Second Addendum to the Subsequent Environmental Impact Report

for the

River Islands at Lathrop Project



State Clearinghouse No. 1993112027

February 2007



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TABLE OF CONTENTS

1	INTRODUCTION				
	1.1	Background and Action Triggering the Addendum	1-1		
	1.2	CEQA Guidelines Regarding the Addendum to the SEIR	1-7		
2	DES	CRIPTION OF THE PROPOSED ACTION			
	2.1	Scope and Format of the Project Description			
	2.2	Location and Setting			
	2.3	Project Background			
	2.4	Project Goals and Objectives			
	2.5	Project Description			
	2.6	Project Elements Unique to the Tract 3694 VTM Proposal			
3	AFFECTED ENVIRONMENT, ENVIRONMENTAL CONSEQUENCES, AND				
	MIT	IGATION MEASURES			
	3.1	Approach to Environmental Analysis			
	3.2	Land Use Consistency and Compatibility			
	3.3	Population, Employment, and Housing			
	3.4	Traffic			
	3.5	Air Quality			
	3.6	Noise			
	3.7	Geology, Soils, and Mineral Resources			
	3.8	Hydrology and Water Quality			
	3.9	Hazardous Materials and Public Health			
	3.10	Public Services			
	3.11	Public Utilities			
	3.12	Recreation			
	3.13	Agricultural Resources			
	3.14				
	3.15	Fisheries	3-31		
	3.16	Cultural Resources			
	3.17	Aesthetic Resources			
	3.18	Growth-Inducing Impacts			
	3.19	Cumulative Impacts			
	3.20	Alternatives			
	3.21	Conclusion			
4	REF	ERENCES	4-1		

Appendix

A TJKM Transportation Consultants – River Islands Traffic Analysis

TABLE OF CONTENTS (CONTINUED)

Pages

Exhibits

1-1	Project Vicinity Map	1-2
	River Islands at Lathrop Development Concept Plan	
	Tract 3491 VTM Development and District Boundaries	
2-1	Tract 3694 Development Proposal	2-5

ACRONYMS AND ABBREVIATIONS

	annual avagadance probability
AEP	annual exceedance probability
BMP	best management practices
CDMG	California Department of Conservation, Division of Mines and Geology
CEQA	California Environmental Quality Act
CFF	City's Capital Facility Fee
CFR	Code of Federal Regulations
City	City of Lathrop
CR-RI	Employment Center
ESA	federal Endangered Species Act
FEMA	Federal Emergency Management Agency
I-5	Interstate 5
kV	kilovolt
LID	Lathrop Irrigation District
LMFPD	Lathrop-Manteca Fire Protection District
LOS	level of service
mgd	million gallons per day
MU-RI	mixed-use Town Center
NMFS	National Oceanic and Atmospheric Administration, National Marine Fisheries Service
PDP	Preliminary Development Plan
PG&E	Pacific Gas & Electric Company
RD	Reclamation District
RH-RI	residential high
RID	River Islands Development
RL-RI	residential low
RM-RI	residential medium
SCSWSP	South County Surface Water Supply Project
SEIR	Subsequent Environmental Impact Report
SJMSCP	San Joaquin County Multi-Species Habitat Conservation and Open Space Plan
SSJID	South San Joaquin Irrigation District
TDS	total dissolved solids
UDC	Urban Design Concept
UPRR	Union Pacific Railroad
VTM	vesting tentative map
WLSP	West Lathrop Specific Plan
WRP	Water Recycling Plan
WSA	Water Supply Assessment

1 INTRODUCTION

1.1 BACKGROUND AND ACTION TRIGGERING THE ADDENDUM

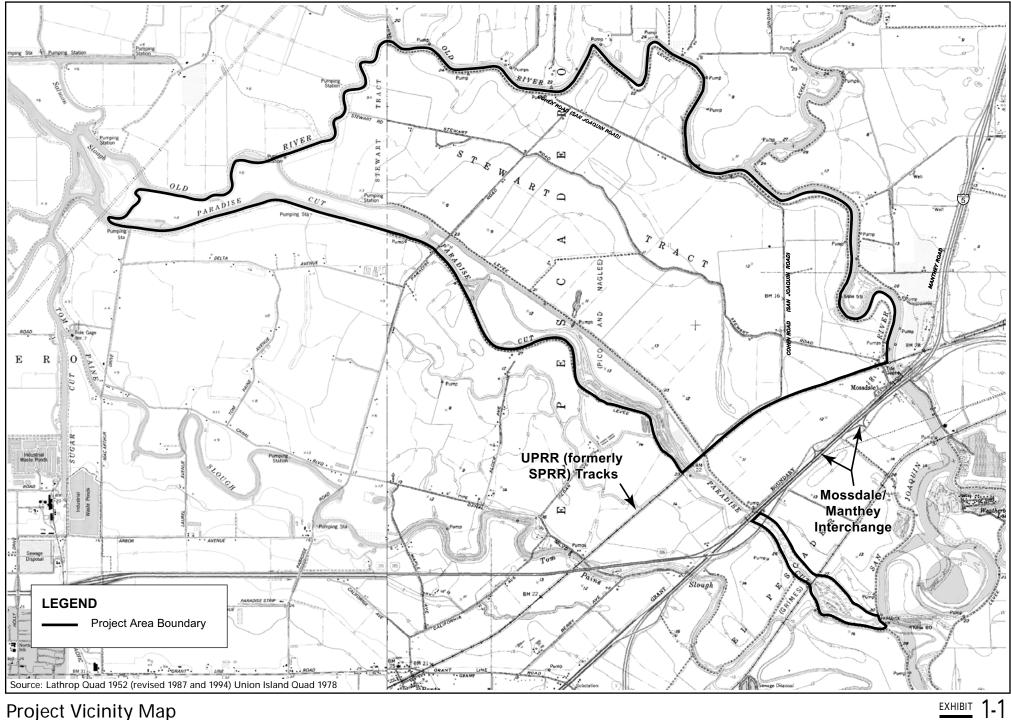
On January 28, 2003, the City of Lathrop (City) certified the Subsequent Environmental Impact Report (SEIR) for the River Islands at Lathrop Project and approved various entitlements, such as amendments to the *Lathrop General Plan* and *West Lathrop Specific Plan* (WLSP), cancellation of existing Williamson Act contracts on various parcels, and approval of a vesting tentative map (VTM). The entire project site covers approximately 4,905 acres on Stewart Tract and Paradise Cut (Exhibit 1-1). The proposed project includes, among other uses, an Employment Center, a Town Center, residential districts, golf courses, dock facilities, various flood management elements, construction of a central lake and other water features, and preservation, restoration, and creation of terrestrial and aquatic habitats (Exhibit 1-2). Project construction is split among two primary development phases, Phase 1 and Phase 2, following an approximately 20-year buildout schedule. The VTM approved at the time of SEIR certification is identified as the Tract 3221 VTM, which is the identifier given by San Joaquin County for the map. The Tract 3221 VTM generally encompasses the Phase 1 development area identified in the SEIR and subdivided approximately 1,500 acres of Stewart Tract to support development in this area.

In July of 2005, the City approved a revised VTM for the project, the Tract 3491 VTM. The Tract 3491 VTM made several alterations to the previously adopted Tract 3221 VTM, including modifications to the development boundary and the phasing of buildout of the Employment Center (Exhibit 1-3). The alterations did not affect the number or type of housing units included in previous approvals or the development components of Phase 2 of the project. At the time the Tract 3491 VTM was adopted, an addendum to the SEIR was certified (City of Lathrop 2005) that confirmed that the Tract 3491 VTM and any altered conditions since certification of the SEIR would:

- ▶ not result in any new significant environmental effects, and
- ► not substantially increase the severity of previously identified effects.

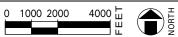
The addendum also identified that no new information of substantial importance had arisen since certification of the SEIR that showed:

- ► the project would have new significant effects,
- ► the project would have substantially more severe effects,
- ► that mitigation measures or alternatives previously found to be infeasible would in fact be feasible, or
- that mitigation measures or alternatives that are considerably different from those analyzed in the SEIR would substantially reduce one or more significant effects on the environment.

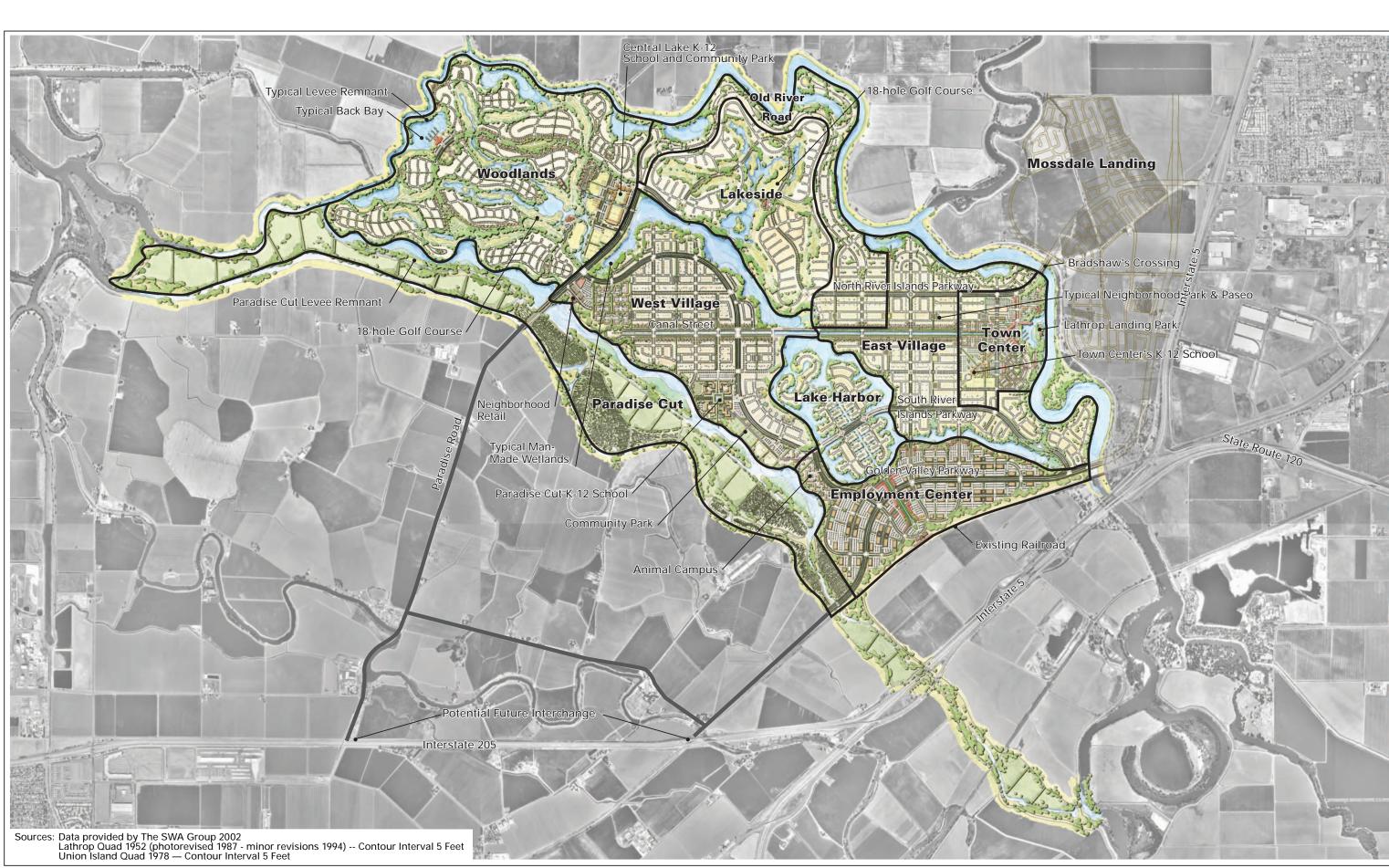


Project Vicinity Map

River Islands at Lathrop **CITY OF LATHROP** G 05110026.01 05/05





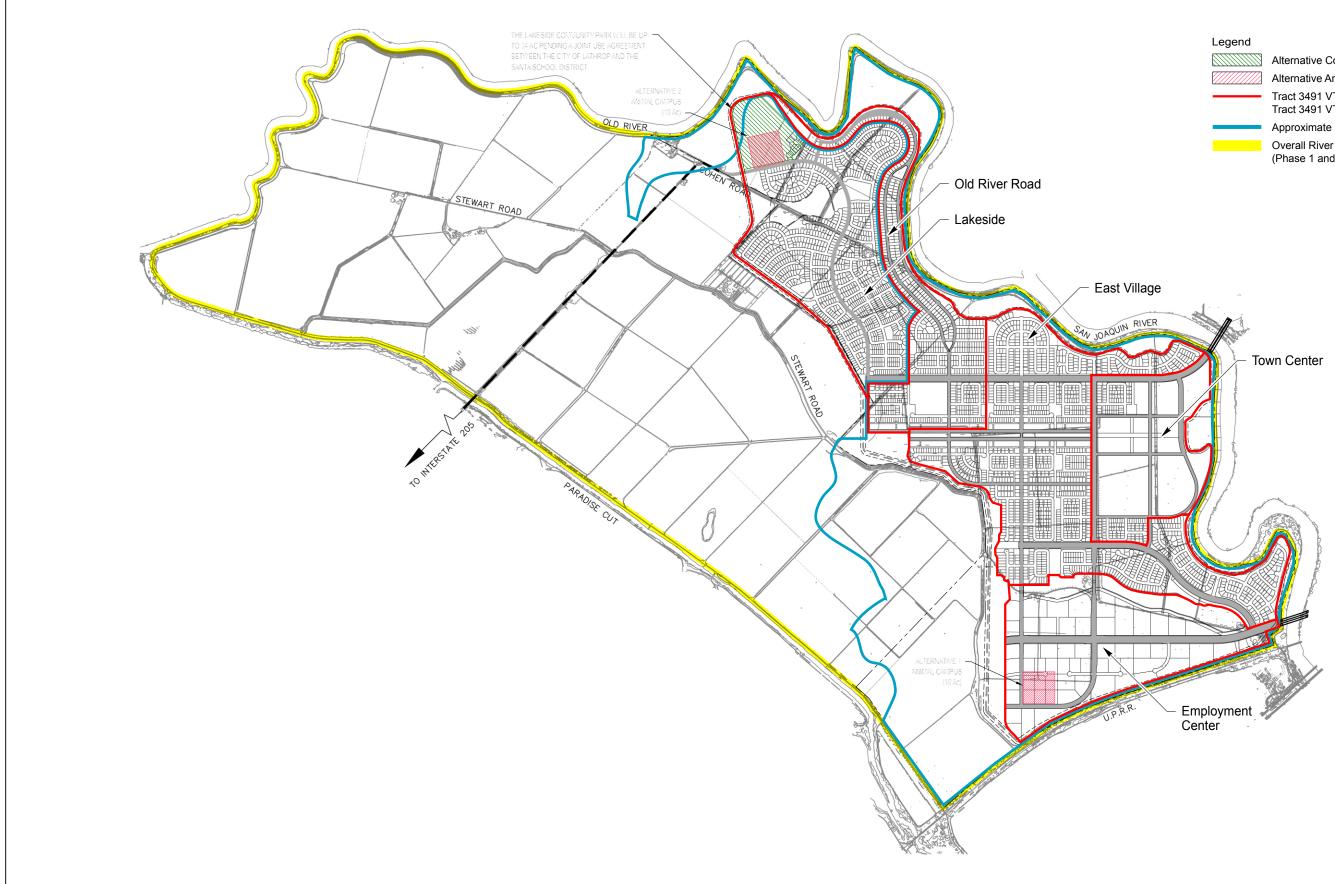


River Islands at Lathrop Development Concept Plan

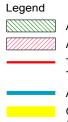
River Islands at Lathrop CITY OF LATHROP G 05110026.01 05/05







Proposed Tract 3491 VTM Development and District Boundaries



Alternative Community Park Site Alternative Animal Campus Site Tract 3491 VTM Project Districts (Proposed Tract 3491 VTM Phase 1 Development) Approximate Phase 1 Boundary in the SEIR Overall River Islands Development Area (Phase 1 and 2)





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When the Tract 3491 VTM was adopted and the accompanying addendum was certified, the Tract 3491 VTM became part of the River Islands project and the SEIR for the purposes of the California Environmental Quality Act (CEQA).

In December 2006, the project applicant for the River Islands project, Califia, LLC, submitted an application for a new VTM for the project. Tract 3694 is the identifier given by San Joaquin County for this new VTM. The Tract 3694 VTM would subdivide approximately 1,793 acres of Stewart Tract to support development of Phase 1 of the project. Approximately 1,500 acres of this area is the same area included in the Tract 3491 VTM. Approximately 76 acres are portions of high-ground corridors along the San Joaquin River and Old River recently made available for development (See Chapter 2, "Description of the Proposed Action," for a full description of high-ground corridors and other elements included in the Tract 3694 VTM proposal). Approximately 434 acres included in the Tract 3694 VTM are not proposed for development at this time. The Tract 3694 includes the same number of housing units as past approvals for Phase 1 of project development (i.e., Tract 3221 and 3491 VTMs), but with a slightly higher ratio of single-family units relative to multifamily units. The Tract 3694 also includes a slightly modified transportation network relative to that identified in the Tract 3221 and 3491 VTMs.

The development proposal included as part of the proposed Tract 3694 VTM is very similar to the existing development proposal approved with the Tract 3491 VTM and Phase 1 of development evaluated in the SEIR; however, the City, as lead agency for the project under CEQA, believes that the proposals differ sufficiently to result in minor modifications and clarifications to the prior SEIR. The City has determined that, in accordance with Section 15164 of the State CEQA Guidelines, the preparation of this addendum to the River Islands SEIR is warranted.

It should be noted that the Tract 3491 VTM, as approved in July 2005, remains valid and would only be superseded if Tract 3694 is approved by City Council action and a final map is recorded against the property based on the new VTM.

1.2 CEQA GUIDELINES REGARDING THE ADDENDUM TO THE SEIR

If, after certification of an EIR, altered conditions, changes, or additions to a project occur, CEQA provides three mechanisms to address these changes: an SEIR, a supplement to an EIR, and an addendum to an EIR.

Section 15162 of the State CEQA Guidelines describes the conditions under which an SEIR would be prepared. In summary, when an EIR has been certified for a project, no SEIR 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:

- substantial changes are proposed in the project that 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 effects;
- (2) substantial changes occur with respect to the circumstances under which the project is undertaken that 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.
 - (D) Mitigation measures or alternatives that 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 an SEIR if:

- (1) any of the conditions described above for Section 15162 would require the preparation of an SEIR, and
- (2) only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.

Section 15164 of the State CEQA Guidelines states that a lead agency may prepare an addendum to a previously certified EIR if some changes or additions are necessary, but none of the conditions described above for Section 15162 calling for preparation of an SEIR have occurred.

The differences between the River Islands project, as described in the 2003 SEIR and the 2005 addendum to the SEIR, and the development proposal included in the Tract 3694 VTM application constitute changes consistent with Section 15164 that may be addressed in an addendum to an EIR. As described in Chapter 2 of this document,

"Description of the Proposed Action," and Chapter 3, "Affected Environment, Environmental Consequences, and Mitigation Measures," none of the conditions described above for Section 15162 calling for preparation of an SEIR have occurred. The Tract 3694 VTM development proposal does not deviate appreciably from conditions included in required project entitlements. In addition, the 2003 SEIR and resulting Mitigation Monitoring and Reporting Program are still valid for assessing and mitigating identified impacts as a result of the project.

Changes to the project associated with the Tract 3694 VTM proposal and any altered conditions since certification of the SEIR in January 2003 or the addendum to the SEIR in July of 2005 will:

- ► not result in any new significant environmental effects, and
- ► not substantially increase the severity of previously identified effects.

In addition, no new information of substantial importance has arisen that shows:

- ► the project will have new significant effects,
- ► the project will have substantially more severe effects,
- ► that mitigation measures or alternatives previously found to be infeasible would in fact be feasible, or
- that mitigation measures or alternatives that are considerably different from those analyzed in the SEIR would substantially reduce one or more significant effects on the environment.

Because minor clarifying changes/additions to the SEIR for the River Islands project are necessary to address the Tract 3694 VTM development proposal, but none of the conditions described in Section 15162 of the State CEQA Guidelines calling for preparation of an SEIR or subsequent mitigated negative declaration have occurred, an addendum to the SEIR for the River Islands project, consistent with Section 15164 of the State CEQA Guidelines, is the appropriate mechanism to address the Tract 3694 VTM development proposal.

2 DESCRIPTION OF THE PROPOSED ACTION

2.1 SCOPE AND FORMAT OF THE PROJECT DESCRIPTION

The proposed action evaluated in this addendum to the SEIR for the River Islands project (Addendum) is the adoption of the Tract 3694 VTM, and development of Phase 1 of the River Islands project consistent with the Tract 3694 VTM proposal. For the remainder of this analysis, unless otherwise noted, the term Phase 1 is intended to refer to both Phase 1a and Phase 1 as described in the SEIR and previous addendum. For purposes of this Addendum, the proposed Phase 1 actions are referred to as the "Tract 3694 VTM development proposal," the "Tract 3694 VTM proposal," or simply the "proposed project" or "project." When referring to any project elements or phases as described in the SEIR, the previous addendum to the SEIR for Tract 3491, or current project approvals, the terms "SEIR," "previous addendum to the SEIR," "previous addendum," or "current project approvals" are included in the relevant text.

The purpose of this Addendum is (1) to document minor changes in Phase 1 of the River Islands project as reflected in the Tract 3694 VTM proposal when compared to the River Islands project evaluated in the SEIR, the existing adopted addendum to the SEIR, and current project approvals, and (2) to evaluate whether these differences result in new significant impacts, significant changes in the severity of previously identified environmental impacts, or significant changes in the effectiveness or applicability of mitigation measures and project alternatives.

Consistent with this purpose, the project description provided below is intended, in large part, to highlight the minor alterations associated with the Tract 3694 VTM proposal when compared to the current project approvals associated with the implementation of Phase 1 of the River Islands project. The Tract 3964 VTM proposal is first described in its entirety to provide context for the complete action for which the project applicants are seeking approval. Then the specific differences between the Tract 3694 VTM proposal and the project as described in the SEIR, the previous addendum addressing the Tract 3491 VTM, and current project approvals are described. These differences are the focus of the analysis in this Addendum. Typically, where past project proposals and the Tract 3694 VTM proposal are the same, the similarities are not noted.

Overall project development at full buildout is not appreciably altered by the Tract 3694 VTM proposal, which covers only Phase 1 of development, and analysis of full buildout of the River Islands project (i.e., completion of Phase 2 development) is not the subject of this Addendum. The primary changes associated with the Phase 1 approvals under consideration do not involve a modification to the sequence or phasing of the overall River Islands project. For a more detailed description of the River Islands project, particularly for elements included in Phase 2 of the project, the reader is referred to the certified SEIR, the previous addendum to the SEIR, and associated approvals.

2.2 LOCATION AND SETTING

Conditions related to the location and setting for the proposed project have not changed from what is described in the previous addendum. However, it should be noted that Section 3.1, "Location and Setting," in the SEIR describes the location of the River Islands Project site in its entirety, whereas the Tract 3694 VTM development proposal only encompasses a portion of the project site associated with Phase 1 of project development.

2.3 PROJECT BACKGROUND

Information included in the SEIR related to Stewart Tract planning history, previous development plans for Stewart Tract, and previous environmental documents remains accurate and applicable. Background information relevant to this Addendum is supplemented by the certification of the SEIR, the previous addendum addressing the Tract 3491 VTM, and associated approvals and entitlements, which were summarized previously in Section 1.1, "Background and Action Triggering the Addendum."

2.4 PROJECT GOALS AND OBJECTIVES

There are no changes in project goals and objectives related to the Tract 3694 VTM proposal.

2.5 PROJECT DESCRIPTION

The Tract 3491 VTM proposal includes the subdivision of approximately 1,793 acres of land comprising Phase 1 of the River Islands project (Exhibit 2-1). Land uses included in the tentative map are RL-RI (residential low), RM-RI (residential medium), RH-RI (residential high), MU-RI (mixed-use Town Center), and CR-RI (Employment Center). The Tract 3694 VTM area includes the following development districts: Town Center, East Village, Employment Center (portion), Lakeside (portion), and Old River (portion). The submitted map is consistent with previously approved Preliminary Development Plans (PDPs) for each of these districts, with the exception of a minor revision to the PDP for the Lakeside District.

The Tract 3694 VTM contains 4,284 residential units, consisting of 3,741 single-family units and 543 multifamily units. General land use categories associated with the Tract 3694 VTM proposal include a Town Center, an Employment Center, residential areas, lakes and water features, schools, and parks and trails. Specific elements of the proposed project would include:

 a first phase of the Employment Center, consisting of roughly 164 acres of developable Employment Center land use (see Exhibit 1-2 for proposed project district boundaries at full buildout and Exhibit 2-1 for project district boundaries under the Tract 3694 VTM proposal);

- approximately 156 acres of the Town Center District, within which would be roughly 62 acres of Town Center land use;
- an approximately 31-acre school in the Town Center District and an additional school covering approximately 11 acres in the East Village District;
- approximately 715 acres of residential development within the Town Center, Old River Road, Lakeside, and East Village Districts;
- approximately 75.5 acres of parkland (with 8 acres of additional lands within the school site in the Town Center available for recreational use under a joint use agreement between the City and Banta Elementary School District);
- ► approximately 143 acres of recreational open space and trails;
- ► an Animal Campus covering approximately 10 acres in one of two locations;
- approximately 92 acres of water bodies in the internal water system (i.e., within the project's levees) consisting of lakes and canals and an additional 10.8 acres of water treatment wetlands;
- ► approximately 135 acres of arterial and collector roadways; and
- other necessary public facilities and infrastructure to support the project.

Major streets included in the plan are: River Islands Parkway (North and South), Broad Street, Commercial Street, Golden Valley Parkway, and Water Street. Within the park and trail acreage described above is a linear park and trail along the San Joaquin River and Old River edge, which would provide a community-wide recreational amenity.

Approximately 1,500 acres of the area encompassed by the Tract 3694 VTM is the same area included in the Tract 3491 VTM. Note that the Tract 3491 VTM covered approximately 1,500 acres, but 1,300 acres were proposed for development under this scenario. Similarly, although the Tract 3694 VTM covers approximately 1,793 acres, roughly 1,359 acres are proposed for development at this time. The roughly 434 acres not currently proposed for development will be considered temporary open space until they are subdivided in the future. Approximately 76 acres of the Tract 3694 VTM comprise a portion of the high-ground corridor along the San Joaquin River and Old River and were recently made available for development. High-ground corridors are, in effect, levees that are several hundred feet wide. The crown of a high-ground corridor/levee is approximately 300 feet wide. From the landward side of the levee crown, the high-ground corridor slowly slopes down over a

distance of roughly 1,000 feet or more. Because the high-ground corridors are so wide, homes, roads, utilities, and other structures may be placed on/in portions of the corridor without affecting flood-protection design standards.

In 2005, new levees were constructed within the Phase 1 area that removed approximately 900 acres from the 100-year floodplain. The Employment Center, Town Center, and East Village districts, and a portion of the Old River Road District, as shown in Exhibit 1-3, are included in this 900-acre area. Excavation of the initial portions of the Central Lake provided a majority of the fill necessary to build these levees. These new levees are accredited by the Federal Emergency Management Agency (FEMA) and are strong enough to protect against the 200-year annual exceedance probability (AEP) flood event (i.e., the 200-year flood) plus maintain 3 feet of additional levee freeboard. However, not all of these levees have sufficient dimensions to be considered high-ground corridors.

Along the San Joaquin River and Old River, the new levees were constructed adjacent to the existing federal levees protecting Stewart Tract, but were not integrated into nor were they connected with the federal levees. Where the Phase 1 levees and high-ground corridors are adjacent to the existing federal levee system, the levees created a "V-ditch" between the new and old levees. In what has been called Phase 2A of the River Islands Project, the V-ditch was filled, which created a connection between the applicant constructed levees and high-ground corridors and the adjacent federal levees. In these circumstances, the federal levee became the waterside surface of the high-ground corridor. Phase 2A did not include any development and consists only of earthwork associated with filling the V-ditch. However, filling the V-ditch provided land along the crown of the high-ground corridors. This land is available for development, which was proposed as part of Phase 1.

Filling of the V-ditch under Phase 2A was completed in December 2006 and was processed through an encroachment permit with the State Reclamation Board in accordance with Title 23 of the California Code of Regulations, and was subject to U.S. Army Corps of Engineers technical review under Section 208.10 of Title 33 of the Code of Federal Regulations (33 CFR 208.10). Phase 2A is a discrete, stand-alone phase that can exist on its own whether or not the remainder of Phase 2 of project development proceeds.

At the time the Tract 3491 VTM application was submitted and approved in 2005, authorization to fill the V-ditch had not been received; therefore, the land between the new levees and the existing federal levees was not available for development and was not included in the Tract 3491 VTM proposal. With filling of the V-ditch now approved by the State Reclamation Board and construction completed, portions of the crown of the high-ground corridor formed by the combination of the federal levee, V-ditch fill, and the new applicant constructed levees is available for development. The boundary of the Tract 3694 VTM encompasses this area to incorporate the newly available, developable acreage. This available acreage does not change the overall amount of land that may be developed as part of the River Islands Projects evaluated in the 2003 SEIR.



Tract 3694 Development Proposal

Exhibit 2-1

Regulations require that a corridor be maintained along the crowns of the high-ground corridors on the San Joaquin River and Old River where homes and similar structures cannot be constructed. This corridor would extend from the waterside edge of the crown to approximately 60-feet inland (based on a 15 foot difference between the elevation of the levee crown and the adjacent ground). This area would be developed as a linear park. Various facilities associated with public or private park and recreation uses such as trails, picnic areas, and restrooms are permitted in this corridor. In addition to this linear park, an additional 15 foot setback will be required for all habitable structures bordering the linear park, creating a total setback of 75 feet between the waterside crown of the levee and habitable structures.

All other features associated with the Tract 3694 VTM proposal (e.g., utilities, access) would remain evaluated in the existing SEIR and the previous addendum. In addition, all mitigation measures from the SEIR applicable to the Tract 3694 VTM location and activities would be applied. For detailed information pertaining to the these project features and mitigation measures refer to the SEIR for the River Islands at Lathrop Project, certified in January of 2003, and the addendum adopted in July of 2005.

2.6 PROJECT ELEMENTS UNIQUE TO THE TRACT 3694 VTM PROPOSAL

As stated above, the purpose of this Addendum is (1) to document minor changes in Phase 1 of the River Islands project as reflected in the Tract 3694 VTM proposal when compared to the River Islands project evaluated in the SEIR, the existing certified addendum to the SEIR, and current project approvals, and (2) to evaluate whether these differences result in new significant impacts, significant changes in the severity of previously identified environmental impacts, or significant changes in the effectiveness or applicability of mitigation measures and project alternatives.

The differences between the Tract 3694 VTM proposal and the River Islands project evaluated in the SEIR, the existing adopted addendum to the SEIR, and current project approvals are described below. These differences are divided into three categories: (1) project area, (2) housing unit mix, and (3) transportation network. These unique characteristics of the Tract 3964 VTM proposal are the focus of the environmental analysis provided in Chapter 3, "Affected Environment, Environmental Consequences, and Mitigation Measures."

2.6.1 PROJECT AREA

In the River Islands SEIR, Phase 1 of the project covered approximately 1,770 acres encompassing the Old River Road, Town Center, East Village, Lake Harbor, and Employment Center districts (Exhibit 1-3). The Tract 3491 VTM proposal modified the Phase 1 boundary to cover approximately 1,500 acres encompassing the East Village and Town Center districts and portions of the Old River Road, Lakeside, and Employment Center districts (Exhibit 1-3). The addendum evaluating the Tract 3491 VTM proposal found that these modifications did not result in new significant impacts or a substantial increase in the severity of previously identified significant impacts, or trigger other criteria requiring an SEIR or supplemental EIR (State CEQA Guidelines Sections 15162 through 15164).

The Tract 3694 VTM proposal covers approximately 1,793 acres and encompasses the East Village and Town Center districts and portions of the Old River Road, Lakeside, and Employment Center districts (Exhibit 2-1). The Tract 3694 VTM boundary generally corresponds to the Tract 3491 VTM boundary. However, along the San Joaquin River and Old River the boundary is expanded toward the rivers to encompass the recently filled V-ditch and the crown of the adjacent federal levees. These areas add approximately 76 acres to the Tract 3694 VTM area relative to the Tract 3491 VTM area and would support primarily residential and park uses. In addition, the Tract 3694 VTM includes additional lands located near Old River that are not proposed for development at this time and will remain temporary open space until these areas are subdivided in the future.

2.6.2 HOUSING UNIT MIX

The SEIR for the River Islands project identifies the development of 3,231 single-family housing units and 829 multifamily housing units (4,060 total housing units) at the completion of Phase 1; however these totals were adjusted to 3,226 single-family housing units and 1,058 multifamily housing units (4,284 total housing units) in subsequent entitlements/approvals. The Tract 3491 VTM proposal includes the development of 3,226 single-family housing units (4,284 total housing units), consistent with the unit count provided in the subsequent entitlements/approvals described above.

The Tract 3694 VTM proposal includes 3,741 single-family housing units and 543 multifamily housing units, for a total of 4,284 units. The total unit count is consistent with 4,284 units included in the subsequent entitlements and the Tract 3491 VTM, but the ratio of single-family units to multifamily units is altered. The Tract 3694 VTM proposal includes 515 fewer multifamily units (from 1,058 down to 543), and shifts these units to the single-family category. The split between single-family and multifamily units would be altered correspondingly during Phase 2 of project development to result in the 1,629 multifamily units and 9,371 single-family units (11,000 total units) identified in the SEIR at project buildout.

2.6.3 TRANSPORTATION NETWORK

The Tract 3694 VTM proposal includes several minor modifications to the internal transportation network when compared with the networks included in the SEIR and the Tract 3491 VTM. In comparing the roadways shown in Exhibits 1-2 (SEIR land use plan), 1-3 (Tract 3491 VTM), and 2-1 (Tract 3694 VTM), differences associated with the Tract 3694 VTM are primarily associated with residential streets and accommodate minor modifications to the lotting plan. One additional modification provides for the first collector road turning right off of Golden Valley

Parkway after crossing the San Joaquin River. In the SEIR and Tract 3491 VTM, this roadway, labeled as South River Islands Parkway on Exhibit 1-2, begins near the San Joaquin River and passes along the edge of a residential neighborhood as it enters the East Village district. Under the Tract 3694 VTM proposal, South River Islands Parkway begins farther to the southwest along Golden Valley Parkway and crosses a portion of the Central Lake to reach the East Village district. This new location and modified cross section for South River Islands Parkway was analyzed by TJKM Transportation Consultants (see Appendix A). The analysis found no adverse impacts with the realignment of South River Islands Parkway or its reconfiguration, which improves access to the project via Golden Valley Parkway.

3 AFFECTED ENVIRONMENT, ENVIRONMENTAL CONSEQUENCES, AND MITIGATION MEASURES

3.1 APPROACH TO ENVIRONMENTAL ANALYSIS

As stated previously in Section 1.2, "CEQA Guidelines Regarding the Addendum to the SEIR," the City has determined that, in accordance with Section 15164 of the State CEQA Guidelines, minor technical changes or additions to the SEIR and the Tract 3491 Vesting Tentative Map (VTM) for the River Islands project are necessary to address the Tract 3694 VTM proposal. Consequently, this second Addendum to the SEIR is prepared for the Tract 3694 VTM proposal.

To prepare an addendum to an EIR, as opposed to a subsequent EIR (SEIR) or a supplement to an EIR (Sections 15162 and 15163 of the State CEQA Guidelines), none of the conditions described in Section 15162 calling for preparation of a SEIR must have occurred. In summary, to prepare an addendum requires that the revised project or altered circumstances since approval of the previous CEQA document:

- ▶ will not result in any new significant environmental effects,
- ▶ will not substantially increase the severity of previously identified effects,
- will not result in mitigation measures or alternatives previously found to be infeasible being categorized as feasible, and
- will not 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.

The analysis of environmental effects provided below follows the general format used in the SEIR. The environmental analysis first evaluates for each environmental topic area (e.g., land use, traffic, air quality) whether there are any changes in the regulatory background, existing conditions, or circumstances in which the project is undertaken that would result in new or substantially more severe environmental impacts. The Addendum then evaluates the differences between the Tract 3694 VTM proposal and the prior River Islands project approvals that warrant minor changes or additions to the SEIR. In this instance prior project approvals encompass those associated with the SEIR and the Addendum prepared for the Tract 3491 VTM, and the term "SEIR" includes both the SEIR itself and the Addendum. The environmental effects of the project differences, if any, were then identified and an assessment was made as to whether these differences would result in new significant impacts, significant changes in the severity of previously identified environmental impacts, or

significant changes in the effectiveness or applicability of mitigation measures and project alternatives that would trigger the need for subsequent environmental review for the Tract 3694 VTM proposal based on the various criteria for subsequent environmental review included in Sections 15162 and 15164 of the State CEQA Guidelines.

3.2 LAND USE CONSISTENCY AND COMPATIBILITY

Since certification of the River Islands SEIR and related project approvals in 2003, and adoption of the Tract 3491 VTM in 2005, no changes to the regulatory background or existing conditions have occurred involving land use issues that would trigger the need for subsequent environmental review for the Tract 3694 VTM proposal.

Project land uses under the Tract 3694 VTM proposal are consistent with those included in the Tract 3491 VTM. Therefore, the land use comparison between the Tract 3491 VTM and the SEIR provided in the Tract 3491 VTM addendum would also apply to a comparison between the Tract 3694 VTM and the SEIR. In the addendum prepared for the Tract 3491 VTM, it was identified that in almost all cases, project land uses under the Tract 3491 VTM proposal are consistent with the land uses in the original project proposal evaluated in the SEIR. The primary differences between the two scenarios from a land use perspective are related to changes in phasing of some project elements and the configuration of Phase 1 of project development, and not to the type or location of land uses proposed as part of the overall project. Exceptions are the proposed locations for the Animal Campus site and the Lakeside community park (Exhibit 1-3), which are not included in the original SEIR and related approvals. However, these are not new land uses, but are adjustments to the timing and location of development of these uses. The Animal Campus sites and Lakeside community park do not conflict with any adopted land use plans or policies because they constitute permissible land uses within the planning and zoning areas where they are proposed. Similar conclusions apply to the Tract 3694 VTM, where the Lakeside Community Park has been relocated to the East Village District and potential locations of the Animal Campus have not changed from the 3491 VTM.

Because land uses included in the Tract 3694 VTM are considered consistent with those evaluated in the SEIR, they can also be considered consistent with the *Lathrop General Plan* and the WLSP just as the original VTM land uses were found to be consistent. The Tract 3694 VTM proposal would not require any additional amendments to these plans beyond those already approved for the River Islands project.

In summary, any differences between the Tract 3694 VTM proposal and the previously approved development proposals Tract 3491 VTM and SEIR are considered minor and would not result in new significant land use impacts, significant changes in the severity of previously identified land use impacts, or significant changes in the effectiveness or applicability of mitigation measures and project alternatives related to land use.

3.3 POPULATION, EMPLOYMENT, AND HOUSING

Since certification of the River Islands SEIR and related project approvals in 2003, and adoption of the Tract 3491 VTM in 2005, no changes to the regulatory background or existing conditions relative to population, employment, and housing have occurred that trigger the need for subsequent environmental review of the Tract 3694 VTM proposal.

The SEIR and previous addendum identify impacts related to population growth and housing demand during project construction as being less than significant. The extent, type, and pace of development are basically the same under both the Tract 3694 VTM proposal and the development scenario described in the SEIR and previous addendum. Therefore, the number of construction jobs generated by project development during peak construction periods would not be appreciably different between the various scenarios. Impacts related to population growth and housing demand during project construction would remain less than significant under the Tract 3694 proposal.

The Tract 3694 VTM proposal includes the same total number of housing units as identified in existing project approvals (4,284 units), but has a higher number of single-family units relative to multifamily units. Previous project approvals include 3,226 single-family units and 1,058 multifamily units. The Tract 3694 VTM proposal includes 3,741 single-family units, and 543 multifamily units. This results in 515 more single-family units and 515 fewer multifamily units at the completion of Phase 1 of the River Islands project than in previous project approvals. The split between single-family and multifamily units would be altered correspondingly during Phase 2 of project development to result in the 1,629 multifamily units and 9,371 single-family units (11,000 total units) identified in the SEIR at project buildout. Therefore, the difference in unit mix associated with the Tract 3694 VTM would only apply to Phase 1 of the project.

Based on average occupancy rates provided in the SEIR (3.2 persons per dwelling unit for single-family residential and 2.5 persons per dwelling unit for multifamily residential), the housing units included in Phase 1 in the previous project approvals would result in a population of 12,968 individuals. The Tract 3694 VTM would result in a population of 13,329 individuals. This results in 361 more persons than in previous project approvals, or an increase of approximately 2.8%. Although the Phase 1 project population would be slightly higher and the number of multifamily units slightly lower under the Tract 3694 VTM proposal, impacts related to population growth and inconsistency with City housing policies, which are identified as less than significant in the SEIR, would remain less than significant under the Tract 3694 proposal.

Job-generating land uses under both the Tract 3694 VTM proposal and the SEIR and previous addendum would be concentrated in the Town Center and Employment Center. Under all three scenarios, full buildout of the Town

Center is assumed during Phase 1, and 107 acres of developable Employment Center area is assumed to be occupied by the end of Phase 1 based on an office absorption analysis prepared for the project (City of Lathrop 2003). Therefore, the Tract 3694 VTM development proposal would have approximately the same employee-generation potential as the Tract 3491 VTM and SEIR development scenarios. As described above, the Tract 3694 VTM proposal also includes the same total number of housing units as the Tract 3491 VTM and SEIR development scenarios. Therefore, impacts related to generation of housing demand, which are identified as less than significant in the SEIR and previous addendum, would remain less than significant under the Tract 3694 proposal.

Although the boundary of the Phase 1 development area under the Tract 3694 VTM development proposal is somewhat different from that described in the SEIR or the Tract 3491 VTM, the differences do not result in substantial changes in the project that would result in new significant or substantially more sever impacts on existing housing. This is because the Tract 3694 VTM proposal would not result in any additional existing housing units being displaced beyond what is identified in the SEIR or previous addendum. Impacts related to housing displacement are considered less than significant in the SEIR (less than 10 existing residences would be displaced), remained less than significant under the Tract 3491 VTM proposal, and would also be less than significant under the Tract 3694 VTM proposal.

In summary, any differences between the Tract 3694 VTM proposal and the previously approved development proposals (SEIR and Tract 3491) are considered minor and would not result in new significant impacts related to population, employment, and housing; significant changes in the severity of previously identified impacts related to population, employment, and housing; or significant changes in the effectiveness or applicability of mitigation measures and project alternatives related to population, employment, and housing; significant changes in the effectiveness or applicability of mitigation measures and project alternatives related to population, employment, and housing.

3.4 TRAFFIC

Since certification of the River Islands SEIR and related project approvals in 2003, and adoption of the Tract 3491 VTM in 2005, no changes to the regulatory background relative to traffic have occurred that trigger the need for subsequent environmental review of the Tract 3694 VTM proposal.

Some changes to existing traffic conditions have occurred since completion of the SEIR in 2003 and adoption of the Tract 3491 VTM in 2005, in that some planned transportation infrastructure improvements have been implemented and some traffic generating land uses have been developed since that time. However, these changes are consistent with the traffic model assumptions used in the SEIR and would not alter the results of the model or the impact analysis for the Tract 3694 VTM proposal.

As described in the previous addendum (see Section 2.5.3, "Traffic and Vehicular Access"), the City is leading development of the Bradshaw's Crossing bridge rather than the project applicant because the bridge is part of the City's planned regional transportation network as described in the City's Capital Facility Fee (CFF) program. However, the City's role in completion of this planned regional transportation infrastructure element does not have the potential to increase traffic impacts.

Therefore, although some conditions relative to traffic and transportation have changed since completion of the SEIR and the previous addendum, these changes would not result in new significant or substantially more severe traffic impacts which would require subsequent environmental review to assess the impacts of the Tract 3694 VTM proposal.

As described above in Section 3.3, "Population, Employment, and Housing," the Tract 3694 VTM proposal has the same total number of housing units and type and extent of job-generating land uses as assumed in the SEIR and Tract 3491 VTM. Although the Tract 3694 VTM is expected to have approximately 361 additional residents because of an increased number of single-family residential units relative to multifamily units, this small increase in Phase 1 population relative to the past development scenarios (an approximately 2.8% increase) would not result in degradations of level of service (LOS) below acceptable levels. (See the evaluation of traffic conditions provided in Appendix A.) The type and extent of other land uses are also approximately the same among the SEIR, Tract 3491 VTM, and Tract 3694 VTM development scenarios. Therefore, traffic generation attributable to the Tract 3694 VTM proposal should not be appreciably different from that described in the SEIR and previous addendum, and the project would not result in new or substantially more severe traffic impacts.

Locations and methods for accessing the project site, for both construction and operational traffic, are the same under all three development scenarios evaluated. However, the on-site circulation system under the Tract 3694 VTM scenario is slightly different than the system described in the SEIR and Tract 3491 VTM scenarios. As discussed above in Section 2.6, "Project Elements Unique to the Tract 3694 VTM Proposal," the Tract 3694 VTM proposal includes various modifications to residential streets to accommodate minor alterations to the lotting plan. In addition, the South River Islands Parkway/Golden Valley Parkway intersection is moved to the southwest and a portion of the South River Islands Parkway alignment is modified to account for this change. Other than these changes, the Tract 3694 VTM proposal includes the same arterial and collector roads as past development proposals and follows the same principals/policies for minor streets. As indicated in a letter from the traffic engineers evaluating the project (see Appendix A), the modifications to the transportation network described above would not alter LOS parameters for the project and would not alter impact conclusions included in the SEIR or previous addendum. Because traffic generation and planned infrastructure under the Tract 3491 VTM proposal would not represent a substantial change resulting in new significant or substantially more severe traffic impacts when compared to the impacts described in the SEIR or previous addendum, all traffic impacts and significance conclusions regarding these impacts identified in the SEIR and previous addendum would also apply to the Tract 3694 VTM proposal. In addition, the same traffic mitigation measures applicable to Phase 1 development in the SEIR would apply to the Tract 3694 VTM proposal and would have the same affect on reducing significant impacts to less-thansignificant levels.

Implementation of the Tract 3694 VTM proposal would not result in any new significant traffic impacts, significant changes in the severity of previously identified traffic impacts, or significant changes in the effectiveness or applicability of mitigation measures and project alternatives related to traffic.

3.5 AIR QUALITY

Since certification of the River Islands SEIR and related project approvals in 2003, and adoption of the Tract 3491 VTM in 2005, no changes to the regulatory background or existing conditions relative to air quality have occurred that trigger the need for subsequent environmental review of the Tract 3694 VTM proposal.

As mentioned above in Section 3.3, "Population, Employment, and Housing," and described elsewhere in this document, the extent, type, and pace of development are basically the same under the Tract 3694 VTM as under the development scenarios described in the SEIR and previous addendum. Impacts related to emissions of regional criteria pollutants during construction, potential for increases in odorous emissions, and increases in stationary-source toxic air contaminants would not be appreciably different between the scenarios described in the previous documentation and the Tract 3694 VTM proposal and would not result in new or substantially more severe air quality impacts relative to these impact mechanisms. Impacts considered significant in the SEIR and previous addendum related to construction emissions would remain significant under the Tract 3694 proposal, and the same mitigation measures identified in the SEIR would reduce these impacts to less-than-significant levels. Impacts related to odorous emissions and stationary-source toxic air contaminants, which are considered less than significant in the SEIR and previous addendum, would remain less than significant under the Tract 3694 VTM proposal.

As described above in Section 3.4, "Traffic," traffic generation and overall traffic impacts under the Tract 3694 VTM proposal would not be appreciably different from those identified in the SEIR and previous addendum. Although there would be approximately 361 additional residents during Phase 1 of the River Islands project under the Tract 3694 VTM proposal, this small increase in Phase 1 population relative to the past development scenarios (an approximately 2.8% increase) would not result in new or substantially more severe traffic impacts (see

Appendix A). Therefore, air quality impacts related to mobile source emissions would also not be appreciably different between the Tract 3694 VTM proposal and previous development scenarios, and the Tract 3694 VTM would not result in new or substantially more severe air quality impacts relative to this impact mechanism. Specifically, impacts related to mobile-source toxic air contaminants, which are identified as potentially significant in the SEIR and previous addendum, would remain potentially significant under the Tract 3694 VTM proposal. The SEIR determines that the only available mitigation for this impact, completely separating diesel vehicles from all sensitive receptors, is not feasible. This conclusion did not change under the Tract 3491 VTM and does not change under the Tract 3694 VTM proposal. Impacts related to local mobile-source carbon monoxide concentrations are considered less than significant in the SEIR and previous addendum, and would remain less than significant under the Tract 3694 VTM proposal.

In the SEIR and previous addendum, both stationary- and mobile-source emissions are considered in the discussion of impacts related to increases in long-term regional emissions and consistency with air quality plans. As described above, both stationary- and mobile-source emissions under the Tract 3694 VTM proposal do not differ substantially from those described in the SEIR and previous addendum and would not result in new or substantially more severe air quality impacts relative to these impact mechanisms. Therefore, impacts resulting from increases in long-term regional emissions, which are considered significant and unavoidable in the SEIR and previous addendum, would also be significant and unavoidable under the Tract 3694 VTM proposal. Impacts related to consistency with air quality plans are considered less than significant in the SEIR and previous addendum, and would remain less than significant under the Tract 3694 VTM proposal.

Implementation of the Tract 3694 VTM proposal would not result in any new significant air quality impacts, significant changes in the severity of previously identified air quality impacts, or significant changes in the effectiveness or applicability of mitigation measures and project alternatives related to air quality.

3.6 NOISE

Since certification of the River Islands SEIR and related project approvals in 2003, and adoption of the Tract 3491 VTM in 2005, no changes to the regulatory background or existing conditions relative to noise have occurred that trigger the need for subsequent environmental review of the Tract 3694 VTM proposal.

As described previously, the extent, type, and pace of development are basically the same under the Tract 3694 VTM proposal as under the development scenarios described in the SEIR and the previous addendum. In addition, traffic generation and overall traffic impacts under the Tract 3694 VTM proposal would not be appreciably different from those identified in the SEIR and previous addendum, and the Tract 3694 VTM proposal would not result in new or substantially more severe traffic impacts. Therefore, noise generation from construction activities,

stationary sources, and mobile sources under the Tract 3694 VTM proposal also would not be appreciably different from noise generation sources identified in the SEIR and previous addendum, and the Tract 3694 VTM proposal would not result in new or substantially more severe noise impacts relative to these impact mechanisms. Impacts related to construction noise and stationary noise generated by on-site land uses, which are considered significant in the SEIR and previous addendum, would also be significant under the Tract 3694 VTM proposal. The same mitigation measures identified in the SEIR would reduce these impacts to less-than-significant levels. Impacts related to increases in traffic noise levels are considered less than significant in the SEIR and previous addendum, and would remain less than significant under the Tract 3694 VTM proposal.

The SEIR and previous addendum identify a significant and unavoidable noise impact resulting from some project areas potentially being exposed to exterior noise levels exceeding City standards. This condition is created by existing noise sources, primarily Interstate 5 (I-5) and the Union Pacific Railroad (UPRR) line along the projects southeastern boundary. Exterior areas around homes on high-ground corridors near I-5 and the Head of Old River are considered most likely to be exposed to this impact. Tract 3694 VTM proposes to construct housing on high-ground corridors, specifically along the San Joaquin River and Old River portion of the site, including near I-5 and the Head of Old River. Therefore, the significant and unavoidable noise impact identified in SEIR would occur under the Tract 3694 VTM proposal. However, the nature and severity of the impact would not be altered because the same type and extent of development on high-ground corridors is proposed under all project scenarios.

Implementation of the Tract 3694 VTM proposal would not result in any new significant noise impacts, significant changes in the severity of previously identified noise impacts, or significant changes in the effectiveness or applicability of mitigation measures and project alternatives related to noise issues.

3.7 GEOLOGY, SOILS, AND MINERAL RESOURCES

Since certification of the River Islands SEIR and related project approvals in 2003, and adoption of the Tract 3491 VTM in 2005, no changes to the regulatory background or existing conditions relative to geology, soils, and mineral resources have occurred that trigger the need for subsequent environmental review of the Tract 3694 VTM proposal.

The Tract 3694 VTM proposal includes the same land uses and development types as those analyzed in the SEIR and previous addendum. Therefore, risks associated with seismic hazards; including ground shaking, liquefaction, ground lurching, soil settlement, lateral spreading, and landslide; would not be appreciably different between the three development scenarios and the Tract 3694 VTM proposal would not result in new or substantially more severe geology, soils, and mineral resources impacts relative to these impact mechanisms. Potential for damage to

project facilities resulting from shrink-swell soils and corrosive soils also would not be appreciably different between the three development scenarios and the Tract 3694 VTM proposal would not result in new or substantially more severe geology, soils, and mineral resources impacts relative to these impact mechanisms. Impacts identified in the SEIR and previous addendum related to seismic hazards, shrink swell-soils, and corrosive soils; the level of significance of those impacts (before and after mitigation); and applicable mitigation measures, would also apply to the Tract 3694 VTM proposal.

The areas identified for the Tract 3694 VTM proposal, the Tract 3491 VTM proposal, and for Phase 1 of project development in the SEIR cover the same approximately 5-acre area of potentially significant sand deposits designated as MRZ-2 by the California Department of Conservation, Division of Mines and Geology (CDMG). The impact of the loss of access to this area after project development, which is considered less than significant in the SEIR and the previous addendum, would be the same under the Tract 3694 VTM scenario.

Impacts related to construction-related soil erosion would occur under the Tract 3694 VTM proposal, the Tract 3491 VTM proposal, and the development scenario identified in the SEIR. In the SEIR and previous addendum, this impact is considered less than significant. The potential for construction-related soil erosion would not substantially increase under the Tract 3694 development proposal, compared to Phase 1 development described in the SEIR and previous addendum. Therefore, this impact would remain less than significant under the Tract 3694 VTM proposal.

Implementation of the Tract 3694 VTM proposal would not result in any new significant impacts related to geology, soils, and mineral resources; significant changes in the severity of previously identified impacts related to geology, soils, and mineral resources; or significant changes in the effectiveness or applicability of mitigation measures and project alternatives related to geology, soils, and mineral resources.

3.8 HYDROLOGY AND WATER QUALITY

Since certification of the River Islands SEIR and related project approvals in 2003, and adoption of the Tract 3491 VTM in 2005, no changes to the regulatory background relative to hydrology and water quality have occurred that trigger the need for subsequent environmental review of the Tract 3694 VTM proposal.

As described in the previous addendum for the Tract 3491 VTM, since completion of the SEIR, a pedestrian/bicycle bridge has been constructed across the San Joaquin River adjacent to the existing Manthey Road bridge. Several utility pipelines supporting the River Islands project, including a natural gas pipeline, have been installed within the bridge across the San Joaquin River. Therefore, hydrology and water quality impacts identified in the SEIR related to directional boring of a natural gas pipeline under the San Joaquin River will not occur. In addition, since completion of the SEIR, the City has taken the lead role in construction of the

Bradshaw's Crossing bridge as an element of the planned regional transportation network. The bridge would be constructed independent of the development of the River Islands project and would no longer be attributed to the River Islands project (although impacts associated with bridge construction and operation and the associated regional roadway network were previously evaluated in the River Islands SEIR and the Mossdale Landing EIR).

The previous addendum evaluating the Tract 3491 VTM proposal identified a less-than-significant impact related to the potential passage of flood waters through the V-ditch if one of the federal levees protecting Stewart Tract were to breach (Archer 2005). The V-ditch is described in Section 2.5, "Project Description." Because filling of the V-ditches was completed in winter 2006, this impact could no longer occur. The Reclamation Board evaluated the filling of the V-ditch and any encroachments authorized under the encroachment permits issued by the board in June and July 2006 and found that the filling of the V-ditch and encroachments would not result in any new significant flood control impacts.

No other changes to existing conditions have occurred since certification of the SEIR and adoption of the Tract 3491 VTM that would result in the Tract 3694 VTM proposal causing a new significant or substantially more severe effect on hydrology and water quality or influence or trigger the need for subsequent environmental review of the Tract 3694 VTM proposal.

Impacts related to construction sediment in the project-development area contributing to water quality contamination would occur under the Tract 3694 VTM proposal, the Tract 3491 VTM proposal, and the development scenario identified in the addendum to the SEIR. In the SEIR and previous addendum, this impact is considered potentially significant and is reduced to a less-than-significant level with mitigation. This impact would still be considered potentially significant under the Tract 3694 VTM proposal, and the same mitigation measures would be implemented as part of the Tract 3694 VTM to reduce the impact to less-than-significant levels.

The Tract 3491 VTM proposal neither includes project activities along, nor affects the existing levees adjacent to the San Joaquin River, Old River, and Paradise Cut. The Tract 3694 VTM proposal includes limited activities near the existing levees through development on the crowns of the high-ground corridors. However, under the Tract 3694 VTM proposal, project elements such as back bays, river boat docks, installation of new water intakes and outfalls, and breaching of existing levees after setback levees are constructed would all be deferred until Phase 2 of project development. Under the development proposal identified in the SEIR, a portion of these activities would take place during Phase 1 of project development. Because the Tract 3694 VTM proposal only includes development of Phase 1 of the River Islands project, and defers construction of most riverside elements until Phase 2 of project development, impacts related to these elements identified in the SEIR would not occur during implementation of the Tract 3694 VTM proposal. These impacts include earth-moving activities in water

bodies, in-water project features, maintenance dredging of back bays, and increased boat traffic. However, at full buildout of the River Islands project under the Tract 3694 proposal and the development scenario described in the SEIR, all the same levee, high-ground, and in-water features would be constructed. Therefore, at full buildout of the River Islands project, the Tract 3694 proposal and the development scenario described in the SEIR would have the same impacts related to these project elements.

The Tract 3694 VTM proposal, the Tract 3491 VTM proposal, and the development scenario identified in the SEIR use a portion of the Central Lake and the Grand Canal during Phase 1 of project development to detain stormwater before discharging it to Paradise Cut. The same stormwater best management practices (BMPs) would be implemented under all three scenarios, such as use of grassy swales and water treatment wetlands adjacent to the stormwater detention water bodies to treat stormwater before it reaches the detention areas. In the case of the water treatment wetlands, water from the stormwater detention water bodies would be regularly cycled through the treatment wetlands to maintain water quality in the detention water bodies.

Under the development scenario analyzed in the SEIR, Phase 1 of project development would include approximately 200 acres of water features to be used for stormwater treatment and management (i.e., Central Lake, Grand Canal, water treatment wetlands. This area, in conjunction with other stormwater BMPs, was considered sufficient to:

- ► detain project-generated stormwater volumes consistent with regulatory standards,
- maintain interior lake water quality to such a level that water quality impacts associated with discharges from the lake to the Delta would be considered less than significant, and
- allow a lake-level management regime such that diversions to the lake from the Delta and discharges from the lake to the Delta would result in less-than-significant, and in some cases beneficial, impacts related to Delta hydrology and water quality.

The Tract 3491 VTM proposal includes approximately 79 acres of water features to be used for stormwater treatment and management; these include the proposed 15.6-acre northern lake in the Lakeside District, 13.8 acres of the Grand Canal, 35.2 acres of the Central Lake, and a total of 14.3 acres of treatment wetlands located along the shore of the northern lake and the Central Lake. The addendum prepared for the Tract 3491 VTM included an analysis of hydrology and water quality relative to the stormwater management and treatment system included in the Tract 3491 VTM proposal. The analysis concluded that the Tract 3491 VTM system would meet the same criteria as the system considered in the SEIR, relative to regulatory standards for volume of detention, impacts on water quality being considered less than significant, and hydrologic and water quality impacts related to diversions to, and discharges from, the water system being considered less than significant. The stormwater

management and treatment system included in the Tract 3694 VTM proposal is effectively the same as for the Tract 3491 VTM proposal, except for covering a larger area, approximately 102.8 acres, and having less acreage of water treatment wetlands. Because of the larger size of the internal water system, the same conclusions regarding meeting regulatory standards for volume of detention and hydrologic impacts being considered less than significant would apply. Stormwater management capacity is also discussed below in Section 3.11, "Public Utilities."

In regards to water quality, the total area of water treatment wetland/bio-retention basin included in the Tract 3694 VTM proposal is 10.8 acres, versus the 14.3 acres proposed in Tract 3491 VTM. The prior addendum noted that the SEIR had confirmed that 0.125 acres of treatment wetland per acre of water body to be treated was adequate to maintain the water quality of the interior lakes and canals. The 10.8 acres of constructed wetlands/bio-retention basins included in the Tract 3694 VTM would treat 92 acres of interior lakes and canals, resulting in 0.117 acres of treatment wetland/bio-retention per acre of water body to be treated. This provides a ratio of water treatment wetland to water body to be treated approximately 6% less than suggested in the SEIR. This reduction is due in large part to the increased lake area provided in the Tract 3694 VTM. The reduced proportion of water treatment wetlands is still considered sufficient to maintain adequate water quality standards for two primary reasons. First, additional bio-retention elements have been incorporated into the water quality treatment regime, improving the quality of stormwater entering the internal lakes and canals. Second, the larger area of the internal water bodies relative to the area of development provide increased water quality management functions for the urban area to be drained. Therefore, the same water quality conclusions in the SEIR and previous addendum regarding meeting regulatory standards and impacts being considered less than significant would apply to the Tract 3694 VTM.

The project, as described in the SEIR, removes the entire River Islands Development (RID) Area (i.e., all new urban development associated with the proposed project) from the 100-year floodplain during Phase 1 of project development. This is considered a beneficial impact in the SEIR, relative to flood protection. Under the Tract 3491 VTM proposal analyzed in the previous addendum, and the Tract 3694 VTM proposal analyzed in this Addendum, sufficient flood protection features were completed during Phase 1 to remove the tract areas from the 100-year floodplain. Although under the Tract 3491 VTM and Tract 3694 VTM proposals a smaller area would be provided increased flood protection during Phase 1 of project development, compared to the development scenario in the SEIR, impacts associated with providing additional flood protection would still be considered beneficial because areas currently within the FEMA 100-year floodplain (the Tract 3491 and 3694 VTM areas) would be removed from the floodplain. During Phase 2 of project development under the Tract 3491 and 3694 VTM proposals, the same flood control system described in the SEIR would be in place, resulting in the entire RID Area being removed from the 100-year floodplain, just as described in the SEIR.

The flood protection system included in the Tract 3694 VTM proposal is the same as that described in the previous addendum for the Tract 3491 VTM proposal, with the exception of the V-ditch along the San Joaquin River and Old River being filled (see Section 2.5, "Project Description" for a discussion of filling of the V-ditch). In the previous addendum, the Tract 3491 VTM proposal was found to have no effect, or less than significant effects related to Stewart Tract flood risk, passage of flood waters from the Reclamation District (RD) 2107 area through the RID Area, modifications to the flood storage capacity of the RID Area, and nonflood hydrology of Paradise Cut (Archer 2005). The Addendum prepared for the Tract 3491 VTM proposal should be reviewed for a detailed analysis of these potential impacts and rational for a less-than-significant conclusion. Because the levees associated with the Tract 3694 VTM proposal follow the same alignment as the Tract 3491 VTM levees, the same less-than-significant conclusions would apply to the Tract 3694 VTM proposal.

The SEIR identifies a potentially significant impact related to excavations during construction intersecting shallow groundwater, resulting in releases of sediments or contaminants into the groundwater. This impact is considered less than significant after mitigation. As described previously, the extent, type, and pace of development is basically the same under the Tract 3694 VTM proposal, the Tract 3491 VTM proposal, and the SEIR development scenario described in the previously adopted addendum. Therefore, the potential for adverse effects to groundwater during construction of the Tract 3694 VTM proposal would not differ substantially from what is described in the previous addendum, and the same mitigation measures identified in the SEIR would also reduce this impact to a less-than-significant level under the Tract 3694 VTM proposal.

The SEIR and previous addendum also identify potential impacts to groundwater quality through contaminants entering groundwater via the Central Lake and the human-made Paradise Cut Canal and increases in total dissolved solids (TDS) in City wells resulting from withdrawals of groundwater to serve the River Islands project. These impacts are all considered less than significant in the SEIR and previous addendum. The Tract 3694 VTM proposal would have the same area of human-made water bodies as the Tract 3491 VTM, and a smaller area of human-made water bodies relative to the Phase 1 development assumed in the SEIR; therefore, potential impacts to groundwater quality from operation of these water bodies, which are considered less than significant for the SEIR and Tract 3491 VTM scenarios, would remain less than significant for the Tract 3694 VTM scenario. The Tract 3694 VTM proposal includes the same, or similar, amounts of water-consuming land uses (homes, commercial, schools) as described for Phase 1 development in the SEIR and the Tract 3491 VTM. Demand for potable water under the Tract 3694 VTM proposal would not differ substantially from what is assumed in the SEIR and previous addendum; therefore, potential impacts to groundwater at City wells from withdrawals to support the Tract 3694 VTM proposal would be similar to those described in the SEIR and previous addendum and would be less than significant.

An impact related to water consumption resulting from the River Islands project making water unavailable to other users is also identified in the SEIR and previous addendum. The impact is considered less-than-significant. Because the Tract 3694 VTM proposal includes the same or similar amounts of water-consuming land uses as described for Phase 1 development in the SEIR and the Tract 3491 VTM, there would not be a substantial change in the demand for potable water under the Tract 3694 VTM proposal compared to the demand assumed in the SEIR and previous addendum. Therefore, under the Tract 3694 VTM proposal there would be no new significant or substantially more severe impacts related to water consumption potentially affecting other water users compared to those described in the SEIR and previous addendum, and the impacts would be less than significant.

In summary, implementation of the Tract 3694 VTM proposal would not result in any new significant impacts related to hydrology and water quality, significant changes in the severity of previously identified impacts related to hydrology and water quality, or significant changes in the effectiveness or applicability of mitigation measures and project alternatives related to hydrology and water quality.

3.9 HAZARDOUS MATERIALS AND PUBLIC HEALTH

Since certification of the River Islands SEIR and related project approvals in 2003, and adoption of the Tract 3491 VTM in 2005, no changes to the regulatory background or existing conditions relative to hazardous materials and public health have occurred that would trigger the need for subsequent environmental review of the Tract 3694 VTM proposal.

The SEIR and previous addendum identify hazardous materials and public health impacts related to storage, use, and transport of hazardous materials during project construction and operation (less than significant); potential exposure of construction workers, residents, and others to hazardous materials that may currently be on the project site (significant); and use of recycled water to irrigate public areas at the project site (less than significant). The single significant impact among these three identified in the SEIR and previous addendum, the potential exposure of construction workers, residents, and others to hazardous materials that may currently be on the project site, would be reduced to a less-than-significant level with mitigation.

The Tract 3694 VTM proposal would basically implement the same type, extent, and pace of development as described in the SEIR and previous addendum. No new land uses would be developed or different construction methods used that would result in additional storage, use, transport, or generation of hazardous materials. Therefore, the less-than-significant impact in the SEIR and previous addendum related to this topic would remain less than significant under the Tract 3694 VTM proposal.

Similarly, because there would be no substantial changes in the land uses and construction methods under the Tract 3694 VTM proposal compared to those included in the SEIR and Tract 3491 VTM development scenarios,

the Tract 3694 VTM proposal would not result in any new significant or substantially more severe impacts related to potential exposure of construction workers, residents, and others to hazardous materials that may currently be present on the project site. This impact would be considered significant under the Tract 3694 VTM proposal and would be reduced to a less-than-significant level using the same mitigation measures identified in the SEIR.

Finally, the Tract 3694 VTM proposal would include the same uses of recycled water for irrigation of public landscaping as identified in the SEIR and previous addendum. Therefore, potential health risk impacts associated with the use of recycled water, which are considered less than significant in the SEIR and previous addendum, would also be considered less than significant under the Tract 3694 VTM proposal.

Implementation of the Tract 3694 VTM proposal would not result in any new significant impacts related to hazardous materials and public health, significant changes in the severity of previously identified impacts related to hazardous materials and public health, or significant changes in the effectiveness or applicability of mitigation measures and project alternatives related to hazardous materials and public health.

3.10 PUBLIC SERVICES

Since certification of the River Islands SEIR and related project approvals in 2003, and adoption of the Tract 3491 VTM in 2005, no changes to the regulatory background or existing conditions relative to public services have occurred that would trigger the need for subsequent environmental review of the Tract 3694 VTM proposal.

The SEIR and previous addendum identify public service impacts related to obstruction of roadways during construction that potentially slowing emergency vehicle access, increased demand for fire protection facilities and services, increased demand for water-related emergency facilities and services, increased demand for water flows for fire suppression (fire flow), increased demand for police protection facilities and services, increased demand for animal control facilities and services, and increased demand for school facilities and services. All of these impacts are considered significant and would be reduced to a less-than-significant level with mitigation. The SEIR and previous addendum also identify a public services impact related to increased generation of solid waste and an associated increase in demand for landfill capacity. However, this impact is considered less than significant.

The Tract 3694 VTM proposal would implement the same type, extent, and pace of development as described in the SEIR and the previous addendum, with a similar roadway network and similar methods of construction access (See Section 3.4, "Traffic"). Therefore, impacts related to obstruction of roadways during project construction slowing emergency vehicle access would not be appreciably different between the three development scenarios (i.e., SEIR, Tract 3491 VTM, and Tract 3694 VTM) and the Tract 3694 VTM proposal would not result in new or substantially more severe impacts related to this issue. The impact would be significant under all three

development scenarios and the same mitigation measure that reduces the impact to a less-than-significant level in the SEIR and the previous addendum would also reduce the impact to a less-than-significant level under the Tract 3694 VTM proposal.

Demand for fire protection, police protection, and public school facilities is calculated in the SEIR using the estimated project population, which is calculated using the number and type of housing units included in the project. Because the Tract 3491 VTM proposal (the proposal evaluated in the previous addendum) includes the same number and type of housing units as Phase 1 of development described in the existing project approvals, project population and demand for fire and police protection and public school facilities would be the same under the two scenarios. However, as described previously in Section 3.3, "Population, Employment, and Housing," the Tract 3694 VTM proposal includes a higher ratio of single-family dwelling units relative to multifamily units, resulting in a projected population with 361 more individuals than estimated in past project approvals or the Tract 3491 VTM (13,329 individuals rather than 12,968 individuals). This higher population estimate could result in additional impacts related to demand for fire protection, police protection, and public school facilities, which are evaluated further below.

Unlike the analysis of demand for fire protection services provided in the SEIR, the planned approach for providing fire protection described in the previous addendum for the Tract 3491 VTM is tied to maintaining response times rather than population numbers. All RID scenarios require provision of 3–4 minute response times. For the Tract 3491 VTM and the Tract 3694 VTM, these response times would be achieved through operation of the new Mossdale Landing Fire Station (Fire Station 34), then construction of a fire station on the River Islands project site. As described in the previous addendum, this approach can maintain 3-4 minute response times for the Tract 3491 VTM development scenario. Because the size of the Tract 3694 VTM area is almost the same as the Tract 3491 VTM area, as are the type and distribution of development, 3–4 minute response times achievable under the Tract 3491 VTM would also be achieved for the Tract 3694 VTM. Because the same fire protection service criteria (3-4 minute response times) can be maintained for all three project scenarios (SEIR, Tract 3491 VTM, and Tract 3694 VTM), impacts related to fire protection services would not be appreciably different among the three scenarios and the Tract 3694 VTM proposal would not result in new or substantially more severe impacts related to this issue. The same mitigation measure that reduces this significant impact to a less-thansignificant level in the SEIR and previous addendum would reduce the impact to a less-than-significant level under the Tract 3694 VTM proposal. It should be noted that the direct and secondary environmental affects of construction and operation of the Mossdale Landing Fire Station were evaluated in the EIR prepared for the Mossdale Landing project.

The SEIR development scenario, the Tract 3491 VTM proposal, and the Tract 3694 VTM proposal all include the same plans for provision of police protection services: a single City police station outside the River Islands project site. Because methods to provide police protection services are the same under all three scenarios, impacts related to police protection services would not appreciably differ between the three scenarios if the available services can meet project demand. The 12,968 individuals associated with the Tract 3491 VTM proposal and past project approvals associated with the SEIR for Phase 1 of development would generate demand for approximately 18 additional police officers to maintain existing levels of service (1.4 officers per 1,000 residents). This is considered a significant impact. However, these officers could be accommodated in the new police station, and a mitigation measure in the SEIR that requires funding for startup costs for hiring, training, and equipping these officers reduces this impact to a less-than-significant level. The 13,329 individuals associated with the Tract 3694 VTM proposal would generate demand for approximately 19 additional police officers to maintain existing levels of service. This is one more officer than would be needed to serve the development scenarios associated with the Tract 3491 VTM and prior project approvals. Demand for 19 new police officers is also considered a significant impact. However, these officers could be accommodated in the new police station, and the same mitigation measure from the SEIR requiring funding for startup costs for hiring, training, and equipping these officers would reduce this impact to a less-than-significant level under the Tract 3694 VTM scenario.

The analysis of school facilities in the SEIR focuses on the nontraditional school system (three K–12 campuses at full project buildout), but also evaluates impacts using a traditional school model (K–5 elementary schools, 6–8 middle schools, and 9–12 high schools). The SEIR determined that during Phases 1a and 1 of project development the nontraditional school system would not provide sufficient facilities to meet projected demand and considered this a significant impact. However, as described in the SEIR, the traditional school system would be able to meet projected demand during Phases 1a and 1 because of the ability to build smaller, but more numerous schools incrementally as numbers of students increased.

The Tract 3491 VTM and Tract 3694 VTM proposals include only a traditional school model, consisting of two K–5 schools, one 6–8 middle school, and temporary high school facilities (as needed) to be provided at each of these schools. The middle school and one K–5 school would be located on the 31-acre Town Center school site identified in the SEIR. The 31-acre Town Center school is estimated to have the capacity to accommodate 2,000–2,400 students in the SEIR, and this same capacity assumption is used here for the combined K–5 and 6–8 school under the Tract 3491 VTM and Tract 3694 VTM proposals. The SEIR does not provide student capacity estimates for individual K–5 and 6–8 schools, but combines these into K–8 schools that are assumed to have the capacity to accommodate up to 750 students. For purposes of this Addendum to the SEIR, it is assumed that the second K–5 school included in the Tract 3491 VTM and Tract 3694 VTM proposals could accommodate approximately 500 students (750 students × 0.67). Combining all schools, the Tract 3491 VTM and Tract 3694

VTM proposals could accommodate 2,500–2,900 combined K–5 elementary school, 6–8 middle school, and 9–12 high school students.

Using the same student-generation rates for single-family and multifamily housing units identified in the SEIR, the Tract 3694 VTM proposal would have approximately 3,052 students living in the project area—1,698 K–5 students, 661 6-8 middle school students, and 693 9–12 high school students. The planned school capacity of up to 2,900 students would not meet this demand. The SEIR identified that planned project schools might not meet anticipated demands during Phase 1a and Phase 1 of project development. This was considered a significant impact and was reduced to a less-than-significant level through payment of required developer fees and coordination and planning with the appropriate school district(s). The same mitigation approach would reduce impacts associated with demand for schools under the Tract 3694 VTM proposal to less-than-significant levels.

The development scenario analyzed in the SEIR includes construction of docks and back bays along the San Joaquin River and Old River during Phase 1 of project development, as well as docks along the Phase 1 portion of the Central Lake. The SEIR determined that these facilities would increase demand for water-related emergency services provided by the Lathrop-Manteca Fire Protection District (LMFPD), resulting in a significant impact. The Tract 3491 VTM and Tract 3694 VTM proposals do not include docks and/or back bays along the San Joaquin River and Old River and include fewer docks along the Central Lake than assumed during Phase 1 in the SEIR. Therefore, the Tract 3491 VTM and Tract 3694 VTM would result in a lesser demand for water-related emergency services than the Phase 1 development scenario identified in the SEIR. However, there would still be an increased demand relative to existing conditions under the Tract 3491 VTM and Tract 3694 VTM proposals because some docks would be located along the Central Lake. Therefore, impacts related to increased demand for water-related emergency services would occur and the impact would still be identified as significant. The same mitigation measure identified in the SEIR that reduces this impact to a less-than-significant level for the development scenario evaluated in the SEIR would reduce the impact to a less-than-significant level under the Tract 3491 VTM and Tract 3694 VTM proposals.

The Tract 3694 VTM proposal would basically implement the same type, extent, and pace of development as described in the SEIR and previous addendum. Therefore, the need for fire flow would generally be the same for the three scenarios and the Tract 3694 VTM proposal would not result in new or substantially more severe impacts related to this issue. The impact related to increased demand for fire flow would be significant under all three development scenarios, and the same mitigation measure identified in the SEIR that reduces the impact to a less-than-significant level for the development scenario evaluated in the SEIR and the previous addendum would also reduce the impact to a less-than-significant level under the Tract 3694 VTM proposal.

The increased demand for animal control facilities and services associated with project development is mitigated in the SEIR through a requirement that the project applicant and the City negotiate an animal control services agreement. The agreement would be designed to ensure that resources are available for animal services facilities and staff to expand to meet demand associated with the River Islands project. Upon certification of the previous addendum to the SEIR, the project applicant and the City coordinated on the drafting of an animal services agreement, although an agreement has not yet been finalized. Finalization of this agreement will likely remain a condition of approval for the Tract 3694 VTM. Conditions of the agreement would mirror the requirements in the Tract 3491 VTM to include a 10-acre Animal Campus site at one of two possible locations, or as discussed in the previous addendum, if development beyond the Tract 3694 VTM area occurs, an expanded Animal Campus (net 20-acres) may be developed at one of two locations, or the Animal Campus site identified in the SEIR may ultimately be used and the site in the Tract 3694 VTM area would be made available for development consistent with the development scenario described in the SEIR.

Completion of an animal control services agreement, which is presumed to include the approach to the Animal Campus development described above, would still be required as a mitigation measure under the Tract 3694 VTM proposal. Therefore, consistent with conclusions in the previous addendum, the Tract 3694 VTM proposal has a more defined mitigation approach to address increased demand for animal control facilities and services, and the basic mitigation requirement included in the SEIR consisting of completion of an animal control services agreement would be equally effective under the Tract 3694 VTM and SEIR development scenarios, resulting in significant adverse impacts related to increased demand for animal control facilities and services being reduced to a less-than-significant level.

Generation of solid waste resulting from project development is calculated in the SEIR using estimated project population, estimated numbers of employees, and types of businesses generating those employees. The Tract 3694 VTM proposal includes an increase in project population of 361 individuals relative to the past project approvals for Phase 1 associated with the SEIR and the Tract 3491 VTM proposal. These individuals would generate approximately 130 tons per year of solid waste. This conclusion is based on solid waste generation rates identified in the SEIR. However, the SEIR and previous addendum evaluated solid waste generation at full buildout. The SEIR describes that the Foothill Sanitary Landfill, which would receive solid waste from the project, has ample long-term available capacity. Therefore, the SEIR and previous addendum conclude that project-generated solid waste would result in a less-than-significant impact. The SEIR development scenario, the Tract 3491 VTM proposal, and the Tract 3694 VTM proposal all have the same number and type of housing units and type and amount of employee-generating land uses (i.e., Town Center, Employment Center) at full buildout. Therefore, between these three scenarios, and the Tract 3694 VTM proposal would not result in new or substantially more

severe impacts related to solid waste generation. Impacts related to generation of solid waste, which are considered less than significant in the SEIR and previous addendum, would also be less than significant under the Tract 3694 VTM proposal.

In summary, implementation of the Tract 3694 VTM proposal would not result in any new significant impacts related to public services, significant changes in the severity of previously identified impacts related to public services, or significant changes in the effectiveness or applicability of mitigation measures and project alternatives related to public services.

3.11 PUBLIC UTILITIES

Since certification of the River Islands SEIR and related project approvals in 2003, and adoption of the Tract 3491 VTM in 2005, no changes to the regulatory background relative to public utilities have occurred that would trigger the need for subsequent environmental review of the Tract 3694 VTM proposal.

In regard to existing conditions, since certification of the SEIR and related project approvals, the South San Joaquin Irrigation District (SSJID) South County Surface Water Supply Project (SCSWSP) has been completed. The SEIR identified a significant impact related to water supply, not because the City did not have rights to sufficient water to serve the project and existing and future development in the City, but because the SCSWSP had not been completed at that time and water deliveries from this source were not available. Because the SCSWSP has been completed and the City is receiving water deliveries from SSJID, the significant water supply impact identified in the SEIR is no longer applicable, or would be considered less than significant if the SEIR were prepared today.

The SEIR and previous addendum identify public utilities impacts related to:

- demand for potable water (significant),
- environmental impacts associated with the development of new city wells (less than significant) (with mitigation identified in the master plan EIR),
- ► demand for wastewater treatment capacity (significant),
- environmental impacts associated with the expansion of Water Recycling Plan (WRP) #1 and construction of WRPs #2 and #3 (significant),
- demand for recycled water storage and disposal capacity during Phases 1a and 1 of project development (less than significant),

- ► demand for recycled water storage and disposal capacity for Phase 2 of project development (significant), and
- ► stormwater/surface runoff management (less than significant).

Of the four significant impacts that are identified above, all but one of them (the environmental impact associated with the expansion of WRP #1 and construction of WRPs #2 and #3) could be reduced to less-than-significant levels with mitigation.

The Tract 3694 VTM proposal includes the same or similar types and amounts of land uses that would generate demand for potable water as described in the existing project approvals for Phase 1 of project development. However, as described previously in Section 3.3, "Population, Employment, and Housing," the higher ratio of single-family housing units included in the Tract 3694 VTM proposal would result in a Phase 1 project population 361 persons greater than identified in past project approvals. The Water Supply Assessment (WSA) prepared for the River Islands project (Appendix J in the SEIR) found that in the 5 year increments from 2005 through 2025 when water supply was analyzed, the City would have ample water supply to serve the River Islands project and existing and other planned future development in the City. In the years 2010, 2015, and 2020, which is approximately the time frame that Phase 1 of the project would be in development, the City would have excess water supply in the range of hundreds to thousands of acre feet in normal water supply years, and would have excess water supply in the range of thousands of acre-feet to approximately 80 additional acre-feet during multiple consecutive dry years. The water demand factors in the WSA translate to a residential water demand of approximately 0.11 acre-feet per person per year. Therefore, the 361 additional individuals associated with the Tract 3694 VTM proposal would result in an increased Phase 1 water demand of approximately 40 acre-feet per year, which is less than the 80 additional acre-feet of water available to the City during worst-case conditions (i.e., multidry-year drought in 2020). Therefore, the City would have sufficient water supply to serve the extra residents associated with the Tract 3694 VTM proposal and the Tract 3694 VTM proposal would not result in new or substantially more severe impacts related to water demand during Phase 1 of project development.

At full buildout, the SEIR development scenario, the Tract 3491 VTM proposal, and the Tract 3694 VTM proposal all have the same amount and type of land uses. Therefore, project demand for potable water at full buildout would not differ between these three scenarios, and the Tract 3694 VTM proposal would not result in new or substantially more severe impacts related to water demand. As stated above, impacts related to demand for potable water, which are considered significant in the SEIR because the SCSWSP had not been completed at the time, would now be considered less than significant because the SCSWSP is complete. Therefore, impacts related to demand for potable water at full buildout under all three project scenarios are considered less than significant.

As identified in the Water Master Plan EIR, and summarized in the River Islands SEIR, the construction and operation of new City wells (Wells #21–23 and Emergency Wells #1 and #2) proposed in the Water Master Plan could contribute to significant geotechnical, groundwater, flooding, noise, farmland, aesthetics/views, terrestrial biology, and cultural resources impacts. Development of these new City wells is associated with the citywide development addressed by the Water Master Plan, including development of the River Islands project. Because water demand associated with the SEIR, the Tract 3491 VTM proposal, and the Tract 3694 VTM proposal would all contribute to the need for development of these planned City wells, all three scenarios would contribute to the significant impacts identified in the Water Master Plan EIR. With mitigation identified in the Master Plan EIR, impacts from well construction and use would be reduced to less-than-significant levels under any of the RID scenario.

Similar to conditions described above regarding demand for potable water, although land uses under the Tract 3694 VTM proposal are the same or similar to those described in the SEIR and previous addendum, the Tract 3694 VTM proposal would result in 361 additional residents during Phase 1 of project development. Based on wastewater generation factors included in Appendix K of the SEIR, these individuals would be expected to generate approximately 32,500 gallons per day (0.0325 million gallons per day [mgd]) of wastewater. In the SEIR, demand for wastewater treatment during Phase 1 was considered a significant impact because planned expansion of WRP #1 was not yet complete. After the planned expansion, WRP #1 would provide up to 3.6 mgd of treatment capacity to serve various planned and existing projects in the City. The 3.6 mgd capacity at the expanded WRP #1 would be more than sufficient to serve Phase 1 of the River Islands project (1.59 mgd demand) and other planned and existing development in the City. The expanded WRP #1 would also have sufficient remaining capacity to serve the extra 0.0325 mgd of wastewater generation resulting from additional residents under the Tract 3694 VTM proposal. Although demand for wastewater treatment capacity is considered a significant impact in the SEIR and previous addendum, and would also be significant level in the SEIR and previous addendum, and would also be significant level in the SEIR and previous addendum, would reduce the impact to a less-than-significant level under the Tract 3694 VTM proposal.

As identified in the Water Master Plan EIR, and summarized in the River Islands SEIR, the expansion of WRP #1 and construction of WRPs #2 and #3 proposed in the Water Master Plan could contribute to significant geotechnical, groundwater, flooding, air, odor, noise, land use, aesthetics/views, terrestrial biology, water quality, fisheries, cultural resources, and emergency response impacts. Construction and expansion of these water recycling plants is associated with the citywide development addressed by the Water Master Plan, including development of the River Islands project. Because demand for wastewater treatment associated with the SEIR development scenario, the Tract 3491 VTM proposal, and the Tract 3694 VTM proposals would contribute to the need for development and expansion of City water recycling plants, all three scenarios would contribute to the

significant impacts identified in the Water Master Plan EIR. With mitigation identified in the Master Plan EIR, almost all impacts from expansion and construction of the water recycling plants would be reduced to less-thansignificant levels. However, no mitigation is available to reduce odor impacts and cumulative surface water quality and fisheries impacts, and these impacts would be significant and unavoidable under both scenarios. Although this impact would remain significant and unavoidable under the Tract 3694 VTM proposal, the project would not result in a substantially greater impact.

As stated previously, the Tract 3694 VTM proposal would result in approximately 0.0325 mgd of additional wastewater generation during Phase 1 of the River Islands project compared to the SEIR development scenario and the Tract 3491 VTM proposal. It can be reasonably assumed that this additional wastewater generation would result in an approximately equal amount of recycled water being produced at the City's water recycling plant(s). Demand for recycled water storage and disposal under Phase 1 of project development is considered a less-than-significant impact in the SEIR and previous addendum because there is sufficient land in the River Islands Phase 2 RID Area to accommodate the recycled water storage and disposal demand generated by Phase 1 development. The SEIR estimates Phase 1 development, which would generate approximately 1.59 mgd of recycled water, would require approximately 40 acres of recycled water storage ponds and 444 acres of crop irrigation area in the approximately 2,155-acre Phase 2 RID Area. There is more than sufficient acreage available in the Phase 2 RID Area to expand recycled water storage and disposal facilities as needed to address the additional 0.0325 mgd of recycled water storage and disposal facilities as needed to address the additional 0.0325 mgd of recycled water storage and disposal during Phase 1 of project development, which are considered less than significant in the SEIR and previous addendum, would also be considered less than significant under the Tract 3694 VTM proposal.

The SEIR identifies a significant impact related to demand for recycled water storage and disposal capacity for Phase 2 of development. Because the Tract 3694 VTM proposal does include or affect Phase 2 development, this impact would not apply to the Tract 3694 VTM proposal. This same conclusion was applied to the Tract 3491 VTM proposal in the previous addendum.

The 92 acres of stormwater detention water bodies and associated stormwater management BMPs and treatment wetlands included in the Tract 3694 VTM are considered sufficient to detain and treat the stormwater/surface runoff generated under this development proposal (Miller, pers. comm., 2007). Information supporting this conclusion is also provided in Section 3.8, "Hydrology and Water Quality." Therefore, the impact related to stormwater/surface runoff management, which is identified as less than significant in the SEIR and previous addendum, would also be less than significant under the Tract 3694 VTM proposal.

Similar to conditions described above regarding demand for potable water and other utility services, demand for electricity and natural gas would be somewhat greater under the Tract 3694 VTM proposal than for the development proposal described in the SEIR and the Tract 3491 VTM proposal because of the additional Phase 1 population included in the Tract 3694 VTM. As described in the SEIR, Pacific Gas & Electric Company (PG&E) has sufficient natural gas and electrical supply and appropriate delivery infrastructure to serve the entire River Islands project. The Lathrop Irrigation District (LID) also has the capability to deliver electricity to the River Islands project. As part of the River Islands project, electrical and natural gas lines would be installed between the project site and nearby PG&E facilities to deliver service to the project site, either through PG&E directly or through LID. A connection to the existing Manteca-Kasson 115 kilovolt (kV) electrical line would serve the entire River Islands project. This connection would be made when Phase 1 development exceeds the capacity of the existing electrical system on Stewart Tract, which is estimated to occur after approximately 600 housing units have been occupied. Extra residents associated with the Tract 3694 VTM could conceivably result in the connection to the Manteca-Kasson 115-kV being required slightly earlier than originally anticipated; however, sufficient electrical supply would still be provided to the project site (either by PG&E or LID) during all project phases and no additional delivery infrastructure would be required. Natural gas delivery to the project site would occur via two pipelines connected to PG&E's exiting Louise Avenue feeder line. The first natural gas line would serve Phase 1 of project development. The second line would be installed when demand for natural gas approaches the capacity of the first line. Natural gas delivered by the two lines is sufficient to serve the entire River Islands project. Similar to the situation for electricity demand, extra residents associated with the Tract 3694 VTM could conceivably result in the second natural gas line being required slightly earlier than originally anticipated; however, sufficient natural gas supply would still be provided to the project site during all project phases and no additional delivery infrastructure would be required. Demand for electricity and natural gas is considered a less-than-significant impact in the SEIR and previous addendum, and this impact would also be less than significant under the Tract 3694 VTM proposal.

In summary, implementation of the Tract 3694 VTM proposal would not result in new significant impacts related to public utilities, significant changes in the severity of previously identified impacts related to public utilities, or significant changes in the effectiveness or applicability of mitigation measures and project alternatives related to public utilities.

3.12 RECREATION

Since certification of the River Islands SEIR and related project approvals in 2003, and adoption of the Tract 3491 VTM in 2005, no changes to the regulatory background or existing conditions relative to recreation resources have occurred that would trigger the need for subsequent environmental review of the Tract 3694 VTM proposal.

The SEIR and previous addendum identify recreation impacts related to demand for neighborhood and community parks, reduced recreational boating opportunities, and consistency with the open space designations. The impact related to reduced recreational boating opportunities is less than significant; the remaining two impacts are beneficial.

Demand for parkland is calculated in the SEIR and previous addendum based on estimated project population, which is calculated based on the number and type of housing units included in the project. Using the population generation assumptions provided in the SEIR, the Tract 3694 VTM proposal would have a population of 13,329 residents (see Section 3.3, "Population, Employment, and Housing" above). This is 361 more individuals than included in Tract 3491 VTM and prior project approvals because of the higher percentage of single-family housing units. The City's general plan standards call for 2 acres of neighborhood park and 3 acres of community park per 1,000 residents. Therefore, to meet the general plan standards, the Tract 3694 VTM proposal would need to include a minimum of 27 acres of neighborhood park and 40 acres of community park.

As described previously in Chapter 2, "Description of the Proposed Action," the Tract 3694 VTM proposal includes approximately 83.5 total acres of parkland (including the 8 acres available at the Town Center school site). Of this approximately 83.5 acres, roughly 27.5 acres would serve neighborhood park functions consistent with the general plan standards, and roughly 56 acres would be considered community park per the general plan standards. Therefore, the Tract 3694 VTM proposal provides neighborhood and community parks in excess of projected demand (i.e., 27 acres of neighborhood park and 40 acres of community park). This is the same conclusion provided in the SEIR for Phase 1 of project development and in the previous addendum for the Tract 3491 VTM proposal. Therefore, under the Tract 3694 VTM proposal, the Tract 3491 VTM proposal, and the development scenario analyzed in the SEIR, the provision of parkland in excess of demand would be expected to alleviate the demand on existing neighborhood and community parks in the city, resulting in a beneficial impact. The Tract 3694 VTM proposal would not result in new or substantially more severe impacts related to demand for neighborhood and community parks.

Development under the Tract 3694 VTM proposal (like the Tract 3491 VTM proposal) would not include docks along the external water system. All docks proposed as part of Phase 1 as evaluated in the SEIR would not be constructed until Phase 2 of project development under the Tract 3694 VTM proposal. Therefore, impacts associated with limitations to recreational boating opportunities (e.g., water skiing) resulting from the presence of project docks that would occur during Phase 1 in the SEIR scenario would not occur under the Tract 3694 VTM proposal. However, at full buildout of Phases 2 under the Tract 3694 VTM scenario, the same facilities along the external water system described in the SEIR would be present. Therefore, at full buildout, the less-than-significant

impact related to limitations to recreational boating opportunities identified in the SEIR would be the same under the Tract 3694 proposal.

As described previously, the Tract 3694 VTM proposal includes approximately 83.5 acres of parkland. It also includes a pedestrian and bicycle trail system similar to that described in the SEIR and previous addendum connecting the various parks and other project features. Development of the Tract 3694 VTM proposal would meet the City's requirements for parks and open space. Therefore, the Tract 3694 VTM proposal, like the Phase 1 development scenario in the SEIR and the Tract 3491 VTM scenario evaluated in the previous addendum, would result in a beneficial impact related to consistency with the City's general plan open space designation. The provision of parkland for buildout of the River Islands Project remains the same as that evaluated in the SEIR.

Implementation of the Tract 3694 VTM proposal would not result in any new significant impacts related to recreational resources, significant changes in the severity of previously identified impacts related to recreational resources, or significant changes in the effectiveness or applicability of mitigation measures and project alternatives related to recreational resources.

3.13 AGRICULTURAL RESOURCES

Since certification of the River Islands SEIR and related project approvals in 2003, and adoption of the Tract 3491 VTM in 2005, no changes to the regulatory background relative to agricultural resources have occurred that would trigger the need for subsequent environmental review of the Tract 3694 VTM proposal.

In regard to existing conditions, since certification of the SEIR and related project approvals, all Williamson Act contracts that apply to lands included in the SEIR Phase 1 development area and the Tract 3694 VTM development proposal area have been cancelled. Therefore, a majority of the impacts related to Williamson Act contract cancellations, which are considered significant in the SEIR, have already occurred (contracts in much of the Phase 2 area have not yet been cancelled). Implementation of the Tract 3694 VTM proposal would not alter the impact as described in the SEIR.

The SEIR and previous addendum identify additional agricultural resource impacts related to conversion of important farmland (significant) and adjacent landowner/user conflicts (potentially significant). No mitigation is available to reduce impacts related to the conversion of important farmland to a less-than-significant level; therefore, this impact is considered significant and unavoidable. Impacts related to adjacent landowner/user conflicts can be reduced to less than significant with mitigation identified in the SEIR.

As described in the SEIR, development of approximately 1,770 acres under Phase 1 would result in the conversion of approximately 1,555 acres of important farmland to nonagricultural uses. As discussed in the

previous addendum, the Tract 3491 VTM proposal covers approximately 1,500 acres, and therefore would result in fewer acres of important farmland being converted to nonagricultural uses than identified in the SEIR. However, because there is no feasible mitigation to fully compensate for the loss of important farmland (i.e., no new important farmland can be created to replace what is lost), this impact remains significant and unavoidable under the Tract 3491 VTM proposal. The Tract 3694 VTM proposal could result in the conversion of up to 1,359 acres of important farmland to nonagricultural uses. This is less than the area of important farmland conversion identified in the SEIR. However, for the same reasons described for the Tract 3491 VTM, this impact would remain significant and unavoidable.

The Tract 3694 VTM proposal would generate a substantial linear distance of urban/agriculture interface at the border between the Tract 3694 VTM area and ongoing agricultural operations in the Phase 2 portion of the River Islands project site. However, the Tract 3694 VTM proposal, like the Tract 3491 VTM proposal, includes a levee system surrounding the entire development area that would provide an additional buffer between development and agricultural uses not included in Phase 1 of the SEIR. As described for the Tract 3491 VTM proposal in the previous addendum, potential conflicts between urban users of the developed areas and adjacent agricultural landowners would be expected to be slightly less under the Tract 3491 VTM proposal than anticipated in the SEIR because of the presence of the levee buffer. The same conclusion would apply to the Tract 3694 VTM proposal because the same levee buffer would be present. However, impacts associated with these conflicts would still be considered potentially significant under the Tract 3491 VTM and Tract 3694 VTM proposals to a less-than-significant level.

Implementation of the Tract 3694 VTM proposal would not result in any new significant impacts related to agricultural resources, significant changes in the severity of previously identified impacts related to agricultural resources, or significant changes in the effectiveness or applicability of mitigation measures and project alternatives related to agricultural resources.

3.14 TERRESTRIAL BIOLOGY

Since certification of the River Islands SEIR and related project approvals in 2003, and adoption of the Tract 3491 VTM in 2005, no changes to the regulatory background or existing conditions relative to terrestrial biology have occurred that would trigger the need for subsequent environmental review of the Tract 3694 VTM proposal.

The SEIR and previous addendum identify terrestrial biology impacts related to the following categories of effects:

► general biological resources (less than significant);

- special-status plants (potentially significant);
- Valley elderberry longhorn beetle (significant);
- giant garter snake (significant);
- western pond turtle (potentially significant);
- Swainson's hawk (significant);
- ► Aleutian Canada goose and greater sandhill crane (less than significant);
- burrowing owl (significant);
- colonial nesting birds (less than significant);
- ground-nesting or streamside/lakeside-nesting birds (potentially significant);
- ► birds nesting in isolated trees or shrubs outside of riparian habitat (potentially significant);
- birds nesting along riparian corridors (significant);
- ► snowy egret, American white pelican, double-crested cormorant, and white-faced ibis (less than significant);
- ► ferruginous hawk, mountain plover, merlin, and long-billed curlew (less than significant);
- common tree-nesting raptors (significant);
- ► special-status bats (less than significant);
- riparian brush rabbit (significant);
- jurisdictional waters of the United States and riparian habitat (significant);
- wildlife corridors (significant); and
- ► biological resources associated with off-site facilities (potentially significant).

All 14 impacts identified as significant or potentially significant would be reduced to less than significant with mitigation identified in the SEIR.

The Tract 3694 VTM proposal does not include any disturbance to the external water system (Old River, San Joaquin River, and Paradise Cut); modifications or improvements to Paradise Cut in support of the flood control program; or fill of wetlands or waters of the United States under the jurisdiction of the U.S. Army Corps of Engineers, including the central drainage ditch passing through the RID area. Therefore, impacts related to biological resources that occur only in these areas would not apply to the Tract 3694 VTM proposal. Biological resources and associated impacts within this category include special-status plants, valley elderberry longhorn beetle, giant garter snake, western pond turtle, snowy egret, American white pelican, double-crested cormorant, jurisdictional waters of the United States and riparian habitat, and wildlife corridors.

A great majority of the land affected by development under the Tract 3694 VTM proposal, Phase 1 development described in the SEIR, and the Tract 3491 VTM has been disturbed as part of work that has already been completed constructing levees, high-ground corridors, and the Central Lake. This land was previously under

agricultural production and much of it could conceivably be returned to agricultural production if development were not to occur. Agricultural lands can provide a variety of habitat values for various species, with the primary habitat value being foraging area. Impacts to biological resources that use agricultural lands that are considered less than significant in the SEIR would also be less than significant under the Tract 3694 VTM proposal. Biological resources and associated impacts within this category include Aleutian Canada goose and sandhill crane, colonial nesting birds, white-faced ibis, and ferruginous hawk, mountain plover, merlin, and long-billed curlew. Impacts related to common biological resources, which include agricultural, ruderal, and developed areas, would also fall within this category.

Regardless of whether a species uses agricultural lands, another habitat type, or a combination of several habitat types, for several species where impacts are identified as significant or potentially significant in the SEIR and previous addendum, the mitigation measure to reduce these impacts to a less-than-significant level is participation in the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP). The mitigation approach provided by SJMSCP includes both implementation of incidental take avoidance and minimization measures and compensation for incidental take and loss of habitat through payment of fees (or in-lieu land dedication) for conversion of open space lands. Participation in the SJMSCP, which would occur under the SEIR development scenario, the Tract 3491 VTM proposal, or the Tract 3694 VTM proposal, would reduce the impacts to less-than-significant levels. Biological resources and associated impacts within this category include 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.

The SEIR and previous addendum identify that common tree-nesting raptors could nest in both the RID area and Paradise Cut. The loss of an active raptor nest, which could occur during tree removal in either of these areas, is considered a significant impact. Removal of an active raptor nest could occur during development in the Employment Center and other areas where potential raptor nest trees occur, as evaluated in the SEIR. The same mitigation measure identified in the SEIR and previous addendum to reduce this impact to a less-than-significant level would also reduce the impact to a less-than-significant level under the Tract 3694 VTM proposal.

The SEIR and previous addendum identify a potential impact to special-status bats through the loss of foraging habitat and roost sites. However, bat foraging habitat is locally and regionally abundant and the entire RID area (which includes the Tract 3694 VTM area) is not expected to contain important roost sites that would be affected; therefore, this impact is considered less than significant in the SEIR and previous addendum. Because the Tract 3694 VTM proposal overlaps with development areas identified in the SEIR, the conclusion in the SEIR that the project site is not expected to contain important roost sites would also apply to the Tract 3694 VTM area.

Therefore, impacts to special-status bats, which are considered less than significant in the SEIR and previous addendum, would also be considered less than significant under the Tract 3694 VTM proposal.

The SEIR identifies significant impacts to riparian brush rabbit during Phase 1 of project development associated with loss and/or disturbance of potential and occupied habitat in Paradise Cut and along the UPRR right-of-way. This impact is reduced to a less-than-significant level after mitigation. Under the Tract 3694 VTM proposal (as well as the Tract 3491 VTM proposal) the potential for impacts to riparian brush rabbit would be less than described in the SEIR because no project activities would occur in Paradise Cut; therefore, potential impacts to riparian brush rabbit would be limited to the UPRR right-of-way area. In this area, the potential for disturbance/impacts to riparian brush rabbit would continue to be less under the Tract 3694 VTM proposal than described in the SEIR because only a portion of the cross levee would be constructed between the Employment Center and the UPRR right-of-way, reducing the overall potential for construction disturbance (see Exhibits 1-3 and 2-1). This reduced level of impact is considered less than significant under the Tract 3491 VTM proposal and the Tract 3694 VTM proposal with implementation of various elements incorporated into the project design, including the cross levee being set back from the UPRR berm to minimize disturbance to brush rabbits during construction, installation of a fence/wall along the cross levee to prevent people and feral cats from crossing from the developed area into the UPRR right-of-way, and restrictions on vegetation management in the cross levee area protected by the fence/wall to allow vegetation to naturally increase in density to improve conditions for riparian brush rabbit. Construction of the cross levee segment in question was completed in 2006. Installation of the fence/wall along the cross levee and vegetation management measures would be implemented as part of whatever development proposal is implemented (i.e., Tract 3491 VTM or Tract 3694 VTM).

The SEIR and previous addendum also identify a potentially significant impact to biological resources associated with development of off-site facilities (e.g., electrical transmission lines, pipelines, traffic infrastructure outside the RID Area). This impact is reduced to a less-than-significant level after mitigation. Under the Tract 3694 VTM proposal, impacts resulting from development of off-site facilities would not differ substantially from those described in the SEIR and previous addendum because the same off-site utility and traffic infrastructure would be completed to support project development. The same mitigation measure identified in the SEIR and previous addendum to reduce this impact to a less-than-significant level would also reduce the impact to a less-than-significant level wou

In summary, implementation of the tract 3694 VTM proposal would not result in any new significant impacts related to terrestrial biology, significant changes in the severity of previously identified impacts related to terrestrial biology, or significant changes in the effectiveness or applicability of mitigation measures and project alternatives related to terrestrial biology.

3.15 FISHERIES

Since certification of the River Islands SEIR and related project approvals in 2003, and adoption of the Tract 3491 VTM in 2005, no changes to the existing conditions relative to fisheries have occurred that would trigger the need for subsequent environmental review of the Tract 3694 VTM proposal.

In regard to the regulatory background, since certification of the SEIR and related project approvals, the National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NMFS) proposed listing populations of North American green sturgeon south of the Eel River as threatened under the federal Endangered Species Act (ESA). The listing proposal was released on April 5, 2005 and was identified in the previous addendum addressing the Tract 3491 VTM. On April 7, 2006, after certification of the previous addendum, NOAA Fisheries made a decision on the listing proposal released the previous year and listed the green sturgeon as threatened under the ESA. The green sturgeon was identified as a state and federal Species of Concern when the SEIR was certified. As identified in the SEIR, the green sturgeon is expected to forage in, and migrate through, the lower San Joaquin River and south Delta, which would include waterways around the River Islands project site. However, the species has not been reported in, nor is it expected to spawn in, the River Islands area. Although the green sturgeon now receives a greater level of protection under the Endangered Species Act than when the SEIR or previous addendum was certified, the change in listing status does not alter any impact conclusions or mitigation measures in the SEIR or previous addendum. Green sturgeon would use waterways in the project area in the same manner as salmonid species (salmon and steelhead) known to inhabit the project vicinity: for migration, and to a smaller extent, for foraging. Therefore, impacts identified in the SEIR and previous addendum related to salmonid species protected under the ESA would apply to green sturgeon in the same manner currently described in these documents. Mitigation measures identified in the SEIR and previous addendum related to listed salmonid species would also apply to green sturgeon and would be equally effective in reducing significant impacts to less-than-significant levels. Therefore, where the SEIR identifies no significant unavoidable impacts related to listed salmonids (or other special status fish species), the same conclusion would apply to green sturgeon.

The SEIR and/or the previous addendum identify fisheries impacts related to:

- ► RID Area construction sediment (less than significant),
- ► levee breeching (significant),
- ► bridge and utility crossings (significant),
- ► the Paradise Cut Bridges (significant),
- dock construction (less than significant),
- ► structural habitat features (ranges from less than significant to beneficial),

- ► entrainment in project pumps (beneficial),
- ► water discharges to the Delta (beneficial),
- ► altered hydrology from water discharges (less than significant),
- ► maintenance dredging of back bays (significant),
- ► habitat modification in Paradise Cut (beneficial),
- diversion of chinook salmon smolts (less than significant),
- ► creation of new fish habitat in the RID Area (beneficial),
- ▶ introduction of exotic fish into the Delta (less than significant), and
- ► increased water consumption (less than significant).

All the significant impacts listed above would be reduced to less than significant with mitigation identified in the SEIR.

Under the SEIR development scenario and the Tract 3491 VTM and Tract 3694 VTM scenarios, bridges over Paradise Cut would be constructed during Phase 2 of project development. Because this Addendum focuses on impacts related to Phase 1 of project development, impacts related to bridges over Paradise Cut are not applicable to this analysis.

Under the Tract 3694 VTM proposal (as well as the Tract 3491 VTM proposal) all back bays, docks, Paradise Cut improvements, and similar activities along the external water system would take place during Phase 2 of project development. For this reason, many of the fisheries impacts identified in the SEIR would not occur under the Tract 3694 VTM proposal. These impacts include those related to levee breeching, dock construction, structural habitat features, maintenance dredging of back bays, habitat modification in Paradise Cut, and diversion of chinook salmon smolts.

In addition, fisheries impacts related to bridge and utility crossings identified in the SEIR would not occur under the Tract 3694 VTM proposal (or the Tract 3491 VTM proposal) because of the presence of the new bicycle/pedestrian bridge across the San Joaquin River and City plans to lead construction of the Bradshaw Crossing bridge. The presence of the bicycle/pedestrian bridge allows a new mechanism for utilities to cross the San Joaquin River, including a natural gas pipeline to serve the RID. Therefore, the planned directional bore of a natural gas pipeline under the San Joaquin River anticipated in the SEIR is not needed, and associated potential fisheries impacts would not occur under the Tract 3694 VTM proposal. Because the City of Lathrop is taking the lead on construction of the Bradshaw Crossing bridge in support of the City's planned regional transportation network, this project is now considered independent of the River Islands project and potential fisheries impacts associated with construction of this bridge would not be attributable to the Tract 3694 VTM proposal. However, it should be noted that environmental effects from construction of the Bradshaw Crossing bridge are fully evaluated in the current certified River Islands SEIR.

In regard to fisheries impacts from RID Area construction sediment, as described above in Section 3.8, "Hydrology and Water Quality," impacts related to construction sediment in the project-development area affecting water quality would occur under the development scenario identified in the SEIR and both the Tract 3491 VTM and Tract 3694 VTM proposals. In the SEIR and previous addendum, this impact is considered potentially significant and is reduced to a less-than-significant level with mitigation. This impact would still be considered potentially significant under the Tract 3694 VTM proposal, and the same mitigation measures would be implemented as part of the Tract 3694 VTM to reduce the impact to less-than-significant levels. The same less than significant conclusion would apply to potential impacts on fisheries from construction sediment affecting water quality.

Like Phase 1 development in the SEIR, the Tract 3694 VTM proposal involves construction of a portion of the Central Lake and other internal water features; however, these features under the Tract 3694 VTM proposal would occupy approximately 92 acres, whereas internal water features included as part of Phase 1 development under the SEIR scenario would cover approximately 200 acres (the Tract 3491 VTM includes approximately 79 acres of internal water features). Although a smaller amount of internal water features is included in the Tract 3694 VTM proposal compared to the SEIR development scenario, the 92 acres of water bodies and 10.8 additional acres of human-made wetlands proposed under this scenario are considered sufficient to detain and treat stormwater generated by the project. This conclusion is discussed in more detail in the previous evaluations of stormwater management in Section 3.8, "Hydrology and Water Quality" and Section 3.11, "Public Utilities."

As described under the SEIR and previous addendum, water would occasionally be pumped from the Old River and San Joaquin River into the internal water features (i.e., Central Lake, Grand Canal) to raise water levels when needed, and similarly, water would be pumped from the internal water features into Paradise Cut when water levels were too high. In the SEIR and previous addendum it was determined that the Central Lake management regime would either have beneficial or less-than-significant effects on fisheries because the volume of diversions from the Delta to the Central Lake and discharges from the Central Lake to the Delta would be less than under existing agricultural operations; the timing of diversions and discharges would be superior relative to fishery resources; diversions would be less likely to adversely affect fish because existing agricultural intakes would be replaced with new screened intakes; and the water quality of discharges to Paradise Cut from the Central Lake would be greater than existing agricultural discharges.

The size and configuration of internal water features under the Tract 3694 VTM proposal are similar to that analyzed in the Tract 3491 VTM addendum, although they are somewhat different from those described in the

SEIR. However, because the general lake management regime remains the same under all three scenarios, the same beneficial and less-than-significant impacts associated with lake-level management listed above would apply to the Tract 3694 VTM proposal. These include impacts related to the volume of diversions and discharges, the timing of diversions and discharges, and the quality of discharges. In addition, the beneficial impact of Central Lake construction creating new fish habitat in the RID Area identified in the SEIR and previous addendum would also apply to the Tract 3491 VTM proposal.

Similar to the Tract 3491 VTM proposal, under the Tract 3694 VTM, existing agricultural intakes and outfalls would be used to move water between the internal water features and the Delta. Installation of new intakes equipped with fish screens and new outfalls, as described in the SEIR, would be deferred until Phase 2 of project development. This would reduce the beneficial impact identified in the SEIR related to fish entrainment because existing unscreened intakes would not be immediately replaced by new intakes equipped with fish screens. However, because the volume and timing of diversions from the Delta under the Tract 3694 VTM proposal would still be improved compared to existing conditions, impacts associated with fish entrainment in project pumps would still be considered beneficial under this development proposal. This is the same conclusion provided for the Tract 3491 VTM proposal in the previous addendum.

The SEIR and previous addendum identify a fisheries impact resulting from the Central Lake potentially providing a mechanism for exotic fish species to be introduced into the Delta via discharges from the lake. This impact is considered less than significant in the SEIR and previous addendum because of a requirement that the Central Lake only be stocked with species currently present in the Delta and that the stocking program be conducted in consultation with the U.S. Fish and Wildlife Service, NMFS, and the California Department of Fish and Game. These same stocking guidelines would be implemented under the Tract 3694 VTM proposal; therefore, impacts related to the potential introduction of existing fish species to the Delta from the internal water features would remain less than significant.

A less-than-significant impact is also identified in the SEIR and previous addendum related to the potential for project generated water consumption to adversely affect fisheries resources. As described above in Section 3.11, "Public Utilities," the Tract 3694 VTM proposal includes the same or similar types and amounts of land uses that would generate demand for potable water as described in the existing project approvals for Phase 1 of project development under the SEIR and Tract 3491 VTM scenarios. Therefore, the Tract 3694 VTM proposal would not result in a substantial change in potable water demand for potable water, fisheries impacts related to water consumption that are identified as less than significant in the SEIR and previous addendum would also be less than significant under the Tract 3694 VTM proposal.

In summary, implementation of the Tract 3694 VTM proposal would not result in any new significant impacts related to fisheries, significant changes in the severity of previously identified impacts related to fisheries, or significant changes in the effectiveness or applicability of mitigation measures and project alternatives related to fisheries.

3.16 CULTURAL RESOURCES

Since certification of the River Islands SEIR and related project approvals in 2003, and adoption of the Tract 3491 VTM in 2005, no changes to the regulatory background relative to cultural resources have occurred that would trigger the need for subsequent environmental review of the Tract 3491 VTM proposal.

In regard to existing conditions, since certification of the SEIR and the previous addendum, further cultural resources surveys and testing have been conducted at an archeological site identified as site RI-1 in the SEIR. The SEIR impacts to this site (described as impacts to "recorded archeological sites") were identified as potentially significant, and mitigation to address this impact consisted of further archeological testing and additional actions as appropriate if the testing resulted in evidence that the site represents a "unique archeological resource" as defined by CEQA. The surveys and testing conducted since the SEIR and previous addendum were certified were completed in compliance with the mitigation requirements in the SEIR and previous addendum. During this testing, evidence of Native American occupation, human bone fragments, and other materials were found, resulting in the site qualifying as a "unique archeological resource" as defined by CEOA. Therefore, impacts to this site from project development are confirmed as significant, and further action/study is required consistent with the mitigation requirements of the SEIR and previous addendum. The Phase 1 development scenario described in the SEIR, the Tract 3491 VTM proposal, and the Tract 3694 VTM proposal all intersect site RI-1 and propose the same type of development in the area. Therefore, impacts to site RI-1 would be the same under all three scenarios and the same mitigation measure identified in the SEIR and previous addendum would apply. The mitigation measures included in the SEIR and previous addendum would reduce this impact to a less-thansignificant level.

The SEIR and previous addendum identify additional cultural resources impacts related to listed archeological sites (significant), historic properties (significant), undiscovered/unrecorded archeological sites (potentially significant), undiscovered/unrecorded human remains (significant), and off-site resources (significant). All these impacts would be reduced to less-than-significant levels with mitigation.

Cultural resources impacts related to undiscovered/unrecorded resources and off-site resources address the potential to encounter currently unknown resources in the RID Area or within off-site utility corridors because of these resources either being below the ground surface or not yet being encountered during surveys. Because the

Tract 3694 VTM proposal includes less disturbance area than Phase 1 development assumed in the SEIR (approximately 1,359 acres versus approximately 1,770 acres) and includes less off-site infrastructure (in part because the Bradshaw Crossing bridge is now a City-led project and has independent utility from the River Islands project), it can be assumed that the potential to encounter undiscovered/unrecorded resources would be less under the Tract 3694 VTM proposal. However, because the potential still exists to encounter currently unknown cultural resources during development of the Tract 3694 VTM proposal, significant impacts identified in the SEIR related to this issue would still be considered significant under the Tract 3694 VTM proposal. The mitigation measures identified in the SEIR for these impacts would also reduce the impacts to less-thansignificant levels under the Tract 3694 VTM proposal. The same less-than-significant conclusion applies to the Tract 3491 VTM proposal, as described in the previous addendum.

Impacts identified in the SEIR and previous addendum related to listed archeological sites and historic properties involve the degradation of visual character in the vicinity of historic/archeological resources resulting from project development. Historic/archeological resources considered in these impacts include the railroad drawbridge crossing the San Joaquin River just north of the Manthey Road bridge; the landing place for the sail launch *Comet* (a California historic landmark), which is on the San Joaquin River near the railroad drawbridge; and the agricultural silo complex just southwest of the railroad drawbridge. Construction of modern structures near these sites could degrade remaining views that reflect the historic context of the sites and is considered a significant impact.

Under the development scenario described in the SEIR, views of the railroad drawbridge and the *Comet* landing site would be adversely affected by the Golden Valley Parkway bridge over the San Joaquin River and houses on the high-ground corridor north of the bridge. This adverse impact would be reduced to a less-than-significant level with mitigation. The Golden Valley Parkway bridge is not included in the Tract 3694 VTM proposal. This facility would be constructed during Phase 2 of project development. Therefore, impacts related to the Golden Valley Parkway bridge would not occur under the Tract 3694 VTM. Development of homes on high-ground corridors under the Tract 3694 VTM proposal would be very similar to the high-ground corridor development described in the SEIR. The same mitigation measures described in the SEIR that would reduce impacts on the railroad drawbridge and *Comet* landing site to less-than-significant levels would have the same effect for the Tract 3694 VTM proposal. As identified in the previous addendum, neither the Golden Valley Parkway bridge or homes on high-ground corridors are included in the tract 3491 VTM proposal; therefore, views of the railroad bridge and the *Comet* landing site would not be adversely affected under this development scenario.

Under the development scenarios described in the SEIR and the previous addendum, views of the agricultural silo complex would be adversely affected by construction of modern buildings in the portion of the Employment

Center north and northwest of the silos. The Tract 3694 VTM proposal and the development scenarios addressed in the SEIR and previous addendum include the same Employment Center uses near the silo complex. Therefore, the tract 3694 VTM proposal would result in the same significant impact related to historic properties identified in the SEIR and previous addendum. However, implementation of the same mitigation measure identified in the SEIR and previous addendum would reduce this impact to less-than-significant levels under the Tract 3694 VTM scenario.

In summary, implementation of the Tract 3694 VTM proposal would not result in any new significant impacts related to cultural resources, significant changes in the severity of previously identified impacts related to cultural resources, or significant changes in the effectiveness or applicability of mitigation measures and project alternatives related to cultural resources.

3.17 AESTHETIC RESOURCES

Since certification of the River Islands SEIR and related project approvals in 2003, and adoption of the Tract 3491 VTM in 2005, no changes to the regulatory background or existing conditions relative to aesthetic resources have occurred that would trigger the need for subsequent environmental review of the Tract 3694 VTM proposal.

The SEIR and previous addendum identify aesthetic resources impacts related to views of the site from surrounding lands (less than significant), views from I-5 and the I-5/I-205/State Route 120 merge segment (less than significant), views for recreational boaters (less than significant), nighttime views (less than significant), views of the grain silos and the railroad bridge (less than significant), and design and function of walls and fences/consistency with the WLSP (potentially significant). The one potentially significant impact would be reduced to less than significant with mitigation identified in the SEIR.

The Tract 3694 VTM proposal does not include any alterations to existing levees along the San Joaquin River, Old River, or Paradise Cut other than those already evaluated in the SEIR. Relative to the SEIR, the Tract 3694 VTM proposal would result in less short-term alteration of the existing levees because no docks or back bays would be constructed during Phase 1. The SEIR included these facilities in Phase 1 and 2 of project development. Under the Tract 3694 VTM proposal these activities would all take place during Phase 2. Therefore, impacts related to alterations of views for recreational boaters, which are considered less than significant in the SEIR, would also be less than significant for the Tract 3694 VTM proposal. As discussed in the previous addendum, the Tract 3491 VTM proposal does not include any activities on the levees surrounding Steward Tract; therefore, aesthetic resource impacts related to views for recreational boaters would not apply under this development proposal.

Impacts related to views from surrounding lands and freeway segments result from project elements being visible from these vantage points. Under the development scenario described in the SEIR, such project elements include houses on high-ground corridors, bridges, the electrical transmission line connecting to the RID Area, the top portion of buildings in the Employment Center, potentially the tops of some buildings in the Town Center, and the cross levee. The Tract 3694 VTM proposal does not include any land uses different from those identified in the SEIR; therefore, the Tract 3694 VTM proposal would not create any new project features visible from surrounding vantage points. Therefore, impacts on views from surrounding lands and freeway segments, which are considered less than significant in the SEIR, would remain less than significant under the Tract 3694 VTM proposal. As discussed in the previous addendum, some project features identified as affecting views in the SEIR are not included in the Tract 3491 VTM proposal, such as houses on high-ground corridors. Therefore, impacts on views from surrounding lands and freeway segments under the Tract 3491 VTM proposal would be somewhat less than those described in the SEIR and would continue to be considered less than significant.

In regard to nighttime lighting, the Tract 3694 VTM proposal would basically implement the same type and extent of development as was analyzed in the SEIR and previous addendum, and hence the same type and extent of nighttime light sources, as described in the SEIR and previous addendum. The same lighting guidelines included in the River Islands Urban Design Concept (UDC) referenced in the SEIR and previous addendum would also apply to the Tract 3694 VTM proposal. Therefore, the Tract 3694 VTM proposal is expected to have the same less-than-significant effect on nighttime views as described in the SEIR and previous addendum.

As described above in Section 3.16, "Cultural Resources," because the Tract 3694 VTM proposal does not include the Golden Valley Parkway bridge over the San Joaquin River, views of the railroad drawbridge would not be altered by project implementation. However, construction of homes on high-ground corridors in the northeastern portion of the Tract 3694 VTM area would alter views of the railroad bridge. In addition, development of the Employment Center under the Tract 3694 VTM proposal would affect views of the agricultural silo complex in a similar manner to what is described in the SEIR and previous addendum. Although altering views of the railroad bridge and the silos is considered a significant impact from a cultural resources standpoint, from a purely visual perspective, impacts to the railroad bridge and silos are considered minor because the structures themselves would not be altered, views of the structures from the nearby highways and other vantage points would not be blocked, and the structures would still function as a local landmark as seen from the highways and other locations. Impacts related to views of the railroad bridge and grain silos, which are considered less than significant in the analysis of aesthetic resources in the SEIR and previous addendum, would also be considered less than significant under the Tract 3694 VTM proposal.

The SEIR and previous addendum include a significant impact related to River Islands UDC guidelines regarding walls and fences (particularly the concept of steel "see through" fences) potentially allowing light and glare from arterial roadways to enter residential neighborhoods. Because development under the Tract 3694 VTM proposal would be subject to the same UDC guidelines as the development proposal described in the SEIR and previous addendum, this impact would also apply to the Tract 3694 VTM proposal. The same mitigation measure identified in the SEIR would also reduce this impact to a less-than-significant level under the Tract 3694 VTM proposal.

In summary, implementation of the Tract 3694 VTM proposal would not result in any new significant impacts related to aesthetic resources, significant changes in the severity of previously identified impacts related to aesthetic resources, or significant changes in the effectiveness or applicability of mitigation measures and project alternatives related to aesthetic resources.

3.18 GROWTH-INDUCING IMPACTS

Since certification of the River Islands SEIR and related project approvals in 2003, and adoption of the Tract 3491 VTM in 2005, no changes to the regulatory background or existing conditions related to growth-inducing impacts have occurred that would trigger the need for subsequent environmental review of the Tract 3694 VTM proposal.

As described in various sections above, at full buildout of the River Islands project, land uses under the Tract 3694 VTM proposal are the same as those described in the SEIR and previous addendum. These include number and type of dwelling units, population and employee-generating land uses (i.e., dwelling units), and job-generating land uses (Town Center, Employment Center). Therefore, the Tract 3694 VTM proposal would not result in a substantial change in the overall growth-inducing impacts from those described in the SEIR related to fostering economic or population growth or the construction of additional housing and the provision of services. However, as described previously, the Tract 3694 VTM proposal is expected to have 361 more residents during Phase 1 of project development compared to the SEIR development scenario and the Tract 3491 VTM because of the higher percentage of single-family housing units. These additional residents during Phase 1 could result in a slight acceleration in growth-related impacts during the earlier portions of the approximately 20–25 year project buildout period. However, growth-inducing impacts would ultimately remain the same for the three development scenarios considered because each scenario includes the same facilities and land uses at full buildout. Therefore, the Tract 3694 VTM proposal would not result in a substantial change in growth-inducing impacts from those described in the SEIR and previous addendum related to fostering economic or population growth or the construction of additional housing.

Regarding public services, although methods for provision of some services under the Tract 3694 VTM proposal (as well as the Tract 3491 VTM proposal) are somewhat different from methods described in the SEIR, the ultimate level of service on the project site would be the same under all scenarios because each scenario must meet the same criteria for provision of service (e.g., fire department response time, numbers of police officers per 1,000 residents). Therefore, growth-inducing impacts associated with the provision of public services to the project site would be the same for the Tract 3694 VTM as described in the SEIR and the previous addendum.

Overall, implementation of the Tract 3694 VTM proposal would not result in any new significant growthinducing impacts, significant changes in the severity of previously identified growth-inducing impacts, or significant changes in the effectiveness or applicability of mitigation measures and project alternatives related to growth-inducing impacts.

3.19 CUMULATIVE IMPACTS

Since certification of the River Islands SEIR and related project approvals in 2003, and adoption of the Tract 3491 VTM in 2005, no changes to the regulatory background related to cumulative impacts have occurred that would trigger the need for subsequent environmental review of the Tract 3694 VTM proposal.

In regard to existing conditions, since 2003 several related projects listed in the cumulative impacts section of the SEIR have either been completed, or construction is underway (e.g., Panattoni Distribution, Utility Trailer, Hampton Inn, Crossroads Industrial Park, Mossdale Landing). However, because CEQA requires that a cumulative impact analysis consider past, present, and reasonably foreseeable future projects, the fact that some projects that were considered "future projects" in the SEIR are now complete or under construction does not affect their consideration in the cumulative-impact analysis.

In some instances more detail is now available regarding a related project than was available when the SEIR was certified in 2003 (e.g., Central Lathrop Specific Plan). However, the cumulative analysis in the SEIR included both a list approach (list of projects) and a plan approach (using development assumptions included in applicable general plans, specific plans, and the SJMSCP), resulting in a thorough and comprehensive consideration of local and regional development in the evaluation of cumulative impacts. Therefore, additional details or minor modifications regarding a specific project included in the cumulative impact analysis would not alter the overall conclusions in the analysis.

As indicated in the cumulative impacts analysis in the SEIR and repeated in the previous addendum addressing the Tract 3491 VTM, implementing the River Islands project would contribute to significant cumulative impacts related to traffic; air quality; noise; geology, soils, and mineral resources; public services; public utilities; agricultural resources; fisheries; and odor. It also would potentially contribute to significant surface water quality

impacts. As described in the SEIR and repeated in the previous addendum, these impacts are a product of cumulative growth, and no feasible mitigation is available to reduce these impacts to less-than-significant levels; therefore, these cumulative impacts are considered significant and unavoidable.

As described in various sections above, land uses under the Tract 3694 VTM proposal are the same or similar to those described in the SEIR and previous addendum. Therefore, project contributions to cumulative impacts under the Tract 3694 VTM proposal would not be substantially greater than those described in the SEIR and previous addendum. Implementation of the Tract 3694 VTM proposal would not result in any new significant cumulative impacts, significant changes in the severity of previously identified cumulative impacts, or significant changes in the effectiveness or applicability of mitigation measures and project alternatives related to cumulative impacts.

3.20 ALTERNATIVES

Since certification of the River Islands SEIR and related project approvals in 2003, and adoption of the Tract 3491 VTM in 2005, no changes to the regulatory background or existing conditions relative to project alternatives have occurred that would trigger the need for subsequent environmental review of the Tract 3694 VTM proposal.

The River Islands SEIR includes analysis of three alternatives, a No-Project (No-Development) Alternative, a No Project (WLSP) Alternative, and an Environmental Constraints (50% Development) Alternative. The alternatives analysis in the SEIR also describes several other alternatives that were considered, but then rejected from further consideration.

Impacts associated with the alternatives evaluated in the SEIR were compared against impacts resulting from full project buildout. Alternatives were also evaluated for their ability to meet project goals and objectives. Implementation of the Tract 3694 VTM proposal does not alter the evaluation of full buildout of the River Islands project because the SEIR fully evaluated the impacts of development of the entire River Islands project. Full project buildout under the Tract 3694 VTM proposal would be the same as the full buildout described in the SEIR. Therefore, the comparison of impacts associated with the proposed project and impacts associated with each project alternative included in the SEIR would not be altered under the Tract 3694 VTM proposal. The same circumstances and conclusions apply to the Tract 3491 VTM, as described in the previous addendum.

The Tract 3694 VTM proposal includes the same project goals and objectives as described in the SEIR and previous addendum. Therefore, the feasibility of alternatives relative to their ability to meet these goals and objectives would be the same under the Tract 3694 VTM, SEIR, and Tract 3491 VTM development scenarios. Implementation of the Tract 3694 VTM proposal would not result in alternatives previously found to be infeasible being categorized as feasible.

3.21 CONCLUSION

Based on the analysis of the categories of environmental impacts evaluated above, the Tract 3694 VTM proposal results in none of the conditions described in Section 15162 of the State CEQA Guidelines calling for preparation of a SEIR. In summary, the Tract 3694 VTM proposal and any altered circumstances or new information of substantial importance since certification of the River Islands SEIR and related project approvals in 2003, and adoption of the Tract 3491 VTM in 2005:

- ▶ will not result in any new significant environmental effects,
- ▶ will not substantially increase the severity of previously identified effects,
- ▶ will not result in mitigation measures or alternatives previously found to be infeasible becoming feasible, and
- will not 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 River Islands SEIR is the appropriate document to record and evaluate the minor project modifications associated with implementation of the Tract 3694 VTM proposal.

4 **REFERENCES**

- City of Lathrop. 2003 (January 10). *Office Absorption Analysis, River Islands at Lathrop*. Lathrop, CA. Prepared by EDAW, Sacramento, CA.
- City of Lathrop. 2005 (July 1). Addendum to the Subsequent Environmental Impact Report for the River Islands at Lathrop Project. Lathrop, CA. Prepared by EDAW, Sacramento, CA.
- Archer, Mike. Civil Engineer. MBK Engineers. June 24, 2005—Memorandum to Glenn Gebhardt of River Islands regarding the flood storage impact of phased development of River Islands at Lathrop; June 24, 2005—Memorandum from to Glenn Gebhardt of River Islands regarding the hydraulic analysis of River Islands at Lathrop phased development interior channel.
- Miller, Greg. Principal. Carlson, Barbee and Gibson, Inc. San Ramon, CA. May 26, 2005—Memorandum to Glenn Gebhardt of River Islands regarding 100-year flood storage and the River Islands Tract 3491 VTM proposal.
- Miller, Greg. Principal. Carlson, Barbee and Gibson, Inc. San Ramon, CA. February 13, 2007—Memorandum to Glenn Gebhardt of River Islands regarding stormwater management system capacity and the River Islands Tract 3694 VTM proposal.

APPENDIX A

TJKM Transportation Consultants — River Island Traffic Analysis



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February 12, 2007

Mr. Glen Gebhardt River Islands at Lathrop 73 W. Stewart Road Lathrop, CA 95330 **Via e-mail only**: ggebhardt@cambaygroup.com

Re: River Islands Traffic Analyses

Dear Glen:

TJKM Transportation Consultants has conducted a traffic engineering study for River Islands based on the Tentative Map prepared by Carlson, Barbee & Gibson Inc. The purpose of the study is to determine the geometric details of the roadway network in River Islands. To accurately predict future traffic volume, TJKM prepared a build out model (2025) of the entire River Islands community with the ultimate land use and street network in place. The network includes Golden Valley Parkway westerly to Paradise Road, Paradise Road in its entirety, the North River Island Parkway connection to the Louise/I-5 interchange, and all other River Islands streets. Land use data for parcels within River Islands were updated based on the development plan for the area. Finer traffic analysis zones were created throughout the project area with detailed land use information. This updated traffic forecasting model was used to determine the lane requirements for River Islands.

Based on the model, turning movement volumes were produced for 12 critical intersections for 2025 conditions. These volumes were used to determine the number of lanes required for the internal streets and also to determine the lane configuration at the study intersections. Figure 1 shows the recommended number of lanes for all internal streets in River Islands. Figure 2 shows the recommended lane configuration at the 12 study intersections. With the proposed lane configuration all study intersections are expected to operate at acceptable levels of service during both a.m. and p.m. peak periods.

Thank you for this opportunity to provide these services for River Islands. Let me know if you have any questions about this study.

Sincerely,

Joy Bhablacharg.

Joy Bhattacharya, P.E., PTOE Associate

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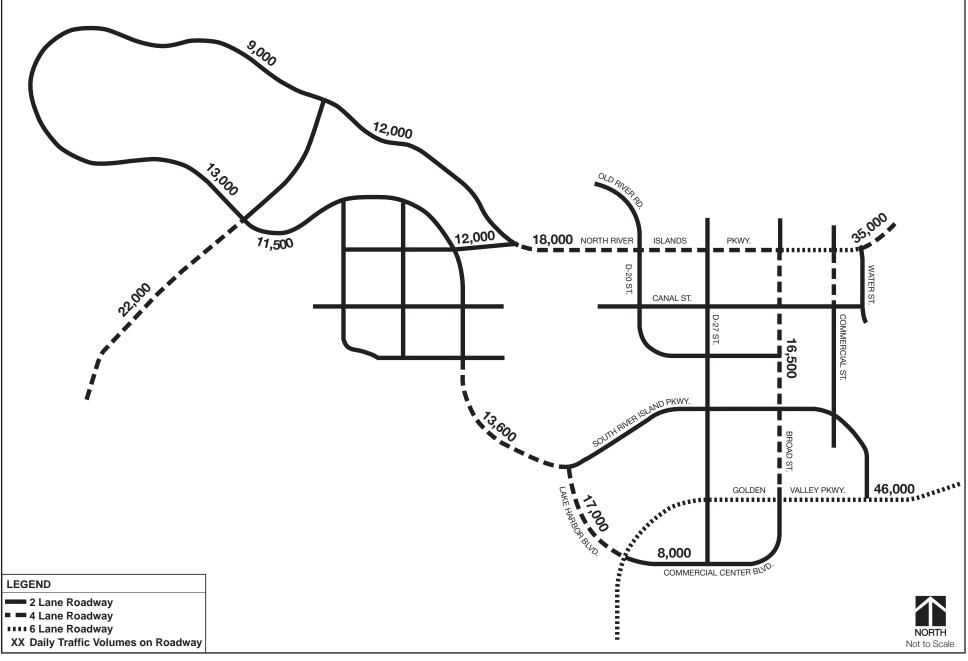
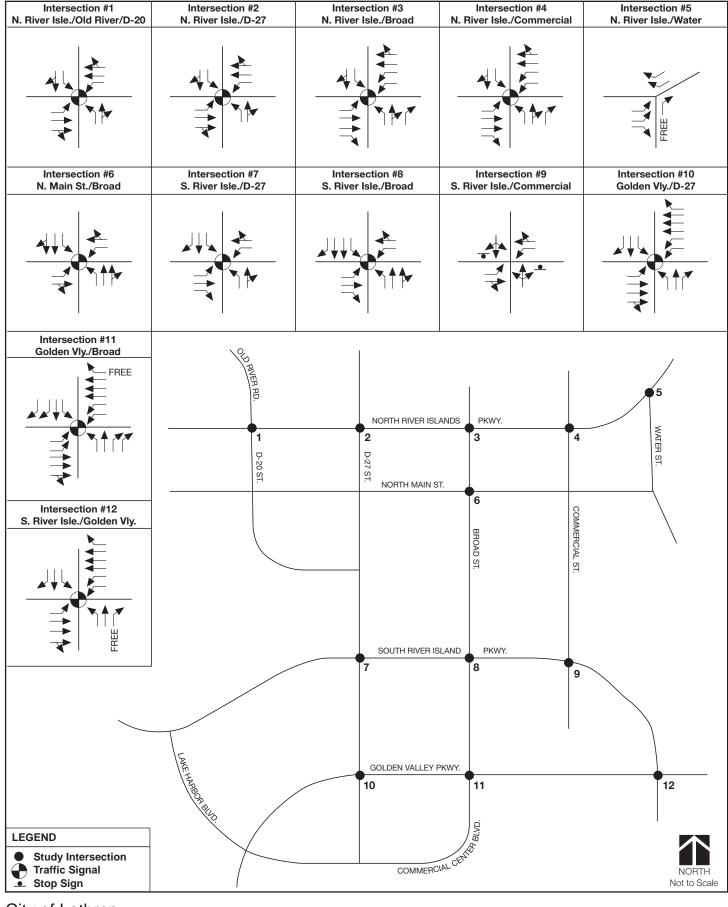


Figure **TJKM**

City of Lathrop River Islands Internal Street Network **Number of Lanes**

228-020 - 2/12/07 - JB



Figure

2

TJKM

City of Lathrop River Islands Internal Street Network **Recommended Lane Configuration**

228-004 - 9/13/06 - JB