# INITIAL STUDY

FOR THE

# VALPICO GLENBRIAR APARTMENTS PARKING LOT EXPANSION PROJECT

SEPTEMBER 2022

*Prepared for:*

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

*Prepared by:*

De Novo Planning Group
1020 Suncast Lane, Suite 106
El Dorado Hills, CA 95762

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

A Land Use Planning, Design, and Environmental Firm

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# INITIAL STUDY CHECKLIST

## PROJECT TITLE

Valpico Glenbriar Apartments Parking Lot Expansion Project

## LEAD AGENCY NAME AND ADDRESS

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

## CONTACT PERSON AND PHONE NUMBER

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City of Tracy
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333 Civic Center Plaza
Tracy, CA 95376
Alan.Bell@cityoftracy.org
(209) 831-6426

## PROJECT SPONSOR'S NAME AND ADDRESS

Valpico Tracy Apartments LLC.
5780 Fleet Street
Carlsbad, Ca 92008

## PURPOSE OF THE INITIAL STUDY

An Initial Study (IS) is a preliminary analysis which is prepared to determine the relative environmental impacts associated with a proposed project. It is designed as a measuring mechanism to determine if a project will have a significant adverse effect on the environment, thereby triggering the need to prepare an Environmental Impact Report (EIR). It also functions as an evidentiary document containing information which supports conclusions that the project will not have a significant environmental impact or that the impacts can be mitigated to a "Less Than Significant" or "No Impact" level. If there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the lead agency shall prepare a Negative Declaration (ND). If the IS identifies potentially significant effects, but: (1) revisions in the project plans or proposals would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and (2) there is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment, then a Mitigated Negative Declaration (MND) shall be prepared.

This IS has been prepared consistent with California Environmental Quality Act (CEQA) Guidelines Section 15063, to determine if the proposed Tracy Valpico Apartments Parking Lot Expansion (Project) may have a significant effect upon the environment. Based upon the findings and mitigation measures contained within this report, a Negative Declaration will be prepared.

## PROJECT LOCATION AND SETTING

The Project site consists of approximately 13,440 square feet located at 2625 South Macarthur Drive in the City of Tracy, and the Valpico Glenbriar Apartments site at 351 E. Valpico Road. The Project site encompasses Assessor Parcel Numbers (APNs) 246-140-080 and 246-140-230. The Project's regional location is shown in Figure 1, and the Project vicinity is shown in Figure 2.

The project site is currently developed with a single-family residence on the parcel. Landscaping trees are located along the southern and northern edges of the project site. Lands to the north, east and south of the project site consist of single-family residential uses. There is a Rite Aid store located immediately southeast of the project site, along the project site's southern boundary. The Rite Aid store closed in 2021 and the building is unoccupied. The parcel immediately west of the project site is currently under construction to develop the 264-unit Valpico-Glenbriar Apartment Complex. Commercial, industrial, and vacant land uses are located further to the west of the project site. Single-family residential land uses are located further north and south of the project site.

## BACKGROUND AND RELATIONSHIP TO OTHER PROJECTS

In 2012, the City of Tracy received development applications for two adjacent apartment projects: the Valpico Apartments and the MacDonald Apartments.

An IS/MND was prepared to address construction-level and operational impacts of the Valpico Apartment project, which was approved concurrently with the adjacent MacDonald Apartments project by the Tracy City Council at the same public hearing on December 18, 2022.

While the Valpico project relied on the above-referenced IS/MND for CEQA clearance, the MacDonald Apartments project relied on a CEQA Guidelines Section 15183 exemption.

The previously approved Valpico project included plans to construct 184 apartments, while the previously approved MacDonald project proposed 60 apartment units. Together, these projects would consist of 244 multi-family housing units with associated parking and onsite residential amenities. The two project sites are adjacent to each other on approximately 11.62 total acres. The two projects were planned and designed to serve as a single development project with consistent design and shared amenities and utilities.

Subsequent revisions to the combined projects were approved by the City of Tracy in 2016, that slightly increased the total number of housing units from 244 to 252 multi-family housing units. However, no additional CEQA review was necessary because of the projects' similarity to the original approvals.

The 2012 IS/MND (Valpico) and the 15183 exemption (MacDonald) evaluated potential environmental effects associated with full development of each residential multi-family apartment project. The environmental analysis in the 2012 Valpico IS/MND addressed the following topics: aesthetics, agriculture and forestry resources, air quality, biological resources, cultural and tribal resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation/traffic, utilities and service systems, and mandatory findings of significance. All impacts in the IS/MND were mitigated to below a level of significance through the implementation of mitigation measures.

Following adoption of the 2012 IS/MND and the subsequent 2016 revisions, the Project Applicants for both the Valpico and MacDonald projects decided to combine their projects into a single cohesive multifamily residential development.

This combined project, which includes 264 residential units, a 6,500 square foot clubhouse amenity and onsite parking, a was analyzed under an Addendum to the 2012 IS/MND. The IS/MND Addendum was approved by the Tracy City Council on October 1, 2019.

The above-referenced residential project is currently under construction, and has been the subject of extensive review under CEQA.

The proposed project, which is the subject of the analysis in this Initial Study, is limited to a lot line adjustment, a General Plan Land Use Designation Amendment, and the construction of 25 parking spaces to serve the above-referenced residential project, as described in greater detail below. The project also includes the construction of a perimeter fence to enclose the apartment complex and new parking area, with vehicle and pedestrian gates at project entries. The fence construction is exempt from CEQA review in accordance with CEQA Guidelines Section 15303(e), new construction of small structures/accessory structures.

There are no "operational impacts" associated with the proposed parking lot project that have not already been analyzed under previous CEQA documents. The proposed parking lot would not increase the number of approved residential units in the adjacent Valpico-Glenbriar Apartments project, nor would it increase vehicle trips or other operational aspects of the previously-approved residential project. The proposed project would simply provide for additional parking spaces to serve the approved, and now under construction, residential project. As such, the analysis in this Initial Study focuses primarily on the potential construction-related impacts of the proposed parking lot.

## PROJECT DESCRIPTION

The project would include a lot line adjustment in order to acquire the westerly portion (56' x 240') of the property east of the Valpico Apartments complex in order to expand the parking lot for the apartments that are currently under construction.

This will result in approximately 25 additional standard parking spaces, in addition to relocating the maintenance building #13 (40'x22') over a portion of adjusted parcel. Existing utilities will be extended to the new building location. The fence and gates, mentioned in the section above, will also enclose the expanded parking area. The project site plan is shown on Figure 3.

## REQUESTED ENTITLEMENTS AND OTHER APPROVALS

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

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

- Adoption of the ND;
- Approval of a lot line adjustment;
- Approval of a rezone to amend the zoning district from Community Shopping Center to High Density Residential; and
- Approval of a General Plan Amendment to amend the land use designation of the eastern portion of the site from Commercial to Residential High.

- Approve Development Review Permit and related construction permits for the construction of the approximately 13,440 square foot parking lot expansion.

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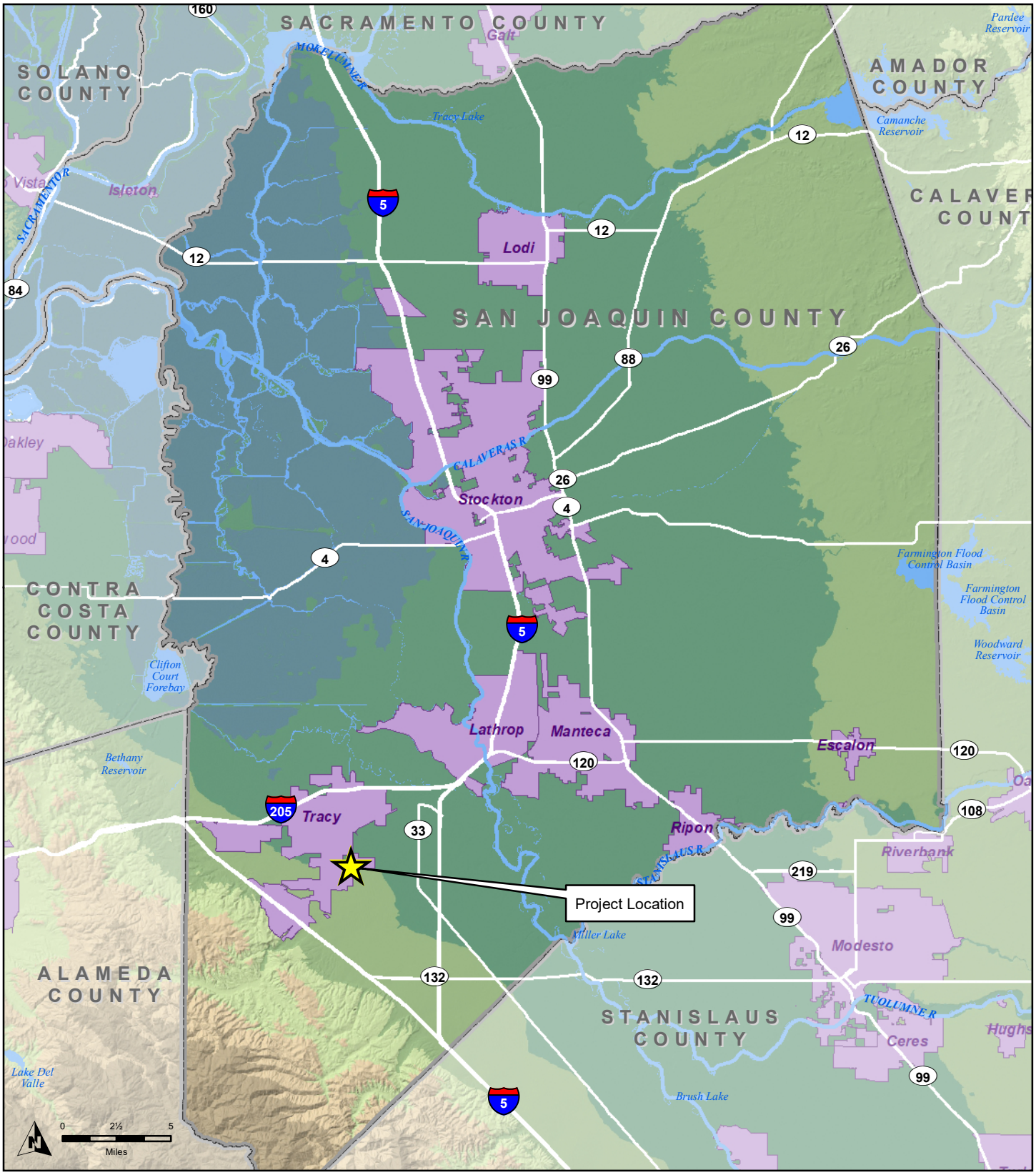


**LEGEND**

- Project Location
- Incorporated Area
- County Boundary

**CITY OF TRACY**
**VALPICO PARK LOT EXPANSION**
**LOT LINE ADJUSTMENT**

Figure 1. Regional Location Map

*Sources: California State Geoportal. Map date: July 14, 2022.*

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**LEGEND**

- Project Location
- Tracy City Limits
- School
- Park

**CITY OF TRACY**
**VALPICO PARK LOT EXPANSION**
**LOT LINE ADJUSTMENT**

Figure 2. Project Vicinity

*Sources: San Joaquin County GIS; ArcGIS Online World Imagery Map Service, 3/30/2021. Map date: July 14, 2022.*

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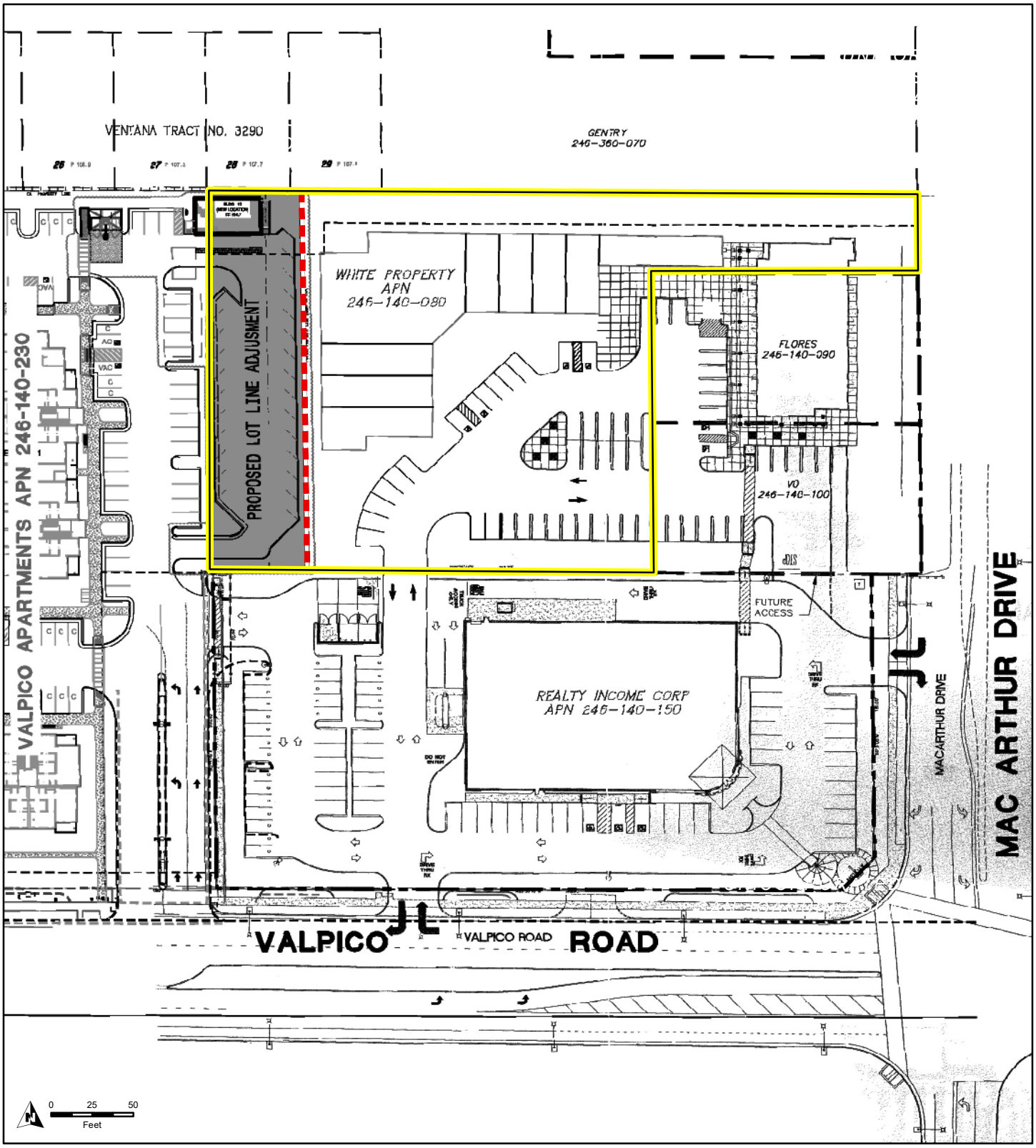


**LEGEND**

Existing Parcel Boundary

Proposed Lot Line Adjustment

**CITY OF TRACY**
**VALPICO PARK LOT EXPANSION**
**LOT LINE ADJUSTMENT**

Figure 3. Site Plan

*Sources: San Joaquin County GIS; MacKay & Somps, 2/11/2021. Map date: July 14, 2022.*

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# ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

# DETERMINATION

On the basis of this initial evaluation:

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

Signature Date

# EVALUATION INSTRUCTIONS

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

# EVALUATION OF ENVIRONMENTAL IMPACTS

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

- Potentially Significant Impact. This response is appropriate when there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant Impact" entries, upon completion of the Initial Study, an EIR is required.

- Less than Significant With Mitigation Incorporated. This response applies when the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact". The Lead Agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level.

- Less than Significant Impact. A less than significant impact is one which is deemed to have little or no adverse effect on the environment. Mitigation measures are, therefore, not necessary, although they may be recommended to further reduce a minor impact.

- No Impact. These issues were either identified as having no impact on the environment, or they are not relevant to the project.

# ENVIRONMENTAL CHECKLIST

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

## *I. AESTHETICS*

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

*Responses to Checklist Questions*

**Responses a) Less than Significant.** The City of Tracy is an urbanized area located within the southern section of San Joaquin County. There are no scenic vistas located on or adjacent to the project site. The proposed project is considered an infill project, and the proposed uses on the site are consistent and compatible with the surrounding land uses. Lands to the north and south of the project site consist of single-family residential uses. There is a Rite Aid store located immediately southeast of the project site, along the project site's eastern boundary. The parcel to the west is currently under construction in order to develop the Valpico Glenbriar Apartment complex.

Implementation of the proposed project would provide for additional parking in an area of the City that is largely developed. The project site is not topographically elevated from the surrounding lands, and is not highly visible from areas beyond the immediate vicinity of the site. There are no prominent features on the site, such as trees, rock outcroppings, or other visually distinctive features that contribute to the scenic quality of the site. The project site is not designated as a scenic vista by the City of Tracy General Plan. Implementation of the proposed project would not significantly change the existing visual character of the project area, as much of the areas immediately adjacent to the site are used for residential and commercial purposes.

Implementation of the proposed project would introduce paved parking development to the project area, and would be generally consistent with the surrounding residential and commercial development. Therefore, this impact is considered **less than significant**.

**Response b) No Impact.** As described in the Tracy General Plan EIR, there are two Officially Dedicated California Scenic Highway segments in the Tracy Planning Area, which extend a total length of 16 miles. The first designated scenic highway is the portion of I-580 between I-205 and I-5, which offers views of the Coast Range to the west and the Central Valley's urban and agricultural lands to the east. The second scenic highway is the portion of I-5 that starts at I-205 and continues south to Stanislaus County, which allows for views of the surrounding agricultural lands and the Delta-Mendota Canal and California Aqueduct. The project site is not visible from any of the above-referenced scenic highways. Development of the proposed project would not result in the removal of any trees, rock outcroppings, or buildings of historical significance, and would not result in changes to any of the viewsheds from the designated scenic highways in the vicinity of the City of Tracy. There is **no impact.**

**Response c) Less than Significant.** As described under Response a), above, the proposed project would add additional paved parking development to an area that currently contains numerous residential and commercial uses. The proposed project would be visually compatible with the surrounding land uses and would not significantly degrade the existing visual quality of the site or the surrounding area. Additionally, the project is subject to the City of Tracy's development and design review criteria, which would ensure that the parking area landscaping, streetscape improvements and exterior lighting improvements are compatible with the surrounding land uses. This is a **less than significant impact.**

**Response d) Less than Significant.** Daytime glare can occur when the sunlight strikes reflective surfaces such as windows, vehicle windshields and shiny reflective building materials. The proposed project would not introduce new residential structures. Reflective building materials are not proposed for use in the project, and as such, the project would not result in increases in daytime glare.

The project site contains no existing lighting. There is a potential for the proposed project to create new sources of light, but not glare. Examples of lighting would include construction lighting, landscape, and parking lighting. However, nighttime construction activities are not anticipated to be required as part of on-site construction. Operational light sources from street lighting may be required to provide for safe travel.

The City of Tracy Standard Plan #154 establishes minimum requirements for light illumination. Exterior lighting on new projects is also regulated by the Tracy Municipal Code, Off-Street Parking Requirements, Section 10.08.3530(h). The City addresses light and glare issues on a case-by-case basis during project approval and typically adds requirements as a condition of project approval to shield and protect against light spillover from one property to the next. The proposed project is subject to these regulations, which would ensure that this is a **less than significant impact.**

## *II. AGRICULTURE AND FORESTRY RESOURCES*

| *Would the project:* | *Potentially Significant Impact* | *Less Than Significant with Mitigation Incorporation* | *Less Than Significant Impact* | *No Impact* |
|---|---|---|---|---|
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | | | | X |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | | | | X |
| c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 1222(g)) or timberland (as defined in Public Resources Code section 4526)? | | | | X |
| d) Result in the loss of forest land or conversion of forest land to non-forest use? | | | | X |
| e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? | | | | X |

*Responses to Checklist Questions*

**Responses a) No Impact.** The project site consists of a small portion of the backyard of an existing single-family residential property. The project site is not designated as 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. The project site is surrounded by urban land uses, and there are no agricultural land uses or agricultural operations on or adjacent to the site. The project site is not irrigated for agricultural use, and the site is not viable for agricultural uses or activities. There is **no impact** related to this environmental topic, and no mitigation is required.

**Response b) No Impact.** The project site is not under a Williamson Act Contract, nor are any of the parcels immediately adjacent to the project site under a Williamson Act Contract. Therefore, implementation of the proposed project would not conflict with a Williamson Act Contract. The project site is currently zoned Community Shopping by the City's Zoning Map. As such, the proposed project would not conflict with any agricultural zoning or Williamson Act Contract. There is no impact.

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

**Response e) No Impact**. As described under Responses (a) and (b) above, the proposed project is not currently used for agricultural purposes, nor is it designated or zoned for agricultural uses. There are no agricultural lands or operations adjacent to the project site. There is **no impact** related to this environmental topic.

## III. AIR QUALITY

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

### *Existing Setting*

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

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

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

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

The SJVAPCD has also prepared the *2007 $PM_{10}$ Maintenance Plan and Request for Redesignation* (2007 $PM_{10}$ Plan). On April 24, 2006, the SJVAPCD submitted a Request for Determination of $PM_{10}$ Attainment for the Basin to the California Air Resources Board (CARB). CARB concurred with the request and submitted the request to the U.S. EPA on May 8, 2006. On October 30, 2006, the EPA issued a Final Rule determining that the Basin had attained the National Ambient Air Quality Standards (NAAQS) for $PM_{10}$. However, the EPA noted that the Final Rule did not constitute a

redesignation to attainment until all of the Federal Clean Air Act requirements under Section 107(d)(3) were met.

The SJVAPCD has prepared the *2008 PM.2.5 Plan* to achieve Federal and State standards for improved air quality in the San Joaquin Valley Air Basin. The *2008 PM.2.5 Plan* provides a comprehensive list of regulatory and incentive-based measures to reduce PM2.5.

In addition to the *2007 Ozone Plan, the 2008 $PM_{2.5}$ Plan,* and the *2007 $PM_{10}$ Plan*, the SJVAPCD prepared the *Guide for Assessing and Mitigating Air Quality Impacts* (GAMAQI). The GAMAQI is an advisory document that provides Lead Agencies, consultants, and project applicants with analysis guidance and uniform procedures for addressing air quality impacts in environmental documents. Local jurisdictions are not required to utilize the methodology outlined therein. This document describes the criteria that SJVAPCD uses when reviewing and commenting on the adequacy of environmental documents. It recommends thresholds for determining whether or not projects would have significant adverse environmental impacts, identifies methodologies for predicting project emissions and impacts, and identifies measures that can be used to avoid or reduce air quality impacts. An update of the GAMAQI was approved on March 19, 2015, and is used as a guidance document for this analysis.

The GAMAQI notes that, for CEQA purposes, a sensitive receptor is generically defined as a location where human populations, especially children, seniors, and sick persons are found, and there is reasonable expectation of continuous human exposure according to the averaging period for the Ambient Air Quality Standards (e.g., 24-hour, 8- hour, 1-hour). These typically include residences, hospitals, and schools. Locations of sensitive receptors may or may not correspond with the location of the maximum off-site concentration. The sensitive receptors in the vicinity of the project site include single-family residences located north, east, south, and west of the site.

*Responses to Checklist Questions*

**Responses a)-b) Less than Significant.** Air quality emissions would be generated during construction of the proposed project. However, unlike a typical development project, this proposed parking lot project does not have a traditional daily trip generation associated with project operations. Vehicle trips to and from the proposed parking lot would be limited exclusively to residents, and possibly visitors, to the Valpico Apartments project, located immediately adjacent to the project site. Operational air quality emissions associated with the Valpico Apartments projects have already been analyzed under CEQA. The proposed project would not generate any new or modified vehicle trips. The proposed project would simply provide for additional parking spaces for an already-approved project. As such, there are no air quality impacts associated with project operations. Further discussion of construction-related air quality impacts is provided below.

The SJVAPCD's approach to analysis of construction impacts is to require implementation of effective and comprehensive control measures, rather than to require detailed quantification of emission concentrations for modeling of direct impacts. $PM_{10}$ emitted during construction can vary greatly depending on the level of activity, the specific operations taking place, the equipment being operated, local soils, weather conditions, and other factors, making quantification difficult. Despite this variability in emissions, experience has shown that there are a number of feasible control measures that can be reasonably implemented to significantly reduce $PM_{10}$ emissions from construction activities. The SJVAPCD has determined that, on its own, compliance with Regulation VIII for all sites and implementation of all other control measures indicated in Tables 6-2 and 6-3 of the SJVAPCD's Guide for Assessing and Mitigating Air Quality Impacts (as

appropriate) would constitute sufficient mitigation to reduce construction $PM_{10}$ impacts to a level considered less than significant.

Construction would result in numerous activities that would generate dust. The fine, silty soils in the project area and often strong afternoon winds exacerbate the potential for dust, particularly in the summer months. Impacts would be localized and variable. Construction impacts would last for a period of a few weeks to a few months. The initial phase of project construction would involve grading and site preparation activities, followed by paving. Construction activities that could generate dust and vehicle emissions are primarily related to grading, soil excavation, and other ground-preparation activities.

Control measures are required and enforced by the SJVAPCD under Regulation VIII. The SJVAPCD considers construction-related emissions from all projects in this region to be mitigated to a less than significant level if SJVAPCD-recommended $PM_{10}$ fugitive dust rules and equipment exhaust emissions controls are implemented. The proposed project would be required to comply with all applicable measures from SJVAPCD Rule VIII. Therefore, the proposed project would have a ***less than significant*** impact related to the potential to conflict with or obstruct implementation of the applicable air quality plan, or to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

**Response c):** Sensitive receptors are those parts of the population that can be severely impacted by air pollution. Sensitive receptors include children, the elderly, and the infirm. The closest sensitive receptor is the Tom Hawkins Elementary School located approximately 0.5 miles south of the project site. As noted above, the only new emissions that would be generated by the proposed project would be short-term, temporary emissions associated with site grading and paving during the construction phase. The project would not increase vehicle travel, vehicle trips, or vehicle miles travelled.

The construction phase of the project would be temporary and short-term, and the implementation of all State, Federal, and SJVAPCD requirements would greatly reduce pollution concentrations generated during construction activities. The SJVAPCD considers construction-related emissions from all projects in this region to be mitigated to a less than significant level if SJVAPCD-recommended $PM_{10}$ fugitive dust rules and equipment exhaust emissions controls are implemented. The proposed project would be required to comply with all applicable measures from SJVAPCD Rule VIII. Therefore, dust from construction of the proposed project would be reduced and would be consistent with SJVAPCD guidance on this topic.

Therefore, implementation of the proposed project would not expose these sensitive receptors to substantial pollutant concentrations. The proposed project would not generate significant concentrations of air emissions. Therefore, impacts to sensitive receptors would be negligible and this is a ***less than significant*** impact.

**Response d)** The proposed project would not generate objectionable odors that would adversely affect substantial numbers of people. People in the immediate vicinity of construction activities may be subject to temporary odors typically associated with construction activities (diesel exhaust, hot asphalt, etc.). However, any odors generated by construction activities would be minor and would be short and temporary in duration. Additionally, as previously described under Response c), the proposed project is not anticipated to increase operational air emissions on this community, since average daily traffic (ADT) is not anticipated to increase along the nearest roadways due to implementation of the proposed project.

Examples of facilities that are known producers of operational odors include: Wastewater Treatment Facilities, Chemical Manufacturing, Sanitary Landfill, Fiberglass Manufacturing, Transfer Station, Painting/Coating Operations (e.g. auto body shops), Composting Facility, Food Processing Facility, Petroleum Refinery, Feed Lot/Dairy, Asphalt Batch Plant, and Rendering Plant. If a project would locate receptors and known odor sources in proximity to each other further analysis may be warranted; however, if a project would not locate receptors and known odor sources in proximity to each other, then further analysis is not warranted.

The project does not include any of the aforementioned uses. Additionally, construction activities would be temporary and minor, and average daily traffic along the roadways nearest to the neighboring residential communities not increase compared to the existing condition. As such, implementation of the proposed project would have a ***less than significant*** impact relative to this topic.

## *IV. BIOLOGICAL RESOURCES*

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

*Responses to Checklist Questions*

**Responses a) Less than Significant.** No special-status species are expected to be affected by the proposed project. The project involves the expansion of the parking area of the Valpico Glenbriar Apartments currently under construction, immediately adjacent to the west of the project site, within a highly urbanized area of the City of Tracy.

The site consists of a small portion of the fenced-in area of a residential backyard. The site has been highly disturbed and is void of native vegetation and natural habitat. The site is not suitable to support any protected or special-status species. Therefore, this is a ***less than significant*** impact.

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

**Responses c) No Impact.** A wetland is an area that is inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal

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

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

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

There are no wetlands located on the project site. Therefore, there is ***no impact*** and no mitigation is required.

**Responses d) Less than Significant.** The California Natural Diversity Data Base (CNDDB) record search did not reveal any documented wildlife corridors or wildlife nursery sites on or adjacent to the project site. Furthermore, the field survey did not reveal any wildlife corridors or wildlife nursery sites on or adjacent to the project site. Implementation of the proposed project would have a ***less than significant***. No mitigation is necessary.

**Responses e), f) Less than Significant.** The proposed project is classified as Urban Habitat under the SJMSCP. The City of Tracy and the project applicant have consulted with SJCOG and agreed to allow coverage of the project pursuant to the SJMSCP. SJCOG staff has determined that the proposed project is consistent with the SJMSCP and coverage under the plan has been obtained. Therefore, this is a ***less than significant*** impact and no additional mitigation is required.

## *V. CULTURAL RESOURCES*

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

*Responses to Checklist Questions*

**Response a) - c): Less than Significant.** A review of literature maintained by the Central California Information Center of the California Historical Resources Information System at California State University, Stanislaus identified that no previously identified prehistoric period cultural resources are known within, or within a 0.25-mile radius of the project site. Additionally, there are no known unique paleontological or archeological resources known to occur on, or within the immediate vicinity of the project site. Therefore, it is not anticipated that site grading and preparation activities would result in impacts to cultural, historical, archaeological or paleontological resources. There are no known human remains located on the project site, nor is there evidence to suggest that human remains may be present on the project site. Additionally, there are no known unique paleontological or archeological resources known to occur on, or within the immediate vicinity of the project site.

Furthermore, the location of the project site indicates that it and the surrounding area have been previously excavated. The project site is currently developed with a single-family residence and surrounded by existing or future urban development. No cultural, historical, or archaeological resources are anticipated to be encountered during the project's construction phase due to the disturbed nature of the site and the limited amount of excavation that would be required to implement the project. Therefore, project implementation would have a ***less than significant*** impact relative to this topic

## *VI. ENERGY*

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

*Responses to Checklist Questions*

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

The proposed project consists of a lot line adjustment in order to expand the parking area for the Valpico apartment site that is currently under construction. The proposed project will result in approximately 25 additional standard parking spaces, in addition to the development of a maintenance building. Existing utilities will be extended to the new building location. The amount of operational energy used at the project site would directly correlate to the amount of outdoor lighting and landscape equipment. Operational energy would be negligible as the project does not propose uses that would increase energy use, trip generation, or VMT's. Overall, proposed project energy consumption would be temporary and minor, given the nature of the proposed project (a parking lot extension with installation of a maintenance building), and given the size and scope of proposed project activities.

The proposed project would comply with all existing energy standards, including those established by the City of Tracy and San Joaquin County, and would not result in significant adverse impacts on energy resources. Therefore, the proposed project would not be expected cause an inefficient, wasteful, or unnecessary use of energy resources nor cause a significant impact on any of the threshold as described by Appendix G of the CEQA Guidelines. This is a **less than significant** impact.

## *VII. GEOLOGY AND SOILS*

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

*Responses to Checklist Questions*

**Responses a.i)-a.ii) Less than Significant.** The project site is located in an area of low to moderate seismicity. No known active faults cross the project site, and the site is not located within an Alquist-Priolo Earthquake Fault Zone; however, relatively large earthquakes have historically occurred in the Bay Area and along the margins of the Central Valley. Many earthquakes of low magnitude occur every year in California. The nearest earthquake fault zoned as active by the State of California Geological Survey is the Black Butte fault, located approximately 2.7 miles southwest of the site.

The Tracy area has a low-to-moderate seismic history. The largest recorded measurable magnitude earthquake in Tracy measured 3.9 on the Richter scale. The greatest potential for significant ground shaking in Tracy is believed to be from maximum credible earthquakes occurring on the Calaveras, Hayward, San Andreas, or Greenville faults. Further seismic activity can be expected to continue along the western margin of the Central Valley, and as with all projects in the area, the Project will be designed to accommodate strong earthquake ground shaking, in compliance with the applicable California building code standards.

Other faults capable of producing ground shaking at the site include the San Joaquin fault, 6.7 miles southwest; the Midway fault, 6.9 miles southwest; and the Corral Hollow-Carnegie fault, 10.7 miles southwest of the site. Any one of these faults could generate an earthquake capable of causing strong ground shaking at the subject site. Earthquakes of Moment Magnitude (Mw) 7 and larger have historically occurred in the region and numerous small magnitude earthquakes occur every year.

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

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

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

Implementation of the California Building Code standards, which include provisions for seismic building designs, would ensure that impacts associated with groundshaking would be less than significant. Building new structures for human use would increase the number of people exposed to local and regional seismic hazards. Seismic hazards are a significant risk for most property in California.

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

> **SA-1.1, Policy P2:** Geotechnical reports shall be required for development in areas where potentially serious geologic risks exist. These reports should address the degree of hazard, design parameters for the project based on the hazard, and appropriate mitigation measures.
>
> **SA-1.2, Policy P1:** All construction in Tracy shall conform to the California Building Code and the Tracy Municipal Code including provisions addressing unreinforced masonry buildings.

The City reviews all proposed projects for consistency with the General Plan policies and California Building Code provisions identified above, as applicable. This review occurs throughout the project application review and processing stage, and throughout plan check and building inspection phases prior to the issuance of a certificate of occupancy. Since the majority of work under the scope of this project involves roadway and bridges, the relevant Caltrans, state, and FHWA codes and requirements will be enforced.

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

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

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

Soil expansion is dependent on many factors. The more clayey, critically expansive surface soil and fill materials will be subjected to volume changes during seasonal fluctuations in moisture content. According to the City of Tracy General Plan Draft EIR, portions of the Tracy Planning Area have a moderate to high risk for expansive soils. The General Plan EIR indicates that with the implementation of objectives, policies, and actions from the General Plan Safety Element, this potentially significant impact would be reduced to a ***less than significant*** level. It is further noted that the project would not introduce new people or habitable structures to the site. There would be no risk related to this topic associated with the construction of a parking lot and maintenance shed.

**Responses a.iv):** The project site is relatively flat. According to the City's General Plan EIR, the landslide risk in Tracy is low in most areas. In the wider Tracy Planning Area, some limited potential for risk exists for grading and construction activities in the foothills and mountain terrain of the upland areas in the southwest. The potential for small scale slope failures along river banks also exists. The project site is not located in the foothills, mountain terrain, or along a river bank. As such, the project site is exposed to little or no risk associated with landslides. This is a ***less than significant*** impact and no mitigation is required.

**Responses b):** According to the project site plans prepared for the proposed project, development of the proposed project would result in the creation of new impervious surface areas in portions of the project site. The development of the project site would also cause ground disturbance of top soil. The ground disturbance would be limited to the areas proposed for grading and excavation. During any construction and land preparation processes within the Project site, exposed surfaces could be susceptible to erosion from wind and water. Effects from

erosion include impacts on water quality and air quality. Exposed soils that are not properly contained or capped increase the potential for increased airborne dust and increased discharge of sediment and other pollutants into nearby stormwater drainage facilities. Risks associated with erosive surface soils can be reduced by using appropriate controls during construction and properly re-vegetating exposed areas. The implementation of various dust control measures during site preparation and construction activities would reduce the potential for soil erosion and the loss of topsoil. Additionally, once the grading activities are completed, the site would immediately be paved, which would cap any exposed soil and eliminate the potential for erosion. Therefore, the impact is ***less than significant***.

**Response e):** The proposed project would not require the use of septic tanks or alternative waste water disposal systems for the disposal of waste water. Implementation of the proposed project would result in ***no impact*** relative to this topic.

**Response f):** Known paleontological resources or sites are not located on the project site. Additionally, unique geologic features are not located on the site. The site is currently developed with a single-family residence and surrounded by existing or future urban development. No paleontological resources or geologic features are anticipated to be encountered during the project's construction phase due to the disturbed nature of the site and the limited amount of excavation that would be required to implement the project. Therefore, ***no impact*** would occur.

## *VIII. GREENHOUSE GAS EMISSIONS*

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

*Responses to Checklist Questions*

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

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

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

The emissions from a single project will not cause global climate change, however, GHG emissions from multiple projects throughout the world could result in a cumulative impact with respect to global climate change. Therefore, the analysis of GHGs and climate change presented in this section is presented in terms of the proposed project's contribution to cumulative impacts and potential to result in cumulatively considerable impacts related to GHGs and climate change.

Cumulative impacts are the collective impacts of one or more past, present, and future projects that, when combined, result in adverse changes to the environment. In determining the significance of a proposed project's contribution to anticipated adverse future conditions, a lead agency should generally undertake a two-step analysis. The first question is whether the *combined* effects from *both* the proposed project *and* other projects would be cumulatively significant. If the agency answers this inquiry in the affirmative, the second question is whether "the proposed project's *incremental* effects are cumulatively considerable" and thus significant in and of themselves. The cumulative project list for this issue (climate change) comprises anthropogenic (i.e., human-made) GHG emissions sources across the globe and no project alone would reasonably be expected to contribute to a noticeable incremental change to the global

climate. However, legislation and executive orders on the subject of climate change in California have established a statewide context and process for developing an enforceable statewide cap on GHG emissions. Given the nature of environmental consequences from GHGs and global climate change, CEQA requires that lead agencies consider evaluating the cumulative impacts of GHGs. Small contributions to this cumulative impact (from which significant effects are occurring and are expected to worsen over time) may be potentially considerable and, therefore, significant.

*Significance Thresholds*

Governor's Office of Planning and Research's (OPR's) Guidance does not include a quantitative threshold of significance to use for assessing a project's GHG emissions under CEQA. Moreover, the California Air Resources Board (CARB) has not established such a threshold or recommended a method for setting a threshold for project-level analysis. In the absence of a consistent statewide threshold, a threshold of significance for analyzing the project's GHG emissions was developed. The issue of setting a GHG threshold is complex and dynamic, especially in light of the California Supreme Court decision in *Center for Biological Diversity v. California Department of Fish and Wildlife* (referred to as the Newhall Ranch decision hereafter). The California Supreme Court ruling also highlighted the need for the threshold to be tailored to the specific project type, its location, and the surrounding setting. Therefore, the threshold used to analyze the project is specific to the analysis herein and the City retains the ability to develop and/or use different thresholds of significance for other projects in its capacity as lead agency and recognizing the need for the individual threshold to be tailored and specific to individual projects.

The SJVAPCD provides guidance for addressing GHG emissions under CEQA. The SJVAPCD requires quantification of GHG emissions for all projects which the lead agency has determined that an EIR is required. Although an EIR is not required for the proposed project, the GHG emissions are quantified below, followed by a consistency analysis with the SJCOG RTP/SCS.

*Responses to Checklist Questions*

**Responses a) and b):**

Emissions of GHGs contributing to global climate change are attributable in large part to human activities associated with the industrial/manufacturing, utility, transportation, residential, and agricultural sectors. Therefore, the cumulative global emissions of GHGs contributing to global climate change can be attributed to every nation, region, and city, and virtually every individual on Earth. A project's GHG emissions are at a micro-scale relative to global emissions, but could result in a cumulatively considerable incremental contribution to a significant cumulative macro-scale impact. Implementation of the proposed project would contribute to increases of GHG emissions that are associated with global climate change. Estimated GHG emissions attributable to future development would be primarily associated with increases of CO2 and other GHG pollutants, such as CH4 and N2O, from construction. These construction GHG emissions are a one-time release and are comparatively much lower than emissions associated with operational phases of a project. Cumulatively, these construction emissions would not generate a significant contribution to global climate change.

As noted previously, the proposed parking lot expansion would not result in operational emissions, given that the project would not increase vehicle trips or vehicle miles travelled. The only GHG emissions that would be emitted by the proposed project would occur during the relatively short construction phase. These emissions would be negligible, and would not contribute to global climate change. This is a less than significant impact.

## *IX. HAZARDS AND HAZARDOUS MATERIALS*

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

*Responses to Checklist Questions*

**Responses a)-c) No Impact.** The proposed project would not involve the use of any hazardous materials. There would be no hazardous materials used, stored or transported as a result of project implementation. The project is a residential parking lot. There is **no impact**.

**Response d) No Impact.** The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, project implementation would have **no impact** relative to this topic.

**Response e) No Impact.** The Federal Aviation Administration (FAA) establishes distances of ground clearance for take-off and landing safety based on such items as the type of aircraft using the airport.

The Tracy Municipal Airport is the closest airport to the project site, located approximately 1.5 miles southwest of the site. The Airport is a general aviation airport owned by the City and managed by the Mobility and Housing Division of the City Manager's Office. The City of Tracy

adopted an Airport Master Plan in 1998, analyzing the impacts to safety on surrounding development from the Tracy Municipal Airport.

The probability of an aircraft accident is highest along the extended runway centerline, and within one mile of the runway end. The Airport Master Plan designates four safety zones in which land use restrictions apply due to proximity to the airport:

1. Runway Protection Zone (RPZ)
2. Inner Approach Zone (PAZ0
3. Outer Approach Zone (OAZ)
4. Overflight Zone (OZ)

Land use constraints in these four zones become progressively less restrictive from the RPZ to the OZ. The proposed project is not located in any of these four safety zones. The proposed project is not within the Tracy Airport zone, nor is it within any area identified as impacted by the Tracy Municipal Airport in the San Joaquin County Airport Land Use Compatibility Plan (i.e. it is not within the Airport Influence Area). Therefore, ***no impact*** associated with private airstrips and airport land use plans would occur.

**Response f) No Impact.** The project site currently connects to an existing network of City streets. The proposed parking area expansion would allow for greater emergency access relative to existing conditions. The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, there is **no impact** relative to this topic.

**Response g) Less than Significant.** The risk of wildfire is related to a variety of parameters, including fuel loading (vegetation), fire weather (winds, temperatures, humidity levels and fuel moisture contents) and topography (degree of slope). Steep slopes contribute to fire hazard by intensifying the effects of wind and making fire suppression difficult. Fuels such as grass are highly flammable because they have a high surface area to mass ratio and require less heat to reach the ignition point. The project would not result in development of structures or housing which would subject residents, visitors, or workers to long-term wildfire danger. Therefore, impacts from project implementation would be considered ***less than significant*** relative to this topic.

## *X. HYDROLOGY AND WATER QUALITY*

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

*Responses to Checklist Questions*

**Responses a), c(i) – c(iv)) Less thang Significant.** The proposed project does not contain any drainage connectivity to Waters of the US, nor is it located within a flood plain or flood hazard zone. The proposed project would not generate wastewater which would require treatment. The proposed project will not result in intensification of land uses, or the addition of structures or uses that would differ from the current General Plan and the previously-approved Valpico Glenbriar Apartments project.

In order to ensure that stormwater runoff from the project site does not adversely increase pollutant levels in adjacent surface waters, or exceed the capacity of the City's nearby stormwater conveyance infrastructure, the project is required to adhere to the standards and requirements contained in Chapter 11.34 of the Tracy Municipal Code – Stormwater Management and Discharge Control. A technical memo addressing the proposed project's stormwater design requirements was prepared (MacKay & Somps Civil Engineers, Inc., March 16, 2022). As noted in the technical memo, the stormwater infiltration trench facilities for the adjacent Valpico

Glenbriar Apartments project were sized for the 100-year, 24-hour storm event based on the City of Tracy's criteria for volume-based stormwater quality treatment. Relative to overall development of the adjacent apartment project, this additional proposed parking area adds less than 3% new impervious surface area of the previously-approved project. The addition of the proposed parking area increases the design surface water elevation in the infiltration trench by only 0.2', which is a negligible increase. This minor increase in water surface elevation meets the water quality requirements for the City of Tracy with no additional infrastructure, and is already included in Operation and Maintenance agreements between the developer and the City. On July 20, Wood Rogers, hired by the City, published a Technical Memorandum to evaluate the apartments' storm drainage system's capacity to accommodate the expanded parking area. Wood Rogers evaluated the storm drainage system's design and concluded that the expanded parking area would increase the risk of overland release, as designed, onto the adjacent parcel; and the potential hazard associated with this overland release is negligible.

Implementation of the proposed project would result in a ***less than significant*** impact relative to this topic.

**Responses b) and e) Less thang Significant.** The proposed project would not require ground water supplies, and would not interfere with groundwater recharge. The project area is not located within a key groundwater recharge area, and would introduce a negligible increase in impervious surfaces. As such, impacts from project implementation would be ***less than significant*** relative to this topic.

**Response d) No Impact.** The project site is not within a 100-year or 200-year flood zone as delineated by FEMA. The project site is not within a tsunami or seiche zine. Development of the proposed project would not place housing or structures in a flood hazard area. Therefore, ***no impact*** from project implementation relative to flood hazard, tsunami, or seiche zones would occur.

## *XI. LAND USE AND PLANNING*

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

*Responses to Checklist Questions*

**Response a) No Impact.** The project site would result in the expansion of the parking area for the Valpico Glenbriar Apartments, located immediately west of the project site. Development of the project would not result in any physical barriers, such as a wall, or other division, that would divide an existing community, but would serve as an orderly extension of a planned parking area. The project would have ***no impact*** in regards to the physical division of an established community.

**Response b) Less than Significant.** The key planning documents that are directly related to, or that establish a framework within which the proposed project must be consistent, include:

- City of Tracy General Plan; and
- City of Tracy Zoning Ordinance.

The project site is currently designated Commercial by the City of Tracy General Plan Land Use Map and is zoned Community Shopping Center (CS). The project applicant is requesting a Rezone to amend the existing zoning designation for a portion of APN 246-140-080 from CS to High Density Residential (HDR). In addition, the project applicant is requesting a General Plan Amendment to change the current designation from "Commercial" to "Residential High" for a portion of APN 246-140-080. The proposed parking area is consistent with the “Residential High” designation.

The proposed Project would not conflict with any goals, policies, or implementing actions contained within the General Plan or other regulations adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, impacts to land use compatibility would be ***less than significant***

## *XII. MINERAL RESOURCES*

| *Would the project:* | *Potentially Significant Impact* | *Less Than Significant with Mitigation Incorporation* | *Less Than Significant Impact* | *No Impact* |
|---|---|---|---|---|
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | | | | X |
| b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | | | | X |

*Responses to Checklist Questions*

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

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

Figure 4.8-1 of the General Plan EIR identifies Mineral Resource Zones (MRZs) throughout the Tracy Planning Area. The project site is located within an area designated as MRZ-3. The MRZ-3 designation applies to areas containing mineral deposits the significance of which cannot be evaluated from available data. There are no substantial aggregate materials located within the project site. Therefore, the project would not result in the loss of availability of a known mineral resource or locally-important mineral resources recovery site. Therefore, there is ***no impact*** related to mineral resources.

## *XIII. NOISE*

| *Would the project result in:* | *Potentially Significant Impact* | *Less Than Significant with Mitigation Incorporation* | *Less Than Significant Impact* | *No Impact* |
|---|---|---|---|---|
| a) Generation of a temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | | | X | |
| b) Generation of excessive groundborne vibration or groundborne noise levels? | | | X | |
| c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | | | X | |

*Responses to Checklist Questions*

**Responses a) Less than Significant.** The proposed project is located in an area consisting predominately of residential land uses, with some limited commercial uses nearby as well. The primary sources of noise currently present in the project area are from vehicle traffic along MacArthur Drive and Valpico Road.

Operation of the proposed parking lot would not result in an increase in traffic on area roadways. Traffic noise associated with the adjacent Valpico Apartments project would not increase as a result of approval and operation of the proposed project. Additionally, the proposed project not not introduce new sensitive receptors to the area.

Construction activities have the potential to create temporary, or periodic increases in ambient noise levels in the project vicinity above levels existing without the project. During the construction stage of the project, noise from construction activities would add to the noise environment in the project vicinity. Construction activities would include the use of heavy equipment including grading and compacting that can generate noise. Noise would also be generated during the construction phase by increased truck traffic on area roadways. This noise increase would be of short duration and would occur primarily during daytime hours.

Table 1 provides a list of the types of equipment which may be associated with construction activities and the associated noise levels. The nearest residential receptors would be located roughly 27 feet or further from construction activities.

***Table 1: Construction Equipment Noise***

| Type of Equipment | Predicted Noise Level ($L_{max}$ Db) | | | | Distances To Noise Contours (Feet) | |
|---|---|---|---|---|---|---|
| | Noise Level At 50' | Noise Level At 100' | Noise Level At 50' | Noise Level At 100' | Noise Level At 50' | Noise Level At 100' |
| Backhoe | 78 | 72 | 66 | 60 | 126 | 223 |
| Compactor | 83 | 77 | 71 | 65 | 223 | 397 |
| Compressor (air) | 78 | 72 | 66 | 60 | 126 | 223 |
| Dozer | 82 | 76 | 70 | 64 | 199 | 354 |
| Dump Truck | 76 | 70 | 64 | 58 | 100 | 177 |
| Excavator | 81 | 75 | 69 | 63 | 177 | 315 |
| Generator | 81 | 75 | 69 | 63 | 177 | 315 |

*SOURCE: ROADWAY CONSTRUCTION NOISE MODEL USER'S GUIDE. FEDERAL HIGHWAY ADMINISTRATION. FHWA-HEP-05-054. JANUARY 2006.*

Noise sensitive receptors near the construction site would, at times, experience elevated noise levels from construction activities; however, construction-related noise generally would occur during daytime hours only. General Plan Noise Element Policy 4 (Goal N-1.2) establishes the following construction requirements:

> *All construction in the vicinity of noise sensitive land uses, such as residences, hospitals, or convalescent homes, shall be limited to daylight hours or 7:00 a.m. to 7:00 p.m. In addition, the following construction noise control measures shall be included as requirements at construction sites to minimize construction noise impacts:*
>
> - *Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.*
> - *Locate stationary noise-generating equipment as far as possible from sensitive receptors when sensitive receptors adjoin or are near a construction area.*
> - *Utilize "quiet" air compressors and other stationary noise sources where technology exists.*

Implementation of these required measures (i.e., engine muffling, placement of construction equipment, and strategic stockpiling and staging of construction vehicles), and compliance with the City Municipal Code requirements, would serve to further reduce exposure to construction noise levels. Adherence to City's General Plan, as well as City Municipal Code Title 4.12, Article 9 (Noise Control Ordinance), would minimize any impacts from noise during construction. Requirements stated above are adopted by the City as Conditions of Approval (COAs) for all new projects prior to project approval

Therefore, implementation of the proposed project would have a ***less than significant*** impact relative to this topic.

**Responses b) Less than Significant.** No major stationary sources of groundborne vibration were identified in the project area that would result in the long-term exposure of proposed onsite land uses to unacceptable levels of ground vibration. In addition, the proposed project would not involve the use of any major equipment or processes that would result in potentially significant levels of ground vibration that would exceed these standards at nearby existing land uses. However, construction activities associated with the proposed project would require the use of

various tractors, trucks, and potentially jackhammers that could result in intermittent increases in groundborne vibration levels. The use of major groundborne vibration-generating construction equipment/processes (i.e., blasting, pile driving) is not anticipated to be required for construction of the proposed project.

Groundborne vibration levels commonly associated with construction equipment are summarized in Table 2.

***Table 2: Representative Vibration Source Levels for Construction Equipment***

| *EQUIPMENT* | *PEAK PARTICLE VELOCITY AT 25 FEET (IN/SEC)* |
|---|---|
| Large Bulldozers | 0.089 |
| Loaded Trucks | 0.076 |
| Jackhammer | 0.035 |
| Small Bulldozers | 0.003 |

*SOURCE: FTA 2006, CALTRANS 2004.*

Based on the levels presented in Table 2, groundborne vibration generated by construction equipment would not be anticipated to exceed approximately 0.09 inches per second ppv at 25 feet. Predicted vibration levels would not be anticipated to exceed recommended criteria for structural damage and human annoyance (0.2 and 0.1 in/sec ppv, respectively) at nearby land uses. As a result, short-term groundborne vibration impacts would be considered ***less than significant*** and no mitigation is required.

**Response c) Less than Significant.** The Tracy Municipal Airport is the closest airport to the project site, located approximately 1.5 miles southwest of the site. The Airport is a general aviation airport owned by the City and managed by the Mobility and Housing Division of the City Manager's Office. The City of Tracy adopted an Airport Master Plan in 1998, analyzing the impacts to safety on surrounding development from the Tracy Municipal Airport.

The San Joaquin County Airport Land Use Plan establishes noise contours surrounding the Tracy Municipal Airport. As shown on Figure 4.14-3 of the Tracy General Plan Final Supplemental EIR (Certified on February 1, 2011), the project site is located outside of both the 65 dBCNEL and the 60 dBCNEL noise contours for the Tracy Municipal Airport. As such, the project site would not be exposed to excessive noise from the Tracy Municipal Airport. This is a ***less than significant*** impact, and no mitigation is required.

## *XIV. POPULATION AND HOUSING*

| ***Would the project:*** | ***Potentially Significant Impact*** | ***Less Than Significant with Mitigation Incorporation*** | ***Less Than Significant Impact*** | ***No Impact*** |
|---|---|---|---|---|
| a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | | | X | |
| b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? | | | | X |

*Responses to Checklist Questions*

**Response a) Less than Significant.** The project does not propose any housing that would result in direct population growth. The proposed project will not result in intensification of land uses, or the addition of structures or uses that would differ from the current General Plan. The project will expand the parking area for the Valpico Glenbriar Apartments. No population increases would result from implementation of the proposed project. Therefore, implementation of the proposed project would have a ***less than significant*** impact relative to this topic.

**Response b) No Impact.** The project site is located within the Tracy City limit. The proposed project would not displace housing or people. Implementation of the proposed project would have ***no impact*** relative to this topic.

## *XV. PUBLIC SERVICES*

| | *Potentially Significant Impact* | *Less Than Significant with Mitigation Incorporation* | *Less Than Significant Impact* | *No Impact* |
|---|---|---|---|---|
| a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: | | | | |
| i) Fire protection? | | | | X |
| ii) Police protection? | | | | X |
| iii) Schools? | | | | X |
| iv) Parks? | | | | X |
| v) Other public facilities? | | | | X |

*Responses to Checklist Questions*

**Responses ai), aii), aiii), aiv):** The project site is currently under the jurisdiction of the South San Joaquin County Fire Authority. The proposed project would not include additional residential units, or people to the City of Tracy. The proposed project will not result in intensification of land use, or the addition of structures or uses that would differ from the current General Plan or previously-approved projects. No additional demand for fire protection would be created by the project. Therefore, implementation of the proposed project will have ***no impact*** to this topic.

The project site is currently under the jurisdiction of the Tracy Police Department. The proposed project would not include additional residential units, or add people to the City of Tracy. The proposed project would not result in intensification of land use, or the addition of structures or uses that would differ from the current General Plan or previously-approved projects. No additional demand for police protection would be created by the project. Therefore, implementation of the proposed project will have ***no impact*** relative to this topic.

Schools within the City of Tracy are part of the Tracy Unified School District. The proposed project does not include any residential units, or any other type of use that would directly, or indirectly increase the student population in the area. Therefore, implementation of the proposed project will have ***no impact*** relative to this topic.

The proposed project does not include any residential units or any other type of use that would directly, or indirectly increase the population, or park demand in the area, or include any other type of use that would directly increase the park needs. The proposed project will not result in intensification of land use, or the addition of structures or uses that would differ from the current General Plan. Therefore, the proposed project would not have the potential to require construction of additional park and recreational facilities which may cause substantial adverse physical environmental impacts. Therefore, implementation of the proposed project will have ***no impact*** relative to this topic.

## *XVI. RECREATION*

| | *Potentially Significant Impact* | *Less Than Significant with Mitigation Incorporation* | *Less Than Significant Impact* | *No Impact* |
|---|---|---|---|---|
| a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | | | | X |
| b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? | | | | X |

*Responses to Checklist Questions*

**Response a)-b) No Impact.** The proposed project does not include any residential units or any other type of use that would increase the population, or park and recreation facility demand in the area, or include any other type of use that would directly increase the use of park and recreation facilities. The proposed project will not result in intensification of land uses, or the addition of structures or uses that would differ from the current General Plan. Therefore, the proposed project would not significantly increase the use of existing facilities. Furthermore, it is not anticipated that any substantial physical deterioration of existing facilities would occur, or be accelerated. Implementation of the proposed project would have a **no impact** relative to this topic.

## *XVII. TRANSPORTATION*

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

*Responses to Checklist Questions*

**Response a) No Impact.** No new residential structures, uses, or visitor serving areas are included in the project. Therefore, the project is not expected to result in any increase in vehicle trips within the area. The project would not result in any changes to roadway configurations or driveway access points for the approved Valpico Glenbriar Apartments Project, nor would the project conflict with any adopted plans or programs, nor would it interfere with any transit, roadway, bicycle or pedestrian facilities. The temporary gates restricting access to the future Glenbriar Drive through the project site will be removed and all improvements consistent with City standards prior to acceptance of Glenbriar Drive as a public right-of-way. There is **no impact** relative to this topic.

**Response b) No Impact**. The proposed project would not add any new vehicle trips to any area roadways, nor would it increase the length of any existing or future vehicle trips. No change in VMT would occur as a result of project implementation. The project would simply add additional parking spaces to a previously-approved project. There is **no impact**.

**Response c) and d) Less than Significant.** No site circulation or access issues have been identified that would cause a traffic safety problem/hazard or any unusual traffic congestion or delay that could impede emergency vehicles or emergency access. The project does not include any design features or incompatible uses that pose a significant safety risk. The project would create no adverse impacts to emergency vehicle access or circulation. Therefore, project implementation would have a ***less than significant*** impact relative to this topic.

## *XVIII. TRIBAL CULTURAL RESOURCES*

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

*Responses to Checklist Questions*

**Responses a)-b) Less than Significant.** Known tribal cultural resources or sites are not located on the project site. Additionally, unique geologic features are not located on the site. The site is currently developed with a single-family residence and surrounded by existing or future urban development. No tribal cultural resources or geologic features are anticipated to be encountered during the project's construction phase due to the disturbed nature of the site and the limited amount of excavation that would be required to implement the project.

There are no known human remains located on the project site, nor is there evidence to suggest that human remains may be present on the project site. Additionally, there are no known unique paleontological or archeological resources known to occur on, or within the immediate vicinity of the project site. Therefore, it is not anticipated that site grading and preparation activities would result in impacts to cultural, historical, archaeological or paleontological resources. Therefore, project implementation would have a ***less than significant*** impact relative to this topic

## *XIX. UTILITIES AND SERVICE SYSTEMS*

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

*Responses to Checklist Questions*

**Responses a)-e) No Impacts.** The project includes the expansion of the parking area for the Valpico Glenbriar Apartments project. The proposed project will not result in intensification of land use, or the addition of structures or uses that would differ from the previously-approved Valpico Apartments project. No additional demand for water, wastewater, electric power, natural gas, solid waste disposal or telecommunications facilities would be created by the project. The minor increase in the amount of impervious surfaces added by the project would not require the expansion of any off-site drainage infrastructure. There are **no impacts** related to this topic.

## *XX. WILDFIRE*

| | *Potentially Significant Impact* | *Less Than Significant with Mitigation Incorporation* | *Less Than Significant Impact* | *No Impact* |
|---|---|---|---|---|
| If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project: | | | | |
| a) Substantially impair an adopted emergency response plan or emergency evacuation plan? | | | X | |
| b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | | | X | |
| c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | | | X | |
| d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? | | | X | |

**Response a) and d) Less than Significant.** The project includes the expansion of the parking area for the Valpico Glenbriar Apartments complex. The proposed parking improvements would allow for decreased fire risk relative to existing conditions. The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, nor would it expose people or structures to significant risks associated with flooding or slope failure. Therefore, impacts from project implementation would be considered ***less than significant*** relative to this topic.

**Responses b) and c) Less than Significant.** The risk of wildfire is related to a variety of parameters, including fuel loading (vegetation), fire weather (winds, temperatures, humidity levels and fuel moisture contents) and topography (degree of slope). Steep slopes contribute to fire hazard by intensifying the effects of wind and making fire suppression difficult. Fuels such as grass are highly flammable because they have a high surface area to mass ratio and require less heat to reach the ignition point. The project would not result in development of structures or housing which would subject residents, visitors, or workers to long-term wildfire danger. The site is essentially flat, and is not surrounded by fuels or other conditions conducive to wildfire risks, and no fuel breaks or other associated wildfire infrastructure would be required. Therefore, impacts from project implementation are ***less than significant*** relative to this topic.

## *XXI. MANDATORY FINDINGS OF SIGNIFICANCE*

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

*Responses to Checklist Questions*

**Responses a)-c) Less than Significant.** As described throughout the analysis above, the proposed project would not result in any significant impacts to the environment. The project would not result in any cumulative impacts, impacts to biological resources or impacts to cultural and/or historical resources. These are ***less than significant*** impacts.

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