PUBLIC REVIEW DRAFT

INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION

FOR THE

NORTH CROSSROADS BUSINESS CENTER

Louise Avenue Between Harlan Road and Howland Road
City of Lathrop, CA

May 2018

Prepared for:

City of Lathrop
390 Towne Centre Drive
Lathrop, CA 95330
209-941-7260

Prepared by:

BaseCamp Environmental, Inc.
115 S. School Street, Suite 14
Lodi, CA 95240
209-224-8213

BaseCamp Environmental

PUBLIC REVIEW DRAFT

INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION

FOR THE

NORTH CROSSROADS BUSINESS CENTER PROJECT

Louise Avenue Between Harlan Road and Howland Road
City of Lathrop, CA

May 2018

Prepared for:

City of Lathrop
390 Towne Centre Drive
Lathrop, CA 95330
209-941-7260

Prepared by:

BaseCamp Environmental, Inc.
115 S. School Street, Suite 14
Lodi, CA 95240
209-224-8213

NEGATIVE DECLARATION

A. General Project Information

Project Title:	North Crossroads Business Center
Lead Agency Name and Address:	City of Lathrop Community Development Department, Planning Division 390 Towne Centre Drive Lathrop, CA 95330
Contact Person and Phone Number:	Rick Caguiat 209-941-7260
Project Location:	The project site is located within Sub-Plan Area #1 in the central portion of the City of Lathrop in San Joaquin County. The project site is adjacent to and south of Louise Avenue, east of Harlan Road, west of Howland Road, and west of the Union Pacific Railroad. Existing uses on the project site include warehousing and manufacturing. The site is comprised of two parcels, Assessor's Parcel Number (APN) 198-120-08 and 198-140-16. The site is shown on the USGS Lathrop, California, 7.5-minute quadrangle map, located within Section 25, Township 1 South, Range 6 East, MDBM
Project Sponsor Name and Address:	Reynolds & Brown 1200 Concord Avenue, Suite 200 Concord, CA 94520 Dana Parry
General Plan Designation:	General Industrial
Zoning:	General Industrial
Description of Project:	The project involves development of approximately 1.0 million square feet of new warehouse and distribution facilities to accommodate future use by supply chain companies that require logistics management. The facility will accommodate truck and rail transport of goods that are received and distributed from this location. See detailed project description in Chapter 2.0.
Surrounding Land Uses and Setting:	The project is located adjacent to existing industrial and commercial land uses to the south, east, and west, and a residential area to the north of Louise Avenue. The project site is currently developed and includes three existing industrial buildings.

Other Public Agencies Whose Approval is Required: City of Lathrop; San Joaquin County Environmental Health Department; San Joaquin Valley Air Pollution Control District

B. Environmental Factors Potentially Affected

The environmental factors checked below may be significantly affected by this project, involving at least one impact that is a "Potentially Significant Impact" prior to mitigation. Mitigation measures that would avoid potentially significant impacts or reduce them to a less than significant level have been described below for each resource, and in the Summary at the end of Chapter 1.0.

	Aesthetics		Agriculture and Forestry Resources		Air Quality
√	Biological Resources	√	Cultural Resources	√	Geology/Soils
	Greenhouse Gas Emissions	√	Hazards & Hazardous Materials		Hydrology/Water Quality
	Land Use/Planning		Mineral Resources	√	Noise
	Population/Housing		Public Services		Recreation
√	Transportation/Traffic	√	Utilities/Service Systems	√	Mandatory Findings of Significance

C. Lead Agency Determination

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

√ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project and/or mitigation measures would reduce potential effects to a less than significant level have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared. All applicable mitigation measures are shown in the Summary Table (Table 1-1) at the end of Chapter 1.0.

I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only

the effects that remain to be addressed.

Lead Agency Determination Signature:

Original signature on file at City of Lathrop *May 3, 2018*

Rebecca Schmidt, Community Development Director Date

City of Lathrop Community Development Department

TABLE OF CONTENTS

LIST OF TABLES

LIST OF FIGURES

APPENDICES

LIST OF ACRONYMS

AB	Assembly Bill
ACOE	U.S. Army Corps of Engineers
APN	Assessor's Parcel Number
ARB	California Air Resources Board
BMPs	Best Management Practices
CalEEMod	California Emissions Estimator Model
CALGREEN	California Green Building Code
Cal Water	California Water Service Company
CCAP	Climate Change Action Plan
CCTC	Central California Traction Company
CDFW	California Department Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CLOMR	Conditional Letter of Map Revision
CNDDB	California Natural Diversity Data Base
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	carbon monoxide
CO2	carbon dioxide
CO2e	carbon dioxide equivalent
CUPA	Certified Unified Program Agency
CVFPB	Central Valley Flood Protection Board
CVFPP	Central Valley Flood Protection Plan
dB	decibel
dBA	A-weighted decibels
DWR	California Department of Water Resources
EIR	Environmental Impact Report
EMFs	electromagnetic fields
EPA	U.S. Environmental Protection Agency
EPAP	Existing Plus Approved Projects
ESA	Environmental Site Assessment
ETRIP	Employer Trip Reduction Implementation Plan
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
GAMAQI	Guide for Assessing and Mitigating Air Quality Impacts (SJVAPCD)
GHGs	Greenhouse Gases
gpd	gallons per day
IS/MND	Initial Study/Mitigated Negative Declaration
ISR	Indirect Source Rule
ITMMs	Incidental Take Minimization Measures

LAFCO	Local Agency Formation Commission
Ldn	Day-Night Sound Level
LEED	Leadership in Energy and Environmental Design
Leq	equivalent continuous sound level
Lmax	maximum noise level
LOS	Level of Service
mgd	million gallons per day
MMT	million metric tons
MSR	Municipal Service Review
MS4	municipal separate storm sewer system
NOx	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
PM10	particulate matter 10 microns or less in diameter
PM2.5	particulate matter 2.5 microns or less in diameter
ROG	reactive organic gases
RWCF	Regional Wastewater Control Facility
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SJCOG	San Joaquin Council of Governments
SJMSCP	San Joaquin County Multi-Species Open Space and Habitat Conservation Plan
SJRTD	San Joaquin Regional Transit District
SJVAPCD	San Joaquin Valley Air Pollution Control District
SR	State Route
STAA	Surface Transportation Assistance Act
SUSD	Stockton Unified School District
SWMP	Storm Water Management Program
SWPPP	Storm Water Pollution Prevention Plan
SWQCCP	Storm Water Quality Control Criteria Plan
SWRCB	State Water Resources Control Board
TACs	toxic air contaminants
VMT	vehicle miles traveled

1.0 INTRODUCTION

1.1 Project Brief

The project applicants, Reynolds & Brown and Jones Development, propose the development of approximately 1,070,000 square feet (sf) of new warehousing/fulfillment and manufacturing buildings, including ancillary office uses, on an approximately 58-acre portion of the former Pilkington float glass facility. The Pilkington site is presently developed with approximately 882,000 square feet of industrial structures associated with the former glass manufacturing facility on the western approximately 64 acres of the site. The project site is located south of Louise Avenue between Harlan Road and Howland Road in Lathrop, California.

The site is currently accessed at the signalized intersection of Cambridge Drive and Louise Avenue. Two new facility access points would be constructed and an existing rail spur would be relocated and provide service to the project site and the existing Pilkington facilities. Proposed facilities would be provided with new water, wastewater and storm drainage services by the City of Lathrop; the on-site portion of some of these systems would be operated in conjunction with existing Pilkington facilities. An existing trailer storage facility along Louise Avenue would be retained, and an exhaust stack, silos, and other remnants of the former glass manufacturing facility would be removed in conjunction with the project. It is the various city actions required to permit construction of the new industrial buildings and site improvements that are subject to environmental review under CEQA and reported in this document. These and other elements of the project are discussed in more detail in Chapter 2.0.

1.2 Project Background

The 122-acre project site is the location of the former Libby-Owens-Ford (LOF) Pilkington North America float glass manufacturing facility. The facility, constructed by LOF in 1961, was acquired by Pilkington in the 1980s and then by NSG in 2006. Faced with high costs of equipment replacement and pollution control, the facility permanently ceased operations in 2013. Following the closure, the site was acquired by the applicants. Existing furnaces and some other industrial structures were demolished and removed. Remaining glass and other waste materials were removed from the site and portions of the site graded in preparation for development of new industrial uses. The property was leased to the Kraft Heinz Company in 2016 for product storage, and portions of the site are currently leased to Tesla for vehicle storage.

The project site is zoned and entitled for ongoing industrial use of the existing facilities. Existing development consists of one large industrial building (779,794 sf) in the west-central portion of the site with two smaller buildings (22,630 and 39,280 sf respectively) to the south. A main power substation, stormwater pump station, and sewage treatment plant that serve existing development are located near the southwest corner of the site together with water storage reservoir Approximately five acres are in use for truck/trailer parking Louise Avenue, west of Cambridge Road. Railroad spurs traverse the site; spurs originate at the UPRR located east of Howland Road. Other existing development includes utility lines, wells, paved and gravel parking areas, lighting structures and landscaped areas. Continued use of these existing buildings and future modification and/or replacement of these buildings are considered separate from the proposed project and exempt from CEQA and not a subject of this environmental review. Changes, additions or

improvements to existing industrial facilities will be subject to City review under plans and ordinances of the City of Lathrop, and subject to the California Environmental Quality Act (CEQA) as determined by the city.

1.3 Purpose of Initial Study

The California Environmental Quality Act (CEQA) requires that public agencies document and consider the potential environmental effects of the agency's actions that meet CEQA's definition of a "project." Briefly summarized, a "project" is an action that has the potential to result in direct or indirect physical changes in the environment. A project includes the agency's direct activities as well as activities that involve public agency approvals or funding. Guidelines for an agency's implementation of CEQA are found in the "CEQA Guidelines" (Title 14, Chapter 3 of the California Code of Regulations).

Provided that a project is not exempt from CEQA, the first step in the agency's consideration of its potential environmental effects is the preparation of an Initial Study. The purpose of an Initial Study is to determine whether the project would involve "significant" environmental effects as defined by CEQA and to describe feasible mitigation measures that would avoid significant effects or reduce them to a less than significant level. In the event that the Initial Study does not identify significant effects, or identifies mitigation measures that would reduce all of the significant effects of the project to a less than significant level, the agency prepares a Negative Declaration. If this is not the case – that is, if the project would involve significant effects that cannot be readily mitigated - the agency must prepare an Environmental Impact Report (EIR). The agency may also decide to proceed directly with the preparation of an EIR without preparation of an Initial Study.

The proposed North Crossroads Business Center facility is a "project" as defined by CEQA and is not exempt from CEQA consideration. The City of Lathrop determined that the project involves the potential for significant environmental effects and required preparation of this Initial Study. The Initial Study describes the proposed project and describes its environmental setting; it discusses the potential environmental effects of the project and identifies feasible mitigation measures that would reduce the potentially significant environmental effects of the project to a less than significant level. The Initial Study considers the project's potential for significant environmental effects in the following subject areas:

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

The Initial Study concludes that the project would have significant environmental effects, but that all of these effects would be reduced to a less than significant level with the incorporation of recommended mitigation measures. As a result, the City has prepared a Mitigated Negative Declaration and notified the public of the City's intent to adopt the Initial Study/Mitigated Negative

Declaration. As of the distribution of the Initial Study/Mitigated Negative Declaration (IS/MND) for public review, the applicant has accepted all of the recommended mitigation measures. The time available for comment on the IS/MND is shown in the Notice of Intent.

1.4 Environmental Evaluation Checklist Terminology

The project's potential environmental effects are evaluated in the CEQA Environmental Evaluation Checklist and associated narrative shown in Chapter 3.0. The checklist includes a list of environmental considerations against which the project is evaluated. For each question, the City determines whether the project would involve: 1) No Impact, 2) a Less Than Significant Impact, 3) a Less Than Significant Impact With Mitigation Incorporated, or 4) a Potentially Significant Impact.

> A Potentially Significant Impact occurs when there is substantial evidence that the project would involve a substantial adverse change to the physical environment, i.e., that the environmental effect may be significant, and mitigation measures have not been defined that would reduce the impact to a less than significant level. If there are one or more Potentially Significant Impact entries in the Initial Study, an EIR is required.
>
> A Less Than Significant Impact occurs when the project would involve effects on a particular resource, but the project would not involve a substantial adverse change to the physical environment, and no mitigation measures are required.
>
> An environmental effect that is Less Than Significant With Mitigation Incorporated is a Potentially Significant Impact that can be avoided or reduced to a less than significant level with the application of mitigation measures.
>
> A determination of No Impact is self-explanatory.

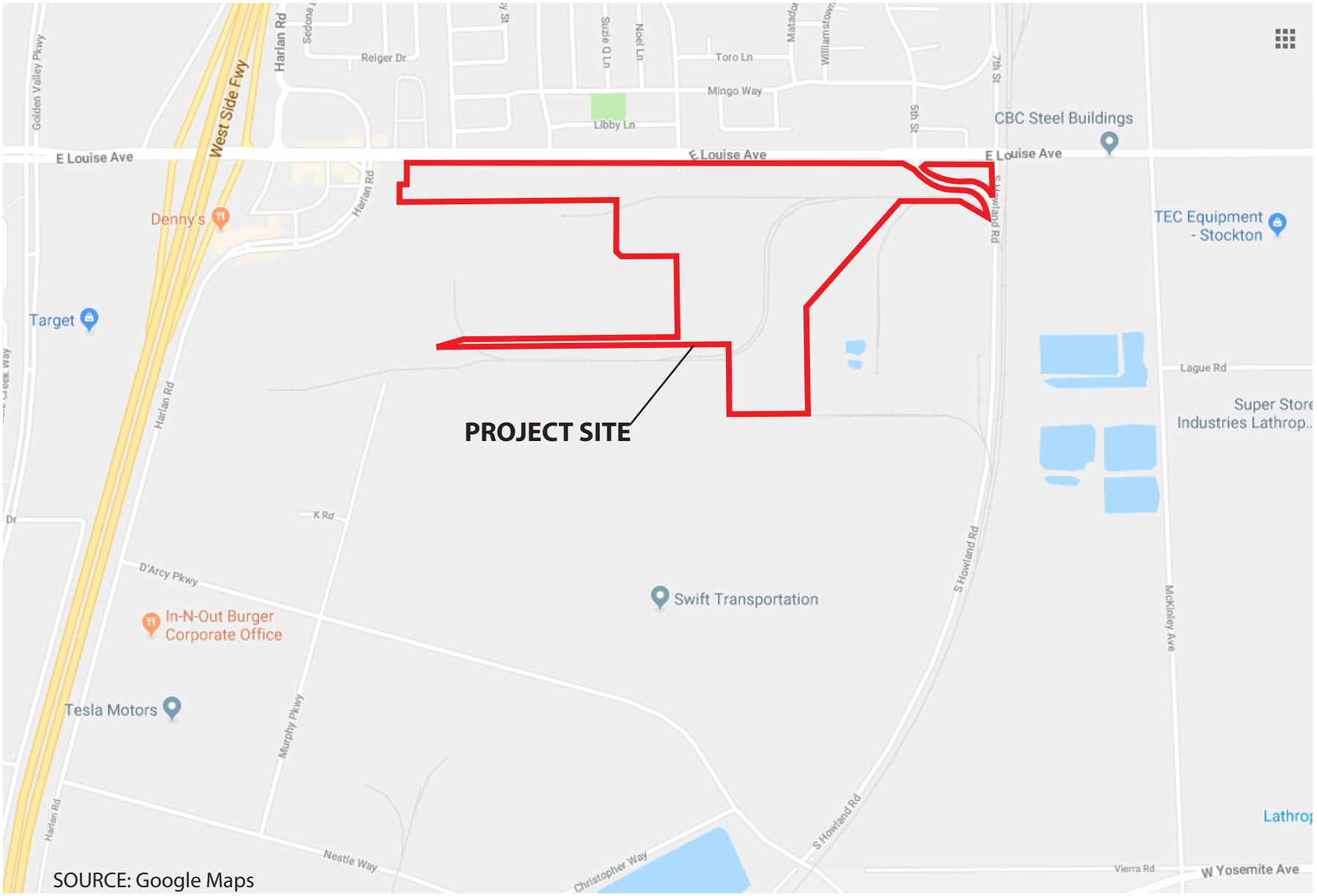
This IS/MND prescribes mitigation measures for the potentially significant environmental effects of the project.

1.5 Summary of Environmental Effects and Mitigation Measures

The following pages contain Table 1-1, Summary of Impacts and Mitigation Measures. The table summarizes the results of the analysis described in the Environmental Checklist Form and associated narrative discussion in Chapter 3.0.

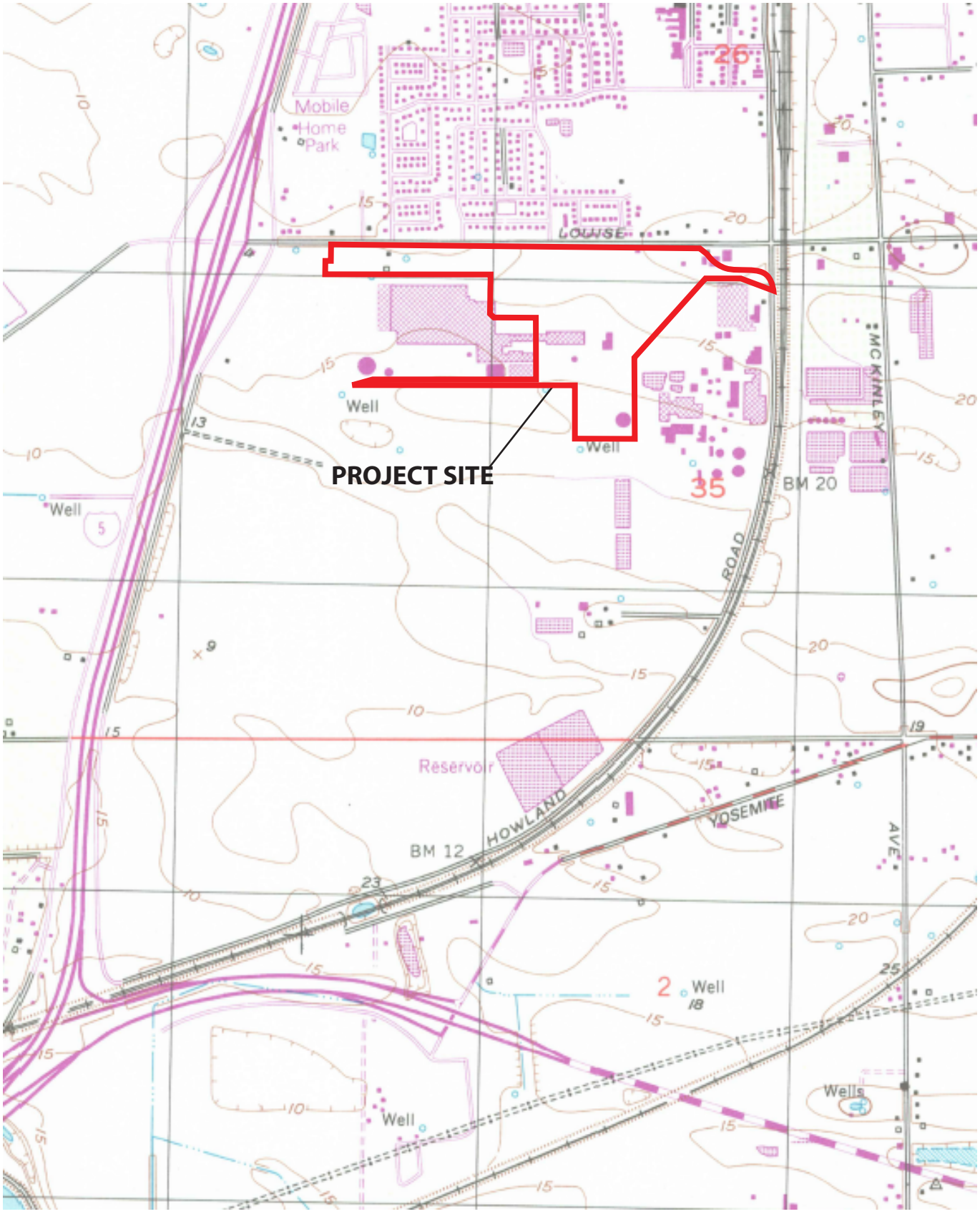
The potential environmental impacts of the proposed project are summarized in the left-most column of this table. The level of significance of each impact is indicated in the second column. Mitigation measures proposed to minimize significant effects, if needed, are shown in the third column, and the significance of the impact, after mitigation measures are applied, is shown in the fourth column.

Figure 1-1
REGIONAL LOCATION MAP



BaseCamp Environmental

Figure 1-2
STREET MAP



SOURCE: Geological Survey Map, Lathrop Quadrangle 7.5 Minute Series

Figure 1-3
USGS MAP

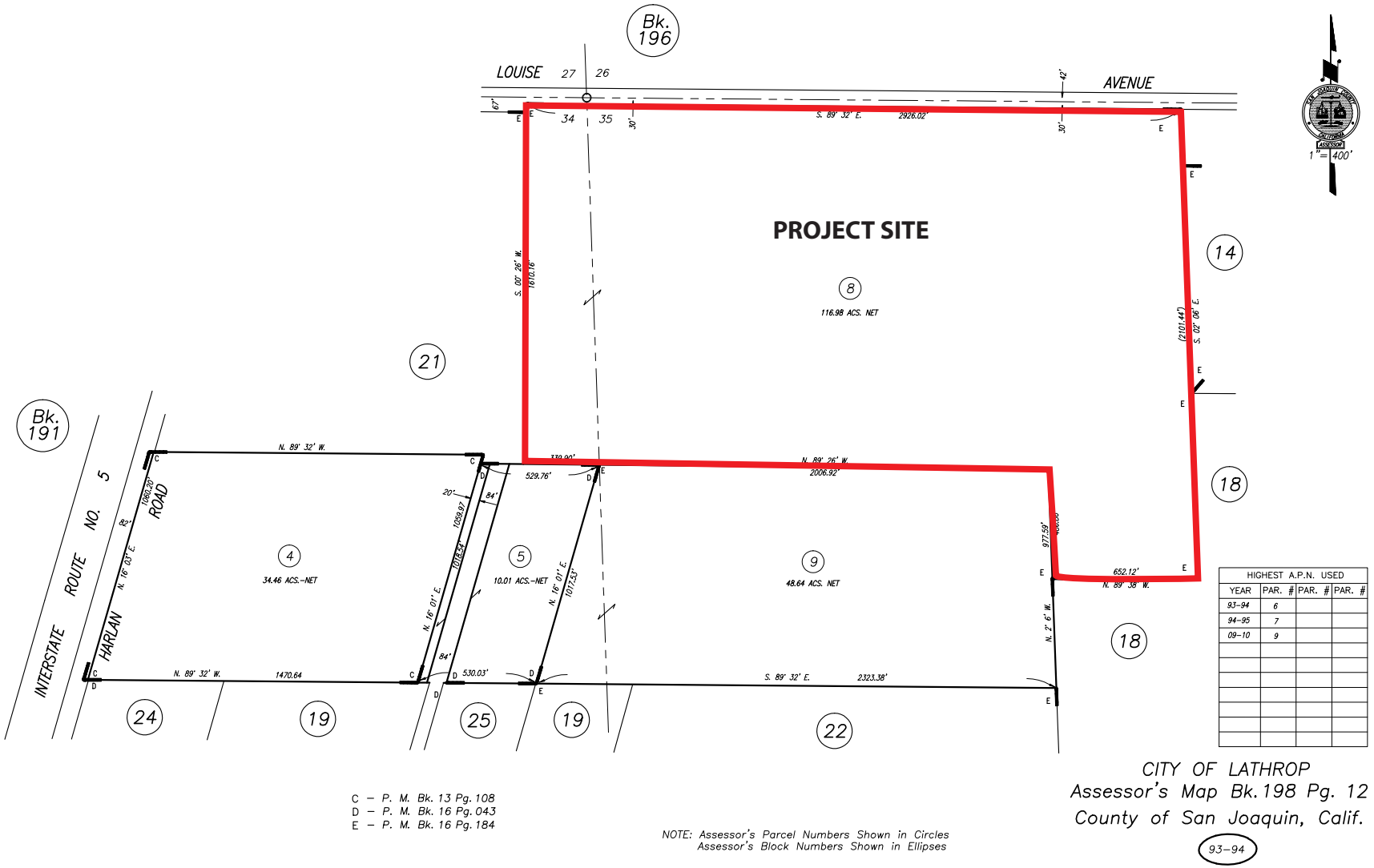


Figure 1-4A
ASSESSOR PARCEL MAP (WEST SECTION)

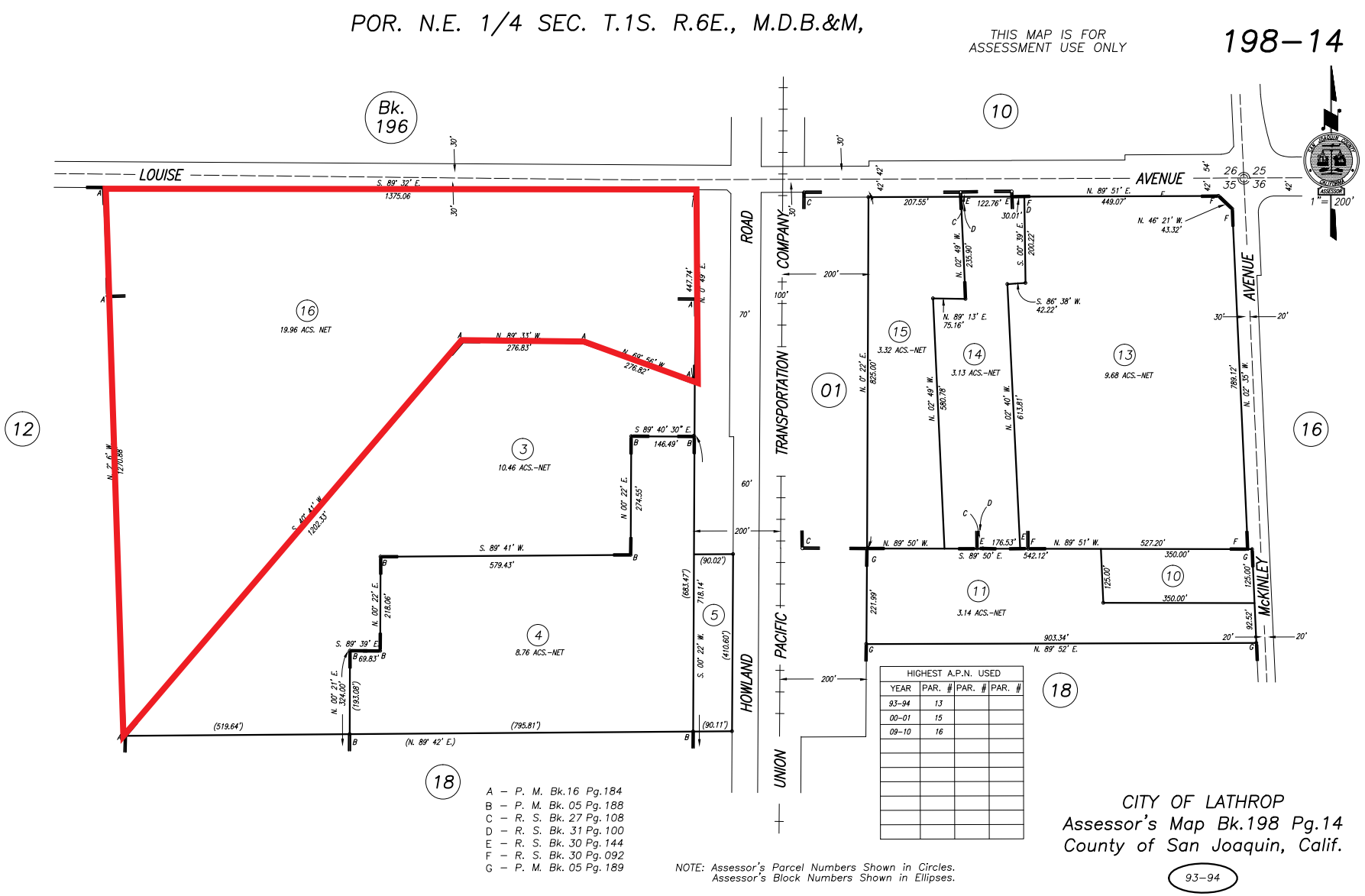
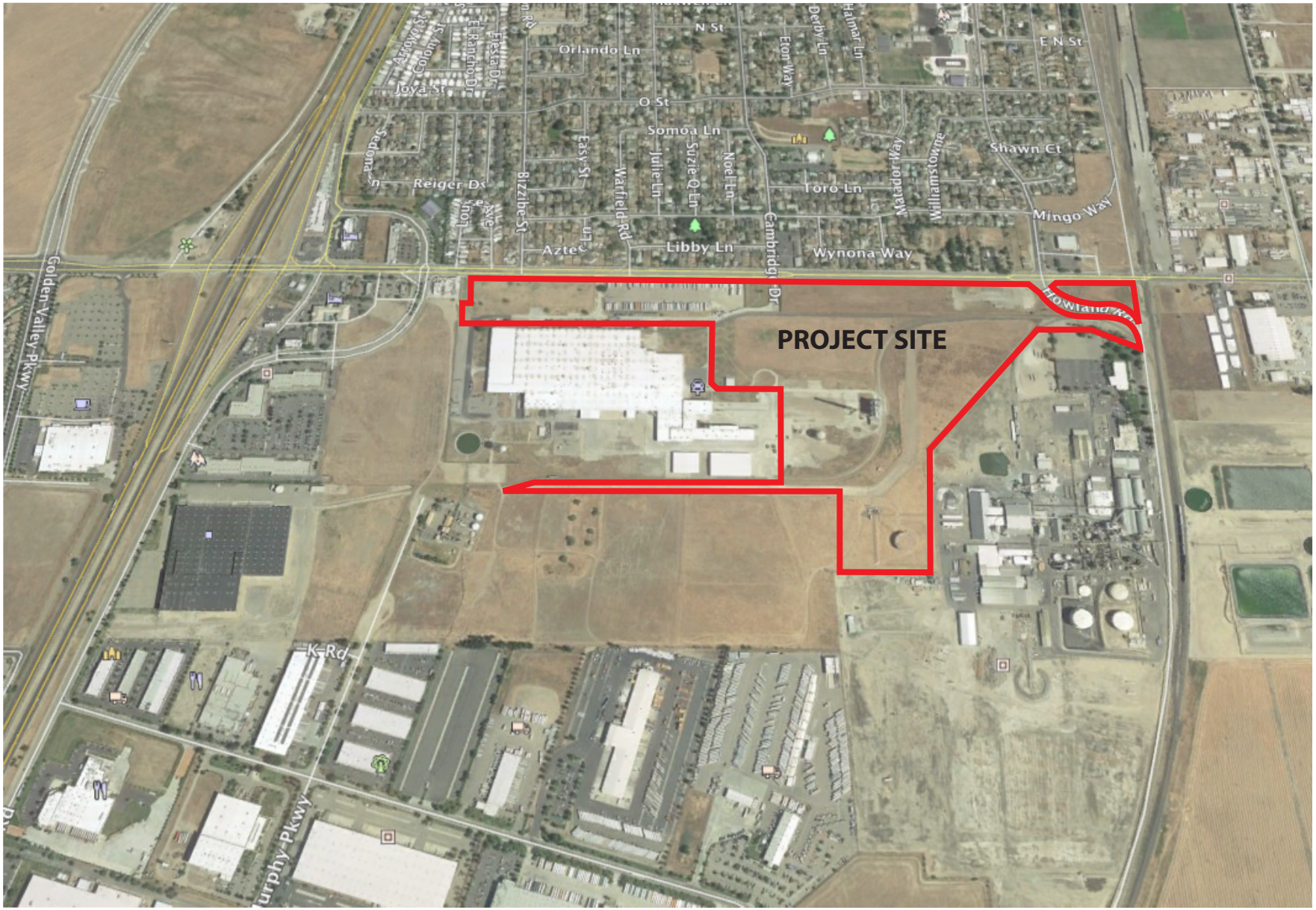


Figure 1-4B
ASSESSOR PARCEL MAP (EAST SECTION)



SOURCE: Google Earth

BaseCamp Environmental

Figure 1-5
AERIAL PHOTO

TABLE 1-1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Potential Impact	Significance Before Mitigation Measures	Mitigation Measures	Significance After Mitigation Measures
3.1 AESTHETICS			
a) Effects on Scenic Vistas	NI	None required	
b) Effects on Scenic Routes and Resources	LS	None required	
c) Effects on the Visual Character or Quality	LS	None required	
d) Light and Glare	LS	None required	
3.2 AGRICULTURE AND FORESTRY RESOURCES			
a) Agricultural Land Conversion	NI	None required	
b) Zoning and Williamson Act	NI	None required	
c, d) Timberland and Forest Land Conversion and Zoning	NI	None required	
e) Indirect Conversion of Farmland and Forest Land	NI	None required	
3.3 AIR QUALITY			
a) Air Quality Plan Consistency	LS	None required	
b) Violation of Air Quality Standards	LS	None required	
c) Cumulative Emissions	LS	None required	
d) Exposure of Sensitive Receptors	LS	None required	
e) Odors	LS	None required	
3.4 BIOLOGICAL RESOURCES			
a) Effects on Special-Status Species	PS	BIO-1: The developer shall mitigate for the proportionate loss of potential wildlife habitat from the project site by applying for coverage and implementing Incidental Take Minimization Measures (ITMMs) as required by the adopted San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP).	LS
b) Riparian and Other Sensitive Habitats	NI	None required	
c) Wetlands	NI	None required	
d) Fish and Wildlife Movement	PS	BIO-2: In the event trees need to be removed or trimmed to facilitate the project, they should be felled or trimmed outside of the general bird nesting season (February 1 through August 31). If not, the developer shall have a nesting bird survey conducted immediately prior to tree trimming or removal. If active nests are found, tree felling or trimming shall be delayed until the young have fledged.	LS

LEGEND: NI = No Impact; LS = Less than Significant; PS = Potentially Significant

TABLE 1-1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Potential Impact	Significance Before Mitigation Measures	Mitigation Measures	Significance After Mitigation Measures
e) Local Biological Requirements	NI	None required	
f) Conflict with Habitat Conservation Plans	NI	None required	
3.5 CULTURAL RESOURCES			
a) Historical Resources	NI	None required	
b) Archaeological Resources	PS	TCR-1; TCR-2; TCR-3	LS
c) Paleontological Resources	PS	CULT-1: All construction personnel shall receive brief "tailgate" training by a qualified archaeologist in the identification of paleontological resources, buried cultural resources, including human remains, and protocol for notification should such resources be discovered during construction work. CULT-2: If any subsurface historical or paleontological resources are encountered during construction of the project, all construction activities in the vicinity of the encounter shall be halted until a qualified archaeologist, or paleontologist as appropriate, can examine these materials, make a determination of their significance and, if significant, recommend further measures that would reduce potential effects to a less than significant level, consistent with the requirements of CEQA. The Lathrop CDD shall be notified in the event of a discovery, and the ODS shall be responsible for retaining qualified professionals, implementing recommended mitigation measures and documenting mitigation efforts in written reports to the CDD, consistent with the requirements of the CEQA Guidelines.	LS
d) Human Burials	PS	TCR-1; TCR-2; TCR-3	LS
3.6 GEOLOGY AND SOILS			
a-i) Fault Rupture Hazards	NI	None required	
a-ii, iii) Seismic Hazards and Liquefaction	PS	GEO-1: The City of Lathrop shall review and approve a site-specific, design-level geotechnical study for the project, if appropriate the study completed for the site by Berloger, Stevens & Associates, prior to issuing a grading and building permit. All geotechnical engineering and design recommendations included in the approved study shall be implemented during project design and prior to construction.	LS
a-iv) Landslides	NI	None required	
b) Soil Erosion	PS	GEO-2: Prior to issuance of a grading permit, the project contractor shall submit, for the review and approval of the Public Works Department, an erosion control plan that complies with the City's Storm Water Development Standards and utilizes Best Management Practices (BMPs) to limit the erosion effects during construction of the proposed project. Measures could include, but are not limited to: • Hydro-seeding • Placement of erosion control measures within drainage ways and ahead of drop inlets; • The temporary lining (during construction activities) of drop inlets with "filter	LS

LEGEND: NI = No Impact; LS = Less than Significant; PS = Potentially Significant

TABLE 1-1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Potential Impact	Significance Before Mitigation Measures	Mitigation Measures	Significance After Mitigation Measures
		fabric" (a specific type of geotextile fabric); • The placement of straw wattles along slope contours and back-of-curb prior to installation of landscaping; • Directing subcontractors to a single designated "wash out" location (as opposed to allowing them to wash-out in any location they desire); • The use of siltation fences; and • The use of sediment basins and dust palliatives.	
c) Geologic Instability	NI	None required	
d) Expansive Soils	LS	None required	
e) Adequacy of Soils for Sewage Disposal	NI	None required	
3.7 GREENHOUSE GAS EMISSIONS			
a) Significance of GHG Emissions	LS	None required	
b) Consistency with GHG Reduction Plans	PS	GHG-1: The ODS shall, in cooperation with the City, SJVAPCD and SJCOG, prepare and implement a Transportation Demand Management (TDM) Plan for the project that includes consideration of preferential vanpool and carpool parking spaces, on-site amenities that encourage alternative transportation modes such as locker and shower secure bicycle parking, on-site services that reduce mid-day trips, telecommuting options and provision of information regarding these and other trip-reducing measures available to employees. The plan shall be subject to City review and approval prior to issuance of the first building permit for building construction in the project area.	LS
3.8 HAZARDS AND HAZARDOUS MATERIALS			
a, b) Transport, Use, Disposal or Release	PS	HAZ-1: Demolition of existing above-ground structures shall be conducted in accordance with a City demolition permit and applicable conditions. Demolition procedures, safety requirements and environmental protections shall be defined in a demolition plan prepared by the applicant and subject to the approval of the Building Official and City Engineer. The demolition plan shall define the required qualifications of demolition contractors. Preparation of the demolition plan shall include testing as required to define potential environmental hazards and mitigation needed during demolition to protect worker and public health and safety. The demolition plan shall identify waste materials to be produced and their disposition. HAZ-2: Prior to grading activities, the ODS or its contractor shall retain a qualified professional to collect and analyze soil samples as required to determine whether pesticide residues or other contaminants are present and, if present, whether they pose a health risk to construction workers or an environmental contamination risk. If so, the ODS shall prepare and implement a risk reduction plan that will reduce risk to construction workers.	LS

LEGEND: NI = No Impact; LS = Less than Significant; PS = Potentially Significant

TABLE 1-1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Potential Impact	Significance Before Mitigation Measures	Mitigation Measures	Significance After Mitigation Measures
c) Hazardous Materials Use or Emissions Near Schools	NI		
d) Hazardous Materials Sites	PS	HAZ-3: Planned industrial development in the vicinity of existing hazardous waste cleanup monitoring wells shall be restricted as required to permit the continuing inspection, maintenance and operation of groundwater extraction equipment until the operation is closed by the agency with jurisdiction	LS
e, f) Aircraft Operations Effects	NI		
g) Emergency Response Effects	NI		
h) Wildland Fire Hazards	LS		
3.9 HYDROLOGY AND WATER QUALITY			
a, f) Water Quality Standards and Discharge Requirements	PS	HYDRO-1: The ODS shall prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) for the project in accordance with the Construction General Permit. The developer shall incorporate an Erosion Control Plan consistent with all applicable provisions of the SWPPP within the site development plans. The SWPPP shall be available on the construction site at all times. The developer shall file a Notice of Intent (NOI) with the State Water Resources Control Board prior to commencement of construction activity, and shall submit the SWRCB Waste Discharger's Identification Number (WDID) to the City prior to approval of development or grading plans. HYDRO-2: The ODS shall obtain an MS4 permit from the City which would describe post-construction BMPs required to reduce pollutant loads in stormwater discharges to acceptable levels, including compliance with the adopted Multi-Agency Post-Construction Stormwater Standards Manual and the City's Storm Water Development Standards.	LS
b) Groundwater Supplies	LS	None required	
c, d, e) Drainage, Erosion, and Runoff	PS	HYDRO-1; HYDRO-2	LS
g, h) Housing/Structures within Flood Hazard Areas	NI	None required	
i) Dam Failure Hazards	LS	None required	
j) Seiche, Tsunami and Mudflow	NI	None required	
3.10 LAND USE AND PLANNING			
a) Division of Established Communities	NI	None required	
b) Consistency with Land Use Plans and Zoning	NI	None required	
c) Conflict with Habitat Conservation Plan	NI	None required	
3.11 MINERAL RESOURCES			

LEGEND: NI = No Impact; LS = Less than Significant; PS = Potentially Significant

TABLE 1-1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Potential Impact	Significance Before Mitigation Measures	Mitigation Measures	Significance After Mitigation Measures
a, b) Availability of Mineral Resources	NI	None required	
3.12 NOISE			
a) Exposure to Noise Levels in Excess of Standards	LS	None required	
b) Exposure to Ground borne Vibrations	LS	None required	
c) Permanent Increase in Ambient Noise	LS	None required	
d) Temporary or Periodic Increase in Ambient Noise	LS	None required	
e, f) Aircraft Operations Noise	NI	None required	
3.13 POPULATION AND HOUSING			
a) Population Growth Inducement	LS	None required	
b, c) Displacement of Housing and People	NI	None required	
3.14 PUBLIC SERVICES			
a) Fire Protection	LS	None required	
b) Police Protection	LS	None required	
c) Schools	LS	None required	
d, e) Parks and Other Public Facilities	LS	None required	
3.15 RECREATION			
a, b) Recreational Facilities	LS	None required	
3.16 TRANSPORTATION/TRAFFIC			
a) Consistency with Applicable Plans, Ordinances and Policies	LS	None required	
b) Conflict With Congestion Management Program	NI	None required	
c) Impact on Air Traffic Patterns	NI	None required	
d) Traffic Hazards	PS		
e) Emergency Access	NI	None required	
f) Conflict with Non-vehicular Transportation Plans	LS	None required	

LEGEND: NI = No Impact; LS = Less than Significant; PS = Potentially Significant

TABLE 1-1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Potential Impact	Significance Before Mitigation Measures	Mitigation Measures	Significance After Mitigation Measures
3.17 TRIBAL CULTURAL RESOURCES			
a, b) Listed or eligible Historical Resources	PS	TCR-1: If the project site is determined to be a sensitive tribal cultural resource, the ODS shall consult with the affected tribe to establish and implement a procedure for monitoring and reporting all earth-moving and grading activities. TCR-2: In the event that construction encounters evidence of human burial or scattered human remains, construction in the vicinity of the encounter shall be immediately halted. The ODS shall immediately notify the County Coroner, the Lathrop Community Development Department, and the tribal representative. The ODS will be responsible for compliance with the requirements of CEQA as to human remains as defined in CEQA Guidelines Section 15064.5, with California Health and Safety Code Section 7050.5, and as directed by the County Coroner. If the human remains are determined to be Native American, the County Coroner shall notify the Native American Heritage Commission (NAHC), and the NAHC will notify and appoint a Most Likely Descendant. The Most Likely Descendant will work with the archaeologist to decide the proper treatment of the human remains and any associated funerary objects. TCR-3: In the event that other archaeological resources are encountered during project construction, all construction activities in the vicinity of the encounter shall be halted until a qualified archaeologist and tribal representative can examine the materials and make a determination of their "uniqueness" as defined by CEQA. If the resource is determined to be unique, the archaeologist shall recommend avoidance, minimization or mitigation measures that will reduce potential effects to a less than significant level. The ODS will be responsible for retaining the archaeologist and tribal representative and for implementing the recommendations of the archaeologist, including submittal of a written report to the Lathrop Community Development Department and tribal representative documenting the find and its treatment.	LS
3.18 UTILITIES			
a, e) Wastewater Treatment Requirements and Capacity	PS	UTIL-1: Prior to the issuance of building permits, the ODS shall quantify the need for Individual Sewer Units (ISUs) related to the permit to satisfaction of the City Public Works Department. The project applicant shall purchase additional ISUs as required to provide adequate capacity for the proposed project, subject to the review and approval of the Public Works Department and City Council.	LS
b, d) Water Systems and Supply	LS	None required	
c) New Stormwater Systems	NI	None required	
f, g) Solid Waste Effects	LS	None required	
3.19 MANDATORY FINDINGS OF SIGNIFICANCE			
a) Findings on Biological and Cultural Resources	PS	Mitigation measures described in Sections 3.4 and 3.5 and 3.17 above	LS
b) Findings on Individually Limited but Cumulatively Considerable Impacts	LS	None required	

LEGEND: NI = No Impact; LS = Less than Significant; PS = Potentially Significant

TABLE 1-1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Potential Impact	Significance Before Mitigation Measures	Mitigation Measures	Significance After Mitigation Measures
c) Findings on Adverse Effects on Human Beings	LS	None required	

LEGEND: NI = No Impact; LS = Less than Significant; PS = Potentially Significant

2.0 PROJECT DESCRIPTION

2.1 Project Brief

The project applicants, Reynolds & Brown, propose the development of approximately 1,070,000 sf of new warehousing/fulfillment and manufacturing buildings, including ancillary office uses, on an approximately 58-acre portion of the former Pilkington float glass facility. The LOF Pilkington site is presently developed with approximately 882,000 sf of industrial structures associated with the former glass manufacturing facility on the western approximately 64 acres of the site. The project site is located south of Louise Avenue between Harlan Road and Howland Road in Lathrop, California.

The site is currently accessed at the signalized intersection of Cambridge Drive and Louise Avenue. Two new facility access points would be constructed and an existing rail spur would be relocated and provide service to the project site and the existing LOF Pilkington facilities. Proposed facilities would be provided with new water, wastewater and storm drainage services by the City of Lathrop; the on-site portion of some of these systems would be operated in conjunction with existing LOF Pilkington facilities. An existing trailer storage facility along Louise Avenue would be retained, and an exhaust stack, silos, and other remnants of the former glass manufacturing facility would be removed in conjunction with the project. It is the various city actions required to permit construction of the new industrial buildings and site improvements that are subject to environmental review under CEQA and reported in this document. These and other elements of the project are discussed in more detail in Chapter 2.0.

2.2 Project Location

The proposed project is located in the central portion of the City of Lathrop in San Joaquin County. The property site is immediately south of Louise Avenue between Harlan Road and South Howland Road, and west of the Union Pacific Railroad (UPPR) (Figure 1-2). The entire project consists of two parcels, the first parcel address is 500 E. Louise Avenue (APN 198-120-08) and contains the existing industrial building. The second address is 1300 E. Louise Avenue (APN 198-140-16) (Figures 1-4A and 1-4B) which is between Cambridge Drive and Howland Road. This site is within Section 25, Township 1 South, Range 6 East, as shown on the USGS Lathrop, California, 7.5-minute quadrangle map (Figure 1-3).

2.3 Project Objectives

The general objective of the project is to continue development of an existing industrial site. The project site, formerly the LOF Pilkington float glass manufacturing facility. The LOF Pilkington facility ceased operation in 2013. Furnaces and other related facilities have been demolished, debris and waste material have been removed, and the remaining facilities on the site have been in various industrial uses since that time, most recently by Kraft Heinz as of 2016. Additional detail on the history and existing land uses on the site is described in Section 1.3 Project Background and Section 3.10 Land Use and Planning.

The specific objectives of the project involve the development of the undeveloped portions of the site for lease and/or sale; including subdivision, installation of access, parking and utility improvements; and

construction of approximately 1.0 million square feet of industrial space and facilities to accommodate various industrial, warehouse, and distribution activities. The applicant indicates that the project would respond to the demand for warehouse/fulfillment facilities and manufacturing space driven primarily by the site's location as a logistics hub on a major arterial roadway, adjacent to major freeways, rail, and port facilities. The project would also provide employment and economic opportunities.

2.4 Project Details

The proposed project that is subject to environmental review under CEQA consists of the actions required to develop the undeveloped portions of the project site (Figure 2-2). The ongoing occupation and use of the existing structures on the site is not a subject of this environmental review. Further discussion of this concern is provided in Section 1.2 Project Background.

Option 1

Option 1 proposes the construction of seven buildings totally approximately 1,068,362 sf. The railroad track in the northeastern portion of the project site would be abandoned and the tracks removed. The northern track would remain. (Figure 2-3)

Option 2

Option 2 proposes the construction of six buildings totally 1,023,580 sf. Option 2 would also abandon and remove the tracks in the northeastern portion of the buildings as well as the tracks to the north. (Figure 2-4)

Entitlements

The proposed project will require City approval of a series of entitlements, all of which are considered and the environmental impacts of which are addressed in this Initial Study. These entitlements include a Tentative Parcel Map and Site Plan Review for elements of the project proposed for near-term construction.

Tentative Parcel Map

The proposed Tentative Parcel Map (Figure 2-5) would subdivide the "designated remainder" parcel into 11 industrial parcels for future development. Details of the parcels are provided below.

Parcel	Acres	Use
1	1.69	Truck Trailer Parking
2	1.69	Truck Trailer Parking
3	5.05	New Industrial Development
4	24.52	New Industrial Development
5	7.48	New Industrial Development
6	10.53	New Industrial Development
7	2.81	New Industrial Development
8	2.76	New Industrial Development
9	1.69	Truck Trailer Parking
10	1.17	Unspecified
11	10.19	Detention Basin

Site Plan Review

The City of Lathrop Community Development Department will require a Site Plan Review for the development of the proposed industrial buildings, extension of utilities, and site improvements including vehicle and truck parking, landscaping, lighting, and fencing. The purpose of the City's Site Plan Review is to ensure that development plans comply with all applicable City development ordinances, standards, and policies.

2.4.1 Industrial Buildings

The project applicant proposes to construct industrial facilities on the project site. For purposes of this analysis, it is assumed that the facilities would be utilized for various industrial, manufacturing, and distribution uses. The project would consist of eight buildings that would total approximately 1,070,000 sf in floor area. Most of the floor area would be used for warehousing and distribution of goods, with the exception of approximately 50,000 sf which would be set aside for office space, tentatively located at the southwest and southeast corners of each of the buildings. The size of each building and their associated uses are described in the table below. Figure 2-1 shows the layout of the proposed buildings.

Table 2-1: Proposed Building Area (square feet)

Option 1				
Building	Site Area (total square feet)	Manufacturing	Warehouse	Office
2	102,060	24,265	72,795	5,000
3	85,320	18,830	56,490	10,000
4	533,520	130,880	392,640	10,000
5	85,320	18,830	56,490	10,000
6	144,692	34,923	104,769	5,000
7	59,400	40,800	13,600	5,000
8	58,050	13,263	39,788	5,000
Total	1,068,362	254,591	763,772	50,000
Option 2				
2	102,060	24,265	72,795	5,000
3	659,330	162,333	486,998	10,000
4	124,740	29,935	89,805	5,000
5	20,000	4,375	13,125	2,500
6	59,400	13,600	40,800	5,000
7	58,050	13,263	39,788	5,000
Total	1,023,580	247,770	743,310	32,500

Source: Ware Malcomb 2018

2.4.2 Circulation

The site is to be primarily accessed from three points. The existing signalized intersection of Louise Avenue and Cambridge Avenue provides entry and exit to the site and will require the construction of acceleration and deceleration lanes. The Louise Avenue frontage would also be improved with curbs, gutters, landscaping, and a pedestrian sidewalk. Secondary access points, approximately 50 feet in width, are proposed at the existing driveway along Louise Avenue at the former visitor/employee entrance (west of the truck trailer parking area), and an access point just east of Cambridge Avenue along Louise Avenue. The existing 5.07-acre truck trailer parking area along Louise Avenue would be retained. The proposed driveways would accommodate truck traffic and provide access to dock bays and truck/trailer parking areas.

The project would provide a total of 1,074 9' x 20' standard parking stalls for passenger cars and approximately 246 12' x 55' trailer parking stalls. A total of 83 van/carpool stalls and 43 bicycle parking stalls would be provided. All parking would be consistent with the City of Lathrop's parking regulations.

2.4.3 Site Modifications and Improvements

The proposed project would require improvements to the existing stormwater drainage system and stormwater pump station located in the southwestern portion of the site. The project would require the construction of several new storm drain inlets, gutters and curbs, and two new storm drainage pipelines. The pipelines would be constructed near the existing stormwater pump station and collect and convey runoff and drainage from the new buildings to the proposed 10-acre detention basin bordering the southern portion of the project site. Figure 2-6 shows the proposed drainage system, which would retain all stormwater runoff on the project site. The basin would be approximately eight feet deep, with sides constructed at a 2:1 slope and a bottom approximately 97 feet wide. All runoff collected in the detention basin would infiltrate into the ground.

A new sanitary sewer treatment pump would be constructed on the northwest side of the existing industrial building which would serve the proposed buildings in the northeast portion of the project site. The sanitary sewer pump would connect to a new 10-inch wastewater sewer main along the western side of the industrial building which would convey wastewater to the existing on-site sewage treatment facility in the southwest portion of the project. The pipeline would extend south to the property boundary and connect with the City's sewer system. The existing sewage treatment plant pumps would be used to pump wastewater to the public sewer.

Under Option 1, the existing tracks along the northern portion of the project site would remain. The tracks serving the northeast corner of the existing building would be abandoned and the track removed, similar to Option 2.

Under Option 2, the existing rail spur on the eastern portion of the project would be relocated to the east along the current property boundary with the JR Simplot Company to provide service to other portions of the project site. The existing rail would be utilized as much as possible during the relocation process. A new switch would be added below proposed building three and a new rail spur brought to the southeast corner of the existing building. Relocating the rail would accommodate additional rail cars for loading and unloading. After the new switch is added, the northern spur serving the northeast corner of the existing building would be abandoned and the tracks removed. All rail construction and removal would be completed under the supervision of a railroad engineering company and in accordance with the directives of the UPRR.

All areas disturbed during project construction would be mulched or re-seeded with grasses. A variety of trees and shrubs would be planted throughout the project site. Screening trees would be placed in front of the truck/trailer parking area, near the driveway entrances, and around the proposed buildings, and a 10-foot wide landscaping corridor would surround the entire project site. Landscaping would be selected based on suitability for the local climate, site conditions, and reduced water needs. All landscape elements would be installed according to the project's Landscape Plan and the City of Lathrop's Landscape Standards for Planting and Irrigation.

The project would implement a Lighting and Photometric Plan that would be consistent with California's 2016 Building Energy Efficiency Standards, Title 24, Part 6, which includes lighting controls such as the use of LED light fixtures, time switches, and motion sensors for all exterior lighting. Pole mounted light fixtures would be appropriately angled to minimize light exposure. Details regarding project lighting are provided in Chapter 3.1.

2.4.4 Demolition

The project would require demolition of a 275-foot above grade stack, silos, 500,000-gallon steel water tank, and steel diesel storage tank. A Demolition Permit would be obtained prior to project approval and all demolition activities would be performed by highly specialized contractors. All operations, whether abatement or demolition, would be kept constantly wet to eliminate air born dust. These demolition activities would improve air borne debris and dust control, and reduce safety risks compared to the use of a wrecking ball or explosives.

All concrete, brick, and steel would be recycled as much as possible. Foundations for these structures would be demolished below grade to a depth specified by a third-party soils engineer. The deepest portion of the foundations would likely be left in place at a depth that would not adversely affect new construction or have any effect on groundwater.

Prior to the start of demolition work, all structures would be surveyed for hazardous material by a third-party consultant that specializes in this work. If any hazardous materials are found, the materials would be abated following all appropriate procedures and under the supervision of the third party hazardous materials specialist. The Central Valley Air Quality Control Board and San Joaquin County Environmental Health Department would be notified as required prior to the start of any abatement or demolition. A City Demolition Permit would also be required and submitted for approval.

2.5 Project Construction

The project site contains remnants from previous industrial and manufacturing uses such as old electrical lines, fencing, scrap metal, asphalt and concrete which are no longer in use. All of these structures would be removed in conjunction with project development and prior to construction. Project construction would include activities such as excavating, grading, steel framing, masonry, installation of infrastructure, paving of parking areas, and landscaping. Types of construction equipment anticipated to be used at the site include dozers, backhoes, elevators, forklifts, cranes, haul trucks, and graders. The City of Lathrop prohibits construction work within 500 feet of residential areas between 10:00 pm and 7:00 am weekdays, or between 11:00 pm and 9:00 am Fridays, Saturdays, and legal holidays. All construction work would occur outside of these hours.

The proposed project is intended to be constructed in phases, although those phases are not defined at present. Phases of development would be packaged for construction approval in accordance with market conditions. Development phases would include one or more of the proposed industrial buildings as shown on the site plan alternatives together with access, circulation, and utility improvements needed to serve the subject building(s). It is anticipated that the earliest phases of the project will need to include construction of backbone wastewater and storm drainage lines and all or portions of the proposed detention basin. Each proposed building or phase will be subject to further City review for its conformance with the overall site, utility, landscaping and other plans that are undergoing City review and approval at this time.

2.6 Permits and Approvals

Implementation of the proposed project would require the following discretionary actions by the City of Lathrop:

- Approval of a Site Plan Review for the proposed warehousing/manufacturing buildings;

- Approval of a Tentative Parcel map to subdivide the "designated remainder" parcel and create 11 new parcels; and
- Approval and adoption of the Initial Study/Mitigated Negative Declaration and adoption of the Mitigation Monitoring and Reporting Plan

SCHEME 1

Perspective View

PILKINGTON INDUSTRIAL
LATHROP, CA

WARE MALCOMB

SNR17-0079-00
10.27.2017

SHEET
1

This conceptual design is based upon a preliminary review of entitlement requirements and on unverified and possibly incomplete site and/or building information, and is intended merely to assist in exploring how the project might be developed.

Figure 2-1
ARCHITECTURAL RENDERING

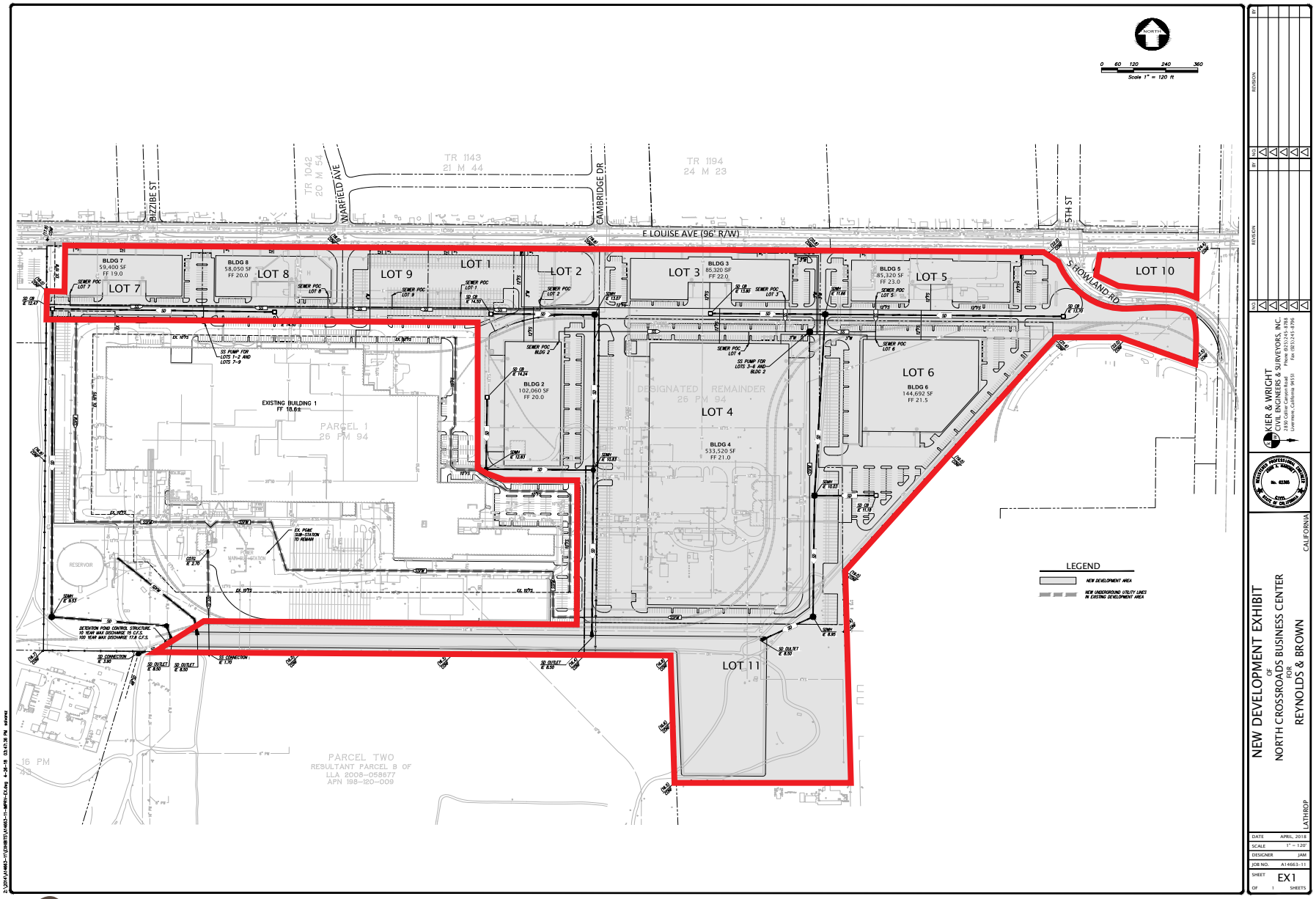
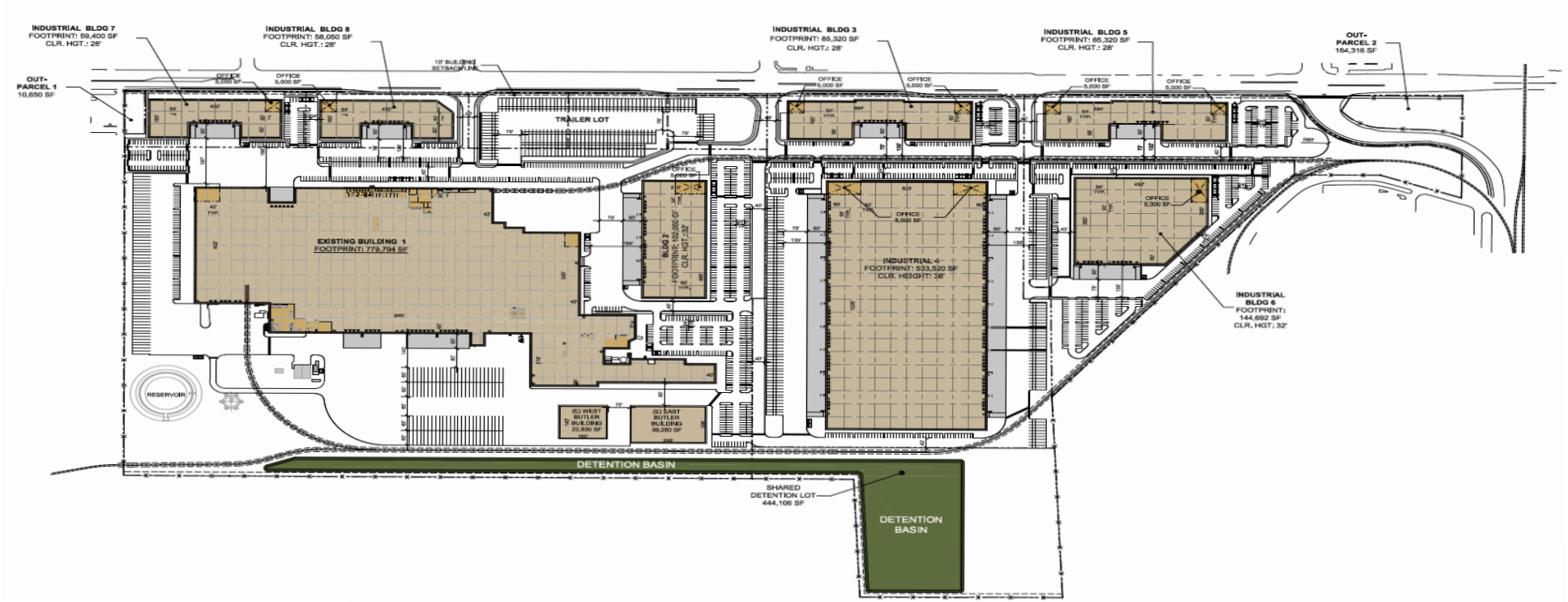
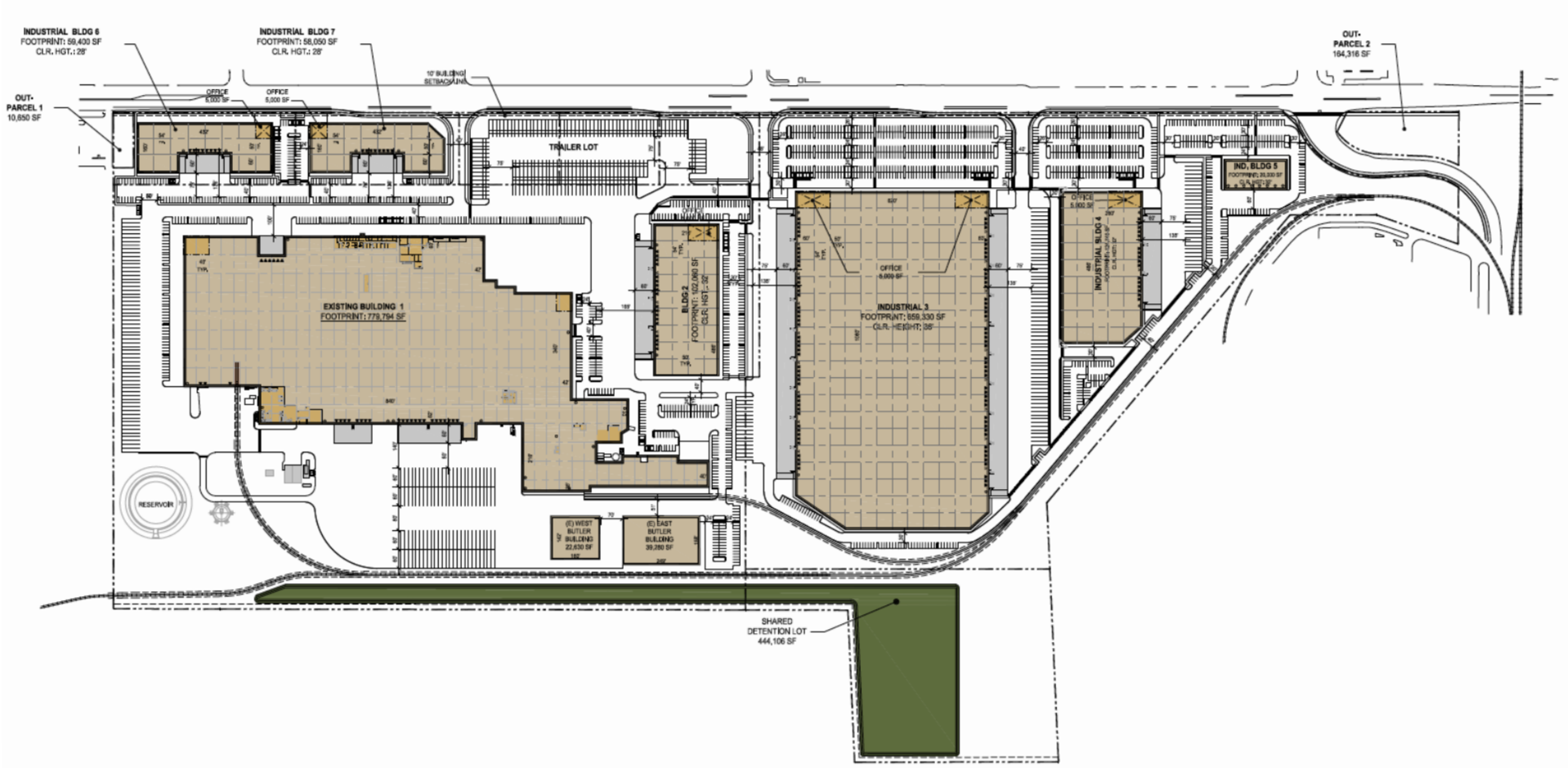


Figure 2-2
PROPOSED NEW DEVELOPMENT AREA



BaseCamp Environmental

Figure 2-3
SITE PLAN, OPTION 1



BaseCamp Environmental

Figure 2-4
SITE PLAN, OPTION 2

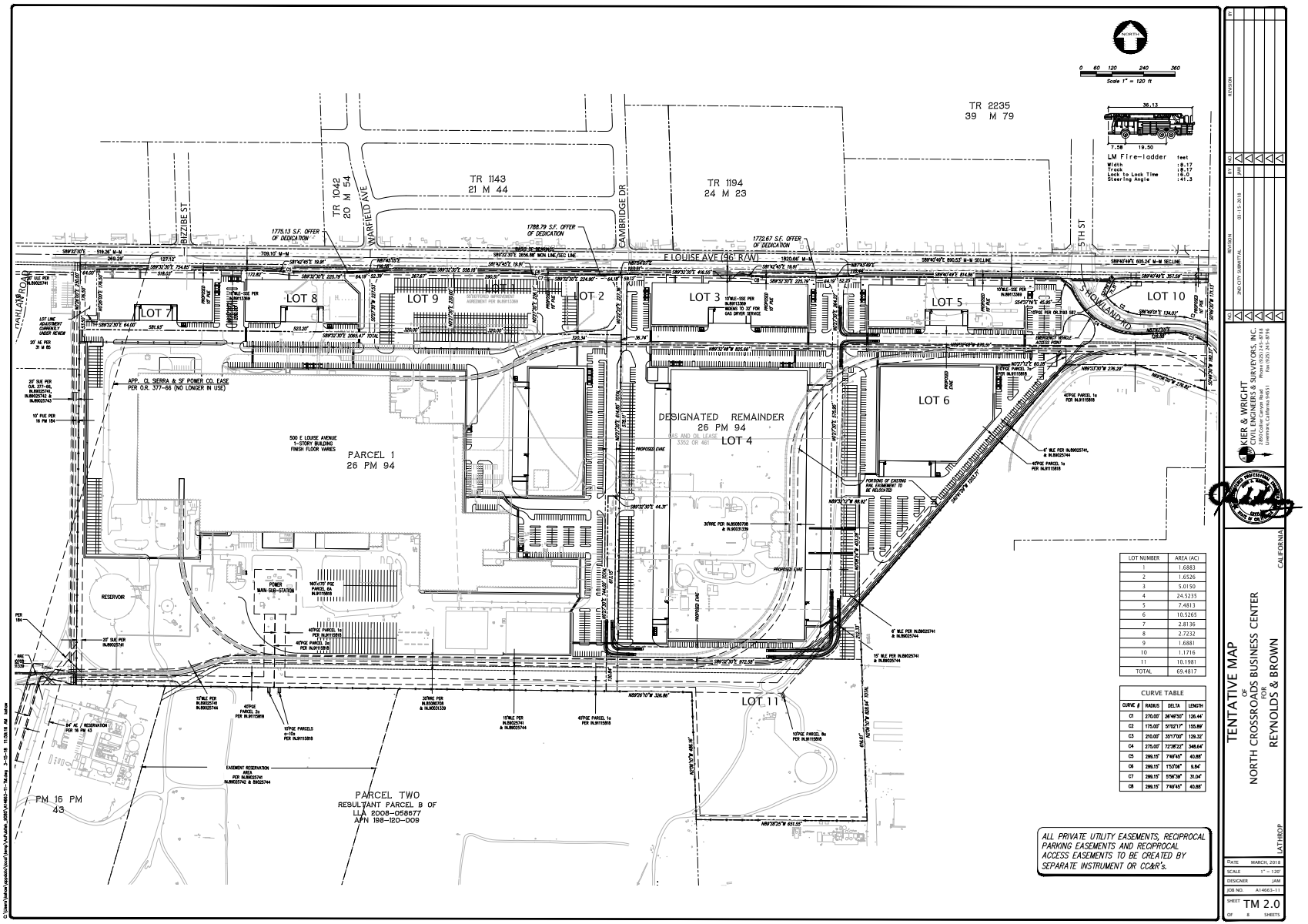


Figure 2-5
TENTATIVE SUBDIVISION MAP

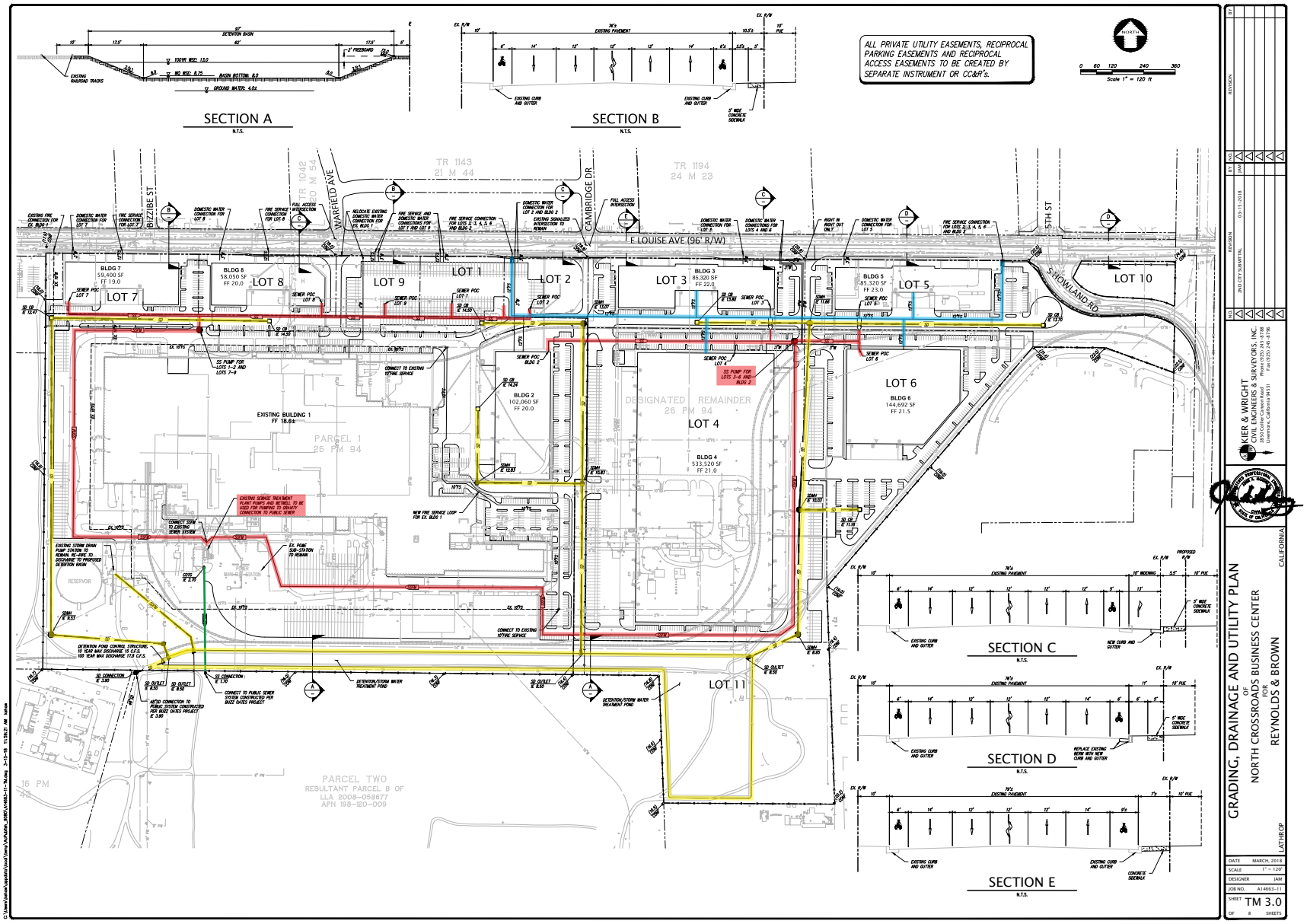


Figure 2-6
UTILITY PLAN, (COLOR ENHANCED)

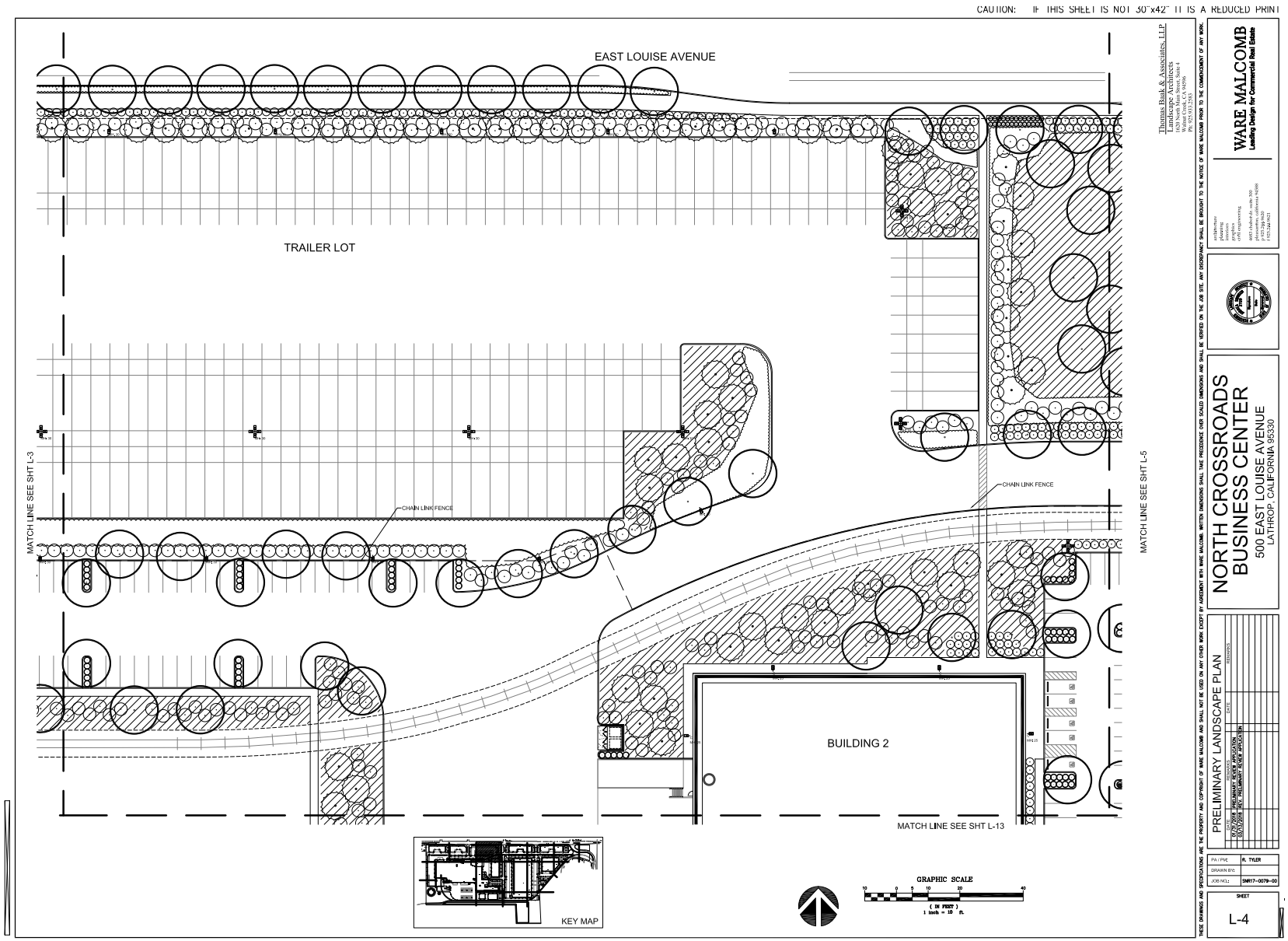


Figure 2-7

TYPICAL LANDSCAPING PLAN (TRAILER LOT AREA, LOUISE AVENUE)

3.0 ENVIRONMENTAL CHECKLIST FORM

3.1 AESTHETICS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?				√
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			√	
c) Substantially degrade the existing visual character or quality of the site and its surroundings?			√	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			√	

NARRATIVE DISCUSSION

Environmental Setting

Aesthetic or visual resources are the natural, cultural, and human-created features of the landscape. Existing views, shading, nighttime illumination, and glare are all related elements in the visual environment. Aesthetic impacts can include the loss of or damage to scenic resources or the introduction of contrasting visual features in the landscape that degrade the aesthetic character or quality of the existing landscape.

The proposed project is located in an urban area that has largely been developed for industrial, commercial, and residential uses. Existing visual features in the project area include Interstate 5 and arterial and collector roads, the San Joaquin River, residential houses, large commercial and industrial buildings, industrial equipment, remnant agricultural fields, county and community parks, areas of open space and vacant land, railroad tracks, transmission lines, and communication towers. The topography is flat. There are not any federal, state, county, or city designated scenic vistas or scenic areas located in the project region.

The California Department of Transportation (CalTrans) designates portions of the state highway system as state scenic highways for the protection and enhancement of California's scenic beauty. Based on review of CalTrans Scenic Mapping System and the Lathrop General Plan, there are no state designated scenic highways located near the project area.

Visual features of the project site are similar to those in the surrounding areas. The prominent visual features include a 779,794 sf single story industrial building (Building 1) which is set back approximately 400 feet from Louise Avenue. A five-acre truck/trailer parking lot is located along the Louise Avenue frontage. A 275-foot above grade exhaust stack, a 500,000-gallon water tank, and three silos are located in the eastern portion of the site. Two single story warehouse buildings, a treatment reservoir, and small electrical substation are located to the south. Other features include open grassland, vacant land, landscaping trees near the industrial building, paved parking areas, internal access roads, railroad tracks, and various other small industrial structures. The topography of the site does not contain any notable topographic features.

Views refer to visual access, distance area, and obstruction, or whether a focal point or panoramic view is available from an area. Motorists, bicyclists, and pedestrians traveling east and west along Louise Avenue would have temporary views of the project site. The site would only be visible for a few seconds as motorists pass by or while stopped at the Louise/Cambridge signalized intersection. Temporary views also come from the residential neighborhood along Louise Avenue immediately north of the project site. Residents have views of the project site when they are entering and exiting the neighborhood at the Louise/Cambridge Road intersection; Louise/Warfield Road intersection; and the Louise/Bizzibe Street intersection. Dominant foreground views from the Bizzibe intersection would consist of open grass areas, scattered landscaping trees, and the front of the existing industrial building. Views from Warfield Road would consist of the existing truck/trailer parking lot. Foreground views from the Cambridge intersection would include the driveway entrance to the facility and open grassy areas. Direct permanent views of the project site from the homes located directly along Louise Avenue are blocked by an existing block wall.

The City's General Plan includes several standards and guidelines for the preservation and protection of aesthetic resources that must be considered during the siting, construction, and design of industrial and commercial facilities. The industrial development standard pertaining to preservation of aesthetics states that "Because of often prominent visibility, industrial sites should be subject to the same standards for visual screening with ornamental walls, screen fencing and landscaping and street trees, frontage landscaping and parking lot landscaping" (City of Lathrop 2004). The following industrial design policy in the General Plan also applies to the preservation of aesthetics. "Industrial proposals should be located where possible within an industrial park designed for the accommodation of a community of industries that are compatible in terms of operational characteristics, aesthetic qualities, utility service requirements and street circulation" (City of Lathrop 2004). The City's building codes and building design standards, and landscaping standards, outline specific requirements for on and off-site improvements involving architecture and landscaping that includes the use of shrubs, trees, grass, and decorative masonry walls to reduce aesthetic impacts.

The project site is located in the vicinity of existing urban development in the City of Lathrop, and the night horizon in the area is dominated by sky glow from existing lighting in the urban area. The primary existing sources of night lighting in the project area are pole mounted street and pedestrian lights, traffic signals, and parking area lighting and signage in adjoining commercial and industrial areas. Existing light sources on the project site include exterior building and security lighting around the industrial building, and pole mounted access and parking lot lighting. There are ten existing pole mounted lighting fixtures at a spacing of approximately 125 feet in the truck/trailer parking lot and approximately 13 pole mounted street lighting fixtures are located along the Louise Avenue frontage. Similar light sources are located on the adjacent commercial and industrial properties to the east and west of the project site.

Environmental Impacts and Mitigation Measures

a) Scenic Vistas

The project site is located in an existing industrial and commercial area surrounded by urban development. The project site and surrounding areas do not have access to any scenic vistas and therefore, the project would not result in any impacts.

b) Scenic Resources

The project is located in an existing industrial and commercial area and does not contain any state or county designated scenic highways or roads, and does not contain any notable scenic resources or landscape features such as waterways, rock outcroppings, unique architectural structures, or historic sites. Visual features of the proposed project such as industrial and manufacturing buildings, interior roads and parking areas, sidewalks, and landscaping trees and shrubs would generally be consistent with existing scenic resources on the site and in the general industrial setting of the area.

The project site contains scattered trees in front of the existing industrial facility but they are not a significant visual feature in the landscape. The project's proposed Landscape Plan would improve scenic resources in the area with the planting of trees, shrubs, grasses, and ground cover as described below. The project would be required to comply with all City aesthetic-related policies and goals and building design standards. The project would not result in adverse effects on scenic resources.

c) Visual Character and Quality

The existing project site does not contain any landscape features of significant visual character or quality. The removal of the stack, silos, and water tank would represent a change in existing views. Views of the buildings proposed on the eastern portion of the site would represent a change from existing vacant land to new manufacturing and industrial buildings. Driveways and parking areas would not represent a change to the existing visual quality of the landscape. The height and size of the proposed buildings would be similar to those in the surrounding area. Mitigation measures and implementation of the project's Landscape Plan would involve the planting of medium and large canopy trees, screen trees, ground cover, and entry accent trees, shrubs, and grasses (Figure 2-7). Large trees planted along the Louise Avenue frontage and the driveway entrances to the facility would improve views from Louise Avenue. The proposed industrial buildings would be constructed at a maximum height of 76 feet to minimize visual intrusions and building design and paint colors would be chosen to blend with existing buildings in the area. All areas disturbed during construction would be mulched or re-seeded with grasses. A variety of trees and shrubs would be planted throughout the project site. Screening trees would be placed in front of the truck/trailer parking area along Louise Avenue and a 10-foot wide landscaping corridor would surround the entire project site. All landscape elements would be installed according to the City of Lathrop's Landscape Standards for Planting and Irrigation. Implementation of the Landscape Plan would improve the visual character and quality of the landscape and project site on approximately 26 acres. The project would also comply with the City's General Plan goal of achieving visual and functional quality in new development. All new structures and site improvements will be designed and constructed to meet the aesthetic standards of the City as directed in its Design Review process and adopted City design standards. As a result, project impacts on visual character and quality would be considered less than significant.

d) Light and Glare

Lighting impacts are evaluated in terms of the Project's change in ambient lighting conditions and proximity to light sensitive land uses such as residential areas and school sites. Development of the site would involve an increase in night lighting in the project area, and some limited potential for glare. Potential lighting effects would be associated with new internal street and parking area lighting, lighting of the driveway entrances, and security lighting along buildings and sidewalks.

Lighting for all building parking areas would consist of LED fixtures on 25 and 30-foot poles oriented toward the interior of the site with an average illuminance of 3.14 to 5.51 Foot candles (Fc). Similar smaller systems would be wall-mounted around the building perimeters. The only lighting that would occur along the Louise Avenue frontage would be six LED pole mounted fixtures near the facility entrance between Warfield Avenue and Cambridge Road. Specifications for the proposed lighting systems and resulting lighting levels throughout the project site, including lighting levels at and immediately outside the project site will be developed for the project.

Lighting that occurs outside the project site boundary can be referred to as "spill" light. Predicted spill light levels along the Louise frontage would average approximately 3.5 Fc. Spill light levels would not be detected along the roadway and would be reduced with increased distance from the site.

Planned street, security and other lighting systems will be consistent with the proposed industrial and manufacturing uses, as well as with other existing urban development in the City of Lathrop. The addition of new lighting would not represent a change from the existing lighting in an urban setting. The amount and intensity of light emitted from the project site would be similar to the surrounding industrial and commercial sites. Proposed safety and security lighting structures would be similar to what is currently on-site. All lighting structures would be designed to use the lowest wattage possible. All lights must be shielded to direct light and glare towards the ground. Building setbacks and placing shielding structures on light poles near Louise Avenue would reduce the intensity of lighting and potential for glare along the roadway. The nighttime views from Lathrop Villages and views from Louise Avenue would not be significantly affected. The project would implement a Lighting Plan that would be consistent with California's 2016 Building Energy Efficiency Standards, Title 24, Part 6, which includes lighting controls such as the use of LED light fixtures, time switches, and motion sensors for all exterior lighting. Pole mounted light fixtures would be appropriately angled to minimize light exposure. A Photometric Plan would also be submitted to the City prior to the issuance of any construction permits. The Photometric Plan is designed to reduce both generation of exterior light and the potential for light to indirectly affect surrounding areas. Therefore, potential impacts from light and glare would be less than significant.

3.2 AGRICULTURE AND FORESTRY RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				√
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				√
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))?				√
d) Result in the loss of forest land or conversion of forest land to non-forest use?				√
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?				√

NARRATIVE DISCUSSION

Environmental Setting

The primary land use in San Joaquin County, including the unincorporated areas in the vicinity of the City of Lathrop, is agriculture. A time series of Google and San Joaquin County aerial photographs, demonstrate that the project site has not been developed as farmland or used for agricultural activities in recent history. The LOF Pilkington facilities were developed in the early 1960s. The project site currently includes an approximately 779,800 sf industrial building and two smaller industrial buildings in the west-central portion of the site. Remains of the former glass factory are located throughout the remainder of the site, including storage facilities, roadways, paved areas and other facilities. These southwest and eastern portions of the project site are, however, primarily vacant land.

There is no active farmland located adjacent to or near the project site. The entire site and all surrounding lands are located within the City of Lathrop. The primary use of the site and vicinity has been industrial. A large vacant parcel located immediately south of the site is currently under development for industrial purposes. Remaining undeveloped lands in the vicinity are previously developed for industrial use or vacant lands planned for eventual industrial development. Vacant

lands on and near the site have been used for grazing of goats, presumably for the purpose of weed control as opposed to commercial agriculture.

The Important Farmland Maps, prepared by the California Department of Conservation as part of the Farmland Mapping and Monitoring Program (FMMP), designate areas of land that have potential for farmland use, based on physical and chemical soil properties as well as land use. The maps categorize farmland in decreasing order of importance, as "Prime Farmland", "Farmland of Statewide Importance", "Unique Farmland", and "Farmland of Local Importance". Lands are also designated as "Grazing Land", "Urban and Built-up Land", and "Other Land" The entire project site is currently designated as Urban and Built-up Land. Urban and Built Up Land is described as having a building density of at least one unit per 1.5 acres, or approximately 6 structures to a 10-acre parcel (California Farmland Mapping and Monitoring Program 2014). These lands are not considered of any agricultural importance.

The Williamson Act allows state and local governments to enter into contracts with private landowners to preserve farmland by offering property tax breaks to landowners who keep their land in agricultural use. The project site does not contain land under a Williamson Act contract.

Environmental Impacts and Mitigation Measures

a) Agricultural Land Conversion

The project site is designated as Urban and Built-up Land according to the California Department of Conservation (FMMP) as are all of the areas adjacent to the project site. As a result, the project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Since there are no agricultural lands in the vicinity of the site, the project would have no effect on the conversion of other agricultural lands to non-agricultural purposes. Therefore, the project would have no impact in this area of concern.

b) Zoning and Williamson Act

Neither the project site nor any of the surrounding lands are designated or zoned for agricultural use. As described in Section 3.10 Land Use, the project site and surrounding lands are designated and zoned for industrial use. As a result, the project would not affect lands designated or zoned for agricultural use.

The project site does not contain lands under a Williamson Act contract, and none of the surrounding lands are subject to Williamson Act contracts. Therefore, the project would have no effect on Williamson Act contracts.

c, d, e) Timberland and Forest Land Conversion and Zoning

The project site does not include any forestry resources as defined in Public Resources Code (PRC) 12220(g), timberland, (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)). The project would not involve any conversion of forest land to other uses; the project would have no impact on land used or zoned for forestry or timber harvest.

The Lathrop General Plan designates the existing project site as General Industrial. The project would require the construction and operation of industrial facilities which would be consistent with

the existing City of Lathrop General Industrial land use designation as well as the existing zoning of the site. Therefore, the project would not require rezoning.

The project would not encroach on farmland, be located adjacent to or near farmland or result in changes that would encourage the conversion of existing farmland to non-agricultural uses. Forest lands are not located on, or adjacent to the project site and would not result in the indirect conversion of forest land.

3.3 AIR QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable Air Quality Attainment Plan?			√	
b) Violate any air quality standard or contribute to an existing or projected air quality violation?			√	
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)?			√	
d) Expose sensitive receptors to substantial pollutant concentrations?			√	
e) Create objectionable odors affecting a substantial number of people?			√	

NARRATIVE DISCUSSION

Environmental Setting

The project site is in the northern portion of the San Joaquin Valley Air Basin, which includes San Joaquin, Stanislaus, Merced, Fresno, Kings, and Tulare Counties, and the western portion of Kern County. The San Joaquin Valley Air Pollution Control District (SJVAPCD) is responsible for complying with federal and state air quality standards and has jurisdiction for developing and implementing air quality control measures in the Air Basin.

Under the federal Clean Air Act, the U.S. Environmental Protection Agency (EPA) has established primary and secondary ambient air quality standards for six criteria air pollutants: ozone, particulate matter, carbon monoxide, nitrogen dioxide, sulfur dioxide, and lead. Primary standards are established to protect public health, and secondary standards are developed to protect public

welfare, including reduced visibility and damage to animals, crops, vegetation, and buildings. The California Air Resource Board (ARB) has established ambient air quality standards that include the six federal criteria air pollutants plus four additional pollutants to further protect public health.

Table 3-1 lists both the federal and state attainment status for each of the criteria air pollutants within the San Joaquin Valley Air Basin. Except for ozone and particulate matter, which are discussed below, the Air Basin is in attainment of, or unclassified for, all federal and State ambient air quality standards.

Table 3-1
San Joaquin Valley Air Basin Attainment Status

Criteria Pollutant	Designation/Classification	
	Federal Primary Standards	State Standards
Ozone - One hour	No Federal Standard	Nonattainment/Severe
Ozone - Eight hour	Nonattainment/Extreme	Nonattainment
PM_{10}	Attainment	Nonattainment
$PM_{2.5}$	Nonattainment	Nonattainment
Carbon Monoxide (CO)	Attainment/Unclassified	Attainment/Unclassified
Nitrogen Dioxide (NO_x)	Attainment/Unclassified	Attainment
Sulfur Dioxide (SO_x)	Attainment/Unclassified	Attainment
Lead	No Designation/Classification	Attainment
Hydrogen Sulfide	No Federal Standard	Unclassified
Sulfates	No Federal Standard	Attainment
Visibility Reducing Particles	No Federal Standard	Unclassified
Vinyl Chloride	No Federal Standard	Attainment

Note: Federal primary standards are those designed to protect human health.
Source: SJVAPCD 2015a.

Air Pollutants of Concern

Ozone is not emitted into the atmosphere; instead, it is created by chemical reactions between nitrogen oxides (NOx) and reactive organic gases (ROG) in the presence of sunlight. The major sources of ozone include emissions from industrial facilities, electric utilities, motor vehicles, gasoline vapors, and chemical solvents. Ozone is a respiratory irritant that increases susceptibility to respiratory infections, and an oxidant that can cause substantial damage to vegetation and other materials.

The San Joaquin Valley Air Basin is currently designated as nonattainment for the 1-hour ozone state standard and nonattainment for both state and federal 8-hour ozone standards (see Table 3-1). The major source of ozone near the project site is motor vehicles traveling on major roadways surrounding the project site. The maximum 8-hour average ozone level in the SJVAB in 2016 was 0.103 ppm (California ARB, iADAM, 2016). The SJVAPCD has adopted a 2016 Ozone Plan for the 2008 8-Hour Ozone Standard and a 2013 Plan for the Revoked 1-Hour Ozone Standard for the Air Basin to attain federal ambient air quality standards for ozone.

Particulate matter is a mixture of solid and liquid particles suspended in air, such as dust, pollen, soot, smoke, and liquid droplets. Particulate matter is generated by a mix of rural and urban sources, including agricultural activities, industrial emissions, fugitive dust created by vehicle traffic, and secondary aerosols formed by reactions in the atmosphere. Health concerns associated with suspended particulate matter focus on those particles small enough to reach the lungs when inhaled; consequently, both the federal and state air quality standards for particulate matter apply to particulates 10 microns or less in diameter (PM_{10}) as well as to particulates less than 2.5 microns in diameter ($PM_{2.5}$), which are carried deeper into the lungs. Acute and chronic health effects associated with high particulate levels include the aggravation of chronic respiratory diseases, heart and lung disease, coughing, bronchitis, and respiratory illnesses in children.

The Air Basin is currently in attainment status for federal PM_{10} standards, but not for state standards, and the Air Basin is in nonattainment status for both federal and state $PM_{2.5}$ standards. The maximum 24-Hour Average $PM_{2.5}$ level in the SJVAB in 2016 was 66.4 g/m (California ARB, iADAM, 2016). The SJVAPCD has adopted the 2016 Moderate Area Plan for the 2012 PM2.5 Standard, the 2015 PM2.5 Plan for the 1997 federal PM2.5 standard, the 2012 PM2.5 Plan for the 2006 federal PM2.5 standard, and the 2007 PM10 Maintenance Plan to maintain the Air Basin's attainment status of the federal PM10 standard. The SJVAPCD is currently in the process of developing an attainment strategy to address 1997, 2006, and 2012 PM2.5 standards, as well as a plan to demonstrate maintenance of the 1987 PM10 standard as required under the federal Clean Air Act.

Carbon monoxide (CO) is an odorless, colorless gas that is highly toxic. It is formed by the incomplete combustion of fuels and is emitted directly into the air, unlike ozone. The main source of CO in the San Joaquin Valley is on-road motor vehicles. A State Implementation Plan for carbon monoxide has been adopted by the ARB for the entire state. The San Joaquin Valley Air Basin is in attainment/unclassified status for CO; as such, the SJVAPCD has no CO attainment plans. However, high CO concentrations in areas of limited geographic size, referred to as "hot spots," may occur in areas ordinarily associated with highly congested traffic.

In addition to the criteria pollutants, the ARB has identified other air pollutants as toxic air contaminants (TACs) - pollutants that may cause acute, serious, and/or long-term health effects, such as cancer, even at low levels. Diesel particulate matter is the most commonly identified TAC, generated mainly as a product of combustion in diesel engines. Other TACs are less common and are typically associated with industrial activities.

Air Quality Rules and Regulations

As previously noted, the SJVAPCD has jurisdiction over most air quality matters in the Air Basin. The SJVAPCD has developed plans to attain State and federal standards for ozone and particulate matter, which include emissions inventories to measure the sources of air pollutants and the use of computer modeling to estimate future levels of pollution and make sure that the Valley will meet air quality goals. The SJVAPCD implements the federal and California Clean Air Acts and the applicable attainment and maintenance plans through local rules and regulations. SJVAPCD rules and regulations that would be applicable to development projects similar to the proposed project are summarized below.

Regulation VIII (Fugitive Dust PM10 Prohibitions)

Rules 8011-8081 are designed to reduce PM10 emissions (predominantly dust/dirt) generated by human activity, including construction and demolition activities, road construction, bulk materials storage, paved and unpaved roads, carryout and track out, landfill operations, etc.

Rule 4101 (Visible Emissions)

This rule prohibits emissions of visible air contaminants to the atmosphere and applies to any source operation that emits or may emit air contaminants.

Rule 4102 (Nuisance)

This prohibits the discharge of such quantities of air contaminants or other materials "which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety of any such person or the public."

Rule 9410 (Employer-Based Trip Reduction)

Rule 9410 requires employers to prepare an Employer Trip Reduction Implementation Plan (ETRIP) for each worksite with 100 of more eligible employees. The ETRIP shall include a combination of strategies, set forth in Rule 9410, designed to reduce the number of vehicle miles traveled (VMT) by employees in private vehicles used to commute to and from the worksite. This rule applies to employers in the San Joaquin Valley Air Basin with at least 100 eligible employees at a worksite for at least 16 consecutive weeks during the employer's previous fiscal year, within specified areas.

Rule 9510 (Indirect Source Review)

Rule 9510, also known as the Indirect Source Rule (ISR), is intended to reduce or mitigate construction and operational emissions of NOx and PM_{10} generated by new development. This rule requires specific percentage reductions in estimated on-site construction and operation emissions, and/or payment of off-site mitigation fees for required reductions that cannot be met on the project site. Construction emissions of NOx and PM_{10} exhaust must be reduced by 20% and 45%, respectively. Operational emissions of NOx and PM_{10} must be reduced by 33.3% and 50%, respectively. Rule 9510 applies to light industrial development of minimum 25,000 square feet and to heavy industrial development of minimum 100,000 square feet.

Environmental Impacts and Mitigation Measures

In 2015, the SJVAPCD adopted a revised Guide for Assessing and Mitigating Air Quality Impacts (GAMAQI). GAMAQI defines an analysis methodology, thresholds of significance, and mitigation measures for the assessment of air quality impacts for projects within SJVAPCD's jurisdiction. Table 3-2 shows the CEQA thresholds for significance for pollutant emissions within the SJVAPCD. The significance thresholds apply to emissions from both project construction and project operations.

Table 3-2
Estimated Project Air Pollutant Emissions

Pollutant	SJVAPCD Significance Threshold	Maximum Annual Construction Emissions		Annual Operational Emissions	
		Project Emissions	Exceeds Threshold?	Project Emissions	Exceeds Threshold?
ROG	10	2.73	No	5.49	No
NO_x	10	3.80	No	7.29	No
CO	100	3.04	No	11.58	No
SO_x	27	<0.01	No	0.04	No
PM_{10}	15	0.69	No	2.98	No
$PM_{2.5}$	15	0.28	No	0.86	No

Notes: Significance thresholds apply to both construction and operational emissions. All figures are in tons per year.

Sources: California Emissions Estimator Model v. 2016.3.2; SJVAPCD 2015b.

The California Emissions Estimator Model (CalEEMod) was used to estimate both project construction emissions, assumed to occur during two calendar years, and annual operational emissions at completion and occupancy of the proposed project, assumed to occur in 2020. The CalEEMod results are shown in Appendix A of this document and in Table 3-2. It should be noted that the results in Table 3-2 are for unmitigated emissions; that is, emissions without implementation of laws and regulations with which projects must comply and without emission reduction measures typically employed for development projects. Also, the CalEEMod run was based on a higher total square footage than described in Section 2.0, Project Description, though the difference is less than 1 percent.

a, b) Air Quality Plans and Standards

As shown in Table 3-2, neither project construction nor operational emissions would exceed the significance thresholds for any of the criteria pollutants. Moreover, the emission data in Table 3-2 are for unmitigated emissions, so no measures to reduce or minimize emissions are required for the project to meet the significance thresholds.

Even though project emissions would be below significance thresholds, the project still would be required to comply with SJVAPCD Regulation VIII, which would reduce generation of particulate matter emissions, specifically dust, during project construction. Also, the project would likely be subject to SJVAPCD Rule 9510 and its reduction requirements for NOx and PM_{10}. Compliance with these SJVAPCD rules and regulations would further reduce the amount of project emissions, which are already considered less than significant.

The SJVAPCD has attainment plans for ozone and particulate matter. Since project emissions would not exceed the significance thresholds for these pollutants, the project would not interfere with the objectives of these attainment plans. Project impacts related to air quality plans would be less than significant.

c) Cumulative Emissions

As indicated in Table 3-2, project operations would generate pollutant emissions that would not exceed SJVAPCD significance thresholds. Because of this, the project is not expected to make a cumulatively considerable contribution of any criteria pollutant emissions, especially since vehicle traffic generated by the project development is expected to be more limited than for more typical residential projects. Project impacts would be less than significant.

d) Exposure of Sensitive Receptors

The land uses most sensitive to pollutant emissions generated by the project are the residences north of the project site, across Louise Avenue. Project construction may generate dust emissions that could reach residences nearest the construction site. Implementation of SJVAPCD Regulation VIII would reduce particulate matter emissions from construction activities, which as indicated in Table 3-2 would not be significant per the SJVAPCD significance thresholds. Substantial contributions of fugitive dust to this area would be unlikely due to the northwesterly prevailing wind.

The project proposes entryways off Louise Avenue, including an existing intersection with Cambridge Avenue. The main pollutant of concern associated with road intersections is carbon monoxide, which is typically associated with large volumes of traffic. The GAMAQI indicates that a project would create no violations of the CO standards if neither of the following criteria are met:

- A traffic study for the project indicates that the Level of Service (LOS) on one or more streets or at one or more intersections in the project vicinity will be reduced to LOS E or F; or
- A traffic study indicates that the project will substantially worsen an already existing LOS F on one or more streets or at one or more intersections in the project vicinity (See Section 3.16, Transportation/Traffic, for an explanation of LOS).

As discussed in Section 3.16, Transportation/Traffic, the project traffic study indicates that intersections potentially affected by the project are expected to operate at better than LOS E even with the addition of project traffic. The project is expected to have no adverse impact related to CO emissions at the project site or at project traffic study intersections.

Project construction would likely generate emissions of diesel particulate matter, which is considered a TAC. This would be of particular concern to the residential area adjacent to the north. As shown in Appendix A, PM exhaust emissions, which include diesel particulate matter, are small in total when compared with the SJVAPCD significance thresholds. Construction emissions of diesel particulate matter are temporary and would cease once project construction is completed. Diesel particulate emissions generated by project operations would amount to less than 160 pounds annually. This amount would be readily dissipated and would not lead to significant exposure by nearby residences. Impacts of diesel particulate matter emissions are considered less than significant. Substantial contributions of diesel PM to this area would be unlikely due to the northwesterly prevailing wind.

The demolition of the furnace stack and silos could generate substantial particulate matter emissions, both from the demolition activity and from residual and potentially hazardous contents within these facilities. As described in Section 2.0, Project Description, the stack and other facilities would be demolished using concrete "muncher," a high reach excavator or other specialized tools. It is anticipated that these operations would be kept constantly wet to minimize airborne dust. Prior

to the start of demolition work, these structures would be surveyed for hazardous materials, which if found would be abated. These procedures, encompassed by mitigation measures described in Section 3.8, would minimize potential impacts of demolition related to particulate matter and TACs. Overall, impacts related to exposure of sensitive receptors are considered less than significant.

e) Odors

The land uses most sensitive to potential odors generated by the project would be the residences north of the project site. It is anticipated that the project will involve primarily warehouse and distribution uses. Future industrial could also involve materials, products or processes resulting in odors; such uses would be regulated in accordance with future City review of building permits and improvement plans. As a result, the main source of odors associated with the project as proposed would be emissions from diesel trucks entering and leaving the site. Truck traffic would be of relatively low overall volume; these emissions would be readily dispersed and are unlikely to last for a significant length of time. Thus, odors from emissions that reach the residential area to the north would at most be sporadic and not noticeable after a short time.

Future industrial uses of the site are anticipated to within proposed buildings. These activities would occur mostly indoors and thus are unlikely to release odors into the immediate area. Moreover, SJVAPCD Rule 4102 limits discharges of air contaminants and other materials that can be considered nuisances, including odors. As a result, project impacts related to odors would be less than significant.

3.4 BIOLOGICAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Adversely impact, either directly or through habitat modifications, any endangered, rare, or threatened species, as listed in Title 14 of the California Code of Regulations (Sections 670.2 or 670.5) or in Title 50, Code of Federal Regulations (Sections 17.11 or 17.12)?		√		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?				√
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?				√

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	√		
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			√
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan?			√

NARRATIVE DISCUSSION

Environmental Setting

The project site was the subject of a biological assessment prepared by Moore Biological Consultants. A copy of the assessment report is shown in Appendix B. The body of the site consists of disturbed weedy grassland, areas that are paved or covered with gravel, and some old structures associated with prior industrial uses. Surrounding land uses in this portion of San Joaquin County are primarily industrial, commercial, and residential.

Due to the amount of disturbance from past agriculture, historical uses of the site, surrounding development, and periodic mowing and/or disking for weed abatement, vegetation in the project site is primarily annual grass and weed species. California annual grassland series (Sawyer and Keeler-Wolf, 1995) best describes the disturbed grassland vegetation. Appendix B, Table1 is a list of plant species observed in the site. The few trees in the site are primarily ornamental species. No locally important trees, such as native oaks, or blue elderberry (*Sambucus mexicana*) shrubs were observed within or adjacent to the project site.

A variety of bird species were observed during the field survey; all of these are common species found in industrial and commercial agricultural areas in San Joaquin County. These include red-tailed hawk, turkey vulture, American crow, mourning dove, northern mockingbird, yellow-billed magpie, western kingbird, western scrub jay, red-winged blackbird. There are trees in and near the site that are suitable for nesting raptors and other protected migratory birds, including Swainson's hawk. Given the presence of large trees and raptor foraging habitat (i.e., open fields) in and near the site, it is likely one or more pairs of raptors, plus a variety of songbirds, nest in trees in the site each year. It is also considered likely that songbirds nest within grassland habitats in the site each year.

A limited variety of mammals common to agricultural areas may occur in the project site, including black-tailed hare, desert cottontail, and California ground squirrels. Coyote, striped skunk, raccoon, and Virginia opossum would be expected to occur in the project site on occasion. A number of species of small rodents including mice and voles also likely occur. Due to lack of suitable habitat, few amphibians and reptiles are expected to use habitats in the site. More detailed lists of potentially-occurring species are provided in Appendix B.

The site was inspected for the presence of potentially jurisdictional Waters of the U.S. or wetlands, but none were observed in the site. Specifically, no vernal pools, seasonal wetlands, marshes, ponds, creeks, or lakes of any type were observed in the site.

Special-status species are plants and animals that are legally protected under the state and/or federal Endangered Species Act or other regulations. Special-status species also include other species that are considered rare enough by the scientific community and trustee agencies to warrant special consideration, particularly with regard to protection of isolated populations, nesting or denning locations, communal roosts, and other essential habitat.

The likelihood of occurrence of listed, candidate, and other special-status species in the site is generally low. Appendix B, Table 3 provides a summary of the listing status and habitat requirements of special-status species that have been documented in the greater project vicinity or for which there is potentially suitable habitat in the greater project vicinity. This table also includes an assessment of the likelihood of occurrence of each of these species in the site. The evaluation of the potential for occurrence of each species is based on the distribution of regional occurrences (if any), habitat suitability, and field observations.

A total of four special-status plant species have potential to occur on the site. These species generally occur in relatively undisturbed areas in vegetation communities such as vernal pools, marshes and swamps, seasonal wetlands, riparian scrub, and areas with unusual soils. The ruderal grasslands in the site are highly disturbed and do not provide suitable habitat for any of the plants listed in Table 3 of Appendix B, or other special-status plants. Due to lack of suitable habitat, no other special-status plant species are expected to occur in the site.

The potential for intensive use of habitats within the project site by special-status wildlife species is also generally low. Several special-status wildlife species have been recorded in greater project vicinity, including Swainson's hawk, burrowing owl, tricolored blackbird, Suisun song sparrow, loggerhead shrike, yellow-headed blackbird, riparian brush rabbit, California tiger salamander, Central Valley steelhead, longfin smelt and valley elderberry longhorn beetle. Several other species with potential to occur in the project vicinity are listed in Appendix B, Table 3.

While the project site may have provided habitat for special-status wildlife species at some time in the past, historical farming and development have substantially modified natural habitats in the greater project vicinity. Of the wildlife species identified in the CNDDB, Swainson's hawk and burrowing owl are the only species that have potential to occur in the site on more than a transitory or very occasional basis. Other special-status birds may fly over or forage in the area on occasion but would not be expected to nest in or immediately adjacent to the project site. Additional and more detailed information on these species is provided in Appendix B.

A pair of nesting Swainson's hawks were observed using a nest in a large tree adjacent to the northeast corner of Building 1. The ruderal grassland in the site provides some Swainson's hawk foraging habitat and it is likely Swainson's hawks forage in the site each year.

The ruderal grasslands in the site provide suitable burrowing owl foraging habitat and there are numerous ground squirrel burrows in and adjacent to the site that are suitable for nesting. Burrowing owls were observed using a cluster of burrows in the northwest corner of the site, just south of Louise Avenue. Burrowing owls were also observed adjacent to site, just west of Building 1, and along the railroad tracks, northeast of the existing building.

The City of Lathrop is a participant in the San Joaquin County Open Space and Multi-Species Habitat Conservation Plan (SJMSCP), and the project will be required to participate in the SJMSCP as a condition of approval. Standard Incidental Take Minimization Measures (ITMMs) under the SJMSCP outline protective measures for Swainson's hawk. In the event that construction commences during the nesting season and Swainson's hawks are nesting in or adjacent to the site. Under these conditions, ITMMs would require a construction setback from the nest tree until nesting is complete. The setback is calculated as twice the diameter of the dripline of the nest tree as measured from under the nest and is usually less than 100 feet.

Standard ITMMs under the SJMSCP also outline protective measures for burrowing owl. If construction is scheduled to commence outside the nesting season and burrowing owls are present on-site, they can be passively relocated. In the event that construction commences during the nesting season and burrowing owls are present on-site, a 250-foot construction setback from the natal burrow would be required until nesting is complete.

Other special-status birds and special-status bats may fly over the area on occasion, but would not be expected to nest or roost in or immediately adjacent to the project site. The site does not provide suitable aquatic habitat for any type of fish, giant garter snake, California red-legged frog, or California tiger salamander. There are no vernal pools or seasonal wetlands in the site for vernal pool branchiopods (i.e., fairy and tadpole shrimp). There are no blue elderberry shrubs in the site, precluding the potential occurrence of valley elderberry longhorn beetle.

The site is not within designated critical habitat for any species.

Environmental Impacts and Mitigation Measures

Swainson's hawk and burrowing owl are the only special-status species, plant or wildlife, that have potential to occur within the project site on more than a transitory or very occasional basis. There are nesting Swainson's hawks on the site and adjacent LOF Pilkington lands.

Swainson's hawks prefer nesting sites that provide sweeping views of nearby foraging grounds consisting of grasslands, irrigated pasture, hay, and wheat crops. There are potentially suitable nest trees within and surrounding the project site, and the annual croplands that make up the majority of the site provide suitable foraging habitat for this species. Project development may result in the loss of potential foraging habitat and nest trees for Swainson's hawk.

Burrowing owl resides in a variety of grasslands and scrub lands that have a low density of trees and shrubs. The primary habitat requirement of the burrowing owl is small mammal burrows for nesting, usually abandoned ground squirrel burrows. The intensity of development, irrigation, and cultivation within and surrounding the project site has reduced the likelihood of burrowing owls using the site for nesting. Burrowing owls nests are located on the LOF Pilkington site in the vicinity of proposed improvements. Nevertheless, burrowing owls may occupy burrows during construction activities, which may directly affect these owls.

The SJMSCP, which covers the City of Lathrop, provides ITMMs for both Swainson's hawk and burrowing owl. Implementation of these ITMMs, along with payment of the SJMSCP fee, would compensate for the loss of habitat resulting from project development, along with avoiding direct impacts on these two species. Implementation of the following mitigation measure, which would require project participation in the SJMSCP, would reduce impacts on special-status species to a level that would be less than significant.

Mitigation Measures:

BIO-1. The developer shall mitigate for the proportionate loss of potential wildlife habitat from the project site by applying for coverage and implementing Incidental Take Minimization Measures (ITMMs) as required by the adopted San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP).

b) Riparian and Other Sensitive Habitats

There is no riparian habitat on or adjacent to the project site. No other sensitive habitats were identified in the biological study. The project would have no impact in this issue area.

c) Wetlands

No Waters of the U.S., including wetlands such as vernal pools, were observed on the project site. There are no streams or other channels on or adjacent to the project site. There is a drain managed by the South San Joaquin Irrigation District (SSJID) located east of the project site; however, there is no apparent connection between the site and the drain. The project would have no impact on Waters of the U.S.

d) Fish and Wildlife Movement

The project site is not located on or adjacent to a stream, and therefore project development would not affect fish migration. The project site is not a known wildlife migration corridor and is unlikely to be one, given its location in the midst of urban development.

The project site contains trees that are and could be used by raptors and other migratory birds during their nesting seasons. If the on-site trees are removed during nesting seasons for these birds, this could have a direct, adverse impact on these birds. The following mitigation measure would avoid such impacts, thereby reducing impacts to a level that is less than significant.

Mitigation Measures:

BIO-2. In the event trees need to be removed or trimmed to facilitate the project, they should be felled or trimmed outside of the general bird nesting season (February 1 through August 31). If not, the developer shall have a nesting bird survey conducted immediately prior to tree trimming or removal. If active nests are found, tree felling or trimming shall be delayed until the young have fledged.

e) Local Biological Requirements

The City does not have ordinances that specifically protect biological resources, other than the Street Tree Ordinance and the Master Street Tree Plan. However, there are no trees on the project site to which the ordinance and plan would apply, since there are no trees on a City public right-of-way. The project would have no impact in this issue area.

f) Conflict with Habitat Conservation Plans

As noted in a), the project would participate in the SJMSCP as required by Mitigation Measure BIO-1. The project would have no impact on this issue.

3.5 CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?				√
b) Cause a substantial adverse change in the significance of a unique archaeological resource (i.e., an artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it contains information needed to answer important scientific research questions, has a special and particular quality such as being the oldest or best available example of its type, or is directly associated with a scientifically recognized important prehistoric or historic event or person)?		√		
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		√		
d) Disturb any human remains, including those interred outside of formal cemeteries?		√		

NARRATIVE DISCUSSION

Environmental Setting

Cultural resources include buildings, sites, structures, objects, or districts which may have historical, architectural, archaeological, cultural, or scientific significance. A cultural resources study for the project was completed in April 2018 by Solano Archaeological Services that included cultural background research, field survey, and Native American consultation. The following information summarizes the results of that report. The report is provided in Appendix C and also available for qualified review at the City of Lathrop.

Ethnographic Setting

The project area lies within the ethnographic territory of the Northern Valley Yokuts. Their territory extended from the foothills of the Coast Range east into the foothills of the Sierra Nevada, north to the Calaveras River and south to the San Joaquin River. Yokut villages, consisted of a few families to several hundred people, usually located along main waterways. Economic life for the Yokuts revolved around hunting, fishing, and collecting plants, with deer, acorns and avian and aquatic resources representing primary staples. The Yokuts used a wide variety of wooden, bone, and stone artifacts to collect and process their food, and used local resources to manufacture an array of primary and secondary tools and implements. Euro-American contact with the Northern Valley Yokuts began with infrequent excursions by Spanish explorers traveling through the Sacramento-San Joaquin Valley in the late 1700s to early 1800s.

Historic Setting

Exploration of the Central Valley began in the 1820's with the arrival of hunters, trappers, and traders. Captain C. M. Weber was a German immigrant who left his native land in 1836 and made his way to Sutter's Fort in present-day Sacramento where he was employed as overseer and general assistant to Sutter. Eventually he made a partnership with Guillermo Gulnac, who obtained a land grant in 1843 of 48,000 acres near French Camp. French Camp is located a few miles north of the project area. Weber moved from San Jose to Stockton in 1847, and purchased the land grant from Gulnac. By the 1860s the area increased in population and importance and other industries began to develop. The Central Pacific Railroad Company announced their intentions to build a rail yard in Lathrop in 1868, which essentially marked the birth of the new community. Chinese labor was brought in to do the work, and a settlement grew up around the rail yard. The first United States Post Office in Lathrop opened in 1871, officially putting the town of Lathrop on the map.

History of the Project Site

Historically, the project site was likely in industrial use. The origins of the project site as it exists today, began with the Libbey-Owens-Ford Company (LOF) who owned several glass manufacturing companies during the early 20th Century in Ohio. In Lathrop, the company specialized in the manufacturing of "float" or flat glass for automobile windshields and windows, and sliding glass patio doors.

Construction of the Lathrop facility began on June 19, 1961 and operations began in 1962. The original plant was approximately 900,000 square feet and employed an estimated 930 people. The plant included warehouse and distribution buildings, several silos, water and diesel tanks, melting furnace, smoke stacks, and rail spurs. Some portions of the original plant have since been removed.

In 1986, LOF sold its business to Pilkington, a glass manufacturing company that assumed control and ownership of the Lathrop plant. In 2006, the Nippon Sheet Glass company, now known as the NSG Group, acquired the Pilkington ownership. The Lathrop glass manufacturing facility continued operation for another seven years, when the NSG Group announced the closure of the plant in 2013 due to the cost of new furnace equipment and pollution control measures needed to comply with the San Joaquin Valley Air Pollution Control District standards.

Recently, the California Legislature enacted AB 52, which focuses on consultation with Native American tribes on land use issues potentially affecting the tribes. The intent of this consultation is to avoid or mitigate potential impacts on "tribal cultural resources," which are defined as "sites,

features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe." Under AB 52, when a tribe requests consultation with a CEQA lead agency on projects within its traditionally and culturally affiliated geographical area, the lead agency must provide the tribe with notice of a proposed project within 14 days of a project application being deemed complete or when the lead agency decides to undertake the project if it is the agency's own project. The tribe has up to 30 days to respond to the notice and request consultation; if consultation is requested, then the local agency has up to 30 days to initiate consultation.

The City of Lathrop provided AB 52 notification to the tribes on April 26, 2018. No responses or requests for consultation have been received to date.

Records Search Results

A detailed review of historical references, maps, and previous survey reports as well as archeological site records was conducted for the project site and vicinity through the California Historical Resources Information System (CHRIS) Records Search. The records search indicated that no previously documented cultural or archaeological resource studies have been completed for the proposed site and no cultural or archaeological resources have been documented on or adjacent to the site.

Based on the records search and literature review, four archaeological studies have been conducted within 0.25-miles of the project site and are summarized in the table below.

Table 3-3
Studies Completed within 0.25 mile of Project Area

Report Number	Author	Title	Date
SJ-02211	McClintock	I-5/Louise Avenue Interchange CalTrans Negative Archaeological Survey Report	1993
SJ-04192	Jensen	Seven Proposed School Sites within the San Joaquin School System, San Joaquin County	2000
SJ-04807	Gross	Cultural Resources Survey for the Mossdale Landing Urban Design Concept, City of Lathrop	2002
SJ-07188	McKale and Konzak	Historic Property Survey Report for Interstate 5/Louise Avenue/River Islands Parkway Interchange Improvements Project	2009

Source: Solano Archaeological Services 2018

Field Survey Results

A cultural and archaeological resources field survey was conducted for the project site on April 4, 2018 (Appendix C). The results are summarized below.

During the course of the archaeological survey, four potentially historic structures were identified; a water tank, railroad spur, silos, and smoke stack. All of these structures were associated with the Pilkington facility and were built between 1962 and 1964 according to online documentation. Each structure exhibits varying degrees of modification and renovation since the original construction, and are described below.

Water Tank –This structure is constructed of riveted sheet metal and stands approximately 150 feet high, and is supported by six cylindrical legs with cross beam supports. The main tank, measuring approximately 75 feet wide, is spherical and is circumnavigated by a maintenance walkway.

Railroad spurs – Segments of the original railroad spur (approximately 4 feet wide) were seen in both the southern and western portion of the site. Most areas of the original spurs showed sign of decay, including slightly rusty rails and deteriorating ties. Some old railroad spikes were noted off to the side of the tracks. Other portions of the original spurs, such as the one located south of the main Pilkington facility warehouse, have been maintained with newer ties and rails.

Silos – Three silos are constructed of riveted metal and stand approximately 200 feet high by 100 feet in diameter. They have a platform across the top which may have been accessed by a crane or what appears to be an elevator shaft. A smaller 50-foot high warehouse made from corrugated metal with a large 20-foot high roll-top door is located on the east side of the silos and provides access from the railroad spur. Adjacent to the south of the silos is a 50 foot x 20-foot brick warehouse building with large rolling shipping doors.

Smoke Stack – A single approximately 275 foot smoke stack stands prominently in the west-central portion of the site. It is made from riveted metal and exhibits alternating stripes of burnt orange and white bands. The structure tapers to a smaller radius, two thirds of the way up, then tapers outward again toward the top. There are several access ladders and maintenance platforms, and the stack is no longer in use.

Unique Geologic and Paleontological Resources

Geological materials underlying the site consist of mixed alluvial deposits. There are no unique geological features located on the project site.

Paleontological resources are fossils or groups of fossils that are unique, unusual, rare, uncommon or important, and those that add to an existing body of knowledge in specific areas. Surface examination of a study or project area often does not reveal whether paleontological resources are present. Most of the Lathrop area is located on the lower terraces of the San Joaquin River; the Quaternary lake and marsh deposits have the potential for fossils to occur, but occurrences, if any, are likely to be encountered below the upper five to ten feet of sediment (San Joaquin County 2009). There are no known existing paleontological resources on the project site.

The project site is underlain by the Modesto Formation, a geologic formation that has yielded paleontological resources. Paleontological resources have been encountered in San Joaquin County. A record search of the Museum of Paleontology at the University of California in Berkeley indicated that 97 paleontological finds have been made in the County. The vast majority of specimens from the County have been found in rock formations in the foothills of the Diablo Mountain Range. However, remains of extinct animals, such as mammoth, could be found virtually anywhere in the County, especially along watercourses such as the San Joaquin River and its tributaries (San Joaquin County 2009).

The project site has been historically developed for industrial and manufacturing purposes. The site is flat and has been previously graded and disturbed. The project site does not contain any known unique geologic features and the discovery of paleontological resources is unlikely.

The following sections address the potential impacts of the project on "cultural resources" as traditionally defined under CEQA: that is, historical resources, archaeological resources including human burials, and paleontological resources. The State of California provided for CEQA consideration of an additional set of cultural resources, known as Tribal Cultural Resources, through the passage of Assembly Bill 52 (AB 52) in 2014. Tribal Cultural Resources are treated separately in the standard CEQA checklist (CEQA Guidelines Appendix G) and are addressed in this document consistent in Section 3.17 with the order of the CEQA checklist.

There is considerable overlap between resources previously identified as "cultural" and identified after AB 52 as "tribal cultural." If requested by a tribe, a local agency must provide notice of projects to tribal representatives. Archaeological sites and human burials may be considered to be of both general and tribal cultural concern. If a project may involve impacts on cultural resources, mitigation measures are similar for both types of resources, except that mitigation measures for tribal cultural resources involve participation by tribal representatives.

a) Historic Resources

The April 2018 cultural resources survey identified four potential historic structures on the project site; a smoke stack, silos, railroad spur, and water tank associated with the former glass plant. The existing structures were likely built between 1962 and 1964 and are no longer in use.

The project site and existing structures are not historic structures designated or identified as historic in previous cultural resource surveys or reports, or other cultural resource determination. The project site is not listed in the California Register of Historical Resources or any federal, state, or local historic registries. The Lathrop General Plan and General Plan EIR do not identify the project site or its associated structures as historic or having substantial historical value.

According to the CEQA Guidelines (14 CCR § 15064.5), Determining the Significance of Impacts to Archaeological and Historical Resources, a cultural resource is considered historically significant if it meets the following:

> (1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code §5024.1, Title 14 CCR, Section 4850 et seq.).
>
> (2) A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
>
> (3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically

significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code, § 5024.1, Title 14 CCR, Section 4852) including the following:

> (A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
>
> (B) Is associated with the lives of persons important in our past;
>
> (C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
>
> (D) Has yielded, or may be likely to yield, information important in prehistory or history.

(4) The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.

The City has considered whether the smoke stack, silos, rail spurs, and water tank are historically significant per criteria A-D of Public Resources Code, §5024.1, Title 14 CCR, Section 4852. The existing structures are not historic structures designated or identified as historic in previous surveys or reports, is not listed in any federal, state, or local historic registries, and are not considered significant to the history of the City of Lathrop. The City has made a determination that the resources on the project site are not historically significant. As a result, the project would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.

b) Archaeological Resources

As previously noted, the pedestrian field survey and records search of proposed and future development areas did not find any prehistoric archaeological resources that would be considered "unique" and therefore cause significant effects under CEQA. However, the potential exists to unearth buried and/or previously undiscovered archaeological resources during construction activities. The disturbance of any archaeological resources has the potential to involve a significant cultural resources effect.

Potential for significant archaeological impacts will be reduced by the implementation of Mitigation Measures TCR-1, TCR-2, and TCR-3, in Section 3.17 would require notification of the City, the County Coroner and tribal representatives as appropriate and trigger inspection, significance evaluation and the provision of recommendations for treatment by qualified professionals as well as implementation of recommendations by the project proponent. Proper treatment of any resources or remains encountered would be necessary to avoid significant environmental effects. Compliance with these mitigation measures will reduce potential archaeological effects to a less than significant level.

Mitigation Measures:

Implement Mitigation Measures TCR-1, TCR-2, and TCR-3

c) Paleontological Resources and Unique Geologic Features

No unique geologic features are located on the project site, and subsurface exploration of the site did not reveal any evidence of paleontological resources. Nevertheless, it is conceivable that excavation associated with project development could unearth paleontological materials of unknown significance. Mitigation Measure CULT-1 provides for interruption of construction in such an event, inspection of resources encountered by a qualified paleontologist and mitigation of potential effects as specified by the paleontologist. Mitigation measures CULT-1 and CULT-2 will reduce potential paleontological effects to a less than significant level.

Mitigation Measures:

CULT-1. All construction personnel shall receive brief "tailgate" training by a qualified archaeologist in the identification of paleontological resources, buried cultural resources, including human remains, and protocol for notification should such resources be discovered during construction work.

CULT-2. If any subsurface historical or paleontological resources are encountered during construction of the project, all construction activities in the vicinity of the encounter shall be halted until a qualified archaeologist, or paleontologist as appropriate, can examine these materials, make a determination of their significance and, if significant, recommend further measures that would reduce potential effects to a less than significant level, consistent with the requirements of CEQA. The Lathrop CDD shall be notified in the event of a discovery, and the ODS shall be responsible for retaining qualified professionals, implementing recommended mitigation measures and documenting mitigation efforts in written reports to the CDD, consistent with the requirements of the CEQA Guidelines.

d) Human Burials

Although cultural resource investigations to date have not revealed the presence of human burials on the site, human remains potentially could be encountered during construction or other ground disturbing activities. As a result, the project has the potential to result in a significant cultural resources effect. Potential effects on Native American human remains would also involve the potential for significant impacts on tribal cultural resources.

CEQA Guidelines Section 15064.5(e) details steps to be taken when human remains are uncovered in a location outside a dedicated cemetery. All work in the vicinity of the find shall be halted and the County Coroner shall be notified to determine if an investigation of the death is required. If the County Coroner determines that the remains are Native American in origin, then the County Coroner must contact the Native American Heritage Commission within 24 hours. The Native American Heritage Commission shall identify the most likely descendants of the deceased Native American, and the most likely descendants may make recommendations on the disposition of the remains and any associated grave goods with appropriate dignity. If a most likely descendant cannot be identified, the descendant fails to make a recommendation, or the landowner rejects the recommendations of the most likely descendant, then the landowner shall rebury the remains and

associated grave goods with appropriate dignity on the property in a location not subject to further disturbance.

Compliance with the provisions of CEQA Guidelines Section 15064.5(e) are incorporated into Mitigation Measures TCR-1, TCR-2, and TCR-3 described in Section 3.17. These mitigation measures would reduce this potential effect to a less than significant level.

Mitigation Measures:

Implement Mitigation Measures: TCR-1, TCR-2, and TCR-3

3.6 GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				√
b) Result in substantial soil erosion or the loss of topsoil?		√		
c) Be located on strata or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				√
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property?			√	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal				√

systems where sewers are not available for the disposal of wastewater?				

NARRATIVE DISCUSSION

Environmental Setting

The project area is located in the northern portion of the San Joaquin Valley, in the Great Valley Geomorphic Province of California. The Great Valley is an alluvial plain, approximately 50 miles wide and 400 miles long, located between the Coast Ranges and the Sierra Nevada. The elevation at the extreme northern and southern ends of the valley is about 400 feet and is slightly above sea level at the center. It is drained by the Sacramento and San Joaquin Rivers, which join in the Sacramento-San Joaquin Delta and enter the San Francisco Bay. The valley is filled with flat-lying sediments as much as 20,000 to 40,000 feet thick. Beneath the valley, Cretaceous and Cenozoic strata form a U-shaped trough that is steeper on the west than the east. The edges of the layers of sedimentary rock can be seen along the western edge of the trough adjacent to the Coast Ranges (USGS 2017).

The sediments that form the Valley floor were derived largely from erosion of the Sierra Nevada. The smaller and steeper slopes on the west side of the Valley overlie sedimentary rocks more closely related to the Coast Ranges. Most of the soils located within the San Joaquin Valley consist of sand, silt, loamy clay alluvium, peat, and other organic sediments. These soils are the result of long-term natural soil deposition and the decomposition of marshland vegetation. The Geologic Map of the San Francisco-San Jose Quadrangle, compiled by Wagner et al. (1991), designates the underlying geology the project area as Modesto Formation. The Modesto Formation is described as loose aeolian (transported by wind) sands, loose fluvial (deposited by streams) sands and silts, and compacted fluvial sands and silts.

Based on review of the Natural Resources Conservation Service Web Soil Survey Interactive Map, and the Soil Survey of San Joaquin County, the major soil types within the project site include Timor loamy sand, Tinnin loamy coarse, and Urban land.

Timor soils consists of deep to hardpan, moderately well drained soils formed in alluvium from granitic rock sources. Timor soils are found on low fan terraces of alluvial fans with slopes of 0 to 2 percent and elevations between 20 and 40 feet. These soils have a high potential for wind erosion, low potential for water erosion, and low shrink-swell potential.

Tinnin soils are characterized as very deep, well drained soils formed in predominantly granitic alluvium or eolian sands. Timor soils are on low alluvial terraces of fans and narrow ridges and mounds with slopes of 0 to 9 percent (NRCS 2018). Tinnin soils also have a high potential for wind erosion and low potential for water erosion.

“Urban land”, otherwise unclassified soil types, are typically located in developed areas; these soils have been manipulated, disturbed, or transported by human activities. These soils can be found in flat and steep areas.

The California Geological Survey does not include the project site in an Alquist-Priolo Earthquake Fault Zone (California Geological Survey 2015). The project site, along with the rest of San Joaquin

County, is subject to seismic shaking from fault features east and west of the County, including the Midway, Hayward/Rodgers Creek, San Andreas, and Calaveras Faults (San Joaquin County 2009). In the Lathrop area, ground-shaking equivalent to an intensity of VIII or IX on the Modified Mercalli Scale may occur. Intensity VIII earthquakes can cause structure damage that ranges from "slight" in specially-designed structures to "great" in poorly-built structures. (CDMG 1973).

Soil compaction and settlement can result from seismic ground-shaking. If the sediments that compact during an earthquake are saturated, soils may lose strength and become fluid – a process called liquefaction. Liquefaction causes soil to lose its supporting structure and can result in buildings and other facilities settling into the ground. Based on known information, areas of the County with groundwater less than 50 feet from ground surface in unconsolidated sediment are susceptible to liquefaction. According to the project geotechnical study, approximate depth to groundwater is 15 feet (Berloger, Stevens & Associates 2015).

Slope instability or landslides can result in the movement of material down a slope or gradient. Areas at risk from landslides within San Joaquin County are mostly confined to the foothills and mountains that border the county, steep banks along the major rivers, and the levees of the Delta (San Joaquin County 2010). Landslides typically occur on steep slopes after the ground and soils have been saturated. Steep slopes are not located in the vicinity of the project site. The project site is located in area of flat topography with slopes ranging from 0 to 2 percent. The potential for landslides occurring on or adjacent to the Project site is very low.

The Alquist-Priolo Earthquake Fault Zoning Act and the Seismic Hazards Mapping Act (1990) direct the State Geologist to delineate regulatory "Zones of Required Investigation" for possible earthquake faulting, landslides, and liquefaction. The zones are delineated to reduce the threat to public health and safety and to minimize the loss of life and property posed by earthquake-triggered ground failures. Cities and counties must regulate development within these zones. The project site is not located within any Zones of Required Investigation (CGS 2017).

Environmental Impacts and Mitigation Measures

a-i) Fault Rupture Hazards

There are no active faults on or near the project site, and the site is not located within or adjacent to an Alquist-Priolo Earthquake Zone. Therefore, the project would not be at risk of any known fault rupture hazard.

a-ii) Strong Seismic Ground Shaking

The project site is located within a seismically active region and could be subject to ground shaking if an earthquake occurs. However, damage is typically greater in areas where soils are fine-grained and saturated. Soils on the project site are characterized as hardpan and well drained and would be less susceptible to the impacts of ground shaking (Berloger, Stevens & Associates 2015). The proposed manufacturing buildings are single story buildings and would be constructed on foundations which would reduce risk of damage if ground shaking occurs. Construction of all project facilities would conform with the seismic design standards outlined in the 2016 California Building Standards Code (California Code of Regulations, title 24, parts 1-12) which has been adopted by the City of Lathrop. The seismic design criteria would protect buildings and structures from seismic impacts and damage and reduce potential adverse impacts on public health and safety to a less than significant level.

(a-iii) Liquefaction

According to the geotechnical study completed by Berloger, Stevens & Associates, the soils on the project site are described as sand and sandy loams and the depth to ground water is approximately 15 feet. The site could experience approximately 2 inches of total liquefaction induced settlement and 1 inch of differential settlement in an approximately 100-foot span. Surface manifestation from liquefaction (such as sand boils, ground fissures, etc.) is not anticipated. Implementation of the mitigation measure below would reduce adverse impacts to a less than significant level.

Mitigation Measures:

GEO-1. The City of Lathrop shall review and approve a site-specific, design-level geotechnical study for the project, if appropriate the study completed for the site by Berloger, Stevens & Associates, prior to issuing a grading and building permit. All geotechnical engineering and design recommendations included in the approved study shall be implemented during project design and prior to construction.

(a-iv) Landslides

The project site and its surroundings are flat and not prone to landslide hazards. The project would have no impact in this issue area.

b) Soil Erosion or Loss of Topsoil

The soils on the project site have a high wind erosion potential due to their sand content. Loamy sand soils are moderately well drained and have a low water erosion potential. Grading and excavation could generate fugitive dust and expose soils to runoff and wind erosion. Storm water would be conveyed to the proposed detention basin that borders the southern edge of the project site which would minimize off-site soil erosion and runoff. The project would be required to follow the Multi-Agency Post-Construction Storm Water Standards Manual and comply with the City's Storm Water Development Standards, as required by the Regional Water Quality Control Board (RWQCB). The Storm Water Development Standards are in response to the requirements contained in the City's Municipal Separate Storm Sewer System (MS4) National Pollutant Discharge Elimination System (NPDES) Permit, and are intended in part to protect the quality of the stormwater runoff and the receiving waters that surround Lathrop.

An erosion control plan is required as part of compliance with the Storm Water Development Standards which utilizes Best Management Practices (BMPs) to limit erosion during and after construction. The following mitigation measure specifies this requirement. Implementation of this mitigation measure as well as GEO-1 would control potential erosion, thereby reducing impacts to a level that would be less than significant. In addition, compliance with SJVAPCD Regulation VIII (see Section 3.3, Air Quality), designed to control fugitive dust emissions, would also control potential soil erosion.

Mitigation Measures:

GEO-2. Prior to issuance of a grading permit, the project contractor shall submit, for the review and approval of the Public Works Department, an erosion control plan that complies with the City's Storm Water Development Standards and utilizes Best Management Practices (BMPs) to limit the erosion effects during

construction of the proposed project. Measures could include, but are not limited to:

- Hydro-seeding
- Placement of erosion control measures within drainage ways and ahead of drop inlets;
- The temporary lining (during construction activities) of drop inlets with "filter fabric" (a specific type of geotextile fabric);
- The placement of straw wattles along slope contours and back-of-curb prior to installation of landscaping;
- Directing subcontractors to a single designated "wash-out" location (as opposed to allowing them to wash-out in any location they desire);
- The use of siltation fences; and
- The use of sediment basins and dust palliatives.

c) Geologic Instability

The project site is generally level, stabilized, and comprised by alluvium derived from granitic rock structures which are generally not susceptible to landslides and have a low risk of lateral spreading or collapse (Berloger, Stevens & Associates 2015). In addition, mitigation measures GEO-1 and GEO-2 would be implemented. Therefore, the project would have less than significant impacts on soil stability.

d) Expansive Soils

The shrinking or expansion of soils due to changes in moisture content can result in damage over time to building foundations, structures, or underground utilities. However, according to NRCS Web Soil Survey and San Joaquin County data viewer, soils within the project site are not expansive and have a low shrink-swell potential. Therefore, impacts related to expansive soils would be less than significant.

e) Adequacy of Soils for Sewage Disposal

The project would be connected to the City's sewer system; therefore, soil capability of supporting septic systems is not an issue. The project would have no impact on this issue.

3.7 GREENHOUSE GAS EMISSIONS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			√	

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?		√		

NARRATIVE DISCUSSION

Environmental Setting

Greenhouse gases (GHGs) are gases that absorb and emit radiation within the thermal infrared range, trapping heat in the earth's atmosphere. GHGs are both naturally occurring and are emitted by human activity. GHGs include carbon dioxide (CO_2), the most abundant GHG, as well as methane, nitrous oxide and other gases. GHG emissions in California in 2015 were estimated at approximately 440 million metric tons carbon dioxide equivalent (CO_2e) – a decrease of approximately 10.0% from the peak level in 2004. Transportation was the largest contributor to GHG emissions in California, with approximately 37.4% of total emissions. Other significant sources include industrial activities, with 20.8% of total emissions, and electric power generation, with 19.0% of total emissions (ARB 2017a).

Increased atmospheric concentrations of GHGs are considered a primary contributor to global climate change, which is a subject of concern for the State of California. Potential impacts of global climate change in California include reduced Sierra Nevada snowpack, increased wildfire hazards, greater number of hot days with associated decreases in air quality, and potential decreases in agricultural production (Climate Action Team 2010).

Unlike the criteria air pollutants described in Section 3.3, Air Quality, GHGs have no "attainment" standards established by the federal or State government. In fact, GHGs are not generally thought of as traditional air pollutants because their impacts are global in nature, while air pollutants mainly affect the general region of their release to the atmosphere (SJVAPCD 2015b). Nevertheless, the U.S. Environmental Protection Agency (EPA) has found that GHG emissions endanger both the public health and public welfare under Section 202(a) of the Clean Air Act due to their impacts associated with climate change (EPA 2009).

GHG Emission Reduction Plans

The State of California has implemented GHG emission reduction strategies through Assembly Bill (AB) 32, the Global Warming Solutions Act of 2006, which requires total statewide GHG emissions to reach 1990 levels by 2020, or an approximately 29% reduction from 2004 levels. In compliance with AB 32, the State adopted the Climate Change Scoping Plan in 2008 and updated it in 2014. Primary strategies addressed in the original Scoping Plan included new industrial and emission control technologies; alternative energy generation technologies; advanced energy conservation in lighting, heating, cooling and ventilation; fuels with reduced carbon content; hybrid and electric vehicles; and methods for improving vehicle mileage (ARB 2008). The 2014 update highlights California's progress toward meeting the 2020 GHG emission reduction goal of the original Scoping Plan, and it establishes a broad framework for continued emission reductions beyond 2020, on the path to 80% below 1990 levels by 2050 (ARB 2014). It should be noted that the 2050 reduction target was set by an executive order and has not been incorporated into State law.

In 2016, Senate Bill (SB) 32 was enacted. SB 32 extends the GHG reduction objectives of AB 32 by mandating statewide reductions in GHG emissions to levels that are 40% below 1990 levels by the year 2030. The State has adopted an updated Scoping Plan that sets forth strategies for achieving the SB 32 target. The updated Scoping Plan continues many of the programs that were part of the previous Scoping Plans, including the cap-and-trade program, low-carbon fuel standards, renewable energy, and methane reduction strategies. It also addresses for the first time GHG emissions from the natural and working lands of California, including the agriculture and forestry sectors (ARB 2017b). Recently, the State Legislature extended the cap-and-trade program from its original expiration date in 2020 to 2030.

The SJVAPCD adopted a Climate Change Action Plan in 2008 and issued guidance for development project compliance with the plan in 2009. The guidance adopted an approach that relies on the use of Best Performance Standards to reduce GHG emissions. Projects implementing Best Performance Standards would be determined to have a less than cumulatively significant impact. For projects not implementing Best Performance Standards, demonstration of a 29% reduction in project-specific (i.e., operational) GHG emissions from business-as-usual conditions is required to determine that a project would have a less than cumulatively significant impact (SJVAPCD 2009).

Environmental Impacts and Mitigation Measures

a, b) Significance of GHG Emissions and Consistency with GHG Reduction Plans

The CalEEMod model estimated the total GHG construction and operational emissions associated with the project (see Appendix A). Table 3-4 presents the results of the CalEEMod run. "Mitigated emissions" are the result of project compliance with applicable laws and inclusion of project features. These include the following:

- The project site is approximately 0.8 miles from downtown Lathrop.
- The project site is approximately 0.1 miles from bus stops along Louise Avenue.
- The project would improve pedestrian facilities.
- SB X7-7 in 2009 sets an overall goal of reducing per capita urban water use by 20% by December 31, 2020. The California Green Building Code mandates a 20% reduction in indoor water use.
- AB 341 establishes the goal of diverting 75% of California's waste stream from landfills by 2020.

Table 3-4
Estimated Project GHG Emissions

GHG Emission Type	Unmitigated Emissions	Mitigated Emissions
Construction[1]	862	862
Operational[2]	7,276	5,476

[1] Total GHG emissions for construction period in tons carbon dioxide equivalent (CO2e). Minimal mitigation was applied to construction emissions.
[2] Annual emissions in tons CO_2e.
Source: CalEEMod v. 2016.3.2.

As indicated in Table 3-4, project construction GHG emissions would be approximately 862 tons CO_2e for the construction period. These emissions are not considered substantial, as these emissions would be limited to the work period and would cease once construction work is completed. The project would generate a total of 7,277 estimated tons of CO2e annually. Using the assumptions described above, mitigated operational GHG emissions from the project would be 24.75% less than under business-as-usual (unmitigated) conditions. The GHG reduction would be short of the 29% reduction goal set by the SJVAPCD Climate Change Action Plan for operational emissions.

As described in Section 3.3, Air Quality, SJVAPCD Rule 9410 requires employers to prepare an Employer Trip Reduction Implementation Plan (ETRIP) for each worksite with 100 of more eligible employees. The ETRIP includes a combination of strategies designed to reduce the VMT by employees in private vehicles used to commute to and from the worksite. Strategies include Transportation Demand Management (TDM) measures to reduce employee trips. SJCOG has developed a program that encourages the preparation of a TDM plan that includes measures such as bike racks/lockers, preferential parking, transit passes and/or subsidies, shuttle service, and telecommute/flex schedules among others. Implementation of a TDM plan would reduce VMT, which in turn would reduce GHG emissions. Mitigation described below would require preparation of a TDM plan applicable to the development that would reduce GHG emissions by at least 4.25% from business-as-usual levels, which would make reductions consistent with the 29% reduction goal set by the SJVAPCD Climate Change Action Plan for operational emissions. Impacts after mitigation would be less than significant.

Mitigation Measures:

GHG-1. The ODS shall, in cooperation with the City, SJVAPCD and SJCOG, prepare and implement a Transportation Demand Management (TDM) Plan for the project that includes consideration of preferential vanpool and carpool parking spaces, on-site amenities that encourage alternative transportation modes such as locker and shower secure bicycle parking, on-site services that reduce mid-day trips, telecommuting options and provision of information regarding these and other trip-reducing measures available to employees. The plan shall be subject to City review and approval prior to issuance of the first building permit for building construction in the project area.

3.8 HAZARDS AND HAZARDOUS MATERIALS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			√	
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?				
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				√
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?				√
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				√
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				√
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				√
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?			√	

NARRATIVE DISCUSSION

Environmental Setting

Pursuant to Government Code Section 65962.5, a search of the California State Water Resources Control Board (SWRCB) GeoTracker website, and the California Department of Toxic Substances Control (DTSC) EnviroStor website was conducted to determine if any hazardous materials sites are located on or adjacent to the project site.

The project is located just west of the J.R. Simplot property, a fertilizer manufacturing facility located at 16777 Howland Road. According to the California State Water Resources Control Board interactive Geotracker webmap, two cleanup program sites are located on the J.R. Simplot property addressing previous soil and groundwater contamination from the manufacture of fertilizers and a leaking underground gas and diesel storage tanks. These concerns date to in 1983, when the site was occupied by Occidental Chemical Corporation. As a part of the remediation process, groundwater monitoring and extraction wells were placed on the Simplot property to monitor the movement pollutants and potential contamination into groundwater. Some wells have since been

removed from the Simplot property and some are still being monitored. The status of both cleanup program sites is Open-Site Assessment as of March 2018 (CSWRCB 2018).

An additional cleanup program site is located within the project site, east of the larger Butler building and approximately 300 feet north of the railroad spur. The site is a result of a leaking underground diesel fuel supply line from an aboveground storage tank that occurred in 1996. In response to the leak, several groundwater monitoring wells and extraction wells were installed near the spill site, and groundwater monitoring and reporting has been ongoing. In 2015, a dual phase groundwater extraction remediation system was installed, which has improved the remediation process and groundwater conditions. As of the January 2018, the extraction system and groundwater are continuing to be monitored. It is anticipated that as groundwater conditions improve, the monitoring wells will be closed and removed. The status of the cleanup site is Open-Remediation as of March 2018 (CVRWQCB 2018).

Based on review of the California Department of Toxic Substances Control (DTSC) EnviroStor website, a hazardous materials disposal site was identified in 1982 on a portion of the former LOF site immediately south of the proposed project. This site was used to dispose glass cullet and other waste materials associated with the production of glass. This site, approximately 80 feet south of the railroad in the southwest portion of the project site, is now owned and operated by Buzz Oates Development and Construction Services LLC and is under development for industrial use. Several investigations of the site were conducted in 2015 with the oversight of the San Joaquin County Environmental Health Department and the Central Valley Regional Water Quality Control Board (RWQCB), including trenching, exploratory borings, and soil and groundwater sampling. Samples collected from the site have indicated no contamination or significant impact to the shallow groundwater; however, additional testing has been performed (AdvancedGeo Environmental 2017). In January 2018, Buzz Oates submitted a Draft Excavation and Materials Management Plan to the Central Valley RWQCB to address the disposal of the remaining waste on the site. The plan includes additional soil and groundwater testing prior to completion of disposal and cleanup activities. Approval of this plan is pending.

According to its Hazardous Materials Viewer and chemical inventory information, alumina, perlite, and ethylene glycol were previously used on the site for the manufacturing of glass (San Joaquin County Environmental Health Department 2018). Glass manufacturing and use of those substances occurred in the 1980s and no longer occurs on the site. The current Kraft Heinz warehousing and distribution activities are not known to involve the handling or production of chemical substances or to produce hazardous waste.

Environmental Impacts and Mitigation Measures

(a) Use, Transport, or Disposal of Hazardous Materials and Wastes

Construction of proposed industrial structures and site improvements would involve the use of hazardous materials such as fuels and solvents and a potential for hazardous material spills. Typically, construction vehicles and equipment would transport and use fuels in ordinary quantities. Fuel spills, if any occur, would be relatively small and would not involve significant adverse effects. Building and paving operations would involve of paints, adhesives, sealants and other potentially hazardous material.

Potential hazardous materials spills during construction must be addressed in the required Storm Water Pollution Prevention Plan (SWPPP). In accordance with SWPPP requirements, contractors

have absorbent materials at construction sites to clean up minor spills. Other substances used in the construction process would be stored in approved containers and used in relatively small quantities, in accordance with the manufacturers' recommendations and/or applicable regulations. Project construction impacts in this issue area are considered less than significant.

The project proposes the development of what are expected to be largely warehousing and distribution activities on the project site. Goods moving through and stored at the facility could include hazardous materials. However, hazardous materials, if any, would be packaged and labeled for appropriate handling during transportation and storage in compliance with applicable local, state, and federal regulations. Under normal conditions, the project would not involve a substantial predictable environmental risk at the project site. The project's effects in these issues would be considered less than significant.

Proposed industrial structures may also be occupied by businesses that involve transportation, use, storage or production of hazardous materials that require special handling, including hazardous wastes, and including substantial amounts of such materials. Businesses involving use and storage above certain thresholds are required to submit a Hazardous Materials Business Plan that includes emergency response plans and procedures in the event of a reportable release or threatened release of a hazardous material, along with a plan to train employees in safety procedures. As a result, potential project use and storage of hazardous material regulations would not involve a significant environmental risk.

If the volume of hazardous materials on individual business sites would exceed "reportable quantities" standards, hazardous material use must be reported on the California Environmental Reporting System (CERS). CERS registration and reporting makes project-related information available to regulatory agencies associated with hazardous materials and waste management. In San Joaquin County, this is the County Environmental Health Department (EHD), which is responsible for the various applicable hazardous materials management programs in its role as the Certified Unified Program Agency (CUPA). Upon registration and based on the reported information and associated risks, the EHD will determine the type of permit required for the facility and the permit fees to be assessed. Upon permitting, the EHD will become responsible for periodic inspections for regulatory compliance and correction orders as needed. The owner will remain responsible for proper on-site management of hazardous materials in accordance with the requirements established in the applicable regulations, facility permits and the Hazardous Materials Business Plan, if required.

Facilities that handle more than 55 gallons, 500 pounds or 200 cubic feet (compressed gas) of hazardous material are required to complete and submit a Hazardous Materials Business Plan (HMBP) to the CERS. The HMBP provides basic information to "first responders" (fire, police) so that threats to public safety or the environment can be minimized in the event of a release or threatened release. The HMBP is required to include an inventory of hazardous materials used on-site, emergency response plans and procedures to be followed in the event of a release or threatened release, a plan for training and refresher training of employees in response plans and procedures and a map detailing the location of access, shutoffs, drains, evacuation staging areas and hazardous material handling and storage locations for use by emergency responders. The level of permitting, HMBP requirements and emergency response and reporting responsibilities are scaled based on the hazard level associated with the facility.

The transportation, use and storage of hazardous materials in conjunction with future industrial use of the site is not, as a result of existing regulation and management as described above, expected to result in significant effects in this issue area.

(b) Upsets, Accidents and Release of Hazardous Materials

It's possible that leaks or spills of relative minor amounts of hazardous materials such as paint, solvents, or gasoline could occur during day-to-day industrial operations on the developed project site. Under the California General Industrial Permit, future industrial uses would be required to develop a spill prevention and response plan, which would contain procedures and guidelines to protect human safety and the environment in the event of a spill. Following spill prevention and response plans and site safety plans would reduce the potential for accident conditions involving the release of hazardous materials to a less than significant level.

The proposed project would involve the demolition of a 275-foot exhaust stack, silos, water tower, and diesel storage tank that remain from the former glass manufacturing operation. Due to the age and extensive period of operation and variety of potential uses of these facilities over time, the existence of hazardous substances in construction materials in coatings, deposits or residues is unknown. Demolition of taller structures would require the use of specialized demolition equipment, worker safety concerns and potential for releases of dust, fluids or dust-control water containing hazardous materials to the environment. The applicant indicates that demolition would be the responsibility of specialized contractors with experience in demolition of the types of structures present while maintaining worker and environmental safety. Structures proposed for demolition would be tested for the presence of hazardous materials and potential hazards associated with demolition would be abated. The City and the San Joaquin Valley Air Pollution Control District (SJVAPCD) would be notified prior to the start of abatement or demolition activities. A demolition permit would need to be obtained from the SJVAPCD and City of Lathrop prior to demolition.

Demolition and removal of these and other existing structures, due to their age and potential inclusion of asbestos-containing materials, could involve release of asbestos fibers into the air and associated human health hazards. Obtaining City demolition permit will trigger compliance with existing SJVAPCD regulations; SJVAPCD regulations will in turn reduce these potential effects to a less than significant level.

Mitigation Measures:

HAZ-1. Demolition of existing above-ground structures shall be conducted in accordance with a City demolition permit and applicable conditions. Demolition procedures, safety requirements and environmental protections shall be defined in a demolition plan prepared by the applicant and subject to the approval of the Building Official and City Engineer. The demolition plan shall define the required qualifications of demolition contractors. Preparation of the demolition plan shall include testing as required to define potential environmental hazards and mitigation needed during demolition to protect worker and public health and safety. The demolition plan shall identify waste materials to be produced and their disposition.

HAZ-2. Prior to grading activities, the ODS or its contractor shall retain a qualified professional to collect and analyze soil samples as required to determine whether pesticide residues or other contaminants are present and, if present, whether they pose a health risk to construction workers or an environmental contamination risk. If so, the ODS shall prepare and implement a risk reduction plan that will reduce risk to construction workers.

c) Use or Emissions Near Schools

Future industrial development associated with the project would not involve identifiable use, storage or transport of hazardous materials, substances or waste products. The project site is located approximately 0.8 miles from the nearest school. Therefore, the project would not involve hazardous emissions within ¼ mile or near existing or proposed schools. The project would have no effect in this issue area.

d) Hazardous Materials Sites

An existing cleanup site is located east of the larger Butler building in the southern portion of the project site. Groundwater contamination is being treated and monitored on an ongoing basis under the supervision of the Regional Water Quality Control Board (RWQCB); treatment and monitoring, which involve extraction and monitoring wells, will continue under RWQCB oversight until contamination is reduced to an acceptable level.

This existing site does not represent and environmental risk to the proposed industrial use. However, existing extraction and monitoring wells will need to remain in operation until the cleanup and verification process is completed. At that time, removal of treatment equipment and well destruction will be required by the oversight agency. Mitigation Measure HAZ-3 described below will provide for the protection of these facilities until they are no longer needed.

Mitigation Measures:

HAZ-3. Planned industrial development in the vicinity of existing hazardous waste cleanup monitoring wells shall be restricted as required to permit the continuing inspection, maintenance and operation of groundwater extraction equipment until the operation is closed by the agency with jurisdiction.

As discussed above, a potentially hazardous waste disposal site on the adjoining Buzz Oates property was identified in 1982. The solid hazardous waste site contained raw materials associated with the production of glass. This site is contained within a defined area and is being monitored and remediated as required (AdvancedGeo Environmental 2017). This site would not involve a potential hazard to the project site or the proposed project.

The proposed project does involve the construction of a storm drainage detention basin along the southern portion of the site just north of the potentially hazardous waste site discussed above. Construction activities would be contained within the project site and would not directly affect the existing waste site. Neither construction workers nor the public would have access to this site, and therefore, the project would not create a potential hazard to the public or the environment. The project would have no effect associated with this site.

(e) (f) Aircraft Operations Effects

The project is not located within an Airport Influence Area and is therefore not required to comply with San Joaquin County Airport Land Use Compatibility Plan requirements. The project is located approximately 8 miles from the nearest public use airport. The construction and operation of the project would not create a safety hazard or impact people residing or working in the project area.

The project is located approximately one mile from the Sharpe Air Field, a private facility that no longer supports the use of aircraft. The project would not interfere with operations at this facility create a safety hazard for people residing or working in either the Air Field or the project area.

The project would have no effect related aircraft operations.

g) Emergency Response Effects

Direct public and emergency access to the project site is provided by Louise Avenue. Truck and other vehicle traffic to and from the project site would utilize Louise Avenue. Project-related traffic is not expected to substantially affect or interfere with the use of Louise Avenue for emergency response or evacuation purposes.

The project will be required to maintain adequate emergency vehicle access to individual uses developed within the project through the City's Site Plan Review and development review process. Coordination with the LMFD and Lathrop Police Department has been underway in the development of the project site plans shown in Chapter 2.0 and will continue as City review of the project proceeds. LMFD coordination includes the development of a Fire Access Site Analysis. Project design includes minimum 20-foot wide fire apparatus access roads and cul-de-sac turnarounds with a 41-foot radius. The approved project site plan or plans will require compliance with these and other San Joaquin County Fire Prevention Bureau standards (San Joaquin County Fire Prevention Bureau 2017). Emergency access to the project site, including access through security gates, would be arranged with the LMFD and maintained at all times. The project would adhere to the Lathrop General Plan Safety Element goals regarding medical and emergency access. The proposed project would not involve any known physically interference with an adopted emergency response plan or emergency evacuation plan. The project would not involve a significant effect in this area of concern.

h) Wildland Fire Hazards

The proposed project site is located in an area of urban development. The project site is not located within or adjacent to wildlands. Therefore, the project would not expose people or structures to significant wildland fire risk. The project would have no effect in this area of concern.

3.9 HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements?		√		
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)?				
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?		√		
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?		√		
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems?		√		
f) Otherwise substantially degrade water quality?				
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?				√
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?				√
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of a levee or dam?			√	
j) Inundation by seiche, tsunami, or mudflow?				√

NARRATIVE DISCUSSION

Environmental Setting

The project site is located in an urbanized area and does not have a direct connection to any rivers, streams, lakes, or other surface waters. The closest surface water is the San Joaquin River located west of Interstate 5, approximately 1.2 miles from the project site.

The Sacramento-San Joaquin River Delta is a unique and valuable resource and an integral part of California's water system. It is a tidal freshwater system, which receives runoff from over 40 percent of the State's area, including the Sacramento River and San Joaquin River watersheds. It covers 738,000 acres with hundreds of miles of waterways. The Delta serves as a water supply source for approximately 25 million people in California. The project site is located in the Secondary Zone designated by the Delta Protection Commission where land use development is permitted.

The City of Lathrop provides water service to approximately 6,100 residential, commercial, industrial, and institutional/governmental service connections of which 150 services are dedicated to irrigation. Potable water service to the project site is provided by the City. The City operates six municipal groundwater production wells which provide approximately 93% of the City's water supply. Groundwater use within the City over the last five years has been approximately 0.44 acre feet per year (AFY) and is projected to increase to 0.90 AFY by 2030. Current annual groundwater supply capacity is approx. 7,060 AFY. Approximately 17% of the City's total water supply is for industrial use (City of Lathrop 2015).

The project is located within the Eastern San Joaquin Sub-basin. Groundwater depths are estimated at less than 1,000 feet and groundwater generally slopes from south to north. Measurements of groundwater levels have historically showed a decline in ground water levels in the basin, however the City's groundwater has remained stable over the past two decades (City of Lathrop 2015). The groundwater level at the project site is approximately 15 feet below the ground surface. The project site, in the past, utilized its own private wells on the site for facility process water; the city provides water to the project site for domestic purposes only.

Groundwater quality concerns in the project region include saltwater intrusion from the overdraft of groundwater, and pollutants associated with runoff from agricultural fields. Groundwater quality has also been previously impacted by industrial land uses near the project site and have required the construction and operation of groundwater monitoring wells, as discussed in the previous section. Pollutants of concern in the area include nitrate, iron, chromium, manganese, arsenic, and bacteria contamination.

There are several groundwater monitoring wells located adjacent to the project site. The monitoring wells are located on the J.R. Simplot property just east of the proposed project. The wells were established by J.R. Simplot as part of a mitigation and monitoring program (See Section 3.8, Hazards and Hazardous Materials). Approximately seven of those wells are located near the southeastern portion of the project site and are currently slated for deconstruction and removal. Three of the seven wells are located in close proximity to the project's proposed detention basin but not located in contaminated areas (Arcadis 2017). J.R. Simplot will be required to obtain applicable well destruction permits from the San Joaquin County Environmental Health Department prior to well destruction.

The risks of flooding hazards in San Joaquin County are related to the failure of levees in the Delta, dam failures, and 100-year flood events. Levees within the City are owned and maintained by Reclamation Districts 17, 2107, and 2062. Levees providing flood protection to the City are designed to prevent flooding from the San Joaquin River. Based on maps prepared by the Federal Emergency Management Agency (FEMA) and the San Joaquin County Flood Zone Viewer, the project is located within FEMA Zone "X". These areas are outside the 500-year flood level and protected by levees from the 1% annual chance of a 100-year flood. In these areas, special regulations, planning, and building standards to protect public safety and allow discharge of floodwater.

In 2007, the State of California approved Senate Bill 5 (2007) and a series of related Senate and Assembly bills intended to set new flood protection standards for urban areas. The SB 5 establishes the State standard for flood protection in Central Valley urban areas as protection from the 200-year frequency flood. Under the SB 5 Bill, urban and urbanizing areas must be provided with 200-year flood protection no later than 2025. After July 2, 2016, new development in areas potentially exposed to 200-year flooding more than three feet deep is prohibited unless the local land use agency certifies that 200-year flood protection has been provided, or that "adequate progress" has

been made toward provision of 200-year flood protection by 2025. In the interim, cities and counties must certify that the SB 5 requirements are met, or that "adequate progress" is being made toward that standard. The City is actively pursuing compliance with the 2025 requirements and has incorporated SB 5 requirements into their General Plan. The project site is located in an urban area and is subject to SB requirements. Predicted 200-year flood depths on the project site range generally from 0-3 feet.

Dams in San Joaquin County are regulated by the California Division of Safety of Dams which provides oversight to the design, construction, and maintenance of dams to ensure safety. The Division requires dam owners to submit inundation maps to the State Office of Emergency Services and the Department of Water Resources for dams whose failure could result in loss of life or injury. There are 14 dams in San Joaquin County. The San Joaquin County Department of Emergency Services has created a Dam Failure Plan to address emergencies and evacuation if dam failure occurs. The closest dam to the project site is the Paradise Dam, located approximately 11 miles south of the project site in the City of Tracy.

Storm water drainage systems within the City of Lathrop are managed by the Public Works Department and consist of collection and trunk pipelines, detention basins, gutters, alleys, storm ditches, and pump stations. The proposed project is located within the Crossroads Business Park storm water drainage basin. The City's General Plan requires that new development projects address storm water issues and mitigate increased storm water runoff. Developments are required to construct storm water infrastructure such as curbs, gutters, and detention basins and provide drainage plans and Stormwater Pollution Prevention Plans prior to construction. The existing project site contains a stormwater drainage system and pump station, located in the southwestern portion of the site, and detains all of its stormwater on-site, which is then released slowly into the Crossroads Industrial Park storm drainage system, and pumped to the San Joaquin River.

Environmental Impacts and Mitigation Measures

a, f) Surface Water and Groundwater Quality

The project site is not located on or near streams or other surface waters. Therefore, the project would not directly impact surface waters.

The project would involve demolition of existing structures, grading and other construction-related disturbance. Soil disturbance would create the potential for runoff erosion and the potential to adversely affect surface water quality in the area. Operation of future industrial uses would involve increases in storm water runoff from increased rooftop and paved area, and the continuing potential for discharge of sediment and/or urban runoff pollutants to the City storm drainage system and the San Joaquin River. The federal Clean Water Act prohibits the discharge of pollutants to waters from point and non-point sources unless authorized by an NPDES permit.

As discussed, the project would be required to comply with the SWRCB Construction General Permit that covers all construction activities that disturb at least one acre of soil. Pursuant to the General Permit requirements, a Stormwater Pollution Prevention Program (SWPPP) would be prepared and construction Best Management Practices would be implemented to control soil erosion, runoff, and waste discharges, including methods to clean up contaminants if they are released. A dewatering plan would be included as part of the SWPPP which would include measures to prevent and minimize sediment and contaminants from entering the groundwater during excavation and construction. The SWPPP specifies maintenance and monitoring activities

needed to meet applicable water quality standards. A Notice of Intent (NOI) describing the status of the project and SWPPP must be filed with the SWRCB, which then issues a Waste Discharger's Identification Number. The following mitigation measure requires preparation of the SWPPP in accordance with the provisions of the Construction General Permit and the City's Storm Water Development Standards. These requirements would reduce potential construction impacts on surface water quality to a level that would be less than significant.

The proposed project includes storm drainage collection, storage and treatment features that would be required to provide project compliance with the City's adopted Storm Water Development Standards and its MS4 NPDES Permit. Storm water would be collected in an on-site system of storm drains and pump stations that would route storm drainage to the proposed detention basin, where it would be treated and detained until discharged to the City's storm drainage system. As a condition of project approval, the project would be required to obtain a MS4 permit from the City which would describe BMPs to reduce pollutant loads in stormwater discharges. The project would also be required to comply with the adopted Multi-Agency Post-Construction Stormwater Standards Manual and the City's Storm Water Development Standards which outline best management practices and procedures to protect water quality.

As a result, stormwater generated on the project site would not result in the violation of any water quality standards. Impacts to surface and groundwater quality resulting from project operation and construction would be less than significant.

Mitigation Measures:

HYDRO-1. The ODS shall prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) for the project in accordance with the Construction General Permit. The developer shall incorporate an Erosion Control Plan consistent with all applicable provisions of the SWPPP within the site development plans. The SWPPP shall be available on the construction site at all times. The developer shall file a Notice of Intent (NOI) with the State Water Resources Control Board prior to commencement of construction activity, and shall submit the SWRCB Waste Discharger's Identification Number (WDID) to the City prior to approval of development or grading plans.

HYDRO-2. The ODS shall obtain an MS4 permit from the City which would describe post-construction BMPs required to reduce pollutant loads in stormwater discharges to acceptable levels, including compliance with the adopted Multi-Agency Post-Construction Stormwater Standards Manual and the City's Storm Water Development Standards.

b) Groundwater Supplies

The project does not propose to drill any wells or extract additional groundwater; therefore, it would not directly affect groundwater supplies. The depth to groundwater on the project site is approximately 20 feet, so construction activities would not intercept the groundwater table.

The City would provide potable water to the project site for domestic purposes only. It is anticipated that future industrial uses of the site will involve largely warehousing and distribution, which would involve relatively minor water demands. The project would nonetheless result in an increased demand on the City water supply. The project is within the City's water service area, and

the City has adequate water supply to account for project-related needs. The project will be subject to the City's adopted water conservation standards, and the City's adopted Urban Water Management Plan. The project would not affect the City's ability to comply with the Sustainable Groundwater Management Act. Therefore, the groundwater impacts of the project would be less than significant.

The project proposes to collect on-site runoff in an on-site detention basin, where a portion of the runoff would percolate into the ground. Due to separation between the pond bottom and the groundwater, the percolation process is expected to remove potential pollutants from the runoff before it reaches the groundwater table. Therefore, the project would not adversely affect groundwater quality. Impacts on groundwater are considered less than significant.

c), (d), (e) Drainage, Erosion and Runoff

The project would include the development of a new storm drainage collection system consisting of pipelines, inlets, gutters and curbs in new development areas, which route all storm runoff to a new proposed detention pond located at the southern limits of the site. A new 10-inch pipeline would convey runoff from the detention facility to the south to a 48-inch connection to the City's stormwater system (See Section 3.17 Utilities and Service Systems).

The project will increase the area of impervious surfaces on the site, increase runoff volumes and modify drainage patterns on the site, but would not contribute to an increase in erosion or runoff. The detention basin would have a volume of 36.25 acre-feet. The project engineering plans indicate that the detention volume would be sufficient to accommodate the required runoff volume of 10- and 100-year, 24-hour storm event, which amounts to 15 acre-feet and 17.8 acre-feet, respectively.

As discussed previously, the project will be required to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) and to comply with the best management practices outlined in the City's Storm Water Development Standards Plan and Multi-Agency Post-Construction Stormwater Standards Manual, as described in Mitigation Measures HYDRO-1 and HYDRO-2. The project would not substantially increase the rate and amount of erosion or runoff, or cause on-site or off-site flooding. Impacts in this issue area would be less than significant with mitigation.

Mitigation Measures:

HYDRO-1 and HYDRO-2.

g, h) Housing and Structures within Flood Hazard Areas

There is no proposed residential development as part of the project, and the project site is not within the 100-year floodplain. Therefore, the project would not result in an impact in this issue area.

The project is not located within a 100-year flood hazard area and, therefore, would not impede or redirect flood flows. No impacts would occur in this area of concern.

i) Levee or Dam Failure Hazards

In the event of failure of levees along the San Joaquin River, the project site, which is located in FEMA Zone X, and within the 200-year flood as defined pursuant to SB 5, could be subject to flooding, and proposed industrial improvements on the site would be exposed to this flooding. However, the risk of exposure to 100-year flooding is less than 1% in any given year, and planned

improvements to the City's levee system is expected to comply with SB 5 requirements. Project construction and operation would have no effect on levees in the area and would not increase the potential for a levee failure to occur. Therefore, the project would not expose people or structures to significant risk of loss, injury, or death involving flooding due to levee failure.

The project area is located within potential inundation zones of New Melones and San Luis Dams were they to fail. However, the probability of failure of the dams and is considered low, and the project would involve no change to the existing dam failure hazard at the project site. Therefore, the project would not expose people or structures to significant risk of loss, injury, or death involving flooding due to dam failure.

j) Inundation by Seiche, Tsunami, or Mudflows

The project site is located in a flat area and is not near any large bodies of water. Therefore, the project would not be at risk of inundation caused by a seiche, tsunami, or mudflow. The project would have no impacts related to this issue.

3.10 LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?				√
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?				√
c) Conflict with any applicable habitat conservation plan or natural communities conservation plan?				√

NARRATIVE DISCUSSION

Environmental Setting

Land uses within the City of Lathrop include low, medium and high density residential, office, retail, industrial, commercial and agricultural/open space. Patterns of land use are governed by the Lathrop Comprehensive General Plan, as adopted in 1991 and amended in 2004. The project site is located within Sub-Plan Area #1 of the General Plan; Area #1 also includes the Crossroads Industrial Park which is located east of Interstate 5, north and west of the Union Pacific Railroad, and south of the project site. The existing, largely-developed industrial areas that comprise the project area are located within the city limits.

The project site is the location of the former LOF Pilkington North America float glass manufacturing facility that ceased operations in 2013. Nearly 800,000 sf of industrial building area remains on the site, which is in use by the Kraft-Heinz Company and Tesla. Following plant closure, the melting furnaces and the eastern portion of the manufacturing structures were demolished and removed. Inert waste piles and other debris were removed and portions of the site were graded in preparation for industrial re-use.

Kraft Heinz currently occupies most of the remaining facilities located in the southwestern portion of the LOF Pilkington site, including the approximately 780,000 sf warehouse and two Butler buildings, totaling approximately 62,000 sf. A 73,626-sf paved parking area along the south side of Louise Avenue is currently in use as a truck/trailer parking area. Paved parking areas between the existing buildings and the south boundary of the site are used by Tesla for vehicle storage. Other features of this existing developed area include a vehicle circulation and parking areas, fencing, landscaping, lighting and utility structures. an on-site sewage treatment plant, reservoir, storm drain pump station, and a PG&E substation. A railroad spur is located along the south line of the site. With the exception of the truck trailer parking area, these remaining structures and land uses are not included within the proposed project site subject to analysis in this document. These uses are considered existing entitled uses by the City. The existing truck trailer parking area is not operating under an existing permit; although this area is paved, authorization to continue this existing use of this area is considered a part of the proposed project.

The project site consists of largely-undeveloped lands that were connected with the LOF Pilkington use but are no longer in active use. Improvements in this area include railroad spurs connecting the existing uses with the nearby UPRR east of Howland Road, miscellaneous paved areas, lighting and underground utilities, and foundations for former industrial equipment. A 275-foot furnace stack, raw material silos, fuel and water storage tanks.

The site is currently designated Industrial in the Lathrop General Plan and zoned General Industrial (GI) by the City of Lathrop. General Industrial areas provide opportunities for large-scale industries requiring substantial area, with access to rail and freeway facilities. The term "general" refers to industrial operations which are relatively high in operational intensity and may require special conditions to mitigate potential adverse impacts (City of Lathrop 2004).

A relatively large residential area, Lathrop Village Homes, adjoins the north side of Louise Avenue and extends north to Lathrop Road. The neighborhood includes hundreds of single-family homes built primarily between 1963 and 1990. Most of the homes in Lathrop Village back up to Louise Avenue and are separated from the street by a masonry wall.

The Walnut Grove Mobile Home Park, zoned RM-3-Multi-Family Residential, is located northwest of the project site and west of Lathrop Village. The park includes approximately 50 mobile homes. A McDonald's restaurant is located immediately west of the project site along Louise Avenue and is zoned as CH-Highway Commercial. Remaining land to the west of the site is currently vacant land zoned GI-General Industrial.

Lands to the east and south of the site are already in industrial use or being developed for that purpose. Lands south of the project site are vacant land zoned as GI-General Industrial. A warehouse and distribution facility is currently being developed on this land by Buzz Oates Enterprises. The project site is bordered on the east by an existing agricultural chemical facility owned and operated by J.R. Simplot Company.

a) Division of Established Community

The project site is located on an industrialized site within an existing industrial area that has been designated and zoned by the City for industrial use. There are no homes or residential areas on or adjacent to the site. The project site is not located within a residential community and would not physically divide an established community. Therefore, the project would not impact established communities.

b) Consistency with Land Use Plans and Zoning

According to the Lathrop General Plan designates the project site, and the site is zoned, for industrial use. The proposed warehouse, distribution and manufacturing facilities are consistent with City land use designations and -zoning, subject to the approval of Site Plan Review. The project is also consistent with all of the industrial development policies outlined on page 4-A-12 of the City's Plan (City of Lathrop 2004). The project would not conflict with existing land use plans and zoning; there would be no impacts in this issue area.

c) Conflict with Habitat Conservation Plan

The project site is located within SJMSCP coverage areas, and the City is a party to SJMSCP implementation together with the County and other San Joaquin County municipalities. As a condition of approval, the project will be required to comply with the policies and mitigation strategies outlined in the Plan, including payment of fees and conformance to Incidental Take Minimization Measures specified by the administrator, as discussed in Section 3.4 Biological Resources. The project would not conflict with the SJMSCP.

3.11 MINERAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				√
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?				√

NARRATIVE DISCUSSION

Environmental Setting

The California Surface Mining and Reclamation Act of 1975 (SMARA) requires the State Geologist to classify land based on the known or inferred mineral resource potential of that land. The Mineral Land Classification process identifies lands that contain economically significant mineral deposits to ensure that the mineral resource potential of lands is considered in land-use planning. These lands are classified into Mineral Resource Zones (MRZs).

Based on review of the California Geological Survey Mineral Land Classification interactive map, the project site is located within MRZ-1, which indicates that no significant mineral deposits are present, or where there is little likelihood of their presence (California Geological Survey 2015).

According to the Lathrop General Plan, lands designated as MRZ-2 and MRZ-3 and contain mineral deposits of regional significance are located south of State Route 120 near the southeast end of the Stewart Tract. These areas are located approximately 1.5 miles southwest of the project site.

Oil, gas and geothermal resource development are regulated by the California Department of Conservation, Division of Oil, Gas and Geothermal Resources (DOGGR). Based on DOGGR on-line mapping, there are no oil or natural gas fields in the project vicinity (DOGGR 2018).

Environmental Impacts and Mitigation Measures

a) Availability of Mineral Resources of State Value

Significant mineral, oil and gas or geothermal resources are not located on the project site therefore, construction and operation of the project would not interfere with development of a known mineral resource, oil and gas or geothermal resources.

b) Availability of Mineral Resources of Local Value

There are no locally-important mineral resource recovery sites located on or near the proposed project site. Therefore, the development and operation of the project would not result in the loss of availability of locally important mineral resource recovery sites.

3.12 NOISE

Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				
b) Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?			√	
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			√	
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?		√		
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				√
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?				√

NARRATIVE DISCUSSION

Environmental Setting

The City of Lathrop General Plan incorporates the Noise Element of the San Joaquin County General Plan and also sets forth the City's goals and policies for noise abatement. The goals of the Noise Element of the General Plan are "to protect citizens from the harmful effects of exposure to excessive noise, and to protect the economic base of the City by preventing the encroachment of incompatible land uses near noise-producing roadways, industries, railroads, and other sources" (City of Lathrop 2004).

Noise is often described as unwanted sound, which is any pressure variation in air that the human ear can detect. Since measuring sound by pressure would require a large and awkward range of numbers, the decibel (dB) scale was devised. This scale is typically adjusted for perception of loudness by the standardized A-weighting network, which provides a strong correlation between A-weighted sound levels (expressed as dBA) and community noise.

Background noise or ambient noise is defined as the all-encompassing noise level associated with a given noise environment. A common statistical tool to measure the ambient noise level is the average, or equivalent, sound level (L_{eq}), which corresponds to a steady-state, dBA sound level containing the same total energy as a time-varying signal over a given time period (usually one hour). The L_{eq} shows very good correlation with community response to noise, and it is the basis for other noise descriptors such as the Day-Night Average Sound Level (L_{dn}). The L_{dn} represents an average sound exposure over a 24-hour period, with noise occurring between 10:00 p.m. and

7:00 a.m. weighted more heavily to account for the greater sensitivity of people to noise during those times.

Existing Noise Environment

Existing industrial operations on the project site consist of warehousing of Kraft-Heinz products, which occurs primarily within existing buildings. These activities do not result in substantial off-site noise. Surrounding land uses to the east south and west are industrial or vacant and planned for industrial development and are not noise-sensitive. The adjacent lands to the south are under development for industrial purposes and generate some existing construction noise; the adjacent is proposed for warehousing and distribution use and is not expected to generate significant noise over the long term. The existing residential neighborhood to the north of Louise Avenue, and the J.R. Simplot operations to the east are not significant noise sources. The Union Pacific railroad east of the project site generates substantial noise during train pass-bys.

The primary existing noise source in the project area is east-west vehicle traffic on Louise Avenue, although vehicle traffic on Interstate 5, and to a lesser degree Harlan Road, to the west are prominent background noise sources. The South Lathrop Specific Plan EIR calculated traffic noise contours for the segment of Louise Avenue east and west of McKinley Avenue. Based on this data, and use of the FHWA Traffic Noise Model reported later in this section, existing traffic noise levels along Louise Avenue likely exceed 65 dB in the adjacent residential areas. The distances to the predicted 70, 65 and 60 dB noise contours from the centerline of Louise Avenue are as follows (De Novo Planning Group 2013):

Noise Level	Distance
70 dB	37 feet
65 dB	79 feet
60 dB	170 feet

According to the General Plan, exterior noise level performance standards for general or light industrial operations is 65-75 dB during daytime and nighttime hours in urban areas. Existing traffic noise generated by Louise Avenue would exceed 65 dB in the immediate vicinity of Louise Avenue and would not exceed 75 dB anywhere on the project site.

Railroad operations generate high, relatively brief, intermittent noise events. Railroad operations generate a 24-hour day/night average exterior noise level of 72 dB at a distance of 50 feet of the railroad right-of-way centerline. Train noise levels for a single event can be expected to range between 90-100 dB (City of Lathrop 2004). The City does not have jurisdiction or control over noise levels generated by trains.

Railroad activity on the UPRR tracks east of the project site produce substantial noise during train pass-bys. During one noise survey conducted for the South Lathrop Specific Plan EIR, 10 train events occurring during the daytime (7:00 am – 10:00 pm) and five train events occurred at nighttime (De Novo Planning Group 2013). The noise contours for the UPRR tracks were determined to be as follows:

Noise Level	Distance
70 dB	46 feet
65 dB	100 feet
60 dB	215 feet

Except for its eastern extremes the project site is more than 500 feet west of the railroad, and railroad noise at the site would therefore be less than 60 dB.

Certain land uses such as schools, parks, hospitals, and auditoriums are considered more sensitive to ambient noise levels than others due to noise exposure and the types of activities involved in these areas. These land uses often have more stringent noise standards. The project site is located in an existing industrial and commercial area and adjacent properties are not considered sensitive noise receptors. The closest sensitive noise receptor to the project is the Lathrop Villages residential neighborhood and Libby Lane Park located north of the project site. Table 3-5 shows the City's noise standards, which sets limits for community noise exposure by land use type.

Table 3-5
Noise Level Performance Standards for Noise Sources

	Nighttime 10:00 PM to 7:00 AM			**Daytime 7:00 AM to 10:00 PM**		
Land Use	Rural/ Suburban	Suburban	Urban	Rural/ Suburban	Suburban	Urban
One or two-family residential	40	45	50	50	55	60
Multi-family residential	45	50	55	50	55	60
Public Space	50	55	60	50	55	60
Limited Commercial	N/A	55	N/A	N/A	609	N/A
Commercial	N/A	60	N/A	N/A	65	N/A
Light Industrial	N/A	70	N/A	N/A	70	N/A
Heavy Industrial	N/A	75	N/A	N/A	75	N/A

Source: City of Lathrop General Plan, Noise Element

The Lathrop Municipal Code, Section 8.20.110, prohibits outside construction work within 500 feet of a residential area between 10:00 pm and 7:00 am weekdays, or between 11:00 pm and 9:00 am Fridays, Saturdays, and legal holidays, unless a permit is obtained from the City.

The San Joaquin County Airport Land Use Commission (ALUC) has jurisdiction over what types of developments are permitted near airport facilities. Development projects that are located within an airport influence area must comply with San Joaquin County's Airport Land Use Compatibility Plan. The plan helps protect the public from the adverse effects of airport noise and to ensure that no structures or activities encroach upon or adversely affect the use of navigable air space (San Joaquin County 2018). Based on review by the ALUC, the proposed project site is not located within an airport influence area (Yokoyama 2018). The closest airport is the Stockton Metropolitan Airport, located approximately eight miles from the project site. The project site and vicinity are not subject to noise impacts from the airport.

Environmental Impacts and Mitigation Measures

a) Exposure to Noise Levels in Excess of Standards

Sources of on-site noise generated by the project would come from vehicles, trucks, and materials handling equipment and ventilation systems. The performance standard for noise levels from industrial and manufacturing facilities in the project area is between 65-75 dB CNEL. A noise level

of 65-75 dB is not uncommon with activities associated with industrial land uses and is not anticipated to result in adverse noise effects on surrounding land uses.

The project site is located adjacent to similar industrial and commercial land uses and noise sources. Day to day operational activities that would occur within the proposed industrial and manufacturing facilities would not generate noise exceeding 75 dB at the project boundary and would be consistent with the existing industrial setting and the standards and policies outlined in the City's General Plan Noise Element. The noise environment would also be consistent with the recommendation of the California Office of Noise Control and the Noise Element described in the San Joaquin County General Plan.

The project would not be expected to result in significant noise levels within the developed residential areas north of Louise Avenue. Operational noise occurring in the northernmost portion of the site would be attenuated by distance between the noise source and the nearest residential receptor. The existing masonry wall along the north side of Louise Avenue would further reduce any potential noise effect in these areas. The proposed project would not expose persons to noise levels in excess of City noise standards, and noise impacts in this area of concern would be less than significant.

b) Exposure to Ground-borne Vibration or Noise

Ground-borne vibration is not a common environmental problem. It is typically associated with major transportation facilities, although it is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. Some common sources of ground-borne vibration are trains, buses on rough roads, and construction activities such as blasting, pile-driving and operating heavy earth-moving equipment.

The primary potential sources of ground vibration associated with the project would be from the use of construction and demolition equipment, which would be confined to the construction period. The potential for off-site vibration effects would depend on the type of construction equipment used, the duration of use and the distance to sensitive receptors. Sensitive receptors in the project vicinity would be residences located in the Lathrop Village subdivision to the north. Lathrop Village is separated from the project site by the 100-foot wide Louise Avenue right-of-way.

Ground-borne vibration would be most associated with use of pile drivers, drill rigs, and blasting, none of which are anticipated to be used in conjunction with project construction. Project construction would likely involve such equipment such as bulldozers, graders, excavators, and backhoes. Use of such conventional equipment would not be anticipated to cause perceptible ground vibration in the Lathrop Village neighborhood, even if operated in the immediate vicinity of Louise Avenue.

The applicant has identified potential demolition methods for large structures, including furnace stack, hoppers and storage tanks, as likely to involve modified conventional equipment that gradually demolishes these facilities in place (see Chapter 2.0, Demolition) rather than using explosives to bring the structure to ground level. As a result, impacts from demolition activity, and ground vibration impacts from construction generally, are expected to be less than significant.

c) Permanent Increase in Ambient Noise

The project proposes development of new industrial uses, consisting of a mix of an undefined mix of warehousing, distribution and manufacturing on the vacant portions of the existing industrial

site. Based on the proposed site plans (Figures 2-3 and 2-4), it appears that the primary future industrial uses will be located within proposed structures. These uses will also, however, involve on-site vehicle and truck circulation as well as use of materials handling equipment such as fork lifts. As a result, future uses of the site would result in new on-site noise typical of industrial uses in the vicinity.

New on-site noise from industrial operations would be of little or no consequence to the existing and planned industrial uses east, south and west of the site. Proposed new uses would be separated from the Lathrop Village by proposed industrial structures along Louise Avenue, and by distance, including the approximately 100-foot Louise Avenue right-of-way, such that there would be no substantial adverse noise effect on this area.

As discussed in more detail in Section 3.16, the project will generate an increase in traffic, and an increase traffic noise, along Louise Avenue at and west of the site. Land uses adjacent to the north side of Louise Avenue at and west of the site include the Lathrop Village residential area, which is partially protected from noise by an existing masonry noise barrier wall.

The potential increase in traffic noise along Louise Avenue resulting from the proposed project was estimated using the Federal Highway Administration Noise Prediction Model (FHWA-RD-77-108). Traffic data inputs were derived the project traffic report prepared by Crane Transportation Group (Appendix D). Noise levels were estimated for existing and cumulative baseline traffic conditions and compared to estimated noise levels for baseline plus project conditions. The analysis indicated that project generated traffic would not cause substantial increases in traffic noise generated along Louise Avenue, under either Existing or Cumulative conditions. Under Existing conditions, addition of estimated project traffic would cause traffic-generated noise to increase by less than 0.5 dB. Under Cumulative conditions, addition of estimated project traffic would cause traffic-generated noise to increase by an estimated 0.2 dB.

The highest estimated traffic noise increase would amount to 0.4 dB Ldn. The City of Lathrop considers an increase in noise of 3.0 dB or more a potentially significant impact (City of Lathrop 2010). Since none of the roadway segments would experience a noise increase even approaching the significance threshold, project-generated traffic would not have a significant noise effect.

Residential uses along the north side of Louise Avenue are protected by barrier walls that would reduce existing and future noise levels by at least 5 dB. Other affected roadway segments are adjacent mostly to lands zoned for light industrial uses, which as indicated in Table 3-5 above have allowable exposure to noise levels up to 70 dB. Some segments are adjacent to the service commercial zone, which is intended primarily for establishments engaged in servicing equipment, materials and products. As such, they are different from retail commercial uses, which have a lower allowable exposure level, and more similar to light industrial uses. Impacts of permanent noise level increases from project traffic are considered less than significant.

d) Temporary or Periodic Increase in Ambient Noise

Construction and demolition activities would generate noise intermittently that could be audible in areas adjacent to and near the site. Construction-related noise levels generally fluctuate depending on the construction phase, equipment being used, duration of use, distance between noise source and receptor, and presence or absence of noise barriers (San Joaquin County 2014). The dominant source of noise would likely occur from the use of backhoes, excavators, cranes, and graders. Noise levels from these types of equipment range from 55 to 95 dB at a distance of 50 feet. (Federal

Highways Administration 2006). It is not anticipated that project construction will involve pile driving, blasting or other major noise sources.

Noise sensitive receptors near the project site would, at times, experience elevated noise levels during construction activities, in particular construction in the northernmost portion of the site. However, construction activities would be restricted to daylight hours which would reduce impacts during noise sensitive nighttime hours. The closest noise receptor to the project are the homes located north of the project along Louise Avenue. The existing noise wall along the north side of Louise Avenue would further reduce noise exposure levels. The homes along Louise Avenue would provide a buffer to noise impacts for those visiting Libby Lane Park.

Construction activity would be confined within the parameters and provisions outlined in the City's Municipal Code Standards and the City's Department of Public Works, Design and Construction Standards. Therefore, construction generated noise would not result in a substantial temporary increase in ambient noise levels, and impacts would be less than significant.

e, f) Aircraft Operations Noise

The proposed project is located approximately eight miles from the nearest airport and is not located within an Airport Influence Area or within mapped noise contours for that facility. Therefore, aircraft noise associated with this facility would not exceed Lathrop noise standards, and the San Joaquin County's Airport Land Use Compatibility Plan would not apply to the proposed project. The project would have no impact on aircraft operations noise or exposure to such noise.

3.13 POPULATION AND HOUSING

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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)?			√	
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				√
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				√

NARRATIVE DISCUSSION

Environmental Setting

The California Department of Finance population estimates for the City of Lathrop as of January 1, 2017 is 23,110. The City has experienced a 22.5% population increase since 2010 and a 4.5% increase since 2016. The estimated number of housing units in the City of Lathrop is 6,313 units as of 2017. (California Department of Finance 2017). Lathrop General Plan population assumptions, the ongoing pace of residential development and the availability of land approved for such development indicate that the City will continue to grow for the foreseeable future.

The closest residential area to the project is Lathrop Village, a largely single family residential development also known as "Old Lathrop," that includes hundreds of housing units. Lathrop Village extends from the north side of Louise Avenue a mile to Lathrop Road, and beyond. Most of Lathrop Village is separated from Louise Avenue by a six-foot masonry wall. The Walnut Grove Mobile Home Park is located north of Louise Avenue near the northwest corner of the project site.

Environmental Impacts and Mitigation Measures

a) Population Growth Inducement

The project would not involve the construction of new housing units and would, therefore, have no direct impact on population growth. The project would not involve the demolition of housing units and therefore no adverse effect on existing population.

The project would involve new employment and would attract new employees, which would likely include existing residents of the City of Lathrop or Manteca area as well as employees that commute or relocate to the City from elsewhere in the County and region. Any potential increase in Lathrop residents resulting from the project is expected to be minimal and would not involve substantial population growth or result in an increased demand for housing that couldn't be met by existing housing or planned housing development. This impact would be less than significant.

b, c) Displacement of Housing or People

The existing project site and the proposed project does not contain any existing residences or housing units. Project development would therefore not result in displacement of people or housing or require replacement housing. The project would have no effect in this issue area.

3.14 PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Fire protection?			√	
b) Police protection?			√	
c) Schools?			√	
d) Parks?			√	
e) Other public facilities?			√	

NARRATIVE DISCUSSION

Environmental Setting

Fire protection services within the City of Lathrop are provided by the Lathrop-Manteca Fire Protection District. The Fire District provides medical emergency response, urban search and rescue, river rescue, and fire prevention services. The fire district operates four fire stations and covers approximately 30,000 square miles and serves over 30,000 residents. District staff is comprised of 33 uniformed full-time personnel and 20 reserve personnel (City of Lathrop 2016).

There are two fire stations each located approximately 1.2 miles from the project, fire station #31 and fire station #34. According to the Lathrop Manteca Fire Department (LMFD) Incident and Training Report, average emergency response times in 2016 was 4.23 minutes from fire station 31 and 5.29 minutes from station 34 (City of Lathrop, Lathrop Manteca Fire Department 2016). There are several existing fire service connections strategically located throughout the project site that provide access to fire suppression water supply in case of a fire emergency (See Section 3.17 Utilities and Service Systems).

The San Joaquin County Fire Chiefs' Association's Fire Apparatus Access Road Standard contains specific requirements for fire access routes such as roadway and driveway widths and turning radii so that fire trucks and personnel can adequately and safely access the site in the event of an emergency. The applicant has provided an initial Site Fire Access Analysis to address these requirements.

The Lathrop Police Department provides police services through a community partnership with the San Joaquin County Sheriff's Department. The Police Department is located on East 7th street, approximately 1.1 miles from the project site. The Department currently staffs approximately 26

officers. The current city-wide Priority 1 average response time is 4 minutes; Priority 1 calls involve a threat posed to life or a crime of violence (City of Lathrop 2016).

The project site is located within the Manteca Unified School District. The District serves the communities of Manteca, Lathrop, Stockton, and French Camp and includes kindergarten through 12th grade. It operates 19 elementary schools, four high schools, one continuation school, and two community day schools. Student enrollment in all district schools in 2016-2017 is 23,441 students. The closest school to the project site is Lathrop Elementary School, located approximately 0.8 miles from the project site.

The City of Lathrop's Parks and Recreation Department manages 35 parks and 23 indoor and outdoor recreational facilities and community centers. The closest recreation area to the project site is Libby Lane Park located approximately 0.1 miles north of the project site between Warfield Road and Cambridge Drive in the Lathrop Village residential development. Libby Lane park is considered a mini park which are designed to provide recreational and aesthetic benefits in areas of high population density.

Environmental Impacts and Mitigation Measures

a) Fire Protection Impacts

An incremental increase in fires, accidents is inherent with urban expansion. Therefore, proposed industrial development and associated activity would result in an incremental increase in demand for fire protection and emergency services.

The project would include expansion of existing fire suppression water supply system service lines to serve areas of new development. New water supply facilities would be constructed in accordance with City and state codes and standards, which include specific fire protection and safety requirements. Consistency with applicable design standards would be maintained through routine LMFD participation in the project review and design process and associated review of project design and improvement plans. LMFD would also conduct regular inspections to enforce fire protection and building codes and safety standards for the construction of new buildings.

The proposed project has prepared an initial Site Fire Access Analysis, which will be subject to further review and approval by the City and LMFD. Final site plans and associated circulation will be required to provide for adequate access for fire personnel and equipment. The project is not anticipated to affect emergency response times to on-site or off-site emergencies. Therefore, impacts on fire protection facilities and services would be less than significant.

b) Police Protection Impacts

The Lathrop Police Department currently provides police services to the project site, which would be extended to new industrial development on the site. New development would include updated access controls, fencing and monitoring. As a result, the proposed project is not expected to introduce substantial amounts of new crime or violence to the area. The proposed project is therefore not expected to result in the need for any substantial increase in police services beyond what is already available. The project is not expected to affect response times or require the construction of any additional police facilities. Project impacts on police protection services would be less than significant.

c) Schools Impacts

Demand for school services is typically generated by the addition of residents through new housing. The project does not propose new housing, so it would have no direct impact on school demand. Section 3.13, Population and Housing, discusses potential indirect impacts of the project on population growth and considered such impacts less than significant.

New development on the project site over time would involve temporary increases in local construction employment, and operation of new industrial uses would involve additional long-term employment. Changes in employment are not estimated as the exact nature of new industrial uses to be established on the site is not defined and will be dependent on market forces. Additionally, new employees would be expected to be drawn from residents of the City of Lathrop, surrounding areas and San Joaquin County, or commute from more distant areas rather than relocating to the City. As a result, any employment increases resulting from the project are unlikely to result in substantial additions of new students to the area or any substantial impact on school capacity. As a result, the project would not require new school facilities or require substantial alteration of existing schools requiring environmental review. Project impacts on schools would be less than significant.

e) Parks and Other Public Facilities Impacts

Section 3.13 Population and Housing, describes the potential population impacts of the project and determines that the project would not cause any substantial increase in population. Therefore, the project should not result in any additional demand for public facilities such as libraries or community centers. The project would not require the addition or expansion of park facilities. As a result, impacts on parks and other public facilities would be less than significant.

3.15 RECREATION

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			√	
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?			√	

NARRATIVE DISCUSSION

Environmental Setting

City parks and recreation facilities are described in Section 3.14 Public Services. In the unincorporated area, San Joaquin County manages 10 regional parks. In the Lathrop vicinity, Dos Reis Regional Park is located west of the project site, between Interstate 5 and adjacent to the San Joaquin River; Dos Reis is the closest regional park to the project site.

Environmental Impacts and Mitigation Measures

a) Increased Use of Existing Recreational Facilities

As discussed in the previous section, the project does not include any residential development or any other elements that would cause a substantial increase in population and demand for parks and recreation. The project would not result in substantial increases in use, changes in access or physical deterioration of any nearby parks or recreational facilities.

b) Recreational Improvements Involving Environmental Impacts

The project does not involve, and would not require through increases in recreational demand, the construction, operation, or expansion of recreational facilities and therefore not result in any adverse physical effect on the environment.

3.16 TRANSPORTATION/TRAFFIC

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?			√	
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?			√	

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?			√	
d) Substantially increase hazards to a design feature (e g., sharp curves or dangerous intersections) or incompatible uses (e g, farm equipment)?			√	
e) Result in inadequate emergency access?			√	
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?			√	

NARRATIVE DISCUSSION

A traffic impact report was prepared in conjunction with the preparation of this IS/MND by Crane Transportation Group. The Crane report considers the potential traffic impacts of the project under existing and cumulative conditions on roadways and intersections in the vicinity of the project. The report also considers internal circulation and on-site parking supply as well as pedestrian, bike, transit and other transportation impact. The consistency of the project with San Joaquin County transportation plans were also analyzed and are discussed in this section. A copy of the Crane report is shown in Appendix D.

The traffic analysis was based on slightly higher development quantities than are currently proposed. The land use assumptions used in the traffic study were as follows:

High cube transload and short-term storage warehouse	667,770 sf (62%)
Conventional warehouse	140,017 sf (13%)
Light industrial	269,263 sf. (25%)
Total	1,077,050 sf

The Crane report considered the potential traffic impacts of the project during weekday AM and PM peak hours, under existing and cumulative conditions at the following locations (Figure 3-1):

Louise Avenue-River Islands Parkway/I-5 Southbound Ramps intersection
Louise Avenue/I-5 Northbound Ramps intersection
Louise Avenue/New Harlan Road intersection
Louise Avenue/Cambridge Drive
Louise Avenue/Howland Road-5th Street
Louise Avenue/McKinley Avenue
Yosemite Avenue (Guthmiller Road)/SR 120 Eastbound Ramps intersection
Yosemite Avenue (Guthmiller Road)/SR 120 Westbound Ramps intersection
Yosemite Avenue/D'Arcy Parkway intersection
Yosemite Avenue/McKinley Avenue intersection
D'Arcy Parkway/Howland Road intersection

Baseline traffic conditions under the Existing and Cumulative scenarios were established by Crane Transportation Group in consultation with the Lathrop City Engineer. Trip rates from the Institute

of Transportation Engineers Trip Generation Manual, 10th Edition, by the Institute of Transportation Engineers, 2017 were utilized for all project trip generation projections. The distribution of project-generated traffic to the local roadway system based upon new traffic counts as well as data collected in recent analyses. The analysis assumptions are discussed in more detail in the Crane report.

Transportation engineers and planners commonly use a grading system called "level of service" (LOS) to measure and describe the operational status of the local roadway network. LOS is a description of the quality of a roadway facility's operation, ranging from LOS A (indicating free-flow traffic conditions with little or no delay) to LOS F (representing oversaturated conditions where traffic flows exceed design capacity, resulting in long queues and delays). This system was used in the analysis of the traffic impacts of the project.

Intersections, rather than roadway segments between intersections, are almost always the capacity controlling locations for any circulation system. At signalized intersections, the year 2017 6th Edition Highway Capacity Manual (Transportation Research Board, National Research Council) methodology was utilized. With this methodology, operations were defined in the Crane report by the LOS and average control delay per vehicle (measured in seconds) for the entire intersection. This includes delay associated with deceleration, acceleration, stopping, and moving up in the queue. The traffic analysis methodology accounted for the contributions of higher truck traffic percentage influences on LOS.

For unsignalized (all-way stop-controlled and side-street stop- controlled) intersections, the analysis methodology was drawn from the same source but utilizes different metrics. For side-street stop-controlled intersections, operations are defined by the level of service and average control delay per vehicle (measured in seconds), with delay reported for the stop sign controlled approaches or turn movements. For all-way stop-controlled intersections, operations are defined by the average control delay for the entire intersection (measured in seconds per vehicle). More detailed information on these methodologies is provided in the Crane report.

In the City of Lathrop, LOS D is the poorest acceptable overall operation for signalized intersections. At unsignalized Intersections LOS E is the poorest acceptable operation level.

Environmental Setting

Roads and Intersections

Interstate 5 (I-5) is a six-lane freeway located about half a mile to the west of the project site. It extends northerly to Stockton, Sacramento and to the Oregon border; and southerly to a connection with I-205 (the most direct freeway connection to the San Francisco Bay Area) as well as Los Angeles and other southern California cities. I-5 has a tight diamond interchange with Louise Avenue, with both ramp intersections being signal controlled.

State Route 120 (SR 120) is a four-lane freeway in the project area located about a mile south of the project site. It extends easterly from I-5 to a connection with the State Route 99 freeway in Manteca, and then further east to Yosemite National Park. In the project area, it has a tight diamond interchange with Guthmiller Road/Yosemite Avenue (referred to as the Yosemite Avenue interchange in this report) as well as interchanges to the east in the City of Manteca at Airport Way,

Union Road and Main Street. The SR 120 single lane off-ramps at Yosemite Avenue are stop sign controlled.

Louise Avenue is a four-lane arterial roadway in the project area extending east from its interchange with I-5 into the City of Manteca. To the west of I-5 it is named River Islands Parkway. In the project area, it has signalized intersections with the I-5 Ramps, New Harlan Road, Cambridge Drive, Howland Road-5th Street and McKinley Avenue. The posted speed limit adjacent to the site is 50 miles per hour and on-street parking is prohibited. Louise Avenue is lined by curb, gutter and a dirt walkway along the south (project frontage) side of the street, and by curb, gutter and sidewalk along the north side of the street.

Yosemite Avenue is primarily a two-lane arterial roadway in the City of Lathrop extending easterly from Guthmiller Road into the City of Manteca. It has been widened to four lanes in the immediate vicinity of its signalized "Tee" intersection with D'Arcy Parkway. About half a mile to the east, it has all-way-stop control at McKinley Avenue.

Guthmiller Avenue is a two-lane facility extending south from Yosemite Avenue to and south of its tight diamond interchange with the SR 120 freeway. All on- and of-ramps are single lane, as are all Guthmiller Road approach lanes to the freeway on-ramps. For reference purposes, the Guthmiller Avenue interchange with the SR 120 freeway is referred to as the Yosemite interchange since Caltrans uses this designation.

D'Arcy Parkway is an industrial street a little more than a mile in length extending easterly from its Tee intersection with the Harlan Road through the Crossroads industrial area to a signalized "Tee" intersection with Yosemite Avenue. It has two travel lanes from Harlan Road to about Howland Road and four lanes east of this point.

Harlan Road is a 2- to 4-lane street running parallel to and just east of I-5 through the City of Lathrop. It has four travel lanes south of its signalized intersection with Louise Avenue past the D'Arcy Parkway intersection. It ends almost two thirds of a mile south of D'Arcy Parkway.

Cambridge Drive is a two-lane collector street extending north from Louise Avenue through a residential area. Curb, gutter and sidewalk line both sides of the street and on-street parking is allowed.

Existing Traffic Operations Without the Project

The Crane report determined that all analysis intersections are currently operating at acceptable levels of service during both the weekday AM and PM peak traffic hours (Appendix D). The signalized Louise Avenue intersections with the I-5 ramps are both operating at an acceptable LOS C during both peak hours, while the Yosemite Avenue intersections with the stop sign controlled SR 120 ramps are operating at an acceptable LOS B to D during both peak hours. Finally, the poorest, but still acceptable LOS D operation occurs at the Louise Avenue/McKinley Avenue intersection during both the AM and PM peak hours as well as at the Louise Avenue/Harlan Road and Yosemite Avenue/McKinley Avenue intersections during the PM peak hour.

The Synchro software program was utilized to obtain 95th percentile peak hour vehicle queuing at the I-5/Louise Avenue intersections for comparison to available storage. Predicted queueing is within available storage at all of the analyzed locations.

The need for signalization of unsignalized intersections is judged using a methodology contained in the California Manual on Uniform Traffic Control Devices, 2014, Revision 3). This methodology is used to determine whether "warrants" exist for signalization. Warrant 3, the peak hour volume warrant, is often used as an initial check of signalization needs since peak hour volume data is typically available and this warrant is usually the first one to be met. Applying the MUTCD methodology, the Crane report found that currently all unsignalized analysis intersections have AM and PM peak hour volumes lower than Caltrans Urban Signal Warrant #3 volume criteria levels.

Transit

San Joaquin Regional Transit District (SJRTD) Route 90 runs along Louise Avenue between I-5 and the 5th Street-Howland Road intersection. Route 90 extends between Stockton and Tracy with 8 to 9 runs per day in each direction. The closest bus stop to the project site is at the Louise Avenue/Cambridge Drive intersection where there are bus stops and shelters on each side of Louise Avenue. Also, the Altamont Commuter Express (ACE) commuter train has a station along Yosemite Avenue east of McKinley Avenue about 2.25 miles from the project site. Trains run between Stockton and San Jose: 4 westbound in the morning (leaving Lathrop between 4:39 AM and 7:24 AM), and 4 eastbound in the afternoon (arriving in Lathrop between 5:23 PM and 8:26 PM.

Pedestrian and Bikeways

There is an unpaved pathway along the project frontage on the south side of Louise Avenue from Howland Avenue to just east of Harlan Avenue, where it connects to the existing sidewalk along the McDonald's restaurant property. There is also a sidewalk along the north side of Louise Avenue between the Howland-5th and Harlan Road intersections as well as along Louise Avenue from Harlan Road through its interchange with I-5. There are also sidewalks along both sides of Warfield Road, Cambridge Drive and 5th Street north of Louise Avenue (Figure 3-2).

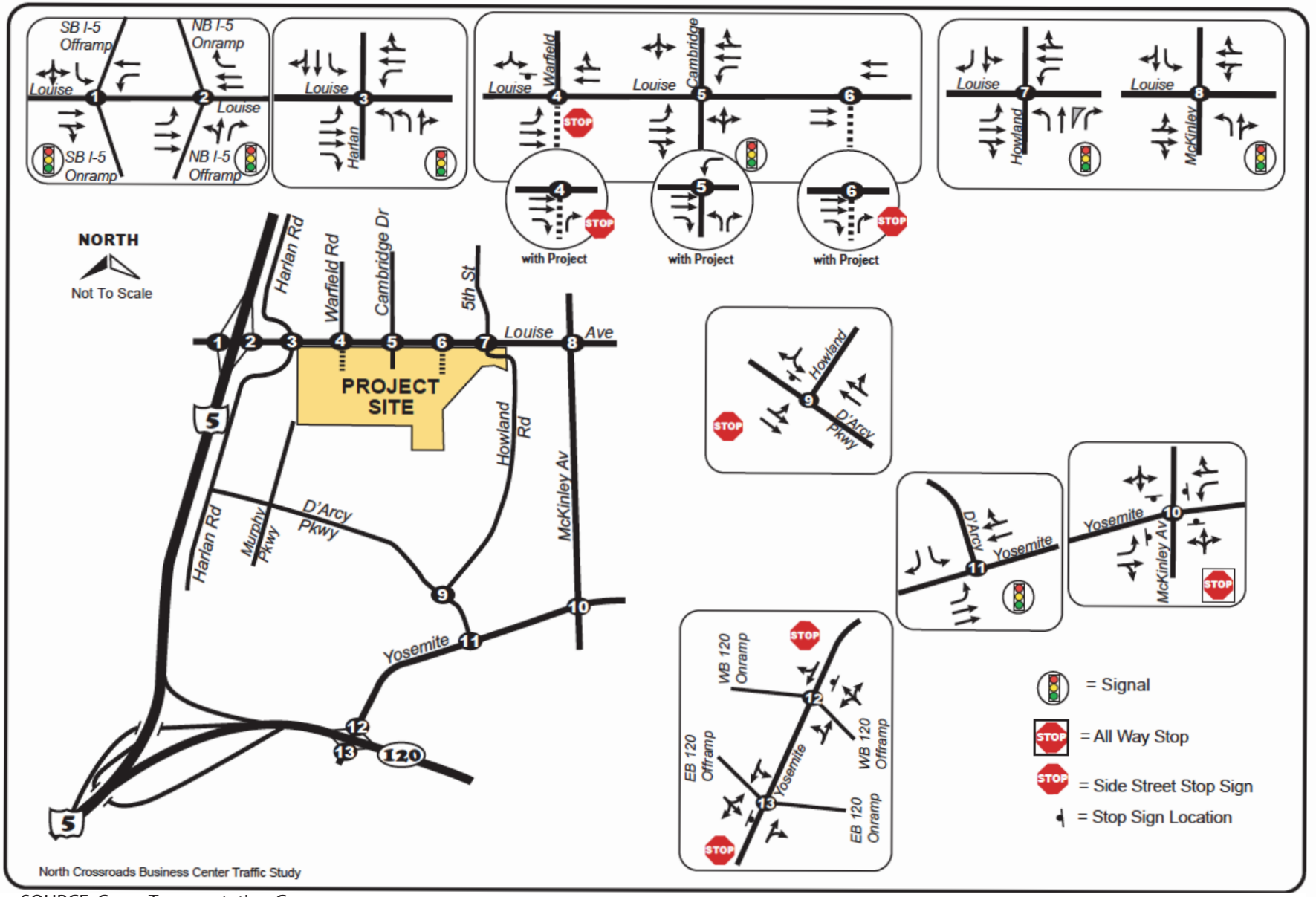
There are no Class I, II or III bicycle paths, lanes or designated streets within the Crossroads industrial area or along Yosemite Avenue or Louise Avenue (Appendix D, see Figure 8). Only a minimal number of bicycle riders were observed during several field surveys in the area. However, the San Joaquin County Regional Bicycle Master Plan shows a future Class I path along the western section of Yosemite Avenue and a Class III (signed) designation of the eastern section of Yosemite Avenue leading into Manteca for some unspecified time in the future. The City of Lathrop Bicycle Transportation Plan (1995) also shows future bike routes along Harlan Road and D'Arcy Parkway.

Environmental Impacts and Mitigation Measures

a) Consistency with Applicable Plans, Ordinances and Policies

The project does not recommend or incorporate any off-site parking. The proposed on-site vehicle, truck, and bicycle parking would be adequate to serve the site and will comply with the City's zoning standards.

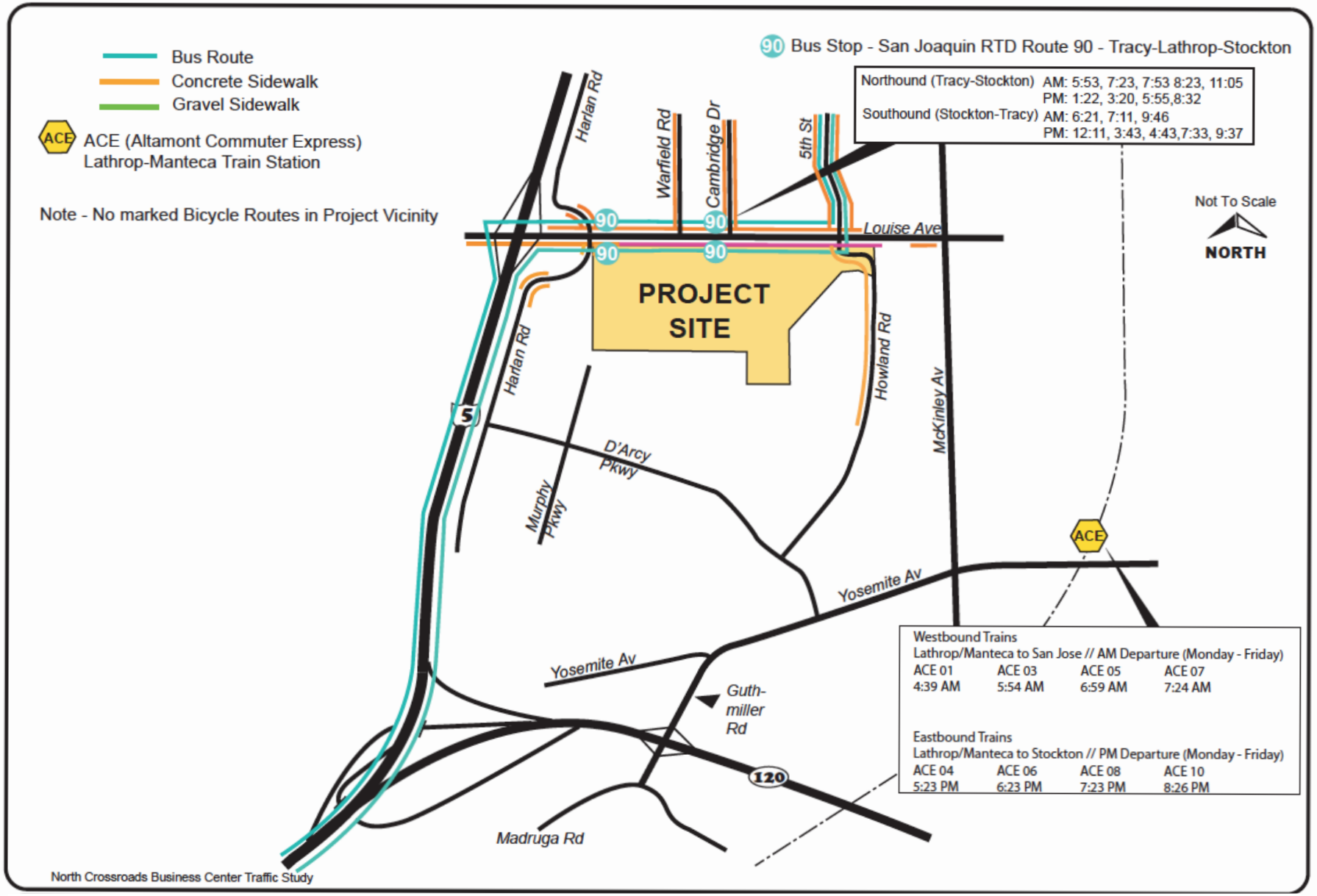
The Crane report calculates that the project would generate about 2,284 daily two-way trips on a weekday, with about 155 inbound and 34 outbound AM peak hour trips and about 41 inbound and 144 outbound PM peak hour trips distributed over the three proposed access points. The addition of project traffic would result in a significant impact if:



SOURCE: Crane Transportation Group

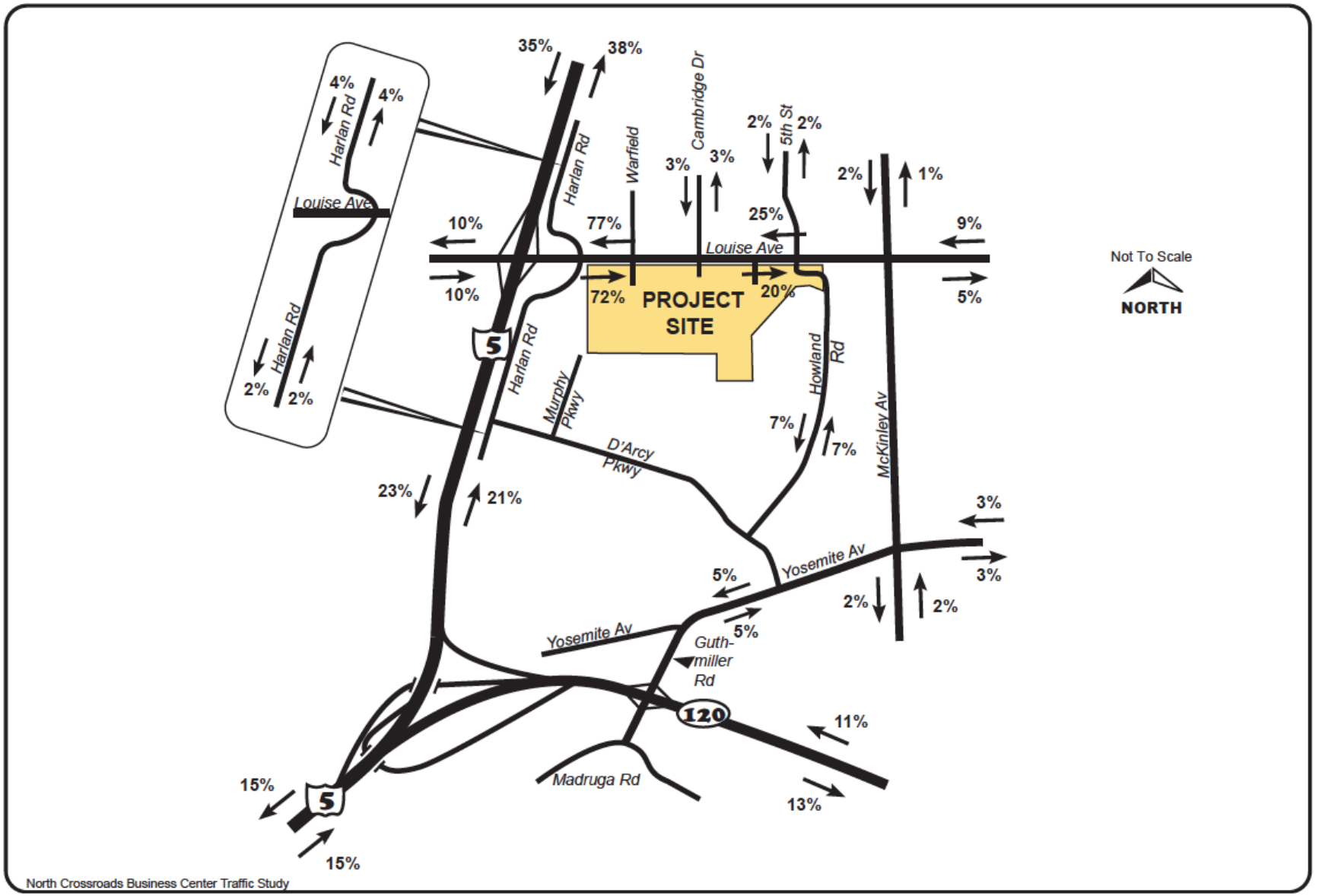
BaseCamp Environmental

Figure 3-1
TRAFFIC STUDY SEGMENTS AND INTERSECTIONS



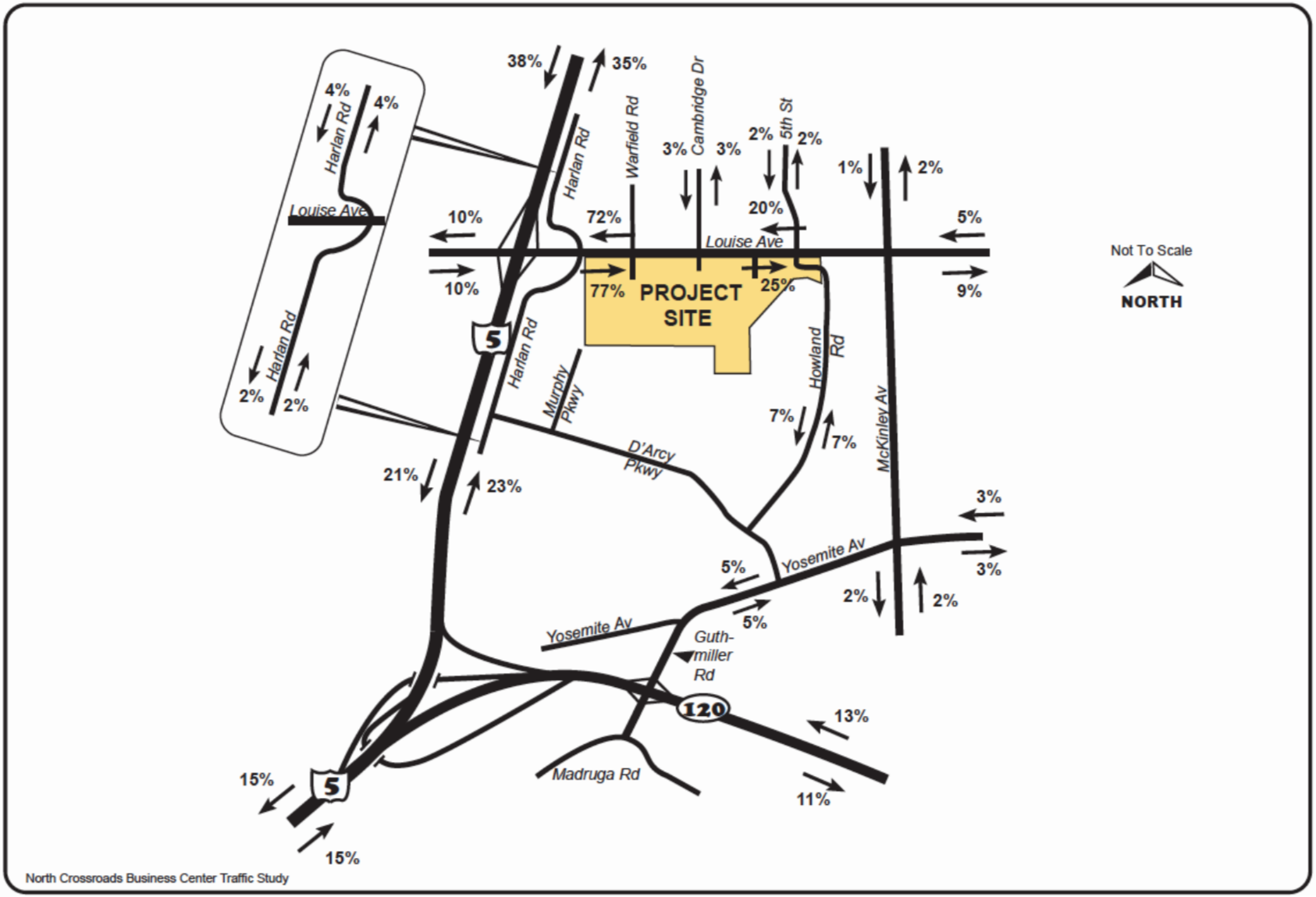
SOURCE: Crane Transportation Group

Figure 3-2
EXISTING SIDEWALKS, TRANSIT ROUTES, AND BICYCLE ROUTES IN VICINITY OF PROJECT



SOURCE: Crane Transportation Group

Figure 3-3
EXISTING OR CUMULATIVE (YEAR 2033) AM PEAK HOUR PERCENT PROJECT TRAFFIC DISTRIBUTION



SOURCE: Crane Transportation Group

Figure 3-4
EXISTING OR CUMULATIVE (YEAR 2033) PM PEAK HOUR PERCENT PROJECT TRAFFIC DISTRIBUTION

LOS at signalized or all-way stop intersections is degraded from an acceptable LOS A, B, C or D operation to an unacceptable LOS E or F, or
LOS is an unacceptable LOS E or F operation under baseline conditions and the project causes an increase in vehicle control delay of 5 seconds or greater.

Significant traffic impacts may also result if the intersection meets peak hour signal Warrant #3 volume criteria levels, or if queueing exceeds available storage.

More detail on potentially applicable significance thresholds is provided in the Crane report.

The analysis concludes that all analysis intersections would maintain acceptable levels of service with the addition of project traffic and that 95th percentile vehicle queues at the I-5/Louise Avenue interchange would remain within available storage with the addition of project traffic. No unsignalized analysis intersections would have peak hour volumes exceeding signalization Warrant #3 volume criteria levels with the addition of project traffic. The traffic impact of the project would be less than significant.

The mix of uses in the proposed project would be expected to result in a significant amount of truck traffic. Based upon review of the existing levels of truck traffic in the Crossroads area and several studies from other California jurisdictions which have surveyed truck usage at conventional and high cube warehousing/distribution centers, percentages of large trucks were projected for the mix of uses in the proposed project and are provided in Appendix D.

Transit

Some transit use would be expected by project employees due to the proximity of the closest bus route along Louise Avenue. However, frequency of service is not great. Use of ACE commuter train along Yosemite Avenue west of McKinley Avenue would not be expected to be significant due to the long distance between the station and the project site (2.2 miles) and the lack of frequent train service. The project would not create an inconsistency with policies concerning transit systems set forth in the General Plan or in other local plans. The project's potential impacts on transit systems would be less than significant.

Bicycle and Pedestrian Facilities Impacts

The project would not disrupt or interfere with existing bicycle facilities as there are none in the area. However, as a part of required frontage improvements along Louise Avenue, the project would include a Class II bikeway. In addition, the project would provide on-site bicycle storage facilities for those employees riding from nearby neighborhoods. The project's potential impacts on bicycle facilities would be less than significant.

The existing Bicycle Master Plan calls for a Class I bicycle facility along the south side of Louise, across the frontage of the Pilkington site. This facility was envisioned to be a combined bicycle and pedestrian facility that would link up with a Class I bicycle facility that would run north and south along the UPRR right of way. Subsequent to this Master Plan being adopted, UPRR informed the City that a Class I bicycle facility would not be allowed to be constructed on Union Pacific Railroad property, especially where it runs parallel with an active rail line. Based upon this communication from UPRR, there is no longer a value in an independent Class I bicycle facility that does not

connect to any other such facility. Staff has therefore recommended to delete this requirement, with the intent of updating the Bicycle Master Plan with this information as part of the General Plan update that has just started. The Class I bicycle facility is therefore not shown on the proposed site plan.

The proposed project shows a possible future sidewalk along its Louise Avenue frontage as well as some internal (ADA compliant) sidewalks that will connect to the future Louise Avenue sidewalk. The reason the sidewalk is not guaranteed is because the Pilkington site agreed to fund the cost of the sidewalk on the north side of Louise Avenue, adjacent to the homes, back in 1993. This was at the request of the City since sidewalks were needed more at this location. In return, the City agreed to find another funding source to install a sidewalk on the south side of Louise Avenue, along the project frontage. Therefore, although the project will set aside land to construct a sidewalk, the developer is not required to, and so far has not offered to install a sidewalk along their Louise Avenue frontage.

A minor level of project pedestrian traffic would be expected external to the project site due to the proximity of nearby restaurants and stores along Louise Avenue (particularly to/from the west) as well as a few employees walking to/from the neighborhood north of Louise Avenue. The project's potential impacts on pedestrian facilities would be less than significant.

c) Impact on Air Traffic Patterns

As discussed in Hazards and Hazardous Materials, 3.8, the project site is not located near a public airport. The project would have no impact on air traffic patterns.

d) Traffic Hazards

The proposed circulation system for light vehicle and truck traffic within the project site is of general traffic and transportation concern. Proposed internal roads and parking areas must be arranged so that access and circulation are generally straight-forward, widths and curve radii are adequate for emergency vehicle access and light vehicle and truck drivers unfamiliar with the site can successfully navigate. Proposed circulation facilities must be adequately sized, configured and signed to accommodate projected traffic, to prevent congestion that might impact flows on Louise Avenue and to allow vehicle movements to and between destinations on the site with minimal conflict.

An earlier version of the proposed internal circulation system was reviewed by Crane Transportation Group in conjunction with preparation of the traffic report (Appendix D). This earlier review and efforts by the applicant's planners resulted in the substantially-improved circulation system shown on Figures 2-3 and 2-4. City review of proposed site plans is in process and will proceed during the public review of this IS/MND and following public review up to presentation of the project to Lathrop decision-makers. It can be assumed that further circulation improvements will be defined by City staff during the review process and incorporated into proposed site plans as required to conform to applicable agency standards. As a result, the internal circulation concerns associated with the project will be less than significant.

The traffic impact analysis study does not identify any off-site traffic hazards that would result from the proposed project. The study intersections have adequate capacity to accommodate the traffic that would be generated by the project. Road hazard impacts are considered less than significant.

Project construction will involve movement of construction equipment onto and from the site and in-street construction to provide new sewer, water line and storm drain improvements. These activities would involve routine but potential traffic hazards. Contractors will be required to provide traffic safety control as warranted.

e) Emergency Access

Access to the site would be provided by three driveways off of Louise Avenue, which would provide adequate access for emergency vehicles. Proposed site plans will be reviewed by the Lathrop Police Department and LMFD as they are prepared and submitted for City review. The project would have less than significant impacts on emergency access.

f) Conflict with Non-vehicular Transportation Plans

During its preliminary review of the project application, the San Joaquin Council of Governments (SJCOG) requested that the City perform a Tier 1 and Tier 2 review of the project for its consistency with the Regional Congestion Management Program (RCMP) and other applicable regional transportation plans. The RCMP addresses a certain network of roads and intersections. A copy of the City's analysis is shown in Appendix E.

As documented in Appendix E, under the Tier 1 review, the project would be consistent with the applicable regional plans, as follows:

> Park-and-Ride Master Plan. The City's development review and approval process requires developers to establish park-and-ride lots in new developments or to pay an in-lieu fee.
>
> Regional Bicycle, Pedestrian, and Safe Routes to School Master Plan. Right-of-way dedication and frontage improvements along Louise Avenue would provide for bicycle and pedestrian circulation along the south side of Louise Avenue.
>
> Regional Smart Growth Transit Oriented Development Plan. This plan concerns new communities with transit-linked residential and employment uses. The project involves further industrial development on an existing industrial site, and therefore the referenced Plan is not relevant to this project.
>
> Regional Transit Systems Plan. The project area is served by existing transit systems. The project would be consistent with the Plan.
>
> Regional Transportation Impact Fee (RTIF) Program. The City participates in the RTIF program; new development is required to pay the RTIF, and therefore the project would be consistent with the RTIF Program.
>
> 2014 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) – The project proposes industrial uses on an existing industrial site that is served by an existing transit system, consistent with RTP/SCS policies and strategies to reduce vehicle trips, thereby reducing GHG emissions. The project would be consistent with the 2014 RTP/SCS.

Interregional STAA Study for I-5 and SR-99. Truck traffic to and from the site would use Louise Avenue, which is an STAA truck route.

Regional Transportation Demand Management (TDM) Plan – Under SJVAPCD Rule 9410, employers must prepare an Employer Trip Reduction Implementation Plan (ETRIP) for each worksite with 100 of more eligible employees. IS/MND mitigation measures require that a TDM plan be prepared for the project in consultation with the SJVAPCD and SJCOG. Preparation of the required TDM plan would provide consistency with the TDM Plan.

The Tier 2 RCMP review involves a determination whether a project will have a significant traffic effect on the RCMP during the AM or PM peak hours under project and cumulative conditions. Both conditions were analyzed in the traffic study for the project (Section 3.16). The project would not involve a significant traffic effect at any of the traffic study locations. As a result, the project would involve a less than significant effect in this issue area.

3.17 TRIBAL CULTURAL RESOURCES

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

NARRATIVE DISCUSSION

Environmental Setting

In 2014, the California Legislature enacted AB 52, which focuses on consultation with Native American tribes on land use issues potentially affecting the tribes. The intent of this consultation is to avoid or mitigate potential impacts on "tribal cultural resources," which are defined as "sites,

features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe." More specifically, Public Resources Code Section 21074 defines tribal cultural resources as:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are included or determined to be eligible for inclusion in the California Register of Historical Resources, or included in a local register of historical resources; or

- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1 [i.e., eligible for inclusion in the California Register of Historical Resources].

Under AB 52, when a tribe requests consultation with a CEQA lead agency on projects within its traditionally and culturally affiliated geographical area, the lead agency must provide the tribe with notice of a proposed project within 14 days of a project application being deemed complete or when the lead agency decides to undertake the project if it is the agency's own project. The tribe has up to 30 days to respond to the notice and request consultation; if consultation is requested, then the local agency has up to 30 days to initiate consultation. In 2016, the Governor's Office of Planning and Research updated Appendix G of the CEQA Guidelines to include sample questions specifically addressing tribal cultural resources. These questions have been incorporated within this IS/MND.

The City of Lathrop provided notice of the proposed project to two tribes - Buena Vista Rancheria Me-Wuk and the Northern Valley Yokuts - that had previously requested notification under AB 52. To date, no requests for consultation have been received by the City

Environmental Impacts and Mitigation Measures

Section 3.5 Cultural Resources discusses previous archaeological surveys and the lack of known sensitive cultural resources on or in the vicinity of the project site. Although no resources specific to local tribes were identified on the project site, the possibility of undiscovered resources, including tribal cultural resources, during project development is acknowledged.

Although the tribes have not yet responded to notice of the project, previous tribal consultation efforts have identified mitigation measures, which address tribal concerns, and which are presented below. Implementation of these measures would reduce potential impacts on tribal cultural resources to a less than significant level.

Mitigation Measures:

TCR-1: If the project site is determined to be a sensitive tribal cultural resource, the ODS shall consult with the affected tribe to establish and implement a procedure for monitoring and reporting all earth-moving and grading activities.

TCR-2: In the event that construction encounters evidence of human burial or scattered human remains, construction in the vicinity of the encounter shall be immediately halted. The ODS shall immediately notify the County Coroner, the Lathrop Community Development Department, and the tribal representative.

The ODS will be responsible for compliance with the requirements of CEQA as to human remains as defined in CEQA Guidelines Section 15064.5, with California Health and Safety Code Section 7050.5, and as directed by the County Coroner. If the human remains are determined to be Native American, the County Coroner shall notify the Native American Heritage Commission (NAHC), and the NAHC will notify and appoint a Most Likely Descendant. The Most Likely Descendant will work with the archaeologist to decide the proper treatment of the human remains and any associated funerary objects.

TCR-3: In the event that other archaeological resources are encountered during project construction, all construction activities in the vicinity of the encounter shall be halted until a qualified archaeologist and tribal representative can examine the materials and make a determination of their "uniqueness" as defined by CEQA. If the resource is determined to be unique, the archaeologist shall recommend avoidance, minimization or mitigation measures that will reduce potential effects to a less than significant level. The ODS will be responsible for retaining the archaeologist and tribal representative and for implementing the recommendations of the archaeologist, including submittal of a written report to the Lathrop Community Development Department and tribal representative documenting the find and its treatment.

3.17 UTILITIES AND SERVICE SYSTEMS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?			√	
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?			√	
c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			√	
d) Are sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?				√
e) Has the wastewater treatment provider which serves or may serve the project determined that it has adequate capacity to serve the project's projected		√		

demand in addition to the provider's existing commitments?				
f) Is the project served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?				√
g) Comply with federal, state and local statutes and regulations related to solid waste?			√	

NARRATIVE DISCUSSION

Environmental Setting

The City's wastewater collection systems consist of approximately 72 miles of gravity mains, 21 miles of force mains, as well as 12 lift and pump stations (City of Lathrop 2018). Wastewater generated in portions of the area east of I-5 is conveyed via gravity sewers and lift stations to the Manteca Water Quality Control Facility (MWQCF). The MWQCF is jointly owned and operated by the Cities of Manteca and Lathrop. The City owns 14.7% of the capacity of the MWQCF, which is 9.87 MGD; the City's allocated capacity is approximately 1.45 MGD. As of 2015, the MWQCF treats approximately 1,040 acre feet of wastewater annually.

The City owns and operates the Lathrop Consolidated Treatment Facility (LCTF) located approximately 0.8 miles south of the proposed project site on Christopher Way. The LCTF provides tertiary treatment and disinfection of wastewater generated in the Crossroads area and in areas of new development located east and west of the San Joaquin River. Treated wastewater is stored during winter in holding ponds and distributed via a non-potable water system for irrigation of agricultural lands and public landscaping areas. The LCTF has a treatment capacity of 1.0 MGD and is currently undergoing staged expansion to increase its treatment capacity to 2.5 MGD.

Wastewater treatment services to the LOF Pilkington site has been provided by an existing private on-site wastewater treatment facility and reservoir, which is managed pursuant to Waste Discharge Requirements issued by the Central Valley Regional Water Quality Control Board. Wastewater is collected from existing building and conveyed via a 10-inch sewer line to the existing treatment facility. All components of the existing treatment facility would be abandoned as part of the proposed project with the exception of the existing pump station. The existing pump station and wet well will be used to transport wastewater collected from existing and new industrial development via a new 10-inch sewer main that would connect the pump station with the City's sewer system south of the project site.

The City of Lathrop has proposed several capital improvement projects to address its existing wastewater collection system. The City is proposing to replace 1,690 feet of a 10-inch PVC gravity main along Murphy Parkway with a 12-inch gravity main, and 1,730 feet of 12 inch PVC gravity main along Nestle Way with a 15-inch gravity main. Approximately 3,420 feet of sewer mainline would be replaced along Murphy Parkway and Nestle Way as part of the Crossroads Gravity Main Replacement Project (City of Lathrop 2018). This project would resolve existing deficiencies and accommodate future flows for pipe and pump sizing, including wastewater flows from the project. The gravity main replacement project is located approximately 1,800 feet southwest of the proposed project.

The City provides potable water to its residents and businesses from two supply sources: (1) groundwater from the City's well field, and (2) surface water from the South County Surface Water Supply Program (SCSWSP) operated by the South San Joaquin Irrigation District (SSJID). Currently, five groundwater wells supply potable water to City residents: Well Nos. 6, 7, 8, 9 and 10. Well No. 21, located within the project vicinity, is not permitted yet for use as a potable water source due to water quality issues. The City is preparing plans to bring Well 21 into compliance to allow its addition to the potable water system. Private wells supply groundwater for use in agricultural and industrial (manufacturing) operations. The pumping capacity of City Well Nos. 6-9 is approximately 7.2 million gallons per day (mgd), and Well No. 10 was estimated to add 1.8 mgd capacity (Nolte Associates 2009).

Frontier Communications Engineering owns and operates a communication line that could be affected by the proposed project. The line runs the entire length of the north project boundary along Louise Avenue, and along the western boundary of the project. The project may require the movement or minor adjustment of the communication line however, any movement would comply with design and construction specifications provided by Frontier Communications Engineering.

Pacific Gas and Electric Company (PG&E) owns and operates overhead and underground electric lines and gas pipelines in the project area as well as a power substation located south and west of the existing LOF Pilkington building. All work within an existing PG&E easement would involve a California PUC 851 filing, if required, and would comply with California PUC Order 95. It is not anticipated that any of the existing distribution power lines and gas lines on site would need to be removed or relocated as part of the project.

Solid non-hazardous waste generated in the City of Lathrop is collected by Allied Waste Service and hauled to Forward Landfill. From the transfer station, waste is then hauled to Foothill Sanitary Landfill in eastern San Joaquin County, approximately 35 miles northeast of the project area. The landfill is permitted to accept up to 1,500 tons of waste per day and has a remaining estimated capacity of 97,900,000 cubic yards. The facility is expected to remain in operation until 2054.

Environmental Impacts and Mitigation Measures

a, e) Wastewater Treatment Requirements and Capacity

Wastewater from proposed new industrial uses would be collected in new sewer lines that would conduct wastewaters from all portions of the new development area to the existing wastewater pump station near the southwest corner of Building 1 by gravity, or pumped through force mains to the same location. These various lines would require construction within the existing LOF Pilkington parcel, including a new line that would collect wastewater from new buildings in the northwestern portion of the site along the west boundary of the LOF Pilkington property to the wastewater pump station. The existing private wastewater treatment facility and reservoir would be abandoned in place as part of the proposed project with the exception of the pump station (Figure 2-6).

A new 10-inch gravity wastewater main line would be constructed from the existing wastewater pump station to the new 10-inch public wastewater line that will be constructed as part of the Murphy-Parkway Warehouse Project; this City line will terminate adjacent to the project site.

According to the Lathrop Business Park Specific Plan, the estimated average wastewater flows for the limited industrial land use is 900 gpd/ac (City of Lathrop 2010). However, the draft City

Wastewater Master Plan is recommending the estimated average flows to be reduced to 355 gpd/ac. The proposed project is not anticipated to generate wastewater flows exceeding 900 gpd/ac. Wastewater generated on site and discharged to the City's sewer system would comply with the sewer use and industrial wastewater regulations outlined in Lathrop Municipal Code 13.26 and not exceed the wastewater treatment requirements of the Central Valley RWQCB. Prior to construction of the new gravity line, the Applicant would enter into an agreement with the owner of the Murphy-Parkway property regarding the connection of the two sewer lines. It's possible that the City's existing sewer lines along Nestle Way and Murphy Parkway may need to be expanded in the future to accommodate wastewater generated due to other new development in the Crossroads area. However, the City has proposed a capital improvement project, discussed above, to account for this growth.

Wastewater discharged to the City's sewer system would comply with the standards and requirements outlined in the City's wastewater discharge permit and Lathrop Municipal Code 13.26. The use of the existing on-site pump station and construction of the new pump and sewer mainlines would not result in significant impacts on the City's wastewater system or treatment capacity.

The City of Lathrop regulates allowed wastewater discharge through issuance of Interceptor Sewer Units (ISUs), which are equivalent to 260 gallons of treatment capacity per day. All requests for transferring ISUs are required to be in the form of a written request to the Public Works Director. The transfer is then approved by and through the City Council. Thus, the City ensures adequate capacity exists to serve any given project prior to approval. The proposed project has been estimated to require 17.5 ISUs to be adequately served. There appears to be adequate capacity to accommodate wastewater flows from the project but this will need to be demonstrated to the City in conjunction with issuance of the ISUs. Project impacts would therefore be considered less than significant with implementation of the following mitigation measure.

Mitigation Measures:

UTIL-1. Prior to the issuance of building permits, the ODS shall quantify the need for Individual Sewer Units (ISUs) related to the permit to satisfaction of the City Public Works Department. The project applicant shall purchase additional ISUs as required to provide adequate capacity for the proposed project, subject to the review and approval of the Public Works Department and City Council.

b), (d) Water System and Supply

New industrial development would be served from existing City water lines located in Louise Avenue. Proposed site plans indicate that individual water services would be extended to provide domestic water to each new industrial building. Fire service lines would also be constructed. New service to the site would result in increases in domestic water use. However, the project site is within the City's existing service area, and the minor increase in water demand would not result in impacts on the City's existing groundwater supplies and would not require new water treatment facilities (see also Section 3.9 Hydrology and Water Quality). The City's existing water supply and treatment facilities can accommodate construction and operation of the project. The project would not require new or added water sources or expanded entitlements, and therefore impacts would be less than significant.

c) New or Expanded Stormwater Drainage Systems

The project would generate additional runoff and storm water volumes from new rooftops and impervious areas. The project would include new storm drainage facilities, which would collect and transport drainage from all areas of new development to the proposed detention basin. This basin will be designed to accommodate an increase is discharge rates from the entire LOF Pilkington site. The applicant's analysis determined runoff volumes for the10-year and 100-year, 24-hour storm events, which amount to 15 acre-feet for the 10-year storm and 17.8 acre-feet for the 100-year storm. The Crossroads Storm Drain Master Plan limits flows off-site to 0.13 acre-feet when the Crossroads treatment facility pumps are operating. If the pumps are not operating, then flows from the 100-year storm must be retained on-site. The proposed detention basin has a 36.25 acre-feet capacity which is more than adequate to handle the potential runoff. Drainage plans will need to be submitted for City approval prior to construction. Drainage improvements would need to comply with City design standards and best management practices contained in the Multi-Agency Post-Construction Stormwater Standards Manual and the City's Storm Water Development Standards and Stormwater Management Plan to minimize the discharge of pollutants to storm drains. Therefore, impacts would be less than significant (See Section 3.9 Hydrology and Water Quality).

f) (g) Solid Waste Effects

Demolition of the existing stack and silos and construction of new buildings would generate solid waste which would be disposed of in compliance with city, state, and federal regulations. The project would comply with the Construction, Demolition and Landscaping Debris Recycling and Diversion Ordinance #4370 which requires that fifty percent of all construction and demolition debris, excluding inert and organic material, and ninety percent of inert and organic materials from the landfill through reuse and recycling. Concrete, asphalt, wood, drywall, metals, and other construction and demolition debris on site would be recycled and salvaged as much as feasible. Materials not able to be recycled would be disposed of at one of the City's landfills.

Project operation is not expected to result in substantial amounts of solid waste. Landfill disposal sites have adequate capacity to accommodate construction and operation waste generated at the site and, therefore, impacts would be less than significant.

3.18 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				
b) Does the project have impacts that are individually limited, but cumulatively considerable? "Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?			√	
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			√	

NARRATIVE DISCUSSION

a) This finding is checked as "Less than Significant with Mitigation Incorporated" based on the project's potential biological, cultural and tribal cultural resource impacts, described in Sections 3.4, 3.5 and 3.17. Potentially significant environmental effects could occur; however, all of the potentially significant effects would be reduced to a less-than-significant level with the incorporation of mitigation measures described in this document. These mitigation measures have been accepted by the ODS and will be considered by Lathrop decision-makers and incorporated into the conditions of project approval.

b) Cumulative impacts are defined as the impact on the environment that results from the incremental effect of the proposed project when added to other past, present, and reasonably foreseeable actions. This finding is checked as "Less than Significant" and is described further in the paragraphs below.

Combined Environmental Effects of Project

As described in this Initial Study, most of the potential environmental effects of the project would be less than significant or the project would have no impact at all, when compared to the baseline. Where the project involves potentially significant effects, these effects would be reduced to a less-than-significant level either with proposed mitigation measures or by compliance with required permits and applicable regulations. The potential that any of these effects could combine with any other project effect or effects to result in a significant cumulative effect was considered during the preparation of this IS/MND. No potential cumulative effects would result from combinations of the potential environmental effects identified in the IS/MND.

Cumulative Impacts Using the General Plan Projection Approach

The potential cumulative impacts of long-range urban development in the City of Lathrop are accounted for in the Lathrop General Plan EIR (GPEIR). The GPEIR analysis considers the environmental effects of buildout of all lands designated in the general plan for urban development, including further industrial development of the project site and other undeveloped industrial lands in the project vicinity. The proposed project will contribute to the long-range cumulative environmental impacts identified in the GPEIR, including potential cumulative impacts of urban development on the resources and environmental conditions addressed at a project level in this

IS/MND. The proposed project will involve industrial development consistent with the existing industrial land use designation of the site and quantities of buildout development assumed in the GPEIR. The proposed project will not, however, involve any known change in or any considerable new contribution to the significant cumulative impacts identified in the General Plan EIR. Therefore, in total the project's contributions to cumulative impacts would be less than significant.

The project's potential for cumulatively considerable contributions to traffic, noise and air quality impacts were considered in Sections 3.3 Air Quality, 3.7 Greenhouse Gases, 3.12 Noise and 3.16 Transportation and the technical studies and modeling supporting these analyses. Potentially significant cumulative impacts that would not be reduced to a less than significant level with mitigation measures were not identified in any of these sections.

Cumulative Traffic Impacts

With planned development and programmed roadway improvements, all analysis intersections will be operating at acceptable levels of service during both the AM and PM peak traffic hours (Appendix D). The Louise Avenue signalized intersections with the I-5 ramps and Harlan Road will be operating at acceptable LOS C or D, while the signalized Yosemite Avenue intersections with the SR 120 ramps will be operating at an acceptable LOS B or C. The Louise Avenue/Cambridge Drive intersection will be operating at an acceptable LOS B during both peak hours.

The analysis of 95th percentile queuing under cumulative conditions found that all queues will be within available storage. None of the unsignalized intersections would meet Warrant #3 volume criteria levels under cumulative baseline conditions.

The Crane traffic impact report analyzed the effects of adding project-related traffic to the projected cumulative roadway system and traffic levels. Under cumulative conditions, all analysis intersections would maintain acceptable levels of service with programmed improvements and the addition of project traffic. Under cumulative conditions, 95th percentile vehicle queues at the I-5/Louise Avenue interchange would remain within available storage, and no unsignalized analysis intersections would have peak hour volumes exceeding signal Warrant #3 volume criteria levels.

c) As discussed in the various sections throughout this CEQA document, the construction and operation of the proposed project would not result in substantial adverse impacts on human beings. All mitigation measures would be required as part of project approval.

4.0 REFERENCES

4.1 DOCUMENT PREPARERS

This IS/MND was prepared by BaseCamp Environmental, Inc. for use by and under the supervision of the City of Lathrop Community Development Department. The following persons were involved in preparation of the IS/MND:

City of Lathrop Community Development Department

Rebecca Schmidt
Rick Caguiat

BaseCamp Environmental

Charlie Simpson
Terry Farmer
Allison Getty
Krista Simpson

4.2 DOCUMENTS CITED

Arcadis, U.S., Inc. Well Destruction Plan. 2017. Former Occidental Chemical Corporation Facility. August 10, 2017.

Berloger, Stevens, and Associates. 2015. Geotechnical Investigation, Former Pilkington Glass Company.

California Air Resources Board (ARB). 2008. Climate Change Scoping Plan: A Framework for Change. Adopted December 2008.

_____. 2014. First Update to the Climate Change Scoping Plan: Building on the Framework. May 2014.

_____. 2017a. California Greenhouse Gas Emissions for 2000-2015 – by Category as Defined in the 2008 Scoping Plan. June 6, 2017.

_____. 2017b. California's 2017 Climate Change Scoping Plan. November 2017.

California Climate Action Team. 2010. Climate Action Team Biennial Report – Executive Summary. April 2010.

California Department of Conservation, Division of Oil, Gas and Geothermal Resources. 2018. Oil, Gas and Geothermal Well and Field Maps, Map 606. Accessed April 28, 2018.

California Department of Conservation, Farmland Mapping and Monitoring Program. Important Farmland Categories. Accessed 01/08/2018 from http://www.conservation.ca.gov/dlrp/fmmp/mccu/Pages/map_categories.aspx

California Geological Survey. 2015. CGS Information Warehouse, Mineral Land Classification. Accessed on 3/11/18 from https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc

California Department of Education. Education Data Partnership. Manteca Unified School District. Accessed on 03/15/18 from http://www.ed-data.org/district/San-Joaquin/Manteca-Unified

California Department of Finance. 2017. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2017 with 2010 Census Benchmark. Accessed on 03/04/18 from http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/

California EPA Department of Toxic Substances. EnviroStor Database. Cal/EPA Cortese List. Accessed on 03/21/18 from http://www.envirostor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site_type=CSITES,OPEN,FUDS,CLOSE&status=ACT,BKLG,COM,COLUR&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+(CORTESE)

California Department of Transportation. California Scenic Mapping System. Accessed on 03/17/18 from http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm

California Geological Survey. 2017. CGS Seismic Hazard Zonation Program. Accessed 4/22/18 from http://www.conservation.ca.gov/cgs/shzp.

California State Water Resources Control Board. Geotracker. Accessed on 03/21/18 from https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=Lathrop+California

California Department of Water Resources. Dam Inundation Maps. Accessed 3/23/18 from https://www.water.ca.gov/Programs/All-Programs/Division-of-Safety-of-Dams/Inundation-Maps

City of Lathrop. 2004. Comprehensive General Plan for the City of Lathrop, CA.

City of Lathrop. 2008. Storm Water Development Standards. Accessed 4/2/18 from http://www.ci.lathrop.ca.us/storm_drainag/home/dsp.pdf

City of Lathrop. 2015 Urban Water Management Plan. 2015. Accessed 3/23/18 from http://www.ci.lathrop.ca.us/lathrop/pwd/pdf/Lathrop2015UWMP-Final_20171003.pdf

City of Lathrop. 2015. Multi-Agency Post-Construction Stormwater Standards Manual. Accessed on 3/26/18 from http://www.ci.lathrop.ca.us/storm_drainag/home/Post-Const.%20Standards%20Manual%20Part%201%20of%203.pdf

City of Lathrop. 2015. Draft General Plan Amendment of 2015, SB 5 200-year Flood Protection. March 25, 2015

City of Lathrop. Municipal Services Review and Sphere of Influence. 2016. Accessed on 03/11/18 from http://www.ci.lathrop.ca.us/cdd/documents/pdf/07-06-2016_16-48-07-269_269.pdf

City of Lathrop. Lathrop Manteca Fire Department. 2016. Accessed on 03/22/18 from http://nebula.wsimg.com/2a2d26f77953a97838e40db00e229e18?AccessKeyId=1ED1E39597A74FF23EFF&disposition=0&alloworigin=1

City of Lathrop. 2018. Capital Improvement Projects. Integrated Wastewater Resources Master Plan Update (Wastewater). Accessed on 04/11/18 from http://www.ci.lathrop.ca.us/pwd/pdf/05-01-2018_16-35-58-520.pdf

Federal Highways Administration. 2006. Construction Noise Handbook, Section 9.0, Construction Equipment Noise Levels and Ranges. Accessed 3/21/18 from https://www.fhwa.dot.gov/environment/noise/construction_noise/handbook/handbook09.cfm=

Moore. Moore Biological Consultants. 2018.San Joaquin County, California: Preliminary Biological Resources Review. May, 2018.

Natural Resources Conservation Service. Web Soil Survey. Areas of Interest Interactive Map. Accessed on 02/28/18 from https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx

Natural Resources Conservation Service. Official Soils Series Descriptions and Series Classification. Accessed on 02/26/18 from https://soilseries.sc.egov.usda.gov/scname.aspx

San Joaquin Council of Governments. 2013. San Joaquin County Airport Land Use Commission. Project Review Guidelines for the Airport Land Use Commission.

San Joaquin County, CA. 2014. San Joaquin Council of Governments, Regional Transportation Plan/OG RTP/SCS EIR. https://www.sjcog.org/DocumentCenter/View/557

San Joaquin Council of Governments. 2018. San Joaquin County Aviation System, Airport Land Use Compatibility Plan. As Amended, January 2018.

San Joaquin County Department of Health Services. San Joaquin County Haz Mat Viewer. Accessed on 03/21/18 from http://www.sjmap.org/hazmatviewer/viewer.asp

San Joaquin County Fire Prevention Bureau. 2017. Fire Apparatus Access Road Standards. Accessed on 3/27/18. https://www.sjgov.org/commdev/cgi-bin/cdyn.exe/file/Building/Fire%20Department%20Regulations/FIRE%20ACCESS%20ROADS.pdf

San Joaquin County Flood Zone Viewer. Accessed 3/23/18 from http://www.sjmap.org/floodzoneviewer/Disclaimer.htm

San Joaquin County Flood Control and Water Conservation District. Groundwater Report. Spring 2015.

San Joaquin County Solid Waste Division. Ordinance 4370. https://www.sjgov.org/WorkArea/DownloadAsset.aspx?id=22792

San Joaquin Valley Air Pollution Control District (SJVAPCD). 2009. Final Staff Report – Climate Change Action Plan: Addressing Greenhouse Gas Emissions Impact under the California Environmental Quality Act. December 17, 2009.

_____.2015a. Ambient Air Quality Standards & Valley Attainment Status. http://www.valleyair.org/aqinfo/attainment.htm. Accessed December 7, 2015.

_____. 2015b. Guide for Assessing and Mitigating Air Quality Impacts (GAMAQI). March 19, 2015.

U.S. Census Bureau. American Fact Finder. 2016 ACS 5-Year Estimates. Accessed on 03/02/18 from https://factfinder.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t#

U.S. Census Bureau. 2016. 2012-2016 American Community Survey 5-Year Estimates. Accessed on 03/03/18 from https://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml?src=bkmk

U.S. Environmental Protection Agency (EPA). 2009. Endangerment and Cause of Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act. Federal Register Vol. 74, No. 239, pp. 66496-66546. December 15, 2009.

U.S. Geological Survey, California Water Science Center. 2017. California's Central Valley. Accessed 02/22/18 from https://ca.water.usgs.gov/projects/central-valley/about-central-valley.html

Yokoyama, Travis. 2018. Airport Land Use Compatibility Plan. Project Review Letter from Travis Yokoyama, ALUC. March 29, 2018.

4.3 PERSONS CONSULTED

Caguiat, Rick. Senior Planner. City of Lathrop.

Schmidt, Rebecca. Planning Director. City of Lathrop.

Coleman, Jason. Principal. Solano Archaeological Services.

Crane, Mark. Principal. Crane Transportation Group.

Gebhardt, Glenn. City Engineer. City of Lathrop.

Moore, Diane. Principal. Moore Biological Consultants.

5.0 NOTES RELATED TO EVALUATION OF ENVIRONMENTAL IMPACTS

The Environmental Checklist and discussion is based on sample questions provided in the CEQA Guidelines which focus on specific environmental resource issues. The questions are designed to assess the potential impacts of the proposed project. All answers must take into account the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts. Once the lead agency has determined that a physical impact may occur, then the checklist answers must indicate whether the impact is "no impact", "less than significant", "less than significant with mitigation" or "potentially significant". Answers to the questions in the Checklist are described below.

- "No impact" response indicates that the project action would not have an adverse effect on the environment. A "No Impact" answer is adequately supported if the referenced information shows that the impact does not apply to projects like the one proposed (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- "Less than significant" response indicates that while there may be the potential for an environmental impact, there are project design features and standards, procedures, or regulations in place which would limit the extent of the impacts to a level of "less than significant".
- "Less than significant with mitigation" indicates that mitigation measures must be implemented to affectively reduce the environmental impacts to a level of "less than significant". Implementation of mitigation measures would be required as a condition for project approval.
- "Potentially significant impact" indicates that further evaluation and analysis is required to determine the extent of potential impacts and to identify additional mitigation measures. If one of more impacts are considered to be "potentially significant impact" then an Environmental Impact Report would be required.

A "Negative Declaration" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must identify the significance criteria or threshold, if any, used to evaluate each question and briefly explain how each mitigation measure would reduce the effect to a less than significant level. Lead agencies are encouraged to include in the Checklist, references for potential impacts (e.g., general plans, zoning ordinances). Earlier analyses may be used where, pursuant to tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration.

This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.