

INITIAL STUDY / NOTICE OF PREPARATION

FOR THE

PARADISE POINTE BUSINESS PARK PROJECT

MAY 2025

Prepared for:

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

Prepared by:

De Novo Planning Group
1020 Suncast Lane, Suite 106
El Dorado Hills, CA 95762
(916) 949-3231

D e N o v o P l a n n i n g G r o u p

A Land Use Planning, Design, and Environmental Firm

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INITIAL STUDY CHECKLIST

PROJECT TITLE

Paradise Pointe Business Park Project

LEAD AGENCY NAME AND ADDRESS

City of Tracy
Planning Division
333 Civic Center Plaza
Tracy, CA 95376

CONTACT PERSON AND PHONE NUMBER

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PROJECT SPONSOR'S NAME AND ADDRESS

Attention: Michael Diepenbrock
Ridge Tracy Land Partners No. 2, LLC
601 University, Suite 180
Sacramento, CA 95825

PROJECT OVERVIEW

PROJECT LOCATION

The Project site consists of approximately 52.7 acres located at the northwest corner of Chrisman Road and Paradise Avenue in the northeast quadrant of the City of Tracy, adjacent to State Route 205 (SR-205) to the north. The Project site is located on Assessor Parcel Numbers (APNs) 213-06-012 and 213-06-013. The project's location is shown in Figure 1.

PROJECT SITE DEFINED

The Project site includes three distinct planning boundaries defined below. The following terms are used throughout this document to describe the planning boundaries within the Project site:

- **Project Site** – totals 52.7 acres and includes the whole of the Project, including the Remediation Area and the Development Area.
- **Development Area** – includes approximately 52.3 acres which would be developed with two (2) industrial warehouse type uses as part of the Project.
- **Remediation Area** – includes approximately 10.2 acres along the southern site boundary which contains soils that will be removed and remediated as part of the Project. Following remediation, the Remediation Area will be developed as part of the Development Area with two industrial warehouse type uses; and a portion of the

Remediation Area will be dedicated to the City of Tracy for the future extension of Chrisman Road.

EXISTING SITE USES

The majority of the Project site is currently agricultural land (Development Area), with an approximately 10.2-acre strip of vacant land that was previously used as a crop-dusting airstrip, as discussed further below. The approximately 10.2-acre portion of the Project site that is slated for remediation (Remediation Area) is generally void of vegetation. The existing vegetation in the Remediation Area appears to have burned in the past. There are also remnant concrete slabs and other concrete structures that are associated with the former airstrip in the southeastern corner of the Project site. An existing pump station with a screen wall and a catch basin are currently located on the south side of the project adjacent to the roadway access point along Chrisman Road at the southeast corner of the Project site.

The approximately 10.2-acre soil Remediation Area was previously an agricultural airstrip from 1951 to roughly 1989. This airstrip engaged in frequent crop dusting of surrounding agricultural uses, leading to significant soil contamination that requires remediation, as discussed above. Following the 1980s the site was reportedly occupied by various businesses including a trucking company, tomato packing company, and a truck repair company. The property was seemingly destroyed by a fire in 2018 and has remained vacant. Figure 3 shows an aerial view of the entire Project site, including the Development Area and the Remediation Area.

SURROUNDING LAND USES

The Project site is located in an industrial area within the City's Northeast Industrial Specific Plan area. The surrounding area adjacent to the Project site includes light industrial, agricultural areas, and SR-205. The Project site and the areas to the north, east, south, and west are designated Industrial by the City's General Plan. The area to the northeast, north of SR-205, is designated for agricultural land uses by San Joaquin County. The City of Tracy has zoned the parcels to the west as light industrial (M-1) and the parcels to the south as Northeast Industrial Specific Plan Zone (NEI).

PROJECT DESCRIPTION

The proposed project would include development of two general light industrial warehouse buildings totaling 718,165 square feet (sf). Building A would be 466,977 sf and Building B would be 251,188 sf. One-hundred-and-six dock doors would be located along the east and west sides of Building A (38 dock doors on each side) and the east side of Building B (30 dock doors).

Figure 2 displays the proposed site plan layout for the Development Area. Parking would be provided throughout the Development Area, including 322 automobile stalls, 247 trailer stalls, and 22 bicycle parking stalls. Landscaping, including trees, street frontage plantings, accent shrubs and groundcover plantings, native shrub and grass mixes, and screening shrubs would be provided throughout the Development Area. Temporary landscaping would be placed between Building B and Chrisman Road. An exterior amenity area for employees would be included in the northern portion of the Development Area between the proposed warehouse buildings. The

amenity area would include outdoor seating, picnic areas, bike parking, and landscaping. The eastern-most corner of the Project site will continue to be utilized as agricultural land until future roadway improvements are completed (by others).

Best Management Practices

The Project would incorporate the following sustainability features:

Construction

- Time limitations for off-road diesel-powered equipment will be implemented during construction. Each piece of off-road diesel-powered equipment used during project construction will be prohibited from being in the “on” position for more than 10 hours per day.
- Tier IV-compliant engines or better will be used for all off-road construction vehicles/equipment.
- Through the use of construction worker training and/or signage, applicant(s) will limit heavy duty construction equipment idling to no more than 2 minutes, and in no instance shall such idling exceed 5 minutes, and will maintain vehicle speeds on unpaved roads to less than 15 miles-per-hour (mph).
- Electric hookups will be provided to reduce the need for diesel generators for electric construction equipment and, should diesel generators be needed, all such diesel generators will be equipped with emission control technology verified by Environmental Protection Agency (EPA) and/or California Air Resources Board (CARB) to reduce particulate matter (PM) emissions by a minimum of 85 percent.
- All construction diesel hauling trucks will be model year 2010 or later.
- On-site meal options will be provided for construction workers.

Site

- A substantial amount of the proposed plant material used for landscaping and stormwater features will be native and drought tolerant and will use less water than other common species. Site perimeter and parking lot landscaping will provide vegetated buffers that will include trees, tree canopies and other vegetation.
- Irrigation systems for new facilities will include the use of deep root watering bubblers for parking lot trees to minimize water usage and ensure that water goes directly to the intended planting areas.
- Storm water management plans are designed to maintain quality control and storm water discharge rates based on the City’s requirements.
- Dust, tire wear, brake dust and other parking lot contaminants will be minimized through regular sweeping/cleaning of parking lots.
- Electrical vehicle charging stations will be provided per code.

Building

- All truck entries will be located on designated truck routes.
- New and renewable building materials are typically extracted and manufactured within the region. Materials such as concrete and concrete masonry units will be purchased locally to the project, minimizing the transport distances and resultant effects to road networks and regional air quality.
- All building roofs will have a minimum Solar Reflectance Index of 0.80, lessening heat gain. Reflective cool roof materials are used to lower heat absorption, subsequently lowering energy requirements during the hot summer months. Roof material will meet the requirements for EPA's Energy Star energy efficiency program. Building management systems will monitor performance and energy usage of HVAC systems.
- HVAC comfort systems will be controlled by a computerized building management system to maximize efficiency. HVAC units will be high efficiency units.
- Mechanical systems are site specifically commissioned and designed and field tested to ensure that the HVAC systems are performing to high efficiency standards. HVAC systems will be all-electric and will use High Efficiency Particulate Air (HEPA) filters.
- To facilitate the installation of future electric charging stations for heavy-heavy duty (HHD) trucks, the plans will identify an area for future HHD truck charging stations and the developer will install conduit from the power source to the identified area.
- High-efficiency restroom fixtures will be used, which conserves water by achieving a 40 percent decrease over U.S. standards.
- Each applicant, prior to issuance of a building permit for vertical construction in connection with a specific individual development proposal, shall submit language to the City for inclusion in future lease provisions that reflects a prohibition on diesel-powered generators during project operation unless and until any additional required CEQA review is conducted.
- Overall, the site's building energy efficiency will exceed Title 24 Building Envelope Energy Efficiency Standards by at least 1 percent.
- All appliances to be installed will meet or exceed Title 24 requirements.
- All building coatings and paints will be low-VOC coatings.
- Gas water heaters will be direct vent and 94 percent efficient or greater.
- Construction waste will be recycled whenever feasible.
- Lighting systems will be designed with employee controllability in mind. Lighting will be controlled by timers, but over-ride switches will be provided for employee use.

Operations

- Anti-idling signs indicating a 3-minute diesel truck engine idling restriction shall be posted at the project facilities along entrances to the project site and in the dock areas.
- All exclusively onsite vehicles (i.e., forklifts, yard goats, pallet jacks, etc.) will be electric or zero-emission vehicles.
- Bicycle parking will be provided, per the City of Tracy code.

- During project operations, each building manager shall use diligent and good faith efforts to encourage at least two food truck vendors to serve project employees by inviting available vendors on-site on a regular basis.
- Building organic waste (i.e., green waste, wood waste, food waste and fibers such as paper and cardboard) will be recycled to the maximum extent possible and in full compliance with Senate Bill 1383.

Additional Best Management Practices

- Each applicant, in connection with the construction of the relevant specific individual development proposal, shall provide information on available transit and ridesharing programs and services to construction employees.
- Owners, operators or tenants shall enroll and participate the in SmartWay program for eligible businesses, which is a voluntary public-private program developed by the U.S. EPA that provides a system for tracking, documenting and sharing information about fuel use and freight emissions across supply chains and helps companies identify and select more efficient carriers, transportation modes, and equipment; this requirement shall apply to vehicles owned and controlled by the Project owners, operators or tenants.
- Owners, operators or tenants shall ensure that any outdoor areas allowing smoking are at least 25 feet from the nearest property line.
- Buildings shall achieve LEED Certification and meet the California Green Building Standards Code.

SOIL REMOVAL AND REMEDIATION

In addition to the proposed industrial warehouses and supportive circulation, parking, and utility improvements, the project includes remediation of the approximately 10.2-acre Remediation Area in the southern portion of the Project site. The soil remediation will occur prior to development of the industrial uses.

The area that will undergo soil remediation (referred to as “Remediation Area”) is an approximately 10.2-acre site along the southern boundary of the larger 52.7 Project site, as shown in Figure 3. Investigation into past research of the site included a past soil and groundwater sampling study performed in conjunction with a Preliminary Endangerment Assessment (PEA) in 2006, a PEA Addendum in 2006 that revealed significant pesticide impacts to soils at the Remediation Area, a Phase I Environmental Site Assessment (ESA) in 2020, and a follow-up Phase II ESA in 2020 that included a groundwater investigation, a geophysical survey, and an extensive soil sampling and characterization study.

The 2020 Phase I ESA revealed that previous land uses for the site included an agricultural airstrip and crop-dusting facility, indicating a potential for contamination. The 2020 Phase I ESA for the Remediation Area showed that there were previously two underground fuel storage tanks (USTs) that were removed in 1990. Further research indicated that additional USTs may have been located on the site, beyond the two that were removed. The potential for contamination

from UST is a recognized environmental condition and necessitated additional study through a Phase II ESA.

A geophysical study undergone in 2020 revealed that no additional USTs, nor any former septic tanks locations, were found on the Remediation Area. A groundwater study indicated that pesticides were located at the Remediation Area, per the conclusions of the 2006 PEA; however, the groundwater investigation report submitted to the Central Valley Regional Water Quality Control Board (CVRWQCB) stated no further action nor remediation is necessary. A soil study in the same year concluded that there were organochloride pesticides present in the tested samples that were above the Environmental Screening Levels (ESLs) for dichlorodiphenyldichloroethane (DDD), dichlorodiphenyldichloroethylene (DDE), dichlorodiphenyltrichloroethane (DDT), and toxaphene. Other chemicals that were tested for included petroleum hydrocarbons and volatile organic compounds (VOCs); however, these tested below the ESLs. Testing for metals showed that only three samples tested above ESLs for lead and planned remediation measures would be sufficient in removing the identified soil contaminants.

Remedial soil excavation is proposed for the areas where organochlorine pesticide and metals concentration exceeded commercial/industrial ESL values to adequately remove contaminants before development of the proposed project can begin. The remedial work will be performed by a licensed hazardous materials contractor in accordance with all applicable laws and regulations. Prior to initiation of any remedial soil extraction work, the property owner or remediation contractor will obtain any required permits, including a grading permit if necessary. The owner or contractor will also determine whether a Dust Control Plan is required for the remedial work and will process one, if necessary, per San Joaquin Valley Air Pollution Control District (SJVAPCD) regulations. Stormwater controls will also be implemented as necessary to prevent any surface water or storm water that contacts exposed impacted soils from discharging from the work site or from entering storm drain or sewer systems.

Following soil excavation activities, soil samples will be collected from the limits of the soil excavation areas to verify that soils at the limits of the excavation do not contain contaminants above the clean-up levels established. Stockpiled soil samples will also be taken and tested to determine appropriate disposal methods. Once testing of removed soils is completed, all equipment that comes into contact with impacted soils would be decontaminated. The extent of future backfilling of the remedial excavations is unknown and will depend to some degree on the grading details of the development project. Much of the excavation area is anticipated to be only one-foot deep and may not necessitate backfilling.

Based on the planned remedial soil removal work, it is anticipated that remaining onsite soils will not contain the chemicals of concern at concentrations above commercial/industrial ESL values. As such, no ongoing maintenance at the Remediation Area will be necessary following successful completion of remediation work.

GENERAL PLAN AND ZONING DESIGNATIONS

The Tracy General Plan land use designation for the Project site is Industrial (consistent with the proposed project) and the site is within the Northeast Industrial Specific Plan Area. Specific uses

allowed in the Industrial land use designation category range from flex/office space to manufacturing to warehousing and distribution. According to the City's General Plan, Industrial parcels should have a maximum floor-area-ratio (FAR) of 0.5. Building A has an FAR of 0.47 while Building B has an FAR of 0.20. The average FAR of the project would be 0.34, staying below the maximum FAR of 0.5. Industrial uses are located to provide proper truck access, buffering from incompatible uses and proximity with rail corridors and transit links. Figure 4 displays the General Plan land use designation for the Project site and surrounding area.

The Project site is currently zoned Northeast Industrial Specific Plan. The Northeast Industrial Specific Plan addresses 870 acres in the northeast corner of the City. Anticipated land uses include a mixture of manufacturing, warehousing, and distribution uses including rail-dependent industries and "flex-tech" light industrial. Figure 4 also displays the zoning designation for the Project site and surrounding area.

REQUESTED ENTITLEMENTS AND OTHER APPROVALS

The City of Tracy is the Lead Agency for the proposed project, pursuant to the State Guidelines for Implementation of CEQA (Guidelines Section 15050).

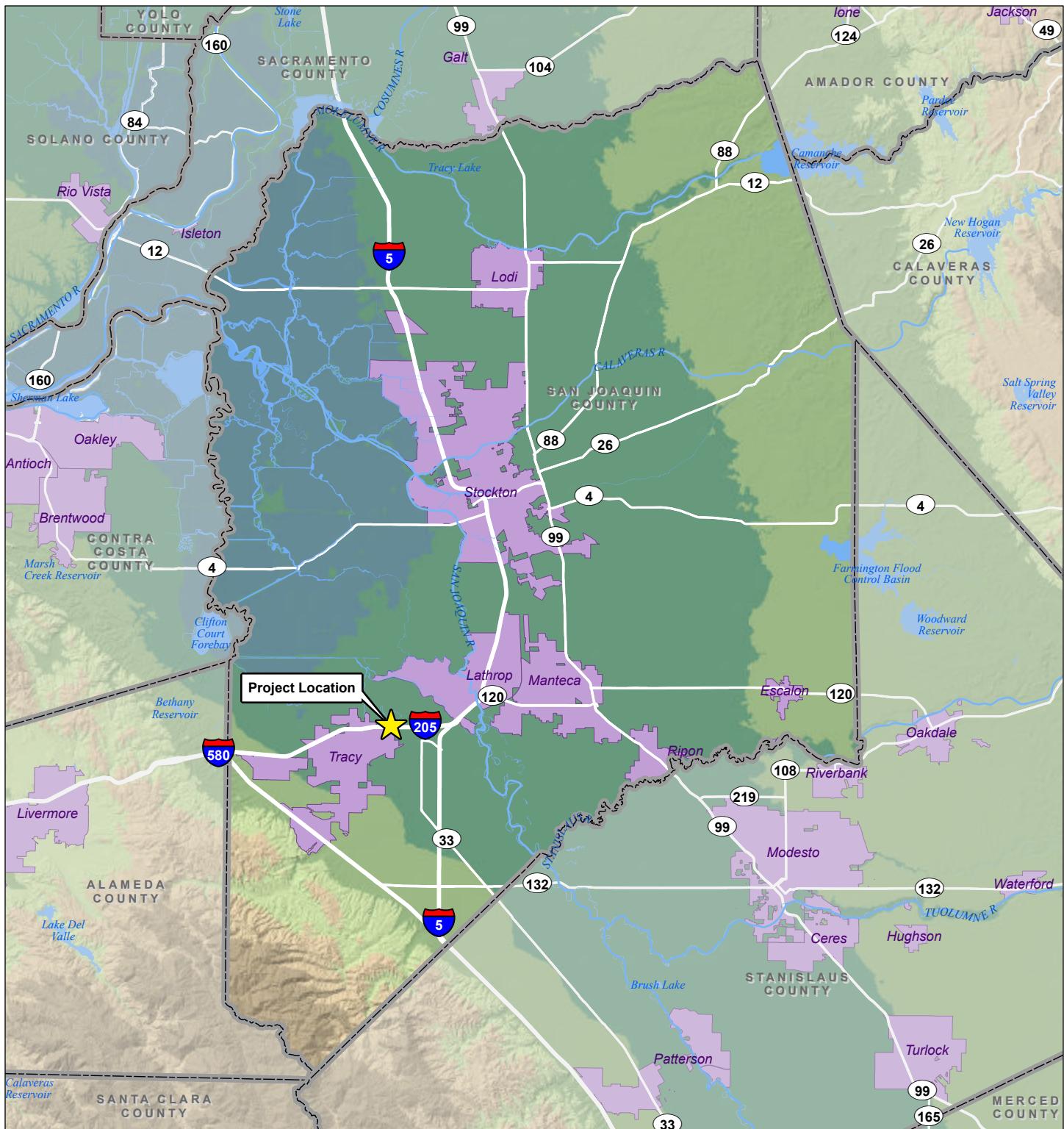
This document will be used by the City of Tracy to take the following actions:

- Development Review;
- Variance from the I-205 Overlay Zone land use and building siting requirements;
- Approval of the Site Plan;
- Building, grading, and other permits as necessary for project construction;
- Adopting a Mitigation Monitoring and Reporting Program (MMRP); and
- Adoption of a Statement of Overriding Considerations (should any significant and unavoidable impacts result from the project).

The following agencies may be required to issue permits or approve certain aspects of the proposed project:

- Central Valley Regional Water Quality Control Board (CVRWQCB) - Storm Water Pollution Prevention Plan (SWPPP) approval prior to construction activities.
- San Joaquin Valley Air Pollution Control District (SJVAPCD) - Approval of construction-related air quality permits.
- San Joaquin Council of Governments (SJCOC) - Review of project application to determine consistency with the San Joaquin County Multi-Species Habitat, Conservation, and Open Space Plan (SJMSCP).

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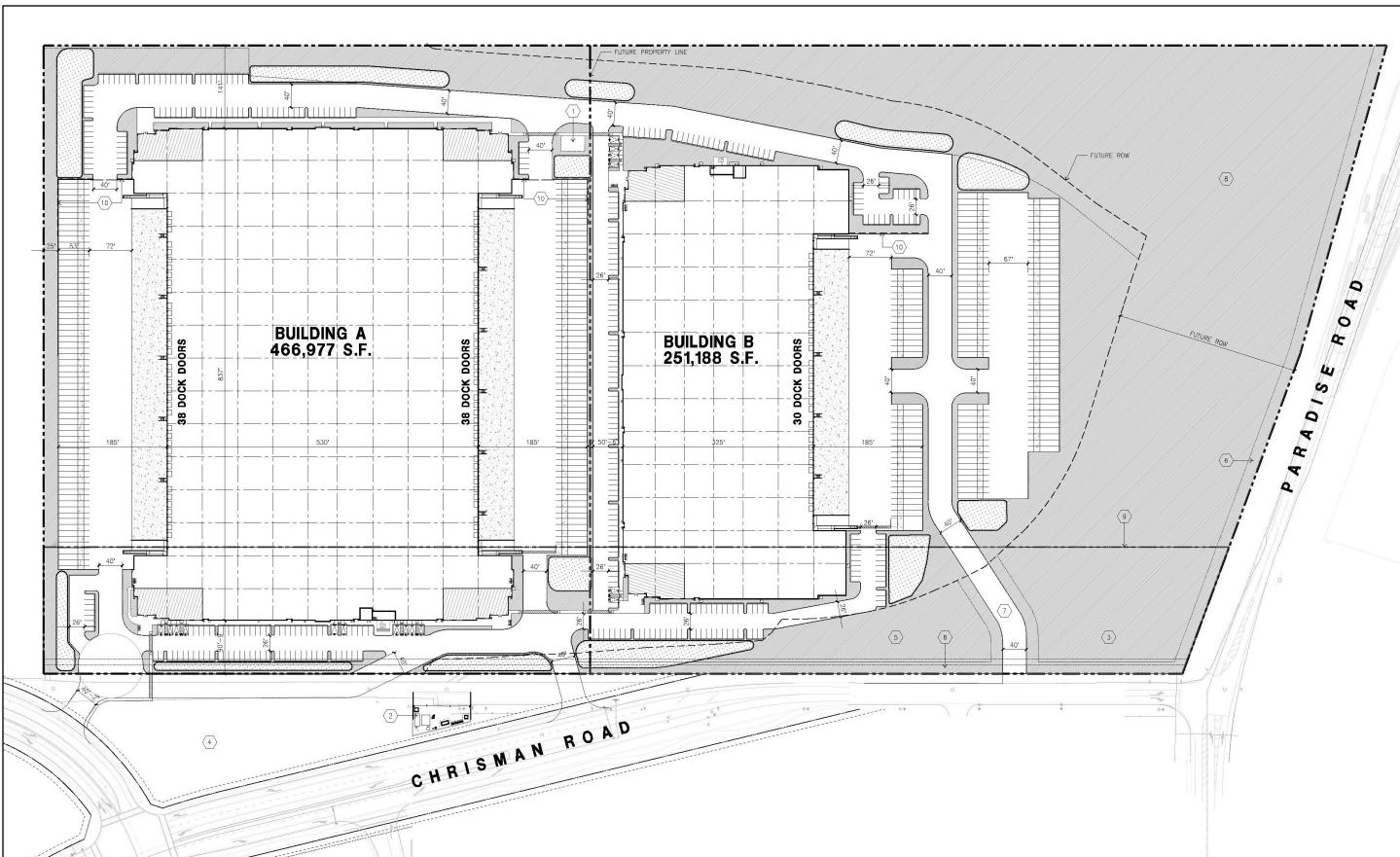
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- Incorporated Area
- County Boundary

Figure 1. Regional Project Location



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PROJECT DATA

	BLDG. A	BLDG. B	TOTAL
SITE AREA			
in s.f.	994,005	1,275,456	2,269,461 s.f.
in acres	22.8	29.3	52.1 ac
BUILDING AREA			
office	10,000	7,000	17,000 s.f.
warehouse	456,977	244,188	701,165 s.f.
TOTAL	466,977	251,188	718,165 s.f.
FLOOR AREA RATIO			
maximum	0.50	0.50	
actual	0.47	0.20	
AUTO PARKING REQUIRED			
office @ 1/250 s.f.	40	28	68 stalls
warehouse 1st 20K @ 1/1,000 s.f.	20	20	40 stalls
2nd 20K @ 1/2,000 s.f.	10	10	20 stalls
above 40K @ 1/4,000 s.f.	104	51	155 stalls
TOTAL	174	109	283 stalls
AUTO PARKING PROVIDED			
Standard (9' x 18'-6")	148	174	322 stalls
Total Accessible Parking			
Accessible parking (9' x 18'-6")	4	2	6 stalls
Accessible Van (9' x 18'-6" + 5' Aisle)	4	2	6 stalls
Total Clean air/ Van pool (12%)			
Standard Clean Air Parking (2%)	4	4	8 stalls
Total EV Charging (10%)			
Standard EV Charging	16	18	34 stalls
Accessible Standard EV Charging	1	1	2 stalls
Accessible Van EV Charging	1	1	2 stalls
Accessible EV Ambulatory	0	0	0 stalls
TOTAL	177	202	379 stalls
TRAILER PARKING PROVIDED			
trailer (10'x58')	126	121	247 stalls
BICYCLE PARKING REQUIRED			
Short term (5% of total stalls)	9	11	20 stalls
Long term (5% of total stalls)	9	11	20 stalls
BICYCLE PARKING PROVIDED			
Short term (5% of total stalls)	10	12	22 stalls
Long term (5% of total stalls)	10	12	22 stalls
ZONING ORDINANCE FOR THE CITY			
Zoning Designation - Northeast Industrial Specific Plan			
SETBACKS			
Building	Landscape		
front / Street - 25'	15'		
side & rear (non street) - 15'	5'		

SITE PLAN KEYNOTES

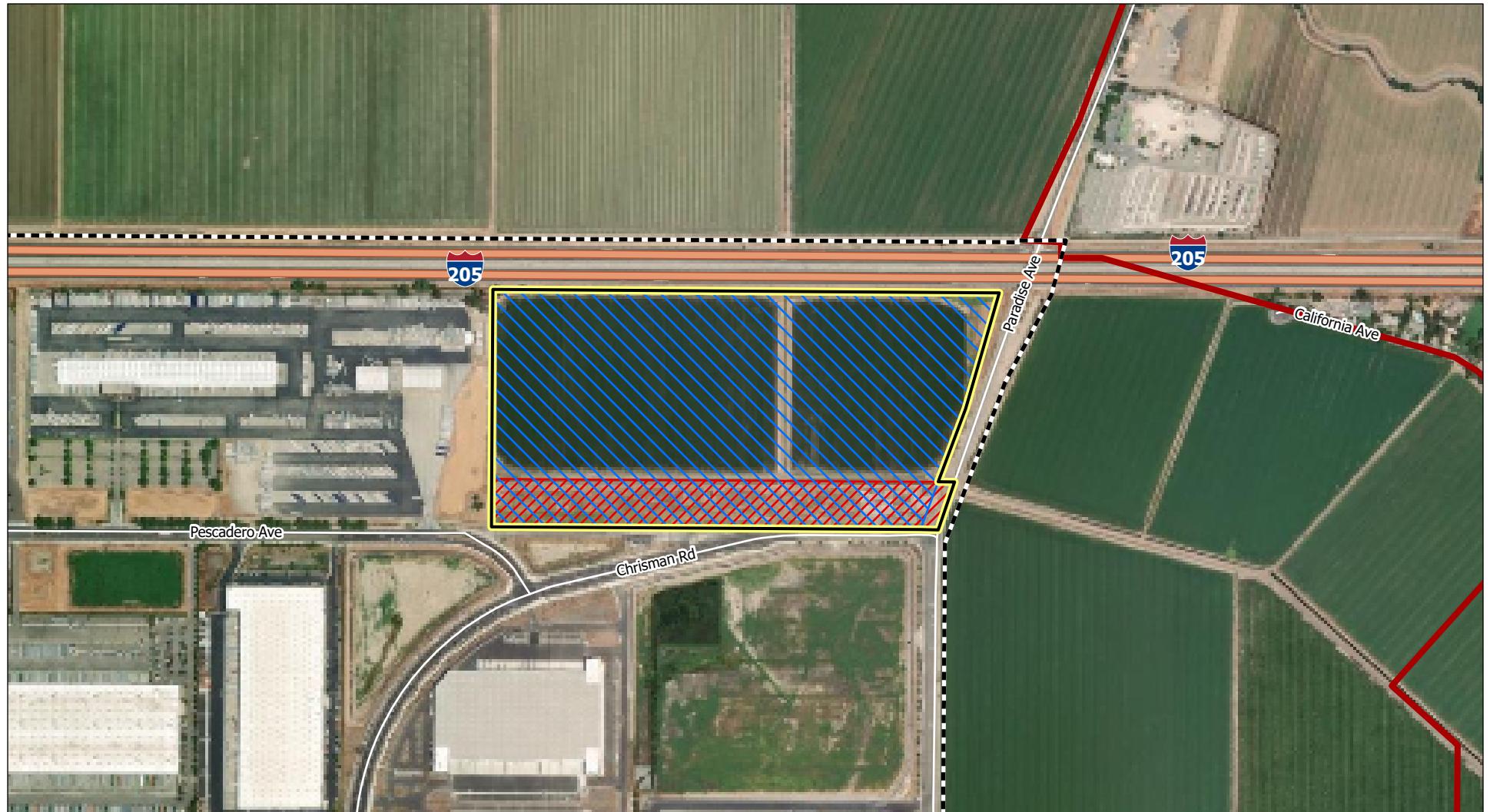
- 1 EXTERIOR AMENITY AREA
- 2 (E) PUMP STATION WITH SCREEN WALL
- 3 FUTURE PUBLIC ART
- 4 BASIN BY SEEFRID DEVELOPMENT
- 5 TEMPORARY LANDSCAPE
- 6 TEMPORARY PERIMETER LANDSCAPING
- 7 TEMPORARY ACCESS; FULL MOVEMENT INTERSECTION, SEE CIVIL DWG
- 8 THIS AREA WILL CONTINUE TO BE FARMED UNTIL THE FUTURE ROAD IMPROVEMENTS ARE CONSTRUCTED
- 9 EXISTING PARCEL LINE
- 10 EXTEND OF SCREEN WALL, SEE SCREEN WALL EXHIBIT

PARADISE POINTE BUSINESS PARK

Figure 2. Site Plan



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LEGEND

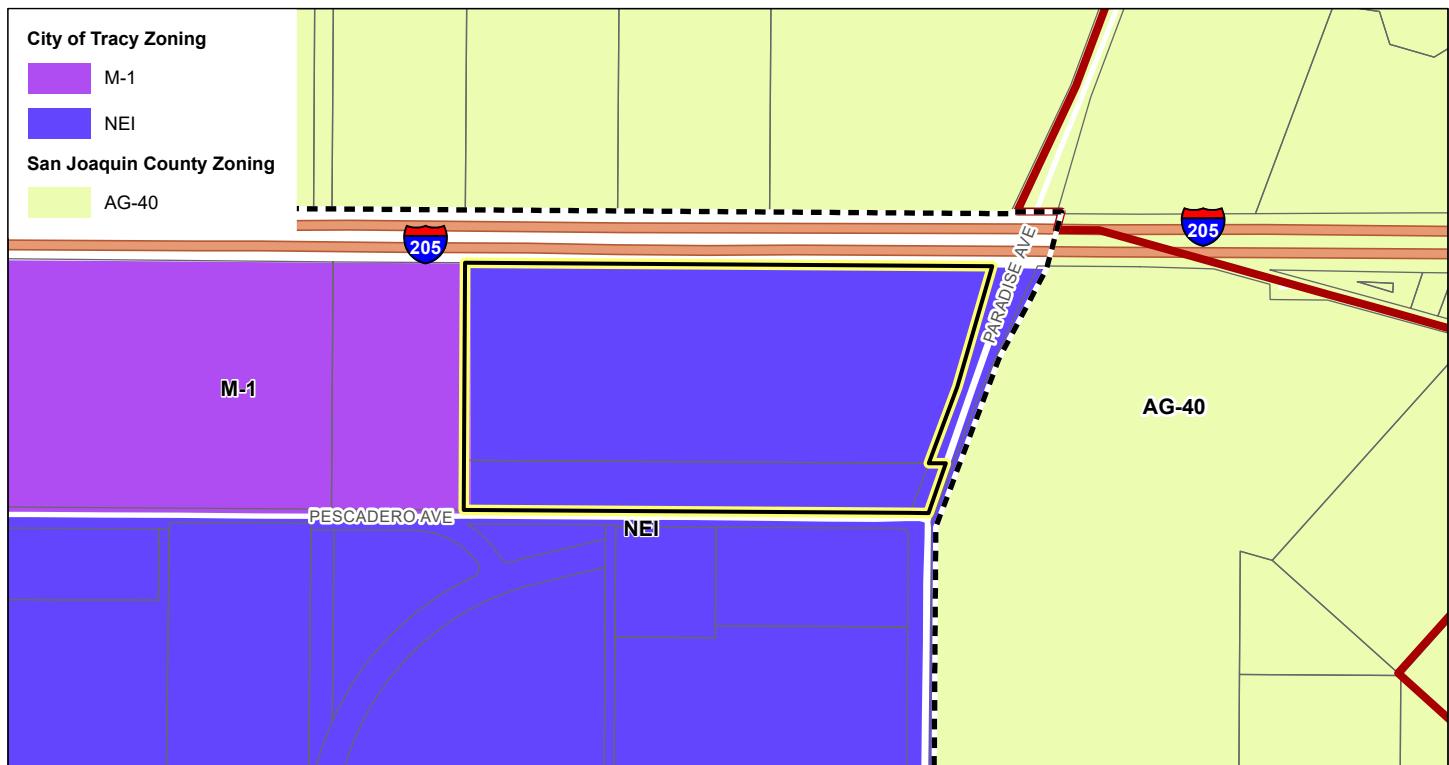
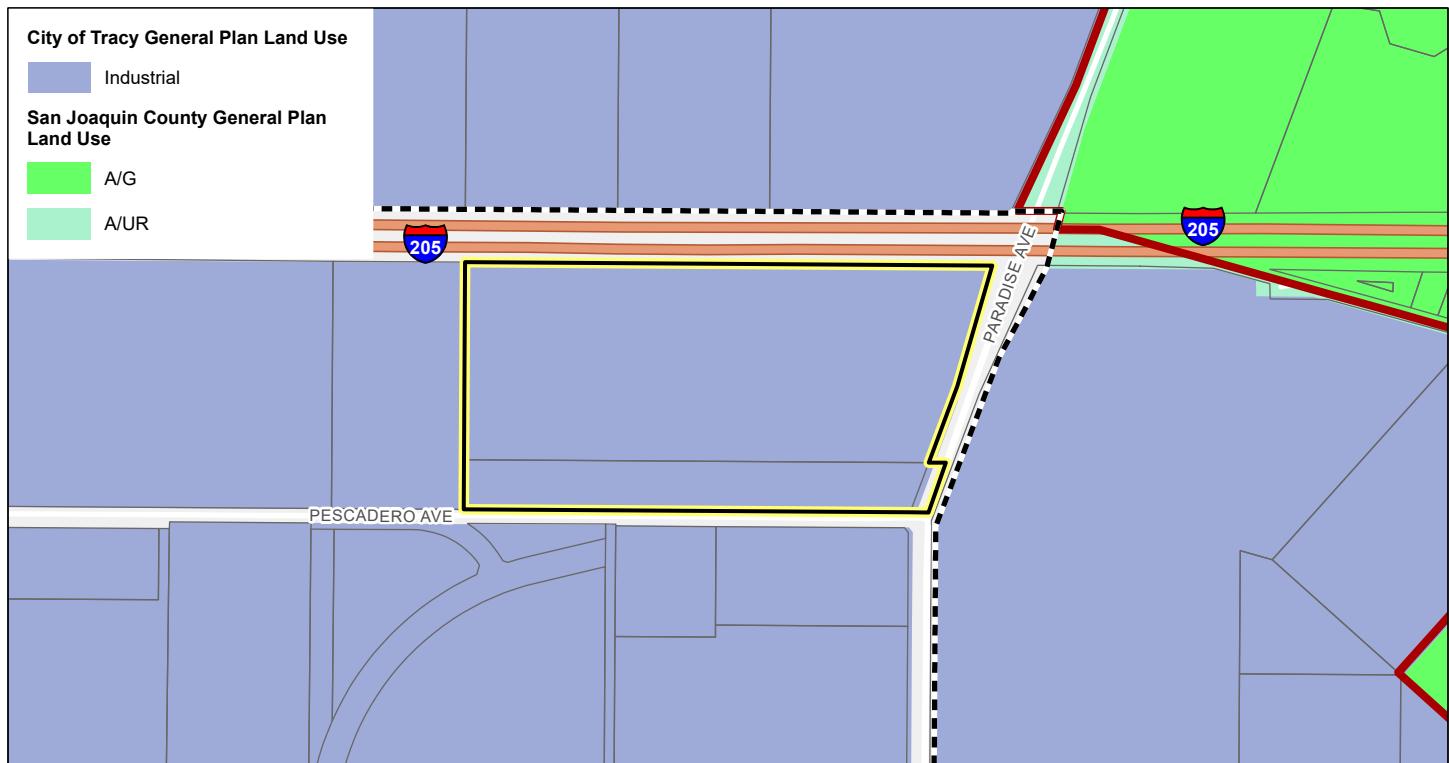
- Project Site
- Tracy City Limits
- Development Area
- Tracy SOI
- Remediation Area

PARADISE POINTE BUSINESS PARK

Figure 3. Aerial View



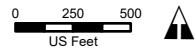
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LEGEND

- Project Site (Yellow Box)
- Tracy City Limits (Dashed Line)
- Tracy SOI (Red Box)

Figure 4. Land Use and Zoning Designations



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ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

	Aesthetics		Agriculture and Forestry Resources	X	Air Quality
	Biological Resources		Cultural Resources	X	Energy
	Geology and Soils	X	Greenhouse Gasses		Hazards and Hazardous Materials
	Hydrology and Water Quality		Land Use and Planning		Mineral Resources
X	Noise		Population and Housing		Public Services
	Recreation	X	Transportation		Tribal Cultural Resources
	Utilities and Service Systems		Wildfire		Mandatory Findings of Significance

DETERMINATION

On the basis of this initial evaluation:

	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
X	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Victoria Lombardo

5/15/2025

Signature

Date

EVALUATION INSTRUCTIONS

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significant.

EVALUATION OF ENVIRONMENTAL IMPACTS

In each area of potential impact listed in this section, there are one or more questions which assess the degree of potential environmental effect. A response is provided to each question using one of the four impact evaluation criteria described below. A discussion of the response is also included.

- Potentially Significant Impact. This response is appropriate when there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant Impact" entries upon completion of the Initial Study, an EIR is required.
- Less than Significant With Mitigation Incorporated. This response applies when the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact". The Lead Agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level.
- Less than Significant Impact. A less than significant impact is one which is deemed to have little or no adverse effect on the environment. Mitigation measures are, therefore, not necessary, although they may be recommended to further reduce a minor impact.
- No Impact. These issues were either identified as having no impact on the environment, or they are not relevant to the project.

ENVIRONMENTAL CHECKLIST

This section of the Initial Study incorporates the most current Appendix "G" Environmental Checklist Form contained in the CEQA Guidelines. Impact questions and responses are included in both tabular and narrative formats for each of the 21 environmental topic areas.

I. AESTHETICS -- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			X	
c) In non-urbanized areas, 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 the applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?		X		

RESPONSES TO CHECKLIST QUESTIONS

Response a): Less than Significant. There are no scenic vistas located on or adjacent to the Project site. The proposed project uses are consistent and compatible with the surrounding land use designations. Lands surrounding the Project site consist of industrial and residential uses.

Implementation of the proposed project would provide for additional industrial development on a Project site that is bordered by similarly scaled industrial development to the south and west, with agricultural land uses to the north and east, as described above. The Project site is not topographically elevated from the surrounding lands and is not highly visible from areas beyond the immediate vicinity of the site, except for the nearby SR-205. However, the proposed industrial buildings are within the same character as the buildings adjacent to it. There are no prominent features on the site, such as trees, rock outcroppings, or other visually distinctive features that contribute to the scenic quality of the site or conflict with the existing visual character of the site and the nearby land uses. The Project site is not designated as a scenic vista by the City of Tracy General Plan.

Implementation of the proposed project would not significantly change the existing visual character of the project area, as much of the areas immediately adjacent to the site are used for

industrial purposes. There are no residential or commercial uses directly adjacent to, or near, the site that will be impacted by the addition of two light industrial buildings to an area already consisting of industrial land uses.

Implementation of the proposed project would introduce an industrial warehouse development to the project area that would be generally consistent with the surrounding industrial developments. Therefore, this impact is considered **less than significant**.

Response b): Less than Significant. As described in the Tracy General Plan EIR, there are two Officially Dedicated California Scenic Highway segments in the Tracy Planning Area, which extend a total length of 16 miles. The first designated scenic highway is the portion of Interstate (I) 580 between SR-205 and I-5, which offers views of the Coast Range to the west and the Central Valley's urban and agricultural lands to the east. The second scenic highway is the portion of I-5 that starts at SR-205 and continues south to Stanislaus County, which allows for views of the surrounding agricultural lands and the Delta-Mendota Canal and California Aqueduct.

The scenic portion of the I-580 highway is approximately 9.5 miles east from the Project site. The Project site is not visible from this highway. Additionally, the project is not at all visible along any scenic section of I-5.

Development of the proposed project would not result in the removal of any substantial trees, rock outcroppings, or buildings of historical significance, and would not result in changes to any of the viewsheds from the designated scenic highways in the vicinity of the City of Tracy. Therefore, there is a **less than significant** impact.

Response c): Less than Significant. As described under Response a), above, the proposed project would add additional industrial uses to an area that currently contains numerous industrial uses surrounding the site and agricultural uses to the north and east. The proposed project would be visually compatible with the surrounding industrial land uses and would not significantly degrade the existing visual quality of the site or the surrounding area. Additionally, the project will comply with City standards, including, but not limited to, the City's Design Goals and Standards, which would ensure that the exterior facades of the proposed industrial structures, streetscape improvements, and exterior lighting improvements are compatible with the surrounding land uses. This is a **less than significant** impact.

Response d): Less than Significant with Mitigation. Daytime glare can occur when the sunlight strikes reflective surfaces such as windows, vehicle windshields, and shiny reflective building materials. The proposed project would introduce a new industrial warehouse structure into the Project site; however, reflective building materials are not proposed for use in the project, and as such, the project would not result in increases in daytime glare.

The proposed project would include exterior lighting around the structures, and landscaped areas within the site. The City of Tracy Standard Plan #140 establishes street light standards, and requirements for light illumination. Additionally, the Northeast Industrial Specific Plan contains design guidelines and development standards to guide site planning and architecture within the Specific Plan area. The Northeast Industrial Specific Plan design guidelines contain

provisions for street lighting. The City addresses light and glare issues on a case-by-case basis during project approval and typically adds requirements as a condition of project approval to shield and protect against light spillover from one property to the next. The implementation of City standards and requirements would reduce any impacts related to light and glare to a **less than significant** level.

Mitigation Measure(s)

Mitigation Measure AES-1: *A lighting plan shall be prepared in accordance with the City of Tracy Standard Plan #140 that establishes street light standards, and requirements for light illumination, and the Tracy Northeast Industrial Specific Plan design guidelines. The lighting plan shall include the following:*

- *Design of site lighting and exterior building light fixtures to reduce the effects of light pollution and glare off of glass and metal surfaces;*
- *Lighting shall be directed downward and light fixtures shall be shielded to reduce upward and spillover lighting.*

II. AGRICULTURE AND FOREST RESOURCES -- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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?			X	
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 1222(g)) or timberland (as defined in Public Resources Code section 4526)?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
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?				X

RESPONSES TO CHECKLIST QUESTIONS

Response a): Less than Significant. According to the Farmland Mapping and Monitoring Program and the California Department of Conservation, the Remediation Area is designated as Farmland of Local Importance and the Development Area is designated as Prime Farmland. Figure 5 identifies important farmlands, as mapped by the California Department of Conservation, on and near the Project site. Due to the existing surrounding land uses, the Project site is not suitable for agricultural production and agricultural operations.

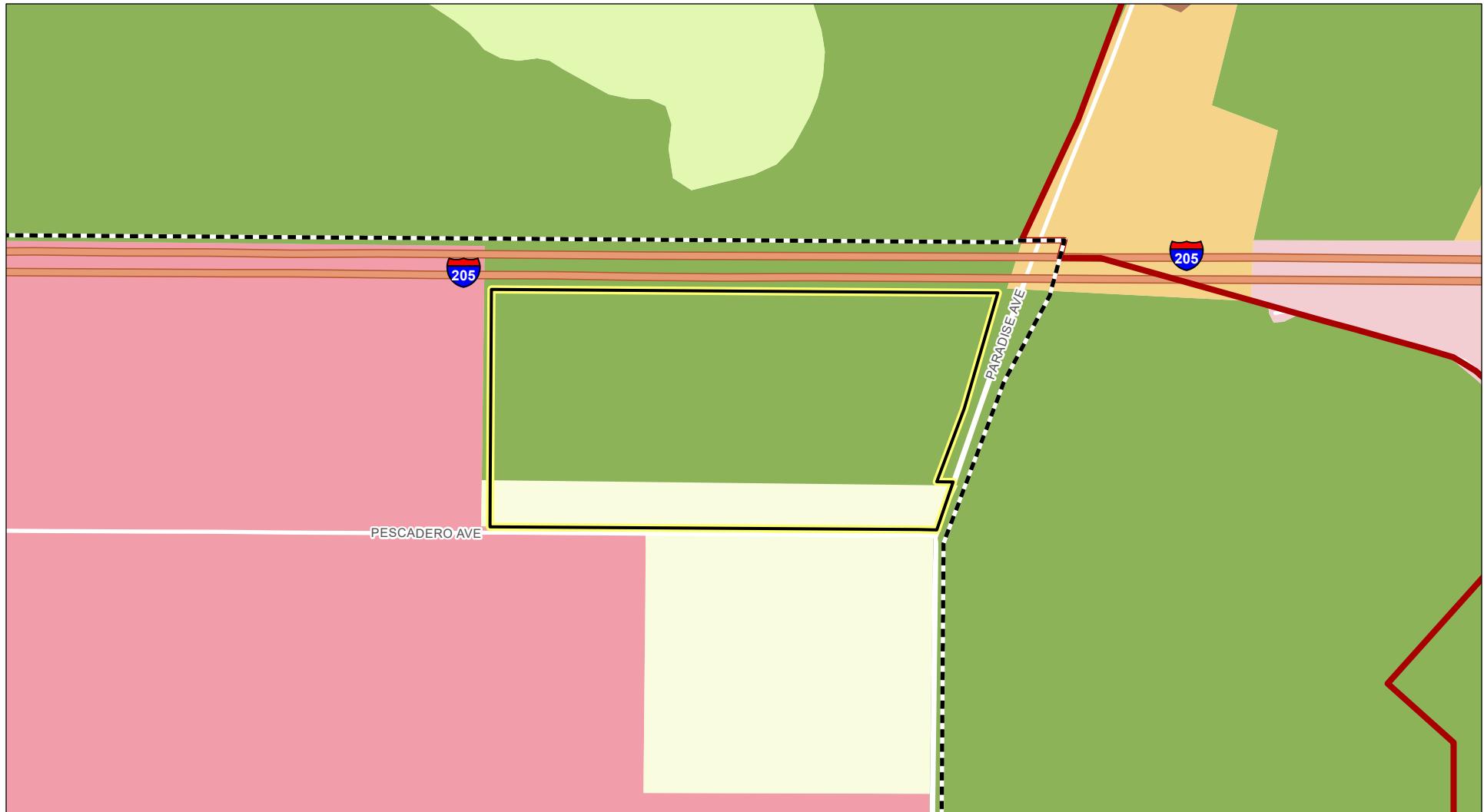
The potential environmental impacts from development of the site for urban uses and the associated removal of prime farmland soil for agricultural use were considered and addressed in the City of Tracy General Plan and Final EIR. There, it was determined that buildout of the General Plan would result in the conversion of Prime Farmland, Unique Farmland and Farmland of Statewide Importance to urban uses. The General Plan Draft EIR found this to be a significant and unavoidable impact. On February 1, 2011, the Tracy City Council adopted a Statement of Overriding Considerations (Resolution 2011-028) for the loss of prime agricultural land resulting from adoption of the Plan and EIR, and provided mitigation measures for the agricultural land lost to development in the City of Tracy's urbanized areas. Mitigation measures included the implementation of a "Right to Farm" ordinance by the City (Tracy Municipal Code Chapter 10.24 et seq.), intended to preserve and protect existing agricultural operations within the incorporated City, and participation in the City's agricultural mitigation fee program (Tracy Municipal Code, Chapter 13.26).

The Tracy General Plan land use designation for the Project site is Industrial (consistent with the proposed project) and the site is within the Northeast Industrial Specific Plan Area. These land uses are intended for future urban land uses in the Tracy General Plan. As such, implementation of the proposed Project would not create new impacts over and above those identified in the General Plan Final EIR, nor significantly change previously identified impacts. Therefore, this impact would **less than significant**.

Response b): No Impact. The Project site is not under a Williamson Act Contract, nor are any of the parcels immediately adjacent to the Project site under a Williamson Act Contract, or designated for agricultural uses. Therefore, implementation of the proposed project would not conflict with a Williamson Act Contract, and would not conflict with any agricultural zoning. As such, there is **no impact**.

Responses c) and d): No Impact. The Project site is located in an area consisting of industrial development. There are no forest resources on the Project site or in the immediate vicinity of the Project site. Therefore, there is **no impact**.

Response e): Less than Significant. The proposed Project site has previously been used for agricultural purposes, but is not designated or zoned for agricultural uses. The proposed Project is identified for urban land uses in the Tracy General Plan. The proposed Project is consistent with the overriding considerations that were adopted for the General Plan. As such, implementation of the proposed Project would not create new impacts over and above those identified in the General Plan Final EIR, nor significantly change previously identified impacts. Therefore, implementation of the proposed Project would result in a **less-than-significant** impact.



LEGEND

Project Site

Farmland of Local Importance

Tracy City Limits

Confined Animal Agriculture

Tracy SOI

Rural Residential Land

Farmland Type

Prime Farmland

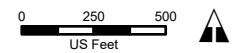
Unique Farmland

Semi-agricultural and Rural Commercial Land

Urban and Built-Up Land

PARADISE POINTE BUSINESS PARK

Figure 5. Important Farmland



Sources: Farmland Mapping and Monitoring Program; San Joaquin County GIS. Map date: April 10, 2025.

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III. AIR QUALITY -- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Conflict with or obstruct implementation of the applicable air quality plan?	X			
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?	X			
c) Expose sensitive receptors to substantial pollutant concentrations?	X			
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	X			

EXISTING SETTING

The Project site is located within the boundaries of the San Joaquin Valley Air Pollution Control District (SJVAPCD). This agency is responsible for monitoring air pollution levels and ensuring compliance with federal and state air quality regulations within the San Joaquin Valley Air Basin (SJVAB) and has jurisdiction over most air quality matters within its borders.

The SJVAPCD has primary responsibility for compliance with both the federal and state standards and for ensuring that air quality conditions are maintained. They do this through a comprehensive program of planning, regulation, enforcement, technical innovation, and promotion of the understanding of air quality issues.

Activities of the SJVAPCD include the preparation of plans for the attainment of ambient air quality standards, adoption and enforcement of rules and regulations concerning sources of air pollution, issuance of permits for stationary sources of air pollution (i.e., Authority to Construct and Permit to Operate), inspection of stationary sources of air pollution and response to citizen complaints, monitoring of ambient air quality and meteorological conditions, and implementation of programs and regulations required by the Federal Clean Air Act and California Clean Air Act.

The SJVAPCD has prepared the 2007 Ozone Plan to achieve Federal and State standards for improved air quality in the SJVAB regarding ozone. The 2007 Ozone Plan provides a comprehensive list of regulatory and incentive-based measures to reduce emissions of ozone and particulate matter precursors throughout the SJVAB. The 2007 Ozone Plan calls for major advancements in pollution control technologies for mobile and stationary sources of air pollution. The 2007 Ozone Plan calls for a 75-percent reduction in ozone-forming oxides of nitrogen emissions.

The SJVAPCD has also prepared the 2007 PM10 Maintenance Plan and Request for Redesignation (2007 PM10 Plan). On April 24, 2006, the SJVAPCD submitted a Request for Determination of

PM10 Attainment for the Basin to the California Air Resources Board (CARB). CARB concurred with the request and submitted the request to the U.S. EPA on May 8, 2006. On October 30, 2006, the EPA issued a Final Rule determining that the Basin had attained the National Ambient Air Quality Standards (NAAQS) for PM10. However, the EPA noted that the Final Rule did not constitute a redesignation to attainment until all of the Federal Clean Air Act requirements under Section 107(d)(3) were met.

The SJVAPCD has prepared the 2008 PM2.5 Plan to achieve Federal and State standards for improved air quality in the San Joaquin Valley Air Basin. The 2008 PM2.5 Plan provides a comprehensive list of regulatory and incentive-based measures to reduce PM2.5.

In addition to the 2007 Ozone Plan, the 2008 PM2.5 Plan, and the 2007 PM10 Plan, the SJVAPCD prepared the Guide for Assessing and Mitigating Air Quality Impacts (GAMAQI). The GAMAQI is an advisory document that provides Lead Agencies, consultants, and project applicants with analysis guidance and uniform procedures for addressing air quality impacts in environmental documents. Local jurisdictions are not required to utilize the methodology outlined therein. This document describes the criteria that SJVAPCD uses when reviewing and commenting on the adequacy of environmental documents. It recommends thresholds for determining whether or not projects would have significant adverse environmental impacts, identifies methodologies for predicting project emissions and impacts, and identifies measures that can be used to avoid or reduce air quality impacts. An update of the GAMAQI was approved on March 19, 2015, and is used as a guidance document for this analysis.

The GAMAQI notes that, for CEQA purposes, a sensitive receptor is generically defined as a location where human populations, especially children, seniors, and sick persons are found, and there is reasonable expectation of continuous human exposure according to the averaging period for the Ambient Air Quality Standards (e.g., 24-hour, 8- hour, 1-hour). These typically include residences, hospitals, and schools. Locations of sensitive receptors may or may not correspond with the location of the maximum off-site concentration. The sensitive receptors in the vicinity of the project site include single-family residences located south and southeast of the site. Specifically, the nearest single-family residence is located along Hansen Road approximately 2,500 feet south of the southern site boundary, and another single-family residence is located approximately 3,500 feet southeast of the southeastern corner of the project site.

RESPONSES TO CHECKLIST QUESTIONS

Responses a-d): Potentially Significant. Based on the current air quality conditions in the SJVAB, as well as the size of the proposed warehouse buildings, it has been determined that the potential impacts on air quality caused by the proposed project will require a detailed analysis in the EIR. As such, the lead agency will examine each of the environmental issues listed in the checklist above in the EIR and will decide whether the proposed project has the potential to have a significant impact on air quality. At this point, a definitive impact conclusion for each of these environmental topics will not be made. Rather, all are considered **potentially significant** until a detailed analysis is prepared in the EIR.

The EIR will include an air quality analysis that presents the methodology, thresholds of significance, a project-level impact analysis, a cumulative impact analysis, and a discussion of feasible mitigation measures that should be implemented to reduce any potential impacts on air quality. The project may result in toxic air contaminants, short-term construction-related emissions, and long-term operational emissions, primarily attributable to emissions from vehicle trips and from energy consumption by the industrial uses. The air quality analysis will include the following:

- A description of regional and local air quality as well as meteorological conditions that could affect air pollutant dispersal or transport in the vicinity of the project site. Applicable air quality regulatory framework, standards, and significance thresholds will be discussed.
- An analysis of the proposed project's potential to conflict with or obstruct implementation of SJVAPCD's 2015 GAMAQI, and any other applicable air quality plans.
- An analysis of the SJVAPCD Rules and Regulations that are applicable to the proposed project.
- Short-term (i.e., construction) increases in regional criteria air pollutants will be quantitatively assessed. The latest version of the CARB-approved California Emissions Estimator Model (CalEEMod) computer model will be used to estimate regional mobile source and particulate matter emissions associated with the construction of the proposed project.
- Long-term (i.e., operational) increases in regional criteria air pollutants will be quantitatively assessed for area source, mobile sources, and stationary sources. The CARB-approved CalEEMod computer model will be used to estimate emissions associated with the proposed project. Modeling will be provided for the worst-case proposed project land use scenario.
- Exposure to odorous or toxic air contaminants during the project's operational phase will be assessed through an air toxics health risk assessment, utilizing AERMOD and HARP-2 risk modeling software, following guidance as provided by the SJVAPCD and the CARB. Incremental cancer risk for residents and workers, and chronic and acute hazards will be assessed.
- Local mobile-source (carbon monoxide) (CO) concentrations will be assessed through a CO screening method as recommended by the SJVAPCD. If the screening method indicates that modeling is necessary, upon review of the traffic analysis, CO concentrations will be modeled using the California Department of Transportation (Caltrans)-approved CALINE4 computer model.
- The potential for the proposed project to generate objectionable odors on neighboring sensitive receptors will be assessed qualitatively following CARB recommendations.

IV. BIOLOGICAL RESOURCES -- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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?		X		
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 US Fish and Wildlife Service?				X
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?				X
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?			X	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?		X		
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?		X		

METHODS

The biological site conditions and the potential for the presence of special-status species were investigated and assessed by De Novo Planning Group's staff biologist. See below for the pre-field investigation and field survey methodology.

Pre-Field Investigation

Prior to the field investigation, numerous maps, databases, and reports were reviewed including:

- U.S. Geological Survey (USGS) 7.5-minute Quadrangle
- USGS National Hydrography Data Set
- Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps
- National Resource Conservation Service (NRCS) Soil Survey
- California Wildlife Habitat Relationships (CWHR) maps
- California Natural Diversity Database (CNDDB)

- California Native Plant Society's (CNPS) Inventory of Rare and Endangered Plants
- U.S. Fish and Wildlife Service's (USFWS) IPac
- U.S. Fish and Wildlife Service's (USFWS) Official List

Field Survey

The Development Area was subject to a field survey by Principal Biologist Steve McMurtry on March 20, 2025. The survey served several purposes. First, it served as reconnaissance of the site to establish the existing conditions of the site and to verify information gathered in the pre-field investigation. This included identification of the habitat types, hydrologic features, topography, soil characteristics, vegetation. The field investigations followed the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW 2009). A field investigation was performed on foot using transects. Habitat was recorded, and the property was inspected for the presence, or potential for presence of wildlife. The area was inspected for its upland and aquatic habitat functions. The property was also examined for evidence of scat and tracks of mammals. Visibility during the survey was good.

The majority of the Development Area contains land previously used for agricultural uses. The majority of the Remediation Area contains undisturbed, naturalized annual grassland. The Remediation Area also contains debris piles, concrete, pipes, trash, and dirt mounds. There are a few ditches on-site, including an irrigation ditch, a dirt supply channel, and a concrete supply channel.

RESPONSES TO CHECKLIST QUESTIONS

Response a): Less than Significant with Mitigation. Special-status invertebrates that occur within the San Joaquin County region include: longhorn fairy shrimp, vernal pool fairy shrimp, and midvalley fairy shrimp, which requires vernal pools and swale areas within grasslands; and the valley elderberry longhorn beetle, which is an insect that is only associated with blue elderberry plants, oftentimes in riparian areas and sometimes on land in the vicinity of riparian areas. The biological site conditions and the potential for the presence of special-status species were assessed by De Novo Planning Group's staff biologist on March 20, 2025.

The Project site does not contain essential habitat for these special status invertebrates. Implementation of the proposed project would have a **less than significant** impact on these species.

Special-status reptiles and amphibians that occur within the region include: the western pond turtle, which requires aquatic environments located along ponds, marshes, rivers, and ditches; the California tiger salamander, which is found in grassland habitats where there are nearby seasonal wetlands for breeding; the silvery legless lizard, which is found in sandy or loose loamy soils under sparse vegetation with high moisture content; San Joaquin whipsnake, which requires open, dry habitats with little or no tree cover with mammal burrows for refuge; the Alameda whipsnake, which is restricted to valley-foothill hardwood habitat on south-facing slopes; the California horned lizard, which occurs in a variety of habitats including, woodland, forest, riparian, and annual grasslands, usually in open sandy areas; the foothill yellow-legged frog, which occurs in partly shaded and shallow streams with rocky soils; the California red legged

frog, which occurs in stream pools and ponds with riparian or emergent marsh vegetation; and the western spadefoot toad, which requires grassland habitats associated with vernal pools. The biological site conditions and the potential for the presence of special-status species were assessed by De Novo Planning Group's staff biologist on March 20, 2025. The Project site does not contain essential habitat for these special status reptiles and amphibians. Implementation of the proposed project would have a **less than significant** impact on these species.

Numerous special-status plant species are known to occur in the region. Many of these special status plant species require specialized habitats such as serpentine soils, rocky outcrops, slopes, vernal pools, marshes, swamps, riparian habitat, alkali soils, and chaparral, which are not present on the Project site. The Project site is located in an area that was likely valley grassland prior to human settlement, and there are several plant species that are found in valley and foothills grasslands areas. These species include large-flowered fiddleneck, bent-flowered fiddleneck, big-balsamroot, big tarplant, round-leaved filaree, Lemmon's jewelflower, and showy golden madia. Human settlement has involved a high frequency of ground disturbance associated with the historical farming activities in the region, including the Project site. The biological site conditions and the potential for the presence of special-status species were assessed by De Novo Planning Group's staff biologist on March 20, 2025. The Project site does not contain suitable habitat for special-status plant species. Implementation of the proposed project would have a **less than significant** impact on these species.

Special-status birds that occur within the region include: tricolored blackbird, Swainson's hawk, northern harrier, and bald eagle, which are associated with streams, rivers, lakes, wetlands, marshes, and other wet environments; loggerhead shrike, and burrowing owl, which lives in open areas, usually grasslands, with scattered trees and brush; and raptors that are present in varying habitats throughout the region. The biological site conditions and the potential for the presence of special-status species and raptors were assessed by De Novo Planning Group's staff biologist on March 20, 2025.

Swainson's Hawk. The Swainson's hawk is threatened in California and is protected by the California Department of Fish and Wildlife (CDFW) and the Migratory Bird Treaty Act (MBTA). Additionally, Swainson's hawk foraging habitat is protected by the CDFG. Swainson's hawks forage in open grasslands and agricultural fields and commonly nest in solitary trees and riparian areas in close proximity to foraging habitat. The foraging range for Swainson's hawk is ten miles from its nesting location. There are numerous documented occurrences of Swainson's hawk within ten miles of the Project site. None of the occurrences are within the Project site boundary. The land uses adjacent to the Project site are not suitable for Swainson's hawk habitat, as they are all industrial uses or agricultural row crops. The Project site and nearby land uses may provide lower quality foraging opportunities for Swainson's hawk due to their limited capacity for long-term foraging. Incidental take minimization measures are required for this species due to the fact that there are suitable foraging habitat on the Project site.

The implementation of Mitigation Measure BIO-1 would ensure that Swainson's hawks are not impacted during construction activities. The implementation of Mitigation Measure BIO-1 would ensure a **less than significant** impact to Swainson's hawks.

Burrowing Owls. Burrowing owls are a California Species of Special Concern and are protected by the CDFG and the MBTA. Burrowing owls forage in open grasslands and shrublands and typically nest in old ground squirrel burrows. The Project site contains a very small volume of suitable, but not high-quality habitat for burrowing owls. Specifically, the Remediation Area contains potentially suitable habitat for burrowing owls. Nevertheless, impacts to burrowing owls are considered unlikely, due to the presence of urban development to the south and west, and SR-205 to the north. The uses to the east of the Project site contain agricultural land which offers suitable, but not high quality, foraging and roosting habitat for wintering or breeding owls. The implementation of Mitigation Measure BIO-1 would ensure that burrowing owls are not impacted during construction activities. The implementation of Mitigation Measure BIO-1 would ensure a **less than significant** impact to burrowing owls.

Mitigation Measure(s)

Mitigation Measure BIO-1: *Prior to the commencement of grading activities or other ground disturbing activities on the Project site, the project applicant shall arrange for a qualified biologist to conduct a preconstruction survey for western burrowing owls. If no owls or owl nests are detected, then construction activities may commence. If burrowing owls or occupied nests are discovered, then the following shall be implemented:*

- *During the breeding season (February 1 through September 1) occupied burrows shall not be disturbed and shall be provided with a 75 meter protective buffer until and unless the SJCOG Technical Advisory Committee (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 are foraging independently and are capable of independent survival. Once the fledglings are capable of independent survival, the burrow can be destroyed. They should only be destroyed by a qualified biologist using passive one-way eviction doors to ensure that owls are not harmed during burrow destruction. Methods for removal of burrows are described in the California Department of Fish and Game's Staff Report on Burrowing Owls (Oct., 1995)*
- *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's Staff Report on Burrowing Owls (Oct., 1995)*

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

Response b): No Impact. Riparian natural communities support woody vegetation found along rivers, creeks and streams. Riparian habitat can range from a dense thicket of shrubs to a closed canopy of large mature trees covered by vines. Riparian systems are considered one of the most important natural resources. While small in total area when compared to the state's size, they provide a special value for wildlife habitat.

Over 135 California bird species either completely depend upon riparian habitats or use them preferentially at some stage of their life history. Riparian habitat provides food, nesting habitat, cover, and migration corridors. Another 90 species of mammals, reptiles, invertebrates and amphibians depend on riparian habitat. Riparian habitat also provides riverbank protection, erosion control and improved water quality, as well as numerous recreational and aesthetic values.

There is no riparian habitat or other sensitive natural communities located on the Project site. As such, the proposed project would have **no impact** on these resources, and no mitigation is required.

Response c): Less than Significant. A wetland is an area that is inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas.

Wetlands are defined by regulatory agencies as having special vegetation, soil, and hydrology characteristics. Hydrology, or water inundation, is a catalyst for the formation of wetlands. Frequent inundation and low oxygen causes chemical changes to the soil properties resulting in what is known as hydric soils. The prevalent vegetation in wetland communities consists of hydrophytic plants, which are adapted to areas that are frequently inundated with water. Hydrophytic plant species have the ability to grow, effectively compete, reproduce, and persist in low oxygen soil conditions.

Below is a list of wetlands that are found in the Tracy planning area:

- Farmed Wetlands: This category of wetlands includes areas that are currently in agricultural uses. This type of area occurs in the northern portion of the Tracy Planning Area.
- Lakes, Ponds and Open Water: This category of wetlands includes both natural and human-made water bodies such as that associated with working landscapes, municipal water facilities and canals, creeks and rivers.
- Seasonal Wetlands: This category of wetlands includes areas that typically fill with water during the wet winter months and then drain enough to become ideal plant habitats throughout the spring and summer. There are numerous seasonal wetlands throughout the Tracy Planning Area.
- Tidal Salt Ponds and Brackish Marsh: This category of wetlands includes areas affected by irregular tidal flooding with generally poor drainage and standing water. There are minimal occurrences along some of the larger river channels in the northern portion of the Tracy Planning Area.

There are no wetlands located on the Project site. Therefore, this is a **less than significant** impact and no mitigation is required.

Response d): Less than Significant. The CNDD record search did not reveal any documented wildlife corridors or wildlife nursery sites on or adjacent to the Project site. Implementation of the proposed project would have a **less than significant** impact.

Responses e), f): Less than Significant. The Project site is located within the jurisdiction of the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan ("Plan" or "SJM SCP") and is located within the Central/Southwest Transition Zone of the SJM SCP. The San Joaquin Council of Governments (SJC OG) prepared the Plan pursuant to a Memorandum of Understanding adopted by SJC OG, San Joaquin County, the United States Fish and Wildlife Service (USFWS), the CDFW, Caltrans, and the cities of Escalon, Lathrop, Lodi, Manteca, Ripon, Stockton, and Tracy in October 1994. On February 27, 2001, the Plan was unanimously adopted in its entirety by SJC OG. The City of Tracy adopted the Plan on November 6, 2001.

According to Chapter 1 of the SJM SCP, its key purpose is to "provide a strategy for balancing the need to conserve open space and the need to convert open space to non-open space uses, while protecting the region's agricultural economy; preserving landowner property rights; providing for the long-term management of plant, fish and wildlife species, especially those that are currently listed, or may be listed in the future, under the Federal Endangered Species Act (ESA) or the California Endangered Species Act (CESA); providing and maintaining multiple use Open Spaces which contribute to the quality of life of the residents of San Joaquin County; and, accommodating a growing population while minimizing costs to project proponents and society at large."

In addition to providing compensation for conversion of open space to non-open space uses, which affect plant and animal species covered by the SJM SCP, the SJM SCP also provides some compensation to offset impacts of open space conversions on non-wildlife related resources such as recreation, agriculture, scenic values and other beneficial open space uses. Specifically, the SJM SCP compensates for conversions of open space to urban development and the expansion of existing urban boundaries, among other activities, for public and private activities throughout the County and within Escalon, Lathrop, Lodi, Manteca, Ripon, Stockton, and Tracy.

Participation in the SJM SCP is voluntary for both local jurisdictions and project applicants. Only agencies adopting the SJM SCP would be covered by the SJM SCP. Individual project applicants have two options if their project is located in a jurisdiction participating in the SJM SCP: mitigating under the SJM SCP or negotiating directly with the state and/or federal permitting agencies. If a project applicant opts for SJM SCP coverage in a jurisdiction that is participating under the SJM SCP, the following options are available, unless their activities are otherwise exempted: pay the appropriate fee; dedicate, as conservation easements or fee title, habitat lands; purchase approved mitigation bank credits; or, propose an alternative mitigation plan.

Responsibilities of permittees covered by the SJM SCP include collection of fees, maintenance of implementing ordinances/resolutions, conditioning permits (if applicable), and coordinating with the Joint Powers Authority (JPA) for Annual Report accounting. Funds collected for the SJM SCP are to be used for the following: acquiring Preserve lands, enhancing Preserve lands, monitoring and management of Preserve lands in perpetuity, and the administration of the

SJMSCP. Because the primary goal of SJMSCP is to preserve productive agricultural use that is compatible with SJMSCP's biological goals, most of the SJMSCP's Preserve lands would be acquired through the purchase of easements in which landowners retain ownership of the land and continue to farm the land. These functions are managed by SJCOG.

The proposed project is classified as Urban Habitat under the SJMSCP. The proposed project was analyzed for consistency with the SJMSCP by De Novo Planning Group, and it was determined that the proposed project would not conflict with the SJMSCP. The City of Tracy and the project applicant shall consult with SJCOG to utilize coverage of the project pursuant to the SJMSCP prior to development of the site. Therefore, this is a **less than significant** impact.

Mitigation Measure(s)

Mitigation Measure BIO-2: *Prior to development of the site, including the commencement of grading activities, the City of Tracy and the project applicant shall consult with SJCOG to utilize coverage of the project pursuant to the SJMSCP.*

V. CULTURAL RESOURCES -- WOULD THE PROJECT:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to '15064.5?		X		
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to '15064.5?		X		
c) Disturb any human remains, including those interred outside of formal cemeteries?		X		

RESPONSES TO CHECKLIST QUESTIONS

Response a), b), c): Less than Significant with Mitigation. The City of Tracy General Plan and subsequent EIR do not identify the Project site as having prehistoric period, or cultural resources. Additionally, there are no known unique cultural, historical, paleontological or archeological resources known to occur on, or within the immediate vicinity of the Project site.

Because the site has been previously disturbed by the agricultural operations, it is not anticipated that site grading and preparation activities would result in impacts to cultural, historical, archaeological or paleontological resources. There are no known human remains located on the Project site, nor is there evidence to suggest that human remains may be present on the Project site. 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 or human remains.

The implementation of Mitigation Measure CUL-1 would require appropriate steps to preserve and/or document any previously undiscovered resources that may be encountered during construction activities, including human remains. Implementation of this requirement would reduce this impact to a **less than significant** level.

Mitigation Measure(s)

Mitigation Measure CUL-1: *If any prehistoric or historic artifacts, human remains 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.*

VI. ENERGY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	X			
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	X			

RESPONSES TO CHECKLIST QUESTIONS

Responses a), b): Potentially Significant. Appendix G of the State CEQA Guidelines requires consideration of the potentially significant energy implications of a project. CEQA requires mitigation measures to reduce “wasteful, inefficient and unnecessary” energy usage (Public Resources Code Section 21100, subdivision [b][3]). According to Appendix G of the CEQA Guidelines, the means to achieve the goal of conserving energy include decreasing overall energy consumption, decreasing reliance on natural gas and oil, and increasing reliance on renewable energy sources. In particular, the proposed project would be considered “wasteful, inefficient, and unnecessary” if it were to violate state and federal energy standards and/or result in significant adverse impacts related to project energy requirements, energy inefficiencies, energy intensiveness of materials, cause significant impacts on local and regional energy supplies or generate requirements for additional capacity, fail to comply with existing energy standards, otherwise result in significant adverse impacts on energy resources, or conflict or create an inconsistency with applicable plan, policy, or regulation.

The amount of energy used at the Project site would directly correlate to the energy consumption (including fuel) used by vehicle trips generated during project construction, fuel used by off-road construction vehicles during construction, fuel used by vehicles during project operation, and electricity and other energy usage during project operation.

Due to the size of the proposed warehouse buildings, the potential impacts on energy caused by the proposed Project will require a detailed analysis in the EIR. Consequently, the lead agency will examine each of the environmental issues listed in the checklist above in the EIR and will decide whether the proposed project has the potential to have a significant impact on energy resources. The EIR will include a discussion and analysis that provides calculated levels of energy use expected for the proposed project, based on commonly used modelling software (i.e. CalEEMod and the CARB’s EMFAC2021). At this point, a definitive impact conclusion for each of these environmental topics will not be made. Rather, all are considered **potentially significant** until a detailed analysis is prepared in the EIR.

VII. GEOLOGY AND SOILS -- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Expose people or structures to 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.			X	
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?		X		
iv) Landslides?			X	
b) Result in substantial soil erosion or the loss of topsoil?			X	
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?			X	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?			X	
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?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X	

RESPONSES TO CHECKLIST QUESTIONS

Responses a.i), a.ii): Less than Significant. The Project site is located in an area of moderate to high seismicity. However, no known active faults cross the Project site, and the site is not located within an Alquist-Priolo Earthquake Fault Zone. Nevertheless, relatively large earthquakes have historically occurred in the Bay Area and along the margins of the Central Valley. Many earthquakes of low magnitude occur every year in California. The nearest earthquake fault zoned as active by the State of California Geological Survey is the Vernalis Fault, located approximately 4 miles to the west of the site. Figure 6 shows nearby faults in relation to the Project site.

Portions of the Great Valley fault are considered seismically active thrust faults; however, since the Great Valley fault segments are not known to extend to the ground surface, the State of California has not defined Earthquake Fault Hazard Zones around the postulated traces. The Great Valley fault is considered capable of causing significant ground shaking at the site, but the recurrence interval is believed longer than for more distant, strike-slip faults. Further seismic activity can be expected to continue along the western margin of the Central Valley, and as with all projects in the area, the project will be designed to accommodate strong earthquake ground shaking, in compliance with the applicable California building code standards.

Other active faults capable of producing significant ground shaking at the site include the Midway fault and the Corral Hollow-Carnegie fault zone to the east, and the Black Butte fault and Great Valley thrust fault system to the south. Any one of these faults could generate an earthquake capable of causing strong ground shaking at the Development Area and Remediation Area. Earthquakes of Moment Magnitude (Mw) 7 and larger have historically occurred in the region and numerous small magnitude earthquakes occur every year.

Since there are no known active faults crossing the Project site and the site is not located within an Earthquake Fault Special Study Zone, the potential for ground rupture at the site is considered low.

An earthquake of moderate to high magnitude generated within the San Francisco Bay Region and along the margins of the central valley could cause considerable ground shaking at the site, similar to that which has occurred in the past. In order to minimize potential damage to the proposed structures caused by groundshaking, all construction would comply with the latest California Building Code standards, as required by the City of Tracy Municipal Code 9.04.030.

Seismic design provisions of current building codes generally prescribe minimum lateral forces, applied statically to the structure, combined with the gravity forces of dead-and-live loads. The code-prescribed lateral forces are generally considered to be substantially smaller than the comparable forces that would be associated with a major earthquake. Therefore, structures should be able to: (1) resist minor earthquakes without damage, (2) resist moderate earthquakes without structural damage but with some nonstructural damage, and (3) resist major earthquakes without collapse but with some structural as well as nonstructural damage.

Building new structures for human use would increase the number of people exposed to local and regional seismic hazards. Seismic hazards are a significant risk for most property in California.

The Safety Element of the Tracy General Plan includes several goals, objectives and policies to reduce the risks to the community from earthquakes and other geologic hazards. In particular, the following policies would apply to the Project site:

SA-1.1, Policy P1: Underground utilities, particularly water and natural gas mains, shall be designed to withstand seismic forces.

SA-1.1, Policy P2: Geotechnical reports shall be required for development in areas where potentially serious geologic risks exist. These reports should address the degree of hazard, design parameters for the project based on the hazard, and appropriate mitigation measures.

SA-1.2, Policy P1: All construction in Tracy shall conform to the California Building Code and the Tracy Municipal Code including provisions addressing unreinforced masonry buildings.

The City reviews all proposed development projects for consistency with the General Plan policies and California Building Code provisions identified above. This review occurs throughout the project application review and processing stage, and throughout plan check and building inspection phases prior to the issuance of a certificate of occupancy.

Consistency with the requirements of the California Building Code and the Tracy General Plan policies identified above would ensure that impacts on humans associated with seismic hazards would be **less than significant**.

Responses a.iii): Less than Significant with Mitigation. Liquefaction normally occurs when sites underlain by saturated, loose to medium dense, granular soils are subjected to relatively high ground shaking. During an earthquake, ground shaking may cause certain types of soil deposits to lose shear strength, resulting in ground settlement, oscillation, loss of bearing capacity, landsliding, and the buoyant rise of buried structures. The majority of liquefaction hazards are associated with sandy soils, some silty soils of low plasticity, and some gravelly soils. Cohesive soils are generally not considered to be susceptible to liquefaction. In general, liquefaction hazards are most severe within the upper 50 feet of the surface, except where slope faces or deep foundations are present. Soils that underlay the Project site consist of predominantly clay soil particle sizes. Clay-type soils are generally not subject to liquefaction.

As identified in the Tracy General Plan EIR, the majority of the Tracy Planning Area is at low risk for liquefaction, with the exception for the river banks within the Planning Area. Objective SA-1.1 states that geologic hazards should be minimized. The Safety Element contains a policy requiring that geotechnical engineering studies be undertaken for any development in areas where potentially serious geologic risks exist (Objective SA- 1.1, P1), which would include liquefaction. The General Plan EIR concluded that the implementation of this policy would reduce the potential risk of liquefaction to a **less-than-significant** level.

Prior to development of the Project site, a subsurface geotechnical investigation must be performed to identify onsite soil conditions and identify any site-specific engineering measures to be implemented during the construction of building foundations and subsurface utilities. Adherence to the engineering requirements contained in the subsurface geotechnical report would ensure that this impact is **less than significant**.

Mitigation Measure (s)

Mitigation Measure GEO-1: *Prior to development of the Project site, a subsurface geotechnical investigation must be performed to identify onsite soil conditions and identify any site-specific engineering measures to be implemented during the construction of building foundations and subsurface utilities.*

Responses a.iv): Less than Significant. The Project site is relatively flat and there are no major slopes in the vicinity of the Project site. As such, the Project site is exposed to little or no risk associated with landslides. This is a **less than significant** impact.

Response b): Less than Significant. During the construction preparation process, exposed surfaces could be susceptible to erosion from wind and water. Effects from erosion include impacts on water quality and air quality. Exposed soils that are not properly contained or capped increase the potential for increased airborne dust and increased discharge of sediment and other pollutants into nearby stormwater drainage facilities. Risks associated with erosive surface soils can be reduced by using appropriate controls during construction and properly re-vegetating exposed areas. Mitigation Measures AQ-1 through 3 (Air Quality), require the implementation of various dust control measures during site preparation and construction activities that would reduce the potential for soil erosion and the loss of topsoil. Additionally, Mitigation Measure HYD-1 (Hydrology and Water Quality) would require the implementation of various best management practices (BMPs) and a SWPPP that would reduce the potential for disturbed soils and ground surfaces to result in erosion and sediment discharge into adjacent surface waters during construction activities. The implementation of these requirements would ensure impacts are **less than significant**.

Responses c), d): Less than Significant. The potential for the project to be exposed to unstable soil conditions resulting from on-or off-site landslide, and liquefaction are discussed above under Responses a.iii, and a.iv., and were found to be **less than significant** impacts.

Lateral Spreading: The geologic conditions conducive to lateral spreading include gentle surface slope (0.3-5% slope), and liquefiable soils. As identified in the Tracy General Plan EIR, the majority of the Tracy Planning Area is at low risk for liquefaction, with the exception for the river banks within the Planning Area. Soils that underlay the Project site consist of predominantly clay soil particle sizes, which are generally not subject to liquefaction.

The potential for ground surface damage at the site resulting in lateral spreading is low due to lack of saturated liquefiable soils. Therefore, impacts related to lateral spreading from project implementation would be **less than significant**.

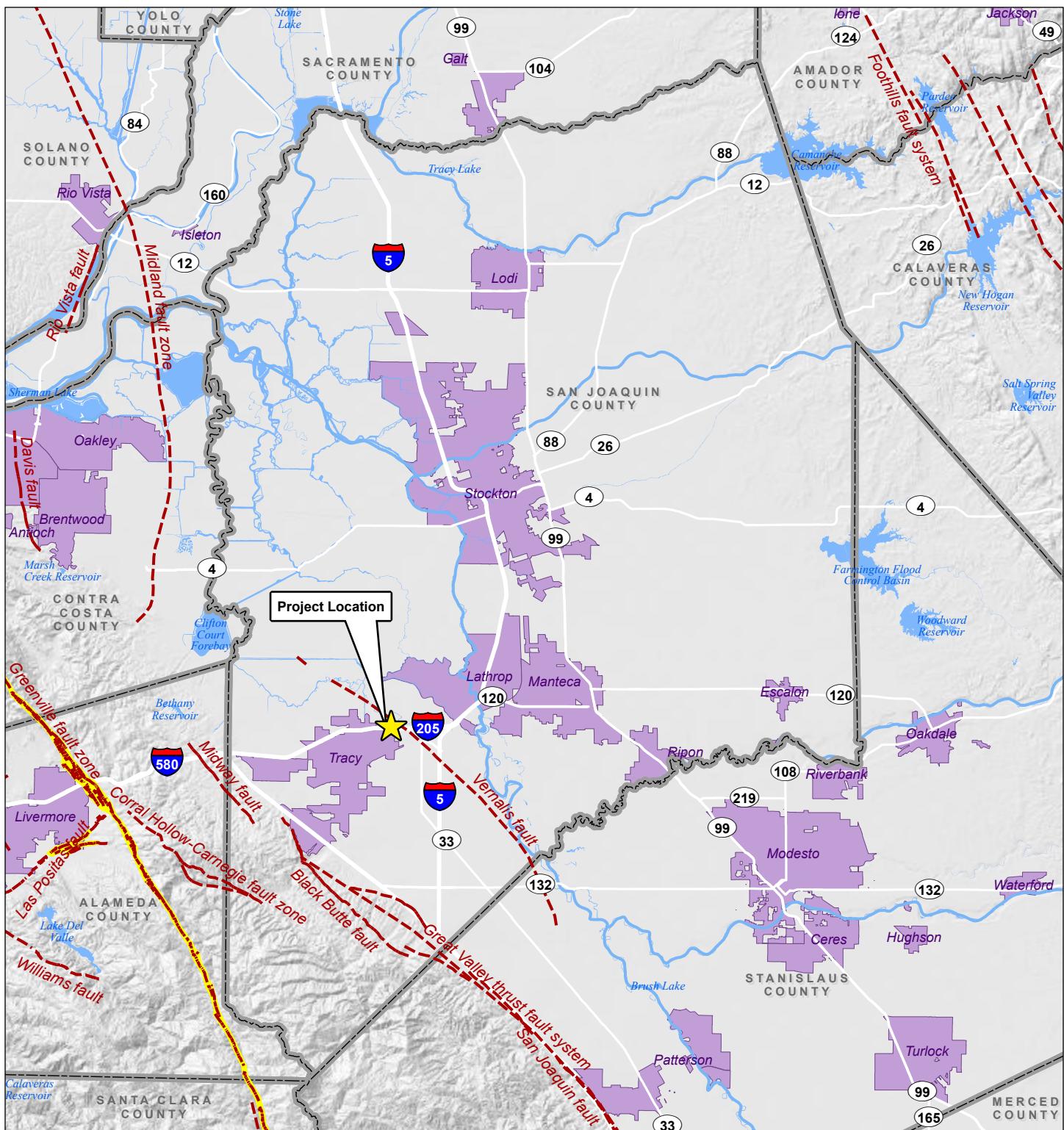
Expansive Soils: Expansive Soils are those that undergo volume changes as moisture content fluctuates; swelling substantially when wet or shrinking when dry. Soil expansion, and settling can damage structures by cracking foundations, causing settlement and distorting structural elements. Expansion is a typical characteristic of clay-type soils. Expansive soils shrink and swell in volume during changes in moisture content, such as a result of seasonal rain events, and can cause damage to foundations, concrete slabs, roadway improvements, and pavement sections.

Soil expansion is dependent on many factors. The more clayey, critically expansive surface soil and fill materials will be subjected to volume changes during seasonal fluctuations in moisture content. As indicated in the Tracy General Plan EIR, Tracy does have a moderate to high risk for expansive soils, depending on the location and soil type. The Safety Element contains objectives to minimize geologic hazards, and a policy to require geotechnical reports for all development proposed in areas with risk of geological hazard (Objective SA-1.1, P2). Therefore, it was concluded that implementation of the General Plan policy would reduce the potential impact related to the risk of soil expansion to a less-than-significant level. Figure 7 shows the shrink-swell potential of soils on the Project site. As shown in Figure 7, soils that underlay the Project site are considered to have a very high potential for expansion. It is noted that the majority of the soils that underlay the project are considered to have a moderate potential for expansion.

To reduce the potential for post-construction distress to the proposed structures resulting from swelling and shrinkage of these materials, a geotechnical evaluation is required by Mitigation Measure GEO-1 in order to reduce the potential for damaging differential settlement of overlying improvements. Additionally, the California Building Code Title 24, Part 2, Chapter 18, Section 1803.1.1.2 requires specific geotechnical evaluation when a preliminary geotechnical evaluation determines that expansive or other special soil conditions are present, which, if not corrected, would lead to structural defects. As such, this is a **less than significant** impact.

Response e): No Impact. The Project site would be served by public wastewater facilities and does not require an alternative wastewater system such as septic tanks. Implementation of the proposed project would have **no impact** on this environmental issue.

Response f): Less than Significant. The Project site is located in an area known to have paleontological resources. The implementation of Mitigation Measure CUL-1 would require appropriate steps to preserve and/or document any previously undiscovered resources that may be encountered during construction activities, including paleontological resources. As such, this is a **less than significant** impact.



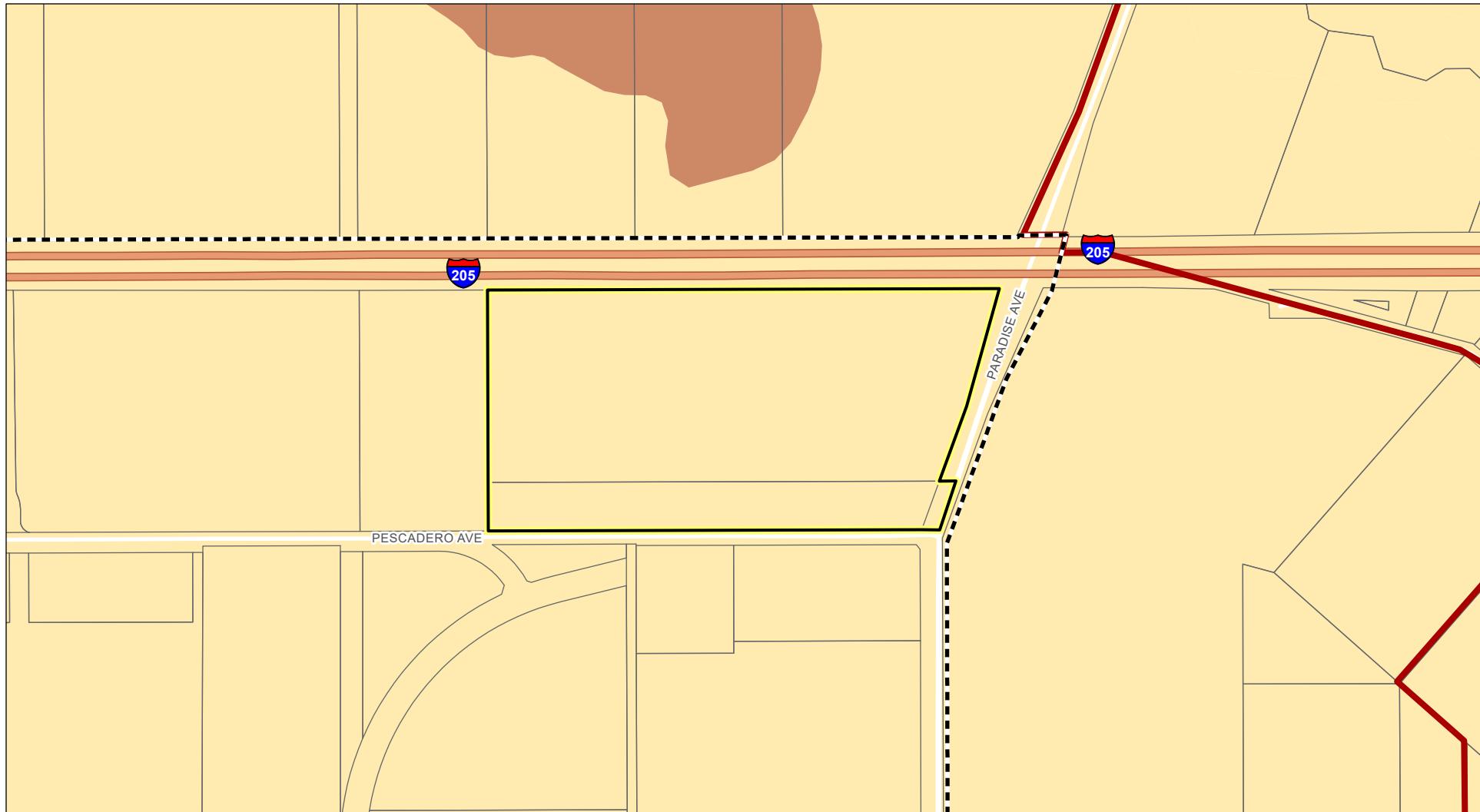
LEGEND

- Quaternary Fault
- Alquist Priolo Fault Zone
- Incorporated Area
- County Boundary

PARADISE POINTE BUSINESS PARK

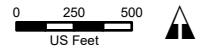
Figure 6. Fault Map

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Sources: USA Soils Map Units; San Joaquin County GIS. Map date: November 1, 2024.

Figure 7. Shrink-Swell Soil



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XIII. GREENHOUSE GAS EMISSIONS – WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	X			
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?	X			

BACKGROUND DISCUSSION

Various gases in the Earth's atmosphere, classified as atmospheric greenhouse gases (GHGs), play a critical role in determining the Earth's surface temperature. Solar radiation enters Earth's atmosphere from space, and a portion of the radiation is absorbed by the Earth's surface. The Earth emits this radiation back toward space, but the properties of the radiation change from high-frequency solar radiation to lower-frequency infrared radiation.

Naturally occurring GHGs include water vapor (H_2O), carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and ozone (O_3). Several classes of halogenated substances that contain fluorine, chlorine, or bromine are also GHGs, but they are, for the most part, solely a product of industrial activities. Although the direct GHGs, including CO_2 , CH_4 , and N_2O , occur naturally in the atmosphere, human activities have changed their atmospheric concentrations. From the pre-industrial era (i.e., ending about 1750) to 2011, concentrations of these three GHGs have increased globally by 40, 150, and 20 percent, respectively (IPCC, 2013).

GHGs, which are transparent to solar radiation, are effective in absorbing infrared radiation. As a result, this radiation that otherwise would have escaped back into space is now retained, resulting in a warming of the atmosphere. This phenomenon is known as the greenhouse effect. Among the prominent GHGs contributing to the greenhouse effect are carbon dioxide (CO_2), methane (CH_4), ozone (O_3), water vapor, nitrous oxide (N_2O), and chlorofluorocarbons (CFCs).

Emissions of GHGs contributing to global climate change are attributable in large part to human activities associated with the industrial/manufacturing, utility, transportation, residential, and agricultural sectors. Consumption of fossil fuels in the transportation sector was the single largest source of California's GHG emissions in 2021, accounting for 39% of total GHG emissions in the state. This category was followed by the industrial sector (22%), the electricity generation sector (including both in-state and out-of-state sources) (16%) and the agriculture and forestry sector (8%) (California Energy Commission, 2024).

As the name implies, global climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants, which are pollutants of regional and local concern, respectively. California produced approximately 381 million gross metric tons of carbon dioxide equivalents (MMTCO₂e) in 2021 (California Energy Commission, 2024). Given that the U.S. EPA estimates that worldwide emissions from human activities totaled nearly 46 billion

gross metric tons of carbon dioxide equivalents (BMTCO₂e) in 2010, California's incremental contribution to global GHGs is approximately 2% (U.S. EPA, 2014).

Carbon dioxide equivalents are a measurement used to account for the fact that different GHGs have different potential to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. This potential, known as the global warming potential of a GHG, is also dependent on the lifetime, or persistence, of the gas molecule in the atmosphere. Expressing GHG emissions in carbon dioxide equivalents takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO₂ were being emitted.

RESPONSES TO CHECKLIST QUESTIONS

Responses a), b): Potentially Significant. Implementation of the proposed Project could generate GHGs from a variety of sources, including but not limited to vehicle trips, electricity consumption, water use, and solid waste generation. There could also be additional GHGs generated from stationary sources, such as industrial processes and/or diesel generators. It has been determined that the potential impacts from GHG emissions by the proposed Project will require a detailed analysis in the EIR. As such, the lead agency will examine each of the environmental issues listed in the checklist above in the EIR and will decide whether the proposed project has the potential to have a significant impact from GHG emissions. At this point, a definitive impact conclusion for each of these environmental topics will not be made. Rather, all are considered **potentially significant** until a detailed analysis is prepared in the EIR.

The EIR will include a GHG emissions analysis pursuant to the requirements of the California Governor's Executive Order S-3-05 and The Global Warming Solutions Act of 2006 (AB 32), Senate Bill 375 (SB 375), and Senate Bill 32 (SB 32). The analysis will follow the California Air Pollution Control Officers Association (CAPCOA) white paper methodology and recommendations presented in "Climate Change and CEQA", which was prepared in coordination with the CARB and the Governor's Office of Planning and Research (OPR) as a common platform for public agencies to ensure that GHG emissions are appropriately considered and addressed under CEQA. Also, a GHG emissions analysis using the SJVAPCD's two-tiered approach in assessing significance of the project specific GHG emissions increases will be performed. These analyses will consider a regional approach toward determining whether GHG emissions are significant, and will present mitigation measures to reduce any potential impacts. The discussion and analysis will include quantification of GHGs generated by the project using the CalEEMod computer model as well as a qualitative discussion of the project's consistency with any applicable state and local plans to reduce the impacts of climate change.

IX. HAZARDS AND HAZARDOUS MATERIALS -- WOULD THE PROJECT:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
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?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
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?			X	
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two 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?			X	
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			X	

RESPONSES TO CHECKLIST QUESTIONS

Responses a), b): Less than Significant. The proposed project would place new industrial uses in an area of the City that currently contains predominantly industrial uses mixed with agricultural uses. The proposed industrial land uses do not routinely transport, use, or dispose of hazardous materials, or present a reasonably foreseeable release of hazardous materials, with the exception of common residential grade hazardous materials such as household cleaners, paint, etc. The operational phase of the proposed project does not pose a significant hazard to the public or the environment.

Any operations that involve the use of hazardous materials would be required to have the hazardous material transported, stored, used, and disposed of in compliance with local, state, and federal regulations. The San Joaquin County Department of Environmental Health is the Certified Unified Program Agencies (CUPA) for San Joaquin County and is responsible for the

implementation of statewide programs within the city including Hazardous Materials Business Plan (HMBP) requirements, among numerous other programs. Additionally, businesses are regulated by Cal/Occupational Safety and Health Administration (OSHA) and are therefore required to ensure employee safety. Specific requirements include identifying hazardous materials in the workplace, providing safety information to workers that handle hazardous materials, and adequately training workers. To further ensure the safety of employees, and reduce the potential for accidental release of hazardous materials into the environment, the applicant must submit a HMBP to San Joaquin County Department of Environmental Health for review and approval prior to bringing hazardous materials onsite

Construction equipment and materials would likely require the use of petroleum-based products (oil, gasoline, diesel fuel), and a variety of common chemicals including paints, cleaners, and solvents. Transportation, storage, use, and disposal of hazardous materials during construction activities would be required to comply with applicable federal, state, and local statutes and regulations. Compliance would ensure that human health and the environment are not exposed to hazardous materials. In addition, Mitigation Measure HYD-1 (Hydrology and Water Quality) requires the project applicant to implement a SWPPP during construction activities, which would prevent any contaminated runoff from leaving the Project site. Therefore, compliance with applicable federal, state, local statutes and regulations, and the SWPPP provided in Mitigation Measure HYD-1, the proposed project would have a **less than significant** impact relative to this issue.

Response c): Less than Significant. The Project site is not located within 1/4-mile of an existing school. The nearest school to the Project site is the Banta Elementary School District, located approximately 0.9 miles southeast of the Project site or further. Therefore, this is a **less than significant** impact

Response d): Less than Significant. According the California Department of Toxic Substances Control (DTSC), there are no Federal Superfund Sites, State Response Sites on, or adjacent to the Development Area. However, the Remediation Area is listed by the DTSC as a Voluntary Agreement cleanup site. The Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5.

The information relating to the Remediation Site's classification by DTSC is provided below:

Haley's Flying Service (site SL0607752832)

- Cleanup Status: Open – Site Assessment as of 1/31/2023
- Site Type: Cleanup Program Site
- National Priorities List: No
- Cleanup Oversight Agency:
 - CVRWQCB (Lead Agency)

This site will undergo remediation and cleanup prior to construction on the Development Area to ensure all toxic substances and potential pollutants are removed. Remedial soil excavation is

proposed for the remediation where organochlorine pesticide and metals concentration exceeded commercial/industrial ESL values to adequately remove contaminants before development of the proposed project can begin. The remedial work will be performed by a licensed hazardous materials contractor in accordance with all applicable laws and regulations. Prior to initiation of any remedial soil extraction work, the property owner or remediation contractor will obtain any required permits, including a grading permit if necessary. The owner or contractor will also determine whether a Dust Control Plan is required for the remedial work and will process one, if necessary, per San Joaquin Valley Air Pollution Control District (SJVAPCD) regulations. Stormwater controls will also be implemented as necessary to prevent any surface water or storm water that contacts exposed impacted soils from discharging from the work site or from entering storm drain or sewer systems.

Following soil excavation activities, soil samples will be collected from the limits of the soil excavation areas to verify that soils at the limits of the excavation do not contain contaminants above the clean-up levels established. Stockpiled soil samples will also be taken and tested to determine appropriate disposal methods. Once testing of removed soils is completed, all equipment that comes into contact with impacted soils would be decontaminated. The extent of future backfilling of the remedial excavations is unknown and will depend to some degree on the grading details of the development project. Much of the excavation area is anticipated to be only one-foot deep and may not necessitate backfilling.

Based on the planned remedial soil removal work, it is anticipated that remaining onsite soils will not contain the chemicals of concern at concentrations above commercial/industrial ESL values. As such, no ongoing maintenance at the Remediation Area will be necessary following successful completion of remediation work.

As stated in the City's General Plan and General Plan EIR, developers are required to conduct the necessary level of environmental investigation prior to project approval to ensure that development sites would not affect the environment or the health or safety of future property owners (Objective SA-4.1, P2). The General Plan EIR concluded that this policy would reduce the potential impact to a less-than-significant level. Therefore, implementation of the proposed project would result in a **less than significant** impact relative to this environmental topic following successful remedial soil excavation processes.

Response e): Less than Significant. The Federal Aviation Administration (FAA) establishes distances of ground clearance for take-off and landing safety based on such items as the type of aircraft using the airport.

The Tracy Municipal Airport is the closest airport to the Project site, located approximately 5.4 miles to the southwest. The Airport is a general aviation airport owned by the City and managed by the Public Works Department. Guidelines for Airport Land Use were developed by SJCOG Airport Land Use Commission in 2013. Furthermore, the City of Tracy adopted an Airport Master Plan in 1998, analyzing the impacts to safety on surrounding development from the Tracy Municipal Airport.

The probability of an aircraft accident is highest along the extended runway centerline, and within one mile of the runway end. According to SJCOG Guidelines there are seven zones in which land use restrictions apply due to proximity to the airport:

1. Zone 1 Runway Protection Zone (RPZ)
2. Zone 2 Inner Approach/Departure Zone (IADZ)
3. Zone 3 Inner Turning Zone (ITZ)
4. Zone 4 Outer Approach/Departure Zone (OADZ)
5. Zone 5 Sideline Safety Zone (SSZ)
6. Zone 7 Traffic Pattern Zone (TPZ)
7. Zone 8 Airport Influence Area (AIA)

Land use constraints in these zones become progressively less restrictive from the RPZ to the TPZ. The proposed project is not located within any of the safety zones. The proposed project is not located within one mile of the airport, nor along the extended runway centerline, or within an AIA. Additionally, there are no private airstrips within the vicinity of the Project site. The proposed project consists of single story and two story structures, and does not propose any structures of substantial height that would protrude into active airspace. Therefore safety hazards related to the project's proximity to the Tracy Municipal Airport are **less than significant**.

Response f): No Impact. The General Plan includes policies that require the City to maintain emergency access routes that are free of traffic impediments (Objective SA-6.1, P1 and A2). The proposed project does not include any actions that would impair or physically interfere with an adopted emergency response plan or emergency evacuation plan. The project involves the development of industrial land uses within an urbanized environment and would not interfere with any emergency response or evacuation plans. Implementation of the proposed project would result in **no impact** on this environmental topic.

Response g): Less than Significant. The risk of wildfire is related to a variety of parameters, including fuel loading (vegetation), fire weather (winds, temperatures, humidity levels and fuel moisture contents) and topography (degree of slope). Steep slopes contribute to fire hazard by intensifying the effects of wind and making fire suppression difficult. Fuels such as grass are highly flammable because they have a high surface area to mass ratio and require less heat to reach the ignition point, while fuels such as trees have a lower surface area to mass ratio and require more heat to reach the ignition point.

The City has areas with an abundance of flashy fuels (i.e. grassland) in the outlying residential parcels and open lands that, when combined with warm and dry summers with temperatures often exceeding 100 degrees Fahrenheit, create a situation that results in higher risk of wildland fires. Most wildland fires are human caused, so areas with easy human access to land with the appropriate fire parameters generally result in an increased risk of fire.

The California Department of Forestry has designated the southwestern edge of the City as having a moderate wildland fire potential. This is predominately a result of the hills and grassland

habitat that persists. The identified moderate wildland fire potential area in and around Tracy does not include the Project site. Since the Project site is not located within a designated wildfire hazard area, this is a **less than significant** impact.

X. HYDROLOGY AND WATER QUALITY -- WOULD THE PROJECT:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?		X		
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
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:			X	
(i) result in substantial erosion or siltation on- or off-site;			X	
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;			X	
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems to provide substantial additional sources of polluted runoff; or			X	
(iv) impede or redirect flood flows?			X	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			X	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	

RESPONSES TO CHECKLIST QUESTIONS

Response a): Less than Significant with Mitigation. Wastewater generated by the proposed project would be conveyed to the Tracy Wastewater Treatment Plan (WWTP) for treatment and disposal. The City's wastewater collection system consists of gravity sewer lines, pump stations and the WWTP. Wastewater flows toward the northern part of the City where it is treated at the WWTP and then discharged into the Old River in the southern Sacramento-San Joaquin Delta. The project's potential to violate a water quality standard or waste discharge requirement is related to the treatment of wastewater generated by the project, and the quality of stormwater runoff generated at the Project site. These two issues are addressed below.

In 2008 the City expanded its wastewater treatment capacity to 10.8 million gallons per day (mgd). The City's Wastewater Treatment Plant (WWTP) currently treats approximately 9.0 mgd

of wastewater. The City's WWTP provides secondary-level treatment of wastewater followed by disinfection. Treated effluent from the WWTP is conveyed to a submerged diffuser for discharge into the Old River. The WWTP has an NPDES permit for discharge into the Old River from the State Regional Water Quality Control Board.

In order to estimate the wastewater generation for the project, a wastewater flow factor of 750 gallons per acre per day of wastewater (gpd) was used. This flow factor is provided in the City's 2023 Wastewater Master Plan (Table 4.5). Based on this generation factor, it is estimated that the proposed project would generate up to 39,240 gpd, or 0.039 mgd of wastewater.

The addition of 0.039 mgd of wastewater would not exceed the treatment capacity of the City's WWTP or violate waste discharge requirements under the City's National Pollutant Discharge Elimination System (NPDES) permit. Additionally, the Wastewater System Analysis confirms that there is sufficient capacity in the existing nearby wastewater gravity sewer lines and pump stations to accommodate the proposed project. As such, the project would not cause, or contribute to, a violation of wastewater quality standards or waste discharge requirements.

In order to ensure that stormwater runoff from the Project site does not adversely increase pollutant levels in adjacent surface waters and stormwater conveyance infrastructure, the City requires the application of BMPs to effectively reduce pollutants from stormwater leaving the site during both the construction and operational phases of the project. Additionally, projects are required to prepare a Stormwater Pollution Prevention Plan (SWPPP). The final storm drainage infrastructure plan for the project would also be submitted to the City for review and approval.

The collection of fees and determined fair share fee amounts are adopted by the City as Conditions of Approval (COAs) for all new development projects prior to project approval. The payment of applicable development impact fees by the proposed project would ensure that the project pays its fair-share of capital improvement fees towards future system expansions, as identified in the Tracy Wastewater Master Plan. Additionally, through compliance with the NPDES permit requirements, and compliance with the SWPPP, the proposed project would not result in a violation of any water quality standards or waste discharge requirements. Therefore, through compliance with the NPDES, the SWPPP required by Mitigation Measure HYD-1, and the final storm drainage infrastructure plan required by Mitigation Measure HYD-2, impacts are considered **less than significant**.

Mitigation Measure(s)

Mitigation Measure HYD-1: *The project applicant 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.

Mitigation Measure HYD-2: *Prior to issuance of building permits, the project applicant shall submit a detailed storm drainage infrastructure plan to the City of Tracy Community and Economic Development Department for review and approval. The project's storm drainage infrastructure plans shall, to the satisfaction of the City Engineer, demonstrate adequate infrastructure capacity to collect and direct all stormwater generated on the Project site within onsite retention/detention facilities to the City's existing stormwater conveyance system, and demonstrate that the project would not result in on- or off-site flooding impacts. The project shall also pay all applicable development impact fees, which would include funding for offsite Citywide storm drainage infrastructure improvements identified in the City of Tracy Citywide Storm Drainage Master Plan.*

Response b): Less than Significant. The proposed project would not result in the construction of new groundwater wells, nor would it increase existing levels of groundwater pumping. The proposed project would be served by the City's municipal water system. The City of Tracy uses several water sources, including the US Bureau of Reclamation, the South County Water Supply Project (SCWSP), and groundwater.

The City's existing Groundwater Management Policy prohibits groundwater extraction to exceed 9,000 AF (the determined safe yield). The General Plan contains policies to address groundwater use and conservation that will assist in avoiding impacts to groundwater sources. The City will use surface water supplies to the greatest extent feasible to reduce reliance on groundwater (Objective PF-6.1, P3) and to reserve groundwater supplies for emergency use, such as droughts or short-term shortages (Objective PF-6.4, P1). As a result of adopted City policies and General Plan policies, a less-than-significant groundwater impact was determined by the General Plan EIR. The proposed project is consistent with land use designation and density analyzed under the General Plan EIR. Thus, the proposed project potential for groundwater depletion is consistent with the General Plan EIR finding of less than significant.

Groundwater recharge occurs primarily through percolation of surface waters through the soil and into the groundwater basin. The addition of significant areas of impervious surfaces (such as roads, parking lots, buildings, etc.) can interfere with this natural groundwater recharge process. Upon full project buildout, portions of the Project site would be covered in impervious surfaces, which would limit the potential for groundwater percolation to occur on the Project site. However, given the relatively large size of the groundwater basin in the Tracy area, the areas of impervious surfaces added as a result of project implementation will not adversely affect the recharge capabilities of the local groundwater basin. Additionally, the project would maintain pervious surfaces within the on-site landscaping and retention basins. These pervious areas could maintain opportunities for groundwater recharge.

Because the City has adequate existing water service capacity to serve the project, and the limited scope of impervious surface coverage (when compared to the larger groundwater basin), the proposed project would result in **less than significant** impacts related to depletion of groundwater supplies and interference with groundwater recharge.

Response c): Less than Significant. When land is in a natural or undeveloped condition, soils, mulch, vegetation, and plant roots absorb rainwater. This absorption process is called infiltration or percolation. Much of the rainwater that falls on natural or undeveloped land slowly infiltrates the soil and is stored either temporarily or permanently in underground layers of soil. When the soil becomes completely soaked or saturated with water or the rate of rainfall exceeds the infiltration capacity of the soil, the rainwater begins to flow on the surface of land to low lying areas, ditches, channels, streams, and rivers. Rainwater that flows off of a site is defined as storm water runoff. When a site is in a natural condition or is undeveloped, a larger percentage of rainwater infiltrates into the soil and a smaller percentage flows off the site as storm water runoff.

The infiltration and runoff process is altered when a site is developed with urban uses. Houses, buildings, roads, and parking lots introduce asphalt, concrete, and roofing materials to the landscape. These materials are relatively impervious, which means that they absorb less rainwater. As impervious surfaces are added to the ground conditions, the natural infiltration process is reduced. As a result, the volume and rate of storm water runoff increases. The increased volumes and rates of storm water runoff may result in flooding if adequate storm drainage facilities are not provided.

There are no rivers, streams, or water courses located on or immediately adjacent to the Project site. As such, there is no potential for the project to alter a water course, which could lead to on or offsite flooding. Drainage improvements associated with the Project site would be located on the Project site, and the project would not alter or adversely impact offsite drainage facilities.

Development of the Project site would place impervious surfaces on portions of the 52.32-acre Project site. Development of the Project site would potentially increase local runoff production, and would introduce constituents into storm water that are typically associated with urban runoff. These constituents include heavy metals (such as lead, zinc, and copper) and petroleum hydrocarbons. BMPs will be applied to the proposed site development to limit the concentrations of these constituents in any site runoff that is discharged into downstream facilities to acceptable levels. Stormwater flows from the Project site would be directed to the two proposed retention basins by a new stormwater conveyance system.

In order to ensure that stormwater runoff from the Project site does not adversely increase pollutant levels in adjacent surface waters and stormwater conveyance infrastructure, Mitigation Measure HYD-1 requires the preparation of a SWPPP. As described previously, the SWPPP would require the application of BMPs to effectively reduce pollutants from stormwater leaving the site during both the construction and operational phases of the project.

Additionally, the project is subject to the requirements of Chapter 11.34 of the Tracy Municipal Code – Stormwater Management and Discharge Control. The purpose of this Chapter is to *“Protect and promote the health, safety and general welfare of the citizens of the City by controlling non-stormwater discharges to the stormwater conveyance system, by eliminating discharges to the stormwater conveyance system from spills, dumping, or disposal of materials other than stormwater, and by reducing pollutants in urban stormwater discharges to the maximum extent practicable.”*

This chapter is intended to assist in the protection and enhancement of the water quality of watercourses, water bodies, and wetlands in a manner pursuant to and consistent with the Federal Water Pollution Control Act (Clean Water Act, 33 USC Section 1251 et seq.), Porter-Cologne Water Quality Control Act (California Water Code Section 13000 et seq.) and National Pollutant Discharge Elimination System ("NPDES") Permit No. CAS000004, as such permit is amended and/or renewed.

New development projects in the City of Tracy are required to provide site-specific storm drainage solutions and improvements that are consistent with the overall storm drainage infrastructure approach presented in the City of Tracy Citywide Storm Drainage Master Plan. The project applicant is required to submit a detailed storm drainage infrastructure plan to the City of Tracy Community and Economic Development Department for review and approval. The project's storm drainage infrastructure plans must demonstrate adequate infrastructure capacity to collect and direct all stormwater generated on the Project site within the on-site retention facilities to the City's existing stormwater conveyance system and demonstrate that the project would not result in on- or off-site flooding impacts.

The project is also required to pay all applicable development impact fees, which would include funding for offsite Citywide storm drainage infrastructure improvements identified in the City of Tracy Citywide Storm Drainage Master Plan. The collection of fees and determined fair share fee amounts are adopted by the City as COAs for all new development projects prior to project approval. The payment of applicable development impact fees by the proposed project would ensure that the project pays its fair-share of capital improvement fees towards future system expansions, as identified in the Citywide Storm Drainage Master Plan.

In order to ensure that stormwater runoff from the Project site does not adversely increase pollutant levels in adjacent surface waters and stormwater conveyance infrastructure, or otherwise degrade water quality, Mitigation Measure HYD-1 requires the preparation of a SWPPP, and structural BMPs. As described above, the SWPPP would require the application of BMPs to effectively reduce pollutants from stormwater leaving the site, which would ensure that stormwater runoff does not adversely increase pollutant levels, and would reduce the potential for disturbed soils and ground surfaces to result in erosion and sediment discharge into adjacent surface waters during construction and operational phases of the project. The implementation of this requirement would reduce this impact to a less than significant level.

Ultimately, in order to ensure that stormwater runoff generated at the Project site as a result of new impervious surfaces does not exceed the capacity of the existing or planned stormwater drainage system, Mitigation Measure HYD-2 above requires the project applicant to submit a detailed storm drainage infrastructure plan to the City of Tracy Community and Economic Development Department for review and approval. The project's storm drainage infrastructure plans shall, to the satisfaction of the City Engineer, demonstrate adequate infrastructure capacity to collect and direct all stormwater generated on the Project site within onsite retention/detention facilities to the City's existing stormwater conveyance system, and demonstrate that the project would not result in on- or off-site flooding impacts. The implementation of this requirement would reduce this impact to a less than significant level.

Through the payment of all applicable fees, and the implementation of Mitigation Measure HYD-1 and 11, would ensure that this impact is **less than significant**.

Response d): Less than Significant. The 100-year floodplain denotes an area that has a one percent chance of being inundated during any particular 12-month period.

Floodplain zones are determined by the Federal Emergency Management Agency (FEMA) and used to create Flood Insurance Rate Maps (FIRMs). These tools assist cities in mitigating flooding hazards through land use planning. FEMA also outlines specific regulations for any construction, whether residential, commercial, or industrial within 100-year floodplains.

The Project site is not located within an inundation risk area, nor are there any dam inundation areas within the City of Tracy, according to the California Department of Water Resources, Division of Safety of Dams.¹

The safety of dams in California is stringently monitored by the California Department of Water Resources, Division of Safety of Dams (DSD). The DSD is responsible for inspecting and monitoring the dam in perpetuity. The proposed project would not result in actions that could result in a higher likelihood of dam failure at San Luis Reservoir and New Melones Dams. There will always be a remote chance of dam failure that results in flooding of portions of the City. However, the Project site lies outside of this risk area.

There are no significant bodies of water near the Project site that could result in the occurrence of a seiche or tsunami. Additionally, the Project site and the surrounding areas are relatively flat, which precludes the possibility of mudflows occurring on the Project site. This is a **less than significant** impact.

Response e): Less than Significant. The Water Quality Control Plan for the Sacramento River and San Joaquin River Basins and the Tracy Subbasin Groundwater Sustainability Plan are the two guiding documents for water quality and sustainable groundwater management in the project area.

Water Quality Control Plan for the Sacramento River and San Joaquin River Basins

The Water Quality Control Plan for the Sacramento River and San Joaquin River Basins, includes a summary of beneficial water uses, water quality objectives needed to protect the identified beneficial uses, and implementation measures. The preparation and adoption of water quality control plans (Basin Plans) is required by the California Water Code (Section 13240) and supported by the Federal Clean Water Act. Section 303 of the Clean Water Act requires states to adopt water quality standards which "consist of the designated uses of the navigable waters involved and the water quality criteria for such waters based upon such uses." The Basin Plan establishes water quality standards for all the ground and surface waters of the region. The term "water quality standards," as used in the Federal Clean Water Act, includes both the beneficial

¹ California Department of Water Resources, Division of Safety of Dams, 2024. *California Dam Breach Inundation Maps*.

uses of specific water bodies and the levels of quality that must be met and maintained to protect those uses. The Basin Plan includes an implementation plan describing the actions by the RWQCB and others that are necessary to achieve and maintain the water quality standards.

In order to ensure that stormwater runoff from the Project site does not adversely increase pollutant levels in adjacent surface waters and stormwater conveyance infrastructure, or otherwise degrade water quality, a SWPPP, and structural BMPs would be required. The SWPPP would require the application of BMPs to effectively reduce pollutants from stormwater leaving the site, which would ensure that stormwater runoff does not adversely increase pollutant levels, and would reduce the potential for disturbed soils and ground surfaces to result in erosion and sediment discharge into adjacent surface waters during construction and operational phases of the project. Additionally, as described previously, the project will be required to submit a detailed storm drainage infrastructure plan that demonstrates the project incorporates site design measures, landscape features, and engineered treatment facilities (typically bioretention facilities) that will minimize imperviousness, retain or detain stormwater, slow runoff rates, and reduce pollutants in post-development runoff. Additionally, the project will be required to comply with Chapter 11.34 of the Tracy Municipal Code, Stormwater Management and Discharge Control, which outlines the City requirements for stormwater management and discharge control, including controlling non-stormwater discharges to the stormwater conveyance system, eliminating discharges to the stormwater conveyance system from spills, dumping or disposal of materials other than stormwater, and reducing pollutants in urban stormwater discharges to the maximum extent practicable.

Tracy Subbasin Groundwater Sustainability Plan

The Tracy Subbasin Groundwater Sustainability Plan was previously adopted by the City of Tracy City Council. As discussed previously, upon full project buildout, portions of the Project site would be covered in impervious surfaces, which would limit the potential for groundwater percolation to occur on the Project site. However, given the relatively large size of the groundwater basin in the Tracy area, the areas of impervious surfaces added as a result of project implementation will not adversely affect the recharge capabilities of the local groundwater basin. Additionally, the project would maintain pervious surfaces within the on-site landscaping and retention basins. These pervious areas could maintain opportunities for groundwater recharge.

Additionally, Mitigation Measure HYD-1 requires the preparation of a SWPPP, and structural BMPs. The SWPPP would require the application of BMPs to effectively reduce pollutants from stormwater leaving the site, which would ensure that stormwater runoff does not adversely increase pollutant levels, and would reduce the potential for disturbed soils and ground surfaces to result in erosion and sediment discharge into adjacent surface waters during construction and operational phases of the project. Additionally, the project will be required to submit a stormwater control plan that demonstrates the project incorporates site design measures, landscape features, and engineered treatment facilities (typically bioretention facilities) that will minimize imperviousness, retain or detain stormwater, slow runoff rates, and reduce pollutants in post-development runoff. The project will be required to comply with Chapter 11.34 of the Tracy Municipal Code, Stormwater Management and Discharge Control, which outlines the City

requirements for stormwater management and discharge control, including controlling non-stormwater discharges to the stormwater conveyance system, eliminating discharges to the stormwater conveyance system from spills, dumping or disposal of materials other than stormwater, and reducing pollutants in urban stormwater discharges to the maximum extent practicable.

Conclusion

Overall, implementation of the proposed project would have a **less than significant** impact related to conflicts with the Basin Plan and the Tracy Subbasin Groundwater Sustainability Plan.

XI. LAND USE AND PLANNING - WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Physically divide an established community?				X
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			X	

RESPONSES TO CHECKLIST QUESTIONS

Response a): No Impact. The Project site is surrounded by industrial uses to the south and the west, and agricultural uses to the north and east. The project would be consistent and compatible with the surrounding land uses, and would not divide an established community. There is **no impact**.

Response b): Less than Significant. The City Tracy General Plan Project site land use designation for the Project site is Industrial (consistent with the proposed project) and the site is within the Northeast Industrial Specific Plan Area. Specific uses allowed in the Industrial land use designation category range from flex/office space to manufacturing to warehousing and distribution. According to the City's General Plan, Industrial parcels should have a maximum floor-area-ratio (FAR) of 0.5. Building A has an FAR of 0.47 while Building B has an FAR of 0.20. The average FAR of the project would be 0.34, staying below the maximum FAR of 0.5. Industrial uses are located to provide proper truck access, buffering from incompatible uses and proximity with rail corridors and transit links.

The Project site is currently zoned Northeast Industrial Specific Plan. The Northeast Industrial Specific Plan addresses 870 acres in the northeast corner of the City. Anticipated land uses include a mixture of manufacturing, warehousing, and distribution uses including rail-dependent industries and "flex-tech" light industrial.

The proposed use and density on the Project site is consistent with the General Plan designation of Industrial and is consistent with the Northeast Industrial Specific Plan Zoning designation. The project's consistency with other General Plan policies that provide environmental protections are addressed within the relevant sections of this document. This is a **less than significant** impact.

XII. MINERAL RESOURCES -- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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?				X
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?				X

RESPONSES TO CHECKLIST QUESTIONS

Responses a), b): No Impact. As described in the Tracy General Plan EIR, the main mineral resources found in San Joaquin County, and the Tracy Planning Area, are sand and gravel (aggregate), which are primarily used for construction materials like asphalt and concrete. According to the California Geological Survey (CGS) evaluation of the quality and quantity of these resources, the most marketable aggregate materials in San Joaquin County are found in three main areas:

- In the Corral Hollow alluvial fan deposits south of Tracy
- Along the channel and floodplain deposits of the Mokelumne River
- Along the San Joaquin River near Lathrop

Figure 4.8-1 of the General Plan EIR identifies Mineral Resource Zones (MRZs) throughout the Tracy Planning Area. The Project site is located within an area designated as MRZ-1. The MRZ-1 designation applies to areas where adequate information indicates that no significant mineral deposits are present, or where there is little likelihood for their presence. There are not substantial aggregate materials located within the Project site. Therefore, the project would not result in the loss of availability of a known mineral resource. There is **no impact**.

XIII. NOISE -- WOULD THE PROJECT RESULT IN:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Generation of a 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?	X			
b) Generation of excessive groundborne vibration or groundborne noise levels?	X			
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two 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?				X

RESPONSES TO CHECKLIST QUESTIONS

Responses a)-b): Potentially Significant. Based on existing and projected noise levels along roadways, and the potential for noise generated during project construction and operational activities, it has been determined that the potential impacts from noise caused by the proposed project will require a detailed analysis in the EIR. As such, the lead agency will examine each of the two potentially significant environmental issues listed in the checklist above in the EIR and will decide whether the proposed project has the potential to have a significant impact from noise. At this point a definitive impact conclusion for each of these environmental topics will not be made, rather both are considered **potentially significant** until a detailed analysis is prepared in the EIR.

The EIR will identify sensitive receptors, noise impacts, and attenuation of noise related impacts. The noise study will also include an assessment of construction noise and vibration impacts. The noise analysis will identify the noise level standards contained in the City of Tracy General Plan Noise Element and Municipal Code (Noise Control Ordinance, Chapter 4.12 Article 9), as well as any germane state, and federal standards. Continuous (24-hour) and short-term noise measurements will be performed in the project site and in the project vicinity in order to quantify existing ambient noise levels from existing community noise sources.

The EIR will provide an estimate of existing traffic noise levels adjacent to the project site roadways through application of accepted traffic noise prediction methodologies. Noise sources from the project will be quantified through noise level measurements. Proposed on-site mobile and stationary noise sources will be evaluated. This will include noise generating equipment, such as HVAC systems, generators, etc., as well as mobile noise sources such as truck loading/docking/idling. The EIR will include thresholds of significance, a project-level impact analysis, cumulative impact analysis, and a discussion of feasible mitigation measures that should be implemented to reduce any potential impacts associated with noise.

Response c): No Impact. The project site is located approximately 7 miles from the nearest airport (the Tracy Municipal Airport), and is outside of the contours of the Tracy Municipal Airport land use plan. Therefore, there is **no impact** relative to this topic. This topic does not warrant additional analysis and will not be addressed further in the EIR.

XIV. POPULATION AND HOUSING -- WOULD THE PROJECT:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
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)?			X	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

RESPONSES TO CHECKLIST QUESTIONS

Response a): Less than Significant. The proposed warehouse would not induce population growth, either directly or indirectly. The warehouse would not generate significant employment opportunities in Tracy and would not expand the job base such that population growth may occur.

The potential for the project to directly induce population growth in the City of Tracy is not a significant impact in and of itself. Population growth can result in impacts to other environmental topics, such as traffic, service demands, etc. The employment growth that would occur as a result of approval and development of the proposed project was considered in the Tracy General Plan and General Plan EIR. The proposed project is consistent with the land use designation for the site that was addressed in the General Plan EIR, and the environmental effects of the employment growth generated by the project were considered in the analysis of buildout of the Tracy General Plan. Additionally, as described throughout this environmental document, the employment growth attributable to the proposed project would not result in any significant site-specific environmental impacts to other environmental topics that cannot be mitigated to a less than significant level. Therefore, this impact is **less than significant**, as demonstrated throughout this document.

Response b): No Impact. There are no residences located on the proposed Project site.

The City Tracy General Plan land use designation for the Project site is Industrial and the site is within the Northeast Industrial Specific Plan Area. Specific uses allowed in the Industrial land use designation category range from flex/office space to manufacturing to warehousing and distribution. The Project site is currently zoned Northeast Industrial Specific Plan. The Northeast Industrial Specific Plan addresses 870 acres in the northeast corner of the City. Anticipated land uses include a mixture of manufacturing, warehousing, and distribution uses including rail-dependent industries and “flex-tech” light industrial.

The proposed Project is consistent with the land use designation for the site that was addressed in the General Plan and the Northeast Industrial Specific Plan, and the environmental effects of the displacement generate by the Project was considered in the analysis of buildout of the Tracy General Plan. Given that there are no residences on, or in the immediate vicinity of, the proposed

Project site, there is no anticipated displacement of existing residents and therefore the Project would have **no impact**.

XV. PUBLIC SERVICES

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Would the project 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?			X	
ii) Police protection?			X	
iii) Schools?			X	
iv) Parks?			X	
v) Other public facilities?			X	

*RESPONSES TO CHECKLIST QUESTIONS***Response a):**

i) Fire Protection and Emergency Medical Services: Less than Significant. The Tracy Fire Department, as a member agency of the South County Fire Authority, provides fire protection, life safety, and emergency response services to 167 square miles of the southern part of San Joaquin County. In 1999, the South County Fire Authority was established to more effectively and efficiently serve the City of Tracy, the Tracy Rural Fire Protection District (FPD), and the Mountain House Community Services District (CSD).

The Fire Authority currently operates seven fire stations and an administrative office. Twenty-four hour-a-day staffing is provided with five paramedic engine companies, two basic life support engine companies, and one ladder truck company. Three fire stations are within the incorporated area of the City of Tracy, three are in the surrounding rural Tracy area, and one is located in the planned Community of Mountain House.

Medical transport is provided by private ambulance. American Medical Response is the exclusive emergency ambulance service provider in San Joaquin County.

The Tracy Fire Department conducted a Standards of Response Coverage study in late 2007. Findings of the study indicated that the Department had challenges in meeting its established response time objectives in the areas of the West Valley Mall and Downtown Tracy utilizing existing resources. Two new facilities were opened August 5, 2014, to replace Fire Stations 92 & 96. The new facilities allow the fire department to serve the greater community of Tracy more effectively within the established response time standard of 6.5 minutes.

Since November 2008, the Fire Department has expanded its provision of Advanced Life Support Services to all of its fire stations. Emergency medical services in Tracy and the surrounding areas

are reported to be good, as Tracy is one of only three fire departments in San Joaquin County that provide Advanced Life Support services.

Recognizing the potential need for increases in fire protection and emergency medical services, the City's General Plan includes policies to ensure that adequate related facilities are funded and provided to meet future growth (Objective PF-1.1, P1). This policy will be implemented through the review of all new projects within the City, prior to development, and through the collection of development impact fees for the funding of facilities.

Implementation of the proposed project would not adversely impact existing fire and emergency services within the City and would not require the construction of new fire protection facilities. Impact fees from new development are collected based upon projected impacts from each development. The adequacy of impact fees is reviewed on an annual basis to ensure that the fee is commensurate with the service. Payment of the applicable impact fees by the project applicant as COAs prior to project approval, and ongoing revenues that would come from property taxes, sales taxes, and other revenues generated by the project, would fund capital and labor costs associated with fire protection services.

In order to provide adequate fire protection and suppression services to the Project site, the Tracy Fire Department must have access to adequate onsite hydrants with adequate fire-flow pressure available to meet the needs of fire suppression units. The final site plans and development specifications developed for the proposed project will indicate the location and design specifications of the fire hydrants that will be required within the Project site. Therefore, this is considered a **less than significant** impact.

ii) Police Protection: Less than Significant. The Tracy Police Department provides police protection services to the City of Tracy. Its headquarters are located at 1000 Civic Center Drive, approximately 2.0 miles southwest of the Project site. There are no satellite offices or plans to construct any in the near future.

The Department divides calls into three categories, Priority 1, 2, and 3 calls. Priority 1 calls are defined as life threatening situations. Priority 2 calls are not life threatening, but require immediate response. Priority 3 calls cover all other calls received by the police. Average response time for Priority 1 calls within City limits is approximately six to eight minutes. Response time for Priority 2 and 3 calls is, on average, 22 minutes.

The Tracy Police Department provides mutual aid to the San Joaquin County Sheriff's office, and vice versa, when a situation exceeds the capabilities of either department. Mutual aid is coordinated through the San Joaquin County Sheriff.

Impact fees from new developments are collected based upon projected impacts from each development by the City as COAs prior to project approval. The adequacy of impact fees is reviewed on an annual basis to ensure that the fee is commensurate with the service. Payment of the applicable impact fees by the project applicant, and ongoing revenues that would come from property taxes, and other revenues generated by the project, would fund capital and labor costs associated with police services.

It is not anticipated that implementation of the proposed project would result in significant new demand for police services. Project implementation would not require the construction of new police facilities to serve the Project site, nor would it result in impacts to the existing response times and existing police protection service levels. Furthermore, the City's General Plan ensures the City maintains adequate police staffing, performance levels and facilities to serve Tracy's existing population as well as any future growth (Goal PF-2, policy P.1). Therefore, this is considered a **less than significant** impact.

iii) Schools: Less than Significant. Implementation of the proposed project would result in modest employment growth within the City of Tracy, which may increase enrollment at schools within the Tracy Unified School District incrementally. The Tracy Unified School District collects impact fees from new developments under the provisions of SB 50. Payment of the applicable impact fees by the project applicant, and ongoing revenues that would come from taxes, would fund capital and labor costs associated with school services. The adequacy of fees is reviewed on an annual basis to ensure that the fee is commensurate with the service. Payment of the applicable impact fees by the project applicant, and ongoing revenues that would come from property taxes, sales taxes, and other revenues generated by the project, would fund improvements associated with school services and would ensure that project impacts to school services are **less than significant**.

iv) Parks: Potential project impacts to parks and recreational facilities are addressed in the following section of this document.

v) Other Public Facilities: Less than Significant. Other public facilities in the City of Tracy include libraries, hospitals, and cultural centers such as museums and music halls. The proposed project may increase demand on these facilities in a limited capacity. The City of Tracy General Plan requires new development to pay its fair share of the costs of public buildings by collecting the Public Buildings Impact Fee. The Public Buildings Impact fee is used by the City to expand public services and maintain public buildings, including the Civic Center and libraries in order to meet the increased demand generated by new development. Payment of the applicable impact fees by the project applicant, as COAs prior to project approval, and ongoing revenues that would come from taxes, would ensure that project impacts to libraries and public buildings are **less than significant**.

XVI. RECREATION

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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?			X	
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?			X	

RESPONSES TO CHECKLIST QUESTIONS

Responses a), b): Less than Significant. The proposed Project would not increase demand for parks and recreational facilities within the City of Tracy and would not increase the use of the City's existing parks and recreation system. The City of Tracy requires the payment of the Project's fair share in-lieu parks fees, as required by the City's General Plan. The collection of fees and determined fair share fee amounts are adopted by the City as COAs for all new development projects prior to project approval. Fees paid aid in the development of new park space and maintenance as required, to ensure continued high quality park facilities for all City residents. As such, this is a **less than significant** impact.

XVII. TRANSPORTATION -- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	X			
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	X			
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	X			
d) Result in inadequate emergency access?	X			

RESPONSES TO CHECKLIST QUESTIONS

Response a-d): Potentially Significant. The proposed Project includes the development of a use that will increase traffic on existing and planned roadways. Based on existing and projected traffic volume levels along roadways and potential increases in vehicle miles travelled (VMT) as a result of the project, it has been determined that traffic impacts will require a detailed analysis in the EIR. As such, the lead agency will examine each of the environmental issues listed in the checklist above in the EIR and will determine whether the proposed Project has the potential to have a significant impact from traffic. At this point a definitive impact conclusion for each of these environmental topics will not be made, rather all are considered **potentially significant** until a detailed analysis is conducted in the EIR.

The EIR will include a Traffic Impact Analysis (TIA) to address the impacts of the proposed project on the surrounding transportation system including the roadways, transit service, pedestrian facilities, and bicycle facilities. The TIA will be conducted to address compliance with the City's General Plan and other requirements under CEQA. It will be prepared following applicable guidelines of the City of Tracy, San Joaquin County, and Caltrans, as applicable. The EIR will analyze total passenger vehicle and heavy-duty truck trips and associated VMT that are modeled to be generated by the proposed project. Potential impacts associated with site access, on-site circulation, and consistency with CEQA Guidelines section 15064.3, subdivision (b) will also be addressed in the EIR. Significant impacts will be identified in accordance with the established criteria, and mitigation measures will be identified to lessen the significance of any potential impacts.

The EIR will provide an analysis including the thresholds of significance, a project-level impact analysis, cumulative impact analysis, and a discussion of feasible mitigation measures that should be implemented to reduce any significant impacts associated with transportation.

XVIII. TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project 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:				
a) 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)?			X	
b) 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resources to a California Native American tribe.			X	

RESPONSES TO CHECKLIST QUESTIONS

Responses a-b): Less than Significant. There is a potential for the discovery of prehistoric, ethnohistoric, or historic archaeological sites that may meet the definition of Tribal Cultural Resources (TCRs). Although no TCRs have been documented on the Project site, the Project is in a region where significant cultural resources have been recorded and there remains a potential that undocumented archaeological resources that may meet the TCR definition could be unearthed or otherwise discovered during ground-disturbing and construction activities. Examples of significant archaeological discoveries that may meet the TCR definition would include villages and cemeteries. Due to the possible presence of undocumented TCRs within the Project site, construction-related impacts on tribal cultural resources may occur.

Mitigation Measure CUL-1 in Section V, Cultural Resources, would require appropriate steps to preserve and/or document any previously undiscovered resources that may be encountered during construction activities, including human remains. Implementation of this requirement would reduce this impact to a **less than significant** level.

XIX. UTILITIES AND SERVICE SYSTEMS -- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
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 projects projected demand in addition to the providers existing commitments?			X	
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 reductions goals?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

RESPONSES TO CHECKLIST QUESTIONS

Responses a), c): Less than Significant. Wastewater generated by the proposed project would be conveyed to the Tracy Wastewater Treatment Plan (WWTP) for treatment and disposal. The City's wastewater collection system consists of gravity sewer lines, pump stations and the WWTP. Wastewater flows toward the northern part of the City where it is treated at the WWTP and then discharged into the Old River in the southern Sacramento-San Joaquin Delta.

The City's WWTP provides secondary-level treatment of wastewater followed by disinfection. Treated effluent from the WWTP is conveyed to a submerged diffuser for discharge into the Old River. The WWTP has an NPDES permit for discharge into the Old River from the State Regional Water Quality Control Board. The City of Tracy expanded the treatment capacity to 10.8 million gallons per day (mgd) in 2008.

The Tracy General Plan EIR determined that no significant wastewater-related impacts were identified as a result of buildout of the General Plan. Because the project is consistent with the intended uses allowed under the General Plan no impacts beyond those identified should result from implementation of the proposed project.

In 2008 the City expanded its wastewater treatment capacity to 10.8 mgd. The City's WWTP currently treats approximately 9.0 mgd of wastewater. The City's WWTP provides secondary-

level treatment of wastewater followed by disinfection. Treated effluent from the WWTP is conveyed to a submerged diffuser for discharge into the Old River. The WWTP has an NPDES permit for discharge into the Old River from the State Regional Water Quality Control Board.

As noted previously, it is estimated that the proposed project would generate up to 39,240 gpd, or 0.039 mgd of wastewater. The addition of 0.039 mgd of wastewater would not exceed the treatment capacity of the City's WWTP or violate waste discharge requirements under the City's NPDES permit. Additionally, the Wastewater System Analysis confirms that there is sufficient capacity in the existing nearby wastewater gravity sewer lines and pump stations to accommodate the proposed project. As such, the project would not cause, or contribute to, a violation of wastewater quality standards or waste discharge requirements.

The City has adequate capacity to serve the project's projected demand for wastewater treatment services in addition to its existing commitments, and no improvements or expansions to the existing WWTP are required to serve the proposed project. The addition of project-generated wastewater would not result in any RWQCB violations related to effluent treatment or discharge. Implementation of the proposed project would have a **less than significant** impact.

Response b): Less than Significant. Potable water for the proposed project would be supplied from the City's municipal water system. The Project site would receive potable water via a connection to existing water mains located on Grant Line Road and Chrisman Road. The proposed project's water demand was included in the demand calculations for the Citywide Water System Master Plan.

According to the City's Water System Master Plan, the unit water demand factor for industrial land uses in the is 1.5 acre-feet per acre per year. Using this factor and the site acreage (52.32 acres), the proposed project is expected to require an annual potable water demand of 78.49 acre-feet per year (afy).

The City of Tracy obtains water from both surface water and groundwater sources. The amount of water that Tracy uses from each of its water supply sources to make up its total water use varies from year to year based on contractual agreements, annual precipitation, and City policies about how to expand, utilize, and manage its water resources. As described in the 2020 City of Tracy Urban Water Management Plan, Tracy's maximum annual water supply amounts to over 40,168 afy from its various supply sources.

In recent years, demand for potable water in the City of Tracy has been trending downward. The total 2015 water demand in the City was 14,041 afy. The additional water demand (78.48 afy) of the proposed project would not exceed the City's available water supply. The City's water treatment and conveyance infrastructure is adequate to serve existing demand, in addition to the demand created by the proposed project. Therefore, this is a **less than significant** impact.

The City's water treatment and conveyance infrastructure is adequate to serve existing demand, in addition to the demand created by the proposed project. Therefore, this is a **less than significant** impact.

Responses c): Less than Significant. Development of the Project site would place impervious surfaces on much of the 52.32-acre Project site. Development of the Project site would potentially increase local runoff production and would introduce constituents into storm water that are typically associated with urban runoff. These constituents include heavy metals (such as lead, zinc, and copper) and petroleum hydrocarbons. BMPs will be applied to the concentrations of these constituents in any site runoff that is discharged into downstream facilities to acceptable levels.

Permanent onsite storm drainage would be installed to serve the proposed project. The potential environmental impacts of construction of the onsite storm drainage system are addressed throughout this Initial Study, given that all improvements would occur onsite, within the area proposed for disturbance. As described above under the Hydrology and Water Quality Section, new development projects in the City of Tracy are required to meet specific storm water drainage and quality requirements that are consistent with the overall approach to storm water infrastructure presented in the City of Tracy Citywide Storm Drainage Master Plan.

Prior to issuance of building permits, the project applicant is required to submit a detailed storm drainage infrastructure plan to the City of Tracy Community and Economic Development Department for review and approval (Mitigation Measure HYD-2). The project's storm drainage infrastructure plans must demonstrate adequate infrastructure capacity to collect and direct all stormwater generated on the Project site within onsite retention/detention facilities to the City's existing stormwater conveyance system, and demonstrate that the project would not result in on- or off-site flooding impacts.

The project is also required to pay all applicable development impact fees, which would include funding for offsite Citywide storm drainage infrastructure improvements identified in the 2012 City of Tracy Citywide Storm Drainage Master Plan. The collection of fees and determined fair share fee amounts are adopted by the City as COAs for all new development projects prior to project approval. The adequacy of impact fees is reviewed on an annual basis to ensure that the fee is commensurate with the service.

The development of an onsite storm drainage system that is approved by the City engineer (Mitigation Measure HYD-2), the payment of all applicable fees, and the implementation of a SWPPP that includes specific types and sources of stormwater pollutants, determines the location and nature of potential impacts, and specifies appropriate control measures to eliminate any potentially significant impacts on receiving water quality from stormwater runoff (as required under Mitigation Measure HYD-1), ensure that impacts to storm water drainage facilities are **less than significant**.

Responses d), e): Less than Significant. The City of Tracy has an exclusive franchise agreement with Tracy Disposal Service for solid waste collection and disposal and recycling collection. Solid

waste is collected and taken to the 40-acre Tracy Material Recovery Facility (MRF) and Transfer Station on South MacArthur Drive before being sent to the Foothill Sanitary landfill, 48 miles northeast of Tracy, off of Shelton Road east of Linden, California. The MRF is operated by Tracy Material Recovery and Solid Waste Transfer, Inc., and has capacity of approximately 1,000 tons per day, but averages approximately 350 tons per day, of which 85 percent is generated in Tracy. Approximately 175,000 tons of solid waste is generated in Tracy each year, of which approximately 27 percent is residential garbage.

The approximately 800-acre Foothill landfill, owned by San Joaquin County, is the primary disposal facility accepting the City's solid waste. The Foothill landfill receives approximately 810 tons per day. The landfill is permitted to accept up to 1,500 tons per day, and has a permitted capacity of 138 million cubic yards, of which approximately 125 million cubic yards of capacity remains. It is estimated that the Foothill landfill will have the capacity to accept solid waste from the City of Tracy until 2054.

The proposed Project would not generate significant volumes of solid waste, beyond levels normally found in industrial developments. Using CalRecycle's solid generation rate for manufacturing/warehouse land uses (1.42lbs per 100 sq ft per day), the project is expected to produce approximately 10,197 pounds of solid waste per day. Building A is projected to contribute approximately 6,631 pounds per day to the total, and Building B is projected to contribute approximately 3,564 pounds per day to the total. The addition of the solid waste generated by the project would not exceed the capacity of the local landfills.

As described above, there is adequate landfill capacity to serve the proposed project, and the project will comply with all applicable statutes and regulations related to solid waste. This is a **less than significant** impact.

XX. WILDFIRE

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?			X	
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?			X	
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?			X	
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?			X	

EXISTING SETTING

The California Department of Forestry and Fire Protection (Cal Fire) has designated the southern portion of the City along Interstate 580 as a Local Responsibility Area (LRA), which is within the Moderate Fire Hazard Severity Zone (MFHSZ) with a small portion along the southern most City limits within the High Fire Hazard Severity Zone (HFHSZ). This rating does not extend to the Project site; as such, the site is not in or near land classified as a Very High Fire Hazard Severity Zone (VHFHSZ). Additionally, the proposed project is not located within a State Responsibility Area (SRA). Although this CEQA topic only applies to areas within an SRA or VHFHSZ, out of an abundance of caution, these checklist questions are analyzed below.

RESPONSES TO CHECKLIST QUESTIONS

Response a): Less than Significant. The Project site would connect to an existing network of City streets. The nearest fire station, Tracy Fire Station 92, is located approximately 0.91 miles to the southwest of the Project site. The appropriate turning radiiuses have been planned to accommodate fire trucks on-site. The proposed circulation improvements would allow for greater emergency access relative to existing conditions. Moreover, the proposed project would require building construction to meet the fire code requirements, and would have fire hydrants consistent with the standards of the City; such fire hydrants would assist with fire suppression efforts if a fire was to occur on or near the Project site. Therefore, impacts from project implementation would be considered **less than significant** relative to adopted emergency response plans or evacuation plans.

Response b): Less than Significant. The risk of wildfire is related to a variety of parameters, including fuel loading (vegetation), fire weather (winds, temperatures, humidity levels and fuel moisture contents) and topography (degree of slope). Steep slopes contribute to fire hazard by intensifying the effects of wind and making fire suppression difficult. Fuels such as grass are highly flammable because they have a high surface area to mass ratio and require less heat to reach the ignition point. The Project site is located in an area that is predominately industrial, which is not considered at a significant risk of wildfire. There are no steep slopes on or near the Project site. Development of the project would not exacerbate fire risks. Therefore, impacts from project implementation would be considered **less than significant** relative to the spread of wildfire.

Response c): Less than Significant. The project includes development of infrastructure (water, sewer, and storm drainage) to serve the proposed warehouse buildings. The project does not include the construction of fuel breaks, emergency water sources, or power lines. As noted above, the proposed project would require fire hydrants consistent with the standards of the City, and such fire hydrants would assist with fire suppression efforts if a fire was to occur. The proposed infrastructure improvements would allow for decreased fire risk relative to existing conditions. Therefore, impacts from project implementation would be considered **less than significant** relative to infrastructure that may exacerbate fire risk.

Response d): Less than Significant. The proposed project would require the installation of storm drainage infrastructure to ensure that storm waters properly drain from the Project site and does not result in downstream flooding or major drainage changes. The City requires the application of BMPs to effectively reduce pollutants from stormwater leaving the site during both the construction and operational phases of the project. Additionally, projects are required to prepare a Stormwater Pollution Prevention Plan (SWPPP). The final storm drainage infrastructure plan for the project would also be submitted to the City for review and approval.

The Project site includes a drainage basin between the Remediation Area and Chrisman Road. The storm drainage plan was designed and engineered to ensure proper construction of storm drainage infrastructure to control runoff and prevent flooding, erosion, and sedimentation. BMPs will be applied to the proposed development to limit the concentrations of constituents in any site runoff to acceptable levels. Stormwater flows from the Project site would be directed to the proposed stormwater treatment basins, treatment planters, and bioretention areas by a new stormwater conveyance system on the Project site. Additionally, erosion and sediment control measures would be implemented during construction.

Additionally, the Project site is not located within a FEMA-designated flood hazard zone.

Landslides include rockfalls, deep slope failure, and shallow slope failure. Factors such as the geological conditions, drainage, slope, vegetation, and others directly affect the potential for landslides. The elevation of the site is approximately 23 feet above MSL. Upon development of the project, the site would be graded to eliminate any slopes on the Project site. The project would also be required to comply with the provisions of the California Building Standard's Code, which requires development projects to perform geotechnical investigations in accordance with State

law, which include general engineering characteristics of the subsurface conditions within the Project site and potential mitigation strategies to address any geotechnical concerns or potential hazards(such as slope failure). Therefore, the potential for a landslide (including rockfalls, deep slope failure, and shallow slope failure) on the Project site is low.

Overall, impacts from project implementation would be considered **less than significant** relative to risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			X	
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?			X	
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

RESPONSES TO CHECKLIST QUESTIONS

Response a): Less than Significant. As described throughout the analysis above, the proposed project would not result in any significant impacts that would substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal to the environment.

All potentially significant impacts related to plant and animal species would be reduced to a less than significant level through the application of uniformly applied development policies and/or standards. The proposed project is required to implement a range of standard and uniformly applied development policies and standards, most of which are identified in the Tracy General Plan or various infrastructure master plans, which would reduce any potentially significant impacts to a less than significant level. The cumulative impacts associated with development of the project were considered, analyzed and disclosed in the City of Tracy General Plan and General Plan EIR. On February 1, 2011 the Tracy City Council adopted a Statement of Overriding Considerations (Resolution 2011-028) for all significant impacts associated with buildout of the Tracy General Plan. The project would not result in any cumulative impacts that were not contemplated in the General Plan EIR. The project would not result in any peculiar site-specific impacts, impacts to biological resources or impacts to cultural and/or historical resources.

The proposed project would implement requirements aimed at reducing stormwater pollutants and runoff, as well as through compliance of various state, regional and local standards. Specifically related to ensuring the continued sustainability of biological resources through

adaptive management, Mitigation Measure HYD-2 ensures the project proponent seeks coverage under the SJMSCP to mitigate for habitat impacts to covered special status species. Through the application of uniformly applied development policies and/or standards, the project would not result in any cumulative impacts related to biological resources. Therefore, these are **less than significant** impacts.

Response b): Less than Significant. The General Plan EIR assumed full development and buildup of the Project site, consistent with the use and density proposed by the project. The cumulative impacts associated with buildup of the City of Tracy General Plan, including the Project site, were fully addressed in the General Plan EIR. Additionally, as described throughout the analysis above, the proposed project would not result in any significant individual or cumulative impacts that would not be reduced to less than significant levels through the application of uniformly applied development policies and/or standards. Therefore, this is considered a **less than significant** impact.

Response c): Less than Significant. As described throughout the analysis above, the proposed project would not result in any significant impacts that would have environmental effects which will cause substantial adverse effects on humans. The analysis in the relevant sections above provides the application of uniformly applied development policies and/or standards reduce any potentially significant impacts on humans to less than significant levels. A variety of requirements including those related to aesthetics and light and glare, GHG and air quality, cultural resources, hazardous materials, seismic hazards, water pollution and water quality, and noise, ensure any adverse effects on humans are reduced to an acceptable standard. Therefore, this is considered a **less than significant** impact.

REFERENCES

- C Donald Ahrens. 2006. Meteorology Today: An Introduction to Weather, Climate, & the Environment.
- California Air Resources Board. Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles. October 2000. Available at: <https://www.arb.ca.gov/diesel/documents/rrpFinal.pdf>.
- California Department of Conservation. California Important Farmlands Finder. Available at: <https://maps.conservation.ca.gov/DLRP/CIFF/>.
- California Department of Conservation. 2016. San Joaquin County Williamson Act FY 2015/2016.
- California Department of Conservation. Williamson Act/Land Conservation Act. Available at: <http://www.conservation.ca.gov/dlrp/lca>.
- California Department of Fish and Wildlife. CNDD BIOS viewer. Version 6, Available at: <https://wildlife.ca.gov/Data/BIOS>.
- California Energy Commission. 2024. California Greenhouse Gas Emission Inventory – 2021 Edition. Available at: <https://www.arb.ca.gov/cc/inventory/data/data.htm>
- City of Tracy. City of Tracy Wastewater Master Plan (carollo engineers, 2023).
- City of Tracy. City of Tracy 2020 Urban Water Management Plan (eki environment and water, 2021).
- City of Tracy. City of Tracy Airport Master Plan (P&D Aviation, 1998).
- City of Tracy. City of Tracy Citywide Roadway & Transportation Master Plan (Kimley Horn, 2022).
- City of Tracy. City of Tracy Citywide Storm Drainage Master Plan Update (Wood Rodgers, 2022).
- City of Tracy. City of Tracy General Plan and EIR (City of Tracy, 2011).
- City of Tracy. City of Tracy Manual of Stormwater Quality Standards for New Development and Redevelopment (Larry Walker Associates, 2008).
- City of Tracy. City of Tracy Municipal Services Review 2019 (De Novo Planning Group, 2019).
- Department Of Toxic Substances Control EnviroStor Database. 2018. Available at: <http://www.envirostor.dtsc.ca.gov/>.
- Inventory of California Greenhouse Gas Emissions and Sinks: 1990 to 2004. (Staff Final Report), California Energy Commission, 2006.
- Meteorology Today: An Introduction to Weather, Climate, & the Environment, 2003, D.C. Ahrens.

- San Joaquin Council of Governments, Airport Land Use Commission. July 2009, Amended January 2018. Airport Land Use Compatibility Plan Update, San Joaquin County Aviation System, San Joaquin County, California.
- San Joaquin Valley Air Pollution Control District. March 19, 2015. Guide for Assessing and Mitigating Air Quality Impacts (GAMAQI).
- San Joaquin Valley Air Pollution Control District. Small Project Analysis Level (SPAL). November 2020. Available at: <https://www.valleyair.org/transportation/CEQA%20Rules/GAMAQI-SPAL.PDF>.
- U.S. Environmental Protection Agency. Water Sense Guide. Available At <https://www.epa.gov/watersense/program-guidelines>.
- U.S. Department of Agriculture, Natural Resources Conservation Service (NRCS) Web Soil Survey (WSS). Available at: <http://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm>.