

# Central Lathrop Specific Plan Environmental Impact Report Addendum II

State Clearinghouse No. 2003072132

PREPARED FOR:  
City of Lathrop  
390 Towne Centre Drive  
Lathrop, CA 95330

March 2014

# Central Lathrop Specific Plan Environmental Impact Report Addendum II

State Clearinghouse No. 2003072132

PREPARED FOR:  
City of Lathrop  
390 Towne Centre Drive  
Lathrop, CA 95330

CONTACT:  
Rebecca Willis  
Community Development Director  
209.941.7267

PREPARED BY:  
Ascent Environmental, Inc.  
455 Capitol Mall, Suite 300  
Sacramento, California 95814

CONTACT:  
Gary Jakobs  
Sean Behta  
916.444.7301

March 2014

# Table of Contents

Section	Page
<b>ACRONYMS AND ABBREVIATIONS</b> .....	<b>ii</b>
<b>1 INTRODUCTION</b> .....	<b>1-1</b>
1.1 Background and Action Triggering the Addendum .....	1-1
1.2 California Environmental Quality Act Guidelines Regarding an Addendum to an Environmental Impact Report.....	1-1
<b>2 DESCRIPTION OF THE PROPOSED ACTION</b> .....	<b>2-1</b>
2.1 Project Overview .....	2-1
2.2 Project Characteristics and Changes to the Previously-Approved Specific Plan.....	2-1
2.3 facility Construction and operations .....	2-3
<b>3 ENVIRONMENTAL CONSEQUENCES OF THE PROPOSED ACTION</b> .....	<b>3-1</b>
3.1 Methodology and Design of Analysis .....	3-1
3.2 Impact Evaluation Checklist.....	3-2
3.3 Conclusions Regarding the Environmental Analysis of the Proposed Project Modifications .....	3-64
<b>4 LIST OF PREPARERS AND PERSONS CONSULTED</b> .....	<b>4-1</b>
4.1 List of Preparers.....	4-1
4.2 Persons Consulted .....	4-1
<b>5 REFERENCES</b> .....	<b>5-1</b>

## Acronyms and Abbreviations

AB	Assembly Bill
ARB	California Air Resources Board
BMPs	best management practices
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFC	Chlorofluorocarbon
CH <sub>4</sub>	methane
CLSP	Central Lathrop Specific Plan
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> e	carbon dioxide equivalent
DTSC	California Department of Toxic Substances Control
EPA	U.S. Environmental Protection Agency
ESA	Environmental Site Assessment
GHG	greenhouse gas
HCFC	Hydro-chlorofluorocarbon
I-	Interstate
MMT	million metric tons
N <sub>2</sub> O	nitrous oxide
NAHC	Native American Heritage Commission
NO <sub>x</sub>	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
PG&E	Pacific Gas and Electric
PM <sub>10</sub>	particulate matter less than 10 micrometers in diameter
RWQCB	Regional Water Quality Control Board
SF <sub>6</sub>	Sulfur hexafluoride
SJCMSCP	San Joaquin County Multi-Species Habitat Conservation and Open Space Plan
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
SJVAPCD	San Joaquin Valley Air Pollution Control District
TACs	toxic air contaminants
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
VELB	valley elderberry longhorn beetle

# 1 INTRODUCTION

## 1.1 BACKGROUND AND ACTION TRIGGERING THE ADDENDUM

On November 9, 2004, the City of Lathrop (City) certified the Environmental Impact Report (EIR) for the Central Lathrop Specific Plan (CLSP) and approved various entitlements, such as amendments to the *City of Lathrop General Plan* and the *Lathrop Water, Wastewater, and Recycled Water Master Plan*, and cancellation of existing Williamson Act contracts on various parcels.

The CLSP consists of a mixed-use residential/commercial development on approximately 1,521 acres of primarily agricultural land located immediately west and north of the existing corporate limits of the City of Lathrop in San Joaquin County, California. The proposed project includes 6,790 residential units at various densities, up to approximately 5 million square feet of office/commercial uses, a Main Street District, neighborhood and community parks, schools, and open-space areas.

The project proponent has proposed to temporarily use a portion of the CLSP area to store and/or dispose of recycled wastewater. While a similar temporary use was evaluated in the 2004 CLSP EIR, it was considered for different parcels (which are located in the northernmost portion of the CLSP area). This addendum to the 2004 CLSP EIR evaluates the proposed use of 12 different parcels in the CLSP area for temporary recycled water storage or disposal. These new parcels may form all of the project's onsite recycled water storage and disposal sites, or may be developed in conjunction with the parcels evaluated in the 2004 CLSP EIR. No changes to the development proposal or other elements of the CLSP project are considered.

## 1.2 CALIFORNIA ENVIRONMENTAL QUALITY ACT GUIDELINES REGARDING AN ADDENDUM TO AN ENVIRONMENTAL IMPACT REPORT

Altered conditions, changes, or additions to the description of a project that occur after certification of an EIR may require additional analysis under the California Environmental Quality Act (CEQA). The legal principles that guide decisions regarding whether additional environmental documentation is required are provided in the State CEQA Guidelines, which establish three primary mechanisms to address these changes: a Subsequent EIR, a Supplement to an EIR, and an Addendum to an EIR.

Section 15162 of the State CEQA Guidelines describes the conditions under which a Subsequent EIR would be prepared. In summary, when an EIR has been certified for a project, no Subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in light of the whole record, one or more of the following:

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

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous EIR;

(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternatives; or

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

Section 15163 of the State CEQA Guidelines states that a lead agency may choose to prepare a supplement to an EIR rather than a Subsequent EIR if:

(1) Any of the conditions described above for Section 15162 would require the preparation of a Subsequent EIR; and

(2) Only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.

An addendum is appropriate where a previously certified EIR has been prepared and some changes or revisions to the project are proposed, or the circumstances surrounding the project have changed, but none of the changes or revisions would result in significant new or substantially more severe environmental impacts, consistent with CEQA Section 21166 and State CEQA Guidelines Sections 15162, 15163, 15164, and 15168. In the case of the changes to the project under consideration, an addendum is the appropriate document based on the analysis provided herein.

This addendum is organized as an environmental checklist, and evaluates all environmental topic areas for any changes in circumstances or the project description, as compared to the approved CLSP, to determine whether such changes were or were not adequately covered in the certified *Final Environmental Impact Report for the Central Lathrop Specific Plan*. This checklist is not the traditional CEQA Environmental Checklist that is found in Appendix G of the CEQA Guidelines. The checklist in Appendix G of the CEQA Guidelines is typically used to determine if a project as proposed, or proposed and altered to reduce impacts, has the potential to result in significant environmental impacts. As explained below in Section 3.1, the purpose of the modified checklist is to evaluate the checklist categories in terms of any “changed condition” (i.e., changed circumstances, project changes, or new information of substantial importance) that may result in new or more severe significant impacts compared to the conclusions from 2004 CLSP EIR. The intent is to use the checklist to determine the appropriate subsequent environmental document for evaluating of the proposed changes. The column titles of the checklist have been modified from the Appendix G presentation to help answer the questions to be addressed pursuant to CEQA Section 21166 and State CEQA Guidelines Sections 15162, 15163, 15164 and 15168.

## 2 DESCRIPTION OF THE PROPOSED ACTION

This addendum to the 2004 CLSP EIR evaluates the use of 12 parcels within the CLSP development area for temporary recycled water storage and disposal (via agricultural irrigation) facilities. The purposes of this addendum are to: 1) document details regarding the proposed project modification; and 2) evaluate whether this change would result in new or more severe significant impacts that would not be addressed by adopted mitigation measures. Consistent with this purpose, the project description provided below focuses on the details of the proposed recycled water storage and disposal.

### 2.1 PROJECT OVERVIEW

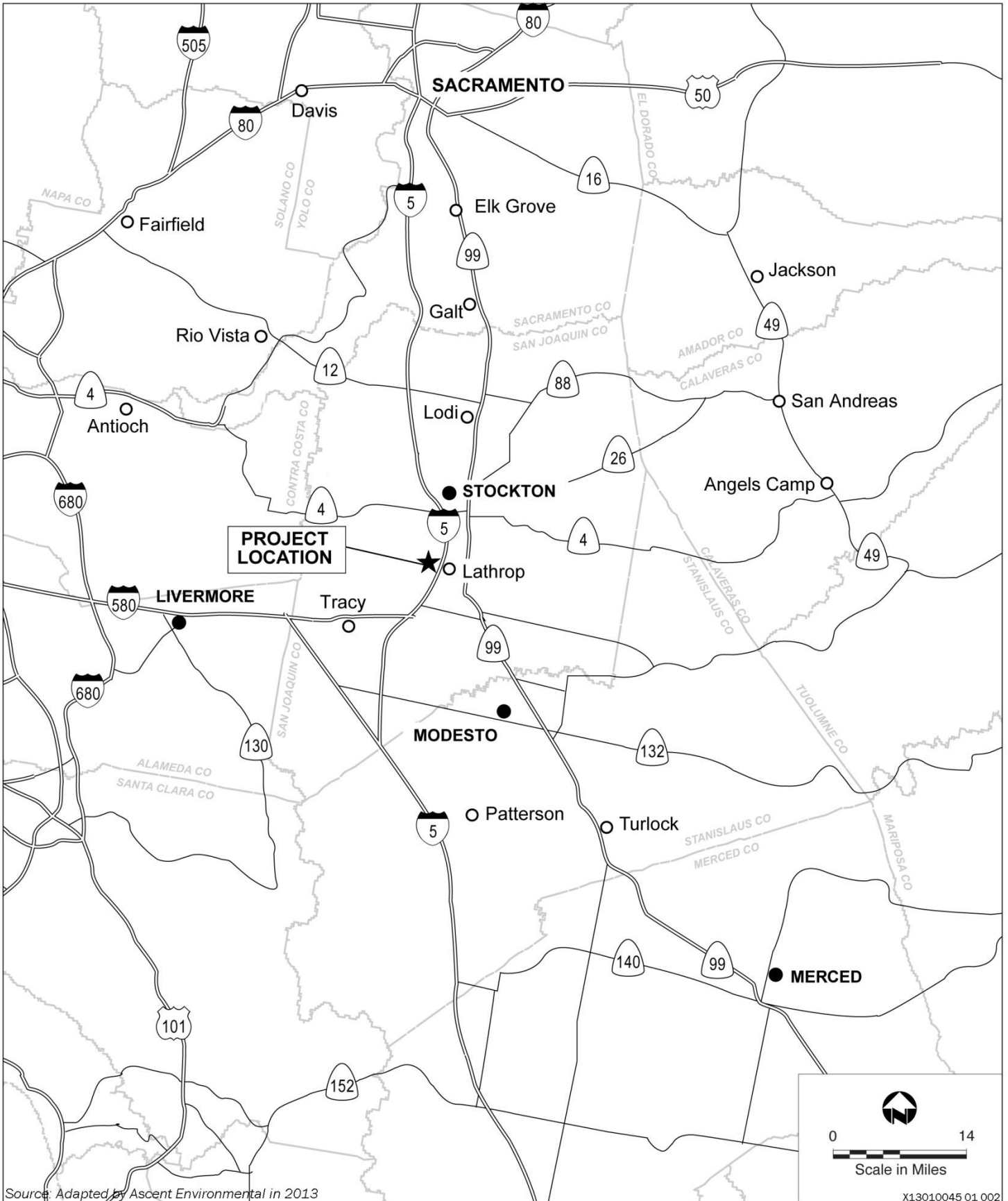
The CLSP is a policy statement and implementation tool that details standards and development criteria to supplement the policies of the City of Lathrop's General Plan as applied to the CLSP property. The CLSP is designed to guide the construction and operation of a mixed-use residential/commercial development on approximately 1,521 acres of land. The CLSP area is located in the City of Lathrop in San Joaquin County, California, between Interstate 5 (I-5) and the San Joaquin River (Exhibit 1). The CLSP project plans for 6,790 residential units at various densities, up to approximately 5 million square feet of office/commercial uses, a Main Street District, neighborhood and community parks, schools, and open-space areas. Off-site project elements include expansion of the City of Lathrop water recycling plant and land to be used for storage and disposal of treated recycled water (826 acres were evaluated in the CLSP EIR, but only 318 acres would be needed to support the CLSP project), as well as the siting of various utility lines. The CLSP project would be implemented in two phases: Phase 1, which encompasses approximately the southern two-thirds of the CLSP area; and Phase 2, covering the remaining northern portion of the plan area.

In November 2004, the City of Lathrop certified the EIR for the CLSP and approved various entitlements, such as amendments to the *City of Lathrop General Plan* and the *Lathrop Water, Wastewater, and Recycled Water Master Plan* and cancellation of existing Williamson Act contracts on various parcels. In December 2005, an addendum to the EIR was adopted addressing a proposed agricultural easement exchange in support of Williamson Act compliance that was not considered in the original EIR. The CLSP area was annexed into the City of Lathrop in September 2005.

Although the 2004 CLSP EIR assumed construction of Phase 1 in 2010, the CLSP area remains mostly undeveloped, and portions remain in agricultural use. Development that has occurred within the CLSP area is limited to the construction of main roads and installation of some underground utility infrastructure, and the completion of Lathrop High School north of Lathrop Road. In addition, construction of the Lathrop Generations Center (a parks and recreation facility located at 450 Spartan Way) began in June 2013.

### 2.2 PROJECT CHARACTERISTICS AND CHANGES TO THE PREVIOUSLY-APPROVED SPECIFIC PLAN

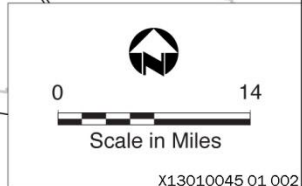
The CLSP proposes the use of recycled water for irrigation of public landscaping areas (e.g., road medians, parks, commercial landscaping, school sports fields), and potentially private yards in the plan area, both to dispose of recycled water and as a general water conservation measure. Temporary storage would be required for excess recycled water and during periods when irrigation is not feasible (e.g., during periods of winter precipitation). Recycled water may also be disposed of through irrigation of agricultural land.



Source: Adapted by Ascent Environmental in 2013

X13010045 01 002

**Exhibit 1 Central Lathrop Specific Plan Project Vicinity**





The 2004 CLSP EIR identified six potential recycled water storage or disposal areas; five of which are outside of the CLSP area (Exhibit 2). The area evaluated for recycled water storage and disposal within the CLSP project site would be located in the portion of the project site that would be developed for urban use in Phase 2, and would only be used temporarily during Phase 1. The CLSP addressed the option of constructing temporary recycled water storage and disposal facilities on 413 acres in the northernmost portion of the CLSP area, from De Lima Road north to the CLSP boundary (area number 4 in Exhibit 2). As Phase 2 is built out, the recycled water storage/disposal capacity provided by the temporary area would be transferred to one or more of five off-site areas evaluated in the 2004 CLSP EIR. (There are no changes with regard to the future use of the five off-site areas evaluated in this addendum.)

Since certification of the 2004 CLSP EIR, the applicant has identified 12 additional parcels in the northern portion of the CLSP area, generally between De Lima Road and Dos Reis Road, that are also being considered for use as temporary, onsite recycled water storage and disposal facilities (Exhibit 3). The parcels are entitled for future development as part of the CLSP and would be used for recycled water storage and disposal on a temporary basis, until conditions are appropriate to develop these sites consistent with the CLSP. The 12 parcels cover a total of approximately 180 acres. The 180 acres would be developed as temporary recycled water storage ponds and land disposal areas to support the development of other properties within the Central Lathrop development. Up to 40 acres would be developed as recycled water storage ponds, with the remainder being used as land disposal.

Operation and maintenance of recycled water storage ponds and disposal sites would be much the same as described in the CLSP EIR. Ponds would provide temporary storage of recycled water during periods when irrigation is not feasible. Recycled water disposal sites would consist of agricultural fields irrigated with recycled water, and would in effect be a continuation of existing uses on what are now agricultural lands.

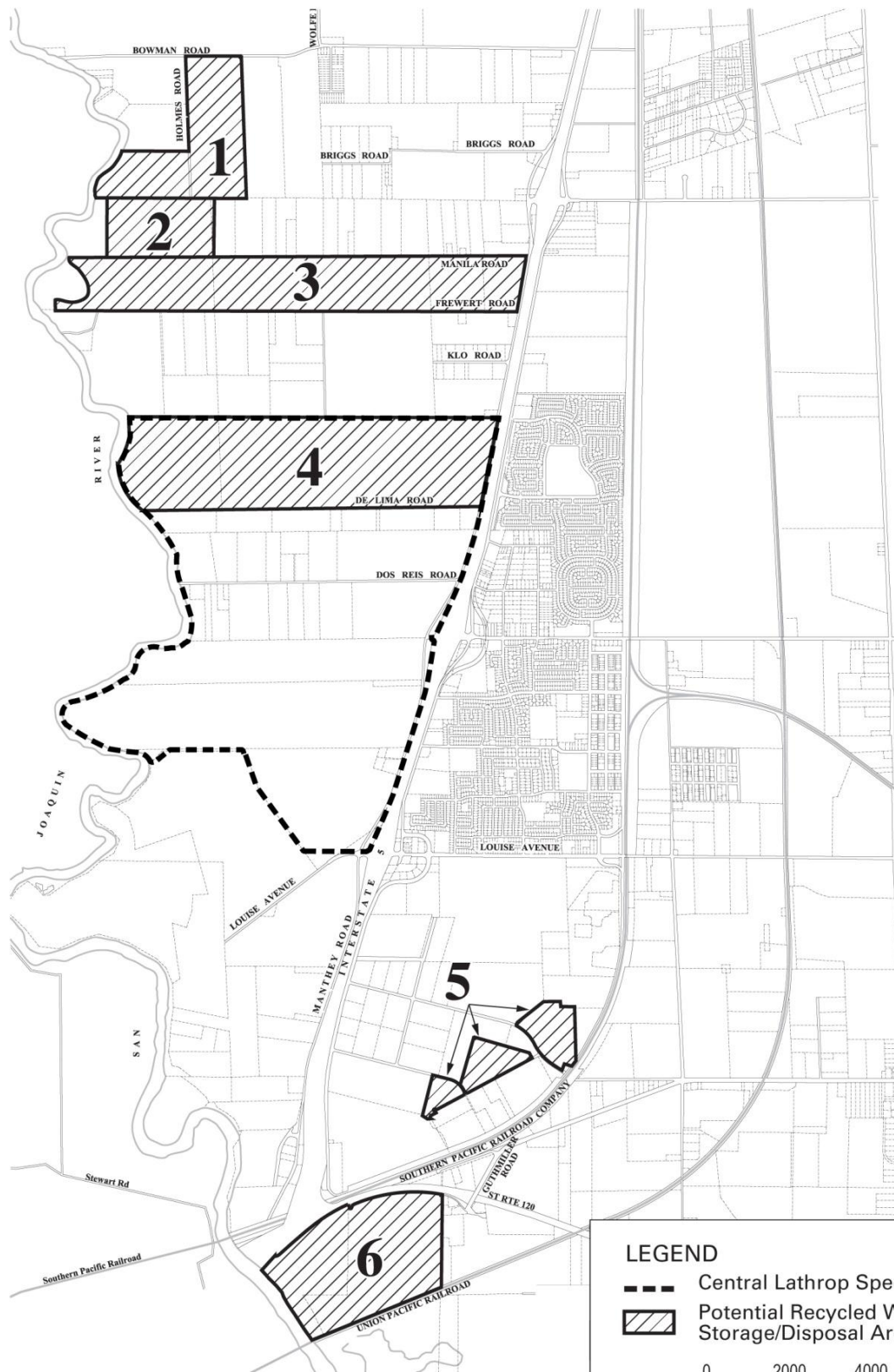
Pipelines conveying recycled water from the City of Lathrop's water recycling plants to the storage ponds and sprayfields would follow the main roadways (including Dos Reis Road, De Lima Road, and Golden Valley Parkway) in the area.

## **2.3 FACILITY CONSTRUCTION AND OPERATIONS**

Operations of recycled water storage ponds and disposal/spray fields would follow all California Code of Regulations Title 22 standards for the storage and use of recycled water.

Recycled water storage ponds would be designed and constructed as open reservoirs in accordance with the City of Lathrop's Recycled Water System Design and Construction Standards. No pond water surface would be closer than 100 feet to any domestic well. Signs at the periphery of all storage facilities and use areas would notify the public of the presence of recycled water. Storage pond sites would be fenced.

The storage ponds would be constructed using earth removed from the pond area to construct levees around the ponds (i.e., using the "cut and fill" method of construction). To the extent feasible, the height of pond levees above the ground surface would not exceed 15 feet. Storage capacity for each pond would not exceed 1,500 acre feet, which would classify them as nonjurisdictional by the Department of Water Resources, Division of Safety of Dams. The ponds would be designed with 2 feet of freeboard, or the height of anticipated wind-generated waves, whichever is greater. The bottoms of the ponds would be sloped to drain, which would minimize puddles and the associated risk of mosquito breeding when a pond is drained. The pond sites and the outside levee slopes could be landscaped and irrigated with tertiary-treated effluent.



**LEGEND**

- Central Lathrop Specific Plan Area
- Potential Recycled Water Storage/Disposal Areas

0      2000      4000  

 FEET

NORTH

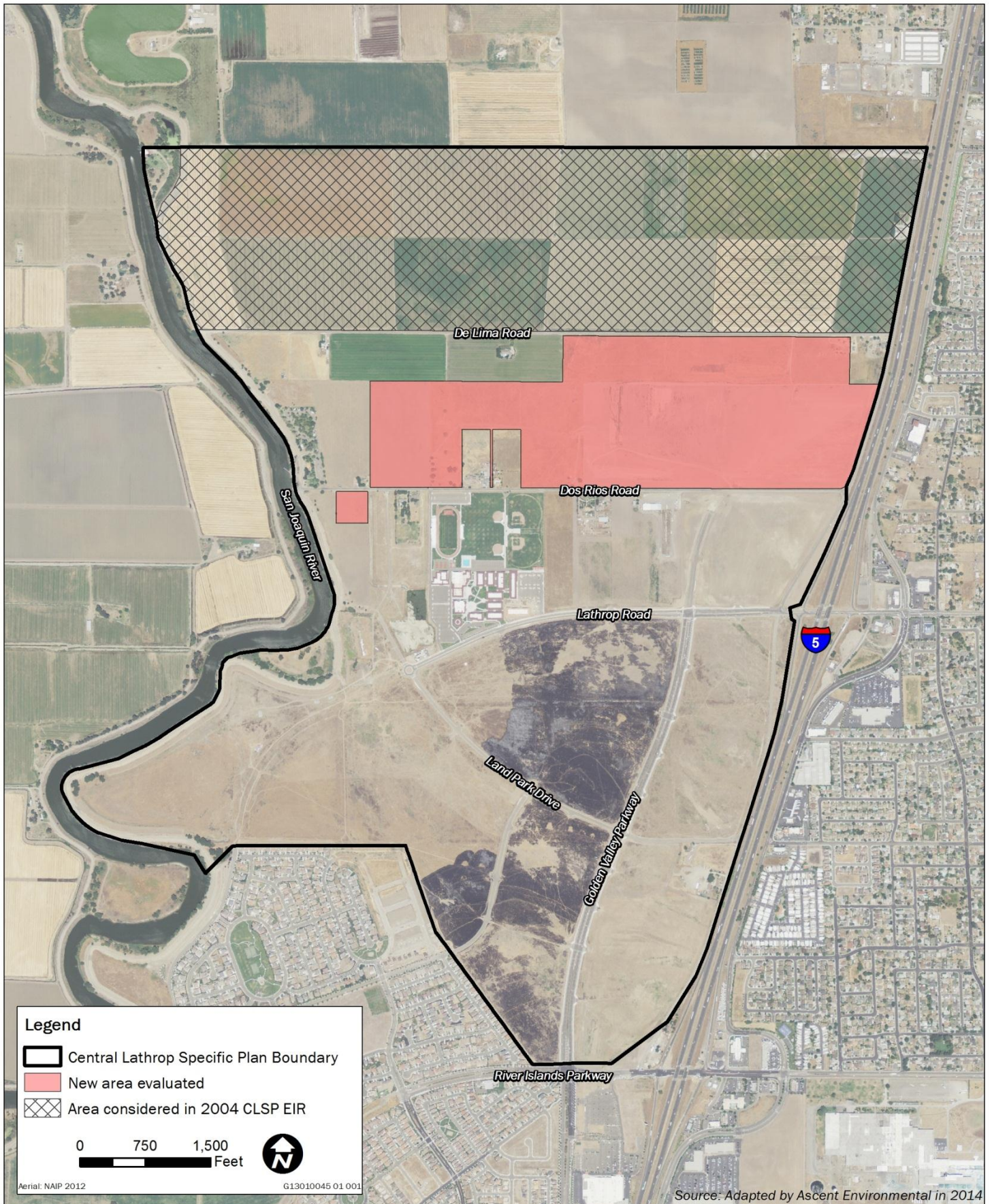
X13010045 01 001

Source: MacKay & Somp 2004

**Exhibit 2      Areas Considered for Recycled Water Storage and Disposal Facilities  
 in the 2004 CLSP EIR**







**Exhibit 3**

**Additional Areas Under Evaluation for Temporary Recycled Water Storage and Disposal Facilities**



Recycled water disposal areas (spray fields) would be irrigated with recycled water with the potential to produce edible crops (carrots, tomatoes, asparagus, watermelons, and others) and nonedible crops (alfalfa and other fodder crops).

The following measures (consistent with Title 22 requirements) would be implemented to minimize the amount of recycled water runoff/overspray at the respective use areas and to assure system reliability:

- ▶ No irrigation would occur during and within the first 24 hours after a rainfall event.
- ▶ No irrigation would occur within 50 feet of any domestic well.
- ▶ No irrigation area would be located within 50 feet of a surface water body or an irrigation canal drainage course.
- ▶ Irrigation systems, including siphon, sprinkler, and flood irrigations, would be periodically inspected during the irrigation season.
- ▶ Spray irrigation would not take place when winds are above 30 miles per hour.
- ▶ Agricultural fields would be bermed, and the tailwater would drain toward a tailwater pump that would return the collected water to the irrigation system.
- ▶ Staff associated with the operation of these (and other) use areas and the general public would be informed of the use of recycled water by advisory signs that would be posted at the periphery of the area.

## 3 ENVIRONMENTAL CONSEQUENCES OF THE PROPOSED ACTION

### 3.1 METHODOLOGY AND DESIGN OF ANALYSIS

#### 3.1.1 EXPLANATION OF CHECKLIST EVALUATION CATEGORIES

This checklist and analysis are not a traditional CEQA “Initial Study” checklist and analysis. The purpose of this checklist is to evaluate the categories in terms of any “changed condition” (i.e., changed circumstances, project changes, or new information of substantial importance) that may result in a different environmental impact significance conclusion from the certified Final EIR for the CLSP. The row titles of the checklist include the full range of environmental topics, as presented in Appendix G of the State CEQA Guidelines. The column titles of the checklist have been modified from the Appendix G presentation to help answer the questions to be addressed pursuant to CEQA Section 21166 and State CEQA Guidelines Section 15162, 15163, 15164, and 15168. A “no” answer does not necessarily mean that there are no potential impacts relative to the environmental category, but that there is no change in the condition or status of the impact since it was analyzed and addressed with mitigations in the CLSP EIR. The purpose of each column of the checklist is described below.

#### **WHERE IMPACT WAS ANALYZED IN THE 2004 CENTRAL LATHROP SPECIFIC PLAN FEIR**

This column provides a cross-reference to the pages where information and analysis may be found relative to the impact criteria listed under each topic.

#### **DO PROPOSED CHANGES INVOLVE NEW OR SUBSTANTIALLY MORE SEVERE SIGNIFICANT IMPACTS?**

Pursuant to Section 15162(a)(1) of the State CEQA Guidelines, this column indicates whether the changes represented by the current project will result in new significant impacts that have not already been considered by the prior environmental review or a substantial increase in the severity of a previously identified impact.

#### **DO ANY NEW CIRCUMSTANCES INVOLVE NEW OR SUBSTANTIALLY MORE SEVERE SIGNIFICANT IMPACTS?**

Pursuant to Section 15162(a)(2) of the CEQA Guidelines, this column indicates whether there have been changes to the project site or the vicinity (circumstances under which the project is undertaken) that have occurred subsequent to the prior environmental documents, which would result in the current project having new significant environmental impacts that were not considered in the prior environmental documents or that substantially increase the severity of a previously identified impact.

#### **ANY SUBSTANTIALLY IMPORTANT NEW INFORMATION REQUIRING NEW ANALYSIS OR VERIFICATION?**

Pursuant to Section 15162(a)(3)(A-D) of the State CEQA Guidelines, this column indicates whether new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental documents were certified as complete is available, requiring an update to the analysis of the previous environmental documents to verify that the environmental conclusions and mitigations remain valid. If the new information shows that: (A) the project will have one or more significant effects not discussed in the prior environmental documents; or (B) that significant effects previously examined will be substantially more severe than shown in the prior environmental documents; or (C) that mitigation measures or alternatives previously found not to be feasible would in fact be



feasible and would substantially reduce one or more significant effects or the project, but the project proponents decline to adopt the mitigation measure or alternative; or (D) that mitigation measures or alternatives which are considerably different from those analyzed in the prior environmental documents would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative, the question would be answered 'Yes' in the checklist, requiring the preparation of a subsequent EIR or supplement to the EIR. However, if the additional analysis completed as part of this environmental checklist review finds that the conclusions of the prior environmental documents remain the same and no new significant impacts are identified, or identified environmental impacts are not found to be substantially more severe, the question would be answered 'Yes, but no significant impact would occur' and no additional EIR documentation (supplement to the EIR or subsequent EIR) would be required.

### **DO MITIGATION MEASURES IN THE 2004 CENTRAL LATHROP SPECIFIC PLAN EIR ADDRESS/RESOLVE IMPACTS?**

Pursuant to Section 15162(a)(3) of the CEQA Guidelines, this column indicates whether the prior environmental documents provide mitigation for the CLSP that would also apply to impacts associated with the proposed modified components of the plan. If "N/A" is indicated, there is no significant impact requiring mitigation under the CLSP as analyzed in the 2004 EIR or with the proposed project modifications evaluated in this addendum.

#### **3.1.2 EXPLANATION OF DISCUSSION, MITIGATION MEASURES, AND CONCLUSIONS SECTIONS**

##### **DISCUSSION**

A discussion of the elements of the checklist is provided under each environmental category to clarify the answers. The discussion provides information about the particular environmental issue, how the project relates to the issue, and the status of any mitigation that may be required or that has already been implemented.

##### **MITIGATION MEASURES**

Applicable mitigation measures from the prior environmental review that apply to the project are summarized under each environmental category. New mitigation measures are included, if needed.

##### **CONCLUSIONS**

A discussion of the specific conclusion for each topical section relating to the need for additional environmental documentation is contained at the end of each separate section.

#### **3.2 IMPACT EVALUATION CHECKLIST**

A summary of findings and overall conclusions of the environmental checklist and requirements for further environmental documentation pursuant to CEQA Guidelines 15162, 15163, 15164, and 15168 are provided following the checklist items.

Environmental Issue Area	Where Impact Was Analyzed in the 2004 Central Lathrop Specific Plan FEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the 2004 Central Lathrop Specific Plan FEIR Address/Resolve Impacts?
<b>1. Aesthetics. Would the Project:</b>					
a. Have a substantial adverse effect on a scenic vista?	4.18-8 to 4.18-9	No	No	No	No
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	4.18-9	No	No	No	No
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	4.18-9 to 4.18-11	No	No	No	No
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	4.18-11 to 4.18-12	No	No	No	No

## DISCUSSION

The CLSP area is generally flat, sloping at less than a 1 percent gradient from east to west (from I-5 toward the San Joaquin River). The area is almost entirely undeveloped; agricultural uses dominate the landscape. Structures that typically would be found in agricultural settings, such as equipment storage facilities, sheds, single-family dwellings, and irrigation equipment are scattered throughout the plan area. Although the associated riparian vegetation is apparent from portions of the plan area, the San Joaquin River is not visible from the CLSP because of substantial levees at the western edge of the planning area. The area to the south has been developed, primarily for residential use. To the east, much of I-5 is elevated above ground level, obstructing views into and out of the CLSP area.

There are no new circumstances since certification of the CLSP EIR that would influence aesthetics impacts associated with the CLSP or the project modifications evaluated in this addendum, and there is no new information requiring analysis or verification. The 2004 CLSP EIR assumed conversion of the 12 parcels under evaluation from agricultural to urban uses. Because of the scale and location of the CLSP, there is no feasible mitigation available to substantially reduce the impacts to visual resources associated with the conversion of agriculture land to urban development. Impacts to the visual character of the CLSP area were determined significant and unavoidable in the 2004 CLSP EIR. Impacts to scenic vistas, scenic highways, and the visual quality of the area due to light and glare were determined less than significant. The temporary use of parcels within the CLSP area for recycled water storage would not result in new or more severe significant impacts because the eventual conversion from rural to urban character has already been evaluated, and the proposed open ponds and earthen berms would be set apart from existing urban development.

- a) A scenic vista is generally considered a view of an area that has remarkable scenery or a resource that is indigenous to the area. The CLSP project site itself does not provide any aesthetic resources that would

be considered a scenic vista. The vacant, disturbed areas, agricultural lands, and rural residences that make up the project site do not provide scenery of a remarkable character.

- b) The designated scenic highway segment closest to the planning area is a portion of I-580 approximately 13 miles away. The CLSP is not visible from the scenic highway segment. These conditions have not changed since certification of the CLSP EIR.
- c) The CLSP EIR identified a significant impact associated with conversion of the agricultural/rural landscape to urban development. Because of the San Joaquin River levee to the west, the elevation of I-5 to the east, and the buffer between the Phase 1 development to the south and existing residences to the north, there would be limited potential to view the proposed temporary recycled water storage or disposal sites. Further, temporary use of properties for recycled water storage or disposal would be consistent with the existing, rural nature of the area. The nearest concentration of sensitive receptors would be the students and faculty of Lathrop High School, which was constructed near the 12 parcels under evaluation after certification of the 2004 CLSP EIR. Since the landscape is already disturbed and the surrounding areas are in various stages of urban development, the grading activities required to construct recycled water storage ponds are unlikely to contribute to degradation of the visual character of the area, as experienced from the vantage of the school site.
- d) Neither recycled water storage ponds, nor spray fields used to dispose of water, would require additional lighting. The high walls of the ponds (approximately 15 feet above the ground surface) would limit the potential for reflections off the pond surface to create a new source of substantial glare.

### ***Mitigation Measures***

The 2004 CLSP EIR does not provide aesthetics mitigation measures for temporary use of parcels within the CLSP for recycled water storage and disposal, as this activity would not result in any significant impacts. The project modifications evaluated in this addendum would not generate any new significant impacts related to aesthetics; therefore, no new or modified mitigation measures are required.

### ***Conclusion***

Use of the site for recycled water storage and disposal would not be a substantial visual change compared to the current, disturbed land use. Proposed changes to the CLSP since certification of the 2004 EIR would not result in new significant impacts or substantially more severe impacts related to aesthetics. Temporary use of the CLSP area for recycled water storage and disposal was analyzed in the 2004 CLSP EIR. Use of different parcels for these purposes would not result in new or substantially more severe significant impact to the aesthetics of the project area. The combined analysis of aesthetics issues for the CLSP and the proposed project modifications evaluated in this addendum is sufficient to meet CEQA requirements and support the approval of the proposed project modifications, if the City of Lathrop so chooses.



Environmental Issue Area	Where Impact Was Analyzed in the 2004 Central Lathrop Specific Plan FEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the 2004 Central Lathrop Specific Plan FEIR Address/Resolve Impacts?
<b>2. Agriculture and Forestry Resources. Would the project:</b>					
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?	4.13-13	No	No	No	Yes
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	4.13-13 to 4.13-16	No	No	No	Yes
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	Not evaluated	No	No	No	N/A
d. Result in the loss of forest land or conversion of forest land to non-forest land?	Not evaluated	No	No	No	N/A
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?	4.13-16 to 4.13-17	No	No	No	Yes

## DISCUSSION

The 2004 CLSP EIR assumed conversion of all agricultural lands and cancelation of all Williamson Act contracts in the CLSP area. The proposed project modification would use sites within the CLSP for recycled water storage and disposal in the interim between the construction of Phase 1 and build out of the CLSP area. The 2004 CLSP EIR generally considered storage ponds, which would consist of relatively large areas (1 acre or greater) surrounded by earthen berms to contain/store recycled water when irrigation is not possible (i.e., during rain events), a conversion of the underlying agricultural land. The disposal sites would consist of irrigation of agricultural lands with recycled water and are considered a continuation of the existing use. Therefore, establishment of the recycled water disposal sites would not result in the conversion of additional agricultural land.

Since certification of the 2004 CLSP EIR, additional land within the CLSP has been converted to nonagricultural uses. This conversion was anticipated in the 2004 analysis and does not result in new impacts or warrant new analysis.

- a) All important farmland (i.e., Prime Farmland, Farmland of Statewide Importance, and Farmland of Local Importance) within the CLSP was assumed converted to nonagricultural, urban use in the 2004 CLSP EIR. Therefore, although approximately 40 acres of the CLSP area would be converted to nonagricultural use for the purpose of recycled water storage, this loss of farmland was fully analyzed in the 2004 CLSP EIR.
- b) Cancellation of all Williamson Act contracts was considered in the 2004 CLSP EIR, and has been implemented through much of the CLSP area (including the recycled water storage and disposal areas considered in this addendum) through a land exchange process (the topic of the first addendum to the CLSP EIR adopted in December 2005) and payment of necessary fees. It would not be necessary to complete any additional cancellations of Williamson Act contracts for recycled water storage and disposal considered in this addendum.
- c, d) Impacts to forest land were not addressed in the 2004 CLSP EIR. There is not forest land within the CLSP area, and no such land would be converted as a result of temporary wastewater storage or disposal. Therefore, no additional significant effects would occur as a result of the proposed changes.
- e) Recycled water disposal is consistent with agricultural use of the site and surrounding properties, and storage ponds would not result in conflicts with surrounding agricultural operations. During Phase 1 of project implementation, the temporary recycled water storage and disposal sites would be located in the buffer at the agriculture-urban interface. Because there would be a buffer between the new development and existing rural areas, there would be little to no potential for conflicts between agricultural practices and adjacent land owners.

## **Mitigation Measures**

As identified in the 2004 CLSP EIR, the project would have a significant and unavoidable impact on agricultural resources with respect to conversion of important farmland and conflict with Williamson Act Contracts despite implementation of Mitigation Measures 4.13-a and 4.13-b. Mitigation Measure 4.13-c would reduce impacts related to adjacent landowner/user conflicts to a less-than-significant level. No new agricultural impacts would result from the project modifications evaluated in this addendum, and no new mitigation measures are required. The following mitigation measures, included in the CLSP EIR, would apply to the project modifications evaluated in this addendum.

**4.13-a Conversion of Important Farmland.** The City would participate in the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP). Fees would be paid by the project applicant to the San Joaquin Council of Governments (SJCOG) on a per-acre basis for lost agricultural land during development of proposed CLSP and associated offsite utility infrastructure. The SJCOG will use these funds to purchase conservation easements on agricultural and habitat lands in the project vicinity (in the Central Index Zone identified in the SJMSCP). The preservation in perpetuity of agricultural lands through the SJMSCP, a portion of which would consist of Important Farmland, would ensure the continued protection of farmland in the project vicinity, partially offsetting project impacts.

Implementation of Mitigation Measure 4.13-a would substantially lessen significant impacts associated with the conversion of Important Farmland on the CLSP site and associated utility sites because funding conservation easements would provide assistance to public and private sectors in protecting other farmland from the pressures of development. The easements are purchased for land exhibiting benefits to wildlife, including a

combination of habitat, open space, and agricultural lands, so the compensation provided by the fee contribution for the proposed project would not be applied exclusively to agricultural lands. Therefore, fees contributed to the SJMSCP would only partially offset conversions of Important Farmland associated with project implementation. In addition, no new farmland would be made available, and the productivity of existing farmland would not be improved as a result of the SJMSCP mitigation. Therefore, full compensation for losses of Important Farmland would not be achieved. Impact 4.13-a is still considered a significant impact after mitigation.

**4.13-b Williamson Act Contract Cancellations.** Although all Williamson Act contracts in the CLSP area may be cancelled in a single cancellation, the project applicant shall continue to allow/promote farming operations as long as possible on portions of the CLSP plan area until an area is to be developed. This action would minimize impacts on agricultural production associated with the cancellation of Williamson Act contracts. In addition, the project applicant shall participate in the SJMSCP pursuant to Mitigation Measure 4.13-a. Fees would be paid to the SJCOG on a per-acre basis for agricultural lands converted to nonagricultural uses. The SJCOG uses these funds to purchase conservation easements on agricultural and habitat lands in the project vicinity (in the Central Index Zone identified in the SJMSCP). Participation in the SJMSCP would assist in compensating for Williamson Act contract cancellations by placing farmlands under conservation easements, requiring conservation of agricultural lands in perpetuity. These easements provide much more stringent and longer lasting protections than Williamson Act contracts. However, because easements are also purchased for land exhibiting benefits to wildlife, including a combination of habitat, open space, and agricultural lands, the overall farmland compensation provided by the fee contribution for the proposed project would not be applied exclusively to agricultural lands. Therefore, fees contributed to the SJMSCP would only partially offset the loss of agricultural lands under Williamson Act contract associated with the CLSP project. In addition, no new farmland would be made available. Therefore, full compensation for losses of Williamson Act contracts would not be achieved.

**4.13-c Adjacent Landowner/User Conflicts.** The project applicant shall phase the development of agricultural lands in the CLSP area in such a way as to avoid the fragmentation of continuing agricultural operations. As development occurs in the CLSP area, fencing, walls, or other suitable barriers shall be constructed or established at the interface between development and adjacent agricultural lands. In addition, a buffer zone or barrier, as determined by the City, shall be provided between the edge of residential or commercial development and the adjacent agricultural land. Roads, greenbelts, and similar facilities can function as these buffers. The City shall include the buffer as a condition of development approval, with the buffer being maintained until development of the adjacent agricultural land is initiated. Growers cultivating lands near or adjacent to urban development in the CLSP area can be expected to comply with all necessary federal, state, and local restrictions regarding buffers between pesticide/herbicide applications and sensitive areas, such as schools, residences, and parks. Required buffer distances may vary depending on the type of chemicals used and the method of application. Residents and other individuals purchasing property near agricultural lands shall be provided information on the types of conflicts that may occur and appropriate means to address these conflicts, consistent with the City's Right-to-Farm Ordinance.

The project modifications evaluated in this addendum would not generate new or more severe impacts to agriculture. Impacts to farmland would remain significant and unavoidable after implementation of Mitigation Measure 4.13-a. Implementation of Mitigation Measure 4.13-b would substantially lessen significant impacts associated with Williamson Act contract cancellations, although not sufficiently to reduce the impact to a less-than-significant level; however, as stated above, the cancellations have already occurred using the Williamson Act land exchange process. Impact 4.13-b is therefore still considered a significant impact after mitigation. Implementation of Mitigation Measure 4.13-c would reduce impacts associated with conflicts at the agricultural/urban interface to less-than-significant levels.

## **Conclusion**

Although many of the parcels proposed for temporary recycled water storage or disposal are or were farmland, the 2004 CLSP EIR addressed the conversion of this land to urban use, assuming all lands would be converted upon project initiation. The intermediary use of these parcels to store or dispose of recycled water would not result in any new impacts to agriculture not addressed in the 2004 CLSP EIR.

Environmental Issue Area	Where Impact Was Analyzed in the 2004 Central Lathrop Specific Plan FEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the 2004 Central Lathrop Specific Plan FEIR Address/Resolve Impacts?
<b>3. Air Quality. Would the project:</b>					
a. Conflict with or obstruct implementation of the applicable air quality plan?	4.5-20 to 4.5-21	No	No	No	Yes
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	4.5-15 to 4.5-16, 4.5-20 to 4.5-21	No	No	No	Yes
c. 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	4.5-15 to 4.5-16, 4.5-20 to 4.5-21	No	No	No	Yes
d. Expose sensitive receptors to substantial pollutant concentrations?	4.5-16 to 4.5-17	No	No	No	Yes
e. Create objectionable odors affecting a substantial number of people?	4.5-17 to 4.5-1	No	No	No	Yes

## DISCUSSION

Construction emissions would be generated from the development of recycled water storage ponds. Impacts to air quality, including from the temporary use of the plan area for recycled water storage and disposal were evaluated in the 2004 CLSP EIR. As originally described in the EIR, with implementation of mitigation measures the increase in regional criteria pollutants during construction would be a significant and unavoidable impact. The increase in stationary and mobile-source toxic air contaminants would also be a significant and unavoidable impact. Although stationary sources would be required to conform to permit conditions established by the San Joaquin County Air Pollution Control District, there is a theoretical potential that elements of the public could be exposed to levels of toxic air contaminants that would exceed the San Joaquin Valley Air Pollution Control District's significance thresholds. Increases in long-term regional emissions, primarily associated with mobile sources, would also remain significant and unavoidable. Implementation of the temporary recycled water storage and disposal facilities evaluated in this addendum would generation emissions consistent with those already evaluated in the 2004 CLSP EIR, as the construction and operations of temporary recycled water storage ponds and spray fields were considered in that document. Therefore, the conclusions regarding impact significance after mitigation would not change.

There are no new circumstances since certification on the CLSP EIR that would influence impacts to air quality associated with implementation of the CLSP or the proposed project modifications evaluated in this addendum, and there is no new information requiring analysis or verification.

- a, b, c)** Construction activities associated with the proposed project would result in generation of oxides of nitrogen (NO<sub>x</sub>), reactive organic gases, and particulate matter less than 10 micrometers in diameter (PM<sub>10</sub>). Violations of air pollutant standards for PM<sub>10</sub> and ozone are regularly recorded at monitoring stations in the project region.

Operation of the CLSP would result in increases in long-term regional emissions, primarily associated with mobile sources, which would exceed the San Joaquin Air Pollution Control District's recommended significant thresholds of 10 tons per year for ozone precursor pollutants reactive organic gases and NO<sub>x</sub>. San Joaquin County is currently considered a nonattainment area for the 8 Hour Ozone and particulate matter less than 2.5 micrometers in diameter standards (EPA 2013). Emissions would not increase with the modified location of the temporary recycled water storage and disposal sites as this activity is already considered and evaluated in the 2004 CLSP EIR.

- d)** Impacts to sensitive receptors were considered potentially significant in the 2004 CLSP EIR because the project would include light industrial and commercial land uses, but the locations of these facilities in relation to sensitive receptors was not known at the time of the analysis. The aspects of the project evaluated in this addendum do not include light industrial or commercial land uses and would not impact the potential for light industrial and commercial land uses to be located in proximity to sensitive receptors. Impacts to sensitive receptors from project implementation would remain significant and unavoidable.
- e)** Storage ponds and disposal areas for recycled water would have little potential to generate odors because the recycled water being stored and disposed of would be treated to tertiary levels and disinfected to meet Title 22 standards. Poor management of the recycled water storage ponds, allowing stagnation and eutrophication, is the only mechanism by which storage and disposal of recycled water would be anticipated to generate odors. Most treated water would be applied shortly after leaving the plant and would not be allowed to sit stagnant long enough to produce objectionable odors. Water held in storage ponds for extensive amounts of time would be mechanically aerated and mixed to maintain oxygen levels and avoid septic conditions. For these reasons, the 2004 CLSP EIR indicates that recycled water stored in storage ponds or sprayed onto nearby fields would have little potential to generate odors. This would also apply to the proposed temporary recycled water storage and disposal facilities evaluated in this addendum.

## ***Mitigation Measures***

No new significant air quality impacts would result from implementation of the proposed project description changes evaluated in this addendum, and no new mitigation measures are required. Of the following mitigation measures from the 2004 CLSP EIR, 4.5-a and 4.5-c would apply to the project activities evaluated in this addendum. Portions of mitigation measure 4.5-b may also apply.

**4.5-a: Increases in Regional Criteria Pollutants during Construction.** The San Joaquin Valley Air Pollution Control District (SJVAPCD) emphasizes implementation of effective and comprehensive control measures rather than requiring a detailed quantification of construction emissions. The SJVAPCD requires that all feasible control measures (dependent on the size of the construction area and the nature of the construction operations) shall be incorporated and implemented.

Based on available information, it appears that the application of standard construction mitigation measures for the control of fugitive dust (i.e., the application of water or soil stabilizers) are effective methods of reducing dust-related impacts on agricultural crops.

In accordance with SJVAPCD guidelines (SJVAPCD 1998), the following mitigation measures, which includes SJVAPCD Basic, Enhanced, and Additional Control Measures, shall be incorporated and implemented. In addition to the mitigation measures identified below, construction of the proposed project is required to comply with applicable SJVAPCD rules and regulations, including the requirement of a California Occupational Safety and Health Administration–qualified asbestos survey before demolition.

It is recognized that SJVAPCD Regulation VIII, upon which the following control measures are based, has recently undergone revision and that these control measures are subject to future periodic revision. Therefore, the project applicant shall annually contact the SJVAPCD to identify the most recent fugitive dust control measures required to be implemented by the proposed project and implement them accordingly during project construction.

- ▲ All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be effectively stabilized of dust emissions using water, chemical stabilizer/suppressant, or vegetative ground cover.
- ▲ All onsite unpaved construction roads and offsite unpaved construction access roads shall be effectively stabilized of dust emissions using water or chemical stabilizer/suppressant.
- ▲ All land clearing, grubbing, scraping, excavation, land leveling, grading, cut and fill, and demolition activities shall be effectively controlled of fugitive dust emissions utilizing application of water or by presoaking.
- ▲ During demolition of buildings all exterior surfaces of the building shall be wetted.
- ▲ When materials are transported offsite, all material shall be covered, effectively wetted to limit visible dust emissions, or at least 6 inches of freeboard space from the top of the container shall be maintained.
- ▲ All operations shall limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at least once every 24 hours when operations are occurring. (The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions. Use of blower devices is expressly forbidden.)
- ▲ Following the addition of materials to, or the removal of materials from, the surfaces of outdoor storage piles, piles shall be effectively stabilized of fugitive dust emissions utilizing sufficient water or chemical stabilizer/suppressant.
- ▲ Onsite vehicle speeds on unpaved roads shall be limited to 15 miles per hour.
- ▲ Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from adjacent project areas with a slope greater than 1 percent.
- ▲ Wheel washers shall be installed for all exiting trucks and equipment, or wheels shall be washed to remove accumulated dirt prior to leaving the site.
- ▲ Excavation and grading activities shall be suspended when winds exceed 20 miles per hour.
- ▲ The overall area subject to excavation and grading at any one time shall be limited to the fullest extent possible.
- ▲ Onsite equipment shall be maintained and properly tuned in accordance with manufacturers' specifications.
- ▲ When not in use, onsite equipment shall not be left idling.

In addition to the measures identified above, the following measures from Table 6-3 of the *Guide for Assessing and Mitigating Air Quality Impacts* shall be implemented:

- ▲ Install wind breaks at windward sides of construction areas. (This measure will be implemented if the City, in coordination with the SJVAPCD, determines that the fugitive dust control measures described above are not sufficiently effective.)
- ▲ Comply with the National Emission Standards for Hazardous Air Pollutants during the renovation/demolition of any existing buildings on the project site with the potential to contain asbestos. Consult the SJVAPCD's *Asbestos Compliance Assistance Bulletin*, dated December 1994, to ascertain whether individual structures on the project site are subject to National Emission Standards for Hazardous Air Pollutants.

The City, after consultation with the applicant, shall require all feasible additional measures to control construction emissions. Such measures may include, but are not limited to the following items from Table 6-4 of the *Guide for Assessing and Mitigating Air Quality Impacts* and other sources:

- ▲ Use alternative-fueled construction equipment, where reasonably available, such as equipment capable of using biodiesel or emulsified fuel.
- ▲ Limit the hours of operation of heavy-duty equipment and/or the amount of equipment in use at any one time.
- ▲ Replace fossil-fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set).
- ▲ Curtail construction during periods of high ambient pollutant concentration; this may include ceasing of construction activity during the peak hour of vehicular traffic on adjacent roadways (or ceasing/reducing heavy-duty equipment usage on Spare the Air Days).
- ▲ Before construction contracts are issued, the project applicant would perform a review of new technology, as it relates to heavy-duty equipment, to determine what (if any) advances in emissions reduction are available for use and are economically feasible. Construction contracts/bid specifications shall require contractors to utilize the available and economically feasible technology on an established percentage of the equipment fleet. It is anticipated that in the near future both NO<sub>x</sub> and PM<sub>10</sub> control equipment will be available. The SJVAPCD shall be consulted with on this process.

**4.5-b: Increases in Stationary and Mobile-Source Toxic Air Contaminants.** As indicated in the discussion of Impact 4.5-b, implementation of the proposed project would result in potentially significant increases in stationary-source and mobile-source toxic air contaminants (TACs) associated with Commercial and Office land use areas. The SJVAPCD shall impose various permitting conditions for stationary TAC sources. These conditions reflect the stringent application of air quality laws and substantially lessen the severity of potential impacts. However, as discussed above, even with implementation of permit conditions there is a theoretical potential that elements of the public could be exposed to levels of TACs that would exceed SJVAPCD significance thresholds. The only available mitigation to ensure no exposure of sensitive receptors to significant levels of TACs would be to completely separate emission sources from all sensitive receptor. However, many stationary TAC sources (gas stations, dry cleaners, auto repair facilities) are typically integrated with land uses containing sensitive receptors. Restricting the locations of all TAC generating facilities to specific areas would not be practical or economically feasible. Thus, implementing the proposed project would result in a significant and unavoidable adverse impact with respect to stationary-source TACs.

Mobile-source TACs are a relatively new concern for the California Air Resources Board (ARB), so specific guidelines and practices regarding assessing impacts and providing mitigation are not available. It is also unclear what effects the ARB's new diesel engine emission standards and diesel particulate matter regulations would have on the level of impact and the necessity for, or type of, mitigation. Therefore, the specific conditions of mobile-source TAC impacts cannot be determined at this time. The only available mitigation—completely



separating emission sources (diesel vehicles) from all sensitive receptor—is not feasible. Therefore, no feasible mitigation is available for Impact 4.5-b to reduce the impact to a less-than-significant level. Thus, implementing the proposed project would result in a significant and unavoidable adverse impact with respect to mobile-source TACs. The project applicant shall coordinate with the SJVAPCD as the project proceeds to assess situations in which toxic risk from diesel particulate matter may occur and to review methodologies that may become available to estimate the risk.

**4.5-c: Increases in Odorous Emissions.** The following mitigation measures shall be incorporated into the design and operation of the WRP #2 facility (**Note: Since publication of this mitigation measure in the CLSP EIR, plans for Water Recycling Plant #2 have been modified to incorporate it into a combined facility with the existing water recycling plant; now collectively referred to as the Lathrop Consolidated Treatment Facility [LCTF]. The term WRP #2 is retained in the text below since it reproduces the measure as it is presented in the CLSP EIR.**) and recycled water storage ponds to reduce potential emissions of airborne odors:

- ▲ Before final design, the City shall ensure that appropriate engineering controls have been incorporated into the design and construction of the proposed WRP #2 (**now part of the LCTF**) to minimize the production of unpleasant odors. Engineering controls to diminish odors could include, but would not be limited to, covering the headworks and/or perchlorinating at the headworks, using chemical additives to mask odors, installing systems (e.g., air scrubbers) to collect odorous air and remove unpleasant odors, and locating storage facilities (e.g., tanks, vaults, pipes, detention mechanisms) underground. Appropriate engineering controls to minimize odors shall also be incorporated into the design and construction of the recycled water storage ponds, such as aeration equipment and water circulation systems.
- ▲ During operation of WRP #2 and the recycled water storage ponds, the City shall ensure that engineering controls designed to avoid/suppress odors are functioning properly by periodically evaluating odor levels adjacent to the facilities. Should offensive odors be identified, the City shall take appropriate action to correct them to the extent practical.

Use of engineering controls and periodic monitoring would keep odors to a minimum. Detectable levels of odorous emissions at nearby residences would be expected to be similar to conditions near the existing water recycling plant, for which some odor complaints have been received by the City but none have been filed with the SJVAPCD. Therefore, with implementation of Mitigation Measure 4.5-c, odorous emissions generated by the recycled water storage ponds are considered a less-than-significant impact.

**4.5-e: Increases in Long-term Regional Emissions.** The City, after consultation with the applicant, shall require that all feasible emission control measures be incorporated into project design and operation. Such measures may include, but are not limited to, the following items recommended in the SJVAPCD Guide for Assessing and Mitigating Air Quality Impacts (SJVAPCD 1998) and other sources. It should be noted that many of these measures are already included in the proposed project design (as indicated in parenthetical notes below); however, they are repeated here to allow a complete listing of the SJVAPCD guidelines.

- ▲ Provide transit enhancing infrastructure that includes transit shelters, benches, street lightening, route signs and displays, and/or bus turnouts/bulbs (already incorporated into project design).
- ▲ Provide park and ride lots (one park and ride lot is already included in the project design).
- ▲ Provide pedestrian enhancing infrastructure that includes sidewalks and pedestrian paths, direct pedestrian connections, street trees to shade sidewalks, pedestrian safety designs/infrastructure, street furniture and artwork, street lightening, and/or pedestrian signalization and signs (already incorporated into the project design).

- ▲ Provide bicycle enhancing infrastructure that includes bikeways/paths connecting to a bikeway system, secure bicycle parking, and/or employee lockers and showers (bicycle lanes and trails already incorporated into the project design).
- ▲ Use solar, low-emissions, central, or tankless water heaters (residential and commercial), increase wall and attic insulation beyond Title 24 requirements (residential and commercial), orient buildings to take advantage of solar heating and natural cooling and use passive solar designs (residential, commercial, and industrial), replace wood-burning stoves and fireplaces with gas-fired fireplaces or inserts.
- ▲ Deciduous trees should be planted on the south-facing and west-facing sides of buildings.
- ▲ Natural gas lines and electrical outlets should be installed in patio areas to encourage the use of gas and/or electric barbecues.
- ▲ Businesses or individuals shall be allowed, through the zoning and building permit process, the option of installing electric/natural gas fuel hookups.
- ▲ If a gasoline service station is developed as part of the proposed project, it is encouraged that natural gas fueling be incorporated as part of the station.
- ▲ The project applicant shall develop and implement a program to encourage employers to promote the use of low-emission vehicles, thus providing emission reductions. The program may include financial incentives, preferred parking, or other benefits for employees and businesses that use low-emission vehicles.
- ▲ The City shall encourage the project applicant to develop/participate in a program to provide, or subsidize the purchase cost of electric lawnmowers and electric edgers for project homeowners.

## **Conclusion**

Air quality impacts were considered significant and unavoidable in the 2004 CLSP EIR. The modified location of temporary recycled water storage and disposal sites would not result in any new or substantially more severe significant environmental effects. The combined analysis of air quality issues for the CLSP and the proposed project modifications in this addendum is sufficient to meet CEQA requirements and support the approval of the proposed project modifications, if the City of Lathrop so chooses.

Environmental Issue Area	Where Impact Was Analyzed in the 2004 Central Lathrop Specific Plan FEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the 2004 Central Lathrop Specific Plan FEIR Address/Resolve Impacts?
<b>4. Biological Resources. Would the project:</b>					
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?	4.14-22 to 4.14-29, 4.15-20 to 4.15-23	No	No	No	Yes
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	4.14-30, 4.15-21 to 4.15-22	No	No	No	No
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	4.14-22, 4.14-30	No	No	No	No
d. Interfere substantially with the movement of any native resident or migratory fish and wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	4.14-30	No	No	No	No
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	Not evaluated	No	No	No	N/A
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?	4.14-22, 4.14-30	No	No	No	No

## DISCUSSION

As identified in the 2004 CLSP EIR, the CLSP would result in less-than-significant impacts to western pond turtle, Canada goose, sandhill crane, colonial nesting birds, avian species of concern, special-status bats, and stormwater discharge. Impacts to special-status plants, valley elderberry longhorn beetle, giant garter snake, Swainson's hawk, burrowing owl, ground and streamside nesting birds, birds nesting in trees in and out of riparian habitat, common raptors, sensitive habitats, wildlife corridors, and construction on the river side of the levee would be less than significant with implementation of identified mitigation measures. Impacts to riparian brush rabbit would be significant and unavoidable. However, potential and occupied habitat for riparian brush rabbit is on the water side of the San Joaquin River levee and none is located within the 12 parcels considered for the proposed recycled water storage and disposal sites. No new biological resources impacts would result from the project modifications evaluated in this addendum, as the 12 parcels were already evaluated in the EIR for conversion to urban development.

There are no new circumstances since certification on the CLSP EIR that would influence impacts to biological resources associated with the CLSP or the proposed project modifications evaluated in this addendum, and there is no new information requiring analysis or verification.

- a) The 2004 CLSP EIR addressed habitat conversion throughout the CLSP area, including the 12 parcels proposed for temporary recycled water storage and disposal. Implementation of the CLSP would result in the removal of approximately 15 acres of freshwater emergent wetland, cottonwood riparian forest, and riparian scrub in the CLSP area. Removal of these habitats could result in the loss of eight special-status plants that have potential to occur in these types of habitat. Significant impacts could also occur to valley elderberry longhorn beetle, giant garter snake, Swainson's hawk, burrowing owl, ground-nesting or streamside/lakeside-nesting birds, birds nesting in isolated trees or shrubs outside of riparian habitat and birds nesting along riparian corridors, common raptors, riparian brush rabbit, and fisheries. The proposed recycled water storage and disposal facility locations evaluated in this addendum are within the CLSP planned development area, and the effects of development on these sites on biological resources were addresses in the 2004 CLSP EIR. Temporarily placing recycled water storage and disposal facilities on the 12 parcels, then removing these facilities and developing urban uses on the site, would not increase overall effects on biological resources and there would be no new impacts.
- b, c) The 2004 CLSP EIR identified the 12 parcels under consideration for temporary recycled water storage and disposal as cropland and park/residential land use (see Exhibit 4.14-1 of the CLSP EIR). Therefore, the proposed project modification would not have a substantial adverse effect on any riparian habitat, wetlands, or other sensitive natural community.
- d) The portion of the San Joaquin River and associated habitats within the CLSP area provide a movement corridor for a variety of terrestrial wildlife species, but vegetation along this portion of the river is relatively limited and fragmented. The area is not known to support any wildlife nursery sites. The proposed project modifications are 200 feet from the landside of the river levee at the closest point and the easternmost parcels are as far as 6,000 feet away. Proposed recycled water storage and disposal facilities would not alter the project elements near the San Joaquin River and would not have the potential to impact this movement corridor.
- e) As identified in the 2004 CLSP EIR, San Joaquin County Ordinance 3675, Chapter 9-1505 includes requirements for development projects pertaining to Native Oak Trees, Heritage Oak Trees, and Historical Trees. The code provides guidelines for removal, replacement, development constraints, and landscaping. Since the CLSP area is now within the limits of the City of Lathrop, the county ordinance no longer applies. The City of Lathrop does not have similar policies or ordinances or other policies or

ordinances protecting biological resources that would be applicable to the activities evaluated in this addendum.

The proposed project modifications would not conflict with any local policies or ordinances protecting biological resources.

- f) The biological resources section discusses species listed in the SJCMHCP. The SJMSCP does not identify the CLSP area as a preferred conservation site. Therefore, development in the CLSP area would not conflict with SJMSCP conservation goals. The proposed recycled water storage and disposal facility locations evaluated in this addendum are within the CLSP planned development area already evaluated in the 2004 CLSP EIR, and there would be no additional potential for conflict with the SJCMSHP. In addition, the project would continue to participate in the SJSMSHP, as stated in the 2004 CLSP EIR.

## ***Mitigation Measures***

The following mitigation measures from the 2004 CLSP EIR would apply to the project modifications evaluated in this addendum.

**4.14-b Special-Status Plants.** The following is a summary and clarification of SJMSCP incidental take avoidance and minimization measures for special-status plants:

(1) Before project construction, surveys for the special-status plants listed in Table 4.14-1 shall be conducted by a qualified botanist at the appropriate time of year when the target species would be in flower or otherwise clearly identifiable. Surveys shall be conducted in accordance with specific methodologies described in Section 5.2.2.5 of the SJMSCP.

(2) If special-status plants are found, the following measures shall be implemented:

a. Sanford's arrowhead, Delta button-celery, and slough thistle: The SJMSCP requires complete avoidance for these species; therefore, potential impacts on these species could not be covered through participation in the plan. If these species are present in the project area and cannot be avoided, a mitigation plan shall be developed, with review and input from the regulatory agencies (e.g., California Department of Fish and Wildlife [CDFW]). The mitigation plan shall identify mitigation measures for any populations affected by the project, such as creation of offsite populations through seed collection or transplanting, preserving and enhancing existing populations, or restoring or creating suitable habitat in sufficient quantities to compensate for the impact. All mitigation measures that the City determines through this consultation to be necessary shall be implemented by the project proponent. These measures shall be designed to ensure that the proposed project does not result in a net reduction in the population size or range of Delta button-celery.

b. Mason's lilaeopsis, rose mallow, Suisun Marsh aster, and Delta tule pea: These species are considered widely distributed species by the SJMSCP, and dedication of conservation easements is the preferred option for mitigation. If these species are found in the project area, the possibility of establishing a conservation easement shall be evaluated. If dedication of a conservation easement is not a feasible option, payment of SJMSCP development fees may be used to mitigate impacts on these species. Use of conservation easements or development fees for establishment of habitat preserves, or a combination of the two mechanisms, shall be sufficient to avoid an overall net reduction in the population size or range of Mason's lilaeopsis.

c. Wright's trichocoronis: This species is considered a narrowly distributed species by the SJMSCP, and dedication of conservation easements is the preferred option for mitigation. If this species is found in the project area, the possibility of establishing a conservation easement shall be evaluated. If dedication of a conservation easement is not an option, the SJMSCP requires a consultation with the permitting agency representatives on the Technical Advisory Committee to determine the appropriate mitigation measures. These may include seed collection or other measures and would be determined on a population basis, taking into account the species type, relative health, and abundance. After the appropriate mitigation has been determined, it shall be implemented by the project proponent.

**4.14-c Valley Elderberry Longhorn Beetle.** The following is a summary and clarification of SJMSCP incidental take avoidance and minimization measures for valley elderberry longhorn beetle (VELB):

- (1) Before project construction, a survey shall be conducted in areas where elderberry shrubs could occur within 50 feet of construction areas, including along the banks of the San Joaquin River and along the levee.
- (2) For all shrubs that are to be retained on the project site, a setback of 20 feet from the dripline of each elderberry shrub found during the survey shall be established. Brightly colored flags or fencing shall be used to demarcate the 20-foot setback area and shall be maintained until project construction in the vicinity is complete. No construction activities shall occur within the setback area.
- (3) For all shrubs without evidence of VELB exit holes that cannot be retained on the project site, all stems of 1 inch or greater in diameter at ground level shall be counted. Compensation for removal of these stems shall be provided in SJMSCP preserves as provided in SJMSCP Section 5.5.4(B). This is designed to avoid a net reduction in the number of VELB by requiring establishment of three new plants for each stem over 1 inch in diameter that would be removed.
- (4) All shrubs with evidence of VELB exit holes or other evidence of VELB occupation that cannot be retained in the project area shall be transplanted to VELB mitigation sites during the dormant period for elderberry shrubs (November 1 to February 15). For elderberry shrubs displaying evidence of VELB occupation that cannot be transplanted, compensation for removal of shrubs shall be provided in accordance with SJMSCP Sections 5.5.4(B and C). This is designed to avoid a net reduction in the number of VELB by requiring establishment of six new plants for each stem over 1 inch that displays evidence of VELB occupation but cannot be transplanted.

**4.14-d Giant Garter Snake.** The SJMSCP requires full avoidance of known occupied giant garter snake habitat. Based on the low quality of habitat in the CLSP area, giant garter snake is not expected to be present. However, if giant garter snake is discovered in the CLSP area, a separate consultation with the United States fish and Wildlife Service (USFWS) under the Federal Endangered Species Act and with CDFW under the California Endangered Species Act may be required. The following is a summary of SJMSCP and USFWS incidental take avoidance and minimization measures for giant garter snake:

- (1) Construction within 200 feet of suitable aquatic habitat for giant garter snake shall occur during the active period for the snake, between May 1 and October 1. Between October 2 and April 30, the Joint Powers Authority, with the concurrence of the permitting agencies' representatives on the Technical Advisory Committee, shall determine whether additional measures (e.g., daily presence/absence surveys, exclusion fencing) are necessary to minimize and avoid take.

- (2) Preconstruction surveys for the giant garter snake shall be conducted within 24 hours of ground disturbance.
- (3) Vegetation clearing within 200 feet of the banks of potential giant garter snake aquatic habitat shall be limited to the minimal area necessary.
- (4) The movement of heavy equipment within 200 feet of the banks of potential giant garter snake aquatic habitat shall be confined to existing roadways as much as practicable to minimize habitat disturbance.
- (5) Before ground disturbance, all onsite construction personnel shall be given instruction regarding the presence of the giant garter snake and the importance of avoiding impacts on this species and its habitats.
- (6) In areas where wetlands, irrigation ditches, or other potential giant garter snake habitats are being retained on the site and are within 200 feet of an active construction area:
  - a. Temporary fencing or other obvious markers shall be installed around potential garter snake habitat;
  - b. Working areas, spoils and equipment storage, and other project activities shall be restricted to areas outside of potential garter snake habitat; and
  - c. Water quality shall be maintained and construction runoff into wetland areas shall be limited through the use of hay bales, filter fences, vegetative buffer strips, or other accepted equivalents.

Other provisions of the USFWS Standard Avoidance and Minimization Measures during Construction Activities in Giant Garter Snake Habitat (USFWS 1997) shall be implemented (excluding programmatic mitigation ratios, which are superseded by the SJMSCP's mitigation ratios).

**4.14-f Swainson's Hawk.** The following is a summary and clarification of SJMSCP incidental take avoidance and minimization measures for Swainson's hawk:

- (1) If the project proponent elects to remove nest trees, then nest trees shall be removed between September 1 and February 15, when the nests are unoccupied.
- (2) If the project proponent elects to retain a tree with an active nest, all construction activities shall remain a distance of two times the dripline of the tree, measured from the nest. This setback shall be maintained during the nesting season for the period encompassing nest building and continuing until fledglings leave the nest. Setbacks shall be marked by brightly colored temporary fencing or other obvious markers.

**4.14-h Burrowing Owl.** The following is a summary and clarification of SJMSCP incidental take avoidance and minimization measures for burrowing owl:

- (1) Burrowing owls may be discouraged from entering or occupying construction areas by discouraging the presence of ground squirrels. To accomplish this, the project proponent could prevent ground squirrels from occupying the project site by employing one of several methods outlined in Section

5.2.4.15 of the SJMSCP. These include retention of tall vegetation, regular disking of the site, or use of chemicals or traps to kill ground squirrels.

(2) Preconstruction surveys for burrowing owls shall be conducted within 75 meters of areas of project activity in locations with potential burrow habitat, including field edges, roadsides, levees, and fallow fields. Actively farmed agricultural fields and regularly disked or graded fields do not provide suitable burrow sites and need not be surveyed. The survey shall be conducted within 1 week before the beginning of construction. If burrowing owls are found, the following measures shall be implemented:

a. During the nonbreeding season (September 1 through January 31), burrowing owls occupying the project site shall be evicted from the project site by passive relocation as described in the CDFW's 1995 Staff Report on Burrowing Owls.

b. During the breeding season (February 1 through August 31), occupied burrows shall not be disturbed and shall be provided with a 75-meter protective buffer until and unless the Technical Advisory Committee, with the concurrence of the permitting agencies' representatives on the Technical Advisory Committee, or a qualified biologist approved by the permitting agencies, verifies through noninvasive means that either (1) the birds have not begun egg laying or (2) juveniles from the occupied burrows are foraging independently and are capable of independent survival. After the fledglings are capable of independent survival, the burrow can be destroyed.

**4.14-j Ground-Nesting or Streamside/Lakeside-Nesting Birds.** The following is the SJMSCP incidental take avoidance and minimization measure for northern harrier:

A setback of 500 feet from northern harrier nesting areas shall be established and maintained during the nesting season for the period encompassing nest building and continuing until fledglings leave nests. This setback applies whenever construction or other ground-disturbing activities must begin during the nesting season in the presence of nests that are known to be occupied. Setbacks shall be marked by brightly colored temporary fencing.

**4.14-k Birds Nesting in Isolated Trees or Shrubs Outside of Riparian Habitat.** The following is the SJMSCP incidental take avoidance and minimization measure for loggerhead shrike:

A setback of 100 feet from loggerhead shrike nesting areas shall be established and maintained during the nesting season for the period encompassing nest building and continuing until fledglings leave nests. This setback applies whenever construction or other ground-disturbing activities must begin during the nesting season in the presence of nests that are known to be occupied. Setbacks shall be marked by brightly colored temporary fencing.

**4.14-l Birds Nesting along Riparian Corridors.** The following are SJMSCP incidental take avoidance and minimization measures for white-tailed kite:

(1) Preconstruction surveys shall be conducted to investigate all potential nesting trees on the project site (e.g., especially tree tops 15-59 feet above the ground in oak, willow, eucalyptus, cottonwood, or other deciduous trees), during the nesting season (February 15 to September 15), whenever white-tailed kites are noted on or in the vicinity of the site during the nesting season

(2) A setback of 100 feet from white-tailed kite nesting areas shall be established and maintained during the nesting season for the period encompassing nest building and continuing until fledglings leave nests.



This setback applies whenever construction or other ground disturbing activities must begin during the nesting season in the presence of nests that are known to be occupied. Setbacks shall be marked by brightly colored temporary fencing.

**4.14-o Common Raptors.** The following measures are designed to avoid loss of common tree-nesting raptors:

(1) If project activity would occur during the raptor nesting season (February 15 through September 15), preconstruction surveys shall be conducted during the nesting season in suitable nesting habitat within 100 feet of areas of project activity. Large trees throughout the project area provide suitable habitat. The survey shall be conducted within 1 week before the beginning of construction or tree removal.

(2) A setback of 100 feet from nesting areas shall be established and maintained during the nesting season for the period encompassing nest building and continuing until fledglings leave nests. This setback applies whenever construction or other ground-disturbing activities must begin during the nesting season in the presence of nests that are known to be occupied. Setbacks shall be marked by brightly colored temporary fencing.

**4.14-q Riparian Brush Rabbit.** The SJMSCP requires full avoidance of riparian brush rabbit habitat in areas of known occupied habitat. No conversion of occupied habitat or mortality to individual riparian brush rabbits is allowed under the SJMSCP. For the proposed project to qualify for coverage under the SJMSCP for riparian brush rabbit, a permanent setback of 300 feet from the outer edge of the dripline of riparian vegetation would be required. Because maintenance of such setbacks may not be feasible, a separate consultation with USFWS under the Federal Endangered Species Act and with CDFW under California Endangered Species Act would be conducted, and an Incidental Take Permit would be required. These actions would be separate from the SJMSCP and would require project-specific authorization and permitting. Specific mitigation measures would be developed during the consultation process.

Because the limited habitat within the CLSP area is not expected to support a viable long-term population of riparian brush rabbits, it may be most appropriate to provide offsite mitigation for adverse effects on occupied habitat. Potential measures to avoid direct take of individuals may include, but would not be limited to, conducting preconstruction surveys, conducting daily surveys of construction areas, installing exclusion fencing to prevent brush rabbits from entering construction areas, and allowing trapping of riparian brush rabbits at the project site in support of the USFWS captive breeding program to establish new populations in appropriate habitat. These measures to minimize direct take in conjunction with compensation for adverse effects are anticipated to avoid a net reduction in the number of riparian brush rabbits. However, the potential loss of riparian brush rabbit population on the project site could restrict the range of this species because it is currently the northernmost known extent of the population.

**4.14-r Sensitive Habitats.** The following measures are designed to minimize and mitigate impacts on jurisdictional waters of the United States and riparian habitat:

(1) Before project implementation, a delineation of waters of the United States, including wetlands that would be affected by the proposed project shall be made by qualified biologists through the formal Section 404 wetland delineation process. The delineation shall be submitted to and verified by the United States Army Corps of Engineers (USACE).

(2) If, based on the verified delineation, it is determined that fill of waters of the United States would result from CLSP implementation, authorization for such fill shall be secured from USACE through the Section 404 permitting process.

(3) A CDFW Streambed Alteration Agreement and Regional Water Quality Control Board (RWQCB) water quality certification are also expected to be required for work within existing levees along the San Joaquin River and may be required for fill of agricultural ditches.

(4) The acreage of waters of the United States and riparian habitat that would be removed shall be replaced or restored/enhanced on a “no net loss” basis in accordance with USACE and CDFW regulations and Development Title 9-1505. Habitat restoration, enhancement, and/or replacement shall be at a location and by methods agreeable to USACE and CDFW, as determined during the permitting processes for CWA Section 404 and California Fish and Game Code Section 1602.

(5) Measures to minimize erosion and runoff into the San Joaquin River shall be included in all drainage plans. Appropriate runoff controls such as berms, storm gates, detention basins, overflow collection areas, filtration systems, and sediment traps shall be implemented to control siltation and the potential discharge of pollutants.

## **Conclusion**

Potential impacts to biological resources were fully addressed in the 2004 CLSP EIR. The combined analysis of biological resource issues in the CLSP EIR and the proposed project modifications evaluated in this addendum is sufficient to meet CEQA requirements and support the approval of the proposed project modifications, if the City of Lathrop so chooses.

Environmental Issue Area	Where Impact Was Analyzed in the 2004 Central Lathrop Specific Plan FEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the 2004 Central Lathrop Specific Plan FEIR Address/Resolve Impacts?
<b>5. Cultural Resources. Would the project:</b>					
a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	4.16-15	No	No	No	No
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	4.16-15	No	No	No	Yes
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	4.17-8 to 4.17-9	No	No	No	Yes
d. Disturb any human remains, including those interred outside the formal cemeteries?	4.16-16	No	No	No	Yes

## DISCUSSION

The 12 parcels addressed in this addendum were evaluated for potential cultural resources impacts in the 2004 CLSP EIR. There are no new circumstances or information that would influence the cultural resources conclusions contained in the 2004 CLSP EIR.

- a) Removal of structures within the CLSP area was evaluated in the 2004 CLSP EIR. The 2004 CLSP EIR determined that none of these structures were eligible for listing on the California Register of Historical Resources.
- b) The parcels under evaluation do not include recorded archaeological sites, as identified in the 2004 CLSP EIR. As-yet-undiscovered or unrecorded cultural resource sites may be uncovered by project construction activities (especially in any areas that were inaccessible for survey during preparation of the 2004 CLSP EIR). The potential exists for previously unidentified archaeological sites to be identified during preconstruction or construction-related ground disturbing activities. However, the 2004 CLSP EIR evaluates development of the 12 parcels addressed in this addendum and potential use for temporary recycled water storage ponds and spray fields does not change the potential to encounter as-yet-undiscovered or unrecorded cultural resources sites.
- c) There are no previously recorded fossil sites in the CLSP area. However, a large portion of the CLSP area (including many of the 12 parcels proposed for temporary use as recycled water storage and disposal sites) is located within sediments of the Modesto Formation, which is a paleontologically sensitive rock unit under the Society of Vertebrate Paleontology guidelines. Therefore, earth-moving activities could adversely affect paleontological resources. However, temporary use of the 12 parcels for recycled water storage ponds and spray fields does not change the potential for this impact.
- d) Although no human remains have been listed or recorded in the project area, they are known to occur in the project vicinity. As-yet-undiscovered archaeologically significant human remains may be

uncovered by project construction activities. However, temporary use of the 12 parcels for recycled water storage ponds and spray fields, in locations already evaluated for development in the CLSP EIR, does not change the potential for this impact.

## **Mitigation Measures**

The mitigation measures presented in the 2004 CLSP EIR would reduce impacts to recorded archaeological sites, undiscovered/unrecorded archaeological sites, undiscovered/unrecorded archaeologically significant human remains, and disturbance of paleontological resources to a less-than-significant level. As identified in the 2004 CLSP EIR, the project would have a less-than-significant impact on historic properties. No new cultural resources impacts would result from the project modifications evaluated in this addendum, and no new mitigation measures are required. The following mitigation measures would apply to the project modifications evaluated in this addendum.

**4.16-a Recorded Archaeological Sites.** The northern portions of potential recycled water storage/disposal Area 6 may include a portion of site CA-SJO-3, a prehistoric site found eligible for listing on the National Register of Historic Places and California Register of Historical Resources. Intact portions of this site have been found below the I- 5/State Route 120 interchange embankment and additional portions may extend to the south. Therefore, project-related subsurface disturbances should be avoided in this area. It is recommended that Area 6 be utilized for a sprayfield only. If any subsurface disturbances are required to turn this area into a sprayfield, those disturbances shall be monitored by a qualified professional archaeologist.

If project planning calls for construction of any facilities other than a sprayfield for Area 6, then the City shall retain a qualified professional archaeologist to conduct Phase II testing at site CASJO- 3 to confirm whether site CA-SJO-3 extends into Area 6, the boundary of site CA-SJO-3 in Area 6 (if it extends into this area), and the significance of any resources related to site CA-SJO-3 that may occur in Area 6. The investigations shall be conducted before construction begins at this site. If any archaeological resources found in Area 6 are concluded by the archaeologist to represent deposits from site CA-SJO-3, the archaeologist shall recommend additional actions deemed necessary for the protection of these resources. Such actions may include additional testing, data recovery, mapping, capping, or avoidance of the resource. The City will be responsible for approval of recommended mitigation as it deems appropriate. The City shall ensure that approved protection actions (if needed) are implemented before construction begins at this site.

**4.16-c Undiscovered/Unrecorded Archaeological Sites.** Before the initiation of construction or ground-disturbing activities associated with the proposed project, the parcels that have not been surveyed during previous efforts shall be plowed or disked, or the soil surface otherwise exposed as necessary, and surveyed by a qualified professional archaeologist. If any unique archaeological resources or historical resources are found, they will be treated in a manner consistent with the impact evaluation and mitigation measures provided in this section.

At the onset of construction, all construction personnel shall be alerted to the possibility of buried cultural resources. If artifacts or unusual amounts of stone, bone, or shell are uncovered during construction activities, work within 50 feet of the specific construction site at which the suspected resources have been uncovered shall be suspended, and the City of Lathrop Community Development Department/Planning Division shall be immediately contacted. At that time, the City or the project proponent shall retain a qualified professional archaeologist who shall conduct a field investigation of the specific site and recommend mitigation deemed necessary for the protection or recovery of any cultural resources concluded by the archaeologist to represent historical resources or unique archaeological resources. The City will be responsible for approval of recommended mitigation as it deems appropriate. The City or the project proponent shall implement the approved mitigation before the resumption of construction activities at the construction site.

**4.16-d Undiscovered/Unrecorded Human Remains.** If human remains are discovered at any project construction sites during any phase of construction, work within 50 feet of the remains shall be suspended immediately, and the City of Lathrop Community Development Department/Planning Division and the county coroner shall be immediately notified. If the remains are determined by the county coroner to be Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. The City or the project proponent shall also retain a qualified professional archaeologist with Native American burial experience who shall conduct a field investigation of the specific site and consult with the Most Likely Descendant, if any, identified by the NAHC who responds in timely manner (i.e., within 24 hours after being notified by NAHC). As necessary, the archaeologist may provide professional assistance to the Most Likely Descendant including the excavation and removal of the human remains. The City will be responsible for approval of recommended mitigation as it deems appropriate, taking account of the provisions of state law, as set forth in State CEQA Guidelines §§15064.5(e) and Public Resources Code §§5097.98. The City or the project proponent shall implement approved mitigation before the resumption of activities at the site where the remains were discovered.

**4.17-a: Disturbance of Paleontological Resources During Earth-Moving Activities.** For earthmoving activities in the paleontologically sensitive areas identified in Exhibit 4.17-1, the project applicant shall implement the following measures:

(1) Before the start of construction activities, construction personnel involved with earth-moving activities shall be informed of the possibility of encountering fossils, the appearance and types of fossils likely to be seen during construction activities, and proper notification procedures should fossils be encountered. This worker training shall be prepared and presented by a qualified paleontologist.

(2) If paleontological resources are discovered during earth-moving activities, the construction crew shall immediately cease work in the vicinity of the find. The City or the project applicant shall retain a qualified paleontologist to evaluate the resource and prepare a proposed mitigation plan in accordance with Society of Vertebrate Paleontology guidelines (1995). The proposed mitigation plan may include a field survey, construction monitoring, sampling and data recovery procedures, museum storage coordination for any specimen recovered, and a report of findings. Recommendations determined by the City to be necessary and feasible shall be implemented by the project applicant before construction activities can resume at the site where the paleontological resources were discovered.

## **Conclusion**

The potential for the CLSP to impact paleontological, archaeological, and historic resources was evaluated in the 2004 CLSP EIR. The proposed use of portions of the CLSP area for temporary recycled water storage and disposal would not affect the project's potential to impact as-yet-undiscovered archaeologically significant human remains, archaeological sites, or paleontological resources. The combined analysis of cultural resource issues in the CLSP EIR and the proposed project modifications evaluated in this addendum is sufficient to meet CEQA requirements and support the approval of the proposed project modifications, if the City of Lathrop so chooses.

Environmental Issue Area	Where Impact Was Analyzed in the 2004 Central Lathrop Specific Plan FEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the 2004 Central Lathrop Specific Plan FEIR Address/Resolve Impacts?
<b>6. Energy and Natural Resources. Would the project result in:</b>					
a. Substantial increase in demand for existing energy sources, or conflict with adopted policies or standards for energy use?	4.11-28 to 4.11-29	No	No	No	No
b. Use of non-renewable resources in a wasteful and inefficient manner?	Not evaluated	No	No	No	N/A
c. Loss of significant mineral resources sites designated in the Countywide Plan from premature development or other land uses which are incompatible with mineral extraction?	4.7-19	No	No	No	Yes

**DISCUSSION**

Pacific Gas and Electric Company (PG&E) currently provides electrical service to the CLSP area via a number of transmission lines, including lines along Manthey Road, De Lima Road, and Dos Reis Road. PG&E would continue to be the electrical service provider for the CLSP project, delivering power via connections to existing main electrical feeder lines in the developed portion of the City east of I-5. As the plan area is developed, all existing aboveground electrical lines would be relocated underground. All new power lines in the CLSP area would also be installed underground.

There are no new circumstances since certification on the CLSP EIR that would influence impacts to energy and natural resources associated with the CLSP or the proposed project modifications evaluated in this addendum, and there is no new information requiring analysis or verification. Demand for electricity and natural gas would remain a less-than-significant impact, as determined in the 2004 CLSP EIR. The 2004 CLSP EIR determined that the impact to mineral resources would be potentially significant because offsite recycled water storage and disposal processes could be located in areas that have mineral resources. The proposed project modification would not occur in an area with mineral resources.

- a) The energy demands created by the CLSP development would not be considered substantial in relation to the quantity of energy supplied by PG&E. PG&E has acknowledged that it has adequate electricity and natural gas supplies to support the project without affecting service to existing customers. The temporary development of recycled water storage ponds and spray fields on the 12 parcels would not alter this conclusion.
- b) The proposed project modifications would not result in the wasteful or inefficient use of resources, although the minimal electricity required could be generated by nonrenewable sources. Further, the project is designed to promote the efficient use of water. There would be a less-than-significant impact associated with use of non-renewable resources.

- c) The 12 parcels proposed for temporary recycled water storage and disposal are located in Mineral Resource Zone 1, which are areas where adequate information indicates that no significant mineral deposits are present or where it is judged that little likelihood exists for their presence. Implementation of the project modifications evaluated in this addendum would not result in the loss of significant mineral resources sites.

### ***Mitigation Measures***

### ***Conclusion***

The combined analysis of energy and natural resource issues in the CLSP EIR and the proposed project modifications evaluated in this addendum is sufficient to meet CEQA requirements and support the approval of the proposed project modifications, if the City of Lathrop so chooses.

Environmental Issue Area	Where Impact Was Analyzed in the 2004 Central Lathrop Specific Plan FEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the 2004 Central Lathrop Specific Plan FEIR Address/Resolve Impacts?
<b>7. Geology and Soils. Would the project:</b>					
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: <ul style="list-style-type: none"> <li>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.</li> <li>ii. Strong seismic ground shaking?</li> <li>iii. Seismic-related ground failure, including liquefaction?</li> <li>iv. Landslides?</li> </ul>	4.7-17 to 4.7-19	No	No	No	Yes
b. Result in substantial soil erosion or the loss of topsoil?	4.7-17	No	No	No	N/A
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?	4.7-18 to 4.7-19	No	No	No	Yes
d. Be located on expansive soil, as defined in Table 18- 1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	4.7-19	No	No	No	Yes
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	Not evaluated	No	No	No	N/A



## DISCUSSION

The CLSP is located in the northern portion of the San Joaquin Valley, in an area that is characteristically flat. Soils in the CLSP area are alluvial (i.e., were deposited by water). The classifications of soil on the parcels under evaluation include Dello clay loam, Grangeville clay loam, Tinnin loamy coarse sand, and Timor loamy sand.

There is a potential for strong ground shaking in the CLSP area as a result of seismic activity. Although the project area would not likely experience a fault rupture, ground shaking could cause structural damage to levees, buildings, pipelines, recycled water storage ponds, and other permanent developments proposed as part of the project. Soils most susceptible to liquefaction are clean, loose, saturated, uniformly graded fine sands below the groundwater table. The project site has some areas of saturated, sandy soil layers that could liquefy when subjected to an earthquake with 0.3 horizontal ground motion due to gravity (g) as predicted by the 10 percent probability of exceedance in 50 years. The predominant liquefaction potential was observed in the upper 5 to 15 feet below the ground surface. Lateral spreading and landsliding are unlikely to occur in the CLSP area because the interior of the site is flat and the levees at the western project boundary have been constructed and improved to remain stable.

The use of the CLSP property for temporary recycled water storage and disposal, and the 12 parcels now under evaluation for that purpose, are evaluated in the 2004 CLSP EIR. Impacts associated with soil erosion would continue to be less than significant without the requirement for mitigation. Impacts associated with ground shaking, shrink-swell, and liquefaction potential would be less than significant after implementation of mitigation measures. There has not been a change in circumstances since certification of the CLSP EIR that would influence geology, soils, and mineral resources impacts associated with the temporary storage or disposal of recycled water in the CLSP area evaluated in this addendum.

- a, c)** In general, the CLSP project site is characterized as having relatively high groundwater and areas of potentially liquefiable sands. Liquefaction-induced ground settlement may be approximately 2 to 4 inches as a result of a 0.3g earthquake event. Damage to recycled water storage ponds caused by seismic activity could result in a secondary hazard of localized flooding. In the event of a failure of a recycled water storage pond due to ground shaking, more than 10 acre-feet of water could be rapidly released. This potential was addressed in the 2004 CLSP EIR with Mitigation Measure 4.7-b.
- b)** The soils present on the 12 parcels identified for temporary recycled water storage and disposal have a low potential for water erosion. The clay loams also have a low potential for wind erosion, while the sands have a high potential for erosion as a result of winds. Given the required implementation of erosion control measures and best management practices (BMPs) included in Storm Water Pollution Prevention Plans (SWPPPs), the low potential for water erosion, and the sediment-containment function provided by the levees along the western boundary of the project site, substantial amounts of soil erosion are not expected to occur.
- d)** The soils present on the 12 parcels identified for temporary recycled water storage and disposal have a low to moderate expansion potential. Expansive soil can cause damage to foundations, floor slabs, pavements, sidewalks, and other improvements that are sensitive to soil movements. The temporary land uses proposed would not include any improvements sensitive to expansive soils.
- e)** The CLSP includes expansion of public utilities to the plan area and construction of a wastewater treatment plant. The project would not include use of septic tanks or alternative waste water disposal systems.

## **Mitigation Measures**

Impacts associated with ground shaking, shrink-swell, and liquefaction potential would be less than significant after implementation of the following mitigation measures from the CLSP EIR, which would also apply to the proposed project modifications.

**4.7-b Ground Shaking.** Project facilities shall be designed for maximum horizontal ground surface accelerations of at least 0.3g. Geotechnical reports completed by ENGEO in 2004 for the proposed project predict that a horizontal ground surface acceleration of 0.3g at the CLSP site would have a 10 percent probability of being exceeded in a 50-year project design life. This estimate incorporates the possibility of a seismic event associated with the Great Valley Fault System. A surface acceleration of 0.3g exceeds the maximum ground surface accelerations previously recorded in the area (estimated at 0.16g), which occurred during the 1906 San Francisco earthquake. If project facilities are designed to meet minimum safety standards during a seismic event with ground surface accelerations of at least 0.3g, the risk of loss, injury, or death from ground shaking would be substantially reduced.

**4.7-c Liquefaction.** A site-specific, design-level geotechnical study shall be completed for each project development component (e.g., housing area, commercial area, school, water recycling plant, group of recycled water storage ponds) before a grading permit is issued. The study shall include an evaluation of liquefaction potential in the area and identify appropriate means to minimize or avoid damage from liquefaction. Geotechnical design recommendations included in each study shall be implemented during project construction. Potential recommendations include overexcavating and recompacting the area with engineered fill or in-place soil densification. In-place densification measures may include deep dynamic compaction, compaction grouting, vibrocompaction, and the use of nonliquefiable caps. Special design features may need to be utilized for foundations (such as post-tensioned mat foundations for residential structures and stiffening grade beams and reinforced slabs-on-grade). However, other foundation types may be considered if further geotechnical study shows the liquefaction potential to be less than significant or if the effects of liquefaction-induced settlement can be mitigated with earthwork.

**4.7-d Shrink-Swell Potential.** A site-specific, design-level geotechnical study shall be completed for each project development component (e.g., housing area, commercial area, school, water recycling plant, group of recycled water storage ponds) before a grading permit is issued. The study shall include an evaluation of expansive soils in the area and identify appropriate means to address these soils and minimize or avoid damage from shrinking and swelling consistent with UBC standards. Methods to address expansive soils include regrading with appropriate soils and adding special design features to foundations and other underground facilities. Measures included in each geotechnical study shall be implemented as appropriate, based on the specific soil conditions and the type of facility being constructed.

## **Conclusion**

No changes in circumstances or revisions of the proposed project would result in new or substantially more severe significant geology and soils impacts, compared to the analysis presented in the 2004 CLSP EIR. The previous discussions regarding geology and soils in the 2004 CLSP EIR are still applicable and changes to the proposed project would not alter the previous conclusions. The combined analysis of geology and soils issues in the 2004 CLSP EIR and the proposed project modifications evaluated in this addendum is sufficient to meet CEQA requirements and support the approval of the proposed project modifications, if the City of Lathrop so chooses.

Environmental Issue Area	Where Impact Was Analyzed in the 2004 Central Lathrop Specific Plan FEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the 2004 Central Lathrop Specific Plan FEIR Address/Resolve Impacts?
<b>8. Greenhouse Gas Emissions. Would the project:</b>					
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Not evaluated	No	No	Yes, but no significant impact would occur	N/A
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Not evaluated	No	No	Yes, but no significant impact would occur	N/A

## DISCUSSION

The 2004 CLSP EIR did not analyze greenhouse gas (GHG) emissions or associated climate change impacts of the proposed project, because GHG did not arise as a CEQA environmental impact issue until the declaration of global warming as a threat to the California environment in Assembly Bill (AB) 32, the Global Warming Solutions Act, signed into law in 2006. Changes to the proposed project since the time of prior environmental review would not result in new or increased severity of impacts; however, the emergence of the issue of climate change since the time of prior environmental review would result in new circumstances and new information requiring analysis and verification to determine whether new significant impacts or substantially more severe significant impacts may occur. When assessed in light of these new circumstances, the proposed project's GHG emissions are evaluated as to whether they would make a considerable contribution to cumulative climate change impact. A revised analysis is presented here to evaluate the project's impacts in the context of the current regulatory environment.

Unlike emissions of criteria air pollutants and TACs, which have local or regional impacts, emissions of GHGs that contribute to global warming or global climate change have a broader, global impact. Global warming is a process whereby GHGs accumulating in the atmosphere contribute to an increase in the temperature of the earth's atmosphere. The principal GHGs contributing to global warming are carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), and fluorinated compounds. The primary GHGs of concern are summarized in Table GHG-1. These gases allow visible and ultraviolet light from the sun to pass through the atmosphere, but they prevent heat from escaping back out into space. Among the potential implications of global warming are rising sea levels, and adverse impacts to water supply, water quality, agriculture, forestry, and habitats. In addition, global warming may increase electricity demand for cooling, decrease the availability of hydroelectric power, and affect regional air quality and public health. Like most criteria air pollutants and TACs, much of the GHG production comes from motor vehicles. GHG emissions can be reduced to some degree through improved coordination of land use and transportation planning on the city, county, and subregional level, and other measures to reduce automobile use. Energy conservation measures also can contribute to reductions in GHG emissions.

<b>Table GHG-1: Greenhouse Gases</b>	
Gas	Sources
Carbon dioxide (CO <sub>2</sub> )	Fossil fuel combustion in stationary and point sources; emission sources includes burning of oil, coal, gas.
Methane (CH <sub>4</sub> )	Incomplete combustion in forest fires, landfills, and leaks in natural gas and petroleum systems, agricultural activities, coal mining, wastewater treatment, and certain industrial processes.
Nitrous oxide (N <sub>2</sub> O)	Fossil fuel combustion in stationary and point sources; other emission sources include agricultural soil management, animal manure management, sewage treatment, adipic acid production, and nitric acid production.
Chlorofluorocarbon (CFC), and Hydro-chlorofluorocarbon (HCFC)	Agents used in production of foam insulation; other sources include air conditioners, refrigerators, and solvents in cleaners.
Sulfur hexafluoride (SF <sub>6</sub> )	Electric insulation in high voltage equipment that transmits and distributes electricity, including circuit breakers, gas-insulated substations, and other switchgear used in the transmission system to manage the high voltages carried between generating stations and customer load centers.
Perfluorocarbons (PFC's)	Primary aluminum production and semiconductor manufacturing.

## **Regulatory Setting – Greenhouse Gases and Climate Change**

### **Federal Greenhouse Gas Regulations**

#### **Supreme Court Ruling**

The Environmental Protection Agency (EPA) is the federal agency responsible for implementing the Clean Air Act. The U.S. Supreme Court ruled in its decision in *Massachusetts et al. v. Environmental Protection Agency et al.* ([2007] 549 U.S. 05-1120), issued on April 2, 2007, that CO<sub>2</sub> is an air pollutant as defined under the Clean Air Act, and that EPA has the authority to regulate emissions of GHGs. This has led EPA to take actions to begin regulating and monitoring GHG emissions from mobile and stationary sources.

### **State Greenhouse Gas Regulations**

#### **Assembly Bill 32 (2006), California Global Warming Solutions Act**

In September 2006, the Governor of California signed AB 32 (Chapter 488, Statutes of 2006), the California Global Warming Solutions Act of 2006, which enacted Sections 38500–38599 of the California Health and Safety Code. AB 32 requires the reduction of statewide GHG emissions to 1990 levels by 2020. This equates to an approximate 15 percent reduction compared to existing statewide GHG emission levels or a 30 percent reduction from projected 2020 “business as usual” emission levels. The 1990 GHG emissions limit is approximately 430 million metric tons (MMT) carbon dioxide equivalent (CO<sub>2</sub>e).

#### **AB 32 Climate Change Scoping Plan**

In December 2008, ARB adopted its Climate Change Scoping Plan, which contains the main strategies California will implement to achieve reduction of approximately 169 MMT of CO<sub>2</sub>e, or approximately 30 percent from the state’s projected 2020 emission level of 596 MMT of CO<sub>2</sub>e under a business-as-usual scenario (this is a reduction of 42 MMT CO<sub>2</sub>e, or almost 10 percent, from 2002-2004 average emissions). The *Scoping Plan* also includes ARB-recommended GHG reductions for each emissions sector of the state’s GHG inventory. The *Scoping Plan* calls for some of the largest reductions in GHG emissions to be achieved by implementing the following measures and standards that would affect emissions from the project (ARB 2010):

- ▲ improved emissions standards for light-duty vehicles (estimated reductions of 27.7 MMT CO<sub>2</sub>e);
- ▲ the Low-Carbon Fuel Standard (16.0 MMT CO<sub>2</sub>e);
- ▲ energy efficiency measures in buildings and appliances (15.2 MMT CO<sub>2</sub>e); and
- ▲ a renewable portfolio standard for electricity production (21.3 MMT CO<sub>2</sub>e).

ARB has not yet determined what amount of GHG reductions it recommends from local government operations; however, the *Scoping Plan* does state that land use planning and urban growth decisions will play an important role in the state's GHG reductions because local governments have primary authority to plan, zone, approve, and permit how land is developed to accommodate population growth and the changing needs of their jurisdictions (meanwhile, ARB is also developing an additional protocol for community emissions). ARB further acknowledges that decisions on how land is used will have large impacts on the GHG emissions that will result from the transportation, housing, industry, forestry, water, agriculture, electricity, and natural gas emission sectors. The *Scoping Plan* states that the ultimate GHG reduction assignment to local government operations is to be determined. With regard to land use planning, the *Scoping Plan* expects that approximately a 5.0 MMT CO<sub>2</sub>e reduction will be achieved associated with implementation of Senate Bill 375, which aims to align regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocation (ARB 2010). On March 18, 2011, the San Francisco County Superior Court issued a final decision that ARB had not complied with CEQA when it approved the Scoping Plan. Although the Scoping Plan was not found inconsistent with AB 32, the decision enjoined implementation of the Scoping Plan pending correction of the alternatives analysis and recertification of the CEQA document. ARB responded to the court's direction and continued with implementation of AB 32. ARB is currently in the process of updating the plan.

## Local Greenhouse Gas Regulations

### ***San Joaquin Valley Air Pollution Control District's Climate Change Action Plan***

The Climate Change Action Plan does not outline specific quantitative GHG increases above which a project would have a significant impact on the environment. The action plan states that "impacts of project specific emissions on global climate change are cumulative in nature, and the significance thereof should be examined in that context." Proposed projects that incorporate performance standards, such as those adopted by the San Joaquin Valley Air Pollution Control District for construction activities, could result in less-than-significant impacts.

- a, b)** The proposed project would result in GHG emissions during construction (short-term) and operation (long-term). The San Joaquin Valley Air Pollution Control District does not have an adopted significance threshold for GHG emissions. The action evaluated in this addendum; the construction, operation, and ultimate removal of temporary recycled water storage ponds and disposal fields; is consistent with activities already evaluated in the 2004 CLSP EIR.

For the purposes of this analysis, the construction of wastewater storage ponds on approximately 40 acres during Phase 1 and the relocation of these ponds offsite during Phase 2 is assumed to be the equivalent of 120 acres of ground disturbance (40 acres to construct the ponds, 40 acres to remove the ponds, 40 acres to reconstruct the ponds). In 2010, an evaluation of Phase 3 of the Reclamation District 17's 100-Year Levee Seepage Project, which included over 200 acres of earthwork, found that the project would emit 5,249 metric tons of CO<sub>2</sub>e, which would not exceed ARB's interim guidance of 7,000 metric tons of CO<sub>2</sub>e (USACE and RD 17 2011). Therefore, the earthmoving associated with the construction of the ponds for temporary recycled water storage would not be expected to generate GHG emissions that would have a significant impact on the environment or conflict with an applicable plan or regulation.

**Mitigation Measures**

No mitigation measures would be required.

**Conclusion**

This analysis of GHG issues relative to the proposed project modifications would be sufficient to meet CEQA regulations and support approval of the proposed project modifications, if the City of Lathrop so chooses.

Environmental Issue Area	Where Impact Was Analyzed in the 2004 Central Lathrop Specific Plan FEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the 2004 Central Lathrop Specific Plan FEIR Address/Resolve Impacts?
<b>9. Hazards and Hazardous Materials. Would the project:</b>					
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	4.9-4 to 4.9-5	No	No	No	No
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?	4.9-5	No	No	No	Yes
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Not evaluated	No	No	No	N/A
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?	4.9-5	No	No	No	No
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 for people residing or working in the project area?	Not evaluated	No	No	No	N/A
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working on the project area?	Not evaluated	No	No	No	N/A
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	4.10-9	No	No	No	Yes

Environmental Issue Area	Where Impact Was Analyzed in the 2004 Central Lathrop Specific Plan FEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the 2004 Central Lathrop Specific Plan FEIR Address/Resolve Impacts?
<b>9. Hazards and Hazardous Materials. Would the project:</b>					
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	Not evaluated	No	No	No	N/A

**DISCUSSION**

Implementation of the CLSP would have less-than-significant impacts related to use of hazardous materials and potential public health impacts associated with recycled water. Impacts associated with exposure of construction workers or residents to hazardous materials and obstruction of roadways during construction would be reduced to a less-than-significant level with the implementation of mitigation measures. The potential use of the 12 parcels within the CLSP area for recycled water storage and disposal would not result in new or substantially more severe impacts. There are no new circumstances since the certification of the CLSP EIR that would influence hazards and hazardous materials impacts associated with the CLSP project or this addendum, and there is no new information requiring analysis or verification.

**a, b, d)** A Phase I Environmental Site Assessment for portions of the 12 parcels under evaluation was completed in 2003. That assessment did not identify any soil or groundwater impairment. There is potential that unrecorded sites were not reported in this assessment. Excavation and construction activities at or near areas of currently unrecorded soil and/or groundwater contamination could expose construction workers to hazardous materials. There is also the potential that contamination has occurred since the assessment was conducted. Based on review of the Department of Toxic Substances Control’s Envirostor database (2013), no additional recognized environmental concerns have been recorded since the 2003 evaluation.

Development of the project site with residential and commercial uses would involve the storage, use, and transport of hazardous materials (e.g., asphalt, fuel, lubricants, paint) during construction activities. In addition, commercial uses associated with project operation could include facilities such as gas stations and dry cleaners that could use and routinely transport hazardous material on and off the project site. Transportation of hazardous materials on area roadways is regulated by the California Highway Patrol and Caltrans, whereas use of these materials is regulated by the California Department of Toxic Substances Control (DTSC), as outlined in Title 22 of the California Code of Regulations. The project applicant, builders, contractors, business owners, and others would be required to use, store, and transport hazardous materials in compliance with local, state, and federal regulations during project construction and operation. Facilities that would use hazardous materials on site after the project is constructed would be required to obtain permits and comply with appropriate regulatory agency standards designed to avoid hazardous waste releases. Because the project would implement and comply with existing hazardous material regulations, impacts related to creation of significant hazards to



the public through routine transport, use, disposal, and risk of upset would not occur with project development.

- c) Lathrop High School has been constructed since the analysis in the 2004 CLSP EIR was completed. Most of the 12 parcels under evaluation are within 0.25-mile of the high school. Recycled water storage and disposal would not generate hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste, and there would be no impact to this school.
- e, f) The CLSP area is not within 2 mile of any public or private airport, and it is not located within the vicinity of any private airstrip. Therefore, the project would not result in any safety hazards associated with aircraft.
- g) Although no adopted emergency response plan would be obstructed by project construction and operations, ongoing construction activities could result in temporary lane closures, increased truck traffic, and other roadway effects that could slow or stop emergency vehicles, temporarily increasing response times and impeding existing service.
- h) The project site is in the service area of the Lathrop-Manteca Fire Protection District. Although largely undeveloped, the CLSP area does not include wildlands that would expose people or structures to a significant fire risk.

## **Mitigation Measures**

Impacts associated with exposure of construction workers or residents to hazardous materials and obstruction of roadways during construction would be reduced to a less-than-significant level with the implementation of the following mitigation measures from the CLSP EIR.

**4.9-b Exposure of Construction Workers, Residents, and Others to Hazardous Materials.** Before excavations in any areas not previously evaluated using the Environmental Site Assessment (ESA) process or before demolition of any structures associated with past and current farming operations (e.g., buildings, aboveground and underground storage tanks), the project applicant shall investigate the extent to which soil and/or groundwater has been contaminated from these operations. This investigation shall follow ESA and/or other appropriate testing guidelines and shall include, as necessary, analysis of soil and/or groundwater samples taken at or near the potential contamination sites. Areas previously evaluated in the Terrasearch (1999) and ENGEO (2003) ESAs shall also receive an evaluation that follows appropriate testing guidelines before excavation begins to determine whether conditions have changed since completion of the previous ESAs. If the results of any evaluation indicate that contamination exists at levels above regulatory action standards, then the San Joaquin County Environmental Health Department (SJCEHD) shall be notified and the site shall be remediated in accordance with recommendations made by SJCEHD; RWQCB; DTSC; or other appropriate federal, state, or local regulatory agencies. The agencies involved would be dependent on the type and extent of contamination.

In addition, the following measures shall apply to construction activities as appropriate.

(1) The SJCEHD shall be notified if evidence of previously undiscovered soil or groundwater contamination (e.g., stained soil, odorous groundwater) is encountered during excavation and dewatering activities. Any contaminated areas shall be remediated in accordance with recommendations made by SJCEHD; RWQCB; DTSC; or other appropriate federal, state, or local regulatory agencies.

(2) Before demolition of any onsite buildings, the project applicant shall hire a qualified consultant to investigate whether any of these buildings contain asbestos-containing materials and lead that could become friable or

mobile during demolition activities. If found, the asbestos-containing materials and lead shall be removed by an accredited inspector in accordance with EPA and California Occupational Safety and Health Administration (Cal/OSHA) standards. In addition, all activities (construction or demolition) in the vicinity of these materials shall comply with Cal/OSHA asbestos and lead worker construction standards. The asbestos-containing materials and lead shall be disposed of properly at an appropriate offsite disposal facility.

**4.10-a Obstruction of Roadways during Construction.** In accordance with City requirements, the applicant/contractor shall prepare and implement traffic control plans for construction activities that may affect road rights-of-way. The traffic control plan must follow California Department of Transportation standards and be signed by a professional engineer. Measures typically used in traffic control plans include advertising of planned lane closures, warning signage, flagmen to direct traffic flows when needed, and methods to ensure continued access by emergency vehicles. During project construction, access to existing land uses shall be maintained at all times, with detours being used as necessary during road closures.

### **Conclusion**

The combined analysis of hazards and hazardous materials issues in the CLSP EIR and the proposed project modifications evaluated in this addendum is sufficient to meet CEQA requirements and support the approval of the proposed project modifications, if the City of Lathrop so chooses.

Environmental Issue Area	Where Impact Was Analyzed in the 2004 Central Lathrop Specific Plan FEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the 2004 Central Lathrop Specific Plan FEIR Address/Resolve Impacts?
<b>10. Hydrology and Water Quality. Would the Project:</b>					
a. Violate any water quality standards or waste discharge requirements?	4.8-25 to 4.8-29	No	No	No	Yes
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	4.11-14 to 4.11-17	No	No	No	No
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	4.7-17, 4.15-20 to 4.15-22	No	No	No	No
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	4.8-24	No	No	No	No
e. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	4.8-26 to 4.8-27, 4.11-26 to 4.11-28	No	No	No	No
f. Otherwise substantially degrade water quality?	4.8-28 to 4.8-29, 4.9-6	No	No	No	No

Environmental Issue Area	Where Impact Was Analyzed in the 2004 Central Lathrop Specific Plan FEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the 2004 Central Lathrop Specific Plan FEIR Address/Resolve Impacts?
<b>10. Hydrology and Water Quality. Would the Project:</b>					
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	4.8-24 to 4.8-25	No	No	No	No
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	4.8-24 to 4.8-25	No	No	No	No
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	4.8-24 to 4.8-25	No	No	No	No
j. Inundation by seiche, tsunami, or mudflow?	Not evaluated	No	No	No	N/A

**DISCUSSION**

The CLSP is in an area east of the San Joaquin River designated by Federal Emergency Management Agency as Flood Hazard Zone B, which indicates that the surrounding levees provide protection for flooding up to at least the 1-in-100-year flood event. At flood stage, the water level in the San Joaquin River is almost 15 feet higher than the adjoining CLSP land elevations and drainage is pumped over the levee into the river.

The 2004 CLSP EIR determined that the CLSP project would result in less-than-significant impacts associated with soil erosion, flooding risk from increased runoff and levee failure, and effects of recycled water on groundwater quality. With the implementation of mitigation measures, which would also apply to the proposed project modifications, potential impacts from construction-related water quality effects, demand for potable water, and construction on the waterside of the levee would be reduced to less-than-significant impacts. There are no new circumstances since certification of the CLSP EIR that would influence hydrology and water quality impacts associated with the proposed temporary use of parcels within the CLSP for recycled water storage and disposal.

- a) Grading, excavation, and earth moving would disturb existing vegetative cover, soil, and drainage systems. Construction activities could result in substantial soil erosion and stormwater discharges of suspended solids, increased turbidity, and potential mobilization of other pollutants from project construction sites as contaminated runoff or direct discharges to drainage channels.

During operation of the project, stormwater runoff water quality and loading to the San Joaquin River would be improved for potential constituents of concern compared to existing conditions. Runoff from areas proposed for recycled water application could potentially be discharged to the San Joaquin River and affect river water quality, or percolate to groundwater and affect sub-surface aquifers. However, the high level of treatment to be applied to the recycled water, the pollutant reduction capacity of the

soil and plant matter onto which the recycled water is to be applied, the fact that all stormwater would first pass through the project's proposed BMPs, and the presence of the San Joaquin River east levee between the river and the project site that would prevent gravity flow of recycled water (or stormwater containing recycled water) to the river, would all combine to result in a less-than-significant water quality impact.

The RWQCB requires the installation of monitoring wells both before and after the application of reclaimed water. Groundwater data are typically collected quarterly and compared to background data to identify any indications of groundwater degradation. Violations of water quality criteria or permit conditions are enforced by the RWQCB with requirements to repair faulty equipment, adjust application rates, or cease operations. These precautions, together with the tertiary treatment given to the recycled water itself, would be sufficient to protect the quality of water in existing wells in surrounding areas.

- b)** The City of Lathrop obtains drinking water from the Central Valley aquifer system. The potable water required to serve the proposed project would be provided, in part, by the City's municipal well system. Additional wells may be required, as addressed in the Water Master Plan. The City prepared a project-level CEQA analysis for construction of Wells #21-23 and did not determine that their construction would have an impact on groundwater supplies and aquifer volume. The CLSP project would adhere to the City's adopted water conservation requirements (Section 13.08.180 of the Lathrop Code of Ordinances) to reduce the need for withdrawals from the underground aquifers. Recycled water storage and disposal would not contribute to drawdown of the groundwater table. Temporary use of the 12 parcels under evaluation in this addendum for recycled water storage and disposal would not alter the CLSP's potential impacts to groundwater supplies.
- c)** The soils in the CLSP area are not prone to water erosion. Construction contractors would be required to prepare and comply with a SWPPP as part of the project design and implement BMPs included in the SWPPP to minimize potential erosion during construction. In addition, the levees at the western boundary of the planning area along the San Joaquin River act as a barrier to minimize sediments being moved from the CLSP area to the San Joaquin River. Nonetheless, sediments entering the drainages on site could be pumped into the San Joaquin River via the stormwater outfall facility included in the CLSP. Temporary use of the 12 parcels under evaluation in this addendum for recycled water storage and disposal would not alter the potential for the CLSP project to result in substantial siltation of erosion.
- d)** The project area drainage plan, as described in the 2004 CLSP EIR, is designed to detain stormwater on the project site generated by the 48-hour, 100 year flood event, plus a 10 percent safety factor, while limiting discharges to the San Joaquin River. These detention and discharge requirements would be met while protecting homes and other structures from on-site flooding. The proposed CLSP drainage system would provide sufficient capacity to address project-generated stormwater and would prevent stormwater related flooding damage on the project site. Temporary use of the 12 parcels under evaluation in this addendum for recycled water storage and disposal would not alter the potential for the CLSP project to result in flooding.
- e)** Implementation of the proposed project would increase the amount of impervious surface in the CLSP area, producing increased stormwater runoff that would require collection and discharge. The proposed stormwater collection system would function by discharging all stormwater runoff directly into the San Joaquin River. The CLSP project includes an extensive stormwater management system to collect, detain, and discharge stormwater runoff generated in the CLSP area. The system has been designed to meet the two key stormwater management criteria:

- (1) Discharge to the San Joaquin River cannot exceed 30 percent of the estimated 100-year peak post project runoff rate.
- (2) When water levels in the San Joaquin River exceed the 21.0-foot elevation, discharges to the river are restricted to pre-project rates. As a result of this restriction, development must be designed to detain runoff from a 48-hour, 100-year storm, with discharges to the river limited to pre-development rates. This state restriction supercedes the local discharge criteria above whenever water levels in the San Joaquin River exceed the 21.0-foot elevation.

As required by Reclamation District 17, no part of any detention facility would be located nearer than 200 feet to the base of the levee. Although development under the CLSP would increase the amount of stormwater runoff, the stormwater management system is designed to provide sufficient onsite detention and discharge capacity to meet applicable design criteria.

The conversion of agricultural land within the CLSP area to urban land uses would alter the types, quantities, and timing of contaminant discharges in stormwater runoff relative to existing conditions. As described in the 2004 CLSP EIR, the level of contaminants in stormwater runoff from CLSP development is anticipated to be substantially lower than the existing runoff from agricultural activities following implementation of structural and nonstructural pollution prevention and control BMPs.

Temporary use of the 12 parcels under evaluation in this addendum for recycled water storage and disposal would not alter the potential for the CLSP project to create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.

- f)** As explained in the 2004 CLSP EIR, a portion of the recycled water generated by the project would be land applied onsite for irrigation of public (e.g., parks, playfields, roadway medians) and potentially private (i.e., front and back yards) landscaping. The remainder would be disposed of offsite through irrigation of dedicated agricultural spray fields. There is the potential that use of recycled water could result in contaminants reaching the San Joaquin River via over application of recycled water resulting in direct runoff, or from stormwater carrying contaminants from recycled water application areas to the river. Percolation of recycled water through the soil could also carry contaminants to sub-surface aquifers. However, for a variety of reasons, adverse impacts on San Joaquin River and groundwater water quality from use of recycled water are considered highly unlikely.

Recycled water leaving the treatment plant would be disinfected and would undergo tertiary treatment to Title 22 standards for unrestricted use. Tertiary treatment includes the removal of nutrients such as phosphorous and nitrogen, and practically all suspended and organic matter from wastewater. Therefore, the recycled water would contain minimal to no water quality constituents that could be directly (via runoff of recycled water) or indirectly (via deposition in the recycled water disposal areas then subsequent mobilization through stormwater runoff) transported to the San Joaquin River, or reach groundwater aquifers via percolation through the soil.

The San Joaquin River levee serves as a physical barrier that separates the project site from the river, preventing gravity flow of recycled water to the river and ensuring that recycled water and stormwater from CLSP application areas must pass through the stormwater drainage system and associated BMPs. Temporary use of the 12 parcels under evaluation in this addendum for recycled water storage and disposal would not change the potential for the CLSP project to impact water quality.

- g, h, i)** The CLSP is located outside the 100-year floodplain, in an area protected by levees from the 1 percent chance flood. The east levee of the San Joaquin River has been improved since the 1997 flood year by Reclamation District 17 and the USACE consistent with the latest levee design and construction practices. Furthermore, there is no substantial evidence to suggest that levee failure in the area of the project site is likely or that the Lathrop segment of the levee is more prone to failure than segments in other areas, and the proposed project would do nothing to increase the potential for levee failure.
- j)** Seiches, tsunamis, and mudflows were not analyzed in detail in the 2004 CLSP EIR because site geography dictates a very low potential for these hazards to occur. The potential for damaging seiches is considered very low to negligible because of the absence of a deep, large open body of water adjacent to or in the project site. The potential for tsunamis at the proposed project site is considered negligible because of the distance from the San Francisco Bay and the Pacific Ocean.

### **Mitigation Measures**

Implementation of the following mitigation measures provided in the CLSP EIR, which would also apply to the proposed project modifications, would reduce the potential impacts from construction-related water quality effects, demand for potable water, and construction on the waterside of the levee to less-than-significant impacts. No new hydrology and water quality impacts would result from the project modifications evaluated in this addendum, and no new mitigation measures are required.

**4.8-c: Temporary Construction-related Water Quality Effects.** The project applicant shall consult with the Central Valley RWQCB to acquire the appropriate regulatory approvals that may be necessary to obtain Section 401 water quality certification, State Water Resources Control Board (SWRCB) statewide National Pollutant Discharge Elimination System (NPDES) stormwater permit for general construction activity, Central Valley RWQCB NPDES permit for construction dewatering activity, and any other necessary site-specific WDRs or waivers under the Porter-Cologne Act. As required under the NPDES stormwater permit for general construction activity, the project applicant shall prepare and submit the appropriate notices of intent and prepare the SWPPP and any other necessary engineering plans and specifications for pollution prevention and control. The SWPPP and other appropriate plans shall identify and specify the use of erosion and sediment control BMPs, means of waste disposal, implementation of approved local plans, nonstormwater management controls, permanent postconstruction BMPs, and inspection and maintenance responsibilities. The SWPPP will also specify the pollutants that are likely to be used during construction that could be present in stormwater drainage and nonstormwater discharges. A sampling and monitoring program will be included in the SWPPP that meets the requirements of SWRCB Order 99-08-DWQ to ensure that the BMPs are effective.

Construction techniques shall be identified that will reduce the potential for runoff, and the plan shall identify the erosion and sedimentation control measures to be implemented. The SWPPP shall also specify spill prevention and contingency measures, identify the types of materials used for equipment operation, and identify measures to prevent or clean up spills of hazardous materials used for equipment operation and hazardous waste. Emergency procedures for responding to spills shall also be identified. BMPs identified in the SWPPP shall be used in all subsequent site development activities. The SWPPP will identify personnel training requirements and procedures that will be used to ensure that workers are aware of permit requirements and proper installation and performance inspection methods for BMPs specified in the SWPPP. The SWPPP shall also identify the appropriate personnel responsible for supervisory duties related to implementation of the SWPPP. All construction contractors shall retain a copy of the approved SWPPP on the construction site.

The project applicant shall also prepare and submit a Notice of Intent and acquire authorization for the Central Valley RWQCB NPDES permit for construction dewatering activities that may be necessary for foundation and utility installations within the CLSP area.

Under SWRCB Order 99-08-DWQ, as amended, the SWRCB has determined that implementation of a SWPPP, the BMPs identified in the SWPPP, and the monitoring and sampling program required in the SWPPP are considered to meet the water quality requirements of the Porter-Cologne Act, barring a violation identified by the monitoring or sampling procedures.

### **Conclusion**

The combined analysis of hydrology and water quality issues for the CLSP and the proposed project modifications in this addendum is sufficient to meet CEQA requirements and support the approval of the proposed project modifications, if the City of Lathrop so chooses.



Environmental Issue Area	Where Impact Was Analyzed in the 2004 Central Lathrop Specific Plan DEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the 2004 Central Lathrop Specific Plan DEIR Address/Resolve Impacts?
<b>11. Land Use and Planning. Would the project:</b>					
a. Physically divide an established community?	4.2-11 to 4.2-13	No	No	No	No
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	4.2-13 to 4.2-22	No	No	No	No
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	4.2-23	No	No	No	No

## DISCUSSION

The 2004 CLSP EIR evaluates several potential areas for storage and disposal of tertiary treated and disinfected recycled water. This addendum evaluates an additional 12 parcels within the CLSP area for temporary recycled water storage and disposal. The areas considered are currently fallow, or used for agriculture and residences. Impacts to land use and planning were determined less-than-significant in the 2004 CLSP EIR.

The CLSP area and adjacent properties were historically dominated by agricultural lands interspersed with farmsteads and associated outbuildings. Generally, the area continues to display this type of land use, although portions of the CLSP area have been disturbed to prepare the site for development and are currently fallow, and other areas have been developed for urban uses. Improvements to the area include the construction of Lathrop High School on West Lathrop Road and the addition of several roads in the CLSP area. The Mossdale Landing project residential/commercial development is located to the south of the CLSP. Agricultural land uses continue to dominate land north of the CLSP and west of the San Joaquin River. The City's residential and commercial core is located east of I-5.

In response to approval of the CLSP, the CLSP area was annexed into the City of Lathrop and the city boundary was amended in 2004. The 2004 CLSP EIR identified the parcels under consideration as future community park, neighborhood park, a kindergarten through 8<sup>th</sup> grade school site, and variable density residential. The City of Lathrop's General Plan Map (last revised September 2012) has adopted the land use designations of the CLSP for Central Lathrop. None of the sites have been developed for these proposed uses. There are no new circumstances since certification of the CLSP EIR that would influence land use impacts associated with temporary recycled water storage and disposal evaluated in this addendum, and there is no new information requiring analysis for verification of the EIR conclusions related to land use.

- a) The 2004 CLSP EIR determined that the project would not result in the physical division of a community. The addition of temporary recycled water storage or disposal sites would not result in an increased

potential to divide an established community. Therefore, the EIR conclusions are not altered by the project modifications.

- b) The CLSP was developed to integrate into the City of Lathrop's General Plan, and included amendments to the plan. No conflicts with applicable land use plans were identified in the 2004 CLSP EIR. Disposal of recycled water through irrigation of crops would not change the existing land uses at these sites; they would remain in agricultural production. Although construction and operation of storage ponds would constitute a change in land use, the conversion of land from agricultural use was previously evaluated in the 2004 CLSP EIR. Development of the temporary recycled water storage ponds would not result in a new significant or substantially more severe impact.
- c) The CLSP is within the area covered by the SJMSCP. Specifically, the CLSP area is identified in the SJMSCP as a part of the Central Zone, which encompasses the lands surrounding each of the county's seven incorporated cities. The SJMSCP identifies the Central Zone as the area where most of the county's existing urban development is located and where proposed new development is anticipated to occur. The SJMSCP defers to city general plans and the County General Plan for land use designations. Therefore, with regard to land use and planning, the project's consistency with the city and county general plans implies consistency with the SJMSCP. Development in the CLSP area and use of potential utility sites would not conflict with SJMSCP conservation goals. There have been no changes to the SJCMSP since certification of the CLSP EIR.

### ***Mitigation Measures***

No new significant impacts or increase in the severity of previously-identified impacts to land use would occur as a result of the proposed project modifications. Therefore, no new mitigation is required.

### ***Conclusion***

Changes to the proposed project since the time of prior environmental review would not result in new or increased severity of impacts to land use. Temporary use of agricultural parcels within the CLSP for recycled water storage and disposal was analyzed in the 2004 CLSP EIR and found to result in a less than significant impact to land use. Use of different parcels within the CLSP area for the same purpose would not result in any new significant impacts to land use. The combined analysis of land use and planning issues for the CLSP and the proposed project modifications in this addendum is sufficient to meet CEQA requirements and support the approval of the proposed project modifications, if the City of Lathrop so chooses.

Environmental Issue Area	Where Impact Was Analyzed in the 2004 Central Lathrop Specific Plan FEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the 2004 Central Lathrop Specific Plan FEIR Address/Resolve Impacts?
<b>12. Mineral Resources. Would the Project:</b>					
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?	4.7-19	No	No	No	Yes
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?	4.7-19	No	No	No	Yes

**DISCUSSION**

The parcels under consideration are located in an area classified as Mineral Resource Zone 1 (areas where no mineral deposits are present or are unlikely). The 2004 CLSP EIR identifies impacts due to the potential use of parcels outside of the CLSP for permanent recycled water storage, treatment, and disposal. Impacts associated with locating these facilities on land identified as areas with potential mineral resource would be mitigated to less than significant with implementation of the mitigation measure presented in the 2004 CLSP EIR. The proposed project modifications would not result in an impact to mineral resources because the parcels under evaluation are in an area where the presence of mineral resources is unlikely. No new circumstances or important information have been identified since certification of the 2004 CLSP EIR.

- a, b) The proposed recycled water storage and disposal facilities would be located on land where mineral deposits are not present or presence of mineral resources is unlikely. This development would not be expected to impede extraction or result in the loss of availability of a known mineral resource.

**Mitigation Measures**

No new significant impacts or increase in the severity of previously-identified impacts to mineral resources would occur as a result of the proposed project. Therefore, no new mitigation is required.

**Conclusion**

Changes to the proposed project since the time of prior environmental review would not result in new or increased severity of impacts to mineral resources. Temporary use of parcels within the CLSP for water storage and disposal was analyzed in the 2004 CLSP EIR and found to result in a less than significant impact to mineral resources. Use of different parcels within the CLSP for the same purposes would not result in any new significant impacts to mineral resources. The combined analysis of mineral resources for the CLSP and the proposed project modifications in this addendum is sufficient to meet CEQA requirements and support the approval of the proposed project modifications, if the City of Lathrop so chooses.

Environmental Issue Area	Where Impact Was Analyzed in the 2004 Central Lathrop Specific Plan FEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the 2004 Central Lathrop Specific Plan FEIR Address/Resolve Impacts?
<b>13. Noise. Would the project result in:</b>					
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	4.6-13 to 4.6-19	No	No	No	Yes
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	Not evaluated	No	No	No	N/A
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	4.6-15 to 4.6-21	No	No	No	Yes
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	4.6-13 to 4.6-15	No	No	No	Yes
e. For a project located within an airport land use plan or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	Not evaluated	No	No	No	N/A
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	Not evaluated	No	No	No	N/A

**DISCUSSION**

The proposed project modifications would not change noise levels from those analyzed in the 2004 CLSP EIR. Construction of ponds would utilize equipment (i.e., bulldozers) that generates noise and vibrations, but operation of the storage ponds and spray fields would not generate significant noise. Impacts from construction-generated noise and stationary noise generated from onsite land uses would be reduced to less than significant with mitigation. Traffic noise and compatibility of proposed land uses with onsite noise levels would have significant and unavoidable impacts.

There are no new circumstances since certification of the 2004 CLSP EIR that would influence noise impacts associated with temporary recycled water storage and disposal evaluated in this addendum, and there is no new information requiring analysis for verification of the EIR conclusions related to noise.

- a, c, d)** Depending on the construction activities performed, as well as the duration and hours during which activities occur, construction-generated noise levels could violate City Noise Ordinance standards. Construction activities occurring during the evening and nighttime hours, when people are more sensitive to noise, could result in increased levels of annoyance and sleep disruption to occupants of nearby residences.
- b)** Although earthmoving generates ground vibrations, the proposed project modifications would not result in excessive groundborne vibration or noise. Because the type of earthwork required to construct the recycled water storage ponds would not generate substantial groundborne vibrations, it is unlikely to impact sensitive receptors, including Lathrop High School. The impact of constructing recycled water storage ponds would be less than significant.
- e, f)** The CLSP would not expose people to noise generated by aircraft because the plan area is not located within 2 miles of any public or private airport and is not located within the vicinity of any private airstrip. There are no significance thresholds addressing the impacts of aircraft noise in the project area in the 2004 CLSP EIR.

### **Mitigation Measures**

No new noise impacts would result from the project modifications evaluated in this addendum, and no new mitigation measures are required. The following mitigation measures included in the CLSP EIR would apply to the project activities evaluated in this addendum.

**4.6-a: Increases in Short-term Construction-generated Noise.** In accordance with the City Noise Ordinance, construction activities in or within 500 feet of a residential zone (i.e., an area containing occupied residences) shall be permitted only between 7 a.m. and 10 p.m. on Monday through Thursday, between 7 a.m. and 11 p.m. on Friday, between 9 a.m. and 11 p.m. on Saturday, and between 9 a.m. and 10 p.m. on Sunday and legal holidays. These limitations shall be specified in all construction contracts and specifications entered into by the applicant and/or its successors in interest.

In addition, all construction vehicles or equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers and acoustical shields or shrouds, in accordance with manufacturers' recommendations. Construction equipment and truck routes shall be arranged to minimize travel adjacent to occupied residences. Stationary construction equipment and staging areas shall be located as far as possible from sensitive receptors, and temporary acoustic barriers may be installed around stationary equipment if necessary.

**4.6-b: Stationary-Source Noise Generated by Onsite Land Uses.** As individual facilities, subdivisions, and other project elements are permitted by the City, the City shall evaluate the element for compliance with the City's Noise Ordinance and noise policies in the City General Plan. Where individual project elements do not clearly comply with interior noise standards included in these guidelines, mitigation measures shall be required to reduce projected interior and exterior noise levels to within acceptable levels.

Mitigation measures may include, but are not limited to, the following:

- ▲ Dual-pane, noise-rated windows; mechanical air systems; exterior wall insulation; and other noise-reducing building materials shall be used.
- ▲ Mechanical equipment (e.g., air conditioning and ventilation systems) and area-source operations (e.g., loading docks, parking lots, recreational use areas) shall be located at the farthest distance from and/or be shielded from nearby existing and proposed noise-sensitive land uses.

In addition, the following measures will apply to noise-generating activities associated with school grounds, neighborhood and community parks, and open space areas:

- ▲ Onsite landscape maintenance equipment shall be equipped with properly operating exhaust mufflers and engine shrouds, in accordance with manufacturers' specifications.
- ▲ For maintenance areas located within 500 feet of noise-sensitive land uses, the operation of onsite landscape maintenance equipment shall be limited to the least noise sensitive periods of the day, between the hours of 7 a.m. and 7 p.m.
- ▲ Outdoor use of amplified sound systems within 500 feet of noise-sensitive land uses shall only be permitted between 7 a.m. and 10 p.m. on Sunday through Thursday, and between 7 a.m. and 11 p.m. on Friday and Saturday.

Also, prior to the approval of site development plans for each recycled water lift station and booster pump station, the City's contractor shall submit a supplemental noise analysis demonstrating that stationary noise sources will be adequately designed and constructed (including the incorporation of shielding or enclosures) to ensure that operational noise levels at the property lines and at the nearest noise-sensitive land uses comply with the City Noise Ordinance.

## **Conclusion**

Use of parcels within the CLSP area for temporary recycled water storage and disposal could generate more construction noise than use of the parcels outside of the CLSP area because offsite recycled water storage would have to be constructed at a later date – essentially doubling the required construction. Use of the CLSP area for temporary recycled water storage and disposal was previously analyzed, however, and the use of the 12 parcels evaluated in this addendum would not change the potential noise impacts or conclusions of the 2004 CLSP EIR.

The combined analysis of noise issues for the CLSP and the proposed project modifications in this addendum is sufficient to meet CEQA requirements and support the approval of the proposed project modifications, if the City of Lathrop so chooses.

Environmental Issue Area	Where Impact Was Analyzed in the 2004 Central Lathrop Specific Plan FEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the 2004 Central Lathrop Specific Plan FEIR Address/Resolve Impacts?
<b>14. Population and Housing. Would the Project:</b>					
a. Induce substantial 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)?	4.3-9 to 4.3-11	No	No	No	No
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	4.3-13 to 4.3-14	No	No	No	No
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	4.3-13 to 4.3-14	No	No	No	No

## DISCUSSION

The population and housing conditions in the San Joaquin Valley are not substantially different from 2004. The 2004 CLSP EIR found all impacts to population and housing less than significant, and no mitigation measures were identified. There are not any new circumstances or important information requiring analysis or that could result in a new significant impact.

- a) Project construction activities would occur at intervals throughout the planning horizon of the proposed project. A greater number of construction workers would be employed during peak construction periods (determined by market demand and overall economic conditions), while fewer construction workers would be employed during nonpeak periods. It is estimated that on a peak construction day, up to 300 construction workers would be employed in the construction of proposed facilities. The existing number of residents in the City and County who are employed in the construction industry would likely be sufficient to meet the demand for construction workers that would be generated by the proposed project. Because construction workers serving the proposed project can be expected to come from the City itself and from nearby communities in San Joaquin County, substantial population growth or increases in housing demand in the region as a result of these jobs is not anticipated. Furthermore, even if some construction workers from outside the region were employed at the project site, construction workers typically do not change residences when assigned to a new construction site, and substantial permanent relocation of these workers to the area is not anticipated. Therefore, the proposed project would not be expected to generate the need for substantial additional housing in the City during construction.

Population growth by itself is not considered a significant environmental impact. However, development of housing, infrastructure, and facilities and services to serve this growth can have significant impacts on the environment through land conversions, commitment of resources, and other mechanisms. Following construction, the 18,750 residents projected for the CLSP area would not exceed the maximum

population allowed by the General Plan. Direct impacts associated with development needed to accommodate increased population are evaluated in appropriate sections in the 2004 CLSP EIR. Construction of recycled water disposal or storage facilities on parcels different from those identified in the 2004 CLSP EIR would not result in a more severe impact upon population growth.

- b, c)** The 2004 CLSP EIR assumed removal of all existing residences. Use of parcels within the CLSP for recycled water storage or disposal would not result in the displacement of any additional residences, and there would be no additional impact.

### ***Mitigation Measures***

No new significant impacts or increase in the severity of previously-identified impacts to population and housing would occur as a result of the proposed project. Therefore, no new mitigation is required.

### ***Conclusion***

Changes to the proposed project since the time of prior environmental review would not result in new or increased severity of impacts to population and housing. Temporary use of parcels within the CLSP for recycled water storage and disposal was analyzed in the 2004 CLSP EIR and found to result in a less than significant impact to population and housing. Use of different parcels within the CLSP for the same purposes as those analyzed in the 2004 CLSP EIR would not result in any new significant impacts to population and housing.



Environmental Issue Area	Where Impact Was Analyzed in the 2004 Central Lathrop Specific Plan FEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the 2004 Central Lathrop Specific Plan FEIR Address/Resolve Impacts?
<b>15. Public Services.</b>					
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, to maintain acceptable service ratios, response times or other performance objectives for any the public services:					
i. Fire protection?	4.10-10	No	No	No	No
ii. Police protection?	4.10-11 to 4.10-12	No	No	No	No
iii. Schools?	4.10-12 to 4.10-14	No	No	No	No
iv. Parks?	4.12-7 to 4.12-9	No	No	No	No
v. Other public facilities?	4.10-12	No	No	No	No

## DISCUSSION

Recycled water storage ponds and spray fields do not generate demand for public services. Demand generated by the project as a whole would be the same as described in the 2004 CLSP EIR. No mitigation would be required for impacts to schools, which would be less than significant. Impacts to fire protection, police protection, and animal control facilities and services would be less than significant after mitigation. No new significant impacts or increase in the severity of previously-identified impacts to public services would occur as a result of the proposed project modifications. There are no new circumstances since certification of the 2004 CLSP EIR that would influence impacts to public services associated with implementing the CLSP or the modifications evaluated in this addendum. There is no new information requiring analysis for verification of the EIR conclusions regarding the effects of these issues.

- ai)** To maintain an appropriate level of service, a minimum of 13 additional firefighters would need to be added to accommodate Phase 1, and an additional 10 firefighters would need to be added to accommodate Phase 2 for a total of 23 additional firefighters at full project buildout. Since the 2004 CLSP EIR was published, Station 34 was constructed at 460 River Islands Parkway south of the CLSP area in Lathrop. A new fire station would also be constructed in the CLSP area at an as-yet-undetermined location.

- aii)** The CLSP would generate demand for additional officers, staff, equipment, and facilities to maintain the level of service currently provided by the Lathrop Police Department. Using the identified target ratio of 1.5 officers to 1,000 residents in the City, a minimum of 16 additional police officers would need to be added to accommodate Phase 1, and an additional 12 police officers would need to be added to accommodate Phase 2 for a total of 28 additional police officers at full project buildout to maintain a similar level of service. Additional administrative staff members would also be required to support these patrol officers.
- aiii)** The proposed project would increase the demand for elementary school and high school facilities. An estimated total of 3,050 students would be housed by residential development in the CLSP area at buildout. The proposed project provides sufficient school capacity to meet demand during all phases of project development.

The 12 parcels under evaluation include an approximately 19-acre site originally proposed for development as a school for Kindergarten through 8<sup>th</sup> Grade students in Phase 1. This site would be converted to school use as necessitated by construction in the CLSP area.

- aiv)** The CLSP would provide neighborhood park facilities in excess of anticipated demand and General Plan requirements. Implementation of the proposed project would result in the CLSP community park being constructed around Dos Reis Regional Park. However, after project development, Dos Reis Regional Park would remain in County ownership and would continue to provide similar facilities and services. There would be no change to the boat launch facilities and RV and tent camping would be retained.
- av)** Increased population associated with the proposed project would result in a corresponding increase in demand for animal control services. Because existing service levels could be adversely affected by the proposed project, and additional staff and facilities would be required to maintain acceptable service levels.

### ***Mitigation Measures***

No new significant impacts or an increase in the severity of previously-identified impacts to public services would occur as a result of the proposed project. Therefore, no new mitigation is required.

### ***Conclusion***

The 2004 CLSP EIR concluded that recycled water storage ponds would not generate substantial demand for public services that could result in significant environmental effects. Changes to the proposed project since the time of prior environmental review would not result in new or increased severity of impacts to public services because the proposed land uses, maximum number of employment/overnight guests, and project site are the same as discussed in the 2004 CLSP EIR. The proposed project would not result in any new significant impacts related to public services. The combined analysis of public services for the CLSP and the proposed project modifications in this addendum is sufficient to meet CEQA requirements and support the approval of the proposed project modifications, if the City of Lathrop so chooses.

Environmental Issue Area	Where Impact Was Analyzed in the 2004 Central Lathrop Specific Plan FEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the 2004 Central Lathrop Specific Plan FEIR Address/Resolve Impacts?
<b>16. Recreation.</b>					
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?	4.12-7 to 4.12-9	No	No	No	No
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?	4.12-7 to 4.12-9	No	No	No	No

**DISCUSSION**

Impacts to recreation were determined to be less than significant in the 2004 CLSP EIR. There are no new circumstances since certification of the CLSP EIR that would influence recreation impacts associated with the CLSP or the project modifications evaluated in this addendum, and there is no new information requiring analysis or verification.

**a, b)** The City General Plan standard for parklands is 2 acres of neighborhood park and 3 acres of community park per 1,000 residences. The proposed project would increase the population by an estimated 8,311 residents during Phase 1. To meet the City General Plan standard for neighborhood parks, the proposed development would be required to provide approximately 17 acres of neighborhood park by the completion of Phase 1. The CLSP proposes 35 acres of neighborhood parks at the completion of Phase 1.

To meet the City General Plan standard for community parks, the proposed development would be required to provide approximately 25 acres of community park by the completion of Phase 1. The CLSP proposes approximately 60 acres of community park area at the completion of Phase 1. Within the proposed community park, the existing 9.85-acre Dos Reis Regional Park would be retained with its existing facilities and services.

The 12 parcels under evaluation for temporary recycled water storage and disposal include lands for two 5-acre neighborhood parks and a small portion of the large community park originally proposed for construction in Phase 1. These areas would be converted to the intended park uses as necessitated by construction in the CLSP area. These areas are not necessary to meet the General Plan parkland requirements for Phase 1.

**Mitigation Measures**

No new impacts to recreational facilities are anticipated as a result of the proposed project modifications. Therefore, no mitigation is required.

**Conclusion**

No changes in circumstances or revisions of the proposed project would result in new or substantially more severe significant environmental impacts. The combined analysis of recreation issues in the 2004 CLSP EIR and this addendum is sufficient to meet CEQA requirements and support the approval of the proposed project modifications, if the City of Lathrop so chooses.

Environmental Issue Area	Where Impact Was Analyzed in the 2004 Central Lathrop Specific Plan FEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the 2004 Central Lathrop Specific Plan FEIR Address/Resolve Impacts?
<b>17. Transportation/Traffic. Would the project:</b>					
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	4.4-40 to 4.4-58	No	No	No	Yes
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	4.4-40 to 4.4-58	No	No	No	Yes
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	Not evaluated	No	No	No	N/A
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	4.4-58 to 4.4-61	No	No	No	Yes
e. Result in inadequate emergency access?	4.10-9	No	No	No	Yes
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	4.4-58 to 4.4-61	No	No	No	Yes

## DISCUSSION

The existing De Lima Road and Dos Reis Road are rural, two lane roads that span the CLSP area between Manthey Road (which runs parallel and adjacent to the western side of I-5) and the San Joaquin River. The CLSP proposes improving these roadways to major east/west collectors. Golden Valley Parkway, which is planned as

one of the two major arterials in the CLSP area, has been partially constructed and currently terminates as Dos Reis Road. Surface street access between the CLSP area and locations east of I-5 would be provided by Lathrop Road.

Impacts to level of service identified in the CLSP EIR would be mitigated; at some intersections and road segments this would result in a less-than-significant impact, while in other locations the impact would be significant and unavoidable. Impacts associated with construction traffic and potential safety hazards would be reduced to less-than-significant levels. There are no new circumstances since certification of the CLSP EIR that would influence transportation impacts associated with the CLSP or the project modifications evaluated in this addendum, and there is no new information requiring analysis or verification. The temporary use of parcels within the CLSP for recycled water storage and disposal would not increase traffic to the area. There would be no changes to the roadway network analyzed in the 2004 CLSP EIR.

- a, b)** The 2004 CLSP EIR evaluated several intersections, ramp segments, and freeway segments in the CLSP area and identified several areas where the proposed project would cause an increase in AM and/or PM peak hour traffic volumes and affect the level of service at these intersections.

Recycled water storage and disposal within the CLSP would not generate a considerable quantity of vehicle trips, and the trips that would be generated were considered in the 2004 CLSP EIR for the properties north of De Lima Road. There would not be additional impacts to the circulation system as a result of the proposed relocation of temporary recycled water storage and disposal sites.

- c)** The project is not located near an airport, and project modifications would not change the CLSP to include structures with attributes that could impede flight paths, such as structures that would exceed height restrictions.
- d, f)** The CLSP includes a proposed transit center and park and ride facility. In addition, internal project roadways could accommodate public transit services. The 2004 CLSP EIR concluded that the project would not increase safety concerns for vehicles, pedestrians, and bicycle riders related to lane widths, shoulder widths, parking lane widths, and bicycle and pedestrian trails. However, the proposed use of roundabouts at up to five intersections in the CLSP area could substantially increase safety concerns for pedestrians and bicyclists. The proposed use of 12 parcels for temporary recycled water storage and disposal would not affect the performance or safety of public transit, bicycle, or pedestrian facilities.
- e)** Ongoing construction activities could result in temporary lane closures, increased truck traffic, and other roadway effects that could slow or stop emergency vehicles, temporarily increasing response times and impeding existing service. This potential would be no greater with use of the lands south of De Lima Road (rather than those to the north, as identified in the 2004 CLSP EIR).

### ***Mitigation Measures***

No new impacts to transportation would result from the project modifications evaluated in this addendum, and no new mitigation measures are required.

### ***Conclusion***

No changes in circumstances or revisions of the proposed project would result in new or substantially more severe significant traffic and transportation impacts, compared to the analysis presented in the 2004 CLSP EIR. Trip generation would be the same as previously evaluated. The combined analysis of the transportation issues

for the CLSP in the 2004 EIR and this addendum is sufficient to meet CEQA requirements and support the approval of the proposed project modifications, if the City of Lathrop so chooses.

Environmental Issue Area	Where Impact Was Analyzed in the 2004 Central Lathrop Specific Plan FEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the 2004 Central Lathrop Specific Plan FEIR Address/Resolve Impacts?
<b>18. Utilities and Service Systems. Would the Project:</b>					
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	4.11-20 to 4.11-21	No	No	No	Yes
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	4.11-16 to 4.11-24	No	No	No	No
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	4.11-26 to 4.11-28	No	No	No	No
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	4.11-14 to 4.11-16	No	No	No	Yes
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	4.11-20	No	No	No	No
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	4.10-15	No	No	No	No
g. Comply with federal, state, and local statutes and regulations related to solid waste?	4.10-15	No	No	No	No

**DISCUSSION**

The Water Master Plan EIR indicates that, in 2001, municipal water pipes in the CLSP area were present in De Lima Road, Dos Reis Road, and a small portion of Manthey Road. Other properties in the CLSP area are served by onsite wells. Nonpotable water is also supplied to the CLSP area for agricultural uses, with water drawn from the



San Joaquin River using existing riparian and appropriative water rights. The water is conveyed through a series of irrigation canals, pump stations, and pipelines.

There are limited public storm drain facilities serving the CLSP area. Currently, runoff from the site is minimal because of the high soil permeability associated with the agricultural/fallow nature of the site. Storm and irrigation runoff that does not percolate to groundwater is collected in a system of shallow agricultural ditches and discharged into the San Joaquin River.

As discussed in the 2004 CLSP EIR, waste generation and surface runoff impacts for the CLSP project would be less than significant. Demand for potable water and wastewater treatment capacity would be less than significant following mitigation. There are no new circumstances involving new impacts or new information requiring analysis. As indicated in the 2004 CLSP EIR, recycled water storage and disposal areas would provide utility service (i.e., wastewater treatment and recycled water storage/disposal) in support of planned development and would not themselves generate substantial demand for utility services that could result in significant environmental effects.

- a, b, e)** The construction, operation, and ultimate removal of recycled water storage ponds and spray fields in the 12 parcels considered in this addendum would not generate wastewater and would not generate demand for wastewater treatment beyond what is already considered in the 2004 CLSP EIR. The proposed recycled water storage ponds and disposal fields evaluated in this addendum would provide necessary storage and disposal areas consistent with conditions already evaluated in the CLSP EIR. The modified location of these facilities related to the CLSP EIR would not affect the capacity of water and wastewater treatment facilities.
- c)** Implementation of the CLSP would increase the amount of impervious surface in the CLSP area, producing increased stormwater runoff that would require collection and discharge. The CLSP includes an extensive stormwater management system that would include gravity lines that collect surface runoff, a system of multiple detention facilities, gravity outfalls, and a pump station and force main and is designed to provide sufficient onsite detention and discharge capacity to meet applicable design criteria. The proposed recycled water storage pond and disposal field locations evaluated in this addendum would not impact the amount of stormwater generation estimated in the CLSP EIR or conclusions regarding the efficacy of the stormwater management system.
- d)** Development of the CLSP would create demand for potable water that could not be met by existing water production facilities. Construction of additional City wells (wells 21, 22, and 23) and the South San Joaquin Irrigation District's South County Surface Water Supply Project will provide additional water supply. The proposed recycled water storage ponds and disposal fields would not have an effect on potable water demand and, therefore, would not alter the impacts identified in the 2004 CLSP EIR.
- f, g)** Combining residential and business solid waste generation, the overall solid waste generation for the CLSP is approximately 15,905 to 16,780 tons per year. The Foothill Sanitary Landfill has approximately 44 million tons of available capacity, which is estimated to last for more than four decades. This landfill has sufficient permitted capacity to accommodate the project's solid waste disposal needs. The proposed project would also comply with all federal, state, and local statutes and regulations related to solid waste reduction and recycling. The proposed recycled water storage ponds and disposal fields would not have an appreciable effect on solid waste generation.

### ***Mitigation Measures***

No new impacts to utilities and service systems would result from the project modifications evaluated in this addendum, and no new mitigation measures are required.

### ***Conclusion***

The combined analysis of utilities and service systems for the CLSP in the 2004 EIR and this addendum is sufficient to meet CEQA requirements and support the approval of the proposed project modifications, if the City of Lathrop so chooses.

Environmental Issue Area	Where Impact Was Analyzed in the 2004 Central Lathrop Specific Plan FEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the 2004 Central Lathrop Specific Plan FEIR Address/Resolve Impacts?
<b>19. Mandatory Findings of Significance.</b>					
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	See individual sections	No	No	No	Yes
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 view in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	See individual sections	No	No	No	Yes
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	See individual sections	No	No	No	Yes

**Conclusion**

- a, c) As described in the preceding sections, the proposed project modifications evaluated in this addendum would not change any of the impact conclusions of the 2004 CLSP EIR, and would not substantially increase the severity of identified impacts. The project would have the same significant and unavoidable adverse impacts related to traffic, air quality, noise, agricultural resources, terrestrial biology, aesthetic resources, and cumulative impacts whether or not the proposed modifications are included. All other impacts would be less than significant.
  
- b) In Chapter 5, Cumulative Impacts, of the Draft EIR, the CLSP is considered together with related projects and regional development for each of the environmental issue areas evaluated in the 2004 CLSP EIR. Consistent with the intent of a cumulative analysis, where the combined effects of multiple projects are to be considered, the various elements of the CLSP are generally evaluated as a whole. The CLSP would result in direct and indirect cumulatively considerable incremental contributions to significant

cumulative impacts related to transportation and circulation, air quality, noise, public services, public utilities, agricultural resources, odor, surface water quality, and groundwater. Cumulative impacts related to terrestrial biology may be mitigated to less than significant levels through proposed creation of riparian brush rabbit habitat associated with the River Islands project. However, no feasible mitigation is available for the remainder of the cumulative impacts identified. The proposed modifications evaluated in this addendum do not alter the CLSP's individual impacts, and therefore do not alter the plan's contributions to cumulative impacts, and would not change the cumulative impact conclusions provided in the 2004 CLSP EIR.

### **3.3 CONCLUSIONS REGARDING THE ENVIRONMENTAL ANALYSIS OF THE PROPOSED PROJECT MODIFICATIONS**

Based on the analysis of the categories of environmental impacts evaluated above, implementing the CLSP with the modifications described in this document would result in none of the conditions described in Section 15162 of the State CEQA Guidelines calling for preparation of a subsequent EIR. In summary, no altered circumstances or new information of substantial importance has been identified since certification of the 2004 CLSP EIR, and the project modifications evaluated in this addendum would not: 1) result in any new environmental effects; 2) substantially increase the severity of any previously identified effects; 3) result in mitigation measures or alternatives previously found to be infeasible becoming feasible; and 4) result in availability/implementation of mitigation measures or alternatives that are considerably different from those analyzed in the previous document that would substantially reduce one or more significant effects on the environment. These conclusions confirm that this addendum to the 2004 CLSP EIR is the appropriate CEQA document to evaluate and record the minor project modifications described in this document.

## 4 LIST OF PREPARERS AND PERSONS CONSULTED

### 4.1 LIST OF PREPARERS

#### Ascent Environmental

Gary Jakobs ..... Principal-in-Charge  
Sean Bechta ..... Project Manager  
Jessica Babcock..... Environmental Planner

### 4.2 PERSONS CONSULTED

#### City of Lathrop

Greg Gibson

#### MacKay & Soms Civil Engineers, Inc.

Christopher Guenther

#### RMC Water and Environment

Ryan Alameda

## 5 REFERENCES

- Air Resources Board. 2010 (October). Scoping Plan Measures Implementation Timeline. Available: [http://www.arb.ca.gov/cc/scopingplan/sp\\_measures\\_implementation\\_timeline.pdf](http://www.arb.ca.gov/cc/scopingplan/sp_measures_implementation_timeline.pdf)
- California Department of Toxic Substances Control. 2013. Envirostor Database. Available: <http://www.envirostor.dtsc.ca.gov>. Accessed: Sept 16, 2013.
- US Army Corps of Engineers and Reclamation District 17. 2001 (September). Draft Environmental Impact Statement/Environmental Impact Report: Phase 3 – RD 17 100-Year Levee Seepage Area Project. SCH# 2010042073. Sacramento, CA.
- US Environmental Protection Agency. 2013. Green Book: Currently Designated Nonattainment Areas for All Criteria Pollutants. Available: <http://www.epa.gov/oaqps001/greenbk/ancl.html>. Accessed: Sept 13, 2013. Last updated July 31, 2013.