



**ADDENDUM TO THE
ELLIS MODIFIED PROJECT
ENVIRONMENTAL IMPACT REPORT
SCH NO. 2012022023**

February 2018

**Proposed Amendment to the
Ellis Specific Plan**

Prepared For:

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INTRODUCTION

The following document provides an analysis of the proposed Amendment to the Ellis Specific Plan and General Plan Amendment (“proposed Project”) with respect to consistency with the previously approved Ellis Specific Plan, the analysis contained in the certified Modified Ellis Project EIR (“EIR” or “Ellis Project”), and any site specific environmental impacts or cumulative impacts that may result from the proposed Amendment to the Specific Plan as described herein.

California Environmental Quality Act

This Addendum has been prepared in accordance with the provisions of the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] §§ 21000 et seq.); the State CEQA Guidelines (Title 14, California Code of Regulations [CCR] §§ 15000 et seq.); and the rules, regulations, and procedures for implementing CEQA as set forth by the City of Tracy (City).

Section 15164(a) of the State CEQA Guidelines states that “the lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.” Pursuant to Section 15162(a) of the State CEQA Guidelines, a subsequent EIR or Negative Declaration is only required when:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or,

- (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The following describes the requirements of an addendum, as defined by CEQA Guidelines Section 15164:

- (a) The lead agency or responsible agency shall prepare an Addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a Subsequent EIR have occurred.
- (b) An Addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.
- (c) An Addendum need not be circulated for public review but can be included in or attached to the Final EIR.
- (d) The decision-making body shall consider the Addendum with the Final EIR prior to making a decision on the project.
- (e) A brief explanation of the decision not to prepare a Subsequent EIR pursuant to Section 15162 should be included in an Addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

If none of these circumstances are present, and only minor technical changes or additions are necessary to update the previously certified EIR, an addendum may be prepared, consistent with CEQA Guidelines Section 15164.

Based on the analysis and evaluation provided in this Addendum, no new significant impacts would occur because of the proposed Amendment, nor would there be any substantial increase in the severity of any previously-identified significant environmental impact. In addition, no new information of substantial importance shows that mitigation measures or alternatives that were previously found not to be feasible or that are considerably different from those analyzed in the Modified Ellis Project Environmental Impact Report would substantially reduce one or more significant effects on the environment. Therefore, no conditions described in Section 15162 of the CEQA Guidelines has occurred. For this reason, an Addendum is the appropriate document that will comply with CEQA requirements for the proposed Amendment.

PREVIOUS ENVIRONMENTAL ANALYSIS OF THE PROJECT

The Tracy City Council approved the Ellis Specific Plan and certified the corresponding EIR (Modified Ellis Project EIR (SCH# 2012022023)) on January 22, 2013. This EIR incorporates by reference, where relevant and appropriate, discussion and analysis contained in the previously prepared Ellis Specific Plan EIR. The Modified Ellis Project EIR evaluates the potential environmental impacts resulting from the approval and implementation of the Ellis Specific Plan Project. The Ellis Specific Plan Project involves the development of a minimum of 1,000 to a maximum of 2,250 residential units, as well as a Village Center, open space, 180,000 square feet of retail, office, and other commercial uses, and, consistent with the City's

requirements, approximately four acres per 1,000 people of parks with an opportunity to include a Swim Center on approximately 321 acres. As noted above, the Specific Plan also included a zoning action, and therefore constitutes the zoning for the Ellis Specific Plan Area, which includes the proposed Project site.

PURPOSE OF ADDENDUM

The purpose of this Addendum is to analyze any potential differences between the impacts identified in the previously certified Modified Ellis Project EIR and those that would be associated with the proposed modifications to the Ellis Specific Plan Project.

Pursuant to provisions of CEQA and the State CEQA Guidelines, the City of Tracy is the Lead Agency charged with the responsibility of deciding whether to approve the proposed Amendment. As part of its decision-making process, the City is required to review and consider whether the proposed Amendment would create new significant impacts or significant impacts that would be substantially more severe than those disclosed in the previously certified EIR. The decision-making body must consider the whole of the data presented in the Modified Ellis Project EIR, and as augmented by this Addendum and the previously adopted Mitigation Monitoring and Reporting Program. Additional CEQA review beyond this Addendum would only be triggered if the proposed Amendment created new significant environmental effects or a substantial increase in the severity of previously identified significant effects disclosed in the Modified Ellis Project EIR used to approve the Ellis Specific Plan.

PROPOSED REVISIONS TO THE APPROVED PROJECT

An Amendment to the previously approved Ellis Specific Plan and General Plan Amendment (proposed Project) has been submitted to the City of Tracy for consideration. The purpose/intent of the Amendment is for modification to the proposed swim center location within the Ellis Specific Plan and other proposed refinements to the Village Center and Limited Use acreages. There are also other proposed changes to the Specific Plan, such as the addition of the Residential Estate designation. The overall existing footprint of the Ellis Specific Plan has not changed, nor the overall number of proposed dwelling units or commercial square footage. Rather, the Project proposes to shift land uses slightly for better use of the Ellis Specific Plan site.

Project Location

The City of Tracy is located in San Joaquin County, which is within the Central Valley region of California. The City is approximately 60 miles east of San Francisco, which is separated from the Central Valley by the Coastal Range. The southwestern portion of San Joaquin County is located within the Diablo Range, and generally consists of rolling hills cut by drainage channels; refer to Figure 1, *Regional Vicinity Map*.

The Ellis Specific Plan area is physically separated from surrounding areas by the Union Pacific Railroad on the south, the Delta Mendota Canal to the southwest, Corral Hollow Road on the east, and Lammers Road on the west; refer to Figure 2, *Project Vicinity Map*.

Change in Site Condition

A portion of Phase I of the Ellis Specific Plan area has already been developed with approximately 40 single-family residential units under the existing Project approvals. Another 62 single-family residential units are currently under construction.

Proposed Modifications to the Ellis Specific Plan Amendment (Proposed Modifications)

As set forth in the City's General Plan, the General Plan designations for the Ellis Specific Plan area includes Traditional Residential-Ellis (TR-Ellis), Commercial, and Village Center. The proposed Amendment (modifications) to the Ellis Specific Plan would decrease the Residential Mixed designation from 284.7 acres to 260 acres, increase the Village Center designation from 5.7 to 14 acres, eliminate the Commercial designation, increase the Limited Use designation from 26.2 acres to 30 acres, and add 17 acres in a new designation known as "Residential Estates." The proposed Amendment would merge the 5.7 acres of Village Center (60,000 square feet of non-residential uses and up to 50 high density residential units) with the existing 4.4 acres of Commercial use (40,000 square feet of non-residential uses) and add 4 acres to create a total of approximately 14 acres of Village Center. The proposed Swim Center location would also shift south of its existing proposed location for better site access; refer to Figure 3, *Revised General Plan Land Use Designations*, and Figure 4, *Revised Ellis Specific Plan Zoning Summary*.

Table 1, *Existing vs Proposed Ellis Specific Plan Land Use Summary*, identifies the proposed land use changes.

Table 1: Existing vs Proposed Ellis Specific Plan Land Use Summary

Land Use Designation	2012 Ellis Specific Plan	2017 Ellis Specific Plan Amendment	Change
Residential Mixed	1,000 to 2,250 Units	1,000 to 2,250 units	No Change
Residential Estates	N/A	0 to 9 units	+9 units
Village Center	0 to 50 units	0 to 50 units	No Change
Total Residential Units Allowed	2,250 maximum	2,250 maximum	No Change
Village Center	60,000 sf	140,000 sf	+80,000 sf
Commercial	40,000 sf	0 sf	-40,000 sf
Limited Use (subset of Commercial Uses)	80,000 sf	40,000 sf	-40,000 sf
Total Non-Residential Square Feet Allowed	180,000 sf	180,000 sf	No Change

Source: *Ellis Specific Plan Amendment, March 2017*

As identified in Table 1, no changes would occur to the overall allowable residential units or overall square footage previously approved as part of the Ellis Specific Plan.

The Specific Plan Amendment would also require a General Plan Amendment to provide consistency between the General Plan Land Use Designations Map with the changes proposed in the Specific Plan Amendment.

All future development within the Ellis Specific Plan footprint (including in newly designated areas as identified in the Specific Plan Amendment) would be required to go through City processes and approvals prior to construction, as specified in the Ellis Specific Plan.

Development Agreement Amendment

The proposed Project also includes a second amendment to the existing Amended and Restated Development Agreement (DA) for the Ellis Specific Plan. The key changes to the existing Development Agreement are as follows:

- City and Owner (identified in the DA as Surland Communities, LLC) to execute an agreement to provide for, among other things, the design, funding and construction of the Swim Center and certain associated infrastructure improvements;
- States that Owner may in the future apply to the City for subsequent DA Amendments to bring additional property outside of the existing Ellis Specific Plan area within the coverage, terms and conditions of the Development Agreement. This additional property is defined in the proposed DA Amendment as “DA Property” (in contrast with the property within the existing Ellis Specific Plan Area, which is defined in the DA as “Property”). Before this additional property (the “DA Property”) can become subject to the coverage of the DA, it must be annexed to the City through normal annexation and planning procedures, which include all necessary San Joaquin County Local Agency Formation Commission approvals, all necessary City Council approvals, and compliance with all applicable California Environmental Quality Act requirements. The City Council will retain its full discretion to approve, conditionally approve, or deny any application by Owner to bring such additional DA Property within the coverage of the DA;
- Modifies the City’s Growth Management Ordinance Guidelines to expand the scope of Owner’s eligibility for Residential Growth Allotments (RGAs) and to allow Owner to transfer RGAs issued to Owner under the DA to additional properties which, in the future, come within the coverage of the DA through future DA Amendments;
- Owner to be granted a right-of-first-refusal for Residential Growth Allotments (RGAs) not accepted by other property owners, up to the City’s entire maximum RGA allocation for that year;
- The effective term of Building Permits issued to the Project Applicant shall be extended to 24 months;
- Owner may execute an agreement with the City to provide for payment of development impact fees at close of escrow for each residential unit, rather than at issuance of building permit or certificate of occupancy;
- Modifications to park approval process for parks within the Project site;
- City and Owner to execute a Park & Landscape Maintenance Agreement;
- City and Owner to cooperate to annex all property covered by the Development Agreement (as it now exists or may exist in the future) to the Ellis Community Facilities District;
- City and Owner to execute a Public Infrastructure Credit & Reimbursement Agreement.

Development Agreement Properties or additional property (“DA Property”) not currently within the boundaries of the Ellis Specific Plan are not evaluated in this Addendum, as they are unknown at this time, and any analysis related to their respective impacts would be too speculative for evaluation. Further, as summarized in bullet point #2 above, the DA is intended to preclude the extension of any rights to additional property, specifically, any lands outside of the boundaries of the Ellis Specific Plan until such

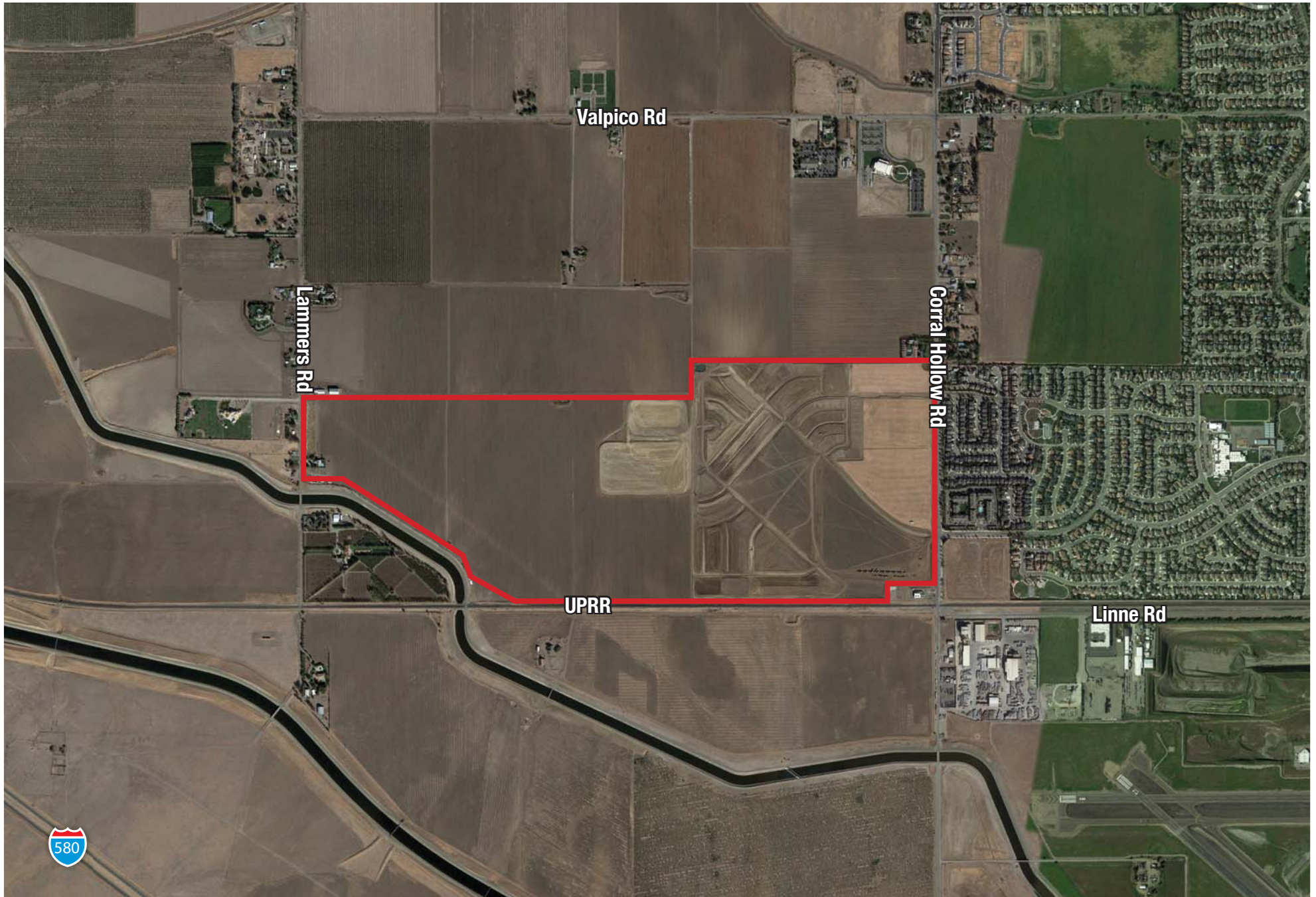
time as the owner processes any other DA Property through all of the City's conventional planning processes, including securing applicable general plan amendments/zone changes, annexation, sphere of influence boundary modifications and complies with all requirements under CEQA for discretionary actions related to the inclusion of DA Properties within the boundaries of Ellis.

Among other factors, additional CEQA review beyond this Addendum would be triggered if the proposed second amendment to the DA created new significant environmental effects (not previously analyzed in the certified EIR) or would result in a substantial increase in the severity of previously identified significant effects disclosed in the EIR used to approve the Ellis Specific Plan. The key changes identified above are intended to further govern the implementation of the above project and do not constitute substantial changes to the project or project circumstances that would require major revisions to the certified EIR. The key changes identified above are minor technical changes that neither result in new environmental impacts, nor increase the severity of the environmental impacts previously analyzed.

Zoning Ordinance Amendment

The proposed Project also includes an amendment to the Zoning Ordinance. The purpose of the Zoning Ordinance Amendment is to add the Ellis Specific Plan Zone to the list of zone districts in the City. Upon implementation of the Zoning Ordinance Amendment, all property within the Ellis Specific Plan Area will be zoned Ellis Specific Plan Zone and the City's Zoning Map would be amended to reflect this change. The zoning regulations for the Ellis Specific Plan Zone are contained in the existing Ellis Specific Plan.


Based on the analysis and evaluation provided in this Addendum, no new significant impacts would occur because of the proposed Zoning Ordinance Amendment, nor would there be any substantial increase in the severity of any previously-identified significant environmental impact.



Source: Google Earth, 2017

 Project Site

FIGURE 2: Project Vicinity Map
Addendum to the Ellis Modified Project EIR
City of Tracy

 Not to scale

Kimley»Horn

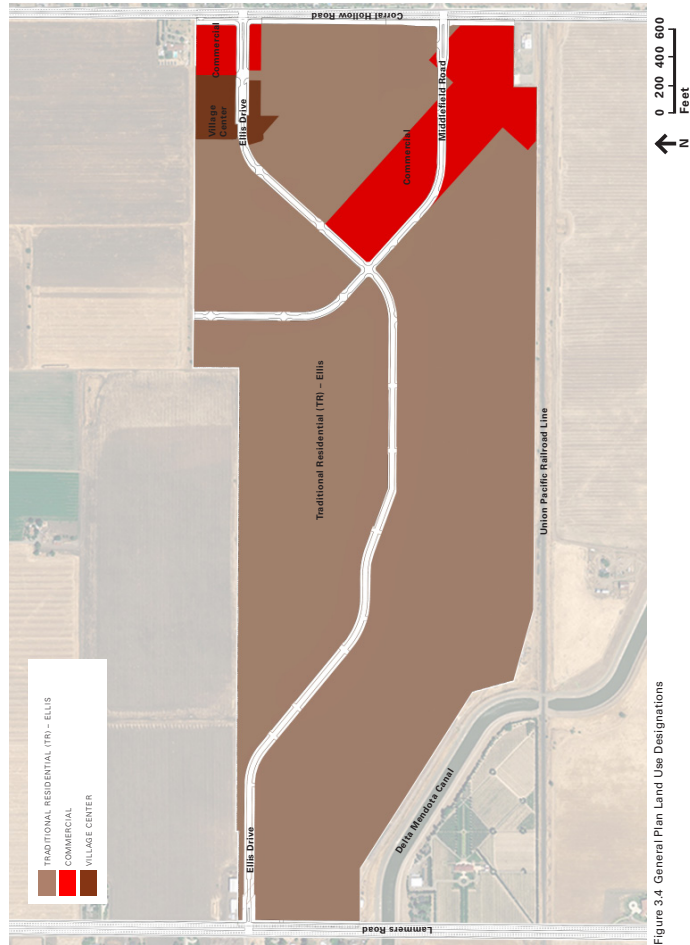


Figure 3.4 General Plan Land Use Designations

Section 3
LAND USE 3

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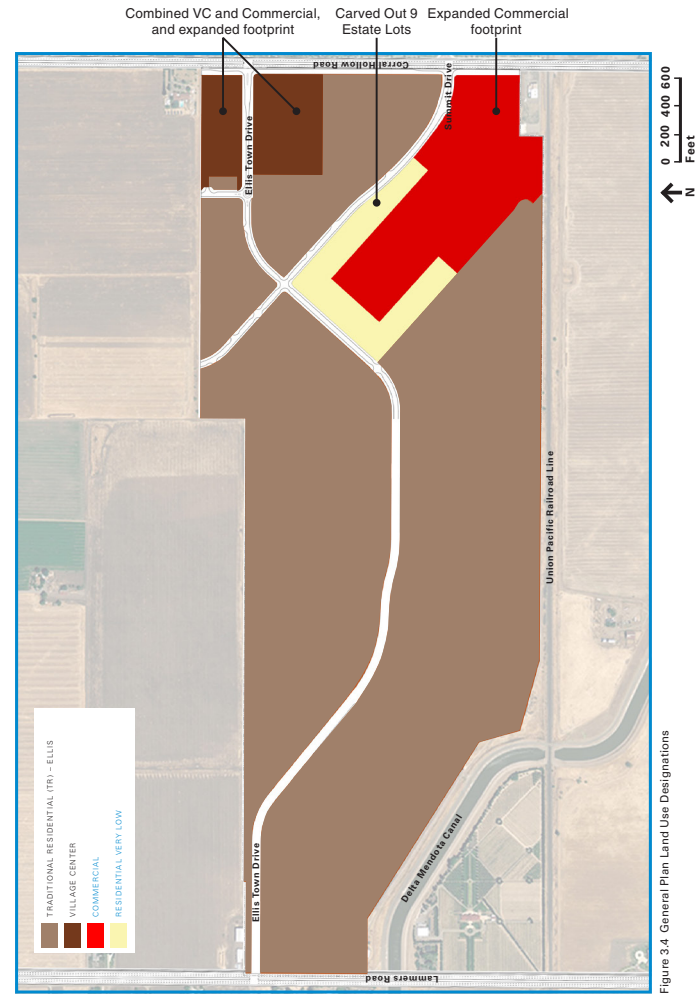
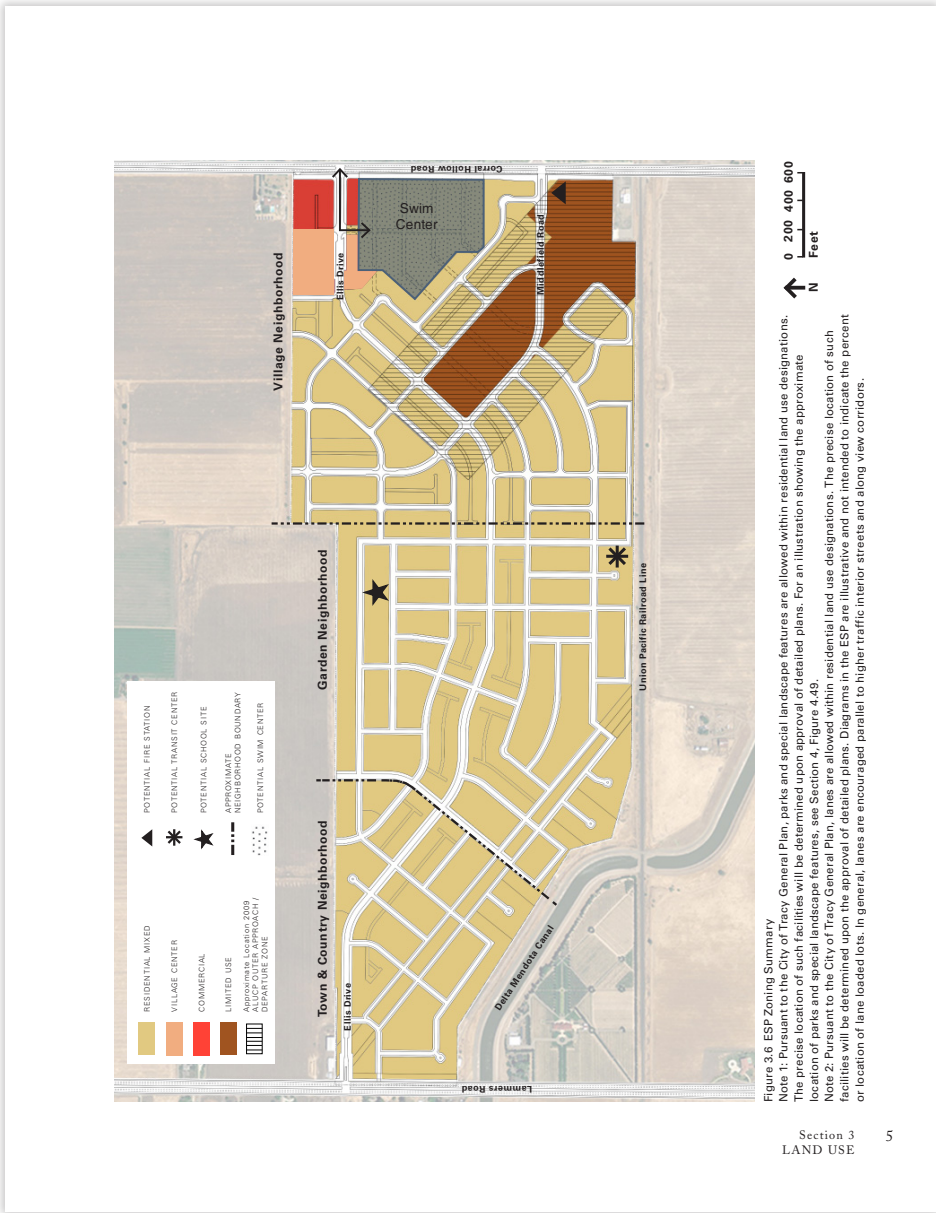


Figure 3.4 General Plan Land Use Designations

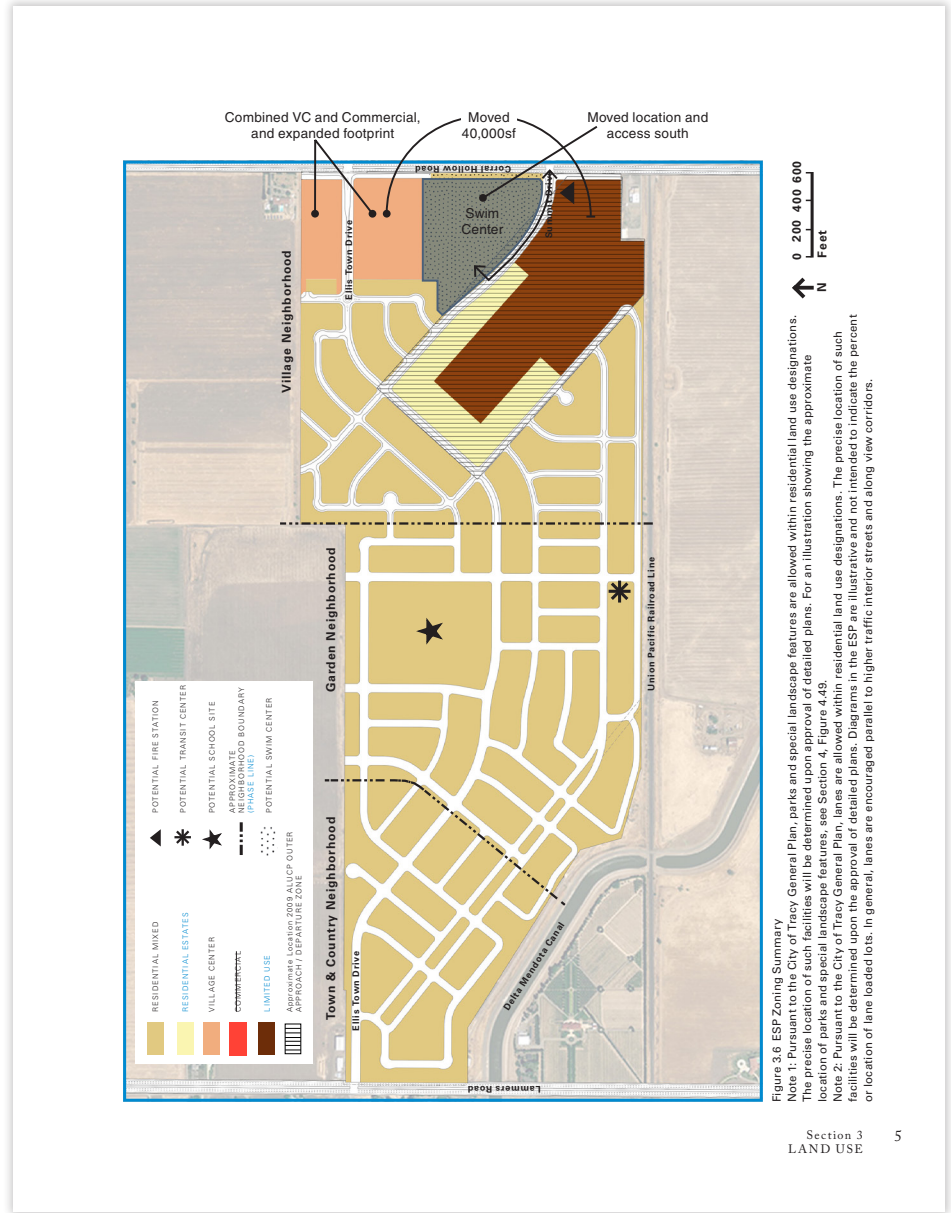
Section 3
LAND USE 3

PROPOSED

FIGURE 3: Revised General Plan Land Use Designations
Addendum to the Ellis Modified Project EIR
City of Tracy

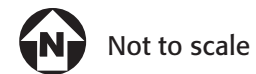


APPROVED



PROPOSED

FIGURE 4: Revised Ellis Specific Plan Zoning Summary
 Addendum to the Ellis Modified Project EIR
 City of Tracy



Ellis Specific Plan Environmental Impact Analysis Summary

The Modified Ellis Project EIR, certified on January 22, 2013, found the following effects to be significant and unavoidable impacts:

Aesthetics, Light, and Glare:

- The Ellis Specific Plan would create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.
- Implementation of the Ellis Specific Plan could substantially degrade the existing visual character or quality of the site and its surroundings.
- The Ellis Specific Plan could cause a substantial adverse effect on a scenic vista.
- The Ellis Specific Plan could substantially damage scenic resources, including, but not limited to, trees, rocks, outcroppings, and historic buildings within a state scenic highway.

Air Quality:

- The Ellis Specific Plan would result in an overall increase in the local and regional pollutant load due to direct impacts from vehicle emissions and indirect impacts from area sources and electricity consumption.
- Due to the Ellis Specific Plan site's exceedances of SJVAPCD's air quality standards, future development within the ESP site would not be consistent with the most recent Air Quality Management Plan.
- Implementation of the Ellis Specific Plan could impact regional air quality levels on a cumulatively considerable basis.

Agricultural Resources:

- The proposed Ellis Specific Plan would convert Prime Farmland to non-agricultural uses.

Greenhouse Gas Emissions:

- Significant generation of greenhouse gas emissions.
- Future development facilitated by the Ellis Specific Plan and other related cumulative projects could have a cumulatively considerable contribution to greenhouse gas emissions.

Land Use:

- Agricultural land conversion.

Noise:

- Substantial noise levels for future residential uses along the Union Pacific Railroad.
- Temporary increases in noise and/or vibration from grading and construction.
- Substantial increases in traffic noise.
- Cumulatively considerable contribution to traffic noise.

Traffic:

- The addition of traffic to the regional transportation system from the Ellis Specific Plan would degrade LOS on I-580 west of I-205 to unacceptable traffic conditions during the AM and PM peak hours.
- The addition of traffic from the Ellis Specific Plan would further degrade an existing unacceptable traffic condition on Tesla Road and Patterson Pass Road individually and cumulatively.
- Cumulative contribution of traffic to segments of I-580.

The 2013 Modified Ellis Specific Plan Final EIR found the following effects to be less than significant with mitigation incorporated:

Air Quality:

- Construction related dust and vehicle emissions;

Agriculture:

- Impacts to Important Farmland;

Biological Resources:

- Impacts to candidate, sensitive, or special status species or sensitive natural community identified in local or regional plans, policies, or regulations;
- Impacts to riparian habitat or other sensitive natural communities;
- Cumulatively considerable contribution to the loss of vegetation and wildlife resources;

Geology and Soils Hazards:

- Located on expansive soils;

Greenhouse Gas Emissions:

- Conflict with an applicable greenhouse gas reduction plan, policy, or regulation;

Hazards and Hazardous Materials:

- Accidental release of hazardous materials;

Hazards associated with natural gas and oil pipelines;

- Cumulatively considerable contribution to hazardous impacts;

Hydrology, Drainage, and Water Quality:

- Violate water quality standards;
- Alter drainage patterns;
- Degrade water quality;

Public Utilities:

- Increase demand necessitating the expansion of utility services;
- Substantial adverse impacts associated with provisions of new or physically altered government facilities, or the need for new facilities.

Traffic:

- Generation of unacceptable levels of service;

Water Supply and other Public Utilities:

- Expansion of City's existing wastewater treatment system;
- Cumulative demand for water, wastewater, and storm drainage facilities;

Implementation of mitigation measures identified in the Modified Ellis Project EIR would reduce the severity of potentially significant and unavoidable impacts as well as mitigate aforementioned impacts to a level of less than significant. Where applicable, mitigation measures stemming from the previously certified Specific Plan EIR and adopted as conditions of Specific Plan approval would be incorporated into the proposed Project.

The Ellis Specific Plan Final EIR found that build-out of the Ellis Specific Plan would have a less than significant impact or no impact to remaining topical areas not identified above pursuant to the *CEQA Guidelines*.

Conclusion

The proposed Amendment would not result in any new significant impacts that have not already been analyzed in the Modified Ellis Project EIR. The implementation of the Amendment would also not result an increase in the severity of any previously identified environmental impacts. The potential impacts associated with this Amendment would either be of the same significance or less than those described in the Modified Ellis Project EIR. There are no substantial changes to the conditions under which the proposed Amendment would be undertaken that would result in any new or more severe environmental impacts than those already addressed in the certified Modified Ellis Project EIR. No new information regarding the potential for new or more severe significant environmental impacts been identified. Therefore, in accordance with the State CEQA Guidelines, this Addendum to the previously certified Modified Ellis Project EIR is the appropriate environmental documentation for the Ellis Specific Plan Amendment. No further environmental review associated with the proposed Amendment is thereby required.

On January 22, 2013, the Tracy City Council adopted a Statement of Overriding Considerations for all significant impacts associated with build-out of the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact not contemplated in the previously certified Modified Ellis Project EIR.

I. AESTHETICS

Threshold (a) Would the Project have a substantial adverse effect on the scenic vista?

Previous Significance Determination: Impacts related to scenic vistas were considered significant and unavoidable in the previously certified Modified Ellis Project EIR.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

Implementation of the proposed Amendment would not impact the scenic vista, as the changes are limited to a shift in land use designations and acreages. A portion of the Ellis Specific Plan Area has already been developed with residential uses. Implementation of the proposed Amendment would lead to future development of the site consistent with the Specific Plan Amendment. As such, the scenic vista would not be altered any further than what was previously analyzed. No greater impacts and no change to the disposition of impacts on the build-out of the Ellis Specific Plan would occur as a result of the proposed Amendment. Additional environmental review is not required since this impact was addressed and is consistent with the development density analyzed in the Modified Ellis Project EIR.

Threshold (b) Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

Previous Significance Determination: The Ellis Specific Plan would result in the construction of buildings and other urban features within the range of the I-580, which is a designated scenic corridor. Thus, a significant and unavoidable impact would occur.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

Implementation of the proposed Amendment would not damage scenic resources, as the modifications to the Specific Plan are limited to a shift in land use designations and acreages. Implementation of the proposed Amendment would lead to future development of the site consistent with the Specific Plan Amendment. As such, impacts to scenic resources would not be altered any further than what was previously analyzed. Additional environmental review is not required since this impact was addressed and is consistent with the development density analyzed in the Modified Ellis Project EIR.

Threshold (c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Previous Significance Determination: Impacts related to the visual character of the Ellis Specific Plan site were considered significant and unavoidable in the previously certified Modified Ellis Project EIR.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

Implementation of the proposed Amendment would likely lead to future development of the site consistent with the Specific Plan and as modified by the proposed Amendment. No greater impacts and

no change to the disposition of impacts on the build-out of the Ellis Specific Plan would occur as a result of the proposed Amendment. Additional environmental review is not required since this impact was addressed and is consistent with the development density analyzed in the Modified Ellis Project EIR.

Threshold (d) Would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Previous Significance Determination: Light and glare generated by the Ellis Specific Plan were considered significant and unavoidable in the previously certified Modified Ellis Project EIR.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

The proposed modifications to the Specific Plan would have no material effect on the previously analyzed light and glare impacts, as the modifications to the Specific Plan are limited to a shift in land use designations and acreages. The proposed modifications to the Specific Plan would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed.

Cumulative Impacts

The potential aesthetic impacts related to views, aesthetics, and light and glare are site specific. While impacts are minimized with implementation of mitigation measures, impacts related to aesthetics across the Specific Plan Area were considered cumulatively significant and unavoidable in the previously certified Modified Ellis Project EIR. As discussed above, the proposed Amendment to the Specific Plan would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. Amendment-related impacts are consistent with the environmental effects previously identified certified Modified Ellis Project EIR. The proposed Amendment would be consistent with the land use and development regulations contained in the Ellis Specific Plan. Therefore, no additional adverse cumulative aesthetic impacts would occur. This finding is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed.

Mitigation Program

The proposed Amendment to the Specific Plan would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. The mitigation measures provided in the Modified Ellis Project EIR continue to be applicable and no additional mitigation measures are required.

II. AGRICULTURAL AND FORESTRY RESOURCES

Threshold (a) Would the project 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?

Threshold (b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

Previous Significance Determination: Impacts related to the conversion of prime farmland were considered significant and unavoidable in the previously certified Modified Ellis Project EIR.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

The California Department of Conservation Farmland Mapping and Monitoring Program has designated the site "Farmland of Local Importance". No Prime Farmland, Unique Farmland, or Farmland of Statewide Importance is currently mapped in the Ellis Specific Plan vicinity. It should be noted however, that at the time of the preparation of the Modified Ellis Project EIR, a portion of the site was mapped as Prime Farmland. The proposed Ellis Specific Plan site is not the subject of a Williamson Act contract. The site is currently zoned Ellis Specific Plan.

The proposed Amendment is consistent with the City's overall planning vision, which assumes residential and commercial uses would be developed with urban uses. The proposed Amendment does not contribute to this impact since the proposed Amendment area does not currently contain prime farmland, unique farmland, or farmland of statewide importance.

Thus, the proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed.

Threshold (c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

Threshold (d) Result in the loss of forest land or conversion of forest land to non-forest use?

Threshold (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 Previous

Previous Significance Determination: No impacts related to the conversion of forest land were in the previously certified Modified Ellis Project EIR.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

No forest land occurs within or adjacent to the Ellis Specific Plan area. The Ellis Specific Plan, the 2011 City of Tracy General Plan and the 2013 Tracy Zoning Ordinance do not provide for any forest land preservation within the site. No change to the disposition of impacts associated with the build-out of the Ellis Specific Plan would result from the proposed Amendment. Impacts were considered less than significant for build-out of the Ellis Specific Plan, therefore impacts would remain less than significant. This finding is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed.

Cumulative Impacts

As discussed above, the proposed Amendment to the Specific Plan would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. Amendment-related impacts are consistent with the environmental effects previously identified in the certified Modified Ellis Project EIR. The proposed Amendment would be consistent with the land use and development regulations contained in the Ellis Specific Plan. Therefore, no additional adverse cumulative agricultural and forestry related impacts would occur. This finding is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. Less than significant impacts would occur.

Mitigation Program

The proposed Amendment to the Specific Plan would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. The mitigation measures provided in the Modified Ellis Project EIR continue to be applicable and no additional mitigation measures are required.

III. AIR QUALITY

Threshold (a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Previous Significance Determination: The Modified Ellis Project EIR found that build-out of the Specific Plan would generate a substantial increase in (both construction and operational-related) criteria air pollutants that would exceed the SJVACPD's significance thresholds. Therefore, build out of the Specific Plan Area would be inconsistent with the SJVACPD's air quality plans and impacts were considered significant and unavoidable within the previously certified EIR prepared for the Ellis Specific Plan.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

The density and intensity of land uses proposed under the Amendment are consistent with the Ellis Specific Plan; thus, impacts relative to conflicts with applicable air quality plans would be similar to the building density, intensity, and land use designations identified in the Modified Ellis Project EIR and no new impact or increase in the severity of a previously identified impact would occur.

Threshold (b) Would the project violate an air quality standard or contribute to an existing or projected air quality violation?

Threshold (c) Would the project result in cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emission which exceed quantitative thresholds for ozone precursors)?

Threshold (d) Would the project expose sensitive receptors to substantial pollutant concentrations?

Previous Significance Determination: The region of the proposed Amendment area is classified as nonattainment for ozone, PM₁₀, and particulate matter with a diameter smaller than 2.5 microns (PM_{2.5}). Buildout of the Specific Plan Area would generate emissions of ROG, PM₁₀, and NO_x during operation that would be above the SJVACPD's regional thresholds of significance. Therefore, impacts were determined to be significant and unavoidable within the previously certified EIR prepared for the Ellis Specific Plan.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

The density and intensity of land uses proposed under the Amendment are consistent with the Ellis Specific Plan; thus, the impact relative to air quality violations would be similar to the building density, intensity, and land use designations identified in the Modified Ellis Project EIR and no new impact or increase in the severity of a previously identified impact would occur.

Threshold (e) Would the project create objectionable odors affecting a substantial number of people?

Previous Significance Determination: The Ellis Specific Plan does not propose to include any odor inducing uses on the site. Therefore, impacts were determined to be less than significant within the previously certified EIR prepared for the Ellis Specific Plan.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

SJVAPCD has identified a list of common types of facilities that have been known to produce odors in the SJVAB along with a reasonable distance from the source within which, the degree of odors could be significant. These land uses include the following: wastewater treatment facilities, sanitary landfills, transfer stations, composting facilities, petroleum refinery, asphalt batch plant, chemical manufacturing, fiberglass manufacturing, painting/coating operations, food processing facilities, feed lot/dairies and rendering plants. The proposed Amendment does not propose to include any odor inducing uses on the site. Therefore, the Amendment would not allow for development of uses that would be a source of objectionable odors, therefore no impact would occur. This finding is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed.

Cumulative Impacts

Impacts related to air quality associated with the development of the Ellis Specific Plan were considered cumulatively significant and unavoidable in the previously certified Modified Ellis Project EIR. As discussed above, the proposed Amendment to the Specific Plan would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. Amendment-related impacts are consistent with the environmental effects previously identified certified Modified Ellis Project EIR. The proposed Amendment would be consistent with the land use and development regulations contained in the Ellis Specific Plan. Therefore, no additional adverse cumulative air quality related impacts would occur. This finding is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. Less than significant impacts would occur.

Mitigation Program

The proposed Amendment to the Specific Plan would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. The mitigation measures provided in the Modified Ellis Project EIR continue to be applicable and no additional measures are required.

IV. BIOLOGICAL RESOURCES

Threshold (a) Would the project 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 Wildlife or U.S. Fish and Wildlife Service?

Previous Significance Determination: The Modified Ellis Project EIR concluded that, with mitigation, implementation of the Specific Plan would not impact candidate, sensitive, or special status species.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

Future development that may occur under the proposed Amendment would be located within the same footprint of the Ellis Specific Plan. Thus, impacts associated with sensitive, candidate, or special status species were previously analyzed in the Modified Ellis Project EIR. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed in the certified Modified Ellis Project EIR.

Threshold (b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Threshold (c) Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption?

Previous Significance Determination: As identified in the previously certified EIR prepared for the Ellis Specific Plan, the site does not contain riparian habitat, and no impacts would occur. The Modified Ellis Project EIR concluded that no impacts would occur with respect to either riparian habitat or wetlands.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

As previously discussed, the Ellis Specific Plan area does not contain riparian habitat or wetlands. Implementation of the proposed Amendment would not impact riparian habitat or resources. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed in the certified Modified Ellis Project EIR.

Threshold (d) Would the project 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?

Previous Significance Determination: The Modified Ellis Project EIR concluded that, with mitigation, implementation of the Specific Plan would not impact movement of fish or wildlife species.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

Future development that may occur under the proposed Amendment would be located within the same footprint of the Ellis Specific Plan. Impacts associated with interference of fish or wildlife movement were previously analyzed in the Modified Ellis Project EIR. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed in the certified Modified Ellis Project EIR.

Threshold (e) Would the project conflict with any local policies or ordinances related to protecting biological resources, such as a tree preservation policy or ordinance?

Previous Significance Determination: The Modified Ellis Project EIR concluded that, with mitigation, implementation of the Specific Plan would not conflict with local policies or ordinances protecting biological resources.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

The proposed Amendment is being prepared to update the Ellis Specific Plan, which was adopted in 2013 and is in compliance with the City of Tracy General Plan. All impacts regarding conflicts with relevant plans and ordinances were considered at the time the previously certified Modified Ellis Project EIR was adopted. Consistent with the conclusion identified in the previously certified EIR, the proposed Amendment's impacts in this regard would be less than significant.

Threshold (f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Previous Significance Determination: The Modified Ellis Project EIR concluded that implementation of the Specific Plan would not conflict with an adopted habitat conservation plan.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

As with implementation of the adopted Specific Plan, future development that may occur under the proposed Amendment would be subject to the regulations and provisions of the San Joaquin Multi Species Conservation Plan (SJMSCP). As a result, no impacts relative to conservation plans would occur. This finding is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed.

Cumulative Impacts

As discussed above, the proposed Amendment to the Specific Plan would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. Amendment-related impacts are consistent with the environmental effects previously identified in the certified Modified Ellis Project EIR.

The proposed Amendment would be consistent with the land use and development regulations contained in the Ellis Specific Plan. Additionally, future development that may occur under the proposed Amendment would be located within the same footprint previously analyzed in the Modified Ellis Project EIR. Therefore, no additional adverse cumulative biological resources impacts would occur. This finding is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. Less than significant impacts would occur.

Mitigation Program

The proposed Amendment to the Specific Plan would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. The mitigation measures provided in the Modified Ellis Project EIR continue to be applicable and no additional measures are required.

V. CULTURAL RESOURCES

Threshold (a) Would the project cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5?

Previous Significance Determination: The Modified Ellis Project EIR concluded that implementation of the Specific Plan would not impact historic resources.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

The Ellis Specific Plan area does not contain any sites that are listed on National Register or California Register, are State Landmarks, or are California Points of Interest. Since there are no known historical resources within the Specific Plan Area, the proposed Amendment would not have an impact in this regard. This finding is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed.

Threshold (b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?

Threshold (c) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?

Previous Significance Determination: The Modified Ellis Project EIR concluded that implementation of the Specific Plan would not impact archaeological or paleontological resources.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

The City of Tracy likely contains undiscovered archaeological and paleontological resources, especially in undeveloped areas. Future development that may occur under the proposed Amendment would be developed on vacant land, all of which was analyzed in the previously certified EIR. Thus, although there is the potential to disturb previously undiscovered archaeological and paleontological resources, this potential was previously disclosed and mitigated for in the previously certified EIR. As such, construction within land use designations identified by proposed Amendment would be required to comply with federal and state regulations and the existing Tracy General Plan policies, which would reduce any potential impacts to archaeological resources, if any archaeological resources were discovered during the implementation. Specifically, Tracy General Plan Goal CC-3, Objective CC-3.1, Policies P4 and P5 on pages 3-19 and 3-20 require immediate cessation of construction activity upon discovery of archaeological resources and the protection of cultural resources. Therefore, less than significant impacts would occur. This determination of less than significant impact is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. As such, no further analysis is required.

Threshold (d) Would the project disturb any human remains, including those interred outside of formal cemeteries?

Previous Significance Determination: The Modified Ellis Project EIR concluded that implementation of the Specific Plan would not impact human remains.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

There are no known human remains buried within the Ellis Specific Plan site. However, buried remains could be present and unearthed as a result of excavation and grading associated with future development facilitated by the proposed Amendment. State law and the Tracy General Plan provide guidance should human remains be discovered during construction. The California Health and Safety Code and Tracy General Plan Goal CC-3, Objective CC-3.1, Policy P4, P5, and P6 on pages 3-19 and 3-20 require that if human remains are inadvertently discovered during excavation or construction activities, all construction affecting the discovery site must halt, the contractor must contact the appropriate professionals, and the county coroner must examine the remains within 48 hours of discovery. Additionally, if the remains are determined to be Native American, the City would work with local Native American representatives to ensure that the remains and any associated artifacts are treated in a respectful and dignified manner. Despite the applicable regulatory framework and the relatively low likelihood of discovery, it remains possible that future development could discover human remains during subsurface activities, which could then result in the remains being inadvertently damaged. Therefore, less than significant impacts would occur. This determination of less than significant impact is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. As such, no further analysis is required.

Cumulative Impacts

As discussed above, the proposed Amendment to the Specific Plan would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. Amendment-related impacts are consistent with the environmental effects previously identified in the certified Modified Ellis Project EIR. The proposed Amendment would be consistent with the land use and development regulations contained in the Ellis Specific Plan. Additionally, future development that may occur under the proposed Amendment would be located within the same footprint previously analyzed in the Modified Ellis Project EIR. Therefore, no additional adverse cumulative cultural resources impacts would occur. This finding is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. Less than significant impacts would occur.

VI. GEOLOGY AND SOILS

Thresholds (a.i – a.iv) Would the project expose persons or structures to seismic hazards?

Previous Significance Determination: The Modified Ellis Project EIR concluded that implementation of the Specific Plan would not expose persons or structures to seismic hazards.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

The Ellis Specific Plan area is not considered susceptible to the risk of loss, injury, or death due to fault rupture and the associated impacts would be less than significant. This determination of less than significant impact is supported by the previously certified EIR prepared for the Ellis Specific Plan.

The Seismic Hazards Zonation Program of the California Geological Survey (CGS) has not identified any seismically-induced liquefaction zones in the City of Tracy or in the Ellis Specific Plan Area and impacts would be considered less than significant. This determination of less than significant impact is supported by the previously certified EIR prepared for the Ellis Specific Plan.

The risk of loss, injury, or death due to landslides is considered very low on the Ellis Specific Plan site and the impacts would be considered less than significant. This determination of less than significant impact is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. As such, no further analysis is required.

Threshold (b) Would the project result in substantial erosion or loss of topsoil?

Previous Significance Determination: The Modified Ellis Project EIR concluded that implementation of the Specific Plan would not result in erosion or loss of topsoil.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

No land uses or densities are proposed as part of the Amendment that have the potential to increase the severity or likelihood of erosion, and thus impacts are less than significant. This determination of less than significant impact is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. As such, no further analysis is required.

Threshold (c) Would the project 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?

Previous Significance Determination: The Modified Ellis Project EIR concluded that implementation of the Specific Plan would not result in landslide, lateral spreading, subsidence, liquefaction and/or collapse.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

Typically, subsidence occurs in areas underlain by soils that are highly compressible, such as soft clays or silts and unconsolidated sand or fill material. Thus, implementation of the proposed Amendment would have a less than significant impact relative to geologically unstable soils. Landslide and liquefaction potential for the Ellis Specific Plan site is considered low, and thus, implementation of future development under the proposed Amendment would also be low, as the land area covered by the proposed Amendment is within the same development footprint covered by the adopted Specific Plan. This determination of less than significant impact is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. As such, no further analysis is required.

Threshold (d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property?

Previous Significance Determination: The Modified Ellis Project EIR concluded that, with mitigation, implementation of the Specific Plan would not be subject to expansive soil.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

Because the Ellis Specific Plan site contains clay-type soils, on-site soils are potentially expansive. No land uses or densities are proposed as part of the Amendment that have the potential to increase the severity or likelihood of expansive soils, and thus impacts are less than significant. This determination of less than significant impact is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. As such, no further analysis is required.

Threshold (e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewer is not available for the disposal of waste water?

Previous Significance Determination: The Modified Ellis Project EIR concluded that no impacts would occur with regard to use of septic tanks.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

No septic tanks would be used in any land uses developed under the Specific Plan or the proposed Amendment. As a result, no impacts associated with the use of septic tanks would occur as part of the proposed Amendment's implementation.

Cumulative Impacts

As discussed above, the proposed Amendment to the Specific Plan would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. Amendment-related impacts are

consistent with the environmental effects previously identified certified Modified Ellis Project EIR. The proposed Amendment would be consistent with the overall land use and development regulations contained in the Ellis Specific Plan. Additionally, future development that may occur under the proposed Amendment would be located within the same footprint previously analyzed in the Modified Ellis Project EIR. Therefore, no additional adverse cumulative geological impacts would occur. This finding is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. Less than significant impacts would occur.

Mitigation Program

The proposed Amendment to the Specific Plan would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. The mitigation measures provided in the Modified Ellis Project EIR continue to be applicable and no additional measures are required.

VII. GREENHOUSE GAS EMISSIONS

Threshold (a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Previous Significance Determination: The previously certified EIR prepared for the Ellis Specific Plan found that GHG emissions generated by the proposed Specific Plan (both construction and operational-related) would exceed the applicable threshold set forth in SJVAPCD's guidance because the proposed Project's GHG emissions cannot feasibly be reduced to 29 percent below business as usual (BAU) despite the incorporation of numerous sustainability measures. The impact is significant and unavoidable.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

No changes would occur to the overall allowable number of residential units or overall square footage previously approved as part of the Ellis Specific Plan.

The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. As such, no further analysis is required.

Threshold (b) Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Previous Significance Determination: As identified in the previously certified EIR prepared for the Ellis Specific Plan, Specific Plan implementation would not conflict with or otherwise interfere with achievement of CARB's Scoping Plan, the City's Sustainability Action Plan, the California Attorney General's Office, and the California Air Pollution Control Officer's Association (CAPCOA) applicable measures.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

No changes would occur to the overall allowable number of residential units or overall square footage previously approved as part of the Ellis Specific Plan.

As such, the Amendment would be consistent with local and regional plans designed to reduce GHG emissions. No conflict or interference with achievement of an applicable GHG emissions reduction plan would occur.

Cumulative Impacts

As discussed above, the proposed Amendment to the Specific Plan would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. Project-related impacts are consistent with the environmental effects previously identified certified EIR.

No changes would occur to the overall allowable number of residential units or overall square footage previously approved as part of the Ellis Specific Plan. Therefore, no additional adverse cumulative greenhouse gas impacts would occur. This finding is supported by the previously certified EIR prepared

for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. Less than significant impacts would occur.

Mitigation Program

The proposed Amendment to the Specific Plan would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. The mitigation measures provided in the Modified Ellis Project EIR continue to be applicable and no additional measures are required.

VIII. HAZARDS AND HAZARDOUS MATERIALS

Threshold (a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Previous Significance Determination: As identified in the previously certified EIR prepared for the Ellis Specific Plan, Specific Plan implementation would not create a significant hazard to the public with respect to hazardous materials.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

No changes would occur to the overall allowable number of residential units or overall square footage previously approved as part of the Ellis Specific Plan.

Therefore, the proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed.

Threshold (b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment?

Previous Significance Determination: As identified in the previously certified EIR prepared for the Ellis Specific Plan, with mitigation, Specific Plan implementation would not release hazardous materials into the environment.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

The Amendment proposes overall land uses and densities that were previously analyzed and located within the same footprint as in the Modified Ellis Project EIR. Therefore, as it relates to the creation of hazards or routine transport and disposal of hazards, the proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed.

Threshold (c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Previous Significance Determination: As identified in the previously certified EIR prepared for the Ellis Specific Plan, Specific Plan implementation would not emit hazardous materials within one quarter mile of a school.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

No changes would occur to the overall allowable number of residential units or overall square footage previously approved as part of the Ellis Specific Plan.

Additionally, changes proposed as part of the Amendment would be located within the same footprint as what was previously analyzed in the Modified Ellis Project EIR. Therefore, the proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed.

Threshold (d) Would the project 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 create a significant hazard to the public or the environment?

Previous Significance Determination: As identified in the previously certified EIR prepared for the Ellis Specific Plan, the Ellis Specific Plan Area is not listed on any hazardous materials site lists.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

The Ellis Specific Plan Area is not listed on any hazardous materials site lists, and thus, future development that may occur under the proposed Amendment would not be located on hazardous site lists. This determination of less than significant impact is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. As such, no further analysis is required.

Threshold (e) Would the project be 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, result in a safety hazard for people residing or working in the project area?

Previous Significance Determination: As identified in the previously certified EIR prepared for the Ellis Specific Plan, implementation of the Ellis Specific Plan would not cause a safety hazard associated with being located within an airport land use plan.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

The proposed Amendment does not include development of uses that are restricted in the 2009 Airport Land Use Compatibility Plan Outer Approach/Departure Zone 4 Safety Zone. The Specific Plan includes a land use (Limited Use) that covers the airport safety zone, and includes development standards and restrictions on land uses within that area to guide development. The proposed Amendment would increase the acreage of the Limited Use Zone by approximately 4 acres. This determination of less than significant impact is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. As such, no further analysis is required.

Threshold (f) Would the project be located within the vicinity of a private airstrip, result in a safety hazard for people residing or working in the project area?

Previous Significance Determination: As identified in the previously certified EIR prepared for the Ellis Specific Plan, the Ellis Specific Plan site is not located within 2 miles of a private airstrip.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

The Ellis Specific Plan site is not located within 2 miles of a private airstrip and no impact would occur. This determination is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. As such, no further analysis is required.

Threshold (g) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Previous Significance Determination: The City's General Plan Safety Element 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 Ellis Specific Plan does not include any actions that would interfere with emergency response and evacuation plan policies. Primary access to all major roads would be maintained during construction of the proposed Project and the Specific Plan provides for streets consisting of two lanes with shoulders on each side to provide for emergency vehicle parking and access. Thus, since the building footprint is no different under the proposed Amendment, no associated impacts would occur.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

No component of the proposed Amendment would create future development that would impair or physically interfere with an adopted emergency response or evacuation plan. This determination is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. As such, no further analysis is required.

Threshold (h) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas?

Previous Significance Determination: The Ellis Specific Plan site is not located within a High or Moderate fire hazard area, per the California Department of Forestry. No impacts would occur.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

The Ellis Specific Plan site is not located within a High or Moderate fire hazard area, per the California Department of Forestry. Thus, because the building footprint is coterminous with the previously adopted Ellis Specific Plan, no impacts would occur. This determination of no impact is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. As such, no further analysis is required.

Cumulative Impacts

As discussed above, the proposed Amendment to the Specific Plan would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. Project-related impacts are consistent with the environmental effects previously identified certified Modified Ellis Project EIR. The proposed Amendment would be consistent with the overall land use and development regulations contained in the Ellis Specific Plan. Therefore, no additional adverse cumulative hazards impacts would occur. This finding is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. Less than significant impacts would occur.

Mitigation Program

The proposed Amendment to the Specific Plan would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. The mitigation measures provided in the Modified Ellis Project EIR continue to be applicable and no additional measures are required.

VII. HYDROLOGY AND WATER QUALITY

Threshold (a) Would the project violate any water quality standards or waste discharge requirements?

Threshold (f) Would the project otherwise substantially degrade water quality?

Previous Significance Determination: As identified in the previously certified EIR prepared for the Ellis Specific Plan, with mitigation, the Ellis Specific Plan would not violate or substantially degrade water quality.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

Implementation of the proposed Amendment would not impact water quality, as the changes are limited to a shift in land use designations and acreages. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. As such, no further analysis is required.

Threshold (b) Would the project substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level?

Previous Significance Determination: As identified in the previously certified EIR prepared for the Ellis Specific Plan, implementation of the Ellis Specific Plan would not substantially deplete groundwater supply.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

Changes proposed as part of the proposed Amendment are limited to a shift in land use acreages. The overall density and intensity of land uses would not increase, and thus, would not increase the demand for groundwater. The results of the previously certified EIR prepared for the Ellis Specific Plan support this finding. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. As such, no further analysis is required.

Threshold (c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Threshold (d) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding?

Previous Significance Determination: As identified in the previously certified EIR prepared for the Ellis Specific Plan, with mitigation, implementation of the Ellis Specific Plan would not substantially alter the existing drainage pattern of the site.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

Changes proposed as part of the proposed Amendment are limited to a shift in land use designations and acreages within the same footprint previously analyzed in the Modified Ellis Project EIR. Thus, no increased or substantially different impacts associated with onsite drainage would occur. The results of the previously certified EIR prepared for the Ellis Specific Plan support this finding. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. As such, no further analysis is required.

Threshold (e) Would the project create or contribute runoff water, which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?

Previous Significance Determination: As identified in the previously certified EIR prepared for the Ellis Specific Plan, with mitigation, implementation of the Ellis Specific Plan would not create or contribute runoff water that exceeds the capacity of existing or planned storm water drainage systems.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

Changes proposed as part of the proposed Amendment are limited to a shift in land use designations and acreages within the same footprint previously analyzed in the Modified Ellis Project EIR. Thus, no increased or substantially different impacts associated with onsite drainage would occur. The results of the previously certified EIR prepared for the Ellis Specific Plan support this finding. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. As such, no further analysis is required.

Threshold (g) Would the project place housing/structures within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

Threshold (h) Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Previous Significance Determination: As identified in the previously certified EIR prepared for the Ellis Specific Plan, the Ellis Specific Plan area is not located within a 100-year flood hazard area. As a result, no impact would occur.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

The Ellis Specific Plan is not located within a 100-year flood hazard area. As a result, no impact would occur given that the proposed Amendments are within the Specific Plan development footprint previously analyzed. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. As such, no further analysis is required.

Threshold (i) Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Threshold (j) Would the project result in inundation by seiche, tsunami or mudflow?

Previous Significance Determination: As identified in the previously certified EIR prepared for the Ellis Specific Plan, the Ellis Specific Plan area is not located in close proximity to an area subject to flooding due to tsunamis or seiches resulting in levee failure, and would not be subject to mudflows as a result of a seiche. As a result, less than significant impacts would occur.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

The Ellis Specific Plan area is not located in close proximity to an area subject to flooding due to tsunamis or seiches resulting in levee failure, and would not be subject to mudflows as a result of a seiche. As a result, implementation of the proposed Amendment would result in less than significant impacts given that the Amendment area is within the Specific Plan development footprint previously analyzed. This determination of less than significant impact is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. As such, no further analysis is required.

Cumulative Impacts

As discussed above, the proposed Amendment to the Specific Plan would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. Project-related impacts are consistent with the environmental effects previously identified certified Modified Ellis Project EIR. The proposed Amendment would be consistent with the overall land use and development regulations contained in the Ellis Specific Plan. Therefore, no additional adverse cumulative hydrology impacts would occur. This finding is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. Less than significant impacts would occur.

Mitigation Program

The proposed Amendment to the Specific Plan would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. The mitigation measures provided in the Modified Ellis Project EIR continue to be applicable and no additional measures are required.

IX. LAND USE AND PLANNING

Threshold (a) Would the project physically divide an established community?

Previous Significance Determination: As identified in the previously certified EIR prepared for the Ellis Specific Plan, implementation of the Ellis Specific Plan area would not divide an established community. As a result, no impacts would occur.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

The proposed Amendment would make minor modifications to the land use designations, acreages, and square footage previously identified within the existing Ellis Specific Plan. However, the proposed land use designations and intensity of uses is consistent with the adopted Ellis Specific Plan. The proposed Amendment is consistent with the City's overall planning vision, and would not divide an established community. The finding of no impact is supported by the previously certified EIR prepared for the Ellis Specific Plan which found that no potentially significant impacts to physical division of a community would occur. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed.

Threshold (b) Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Previous Significance Determination: As identified in the previously certified EIR prepared for the Ellis Specific Plan, implementation of the Ellis Specific Plan area would not conflict with land use plans, policies, or regulations. As a result, no impacts would occur.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

It is not anticipated that the proposed Amendment would conflict with applicable land use plans, policies, or regulations, including the Ellis Specific Plan, the City's current General Plan, applicable citywide infrastructure master plans, and regional plans. The purpose of the proposed Amendment is to update certain land use designations within the existing Ellis Specific Plan. The overall existing footprint of the Ellis Specific Plan has not changed since the analysis in the Modified Ellis Project EIR, nor has the overall number of dwelling units proposed. Rather, the Specific Plan Amendment proposes to "shift" land uses, acreages, and square footage slightly.

The proposed Project also includes a second amendment to the existing Amended and Restated Development Agreement (DA) for the Ellis Specific Plan. As noted under "Proposed Revisions to the Approved Project" on Page 5 of this Addendum, the key changes to the existing Development Agreement are as follows:

- City and Owner (identified in the DA as Surland Communities, LLC) to execute an agreement to provide for, among other things, the design, funding and construction of the Swim Center and certain associated infrastructure improvements;
- States that Owner may in the future apply to the City for subsequent DA Amendments to bring additional property outside of the existing Ellis Specific Plan area within the coverage, terms and conditions of the Development Agreement. This additional property is defined in the proposed DA Amendment as “DA Property” (in contrast with the property within the existing Ellis Specific Plan Area, which is defined in the DA as “Property”). Before this additional property (the “DA Property”) can become subject to the coverage of the DA, it must be annexed to the City through normal annexation and planning procedures, which include all necessary San Joaquin County Local Agency Formation Commission approvals, all necessary City Council approvals, and compliance with all applicable California Environmental Quality Act requirements. The City Council will retain its full discretion to approve, conditionally approve, or deny any application by Owner to bring such additional DA Property within the coverage of the DA;
- Modifies the City’s Growth Management Ordinance Guidelines to expand the scope of Owner’s eligibility for Residential Growth Allotments (RGAs) and to allow Owner to transfer RGAs issued to Owner under the DA to additional properties which, in the future, come within the coverage of the DA through future DA Amendments;
- Owner to be granted a right-of-first-refusal for Residential Growth Allotments (RGAs) not accepted by other property owners, up to the City’s entire maximum RGA allocation for that year;
- The effective term of Building Permits issued to the Project Applicant shall be extended to 24 months;
- Owner may execute an agreement with the City to provide for payment of development impact fees at close of escrow for each residential unit, rather than at issuance of building permit or certificate of occupancy;
- Modifications to park approval process for parks within the Project site;
- City and Owner to execute a Park & Landscape Maintenance Agreement;
- City and Owner to cooperate to annex all property covered by the Development Agreement (as it now exists or may exist in the future) to the Ellis Community Facilities District;
- City and Owner to execute a Public Infrastructure Credit & Reimbursement Agreement.

As noted on page 5 of this Addendum, Development Agreement Properties or additional property (“DA Property”) not currently within the boundaries of the Ellis Specific Plan are not evaluated in this Addendum, as they are unknown at this time, and any analysis related to their respective impacts would be too speculative for evaluation. While the DA provides the opportunity for the owner to bring additional properties outside of the existing Ellis Specific Plan area into the coverage of the DA, doing so requires the additional properties to be annexed to the City through normal annexation and planning procedures, which include all necessary San Joaquin County Local Agency Formation Commission approvals, all necessary City Council approvals, and compliance with all applicable California Environmental Quality Act requirements. As noted above, the DA is intended to preclude the extension of any rights to additional property, until such time as the DA Property is processed through all of the City’s conventional planning

processes, including securing applicable general plan amendments/zone changes, annexation, sphere of influence boundary modifications and complies with all requirements under CEQA for discretionary actions related to the inclusion of DA Properties within the boundaries of Ellis.

Based on the analysis and evaluation provided in this Addendum, no new significant impacts would occur because of the proposed second amendment to the DA, nor would there be any substantial increase in the severity of any previously-identified significant environmental impacts.

As set forth in the City's General Plan, the General Plan designations for the Ellis Specific Plan area includes Traditional Residential-Ellis (TR-Ellis), Commercial, and Village Center. The currently proposed Amendment to the Ellis Specific Plan would decrease the Residential Mixed designation from 284.7 acres to 260 acres, increase the Village Center designation from 5.7 to 14 acres, eliminate the Commercial designation, increase the Limited Use designation from 26.2 acres to 30 acres, and add 17 acres in a new designation known as "Residential Estates."

The Project would also require a General Plan Amendment to provide consistency between the General Plan Land Use Designations Map and the changes proposed in the Specific Plan Amendment. Additionally, the Project would also include a Zoning Ordinance Amendment. The purpose of the Zoning Ordinance Amendment is to add the Ellis Specific Plan Zone to the list of zoning districts in the City. All property within the Ellis Specific Plan Area would be zoned Ellis Specific Plan Zone and the City's Zoning Map would be amended to reflect this change. The modifications would result in no direct or indirect change to the existing physical environment. Overall, the proposed Amendments are consistent with the underlying land use and zoning designations that have been included in local and regional planning efforts. No impact would occur. This finding is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. As such, no further analysis is required.

Threshold (c) Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Previous Significance Determination: As identified in the previously certified EIR prepared for the Ellis Specific Plan, implementation of the Ellis Specific Plan area would not conflict with any habitat conservation plans or natural community plans. As a result, no impacts would occur.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

Future development that may occur under the proposed Amendment would be subject to the regulations and provisions of the San Joaquin Multi Species Conservation Plan (SJMSCP). As a result, no impacts relative to conservation plans would occur. This finding is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed.

Cumulative Impacts

As discussed above, the proposed Amendment to the Specific Plan would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. Project-related impacts are consistent with the environmental effects previously identified certified Modified Ellis Project EIR. The proposed Amendment would be consistent with the land use and development regulations contained in the Ellis Specific Plan. Therefore, no additional adverse cumulative land use impacts would occur. This finding is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. Less than significant impacts would occur.

Mitigation Program

None identified.

X. MINERAL RESOURCES

Threshold (a) Would the project 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?

Threshold (b) Would the project result in the loss of availability of a locally important mineral resources recovery site delineated on a local general plan, specific plan, or other land use plan?

Previous Significance Determination: As identified in the previously certified EIR prepared for the Ellis Specific Plan, the Ellis Specific Plan site is not located in an area designated for Aggregate use in the 2011 General Plan, and impacts related to the loss of availability of known mineral resources are considered less than significant. As a result, no impacts would occur.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

Cumulative Impacts

As discussed above, the proposed Amendment to the Specific Plan would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. Project-related impacts are consistent with the environmental effects previously identified certified Modified Ellis Project EIR. The proposed Amendment would be consistent with the development regulations contained in the Ellis Specific Plan. Therefore, no additional adverse cumulative mineral resources impacts would occur. This finding is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. Less than significant impacts would occur.

Mitigation Program

None identified.

XI. NOISE

Threshold (a) Would the project result in the exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Previous Significance Determination: As identified in the previously certified EIR prepared for the Ellis Specific Plan, the Ellis Specific Plan would result in excess noise. A significant and unavoidable impact would occur.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

The density and intensity of land uses proposed under the Amendment are consistent with the Ellis Specific Plan; thus, impacts relative to excessive noise would be similar to what was identified in the Modified Ellis Project EIR and no new impact or increase in the severity of a previously identified impact would occur.

Threshold (b) Would the project result in the exposure of persons to or generation of, excessive groundborne vibration or groundborne noise levels?

Previous Significance Determination: The Modified Ellis Project EIR determined that vibration impacts would be generated by the Project temporarily during construction; however, impacts would be less than significant

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

The overall density and intensity of land uses proposed under the Amendment are consistent with the Ellis Specific Plan; thus, impacts relative to vibration would be similar to what was identified in the Modified Ellis Project EIR and no new impact or increase in the severity of a previously identified impact would occur.

Threshold (c) Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Previous Significance Determination: As identified in the previously certified EIR prepared for the Ellis Specific Plan, the Ellis Specific Plan would result in a substantial permanent increase in ambient noise levels. A significant and unavoidable impact would occur.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

The overall density and intensity of land uses proposed under the Amendment are consistent with the Ellis Specific Plan; thus, impacts relative to a permanent increase in noise would be similar to what was identified in the Modified Ellis Project EIR and no new impact or increase in the severity of a previously identified impact would occur. This determination is consistent with the previously certified EIR prepared

for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed.

Threshold (d) Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Previous Significance Determination: As identified in the previously certified EIR prepared for the Ellis Specific Plan, the Ellis Specific Plan would result in a substantial periodic increase in ambient noise levels. A significant and unavoidable impact would occur.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

The overall density and intensity of land uses proposed under the Amendment are consistent with the Ellis Specific Plan; thus, impacts relative to a periodic increase in noise would be similar to what was identified in the Modified Ellis Project EIR. and no new impact or increase in the severity of a previously identified impact would occur. This determination is consistent with the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed.

Threshold (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 expose people residing or working in the project area to excessive noise levels?

Previous Significance Determination: As identified in the previously certified EIR prepared for the Ellis Specific Plan, implementation of the Ellis Specific Plan would not substantially expose people to excessive airport noise levels with mitigation incorporated.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

The overall density and intensity of land uses proposed under the Amendment are consistent with the Ellis Specific Plan; thus, impacts relative to airport noise would be similar to what was identified in the Modified Ellis Project EIR, and no new impact or increase in the severity of a previously identified impact would occur. This determination is consistent with the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed.

Threshold (f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Previous Significance Determination: As identified in the previously certified EIR prepared for the Ellis Specific Plan, the Specific Plan area is not located within two miles of a private airstrip. No impacts would occur.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

As identified in the previously certified EIR prepared for the Ellis Specific Plan, the Specific Plan area is not located within two miles of a private airstrip. No impacts would occur.

Cumulative Impacts

As discussed above, the proposed Amendment to the Specific Plan would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. Project-related impacts are consistent with the environmental effects previously identified certified Modified Ellis Project EIR. The proposed Amendment would be consistent with the development regulations contained in the Ellis Specific Plan. Therefore, no additional adverse cumulative noise impacts would occur. This finding is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. Less than significant impacts would occur.

Mitigation Program

The proposed Amendment to the Specific Plan would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. The mitigation measures provided in the Modified Ellis Project EIR continue to be applicable and no additional measures are required.

XII. POPULATION AND HOUSING

Threshold (a) Would the project induce substantial population growth in an area, either directly or indirectly?

Previous Significance Determination: As identified in the previously certified EIR prepared for the Ellis Specific Plan, the Ellis Specific Plan would not induce substantial population growth, and thus less than significant impacts would occur.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

The proposed Amendment is consistent with the City's overall planning vision, which assumes residential and commercial uses would be developed within the Specific Plan area. The amount of new residential growth facilitated by the Ellis Specific Plan (between 1,000 and 2,250 housing units) would be within the range of housing development planned for in the City of Tracy General Plan and thus would result in less than significant impacts on housing growth. The proposed Amendment would not induce substantial population growth beyond that already projected to occur. Because the population growth associated with the Ellis Specific Plan is within the estimates projected by San Joaquin Council of Governments (SJCOG), and was also considered in the General Plan, the Ellis Specific Plan would not exceed the amount of growth projected for the City for the year 2025, and thus would result in less than significant impacts on population growth. Jobs generated by the Ellis Specific Plan would result in less than significant indirect increases in population growth.

No potentially significant impacts to population and housing have been identified. This determination of less than significant impact is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed.

Threshold (b) Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

Threshold (c) Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

Previous Significance Determination: As identified in the previously certified EIR prepared for the Ellis Specific Plan, the Ellis Specific Plan would not displace substantial numbers of people or housing, and thus less than significant impacts would occur.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

As previously discussed, the proposed Amendment would make minor modifications to the Ellis Specific Plan, and would not involve the displacement of people or housing. As a result, there are no impacts from displacing people or housing. This determination is consistent with the previously identified determination of less than significant impact which is supported by the previously certified EIR prepared

for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed.

Cumulative Impacts

As discussed above, the proposed Amendment to the Specific Plan would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. Project-related impacts are consistent with the environmental effects previously identified certified Modified Ellis Project EIR. The proposed Amendment would be consistent with the land use and development regulations contained in the Ellis Specific Plan. Therefore, no additional adverse cumulative land use impacts would occur. This finding is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. Less than significant impacts would occur.

Mitigation Program

None identified.

XIII. PUBLIC SERVICES

Threshold (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: fire protection, police protection, schools, parks, and other public facilities?

i. Fire Protection

ii. Police Protection

Previous Significance Determination: As identified in the previously certified EIR prepared for the Ellis Specific Plan, with mitigation, the Ellis Specific Plan would not result in a substantial adverse impact associated with the need for new police or fire facilities, and thus less than significant impacts would occur.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

The proposed Amendment is consistent with the overall density and intensity of development analyzed in the Ellis Specific Plan EIR, and as such, would not create a significant or more substantial impact relative to police and/or fire services. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. As such, no further analysis is required.

iii. Schools

iv. Parks

v. Other Public Facilities

Previous Significance Determination: As identified in the previously certified EIR prepared for the Ellis Specific Plan, the Ellis Specific Plan would not result substantial adverse impact associated with the need for new school, park, or other facilities, and thus less than significant impacts would occur.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

Any future population increases associated with development under the proposed Addendum have already been accounted for and analyzed in the previous Modified Ellis Project EIR. The Amendment is consistent with the overall density and intensity of land uses previously identified in the Ellis Specific Plan, and as such, does not impact schools, parks, or other public facilities in any greater way than what was previously analyzed. Less than significant impacts would occur. This determination of less than significant impact is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. As such, no further analysis is required.

Cumulative Impacts

As discussed above, the proposed Amendment to the Specific Plan would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. Project-related impacts are consistent with the environmental effects previously identified certified Modified Ellis Project EIR. The proposed Amendment would be consistent with the land use and development regulations contained in the Ellis Specific Plan. Therefore, no additional adverse cumulative public service impacts would occur. This finding is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. Less than significant impacts would occur.

Mitigation Program

The proposed Amendment to the Specific Plan would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. The mitigation measures provided in the Modified Ellis Project EIR continue to be applicable and no additional measures are required.

XIV. RECREATION

Threshold (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?

Threshold (b) Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Previous Significance Determination: As identified in the previously certified EIR prepared for the Ellis Specific Plan, the Ellis Specific Plan would not increase the use of existing parks or increase the need for parks, and thus less than significant impacts would occur.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

The proposed Amendment would not generate population growth beyond what has been anticipated in the City's General Plan for the Specific Plan area; therefore, it would not create an increased demand for recreational facilities. Therefore, impacts would remain less than significant. This determination of less than significant impact is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. As such, no further analysis is required.

Cumulative Impacts

As discussed above, the proposed Amendment to the Specific Plan would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. Project-related impacts are consistent with the environmental effects previously identified certified Modified Ellis Project EIR. The proposed Amendment would be consistent with the land use and development regulations contained in the Ellis Specific Plan. Therefore, no additional adverse cumulative recreation impacts would occur. This finding is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. Less than significant impacts would occur.

Mitigation Program

None identified.

XIV. TRANSPORTATION/TRAFFIC

A Traffic Memorandum was prepared by Kimley-Horn in April 2017 to identify whether the changes proposed as part of the Amendment would result in greater or more significant traffic impacts when compared to the existing traffic analysis contained in the Modified Ellis Project EIR. The Traffic Memorandum is located as Appendix A of this Addendum EIR.

Threshold (a) Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Previous Significance Determination: Impacts of the Ellis Specific Plan to the effectiveness of the circulation system were considered significant and unavoidable in the previously certified EIR.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

As previously discussed, a Traffic Memorandum was prepared for the Amendment. The Traffic Memorandum evaluates the proposed Amendment to the Specific Plan by developing trip generation estimates for the revised land use mix/shift, estimating the trip distribution for the revised land use mix/shift, and analyzing AM and PM peak hour LOS for the following future intersections:

1. Driveway #1 / Corral Hollow Road
2. Driveway #2 / Corral Hollow Road
3. Driveway #3 / Lammers Road

The Ellis Specific Plan site, study intersections, and existing roadway network are shown in Figure 5, *Existing Roadway Network*.

Trip generation was prepared using City of Tracy average rates for the Project. Table 2, *Trip Generation*, shows the estimated trip generation for the approved Ellis Specific Plan and the proposed Ellis Specific Plan.

The estimated net trip generation for the project is 1400 (309 IN / 1091 OUT) in the AM peak and 2780 (1661 IN / 1119 OUT) in the PM peak. The net estimates presented includes the assumed calibration factors and internal reduction. Land use assumptions included up to 2250 mixed residential units, 140 retail jobs, 90 service (office) jobs, 80 warehousing jobs, an aquatic center (three pools), and 19 acres of parks. The parks were assumed to only generate internal trips, primarily comprised of walk and bike trips.

Revised trip generation estimates are shown in Table 2, *Trip Generation*, based on a revised land use plan (proposed Amendment). The estimated net trip generation for the proposed Amendment is 1521 (384 IN / 1137 OUT) in the AM peak and 3155 (1833 IN / 1322 OUT) in the PM peak. The net estimates presented includes the same calibration factors and internal reductions assumed in the 2007 Ellis Specific

Plan Transportation Impact Analysis. Land use assumptions included up to 2259 mixed residential units, 220 retail jobs, 210 service (office) jobs, 430,000 square feet of self-storage space, an aquatic center (three pools), and 19 acres of parks. The parks were again assumed to only generate internal trips, primarily comprised of walk and bike trips.

The proposed Amendment land use changes to the Ellis Specific Plan include:

1. Residential – propose to add 9 residential estate units
2. Retail – propose to add 70 jobs
3. Service (Office) – propose to add 120 jobs
4. Other – propose to remove warehousing and add 430 KSF of self-storage
5. Aquatic Center & Parks – no change

Table 2: Trip Generation

Land Uses	Project Size	AM PEAK HOUR			PM PEAK HOUR		
		Total Peak Hour	IN	/ OUT	Total Peak Hour	IN	/ OUT
Approved Project Uses and Trip Generation (from Ellis)							
Residential Low Density	789 DU	513	77	/ 436	1002	641	/ 361
Residential Medium Density	1211 DU	787	118	/ 669	1538	984	/ 554
Residential High Density	250 DU	93	13	/ 80	180	115	/ 65
Retail	140 Jobs	98	69	/ 29	550	248	/ 302
Service (Office)	90 Jobs	31	27	/ 4	43	12	/ 31
Other (Warehousing)	80 Jobs	25	23	/ 2	27	6	/ 21
Aquatic Center	3 Pools	30	21	/ 9	136	71	/ 65
Parks	19 Acres	-	-	/ -	-	-	/ -
Gross Total Residential		1393	208	/ 1185	2720	1740	/ 980
Gross Total Commercial		154	119	/ 35	620	266	/ 354
Gross Total		1577	348	/ 1229	3476	2077	/ 1399
Calibrated Total		1535	339	/ 1196	3393	2027	/ 1366
Internal Reduction (8.8% AM, 18.1% PM)		-135	-30	/ -105	-613	-366	/ -247
Net Total		1400	309	/ 1091	2780	1661	/ 1119
Proposed Project Uses and Trip Generation							
Residential Low Density	789 DU	513	77	/ 436	1002	641	/ 361
Residential Medium Density	1211 DU	787	118	/ 669	1538	984	/ 554
Residential High Density	250 DU	93	13	/ 80	180	115	/ 65
Residential Estates (Single Family)	9 DU	6	1	/ 5	11	7	/ 4
Retail (Village Center) - 110 KSF	220 Jobs	154	108	/ 46	865	389	/ 476
Service (Office) - 70 KSF (40 in Village and 30 in Limited Use)	210 Jobs	71	62	/ 9	101	29	/ 72
Other (Self Storage) - 430 KSF	430 KSF	60	33	/ 27	112	56	/ 56
Aquatic Center	3 Pools	30	21	/ 9	136	71	/ 65
Parks	19 Acres	-	-	/ -	-	-	/ -
Gross Total Residential		1399	209	/ 1190	2731	1747	/ 984
Gross Total Commercial		285	203	/ 82	1078	474	/ 604
Gross Total		1714	433	/ 1281	3945	2292	/ 1653
Calibrated Total (per previous TIA)		1668	421	/ 1247	3851	2237	/ 1614
Internal Reduction (8.8% AM, 18.1% PM, per previous TIA)		-147	-37	/ -110	-696	-404	/ -292
Net Total		1521	384	/ 1137	3155	1833	/ 1322
Trip Generation Summary							
Approved Net Total		1400	309	/ 1091	2780	1661	/ 1119
Proposed Net Total		1521	384	/ 1137	3155	1833	/ 1322
Difference (Proposed - Approved)		121	75	/ 46	375	172	/ 203

Notes:

du = dwelling unit

- Trip generation based on the model-derived rates for Single Family Residential, Multi-Family Residential, Retail jobs and Service jobs, as follows:
 Single Family AM Rate: T = 0.65 (X) (15% in, 85% out); PM Rate: T = 1.27 (X) (64% in, 36% out); T = Trip ends; X = Dwelling Units
 Multi-Family AM Rate: T = 0.37 (X) (14% in, 86% out); PM Rate: T = 0.72 (X) (64% in, 36% out); T = Trip ends; X = Dwelling Units
 Retail AM Rate: T = 0.7 (X) (70% in, 30% out); PM Rate: T = 3.93 (X) (45% in, 55% out); T = Trip ends; X = Jobs
 Service AM Rate: T = 0.34 (X) (88% in, 12% out); PM Rate: T = 0.48 (X) (29% in, 71% out); T = Trip ends; X = Jobs
 Other (Warehousing) AM Rate: T = 0.31 (X) (91% in, 9% out); PM Rate: T = 0.34 (X) (24% in, 76% out); T = Trip ends; X = Jobs
 Other (Self Storage) AM Rate: T = 0.14 (X) (55% in, 45% out); PM Rate: T = 0.26 (X) (50% in, 50% out); T = Trip ends; X = KSF
- Based on the project description, we assumed a 70%/30% retail/service split of the unrestricted commercial square footage:
 60,000 sq. ft. in Village Center plus 40,000 sq. ft. in SE corner of site. Restricted commercial square footage in the Approach Zone was assumed to be warehousing. Jobs for each were based on model factors developed for Tracy: 2 employees per 1000 sq ft of retail space; 3 employees per 1000 sq ft of office space, and 1 employee per 1000 sq ft of other space.
- PM peak hour trip rate and in/out split is based on vehicle counts conducted at the Roseville Aquatic Center in October, 2000. AM peak hour trips are based on communication with staff of the Roseville Aquatic Center in August, 2006. In/out split is based on vehicle counts conducted at the Morgan Hill Aquatic Center in August, 2006.
- Neighborhood Park trips are assumed to occur primarily outside of peak hours and to be mainly internal and largely walk and bike trips

Trip Distribution and Assignment

Internal trip distribution and distribution at the two Project driveways on Corral Hollow Road would change slightly due to the changes in land use locations along the east side of the Specific Plan (i.e. more retail and office uses would be located along Ellis Drive and less intense land uses off Summit Drive), compared to the approved Specific Plan. The driveway off Lammers road would also experience a very small change in traffic volumes.

Level of Service

A Level of Service (LOS) analysis was completed due to the change in land use designations and their locations along the east side of the Specific Plan. area, and subsequently a small change would occur in project trip generation and assignments.

The following study intersections would potentially be impacted.

1. Ellis Drive / Corral Hollow Road
2. Summit Drive / Corral Hollow Road
3. Ellis Drive / Lammers Road

Table 3, *Existing Plus Project Level of Service Results* shows LOS results for Existing Plus Approved Project and Existing Plus Proposed Project.

Table 3: Existing Plus Project Level of Service Results

#	Intersection	Control Type	Existing Plus Approved Project Conditions						Existing Plus Proposed Amendment Conditions					
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour		
			Movement	Delay	LOS	Movement	Delay	LOS	Movement	Delay	LOS	Movement	Delay	LOS
1	Corral Hollow Rd / Driveway 1	Signal	Overall	31.1	C	Overall	17.1	B	Overall	32.1	C	Overall	18.6	B
2	Corral Hollow Rd / Driveway 2	Signal	Overall	18.3	B	Overall	16.0	B	Overall	20.3	C	Overall	21.5	C
3	Lammers Rd / Driveway 3	Signal	Overall	5.5	A	Overall	5.6	A	Overall	5.6	A	Overall	6.4	A

Notes:

1. Analysis performed using HCM 2010 methodologies.
2. Delay indicated in seconds/vehicle.
3. Overall level of service (LOS) standard is D.
4. Intersections that fall below City standard are highlighted and shown in **bold**.

Source: Kimley Horn and Associates, 2017.

The analysis indicates that the change in LOS does not substantially change the operating conditions at the intersections for existing plus project conditions, as the City’s LOS threshold is D, and thus the change in LOS is still acceptable by City standards. Since the change in cumulative conditions would be smaller than the change in existing conditions, the cumulative conditions would also operate acceptably. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. As such, no further analysis is required.

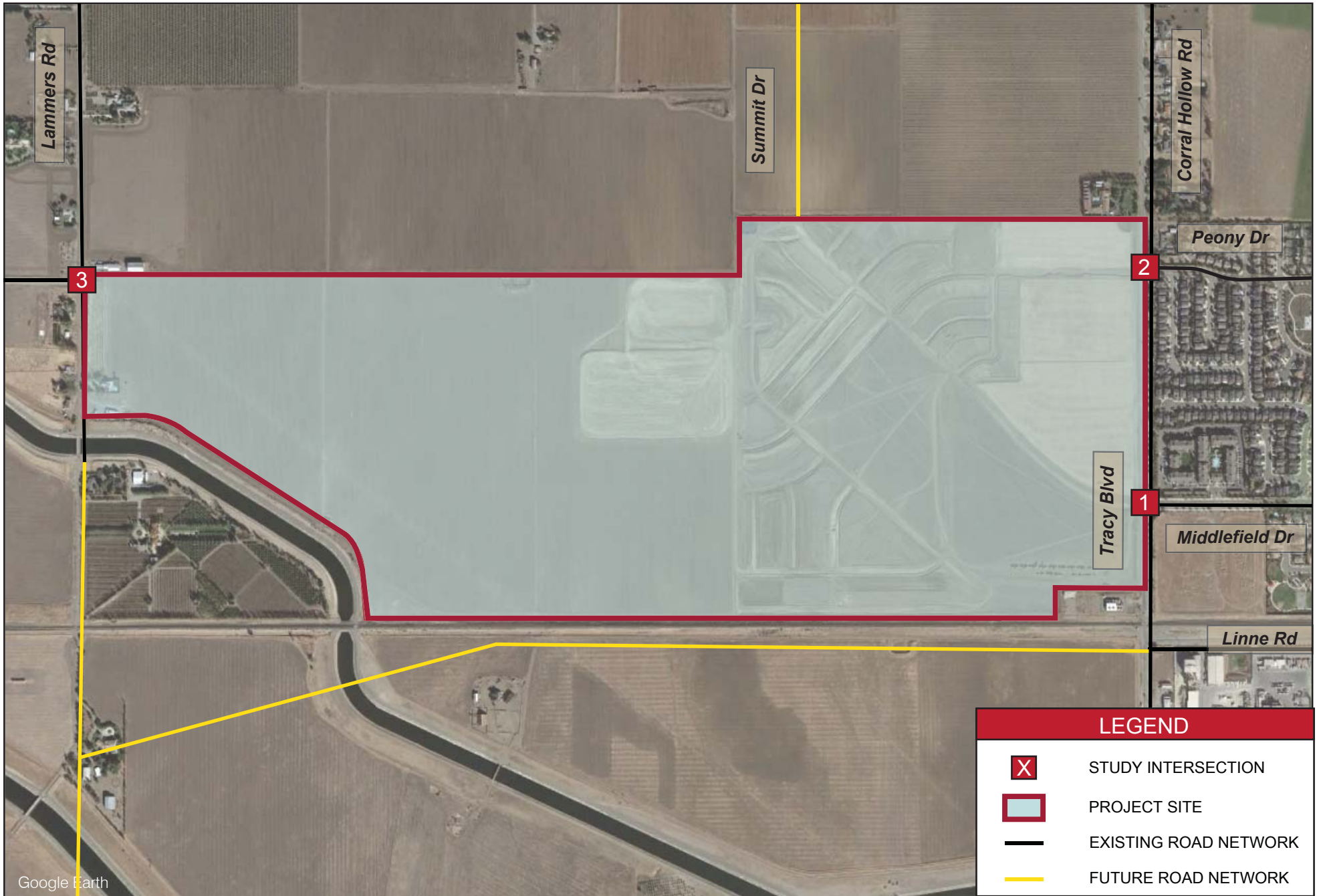


FIGURE 5: Existing Roadway Network
 Addendum to the Ellis Modified Project EIR
 City of Tracy

Threshold (b) Would the project conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Previous Significance Determination: Impacts related to conflicts with level of service standards were considered significant and unavoidable in the previously certified Modified Ellis Project EIR.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

Refer to the discussion in a), above. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. As such, no further analysis is required.

Threshold (c) Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Previous Significance Determination: As identified in the previously certified EIR, the Ellis Specific Plan would not result in a change in air traffic patterns, and thus no impact would occur.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

The proposed Amendment is consistent with the overall density and intensity of development analyzed in the Ellis Specific Plan EIR, and as such, would not create a significant or more substantial impact relative to a change in air traffic patterns. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. As such, no further analysis is required.

Threshold (d) Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Previous Significance Determination: As identified in the previously certified EIR, the Ellis Specific Plan would not result in a substantial increase in design feature hazards, and thus no impact would occur.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

The proposed Amendment is consistent with the overall density and intensity of development analyzed in the Ellis Specific Plan EIR, and as such, would not create a significant or more substantial impact relative to an increase in hazards due to design features. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. As such, no further analysis is required.

Threshold (e) Would the project result in inadequate emergency access?

Previous Significance Determination: As identified in the previously certified EIR, with mitigation, the Ellis Specific Plan would not result in inadequate emergency access, and thus less than significant impacts would occur.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

The proposed Amendment is consistent with the overall density and intensity of development analyzed in the Ellis Specific Plan EIR, and as such, would not create a significant or more substantial impact relative to inadequate emergency access. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. As such, no further analysis is required.

Threshold (f) Would the project conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Previous Significance Determination: As identified in the previously certified EIR, the Ellis Specific Plan would not result in a conflict with public transit policies, and thus less than significant impact would occur.

Amendment-Specific Analysis and Significance Determination: No substantial change from previous analysis.

The proposed Amendment is consistent with the overall density and intensity of development analyzed in the Ellis Specific Plan EIR, and as such, would not create a significant or more substantial impact relative to conflicts with public transit policies. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. As such, no further analysis is required.

Cumulative Impacts

As discussed above, the proposed Amendment to the Specific Plan would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. Amendment-related impacts are consistent with the environmental effects previously identified certified Modified Ellis Project EIR. The proposed Amendment would be consistent with the overall density and intensity of land development contained in the Ellis Specific Plan. Therefore, no additional adverse cumulative traffic related impacts would occur. This finding is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. Less than significant impacts would occur.

Mitigation Program

The proposed Amendment to the Specific Plan would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. The mitigation measures provided in the Modified Ellis Project EIR continue to be applicable and no additional measures are required.

XV. UTILITIES AND SERVICE SYSTEMS

Threshold (a) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Threshold (e) Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Previous Significance Determination: As identified in the previously certified EIR prepared for the Ellis Specific Plan, with mitigation, the Ellis Specific Plan would not exceed wastewater treatment requirements or capacities, and thus less than significant impacts would occur.

Project-Specific Analysis and Significance Determination: No substantial change from previous analysis.

Any development that would occur under the proposed Amendment would be utilizing the City's wastewater treatment facilities. Anticipated wastewater generated by the Ellis Specific Plan would not be expected to result in an exceedance of any wastewater treatment requirements of the applicable RWQCB. Given that the proposed Amendment does not increase the overall density or intensity of land uses, less than significant impacts would occur. Consistent with the determination in the Modified Ellis Project EIR, impacts would be considered less than significant. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed in the certified Modified Ellis Project EIR.

Threshold (b) Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Previous Significance Determination: As identified in the previously certified EIR prepared for the Ellis Specific Plan, the Ellis Specific Plan would not require new water or wastewater facilities, the construction of which would cause significant effects. As such, given that the development footprint under the proposed Amendment is within the previously adopted Ellis Specific Plan, less than significant impacts would occur.

Project-Specific Analysis and Significance Determination: No substantial change from previous analysis.

Anticipated water and wastewater generated by the Ellis Specific Plan would not be expected to result in an exceedance of any water or wastewater facilities. Given that the proposed Amendment does not increase the density or intensity of land uses, less than significant impacts would occur. Consistent with the determination in the Modified Ellis Project EIR, impacts would be considered less than significant. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed in the certified Modified Ellis Project EIR.

Threshold (c) Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which would cause significant environmental effects?

Previous Significance Determination: As identified in the previously certified EIR prepared for the Ellis Specific Plan, with mitigation, the Ellis Specific Plan would not require new storm drainage facilities, the construction of which would cause significant effects. As such, less than significant impacts would occur.

Project-Specific Analysis and Significance Determination: No substantial change from previous analysis.

Anticipated storm drainage needs associated with the Ellis Specific Plan were not be expected to result in an exceedance of existing facilities. Given that the proposed Amendment does not increase the overall density or intensity of land uses, less than significant impacts would occur. Consistent with the determination in the Modified Ellis Project EIR, impacts would be considered less than significant. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed in the certified Modified Ellis Project EIR.

Threshold (d) Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Previous Significance Determination: As identified in the previously certified EIR prepared for the Ellis Specific Plan, there are sufficient water supplies to service the Ellis Specific Plan. As such, less than significant impacts would occur.

Project-Specific Analysis and Significance Determination: No substantial change from previous analysis.

Given that the proposed Amendment does not increase the overall density or intensity of land uses, no population increases would occur. Thus, water supply needed for development under the proposed Amendment was already previously contemplated in the Modified Ellis EIR. Consistent with the determination in the Modified Ellis Project EIR, impacts would be considered less than significant. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed in the certified Modified Ellis Project EIR.

Threshold (f) Would the project be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs?

Threshold (g) Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Previous Significance Determination: As identified in the previously certified EIR prepared for the Ellis Specific Plan, there is sufficient landfill capacity to service the Ellis Specific Plan. As such, less than significant impacts would occur.

Project-Specific Analysis and Significance Determination: No substantial change from previous analysis.

The Ellis Specific Plan site would be served by the Foothill Sanitary Landfill, which has sufficient capacity to serve the City of Tracy through the year 2082. The build-out of the Ellis Specific Plan is considered a small addition to the overall tons per day Tracy currently generates. For these reasons, solid waste needs of development that would occur under the proposed Amendments can be met and existing landfill and associated impacts are less than significant. This determination of less than significant impact is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause

neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. As such, no further analysis is required.

The City of Tracy has implemented 43 waste diversion programs and is currently exceeding its State residential disposal rate target by over 50 percent. The waste diversion programs, together with adherence to the CALGreen Code, are sufficient to ensure that implementation of the proposed Amendment would not compromise the ability to meet or perform better than the State-mandated target. Therefore, the proposed Amendment would comply with applicable statutes and regulations and the impact would be less than significant. This determination of less than significant impact is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. As such, no further analysis is required.

Cumulative Impacts

As discussed above, the proposed Amendment to the Specific Plan would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. Project-related impacts are consistent with the environmental effects previously identified certified Modified Ellis Project EIR. The proposed Amendment would be consistent with the land use and development regulations contained in the Ellis Specific Plan. Therefore, no additional adverse cumulative utilities and service systems impacts would occur. This finding is supported by the previously certified EIR prepared for the Ellis Specific Plan. The proposed Amendment would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. Less than significant impacts would occur.

Mitigation Program

The proposed Amendment to the Specific Plan would cause neither a new impact to occur, nor an increase in the severity of an impact previously disclosed. The mitigation measures provided in the Modified Ellis Project EIR continue to be applicable and no additional measures are required.

DETERMINATION OF APPROPRIATE CEQA DOCUMENTATION

Section 15162 – Subsequent EIRs and Negative Declarations

- (a) When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in light of the whole record, one of more of the following:
- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

The City of Tracy proposes to implement the Amendment within the context of the Ellis Specific Plan, as described in this Addendum. As discussed in the Environmental Impact Analysis section of this Addendum, no new or substantially more severe significant environmental effects beyond what was evaluated in the Modified Ellis Project EIR would occur.

- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

As documented herein, no circumstances associated with the location, type, setting, or operations of the proposed Amendment have substantively changed beyond what was evaluated in the Modified Ellis Project EIR; and none of the proposed Amendment elements would result in new or substantially more severe significant environmental effects than previously identified. No major revisions to the Modified Ellis Project EIR are required.

- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - (A) The project will have one or more significant environmental effects not discussed in the previous EIR or negative declaration;

No new significant environmental effects beyond those addressed in the Modified Ellis Project EIR were identified.

- (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR.
- (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

No mitigation measures or alternatives were found infeasible in the certified Modified Ellis Project EIR.

- (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

No other mitigation measures or feasible alternatives have been identified that would substantially reduce significant impacts.

- (b) If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if required under subsection (a). Otherwise, the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation.
- (c) Once a project has been approved, the lead agency's role in project approval is completed, unless further discretionary approval on that project is required. Information appearing after an approval does not require reopening of that approval. If after the project is approved, any of the conditions described in subsection (a) occurs, a subsequent EIR or negative declaration shall only be prepared by the public agency which grants the next discretionary approval for the project, if any. In this situation, no other Responsible Agency shall grant an approval for the project until the subsequent EIR has been certified or subsequent negative declaration adopted.

None of the conditions listed in subsection (a) would occur as a result of the proposed Amendment. No subsequent EIR is required.

Section 15164 – Addendum to an EIR or Negative Declaration

- (a) The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary, but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.

As described above, none of the conditions described in the State CEQA Guidelines Section 15162 calling for the preparation of a subsequent EIR have occurred.

- (b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.

None of the conditions described in Section 15162 calling for preparation of a subsequent EIR would occur as a result of the proposed Amendment. Therefore, an addendum to the certified Final EIR is the appropriate CEQA document for the proposed Amendment.

- (c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.

This Addendum will be attached to the Final EIR and maintained in the administrative record files at the City of Tracy.

- (d) The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.

The City of Tracy will consider this Addendum with the Final EIR prior to making a decision on the proposed Amendment.

- (e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's required findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

This document provides substantial evidence for City of Tracy records to support the preparation of this Addendum for the proposed Amendment.

CONCLUSION

This Addendum has been prepared in accordance with the provisions of the State CEQA Guidelines to document the finding that none of the conditions or circumstances that would require preparation of a subsequent EIR, pursuant to Sections 15162 and 15164 of the State CEQA Guidelines, exist in connection with the proposed Amendment. No major revisions would be required to the Modified Ellis Project EIR prepared for the City of Tracy as a result of the proposed General Plan Amendment and Ellis Specific Plan Amendment. No new significant environmental impacts have been identified. Since the certification of the Final EIR, there has been no new information showing that mitigation measures or alternatives once considered infeasible are now feasible, or showing that there are feasible new mitigation measures or alternatives substantially different from those analyzed in the EIR that the City declined to adopt. Therefore, preparation of a subsequent EIR is not required and the appropriate CEQA document for the proposed Amendment is this Addendum to the City of Tracy Ellis Specific Plan EIR. No additional environmental analysis or review is required for the proposed General Plan Amendment and Ellis Specific Plan Amendment. This document will be maintained in the administrative record files at City of Tracy City Hall.

APPENDIX A

TRAFFIC MEMORANDUM

MEMORANDUM

From: Frederik Venter, P.E., Kimley-Horn and Associates

To: Scott Claar, City of Tracy Planning Division

Date: May 1, 2017

Re: **Ellis Specific Plan Amendment – Consistency Analysis**

The purpose of this memorandum is to indicate the consistency of the proposed Ellis Project with the traffic assumptions and supporting analysis in the previously certified Ellis Specific Plan EIR.

1. Background

The Ellis Specific Plan (“Project”) is proposed to be developed as a multiuse community. The Project site is bounded by Lammers Road in the west, Corral Hollow Road in the east, future Linne Road in the south, and crop land/future development areas in the north. Primary access to the site will be via two driveways located on Corral Hollow Road and one driveway located on Lammers Road. A secondary access point will be located on Valpico Road north of the site (through the planned Avenues residential development).

Per the City of Tracy Transportation Master Plan, Ellis is located within Tracy Future Planning Area 3 (Ellis) for which the previous Ellis Specific Plan Environmental Impact Report (EIR) was prepared and subsequently certified in January 2013.

The purpose of this analysis is to evaluate the conformance of the traffic impacts associated with the proposed Amendments to the Ellis Specific Plan Project’s with those described in the transportation/traffic section of the Modified Ellis Project EIR (“EIR”). As discussed in the EIR, the Ellis planning area includes the extent anticipated to be developed up to 2035. Specifically, this analysis seeks to determine whether the driveway level of services’ (LOS) estimated for the project are acceptable compared to what was assumed for the same site in the Ellis Specific Plan EIR. Given the assumption that the LOS remains acceptable, the CEQA mitigations measures identified within the Ellis Specific Plan EIR would be assumed to adequately address the proposed Project’s traffic impacts. If this assumption proves accurate, the proposed Project’s mitigation obligations would be limited to payment of Traffic Impact Fees to offset its potential Cumulative impacts on the City road network.

2. Introduction

This study evaluates the proposed Amendment to the Specific Plan by developing trip generation estimates for the revised land use mix/shift, estimating the trip distribution for the revised land use mix/shift, and analyzing AM and PM peak hour LOS for the following future intersections:

1. Driveway #1 / Corral Hollow Road

2. Driveway #2 / Corral Hollow Road
3. Driveway #3 / Lammers Road

The Project site and study intersections, as well as existing and cumulative roadway network are shown in **Figure 1**.

3. Trip Generation

Trip generation was prepared using City of Tracy average rates for the Project. **Table 1** shows the estimated trip generation for the approved Ellis Specific Plan and the proposed Ellis Specific Plan.

As shown in the Ellis Specific Plan Transportation Impact Analysis (2007), completed by Fehr & Peers, and **Table 1** above, the estimated net trip generation for the project is 1400 (309 IN / 1091 OUT) in the AM peak and 2780 (1661 IN / 1119 OUT) in the PM peak. The net estimates presented includes the assumed calibration factors and internal reduction. Land use assumptions included up to 2250 mixed residential units, 140 retail jobs, 90 service (office) jobs, 80 warehousing jobs, an aquatic center (three pools), and 19 acres of parks. The parks were assumed to only generate internal trips, primarily comprised of walk and bike trips.

Revised trip generation estimates are shown **Table 1** based on a revised land use plan (proposed Project). The estimated net trip generation for the proposed Project is 1521 (384 IN / 1137 OUT) in the AM peak and 3155 (1833 IN / 1322 OUT) in the PM peak. The net estimates presented includes the same calibration factors and internal reductions assumed in the 2007 study. Land use assumptions included up to 2259 mixed residential units, 220 retail jobs, 210 service (office) jobs, 430,000 square feet of self-storage space, an aquatic center (three pools), and 19 acres of parks. The parks were again assumed to only generate internal trips, primarily comprised of walk and bike trips.

The proposed Amendment land use changes to the Approved Project include:

1. Residential – propose to add 9 residential estate units
2. Retail – propose to add 70 jobs
3. Service (Office) – propose to add 120 jobs
4. Other – propose to remove warehousing and add 430 KSF of self-storage
5. Aquatic Center & Parks – no change

Table 1: Trip Generation

Land Uses	Project Size	AM PEAK HOUR			PM PEAK HOUR				
		Total Peak Hour	IN	/	OUT	Total Peak Hour	IN	/	OUT
Approved Project Uses and Trip Generation (from Ellis)									
Residential Low Density	789 DU	513	77	/	436	1002	641	/	361
Residential Medium Density	1211 DU	787	118	/	669	1538	984	/	554
Residential High Density	250 DU	93	13	/	80	180	115	/	65
Retail	140 Jobs	98	69	/	29	550	248	/	302
Service (Office)	90 Jobs	31	27	/	4	43	12	/	31
Other (Warehousing)	80 Jobs	25	23	/	2	27	6	/	21
Aquatic Center	3 Pools	30	21	/	9	136	71	/	65
Parks	19 Acres	-	-	/	-	-	-	/	-
Gross Total Residential		1393	208	/	1185	2720	1740	/	980
Gross Total Commercial		154	119	/	35	620	266	/	354
Gross Total		1577	348	/	1229	3476	2077	/	1399
Calibrated Total		1535	339	/	1196	3393	2027	/	1366
Internal Reduction (8.8% AM, 18.1% PM)		-135	-30	/	-105	-613	-366	/	-247
Net Total		1400	309	/	1091	2780	1661	/	1119
Proposed Project Uses and Trip Generation									
Residential Low Density	789 DU	513	77	/	436	1002	641	/	361
Residential Medium Density	1211 DU	787	118	/	669	1538	984	/	554
Residential High Density	250 DU	93	13	/	80	180	115	/	65
Residential Estates (Single Family)	9 DU	6	1	/	5	11	7	/	4
Retail (Village Center) - 110 KSF	220 Jobs	154	108	/	46	865	389	/	476
Service (Office) - 70 KSF (40 in Village and 30 in Limited Use)	210 Jobs	71	62	/	9	101	29	/	72
Other (Self Storage) - 430 KSF	430 KSF	60	33	/	27	112	56	/	56
Aquatic Center	3 Pools	30	21	/	9	136	71	/	65
Parks	19 Acres	-	-	/	-	-	-	/	-
Gross Total Residential		1399	209	/	1190	2731	1747	/	984
Gross Total Commercial		285	203	/	82	1078	474	/	604
Gross Total		1714	433	/	1281	3945	2292	/	1653
Calibrated Total (per previous TIA)		1668	421	/	1247	3851	2237	/	1614
Internal Reduction (8.8% AM, 18.1% PM, per previous TIA)		-147	-37	/	-110	-696	-404	/	-292
Net Total		1521	384	/	1137	3155	1833	/	1322
Trip Generation Summary									
Approved Net Total		1400	309	/	1091	2780	1661	/	1119
Proposed Net Total		1521	384	/	1137	3155	1833	/	1322
Difference (Proposed - Approved)		121	75	/	46	375	172	/	203

Notes:

du = dwelling unit

- Trip generation based on the model-derived rates for Single Family Residential, Multi-Family Residential, Retail jobs and Service jobs, as follows:
 Single Family AM Rate: T = 0.65 (X) (15% in, 85% out); PM Rate: T = 1.27 (X) (64% in, 36% out); T = Trip ends; X = Dwelling Units
 Multi-Family AM Rate: T = 0.37 (X) (14% in, 86% out); PM Rate: T = 0.72 (X) (64% in, 36% out); T = Trip ends; X = Dwelling Units
 Retail AM Rate: T = 0.7 (X) (70% in, 30% out); PM Rate: T = 3.93 (X) (45% in, 55% out); T = Trip ends; X = Jobs
 Service AM Rate: T = 0.34 (X) (88% in, 12% out); PM Rate: T = 0.48 (X) (29% in, 71% out); T = Trip ends; X = Jobs
 Other (Warehousing) AM Rate: T = 0.31 (X) (91% in, 9% out); PM Rate: T = 0.34 (X) (24% in, 76% out); T = Trip ends; X = Jobs
 Other (Self Storage) AM Rate: T = 0.14 (X) (55% in, 45% out); PM Rate: T = 0.26 (X) (50% in, 50% out); T = Trip ends; X = KSF
- Based on the project description, we assumed a 70%/30% retail/service split of the unrestricted commercial square footage:
 60,000 sq. ft. in Village Center plus 40,000 sq. ft. in SE corner of site. Restricted commercial square footage in the Approach Zone was assumed to be warehousing. Jobs for each were based on model factors developed for Tracy: 2 employees per 1000 sq ft of retail space; 3 employees per 1000 sq ft of office space, and 1 employee per 1000 sq ft of other space.
- PM peak hour trip rate and in/out split is based on vehicle counts conducted at the Roseville Aquatic Center in October, 2000. AM peak hour trips are based on communication with staff of the Roseville Aquatic Center in August, 2006. In/out split is based on vehicle counts conducted at the Morgan Hill Aquatic Center in August, 2006.
- Neighborhood Park trips are assumed to occur primarily outside of peak hours and to be mainly internal and largely walk and bike trips

4. Trip Distribution and Assignment

Internal trip distribution and distribution at the two Project driveways on Corral Hollow Road would change slightly due to the changes in land use locations along the east side of the Specific Plan (i.e. more retail and office uses would be located along Ellis Drive and less intense land uses off Summit Drive), compared to the approved Specific Plan. The driveway off Lammers road would also experience a very small change in traffic volumes.

5. Level of Service

A Level of Service (LOS) analysis was completed due to the change in land use designations and their locations along the east side of the Specific Plan. area, and subsequently a small change would occur in project trip generation and assignments.

The following study intersections would potentially be impacted.

1. Ellis Drive / Corral Hollow Road
2. Summit Drive / Corral Hollow Road
3. Ellis Drive / Lammers Road

Table 2 shows LOS results for Existing Plus Approved Project and Existing Plus Proposed Project.

Table 2: Existing Plus Project Level of Service Results

#	Intersection	Control Type	Existing Plus Approved Project Conditions						Existing Plus Proposed Amendment Conditions					
			AM Peak Hour			PM Peak Hour			AM Peak Hour			PM Peak Hour		
			Movement	Delay	LOS	Movement	Delay	LOS	Movement	Delay	LOS	Movement	Delay	LOS
1	Corral Hollow Rd / Driveway 1	Signal	Overall	31.1	C	Overall	17.1	B	Overall	32.1	C	Overall	18.6	B
2	Corral Hollow Rd / Driveway 2	Signal	Overall	18.3	B	Overall	16.0	B	Overall	20.3	C	Overall	21.5	C
3	Lammers Rd / Driveway 3	Signal	Overall	5.5	A	Overall	5.6	A	Overall	5.6	A	Overall	6.4	A

Notes:

1. Analysis performed using HCM 2010 methodologies.
2. Delay indicated in seconds/vehicle.
3. Overall level of service (LOS) standard is D.
4. Intersections that fall below City standard are highlighted and shown in **bold**.

Source: Kimley Horn and Associates, 2017.

The analysis indicates that the change in LOS does not substantially change the operating conditions at the intersections for existing plus project conditions. The City of Tracy’s LOS standard is LOS D and all study intersections/driveways will operate at LOS C or better. Therefore, the Proposed Amendment will not trigger a significant impact. Since the change in cumulative conditions would be smaller than the change in existing conditions, the cumulative conditions would also operate acceptably, with no significant impacts.