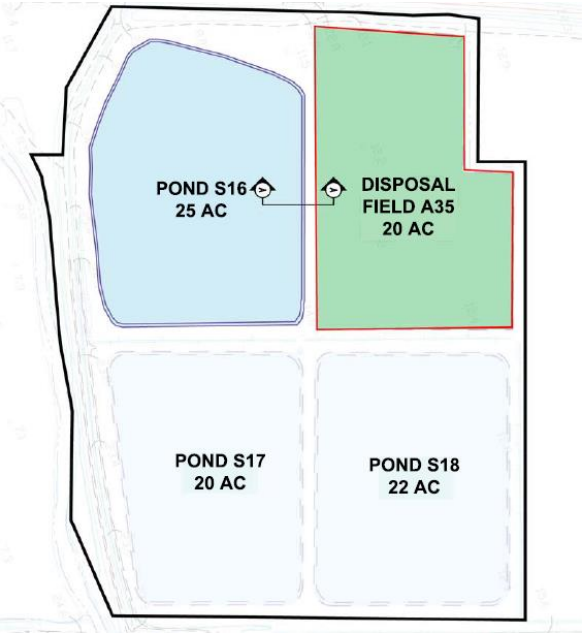
River Islands at Lathrop Project
Subsequent Environmental Impact Report
Addendum IV

State Clearinghouse No. 1993112027



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April 2014

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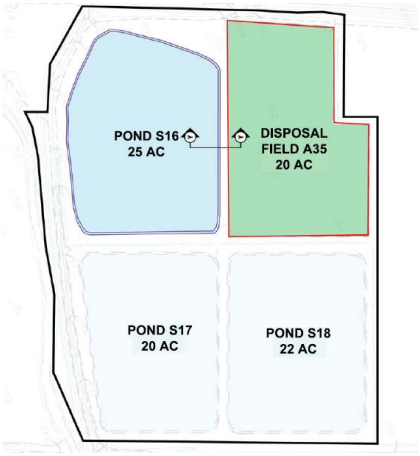

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Acronyms and Abbreviations

AB	Assembly Bill
ARB	California Air Resources Board
CEQA	California Environmental Quality Act
CFC	Chlorofluorocarbon
CH_4	methane
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
DTSC	California Department of Toxic Substance Control
EIR	environmental impact report
EPA	U.S. Environmental Protection Agency
GHG	greenhouse gas
HCFC	Hydro-chlorofluorocarbon
I-	interstate
MMT	million metric tons
mph	miles per hour
NAHC	Native American Heritage Commission
N_2O	nitrous oxide
NO_X	oxides of nitrogen
PFCs	Perfluorocarbons
PM_{10}	particulate matter less than 10 micrometers in diameter
RID area	River Islands Development area
RWQCB	Regional Water Quality Control Board
SCSWSP	South San Joaquin Irrigation District South County Surface Water Supply Project
SEIR	subsequent environmental impact report
SF_6	Sulfur hexafluoride
SJCOG	San Joaquin Council of Governments
SJEHD	San Joaquin County Environmental Health Department
SJMSP	San Joaquin Multi-Species Habitat Conservation and Open Space Plan
SWRCB	State Water Resources Control Board
UPRR	Union Pacific Railroad
VTM	vesting tentative map
WLSP	West Lathrop Specific Plan
WRP	water recycling plant

1 INTRODUCTION

1.1 BACKGROUND AND ACTION TRIGGERING THE ADDENDUM

This addendum to the Subsequent Environmental Impact Report (SEIR) for the River Islands at Lathrop Project evaluates development of offsite utility infrastructure that was not known at the time the River Islands SEIR was prepared. Specifically, this addendum analyzes locating recycled water storage and disposal sites on Stewart Tract, immediately south of the project area analyzed in the SEIR.

As the lead agency under the California Environmental Quality Act (CEQA), the City of Lathrop has determined that, in accordance with Section 15164 of the State CEQA Guidelines, the proposed recycled water storage and disposal facilities differs sufficiently from the development scenario described in the SEIR for the River Islands Project to warrant preparation of an addendum.

1.2 PREVIOUS ADDENDA AND OTHER ENVIRONMENTAL ANALYSIS

There have been three previous addenda prepared for the River Islands at Lathrop SEIR. In 2005, an addendum was prepared to address a revised vesting tentative map (VTM). The proposed VTM application would subdivide approximately 1,500 acres of the Stewart Tract to support development of Phase 1a and Phase 1 of the River Islands Project. Tract 3491 is the identifier given by San Joaquin County for this new VTM. In 2007, a second addendum was prepared to address additional modifications to the VTM (now identified as Tract 3494), which would subdivide approximately 1,793 acres of Stewart Tract to support development of Phase 1 of the project. A third addendum was prepared in 2012, which addressed: (1) the adoption of the Tract 3765 VTM, a large lot vesting subdivision map for development of Phase 2 of the River Islands project consistent with the West Lathrop Specific Plan (WLSP); and (2) implementation of project modifications reflected in the Environment Impact Statement prepared by the US Army Corps of Engineers for Phase 2 of the River Islands at Lathrop Project.

In addition, the 2005 Addendum to the City of Lathrop Water, Wastewater, and Recycled Water Master Plan Environmental Impact Report identified the area under consideration in this addendum as an area where recycled water disposal or storage pond development could occur. The addendum describes the area as "already evaluated under CEQA and approved by the City of Lathrop for urban development but not for use as storage ponds" (City of Lathrop 2005: 2-2). The Southeast Stewart Tract Property was not analyzed in detail in the Addendum to the City of Lathrop Water, Wastewater, and Recycled Water Master Plan Environmental Impact Report, and no environmental clearance was established (City of Lathrop 2005: 2-5).

1.3 CALIFORNIA ENVIRONMENTAL QUALITY ACT GUIDELINES REGARDING AN ADDENDUM TO AN ENVIRONMENTAL IMPACT REPORT

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

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

unless the lead agency determines, on the basis of substantial evidence in light of the whole record, one or more of the following:

> (1) Substantial changes are proposed in the project which will require major revisions 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 which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
>
> (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:
>
> > (A) The project will have one or more significant effects not discussed in the previous EIR;
> >
> > (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
> >
> > (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternatives; or
> >
> > (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

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

> (1) any of the conditions described above for Section 15162 would require the preparation of a 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.

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

This addendum is intended to evaluate and confirm CEQA compliance for proposed recycled water storage and disposal facilities, which would be a change relative to what is described and evaluated in the River Islands at Lathrop SEIR. This addendum is organized as an environmental checklist, and is intended to evaluate all environmental topic areas for any changes in circumstances or the project description, as compared to the approved SEIR, and determine whether such changes were or were not adequately covered in the certified SEIR. This checklist is not the traditional CEQA Environmental Checklist, per Appendix G of the CEQA Guidelines. As explained below in Section 3.1, the purpose of this checklist is to evaluate the checklist categories in terms of any “changed condition” (i.e., changed circumstances, project changes, or new information of substantial

importance) that may result in a different environmental impact significance conclusion from the River Islands SEIR. The column titles of the checklist have been modified from the Appendix G presentation to help answer the questions to be addressed pursuant to CEQA Section 21166 and State CEQA Guidelines Section 15162, 15163, 15164 and 15168.

2 DESCRIPTION OF THE PROPOSED ACTION

The proposed action would expand the City of Lathrop's recycled water disposal system through the addition of three recycled water storage ponds, a spray field, and associated conveyance pipeline on a parcel that will be acquired by the project applicant (termed the "Southeast Stewart Tract Property"). The Southeast Stewart Tract Property (assessor's parcel number 213-290-02) is in the southeast Stewart Tract Planning Area of the WLSP, located immediately south of the River Islands at Lathrop project site, north of Interstate 5 (I-5), and east of Paradise Cut (See Exhibit 1, Southeast Stewart Tract Property Location). The Southeast Stewart Tract Property encompasses approximately 122 acres that are currently farmed with various row crops via furrow irrigation. Development of the Southeast Stewart Tract Property would be phased in response to demand for recycled water storage and disposal generated by buildout of the River Islands project.

PROJECT OVERVIEW

Stewart Tract was originally planned for urban development in the early 1990's. Evolving visions for development of the River Islands project site (encompassing a majority of the Stewart Tract) and other portions of the Stewart Tract were included in the City of Lathrop General Plan (1991) and the West Lathrop Specific Plan (1996). The portion of Stewart Tract north of I-5 was annexed into the City of Lathrop in 1997. The Draft SEIR for the River Islands at Lathrop Project (SCH # 1993112027) was released in October of 2002 and certified in 2003. The SEIR analyzed the conversion of approximately 4,905 acres of agricultural land and open space to mixed-use residential/commercial development. The proposed project includes an employment center, town center, dock facilities, residences, golf courses, and flood management elements within the River Islands site, as well as offsite infrastructure. At buildout, the proposed project is expected to house 31,680 residents and generate 16,751 jobs. Since certification of the SEIR in 2003, three addendums have been prepared to address tract map modifications and changes to the project description initiated primarily in response to the results of the ongoing U.S. Army Corps of Engineers' National Environmental Policy Act analysis of the project.

The River Islands project area was included in the City of Lathrop's wastewater facilities master plan and an EIR evaluating that plan, adopted in 1996. In 2001, the City prepared and adopted *the Lathrop Water, Wastewater, and Recycled Water Master Plan* to revise and update the City's previous Water Master Plan, Wastewater Facilities Master Plan, and Sewerage System Master Plan.

The River Islands at Lathrop project includes the use of recycled water (which has been treated to meet the state requirements for unrestricted use) to irrigate non-residential landscaping. Wastewater from the River Islands project would be collected, treated to the tertiary level (as defined in Title 22 of the California Code of Regulations[1]), at the Lathrop Water Recycling Plant (WRP) #1, and disposed of in accordance with the 2001 facilities master plan.

[1] As defined in Title 22 of the California Code of Regulations, Division 4. Environmental Health, Section 60301.230, "disinfected tertiary recycled water" means a filtered and subsequently disinfected wastewater that meets the following criteria:
(a) The filtered wastewater has been disinfected by either:
(1) A chlorine disinfection process following filtration that provides a CT (the product of total chlorine residual and modal contact time measured at the same point) value of not less than 450 milligram-minutes per liter at all times with a modal contact time of at least 90 minutes, based on peak dry weather design flow; or
(2) A disinfection process that, when combined with the filtration process, has been demonstrated to inactivate and/or remove 99.999 percent of the plaque forming units of F-specific bacteriophage MS2, or polio virus in the wastewater. A virus that is at least as resistant to disinfection as polio virus may be used for purposes of the demonstration.
(b) The median concentration of total coliform bacteria measured in the disinfected effluent does not exceed an MPN [most probable number] of 2.2 per 100 milliliters utilizing the bacteriological results of the last seven days for which analyses have been completed and the number of total coliform bacteria does not exceed an MPN of 23 per 100 milliliters in more than one sample in any 30 day period. No sample shall exceed an MPN of 240 total coliform bacteria per 100 milliliters.

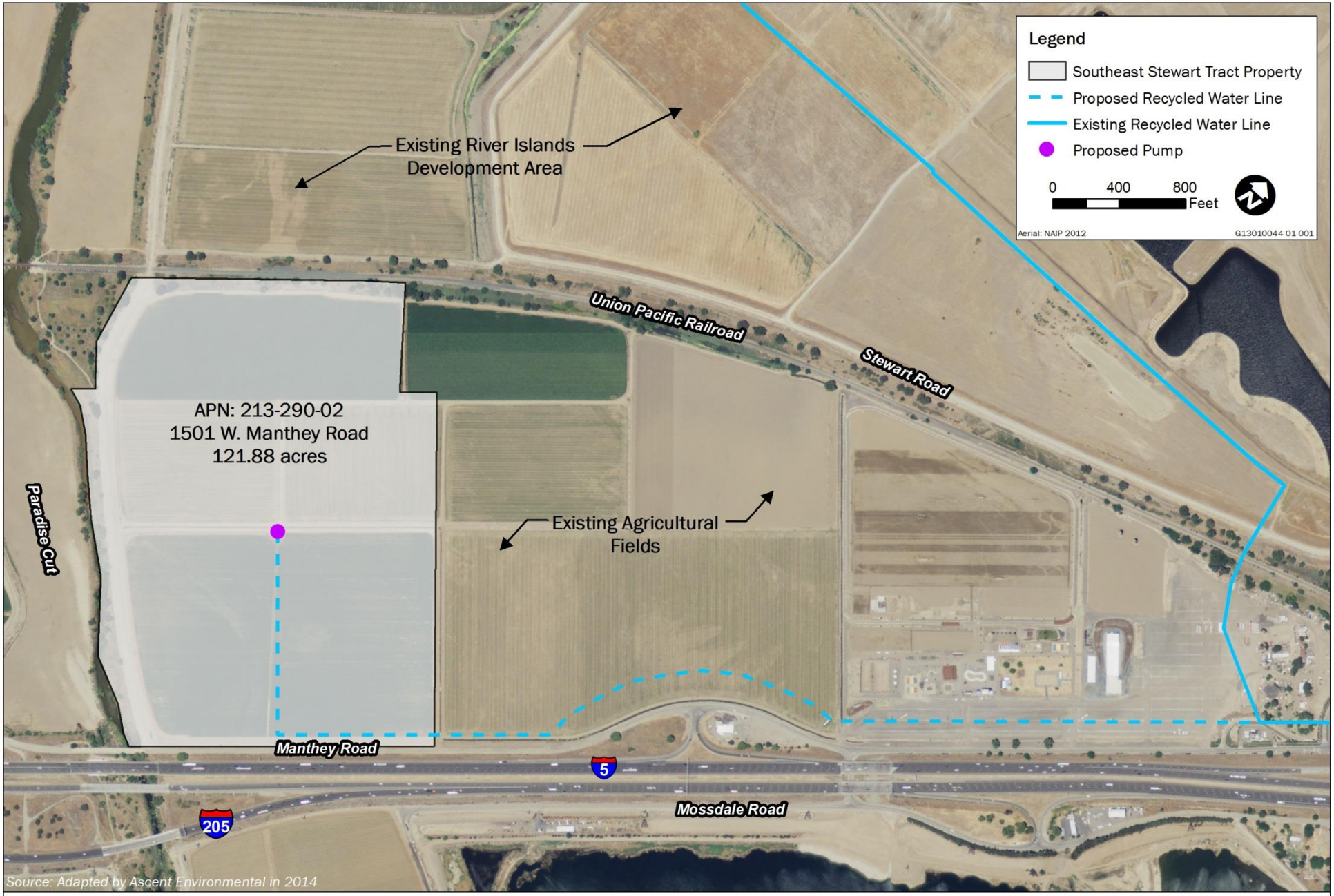

Exhibit 1 **Southeast Stewart Tract Property Location**

As proposed in the River Islands SEIR, demand for recycled water storage and disposal during Phase 1 of the project would be accommodated on other portions of the River Islands project site (i.e., the Phase 2 area). Phase 1 would generate an estimated 1.59 million gallons of recycled wastewater daily. Recycled water would be used to irrigate appropriate crops in existing agricultural areas within the Phase 2 development area (which includes existing spray fields) and, in the future, the Paradise Cut Conservation Area (along the western boundary of the site), as well as other remaining agricultural lands on and near the project site. As project facilities are developed, recycled water would be used to irrigate landscaped public areas, such as golf courses, parks, and road medians, in areas that meet the Regional Water Quality Control Board (RWQCB) requirements (i.e., areas where total dissolved solids in groundwater equals or exceeds 1,000 mg/l). At the time the SEIR was prepared it was assumed that recycled water would be applied at agronomic rates to minimize percolation below the root zone and avoid ponding at the surface. During winter months, insufficient demand for irrigation water at the project site would require storage of the treated wastewater. To accommodate project-generated recycled water flows during Phase 1, sufficient land would be set aside in the Phase 2 area to accommodate 40 acres of storage ponds and an estimated 444 acres of crop irrigation area. The use of the River Islands project site for interim onsite storage ponds is also an element of an early planned expansion of WRP #1 (i.e., the WRP #1 Phase 1 Expansion Project) and is evaluated in the EIR prepared for that project.

In Phase 2 of the River Islands project, the remainder of the project site would be developed with urban uses planned for the area as part of the project, and the use of the interim onsite recycled storage ponds would be phased out. The project would generate an estimated 3.65 million gallons of recycled water daily. Insufficient area would exist at the project site to dispose of the incremental increase in recycled water, and new recycled water storage ponds would be required to replace the lost capacity. The River Islands SEIR indicates that recycled water may be stored onsite in the golf course lakes and offsite in additional storage ponds, but does not identify potential offsite locations. Subsequent to the certification of the River Islands SEIR, the City adopted a Negative Declaration and Initial Study for off-site storage and disposal on the former Pishos Properties, utilizing the following mitigation measure adopted in the River Islands SEIR to address this significant impact:

> 4.11-g. Demand for Recycled Water Storage and Disposal Capacity for Phase 2. Elements of Phase 2 project development that would generate recycled water shall not commence until storage and disposal capacity is provided to address the incremental increase in recycled water generation associated with Phase 2 development. The additional disposal capacity may be provided through either land disposal or discharge to the San Joaquin River. If land disposal is selected, buildout shall not commence until:
>
> - sufficient acreage of storage ponds and spray fields is found for the disposal of the additional recycled water generated by the particular development area,
> - infrastructure is developed to convey this additional recycled water to the storage disposal areas,
> - the storage ponds are lined,
> - the application occurs at agronomic rates,
> - the offsite disposal system is operational.

This mitigation measure would again be utilized for the additional storage ponds and spray field in the Southeast Stewart Tract area.

PROJECT CHARACTERISTICS AND CHANGES TO THE PREVIOUSLY-APPROVED PROJECT

The proposed project modification analyzed in this addendum would locate recycled water storage and disposal sites on the Southeast Stewart Tract Property during Phases 1 and 2 of River Islands project development, and

would assist in fulfilling the requirement for the acquisition of adequate offsite recycled water storage and disposal facilities anticipated to be necessary prior to development of Phase 2. This proposal accelerates the development of offsite recycled water storage and disposal facilities relative to the phasing schedule identified in the River Islands SEIR, and provides a specific location for development of offsite facilities, which was not available at the time the River Islands SEIR was prepared. Operations of the recycled water storage ponds and disposal/spray field would follow all California Code of Regulations Title 22 standards for the storage and use of recycled water.

RECYCLED WATER STORAGE PONDS

Three storage ponds are proposed for the Southeast Stewart Tract Property, as identified in Table 1 and shown in Exhibit 2. The first pond (Pond S16) would be located in the northwestern portion of the Southeast Stewart Tract Property. Ponds S17 and S18 would be constructed in the southern portion of the site, with timing of construction determined in response to demand for recycled water storage as development of the River Islands project proceeds**.**

Table 1 Recycled Water Storage Ponds Proposed on the Southeast Stewart Tract Property

Storage Facility	Approximate Surface Area (Acres)	Approximate Storage Capacity (million gallons)
Pond S16	25	120
Pond S17	20	100
Pond S18	22	100
Total	**67**	**320**

Recycled water storage ponds would be designed and constructed as open reservoirs in accordance with the City of Lathrop Recycled Water System Design and Construction Standards. The storage ponds would be constructed using earth removed from the pond area to build levees around the ponds (i.e., using the "cut and fill" method of construction). Pond embankment (levee) crown widths would be at least 20 feet. To the extent feasible, the embankment height would not exceed approximately 26 feet above sea level (North American Vertical Datum 88), or 10 to 12 feet above the ground surface. Storage capacity for each pond would not exceed 1,500 acre feet, which would classify them as nonjurisdictional by the Department of Water Resources, Division of Safety of Dams. The ponds would be constructed to meet Federal Emergency Management Agency's 100 year flood requirements, DWR's 200 year flood requirements, and comply with the City of Lathrop's Floodplain Management Ordinance and the City of Lathrop's 100 year storm event capacity criteria.

The ponds would be designed with a minimum of 3 feet of freeboard above the 200 year flood stage elevation, or the height of anticipated wind generated waves during a 200 year flood event, whichever is greater. The bottoms of the ponds would be sloped to drain to minimize puddles and the associated risk of mosquito breeding when a pond is drained. The pond sites and the outside levee slopes could be landscaped and irrigated with recycled water. Storage pond sites would be fenced, and signs at the periphery of all storage facilities and use areas would notify the public of the use of recycled water. All three ponds would be located at least 100 feet from all domestic wells.

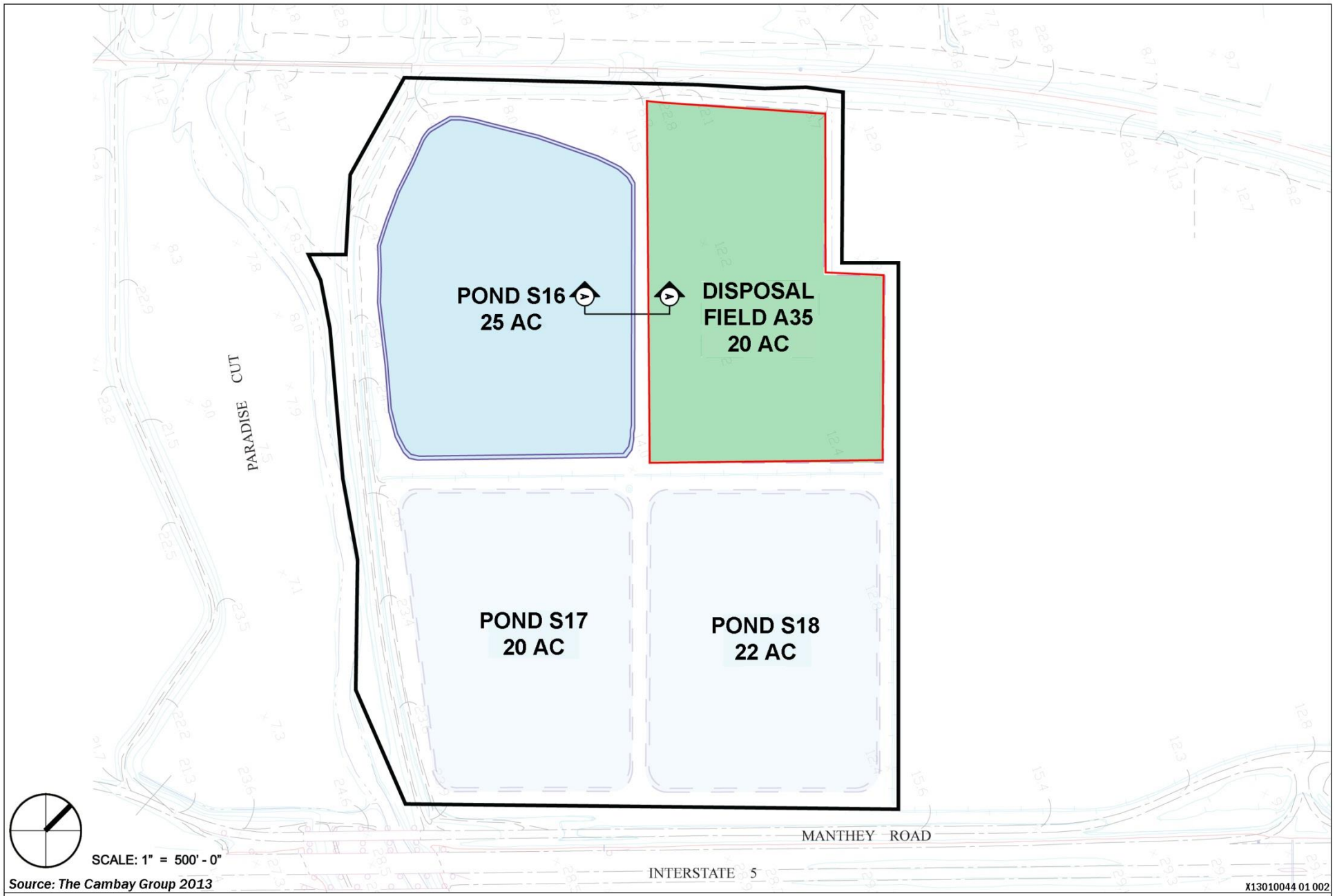

Exhibit 2

Proposed Recycled Water Storage Ponds and Spray Field

ASCENT ENVIRONMENTAL

PROPOSED RECYCLED WATER DISPOSAL FIELD

The Southeast Stewart Tract Property would include an approximately 20-acre recycled water disposal field (A35) in the northeastern portion of the site (see Exhibit 2). The following measures (consistent with Title 22 requirements) would be implemented to minimize the amount of recycled water runoff/overspray at the respective use areas and to assure system reliability:

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

CONVEYANCE PIPELINES AND PUMPS

Recycled water would be conveyed to each pond via a 16-inch recycled water line that would be extended approximately 1 mile west along Manthey Road from the existing 16-inch line at Manthey Road and Stewart Road and 0.25-mile northwest to the center of the Southeast Stewart Tract Property. Approximately 0.4-mile of this line, from the existing 16-inch line at Manthey Road and Stewart Road to the underpass connecting Manthey Road and Mossdale Road, was evaluated in the Environmental Impact Report for the Lathrop Water, Wastewater, and Recycled Water Master Plan (City of Lathrop 2001). This portion of the recycled water line is not analyzed in this addendum. The remaining portion of the line, and the pump that would be constructed near the center of the Southeast Stewart Tract Property, are evaluated in this addendum (Exhibit 1). No pump would be necessary for the first pond (S16) construction; however, installation of a pump station will likely be necessary to pump water to other spray field locations when the other ponds are constructed.

3 ENVIRONMENTAL CONSEQUENCES OF THE PROPOSED ACTION

3.1 EXPLANATION OF CHECKLIST EVALUATION CATEGORIES

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

3.1.1 WHERE IMPACT WAS ANALYZED IN THE RIVER ISLANDS SEIR

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

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

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

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

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

3.1.4 ANY SUBSTANTIALLY IMPORTANT NEW INFORMATION REQUIRING NEW ANALYSIS OR VERIFICATION?

Pursuant to Section 15162(a)(3)(A-D) of the State CEQA Guidelines, this column indicates whether new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental documents were certified as complete is available. This would require an update to the analysis of the previous environmental documents to verify that the environmental conclusions and mitigations remain valid. If the new information shows that: (A) the project

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

3.1.5 DO MITIGATION MEASURES IN THE RIVER ISLANDS SEIR ADDRESS/RESOLVE IMPACTS?

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

3.2 EXPLANATION OF DISCUSSION, MITIGATION MEASURES, AND CONCLUSIONS SECTIONS

3.2.1 DISCUSSION

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

3.2.2 MITIGATION MEASURES

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

3.2.3 CONCLUSIONS

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

3.3 IMPACT EVALUATION CHECKLIST

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

Environmental Issue Area	Where Impact was Analyzed in the River Islands SEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the River Islands SEIR Address/Resolve Impacts?
1. Aesthetics. Would the Project:					
a. Have a substantial adverse effect on a scenic vista?	4.17-9 to 4.17-10	No	No	No	N/A
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	4.17-9 to 4.17-11	No	No	No	N/A
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	4.17-9	No	No	No	N/A
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	4.17-11 to 4.17-12	No	No	No	N/A

DISCUSSION

The proposed recycled water storage and disposal sites would be located south of the project area described in the River Islands SEIR. The Southeast Stewart Tract property can be viewed from the southbound lanes of I-5, but is largely obscured from other vantage points by the levees of Paradise Cut to the west and a railroad berm to the north. The area is agricultural in character, and row crops are grown on the property.

The SEIR and previous addenda identify less-than-significant aesthetic resources impacts related to views of the site from surrounding lands, views from I-5 and the I-5/I-205/State Route 120 merge segment, views for recreational boaters, nighttime views, and views of the grain silos and the railroad. The design and function of walls and fences/consistency with the WLSP was determined potentially significant in the River Islands SEIR, but this impact would be reduced to less than significant with implementation of mitigation identified in the SEIR. This impact and mitigation measure are related to residential developments and do not apply to the proposed project modification.

There are no new circumstances since certification of the River Islands SEIR and previous addenda that would influence aesthetic impacts associated with the River Islands Project or the project modifications evaluated in this addendum, and there is no new information requiring analysis or verification.

a) A scenic vista is generally considered a view of an area that has remarkable scenery or a resource that is indigenous to the area. The Southeast Stewart Tract property does not provide any aesthetic resources that would be considered a scenic vista.

b) The Southeast Stewart Tract property is not a significant scenic resource, and I-5 is not a state scenic highway. Impacts to scenic resources would remain less-than-significant.

c) The proposed use of the Southeast Stewart Tract property for recycled water storage and disposal would be consistent with the existing, rural nature of the area. The property is apparent to motorists on

I-5, but views from the remainder of the River Islands development would be mostly obscured by the existing railroad berm.

d) Neither the recycled water storage ponds, nor the spray field used to dispose of water, would require additional lighting. The high walls of the ponds (approximately 10 to 15 feet above the ground surface) would limit the potential for reflections off the pond surface to create a new source of substantial glare.

Mitigation Measures

The SEIR identified less-than-significant impacts associated with views of the site from surrounding lands, views from I-5 and the I-5/I-205/SR 120 merge, views for recreational boaters, nighttime views, and views of the grain silos and the railroad bridge. The potentially significant impact associated with the design and function of walls and fences was reduced to a less-than-significant impact with mitigation. The River Islands SEIR does not provide aesthetics mitigation measures that would apply to use of the Southeast Stewart Tract property for recycled water storage and disposal, and the project modifications evaluated in this addendum would not generate any new significant impacts related to aesthetics; therefore, no new or modified mitigation measures are required.

Conclusion

Proposed changes to the River Islands at Lathrop Project since certification of the SEIR would not result in new significant impacts or substantially more severe impacts related to aesthetics. The combined analysis of aesthetics issues for the River Islands at Lathrop Project in this addendum, as well as the SEIR and previous addendums, is sufficient to meet CEQA requirements and support the approval of the proposed project modifications, if the City of Lathrop so chooses.

Environmental Issue Area	Where Impact was Analyzed in the River Islands SEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the River Islands SEIR Address/Resolve Impacts?
2. Agriculture and Forestry Resources. Would the project:					
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	4.13-13	No	No	No	Yes
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	4.13-13 to 4.13-14	No	No	No	N/A
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	Not evaluated	No	No	No	N/A
d. Result in the loss of forest land or conversion of forest land to non-forest land?	Not evaluated	No	No	No	N/A
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	4.13-14	No	No	No	N/A

DISCUSSION

The River Islands SEIR and previous addenda identified 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 would be reduced to less than significant with mitigation identified in the SEIR.

The WLSP EIR found that development of the Stewart Tact planning area would result in a significant and unavoidable impact due to an incremental annual loss of productive agricultural land. Loss of prime farmland was identified and an irreversible consequence of urbanization of the WLSP area. The city recognized that this impact was significant and unavoidable and could not be mitigated to less-than-significant levels, and the city adopted a statement of overriding considerations when it approved the WLSP.

There are no new circumstances since certification of the River Islands SEIR and previous addenda that would influence the agricultural impacts associated with the River Islands Project or the project modifications evaluated in this addendum, and there is no new information requiring analysis or verification.

a) The California Department of conservation has mapped the proposed recycled water storage and disposal site analyzed in this addendum as an area of Prime Farmland. This land has the soil quality, growing season, and moisture supply needed to produce sustained high agricultural yields (California Department of Conservation 2012). Conversion of Prime Farmland to a non-agricultural use (e.g., recycled water storage ponds) would be a significant impact.

b) The Southeast Stewart Tract property is not under Williamson Act contract (San Joaquin County 2013).

c, d) Impacts to forest land were not addressed in the River Islands SEIR. There is no forest land within the Southeast Stewart Tract property, and no such land would be converted as a result of the proposed recycled water storage or disposal.

e) The proposed project modification would irrigate 20 acres of the existing farmland with recycled water and would convert approximately 67 acres of recycled water storage ponds. Recycled water disposal is consistent with agricultural use of the site and properties to the east, and storage ponds would not result in conflicts with surrounding agricultural operations. Because the railroad berm would be a buffer between the new development and existing rural areas, there would be little to no potential for conflicts between agricultural practices and adjacent land owners.

Mitigation Measures

The River Islands SEIR identified significant and potentially significant impacts related to conversion of important farmland, Williamson Act cancellations, and adjacent landowner/user conflicts. With mitigation, adjacent landowner/user conflicts would be less than significant; however, the impacts associated with conversion of important farmland and cancellation of Williamson Act contracts would be significant and unavoidable.

The Southeast Stewart Tract property is not under Williamson Act contract. The following mitigation measure from the River Islands SEIR provides a feasible approach to address impacts from conversion of Prime Farmland to recycled water storage ponds.

4.13-a. Conversion of Important Farmland. The City of Lathrop would participate in the San Joaquin Multi-Species Habitat Conservation and Open Space Plan (SJMSCP). Fees would be paid to the SJCOG on a per-acre basis for lost agricultural land during development of both Phase 1 and Phase 2 of the proposed project. The SJCOG uses these funds to purchase conservation easements on agricultural and habitat lands in the project vicinity (in the Central Index Zone identified in the SJMSCP). The preservation in perpetuity of agricultural lands through the SJMSCP, a portion of which would consist of Prime Farmland and Farmland of Statewide Importance, would ensure the continued protection of farmland in the project vicinity, partially offsetting project impacts. However, because easements are purchased for land exhibiting benefits to wildlife, including a combination of habitat, open space, and agricultural lands, the overall compensation provided by the fee contribution for the proposed project would result in less than a 1:1 ratio of compensation specifically for agricultural land. In addition, no new farmland would be made available, and the productivity of existing farmland would not be improved as a result of SJMSCP implementation. Therefore, full compensation for losses of Important Farmland could not be achieved.

Because there are no feasible mitigation measures to reduce these impacts to a less-than-significant level, these impacts would be significant and unavoidable.

Conclusion

The proposed project modifications would increase the amount of important farmland converted by the River Islands project. Implementation of Mitigation Measure 4.13-a would not fully compensate for the loss of this resource. Although the proposal would contribute to the conversion of additional acreage of important farmland, this impact would not be substantially more severe than that analyzed in the SEIR. The combined analysis of agricultural impact for the River Islands at Lathrop Project in this addendum, as well as the SEIR and previous addendums, is sufficient to meet CEQA requirements and support the approval of the proposed project modifications, if the City of Lathrop so chooses.

Environmental Issue Area	Where Impact was Analyzed in the River Islands SEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the River Islands SEIR Address/Resolve Impacts?
3. Air Quality. Would the project:					
a. Conflict with or obstruct implementation of the applicable air quality plan?	4.5-18 to 4.5-20, 4.5-22 to 4.5-23	No	No	No	No
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	4.5-20	No	No	No	No
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	4.5-16 to 4.5-17, 4.5-20 to 4.5-22	No	No	No	Yes
d. Expose sensitive receptors to substantial pollutant concentrations?	4.5-18 to 4.5-20	No	No	No	No
e. Create objectionable odors affecting a substantial number of people?	4.5-18	No	No	No	No

DISCUSSION

Construction emissions would be generated from the development of recycled water storage ponds. The earthwork required for preparation of the Southeast Stewart Tract property would be minor relative to the construction that is proposed for the remainder of the River Islands project.

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

a, b, c) Construction activities associated with the proposed recycled water storage and disposal site would result in generation of oxides of nitrogen, reactive organic gases, and particulate matter less than 10 micrometers in diameter (PM_{10}). Violations of air pollutant standards for PM_{10} and ozone are regularly recorded at monitoring stations in the project region. Construction of the recycled water storage ponds would contribute to the emissions identified in the River Islands SEIR, but would not substantially increase project emissions. After construction, recycled water storage and disposal would not generate or emit toxic air contaminants.

d) The storage and disposal of recycled water would not generate substantial pollutant concentrations. Although construction of the storage ponds may generate PM_{10}, the ponds would be constructed before

the residences associated with the River Islands development are occupied. There are not currently sensitive receptors in the project area.

e) As indicated in the SIER, although there are existing residences located in proximity to the City's wastewater treatment plant, there have not been any odor complaints filed with the San Joaquin Valley Air Pollution Control District. The proposed project modification would involve the storage and disposal of disinfected water, with far less potential to cause odor than the treatment plant itself, and would be buffered from future residential development by the railroad tracks to the north, I-5 to the south, Paradise Cut to the east, and the Southeast Stewart Tract property to the east. Therefore, potential odor impacts from the proposed project modifications would be less than significant.

Mitigation Measures

The River Islands project would result in significant or potentially significant impacts related to increases in regional criteria pollutants during construction, increases in mobile source toxic air contaminants, and increases in long-term regional emissions. Increases in regional criteria pollutants during construction would be reduced to a less-than-significant impact with mitigation; increases in mobile source air contaminants and long-term regional emissions would be significant and unavoidable. The SEIR identified less-than-significant impacts associated with increases in odorous emissions, increases in stationary-source toxic air contaminants, increases in mobile source carbon monoxide concentrations, and consistency with air quality plans.

No new air quality impacts would result from implementation of the proposed project description changes evaluated in this addendum, and no new mitigation measures are required. The following mitigation measure from the River Islands SEIR would apply to construction of the wastewater storage ponds:

4.5-a: Increases in Regional Criteria Pollutants during Construction.

- *All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be effectively stabilized of dust emissions using water, chemical stabilizer/suppressant, or vegetative ground cover.*

- *All onsite unpaved roads and offsite unpaved construction access roads shall be effectively stabilized of dust emissions using water or chemical stabilizer/suppressant.*

- *All land clearing, grubbing, scraping, excavation, land leveling, grading, cut and fill, and demolition activities shall be effectively controlled of fugitive dust emissions utilizing application of water or by presoaking.*

- *During demolition of buildings all exterior surfaces of the buildings shall be wetted.*

- *When materials are transported offsite, all material shall be covered, effectively wetted to limit visible dust emissions, or at least 6 inches of freeboard space from the top of the container shall be maintained.*

- *All operations shall limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at least once every 24 hours when operations are occurring. (The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions. Use of blower devises is expressly forbidden.)*

- *Following the addition of materials to, or the removal of activities from, the surfaces of outdoor storage piles, piles shall be effectively stabilized of fugitive dust emissions utilizing sufficient water or chemical stabilizer/suppressant.*

- *Onsite vehicle speeds on unpaved roads shall be limited to 15 mph.*
- *Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from adjacent project areas with a slope greater than 1 percent.*
- *Wheel washers shall be installed for all exiting trucks and equipment, or wheels shall be washed to remove accumulated dirt prior to leaving the site.*
- *Excavation and grading activities shall be suspended when winds exceed 20 mph.*
- *The overall area subject to excavation and grading at any one time shall be limited to the fullest extent possible.*
- *Onsite equipment shall be maintained and properly tuned in accordance with manufacturer's specifications.*
- *When not in use, onsite equipment shall not be left idling.*

Conclusion

The combined analysis of air quality issues for the River Islands at Lathrop Project and the proposed project modifications in this addendum is sufficient to meet CEQA requirements and support the approval of the proposed project modifications, if the City of Lathrop so chooses.

Environmental Issue Area	Where Impact was Analyzed in the River Islands SEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the River Islands SEIR Address/Resolve Impacts?
4. Biological Resources. Would the project:					
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	4.14-25 to 4.14-31, 4.14-32 to 4.14-33 4.15-28 to 4.15-40	No	No	No	Yes
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	4.14-32 to 4.14-33	No	No	No	Yes
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	4.14-31 to 4.14-32	No	No	No	Yes
d. Interfere substantially with the movement of any native resident or migratory fish and wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	4.14-32	No	No	No	Yes
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	Not evaluated	No	No	No	N/A
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	4.14-32	No	No	No	Yes

DISCUSSION

The recycled water storage and disposal areas would increase the area of disturbance and the conversion of agricultural land, but would not appreciably alter the type or extent of development included in the project compared to the SEIR and previous addenda; therefore, with limited exceptions, at full buildout, impacts on terrestrial biological resources resulting from construction and operation of project development and the

implementation and effectiveness of associated mitigation measures would not be different from that described in the SEIR and previous addenda.

Construction of the proposed recycled water storage and disposal site would occur entirely on the landside of the existing levee. There would not be an effect on the aquatic habitat within Paradise Cut due to the sediment containment function provided by the levees and the additional sediment controls provided by the Stormwater Pollution Prevention Plan and associated best management practice implementation.

Impact 4.14-t in the SEIR analyzes the potential for impacts to biological resources associated with offsite facilities. The analysis indicates that the biological resources surrounding the project area are consistent with those found in the areas of River Islands and Paradise Cut evaluated in the SEIR. If sensitive habitats or special-status wildlife or plant species are adversely affected, the impacts would be consistent with those described for the project footprint.

There are no new circumstances since certification on the SEIR and the previous addenda that would influence impacts to biological resources associated with the River Islands at Lathrop Project or the proposed project modifications evaluated in this addendum, and there is no new information requiring analysis or verification. The project facilities would convert approximately 100 acres of agricultural land to recycled water storage facilities. The potential for the loss of agricultural land to impact biological resources is addressed in the SIER.

a) The proposed project modifications would result in conversion of approximately 67 acres of agricultural land to recycled water storage facilities. This conversion would represent a loss of potential foraging habitat for various colonial nesting birds, burrowing owl, Swainson's hawk, Aleutian Canada goose, and greater sandhill crane. The Southeast Stewart Tract property is actively cultivated with row crops, and there are no trees or shrubs in the area proposed for development. Therefore, the project is not considered potential nesting habitat for Swainson's hawk, burrowing owl, or other ground-nesting or streamside/lakeside-nesting birds. Birds nesting in isolated trees or shrubs or along riparian corridors are also unlikely to be impacted by the proposed conversion of agricultural land to recycled water storage ponds. Riparian brush rabbit have been documented in Paradise Cut and along the Union Pacific Railroad (UPRR) right of way. Although the proposed ponds would be setback from Paradise Cut and the UPRR right-of-way, construction of the storage ponds could affect riparian brush rabbit, if present.

b, c) Agricultural lands are locally and regionally abundant; they are not considered a sensitive natural plant community. Mapping of the project area conducted for the SEIR did not identify any sensitive biological resources on the Southeast Stewart Tract property.

d) Paradise Cut may provide a movement corridor for terrestrial and aquatic species. The proposed recycled water facilities would not impact Paradise Cut or interfere with wildlife movements within Paradise Cut. Although the Southeast Stewart Tract property is adjacent to Paradise Cut, all work would occur on the landside of the levee and outside of the levee prism.

e) The recycled water storage and disposal sites would be constructed and operated consistent with the applicable City of Lathrop policies and ordinances.

f) The biological resources section discusses species listed in the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan. The project would continue to participate in the plan, as stated in the SEIR.

Mitigation Measures

The project proponent would seek coverage under the SJMSCP to mitigate for project impacts and obtain incidental take authorization for SJMSCP-covered species under the City's Section 10(a) and Section 2081 permits. The Section 10(a) permit also serves as a special purpose permit for the incidental take of those species that are also covered under the Migratory Bird Treaty Act. Coverage under the SJMSCP would fully mitigate all impacts on special-status wildlife addressed in this section, with the exception of riparian brush rabbit.

The SEIR and previous addenda identified 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 offsite 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 SEIR and/or the previous addenda identified fisheries impacts related to:

- River Islands Development area (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),
- 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.

With implementation of the project modifications proposed in this addendum, impacts would be the same as those summarized above. No new biological resources impacts would result from the project modifications evaluated in this addendum, and no new mitigation measures are required. The following mitigation measure from the River Islands SEIR would apply to the project modifications evaluated in this addendum.

4.14-t Biological Resources Associated with Offsite Facilities
Biological resources potentially occurring at or near offsite project facilities and potential impact mechanisms would be the same as those identified previously for the RID, PCC, and PCIP Areas. Therefore, the mitigation approach described for the primary project area also would function for offsite facilities. The project applicant would participate in the SJMSCP for the offsite facilities and implement Mitigation Measures 4.14-b, -c, -d, -e, -f, -h, -j, -k, and –l (measures summarizing SJMSCP minimization measures) as appropriate based on resources present.

A determination of habitat types and resources that might be present in each facility area shall be made by a qualified biologist once the facility footprint is established and access for a reconnaissance-level survey is made available. A wetland delineation consistent with U.S. Army Corps of Engineers' methodology shall also be completed. These data, combined with resource identification surveys completed by the San Joaquin Council of Governments (SJCOG) as part of the SJMSCP, shall be used to determine the appropriate mitigation measures at each site.

Conclusion

In summary, recycled water storage and disposal on the Southeast Stewart Tract property would not result in any new significant impacts related to biology, significant changes in the severity of previously identified impacts related to biology, or significant changes in the effectiveness or applicability of mitigation measures and project alternatives related to biology. The combined analysis of biological resource issues in the SEIR and the proposed project modifications evaluated in this addendum is sufficient to meet CEQA requirements and support the approval of the proposed project modifications, if the City of Lathrop so chooses.

Environmental Issue Area	Where Impact was Analyzed in the River Islands SEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the River Islands SEIR Address/Resolve Impacts?
5. Cultural Resources. Would the project:					
a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	4.16-15 to 4.16-16	No	No	No	Yes
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	4.16-14 to 4.16-16	No	No	No	Yes
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Not evaluated	No	No	No	N/A
d. Disturb any human remains, including those interred outside the formal cemeteries?	4.16-16	No	No	No	Yes

DISCUSSION

There are no new circumstances or information that would influence the cultural resources conclusions contained in the SEIR, and there is no new information requiring additional analysis.

a, b) Impacts identified in the SEIR and previous addenda related to listed archaeological sites and historic properties involve the degradation of visual character in the vicinity of historic and archaeological resources. Historic and archaeological resources considered 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. This significant impact would be reduced to less than significant with mitigation. The Southeast Stewart Tract property is approximately 1 mile west of the identified resources and would not change the severity or significance of the project's impact on these resources.

Cultural resource impacts related to undiscovered/unrecorded resources and offsite resources address the potential to encounter currently unknown resources in the area proposed for development in the SEIR and within offsite utility corridors. There would be potential to encounter currently unknown cultural resources during construction of the recycled water storage ponds. The mitigation measure identified in the SEIR would reduce this impact to a less-than-significant level.

c) Sedimentary deposits associated with the San Joaquin River underlie the project site. Thick layers of clay, silts, and sands have buried any geologic units that could contain paleontological resources (if they ever existed).The project site does not contain any unique geologic features. No further discussion is necessary.

d) Although no human remains have been listed or recorded in the project area, they are known to occur in the project vicinity. As yet undiscovered human remains may be uncovered by earthmoving activities. Any disturbance of human remains would be a significant impact.

Mitigation Measures

The SIER identified significant or potentially significant impacts to listed archaeological sites, recorded archaeological sites, historic properties, undiscovered/unrecorded archaeological sites and human remains, and offsite resources. All impacts would be reduced to a less-than-significant level with mitigation.

No new cultural resources impacts would result from the project modifications evaluated in this addendum, and no new mitigation measures are required. Mitigation measures have been incorporated in the project that would address known archaeological resources and historic properties, as well as undiscovered/unrecorded archaeological sites. These mitigation measures, which would also apply to the project modifications evaluated in this addendum, are summarized below.

4.16-a. Listed Archaeological Sites.
Before project implementation, the City of Lathrop shall retain an archaeological historian to record identified archaeological resources in compliance with the Historic American Engineering Record standards.

4.16-b. Recorded Archaeological Sites.
The City of Lathrop shall retain a professional archaeological consultant to conduct testing at identified prehistoric sites. If any archaeological resources found at the site are concluded by the archaeologist to represent "unique archaeological resources," as defined by CEQA, the archaeologist shall recommend additional actions deemed necessary for the protection of these resources. The City shall ensure additional protection actions (if needed) are implemented prior to construction at the site.

4.16-c. Historic Properties.
The city of Lathrop shall retain an architectural historian to completely record identified historic properties before project implementation.

4.16-d. Undiscovered/Unrecorded Archaeological Sites.
Before initiation of construction or ground-disturbing activities associated with the proposed project, all construction personnel shall be alerted to the possibility of buried cultural resources. If artifacts or unusual amounts of stone, bone, or shell are uncovered during construction activities, work within 50 feet of the specific construction site at which the suspected resources have been uncovered shall be suspended, and the City of Lathrop Community Development Department/Planning Division shall be immediately contacted. At that time, the City shall retain a professional archaeological consultant. The archaeologist shall conduct a field investigation of the specific site and recommend mitigation deemed necessary for the protection or recovery of any cultural resources concluded by the archaeologist to represent significant or potential significant resources (as defined by CEQA).

4.16-e. Undiscovered/Unrecorded Human Remains.
If human remains are discovered, work within 50 feet of the remains shall be suspended immediately and the City of Lathrop Community Development Department/Planning Division and the County Coroner shall be immediately notified. If the County Coroner determines that the remains are Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours, and the NAHC guidelines for treatment and deposition of the remains shall be adhered to. The City of Lathrop shall retain an archaeological consultant to conduct a filed investigation and notify the most likely descendent identified by the NAHC.

4.16-f. Offsite Resources.

The City shall retain an archaeological consultant to review the results of the existing record searches and conduct field surveys, as needed, for those facilities. If cultural resources are found in the potential disturbance area, Mitigation Measures 4.16-a through 4.16-c shall be implemented, as appropriate. If discoveries are made during construction, Mitigation Measures 4.16-d to 4.16-e shall be implemented.

Conclusion

In summary, recycled water storage and disposal on the Southeast Stewart Tract property 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. The combined analysis of cultural resource issues in the SEIR and the proposed project modifications evaluated in this addendum is sufficient to meet CEQA requirements and support the approval of the proposed project modifications, if the City of Lathrop so chooses.

Environmental Issue Area	Where Impact was Analyzed in the River Islands SEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the River Islands SEIR Address/Resolve Impacts?
6. Energy and Natural Resources. Would the project result in:					
a. Substantial increase in demand for existing energy sources, or conflict with adopted policies or standards for energy use?	4.11-20	No	No	No	N/A
b. Use of non-renewable resources in a wasteful and inefficient manner	Not evaluated	No	No	No	N/A
c. Loss of significant mineral resources sites designated in the Countywide Plan from premature development or other land uses which are incompatible with mineral extraction?	4.7-22 to 4.7-23	No	No	No	No

DISCUSSION

There are no new circumstances since certification on the SEIR and previous addenda that would influence impacts to energy and natural resources associated with the River Islands development or the proposed project modifications evaluated in this addendum, and there is no new information requiring analysis or verification.

a, b) The River Islands project would increase demand for electricity and gas, which would be provided by Pacific Gas & Electric. The SEIR concluded that this increase would not be substantial in relation to the total amount of energy supplied by Pacific Gas & Electric and the quantity of energy available at buildout.

Recycled water storage and disposal would not require substantial energy use, nor would storage and disposal of recycled water result in the use of nonrenewable resources in a wasteful manner. In fact, use of recycled water can generate significant energy savings (NRDC 2009). When recycled water is used for applications like irrigation of city landscaping, the energy that would be used to extract the groundwater or surface water for that use is avoided.

c) The proposed recycled water storage and disposal site would be located in an area classified as MRZ-1 (areas where adequate information indicates that no significant mineral deposits are present or where it is judged that little likelihood exists for their presence) and MRZ-3 (areas containing mineral deposits, the significance of which cannot be evaluated from existing data). Implementation of the project modifications evaluated in this addendum would not result in the loss of significant mineral resources sites.

Mitigation Measures

The River Islands at Lathrop Project and the modifications addressed in this and previous addenda would not result in a substantial increase in demand for existing energy resources, conflict with adopted policies or

standards for energy use, or result in use of a non-renewable resource in a wasteful or inefficient manner. No mitigation is required.

The impact to mineral resources from implementation of the River Islands project was considered less than significant in the SEIR. Expanding the project area to include additional land where no mineral resources are known to exist would not result in new or more severe impacts to mineral resource sites. No mitigation is required.

Conclusion

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

Environmental Issue Area	Where Impact was Analyzed in the River Islands SEIR.	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the River Islands SEIR Address/Resolve Impacts?
7. Geology and Soils. Would the project:					
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. ii. Strong seismic ground shaking? iii. Seismic-related ground failure, including liquefaction? iv. Landslides?	4.7-19 to 4.7-22	No	No	No	Yes
b. Result in substantial soil erosion or the loss of topsoil?	4.7-18 to 4.7-19	No	No	No	No
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in: on-or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?	4.7-20 to 4.7-22	No	No	No	Yes
d. Be located on expansive soil, as defined in Table 18- 1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	4.7-22	No	No	No	Yes
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	No evaluated	No	No	No	N/A

DISCUSSION

The River Islands project area is located in the northern portion of the San Joaquin Valley, in an area that is characteristically flat.

The proposed recycled water storage and disposal site is underlain by Columbia fine sandy loam, partially drained, with clayey substratum, and Egbert silty clay loam, partially drained (US Soil Conservation Service 1992,

as mapped in Exhibit 4.7-1 of the River Islands SEIR). These soils are alluvial, and exhibit moderate to high shrink swell potential and low to moderate erosion potential.

The project has a relatively high groundwater table. The SEIR indicates that groundwater levels range from approximately 2 to 14 feet below the ground surface.

The nearest known surface trace of a fault designated as active by the California Geological Survey is the Greenville fault, located approximately 20 miles west of the project site. Additional seismic activity is associated with the Great Valley Fault System, which occurs at the tectonic boundary along the western boundary of the San Joaquin Valley, and has generated recent earthquakes.

There has not been a change in circumstances since certification of the SEIR that would influence geology, soils, and mineral resources impacts associated with the proposed storage or disposal of recycled water evaluated in this addendum.

a, c) Ground shaking is an unavoidable hazard for facilities in the San Joaquin Valley. Although the project area is unlikely to experience fault rupture, the proposed development would be anticipated to experience at least one major earthquake during the operational lifetime of the project that could cause structural damage to levees, pipelines, and storage ponds for recycled water.

The soils present in the area under evaluation are moderately sandy. The unimproved levee at the western boundary of the recycled water storage sites could experience lateral spreading or landslide. As determined in the River Islands SEIR, there is only a minor potential for structural damage and failure from ground lurching and settlement.

Based on the overall soil profiles and the relatively high groundwater levels on Stewart Tract, seismic risks associated with groundshaking and liquefaction could result in significant impacts. Although these impact mechanisms would not pose substantial risk to people, if a seismic event were to result in failure of a pond levee or rupture of a pipeline, structural damage and other property damage could occur.

b) Columbia soils have a low wind and water erosion potential, while Egbert soils have a low water erosion potential and a moderate wind erosion potential. Earthwork could expose soils to erosion. However, the topography of the site is flat, minimizing the potential for water erosion. In addition, the construction contractors would be required to comply with a Storm Water Pollution Prevention Plan, including all best management practices identified to minimize potential erosion.

d) Columbia soils have a moderate shrink-swell potential. Egbert soils have a high potential for shrink-swell behavior.

e) The Project modifications analyzed in this addendum would not include use of septic tanks or alternative methods for disposal of untreated waste water.

Mitigation Measures

The River Islands SEIR identified significant impacts related to ground shaking, liquefaction, lateral spreading and landslide, shrink-swell potential, and corrosive soils. These impacts would be reduced to a less-than-significant level with mitigation. Impacts related to erosion as a result of construction, as well as ground lurching and settlement, were determined to be less than significant. The mitigation measures identified in the River Islands SEIR that would be applicable to the proposed project modification are summarized below.

4.7-b. Seismic Hazards (Ground Shaking).
Project facilities shall be designed for maximum horizontal ground surface accelerations of at least 0.23 g.

4.7-c. Seismic Hazards (Liquefaction)/4.7-e. Seismic Hazards (Lateral Spreading and Landslide)/4.7-f. Shrink-Swell Potential/4.7-g. Corrosive Soils.
A design-level geotechnical study shall be completed for each project development before a grading permit is issued, which will identify appropriate means to minimize/avoid damage potential hazards. Geotechnical design recommendations included in each study shall be implemented during project construction.

Conclusion

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

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

DISCUSSION

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

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

Table 2 Greenhouse Gases	
Gas	**Sources**
Carbon dioxide (CO_2)	Fossil fuel combustion in stationary and point sources; emission sources includes burning of oil, coal, gas.
Methane (CH_4)	Incomplete combustion in forest fires, landfills, and leaks in natural gas and petroleum systems, agricultural activities, coal mining, wastewater treatment, and certain industrial processes.
Nitrous oxide (N_2O)	Fossil fuel combustion in stationary and point sources; other emission sources include agricultural soil management, animal manure management, sewage treatment, adipic acid production, and nitric acid production.
Chlorofluorocarbon (CFC), and Hydro-chlorofluorocarbon (HCFC)	Agents used in production of foam insulation; other sources include air conditioners, refrigerators, and solvents in cleaners.
Sulfur hexafluoride (SF_6)	Electric insulation in high voltage equipment that transmits and distributes electricity, including circuit breakers, gas-insulated substations, and other switchgear used in the transmission system to manage the high voltages carried between generating stations and customer load centers.
Perfluorocarbons (PFCs)	Primary aluminum production and semiconductor manufacturing.

Regulatory Setting – Greenhouse Gases and Climate Change

Federal Greenhouse Gas Regulations

Supreme Court Ruling

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

State Greenhouse Gas Regulations

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

In September 2006, the Governor of California signed Assembly Bill (AB 32) (Chapter 488, Statutes of 2006), the California Global Warming Solutions Act of 2006, which enacted Sections 38500–38599 of the California Health and Safety Code. AB 32 requires the reduction of statewide GHG emissions to 1990 levels by 2020. This equates to an approximate 15 percent reduction compared to existing statewide GHG emission levels or a 30 percent reduction from projected 2020 "business as usual" emission levels. The 1990 GHG emissions limit is approximately 430 million metric tons (MMT) carbon dioxide equivalent (CO_2e).

AB 32 Climate Change Scoping Plan

In December 2008, the California Air Resources Board (ARB) adopted its Climate Change Scoping Plan, which contains the main strategies California will implement to achieve reduction of approximately 169 MMT of CO_2e, or approximately 30 percent from the state's projected 2020 emission level of 596 MMT of CO_2e under a business-as-usual scenario (this is a reduction of 42 MMT CO_2e, or almost 10 percent, from 2002-2004 average emissions). The *Scoping Plan* also includes ARB-recommended GHG reductions for each emissions sector of the state's GHG inventory. The Scoping Plan calls for some of the largest reductions in GHG emissions to be achieved

by implementing the following measures and standards that would affect emissions from the project (ARB 2010):

- improved emissions standards for light-duty vehicles (estimated reductions of 27.7 MMT CO_2e);
- the Low-Carbon Fuel Standard (16.0 MMT CO_2e);
- energy efficiency measures in buildings and appliances (15.2 MMT CO_2e); and
- a renewable portfolio standard for electricity production (21.3 MMT CO_2e).

ARB has not yet published a recommended GHG reductions amount for local government operations; however, the *Scoping Plan* does state that land use planning and urban growth decisions will play an important role in the state's GHG reductions because local governments have primary authority to plan, zone, approve, and permit how land is developed to accommodate population growth and the changing needs of their jurisdictions (meanwhile, ARB is also developing an additional protocol for community emissions). ARB further acknowledges that decisions on how land is used will have large impacts on the GHG emissions that will result from the transportation, housing, industry, forestry, water, agriculture, electricity, and natural gas emission sectors. On March 18, 2011, the San Francisco County Superior Court issued a final decision that ARB had not complied with CEQA when it approved the Scoping Plan. Although the Scoping Plan was not found inconsistent with AB 32, the decision enjoined implementation of the Scoping Plan pending correction of the alternatives analysis and recertification of the CEQA document. ARB has not rescinded the Scoping Plan and has stated publicly that it will respond to the court's direction and continue with the implementation of AB 32.

Local Greenhouse Gas Regulations

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

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

a, b) Equipment necessary to construct the recycled water storage ponds would produce air pollutants that may contribute to local greenhouse gas emission. These activities would be limited in duration and conducted in compliance with the San Joaquin Valley Air Pollution Control District's performance standards for construction activities.

Mitigation Measures

No mitigation measures would be required.

Conclusion

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

Environmental Issue Area	Where Impact was Analyzed in the River Islands SEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the River Islands SEIR Address/Resolve Impacts?
9. Hazards and Hazardous Materials. Would the project:					
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	4.9-6	No	No	No	Yes
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	4.9-6 to 4.9-7	No	No	No	Yes
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	Not evaluated	No	No	No	N/A
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	4.9-6 to 4.9-7	No	No	No	Yes
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	Not evaluated	No	No	No	N/A
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working on the project area?	Not evaluated	No	No	No	N/A
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	4.10-9, 4.10-10	No	No	No	Yes
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	Not evaluated	No	No	No	N/A

DISCUSSION

The project site was not identified as a location of soil or groundwater contamination. A contemporary search of public databases maintained by the California Department of Toxic Substances Control (DTSC) and State Water Resources Control Board (SWRCB) indicate that no additional sites of potential contamination have been identified since the River Islands SEIR analysis. Project construction activities for installation of the storage pond and associated pipeline for the conveyance of recycled water to agricultural fields would involve use of earth-moving and trenching equipment within and at the margins of existing agricultural fields. If these activities occur on listed or unknown hazardous materials sites, excavation and disturbance of soils at the site could potentially release hazardous materials into the environment.

The SEIR discussed potential health hazards associated with the use of recycled water. If wastewater recycling facilities do not operate properly, the public could come into contact with contaminated water, resulting in a public health hazard. Although the recycled water that would be stored and applied on the property would be disinfected and highly treated, it is not treated to standards required for a potable water supply. The recycled water storage ponds would be designed and constructed in accordance with the City's Recycled Water System Design and Construction Standards. Public access to storage ponds would be controlled pursuant to Title 22 requirements (e.g., ponds for storage of treated effluent would be fenced and would have signs posted around the site perimeter). Although agricultural areas that are proposed for use as disposal areas would not be fenced, staff and the general public would be informed of the use of recycled water by advisory signs that would posted at the periphery of the areas. Furthermore, the bottoms of the ponds would be sloped to drain to minimize puddles and the associated risk of mosquito breeding. Because the recycled water would comply with Title 22 standards, and because the storage ponds and disposal sites would be physically separated from residences, potential public health impacts would be less than significant.

The proposed project modification would include uses of recycled water identified in the SEIR. Therefore, potential health risk impacts associated with the use of recycled water, which are considered less than significant in the SEIR, would also be considered less than significant under this proposal. There are no new circumstances since the certification of the SEIR that would influence hazards and hazardous materials impacts associated with the River Islands at Lathrop project or this addendum, and there is no new information requiring analysis or verification.

a, b, d) There is potential that previously farmed lands have residual contamination as a result of past and current agricultural activities. Excavation activities at or near areas of potential contamination (with substances such as petroleum hydrocarbons, pesticides, herbicides, and fertilizers) could expose construction workers to hazardous materials. No records of contamination on the Southeast Stewart Tract property were reported in the SEIR, and there are no current records on file with the California Department of Hazardous Substances or SWRCB indicating the potential for contamination on or adjacent to the site.

As discussed in the SEIR, the project applicant, builders, contractors, business owners, and others would be required to use, store, and transport hazardous materials in compliance with local, state, and federal regulations during project construction and operation. Because the project would implement and comply with the existing hazardous materials regulations, impacts related to creation of significant hazards to the public through routine transport, use, disposal, and risk of upset would not occur with project development.

c) The proposed recycled water storage and disposal site would not be within 0.25-mile of any existing or proposed school. Therefore, there would be no impact related to hazardous emissions or wastes generated during construction.

e, f) The project is not in the vicinity of a private airstrip or within 2 miles of a public airport. The nearest public use airport is the New Jerusalem Airport, located approximately 6 miles south of the project site in Tracy.

g) San Joaquin County's Hazardous Materials Area Plan was updated in 2008. Agencies must follow both the procedures of the area plan and the City of Lathrop Emergency Operations Plan. There is no indication that the River Islands development would hamper implementation of these plans. The SEIR does identify, however, the potential for obstruction of roadways during construction to impact access for emergency vehicles, and the potential for increased demand for water-related emergency services and facilities.

h) The River Islands project site, including the Southeast Stewart Tract property, has not been zoned as a fire hazard (CAL FIRE 2007). Although much of the property and surrounding land is currently farmed or fallow (and, therefore, has a low potential for wildfire), Paradise Cut, Old River, the San Joaquin River, and I-5 are natural fire breaks that would limit the spread of wildfire onto the property. The recycled water storage and disposal site would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. In fact, regular irrigation and water storage may further limit the potential for wildfire in the area.

Mitigation Measures

The SEIR and previous addenda 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 following mitigation measure from the SEIR would address the potential for undocumented contamination to occur on the Southeast Stewart Tract property, and reduce the potential impact to less than significant.

4.9-b. Hazardous Materials and Public Health – Exposure of Construction Workers, Residents, and Others to Hazardous Materials.

Before demolition of any structures associated with past and current farming operations, the project applicant shall investigate the extent to which soil and/or groundwater has been contaminated from these operations. This investigation would include, as necessary, analysis of soil and/or groundwater samples taken at or near the potential contamination sites. If the results indicate that contamination exists at levels above regulatory action standards, then the San Joaquin County Environmental Health Department (SJEHD) shall be notified and the site shall be remediated in accordance with recommendations made by SJEHD: RWQCB; and the DTSC; or other applicable federal, state, or local regulatory agencies. The agencies involved would be dependent on the type and extent of contamination.

The potential for implementation of the River Islands at Lathrop Project to obstruct roadways during construction such that access for emergency vehicles would be slowed was also identified as a significant impact in the SEIR. The proposed recycled water storage and disposal site could also result in obstruction of roadways during construction, although less substantial than associated with other portions of the River Islands development. Mitigation Measure 4.10-a, summarized below, would reduce this impact to a less than significant level. The proposed project modifications would not increase demand for water-related emergency services and facilities; no mitigation would be required.

4.10-a Obstruction of Roadways During Construction.
Per City requirements, the applicant/contractor shall prepare and implement traffic control plans for construction activities that may affect road rights-of-way. The traffic control plans must follow California Department of Transportation standards and be signed by a professional engineer. Where detours and road closures are necessary during construction, access to existing land uses shall be maintained at all times.

Conclusion

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

Environmental Issue Area	Where Impact was Analyzed in the River Islands SEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the River Islands SEIR Address/Resolve Impacts?
10. Hydrology and Water Quality. Would the Project:					
a. Violate any water quality standards or waste discharge requirements?	4.8-40 to 4.8-41	No	No	No	Yes
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	4.8-48 to 4.8-50	No	No	No	No
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or offsite?	4.8-38 to 4.8-39, 4.8-40 to 4.8-42	No	No	No	Yes
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?	4.8-39 to 4.8-40	No	No	No	No
e. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	4.11-19 to 4.11-20	No	No	No	No
f. Otherwise substantially degrade water quality?	4.8-33 to 4.8-38 4.8-42 to 4.8-43 4.8-48 to 4.8-49	No	No	No	Yes
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	4.8-43 to 4.8-47	No	No	No	No

Environmental Issue Area	Where Impact was Analyzed in the River Islands SEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the River Islands SEIR Address/Resolve Impacts?
10. Hydrology and Water Quality. Would the Project:					
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	4.8-43 to 4.8-47	No	No	No	No
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	4.8-43 to 4.8-47	No	No	No	No
j. Inundation by seiche, tsunami, or mudflow?	Not evaluated	No	No	No	N/A

DISCUSSION

The River Islands project site is located adjacent to Paradise Cut, the San Joaquin River, and Old River. The Southeast Stewart Tract property is adjacent to the eastern levee of Paradise Cut. Paradise Cut is a flood control bypass, which channels San Joaquin River flows that are high enough to overtop a rock weir south of the Southeast Stewart Tract property. The proposed development of additional property adjacent to Paradise Cut would not result in any new or substantially more significant impacts to hydrology and water quality. There are no new circumstances since certification of the SEIR that would influence hydrology and water quality impacts associated with the proposed use of land for recycled water storage and disposal.

a) Groundwater quality in the Lathrop area is generally considered poor because of saltwater intrusion and infiltration and runoff from the San Joaquin River and agricultural and urban areas. Potable water is derived from the deep aquifer, which is generally of better quality.

The proposed use of recycled water and the potential for percolation of pollutants was determined to have less-than-significant impacts to potable groundwater used for local private and municipal wells in the River Islands SEIR because the recycled water would be treated to tertiary levels, it would be applied following Title 22 standards, and the depth to potable groundwater is substantial (75 feet or more).

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

b) No storage pond water surface would be closer than 100 feet to any domestic well, no irrigation of effluent would occur within 50 feet of a surface water body or an irrigation canal, and infiltration basins would not be located within 150 feet of a surface water body or an irrigation canal drainage course.

c) As discussed in the River Islands SEIR, the River Islands development would substantially alter the drainage of the area. All alterations, including those made directly to Paradise Cut, the San Joaquin River, and Old River, would comply with state and federal regulations and would be designed and monitored ensure that the project is implemented in a manner that would not result in substantial erosion or siltation on- or offsite. It is important to note that these improvements are not yet implemented.

The project modifications proposed in this addendum would change the drainage of the Southeast Stewart Tract property. Currently, the property is permeable, allowing infiltration of stormwater, and ditches channel water to support agricultural use of the site. After project implementation, approximately 75 percent of the site would become ponds designed to retain water. During construction, the same measure to avoid erosion and siltation would be employed on this portion of the River Islands site as discussed in the SEIR and previous addenda. There would be no impact on or offsite erosion or siltation.

d) The River Islands project includes upgrade of Stewart Tract's levee system to substantially reduce the potential for flooding of the project area. Modeling completed for the SEIR and the 2012 Addendum indicate that improvements to the Paradise Cut levees would not change the potential for areas south and west of Paradise Cut to be inundated in the event of a 200-year flood. (Flooding would occur both with and without the levee improvements, and would not be exacerbated by the project.) Additionally, flood flows less than 200 year events would be accommodated within Paradise Cut with no negative effects to upstream areas because of the restoration of the trestle within the UPRR rail line in place of the existing box culverts, as discussed in the 2012 Addendum. As discussed in the River Islands SEIR, the project would have a less than significant impact on surface water runoff and management.

e) As discussed in the River Islands SEIR, the project would have a less than significant impact on stormwater runoff and management. The proposed recycled water storage and disposal facilities would not contribute additional runoff to the storm drain system. Stormwater would either be held in the ponds or would infiltrate the disposal field.

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

g, h, i) Based on Flood Insurance Rate Maps published by the Federal Emergency Management Agency, Stewart Tract is located within Flood Zone A (within the 100-year flood plain), and properties within this zone are subject to flooding from 100-year stormwater flows. Development of recycled water storage and disposal sites on the Southeast Stewart Tract property would not involve placement of housing, people, or structures within the 100-year flood plain, and no people or structures would be exposed to a significant risk of loss, injury, or death involving flooding from this project modification.

Flood waters have historically moved from the southeast to the northwest across Stewart Tract in the event of levee breach. The project's flood system design includes the proposed expansion of Paradise Cut and the inclusion of a "take-down" levee segment and a pump system to drain the southeast portion

of Stewart Tract if it were to flood. Based on the inclusion of these elements in the proposed River Islands project, impacts related to changes in flood-stage elevations in surrounding waterways and flood conditions for southeast Stewart Tract (including the Southeast Stewart Tract property) resulting from project implementation can be considered less than significant. Moreover, the recycled water storage ponds would be built to 200-year flood standards and would not themselves be inundated during a 200-year flood event. The ponds could conceivably act as an impediment to flood flows if a levee were to breach to the south and flood waters flowed northward on Stewart Tract. However, the UPRR railroad berm provides the primary impediment to the northward flow of flood waters and the ponds would not appreciably alter the pattern of floodwaters reaching the UPRR berm, passing through the berm at available facilities/passage structures (e.g., culverts, trestle), and water "backing up" if the flow towards the berm exceeds the capacity of the available passage structures.

j) Seiche and tsunami are unlikely to occur at the River Islands site because it is not located in proximity to the ocean or a lake. Mudflows have potential to occur where there are steep slopes, abundant loose sediment, and sufficient water to completely saturate the loose sediment. The levees surrounding the site are the only locations where gravitation pull could induce localized mudflow; however, the construction of the levees is regulated, and the materials and design are not prone to mudflow.

Mitigation Measures

The River Islands SEIR identified significant and potentially significant impacts associated with construction sediment and water quality contamination, earth moving in or adjacent to waterbodies, in-water project features, utility crossing of the San Joaquin River, maintenance dredging of back bays, increased boat traffic, and groundwater quality during construction. These impacts would be less than significant after mitigation. Less than significant or beneficial impacts were identified in association with the water quality of the interior lake, diversion effects on Old River hydrology and water quality, water discharges to the delta, flood protection, nonflood hydrology in surrounding waterways, groundwater quality and supply during project operation, and water supplies to other users.

The proposed project modifications would not involve earth moving in or adjacent to waterbodies, in-water project features, utility crossing of the San Joaquin River, maintenance dredging of back bays, or increased boat traffic. The mitigation measures included in the River Islands SEIR and summarized below would be applicable to the proposed project and would mitigate potential impacts to surface and groundwater quality. No new hydrology and water quality impacts would result from the project modifications evaluated in this addendum, and no new mitigation measures are required.

4.8a. RID Area Construction Sediment and Water Quality Contamination.
Two key plans will be prepared and implemented: a Stormwater Pollution Prevention Plan (including an erosion control plan and construction plan), and an environmental monitoring and mitigation compliance and reporting program. Development and implementation of the plans would be coordinated.

4.8-o. Groundwater Quality During Construction.
The Stormwater Pollution Prevention Plan must include measures to prevent/minimize sediment and contaminant releases into groundwater during excavations, as well as methods to clean up releases if they do occur.

Conclusion

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

Environmental Issue Area	Where Impact was Analyzed in the River Islands SEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the River Islands SEIR Address/Resolve Impacts?
11. Land Use and Planning. Would the project:					
a. Physically divide an established community?	4.2-12 to 4.2-13	No	No	No	No
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	4.2-13 to 4.2-16	No	No	No	No
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	4.2-13	No	No	No	No

DISCUSSION

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

a) The Southeast Stewart Tract property is located in an agricultural area bound on the west by Paradise Cut, on the north by railroad tracks and an associated embankment, and on the south by I-5. The established community of Lathrop is primarily located north and east of the project site. The proposed project modifications would not physically divide an established community.

b) The Southeast Stewart Tract property is currently zoned and is designated in the City of Lathrop General Plan as Urban Reserve as part of Southeast Stewart Track (UR-ST). The Urban Reserve District is applied to areas that have been identified for future urban expansion in applicable planning documents, such as the General Plan or any specific plan. The district is intended to preserve the availability of agricultural and vacant land required for future urban expansion, and to prevent the premature development of lands where the range of municipal-type services required by the general plan are not yet available.

The proposed use of the Southeast Stewart Tract property for the storage and disposal of treated wastewater would provide municipal services to an approved development. The area would not be available for future urban expansion, but would provide necessary municipal functions and would support orderly development elsewhere in the City of Lathrop.

The proposed project modification is consistent with applicable land use plans and policies.

c) The project site is located in the secondary zone of the Sacramento-San Joaquin Delta, and would be within the area addressed in the Delta Stewardship Council's 2013 Delta Plan. The Delta Plan was

developed to meet the requirements of the Delta Reform Act, which outlined the need for a policy that addressed the coequal goals of providing a more reliable water supply for California and protecting, restoring, and enhancing the Delta ecosystem. The Delta Plan reflects local land use designations and includes the project site as part of a city (outside of agricultural, open space, and natural preserve areas); the proposed project would not conflict with the goals of the Delta Plan.

The Southeast Stewart Tract property is within the area covered by the SJMSCP. The SJMSCP defers to city general plans and the County General Plan for land use designations. Therefore, with regard to land use and planning, the project's consistency with the city and county general plans implies consistency with the SJMSCP. Development of the Southeast Stewart Tract property would not conflict with SJMSCP conservation goals.

Mitigation Measures

The River Islands SEIR determined that the River Islands at Lathrop Project would have a less-than-significant impact on land use because the project would not conflict with any City of Lathrop environmental plans, goals, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. No new significant impacts or increase in the severity of previously-identified impacts to land use would occur as a result of the proposed project modifications. Therefore, no new mitigation is required.

Conclusion

Changes to the proposed project since the time of prior environmental review would not result in new or increased severity of impacts to land use. The combined analysis of land use and planning issues for the River Islands at Lathrop Project and the proposed project modifications in this addendum is sufficient to meet CEQA requirements and support the approval of the proposed project modifications, if the City of Lathrop so chooses.

Environmental Issue Area	Where Impact was Analyzed in the River Islands SEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the River Islands SEIR Address/Resolve Impacts?
12. Mineral Resources. Would the Project:					
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	4.7-22 to 4.7-23	No	No	No	No
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	4.7-22 to 4.7-23	No	No	No	No

DISCUSSION

No new circumstances or important information related to mineral resources have been identified since certification of the SEIR. As discussed above in Section 6(c), The proposed recycled water storage and disposal site would be located in an area classified as MRZ-1 and MRZ-3.

a, b) Irrigation of existing agricultural lands on the Southeast Stewart Tract property with recycled water would not affect the sand deposits that could be present underground. The storage ponds would not necessarily be permanent structures that would prevent future exploration for potential sand deposits. Therefore, no impact to mineral resources would occur.

Mitigation Measures

Impacts to mineral resources were determined to be less than significant in the River Islands SEIR. No new significant impacts or increase in the severity of previously-identified impacts to mineral resources would occur as a result of the proposed project modifications. Therefore, no mitigation is required.

Conclusion

Changes to the proposed project since the time of prior environmental review would not result in new or increased severity of impacts to mineral resources. The combined analysis of mineral resources for the River Islands at Lathrop Project and the proposed project modifications in this addendum is sufficient to meet CEQA requirements and support the approval of the proposed project modifications, if the City of Lathrop so chooses.

Environmental Issue Area	Where Impact was Analyzed in the River Islands SEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the River Islands SEIR Address/Resolve Impacts?
13. Noise. Would the project result in:					
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	4.6-15 to 4.6-17, 4.6-20 to	No	No	No	Yes
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	Not evaluated	No	No	No	N/A
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	4.6-17 to 4.6-20	No	No	No	Yes
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	4.6-15 to 4.6-17	No	No	No	Yes
e. For a project located within an airport land use plan or where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	4.6-26	No	No	No	N/A
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	4.6-26	No	No	No	N/A

DISCUSSION

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

a, c, d) The existing noise levels in the area of the proposed water storage and disposal site are primarily affected by traffic on I-5, I-205, and the UPRR railroad tracks. In addition, the area is agricultural, and farm equipment results in localized, short-term increases in ambient noise levels. As proposed, the storage ponds would be located south of the Employment Center developed as part of the River Islands at Lathrop Project, which would be an area of low noise sensitivity. The railroad berm would provide some noise shielding between the Southeast Stewart Tract property and the remainder of the River Islands development.

With implementation of the proposed project modifications, noise generation on the Southeast Stewart Tract property would be limited to construction phases. The level and type of noise produced by excavating the storage ponds and installing the wastewater delivery pipes would be consistent with the construction noise analyzed in other areas of the River Islands at Lathrop Project. Further, the proposed project modifications would not be located within 500 feet of a residential zone and would not introduce sensitive receptors to the area.

b) Vibration impacts were not analyzed in the River Islands SIER. The vibration that would result from grading and construction activities would be temporary and localized. Standard excavation practices are not anticipated to result in excessive groundborne vibration of noise levels. There are no federal, state, or local regulatory standards for groundborne vibration. In addition, as discussed above, there are not any existing or proposed sensitive receptors near the Southeast Stewart Tract Property. Therefore, no further analysis is requires. The impact would be less than significant.

e, f) The Southeast Stewart Tract property is not located in the 60-dBA noise contour of any nearby public airport or private air strips.

Mitigation Measures

The River Islands SEIR identified significant impacts related to increases in short-term construction-generated noise, stationary source noise generated by offsite land uses, and compatibility of the proposed land uses with projected onsite noise levels. Some impacts related to the compatibility of the proposed land uses with projected onsite noise levels would be significant and unavoidable; all other significant impacts would be reduced to less than significant with mitigation identified in the SEIR. Increases in existing traffic noise levels were determined to result in a less-than-significant impact.

Mitigation measures have been incorporated into the project to address identified impacts. The details of the various mitigation measures are provided in the River Islands SEIR. Since the project modifications would not introduce sensitive receptors to the project area or generate noise during operation, the only applicable mitigation measure is related to construction-generated noise, as summarized below.

4.6-a Increases in Short-Term Construction-Generated Noise.
All construction vehicles and equipment shall be equipped with properly operating and maintained mufflers and acoustical shields. Construction hours shall be limited where within 500 feet of a residential zone, and truck routes shall minimize travel adjacent to occupied residences.

Conclusion

Use of parcels within the River Islands at Lathrop Project area for recycled water storage and disposal was evaluated in the SEIR. As indicated in the SEIR, onsite recycled water storage and disposal could only be accommodated during early phases of the project, and offsite recycled water storage would have to be constructed at a later date. Therefore, constructing the recycled water storage ponds on the Southeast Stewart Tract Parcel, as evaluated in this addendum, would not change the potential noise impacts or conclusions of the SEIR and may reduce the noise produced by construction activities by eliminating the need for interim construction and demolition of onsite facilities.

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

Environmental Issue Area	Where Impact was Analyzed in the River Islands SEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the River Islands SEIR Address/Resolve Impacts?
14. Population and Housing. Would the Project:					
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	4.3-7 to 4.3-10	No	No	No	No
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	4.3-11	No	No	No	No
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	4.3-11	No	No	No	No

DISCUSSION

There are not any new circumstances or important information requiring analysis or that could result in a new significant impact.

a) The project modification identifies a location for recycled water storage and disposal to meet the requirements of the approved River Islands development. The need for offsite storage and disposal was identified in the River Islands SEIR. The use of the Southeast Stewart Tract property for this purpose would not directly or indirectly induce population growth in excess of the growth analyzed in the River Islands SEIR.

b, c) There are no residences located on the Southeast Stewart Tract property. There would be no impact on existing housing or people.

Mitigation Measures

The SEIR found the impacts related to population growth and housing demand during project construction and operation, and potential housing displacement, less than significant. No impacts were identified in association with housing policies. No mitigation measures were identified. No new significant impacts or increase in the severity of previously-identified impacts to population and housing would occur as a result of the proposed project modifications. Therefore, no new mitigation is required.

Conclusion

Changes to the proposed project since the time of prior environmental review would not result in new or increased severity of impacts to population and housing. The combined analysis of population and housing issues for the River Islands at Lathrop Project in the SEIR and the proposed project modifications in this addendum is sufficient to meet CEQA requirements and support the approval of the proposed project modifications, if the City of Lathrop so chooses.

Environmental Issue Area	Where Impact was Analyzed in the River Islands SEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the River Islands SEIR Address/Resolve Impacts?
15. Public Services.					
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times or other performance objectives for any the public services:					
i. Fire protection?	4.10-9 to 4.10-10	No	No	No	Yes
ii. Police protection?	4.10-11 to 4.10-12	No	No	No	Yes
iii. Schools?	4.10-12 to 4.10-15	No	No	No	Yes
iv. Parks?	4.12-7 to 4.12-10	No	No	No	N/A
v. Other public facilities?	4.10-12	No	No	No	Yes

DISCUSSION

There are no new circumstances since certification of the SEIR that would influence impacts to public services associated with implementing the River Islands at Lathrop Project or the modifications evaluated in this addendum. There is no new information requiring analysis for verification of the SEIR conclusions regarding the effects of these issues.

a) Recycled water storage ponds and spray fields do not generate demand for public services. Demand generated by the project as a whole would be the same as described in the SEIR and subsequent addenda.

Mitigation Measures

The SEIR and previous addenda identify public service impacts related to: obstruction of roadways during construction that could potentially slow 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 project was determined to have a beneficial impact on the demand for neighborhood and community parks.

The proposed recycled water storage ponds and disposal site would not contribute to demand for public services. Therefore, no mitigation is required.

Conclusion

The proposed project would not result in any new significant impacts related to public services. The combined analysis of public services for the River Islands at Lathrop Project and the proposed project modifications evaluated in this addendum is sufficient to meet CEQA requirements and support the approval of the proposed project modifications, if the City of Lathrop so chooses.

Environmental Issue Area	Where Impact was Analyzed in the River Islands SEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the River Islands SEIR Address/Resolve Impacts?
16. Recreation.					
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	4.12-7 to 4.12-11	No	No	No	No
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	4.12-7 to 4.12-11	No	No	No	No

DISCUSSION

The Southeast Stewart Tract property does not provide recreational opportunities, and the proposed use of the site for recycled water storage and disposal would not have any impact on the demand for recreation. There are no new circumstances since certification of the SEIR that would influence recreation impacts associated with the River Islands at Lathrop Project or the project modifications evaluated in this addendum, and there is no new information requiring analysis or verification.

a, b) The River Islands project proposes a system of parks and open space that would exceed the recreation services demand generated by the project. This excess of available parkland is expected to alleviate demand on, and therefore increase the availability of, existing parkland in the City of Lathrop.

Mitigation Measures

Impacts to recreation were determined to be beneficial or less than significant in the SEIR. No new impacts to recreational facilities are anticipated. Therefore, no mitigation is required.

Conclusion

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

Environmental Issue Area	Where Impact was Analyzed in the River Islands SEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the River Islands SEIR Address/Resolve Impacts?
17. Transportation/Traffic. Would the project:					
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	4.4-57 to 4.4-71	No	No	No	Yes
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	4.4-57 to 4.4-58, 4.4-61, 4.4-64 to 4.4-66	No	No	No	Yes
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	Not evaluated	No	No	No	N/A
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	4.4-59 to 4.4-61, 4.4-66 to 4.4-69, 4.4-71	No	No	No	No
e. Result in inadequate emergency access?	4.10-9	No	No	No	Yes
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	4.4-69 to 4.4-71	No	No	No	No

DISCUSSION

I-5 is a major north-south thoroughfare in the City of Lathrop. It continues north to Stockton, Sacramento, and Oregon, and south through the San Joaquin Valley to Los Angeles and San Diego. In the project vicinity, I-5 currently has five travel lanes in each direction (there were three lanes in each direction when the SEIR was prepared). There are buttonhook ramps onto I-5 from Manthey Road, which parallels I-5 south of the Southeast Stewart Tract Property.

Since completion of the SEIR in 2003 and adoption of previous addenda, some planned transportation infrastructure improvements have been implemented and some traffic generating land uses have been developed. However, these changes are consistent with the traffic model assumptions used in the SEIR and would not alter the results of the model. Therefore, although some conditions relative to traffic and transportation have changed since completion of the SEIR and the previous addenda, 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 proposed project modifications.

The use of land for recycled water storage and disposal would not increase traffic to the area. There would be no changes to the roadway network analyzed in the SEIR.

a, b) The project site would be accessed via Manthey Road. Manthey Road provides access to I-5 north of the proposed recycled water storage and disposal site, providing easy access for construction traffic without causing congestion of local roadways. Manthey Road becomes an unimproved dirt road south of Paradise Cut, and is not used for local through-traffic in the area under evaluation. The River Islands SEIR predicted that in 2015, without implementation of the River Islands project, the Manthey Road/I-5 southbound ramps (on-ramp and off-ramp) would operate at a LOS F in the AM peak hour and the Manthey Road/I-5 southbound on-ramp would operate at a LOS E. The analysis indicates that adding lanes to I-5, which has occurred, would result in acceptable freeway ramp operation.

c) As discussed above, the project is not in the vicinity of a private airstrip or within 2 miles of a public airport. In addition, the project would not result in a direct increase in air travel.

d, f) The proposed use of the Southeast Stewart Tract Property for recycled water storage and disposal would not result in the modification of any local roadways, or the introduction of incompatible uses. The project would not conflict with adopted policies, plans, or programs related to public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities

e) Construction activities could result in temporary lane closures, increased truck traffic, and other roadway effects that could slow or stop emergency vehicles, which could temporarily increase response times and impede existing service.

Mitigation Measures

The SEIR identified significant and potentially significant impacts related to: degradation of levels of service at signalized and unsignalized intersections; vehicle backups extending from one intersection through an adjacent intersection; degradation of freeway operations; degradation of freeway ramp/freeway mainline merge/diverge operations; degradation of rural two-lane roadway, Stewart Road, and the Manthey Road San Joaquin River Bridge operation; construction traffic; and the proposed onsite vehicle, pedestrian, and bicycle circulation. The potential for construction to delay emergency access due to roadway obstruction was also considered a significant impact. All impacts would be reduced to a less-than-significant level with mitigation except degradation of freeway operations and degradation of freeway ramp/freeway mainline merge/diverge operation, which would be significant and unavoidable. Impacts associated with degradation of weaving movements on I-5 to/from Mossdale Road/Manthey Road hook ramps and provisions for public transit were considered less than significant.

Mitigation measures have been incorporated into the project to address identified impacts. The details of the various mitigation measures for traffic impacts are provided in Appendix B of the River Islands SEIR. Those mitigation measures that may affect Manthey Road, which would provide access to the proposed recycled water

storage and disposal site, are summarized below. The proposed project modification would not change the impact conclusions of the SEIR, and no additional mitigation would be required.

4.4-d./4.4-m. Degradation of Freeway Ramp-Freeway Mainline Merge/Diverge Operations.
To eliminate the degradation of freeway ramp-freeway mainline merge/diverge operations, the City of Lathrop shall ensure that the project applicant pays its applicable Traffic Impact Fees to provide that the necessary improvements are completed at the appropriate time, based upon project phase or the results of the Stewart Tract Traffic Monitoring Program.

- *In Phase 1a, increase the length of the Manthey Road southbound on-ramp acceleration lane to I-5 adjacent to the freeway by at least 10 feet (or to the minimum length required by Caltrans) under existing baseline (2001) + project conditions, or at least 130 feet under 2007 conditions.*

- *Note that the River Islands SEIR indicates that Caltrans would be unlikely to approve implementation of this mitigation measure for the southbound on-ramp. Further, the impact on the Manthey Road/I-5 interchange would be temporary because the access would be disconnected after implementation of Phase 1a of the River Islands project. Therefore, there would be a temporary significant and unavoidable impact (until the River Islands Parkway Bridge is constructed).*

- *In Phase 1a, increase the length of the Manthey Road northbound on-ramp acceleration lane to I-5 adjacent to the freeway by at least 10 feet (or to the minimum length required by Caltrans) under 2007 conditions.*

4.4-g./4.4-p. Stewart Road Operation.
Two alternative measures for mitigating construction traffic during Phase 1a were identified.

- *1: Construct Stewart Road in its existing alignment to the following criteria before the roadway is used by construction traffic.*
  - *Provide two 12-foot-wide travel lanes.*
  - *Provide two 8-foot-wide paved shoulders.*
  - *Provide at least a 10-foot clearance between the edge of the travel lanes and any obstructing objects along the edge of the road, including the signal/gate standards at the UPRR crossing.*
  - *Provide stopping light distances at all curves that provide a 250 percent safety factor for the posted curve speed limit.*
  - *Provide a roadway structural section that should last at least one year beyond the projected closure of the road to project traffic.*
  - *Provide radii of curvature to meet minimum City of Lathrop standards.*

- *2: Have construction traffic enter the River Islands site via Manthey Road, and the Paradise Cut levee road via an existing private crossing of the UPRR tracks. Due to the inadequate width of the levee to allow two opposing lanes of traffic, the levee would be used to allow west bound construction traffic onto the site, and a new temporary road would be constructed at the base of the levee to allow eastbound traffic to exit the site. The existing, private railroad crossing would only be used by construction traffic during daylight hours.*

4.4-i./4.4-v. Construction Traffic.

- *All degradation of pavement conditions along Stewart Road and Manthey Road due to River Islands construction traffic will be fully repaired to the satisfaction of the City of Lathrop. City staff and the project applicant shall jointly monitor the condition of each roadway every six months.*

- *No project construction traffic shall be allowed to use Paradise Road.*

- *No construction delivery track traffic shall be allowed to on the local roadway network before 8:00 AM or after 4:30 PM.*

- *No construction worker traffic shall be allowed on the local roadway network between 6:30 and 8:00 AM and between 4:30 and 6:00 PM.*

4.10-a. Obstruction of Roadways during Construction.

Per City requirements, the applicant/contractor shall prepare and implement traffic control plans for construction activities that may affect road rights-of-way. During project construction, access to existing land uses shall be maintained at all times, with detours being utilized as necessary during road closures.

Conclusion

No changes in circumstances or revisions of the proposed project would result in new or substantially more severe significant traffic and transportation impacts, compared to the analysis presented in the SEIR. The combined analysis of the transportation issues for the River Islands at Lathrop Project in the SEIR and this addendum is sufficient to meet CEQA requirements and support the approval of the proposed project modifications, if the City of Lathrop so chooses.

Environmental Issue Area	Where Impact was Analyzed in the River Islands SEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the River Islands SEIR Address/Resolve Impacts?
18. Utilities and Service Systems. Would the Project:					
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	4.11-15	No	No	No	Yes
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	4.11-15 to 4.11-17	No	No	No	Yes
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	4.11-19 to 4.11-20	No	No	No	No
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	4.11-9 to 4.11-15	No	No	No	No
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	4.11-15 to 4.11-16	No	No	No	Yes
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	4.10-16	No	No	No	No
g. Comply with federal, state, and local statutes and regulations related to solid waste?	4.10-16	No	No	No	No

DISCUSSION

In the River Islands SEIR, wastewater treatment and recycled water disposal are addressed at a project level of detail for Phase 1 and at a program level for Phase 2. Recycled water treatment and disposal were addressed at the program level because approaches to providing these utility services for this project phase had not been fully developed. This addendum defines the approach to providing recycled water storage and disposal for both Phase 1 and Phase 2 that differs from the approach in the SEIR and provides a project-level analysis of this modified project feature.

As indicated in the 2007 Addendum to the SEIR (pp. 3-20), "since certification of the SEIR and related project approvals, the South San Joaquin Irrigation District 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 South San Joaquin Irrigation District, 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."

There are no new circumstances involving new impacts or new information requiring analysis. Recycled water storage and disposal areas would provide utility service (i.e., wastewater treatment and recycled water storage/disposal) in support of planned development and would not themselves generate substantial demand for utility services that could result in significant environmental effects.

a, b, d, e) The City of Lathrop would provide potable water to the River Islands development. The River Islands Project would exceed the capacity of the City wells available to serve the project in 2002. Operation of the project would be dependent on operation of planned wells and the South County Surface Water Supply Project.

The River Islands SEIR concluded that the River Islands development area may have sufficient land application area to dispose of recycled water generated by the proposed project. There would not, however, be enough area on the project site at full buildout to construct storage ponds sufficient to store all of the recycled water generated by the proposed project. Therefore, offsite recycled water disposal and/or river discharge, as evaluated in the Master Plan and Master Plan EIR, would be required for Phase 2 of the River Islands Project.

c) The River Islands project would not result in a significant impact related to stormwater and surface water management. The project includes a system of parks, created wetlands, and a central lake to manage, store, and clean stormwater runoff. The proposed project modifications would convert agricultural land to recycled water storage ponds.

f, g) Use of the Southeast Stewart Tact Property for recycled water storage and disposal would not result in a substantial increase in the waste generation estimates included in the SEIR. The Foothill Sanitary Landfill has sufficient capacity to accommodate the solid waste generated by the River Islands Project through at least 2040, and the project would comply with all federal, state, and local statutes and regulations related to solid waste reduction and recycling.

Mitigation Measures

The SEIR and previous addenda identified public utilities impacts related to:

- demand for potable water (significant),
- environmental impacts associated with the development of new city wells (less than significant based on previously adopted mitigation identified in the City's Water, Wastewater, and Recycled Water Master Plan EIR),
- demand for wastewater treatment capacity (significant),
- environmental impacts associated with the expansion of 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 water 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 adopted as part of the River Islands Project. (Note that WRP since preparation of the SEIR, WRP #1 has been expanded and WRPs #2 and #3 are no longer proposed.)

The SEIR and previous addenda 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 because of sufficient available capacity at existing landfills.

Project modifications would not result in new significant or potentially significant impacts that would require mitigation. The proposed project modifications would address the requirements of Mitigation Measure 4.11-g, which is summarized below.

4.11-g. Demand for Recycled Water Storage and Disposal Capacity for Phase 2.
Elements of Phase 2 project development that would generate recycled water shall not commence until storage and disposal capacity is provided to address the incremental increase in recycled water generation associated with Phase 2 development. The additional disposal capacity may be provided through either land disposal or discharge to the San Joaquin River. If land disposal is selected, buildout shall not commence until:

- *sufficient acreage of storage ponds and spray fields is found for the disposal of additional recycled water generated by the particular development area,*
- *infrastructure is developed to convey this additional recycled water to the storage and disposal areas,*
- *storage pond construction and application methods are approved by the RWQCB (which, at the time the SEIR was prepared, included lining the storage ponds and land application at agronomic rates), and*
- *the offsite disposal system is operational.*
- *If river disposal is selected, buildout shall not commence until river discharges of recycled water are permitted for expanded and/or new WRPs under the Master Plan.*

Conclusion

The combined analysis of utilities and service systems for the River Islands at Lathrop Project in the SEIR and this addendum is sufficient to meet CEQA requirements and support the approval of the proposed project modifications, if the City of Lathrop so chooses.

Environmental Issue Area	Where Impact was Analyzed in the River Islands SEIR.	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Mitigation Measures in the River Islands SEIR Address/Resolve Impacts?
19. Mandatory Findings of Significance.					
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	4. Affected Environment, Environmental Consequences, and Mitigation Measures	No	No	No	Yes
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when view in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	5. Cumulative Impacts	No	No	No	No
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	4. Affected Environment, Environmental Consequences, and Mitigation Measures	No	No	No	Yes

Conclusion

a, c) As described in the preceding sections, the proposed project modifications evaluated in this addendum would not change any of the impact conclusions of the SEIR, and would not substantially increase the severity of identified impacts. As described in the SEIR, the project would have significant and unavoidable adverse impacts related to short term degradation of freeway operations, degradation of freeway ramp/freeway mainline merge/diverge operation, increases in mobile source toxic air contaminants, increases in long-term regional emissions, compatibility of the proposed land uses with projected onsite noise, conversion of important farmland, and Williamson Act contract cancellations. All other impacts would be less than significant.

b) In Chapter 5, Cumulative Impacts, of the Draft SEIR, the River Islands at Lathrop Project is considered together with related projects and regional development for each of the environmental issue areas evaluated in the SEIR. Consistent with the intent of a cumulative analysis, where the combined effects of multiple projects are to be considered, the various elements of the River Islands at Lathrop Project are generally evaluated as a whole. The River Islands at Lathrop Project would result in direct and indirect

cumulatively considerable incremental contributions to significant cumulative impacts related to traffic, noise, public services, agricultural resources, and aesthetic resources.

3.4 CONCLUSIONS REGARDING THE ENVIRONMENTAL ANALYSIS OF THE PROPOSED PROJECT MODIFICATIONS

Based on the analysis of the categories of environmental impacts evaluated above, implementing the River Islands at Lathrop Project with the modifications described in this document would result in none of the conditions described in Section 15162 of the State CEQA Guidelines calling for preparation of a SEIR. In summary, no altered circumstances or new information of substantial importance has been identified since certification of the SEIR, and the project modifications evaluated in this addendum would not: 1) result in any new environmental effects; 2) substantially increase the severity of any previously identified effects; 3) result in mitigation measures or alternatives previously found to be infeasible becoming feasible; and 4) result in availability/implementation of mitigation measures or alternatives that are considerable 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 SEIR is the appropriate CEQA document to evaluate the record the minor project modifications described in this document.

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