

COMMUNITY & ECONOMIC DEVELOPMENT DIRECTOR PUBLIC HEARING  
MEETING AGENDA

**Wednesday, January 22, 2025, 11:00 A.M.**

Tracy City Hall, Conference Room 203, 333 Civic Center Plaza, Tracy

**THIS MEETING WILL BE OPEN TO THE PUBLIC FOR IN-PERSON AND REMOTE  
PARTICIPATION PURSUANT TO GOVERNMENT CODE SECTION 54953(e).**

*During the upcoming Director Public Hearing meeting, public comment will be accepted via the options listed below. All interested persons are invited to participate by:*

- *joining the meeting via Microsoft Teams by:*
  - *viewing the Public Hearing Login information at <https://www.cityoftracy.org/government/public-notices>; or*
  - *visiting the Microsoft Teams website at <https://www.microsoft.com/microsoft-teams/join-a-meeting> and using the following Meeting ID: 212 621 413 919 and Passcode: Ey94Ec2Y; or*
  - *calling the Microsoft Teams teleconference line at (209) 425-4338 Conference ID: 753 802 292# to submit statements orally during the meeting; or*
- *submitting comments in writing before the meeting by sending written statements to [publiccomment@cityoftracy.org](mailto:publiccomment@cityoftracy.org).*

**MEETING AGENDA**

**CALL TO ORDER**

1. STAFF RECOMMENDS THAT THE COMMUNITY AND ECONOMIC DEVELOPMENT DIRECTOR APPROVE AN ADDENDUM TO THE INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION FOR THE TRACY DESALINATION AND GREEN ENERGY PROJECT TO COMPLY WITH THE REQUIREMENTS OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) AND THE CEQA GUIDELINES, PURSUANT TO CEQA GUIDELINES SECTION 15162 AND 15164, FOR PROPOSED PROJECT REVISIONS TO CONSTRUCT AND ELECTRIFIED DOWNER CALCINER, INCLUDING A TOWER OF APPROXIMATELY 165 FEET IN HEIGHT (WITH A MAXIMUM HEIGHT OF 200 FEET) AND AN APPROXIMATELY 5,000 SQUARE FOOT OFFICE/WAREHOUSE BUILDING, LOCATED AT 4750 HOLLY DRIVE, ASSESSOR'S PARCEL NUMBER 212-160-11.

**ADJOURNMENT**

Posted: January 21, 2025



# DIRECTOR HEARING STAFF REPORT

Item No. 1

<b>DATE</b>	January 22, 2025
<b>TITLE</b>	Addendum to Initial Study/Mitigated Negative Declaration for the Tracy Desalination and Green Energy Project
<b>LOCATION</b>	4750 Holly Drive (APN: 212-160-11)
<b>APPLICATION TYPE</b>	Addendum to Initial Study/Mitigated Negative Declaration
<b>CEQA STATUS</b>	Addendum to Initial Study/Mitigated Negative Declaration
<b>PROJECT PLANNER</b>	Scott Claar (209) 831-6429 <a href="mailto:scott.claar@cityoftracy.org">scott.claar@cityoftracy.org</a>

## RECOMMENDATION

Staff recommends that the Community and Economic Development Director approve an Addendum to the Initial Study and Mitigated Negative Declaration for the Tracy Desalination and Green Energy Project to comply with the requirements of the California Environmental Quality Act (CEQA) and the CEQA Guidelines, pursuant to CEQA Guidelines Section 15162 and 15164, for proposed project revisions to construct and electrified downer calciner, including a tower of approximately 165 feet in height (with a maximum height of 200 feet) and an approximately 5,000 square foot office/warehouse building, located at 4750 Holly Drive, Assessor's Parcel Number 212-160-11.

## BACKGROUND

On May 1, 2012, the City Council adopted an Initial Study/Mitigated Negative Declaration (IS/MND) for the Tracy Desalination and Green Energy Project. The IS/MND evaluated potential impacts associated with annexation of the 237-acre site to the City of Tracy, a General Plan Amendment to designate the site Industrial, rezoning of the site to Industrial, and impacts associated with the construction and operation of a 1.2 million gallons per day (MGD) desalination plant and biomass electricity generation facility located at 4750 Holly Drive, Assessor's Parcel Number 212-160-11.

On December 14, 2022, the Development Services Director approved an Addendum to the IS/MND for the Tracy Desalination and Green Energy Project to comply with the requirements of the California Environmental Quality Act (CEQA) and the CEQA Guidelines, pursuant to CEQA Guidelines Sections 15162 and 15164, for the construction of a facility to remove carbon dioxide from the atmosphere, including a 12,750 square foot equipment enclosure, a 25,600 square foot open-air equipment yard, a 1,500 square foot office trailer, parking area and landscaping

improvements. The carbon dioxide removal facility was a revision to a 2.2-acre portion of the 237-acre Tracy Desalination and Green Energy project site.

## **PROJECT REVISIONS**

The applicant, Heirloom Carbon Technologies, is proposing to add a calciner reactor and office/warehouse building within the 2.2-acre portion of the site that includes their existing carbon dioxide removal facility. Specifically, Heirloom Carbon Technologies proposes the construction of an electrified downer calciner, project code-named “Wonder Woman”, along with a supporting warehouse/office space for their research and development (R&D) teams. The calciner would include an approximately 165' tall tower (with a maximum height of no greater than 200' feet tall). The proposed office/warehouse space would encompass approximately 5,000 square feet. The calciner would be used to remove carbon dioxide from the atmosphere to assist with meeting the State’s carbon emission reduction goals.

### California Environmental Quality Act Requirements

An Addendum to the IS/MND for the Tracy Desalination and Green Energy Project has been prepared for the project revisions to comply with the requirements of the California Environmental Quality Act (CEQA) and the CEQA Guidelines, pursuant to CEQA Guidelines Sections 15162 and 15164, as shown in Exhibit 1 of Attachment C, and based on the following findings:

1. The project revisions will not result in new significant impacts, which were not addressed in the previous IS/MND.
2. The project revisions will not substantially increase the severity of any environmental impacts beyond what was shown in the previous IS/MND.
3. There are no new feasible alternatives or mitigation measures, which were previously found not to be feasible, that would reduce any impacts shown in the previous IS/MND.

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## **ATTACHMENTS**

- A – Location Map
- B – Project Plans
- C – Community and Economic Development Director Determination  
Exhibit 1 – Addendum to IS/MND



Holly Drive

Tracy Desalination  
Plant

Future Bio-Mass  
Power Plant Site

Project Site

Arbor Avenue

## Attachment B

MITHUN®

SEATTLE | Pier 56, 1201 Alaskan Way, #200  
Seattle, WA 98101 / 206.623.3344

SAN FRANCISCO | 660 Market Street, #300  
San Francisco, CA 94104 / 415.956.0688

LOS ANGELES | 5837 Adams Blvd  
Culver City, CA 90232 / 323.937.2150  
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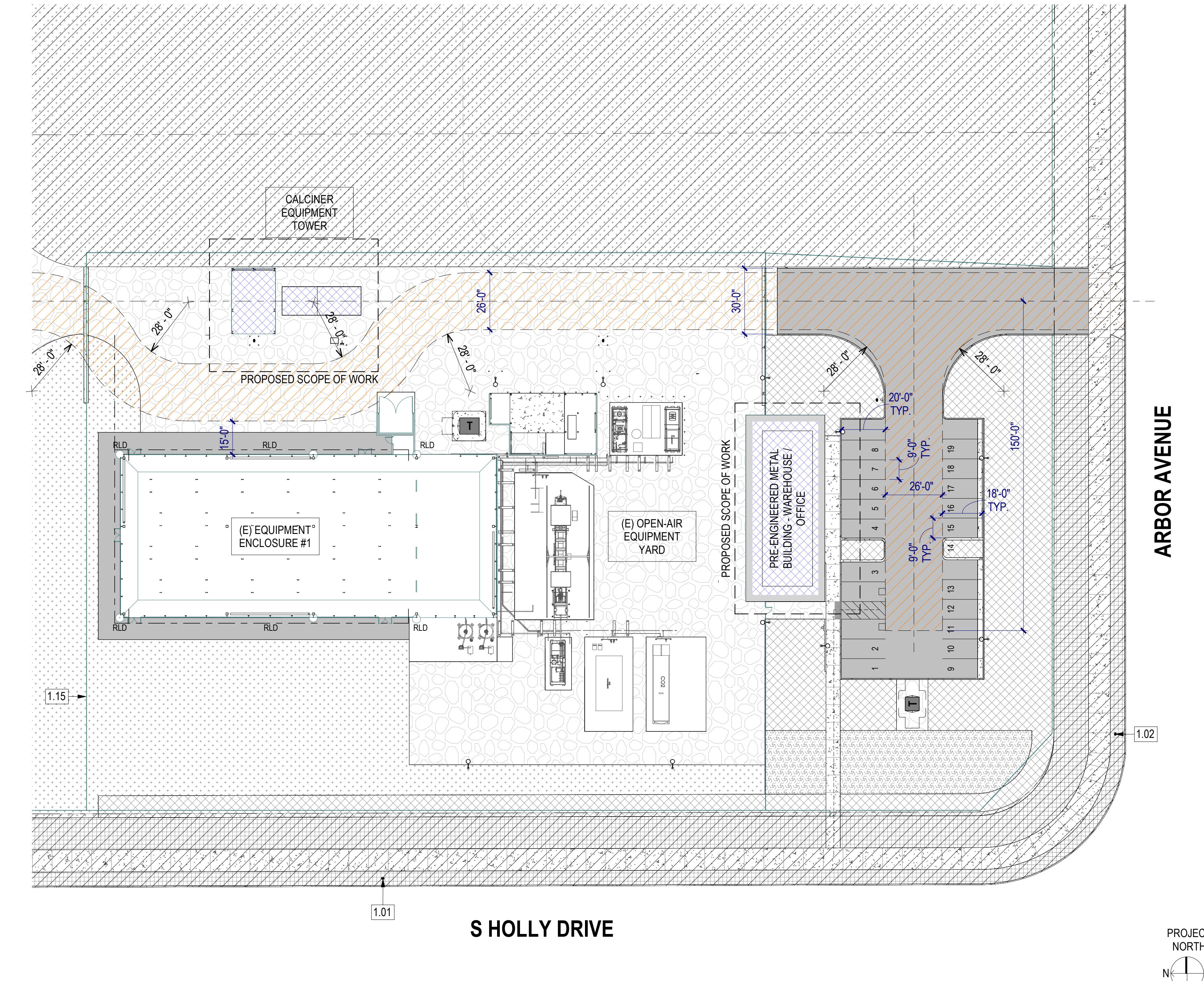
### LEGEND - SITE PLAN

— - - - -	PROPERTY LINE
— - - - -	ACCESSIBLE PATH OF TRAVEL
— - - - -	EGRESS PATH OF TRAVEL
▨▨▨▨▨	AREA NOT IN SCOPE
▨▨▨▨▨	PROPOSED SCOPE OF WORK: WAREHOUSE & CALCINER TOWER
(E) LANDSCAPING	(E) LANDSCAPING
(E) CONCRETE PAVING & SIDEWALK	(E) CONCRETE PAVING & SIDEWALK
(E) COMPACTED AGGREGATE BASE	(E) COMPACTED AGGREGATE BASE
(E) ASPHALT PAVEMENT	(E) ASPHALT PAVEMENT
▨▨▨▨▨	FIRE EQUIPMENT ACCESS
— - - - -	(E) CHAIN LINK FENCING

PROJECT  
**PILOT PLANT PROJECT**

LOCATION  
**4750 S HOLLY DRIVE,  
TRACY, CA 95304**

PREPARED FOR  
**HEIRLOOM CARBON  
TECHNOLOGIES**



### 1 SITE PLAN - PRELIMINARY PH2

1" = 30'-0"

PROJECT  
NORTH  
N

TITLE  
**ARCHITECTURAL SITE  
PLAN**

PROJECT NO.  
**2229800**  
DATE  
**10/18/24**

ORIGINAL SHEET SIZE 24" x 36"

**AP-1.0**  
HEIRLOOM UNO  
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**CITY OF TRACY**  
**DETERMINATION OF**  
**THE COMMUNITY AND ECONOMIC DEVELOPMENT DIRECTOR**

Application Number P25-0001

A determination of the Community and Economic Development Director to approve an Addendum to the Initial Study and Mitigated Negative Declaration (IS/MND) for the Tracy Desalination and Green Energy Project to comply with the requirements of the California Environmental Quality Act (CEQA) and the CEQA Guidelines, pursuant to CEQA Guidelines Sections 15162 and 15164, for proposed project revisions to construct an electrified downer calciner, including a tower of approximately 165 feet in height (with a maximum height of 200 feet) and an approximately 5,000 square foot office/warehouse building. The calciner would be used to remove carbon dioxide from the atmosphere to assist in meeting the State's carbon emission reduction goals. The project is located at 4750 Holly Drive, Assessor's Parcel Number 212-160-11. The applicant is Heirloom Carbon Technologies, Inc. and the property owner is the City of Tracy.

An Initial Study and Mitigated Negative Declaration (IS/MND) for the Tracy Desalination and Green Energy Project was adopted by the City Council on May 1, 2012 (Resolution No. 2012-75), in accordance with the requirements of the California Environmental Quality Act (CEQA) and the CEQA Guidelines.

Staff has reviewed the project revisions and determined that the following regulations apply:

1. California Environmental Quality Act (CEQA)
2. CEQA Guidelines, Sections 15162 and 15164

THE COMMUNITY AND ECONOMIC DEVELOPMENT DIRECTOR, AFTER CONSIDERING ALL OF THE EVIDENCE PRESENTED, HEREBY APPROVES AN ADDENDUM TO THE IS/MND FOR THE TRACY DESALINATION AND GREEN ENERGY PROJECT, PURSUANT TO CEQA GUIDELINES SECTIONS 15162 AND 15164, AS SHOWN IN EXHIBIT 1, AND BASED ON THE FOLLOWING FINDINGS:

1. The project revisions will not result in new significant impacts, which were not addressed in the previous IS/MND.
2. The project revisions will not substantially increase the severity of any environmental impacts beyond what was shown in the previous IS/MND.
3. There are no new feasible alternatives or mitigation measures, which were previously found not to be feasible, that would reduce any impacts shown in the previous IS/MND.

ADDENDUM  
TO THE  
INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION  
FOR THE  
TRACY DESALINATION AND GREEN ENERGY PROJECT

SCH# 2011122004

DECEMBER 2024

*Prepared for:*

City of Tracy  
Community and Economic Development Department  
Planning Division  
333 Civic Center Plaza  
Tracy, CA 95376

*Prepared by:*

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## 1.0 INTRODUCTION

This environmental document is an Addendum to the Tracy Desalination and Green Energy Project Initial Study/Mitigated Negative Declaration (IS/MND), SCH # 2011122004, GPA 11-0004 and A/P 11-0001. The project and the IS/MND for this project were approved and adopted by the City of Tracy City Council on May 1, 2012. Since certification and adoption of the IS/MND, the project plans have been slightly modified, requiring the need for further environmental analysis, as contained in this document.

### 1.1 BACKGROUND

The Tracy Desalination and Green Energy Project IS/MND (SCH# 2011122004) was completed and circulated for public review and comment in December 2011. The IS/MND evaluated potential impacts associated with annexation of the site to the City of Tracy, a General Plan Amendment to designate the site Industrial, rezoning of the site to Industrial, and impacts associated with the construction and operation of a 1.2 million gallons per day (MGD) desalination plant and biomass electricity generation facility. The IS/MND addressed the full range of environmental topics included in Appendix G of the CEQA Guidelines, including: aesthetics, agricultural and forest resources; air quality; biological resources; cultural resources; geology and soils; greenhouse gas emissions; hazards and hazardous materials; hydrology and water quality; land use and planning; mineral resources; noise; population and housing; public services; recreation; transportation and traffic; utilities and service systems; and cumulative impacts.

All environmental impacts addressed in the IS/MND have been mitigated to below a level of significance through implementation of mitigation measures.

Since certification of the IS/MND and approval of the project on May 1, 2012, the project had previously undergone minor revisions related to the addition of a carbon dioxide removal facility within a small portion of the project site. These revisions were described in Section 2.0 of a previous Addendum prepared for the project, in December 2022.

Subsequently, the project now seeks to add a calciner reactor and office building to the site. Specifically, Heirloom Carbon Technologies proposes the construction of an electrified downer calciner, project code-named “WonderWoman”, along with a supporting warehouse/office space for their research and development (R&D) teams. The calciner would include an approximately 165' tall tower (with a maximum height of no greater than 200' feet tall), and would be surrounded with chain link fence. The proposed office/warehouse space would encompass approximately 5,000 square feet (sf). These revisions are described in Section 2.0 of this document, and are the subject of this Addendum.

### 1.2 PURPOSE OF THE ADDENDUM

When a proposed project is changed after project approval and certification of an environmental document prepared under CEQA, a determination must be made by the Lead Agency as to whether an Addendum or a Subsequent MND is prepared. Criteria, as set forth in CEQA

Guidelines Section 15162, are used to assess which environmental document is appropriate. The criteria for determining whether an Addendum or Subsequent MND is prepared are outlined below. If the criteria below are true and applicable to the project, then an Addendum is the appropriate environmental document.

1. No new significant impacts will result from the project or from new mitigation measures.
2. No substantial increase in the severity of an environmental impact will occur.
3. No new feasible alternatives or mitigation measures that would reduce impacts previously found not to be feasible have, in fact, been found to be feasible.

Based upon the information provided in Section 3.0 of this document, the proposed revisions to the previously approved Tracy Desalination and Green Energy Project will not result in new significant impacts or substantially increase the severity of impacts previously identified in the IS/MND, and there are no previously infeasible alternatives that are now feasible. Therefore, an Addendum is appropriate, and this Addendum has been prepared to address the environmental effects of the revisions to the project.

### **1.3 CONCLUSIONS**

This addendum addresses the environmental effects associated with the revisions to the Tracy Desalination and Green Energy project that have occurred since certification of the IS/MND and approval of the project on May 1, 2012. The conclusions of the analysis in this Addendum are not substantially different from those made in the IS/MND. The same impacts identified in the IS/MND remain, and have been mitigated to a less-than-significant level, as identified in the IS/MND. No new significant impacts would result, and no substantial increase in the severity of impacts from those previously identified in the IS/MND would occur. This Addendum has been prepared consistent with the requirements of Section 15162 and 15164 of the CEQA Guidelines.

## **2.0 PROJECT DESCRIPTION**

### **2.1 PROJECT LOCATION AND SETTING**

The location and setting of the project has not changed. The project site consists of approximately 241 acres previously located within the City's Sphere of Influence, immediately north of the Tracy City limits. The project site includes APN 212-160-05, APN 212-160-09, and portions of APN 212-160-11. Annexation of the project site into the City of Tracy was approved by the San Joaquin LAFCO on August 17, 2012.

The project site is bounded by Tracy Boulevard to the west, Arbor Avenue and industrial uses to the south, and agricultural lands to the north. Agra Trading, a biomass fuel recycling and trading company, is located on a portion of the project site. The site is bisected by West Sugar Road, which runs in an east-west direction.

The northern and western boundaries of the project site are adjacent to agricultural lands in active agricultural production. The southern boundary of the project site is adjacent to primarily

industrial uses with some commercial uses. These uses include, but are not limited to a mini-storage facility, an equipment rental facility, and automotive repair facilities. The City of Tracy Wastewater Treatment Plant (WWTP) is located immediately southeast of the project site. Lands to the east of the project site are currently used for industrial operations. An existing rail spur is located immediately east of the project site and terminates on the project site.

## 2.2 PROJECT REVISIONS SINCE IS/MND CERTIFICATION

The project analyzed in the December 2011 IS/MND, which was certified on May 1, 2012, consists of a 1.2 MGD desalination plant that would treat treated wastewater from the adjacent Tracy Wastewater Treatment Plant (WWTP) to reduce salinity levels in the treated wastewater. The desalinated wastewater would then be blended back into the remaining treated effluent at the WWTP prior to discharge into the Delta.

The revised project would construct an electrified downer calciner, project code-named "WonderWoman", along with a supporting warehouse/office space for their research and development (R&D) teams. The WonderWoman calciner is an electrified reactor designed to support research and development initiatives aimed at improving the cost-efficiency of CO<sub>2</sub> removal from the atmosphere. The calciner is anticipated to capture approximately 500 to 1,000 tons of CO<sub>2</sub> per year. The calciner would include an approximately 165' tall tower (with a maximum height of no greater than 200' feet tall), and would be surrounded with chain link fence. The footprint of the reactor would be approximately 16' by 16'.

The proposed office/warehouse space associated with the revised project would encompass approximately 5,000 square feet (sf). Some existing temporary buildings would be replaced by this proposed office/warehouse space.

Construction activities associated with the revised project would include:

- Trenching for underground utilities and installing underground utilities;
- Excavating, forming, pouring pads and footings for equipment and potential pipe rack;
- Disconnecting electrical connections to existing rotary kiln (to power the new reactor);
- Installing of pipe rack (extension of existing) and running utilities to reactor and material conveyance;
- Fabricating and installation of structural steel, platforms and roof for the reactor tower;
- Installing of reactor;
- Installing of bulk bag loader/unloader material conveyance for the reactor;
- Running of conveyance lines from the bulk bag loader/unloader to the reactor;
- Connecting final utility connections;
- Installing of a freight elevator and hoist system from ground top of reactor.

The proposed facility would not emit odors, and has been found to be exempt from Rule 2020 by the SJVAPCD. Overall operational emissions are not anticipated to increase from the existing baseline conditions. There would also not be any new noise compared with the existing baseline conditions. Furthermore, it is anticipated that an existing rotary kiln located on-site would be decommissioned and disconnected from power sources, as part of the proposed activities. Up to

a maximum of approximately fifteen new personnel would work on-site. All other aspects of the project would remain unchanged.

## 3.0 ENVIRONMENTAL ANALYSIS

As explained in Chapter 1.0, this comparative analysis has been undertaken pursuant to the provisions of CEQA Guidelines Sections 15162 and 15164 to provide the City with the factual basis for determining whether any changes to the project, any changes in circumstance, or any new information since the IS/MND was certified on May 1, 2012 require additional environmental review or preparation of a Subsequent MND. The environmental analysis and mitigation measures provided in the IS/MND remain current and applicable to the proposed project in areas and aspects of the project unaffected by the project revisions identified in Chapter 2.0 of this Addendum.

### *AESTHETICS*

The proposed project changes would not result in any new or altered impacts with respect to aesthetics and visual resources. Although the proposed project changes would add an approximately 165' tall tower surrounded by a chain link fence, and a proposed office/warehouse space encompassing approximately 5,000 square feet, the proposed project changes would blend into the project already analyzed, and would not generate any new aesthetics impacts. The IS/MND requires the implementation of Mitigation Measure 1, which requires the preparation and implementation of a lighting plan to reduce light spillage and nighttime lighting impacts. This Mitigation Measure would still be required and enforced. No new mitigation measures are required for the project revisions.

### *AGRICULTURAL AND FOREST RESOURCES*

The proposed project changes would not result in any new or altered impacts with respect to agricultural and forest resources. The area of disturbance of the project would not change, and the project would not result in any increased impacts to agricultural lands or resources beyond those addressed in the IS/MND. The project would still be subject to the requirements of Mitigation Measure 2, which requires the payment of Agricultural Mitigation Fees to offset the loss of Prime and Unique Farmland that would occur if the future solar array component of the project were constructed. This Mitigation Measure would still be required and enforced. No new mitigation measures are required for the project revisions.

### *AIR QUALITY*

Potential project impacts associated with air quality emissions from operation of the revised project would be extremely similar to what was already analyzed in the project IS/MND, as a result of the proposed project changes.

The calciner associated with the revised project could require approximately one truck trip each week. Additionally, the calciner could generate an additional fifteen additional worker vehicle trips per day. The addition of these vehicle trips do not constitute a significant increase in air

emissions, nor would it cause any other air quality impact. Additionally, the energy required to power the carbon dioxide removal facilities would be minimal and would not cause or exacerbate any air quality impacts. Compared to the analysis contained in the IS/MND, the project revisions would not result in significant increased impacts to air quality, or cause a substantial increase in the severity of any air quality impacts. No new mitigation requirements are required for the project revisions.

It should also be noted that The proposed facility would not emit odors, and has been found to be exempt from Rule 2020 by the SJVAPCD. According to the SJVAPCD, pursuant to current District Rule 2020, Section 6.19, Low Emitting Units (as defined in Section 3.10 of this rule) are permit exempt provided they pose no significant health risk. As provided by the SJVAPCD in a letter dated August 12, 2024,, at the proposed throughput of 1,931 tons of limestone per year, this operation is expected to meet the Low Emitting Units definition and is not expected to pose a public health risk.

Construction-related emissions would be minimal and would not change when compared to the project addressed in the IS/MND. The revised project would be subject to the requirements of Mitigation Measures 3 and 4, which require the implementation of best management practices for construction and grading activities, as required by SJVAPCD Rule VIII. No new mitigation measures are required for the project revisions.

#### *BIOLOGICAL RESOURCES*

The footprint of the project and the areas proposed for disturbance would not change from the conditions addressed in the IS/MND. As such, no changes to potential impacts to biological resources would occur as a result of the proposed project revisions compared to the potential impacts described in the IS/MND. The IS/MND requires the project to implement Mitigation Measures 5 and 6, which require the project to obtain coverage under the San Joaquin Multi Species Conservation Plan (SJMSCP), and to ensure that construction activities do not adversely impact burrowing owls. These Mitigation Measures would be required by the project revisions and would reduce potential impacts to a less than significant level, as described in the IS/MND. No new mitigation measures are required for the project revisions.

#### *CULTURAL RESOURCES AND TRIBAL CULTURAL RESOURCES*

The footprint of the project and the areas proposed for disturbance would not change from the conditions addressed in the IS/MND. As such, no changes to potential impacts to cultural resources would occur as a result of the proposed project revisions compared to the potential impacts described in the IS/MND. The IS/MND requires the project to implement Mitigation Measure 7, which includes standard measures that must be implemented if a previously unknown cultural or historical resource is encountered during site grading and construction activities. This Mitigation Measure would be required by the project revisions and would reduce potential impacts to a less than significant level, as described in the IS/MND. No new mitigation measures are required for the project revisions.

## *GEOLOGY AND SOILS*

The footprint of the project and the areas proposed for disturbance would not change from the conditions addressed in the IS/MND. As such, no changes to potential impacts to geology and soils would occur as a result of the proposed project revisions compared to the potential impacts described in the IS/MND. The IS/MND requires the project to implement Mitigation Measures 8 and 9, which require the project to implement site-specific geotechnical engineering measures in order to comply with the California Building Code to ensure that structures and foundations are designed to meet stability and safety standards. These Mitigation Measures would be required by the project revisions and would reduce potential impacts to a less than significant level, as described in the IS/MND. No new mitigation measures are required for the project revisions.

## *Greenhouse Gases*

Emissions of greenhouse gases (GHGs) would decrease under the proposed project revisions when compared to the originally proposed project. The proposed project revisions include a carbon dioxide (i.e. greenhouse gas) removal facility (i.e. WonderWoman) that would directly remove carbon dioxide (i.e. greenhouse gases) from the air. Additionally, the facility is anticipated to utilize renewable energy for power. Despite modest increases in vehicle trips associated with the revised project as compared to what was analyzed within the IS/MND, it is anticipated that the carbon removal activities would reduce greenhouse gas emissions greater than the greenhouse gases emitted by project activities, thereby yielding a net greenhouse gas reduction. As such, the proposed project revisions are consistent with Statewide efforts to increase the supply of qualified renewable fuel supplies. Given that the proposed project revisions would result in a decreased level of GHGs generated directly from the project when compared to the original project, and the project revisions are consistent with Statewide plans and efforts to increase the availability of renewable fuels, the project revisions would not increase the severity of impacts related to GHGs and climate change. No new mitigation measures are required for the project revisions.

## *HAZARDS AND HAZARDOUS MATERIALS*

The original project addressed in the IS/MND included the use, storage and transport of hazardous materials regulated under the CalARP program, including anhydrous ammonia for use in the Selective catalytic reduction (SCR) system to reduce emissions of nitrogen oxide gas (NOx).

The IS/MND addressed impacts associated with the use, transport and storage of anhydrous ammonia. Anhydrous Ammonia (ammonia) (CAS No. 7664-41-7) is subject to the California Accidental Release Prevention Program (CalARP) regulations (Title 19, CCR, Chapter 4.5), and is regulated as an “extremely hazards material”. The IS/MND included Mitigation Measure 10, which requires the preparation of a Risk Management Plan (RMP) for the use and storage of anhydrous ammonia that meets the requirements of California Health and Safety Code, Division 20, Chapter 6.95, Article 2 and the California Code of Regulation (CCR) Title 19 Division 2, Chapter 4.5, Articles 1 through 11.

The implementation of Mitigation Measure 10, as described in the IS/MND would ensure that any and all chemicals or hazardous materials used at the project site would comply with applicable

regulations, through the preparation of a Risk Management Plan and/or Hazardous Materials Business Plan. This mitigation measure is included in the IS/MND and would remain applicable in light of the proposed project changes. Therefore, potential impacts associated with hazardous materials would not substantially increase as a result of the proposed project revisions. No new hazards would be associated with the project revisions; no new mitigation measures are required for the project revisions.

#### *HYDROLOGY AND WATER QUALITY*

The proposed project revisions would result in the same area of disturbance, project footprint and grading/drainage improvements as what was addressed in the IS/MND. There would be no changes when compared to the originally proposed project. The IS/MND includes Mitigation Measure 11, which requires the preparation of a Stormwater Pollution Prevention Plan (SWPPP) prior to site grading activities in order to protect surface water quality in the project area. This Mitigation Measures would be required by the project revisions and would reduce potential impacts to a less than significant level, as described in the IS/MND. No new mitigation measures are required for the project revisions.

#### *LAND USE AND PLANNING*

The proposed project revisions would not result in any new or substantially increased impacts related to land use and planning compared to the analysis contained in the IS/MND. The San Joaquin LAFCO has already approved the annexation of the project site into the City of Tracy, and the City has approved the General Plan Amendment to designate the site Industrial and zoned the site Light Industrial. There would be no changes to impacts related to land use and planning beyond those addressed in the IS/MND, and no new mitigation requirements are required for the project revisions.

#### *MINERAL RESOURCES*

The project's footprint and area of disturbance would not change from what was addressed in the IS/MND. The IS/MND determined that the project would not result in any impacts related to mineral resources. No new mitigation measures are required for the project revisions.

#### *NOISE*

There are no existing noise-sensitive land uses adjacent to the project site. The project site is located in an agricultural and industrial area that generally has a relatively high level of ambient background noise throughout the day. The nearest noise sensitive land uses are residences located approximately 0.5 miles to the south of the site.

As described in the IS/MND, the anticipated increase in daily vehicle trips associated with the WWTP would not significantly increase ambient noise levels in the project vicinity and would not result in a violation of any established noise thresholds in the project vicinity.

The revised project would add new activity to the northwest corner of the WWTP project site. The calciner associated with the revised project could require infrequent truck trips. However, such trips are anticipated to only occur approximately once per week. Additionally, the calciner could generate an additional fifteen additional worker vehicle trips per day. However, the

addition of these additional vehicle trips do not constitute a significant increase in noise. Additionally, while the facility itself would generate a small amount of noise, the noise generated would be minimal, and would not affect nearby persons.

Compared to the analysis contained in the IS/MND, the project revisions would not result in significant increased impacts to noise, or cause a substantial increase in the severity of any noise impacts. No new mitigation requirements are required for the project revisions. No new mitigation requirements are required for the project revisions.

#### *POPULATION AND HOUSING*

As described in the IS/MND, implementation of the project would not directly result in population growth, nor would it convert any land use designations to a use that would allow for the construction of housing. The proposed project will not generate a significant number of new jobs which could lead indirectly to population growth. There are no homes or residences currently located on the project site, and therefore, no homes or people would be displaced as a result of project implementation. There would be no change to the analysis contained in the IS/MND and the project revisions would not increase the severity of any impacts related to population and housing. No new mitigation requirements are required for the project revisions.

#### *PUBLIC SERVICES AND RECREATION*

As described in the IS/MND, the project would not result in any impacts related to public services, including police, fire, schools, parks or other public facilities. None of the proposed revisions to the project would result in new public services impacts or increase the severity of any impacts related to public services. Impacts related to this topic would remain unchanged from the analysis in the IS/MND. No new mitigation requirements are required for the project revisions.

#### *TRANSPORTATION AND TRAFFIC*

As described in the IS/MND, the project would not result in any significant impacts to traffic, transportation facilities, or area roadways or intersections. The original project addressed in the IS/MND would have generated approximately 20 truck trips per day associated with biomass fuel deliveries. These trips are anticipated to occur throughout the day, and would not be concentrated during peak travel hours. A worst-case scenario is that the project could generate up to 14 additional vehicle trips in any given hour (nine employee trips and five truck trips).

The calciner associated with the revised project could require approximately one truck trip each week. Additionally, the carbon dioxide removal facility could generate an additional fifteen additional vehicle trips per day. The addition of these vehicle trips do not constitute a significant increase in traffic, nor would it result in a decreased level of service on area roadways or intersections, or cause any other transportation and traffic impact.

Compared to the analysis contained in the IS/MND, the project revisions would not result in significant increased impacts to the area transportation network, or cause a substantial increase in the severity of any transportation and traffic impacts. No new mitigation requirements are required for the project revisions.

***UTILITIES AND SERVICE SYSTEMS***

As described in the IS/MND, the project would not result in any impacts related to utility services, including water, sewer, drainage, or solid waste. None of the proposed revisions to the project would result in new utilities impacts or increase the severity of any impacts related to utilities. Impacts related to this topic would remain unchanged from the analysis in the IS/MND. No new mitigation requirements are required for the project revisions.

**CONCLUSIONS**

Based on the information provided above, the proposed project revisions would not result in an increase of impacts to any environmental topic previously addressed in the IS/MND, nor would the project result in new environmental impacts that were not previously addressed in the IS/MND.

Based on the evidence included in this Addendum, the proposed project, as described in Chapter 2.0, would not result in a substantial change in the conclusions and analysis included in the IS/MND, which was adopted by the Tracy City Council on May 1, 2012.

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