INITIAL STUDY

FOR THE

TRACY FIRE TRAINING FACILITY, CIP 71109 PROJECT

SEPTEMBER 2023

Prepared for:

City of Tracy
Development Services Department
Engineering 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

Tracy Fire Training Facility, CIP 71109

LEAD AGENCY NAME AND ADDRESS

City of Tracy
Development Services - Engineering
333 Civic Center Plaza
Tracy, CA 95376

CONTACT PERSON AND PHONE NUMBER

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209-831-6453

PROJECT SPONSOR'S NAME AND ADDRESS

Schack & Company, Inc.
1025 Central Avenue
Tracy, California 95376

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 Fire Training Facility, CIP 71109 (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 5.9 acres and is located in the northeastern portion of the City of Tracy, just south of Brichetto Road and east of the existing City of Tracy Northeast Industrial Area (NEI) Reservoir. The Project site is located on the south side of Brischetto Road, and approximately 0.09 miles east of N. Chrisman Road. The Project site encompasses a portion of Assessor Parcel Number (APN) 250-030-07. The Project's regional location is shown in Figure 1, and the Project vicinity is shown in Figure 2.

The Project site is currently used for agricultural operations. Trees are located along a portion of the western perimeter of the Project site. Lands to the north and west consist primarily of commercial uses. Lands to the south and east consist primarily of agricultural uses, with scattered residential also present to the south and east. The Project site is bounded by Brichetto Road to the north. A UPRR railroad track parallels the northern boundary of the Project site, just north of Brichetto Road.

PROJECT DESCRIPTION

The Project would include construction of a fire training facility to meet the future fire training needs of the South San Joaquin County Fire Authority (SJCFA). The Project preliminary site plan is shown on Figure 3. The proposed Project is anticipated to include an office and classroom building, a storage building, a training tower, a parking lot containing approximately 40 parking spaces, a radio tower, and a prop training field. Fire suppression tactics and other firefighter training practices are anticipated to occur within the prop training field. In addition, an isolated rail car prop for training purposes would be located in the northern portion of the Project site. Chain-link fencing would surround the perimeter of the Project site. The Project site would be accessible from an access road that would connect to N. Chrisman Road, which would be located adjacent to the southern boundary of the Tracy NEI Reservoir. A storm retention basin containing approximately 109,500 cubic feet of volume would be located in the northeast portion of the Project site. Overall, the Project proposes the following improvements, anticipated to be developed over three phases of construction:

- Phase 1:
  - Develop a site plan and identify land for fire training facility site;
  - Develop one acre of designated site (grading, asphalt, concrete pad, equipment foundation, and drainage);
  - Install site utilities (water and one fire hydrant);
  - Install fencing;
  - Erect training tower.
- Phase 2:
  - Develop additional acres of identified site (including conducting grading, pouring asphalt, and setting up concrete pad);
  - Erect pre-manufactured office and classroom building (classroom, two offices, clinical space, kitchenette, and restrooms);
  - Install additional site utilities (electrical).
- Phase 3:
  - Develop remaining acres of the identified site (including conducting grading, pouring asphalt, and setting up concrete pad);
  - Erect second classroom (optional);

- Install rail car props;
- Install drafting pit (i.e., trench);
- Install above-grade and below-grade rescue props;
- Install storage facility (large apparatus and equipment storage facility);
- Erect radio tower
- Connect Project site to city wastewater and storm water systems (optional).

The funding for Phase 1 would be provided by the Tracy Rural Fire District and the City of Tracy. The funding for Phase 2 has been allocated to South San Joaquin Fire Authority through San Joaquin County as part of the American Recovery Plan Act (ARPA) program. The funding for Phase 3 is anticipated to be funded through future grants and Public Safety Facility Master Plan Impact Fees.

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.

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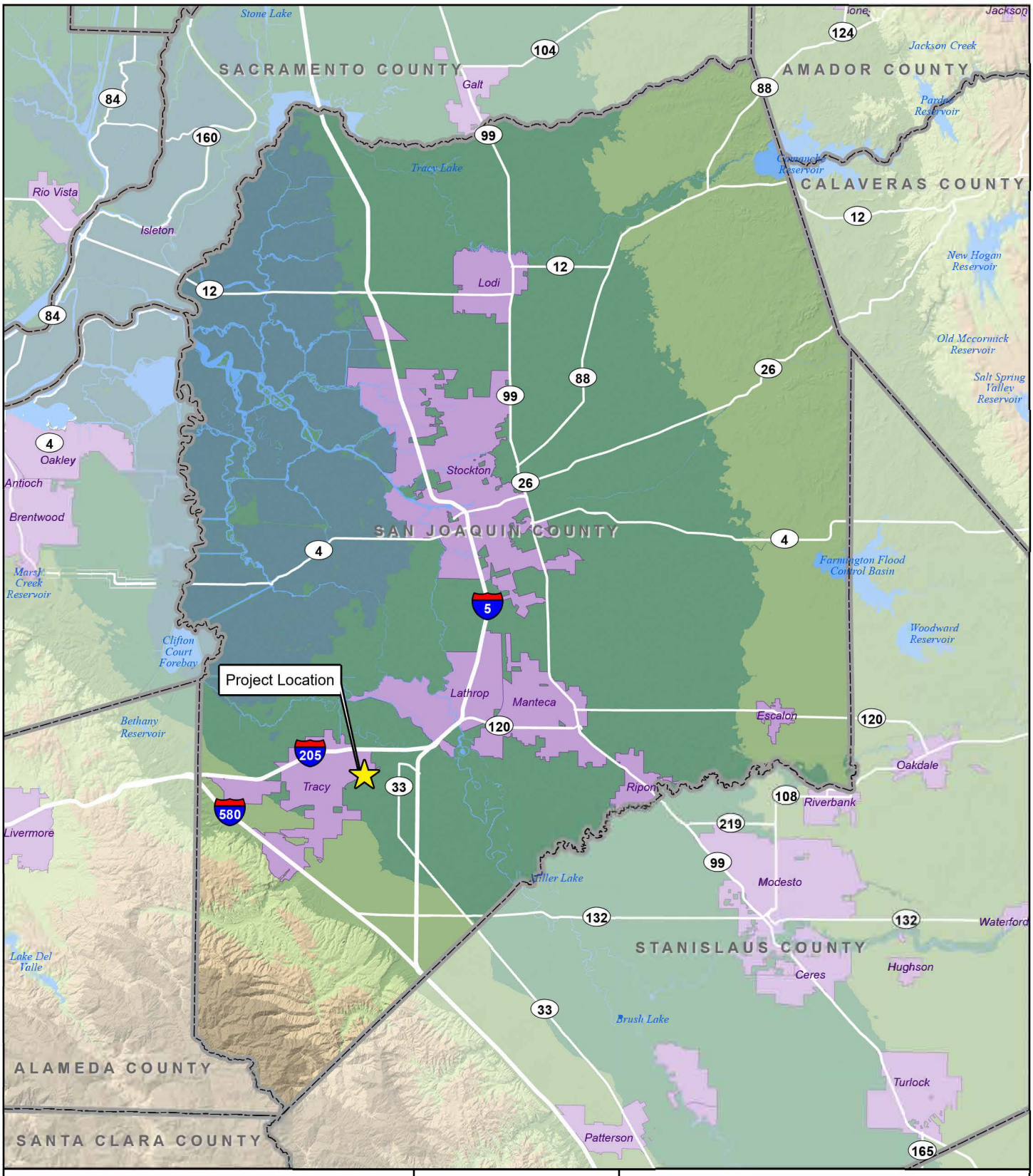

LEGEND

- Incorporated Area
- County Boundary

N

0 2½ 5

Miles

Sources: San Joaquin County GIS. Map date: March 14, 2023.

CITY OF TRACY
Tracy Fire Training Facility, CIP 71109

Figure 1. Regional Location Map

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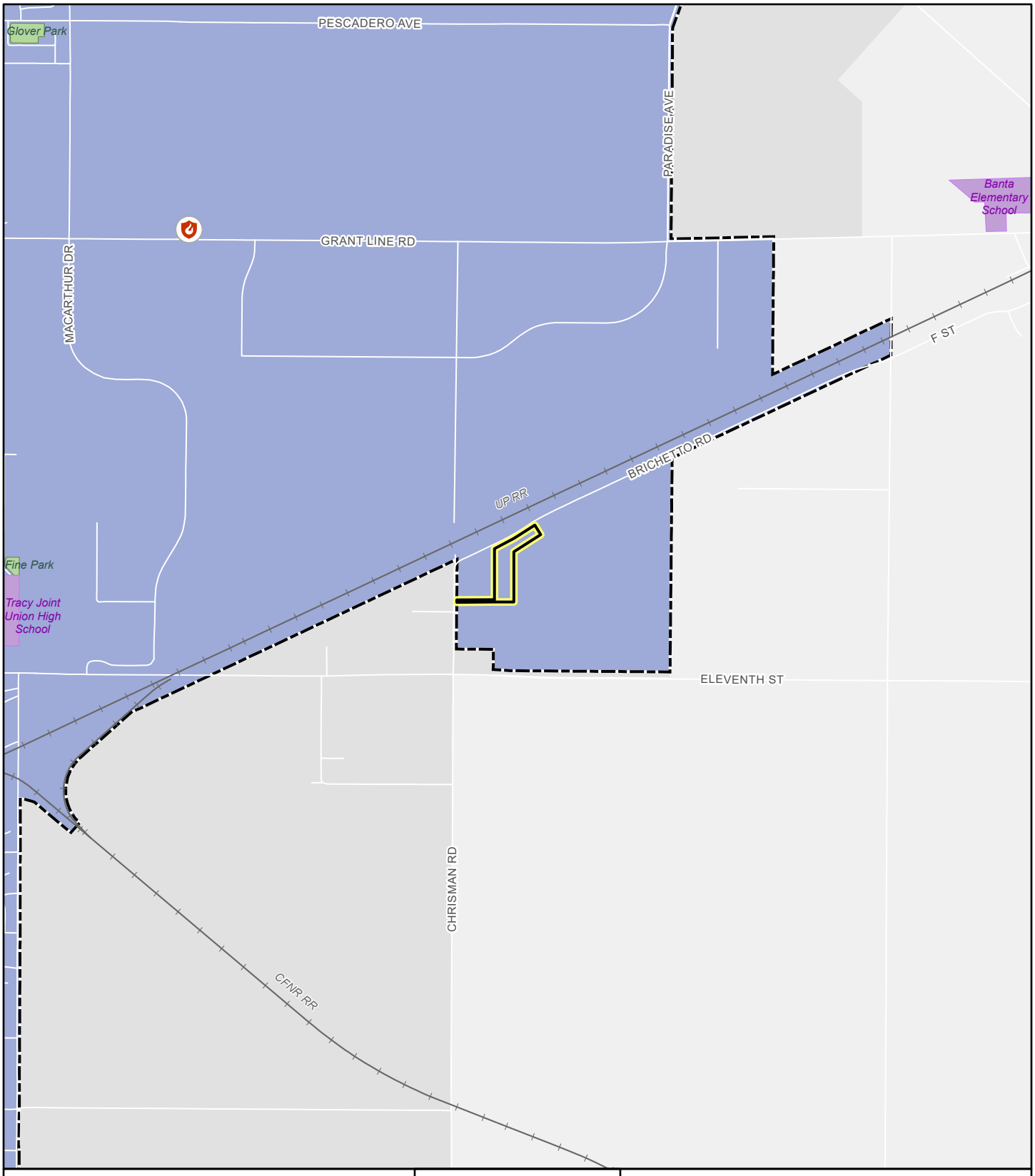

LEGEND

- Project Site
- Tracy City Limits
- Tracy SOI
- Schools
- Parks
- Tracy Fire Station #92

N

0 500 1,000

US Feet

Sources: San Joaquin County GIS. Map date: September 5, 2023.

CITY OF TRACY
Tracy Fire Training Facility, CIP 71109

Figure 2. Project Vicinity

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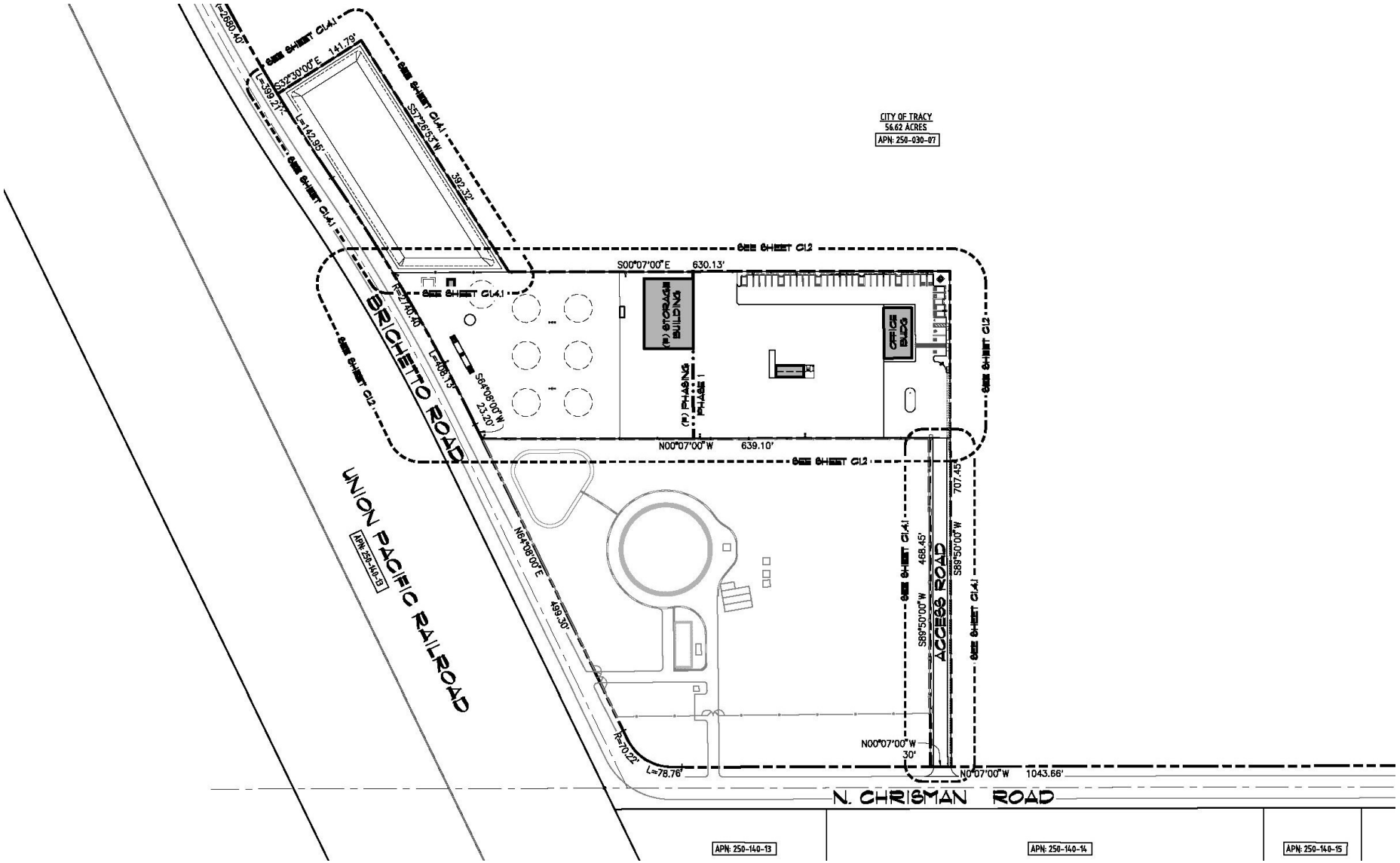

CITY OF TRACY
Tracy Fire Training Facility, CIP 71109

Figure 3. Site Plan

N

Sources: San Joaquin County GIS. Map date: September 5, 2023.

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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

9/12/2023
Date

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

Response 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.

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) 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 and 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. However, as provided in the Project site plan, exterior lighting mounted on buildings or in the parking area would be directed away from adjoining properties. Separately, glare would be generated by building windows associated with the proposed Project. However, based on the location of the Project site (i.e., away from high-traffic roadways and other potential sensitive receptors), glare generated by the Project would affect relatively small numbers of motorists and sensitive receptors.

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

Response a) Less than Significant. The Project site is currently used for agricultural operations. The Project site is designated as Prime Farmland, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency.

However, the proposed Project is identified for Public Facilities land uses in the Tracy General Plan, and the Project is consistent with the uses established by the General Plan. Development of the site for Public Facilities uses and the corresponding conversion of agricultural land associated with buildout of the Tracy General Plan, including the Project site, was taken into consideration in the City of Tracy General Plan and General Plan EIR. On February 1, 2011 the Tracy City Council adopted a Statement of Overriding Considerations (Resolution 2011-028) for the direct impacts to farmland resulting from adoption of the General Plan and the General Plan EIR (State Clearinghouse #: 1992122069).[1] As such, the proposed Project's potential impact relating to conversion of designated farmlands was adequately addressed in through the General Plan EIR process and implementation of the proposed Project would have a **less than significant** impact related to this environmental topic.

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 Center Zone (CS) by the City's Zoning Map.

[1] The General Plan EIR is available for inspection at the City of Tracy, Development Services - Planning, located at 333 Civic Center Plaza, Tracy, CA 95376

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) Less than Significant Impact. As described under Responses (a) and (b) above, the proposed Project is identified for Public Facilities land uses in the Tracy General Plan, and the Project is consistent with the uses established by the General Plan. Development of the site for Public Facilities uses and, as explained above, the corresponding conversion of agricultural land associated with buildout of the Tracy General Plan, including the Project site, was taken into consideration in the City of Tracy General Plan and General Plan EIR. Separately, the Project site does not contain forest resources. There is a **less than significant 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 San Joaquin Valley Air Pollution Control District (SJVAPCD). This agency is responsible for monitoring air pollution levels and ensuring compliance with federal and state air quality regulations within the San Joaquin Valley Air Basin (SJVAB) and has jurisdiction over most air quality matters within its borders.

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

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

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

The SJVAPCD has also prepared the *2007 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.

Responses to Checklist Questions

Responses a)-b) Less than Significant. Air quality emissions would be generated during both the construction and operational phases of the proposed Project. Based on the on-site parking anticipated to be within the Project site (i.e., 40 spaces), the proposed Project could generate up to approximately 40 workers per day, which translates to up to approximately 80 operational vehicle trips per day (since each round trip is considered two trips). However, it should be noted that this is likely to be a large overestimate, since the Project is anticipated to be utilized on a part-time (rather than full-time) basis. Other sources of operational air quality emissions include the electricity that would be used to power on-site buildings and other features. Based on the size and nature of the proposed Project, and the limited number of vehicle trips that would be generated by the proposed Project, total air quality emissions generated by the proposed Project would be minimal. 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 several 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 and building construction. 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. This Air District rule is required by law to be implemented, where applicable, and is enforced by the Air District, under the authority of the State of California Health and Safety Code, Sections 40001, 40702, 40752, and 40753, and by all officers and employees empowered by Sections 40120 and 41510 of the Health and Safety Code of the State of California, as described under the SJVAPCD's Rule 1040.

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. The Air District maintains the authority to inspect construction sites, at their discretion, for enforcement purposes.

It should also be noted that, as described in the latest version of the GAMAQI, the SJVAPCD considers projects that would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment, to also be considered to not conflict with or obstruct implementation of any applicable air quality plan.

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): Less than Significant. 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 a residence located 0.25 miles south of the Project site. The only new emissions that would be generated by the proposed Project would be the short-term, temporary emissions associated with site preparation, grading, paving, and building construction during the construction phase, and a minimal level of operational emissions associated with worker vehicle travel.

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. As explained above, the proposed Project would be required to comply with all applicable measures from SJVAPCD Rule VIII, which are enforceable by the Air District. Therefore,

dust from construction of the proposed Project would be reduced and would be consistent with SJVAPCD guidance on this topic.

With implementation of the applicable SJVAPCD requirements and given the distance between the proposed Project and the nearest sensitive receptors, 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) Less than Significant. 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 short and temporary in duration. Additionally, as previously described under Response c), the proposed Project is not anticipated to notably increase operational air emissions on this community, since average daily traffic (ADT) would only increase minimally 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. Separately, while it is likely that the fire training activities would generate localized fire and smoke at times, which could generate smoke odors, the nearest sensitive receptors are located approximately 0.25 miles from the Project site, at which distance the odors will have dissipated and would not be noticeable to the sensitive receptors. Lastly, construction activities would be temporary and minor, and average daily traffic along the roadways nearest to the neighboring residential communities do 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	

Existing Setting

The following analysis is based on information provided by the California Natural Diversity Data Base (CNDDB) record search conducted for the Project, information provided by City staff, as well as from satellite imagery of the Project site provided by Google Earth (2023).

Responses to Checklist Questions

Response a) Less than Significant. No special-status species are expected to be affected by the proposed Project, since the Project site has been previously disturbed and tilled. The proposed Project involves the construction of a fire training facility, within the northeastern portion of the City of Tracy, just south of Brichetto Road and east of the existing City of Tracy Northeast Industrial Area (NEI) Reservoir.

The Project site is currently used for agricultural operations. The California Natural Diversity Data Base (CNDDB) record search conducted for the Project did not identify any special status species observed within the Project site. Moreover, the Project site is not suitable to support any protected or special-status species. Therefore, this is a ***less than significant*** impact.

Response b) No Impact. There is no riparian habitat or other sensitive natural communities located on the Project site, according to the CNDDB record search conducted for the Project, as well as based on an analysis of satellite imagery of the Project site. As such, the proposed Project would have ***no impact*** on these resources, and no mitigation is required.

Response 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. The Project site is currently used for agricultural operations. Moreover, wetlands were not identified in the CNDDB record search conducted for the Project. Since there are no wetlands located within the Project site, and no wetlands would be impacted by the development of the Project, there is ***no impact,*** and no mitigation is required.

Response d) Less than Significant. The CNDDB record search did not reveal any documented wildlife corridors or wildlife nursery sites on or adjacent to the Project site. Furthermore, an analysis of satellite imagery of the Project site 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 San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP). The City of Tracy and the Project applicant have consulted with San Joaquin Council of Governments (SJCOG) and SJCOG has 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. Seperately, the Project would not conflict with any policies or ordinances protecting biological resources, since there are no trees or other biological resources within the Project site requiring protection. 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

Responses 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 revealed 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 unique 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 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.

Furthermore, the location of the Project site indicates that it and the surrounding area have been previously excavated. The Project site was formerly used for agricultural operations and is surrounded by existing or future urban development. No instances of cultural resources or human remains have been unearthed on the Project site, and site visits did not identify any historical, cultural, or archeological resources present on site. Therefore, it is not anticipated that site grading and preparation activities would result in impacts to cultural, historical, or archaeological resources. Overall, 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. Moreover, existing laws exist to protect cultural resources and human remains, such as Section 5097.98 of the State Public Resources Code and Section 7050.5 of California's Health and Safety Code, which require all work to be halted and the County coroner to be notified, if human remains are discovered. 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 amount of energy used at the Project site would directly correlate to the energy consumption (including fuel) used by vehicle trips generated during Project construction, fuel used by off-road construction vehicles during construction, fuel used by vehicles during Project operation, and electricity usage during Project operation.

The proposed Project would comply with all existing energy standards, including those established by the City of Tracy and San Joaquin County. For example, buildings developed as part of the proposed Project would be required to comply with the latest version of the California Building Energy Efficiency Standards (Title 24), which require a high degree of energy efficiency for new buildings. Additionally, the Project would be required to comply with other statewide measures, including those intended to improve the energy efficiency of the statewide passenger and heavy-duty truck vehicle fleet (e.g., the Pavley Bill and the Low Carbon Fuel Standard), which improve vehicle fuel economies, thereby conserving gasoline and diesel fuel for any trips that would be generated by the Project. These energy savings would continue to accrue over time.

The proposed Project is a relatively small-scale fire training facility, with limited operational energy requirements, beyond the electricity required for the on-site buildings, and fuel used for vehicle travel to and from the project site (during project operation). For construction, the proposed Project would not require energy consumption that would out of the ordinary for a Project of its size and type. Therefore, the proposed Project would not violate any state or federal energy standards and/or result in significant adverse impacts related to Project energy requirements, energy efficiencies, 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.

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 wastewater disposal systems where sewers are not available for the disposal of wastewater?			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 6.5 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, 7.3 miles southwest; the Midway fault, 8.2 miles southwest. 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): Less than Significant. 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. Most 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. According to the General Plan EIR, for the most part, Tracy is at low risk for liquefaction, except for the riverbanks of rivers within the Tracy Planning Area.

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. Implementation of the applicable objectives, policies, and actions from the General Plan Safety Element would reduce this potentially significant impact to a less than significant level. For example, Safety Element Objective SA-1.1, Policy P-1 requires underground utilities, particularly water and natural gas mains, to be designed to withstand seismic forces. Additionally, Safety Element Objective SA-1.2, Policy P-1 requires all construction within Tracy to conform to the California Building Code and Tracy Municipal Code including provisions addressing unreinforced masonry buildings. Lastly, Safety Element Objective SA-1.2, Policy P-2 requires a geotechnical report for development areas where serious geologic risks exist, although the Project site itself does not contain such risks. It is further noted that the Project would not introduce new people or habitable structures to the site. There would be a ***less than significant*** risk related to these topics associated with the construction of the proposed Project.

Response a.iv): Less than Significant. The Project site is relatively flat. As such, there is little, or no risk of landslides associated with construction and operation of the Project. This is a ***less than significant*** impact and no mitigation is required.

Response b): Less than Significant. 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 topsoil. 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, as required by the SJVPACD, would reduce the potential for soil erosion and the loss of topsoil. For example, the SJVAPCD's Rule 8021 requires the implementation of various dust control measures during site preparation and construction activities that would reduce the potential for soil erosion and the loss of topsoil. Furthermore, Rule 8301 would limit fugitive dust emissions from the outdoor handling, storage, and transport of bulk materials; Rule 8401 limits fugitive dust emissions from carryout and trackout; Rule 8501 limits fugitive dust emissions in open areas; Rule 8061 limits fugitive dust emissions from paved and unpaved roads by implementing control measures and design criteria; Rule 8071 limits fugitive dust emissions from unpaved vehicle and equipment traffic areas. These Air District rules are required by law to be implemented, where applicable, and are enforced by the Air District, under the authority of the State of California Health and Safety Code, Sections 40001, 40702, 40752, and 40753, and by all officers and employees empowered by Sections 40120 and 41510 of the Health and Safety Code of the State of California, as described under the SJVAPCD's Rule 1040.

Additionally, it should be noted that, once the grading activities are completed, the Project 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): Less than Significant. The proposed Project is anticipated to utilize septic tanks during the initial two phases of the project for the disposal of wastewater. However, implementation of proposed septic system would not be located on soils incapable of adequately supporting the use of septic tanks. The design and construction of the proposed septic system would also be required to adhere to all applicable State and local requirements relating to septic systems. Therefore, implementation of the proposed Project would result in a ***less than significant impact*** relative to this topic.

Response f): No impact. There are no known paleontological resources or sites located on the Project site. Additionally, unique geologic features are not known to be located on the site. As a result, and due to the disturbed nature of the site and the limited amount of excavation required to implement the Project, no paleontological resources or geologic features are anticipated to be encountered during the Project's construction phase. 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	

Background Information

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.

Responses to Checklist Questions

Responses a) and b): Less than Significant. 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 Project would result in limited operational emissions, given that the Project is anticipated to only increase vehicle trips by a maximum of approximately 80 trips per day[2], and since the on-site energy use required for the Project buildings and other features would be small (based on the size and nature of the buildings and other features associated with the Project). Separately, during Project construction, the only GHG emissions that would be emitted by the proposed Project would occur by off-road and on-road construction vehicles. These emissions would be very small and would not contribute meaningfully to global climate change. This is a ***less than significant*** impact.

[2] Based on the total number of parking spots that would be developed for the Project site (40). Each vehicle round trip is counted as two vehicle trips.

IX. HAZARDS AND HAZARDOUS MATERIALS

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

Responses to Checklist Questions

Responses a)-b) Less than Significant. The proposed Project could involve the use of hazardous materials. As shown in Figure 3, the proposed Project could have hazardous materials within the prop training area in the northern portion of the Project site. The hazardous materials could contain materials that would enhance the flammability of fires, for fire training purposes. Therefore, the transport, use, and disposal of hazardous materials could periodically occur. However, the transport, use, and disposal of such hazardous materials would conform to all applicable federal, State, and local laws that would prevent such activities from creating a significant hazard to the public or environment, including through reasonably foreseeable upset and accident conditions. It should also be mentioned that the nearest sensitive receptor is located approximately 0.25 miles from the Project site, providing a substantial buffer between the Project site and the nearest sensitive receptor. Furthermore, the Project site is surrounded by buffer land uses, such as the vacant land to the south and east, the City of Tracy Water Reservoir and storm basin directly to the west, and Brichetto road the UPRR rail line to the north. Therefore, any smoke from the Project site from on-site fires used for training purposes would disperse into the atmosphere widely before reaching any sensitive receptors; furthermore, any on-site fires would

be highly localized and temporary. Lastly, since the City of Tracy Water Reservoir is located directly adjacent to the Project site, ample nearby water resources would be available to address any hazards associated with on-site fires that are ignited on-site for training purposes.

Onsite reconnaissance and historical records indicate that there are no known underground storage tanks or pipelines located on the Project site that contain hazardous materials. Therefore, the disturbance of such items during construction activities is unlikely. Construction equipment and materials would likely require the use of petroleum-based products (oil, gasoline, diesel fuel), and a variety of common chemicals including paints, cleaners, and solvents. Transportation, storage, use, and disposal of hazardous materials during construction activities would be required to comply with applicable federal, state, and local statutes and regulations. Compliance would ensure that human health and the environment are not exposed to hazardous materials.

Overall, both construction and operation of the proposed Project does not pose a significant hazard to the public or the environment. There is a ***less than significant*** impact relative to this topic.

Responses c) No Impact. The Project site is not located within ¼ mile of an existing school. The nearest school is Tracy High School, located approximately 1.16 miles to the west of the Project site. Therefore, **no impact** would occur as a result of the proposed Project.

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 4.19 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 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 than 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. Additionally, while the proposed Project would generate demand for water and 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.

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. Additionally, the proposed Project includes a storm retention basin area of 49,200 square feet (containing a volume of approximately 109,500 cubic feet), which would retain the bulk of the stormwater from the new impervious surfaces associated with the Project site. Therefore, although the proposed Project adds additional impervious surfaces (such as an

asphalt parking lot) to the site that is currently pervious, the addition of impervious surfaces on-site would not lead to a violation of any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or ground water quality.

Separately, the proposed Project would not alter a stream or river. As previously stated, the implementation of the proposed Project would result in additional impervious surfaces. As a standard practice, the City requires post-Project runoff to be equal to or less than pre-Project runoff, which would ensure that the proposed Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.

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

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

New projects in the City of Tracy are required to provide site-specific storm drainage solutions and improvements that are consistent with the overall storm drainage infrastructure approach presented in the 2012 City of Tracy Citywide Storm Drainage Master Plan. Prior to approval of the improvement plans, a detailed storm drainage infrastructure plan shall be coordinated with the City of Tracy Development Services Department and Utilities Department for review and approval. The proposed Project's storm drainage infrastructure plans must demonstrate adequate infrastructure capacity to collect and direct all stormwater generated on the Project site to the existing stormwater conveyance system and demonstrate that the proposed Project would not result in on- or off-site flooding impacts.

Therefore, implementation of the proposed Project would result in a ***less than significant*** impact relative to this topic.

Responses b) and e) Less than Significant. The proposed Project would require ground water supplies, primarily for the on-site buildings and for localized fire suppression training purposes. However, the on-site buildings would not require a substantial amount of water, and the on-site fire suppression training that could require the use of water would be periodic and highly localized, thereby minimizing the amount of water needed. Overall, given the size and nature of the Project, the Project would not require substantial water use. Moreover, although a substantial amount of impervious surface would be added to the Project site (including asphalt for the on-site parking lot), on-site water runoff would be directed to the on-site storm retention basin. Moreover, the Project site is surrounded primarily by agricultural land; any runoff that is not routed to the on-site retention basin would percolate into the ground via the surrounding land. Therefore, the proposed Project would not significantly interfere with groundwater recharge. The Project site is also not located within a key groundwater recharge area. 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, 200-year, or 500-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. Development of the Project would not result in any physical barriers, such as a wall, or other division, that would divide an existing community. The Project would have ***no impact*** in regard 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 Public Facilities by the City of Tracy General Plan Land Use Map and is zoned Agriculture (A).

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, there is ***less than significant*** related to this topic.

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

Responses a)-b) No Impact. As described in the Tracy General Plan EIR, the main mineral resources found in San Joaquin County, and the Tracy Planning Area, are sand and gravel (aggregate), which are primarily used for construction materials 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-1. The MRZ-1 designation applies to areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence. 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 commercial land uses, with some limited residential uses nearby as well.

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. Project construction would occur in phases, but in total, would be anticipated to take approximately one year. 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 receptor would be located approximately 0.25 miles 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.

Separately, operational noise could be generated by on-site fire training activities, and off-site vehicle travel to and from the Project site. On-site fire training activities that could generate noise could include outdoor prop training activities in the northern portion of the Project site, as well as the potential for sirens and outdoor burns. However, with regard to on-site fire training activities, the nearest sensitive receptor is located far from the Project site.[3] Therefore, the noise associated with outdoor training activities would minimally affect the nearby sensitive receptors. Moreover, based on the Project size and type, the number of vehicles traveling to and from the Project site would be low (estimated to be a maximum of approximately 80 trips per day, based on the number of parking spaces that would be located within the Project site). Therefore, the potential for noise associated with Project operational activities to cause an increase in noise levels in excess of the local noise standards would be minimal.

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

Response 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

[3] The nearest sensitive receptor is located approximately 0.25 miles south of the Project site, south of W. 11th Street.

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 peak particle velocity (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 4.19 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 dB CNEL and the 60 dB CNEL 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. 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): No impact. The Project site is currently under the jurisdiction of the South San Joaquin County Fire Authority. The proposed Project would not add residential units to, or increase the population of, 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*** relating to this topic.

The Project site is currently under the jurisdiction of the Tracy Police Department. The proposed Project would not add residential units to, or increase the population of, 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) Less than Significant. No new residential structures or uses are included in the Project. However, the Project would generate some operational vehicle trips from workers during on-site fire training activities. Based on the parking availability anticipated to be within the Project site (i.e., 40 spaces), the proposed Project could generate up to approximately 41 workers (including trainees) per day, which translates to up to approximately 80 operational vehicle trips per day (since each round trip is considered two trips). However, it should be noted that this is likely to be a large overestimate, since the Project is anticipated to be utilized on a part-time (rather than full-time) basis. Nevertheless, this number of vehicle trips generated during Project operation would be minimal. Therefore, there is a **less than significant** relative to this topic.

Response b) Less than Significant. The proposed Project would not add a notable amount of new vehicle trips to any area roadways, as described under Response a), nor can it reasonably assumed that it would meaningfully increase the length of any existing or future vehicle trips.

Moreover, crucially, Section 15064.3 of the current CEQA Guidelines gives agencies wide latitude in assessing transportation impacts with VMT. The more technical details of calculating VMT and assessing impacts are found in a Technical Advisory issued by OPR. The Technical Advisory provides guidance on assessing VMT, different methodologies, significance thresholds, and mitigation measures.

SB 743 authorized OPR to decide whether the new VMT-based approaches would apply only to "transit priority areas" or to all areas in the state. A transit priority area is an area within one-half mile of a major transit stop. A major transit stop is a "site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." Pub. Res. Code § 21064.3. OPR has opted to require the new VMT-based analysis in all areas of the state, not just in transit priority areas. Transit priority areas are still relevant, however; land use projects within one-half mile of a major transit stop or a stop along a high-quality transit corridor should be presumed to have a less than significant transportation impact. A high-quality transit corridor is a corridor with fixed route bus service with service intervals that do not exceed 15 minutes during peak commute

hours. In addition, projects that decrease VMT in the project area as compared to existing conditions should be presumed to have a less than a significant impact.

Where quantitative models or methods are unavailable, section 15064.3 allows agencies to assess VMT qualitatively, using factors such as availability of transit and proximity to other destinations. The Guideline also states that the lead agency has discretion to choose the most appropriate methodology and can use its professional judgment to adjust its analysis accordingly.

While not legally binding, the Technical Advisory will be an important reference for agencies in determining how to calculate VMT, setting significance thresholds, and identifying mitigation measures. For instance, the Technical Advisory discusses the difference between tour-based and trip-based VMT. Trip-based VMT counts trips to and from one location (i.e., home to work) but does not count any trips taken in between, whereas tour-based VMT includes these trips. Either method can be used for residential and office projects, but the Technical Advisory recommends tour-based VMT because it is more comprehensive.

Globally, the Technical Advisory suggests that agencies use consistent methodologies for setting thresholds, estimating project VMT, and estimating reductions from mitigations, to allow for apples-to-apples comparisons.

The Technical Advisory also provides guidance for setting screening thresholds and thresholds of significance:

- As stated by the new Guideline, projects within one-half mile of a major transit stop or high-quality transit corridor should be presumed to result in a less-than-significant impact.
- Small projects that generate fewer than 110 trips per day may generally be assumed to cause a less-than-significant transportation impact.
- Agencies may develop map-based screening for residential and office projects where projects located near areas with low VMT may be presumed to have a less-than-significant transportation impact.
- Residential projects that result in per capita VMT that exceeds 85 percent of existing regional or city average VMT may indicate a significant impact.
- Office projects that result in per employee VMT that exceeds 85 percent of existing regional average VMT may indicate a significant impact.
- With retail projects, the Technical Advisory recommends that the analysis should be based on total change in VMT because retail projects usually re-route travel from other retail destinations.

Since the Project can be anticipated to generate fewer than 110 trips per day, the proposed Project fits the second guidance criteria for setting screening thresholds and thresholds of significance, as promulgated by OPR's Technical Advisory. Therefore, there is a **less than significant** impact associated with this 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 site would be

accessible from North Chrisman Road. 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 Project site was formerly used for agricultural operations and is 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 tribal cultural resources located on the Project site, nor is there evidence to suggest that tribal cultural resources may be present on the Project site. Therefore, it is not anticipated that site grading and preparation activities would result in impacts to tribal cultural 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) Less than Significant. The proposed Project would result in the intensification of the land use, and the addition of structures. The proposed Project would increase demand for water, wastewater, electric power, solid waste disposal, and telecommunications facilities. Additionally, the increase in the number of impervious surfaces added by the Project would require the installation of a storm retention basin, which would be located in the northern portion of the Project site. require the expansion of any off-site drainage infrastructure. Further discussion of these impacts is provided in detail, below.

Water

The provision of public services and the construction of onsite infrastructure improvements will be required to accommodate the development of the proposed Project. The proposed Project would require extensions of offsite water conveyance infrastructure to the Project site for potable water and irrigation water. Water distribution will be by an underground distribution system to be installed as per the City of Tracy standards and specifications, as applicable. All offsite water utility improvements will be in or adjacent to existing roadways along the perimeter of the Project site, as applicable, thereby limiting any potential impact to areas that were not already disturbed. In addition, the City of Tracy Water Reservoir is located adjacent to the Project site (to the west). Overall, although the proposed Project would generate water demand from the proposed Project buildings and the on-site fire suppression activities during training, the amount of water generated by the proposed Project would be minimal in relation to the City of Tracy water sources as a whole. The City of Tracy currently has sufficient storage capacity in Zones 1

and 2 (existing system operations) and Zone 3 (future alternative system operations) to meet the needs of the proposed Project. Therefore, the proposed Project would not result in insufficient water supplies available to serve the proposed Project from existing entitlements and resources. Therefore, the proposed Project would result in a **less than significant** impact to water supplies.

Wastewater

The provision of public services and the construction of onsite infrastructure improvements will be required to accommodate the development of the proposed Project. Although a stand-alone septic system is planned for the proposed Project for Phase 1 and Phase 2 (see Project Description for further detail), as analyzed under Section VII. Geology and Soil Impact e), the proposed Project is anticipated to require extensions of offsite wastewater conveyance infrastructure to the Project site after development of Phase 3 of the Project. Wastewater lines would be connected via existing lines along nearby roadways, as applicable. All offsite water utility improvements will be in or adjacent to existing roadways along the perimeter of the Project site, thereby limiting any potential impact to areas that were not already disturbed.

No additional off-site improvements are required to serve the Project. Additionally, preliminary review indicates the utility plan meets City requirements for on-site sewer improvements. Ultimately, the sanitary sewer collection system will be an underground collection system installed as per the City of Tracy standards and specifications. Sanitary sewer disposal and treatment will be to the City of Tracy WWTP. The development of the proposed Project would not exceed the wastewater discharge requirements in the applicable Waste Discharge Requirement (WDR) Order. Therefore, the proposed Project is anticipated to have a **less than significant** impact relative to this topic.

Storm Drainage

Because the proposed Project increases impervious surface area from an existing undeveloped and predominately previous site, the Project site could increase runoff significantly. Project impacts to stormwater are considered potentially significant. Onsite storm drainage would be installed to serve the proposed Project. Development of the proposed Project would include construction of a new storm drainage system, as well as a storm retention basin located in the northern portion of the Project site.

Pursuant to section 11.34.210 Design Standards of the City's Municipal Code, installation of the Project's storm drain system would be required to conform to the design criteria, standard plans and specifications and the inspection and testing procedures set forth in the applicable City public improvement design standards. Thus, the proposed storm drainage collection and detention system will be subject to the SWRCB and City of Tracy regulations, including: Tracy Municipal Code, Tracy Storm Drain Master Plan, 2012; Phase II, NPDES Permit Requirements; NPDES-MS4 Permit Requirements; and LID Guidelines.

New projects in the City of Tracy are required to provide site-specific storm drainage solutions and improvements that are consistent with the overall storm drainage infrastructure approach presented in the 2012 City of Tracy Citywide Storm Drainage Master Plan. Prior to approval of the improvement plans, a detailed storm drainage infrastructure plan shall be coordinated with the City of Tracy Development Services Department and Utilities Department for review and approval. The proposed Project's storm drainage infrastructure plans must demonstrate adequate infrastructure capacity to collect and direct all stormwater generated on the Project site to the existing stormwater conveyance system and demonstrate that the proposed Project

would not result in storm water drainage impacts. Therefore, the proposed Project is anticipated to have a **less than significant** impact relative to this topic.

Solid Waste

The City of Tracy contracts with Tracy Disposal Service, a private company, for solid waste collection and disposal. Based on the Project size and type, solid waste generated by the proposed Project would be minimal. Solid waste would be generated mostly by the on-site Project buildings and would be anticipated to be 50 pounds per day or less.

Currently, the permitted capacity of the Foothill Landfill is 102 million cubic yards. The remaining capacity of the facility is approximately 95 million cubic yards. The remaining capacity of the facility is approximately 95 million cubic yards. Current permits indicate a closure in 2054. There are no plans to expand the Foothill Landfill or build a new one to accommodate Tracy's waste since the Foothill Landfill is expected to meet the City's needs for the foreseeable future. The addition of the volume of solid waste associated with the proposed Project to the Foothill Landfill would not exceed the landfill's remaining capacity.

Overall, the proposed Project would be required to comply with applicable State and local requirements including those pertaining to solid waste, construction waste diversion, and recycling. The City would coordinate development of the proposed Project with Tracy Disposal Service. Furthermore, the addition of the volume of solid waste associated with the proposed Project, approximately 0.03 tons per day, would increase the total tons of solid waste to the MRF; however, this increase would not cause an exceedance of the landfill's remaining capacity. Therefore, the proposed Project would not generate solid waste in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals or exceed any State or local standards associated with solid waste. Therefore, the proposed Project is anticipated to have a **less than significant** impact relative to this topic.

Conclusion

There are ***less than significant*** 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 proposed 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. As a result, 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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