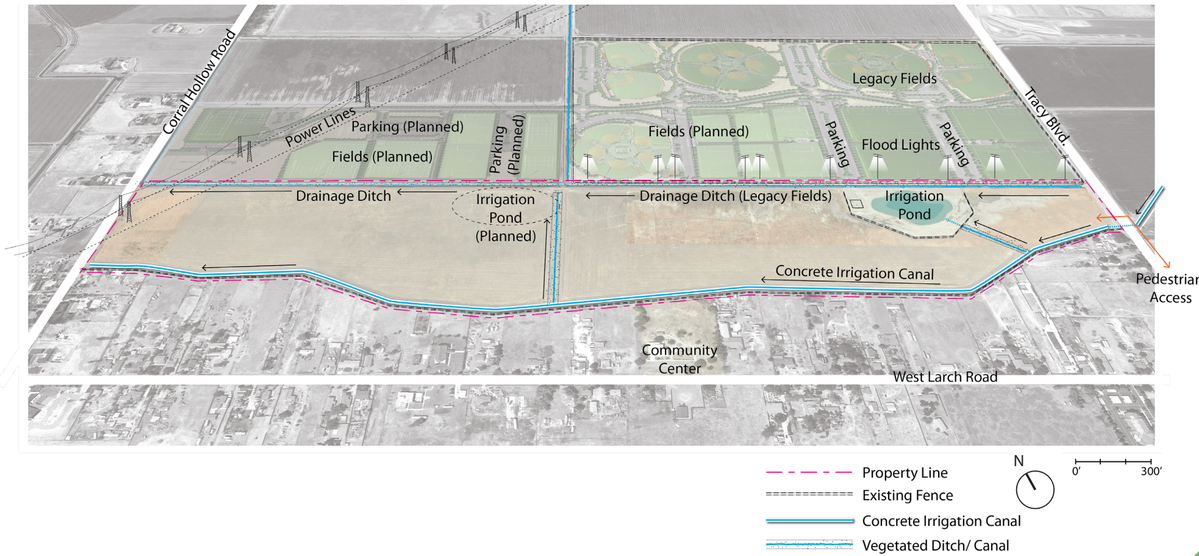


While the site of the potential Tracy Nature Park can feel barren today, a walk around the open field reveals that life is indeed present.

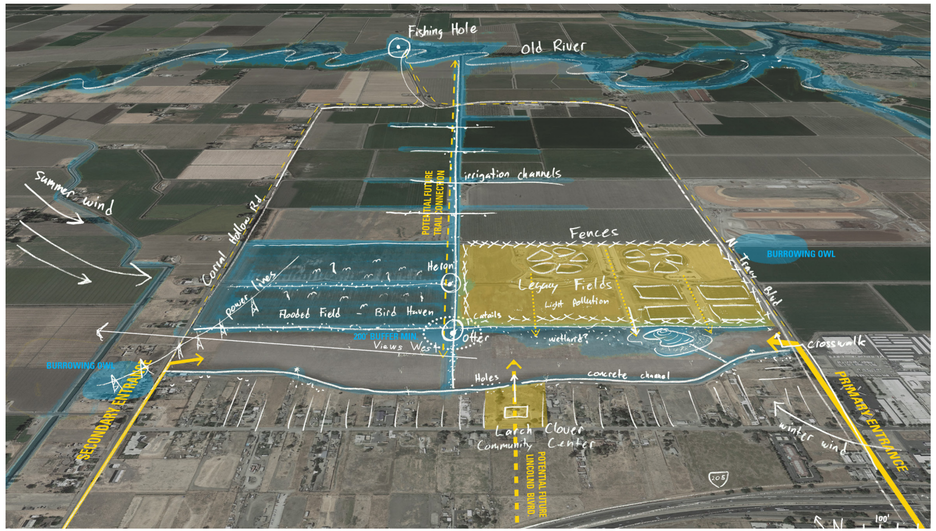
CONSTRAINTS & OPPORTUNITIES

The context of the Tracy Nature Park site provides a range of constraints, but equally a number of opportunities including:

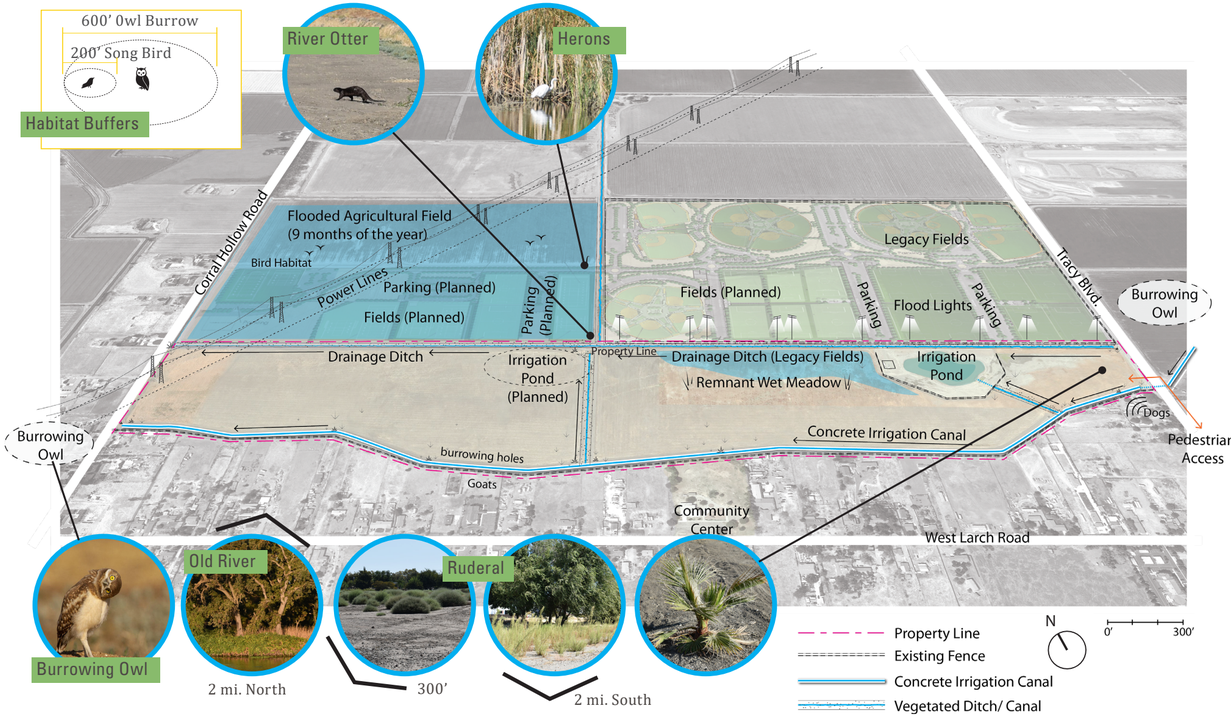
- Existing infrastructure such as power lines and irrigation canals on the site must remain, but provide an opportunity to tell the cultural story of the central valley as it relates to wind, water, and power.
- A large irrigation pond will remain as a source of water for the Legacy Fields Sports Complex, but may be modified and integrated into the Nature Park to provide a greater ecological value.
- Legacy Fields to the north provides opportunities to attract people by providing trail-heads and sight-lines into Nature Park. Challenges to be address are light pollution from the fields which could disrupt sensitive species if not properly buffered. Additionally, run-off from the fields will require appropriate bio-filtration to ensure algae blooms do not disrupt the nutrient balance of the aquatic habitats of Nature Park. See Appendix B for diagrams representing how topography modification might provide a solution for treating potential contaminants.
- Given the site's low elevation (just a few feet above sea level) the water table is anticipated to be just below the surface. The high water table is an opportunity to support a diversity of habitats with seasonal variety. The high water table could also result in flooding; a properly designed Nature Park might buffer the adjacent Larch Clover community from existing flooding risks. It is recommended that appropriate engineering studies be conducted to better understand the existing hydrology of the site prior to the next phase of design.
- Preliminary soil samples taken from Legacy Fields suggest high levels of boron which may discourage the establishment of several species. Boron can be leached out of the soil, but given the high water table the boron would likely be brought back up to the surface during a wet season. If soils were first mounded well above the highest anticipated water table the strategy of watering might be successful. Further soil samples should be taken in order to better understand the conditions of the site before the next phase of design. See Appendix B for diagrams of possible solutions through berming.
- Funding for implementation and maintenance are undefined at this time. Grant funding opportunities may be pursued as well as the potential for private donors that might be interested in leaving their name as part of the legacy of Tracy Nature Park.



ECOLOGICAL POTENTIAL



As discovered during site visits, a surprisingly rich ecology already exists around the site. Many of these pioneer species were mapped and assisted in defining metrics for the design framework. Buffer distances for sensitive species will be important to incorporate into the path network. Fortunately, the site is large enough to accommodate several of these buffers while maintaining access for visitors of the park. See Appendix D for a full list of observed species as well as Appendix F for a list of species that might be anticipated to call Tracy Nature Park home.

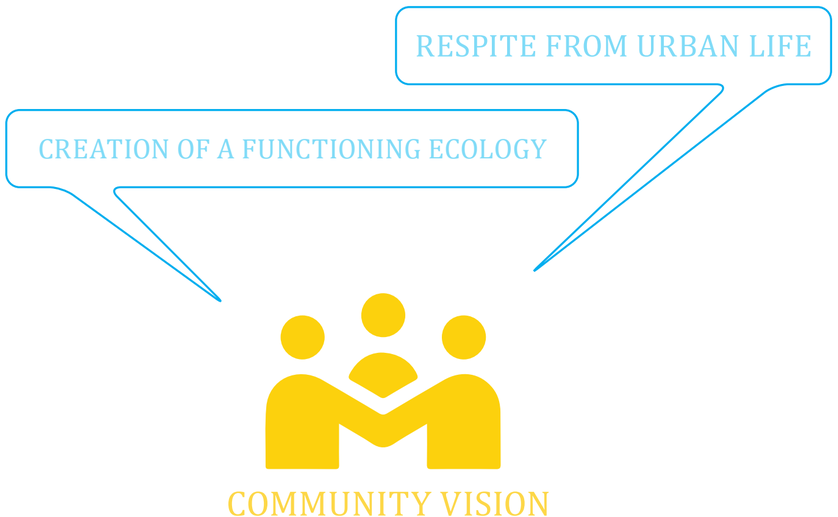


3 COMMUNITY VISION

The vision for Tracy Nature Park started with a vigorous community engagement process which included a series of presentations, engagement events, and site visits. Design elements were presented and the feedback was documented and incorporated into the framework for the Tracy Nature Park Master Plan.

A kick-off for the Nature Park Master Plan included a site visit to the future home of Nature Park. Community members were able to see the existing irrigation pond, canal, feel the wind and sounds of the birds, freeway and sense the strong afternoon sun. The community then broke into groups where they discussed the specific elements of the site and presented their findings to the larger group.

COMMUNITY ENGAGEMENT



Two major themes emerged from the kickoff event which provided the vision for the conceptual master plan. The community acknowledged that these themes are not mutually exclusive and instead have some level of co-dependency.

ELEMENTS TO INTEGRATE INTO TRACY NATURE PARK:

- Nature trails
- Native plants & woodlands
- Wet meadow
- Habitat buffers & islands
- Multi-use trail on periphery open to bikes and dogs*
- Interior trails to be for passive use/ hiking only
- Benches with appropriate spacing for elderly on trail loops
- Outdoor classrooms
- Pollinator & demonstration gardens
- Facilities - with appropriate budget for management/maintenance
- Disc golf*
- Gathering and contemplative space
- Boardwalks over sensitive areas
- Berms with overlooks
- Protection from westerly winds
- Dedicated parking
- Interpretive Nature Center

GATHERING AND CONTEMPLATIVE SPACES

WET MEADOW LANDSCAPE

OAK WOODLAND

OUTDOOR CLASSROOM

NATURE TRAIL

INTERPRETIVE NATURE CENTER

NATURE TOURS / VOLUNTEER OPPORTUNITIES

ELEVATED WALKWAYS

MULTI-USE TRAIL*

List compiled based on a series of community workshops.

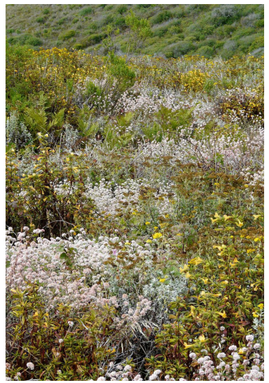
*Any active uses within the park should be managed to be consistent with the ecological and nature-based vision. If such active uses are deemed to be detrimental to the ecological value, or passive user experience of the Nature Park the use may not be permitted.

4 DESIGN FRAMEWORK

The community engagement events and site analysis lead to design framework which guide the concept of the Tracy Nature Park Master Plan. Habitat types were identified which historically existed within close proximity to the site. Ecological succession was defined as a management tool to aid in the evolution of Tracy Nature Park. Experiences are illustrated that enable visitors to feel a sense of refuge in a natural setting.

HABITATS

GRASSLAND

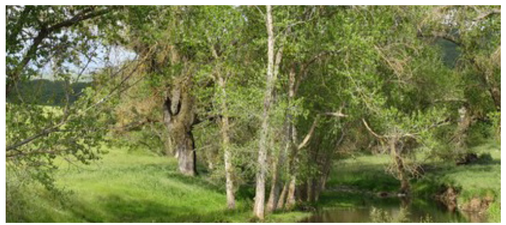


Low herbaceous communities occupying well-drained soils and composed of native forbs and annual and perennial grasses and usually devoid of trees. Few to no vernal pools present.

Species: Lasthenia californica - Plantago erecta - Vulpia microstachys (California goldfields - Dwarf plantain - Six-weeks fescue flower fields), Elymus triticoides (Creeping rye grass turfs) , Nassella pulchra, Eschscholzia (californica) (California poppy fields) , Amsinckia (Fiddleneck fields) , Plagiobothrys nothofulvus (Popcorn flower fields)

OAK WOODLAND

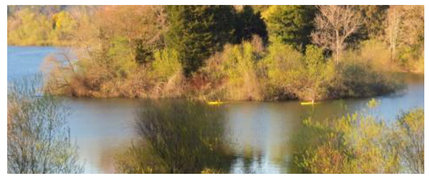




Oak dominated communities with sparse to dense cover and an herbaceous under-story.

Species: Quercus agrifolia, Quercus lobata, Quercus wislizeni, Quercus douglasii

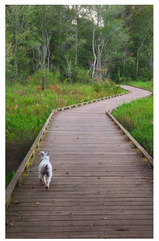
OPEN WATER

Permanently flooded depressions, largely devoid of emergent palustrine vegetation. These occupy the lowest-elevation positions within wetlands.

Species: Azolla (filiculoides, mexicana) (Mosquito fern mats) , Stuckenia (pectinata) - Potamogeton spp. (Pondweed mats), Nuphar polysepala (Yellow pond-lily mats)

WET MEADOW


Perennially wet, high water table, dominated by emergent vegetation. Woody vegetation (e.g., willows). Wetted or inundated by spring tides at low river stages (approximating high tide levels).

Species: Schoenoplectus acutus (Hardstem bulrush marsh), Schoenoplectus californicus (California bulrush marsh), Typha (domingensis, latifolia) (Cattail marshes), American bulrush marsh, California bulrush marsh, Juncus effusus (Soft rush marshes), Juncus articus (Baltic and Mexican rush marshes), Salix lucida (Shining willow groves), Eleocharis macrostachya (Pale spike rush marshes)

Source: Robinson, A.; Safran, S. M.; Beagle, J.; Grenier, J. Letitia; Grossinger, R. M.; Spotswood, E.; Dusterhoff, S. D.; Richey, A. 2016. A Delta Renewed: A Guide to Science-Based Ecological Restoration in the Sacramento-San Joaquin Delta. Delta Landscapes Project. Prepared for the California Department of Fish and Wildlife and Ecosystem Restoration Program. A Report of SFEI-ASC's Resilient Landscapes Program. SFEI Contribution No. 799. San Francisco Estuary Institute - Aquatic Science Center: Richmond, CA.

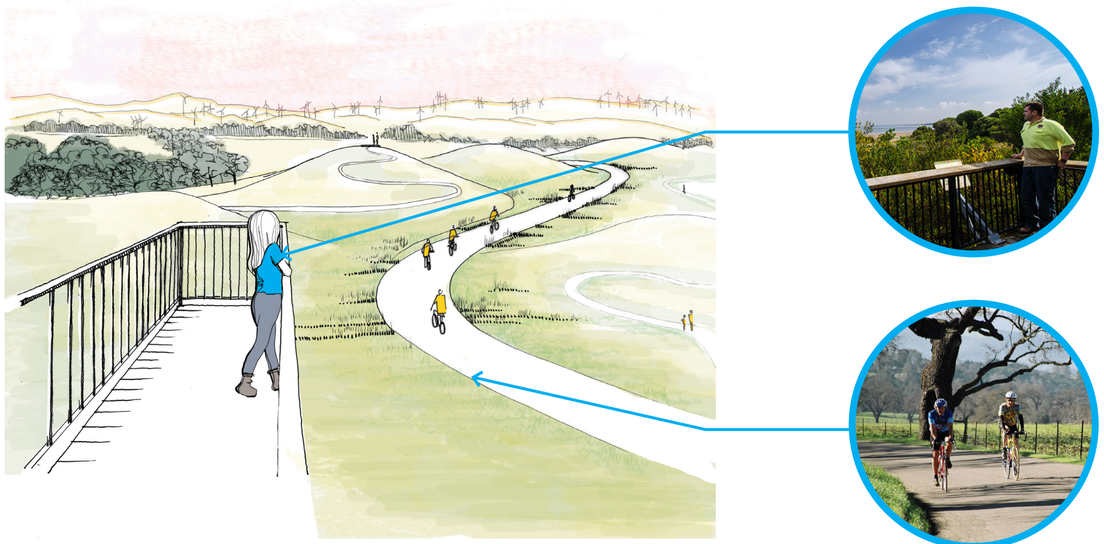
SUCCESSION & MANAGEMENT

Maintenance and management will be critical to the long-term success of Tracy Nature park. A process-based strategy incorporating succession has been proposed for Tracy Nature Park. The gradual and natural transition of plant communities from one ecology to another; is called ecological succession. Through understanding the evolution required for certain habitats to be achieved, a successful management plan can be carried out which embraces change as part of the process. Rather than try to establish a habitat "overnight," the Nature Park Master Plan proposes to lay the foundation for a 'succession-based design' in which establishment of habitats occur when site conditions are appropriate. This process can be 'induced' through land-form modification, planting, irrigation, and specific management practices such as grazing, and controlled burns. Given uncertainty in the site hydrology, succession-based design allows for flexibility in the exact locations of habitat that might also change through different times of the year and during different climatic conditions. This will add an additional layer of seasonality ensuring the experience of Tracy Nature Park is ever changing.

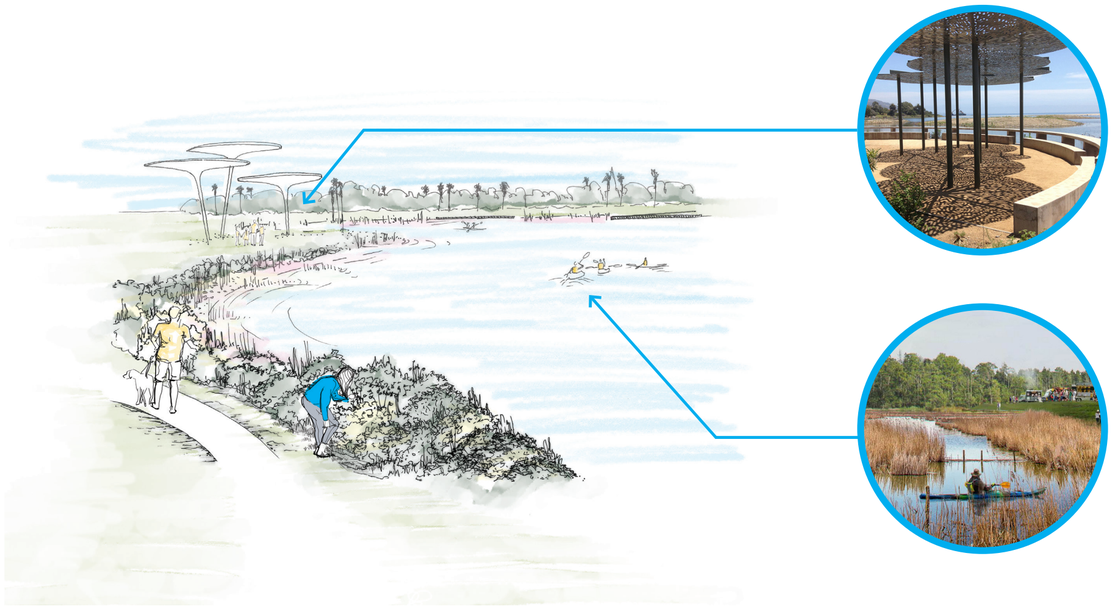
**Management of certain noxious species will be required.*
Seeding of a grass mix (native or non-native) will reduce maintenance and provide habitat but will require fire management.

**Planting of certain species such as Black Walnut, certain Eucalyptus, Willow, Cottonwood, Oaks, Coyote Bush, and White Alder can be explored*

EXPERIENCE

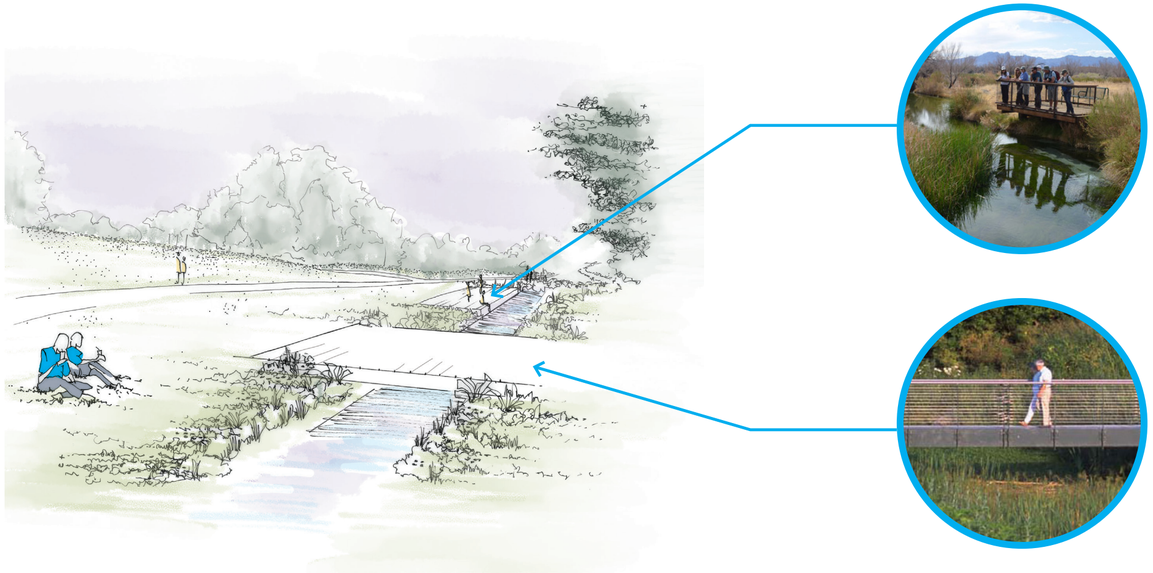


TRAILS

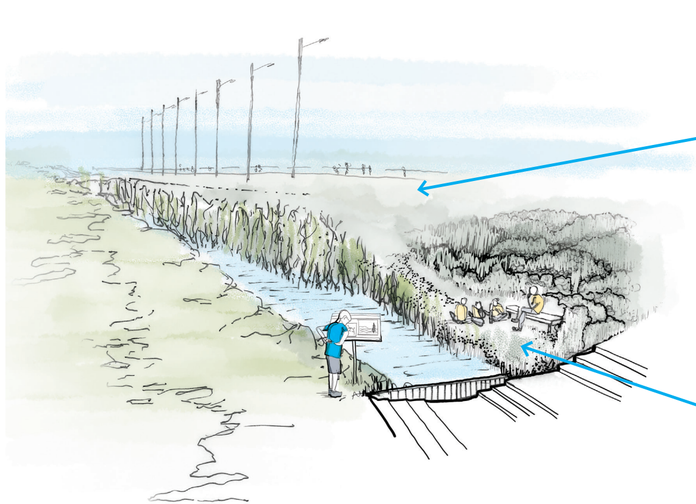


WATERFRONT ACCESS

EXPERIENCE

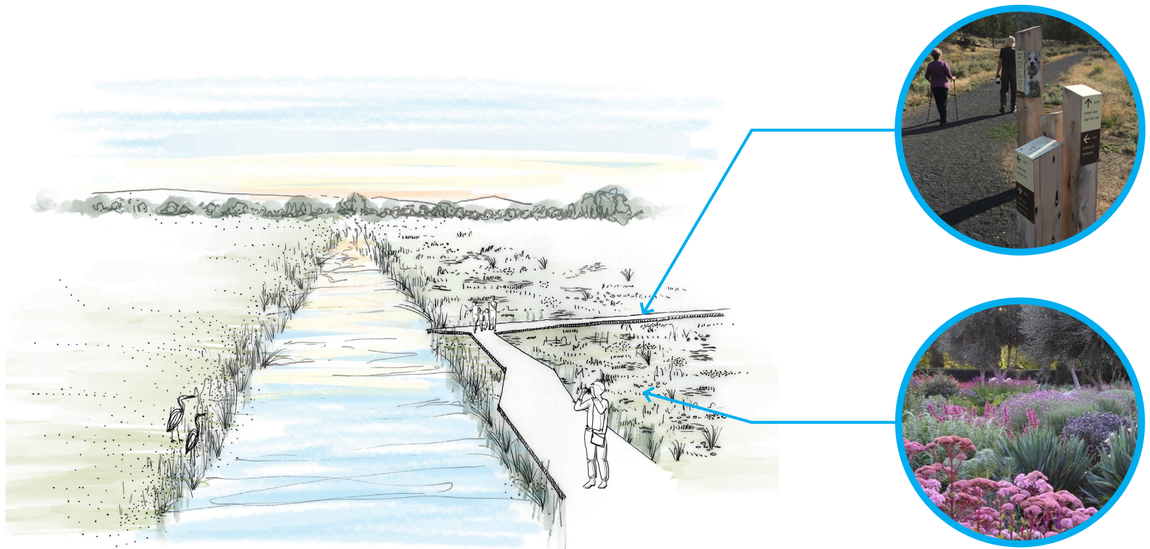


BRIDGE CONNECTIONS

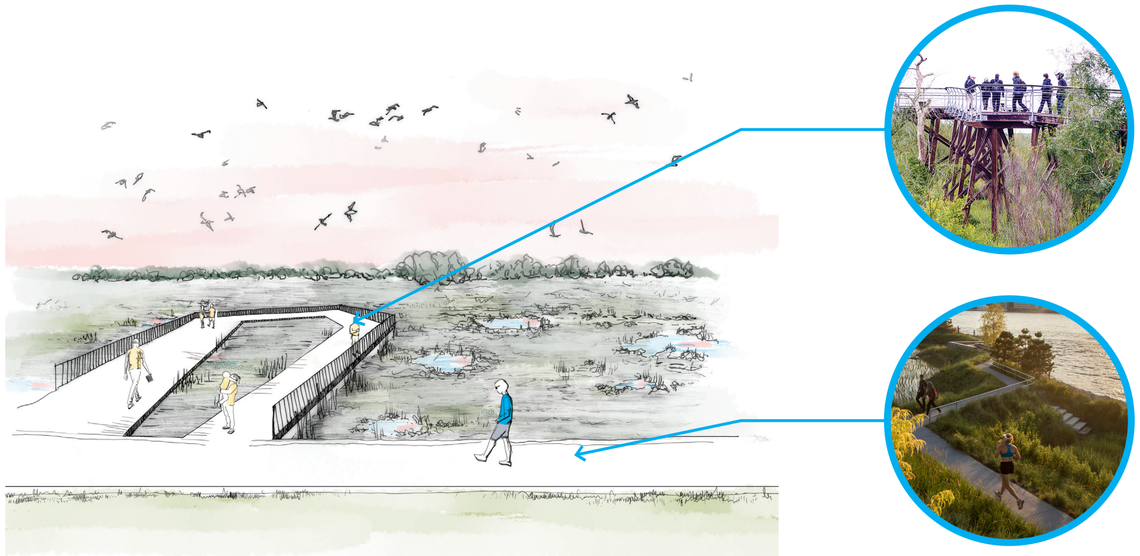


OUTDOOR CLASSROOMS

EXPERIENCE



ENVIRONMENTAL EDUCATION

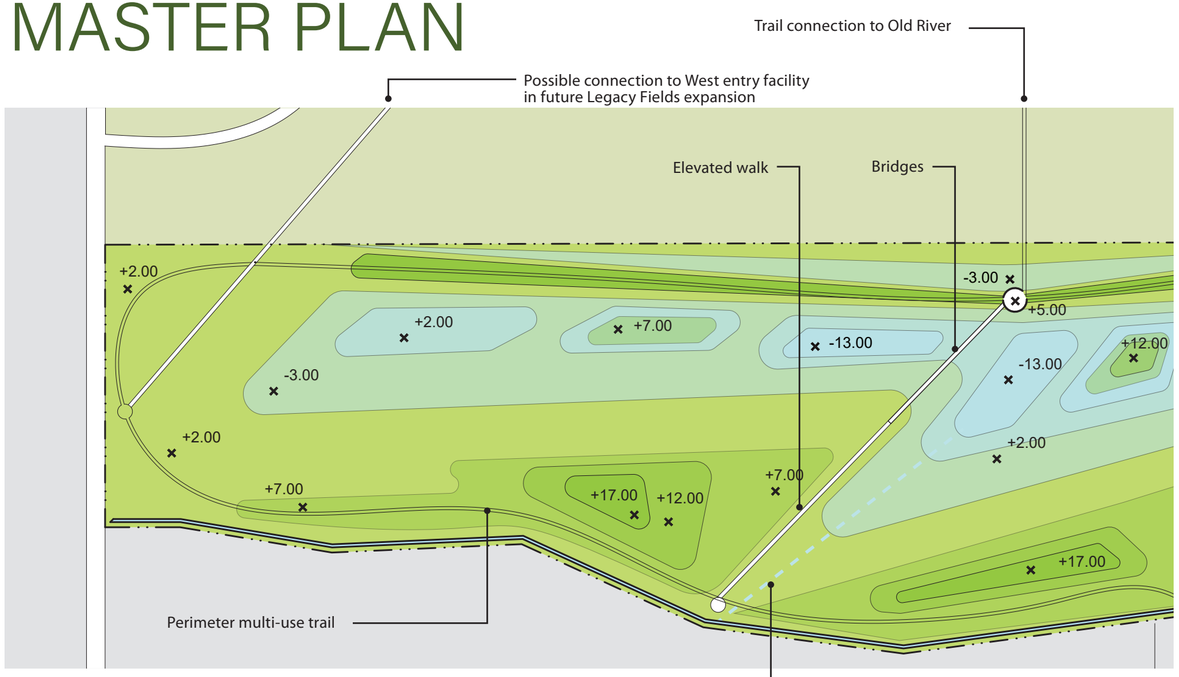


VIEWING PLATFORMS

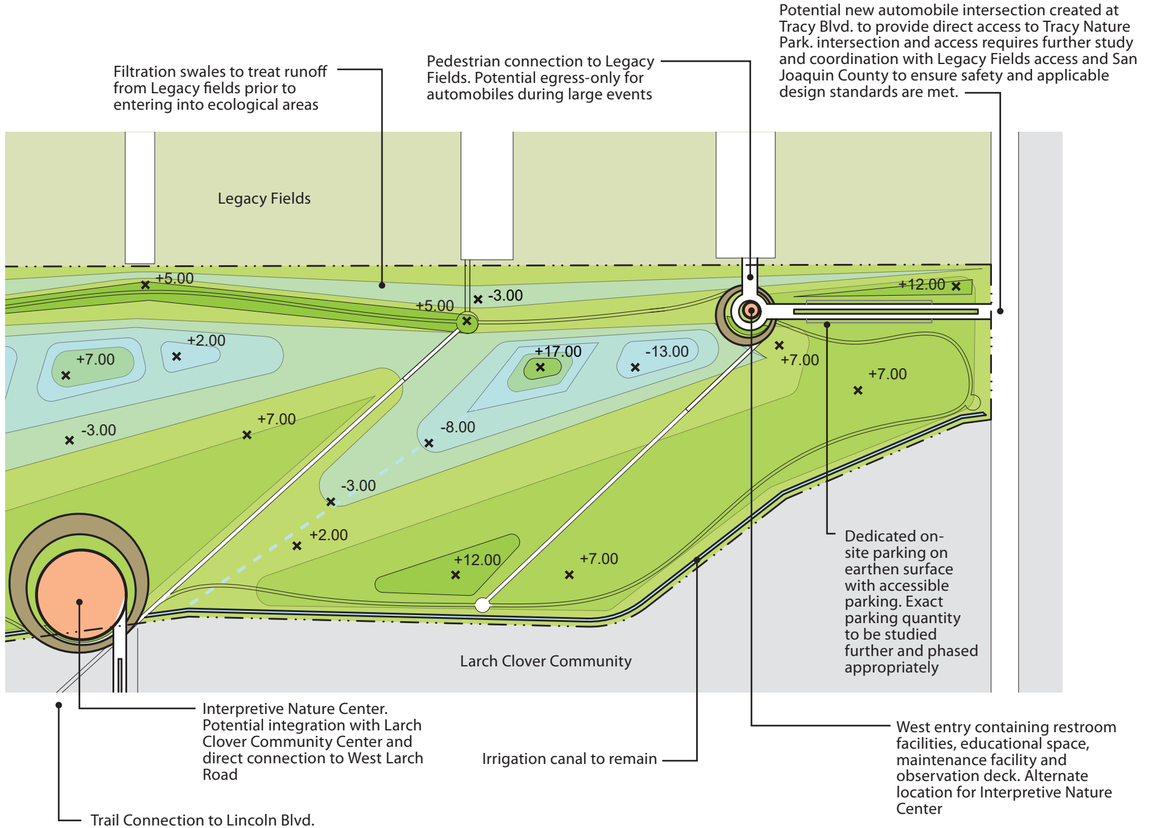
5 THE CONCEPT

The conceptual design of Tracy Nature Park was the result of community input and informed by site analysis. The community identified the need for a nature park to serve as a retreat from urban life in parallel to providing a home for habitat. The challenge for designers was to create a park where this ecology could flourish while maintaining the ability for the community to immerse themselves in a natural environment. The solution was to limit the intensive human use to the periphery and a series of diagonal cuts across the landscape. Initial earth moving maximizes the variety of environments that can establish themselves. The landscape remains free to change over time as the major walks would be in the form of elevated bridges providing a degree of separation between people and sensitive habitat. Earthen hiking trails can be found between these cuts to give users an ability to more deeply immerse themselves in the natural environment.

MASTER PLAN



*All phases identified in this report are a guideline but park improvements could occur as funds become available without regard to specified phases



ELEMENTS

VEGETATION

Planted windbreaks to provide protection from the westerly winds along structured trails and reference the cultural landscape of the Central Valley. A planted woodland ecosystem would be established along the east entry. Buffer planting would filter out light and sound pollution from Legacy fields to the north and filter views into residential backyards of the Larch Clover community to the south.

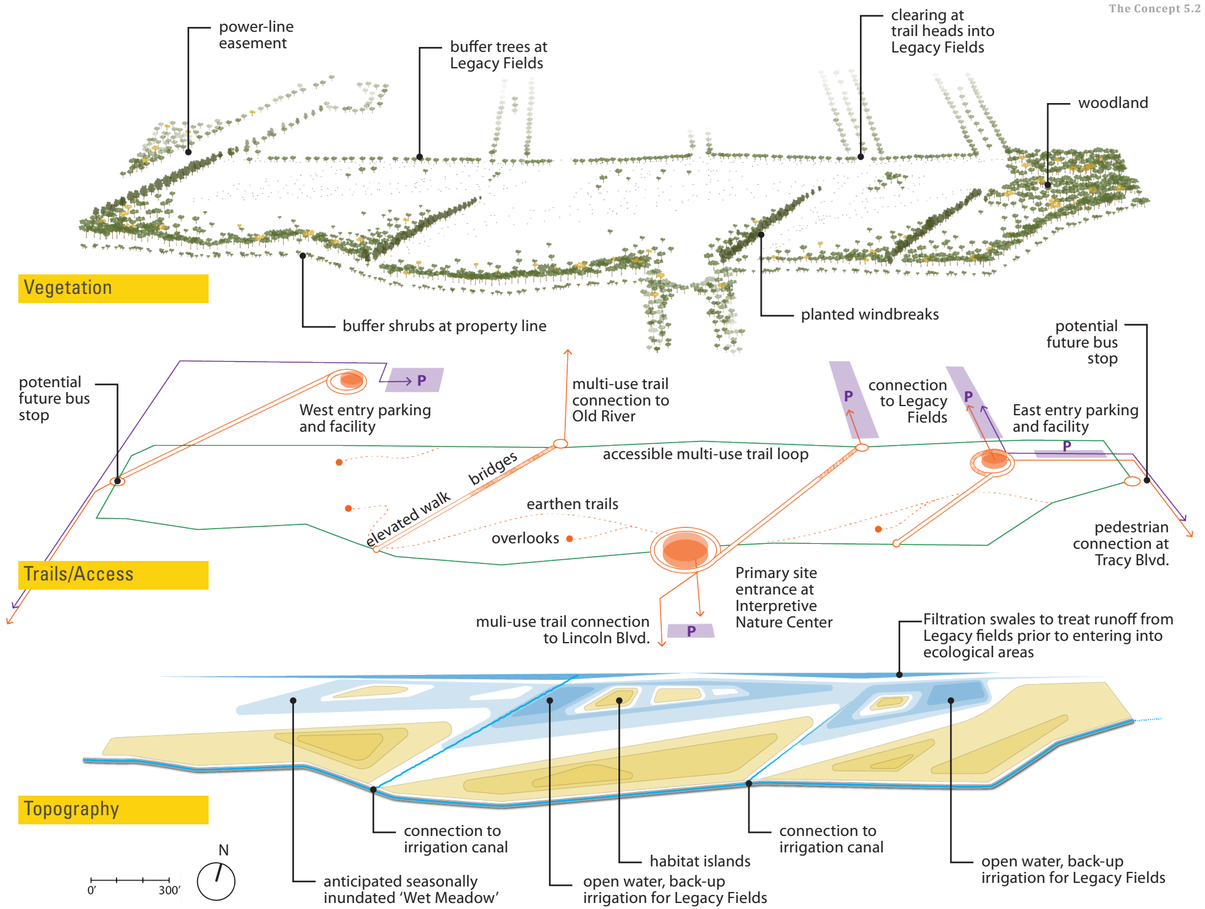
TRAIL / ACCESS

Primary access would occur along Tracy Blvd. With the establishment of an Interpretive Nature Center, the primary entrance may shift to West Larch Road* Additionally a west entry may be introduced with the expansion of Legacy Fields. A peripheral accessible multi-use trail would be open to more active users such as bikes while all internal trails would be limited to the passive experience of the user. Bridges and elevated walks would run across the site diagonally with elevated bridges providing views of wet meadows without impacting sensitive habitat. Multi-use trails should connect off-site to future expansion of Lincoln Blvd to the south and north to the Old River. Integration with regional transit system and the integration of bus stops at Nature Park will be critical to provide access for all users.

*This would require further study and integration with existing Larch Clover community Center.

TOPOGRAPHY

The creation of berms would created the framework for a greater variety of habitats. It would enable the establishment of woodland habitat without being influenced by the higher levels of boron expected on the site. Habitat islands could be established to provide sanctuary for certain nesting birds. Berms would also allow earthen paths to lead to overlooks giving a greater view of the nature park and beyond to the Tracy Hills and Diablo Range. Meanwhile, portions of the site where soil has been borrowed to create berms could become wet meadow and open water landscapes. See appendix B for further diagrams and sections regarding topography



PHASING

PHASE NOW

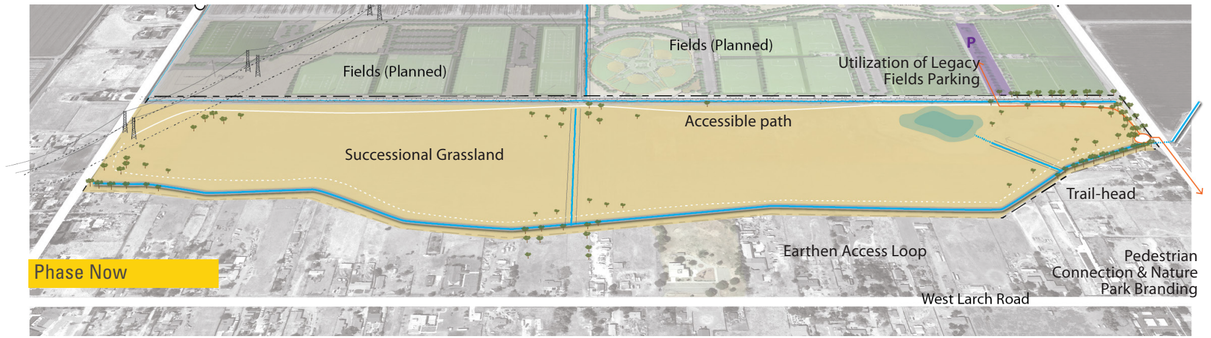
COMMUNITY BUILD – UPON PLAN ADOPTION BY CITY COUNCIL

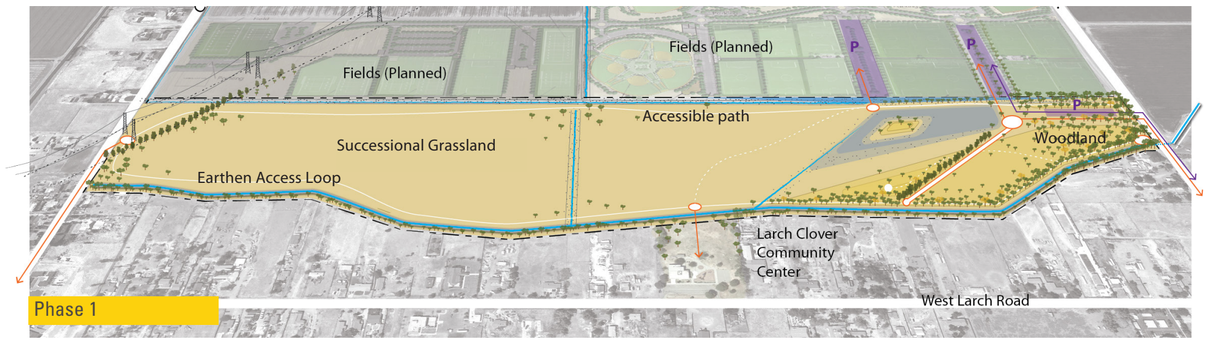
Accessible trailhead connecting to existing crosswalk with temporary shade structure
1 mile accessible path connecting to trailhead & existing Legacy Field's parking
2 mile earthen access loop around perimeter
Discontinue tillage of fields & planting of native/adapted seed mix
Identity signage / Nature Park branding along Tracy Blvd.
Initial tree planting by volunteers
Hydrological & soil analysis
Begin schematic design of phase 1

PHASE 1

INITIAL EARTH MOVING & GRAND OPENING OF NATURE PARK

Earth moving – wet meadow zones, habitat islands, hills, buffers, windbreaks
¼ mile paved accessible trail loop with benches
Dedicated intersection and Nature Park entrance added on Tracy Boulevard
(30-40)dedicated on-site parking on earthen surface with accessible parking
Native restoration & climate appropriate tree planting in woodland areas & buffers
Interpretive sign-age & education
Temporary restroom facility - at accessible trailhead
Trailheads with appropriate shading elements and picnic tables





Dedicated automobile intersection & parking for Nature Park

PHASING

PHASE 2

COMPLETE SITE EARTHWORK

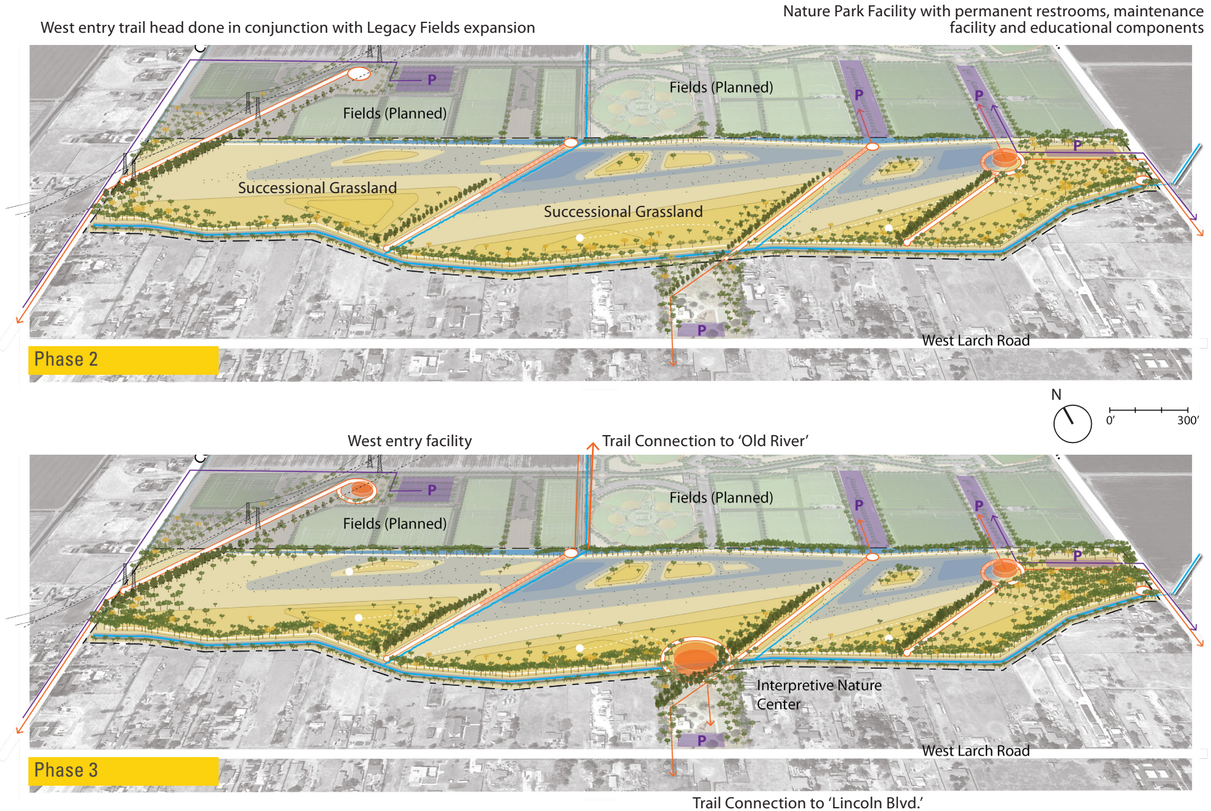
Earth moving – wet meadow zones, habitat islands, hills, buffers, windbreaks
Integration with Larch Clover Community Center
Permanent trail-head facility / restrooms at East entry
West entry added in conjuction with Legacy Fields expansion
Additional accessible trial loops added
Additional on-site parking based on further traffic and use studies

PHASE 3

BASED ON FURTHER FUNDING OPPORTUNITIES

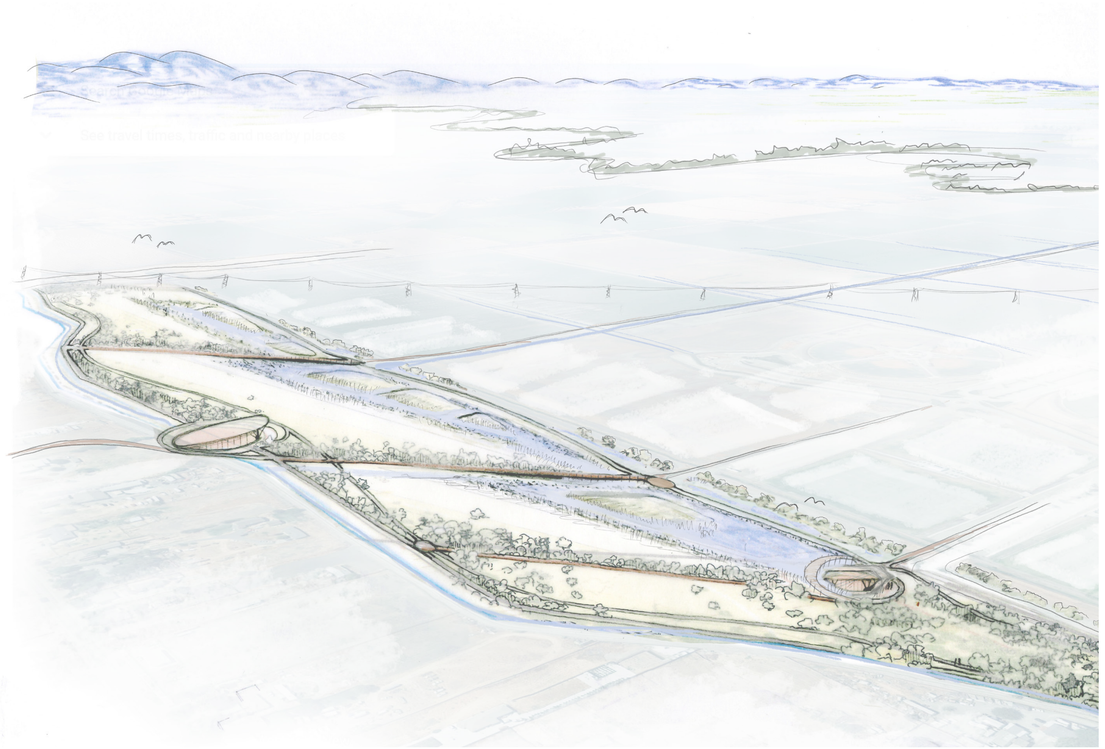
Dedicated drive entry & parking in conjunction with Larch Clover Community Center
Expansion of trail loops & overlooks
Expansion of actively managed native habitat zones
Interpretive Nature Center with ranger lead activities and hands-on-learning
Potential trail connections south to Lincoln Blvd. and north to Old River

*All phases identified in this report are a guideline but park improvements could occur as funds become available without regard to specified phases



THE SEED OF A LEGACY

Similar to its neighbor Legacy Fields, the establishment of Tracy Nature Park is a legacy of its own. Adoption of Tracy Nature Park Master Plan will be the “planting of a seed” for future generations and be a new home for hundreds of species in the greater delta ecosystem.

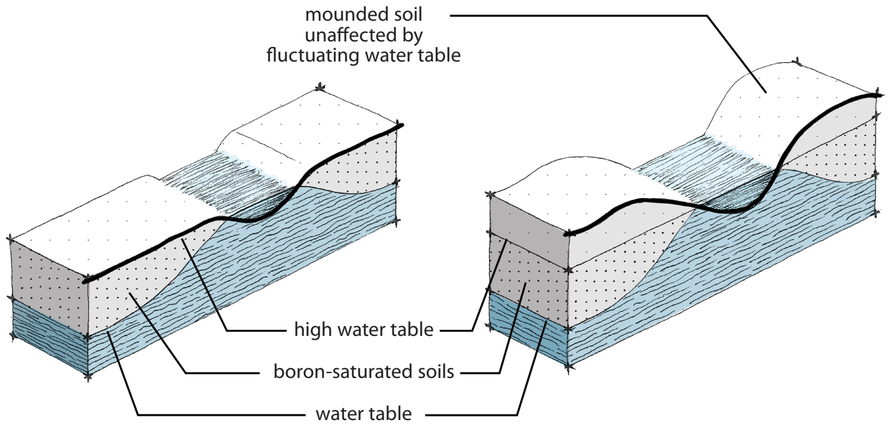


APPENDIX A NEXT STEPS

Upon acceptance by the community and adoption by the City Council several steps can be taken to as suggested below:

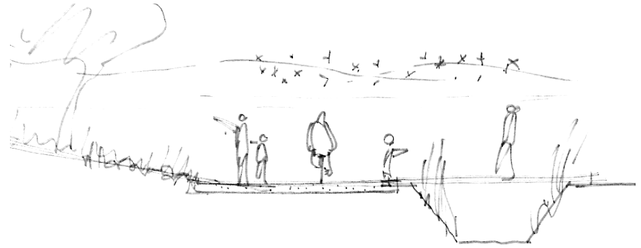
- staff to purse alternate funding. establish partnership with local community group
- begin conversation with Larch Clover community
- habitat mitigation
- establish potential connections and integration with Legacy Fields
- drafting of successsional management plan for phase now
- implementation of phase now
- soil samples & water samples
- hydrological analysis & engineering support of existing conditions and evaluation of master plan
- site easements & implications of design
- site survey including documentation of ruderal species that might provide insight into soil and hydrological conditions of the site
- traffic access study for phase 1 intersection at Tracy Blvd.
- opportunities for pedestrian access and integration with legacy fields
- partnership with Larch Clover community
- phase now planting plan
- community-driven tree planting to occur in locations not effected by future phases of earth moving

APPENDIX B TOPOGRAPHY

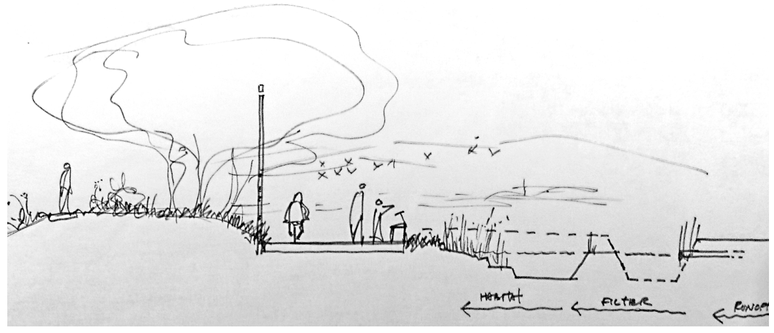


CURRENT SITE SECTION

PROPOSED SITE SECTION



A - SECTION THROUGH IRRIGATION CHANNEL



B - SECTION THROUGH LEGACY FIELDS EDGE

APPENDIX C KICKOFF EVENT SUMMARY

WRT

Tracy Nature Park Master Plan Kickoff | Event Summary

August 28, 2019, 5pm -7pm

Location: Southwest Soccer Field Shade Structure, Legacy Fields

INTRODUCTION

The City of Tracy initiated the Tracy Nature Park master planning process with a community meeting held at Legacy Fields Sports Complex on the evening of August 28, 2019. Approximately 30 people attended for at least part of the program, which consisted of a presentation, a site visit, a group exercise, and the sharing of priorities and visions.

The meeting began with introductions of City Staff, the Consultant team, and stakeholders—many of whom have been active proponents of a nature park in Tracy. Peter Winch (WRT) and Brian MacDonald (City of Tracy) described the project and its background, including the relationship between the nature park and the citywide parks master plan update and why the Legacy Fields site was being considered. John Gibbs (WRT) reflected on the value of natural spaces and the various ways a nature park could be conceived of and created, sharing a range of examples. Several participants mentioned their own precedents: Bernal Community Park in Pleasanton, Audubon Canyon Ranch in the Marin Headlands, Wildcat Canyon Regional Park in Richmond, Woodward Park in Fresno, and Golden Gate Park in San Francisco. There was a discussion on how a nature park at this site, with its relatively flat topography, could be complemented by preserved open space at Tracy Hills, and about making a natural environment work at this location.

The group then took a walk out to the site, observing the irrigation pond and canal; hearing the wind and the sounds of the freeway and birds; and feeling the strong afternoon sun.

Returning to the picnic area, the group split into three smaller discussion groups to complete a series of activities designed to capture what elements people desired in a nature park, how those elements might be distributed on this site, and—perhaps most importantly—what their vision was for a nature park in Tracy. Representatives from each group then summarized these conversations and findings to the larger group. These are described below.

WRT

MEMORANDUM

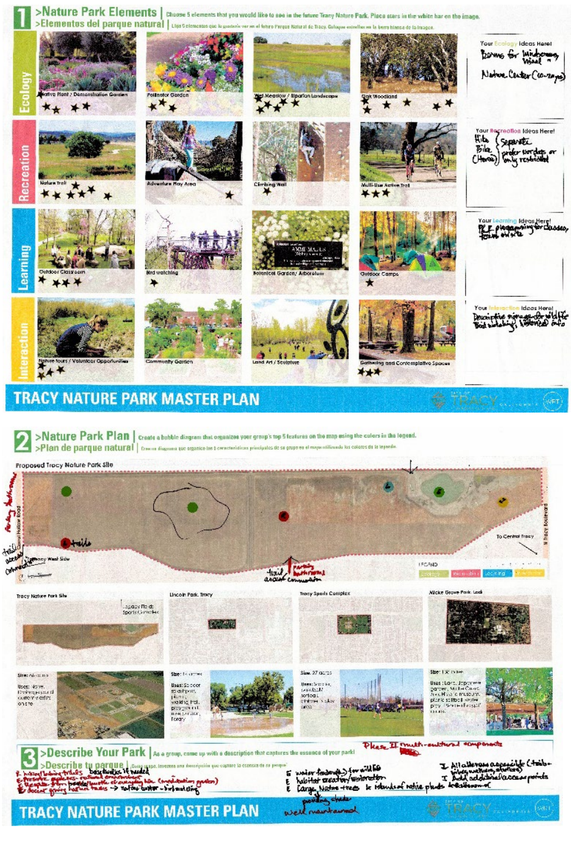
GROUP ACTIVITIES

Group 1

WRT

MEMORANDUM

Group 2



WRT

MEMORANDUM

Group 3

SUMMARY

Group 1: ***Passive, Natural Environment***

Group 1 indicated a strong priority for the creation or restoration of a natural landscape and vegetation on the site, that could include oak woodlands, native plants, and wet meadow / riparian areas. People would be given opportunities to experience the site using a multiuse trail along the perimeter and walking trails in the site's interior. The group also supported the inclusion of restrooms at the site entrance, but was otherwise opposed to more developed visitor elements or active recreation features. Group 1 described their nature park as "passive, natural, draw[ing] on Tracy's ecology, water, trees, and wildlife."

Group 2: ***Restoration, Recreation and Learning***

Group 2 favored an environment featuring oak woodlands, native plants, and wet meadow/ riparian landscape. This group also suggested the inclusion of berms that would shield

WRT

MEMORANDUM

visitors in the park from wind and sun and from the sights and sounds of traffic and recreation. The park would create a sheltered experience within the landscape.

Group 2's nature park would support recreation, learning, and interaction centered on the outdoor environment. The park could create opportunities for hiking, cycling, and horseback riding; classes and tours; and educational signage for wildlife, bird watching, and historical information.

When asked to describe their park, representatives of Group 2 proposed that restoration of a natural environment should be the first phase. After natural qualities were reestablished, recreational use could begin.

Group 3: ***Natural Refuge and Place of Beauty***

Group 3 prioritized trees, which would be the means to create new types of spaces not otherwise found in Tracy. Group 3 envisioned working with the site's winter wet areas and the irrigation pond, creating new waterways across the site and a naturalized pond that supports life. The park could include boardwalks, allowing people to interact intimately with the landscape, and educational signage. Group 3 saw the potential for a natural setting to be a valuable backdrop for events, photos, and art installations. The essence of the park would be a Zen-like refuge, giving people in Tracy a place to interact with nature and solitude in a way that is currently lacking.

CONCLUSION / NEXT STEPS

Nature park stakeholders were enthusiastic about natural elements, especially oak woodlands and wet meadow / riparian landscape. Participants expressed that the park should be low maintenance in order to ensure long term success.

Stakeholders agreed that nature trails were essential to allow people to enjoy the site. The ideas of nature tours and volunteering were received positively. Participants generally felt that Tracy already provides sufficient active recreational programming for children and youth, and did not see a role for that in the nature park. Participants were excited to see progress in realizing a nature park for Tracy.

APPENDIX D
SITE ANALYSIS REPORT

WRT

Tracy Nature Park Site Evaluation | Findings

INTRODUCTION

WRT was hired by the City of Tracy to define a vision for a nature park. Site Evaluation was conducted through site visits to remnant wetland ecosystems along the Old River just 3 miles from the potential Tracy Nature Park site. Additionally, notes and observations were made from walking the site and documenting adjacencies such as Legacy Fields to the north, Larch Clover to the south, and flooded agricultural fields to the northwest. LSA provided initial ecological analysis through dialogue with WRT. Research was conducted on the evolution of the landscape from the early 1800's delta ecosystem to its present-day condition of channelized canals and agricultural fields.

EVOLUTION OF AN ECOSYSTEM

Prior to the channelization of the delta for agricultural purposes, the site of the potential Tracy Nature Park was adjacent to several ecosystems including grasslands, tidal freshwater wetland, non-tidal freshwater wetland and seasonal wetland. This is also reflected in the fact that the average elevation of the site is just 3' above sea level.

Habitat complexity of the South Delta. by artists and naturalist Laura Cunningham

ADJACENT ECOLOGIES

Just 3 miles from the future site of Tracy Nature Park, just north of where Tracy Boulevard crosses the Old River, is Sam's Market. Behind Sam's Market is an informal fishing hole

MEMORANDUM

which provides a lush riparian environment publicly accessible. While only 3 miles from the site of Tracy Nature Park, the lack of a dedicated bike lane, or walking trail makes a bike ride or hike hostile next to the fast-moving traffic. A separated multi-use hiking/biking path would make for a nice future connection to Tracy Nature Park and a citywide network of parks and trails.

Photo of native Oak stand on an island of the Old River just a few miles from Tracy Nature Park. Photo by WRT

Fishing hole on the Old River Photo by WRT

Tule, willow, lady fern, dogwood, bur reed and Sagittaria

MEMORANDUM

At the north-west edge of the site a flooded agricultural field provides habitat for several species of birds. Photo by WRT

NATURE PARK TODAY

While the site of the potential Tracy Nature Park can feel barren today, a walk around the open field reveals that life is present.

A panorama of the site from North Tracy Bouvard Photo by WRT

Current tenants of Nature Park emerged from the agricultural ditches on the periphery of the site. A white heron was seen amongst a flock of birds in the flooded agricultural field just to the north-west of the site. In the distance a hum of noise could be heard from the site as it appeared hundreds of birds were feeding in the adjacent field. It should be noted that though adjacent sites are agricultural in nature does not exclude them from providing habitat for an array of species.

A river otter was encountered in commute between 2 ditches in the center of the Nature Park. As he seen humans approaching, he quickly turned back to his original ditch and swam quickly away. In addition to the river otter, and heron several birds were observed in the area including:

Canada goose (Branta canadensis)

WRT

MEMORANDUM

green heron (Butorides virescens)

American coot (Fulica americana)

killdeer (Charadrius vociferus)

American crow (Corvus brachyrhynchos)

Eurasian collared dove (Streptopelia decaocto)

northern mockingbird (Mimus polyglottos)

house finch (Haemorhous mexicanus)

lesser goldfinch (Spinus psaltria)

Hank the Heron – Photo by WRT

Rosie the River Otter – Photo by WRT

In addition to Hank and Rosie, Nature Park might provide home to several other residents. LSA Environmental Consultants thought the following species might have a chance to one day call Nature Park Home:

Swanson's Hawk - Buteo swainsoni

Burrowing Owl - Athene cunicularia

Mallard - Anas platyrhynchos

Snowy Egret - Egretta thula

WRT

MEMORANDUM

Pacific tree frog - Hyliola regilla

River Otter – Lontra canadensis

Great egret – Ardea alba

Burrowing Owl - Athene cunicularia

Northern Pacific Treefrog - Hyliola regilla

While the site of Tracy Nature Park provides an opportunity to be home to a range of species, the human/nature interface will be important to ensure species do not feel threatened to the proximity of humans. LSA Environmental Consultants suggested buffer distances ranging from 50'-300' depending on the species. As the site is 5,000'x800' there should be ample space to provide both walking paths and several habitat zones within the site. A question for the community will be determining a balance between space for humans and space for habitat.

RESPONSE TO TRACY NATURE PARK PROJECT KICKOFF August 28, 2019

Group 1: ***Passive, Natural Environment***

Group 1 indicated a strong priority for the creation or restoration of a natural landscape and vegetation on the site, that could include oak woodlands, native plants, and wet meadow / riparian areas. People would be given opportunities to experience the site using a multiuse trail along the perimeter and walking trails in the site's interior. The group also supported the inclusion of restrooms at the site entrance but was otherwise opposed

WRT

MEMORANDUM

to more developed visitor elements or active recreation features. Group 1 described their nature park as "passive, natural, draw[ing] on Tracy's ecology, water, trees, and wildlife."

Response: Having zones of more developed program at the entrance would leave much of the remaining park open to habitat. An important question to be answered will be the exact number and locations of entrances to the park. Through analysis, it was envisioned the park might want to provide a primary entrance along North Tracy Boulevard, with additional access at Legacy Fields, Clover Larch Community Center, and Corral Hollow Road.

Group 2: ***Restoration, Recreation and Learning***

Group 2 favored an environment featuring oak woodlands, native plants, and wet meadow/ riparian landscape. This group also suggested the inclusion of berms that would shield visitors in the park from wind and sun and from the sights and sounds of traffic and recreation. The park would create a sheltered experience within the landscape.

Group 2's nature park would support recreation, learning, and interaction centered on the outdoor environment. The park could create opportunities for hiking, cycling, and horseback riding; classes and tours; and educational signage for wildlife, bird watching, and historical information.

When asked to describe their park, representatives of Group 2 proposed that restoration of a natural environment should be the first phase. After natural qualities were re-established, recreational use could begin.

Response: The site visit confirmed the quality of the open expanse of the site. Sounds far in the distance could be heard such as barking dogs, traffic, and birds. While the expansive of the site can be amenity for views, it will be important to provide areas of quiet and calm refuge. It was noticed that sitting just a few feet lower in the fields was a feeling of enclosure and protection from the wind and sound. The utilization of berms and subtle topography changes would provide for zones of refuge contributing to a greater variety of environments for the site.

If a more active path is to be defined on the site, it will be important to position it in a way that provides buffer for important habitat zones as defined above. While education was important to group two the edge of these buffer zones might want to provide vistas where the habitat could be observed from a distance.

A phased approach will be important to the success of the Nature Park. While ecosystems require time to move through various states of succession, human activities might evolve in parallel with the ecosystem to ensure they are not detrimental to the success of the Nature Park.

WRT

MEMORANDUM

Group 3: ***Natural Refuge and Place of Beauty***

Group 3 prioritized trees, which would be the means to create new types of spaces not otherwise found in Tracy. Group 3 envisioned working with the site's winter wet areas and the irrigation pond, creating new waterways across the site and a naturalized pond that supports life. The park could include boardwalks, allowing people to interact intimately with the landscape, and educational signage. Group 3 saw the potential for a natural setting to be a valuable backdrop for events, photos, and art installations. The essence of the park would be a Zen-like refuge, giving people in Tracy a place to interact with nature and solitude in a way that is currently lacking.

Response: While a broad range of trees are possible for the site much of the native oak stands along the Old River would take decades to reach maturity. Other tree species such as willows, cottonwood, elderberry, and eucalyptus would be faster growing, providing enclosure and habitat in a shorter amount of time. While native plants might want to be prioritized for the Nature Park Site, certain exotics might be more appropriate if they are faster growing, provide habitat, require less maintenance and do not pose risk of being invasive or fire prone.

The existing irrigation pond provides an opportunity for habitat and a meditative experience. The exact function and anticipated future of the irrigation pond should be studied in order to understand if it can become a permanent fixture of the Nature Park, and to what degree of adaptability might allow it to evolve.

CONCLUSION / NEXT STEPS

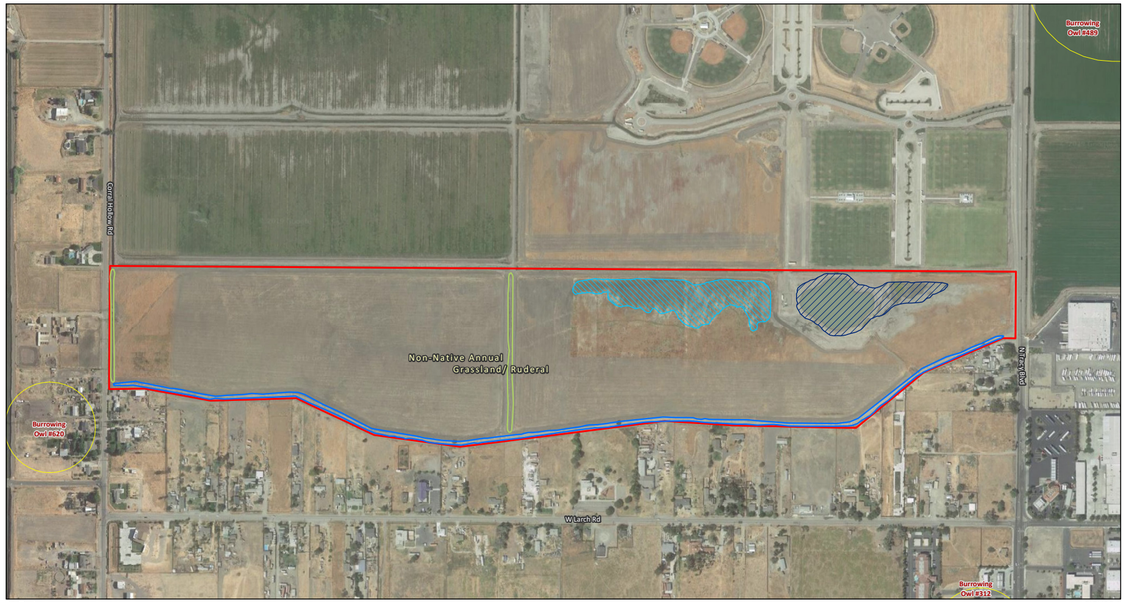
Site analysis provided promising results as the presence of life was found to exist around all edges of the site. The native riparian habitat along the Old River provides a sample of what might one day be able to exist in the Nature Park. Challenges were identified such as the exposure to wind, sounds, and light pollution (from adjacent Legacy Fields). Uncertainties such as the hydrology of the site will need to be better understood in order to better predict the success of certain habitats. This might require the consultation of a hydrologist. Additionally, access to Nature Park will be a challenge given its location on the periphery of town. This will continue to be studied as it relates to the future of the Tracy Parks Master Plan. Potential future connections with the extension of Lincoln Blvd will be considered as well as mapping potential future multiuse routes to the Old River. Tracy Nature Park has potential to evolve into a rich natural environment unique to the cultural ecology of the south delta, and provide a place of refuge for animals and humans alike.

WRT

MEMORANDUM

Site Analysis Diagram of Tracy Nature Park - WRT

APPENDIX E EXISTING CONDITIONS SURVEY



LSA

LEGEND

- Tracy Nature Park
- CNDDB Occurrences
- Concrete-lined Drainage Channel
- Drainage Channel
- Reservoir
- Approximate location of Potentially Jurisdictional Seasonal Wetland (based on aerial imagery)

0 200 400
FEET

SOURCE: Google Maps Sat (07/2019); CDFW CNDDB (07/2019).
I:\WRT1902\GIS\Maps\Bio Report\Figure 1_Existing Conditions.mxd (9/13/2019)

FIGURE 1

Tracy Nature Park
Tracy, San Joaquin County, California
Existing Conditions

APPENDIX F SPECIAL STATUS SPECIES LIST

Table A: Special-Status Species Potentially Occurring in the Vicinity of the Project Site

Species	Common Name	Status*	Ecological and Biogeographical Information	Probability to Occur within Project Site
Plants				
Blepharizonia plumosa	Big tarplant	1B.1	Occurs in annual grassland on clay to clay-loam soils, usually on slopes and often in burned areas, and below 1,500 feet.	No suitable habitat present due to prior disturbance at the site, such as alfalfa production and regular discing. Not likely to occur.
Tropidocarpum capparideum	Caper-fruited tropidocarpum	1B.1	Occurs in low, alkaline grasslands of hillsides or valleys.	No suitable habitat present. Not likely to occur.
Cirsium crassicaule	Slough thistle	1B.1	Occurs in shallow water in sloughs and canals.	No suitable habitat present. Not likely to occur.
Lilaeopsis masonii	Mason's lilaeopsis	SR, 1B.1	Occurs in freshwater and brackish marshes, riparian scrub; in tidal zones, in muddy or silty soil formed through river deposition or riverbank erosion. 0-10 meters.	Although unlikely due to regular maintenance of the ditches, could occur in irrigation ditches within the project site.
Symphyotrichum lentum	Suisun Marsh aster	1B.2	Occurs in marshes and swamps (brackish and freshwater), mostly along sloughs. 0-3 meters.	Although unlikely due to regular maintenance of the ditches, could occur in irrigation ditches within the project site.
Eryngium racemosum	Delta button celery	SE, 1B.1	Riparian scrub. Seasonally inundated floodplain on clay. 3-75 meters.	Although unlikely due to regular maintenance of the ditches, could occur in irrigation ditches within the project site.
Fish				
Oncorhynchus mykiss irideus	Steelhead - Central Valley Distinct Population Segment	FT	Occurs in waters of San Joaquin River.	No suitable habitat present. No potential to occur.
Spirinchus thaleichthys	Longfin smelt	FC, ST	Occurs in waters of San Joaquin River.	No suitable habitat present. No potential to occur.
Invertebrates				
Branchinecta lynchi	Vernal pool fairy shrimp	FT	Endemic to the eastern margin of the Central coast mountains in seasonal astatic grassland vernal pools; inhabit small, clear-water depressions in sandstone and clear-to-turbid clay/grass-bottomed pools in shallow swales.	No suitable habitat present. No potential to occur.
Branchinecta longiantenna	Longhorn fairy shrimp	FE	Endemic to the eastern margin of the Central coast mountains in seasonal astatic grassland vernal pools; inhabit small, clear-water depressions in sandstone and clear-to-turbid clay/grass-bottomed pools in shallow swales.	No suitable habitat present. No potential to occur.
Desmocerus californicus dimorphus	Valley elderberry longhorn beetle	FT	Occurs only in the Central Valley of California, in association with blue elderberry (Sambucus nigra ssp. caerulea). Preferable to branches greater than 1 inch in diameter.	No suitable habitat present. No potential to occur.
Amphibians				
Spea hammondii	Western spadefoot	SSC	Occurs primarily in grassland habitats but also found in valley-foothill hardwood woodlands. Ephemeral drainages or seasonal wetlands are essential for breeding and egg-laying.	No suitable habitat present. No potential to occur.
Rana draytonii	California red-legged frog	FT, SSC	Ponds, streams, drainages and associated uplands; requires areas of deep, still, and/or slow-moving water for breeding.	No suitable habitat present. No potential to occur.
Rana boylii	Foothill yellow-legged frog	ST, SSC	Partly shaded, shallow streams and riffles with a rocky substrate.	No suitable habitat present. No potential to occur.
Ambystoma californiense	California tiger salamander	FT, ST	Grasslands and foothills that contain small mammal burrows (for dry-season retreats) and seasonal ponds and pools (for breeding during the rainy season).	No suitable breeding habitat present on or near the project site. No potential to occur.
Reptiles				
Emys marmorata	Western pond turtle	SSC	Occurs in permanent or nearly permanent water sources, ponds, marshes, rivers, streams and irrigation ditches with emergent vegetation and basking sites.	Could occur in the constructed reservoir and briefly along the irrigation ditches when water is present.
Masticophis flagellum ruddocki	San Joaquin coachwhip	SSC	Typically occurs in grassland and scrub habitats in the Central Valley.	No suitable habitat present.
Arizona elegans occidentalis	California glossy snake	SSC	Typically occurs in desert habitats, but also in chaparral, sagebrush, valley-foothill hardwood, pine-juniper, and annual grasslands.	No suitable habitat present.
Phrynosoma blainvillii	Blainville's horned lizard	SSC	Typically occurs in sandy and gravelly soil substrates of grassland and scrub habitats.	No suitable habitat present.
Anniella pulchra	Northern California legless lizard	SSC	Occur in loose, sandy soils or leaf litter, typically in sand dunes.	No suitable habitat present.
Birds				
Athene cunicularia	Burrowing owl	SSC	Occurs in open, dry annual grasslands, deserts and scrublands. Requires suitable burrows for nesting.	Suitable nesting, wintering, and foraging habitat present within the on-site irrigation ditches. Nine burrowing owls observed by the De Novo Group in February 2009. No burrowing owls or owl sign observed during LSA's 2019 site visit.

Species	Common Name	Status*	Ecological and Biogeographical Information	Probability to Occur within Project Site
Asio flammeus	Short-eared owl	SSC	Occurs in open grasslands, meadows, marshes, and irrigated alfalfa fields with few trees. Requires dense ground vegetation for both roosting and nesting.	No suitable nesting habitat present. Could forage at the site.
Buteo swainsoni	Swainson's hawk	ST	Forages in open grasslands and agricultural fields. Nests in large trees such as valley oak, cottonwood, or eucalyptus.	Suitable foraging habitat present and could nest in large trees on and adjacent to the site. Several known nests have been recorded in the vicinity (CDFW 2020). De Nov Group observed species flying over project site in February 2009.
Circus hudsonius	Northern harrier	SSC	Nests in wet meadows and marshes, forages over open grasslands and agricultural fields.	No suitable habitat present. Could forage at the site.
Lanius ludovicianus	Loggerhead shrike	SSC	Open grasslands, agricultural areas, and woodlands with scattered shrubs, fence posts, utility lines, or other perches. Builds nests in densely-foliated shrubs or trees. Forages in open grasslands and often skewers prey on thorn, twig, or barbed wire.	Could forage at the site or nest in adjacent trees and shrubs.
Elanus leucurus	White-tailed kite	CFP	Nests in tall shrubs and small tress of grasslands and savannas.	Could forage at the site or nest in adjacent trees and shrubs. De Novo Group observed species flying over project site in 2009.
Melospiza melodia	Song sparrow ("Modesto" population)	SSC	Prefers moderately dense vegetation to supply cover for nest sites, a source of standing or running water, semi-open canopies to allow light, and exposed ground or leaf litter for foraging.	No suitable nesting habitat present on project site. Unlikely to occur.
Agelaius tricolor	Tricolored blackbird	SE, SSC	Nests in freshwater marshes with tules or cattails, or in other dense vegetation such as thistle, blackberry thickets, etc. in close proximity to open water. Forages in a variety of habitats including pastures, agricultural fields, rice fields, and feedlots.	No suitable nesting habitat present on project site. Could forage at the project site.
Xanthocephalus xanthocephalus	Yellow-headed blackbird	SSC	Nesting colony located in dense emergent wetland of cattails, tule, often along border of lake or pond. Breeds only where large insects such as Odonata are abundant; large wetlands preferred	No suitable nesting habitat present on project site.
Mammals				
Antrozous pallidus	Pallid bat	SSC	Roost under bridges, in large culverts, in buildings and in tree hollows. Forages over a variety of habitat types.	No suitable roosting habitat present. Could forage over site.
Eumops perotis californicus	Western mastiff bat	SSC	Roosts in crevices in cliff faces, tunnels, and high buildings.	No suitable roosting habitat present. Could forage over site.
Corynorhinus townsendii	Townsend's big-eared bat	SSC	Found in wooded areas with caves or old buildings for roost sites.	No suitable roosting habitat present. Could forage over site.
Sylvilagus bachmani riparius	Riparian brush rabbit	FE, SE	Prefers dense brush and nearby openings associated with the banks of the Stanislaus River and San Joaquin River.	No suitable habitat present on project site. Not likely to occur on project site.
Taxidea taxus	American badger	SSC	Builds dens and burrows in open grassland areas or at the edge of cropland.	Could pass through the site, but not likely to burrow at the site due to the site's urban setting and lack of abundant prey.
Vulpes macrotis mutica	San Joaquin kit fox	FE, ST	Annual grasslands or grassy open stages with scattered shrubby vegetation. Needs loose-textured sandy soils for burrowing and a suitable prey base.	Could pass through the site, but not likely to burrow at the site due to the site's urban setting and lack of abundant prey.

Status:

FE =Federally Endangered
FC = Federal Candidate Listed Species
ST = State Threatened
CE = Candidate State Endangered
SSC = California Species of Special Concern
FT = Federally Threatened
SE = State Endangered
SR = State Rare
CFP = California Fully Protected
1B = CRPR (California Rare Plant Rank): plant considered rare, threatened, or endangered in California and elsewhere.

CRPR Threat Extensions:
0.1 = Seriously threatened in California (over 80 percent of occurrences threatened/high degree and immediacy of threat)
0.2 = Moderately threatened in California (20-80 percent of occurrences threatened/ moderate degree and immediacy of threat)

APPENDIX G CALIFORNIA ENVIRONMENTAL QUALITY ACT ADDENDUM

CARLSBAD
FRESNO
IRVINE
LOS ANGELES
PALM SPRINGS
POINT RICHMOND
RIVERSIDE
ROSEVILLE
SAN LUIS OBISPO

MEMORANDUM

DATE: November 17, 2020

TO: Peter Winch, WRT

FROM: Theresa Wallace, AICP, Principal
Shanna Guiler, AICP, Associate/Environmental Planner

SUBJECT: California Environmental Quality Act Addendum and Initial Study Checklist for the Tracy Nature Park Project, Tracy, California

This document, prepared pursuant to the California Environmental Quality Act (CEQA) and the regulations and policies of the City of Tracy, provides information and analysis concerning the Tracy Nature Park Project (proposed project). This document is an Addendum to the Holly Sugar Sports Park Project Final Environmental Impact Report[1] (2010 EIR), which was certified by the City of Tracy in June 2010. This Addendum to the 2010 EIR evaluates whether changes associated with the proposed project would result in new or substantially more adverse significant effects or require new mitigation measures not identified in the 2010 EIR. See Attachment A for a full description of the proposed project. An Initial Study Checklist, provided as Attachment B, supports the environmental findings documented in this memorandum. The City of Tracy is the Lead Agency under CEQA. In accordance with CEQA Section 21093(b) and CEQA Guidelines Section 15152(a), this Addendum tiers off the 2010 EIR, adopted in June 2010, which is hereby incorporated by reference.

INTRODUCTION

The project site consists of 86 acres of currently vacant land (Assessor's Parcel Number [APN]: 212-15-001) in the northern portion of the City of Tracy. The project site is part of the larger Holly Sugar Sports Park facility (now Legacy Fields Sports Complex), located between Tracy Boulevard and Corral Hollow Road north of Larch Road, and south of Sugar Road. Lands to the west and east of the project site are agricultural lands with a few scattered residences. Land to the south of the project site is developed with rural residential uses associated with the Larch Clover community.

The proposed project would result in the development of the Tracy Nature Park, consisting of habitat creation/restoration, walking and biking trails, bridges and structures trails, parking area, and an interpretive Nature Center. As described in the 2010 EIR, this area was proposed as a "Passive Recreation Area" to serve as a buffer between the more developed active parks uses associated with the Legacy Fields Sports Complex and the rural residences to the south. Proposed passive recreational activities would include, but not limited to walking and biking trails, bocce ball, disc golf, or an arboretum.

[1] De Novo Planning Group. 2010. *Final Environmental Impact Report for the Holly Sugar Sports Park Project, SCH# 2008122103*. June.

This Addendum is prepared pursuant to CEQA Guidelines Section 15164 which states: "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." Section 15162 specifies that "no subsequent EIR shall be prepared for that project unless the lead agency determines … one or more of the following:"

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR 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 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 was adopted, shows any of the following:

   (A) The project will have one or more significant effects not discussed in the previous EIR;

   (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

   (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.

Pursuant to CEQA Guidelines Section 15164(e), the purpose of this Addendum is to describe and evaluate the proposed project (development of the Tracy Nature Park as described in the Tracy Nature Park Master Plan[2]), assess the proposed modifications to the project evaluated in the 2010 EIR, and identify the reasons for the City's conclusion that changes to the proposed project and associated environmental effects do not meet the conditions described in CEQA Guidelines Section 15162 calling for preparation of a subsequent or supplemental EIR.

[2] WRT, 2020. *Tracy Nature Park Master Plan*. February.

Attachment A to this Addendum provides a complete description of the proposed project, its location, existing site characteristics, proposed development, and required approvals and entitlements.

Attachment B to this Addendum provides the Environmental Checklist prepared for the project. This checklist provides information to: (1) compare the environmental impacts of the proposed project with impacts expected to result from implementation of the project evaluated in the 2010 EIR; (2) demonstrate that the proposed project would not result in new or more severe significant environmental impacts; (3) provide new or revised mitigation measures not identified in the 2010 EIR, and (4) conclude that no substantial changes with respect to the circumstances under which the project would be undertaken since the 2010 EIR was certified resulted in new or more severe significant environmental effects.

COMPARISON TO THE CONDITIONS LISTED IN CEQA GUIDELINES SECTIONS 15162 AND 15163

The following discussion summarizes the reasons that a subsequent or supplemental EIR, pursuant to CEQA Guidelines Sections 15162 and 15163, is not required and an Addendum to the 2010 EIR is the appropriate CEQA document.

Substantial Changes

Per the analysis included in Attachment B, Environmental Checklist, the proposed modifications to the project evaluated in the 2010 EIR would not result in new significant impacts beyond those identified in the 2010 EIR, would not substantially increase the severity of impacts identified in the 2010 EIR, and would not require major revisions to the 2010 EIR. Therefore, the proposed changes to the project would be minor modifications, not substantial changes, and an Addendum is the appropriate document to address these minor modifications rather than a subsequent or supplemental EIR.

Substantial Changes in Circumstances

As described in the Environmental Checklist for each topic, environmental conditions in and around the project site have not changed such that implementation of the proposed minor modifications to the 2010 EIR would result in new significant environmental effects or a substantial increase in the severity of environmental effects identified in the 2010 EIR, and thus would not require major revisions to the 2010 EIR.

New Information

No new information of substantial importance, which was not known or could not have been known when the 2010 EIR was adopted, has been identified which shows that the proposed minor modifications to the 2010 EIR associated with the proposed project would be expected to result in: (1) new significant environmental effects not identified in the 2010 EIR; (2) substantially more severe environmental effects than shown in the 2010 EIR; (3) mitigation measures or alternatives previously determined to be infeasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the City declines to adopt the mitigation measure or alternative;

or (4) mitigation measures or alternatives which are considerably different from those analyzed in the 2010 EIR would substantially reduce one or more significant effects on the environment, but the City declines to adopt the mitigation measure or alternative. In addition, the proposed minor modifications would require no new mitigation measures, as described throughout the Environmental Checklist, because no new or substantially more severe impacts are expected beyond those identified in the 2010 EIR.

CONCLUSION

The proposed minor modifications to the 2010 EIR described in this Addendum would not require major revisions to the 2010 EIR due to new or substantially increased significant environmental effects. The analysis contained in the Environmental Checklist confirms that the revised project is within the scope of the 2010 EIR and will have no new or more severe significant effects and no new mitigation measures are required. Therefore, no subsequent or supplemental EIR or further CEQA review is required prior to approval of the revised project, as described in this Addendum.

Attachments: A: Project Description
B: Environmental Checklist Pursuant to CEQA Guidelines Section 15168

ATTACHMENT A
PROJECT DESCRIPTION

The following describes the proposed Tracy Nature Park Project in the City of Tracy. The project would include development of a nature park on 86 acres of currently undeveloped land just south of the Legacy Fields Sports Complex. This project description is part of the preparation of an Addendum to the Holly Sugar Sports Park Project Final Environmental Impact Report[1] (2010 EIR), which was certified by the City of Tracy in June 2010. The City is the CEQA lead agency for the proposed project.

1.0 BACKGROUND

A group within the greater Tracy community banded together with an aspiration to establish a "Nature Park" within the City. The City Council responded to their request by designating 86 acres on the north boundary of the City to be transformed from agricultural fields to a nature refuge for the community. These 86 acres were part of the larger Holly Sugar Sports Park (now called Legacy Fields Sports Complex), which was formally evaluated in the 2010 EIR. As described in the 2010 EIR, the project site was intended as a Passive Recreation Area to buffer the active sports fields to the north from residential development to the south (hereinafter referred to as the "2010 Project"). The 2010 EIR was prepared pursuant to the California Environmental Quality Act (CEQA) and certified by the City of Tracy.

As part of the most recent City of Tracy Parks Master Plan update, the City hired WRT to define a vision for the park through community engagement and research, resulting in the Tracy Nature Park Master Plan. The Master Plan provides a foundation for future development of the Tracy Nature Park Project. As described in detail below, the Nature Park (hereinafter referred to as the "Proposed Project") would include the following improvements: earthen hiking and biking trails, bridges and structural (elevated) walkways, parking area, trailheads, and an interpretive center, as well as, tree planting and habitat creation/restoration.

Refinements to the park design constitute modifications to the 2010 Project that were not evaluated in the 2010 EIR, which necessitates subsequent environmental review/documentation under CEQA. Section 15164(b) of the CEQA Guidelines states that an Addendum to a certified EIR may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 apply.

The City of Tracy is the Lead Agency under CEQA and has prepared this Addendum to address the potential environmental impacts of implementing the Proposed Project on the project site.

[1] De Novo Planning Group. 2010. *Final Environmental Impact Report for the Holly Sugar Sports Park Project, SCH# 2008122103*. June.

1.1 PROJECT SITE

The following section describes the project location, existing conditions, surrounding land uses, and the regulatory setting.

1.1.1 Project Location

The City of Tracy is located near the southwestern corner of San Joaquin County, which is situated in the Central Valley of California, east of the California Coastal Range and west of the Sierra Nevada. The City of Stockton is northeast of the City and Modesto is due east. The City is surrounded by agricultural land.

The project site consists of 86 acres of undeveloped land located just south of the existing Legacy Fields Sports Complex. The site is located between Tracy Boulevard and Corral Hollow Road north of Larch Road and south of Sugar Road (see Figures 1 and 2).

1.1.2 Existing Conditions

Prior to acquisition by the City, the project site was farmed with alfalfa. The project site is currently undeveloped and the City has been periodically disking/mowing the site. An existing drainage ditch runs along the northern boundary of the project site and another ditch bisects the site. A concrete-lined irrigation canal runs along the southern boundary. A large irrigation pond in the northeastern portion of the project site is currently used to supply water for the adjacent Legacy Fields Sports Complex. The northwestern corner of the project site is traversed by PG&E power transmission lines with towers, and a 12-inch diameter underground PG&E gas pipeline. The project site is essentially flat, and is void of native vegetation, landscaping, and trees. There are no homes or buildings located on the project site. Figure 3 shows the existing conditions on the project site.

1.1.3 Surrounding Land Uses

The project site is located just south of the existing Legacy Fields Sports Complex, and other lands owned by the City for the future expansion of Legacy Fields. Lands to the west and east of the project site consist of agricultural lands with a few scattered residences. The project site is bound to the south by rural residential uses associated with the Larch Clover community.

1.1.4 Regulatory Framework

The City's General Plan Land Use Map designates the project site as Park (P). The site is also zoned for Park. This designation provides for current and future locations for public parks of all sizes in the City. Examples of specific land uses that are appropriate within this designation include active playing fields, parks and recreation facilities, urban parks and plazas, bicycle and walking trails, fountains, landscaped areas and corridors, natural open space and wildlife areas, water recharge and detention facilities (that are also used as public parks when they are not flooded) and renewable energy and/or alternative energy uses.

1.3 2010 PROJECT

The 2010 EIR designated the project site as a "Passive Recreation Area," which would serve as a buffer between the more developed active park uses and the rural residences to the south of the

park site. According to the 2010 EIR, this area may be used for passive recreational activities including, but not limited to, walking and biking trails, bocce ball, disc golf, or an arboretum. No structures or athletic fields are proposed for this area. No parking was proposed for this area, nor was non-emergency vehicular access proposed.

1.4 PROPOSED PROJECT

Since certification of the 2010 EIR, the City has refined the design for the proposed Nature Park project based on community input and background research. As defined in the Tracy Nature Park Master Plan,[2] the Proposed Project would include creation/restoration of native habitat and installation of passive recreation improvements over a period of years, dependent upon available funding. The intent is to establish the foundation for a "succession-based design" in which habitats will establish as site conditions evolve to become suitable.

1.4.1 Proposed Park Features

The City, with community support, proposes to implement the Tracy Nature Park vision, as outlined in the Tracy Nature Park Master Plan. This vision includes earthmoving, vegetation/tree planting, and construction of passive recreation elements to provide public access, while protecting native habitat. Specific park components are described in more detail below.

- **Vegetation.** Windrows would be planted along structured trails traversing the site to provide protection from westerly winds. A planted woodland ecosystem would be established along the east entry near Tracy Boulevard. Buffer plantings would be established at the northern and southern boundaries to filter out light and sound pollution from Legacy Fields to the north and screen views to/from residential uses to the south.

- **Topography.** Cut and fill soil movement would be used to modify the site topography, creating berms, which would create a framework for the establishment of a variety of habitats. Berming would also allow for the establishment of woodland habitat, by mitigating the potential effects of high boron levels expected on the site. Habitat islands could be created to provide sanctuary for nesting birds. Berms would also allow earthen paths to lead to overlooks providing views of the nature park and beyond.

- **Drainage.** The existing drainage ditches and irrigation canals would remain. The large irrigation pond would also remain as a source of water for the Legacy Fields Sports Complex, but may be modified and integrated into the park to provide greater ecological value. Changes to the site topography would create low-elevation, wet meadow areas that would experience seasonal inundation. Filtration swales would be established along the northern site boundary to treat runoff from Legacy Fields prior to entering ecological areas within the site. An additional irrigation pond may be established in the northern portion of the project site to provide back-up irrigation for Legacy Fields. New drainages would provide connections between the existing ditches/irrigation canals.

[2] WRT. 2020. *Tracy Nature Park Master Plan.* February.

- **Trails.** A peripheral, accessible, multi-use trail would be established around the perimeter of the site to provide recreation opportunities for more active users, such as bicyclists. Internal trails would be limited to passive uses only. Bridges and structured trails would diagonally traverse the site with elevated bridges providing views of wet meadows, but not impacting sensitive habitat. Trails would connect offsite to the future expansion of Lincoln Boulevard to the south and north to the "Old River."

- **Access/Parking.** During Phases 0-2, primary access would occur along Tracy Boulevard. An accessible trailhead with shade structure would be constructed near the existing crosswalk. As part of Phase 1, a dedicated intersection and park entrance would be added on Tracy Boulevard with a trailhead, restroom facilities, maintenance facility, educational space, and observation deck. A parking area for approximately 30-40 cars[3] would also be provided in this area. With establishment of the Interpretive Nature Center near the southern boundary of the site during Phase 3, the primary entrance may shift to West Larch Road. Additionally, a west entry may be introduced concurrent with the expansion of Legacy Fields to the west.

- **Interpretive Nature Center**. An approximately 60,000-square foot interpretive nature center would be constructed near the southern boundary of the site. The center may be integrated with the Larch Clover Community Center and would have direct connection to West Larch Road. Alternatively, the interpretive nature center could be located at the east entry.

1.4.2 Phasing

The Proposed Project would be implemented in four phases as described below.

Phase 0 – Community Build (Upon Adoption by City Council). This phase would involve the following improvements:

- Accessible trailhead connecting to the existing crosswalk on Tracy Boulevard
- One-mile accessible path connecting to the proposed trailhead and existing Legacy Fields parking area
- Two-mile earthen access loop around perimeter of the site
- Planting of native/non-native seed mix
- Installation of identity signage/Nature Park branding along Tracy Boulevard
- Initial tree planting by the community
- Hydrological and soil analyses

Phase 1 – Initial Earth Moving and Grading Opening. This phase would involve the following improvements:

- Earth-moving to create wet meadow zones, habitat islands, hills, buffers, and windbreaks

[3] The exact parking quantity and phasing would be determined based on further study.

- ¼-mile, paved, accessible trail loop
- Dedicated intersection and Nature Park entrance added on Tracy Boulevard
- Dedicated on-site park area on earthen surface, with accessible parking (30-40 spaces)
- Restoration and climate-appropriate tree planting in woodland areas and buffers
- Interpretive signage and education
- Temporary restroom facility at accessible trailhead
- Shade structures at trailhead and overlook

Phase 2 – Complete Site Earthwork. This phase would involve the following improvements:

- Earth-moving to create wet meadow zones, habitat islands, hills, buffers, and windbreaks
- Integration with Larch Clover Community Center
- Permanent trailhead facility/restrooms at east entry
- West entry added in conjunction with Legacy Fields expansion
- Additional accessible trail loops
- Additional on-site parking based on further traffic and use studies

Phase 3 – Based on Further Funding Opportunities. This phase would involve the following improvements:

- Dedicated drive entry and parking in conjunction with Larch Clover Community Center
- Expansion of trail loops and overlooks
- Expansion of actively managed native habitat zones
- Construction of Interpretive Community Center

1.4.3 Operation

The Proposed Project would be open daily to informal use, including picnicking, walking, jogging, bicycling, and use of general park facilities. Consistent with existing City regulations, the proposed park would be open from dawn to dusk.

Maintenance activities would be performed by existing City of Tracy staff (including user group partnerships/use agreements that would identify shared maintenance tasks) and landscape maintenance contractors hired by the City. Maintenance activities include mowing, facility cleaning, vegetation management, and maintenance of recreation facilities.

1.4.3 Construction

Pending grant funding, project construction could commence in late fall 2020 and would be constructed in phases as described above. Consistent with the City of Tracy Municipal Code, construction would occur during daylight hours, from approximately 7:00 a.m. to 5:00 p.m. daily. Construction staging would occur on the project site in areas not proposed to support proposed improvements. Construction workers, equipment and deliveries would access the site via Tracy Boulevard and the Legacy Sports Fields Complex to the north.

Construction activities would comply with State and local regulations, including the State Water Resources Control Board's National Pollutant Discharge Elimination System (NPDES) Construction General Permit for Discharges of Stormwater Associated with Construction Activity and Land Disturbances, which requires the preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) that includes Best Management Practices (BMPs) to reduce the discharge of construction-related stormwater pollutants.

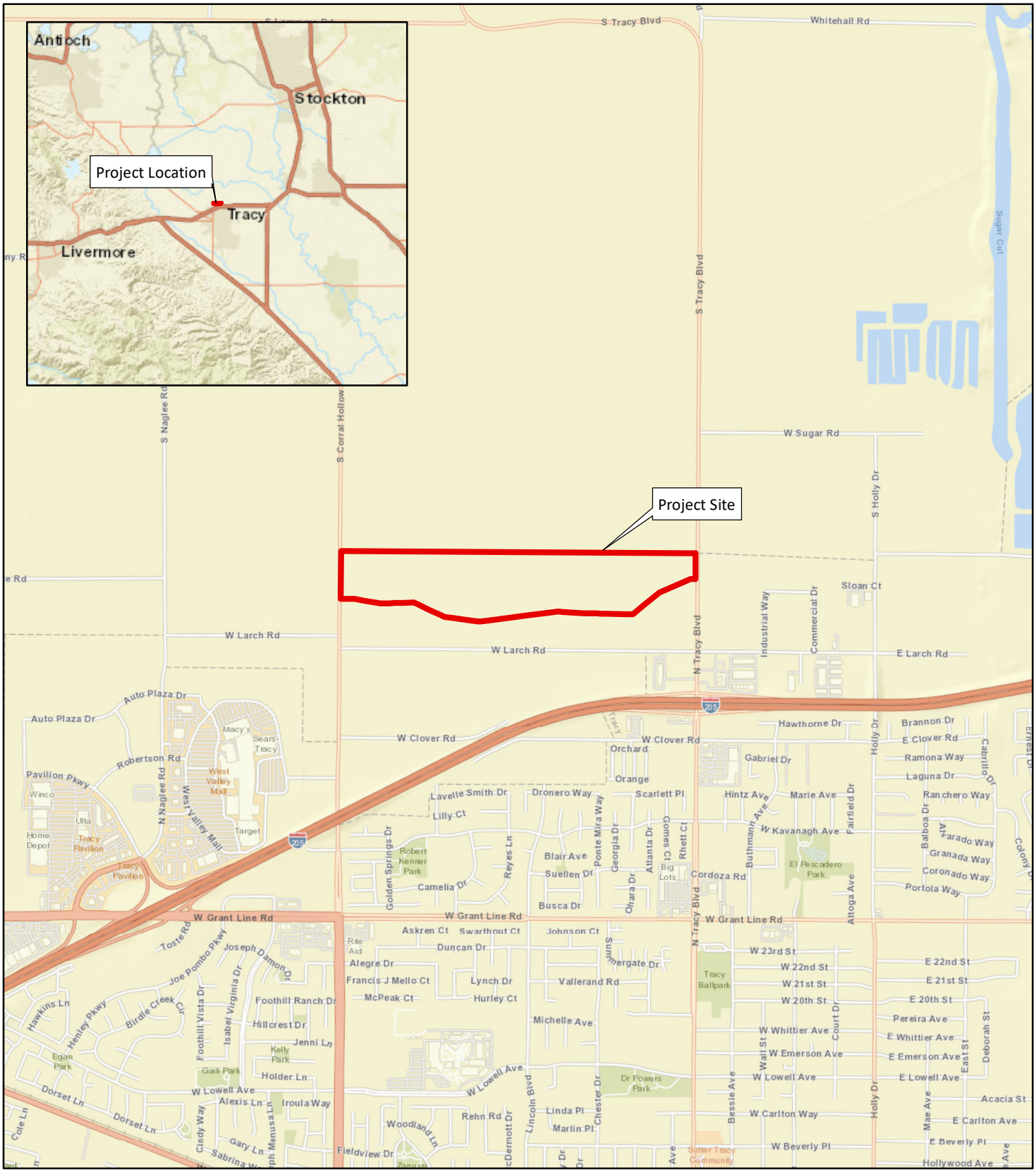
1.5 PROJECT APPROVALS

Limited permits and approvals would be required for the proposed project. While the City is the CEQA Lead Agency for the project, the State Water Resources Control Board will also have discretionary authority related to the project. A list of potential permits and approvals that may be required is provided in Table 1.

Table 1: Potential Permits and Approvals

Lead Agency	Potential Permits/Approvals
City of Tracy	• Project approval • Provision of grading, construction, traffic, erosion, and Storm Water Pollution Prevention Plan permits and approvals
Other Agencies	
State Water Resources Control Board	Construction General Permit for Discharges of Stormwater Associated with Construction Activity

Source: LSA (2020)



LSA

LEGEND

Project Site

FIGURE 1

N

0 1000 2000

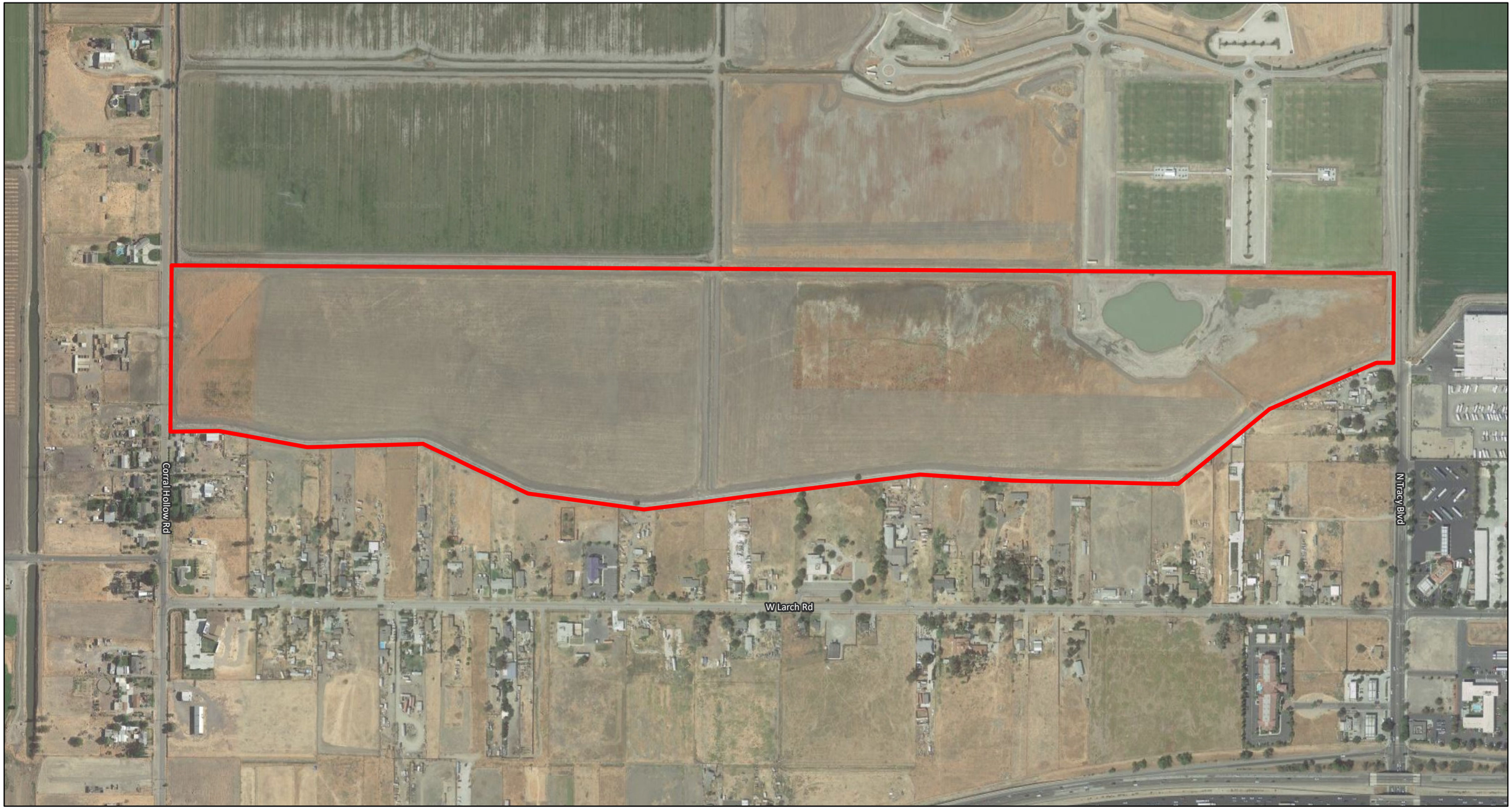
FEET

Tracy Nature Park
Tracy, California

Regional Location

SOURCE: Google Maps Sat (07/2019).

I:\WRT1902\GIS\Maps\Figure 1_Regional Location.mxd (3/18/2020)



LSA

LEGEND

Project Site Boundary

FIGURE 2

0 200 400
FEET

Tracy Nature Park
Tracy, California

Project Site

SOURCE: Google Maps Sat (07/2019).

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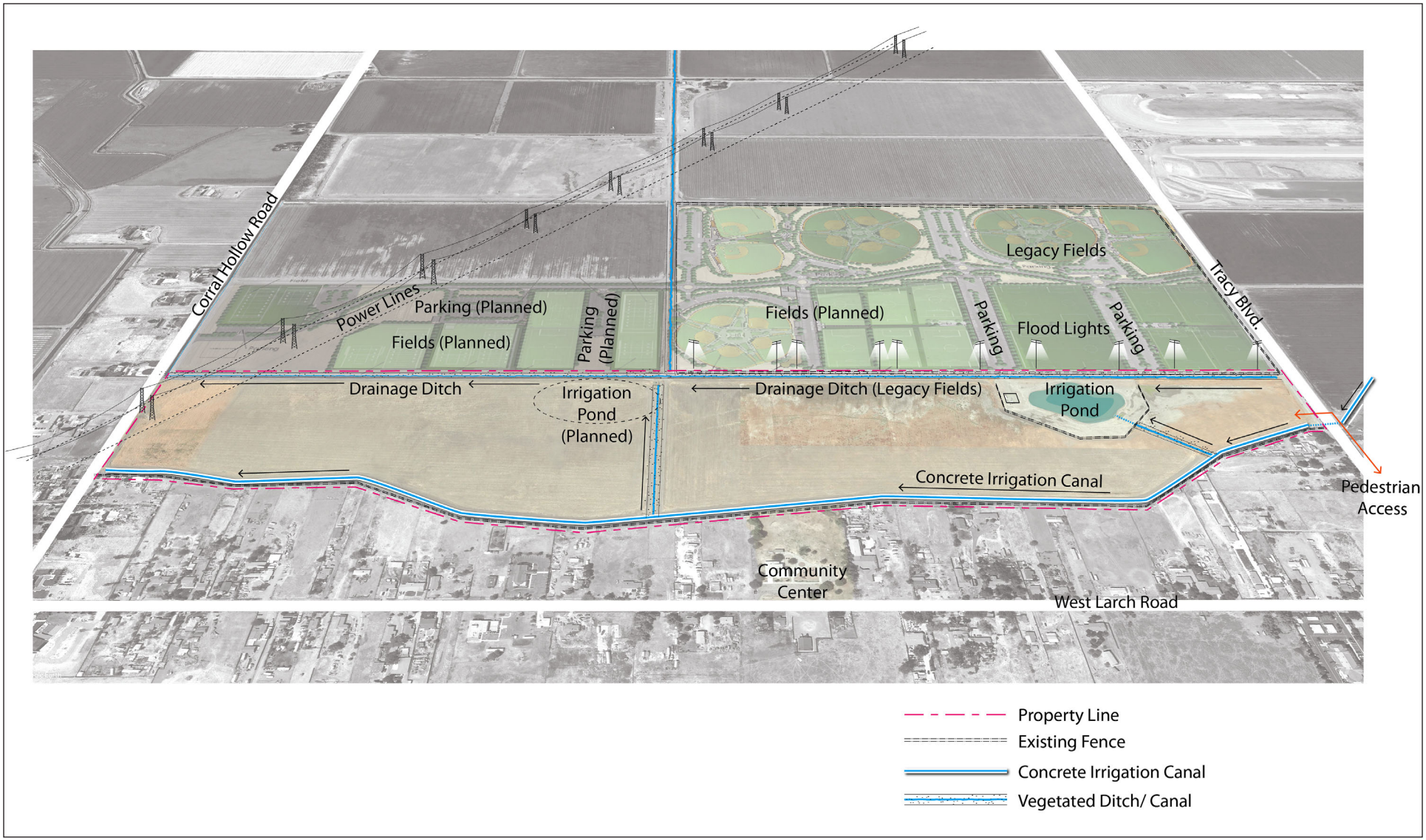

LSA

FIGURE 3

0 150 300
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N

Tracy Nature Park
Tracy, California
Existing Conditions

SOURCE: WRT, 2020.

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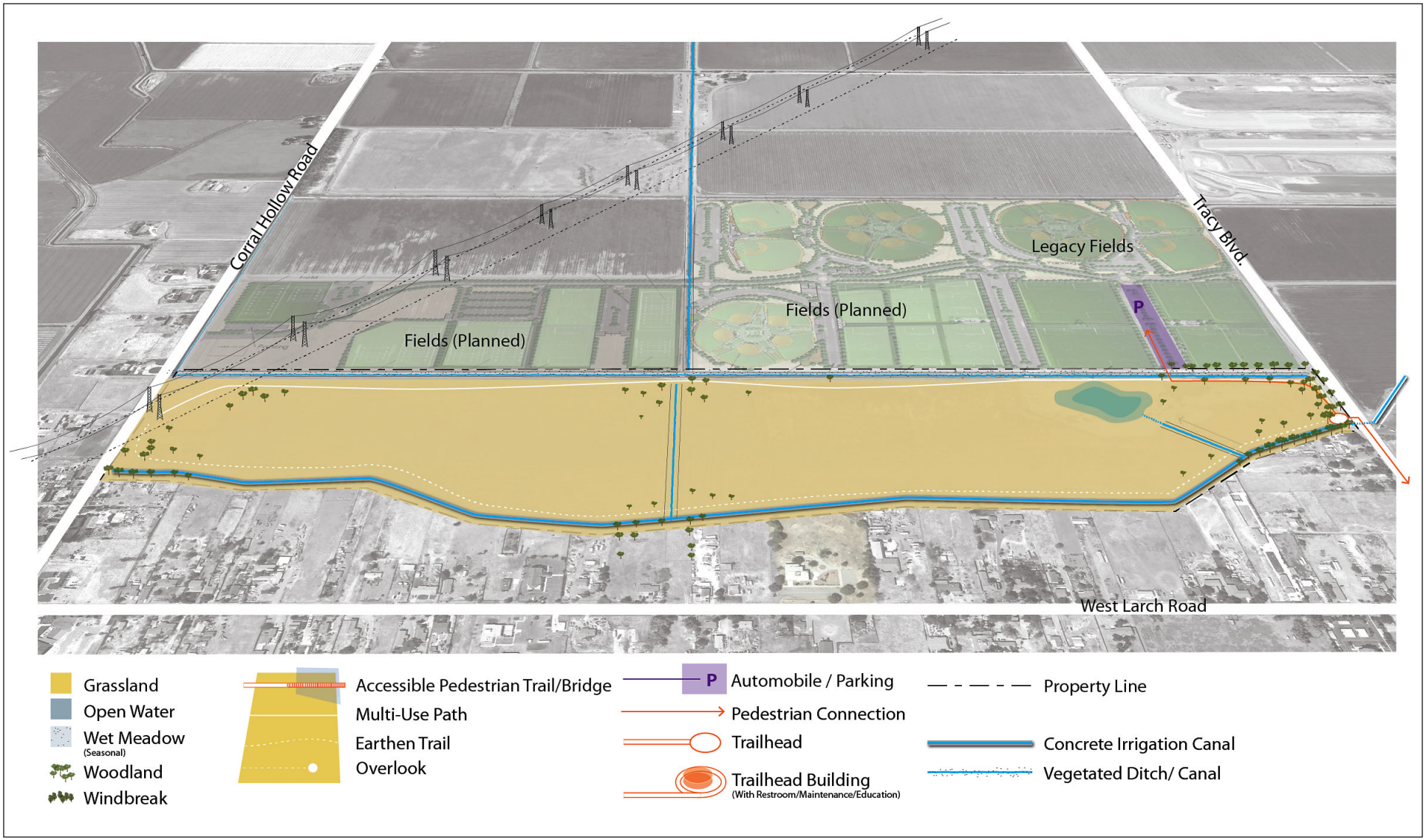

LSA

FIGURE 4

0 150 300
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N

Tracy Nature Park
Tracy, California
Proposed Improvements - Phase 0

SOURCE: WRT, 2020.

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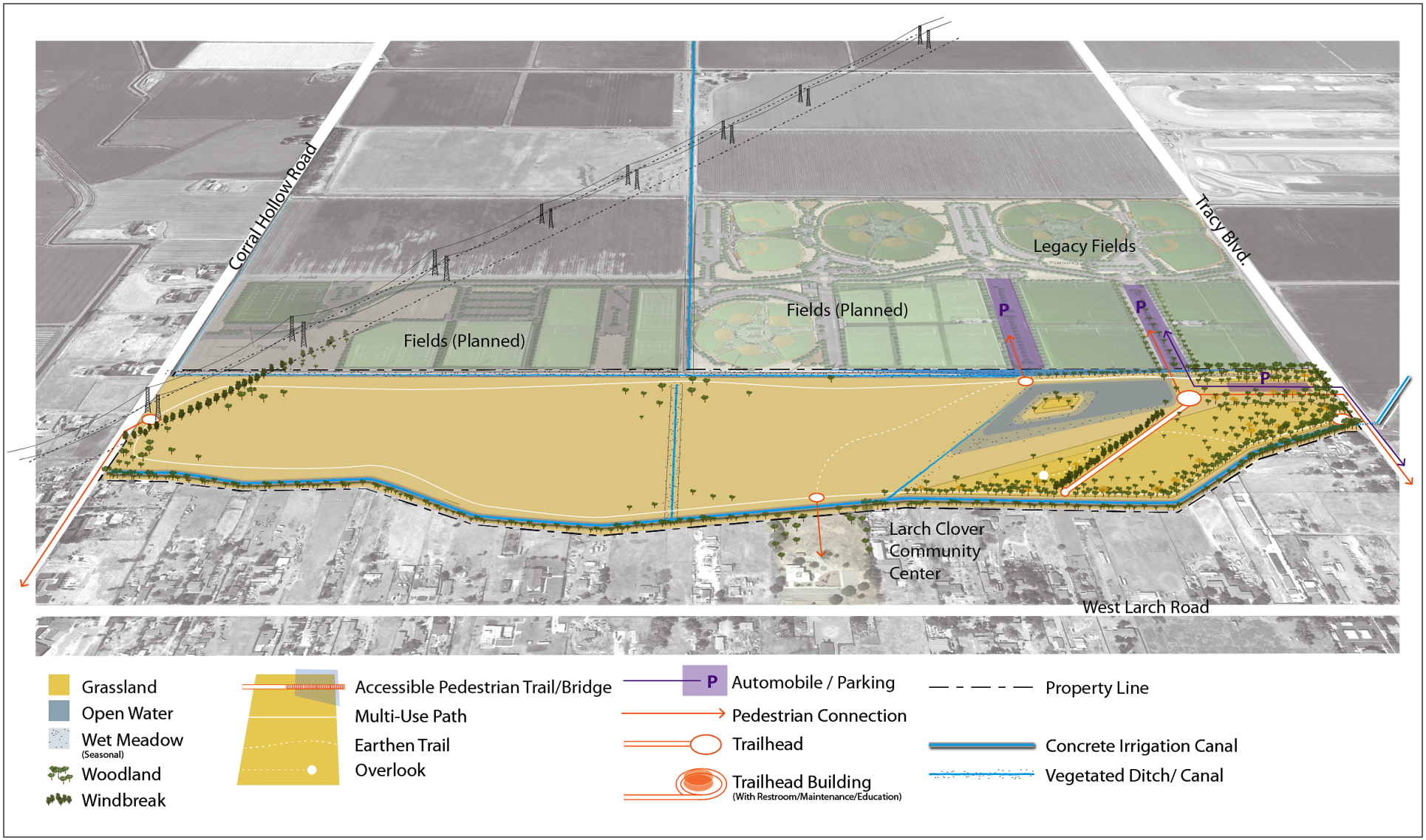

LSA

FIGURE 5

0 150 300
FEET

N

Tracy Nature Park
Tracy, California
Proposed Improvements - Phase 1

SOURCE: WRT, 2020.

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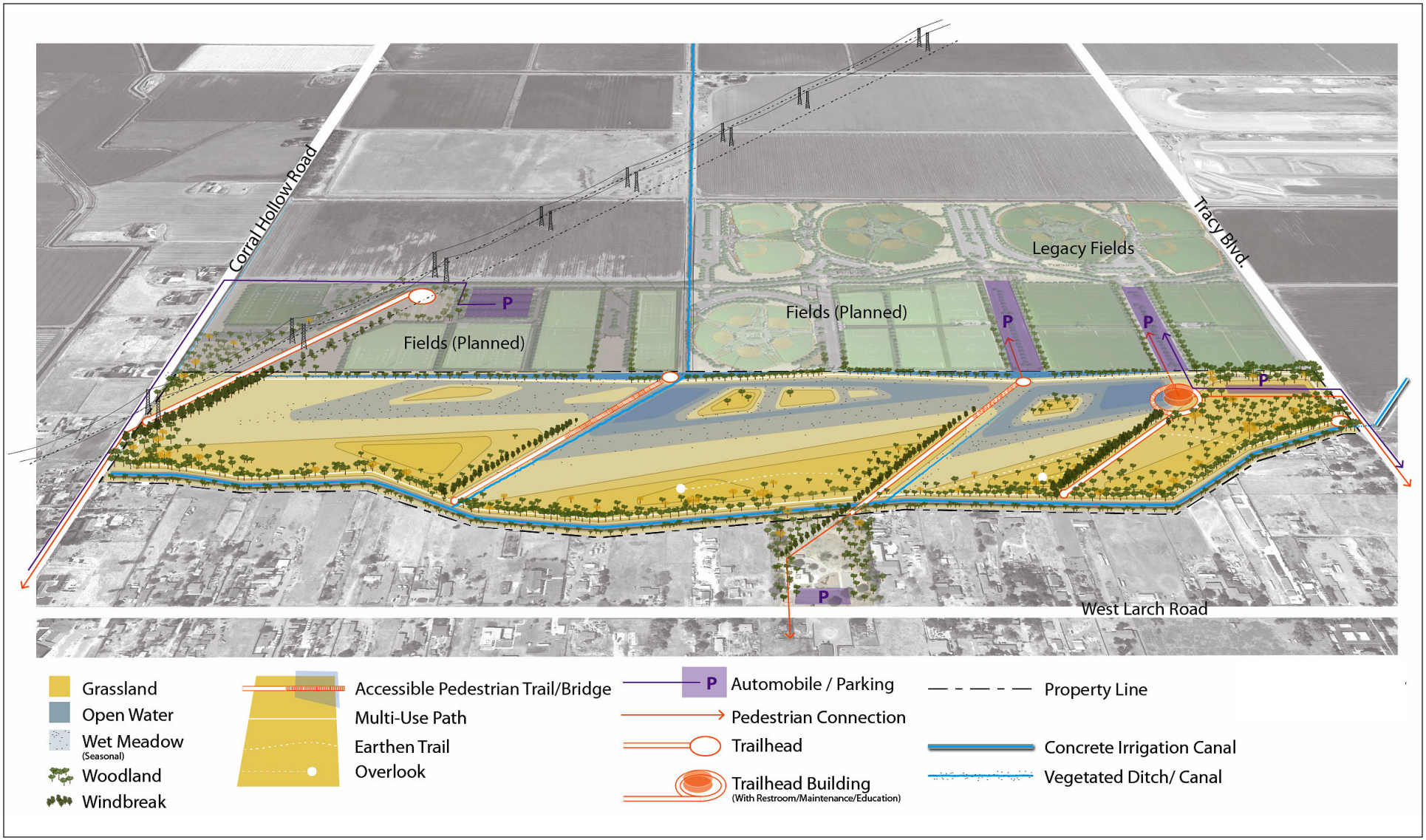

LSA

FIGURE 6

0 150 300
FEET

N

Tracy Nature Park
Tracy, California
Proposed Improvements - Phase 2

SOURCE: WRT, 2020.

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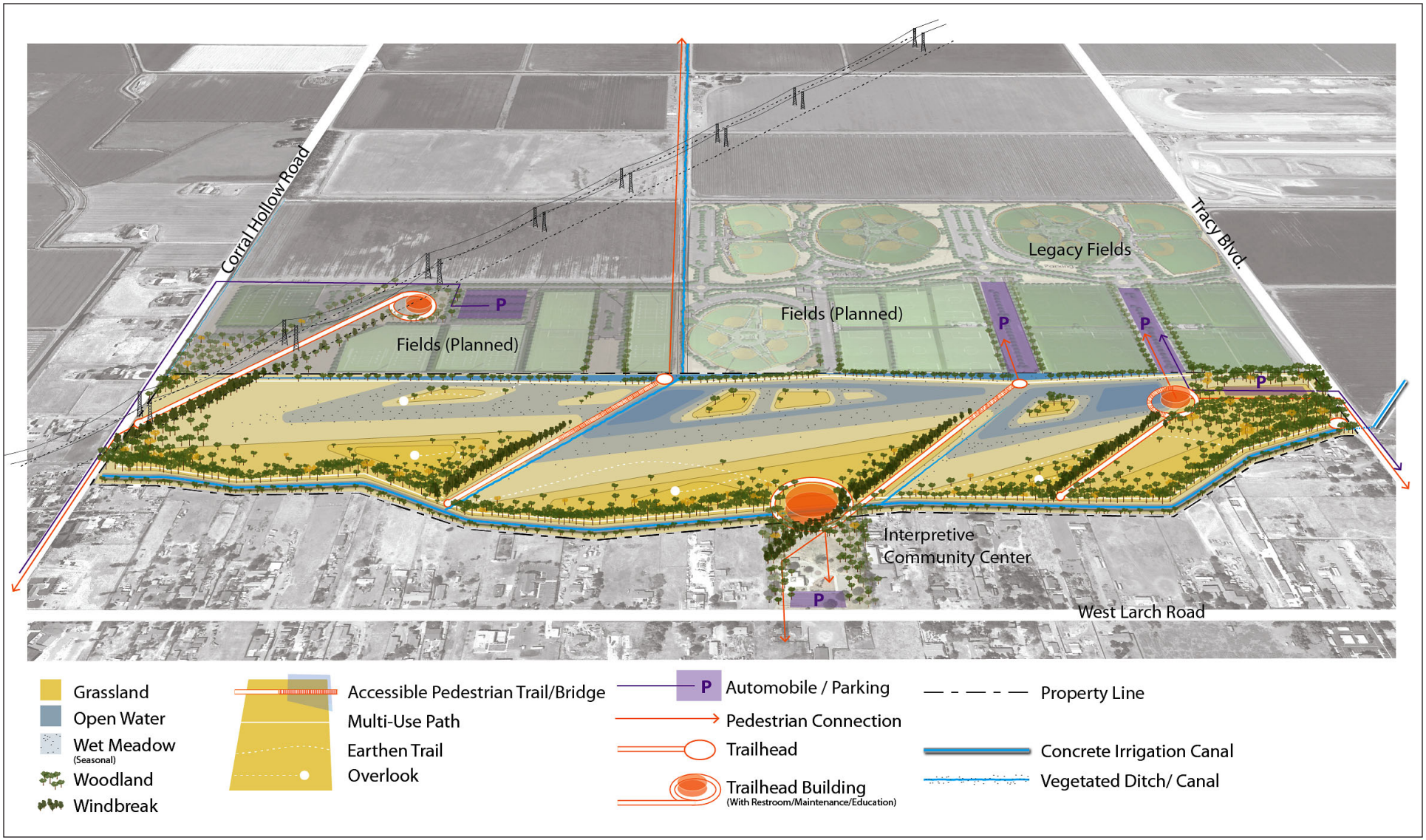

LSA

FIGURE 7

0 150 300
FEET

N

Tracy Nature Park
Tracy, California
Proposed Improvements - Phase 3

SOURCE: WRT, 2020.

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ATTACHMENT B

ENVIRONMENTAL CHECKLIST PURSUANT TO CEQA GUIDELINES SECTION 15168

CEQA Guidelines 15168(c)(4) recommends using a written checklist or similar device to confirm whether the environmental effects of a subsequent activity were adequately covered in a previous environmental document. This checklist confirms that the Tracy Nature Park Project (Proposed Project) described in Attachment A is within the scope of the Holly Sugar Sports Park Project Final Environmental Impact Report[1] (2010 EIR), adopted by the City of Tracy in June 2010.

Per CEQA Section 15164, this Addendum evaluates whether modifications and refinements to the proposed activities and improvements identified in the 2010 EIR would result in new or substantially more adverse significant effects or require new mitigation measures not identified in the 2010 EIR. The City of Tracy is the CEQA Lead Agency for this Addendum.

As discussed in this Addendum, the proposed revisions to the 2010 Project resulting from implementation of the Tracy Nature Park Master Plan would not cause new significant environmental effects not identified in the 2010 EIR, nor would impacts associated with the project revisions be substantially more severe. The analyses in this checklist also shows that no substantive changes have occurred with respect to current circumstances under which the project would be undertaken that would cause new or substantially more severe significant environmental effects than were identified in the 2010 EIR. In addition, no new information has become available that shows that the project would cause new or substantially more severe significant environmental effects which have not already been analyzed in the 2010 EIR.

[1] De Novo Planning Group. 2010. *Final Environmental Impact Report for the Holly Sugar Sports Park Project, SCH# 2008122103*. June.

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1. AESTHETICS

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

Discussion

The following includes a discussion of the potential impacts to aesthetics associated with the Proposed Project. With respect to scenic vistas, scenic resources, visual character and quality, and lighting and glare conditions within the project site and vicinity, conditions are generally the same as discussed in the 2010 EIR, with the exception that the active sports fields have been developed north of the Nature Park site.

Scenic Vistas

The project site is not designated as a scenic vista in the City of Tracy General Plan (2006) or the San Joaquin County General Plan (2016). The project site is relatively flat and the topography provides a horizontal panorama providing vistas of the Diablo Range to the south and west and the Altamont Pass to the east.

Similar to the 2010 Project, visible elements of the Proposed Project would include trails, signage, a parking area, and Interpretive Nature Center. Proposed improvements would not include any tall structures (more than one- to two-stories) that would reduce, obstruct, or degrade scenic vistas. In addition, the Proposed Project would include the installation of new landscaping and enhancement of natural habitat throughout the project area, which would improve the project area's overall visual appearance. Therefore, like the 2010 Project, the Proposed Project would not result in substantial adverse effects on a scenic vista. Impacts associated with the Proposed Project would not result in new impacts to scenic vistas or substantially increase the severity of impacts identified in the 2010 EIR.

Scenic Resources

As described in the San Joaquin County General Plan, San Joaquin County has designated 26 local roadways within the County as local scenic routes. Interstate 5 and State Routes (SR) 4 and 99 are also County-designated scenic roadways. In addition, Interstates 5 and 580 are designated as State

scenic highways. The project area is not located within the vicinity of a State Scenic Highway. No historic buildings or rock outcroppings are located on or near the vicinity of the project area. Furthermore, implementation of the project would not result in the removal or damage of scenic resources. Therefore, impacts associated with the Proposed Project would not result in new impacts to scenic resources or substantially increase the severity of impacts identified in the 2010 EIR.

Visual Character

The 2010 EIR determined that development of the Legacy Sports Complex would permanently alter the existing visual qualities of the project area, by introducing numerous park facilities and related uses into an area that is currently undeveloped and agricultural in nature and appearance. Mitigation Measure 3.1-1 was identified to reduce the visual prominence and visual impacts of the 2010 Project by installing trees, vegetation, and other landscaping to shield parking and maintenance areas from publicly accessible viewpoints. In addition, the 2010 Project included the Passive Recreation Area (project site), which would be largely retained in its existing visual character to reduce visual impacts and visibility of the site from surrounding rural residences. However, given the complete change in character of the site from undeveloped land to recreation development, impacts associated with the 2010 Project were found to be significant and unavoidable.

Implementation of the Tracy Nature Park Master Plan would change the existing visual character of the project site from undeveloped (mowed) land to a more natural landscape. The Proposed Project would include modifications to the site topography to promote the development of native habitat types. Other improvements would include trails, bridges, parking area, restroom facility and nature center. In addition, proposed improvements would include landscaping and tree planting to enhance the visual quality of the project and filter views from publicly accessible viewpoints along Tracy Boulevard, and from adjacent residential developments. As proposed, the Tracy Nature Park would continue to provide a visual buffer between the sports fields to the north and the rural residences to the south. Overall, the Proposed Project would represent an improvement to the visual quality and character of the project area through habitat creation/restoration and landscape and tree planting. Therefore, the Proposed Project would not degrade the visual character of the project site or result in a potential impact to the visual character or quality of public views of the site or the surroundings that would be more severe than the impacts identified in the 2010 EIR. Mitigation Measure 3.1-1, as described in the 2010 EIR is not required for the Proposed Project.

Light and Glare

The 2010 EIR determined that implementation of the 2010 Project would introduce new sources of light and glare into the project area. New sources of glare would occur from windshields of vehicles traveling to/from the project site and those vehicles parked on the site. Parking areas for the sports field complex are located within the interior of the site and not immediately adjacent to the rural residential uses to the south and west. Like the 2010 Project, parking associated with the Tracy Nature Park would be limited and would not be located adjacent to sensitive land uses in the project vicinity. Similar to the 2010 Project, glare impacts associated with the Proposed Project would be less than significant.

The 2010 EIR determined that light sources from the proposed sports fields complex may have a significant adverse impact on the surrounding areas by introducing nuisance light into the area and decreasing the visibility of nighttime skies. On-site light sources associated with the active sports

fields, and security lighting at the parking areas and restrooms may create light spillover impacts on surrounding land uses. Mitigation Measure 3.1-2 was identified to reduce impacts associated with nighttime lighting and light spillage onto adjacent properties from the active sports fields. However, given that nighttime lighting in the project area would still increase even with implementation of mitigation, nighttime lighting impacts associated with the 2010 Project were found to be significant and unavoidable.

The project site is located in a largely rural area. Streetlights, vehicle head and taillights on area roadways, and lighting associated with the adjacent Legacy Fields Sports Complex are the existing sources of light and glare in the project area. As part of the Proposed Project, security/safety lighting may be installed at proposed structures including the Interpretive Nature Center, restrooms, and parking lot. Lighting would consist of pole-mounted light fixtures similar to the security lighting installed at the parking lots and restrooms within the Legacy Fields Sports Complex. Light levels would be sufficient to provide security/safety, but are not intended to promote use of the park during the nighttime hours. Title 10.08.4000 of the Tracy Municipal Code requires that the site plan and architectural package include the existing lighting standards and devices and be reviewed by the Development and Engineering Department. Consistent with the policies outlined in the City's Municipal Code, each light fixture would be directed downward and away from adjoining properties and public right of way, so that no on-site light fixture would directly illuminate any off-site areas. With adherence to these requirements, the proposed project would not create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area. This impact would be less than significant and no mitigation would be required.

Applicable Mitigation

As described in the 2010 EIR, mitigation measures were identified to reduce the visual impacts associated with the 2010 Project, particularly the development of the active sports fields uses north of the Nature Park site. As described above, implementation of the Proposed Project would not result in any significant visual resources impacts; therefore, Mitigation Measures 3.1-1 and 3.1-2 would not apply to the Proposed Project.

Conclusion

Based on the above analysis and discussion, no substantive revisions to the 2010 EIR are required, because no new significant impacts or impacts of substantially greater severity than those identified in the 2010 EIR would result from the Proposed Project. Visual impacts associated with the Proposed Project would be less than the impacts resulting from the 2010 Project; therefore, the mitigation measures identified in the 2010 EIR are not required for the Proposed Project.

2. AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and the forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Discussion

The project area is classified as "Farmland of Local Importance" by the State Department of Conservation.[2] Farmland of Local Importance includes land that is or has been used for irrigated pasture, dryland farming, confined livestock or dairy facilities, aquaculture, poultry facilities and dry grazing. It also includes soils previously designated by soil characteristics as "Prime Farmland," Farmland of Statewide Importance," and "Unique Farmland" that has since become idle.

As described in the 2010 EIR, the entire 298-acre project site evaluated in the 2010 EIR was designated as Unique Farmland by the California Department of Conservation and zoned for agricultural use. At the time the 2010 EIR was prepared, the project site was actively farmed with

[2] California, State of, 2016. Department of Conservation. California Important Farmland Finder. Website: maps.conservation.ca.gov/dlrp/ciff (accessed March 15, 2020).

alfalfa. The 2010 EIR determined that implementation of the 2010 Project would permanently remove 298 acres from agricultural production, resulting in a significant impact. In addition, the 2010 EIR determined that the 2010 Project would introduce increased human activity in the area and may result in nuisances to the adjacent agricultural operations. Mitigation Measures 3.2-1 through 3.2-4 were identified to help reduce the significance of the impacts to agricultural resources through payment of fees to preserve farmland, establishment of fencing/buffers, and coordination with adjacent agricultural operators. However, implementation of the 2010 Project would still result in a net loss of Important Farmland; therefore, the 2010 EIR determined that this impact would remain significant and unavoidable. Other impacts related to agricultural resources were determined to be less than significant with implementation of mitigation.

Since certification of the 2010 EIR, the City has developed the Legacy Fields Sports Complex, and constructed an irrigation pond on the project site to serve the sports fields complex. Other areas of the project have been routinely disked/mowed. No agricultural uses currently exist on the project site. Further, the project site is zoned P (Park) on the City's zoning map;[3] therefore, the project area is not zoned for agricultural use nor is the project under a Williamson Act contract.[4] No forest land or timberland is identified on or in the vicinity of the project area, and the project area is not zoned for forest or timber uses. Therefore, the Proposed Project would have no impact on agricultural and forestry resources.

Applicable Mitigation

Mitigation Measures 3.2-1 through 3.2-4 were implemented as part of the 2010 Project. Since certification of the 2010 EIR, the City has developed the Legacy Sports Fields Complex to the north and the project site has been routinely mowed. The Proposed Project would have no impact on agricultural resources; therefore, no mitigation is required.

Conclusion

Based on the above analysis and discussion, no substantive revisions to the 2010 EIR are required, because no new significant impacts or impacts of substantially greater severity than those identified in the 2010 EIR would result from the Proposed Project. Like the 2010 Project, the Proposed Project would have no impact on agricultural or forestry resources and mitigation would not be required.

[3] Tracy, City of, 2020. Interactive Zoning Map. Website: https://www.ci.tracy.ca.us/?navid=442 (accessed March 15, 2020).

[4] San Joaquin, County of, 2015. San Joaquin County Williamson Act Parcels dataset, San Joaquin Valley Gateway website: https://sjvp.databasin.org/datasets/a32f8f44b4524b07b1861e779a0857c0 (accessed March 15, 2020).

3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☐	☒
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒
d. Result in other emissions (such as those leading to odors) affecting a substantial number of people?	☐	☐	☐	☒

Discussion

The City of Tracy is part of the San Joaquin Valley Air Basin (SJVAB), which is within the jurisdiction of the San Joaquin Valley Air Pollution Control District (SJVAPCD). The SJVAPCD is responsible for air quality regulation within the eight-county San Joaquin Valley region.

Both the State of California (State) and the federal government have established health-based Ambient Air Quality Standards (AAQS) for six criteria air pollutants: carbon monoxide (CO), ozone (O_3), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), lead (Pb), and suspended particulate matter ($PM_{2.5}$ and PM_{10}). The SJVAB is designated as non-attainment for O_3 and $PM_{2.5}$ for federal standards and non-attainment for O_3, PM_{10}, and $PM_{2.5}$ for State standards.

Based on the SJVAPCD attainment status and ambient air quality monitoring data, ambient air quality in the vicinity of the project site has basically remained unchanged since approval of the 2010 EIR. However, the SJVAPCD has made a key regulatory change since the 2010 EIR was certified. The most recent *Guidance for Assessing and Mitigating Air Quality Impacts* (GAMAQI)[5] was adopted March 19, 2015 and assists lead agencies and project applicants in evaluating the potential air quality impacts of projects in the SJVAB. These changes in the project circumstances, as well as changes to the Proposed Project itself, are discussed and evaluated in the following section.

[5] San Joaquin Valley Air Pollution Control District, 2015. *Guidance for Assessing and Mitigating Air Quality Impacts*. March 19. Website: www.valleyair.org/transportation/ceqa_idx.htm (accessed January 2019).

Clean Air Plan Consistency

An air quality plan describes air pollution control strategies to be implemented by a city, county, or region classified as a non-attainment area. The main purpose of the air quality plan is to bring the area into compliance with the requirements of the federal and State air quality standards.

The 2010 EIR did not evaluate whether the 2010 Project would conflict with or obstruct implementation of an applicable air quality plan. To bring the San Joaquin Valley into attainment, the SJVAPCD has developed the 2013 Plan for the Revoked 1-Hour Ozone Standard (Ozone Plan), adopted on September 19, 2013.[6] The SJVAPCD also adopted the 2016 Plan for the 2008 8-Hour Ozone Standard in June 2016 to satisfy Clean Air Act requirements and ensure attainment of the 75 parts per billion (ppb) 8-hour ozone standard.[7]

To assure the SJVAB's continued attainment of the USEPA PM_{10} standard, the SJVAPCD adopted the 2007 PM_{10} Maintenance Plan in September 2007.[8] SJVAPCD Regulation VIII (Fugitive PM_{10} Prohibitions) is designed to reduce PM_{10} emissions generated by human activity. The SJVAPCD adopted the 2018 Plan for the 1997, 2006, and 2012 $PM_{2.5}$ Standards in November 2018 to address the USEPA 1997 annual $PM_{2.5}$ standard of 15 µg/m^3 and 24-hour $PM_{2.5}$ standard of 65 µg/m^3, the 2006 24-hour $PM_{2.5}$ standard of 35 µg/m^3, and the 2012 annual $PM_{2.5}$ standard of 12 µg/m^3.[9]

CEQA requires that certain proposed projects be analyzed for consistency with the applicable air quality plan. For a project to be consistent with SJVAPCD air quality plans, the pollutants emitted from a project should not exceed the SJVAPCD emission thresholds or cause a significant impact on air quality. In addition, emission reductions achieved through implementation of offset requirements are a major component of the SJVAPCD air quality plans. As discussed below, construction of the Proposed Project would not result in the generation of criteria air pollutants that would exceed SJVAPCD thresholds of significance. Implementation of Mitigation Measures 3.3-1 and 3.3-2 would further reduce construction dust impacts. Operational emissions associated with the Proposed Project would also not exceed SJVAPCD established significance thresholds. Therefore, the Proposed Project would not conflict with or obstruct implementation of SJVAPCD air quality plans. As such, the Proposed Project would not result in any new or more significant impacts related to clean air plan consistency than previously analyzed in the 2010 EIR.

Construction-Related Impacts

The 2010 EIR did not quantify construction emissions; however the 2010 EIR determined that construction activities could generate dust and vehicle emissions that are primarily related to

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6 San Joaquin Valley Air Pollution Control District, 2013. *2013 Plan for the Revoked 1-Hour Ozone Standard*. September 19. Website: www.valleyair.org/Air_Quality_Plans/Ozone-OneHourPlan-2013.htm (accessed March 2020).

7 San Joaquin Valley Air Pollution Control District, 2016. *2016 Plan for the 2008 8-Hour Ozone Standard*. June 16. Website: www.valleyair.org/Air_Quality_Plans/Ozone-Plan-2016.htm (accessed March 2020).

8 San Joaquin Valley Air Pollution Control District, 2007. *2007 PM_{10} Maintenance Plan and Request for Redesignation*. Available online at: www.valleyair.org/Air_Quality_Plans/docs/Maintenance%20Plan10-25-07.pdf (accessed March 2020).

9 San Joaquin Valley Air Pollution Control District, 2018. *2018 Plan for the 1997, 2006, and 2012 $PM_{2.5}$ Standards*. November 15. Website: http://valleyair.org/pmplans/documents/2018/pm-plan-adopted/2018-Plan-for-the-1997-2006-and-2012-PM2.5-Standards.pdf (accessed March 2020).

grading and other ground-preparation activities. The 2010 EIR also determined that with implementation of Mitigation Measures 3.3-1 and 3.3-2, which include SJVAPCD-recommended PM_{10} fugitive dust rules and equipment exhaust emissions controls as required by Regulation VIII, construction-related emissions would be mitigated to a less-than-significant level.

Construction emissions were estimated for the Proposed Project using the California Emissions Estimator Model (CalEEMod) version 2016.3.2, consistent with SJVAPCD recommendations. As identified in the Project Description, pending grant funding, project construction could commence in late fall 2020 and would be constructed in phases. To be conservative, this analysis assumes construction would occur for approximately 24 months. Construction-related emissions are presented in Table 1. CalEEMod output sheets are included in Appendix A.

Table 1: Project Construction Emissions (Tons per Year)

	CO	NO_x	ROG	SO_x	PM_{10}	$PM_{2.5}$
2020	0.5	0.9	0.1	<0.1	0.4	0.3
2021	5.8	7.9	0.8	<0.1	1.8	0.8
2022	6.0	7.2	1.2	<0.1	1.6	0.5
SJVAPCD Significance Threshold	100.0	10.0	10.0	27.0	15.0	15.0
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: LSA (March 2020).

As shown in Table 1, construction emissions associated with the Proposed Project would be below the SJVAPCD's significance thresholds. As identified above, the 2010 EIR required the implementation of Mitigation Measures 3.3-1 and 3.3-2, which included the SJVAPCD's Regulation VIII measures to reduce construction emissions to a less-than-significant level. With implementation of Mitigation Measures 3.3-1 and 3.3-2, the Proposed Project would not result in new significant impacts beyond those identified in the 2010 EIR and no new mitigation measures are required.

Regional Air Pollutant Emissions

As discussed in the 2010 EIR, the 2010 Project would be an indirect source of air pollutants, in that it would attract and cause an increase in vehicle trips in the region. The 2010 Project would also be an area source of emissions, primarily from the maintenance and landscaping activities. As identified in the 2010 EIR, the 2010 Project's operational emissions would be below the SJVPACD's thresholds. As such, the 2010 EIR determined that the 2010 Project would result in less-than-significant air quality impacts.

However, the 2010 EIR also determined that regardless of the emissions totals, the 2010 Project would be subject to the requirements of SJVAPCD Rule 9510, which requires developers of large residential, commercial, and industrial projects to reduce smog-forming (NO_x) and particulate (PM_{10} and $PM_{2.5}$) emissions generated by their projects. The Rule applies to projects and project developers are required to reduce:

- 20 percent of construction-exhaust nitrogen oxides;
- 45 percent of construction-exhaust PM_{10};

- 33 percent of operational nitrogen oxides over 10 years; and
- 50 percent of operational PM_{10} over 10 years.

The 2010 EIR indicated that developers are encouraged to meet these reduction requirements through the implementations of on-site mitigation; however, if the on-site mitigation does not achieve the required baseline emission reductions, the developer will mitigate the difference by paying an off-site fee to the SJVAPCD. The 2010 EIR identified Mitigation Measure 3.3-3 to meet the requirements of SJVAPCD Rule 9510 and determined that impacts would be reduced to a less-than-significant level.

Similar to the 2010 EIR, the Proposed Project would result in mobile air quality emissions from increased vehicle trips and area source air quality impacts such as emissions generated from the use of landscaping equipment. Emission estimates for operation of the Proposed Project were calculated using CalEEMod. As identified in Section 17, Transportation, the Proposed Project is estimated to generate 67 daily trips, which was included in CalEEMod. The annual emissions associated with operational trip generation, energy, and area sources are identified in Table 2 below. CalEEMod output sheets are included in Appendix A.

Table 2: Project Operation Emissions (Tons per Year)

	CO	NO_x	ROG	SO_x	PM_{10}	$PM_{2.5}$
Area Source Emissions	<0.1	<0.1	0.3	0.0	0.0	0.0
Energy Source Emissions	0.0	0.0	0.0	0.0	0.0	0.0
Mobile Source Emissions	0.1	0.1	<0.1	<0.1	0.1	<0.1
Total Project Operation Emissions	0.1	0.1	0.3	<0.1	0.1	<0.1
SJVAPCD Significance Threshold	100.0	10.0	10.0	27.0	15.0	15.0
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: LSA (March 2020).

The results shown in Table 2 indicate that the Proposed Project would not exceed the SJVAPCD's thresholds. As identified above, the 2010 EIR required the implementation of Mitigation Measure 3.3-3, which requires projects to meet the requirements of SJVAPCD Rule 9510. With implementation of Mitigation Measure 3.3-3, the Proposed Project would not result in new significant impacts beyond those identified in the 2010 EIR and no new mitigation measures are required.

Localized Carbon Monoxide Concentrations

The 2010 EIR found that since the 2010 Project is within an attainment area for carbon monoxide (ambient air quality standards are currently attained) and in an area with low background concentrations, changes in carbon monoxide levels resulting from the 2010 Project would not result in violations of the ambient air quality standards, and would represent a less than significant impact. Similar to the 2010 Project, the Proposed Project is within an attainment area for carbon monoxide (ambient air quality standards are currently attained) and in an area with low background concentrations. Additionally, the Proposed Project is only expected to generate approximately 67

daily trips. Therefore, the Proposed Project would not create impacts related to local CO emissions that would be more severe than impacts identified in the 2010 EIR.

Naturally Occurring Asbestos

As identified in the 2010 EIR, pursuant to guidance issued by the Governor's Office of Planning and Research (OPR), Lead Agencies are encouraged to analyze potential impacts related to naturally occurring asbestos (NOA). NOA can be released from serpentine soils and ultramafic rocks when the rocks are broken or crushed or when soils are disturbed. At the point of release, the asbestos fibers may become airborne, causing air quality and human health hazards.

Serpentine soils and/or ultramafic rock are known to be present in 44 of California's 58 counties. These rocks and soils are particularly abundant in the counties of the Sierra Nevada foothills, the Klamath Mountains and Coast Ranges. According to the General Location Guide for Ultramafic Rock in California – Areas More Likely to Contain Naturally Occurring Asbestos, serpentine soils and ultramafic rocks are not known to occur within the Holly Sugar Sports Park project site, and thus, it was determined that there is no potential that the 2010 Project would disturb NOA and impacts were considered to be less than significant. Like the 2010 Project, there is no potential that the Proposed Project would disturb NOA and impacts would remain less than significant. As such, the Proposed Project would not result in any new or more significant impacts related to NOA than previously analyzed in the 2010 EIR.

Sensitive Receptors

As discussed in the 2010 EIR, implementation of the 2010 Project would not result in the long-term operation of any major on-site stationary sources of toxic air contaminants (TACs). In addition, no major stationary sources of TACs have been identified in the vicinity of the project site. Therefore, implementation of the 2010 Project would not be anticipated to result in an increased exposure of sensitive receptors to localized concentrations of TACs that would exceed applicable standards. As such, this impact was considered less than significant.

Like the 2010 Project, the Proposed Project would not result in the long-term operation of any major on-site stationary sources of TACs. Construction activities associated with the Proposed Project would generate airborne particulates and fugitive dust, as well as a small quantity of pollutants associated with the use of construction equipment (e.g., diesel-fueled vehicles and equipment) on a short-term basis. However, construction contractors would be required to implement measures to reduce or eliminate emissions by implementing Mitigation Measures 3.3-1 and 3.3-2, as described above. Project construction emissions would be well below SJVAPCD significance thresholds. Therefore, the Proposed Project would not expose sensitive receptors to substantial pollutant concentrations and impacts would remain less than significant. As such, the Proposed Project would not result in any new or more significant impacts than previously analyzed in the 2010 EIR.

Objectionable Odors

As discussed in the 2010 EIR, potential odors generated during construction and operational activities would result in less than significant impacts. Similar to the 2010 Project, during construction of the Proposed Project, some odors may be present due to diesel exhaust. However,

these odors would be temporary and limited to the construction period. The Proposed Project would not include any activities or operations that would generate objectionable odors and once operational, the Proposed Project would not be a source of odors. Therefore, the Proposed Project would not create objectionable odors affecting a substantial number of people. Therefore, similar to the 2010 Project, the Proposed Project would not create objectionable odors affecting a substantial number of people, and impacts would be less than significant.

Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to the project, nor new information that could not have been known at the time the 2010 EIR was adopted leading to new or more severe significant impacts, and no new mitigation measures are required. Mitigation Measures 3.3-1, 3.3-2, and 3.3-3 previously identified in the 2010 EIR, would remain applicable to the Proposed Project, as follows:

MM 3.3-1: Prior to the commencement of grading activities, the City shall require the contractor hired to complete the grading activities to prepare a construction emissions reduction plan that meets the requirements of SJVAPCD Rule VIII. The construction emissions reductions plan shall be submitted to the SJVAPCD for review and approval. The City of Tracy shall ensure that all required permits from the SJVAPCD have been issued prior to commencement of grading activities. The construction emissions reduction plan should include the following requirements and measures:

- Properly and routinely maintain all construction equipment, as recommended by manufacturer's manuals, to control exhaust emissions.
- Shut down equipment when not in use for extended periods of time, to reduce exhaust emissions associated with idling engines.
- Encourage ride-sharing and of use transit transportation for construction employees commuting to the project site.
- Use electric equipment for construction whenever possible in lieu of fossil fuel-powered equipment.
- Curtail construction during period of high ambient pollutant concentrations.
- Construction equipment shall operate no longer than eight cumulative hours per day.
- All construction vehicles shall be equipped with proper emission control equipment and kept in good and proper running order to reduce NO_x emissions.
- On-road and off-road diesel equipment shall use aqueous diesel fuel if permitted under manufacturer's guidelines.

- On-road and off-road diesel equipment shall use diesel particulate filters if permitted under manufacturer's guidelines.
- On-road and off-road diesel equipment shall use cooled exhaust gas recirculation (EGR) if permitted under manufacturer's guidelines.
- Use of Caterpillar pre-chamber diesel engines or equivalent shall be utilized if economic and available to reduce NO_x emissions.
- All construction activities within the project site shall be discontinued during the first stage smog alerts.
- Construction and grading activities shall not be allowed during first stage ozone alerts. (First stage ozone alerts are declared when ozone levels exceed 0.20 ppm for the 1-hour average.)

MM 3.3-2: The following mitigation measures, in addition to those required under Regulation VIII of the SJVAPCD, shall be implemented by the City's contractor during all phases of project grading and construction to reduce fugitive dust emissions:

- Water previously disturbed exposed surfaces (soil) a minimum of three-times/day or whenever visible dust is capable of drifting from the site or approaches 20 percent opacity.
- Water all haul roads (unpaved) a minimum of three-times/day or whenever visible dust is capable of drifting from the site or approaches 20 percent opacity.
- All access roads and parking areas shall be covered with asphalt-concrete paving or water sprayed regularly.
- Dust from all on-site and off-site unpaved access roads shall be effectively stabilized by applying water or using a chemical stabilizer or suppressant.
- Reduce speed on unpaved roads to less than 15 miles per hour.
- Install and maintain a trackout control device that meets the specifications of SJVAPCD Rule 8041 if the site exceeds 150 vehicle trips per day or more than 20 vehicle trips be day by vehicles with three or more axles.
- Stabilize all disturbed areas, including storage piles, which are not being actively utilized for construction purposes using water, chemical stabilizers or by covering with a tarp, other suitable cover or vegetative ground cover.
- Control fugitive dust emissions during land clearing, grubbing, scraping, excavation, leveling, grading or cut and fill operations with application of water or by presoaking.

- When transporting materials offsite, maintain a freeboard limit of at least six inches and over or effectively wet to limit visible dust emissions.
- Limit and remove the accumulation of mud and/or dirt from adjacent public roadways at the end of each workday. (Use of dry rotary brushes is prohibited except when preceded or accompanied by sufficient wetting to limit visible dust emissions and the use of blowers is expressly forbidden.)
- Remove visible track-out from the site at the end of each workday.
- Cease grading activities during periods of high winds (greater than 20 mph over a one-hour period).
- Asphalt-concrete paving shall comply with SJVAPCD Rule 4641 and restrict use of cutback, slow-sure, and emulsified asphalt paving materials.

MM 3.3-3: Prior to the award of the contract to construct the project, the City of Tracy shall coordinate with the SJVAPCD to verify that the project meets the requirements of District Rule 9510, which is aimed at the following reductions:

- 20 percent of construction-exhaust nitrogen oxides;
- 45 percent of construction-exhaust PM_{10};
- 33 percent of operational nitrogen oxides over 10 years;
- and 50 percent of operational PM_{10} over 10 years.

The City shall coordinate with SJVAPCD to develop measures and strategies to reduce operational emissions from the proposed project. If feasible measures are not available to meet the emissions reductions targets outlined above, then the City may be required to pay an in-lieu mitigation fee to the SJVAPCD to off-set project-related emissions impacts. If in-lieu fees are required, the City shall coordinate with the SJVAPCD to calculate the amount of the fees required to off-set project impacts.

Conclusion

Based on the above analysis and discussion, no substantive revisions to the 2010 EIR are required, because no new significant impacts or impacts of substantially greater severity than those identified in the 2010 EIR would result from the Proposed Project. With implementation of Mitigation Measures 3.3-1, 3.3-2, and 3.3-3 potential impacts would be less-than-significant and additional mitigation is not required.

4. BIOLOGICAL RESOURCES

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Discussion

Methods

For this analysis, an LSA biologist reviewed the City of Tracy General Plan Draft EIR,[10] the Holly Sugar Sports Park Public Draft EIR,[11] the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP),[12] the California Department of Fish and Wildlife's (CDFW) California Natural

[10] Design, Community, and Environment. 2009. City of Tracy General Plan Draft Supplemental EIR. April 22.
[11] De Novo Planning Group. 2009. Holly Sugar Sports Park Public Draft EIR. August 31.
[12] SJMSCP Steering Committee. 2000. San Joaquin County Multi-Species Habitat Conservation and Open Space Plan. November 14.

Diversity Database,[13] the California Native Plant Society's Inventory of Rare and Endangered Plants,[14] and the U.S. Fish and Wildlife Service's Information for Planning and Consultation (IPaC) on-line database[15] in order to review special-status plant and wildlife species that could occur on or adjacent to the project site.

An LSA biologist conducted a reconnaissance-level survey at the project site on July 26, 2019. The purpose of this survey was to map existing habitats and assess the potential for such habitats to support special-status species and sensitive plant and wildlife communities. During the field survey, the LSA biologist also evaluated the presence of potentially jurisdictional waters of the United States/waters of the State (including adjacent wetlands) on the site that would be subject to regulation under Section 404 of the Clean Water Act and/or the California Porter-Cologne Water Quality Control Act.

Plant taxonomy and nomenclature in this section follows Baldwin et al.[16] Common and scientific names for special-status species or subspecies conform to the California Natural Diversity Database (CNDDB).[17] Common and scientific names for fish, reptiles, amphibians, birds, and mammals conform to Nelson and others,[18] Crother,[19] the American Ornithologists' Union (AOU) *Check-list of North American Birds*,[20] and Baker and others,[21] respectively.

Plants

During the time of LSA's 2019 visit, the majority of the project site was fallow and supported sparse, non-native annual grasses and ruderal (weedy) plant species, such as annual blue grass (*Poa annua*) and strawberry clover (*Trifolium fragiferum*). A few scattered trees, such as coast live oak (*Quercus agrifolia*) and western sycamore (*Platanus racemosa*) were also present at the site.

In February 2009 when the site was surveyed as part of the 2010 EIR, the project site was largely covered with alfalfa with limited non-native vegetation along the access roads and irrigation ditches. Non-native plants observed in 2009 included Italian ryegrass (*Festuca perennis*), rip-gut brome

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13 California Department of Fish and Wildlife, 2019. *California Natural Diversity Database (CNDDB),* commercial version dated July 2019. Biogeographic Data Branch, California Department of Fish and Wildlife, Sacramento.

14 California Native Plant Society, 2019. *Inventory of rare and endangered plants in California* (online edition, v8-02). California Native Plant Society, Sacramento. Website: www.cnps.org/inventory. July 26.

15 United States Fish and Wildlife Service. 2019. Information for Planning and Consultation (IPAC) online database. July 26.

16 Baldwin, B. G., et al., editors, 2012. *The Jepson Manual: Vascular Plants of California.* Second Edition. University of California Press, Berkeley.

17 California Department of Fish and Wildlife, 2019, op. cit.

18 Nelson, J. S., et al., editors, 2004. *A List of Common and Scientific Names of Fishes from the United States, Canada, and Mexico*. Sixth edition. American Fisheries Society Special Publication 20.

19 Crother, B. I., editor, 2012. *Scientific and Standard English Names of Amphibians and Reptiles of North American north of Mexico*. Society for the Study of Amphibians and Reptiles (SSAR) Herpetological Circular 39.

20 American Ornithologists' Union, 1998. *Check-list of North American Birds*. Seventh edition. American Ornithologists' Union, Washington, D.C.

21 Baker, R. J., et al., 2003. *Revised Checklist of North American Mammals North of Mexico*.

(*Bromus diandrus*), soft chess (*B. hordeaceous*), wild oats (Av*ena fatua*), foxtail barley (*Hordeum murinum*), mustard (*Brassica* spp.), red-stemmed storksbill (*Erodium cicutarium*), and wild radish (*Raphanus sativa*).[22]

Wildlife Habitat Values

Most wildlife species that use the project site are generalists that have adapted to human-modified habitats, and individual species that are present at any particular location will vary depending on the vegetation, season, and habitat features in an area. Wildlife observed during LSA's field survey included five bird species: Canada goose (*Branta canadensis*), green heron (*Butorides virescens*), American coot (*Fulica americana*), killdeer (*Charadrius vociferus*), and American crow (*Corvus brachyrhynchos*). During the February 2009 survey, white-tailed kite (*Elanus leucurus*), red-tailed hawk (*Buteo jamaicensis*), and burrowing owl (*Athene cunicularia*) were also observed.

Other common urban-adapted bird species expected to inhabit the project site include northern mockingbird (*Mimus polyglottos*), house finch (*Haemorhous mexicanus*), lesser goldfinch (*Spinus psaltria*), Eurasian collared dove (*Streptopelia decaocto*), mourning dove (*Zenaida macroura*), rock pigeon (*Columba livia*), European starling (*Sturnus vulgaris*), house sparrow (*Passer domesticus*), red-shouldered hawk (*Buteo lineatus*), Anna's hummingbird (*Calypte anna*), black phoebe (*Sayornis nigra*), California scrub-jay (*Aphelocoma californica*), American robin (*Turdus migratorius*), bushtit (*Psaltriparus minimus*), and California towhee (*Melozone crissalis*). Burrowing owl is a California Species of Special Concern (see below) that is closely associated with California ground squirrel burrows (*Otospermophilus beecheyi*). California ground squirrels are known to occur within the City along the edges of fields and banks of the aqueducts and have been observed along the on-site irrigation ditches.

Several amphibian and reptile species may occur at the project site, such as western fence lizard (*Sceloporus occidentalis*) and Pacific tree frog (*Hyliola regilla*).

Mammal species expected to occur at the site include Botta's pocket gopher (*Thomomys bottae*), northern raccoon (*Procyon lotor*), striped skunk (*Mephitis mephitis*), and the aforementioned California ground squirrel.

Special Status Species

For the purposes of this Environmental Checklist, special-status species are defined as follows:

- Species that are listed, formally proposed, or designated as candidates for listing as threatened or endangered under the Federal Endangered Species Act (FESA);

- Species that are listed, or designated as candidates for listing, as rare, threatened, or endangered under the California Endangered Species Act (CESA);

[22] De Novo Planning Group. 2009. Holly Sugar Sports Park Public Draft EIR. August 31.

- Plant species given the California Rare Plant Ranking (CRPR) of 1A, 1B, and 2;[23]
- Animal species designated as Species of Special Concern or Fully Protected by the California Department of Fish and Wildlife (CDFW);[24]
- Species that meet the definition of rare, threatened, or endangered under Section 15380 of the California Environmental Quality Act (CEQA) Guidelines; and
- Taxa considered species of special concern by the relevant local agencies.

Special-Status PlantsNo special-status plant species would occur within ruderal grassland fields at the project site due to the absence of suitable habitat and high levels of disturbance, including agricultural use. Big tarplant (*Blepharizonia plumosa*), which is a CRPR List 1B plant species has been recorded in the vicinity of Tracy, but would not occur at the site due to the aforementioned lack of suitable undisturbed habitat.

Although the irrigation ditches at the project site are largely void of vegetation and likely do not support special-status plants, special-status plants could grow within the irrigation ditches due to the mesic conditions that are present during specific times.[25] These plants include Mason's lilaeopsis (*Lilaeopsis masonii*), Suisun Marsh aster (*Symphyotrichum lentum*), and Delta button celery (*Eryngium racemosum*). The Proposed Project would not impact the ditches since the trails and bridges would completely span the ditches without impacting their banks or channel. If the ditches are altered by the Proposed Project, impacts would be considered potentially significant. Implementation of Mitigation Measure 3.4-2, identified in the 2010 EIR would reduce this potential impact to a less than significant level.

Special-Status AnimalsBased on a review of the CNDDB and other sources identified above, LSA identified the following seven special-status animal species known to occur or potentially occur at or near the project site: western pond turtle (*Emys marmorata*), Swainson's hawk (*Buteo swainsoni*), white-tailed kite, burrowing owl, San Joaquin kit fox (*Vulpes macrotis mutica*), and American badger (*Taxidea taxus*). All of these species, including several other special-status species known to occur in the greater region, are covered under the SJMSCP.

Western Pond Turtle (California Species of Special Concern). Western pond turtles are known to occur in ponds in urban parks and could occur within the ponds and irrigation ditches on or adjacent to the project site. The irrigation ditches do not provide high quality habitat for pond turtles,[26] and the project would not impact the ditches or constructed irrigation pond. Since the western pond turtle is a species covered by the SJMSCP, implementation of Mitigation Measure 3.4-1, identified in

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23 Rare plant rankings assigned by a collaborative group of over 300 botanists in government, academia, non-governmental organizations, and the private sector. This group is sanctioned and jointly managed by the California Department of Fish and Wildlife and the CNPS.

24 California Department of Fish and Wildlife, 2019. *Special Animals List*. California Natural Diversity Database (CNDDB). Periodic publication. 53 pp. August.

25 De Novo Planning Group. 2009. op. cit.

26 De Novo Planning Group. 2009. op. cit.

the 2010 EIR, would reduce potential impacts to western pond turtles, if present, to a less than significant level.

Swainson's Hawk (California State Threatened). Swainson's hawk are known to nest in the City of Tracy with three CNDDB nesting occurrences having been recorded with the City between 1983 and 2016.[27] A Swainson's hawk was observed flying above the project site during the 2009 survey.[28] They nest in large trees, such as pine (*Pinus* spp.), willow (*Salix* spp.), and black walnut (*Juglans* spp.). This raptor could nest in trees within or adjacent to the project site and forage within the on-site fields. Since the Swainson's hawk is a species covered by the SJMSCP, implementation of Mitigation Measure 3.4-1, identified in the 2010 EIR, would reduce potential impacts to this species to a less than significant level.

White-tailed Kite (California Fully Protected). White-tailed kites are known to nest in urban areas (LSA pers. obs.) and could nest in trees within or adjacent to the project site. A white-tailed kite was observed flying above the project site during the 2009 survey.[29] Since the white-tailed kite is a species covered under the SJMSCP, implementation of Mitigation Measure 3.4-1, identified in the 2010 EIR, would reduce potential impacts to this species to a less than significant level.

Burrowing Owl (California Species of Special Concern). Burrowing owls occur in open, well-drained grasslands with abundant small mammal burrows, particularly those of California ground squirrels. Burrowing owls also prefer areas with short vegetation so they can easily scan their surroundings and spot potential predators.[30] In human-modified areas, burrowing owls often use burrows under the edges of concrete, asphalt, rubble piles, and riprap.[31] During the 2009 survey, nine burrowing owls were observed at ground squirrel burrows along the on-site irrigation ditches.[32] These owls were observing at the beginning of the breeding season and could have wintered and/or nested at the site. Although no burrowing owls or owl sign were observed during the 2019 site visit, this species could winter and/or breed within or adjacent to the project site. The Proposed Project would have a potentially significant impact on burrowing owls. Implementation of Mitigation Measure 3.4-1, identified in the 2010 EIR, would reduce the impacts to Swainson's hawk, burrowing owl, and other special-status wildlife species covered under the SJMSCP to a less than significant level.

San Joaquin Kit Fox (Federally Endangered and California State Threatened) and American Badger (California Species of Special Concern). San Joaquin kit fox could occur along the edge of the City and may briefly access the project site. This species is rare in the region, but has been recorded at the Tracy Municipal Airport and along rural roads surrounding the City.[33] American badgers occur in

27 California Department of Fish and Wildlife, 2019. op. cit.
28 De Novo Planning Group. 2009. op. cit.
29 De Novo Planning Group. 2009. op. cit.
30 Zarn, M., 1974. Burrowing owl *(Spetyto cunicularia hypugaea). Habitat Management Series for Unique or Endangered Species*. *Technical Report T-N-250*. Bureau of Land Management, Denver, Colorado.
31 Barclay, J, 2001. *Burrowing Owl Species Summary*. Appendix IV in Colonel Allensworth State Historic Park Final Burrowing Owl Mitigation and Management Plan. Albion Environmental, Inc., Santa Cruz, California. March.
32 De Novo Planning Group. 2009. op. cit.
33 California Department of Fish and Wildlife, 2019. op. cit.

grasslands with abundant prey, such as California ground squirrels, and have been recorded within 2 miles of the site.[34] The project site does not contain high quality habitat for the San Joaquin kit fox or the American badger due to the site's setting, its location within an urban area that is isolated from large tracts of open space habitat, and lack of abundant prey. (Ground squirrels are present along the irrigation ditches, but are not abundant throughout the project site). These two species may briefly forage on or pass through the project site, although the site is not located in an area that would typically be considered a wildlife movement corridor. For these reasons, the 2010 EIR determined that implementation of the 2010 Project would have a less than significant impact on these species. Like the 2010 Project, implementation of the Proposed Project is not anticipated to adversely affect these species. However, since these two mammals are species covered by the SJMSCP, implementation of Mitigation Measure 3.4-1, identified in the 2010 EIR, would reduce potential impacts to these species, if present, to a less than significant level.

Sensitive Natural Communities/Wetlands

Potentially jurisdictional waters of the United States/waters of the State that would be subject to regulation under Section 404 of the Clean Water Act and/or the California Porter-Cologne Water Quality Control Act occur at the project site. Potentially jurisdictional canals/irrigation ditches (some concrete lined and others dirt lined) are present at the site (see Attachment A, Project Description, Figure 3). The ditches are used to capture irrigation and storm drainage runoff from the project site and surrounding properties.[35] The irrigation ditches were largely void of vegetation during the 2009 and 2019 surveys. The lack of vegetation is likely a result of regular maintenance and weed removal. In 2009, the ditches contained wetland characteristics, such as hydrology (e.g., water) and patches of hydrophytic plants.[36] The Proposed Project would not impact these ditches, but in case portions of the ditches are impacted, implementation of Mitigation Measures 3.4-3 and 3.4-4, identified in the 2010 EIR and modified below, would reduce potential impacts to the ditches to less than significant.

No other sensitive communities, such a riparian habitat or sensitive plant communities, are present at the project site.

Wildlife Movement and Nursery Sites

The project site is surrounded by urban development and does not provide a significant wildlife movement corridor. The irrigation ditches may provide a movement corridor for some common wildlife species when water is present, but due to their location within an urban area surrounded by development, the ditches would not be considered a significant wildlife movement corridor. Additionally, the ditches would not be significantly impacted by the project and therefore, wildlife that currently use these features to move through the site would be able to continue to use the ditches. Additionally, the project site does not support any wildlife nursery sites, such as bat roosts or heron rookeries. Like the 2010 Project, implementation of the Proposed Project would have a less than significant impact to wildlife movement corridors and nursery sites. No mitigation is required.

34 Ibid.
35 De Novo Planning Group. 2009. op. cit.
36 De Novo Planning Group. 2009. op. cit.

Local Policies or Ordinances

Chapter 7.08 of the City Municipal Code protects trees and shrubs growing within the City's public right-of-way. The City right-of-way refers to the portion of the public street right-of-way between the curb, or curb line, and the adjacent property line used for the purpose of planting and maintaining City street trees. A permit from the City would be required for the removal of any trees and shrubs within the City right-of-way. Since the Proposed Project would not impact any street trees within the City right-of-way, no permits would be required. Implementation of the Proposed Project would not conflict with any local policies or ordinances. No mitigation is required.

Habitat Conservation Plan

The Proposed Project is subject to the SJMSCP and the project site was mapped as "Unmapped Land Use Project" under the SJMSCP.[37] The project's coverage under the SJMSCP was determined by the San Joaquin Council of Governments (SJCOG) to be consistent with the SJMSCP and the application to include the project site in the SJMSCP was approved by the SJMSCP Board on July 23, 2009, by Minute Resolution Number 09-01.[38] The 2010 Project would not conflict with the SJMSCP or Biological Opinion, and was approved for coverage under the SJMSCP.[39] The approval of coverage by the Joint Powers Authority, issuance of Incidental Take Minimization Measures by the SJCOG, and implementation of Mitigation Measure 3.4-1 identified in the 2010 EIR would ensure that the Proposed Project, like the 2010 Project, would have a less than significant impact related to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Applicable Mitigation

Below are mitigation measures that were included in the 2010 EIR. In some cases, the language of the mitigation measures has been updated or modified as a result of the project, or because specific mitigation measures have already been implemented. Double-underlined text represents language that has been added to the mitigation measure, and text with strikethrough represents language that has been deleted from the mitigation measure. Mitigation Measures 3.4-1 through 3.4-4, previously identified in the 2010 EIR and modified below, would remain applicable to the Proposed Project, as follows:

MM 3.4-1: The City of Tracy shall comply with measures contained within the SJMSCP and shall consult with SJCOG biologists and the TAC prior to any site disturbing activities. The City shall implement the requirements of the SJMSCP to ensure that impacts to western pond turtles, Swainson's hawks, white-tailed kites, burrowing owls, and other species covered under the SJMSCP are avoided. The details of the avoidance measures for these species and nesting birds shall be dictated by the TAC, and may include the following:

- To the extent feasible, construction should be planned to avoid the breeding season of burrowing owl and other nesting birds.

[37] De Novo Planning Group. 2009. op. cit.
[38] Ibid.
[39] Ibid.

- During the non-breeding season (September 1 through January 31), burrowing owls occupying the project site should be evicted from the project site by passive relocation as described in the California Department of Fish and ~~Game~~ Wildlife's (CDF~~G~~W) 2012 Staff Report on Burrowing Owls ~~(Oct., 1995)~~.[40]

- During the breeding season (February 1 through August 31), occupied burrows or active bird nests protected by California Fish and Game Code and/or Migratory Bird Treaty Act shall not be disturbed~~and~~. Burrowing owls shall be provided with a 75-meter protective buffer while other nesting birds will be provided with buffers appropriate for each species. Buffers will be maintained until and unless the TAC, with the concurrence of the Permitting Agencies' representatives on the TAC; or unless a qualified biologist approved by the Permitting Agencies, verifies through non-invasive means that either: 1) the birds have not begun egg laying, or 2) juveniles from the occupied burrows or nests are foraging independently and are capable of independent survival. Once the fledglings are capable of independent survival, the burrow or nest can be destroyed, if needed, or work can proceed within the protective buffer.

Implementation of this mitigation shall occur prior to grading or site clearing activities. The City of Tracy shall be responsible for monitoring and a qualified biologist shall conduct surveys and relocate owls as required.

MM 3.4-2: Prior to any activities that would result in disturbance to the irrigation ditches, the City shall consult with the SJCOG TAC to determine the appropriate mitigation measures that must be implemented to comply with requirements of the SJMSCP and avoid impacts to special-status plant species. If it is determined that the irrigation ditches contain special-status plants that are covered by the SJMSCP, the City shall secure an authorization for an incidental take by remitting all appropriate fees to the San Joaquin Council of Governments and incorporating all Incidental Take Minimization Measures into the project design and construction phase. If it is determined that the irrigation ditches contain special status plants that are not covered by the SJMSCP, the City shall either avoid the project area, or seek consultation with the appropriate regulatory agency (CDFW or USFWS) for the appropriate permits and mitigation measures. If it is determined that the irrigation ditches do not contain special status plants then no additional action is necessary.

Implementation of this mitigation shall occur prior to grading or site clearing activities. The City of Tracy shall be responsible for monitoring and a qualified botanist shall conduct surveys as required.

MM 3.4-3: Prior to any activities that would result in removal, fill, or hydrologic interruption of the irrigation ditches, a formal wetland delineation shall be performed by a qualified

[40] California Department of Fish and Wildlife. 2012. Staff Report on Burrowing Owl Mitigation. State of California, Natural Resources Agency. March 7.

biologist and submitted to the U.S. Army Corps of Engineers (USACE) for verification. If the USACE determines that the irrigation ditches are jurisdictional and that the project activities would result in a fill, the City shall secure an authorization of the fill through the Section 404 permit process with the USACE and a Section 401 permit process with the RWQCB.

MM 3.4-4: Prior to any activities that would result in removal, fill, or hydrologic interruption of the irrigation ditches, the City shall consult with the CDFW to determine if the activities are subject to Section 1601 of the Fish and Game Code. If the CDFW determines that the project activities are subject to these regulations, the City shall secure an authorization of the activities through a Streambed Alteration Agreement.

Conclusion

Based on the above analysis and discussion, no substantive revisions to the 2010 EIR are required, because no new significant impacts or impacts of substantially greater severity than those identified in the 2010 EIR would result from the Proposed Project. With regard to biological resources, the Proposed Project is similar to the 2010 Project and conditions on the project site have not changed considerably since preparation of the 2010 EIR. Therefore, impacts associated with biological resources would be similar to those identified in the 2010 EIR and implementation of Mitigation Measures 3.1-1 through 3.1-4, as modified above to reflect current regulatory requirements, would continue to effectively reduce impacts to biological resources. No additional mitigation is required.

5. CULTURAL RESOURCES

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☐	☒
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒
d. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒

Discussion

As noted in the 2010 EIR, there are no known cultural, historical, or archaeological resources on or within ¼ mile of the project site. Therefore, it is not anticipated that site grading and preparation activities would result in impacts to cultural, historical, or archaeological resources. However, as with most projects in California that involve ground disturbing activities, there is the potential for discovery of a previously unknown cultural and historical resource. Implementation of Mitigation Measure 3.5-1, as identified in the 2010 EIR, would reduce potential impacts to cultural resources or their accidental discovery during construction to less than significant. This mitigation measure would apply to the Proposed Project.

Applicable Mitigation

As described in the 2010 EIR, impacts related to historical and archaeological resources and human remains were determined to be less than significant with implementation of Mitigation Measure 3.5-1. No substantial changes in environmental circumstances have occurred for this topic, nor revisions to the project, nor new information that could not have been known at the time the 2010 EIR was adopted leading to new or more severe significant impacts, and no new mitigation measures are required. Mitigation Measure 3.5-1, previously identified in the 2010 EIR, would remain applicable to the Proposed Project, as follows:

MM 3.5-1: If any prehistoric or historic artifacts, or other indications of archaeological resources are found during grading and construction activities, an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards in prehistoric or historical archaeology, as appropriate, shall be consulted to evaluate the finds and recommend appropriate mitigation measures.

- If cultural resources or Native American resources are identified, every effort shall be made to avoid significant cultural resources, with preservation an important goal. If significant sites cannot feasibly be avoided, appropriate mitigation measures, such as data recovery,

excavations or photographic documentation of buildings, shall be undertaken consistent with applicable state and federal regulations.

- If human remains are discovered, all work shall be halted immediately within 50 meters (165 feet) of the discovery, the County Coroner must be notified, according to Section 5097.98 of the State Public Resources Code and Section 7050.5 of California's Health and Safety Code. If the remains are determined to be Native American, the coroner will notify the Native American Heritage Commission, and the procedures outlined in CEQA Section 15064.5(d) and (e) shall be followed.

- If any fossils are encountered, there shall be no further disturbance of the area surrounding this find until the materials have been evaluated by a qualified paleontologist, and appropriate treatment measures have been identified.

Conclusion

Based on the above analysis and discussion, no substantive revisions to the 2010 EIR are required, because no new significant impacts or impacts of substantially greater severity than those identified in the 2010 EIR would result from the Proposed Project. With regard to cultural resources, the Proposed Project is identical to the 2010 Project and conditions on the project site have not changed considerably since preparation of the 2010 EIR. Therefore, impacts associated with cultural resources would be the same as those identified in the 2010 EIR and implementation of Mitigation Measure 3.5-1 would continue to effectively reduce impacts to cultural resources. No additional mitigation is required.

6. ENERGY

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☐	☒
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

Discussion

Energy Use

The 2010 EIR determined that a variety of resources, including energy, would be irretrievably committed for the 2010 Project's initial construction, infrastructure installation and connection to existing utilities, ongoing buildout (future expansion area), and its continued maintenance.

Additionally, the 2010 EIR determined that a variety of resources would be committed to the ongoing maintenance and life of the 2010 Project. The 2010 EIR identified that fossil fuels are the principal source of energy and the 2010 Project would increase consumption of available supplies, including gasoline. These energy resource demands relate to initial project construction, project operation and site maintenance, and the transport of people and goods to and from the 2010 Project site.

The Proposed Project would provide passive park space including earthen hiking and biking trails, bridges and structural (elevated) walkways, parking area, trailheads, and an interpretive center, as well as tree planting and habitat creation/restoration. Similar to the 2010 Project, the Proposed Project would increase the demand for energy during construction and operation.

Construction of the Proposed Project would require energy for grading and site preparation, collection and off-haul of construction debris, and transportation of construction workers to and from the project site. Petroleum fuels (i.e., diesel and gasoline) would be the primary sources of energy for these activities. Energy usage on the project site during construction would be temporary in nature and would be relatively small in comparison to the State's available energy sources. As such, construction energy impacts are expected to be less than significant.

Operational energy is typically associated with natural gas use, electricity consumption, and fuel used for vehicle trips. Operation of the Proposed Project would not require the consumption of natural gas. Therefore, energy use consumed by the Proposed Project would only be associated with minimal electricity consumption associated with lighting and vehicle trips to the project site. However, the Proposed Project would provide passive park space. In addition, the Proposed Project would be accessible by non-vehicular travel modes and would not result in significant increased traffic volumes.

As such, implementation of the Proposed Project would not result in a long-term substantial demand for electricity and natural gas nor would the Proposed Project require new service connections or construction of new off-site service lines or substations to serve the project site. The nature of proposed improvements would not require substantial amounts of energy for either construction or maintenance purposes. Therefore, implementation of the Proposed Project would not use non-renewable resources in a wasteful or inefficient manner, and this impact would be less than significant.

Conflict or Obstruct a State or Local Plan for Renewable Energy or Energy Efficiency

In 2002, the Legislature passed Senate Bill 1389, which required the California Energy Commission (CEC) to develop an integrated energy plan every two years for electricity, natural gas, and transportation fuels, for the California Energy Policy Report. The plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero emission vehicles and their infrastructure needs, and encouragement of urban designs that reduce vehicle miles traveled (VMT) and accommodate pedestrian and bicycle access.

The CEC recently adopted the 2019 Integrated Energy Policy Report.[41] The 2019 Integrated Energy Policy Report provides the results of the CEC's assessments of a variety of energy issues facing California. Many of these issues will require action if the State is to meet its climate, energy, air quality, and other environmental goals while maintaining energy reliability and controlling costs. The 2019 Integrated Energy Policy Report covers a broad range of topics, including implementation of SB 350, integrated resource planning, distributed energy resources, transportation electrification, solutions to increase resiliency in the electricity sector, energy efficiency, transportation electrification, barriers faced by disadvantaged communities, demand response, transmission and landscape-scale planning, the California Energy Demand Preliminary Forecast, the preliminary transportation energy demand forecast, renewable gas (in response to SB 1383), updates on Southern California electricity reliability, natural gas outlook, and climate adaptation and resiliency.

Energy usage associated with the Proposed Project during construction would be temporary in nature. In addition, energy usage associated with operation of the Proposed Project would be relatively small in comparison to the State's available energy sources and energy impacts would be negligible at the regional level. Because California's energy conservation planning actions are conducted at a regional level, and because the Proposed Project's total impact to regional energy supplies would be minor, implementation of the Proposed Project would not conflict with California's energy conservation plans as described in the CEC's 2019 Integrated Energy Policy Report. Thus, implementation of the Proposed Project would avoid or reduce the inefficient, wasteful, and unnecessary consumption of energy and not result in any irreversible or irretrievable commitments of energy. Impacts would be less than significant.

[41] California Energy Commission, 2019. *2019 Integrated Energy Policy Report.* California Energy Commission. Docket # 19-IEPR-01.

Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to the project, nor new information that could not have been known at the time the 2010 EIR was adopted leading to new or more severe significant impacts, and no mitigation measures are required.

Conclusion

Based on the above analysis and discussion, no substantive revisions to the 2010 EIR are required, because no new significant impacts or impacts of substantially greater severity than those identified in the 2010 EIR would result from the Proposed Project.

7. GEOLOGY AND SOILS

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

Discussion

The following includes a discussion of the potential impacts to geology and soils associated with the Proposed Project compared to the 2010 Project. With respect to geotechnical conditions at the site, these conditions are generally the same. The topography of the Nature Park site has not been modified since adoption of the 2010 EIR. The Proposed Project would be subject to the most recent State and local building and safety codes applicable to the type of construction proposed for the project site, which is the same as the 2010 Project.

Seismicity and Seismic Hazards

The 2010 EIR analyzed the geological, seismic, and soil conditions of the project site and determined that the 2010 Project could expose people and structures to hazards related to strong seismic ground shaking. The Proposed Project is substantially similar in the type of uses and design as the 2010 Project and would be susceptible to the same seismic hazards as identified in the 2010 EIR. Although seismic ground shaking may occur in the project area, the Proposed Project would be designed and constructed consistent with the most current version of the California Building Code

(CBC), as required by the City of Tracy Municipal Code 9.04.030, which includes specifications and design criteria to minimize damage from anticipated ground shaking. Therefore, the Proposed Project would result in a less than significant impact related to increasing the exposure of people or structures to ground shaking compared to existing conditions, and no mitigation is required. As such, the Proposed Project would not result in any new or more significant impacts related to seismic hazards than previously analyzed in the 2010 EIR.

Erosion/Loss of Top Soil

Potential impacts associated with erosion and loss of topsoil were determined to be less than significant with implementation of Mitigation Measure 3.8-2, as identified in the 2010 EIR, (see Section 10, Hydrology and Water Quality of this Environmental Checklist), which would require implementation of various best management practices (BMPs) to reduce the potential for disturbed soils and ground surfaces to result in erosion and sediment discharge into adjacent surface waters during construction activities. Mitigation Measure 3.8-2 would also apply to the Proposed Project. As such, the Proposed Project would not result in any new or more significant impacts related to potential soil erosion than previously analyzed in the 2010 EIR. Refer to Section 10.a, Hydrology and Water Quality of this Environmental Checklist for additional discussion.

Unstable and Expansive Soils

As described in the 2010 EIR, the groundwater levels at the project site are considered relatively high and the project site is underlain by Holocene alluvial and flood basin deposits, and is located within a seismically active area. Therefore, the risk of seismic settlement and liquefaction exist. In addition, the surface and near-surface soils at the project site are variable and contain significant thickness of clays, which possess a medium expansion potential that can develop swelling pressures with increases in soil moisture content.[42]

The Proposed Project would be subject to the same geological, seismic, and soil conditions as those identified in the 2010 EIR. Mitigation Measures 3.6-1 and 3.6-2, as identified in the 2010 EIR, would also apply to the Proposed Project. Implementation of these mitigation measures would reduce potential impacts associated with unstable and expansive soils to a less than significant level. As such, the Proposed Project would not result in any new or more significant impacts related to unstable and expansive soils than previously analyzed in the 2010 EIR.

Septic Tanks/Wastewater Disposal

As with the 2010 Project evaluated in the 2010 EIR, the Proposed Project would not install septic systems or other alternative waste disposal systems on the project site. The Proposed Project would connect to existing sewer infrastructure within the vicinity of the site and there would be no impact related to this topic.

Paleontological Resources

As described in Section 3.3 of the 2010 EIR, no paleontological resources have been identified within the project site, and it is not anticipated that site grading and preparation activities would result in

[42] De Novo Planning Group. 2010. op cit.

impacts to paleontological resources. However, as with most projects in California that involve ground disturbing activities, there is the potential for discovery of a previously unknown resource. Implementation of Mitigation Measure 3.5-1 would reduce potential impacts to paleontological resources or their accidental discovery during construction to less than significant. This mitigation measure would apply to the Proposed Project. As such, with implementation of Mitigation Measure 3.5-1, development of the Proposed Project would not result in new or more severe impacts to paleontological resources than identified in the 2010 EIR.

Applicable Mitigation

Based on the analysis above, no substantial changes in environmental circumstances have occurred for this topic, nor revisions to the project, nor new information that could not have been known at the time the 2010 EIR was adopted leading to new or more severe significant impacts related to geology and soils, and no new or modified mitigation measures are required. Mitigation Measure 3.5-1, previously identified in Section 3.5, Cultural Resources, in the 2010 EIR, would remain applicable to the Proposed Project, as described in Section 5 of this Environmental Checklist. In addition, Mitigation Measures 3.6-1 and 3.6-2, as identified in Section 3.6, Geology and Soils, in the 2010 EIR would also apply to the Proposed Project, as follows:

MM 3.6-1: In accordance with the California Building Code (Title 24, Part 2) Section 18O4A.3 and A.5, and the requirements of Tracy General Plan Objective SA-1.1, Policy 1, liquefaction and seismic settlement potential shall be addressed in the design level geotechnical engineering investigations. The City's Building Division of the Development and Engineering Services Department shall ensure that all the pertinent sections of the California Building Code shall be adhered to in the construction of buildings and stadiums on site, and that all appropriate measures are implemented in order to reduce the risk of liquefaction and seismic settlement prior to the issuance of a Building Permit.

MM 3.6-2: During excavation activities and prior to the placement of fill on the site, a certified geotechnical engineer shall be retained by the City to evaluate subgrade soils for the extent of their expansive potential in areas where buildings or stadium seating are proposed. For areas found to contain soft, potentially expansive clays, the soil shall be removed (i.e., over excavated) and/or stabilized prior to the placement and compaction of fill. Stabilization techniques include, but are not limited to, the placement of 18 inches of ½-inch to ¾-inch crushed rock over stabilization fabric (such as Mirafi 500X or equivalent), placement of larger, angular stabilization rock (1-inch to 3-inch, clean) and use of chemical treatments such as lime to reduce the soil's expansive potential. In addition, building construction alternatives, such as the use of alternative foundation types (i.e., post-tension, piles, etc.) versus end-bearing foundations, shall be considered and implemented where appropriate. Final techniques shall be (a) developed by a certified geotechnical engineer or engineering geologist and (b) reviewed and approved by the City prior to issuance of building permits for each stage of project construction.

Conclusion

Based on the above analysis and discussion, no substantive revisions to the 2010 EIR are required, because no new significant impacts or impacts of substantially greater severity than those identified in the 2010 EIR would result from the Proposed Project. With regard to geology and soils, the Proposed Project is identical to the 2010 Project and conditions on the project site have not changed considerably since preparation of the 2010 EIR. Therefore, impacts associated with geology and soils would be the same as those identified in the 2010 EIR and implementation of Mitigation Measures 3.6-1, 3.6-2, and 3.5-1, would continue to effectively reduce impacts related to geology, soils, and paleontological resources. No additional mitigation is required.

8. GREENHOUSE GAS EMISSIONS

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☐	☒
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

Discussion

Greenhouse gases (GHGs) are present in the atmosphere naturally, and are released by natural sources, or are formed from secondary reactions taking place in the atmosphere. However, over the last 200 years, human activities have caused substantial quantities of GHGs to be released into the atmosphere. These extra emissions are increasing GHG concentrations in the atmosphere, and enhancing the natural greenhouse effect, which is believed to be causing global climate change. The gases that are widely seen as the principal contributors to human-induced global climate change are:

- Carbon dioxide (CO_2)
- Methane (CH_4)
- Nitrous oxide (N_2O)
- Hydrofluorocarbons (HFCs)
- Perfluorocarbons (PFCs)
- Sulfur Hexafluoride (SF_6)

While GHGs produced by human activities include naturally-occurring GHGs such as CO_2, CH_4, and N_2O, some gases, like HFCs, PFCs, and SF_6 are completely new to the atmosphere. Certain other gases, such as water vapor, are short-lived in the atmosphere compared to those GHGs that remain in the atmosphere for significant periods of time, contributing to climate change in the long term. Water vapor is generally excluded from the list of GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation. For the purposes of this analysis, the term “GHGs” will refer collectively to the six gases identified in the bulleted list provided above.

Generate Greenhouse Gas Emissions

As discussed in the 2010 EIR, the major sources of GHG emissions generated from the 2010 Project are vehicle source CO_2 emissions. In addition to vehicle emissions, landscape and field maintenance activities would result in emissions of GHGs. These emissions would primarily come from lawnmowers, aerators, and other gas-fueled equipment. The 2010 EIR estimated that the 2010 Project would result in approximately 1,199.89 metric tons of CO_2e per year. The 2010 EIR identified Mitigation Measure 3.3-4, which requires that as operation of the Holly Sugar Sports Park commences, the City should assess the demand for a route stop by the City-operated Tracer bus system. The 2010 EIR determined that even with implementation of Mitigation Measure 3.3-4, GHG emissions would not be fully eliminated. As such, this impact was considered to be significant and unavoidable.

At the time the 2010 EIR was prepared, no applicable numeric thresholds had yet been defined. Therefore, the GHG analysis associated with the Proposed Project was prepared consistent with CEQA Guidelines §15064.4 to evaluate the impacts of project-related GHG emissions based on the SJVAPCD's *Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Projects under CEQA,*[43] which presents a tiered approach to analyzing project significance with respect to GHG emissions. Project GHG emissions are considered less than significant if they can meet any of the following conditions, evaluated in the order presented:

- Project is exempt from CEQA requirements;
- Project complies with an approved GHG emission reduction plan or GHG mitigation program;
- Project implements Best Performance Standards (BPS); or
- Project demonstrates that specific GHG emissions would be reduced or mitigated by at least 29 percent compared to Business-as-Usual (BAU), including GHG emission reductions achieved since the 2002-2004 baseline period.

Two aspects of the Proposed Project would result in GHG emissions: construction and operation.

Construction GHG Emissions. Construction activities, such as site preparation, site grading, on-site heavy-duty construction vehicles, equipment hauling materials to and from the project site, and motor vehicles transporting the construction crew would produce combustion emissions from various sources. During construction of the Proposed Project, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically uses fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO_2, CH_4, and N_2O. Furthermore, CH_4 is emitted during the fueling of heavy equipment.

[43] San Joaquin Valley Air Pollution Control District, 2009. *Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Projects under CEQA*. December 17. Available online at: www.valleyair.org/Programs/CCAP/12-17-09/3%20CCAP%20-%20FINAL%20LU%20Guidance%20-%20Dec%2017%202009.pdf (accessed March 2020).

Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

The SVJAPCD does not have an adopted threshold of significance for construction-related GHG emissions. However, lead agencies are encouraged to quantify and disclose GHG emissions that would occur during construction. Using CalEEMod, it is estimated that construction of the Proposed Project would generate approximately 4,399.9 metric tons of CO_2e. When considered over the 30-year life of the project, the total amortized construction emissions for the Proposed Project would be 146.7 metric tons of CO_2e per year. Implementation of Mitigation Measures 3.3-1 and 3.3-2 would reduce GHG emissions by reducing the amount of construction vehicle idling and by requiring the use of properly maintained equipment. Therefore, construction impacts associated with GHG emissions would be considered less than significant.

Operational GHG Emissions. Long-term operation of the Proposed Project would generate GHG emissions from area and mobile sources as well as indirect emissions from sources associated with energy consumption. Mobile-source GHG emissions would include vehicle trips associated with trips to the Proposed Project. Area-source emissions would be associated with activities such as landscaping and maintenance on the project site, and other sources. Operational GHG emissions were estimated using CalEEMod and the results are presented in Table 3.

Table 3: Operational GHG Emissions

Emissions Source Category	Operational Emissions (Metric Tons per Year)				
	CO_2	CH_4	N_2O	CO_2e	Percent of Total
Area	<0.1	<0.1	0.0	<0.1	0
Energy	0.8	<0.1	<0.1	0.8	1
Mobile	56.5	0.0	0.0	56.6	49
Waste	1.5	0.1	0.0	3.7	3
Water	53.5	<0.1	<0.1	53.9	47
Total Operational				**115.1**	**100**

Source: LSA (February 2019).

The Proposed Project would generate approximately 115.1 tons of CO_2e per year of emissions, as shown in Table 3. The SJVAPCD has not established a numeric threshold for GHG emissions. The Proposed Project would provide passive park space including earthen hiking and biking trails, bridges and structural (elevated) walkways, parking area, trailheads, and an interpretive center, as well as, tree planting and habitat creation/restoration. Based on the emission estimates shown in Table 3, the Proposed Project would not result in the generation of substantial GHG emissions and would have a less than significant impact related to operational GHG emissions. As identified above, the 2010 EIR required the implementation of Mitigation Measure 3.3-4, which requires that as operation of the Holly Sugar Sports Park commences, the City should assess the demand for a route stop by the City-operated Tracer bus system. With implementation of Mitigation Measure 3.3-4, the Proposed Project would not result in new significant impacts beyond those identified in the 2010 EIR and no new mitigation measures are required.

Consistency with Greenhouse Gas Reduction Plans

The City of Tracy does not have a climate action plan; however the City's Sustainability Action Plan acts as a long-range strategy to achieve sustainability in the sectors of GHG emissions, energy, transportation and land use, solid waste, water, agriculture and open space, biological resources, air quality, public health, and economic development. The Sustainability Action Plan sets forth sustainability measures that aim to achieve the City's sustainability targets. The following measures are applicable to the Proposed Project: T-3: Support for Bicycling; AG-5: Parkland Requirement Increase; BIO-3: Native Landscaping; BIO-7: Sustainable Storm Drainage Design; PH-3: Recreational Programs and Activities; PH-6: Active Recreation in Parks.

As identified above, the Proposed Project would provide passive park space including earthen hiking and biking trails, bridges and structural (elevated) walkways, a parking area, trailheads, and an interpretive center, as well as, tree planting and habitat creation/restoration. As such, the Proposed Project would be consistent with the applicable sustainability measures. In addition, the Proposed Project would not result in a substantial increase in GHG emissions and, therefore, is consistent with the sustainability initiatives. Therefore, the Proposed Project would not conflict with plans, policies, or regulations adopted for the purpose of reducing GHG emissions. This impact would be less than significant.

Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to the project, nor new information that could not have been known at the time the 2010 EIR was adopted leading to new or more severe significant impacts, and no new mitigation measures are required. Mitigation Measure 3.3-4 previously identified in the 2010 EIR, would remain applicable to the Proposed Project, as follows:

MM 3.3-4: As operation of the Holly Sugar Sports Park commences, the City should assess the demand for a route stop by the City-operated Tracer bus system. The demand for such a route stop should continue to be monitored, until such time that a route stop is considered justified. Once a route stop is justified, the City should arrange for the Holly Sugar Sports Park site to be included as a route stop by the City-operated Tracer bus system. The City shall be responsible for monitoring the implementation of this measure.

Conclusion

Based on the above analysis and discussion, no substantive revisions to the 2010 EIR are required, because no new significant impacts or impacts of substantially greater severity than those identified in the 2010 EIR would result from the Proposed Project. With implementation of Mitigation Measure 3.3-4 potential impacts would be less-than-significant and additional mitigation is not required.

9. HAZARDS AND HAZARDOUS MATERIALS

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	☒
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g. Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

Discussion

Transport, Use, Storage, and Disposal of Hazardous Materials

As described in the 2010 EIR, the Phase 1 Environmental Site Assessment (ESA) performed for the 2010 Project revealed no evidence of historical or existing Recognized Environmental Conditions in connection with the project site. Like the 2010 Project, the Proposed Project would result in the transportation, use, disposal, release, emission, or handling of hazardous or acutely hazardous materials, substances, or waste.

The Phase 1 ESA indicated that there are wells located on the project site; however, the City is unaware of any wells located on the site for the proposed Nature Park. Procedures have been established in San Joaquin County for well abandonment to ensure the health and safety of the public. If wells are present on the Nature Park site, compliance with these procedures would ensure that environmental impacts associated with well abandonment activities would be less than significant.

The Phase 1 ESA also recommended soil sampling as a precautionary measure to ensure that there are no persistent pesticide residuals from past agricultural activities. Implementation of Mitigation Measure 3.6-1, as identified in the 2010 EIR, would reduce this potential impact to a less than significant level. Therefore, the Proposed Project would not lead to new or more severe impacts beyond those identified in the 2010 EIR.

Release of Hazardous Materials and Risk of Upset

As described above, the 2010 EIR identified potential impacts related to reasonably foreseeable upset and accident conditions associated with potentially contaminated soil containing pesticide residue during excavation and grading activities at the site. The Proposed Project would use similar construction techniques identified for the 2010 Project and would be subject to the same conditions with respect to hazards. Implementation of Mitigation Measure 3.8-1 identified in the 2010 EIR would ensure that potentially significant impacts associated with the accidental release of hazardous materials into the environment would be reduced to a less than significant level. Therefore, the Proposed Project would not lead to new or more severe impacts beyond those identified in the 2010 EIR.

Emission of Hazardous Materials within 0.25 miles of a School

As identified in the 2010 EIR, the project site is not located within 0.25 miles of an existing school and the 2010 Project would have no impact associated with the emission of hazardous materials within 0.25 miles of an existing school. Likewise, the Proposed Project would not result in any new or more significant impacts associated with the release of hazardous materials within 0.25 miles of an existing school than identified in the 2010 EIR.

Hazardous Materials Site Pursuant to Government Code Section 65962.5

As identified in the 2010 EIR, the project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. However, due to the historical agricultural activities on the site, site soils may contain residual pesticides. Implementation of Mitigation Measure 3.8-1 would reduce potential impacts associated with the release of hazardous materials to a less-than-significant level. Therefore, like the 2010 Project, with implementation of Mitigation Measure 3.8-1, the Proposed Project would not create a significant hazard to the public or the environment as a result of being located on a list of hazardous materials site compiled pursuant to Government Code Section 65962.5.

Aviation Hazards

As identified in the 2010 EIR, the Tracy Municipal Airport is located near the southern boundary of the City limits, over five miles from the project site. The airport overflight and approach zones do not cross the project site, nor are there any airport-related land use or height restrictions that apply to the project site. There are no private airstrips within two miles of the project site. Therefore, like the 2010 Project, the Proposed Project would not result in impacts related to aviation hazards.

Emergency Response or Evacuation Plan

Similar to the 2010 Project, the Proposed Project would not result in the development of structures or alteration of existing roadways that would impede or obstruct emergency response plans or evacuation plans. Further, the Proposed Project would not result in population growth that would increase the demand for emergency services during disasters. Therefore, the Proposed Project, like the 2010 Project, would result in no impact to an emergency response plan or emergency evacuation plan.

Wildland Fires

As described in the 2010 EIR, the California Department of Forestry has designated the western and southern edge of the City as having a moderate wildland fire potential.[44] The project site is located on the northern edge of the City in an area that is largely actively farmed. This area is considered lower risk to wildfires when compared to the hilly area on the south side of the City.

As part of the 2010 Project, the Passive Recreation Area within the southern portion of the project site was proposed to remain in a generally natural state, and would not include ball fields or other grass playing surfaces. The 2010 EIR determined that unmanaged vegetation could pose a risk of wildfires in the proximity of existing residences to the south of the project site and identified Mitigation Measure 3.7-2 to reduce potential impacts related to wildfire on the portion of the project site designated for the Tracy Nature Park.

The Proposed Project would include development of native habitats on the project site, including wetland meadows, drainages, oak woodland, and others. It would also include trails and bridges for passive recreation use and a multi-use perimeter trail for more active recreation (e.g., biking). Proposed improvements would improve access to the project site for emergency responders and increase the active management occurring on the site. As a result, the Proposed Project would not expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires. This impact would be less than significant and Mitigation Measure 3.7-2, as identified in the 2010 EIR would not be required.

Applicable Mitigation

Impacts related to hazards and hazardous materials were determined to be less than significant with implementation of Mitigation Measures 3.7-1 and 3.7-2. As described above, implementation of the Proposed Project would reduce potential impacts associated with wildlfire risk to less than significant; therefore, Mitigation Measure 3.7-2, previously identified in the 2010 EIR would not be required. Mitigation Measure 3.7-1 previously identified in the 2010 EIR, would remain applicable to the Proposed Project, as follows:

MM 3.7-1: All wells located on the project site shall be properly abandoned under the San Joaquin County guidelines if they will not be used any longer. Prior to any grading

[44] Cal Fire, 2007. *San Joaquin County Very High Fire Hazard Severity Zones in LRA.* October 2.

activities, the City shall sample and test the soils for possible persistent pesticide residuals.

Conclusion

Based on the above analysis and discussion, no substantive revisions to the 2010 EIR are required, because no new significant impacts or impacts of substantially greater severity than those identified in the 2010 EIR would result from the Proposed Project. With regard to hazards and hazardous materials, the Proposed Project is similar to the 2010 Project. As described above, improvements proposed as part of the Tracy Nature Park Project would reduce wildfire risks; therefore, risks associated with wildfire risks would be less severe than those identified in the 2010 EIR and Mitigation Measure 3.7-2 would not be required. Implementation of Mitigation Measure 3.7-1, identified in the 2010 EIR, would continue to effectively reduce impacts related to residual pesticides. No additional mitigation is required.

10. HYDROLOGY AND WATER QUALITY

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater?	☐	☐	☐	☒
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site? i. result in substantial erosion or siltation on- or off-site; ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or iv. impede or redirect flood flows?	☐	☐	☐	☒
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Discussion

Water Quality Standards

The 2010 EIR determined that development of the 2010 Project would potentially increase local runoff production, and would introduce constituents into stormwater that are typically associated with urban runoff, including heavy metals, petroleum hydrocarbons, pesticides, and fertilizers. Best management practices (BMPs) would be implemented to limit the concentration of these constituents in any site runoff that is discharged into downstream facilities to acceptable levels. On-site temporary retention basins, as required by Mitigation Measure 3.8-1, would capture all "first flush" runoff generated by the project site and accompanying pollutants. In addition, site construction and maintenance practices would adhere to any and all applicable provisions and ordinances resulting from the City's implementation of their Stormwater Management Program (SWMP) during construction and/or maintenance activities. Mitigation Measures 3.8-2 through 3.8-4 were identified to reduce potential impacts related to pollutants.

Like the 2010 Project, the Proposed Project could potentially increase local runoff runoff production and introduce constituents into stormwater. However, because the majority of the Proposed Project site would remain undeveloped and proposed improvement would largely consist of pervious surfaces, the increase in impervious surface coverage would be minimal. As described in Attachment A, Project Description, the Proposed Project would include the establishment of filtration swales along the northern site boundary to treat runoff from Legacy Fields prior to entering ecological areas within the site. Further, the Proposed Project would be required to comply with regulatory requirements, including the City of Tracy Municipal Code and the State Water Resources Control Board's General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activity (Construction General Permit). Mitigation Measures 3.8-2 and 3.8-3 would apply to the Proposed Project and would ensure that potential impacts of the Proposed Project are less than significant with respect to construction- and operation-period water quality. Mitigation Measure 3.8-4, which requires continual maintenance of impervious areas, including parking lots and paved areas would not apply to the Proposed Project, as the Proposed Project includes few, if any of these surfaces.

Deplete Groundwater Supplies

The 2010 EIR determined that impacts to groundwater supplies or groundwater recharge associated with the 2010 Project would be less than significant. Like the 2010 Project, the Proposed Project would include limited areas of impervious surfaces (e.g., interpretive center, restroom facility). Most of the proposed improvements, including the trails and parking area would be pervious. In addition, the majority of the Tracy Nature Park site would be covered with native/non-native vegetation and trees, which would not interfere with groundwater recharge. Given the relatively large size of the groundwater basin in the Tracy area, the areas of impervious surfaces added as a result of the Proposed Project would not adversely affect the recharge capabilities of the local groundwater basin.

As described in the 2010 EIR, the primary water demand for the 2010 Project would be turf and landscape irrigation, which would be met using non-potable water supplies. Estimated total potable water demand for the 2010 Project is 47 acre-feet/year (af/yr), which would be met using potable water supplies from the City's water system and included the following uses:

- Concession and restroom buildings at the active sports park;
- Restroom building in the passive recreation area; and
- Future recreation center and library, concession and restroom buildings, and children's' "spray park" in the future expansion area to the northwest of the Nature Park site.

Based on the analysis conducted for the 2010 EIR, the City's existing and additional potable water supplies are sufficient to meet the City's existing and projected future potable water demands, including the potable water demands associated with the 2010 Project under all hydrologic conditions. Therefore, the 2010 EIR determined that the demand for potable and non-potable water supplies to serve the 2010 Project would not result in additional groundwater pumping.

Like the 2010 Project, the Proposed Project would require limited potable water supply to serve the proposed restroom facility and interpretive center. A restroom facility in this area of the project site was assumed as part of the water supply assessment conducted for the 2010 Project, and the proposed interpretive center would result in limited water demand. Therefore, the Proposed Project would have a less than significant impact on groundwater supplies and resources. No mitigation is required.

Drainage Pattern and Surface Run-off

The 2010 EIR determined that the 86-acre passive recreation area in the southern portion of the project site would not result in the introduction of impervious surfaces, and drainage and stormwater runoff would not change within this area a result of project implementation. Other portions of the 2010 Project (e.g., active sports park, expansion area) would result in impervious surfaces, which would increase stormwater generation. Mitigation Measure 3.8-1, which requires on-site stormwater detention, was identified to reduce stormwater and drainage runoff rates and associated impacts to a less-than-significant level.

Similar to the 2010 Project, the Proposed Project would not alter the course of a stream or river within the project site. Existing irrigation canals and ponds on the project site would remain and additional drainage areas would be created. The Proposed Project would create some new impervious surfaces associated with the proposed restroom facility and interpretive center; however, the majority of the site would remain pervious, and changes to stormwater runoff would be minimal. However, as the 2010 Project did not propose any impervious surfaces as part of the passive recreation area, the Proposed Project would result in a slight increase in stormwater runoff in this portion of the 2010 Project Site. The Proposed Project would be designed to capture and filter stormwater runoff on-site, including some of the stormwater generated from the active sports fields. In addition, Mitigation Measure 3.8-1, as identified in the 2010 EIR, which requires preparation and implementation of a site drainage and stormwater detention plan, would apply to the Proposed Project and would ensure that any stormwater runoff generated by the Proposed Project would be captured, retained, and filtered on-site.

Flood Hazard, Tsunami, Seiche Zones

As described in the 2010 EIR, the project site is located within flood zone AE at an elevation of approximately 11 feet (based upon FEMA FIRM Map No. FM0602990570C). The existing ground elevations at the site, based upon USGS mapping, are approximately 4 to 5 feet. During significant rainfall events, it is anticipated that the project site will become inundated with surface water flows.

The 2010 EIR determined that flood-related impacts to the 86-acre passive recreation area would be less than significant because this area would not include any structures or facilities that may be damaged during a flood event. Impacts to permanent and temporary structures proposed for the active sports park site were determined to be potentially significant and Mitigation Measure 3.8-5 was identified to reduce potential impacts to a less than significant level.

Like the 2010 Project, the majority of the ground cover within the 86-acre Tracy Nature Park site would consist of native vegetation, parking areas, trails, and drainage areas. During a significant storm event, these areas may become inundated with surface water; however, due to the lack of

structures within these areas, water flows would not be significantly impeded or redirected, and these surfaces would not experience significant damage because of water inundation. However, the proposed Interpretive Nature Center may experience water damage during a flood event if it is not elevated above 100-year flood plain levels. Implementation of Mitigation Measure 3.8-5, as identified in the 2010 EIR would reduce this impact to a less than significant level. With implementation of Mitigation Measure 3.8-5, the Proposed Project would not result in any new or more severe impacts than those identified in the 2010 EIR.

The 2010 EIR determined that the project site would not be subject to any hazards associated with seiches, extreme high tides, or tsunamis. Therefore, similar to the 2010 Project, the Proposed Project would not expose people or structures to inundation by seiche, tsunami, or mudflow.

Conflict with Water Quality Control Plan or Sustainable Groundwater Management Plan

As discussed above, due to its size, construction and operation of the project would be subject to State and regional requirements related to stormwater runoff. Required compliance with State and local regulations regarding stormwater during construction and operation would ensure that the Proposed Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. As a result, this impact would be less than significant.

Applicable Mitigation

Impacts related to hydrology and water quality were determined to be less than significant with implementation of Mitigation Measures 3.8-1 through 3.8-5. No substantial changes in environmental circumstances have occurred for this topic, nor revisions to the project, nor new information that could not have been known at the time the 2010 EIR was adopted leading to new or more severe significant impacts, and no new mitigation measures are required. As described above, implementation of the Proposed Project would not generate significant amounts of impervious surfaces, such as parking and paved areas; therefore, Mitigation Measure 3.8-4, previously identified in the 2010 EIR would not be required. Mitigation Measures 3.8-1, 3.8-2, 3.8-3 and 3.8-5 previously identified in the 2010 EIR, would remain applicable to the Proposed Project, as follows:

MM 3.8-1: Prior to ground disturbing activities, the City of Tracy shall prepare a detailed site drainage and stormwater detention plan. The Plan shall include calculations regarding the anticipated volume of stormwater runoff generated by the project, and shall include plans for the retention/detention of stormwater runoff on the project site. Calculations shall be consistent with the current version of the City's Manual of Stormwater Quality Control Standards for New Development and Redevelopment. The stormwater detention facilities shall be designed with adequate capacity to ensure that that stormwater generated on the project site during a peak storm event is retained at a rate that will ensure that discharges from the site do not exceed pre-construction levels. All detention facilities shall be developed in conformance with the City's standards, including the standards identified in the City's Manual of Stormwater Quality Control Standards for New Development and Redevelopment. The Plans and Specifications of the proposed

retention facilities should meet the standards of the City of Tracy Development and Engineering Services Department as an adequate engineering product.

The construction of stormwater detention facilities may be phased to correspond with development of the project site over time, provided that adequate detention is provided at all times to ensure that runoff from the site does not exceed pre-construction levels.

MM 3.8-2: **Construction:** The City shall ensure that the development of the project site shall incorporate the construction of one or more on-site retention basins to capture site runoff in conformance with City Design Standards as described in MM 3.8-1. In addition, site construction and maintenance practices shall adhere to any and all applicable provisions and ordinances resulting from the City's implementation of its SWMP, to the extent to which they exist at the time of construction and/or maintenance activities. The following list is intended as an outline summary and the City may impose additional requirements:

Non-Structural BMPs

- Minimizing Disturbance
- Preserving Natural Vegetation (where possible)
- Good Housekeeping, e.g., daily clean-up of construction site

Structural BMPs Erosion Controls

- Mulch
- Grass
- Stockpile Covers Sediment Controls
- Silt Fence
- Inlet Protection
- Check Dams
- Stabilized Construction Entrances
- Sediment Traps

MM 3.8-3: **Post-Construction:** The project shall prepare a Storm Water Pollution Prevention Plan (SWPPP) that includes specific types and sources of stormwater pollutants, determine the location and nature of potential impacts, and specify appropriate control measures to eliminate any potentially significant impacts on receiving water

quality from stormwater runoff. The SWPPP shall require treatment BMPs that incorporate, at a minimum, the required hydraulic sizing design criteria for volume and flow to treat projected stormwater runoff. The SWPPP shall comply with the most current standards established by the Central Valley RWQCB. Best Management Practices shall be selected from the City's Manual of Stormwater Quality Control Standards for New Development and Redevelopment according to site requirements and shall be subject to approval by the City Engineer and Central Valley RWQCB. At least 85 to 90 percent of annual average stormwater runoff from the site shall be treated per the standards in the 1003 California Stormwater Best Management Practice New Development and Redevelopment Handbook. Drainage from all paved surfaces, including streets, parking lots, driveways, and roofs shall be routed either through swales, buffer strips, or sand filters or treated with a filtering system prior to discharge to the storm drain system. Landscaping shall be designed to effect some treatment, along with the use of a Stormwater Management filter to permanently sequester hydrocarbons, if necessary. Roofs shall be designed with down spouting into landscaped areas, bubbleups, or trenches. Driveways shall be curbed into landscaping so runoff drains first into the landscaping. Permeable pavers and pavement shall be utilized to construct the facilities, where appropriate.

MM 3.8-5: Design of the project shall be consistent with the requirements of Chapter 9.52, Floodplain Regulations, of the Municipal Ordinance. Project design is anticipated to include the following: All structures are required to be one foot above the base flood as determined by the appropriate FEMA FIRM Map. Soils suitable for building pad construction (as determined by a qualified engineer), shall be imported to the project site as-needed in order to ensure that all building and structure pads are elevated to levels necessary to meet City requirements.

Conclusion

Based on the above analysis and discussion, no substantive revisions to the 2010 EIR are required, because no new significant impacts or impacts of substantially greater severity than those identified in the 2010 EIR would result from the Proposed Project. With regard to hydrology and water quality, the Proposed Project is identical to the 2010 Project and conditions on the project site have not changed considerably since preparation of the 2010 EIR. Therefore, impacts associated with hydrology and water quality would be the same as those identified in the 2010 EIR and compliance with applicable State and local regulations during construction and operation, as well as, implementation of Mitigation Measures 3.8-1, 3.8-2, 3.8-3, and 3.8-5, would continue to effectively reduce impacts related to hydrology and water quality. No additional mitigation is required.

11. LAND USE AND PLANNING

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
b. Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

Discussion

Divide an Established Community

Projects that have the potential to physically divide an established community include projects such as new freeways and highways, major arterials, streets, and railroad lines. The Proposed Project would result in the development of a nature park on an existing undeveloped parcel just south of the existing Legacy Sports Fields Complex. The Proposed Project would not result in a barrier within the project site that would impede access, nor would it result in a removal of a major means of access. The Proposed Project would provide trail connections to adjacent areas that would enhance connectivity of the site to established community centers (e.g., Legacy Sports Fields Complex, Larch Clover community). Therefore, the Proposed Project would not inhibit public connectivity, and would not physically divide an established community. Therefore, this impact would not result in new or more significant impacts beyond those analyzed in the 2010 EIR.

Conformance with Land Use Plans

The 2010 Project included annexation of the project site into the City of Tracy, a General Plan Amendment (GPA) to designate the site as Parks (P), a zoning ordinance amendment to create a Park (P) zone district, and prezoning of the project site to Park (P) to accommodate the 2010 Project. The Proposed Project is consistent with the type and intensity of development allowed within the Parks land use designation. The Proposed Project would not require changes to General Plan land use designations or zoning districts.

Applicable Mitigation

Impacts related to land use were determined to be less than significant and no mitigation measures were identified.

Conclusion

Based on the above analysis and discussion, no substantive revisions to the 2010 EIR are required, because no new significant impacts or impacts of substantially greater severity than those identified in the 2010 EIR would result from the Proposed Project. As described above, as part of the 2010 Project approvals, the City of Tracy amended the General Plan land use designation for the project site and approved a prezoning for the project site. The Proposed Project is consistent with the type

and intensity of development allowed in the City's General Plan and Zoning Ordinance. Therefore, impacts associated with land use and planning would be less than significant and no mitigation is required.

12. MINERAL RESOURCES

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Discussion

As described in the 2010 EIR, the main mineral resources found in the Tracy Planning Area are sand and gravel (aggregate), which are primarily used for construction materials like asphalt and concrete. The project is located within a designated as Mineral Resource Zone (MRZ). This area is designated as MRZ-1, an area where adequate information indicates that no significant mineral deposits are present. Like the 2010 Project, the Proposed Project would not result in the loss of availability of a known mineral resource, nor would it preclude the ability to extract these resources in the future. The Proposed Project would have no impact on mineral resources.

Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to the project, nor new information that could not have been known at the time the 2010 EIR was adopted leading to new or more severe significant impacts, and no new mitigation measures are required.

Conclusion

Based on the above analysis and discussion, no substantive revisions to the 2010 EIR are required, because no new significant impacts or impacts of substantially greater severity than those identified in the 2010 EIR would result from the Proposed Project. Like the 2010 Project, the Proposed Project would have no impact on mineral resources and no mitigation would be required.

13. NOISE

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☐	☒
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒
c. For a project located within the vicinity of a private airstrip an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Discussion

The ambient noise conditions within and in the vicinity of the project site have not changed substantially since the preparation of the 2010 EIR. As discussed in the 2010 EIR, the project site would be exposed to traffic noise generated on area roadways. Based on ambient noise monitoring results in the 2010 EIR, noise levels at the project site range from 51.9 to 64.4 dBA L_{eq} and 56.1 to 80.4 dBA L_{max}. Regulatory requirements and standards that govern the generation of and exposure to noise within the community have not changed since certification of the 2010 EIR. Potential impacts of the Proposed Project as compared to the 2010 Project with respect to noise are discussed below.

Construction-Period Impacts

Noise generated by the construction period for the Proposed Project would temporarily increase noise levels in the vicinity of the project site. Each stage of construction would involve a different mix of operating equipment, and noise levels would vary based on the amount and types of equipment in operation and the location of the activity. These activities would be similar to the 2010 Project.

As discussed in the 2010 EIR, average noise levels associated with construction activities typically range from approximately 76 dBA to 84 dBA L_{eq}, with intermittent individual equipment noise levels ranging from approximately 74 dBA to more than 88 dBA for brief periods at 50 feet from the source. As identified in the 2010 EIR, with regard to residential land uses, noise levels associated with construction activities occurring during the more noise-sensitive nighttime hours (i.e., 10:00 p.m. to 7:00 a.m.) are of increased concern. The 2010 EIR determined that the 2010 Project does not include restrictions on the hours during which construction activities would occur. As a result, the 2010 EIR found that construction activities occurring during the more noise-sensitive nighttime hours could result in increased levels of annoyance and potential sleep disruption for occupants of

nearby residential land uses. As such, short-term noise-generating construction activities associated with the 2010 Project would be considered to have a potentially significant impact. The 2010 EIR identified Mitigation Measure 3.10-1, which would ensure noise-generating construction activities would comply with the City's Municipal Code and General Plan requirements and would be considered less than significant.

Construction noise associated with the Proposed Project would be similar to what was evaluated in the 2010 EIR. As such, implementation of Mitigation Measure 3.10-1 as identified in the 2010 EIR would sufficiently reduce project-related construction noise impacts to a less-than-significant level to comply with the City's Municipal Code and General Plan requirements. With implementation of Mitigation Measure 3.10-1, the Proposed Project would not result in new significant impacts beyond those identified in the 2010 EIR and no new mitigation measures are required.

Long-Term Operational Noise Impacts

The 2010 EIR identified that the 2010 Project would include a 166-acre active sports park, which may ultimately include up to 14 soccer fields, 18 baseball fields, five softball fields, four football fields, and one football/soccer stadium. In addition, the 2010 Project would include up to four children's play areas, restroom facilities, concession facilities, bleachers, and parking areas. Noise generated by the 2010 Project would be primarily associated with the use of on-site recreational facilities (i.e., stadium, ball fields, and play areas), vehicle parking areas, and landscape maintenance activities.

The 2010 EIR found that recreational uses associated with the 2010 Project, including the proposed stadium, baseball, and softball facilities would result in significant increases in ambient noise levels at nearby noise-sensitive land uses that could exceed the City's noise standard of 55 dBA L_{eq}. In addition, the 2010 EIR found that depending on final site design, the proposed skate park, BMX track, paintball course, and ball fields developed as part of the future expansion area could also result in significant increases in ambient noise levels at nearby noise-sensitive land uses, particularly if multiple events were to occur simultaneously, and could also exceed the City's noise standard of 55 dBA L_{eq}. In addition to recreational uses, landscape maintenance activities occurring throughout the project area could also result in a significant increase in ambient noise levels at nearby noise-sensitive land uses. For these reasons, the 2010 EIR found that noise generated by the 2010 Project would be considered to have a potentially significant impact. The 2010 EIR identified Mitigation Measure 3.10-2; however, the 2010 EIR determined that impacts would be significant and unavoidable.

The Proposed Project would provide passive park space including earthen hiking and biking trails, bridges and structural (elevated) walkways, a parking area, trailheads, and an interpretive center, as well as, tree planting and habitat creation/restoration. As such, the Proposed Project would be expected to generate much lower noise levels than the 2010 Project. Operational noise levels associated with the Proposed Project would primarily be generated from parking lot activities at the parking area and landscape maintenance activities.

As identified in the 2010 EIR, noise levels commonly associated with vehicle parking areas are often associated with the starting of vehicles, the opening and closing of vehicle doors, playing of

amplified music, and the occasional sound of vehicle alarms and horns, which can reach intermittent levels of approximately 92 dBA L_{eq} at 50 feet. The closest sensitive receptors to the parking areas include the single-family residences located approximately 120 feet south the parking area at the Interpretive Community Center. Based on distance attenuation, at 120 feet, there would be a decrease of approximately 7.6 dBA from the reduced distance compared to the noise reference level measured at 50 feet. Therefore, based on distance attenuation, the closest receptor may be subject to parking lot noise levels of approximately 84.4 dBA L_{eq}, which would be above the City's noise standard of 55 dBA L_{eq}. However, a parking lot currently exists at this location. Although would be a slight increase in vehicle trips and, therefore, a slight increase in use of the parking lot, parking lot activities would not cause an increase in noise levels of more than 3 dBA. Therefore, it is not expected that the Proposed Project would substantially increase noise levels over existing conditions, and impacts would be less than significant. Operation of the Proposed Project would not result in new or more severe impacts related to operational noise than identified in the 2010 EIR.

Implementation of the Proposed Project would result in landscape maintenance activities. As discussed in the 2010 EIR, noise levels at the nearest residential land use could reach levels of approximately 75 dBA L_{eq}. Landscape maintenance activities occurring during the more noise-sensitive nighttime hours could result in increased levels of annoyance and potential sleep disruption to occupants of nearby residential land uses. Landscape maintenance noise associated with the Proposed Project would be similar to what was evaluated in the 2010 EIR. As such, implementation of Mitigation Measure 3.10-2, as identified in the 2010 EIR, would provide restrictions on hours of use for on-site exterior recreational facilities and landscape maintenance activities would reduce potential levels of annoyance and activity interference at nearby noise-sensitive land uses. With implementation of Mitigation Measure 3.10-2, the Proposed Project would not result in new significant impacts beyond those identified in the 2010 EIR and no new mitigation measures are required.

In addition, pedestrians or bicyclists may converse resulting in intermittent noise while using the trails; however, this noise level would be similar to existing conditions and would not generate noise levels that would exceed the applicable standards. Therefore, the Proposed Project would not result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance. With implementation of Mitigation Measure 3.10-2, the Proposed Project would not result in new significant impacts beyond those identified in the 2010 EIR and no new mitigation measures are required.

Long-Term Traffic Noise Impacts

Motor vehicles with their distinctive noise characteristics are the dominant noise source in the project vicinity. The amount of noise varies according to many factors, such as volume of traffic, vehicle mix (percentage of cars and trucks), average traffic speed, and distance from the observer. Implementation of the proposed project would result in new daily trips on local roadways in the project site vicinity. A characteristic of sound is that a doubling of a noise source is required in order to result in a perceptible (3 dBA or greater) increase in the resulting noise level.

The 2010 EIR determined that implementation of the 2010 Project would result in increased traffic volumes on some area roadways. The 2010 EIR found that during weekday operations,

implementation of the 2010 Project would not result in a significant increase (i.e., 3 dBA or greater) in traffic noise levels. However, the 2010 EIR also found that during Saturday traffic conditions, implementation of the 2010 Project would result in increased traffic noise levels of up to approximately 8 dBA CNEL. Significant increases in traffic noise levels would be projected to occur along Corral Hollow Road, north of Larch Road; Larch Road, between Corral Hollow Road and N. Tracy Boulevard; as well as, portions of N. Tracy Boulevard to the north and south of Larch Road. Predicted noise levels at residential land uses located adjacent to N. Tracy Boulevard would exceed the City of Tracy's General Plan noise criteria of 60 dBA CNEL for land use compatibility. As a result, predicted increases in traffic noise levels associated with the 2010 Project would be considered significant and unavoidable.

As identified in Section 17, Transportation, the Proposed Project is estimated to generate 67 daily trips. As such, it is expected that the Proposed Project would only represent a small increase in noise levels and would not result in a perceptible noise increase along any roadway segment in the project vicinity and therefore, would be less than significant. Therefore, implementation of the Proposed Project would not result in new or more severe impacts related to traffic noise than identified in the 2010 EIR.

Vibration Impacts

The 2010 EIR found that no major stationary sources of groundborne vibration were identified in the project area that would result in the long-term exposure of proposed on-site land uses to unacceptable levels of ground vibration. In addition, the 2010 EIR found that the 2010 Project would not involve the use of any major equipment or processes that would result in potentially significant levels of ground vibration that would exceed these standards at nearby existing land uses. However, the 2010 EIR found that construction activities associated with the 2010 Project would require the use of various tractors, trucks, and jackhammers that could result in intermittent increases in groundborne vibration levels. However, predicted vibration levels would not be anticipated to exceed recommended criteria for structural damage and human annoyance (0.2 and 0.1 in/sec ppv, respectively) at nearby land uses. As a result, short-term groundborne vibration impacts were considered less than significant and no mitigation was required. Vibration impacts associated with the Proposed Project would be similar to what was evaluated in the 2010 EIR. As such, the Proposed Project would not result in new significant impacts beyond those identified in the 2010 EIR and no new mitigation measures are required.

Aircraft Noise Source Impacts

As stated in the 2010 EIR, the nearest airport/airstrip is the Tracy Municipal Airport, which is located approximately 4 miles south of the project site. Like the 2010 Project, implementation of the Proposed Project would not affect airport operations, nor would implementation of the Proposed Project result in the development or relocation of any noise-sensitive land uses within two miles of any airport or airstrip. As a result, implementation of the Proposed Project would not result in increased exposure of individuals to excessive aircraft noise levels associated with the existing airport. Therefore, noise impacts associated with existing airports/airstrips would be less than significant and no mitigation is required.

Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to the project, nor new information that could not have been known at the time the 2010 EIR was adopted leading to new or more severe significant impacts, and no new mitigation measures are required. Mitigation Measure 3.10-1, previously identified in the 2010 EIR, would remain applicable to the Proposed Project, as follows:

MM 3.10-1: The following mitigation measures shall be implemented:

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

MM 3.10-2: The following mitigation measures shall be implemented:

- Prior to the issuance of an electrical permit for an public address systems proposed for playing fields within the project site, the City of Tracy shall test the sound system to ensure that it does not generate noise levels in excess of 75dB L_{eq} at the property lines.
- On-site exterior recreational activities shall be limited to between the hours of 7:00 a.m. and 10:00 p.m.
- Landscape maintenance activities shall be limited to between the hours of 7:00 a.m. and 10:00 p.m., Monday through Saturday. Landscape maintenance activities shall be prohibited on Sundays and federal holidays.

In addition, the 2010 EIR identified Mitigation Measure 3.10-5 which includes measures for proposed noise sensitive land uses, such as a library. This measure would not apply to the Proposed Project as the Proposed Project would not include new noise-sensitive land uses.

Conclusion

Based on the above analysis and discussion, no substantive revisions to the 2010 EIR are required, because no new significant impacts or impacts of substantially greater severity than those identified in the 2010 EIR would result from the Proposed Project. With implementation of Mitigation Measures 3.10-1 and 3.10-2 potential impacts would be less-than-significant and additional mitigation is not required.

14. POPULATION AND HOUSING

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Discussion

No impacts to population and housing were identified in the 2010 EIR. Similar to the 2010 Project, the Proposed Project would not induce substantial growth, displace any existing housing units or people, and would not necessitate the construction of replacement housing elsewhere. No new impact or increase in the severity of impacts would occur.

Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to the project, nor new information that could not have been known at the time the 2010 EIR was adopted leading to new or more severe significant impacts, and no new mitigation measures are required.

Conclusion

The 2010 EIR adequately evaluated the potential population and housing impacts of the proposed project. Therefore, potential impacts would be less-than-significant and mitigation is not required.

15. PUBLIC SERVICES

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire protection?	☐	☐	☐	☒
ii. Police protection?	☐	☐	☐	☒
iii. Schools?	☐	☐	☐	☒
iv. Parks?	☐	☐	☐	☒
v. Other public facilities?	☐	☐	☐	☒

Discussion

The 2010 EIR determined that implementation of the 2010 Project would not adversely impact existing fire and emergency services within the City and would not require the construction of new fire protection facilities. Mitigation Measure 3.11-1 was identified to ensure that adequate on-site hydrants with adequate fire-flow pressure would be installed as part of the 2010 Project. Like the 2010 Project, the Proposed Project would construct a limited number of structures that would be at risk for fire, would not increase the demand for fire protection services, and would not impact the City's service levels or capabilities.

Like the 2010 Project, the Proposed Project would not result in significant new demand for police services nor would implementation of the Proposed Project require the construction of new police facilities to serve the project site or result in impacts to the existing response times and existing police protection service levels. This impact would be less than significant and no mitigation is required.

Like the 2010 Project, the Proposed Project would not result in population growth in the City of Tracy. Since the project would not result in population growth, implementation of the project would not result in increased enrollment in area schools, which could lead to impacts. Additionally, the project would increase the availability of park and recreation resources within the City of Tracy, which would reduce the strain that existing park users and residents are currently placing on existing facilities. Therefore, impacts to schools, parks, and other public facilities would be less than significant.

Applicable Mitigation

Impacts related to public service were determined to be less than significant with implementation of Mitigation Measure 3.11-1. No substantial changes in environmental circumstances have occurred

for this topic, nor revisions to the project, nor new information that could not have been known at the time the 2010 EIR was adopted leading to new or more severe significant impacts, and no new mitigation measures are required. To ensure adequate fire hydrant capacity is provided, Mitigation Measure 3.11-1, previously identified in the 2010 EIR, would remain applicable to the Proposed Project, as follows:

MM 3.11-1: Prior to City approval of the final infrastructure plans and construction documents for the Holly Sugar Sports Park, the City shall include the location and specifications of all fire hydrants, to the satisfaction of the Tracy Fire Department. The final infrastructure plans and construction documents for the project shall include hydrants with adequate fire-flow that are spaced appropriately throughout the project site, to the satisfaction of the Tracy Fire Department.

Conclusion

Based on the above analysis and discussion, no substantive revisions to the 2010 EIR are required, because no new significant impacts or impacts of substantially greater severity than those identified in the 2010 EIR would result from the Proposed Project. As described above, potential impacts to public services are considered less-than-significant and no mitigation is required.

16. RECREATION

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Discussion

The 2010 EIR determined that recreation impacts would be less than significant. Similar to the 2010 Project, the Proposed Project would not increase the use of existing recreational facilities, nor would it create a need for additional recreation services. The Proposed Project would have a beneficial impact to existing recreational facilities, as use at other existing neighborhood and regional parks or other recreational facilities may be reduced. No new impacts or increase in the severity of impacts would occur.

Applicable Mitigation

Impacts related to recreation were determined to be less than significant and no mitigation measures were identified.

Conclusion

Based on the above analysis and discussion, no substantive revisions to the 2010 EIR are required, because no new significant impacts or impacts of substantially greater severity than those identified in the 2010 EIR would result from the Proposed Project. As described above, the Proposed Project, like the 2010 Project, would provide additional recreation resources to serve the City of Tracy. Therefore, potential impacts to recreation are considered less-than-significant and no mitigation is required.

17. TRANSPORTATION

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	☒
b. Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	☐	☐	☐	☒
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d. Result in inadequate emergency access?	☐	☐	☐	☒

Discussion

Conflict with a Program, Plan, Ordinance or Policy Addressing the Circulation System

Transit. As described in the 2010 EIR, there is no public transit system that serves the project site. The closest transit routes are the local fixed-route bus service and local commuter-route bus services operated by the City of Tracy (Tracer). These services run along Corral Hollow Road and Tracy Boulevard south of the project site. The expected increase in passenger demand associated with implementation of the Proposed Project is not projected to exceed available transit capacity. Therefore, impacts on transit facilities would be less than significant.

Bicyclists and Pedestrians. As described in the 2010 EIR, pedestrian and bicycle facilities were non-existent in the areas adjacent to the project site and the 2010 Project did not include pedestrian or bicycle facilities along the project site frontage on Tracy Boulevard and Corral Hollow Road, making it difficult to access the project site from neighborhoods to the south. Therefore, the 2010 EIR determined that impacts to bicyclists and pedestrians would be significant and identified Mitigation Measure 3.12-14, which requires provision of bicycle and pedestrian facilities along Tracy Boulevard and Corral Hollow Road to reduce potential impacts to less than significant.

Unlike the 2010 Project, implementation of the Proposed Project would include development of a passive trail system throughout the site, with a more active multi-use trail proposed around the site perimeter. As described in Attachment A, Project Description, trails would connect offsite to future expansion of Lincoln Boulevard to the south and north to the "Old River." In addition, Mitigation Measure 3.12-14 would continue to apply to the Proposed Project to ensure that adequate pedestrian and bicycle facilities are provided along the frontage roads around the project site. With implementation of Mitigation Measure 3.12-14, impacts to bicyclists and pedestrians would be less than significant.

Roadways and Freeways. In the 2010 EIR, the 86-acre project site was proposed to provide passive park space. The Proposed Project would result in use of the 86 acres as a nature park including

earthen hiking and biking trails, bridges and structural (elevated) walkways, a parking area, trailheads, and an interpretive center, as well as tree planting and habitat creation/ restoration.

The 2010 EIR analyzed the project's traffic impacts according to the effects on vehicular level of service (LOS). LSA considered whether the change in use from passive park to nature park would have the potential to result in more severe impacts to LOS than disclosed in the 2010 EIR. Active park elements such as sports fields generate traffic at a higher rate than park open space and the Institute of Transportation Engineers (ITE) *Trip Generation Manual*, Tenth Edition (2017) provides trip generation rates for many types of active park uses. The ITE *Trip Generation Manual* does not distinguish between park open space uses such as passive park space or nature park space. Based on LSA's experience analyzing many different park projects, the trip generation potential of passive park space and nature park space is likely similar. In addition, the 2010 EIR analyzed the LOS impacts of the entire Legacy Fields Sports Complex including high trip generation active park elements. The potential traffic impacts of the 86 acre project site were a low percent of the entire Legacy Fields Sports Complex. Changes to the description of the 86 acre project site are unlikely to affect the conclusions of the prior analysis.

Although the 2010 EIR analyzed vehicle LOS, CEQA guidelines have changed since adoption of the 2010 EIR. Section 21099(b)(2) of the California Public Resources Code states the following:

> "Upon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment pursuant to this division, except in locations specifically identified in the guidelines, if any."

This certification occurred on December 28, 2018, and vehicle delay and LOS have been removed from consideration under CEQA. With the current CEQA Guidelines, transportation impacts are to be evaluated based on a project's effect on vehicle miles traveled (VMT). The City has not yet adopted revised traffic impact guidelines. However, simultaneous with clearance of the revised *State CEQA Guidelines*, the Governor's Office of Planning and Research (OPR) released the *Technical Advisory for Evaluating Transportation Impacts under CEQA* (OPR, December 2018). This State document provides sufficient guidance to permit the evaluation of project transportation impacts for the purposes of compliance with CEQA.

The *Technical Advisory on Evaluating Transportation Impacts under CEQA* provides screening criteria to determine when land use projects are likely to have a less than significant impact under CEQA. As part of these screening criteria, projects attracting fewer than 110 trips per day would be assumed to have a less than significant impact.

The proposed project is 86 acres. The Institute of Transportation Engineers (ITE) *Trip Generation Manual*, Tenth Edition (2017) provides an average rate of 0.78 daily trips per acre of public park. Based on published trip generation data, the project is estimated to generate 67 daily trips, which is less than the 110 trips per day screening criteria. Therefore, the State's Technical Advisory identifies that the Proposed Project is unlikely to result in a substantial or measureable increase in VMT, and the transportation impact for the purposes of CEQA would be less than significant.

Conflict with CEQA Guidelines Section 15064.3, subdivision (b)

The City has not adopted a threshold of significance for vehicle miles traveled (VMT). However, consistent with CEQA Guidelines, Section 15064.3, subdivision (b), the Proposed Project is presumed to cause a less than significant transportation impact as the Proposed Project is anticipated to generate 67 daily trips, which is less than the 110 trips per day screening criteria. Therefore, this impact is less than significant and no mitigation is required.

Design Features

The 2010 EIR determined that impacts related to design features would be less than significant based on a review of the 2010 Project design. The Proposed Project would include installation of a dedicated intersection and park entrance on Tracy Boulevard. This intersection would be studied and designed consistent with City standards. Therefore, the Proposed Project would not substantially increase hazards due to a design feature. This impact would be less than significant and no mitigation is required

Emergency Access

As described in the 2010 EIR, the Tracy Fire Department was consulted during preparation of the 2010 EIR, and it was determined that the proposed site access points shown in the conceptual plan were adequate for emergency vehicle access. Further, the internal project roadways provide at least 26-feet of roadway width, adequate for emergency vehicle access. Given these considerations, it was determined that the 2010 Project would provide sufficient emergency access. Like the 2010 Project, the design of the Proposed Project would be reviewed by the Fire Department to ensure adequate emergency access. Further, the Proposed Project could be accessed via the internal roadway system at the Legacy Sports Fields Complex, which were determined to provide adequate emergency vehicle access. Therefore, this impact would remain less than significant and the Proposed Project would not result in new or more severe impacts related to emergency access beyond those identified in the 2010 EIR.

Applicable Mitigation

Impacts related to transportation were determined to be less than significant with implementation of various mitigation measures to reduce potential traffic impacts associated with the 2010 Project. As described above, the trip generation associated with the Proposed Project would be less than the established threshold of 110 trips per day; therefore, traffic impacts of the Proposed Project would be less than significant and no mitigation is required. To ensure adequate pedestrian and bicycle facilities are provided, Mitigation Measure 3.12-4, previously identified in the 2010 EIR, would remain applicable to the Proposed Project, as follows:

MM 3.12-14: The following mitigation measures would improve pedestrian and bicycle access to the project site:

- When roadway improvements are made to the frontage on Tracy Boulevard and Corral Hollow that extend to Larch Road, the City shall provide sidewalks along project site as funding becomes available. In addition, pedestrian access points that provide direct access to the active sports park,

future expansion area, and the passive-recreation area should be provided on Tracy Boulevard and Corral Hollow Road.

- The City shall provide a Class III bike route along Tracy Boulevard that would connect to the planned Class III bike route at Clover Road when that bike route is constructed in the future. The recommended Class III route would also provide access to the existing Class III route on Larch Road, east of Tracy Boulevard.

- The City shall provide bicycle parking spaces at each of the surface parking lots that equate to five percent of the number of provided vehicle parking spaces. Overall, the site should provide a total of at least 147 bicycle parking spaces. Bicycle parking stalls should conform to City Code design standards and should be located near the sport field facilities.

Conclusion

Based on the above analysis and discussion, no substantive revisions to the 2010 EIR are required, because no new significant impacts or impacts of substantially greater severity than those identified in the 2010 EIR would result from the Proposed Project. As described above, the Proposed Project would not generate a significant number of vehicle trips; therefore, transportation impacts would be less than significant. Implementation of Mitigation Measure 3.12-14 would continue to effectively reduce impacts related to pedestrian and bicycle facilities. No additional mitigation is required.

18. TRIBAL CULTURAL RESOURCES

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

Discussion

Impacts to tribal resources were not specifically evaluated in the 2010 EIR, as this topic was not a required component of CEQA to be analyzed at the time the 2010 EIR was prepared and certified. However, impacts of the 2010 Project on potential archeological and human remains, which are considered both tribal and cultural resources, were evaluated and were identified as less than significant with implementation of the mitigation measure identified in the 2010 EIR.

Assembly Bill 52 (AB 52), which became law on January 1, 2015, provides for consultation with California Native American tribes during the CEQA environmental review process, and equates significant impacts to "tribal cultural resources" with significant environmental impacts. AB 52 applies to any project for which a Notice of Preparation, Notice of Mitigated Negative Declaration or Notice of Negative Declaration is filed on or after July 1, 2015. Because the Notice of Preparation of the 2010 EIR was filed in December 2008, tribal consultation under AB 52 is not required.

As discussed in Section 5, Cultural Resources, there are no known cultural, historical, or archaeological resources on or within ¼ mile of the project site. Therefore, it is not anticipated that site grading and preparation activities would result in impacts to cultural, historical, or archaeological resources. Implementation of Mitigation Measure 3.5-1 would reduce potential impacts to cultural resources or their accidental discovery during construction to less than significant. This mitigation measure would apply to the Proposed Project.

Applicable Mitigation

As described above, impacts to tribal resources were not specifically evaluated in the 2010 EIR; however, impacts of the Proposed Project on potential archeological and human remains, which are considered both tribal and cultural resources, were evaluated and were identified as less than significant with implementation of Mitigation Measure 3.5-1 identified in the 2010 EIR and listed in Section 5, Cultural Resources. This measure would apply to the Proposed Project. No new mitigation measures are required.

Conclusion

Based on the above analysis and discussion, no substantive revisions to the 2010 EIR are required, because no new significant impacts or impacts of substantially greater severity than those identified in the 2010 EIR would result from the Proposed Project. Although tribal consultation under AB 52 is not required for the Proposed Project, potential impacts to archeological and human remains, which are considered both tribal and cultural resources, were evaluated and were identified as less than significant with implementation of Mitigation Measure 3.5-1 identified in the 2010 EIR and listed in Section 5, Cultural Resources. Impacts associated with tribal cultural resources would be the same as those identified in the 2010 EIR and implementation of Mitigation Measure 3.5-1 would continue to effectively reduce impacts to cultural resources. No additional mitigation is required.

19. UTILITIES AND SERVICE SYSTEMS

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

Discussion

Impacts to utilities and service systems were determined to be less than significant for the 2010 Project. Conditions related to these services are currently the same as when the 2010 EIR was adopted. Impacts related to utilities and service systems are further discussed below.

Construction of New or Expanded Utility Facilities

Water. The 2010 EIR determined that potential impacts associated with construction of new or expanded water infrastructure for the 2010 Project would be less than significant, as the City's existing and additional potable and non-potable water supplies are sufficient to meet the increased water demand associated with construction and operation of the 2010 Project. As described in the 2010 EIR, the project site would receive potable water via a connection to an existing water main located on Tracy Boulevard, near Larch Road. Approximately 2,000 feet of water line would need to be installed on Tracy Boulevard, in addition to the installation of a water lateral on the project site. These improvements were included as part of the 2010 Project and no additional water facilities would be required.

Like the 2010 Project, the Proposed Project would connect to the City's municipal water system. As described in Section 10, Hydrology and Water Quality, the Proposed Project would require limited potable water supply to serve the proposed restroom facility and interpretive center. Therefore, like

the 2010 Project, the Proposed Project would not require the construction of new or expanded water infrastructure.

Wastewater. The 2010 EIR determined that potential impacts associated with wastewater treatment required to serve 2010 Project would be less than significant. Wastewater generation for the 2010 Project was assumed to be approximately 10.5 gallons per day (gpd), per acre of park. Therefore, the 150-acre active sports park site is estimate to generate up to 1,575 gpd of wastewater. Buildout of the 2010 Project, including the 46-acre future expansion area is anticipated to generate 2,058 gpd of wastewater. The City's Wastewater Treatment Plant (WWTP) can effectively treat up to 10.8 million gallons per day (mgd) of wastewater. The City's WWTP currently treats approximately 9.0 mgd of wastewater. Therefore, the 2010 EIR determined that the 2010 Project would not result in the need for new or expanded WWTP facilities, and would not exceed the existing or projected capacity of the City's WWTP. Although the Proposed Project would result in the construction of additional facilities than were assumed in the 2010 EIR for the Passive Recreation Area, the increase in demand for wastewater services would be similar to the 2010 Project and would not significantly decrease the projected available capacity of the City's WWTP. Therefore, the WWTP would have sufficient capacity to serve the Proposed Project. Impacts related to wastewater treatment requirements would remain less than significant and the Proposed Project would not result in any new or more significant impacts than identified in the 2010 EIR.

Stormwater. The 2010 EIR determined that implementation of the 2010 Project would include development of parking facilities, buildings, and spectator seating areas that could product significant increases in storm runoff production. Mitigation Measure 3.8-1, as identified in the 2010 EIR, requires the City to prepare a detailed drainage and stormwater detention plan that includes storm water calculations based on the final site design, and plans for the retention/detention of the calculated stormwater runoff on the project site.

As described in Section 10, Hydrology and Water Quality, the Proposed Project would increase impervious surface on the site, resulting in an increase in stormwater runoff. However, the increase in impervious surfaces would be minimal and the Proposed Project would include features, such as ponding area and infiltration swales that would capture and treat stormwater runoff from the project site. Therefore, impacts related to stormwater would less than significant and Mitigation Measure 3.8-1, as identified in the 2010 EIR, would not be required for the Proposed Project.

Water Supply

The 2010 EIR determined that potential impacts associated with water supply required to serve the 2010 Project would be less than significant. It was determined that the 2010 Project would generate a water demand of approximately 47 af/yr), which would be met using potable water supplies from the City's water system and included the following uses:

- Concession and restroom buildings at the active sports park
- Restroom building in the passive recreation area

- Future recreation center and library, concession and restroom buildings, and children's "spray park" in the future expansion area to the northwest of the Nature Park site.

Based on the analysis conducted for the 2010 EIR, the 2010 EIR determined that the City's existing and additional potable and non-potable water supplies are sufficient to meet the City's existing and projected future potable and non-potable water demands, including those future potable and non-potable water demands associated with the 2010 Project, to the year 2030 under all hydrologic conditions (normal years and dry years).

The Proposed Project would include installation of a restroom facility at the Tracy Boulevard entrance and a 60,000 nature interpretive center; the remainder of the project site would remain largely undeveloped with habitat restoration, landscape planting and trails. Overall, the water demand for the Proposed Project is anticipated to be similar to the 2010 Project. Therefore, impacts would remain less than significant and the Proposed Project would not result in any new or more significant impacts than identified in the 2010 EIR.

Solid Waste

As described in the 2010 EIR, buildout of the Tracy General Plan will generate an estimated 233 tons of solid waste per day. The Foothill landfill receives approximately 810 tons per day, of which 185 tons per day come from the City. The landfill is permitted to accept up to 1,500 tons per day, and has a permitted capacity of 51 million tons, of which approximately 45 million tons of capacity remains.[45] It is estimated that the Foothill landfill will have the capacity to accept solid waste from the City of Tracy until 2054. The 2010 EIR determined that the 2010 Project would not generate a large volume of solid waste that will enter the landfill. Solid waste that will require collection and disposal will be limited to garbage from picnics, sporting events, and other community events. In addition, the City will install recycling bins at the project site, which will further reduce the volume of solid waste that enters the landfill. Like the 2010 Project, the Proposed Project would result in a limited amount of solid waste, which would be adequately served by existing facilities. As such, the Proposed Project would not result in any new or significantly greater impacts than those identified in the 2010 EIR.

Applicable Mitigation

As described in the 2010 EIR, impacts to utilities were determined to be less than significant and no mitigation measures were identified. Based on the analysis above, no substantial changes in environmental circumstances have occurred for this topic, nor revisions to the project, nor new information that could not have been known at the time the 2010 EIR was adopted leading to new or more severe significant impacts, and no new mitigation measures are required.

Conclusion

Based on the above analysis and discussion, no substantive revisions to the 2010 EIR are required, because no new significant impacts or impacts of substantially greater severity than those identified in the 2010 EIR would result from the Proposed Project. With regard to utilities and service systems,

[45] De Novo Planning Group. 2010. op. cit.

the Proposed Project is similar to the 2010 Project and conditions on the project site have not changed considerably since preparation of the 2010 EIR. Therefore, impacts associated with utilities and service systems would be less than significant and no mitigation measures are required.

20. WILDFIRE

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Discussion

As previously discussed in Section 9 of this Environmental Checklist, Hazards and Hazardous Materials, the project site is not located in an area identified by the California Department of Forestry and Fire Protection as a community at risk for wildland fire.[46] The 2010 EIR determined that unmanaged vegetation proposed within the Passive Recreation Area could pose a risk of wildfires in the proximity of existing residences to the south of the project site and identified Mitigation Measure 3.7-2 to reduce potential impacts related to wildfire on the portion of the project site designated for the Tracy Nature Park.

The Proposed Project would include development of native habitats on the project site, including wetland meadows, drainages, oak woodland, and others. It would also include trails and bridges for passive recreation use and a multi-use perimeter trail for more active recreation (e.g., biking). Proposed improvements would improve access to the project site for emergency responders and increase the active management occurring on the site. As a result, the Proposed Project would not expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires. This impact would be less than significant and Mitigation Measure 3.7-2, as identified in the 2010 EIR would not be required.

Applicable Mitigation

As described above, implementation of the Proposed Project would reduce potential impacts associated with wildlfire risk to less than significant; therefore, Mitigation Measure 3.7-2, previously identified in the 2010 EIR would not be required.

[46] Cal Fire, 2007. *San Joaquin County Very High Fire Hazard Severity Zones in LRA.* October 2.

Conclusion

Based on the above analysis and discussion, no substantive revisions to the 2010 EIR are required, because no new significant impacts or impacts of substantially greater severity than those identified in the 2010 EIR would result from the Proposed Project. With regard to wildfire, the Proposed Project is identical to the 2010 Project and the project site is still located within an area with minimal wildfire risk. Impacts associated with wildfire would be less than significant and no mitigation would be required.

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APPENDIX A
CALEEMOD OUTPUT SHEETS

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Tracy Nature Park Project

San Joaquin County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Parking Lot	40.00	Space	0.36	16,000.00	0
City Park	86.00	Acre	86.00	3,746,160.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.7	**Precipitation Freq (Days)**	51
Climate Zone	2			**Operational Year**	2028
Utility Company	Pacific Gas & Electric Company				
CO2 Intensity (lb/MWhr)	328.8	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics - CO2 intensity factor based on 5-year average (PG&E 2015)

Land Use - Assuming an 86-acre park, 60,000 square foot building, and 40 parking spaces.

Construction Phase - Pending grant funding, project construction could commence in late fall 2020 and would be constructed in phases. To be conservative, this analysis assumes the project would be constructed over an approximately 2-year period.

Vehicle Trips - Based on trip generation memorandum prepared for the proposed project.

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	110.00	30.00
tblConstructionPhase	NumDays	1,550.00	260.00
tblConstructionPhase	NumDays	110.00	30.00
tblConstructionPhase	PhaseEndDate	6/9/2028	11/18/2022
tblConstructionPhase	PhaseEndDate	8/6/2027	8/26/2022
tblConstructionPhase	PhaseEndDate	1/7/2028	10/7/2022
tblConstructionPhase	PhaseStartDate	1/8/2028	10/10/2022
tblConstructionPhase	PhaseStartDate	8/7/2027	8/29/2022
tblProjectCharacteristics	CO2IntensityFactor	641.35	328.8
tblVehicleTrips	ST_TR	22.75	0.78
tblVehicleTrips	SU_TR	16.74	0.78
tblVehicleTrips	WD_TR	1.89	0.78

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2020	0.0913	0.9343	0.4845	8.7000e-004	0.4006	0.0484	0.4490	0.2193	0.0445	0.2638	0.0000	76.3448	76.3448	0.0239	0.0000	76.9414
2021	0.8018	7.8641	5.7950	0.0196	1.5800	0.2256	1.8056	0.5653	0.2088	0.7741	0.0000	1,786.9739	1,786.9739	0.2267	0.0000	1,792.6414
2022	1.2231	7.1553	5.9751	0.0273	1.4558	0.0994	1.5552	0.3951	0.0935	0.4885	0.0000	2,526.3760	2,526.3760	0.1571	0.0000	2,530.3025
Maximum	**1.2231**	**7.8641**	**5.9751**	**0.0273**	**1.5800**	**0.2256**	**1.8056**	**0.5653**	**0.2088**	**0.7741**	**0.0000**	**2,526.3760**	**2,526.3760**	**0.2267**	**0.0000**	**2,530.3025**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2020	0.0913	0.9343	0.4845	8.7000e-004	0.4006	0.0484	0.4490	0.2193	0.0445	0.2638	0.0000	76.3447	76.3447	0.0239	0.0000	76.9413
2021	0.8018	7.8641	5.7950	0.0196	1.5800	0.2256	1.8056	0.5653	0.2088	0.7741	0.0000	1,786.9732	1,786.9732	0.2267	0.0000	1,792.6407
2022	1.2231	7.1553	5.9751	0.0273	1.4558	0.0994	1.5552	0.3951	0.0935	0.4885	0.0000	2,526.3757	2,526.3757	0.1571	0.0000	2,530.3022
Maximum	**1.2231**	**7.8641**	**5.9751**	**0.0273**	**1.5800**	**0.2256**	**1.8056**	**0.5653**	**0.2088**	**0.7741**	**0.0000**	**2,526.3757**	**2,526.3757**	**0.2267**	**0.0000**	**2,530.3022**

Tracy Nature Park Project - San Joaquin County, Annual

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	**11-2-2020**	**2-1-2021**	1.5300	1.5300
2	**2-2-2021**	**5-1-2021**	1.6123	1.6123
3	**5-2-2021**	**8-1-2021**	1.6665	1.6665
4	**8-2-2021**	**11-1-2021**	2.7661	2.7661
5	**11-2-2021**	**2-1-2022**	3.1474	3.1474
6	**2-2-2022**	**5-1-2022**	2.8954	2.8954
7	**5-2-2022**	**8-1-2022**	2.9678	2.9678
8	**8-2-2022**	**9-30-2022**	0.9520	0.9520
		Highest	3.1474	3.1474

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.3122	1.0000e-005	1.1500e-003	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.2500e-003	2.2500e-003	1.0000e-005	0.0000	2.4000e-003
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.8352	0.8352	7.0000e-005	2.0000e-005	0.8416
Mobile	0.0125	0.0893	0.1241	6.1000e-004	0.0537	3.8000e-004	0.0541	0.0144	3.5000e-004	0.0147	0.0000	56.5327	56.5327	2.2900e-003	0.0000	56.5900
Waste						0.0000	0.0000		0.0000	0.0000	1.5021	0.0000	1.5021	0.0888	0.0000	3.7215
Water						0.0000	0.0000		0.0000	0.0000	0.0000	53.4874	53.4874	4.7200e-003	9.8000e-004	53.8962
Total	**0.3247**	**0.0893**	**0.1253**	**6.1000e-004**	**0.0537**	**3.8000e-004**	**0.0541**	**0.0144**	**3.5000e-004**	**0.0147**	**1.5021**	**110.8575**	**112.3597**	**0.0959**	**1.0000e-003**	**115.0516**

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.3122	1.0000e-005	1.1500e-003	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.2500e-003	2.2500e-003	1.0000e-005	0.0000	2.4000e-003
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.8352	0.8352	7.0000e-005	2.0000e-005	0.8416
Mobile	0.0125	0.0893	0.1241	6.1000e-004	0.0537	3.8000e-004	0.0541	0.0144	3.5000e-004	0.0147	0.0000	56.5327	56.5327	2.2900e-003	0.0000	56.5900
Waste						0.0000	0.0000		0.0000	0.0000	1.5021	0.0000	1.5021	0.0888	0.0000	3.7215
Water						0.0000	0.0000		0.0000	0.0000	0.0000	53.4874	53.4874	4.7200e-003	9.8000e-004	53.8962
Total	**0.3247**	**0.0893**	**0.1253**	**6.1000e-004**	**0.0537**	**3.8000e-004**	**0.0541**	**0.0144**	**3.5000e-004**	**0.0147**	**1.5021**	**110.8575**	**112.3597**	**0.0959**	**1.0000e-003**	**115.0516**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	11/2/2020	1/22/2021	5	60	
2	Grading	Grading	1/23/2021	8/27/2021	5	155	
3	Building Construction	Building Construction	8/28/2021	8/26/2022	5	260	
4	Paving	Paving	8/29/2022	10/7/2022	5	30	
5	Architectural Coating	Architectural Coating	10/10/2022	11/18/2022	5	30	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 387.5

Acres of Paving: 0.36

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 90,000; Non-Residential Outdoor: 30,000; Striped Parking Area: 960 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	7	18.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	1,580.00	617.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	316.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Site Preparation - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.3975	0.0000	0.3975	0.2185	0.0000	0.2185	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0897	0.9332	0.4733	8.4000e-004		0.0483	0.0483		0.0445	0.0445	0.0000	73.5475	73.5475	0.0238	0.0000	74.1422
Total	**0.0897**	**0.9332**	**0.4733**	**8.4000e-004**	**0.3975**	**0.0483**	**0.4458**	**0.2185**	**0.0445**	**0.2630**	**0.0000**	**73.5475**	**73.5475**	**0.0238**	**0.0000**	**74.1422**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.5800e-003	1.1300e-003	0.0112	3.0000e-005	3.1500e-003	2.0000e-005	3.1800e-003	8.4000e-004	2.0000e-005	8.6000e-004	0.0000	2.7973	2.7973	8.0000e-005	0.0000	2.7992
Total	**1.5800e-003**	**1.1300e-003**	**0.0112**	**3.0000e-005**	**3.1500e-003**	**2.0000e-005**	**3.1800e-003**	**8.4000e-004**	**2.0000e-005**	**8.6000e-004**	**0.0000**	**2.7973**	**2.7973**	**8.0000e-005**	**0.0000**	**2.7992**

3.2 Site Preparation - 2020

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.3975	0.0000	0.3975	0.2185	0.0000	0.2185	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0897	0.9332	0.4733	8.4000e-004		0.0483	0.0483		0.0445	0.0445	0.0000	73.5474	73.5474	0.0238	0.0000	74.1421
Total	**0.0897**	**0.9332**	**0.4733**	**8.4000e-004**	**0.3975**	**0.0483**	**0.4458**	**0.2185**	**0.0445**	**0.2630**	**0.0000**	**73.5474**	**73.5474**	**0.0238**	**0.0000**	**74.1421**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.5800e-003	1.1300e-003	0.0112	3.0000e-005	3.1500e-003	2.0000e-005	3.1800e-003	8.4000e-004	2.0000e-005	8.6000e-004	0.0000	2.7973	2.7973	8.0000e-005	0.0000	2.7992
Total	**1.5800e-003**	**1.1300e-003**	**0.0112**	**3.0000e-005**	**3.1500e-003**	**2.0000e-005**	**3.1800e-003**	**8.4000e-004**	**2.0000e-005**	**8.6000e-004**	**0.0000**	**2.7973**	**2.7973**	**8.0000e-005**	**0.0000**	**2.7992**

3.2 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1445	0.0000	0.1445	0.0795	0.0000	0.0795	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0311	0.3240	0.1692	3.0000e-004		0.0164	0.0164		0.0151	0.0151	0.0000	26.7486	26.7486	8.6500e-003	0.0000	26.9649
Total	**0.0311**	**0.3240**	**0.1692**	**3.0000e-004**	**0.1445**	**0.0164**	**0.1609**	**0.0795**	**0.0151**	**0.0945**	**0.0000**	**26.7486**	**26.7486**	**8.6500e-003**	**0.0000**	**26.9649**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.3000e-004	3.7000e-004	3.7100e-003	1.0000e-005	1.1500e-003	1.0000e-005	1.1500e-003	3.0000e-004	1.0000e-005	3.1000e-004	0.0000	0.9789	0.9789	2.0000e-005	0.0000	0.9795
Total	**5.3000e-004**	**3.7000e-004**	**3.7100e-003**	**1.0000e-005**	**1.1500e-003**	**1.0000e-005**	**1.1500e-003**	**3.0000e-004**	**1.0000e-005**	**3.1000e-004**	**0.0000**	**0.9789**	**0.9789**	**2.0000e-005**	**0.0000**	**0.9795**

3.2 Site Preparation - 2021

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1445	0.0000	0.1445	0.0795	0.0000	0.0795	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0311	0.3240	0.1692	3.0000e-004		0.0164	0.0164		0.0151	0.0151	0.0000	26.7485	26.7485	8.6500e-003	0.0000	26.9648
Total	**0.0311**	**0.3240**	**0.1692**	**3.0000e-004**	**0.1445**	**0.0164**	**0.1609**	**0.0795**	**0.0151**	**0.0945**	**0.0000**	**26.7485**	**26.7485**	**8.6500e-003**	**0.0000**	**26.9648**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.3000e-004	3.7000e-004	3.7100e-003	1.0000e-005	1.1500e-003	1.0000e-005	1.1500e-003	3.0000e-004	1.0000e-005	3.1000e-004	0.0000	0.9789	0.9789	2.0000e-005	0.0000	0.9795
Total	**5.3000e-004**	**3.7000e-004**	**3.7100e-003**	**1.0000e-005**	**1.1500e-003**	**1.0000e-005**	**1.1500e-003**	**3.0000e-004**	**1.0000e-005**	**3.1000e-004**	**0.0000**	**0.9789**	**0.9789**	**2.0000e-005**	**0.0000**	**0.9795**

3.3 Grading - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.6722	0.0000	0.6722	0.2787	0.0000	0.2787	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.3248	3.5960	2.3931	4.8100e-003		0.1539	0.1539		0.1416	0.1416	0.0000	422.3361	422.3361	0.1366	0.0000	425.7509
Total	**0.3248**	**3.5960**	**2.3931**	**4.8100e-003**	**0.6722**	**0.1539**	**0.8260**	**0.2787**	**0.1416**	**0.4203**	**0.0000**	**422.3361**	**422.3361**	**0.1366**	**0.0000**	**425.7509**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.7100e-003	3.9500e-003	0.0399	1.2000e-004	0.0124	8.0000e-005	0.0124	3.2800e-003	7.0000e-005	3.3600e-003	0.0000	10.5362	10.5362	2.7000e-004	0.0000	10.5429
Total	**5.7100e-003**	**3.9500e-003**	**0.0399**	**1.2000e-004**	**0.0124**	**8.0000e-005**	**0.0124**	**3.2800e-003**	**7.0000e-005**	**3.3600e-003**	**0.0000**	**10.5362**	**10.5362**	**2.7000e-004**	**0.0000**	**10.5429**

3.3 Grading - 2021

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.6722	0.0000	0.6722	0.2787	0.0000	0.2787	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.3248	3.5960	2.3931	4.8100e-003		0.1539	0.1539		0.1416	0.1416	0.0000	422.3356	422.3356	0.1366	0.0000	425.7504
Total	**0.3248**	**3.5960**	**2.3931**	**4.8100e-003**	**0.6722**	**0.1539**	**0.8260**	**0.2787**	**0.1416**	**0.4203**	**0.0000**	**422.3356**	**422.3356**	**0.1366**	**0.0000**	**425.7504**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.7100e-003	3.9500e-003	0.0399	1.2000e-004	0.0124	8.0000e-005	0.0124	3.2800e-003	7.0000e-005	3.3600e-003	0.0000	10.5362	10.5362	2.7000e-004	0.0000	10.5429
Total	**5.7100e-003**	**3.9500e-003**	**0.0399**	**1.2000e-004**	**0.0124**	**8.0000e-005**	**0.0124**	**3.2800e-003**	**7.0000e-005**	**3.3600e-003**	**0.0000**	**10.5362**	**10.5362**	**2.7000e-004**	**0.0000**	**10.5429**

3.4 Building Construction - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0855	0.7844	0.7459	1.2100e-003		0.0431	0.0431		0.0406	0.0406	0.0000	104.2368	104.2368	0.0252	0.0000	104.8655
Total	**0.0855**	**0.7844**	**0.7459**	**1.2100e-003**		**0.0431**	**0.0431**		**0.0406**	**0.0406**	**0.0000**	**104.2368**	**104.2368**	**0.0252**	**0.0000**	**104.8655**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0921	2.9740	0.6131	7.7800e-003	0.1834	8.4500e-003	0.1919	0.0530	8.0900e-003	0.0611	0.0000	738.8321	738.8321	0.0437	0.0000	739.9238
Worker	0.2620	0.1814	1.8301	5.3500e-003	0.5663	3.7100e-003	0.5701	0.1506	3.4200e-003	0.1540	0.0000	483.3053	483.3053	0.0123	0.0000	483.6139
Total	**0.3541**	**3.1554**	**2.4432**	**0.0131**	**0.7498**	**0.0122**	**0.7619**	**0.2036**	**0.0115**	**0.2151**	**0.0000**	**1,222.1374**	**1,222.1374**	**0.0560**	**0.0000**	**1,223.5377**

3.4 Building Construction - 2021

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0855	0.7844	0.7459	1.2100e-003		0.0431	0.0431		0.0406	0.0406	0.0000	104.2367	104.2367	0.0252	0.0000	104.8653
Total	**0.0855**	**0.7844**	**0.7459**	**1.2100e-003**		**0.0431**	**0.0431**		**0.0406**	**0.0406**	**0.0000**	**104.2367**	**104.2367**	**0.0252**	**0.0000**	**104.8653**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0921	2.9740	0.6131	7.7800e-003	0.1834	8.4500e-003	0.1919	0.0530	8.0900e-003	0.0611	0.0000	738.8321	738.8321	0.0437	0.0000	739.9238
Worker	0.2620	0.1814	1.8301	5.3500e-003	0.5663	3.7100e-003	0.5701	0.1506	3.4200e-003	0.1540	0.0000	483.3053	483.3053	0.0123	0.0000	483.6139
Total	**0.3541**	**3.1554**	**2.4432**	**0.0131**	**0.7498**	**0.0122**	**0.7619**	**0.2036**	**0.0115**	**0.2151**	**0.0000**	**1,222.1374**	**1,222.1374**	**0.0560**	**0.0000**	**1,223.5377**

3.4 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1450	1.3273	1.3909	2.2900e-003		0.0688	0.0688		0.0647	0.0647	0.0000	196.9665	196.9665	0.0472	0.0000	198.1462
Total	**0.1450**	**1.3273**	**1.3909**	**2.2900e-003**		**0.0688**	**0.0688**		**0.0647**	**0.0647**	**0.0000**	**196.9665**	**196.9665**	**0.0472**	**0.0000**	**198.1462**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.1614	5.3221	1.0684	0.0146	0.3465	0.0138	0.3603	0.1001	0.0132	0.1134	0.0000	1,382.5333	1,382.5333	0.0783	0.0000	1,384.4903
Worker	0.4591	0.3065	3.1533	9.7400e-003	1.0698	6.8000e-003	1.0766	0.2844	6.2600e-003	0.2907	0.0000	880.4550	880.4550	0.0209	0.0000	880.9765
Total	**0.6206**	**5.6286**	**4.2217**	**0.0243**	**1.4162**	**0.0206**	**1.4369**	**0.3846**	**0.0195**	**0.4040**	**0.0000**	**2,262.9884**	**2,262.9884**	**0.0991**	**0.0000**	**2,265.4668**

3.4 Building Construction - 2022

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1450	1.3273	1.3909	2.2900e-003		0.0688	0.0688		0.0647	0.0647	0.0000	196.9662	196.9662	0.0472	0.0000	198.1459
Total	**0.1450**	**1.3273**	**1.3909**	**2.2900e-003**		**0.0688**	**0.0688**		**0.0647**	**0.0647**	**0.0000**	**196.9662**	**196.9662**	**0.0472**	**0.0000**	**198.1459**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.1614	5.3221	1.0684	0.0146	0.3465	0.0138	0.3603	0.1001	0.0132	0.1134	0.0000	1,382.5333	1,382.5333	0.0783	0.0000	1,384.4903
Worker	0.4591	0.3065	3.1533	9.7400e-003	1.0698	6.8000e-003	1.0766	0.2844	6.2600e-003	0.2907	0.0000	880.4550	880.4550	0.0209	0.0000	880.9765
Total	**0.6206**	**5.6286**	**4.2217**	**0.0243**	**1.4162**	**0.0206**	**1.4369**	**0.3846**	**0.0195**	**0.4040**	**0.0000**	**2,262.9884**	**2,262.9884**	**0.0991**	**0.0000**	**2,265.4668**

3.5 Paving - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0165	0.1669	0.2187	3.4000e-004		8.5200e-003	8.5200e-003		7.8400e-003	7.8400e-003	0.0000	30.0413	30.0413	9.7200e-003	0.0000	30.2842
Paving	4.7000e-004					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0170**	**0.1669**	**0.2187**	**3.4000e-004**		**8.5200e-003**	**8.5200e-003**		**7.8400e-003**	**7.8400e-003**	**0.0000**	**30.0413**	**30.0413**	**9.7200e-003**	**0.0000**	**30.2842**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.7000e-004	5.1000e-004	5.2800e-003	2.0000e-005	1.7900e-003	1.0000e-005	1.8000e-003	4.8000e-004	1.0000e-005	4.9000e-004	0.0000	1.4751	1.4751	3.0000e-005	0.0000	1.4760
Total	**7.7000e-004**	**5.1000e-004**	**5.2800e-003**	**2.0000e-005**	**1.7900e-003**	**1.0000e-005**	**1.8000e-003**	**4.8000e-004**	**1.0000e-005**	**4.9000e-004**	**0.0000**	**1.4751**	**1.4751**	**3.0000e-005**	**0.0000**	**1.4760**

3.5 Paving - 2022

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0165	0.1669	0.2187	3.4000e-004		8.5200e-003	8.5200e-003		7.8400e-003	7.8400e-003	0.0000	30.0413	30.0413	9.7200e-003	0.0000	30.2842
Paving	4.7000e-004					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0170**	**0.1669**	**0.2187**	**3.4000e-004**		**8.5200e-003**	**8.5200e-003**		**7.8400e-003**	**7.8400e-003**	**0.0000**	**30.0413**	**30.0413**	**9.7200e-003**	**0.0000**	**30.2842**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.7000e-004	5.1000e-004	5.2800e-003	2.0000e-005	1.7900e-003	1.0000e-005	1.8000e-003	4.8000e-004	1.0000e-005	4.9000e-004	0.0000	1.4751	1.4751	3.0000e-005	0.0000	1.4760
Total	**7.7000e-004**	**5.1000e-004**	**5.2800e-003**	**2.0000e-005**	**1.7900e-003**	**1.0000e-005**	**1.8000e-003**	**4.8000e-004**	**1.0000e-005**	**4.9000e-004**	**0.0000**	**1.4751**	**1.4751**	**3.0000e-005**	**0.0000**	**1.4760**

3.6 Architectural Coating - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.4205					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.0700e-003	0.0211	0.0272	4.0000e-005		1.2300e-003	1.2300e-003		1.2300e-003	1.2300e-003	0.0000	3.8299	3.8299	2.5000e-004	0.0000	3.8361
Total	**0.4236**	**0.0211**	**0.0272**	**4.0000e-005**		**1.2300e-003**	**1.2300e-003**		**1.2300e-003**	**1.2300e-003**	**0.0000**	**3.8299**	**3.8299**	**2.5000e-004**	**0.0000**	**3.8361**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0162	0.0108	0.1113	3.4000e-004	0.0378	2.4000e-004	0.0380	0.0100	2.2000e-004	0.0103	0.0000	31.0749	31.0749	7.4000e-004	0.0000	31.0933
Total	**0.0162**	**0.0108**	**0.1113**	**3.4000e-004**	**0.0378**	**2.4000e-004**	**0.0380**	**0.0100**	**2.2000e-004**	**0.0103**	**0.0000**	**31.0749**	**31.0749**	**7.4000e-004**	**0.0000**	**31.0933**

3.6 Architectural Coating - 2022

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.4205					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.0700e-003	0.0211	0.0272	4.0000e-005		1.2300e-003	1.2300e-003		1.2300e-003	1.2300e-003	0.0000	3.8299	3.8299	2.5000e-004	0.0000	3.8361
Total	**0.4236**	**0.0211**	**0.0272**	**4.0000e-005**		**1.2300e-003**	**1.2300e-003**		**1.2300e-003**	**1.2300e-003**	**0.0000**	**3.8299**	**3.8299**	**2.5000e-004**	**0.0000**	**3.8361**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0162	0.0108	0.1113	3.4000e-004	0.0378	2.4000e-004	0.0380	0.0100	2.2000e-004	0.0103	0.0000	31.0749	31.0749	7.4000e-004	0.0000	31.0933
Total	**0.0162**	**0.0108**	**0.1113**	**3.4000e-004**	**0.0378**	**2.4000e-004**	**0.0380**	**0.0100**	**2.2000e-004**	**0.0103**	**0.0000**	**31.0749**	**31.0749**	**7.4000e-004**	**0.0000**	**31.0933**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0125	0.0893	0.1241	6.1000e-004	0.0537	3.8000e-004	0.0541	0.0144	3.5000e-004	0.0147	0.0000	56.5327	56.5327	2.2900e-003	0.0000	56.5900
Unmitigated	0.0125	0.0893	0.1241	6.1000e-004	0.0537	3.8000e-004	0.0541	0.0144	3.5000e-004	0.0147	0.0000	56.5327	56.5327	2.2900e-003	0.0000	56.5900

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
City Park	67.08	67.08	67.08	143,206	143,206
Parking Lot	0.00	0.00	0.00		
Total	67.08	67.08	67.08	143,206	143,206

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
City Park	9.50	7.30	7.30	33.00	48.00	19.00	66	28	6
Parking Lot	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
City Park	0.577759	0.032683	0.189799	0.103168	0.012166	0.004000	0.015643	0.056468	0.001177	0.001245	0.004712	0.000587	0.000595
Parking Lot	0.577759	0.032683	0.189799	0.103168	0.012166	0.004000	0.015643	0.056468	0.001177	0.001245	0.004712	0.000587	0.000595

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.8352	0.8352	7.0000e-005	2.0000e-005	0.8416
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.8352	0.8352	7.0000e-005	2.0000e-005	0.8416
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
City Park	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	5600	0.8352	7.0000e-005	2.0000e-005	0.8416
Total		**0.8352**	**7.0000e-005**	**2.0000e-005**	**0.8416**

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
City Park	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	5600	0.8352	7.0000e-005	2.0000e-005	0.8416
Total		**0.8352**	**7.0000e-005**	**2.0000e-005**	**0.8416**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.3122	1.0000e-005	1.1500e-003	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.2500e-003	2.2500e-003	1.0000e-005	0.0000	2.4000e-003
Unmitigated	0.3122	1.0000e-005	1.1500e-003	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.2500e-003	2.2500e-003	1.0000e-005	0.0000	2.4000e-003

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0421					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.2700					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.1000e-004	1.0000e-005	1.1500e-003	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.2500e-003	2.2500e-003	1.0000e-005	0.0000	2.4000e-003
Total	**0.3122**	**1.0000e-005**	**1.1500e-003**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**2.2500e-003**	**2.2500e-003**	**1.0000e-005**	**0.0000**	**2.4000e-003**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0421					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.2700					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.1000e-004	1.0000e-005	1.1500e-003	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.2500e-003	2.2500e-003	1.0000e-005	0.0000	2.4000e-003
Total	**0.3122**	**1.0000e-005**	**1.1500e-003**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**2.2500e-003**	**2.2500e-003**	**1.0000e-005**	**0.0000**	**2.4000e-003**

7.0 Water Detail

7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	53.4874	4.7200e-003	9.8000e-004	53.8962
Unmitigated	53.4874	4.7200e-003	9.8000e-004	53.8962

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
City Park	0 / 102.467	53.4874	4.7200e-003	9.8000e-004	53.8962
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**53.4874**	**4.7200e-003**	**9.8000e-004**	**53.8962**

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
City Park	0 / 102.467	53.4874	4.7200e-003	9.8000e-004	53.8962
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**53.4874**	**4.7200e-003**	**9.8000e-004**	**53.8962**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	1.5021	0.0888	0.0000	3.7215
Unmitigated	1.5021	0.0888	0.0000	3.7215

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
City Park	7.4	1.5021	0.0888	0.0000	3.7215
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Total		**1.5021**	**0.0888**	**0.0000**	**3.7215**

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
City Park	7.4	1.5021	0.0888	0.0000	3.7215
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Total		**1.5021**	**0.0888**	**0.0000**	**3.7215**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

RESOLUTION 2021-012

ADOPTING THE NATURE PARK CONCEPTUAL MASTER PLAN AND ADDENDUM TO THE 2010 HOLLY SUGAR SPORTS PROJECT ENVIRONMENTAL IMPACT REPORT

WHEREAS, On March 5, 2019 the City Council approved a professional services agreement (PSA) with WRT, LLC (WRT) of San Francisco, California to establish a vision for an 86-acre nature park by creating a conceptual master plan and conducting necessary environmental review, and

WHEREAS, WRT worked with City staff, stakeholders and community members through a series of public engagements, including a site visit, to define what a nature park experience should look like in the City of Tracy, and

WHEREAS, On May 28th, 2020 the Nature Park Conceptual Master Plan (the Project) was accepted and recommended to the City Council for final adoption by the Parks & Community Services Commission; and

WHEREAS, In compliance with the requirements of the California Environmental Quality Act (CEQA) and its implementing regulations (the CEQA Guidelines), the City prepared an Initial Study to assess whether the Project is within the scope of the development program evaluated in that certain Holly Sugar Sports Park Project Environmental Impact Report carrying State Clearinghouse Number 2008122103 and dated June 2010 (the 2010 EIR) and whether any further environmental review is required for the Project, and

WHEREAS, based on the Initial Study, the City has determined that the Project is within the scope of the development program evaluated in the 2010 EIR and, pursuant to Sections 15162, 15164 and 15168(c)(2) of the CEQA Guidelines, an Addendum to the 2010 EIR is the appropriate form of CEQA compliance for the Project and no further environmental review is required for the Project; the combined Initial Study/Addendum for the Project is on file with the Parks & Recreation Department.

NOW, THEREFORE, BE IT RESOLVED, That the City Council of the City of Tracy hereby approves and adopts the Nature Park Conceptual Master Plan, attached as Exhibit A and the Initial Study/Addendum to the 2010 Holly Sugar Sports Park Project Environmental Impact Report, attached as Exhibit B.

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The foregoing Resolution 2021-012 was adopted by the Tracy City Council on the 2nd day of February, 2021, by the following vote:

AYES: COUNCIL MEMBERS: ARRIOLA, BEDOLLA, DAVIS, VARGAS, YOUNG
NOES: COUNCIL MEMBERS: NONE
ABSENT: COUNCIL MEMBERS: NONE
ABSTAIN: COUNCIL MEMBERS: NONE

MAYOR

ATTEST:

CITY CLERK